

**FINAL  
SUPPLEMENTAL  
ENVIRONMENTAL  
IMPACT  
REPORT**

04/25/03

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**EAST OTAY MESA SPECIFIC PLAN  
SUNROAD CENTRUM**

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This Environmental Impact Report was certified by the

\_\_\_\_\_ on \_\_\_\_\_  
(Decision-Making Body) (Date/Item Number)

Gary L. Pryor, Director  
County of San Diego, Department of Planning and Land Use

# Table of Contents – T.O.C.

---

## Table of Contents

<b>Summary</b> .....	S-1
Project Synopsis .....	S-1
Summary of Significant Effects and Mitigation Measures that Reduce the Significant Effects .....	S-2
Project Alternatives .....	S-3
Areas of Controversy .....	S-7
Issues to be Resolved by the Decision-Making Body .....	S-7
<b>Chapter 1.0 Project Description and Environmental Setting</b> .....	1-1
1.1 Project Description and Location .....	1-1
1.2 Project Objectives .....	1-6
1.3 Intended Uses of the Supplemental EIR .....	1-6
1.3.1 Matrix of Project Approvals/Permits .....	1-7
1.3.2 Incorporation by Reference .....	1-7
1.3.3 Responsible and Trustee Agencies .....	1-7
1.4 Environmental Setting .....	1-11
1.4.1 Consistency of Project With Applicable Regional and General Plans	1-11
<b>Chapter 2.0 Significant Environmental Effects</b> .....	2-1
Impacts Adequately Analyzed in Previous EIR .....	2-1
Previously Adopted Mitigation Measures Applicable to the Proposed Project .....	2-1
Additional Analyses Required for the Proposed Project .....	2-5
2.1 Land Use .....	2-5
2.1.1 Existing Conditions .....	2-7
2.1.2 Thresholds of Significance .....	2-7
2.1.3 Analysis of Project Effects and Determination as to Significance	2-8
2.1.4 Mitigation Measures .....	2-10
2.1.5 Conclusions .....	2-11
2.2 Noise .....	2-11
2.2.1 Existing Conditions .....	2-11
2.2.2 Thresholds of Significance .....	2-12
2.2.3 Analysis of Project Effects and Determination as to Significance	2-12
2.2.4 Mitigation Measures .....	2-14
2.2.5 Conclusions .....	2-17
2.3 Biological Resources .....	2-17
2.3.1 Existing Conditions .....	2-18
2.3.2 Thresholds of Significance .....	2-27
2.3.3 Analysis of Project Effects and Determination as to Significance	2-28

# Table of Contents – T.O.C.

2.3.4	Mitigation Measures	2-33
2.3.5	Conclusions	2-41
2.4	Cultural Resources	2-41
2.4.1	Existing Conditions	2-42
2.4.2	Thresholds of Significance	2-43
2.4.3	Analysis of Project Effects and Determination as to Significance	2-45
2.4.4	Mitigation Measures	2-45
2.4.5	Conclusions	2-47
2.5	Transportation/Circulation	2-47
2.5.1	Existing Conditions	2-48
2.5.2	Thresholds of Significance	2-51
2.5.3	Analysis of Project Effects and Determination as to Significance	2-54
2.5.4	Mitigation Measures	2-62
2.5.5	Conclusions	2-66
2.6	Air Quality	2-67
2.6.1	Existing Conditions	2-67
2.6.2	Thresholds of Significance	2-71
2.6.3	Analysis of Project Effects and Determination as to Significance	2-72
2.6.4	Mitigation Measures	2-73
2.6.5	Conclusions	2-74
<b>Chapter 3.0</b>	<b>Cumulative Impacts</b>	3-1
3.1	List of Past, Present, and Reasonably Anticipated Future Projects in the Project Area	3-1
3.2	Subject Area Cumulative Impact Analysis	3-4
3.2.1	Existing Conditions	3-4
3.2.2	Thresholds of Significance	3-5
3.2.3	Analysis of Project Effects and Determination as to Significance	3-6
3.3.4	Mitigation Measures	3-7
<b>Chapter 4.0</b>	<b>Project Alternatives</b>	4-1
4.1	Rationale for Alternative Selection	4-1
4.2	Analysis of the Alternative Road Alignment Alternative	4-1
4.2.1	Alternative Road Alignment Alternative Description and Setting	4-1
4.2.2	Comparison of the Effects of the Alternative Road Alignment Alternative to the Project	4-2
4.2.3	Applicant's Rationale for Rejection of the Alternative Road Alignment Alternative	4-4
<b>Chapter 5.0</b>	<b>Long-Term Environmental Effects</b>	5-1
5.1	Growth Inducing Impacts	5-1
5.2	Significant Irreversible Environmental Changes Resultant From Project Implementation	5-2

# Table of Contents – T.O.C.

---

5.3	Conclusions .....	5-3
<b>Chapter 6.0</b>	<b>Environmental Effects Found Not To Be Significant .....</b>	<b>6-1</b>
6.1	Effects Found not to be Significant as part of the EIR Process .....	6-1
6.2	Effects Found not to be Significant During Initial Study .....	6-1
	<b>List of References .....</b>	<b>7-1</b>
	<b>List of SEIR Preparers and Persons and Organizations Contacted .....</b>	<b>8-1</b>
	<b>List of Persons, Organizations and Public Agencies That Have Commented or Given Recommendations on the Draft EIR .....</b>	<b>9-1</b>
	<b>Responses to Comments and Recommendations Received on the Draft EIR ...</b>	<b>10-1</b>
<b>Technical Appendices .....</b>	<b>Bound Under Separate Cover</b>	
A.	Notice of Preparation and Letter Responses	
B.	Addendum to the Biological Technical Report, Biological Technical Report, Draft Resource Conservation Plan, BRCA Findings, & Letter Report on The San Diego and Riverside Fairy Shrimp	
C.	Traffic Noise Study	
D.	Letter Report on Cultural Resources	
E.	Traffic Study and Associated Addendum	



# Table of Contents – T.O.C.

---

## Figures

1.1-1	Regional Map	1-2
1.1-2	Project Location	1-3
1.1-3	East Otay Mesa Specific Plan Area	1-4
1.3-1	Tentative Tract Map	1-8
1.3-2	MSCP Subregional Plan Minor Amendment Area	1-9
2.1-1	East Otay Mesa Specific Plan Land Use Map	2-6
2.2-1	Projected Aircraft Produced CNEL Contours for Brown Field (Year 2000)	2-15
2.3-1	Existing Vegetation and Sensitive Species	2-20
2.5-1	Existing Roadways Conditions Diagram	2-49
2.5-2	Existing Traffic Volumes	2-52
2.5-3	Phase I Project Traffic Volumes	2-57
2.5-4	Existing Plus Cumulative Projects and Proposed Traffic Volumes	2-59
3.1-1	Other Proposed and Approved Projects in the Project Vicinity	3-3
4.2-1	Alternative Road Alignment for Lone Star Road	4-3

## Tables

S-1	Summary of Additional Impacts and Mitigation for the Sunroad Centrum Project	S-4
2.2-1	Worst-Case Noise Exposures	2-13
2.3-1	Sensitive Plant Species on the Sunroad Centrum Project Site	2-24
2.3-2	Observed Sensitive Wildlife Species	2-26
2.3-3	Summary of Impacts	2-29
2.5-1	Existing Daily Volumes and Level of Service Summary	2-53
2.5-2	Existing Signalized Intersection Level of Service Summary	2-53
2.5-3	Existing Two-Way Stop-Controlled Intersection Level of Service Summary	2-54
2.5-4	Project Trip Generation	2-56
2.5-5	Existing Plus Proposed Project and Cumulative Projects Roadway Segment Level of Service	2-60
2.5-6	Existing Plus Proposed Project & Cumulative Projects Intersection Level of Service	2-61
2.5-7	Buildout Level of Service Summary	2-63
2.6-1	State of California Air Resources Board Ambient Air Quality Standards	2-68
2.6-2	Project Area Air Quality Monitoring Summaries	2-70
3-1	Other Proposed and Approved Projects in the Project Vicinity	3-1

## SUMMARY

### Project Synopsis

#### Project Description

On July 27, 1994, a project EIR was certified for the East Otay Mesa Specific Plan, which included an analysis of the impacts associated with the proposed uses on the *SUNROAD CENTRUM* project site. Since that date, a change of circumstances not previously considered in the East Otay Mesa Environmental Impact Report has arisen. Therefore, there is substantial evidence that the project may have significant adverse impacts on the environment and pursuant to CEQA Section 15163, a Supplemental Environmental Impact Report (SEIR) is required. This Supplemental Environmental Impact Report (SEIR) has been prepared to address this change in circumstances and to provide minor changes and additions to the previously certified EIR in order to make the previous EIR adequately apply to the proposed project. As an informational document, together with the previous EIR, it provides decision makers and members of the general public with a complete evaluation of the project.

The proposed project, which consists of about 250.5 acres within the East Otay Mesa Specific Plan area would be developed in two phases to partially mitigate short-term cumulative traffic impacts associated with the project. Under a worst-case scenario, the first phase would be completed within two years of project approval and would provide for the development of approximately 74 industrial lots on approximately about 130 acres.

Phase II would consist of 22 commercial lots on 34.4 acres west of Harvest Road and would not commence until the opening of either the SR-125 or SR-905. It is anticipated, at this time, that SR-125 would be open by the Year 2003 and the SR-905 would be operational by the Year 2005. The SR-905 project would consist of extending SR-905 from I-805 to the Otay Mesa Road entry at the U.S. Mexican border. The new section would run parallel and approximately 1,300 feet south of the existing Otay Mesa Road. The SR-125 project would consist of constructing an eleven-mile stretch of highway from SR-905 to SR-54.

The remainder of the proposed project area would consist of public roads and a 51.57 acres Remainder Parcel of open space. ~~This Remainder Parcel would consist of an 8.0-acre Potential Future Development area and a 43.24-acre open space easement. No development is being proposed within the 8-acre Potential Future Development Area. However, if in the future a development proposal for this area is submitted to the County for consideration, a site-specific CEQA-review process and Major Amendment Process would be required.~~ The 51.7 acres of open space would include An area of about 0.25 acre, consisting of an isolated vernal pool, which would be preserved as permanent open space within one of the proposed commercial/industrial lots located near the southeast corner of the proposed intersection of Lone Star Road and Sanyo Ave, and an additional area of about ~~43.24~~ 51.5 acres, consisting of a vernal pool complex and sensitive biological habitat, which would be preserved through an open space easement, ~~within the Remainder Parcel~~, located north of Lone Star Road.

### **Project Objectives**

The primary objective of the project is to implement the Otay Mesa Specific Plan through the provision of commercial/industrial uses that would create job opportunities, accommodate forecasted growth, protect open space and contribute to the development of infrastructure, streets and a circulation system that would accommodate forecasted public utility and service needs and traffic growth. A second objective is to implement the County MSCP by providing for a minor amendment to the subregional plan that would permanently preserve about ~~43.49~~ 51.7 acres of wetlands/vernal pools and sensitive biological habitat.

### **Project Location**

The proposed *SUNROAD CENTRUM* project is located in the County of San Diego within the northwest quadrant of the East Otay Mesa Specific Plan area, and is generally bound by Otay Mesa Road on the south, the Specific Plan boundary on the north, Paseo de las Americas on the east and Harvest Road on the west.

### **Environmental Setting**

The *SUNROAD CENTRUM* project is generally located in the northwest quadrant of the East Otay Mesa Specific Plan area. The project site, which has been subject to recurrent agricultural use, consists of relatively flat to rolling topography that rises gently to the north across about four-fifths of the site, where it rapidly drops off to the north and northeast into Johnson Canyon. A creek, located within Johnson Canyon and identified as a fresh water marsh, flows along the northeast corner of the site, and a vernal pool complex, is situated in the north-central portion of the subject site. The East Otay Mesa Specific Plan EIR identifies the soil content of the site as being alluvium.

A number of trails cross the site in the north and central portions, including a trail proposed as the general alignment of Lone Star Road, a proposed six-lane prime arterial. An unimproved, but graded, segment of Harvest Road, a proposed four-lane commercial/industrial collector road, establishes most of the western boundary of the project site and extends southward from the location of the Lone Star Road alignment to the existing Otay Mesa Road, a proposed six-lane major arterial which exists as a two-lane collector along the southern boundary of the site.

Habitat on the site consists of coastal sage scrub/~~non-native grassland mix~~, vernal pools, southern willow scrub, disturbed wetland/waters, native grassland, non-native grassland, and disturbed habitat. The disturbed wetland waters and the vernal pool complex exist within the coastal sage scrub ~~non-native grassland mix~~.

### **Summary of Significant Effects and Mitigation Measures that Reduce the Significant Effects**

The County of San Diego determined, during its Initial Study of the proposed project, that

## Summary

implementation of the project would result in potential impacts to the following six issue areas that were either not previously discussed in the East Otay Mesa Specific Plan EIR, or to which there has been a change in circumstance since certification of the original EIR: Land Use, Transportation/Circulation, Air Quality, Noise, Biological Resources, and Cultural and Paleontological Resources.

Upon further review of the proposed project, the County determined that additional noise and air quality impacts would not be created by the proposed project because the proposed project modification (the extension of Otay Mesa Road to SR-905) would not affect the type of uses and number of vehicular trips that would be generated from the proposed project, therefore, the air emissions calculated in the Specific Plan EIR for the proposed project would not change.

A summary of the significant effects and mitigation measures associated with the proposed *SUNROAD CENTRUM* project, that were not previously addressed in the EOMSP EIR, is presented in Table S-1.

### Project Alternatives

The plan evolution process for the proposed *SUNROAD CENTRUM* project included construction of the project as currently designed (consistent with the East Otay Mesa Specific Plan), including the proposed off-site connection to Otay Mesa Road, however, the entire project would be constructed all in one phase. That project was submitted to the County of San Diego for review in October 1999. That design was not carried forward because the proposed project would create cumulatively significant traffic impacts in the short-term that could not be mitigated. Accordingly, the proposed project-schedule was modified to propose a two-phase project that is consistent with the Specific Plan to partially mitigate the short-term cumulative traffic impacts.

Although a reasonable range of alternatives was provided in the Specific Plan EIR, it was determined that an additional alternative (the "Alternative Road Alignment" alternative) be analyzed that would lessen potential impacts associated with biological resources (specifically the recently-listed San Diego and Riverside fairy shrimp). A detailed discussion of the impacts associated with this alternative and the reasons for its rejection are provided in Section 4.2 of this SEIR.

Under the "Alternative Road Alignment" alternative, Lone Star Road would be constructed two to three hundred feet south of its current proposed location to avoid the potential indirect impacts to the vernal pool habitat (San Diego and Riverside fairy shrimp habitat) associated with habitat fragmentation that may occur under the proposed project. Although, vernal pool fragmentation was analyzed under the previous Specific Plan EIR, the potential impacts to the San Diego and Riverside fairy shrimp were not analyzed because the species were not considered a species of concern during the original analysis.

The "Alternative Road Alignment" would consist of the same uses as being proposed in the proposed *SUNROAD CENTRUM* project, however, there would be less acres developed for industrial/commercial uses and more acres would be set aside for the proposed open space preserve, and Street "A" would terminate as cul-de-sac and would no longer connect to Sanyo Avenue.

**TABLE S-1  
SUMMARY OF ADDITIONAL IMPACTS AND MITIGATION  
FOR THE SUNROAD CENTRUM PROJECT**

ISSUE AREA	IMPACT	MITIGATION	RESIDUAL IMPACT
Land Use	Potential significant impacts associated with the proposed Minor Amendment and the goals and policies of the MSCP Subarea Plan.	To mitigate potential impacts to the MSCP, a minor amendment and RCP must be approved by the County of San Diego, USFWS, and CDFG.	Mitigation measures identified in this SEIR would reduce the potentially significant impacts to a level below significant.
Noise	<p>Potentially significant noise impacts to noise-sensitive uses (wetland mitigation site and open space easement) within the Remainder Parcel would be created by the proposed project due to the combination of traffic-related noise and the noise from the anticipated Brown Field Airport activities.</p> <p><u>The proposed project would not propose any noise sensitive uses within areas that exceed the County's noise standards.</u></p> <p><u>Wildlife expected to occur within traffic-related noise areas would not be considered noise sensitive.</u></p>	<p>Mitigation measures (creation of sufficient buffer zones) proposed in the RCP and Section 2.3.4 of this SEIR would mitigate the potential impacts to biological resources within the Remainder Parcel.</p> <p>A site-specific noise study and subsequent CEQA review process shall be required for any future uses within the Remainder Parcel.</p> <p><u>No mitigation is required.</u></p>	<p>Mitigation measures would reduce the significant impacts to a level below significant.</p> <p><u>Not applicable.</u></p>

<p>Biological Resources</p>	<p>Significant impacts are expected to occur to 0.31 acre (including 0.20 acre of southern willow scrub) of wetlands and waters of the U.S, <del>16.12.1</del> acres of coastal sage scrub /<del>non-native grassland mix</del>, <u>4.2 acres of native grassland</u>, and <del>176.66</del> <u>186.4</u> acres of non-native grassland habitat. The project would also create direct and indirect significantly impacts to animal species (black-shouldered kite, northern harrier, and San Diego and Riverside fairy shrimp) and plant species (variegated dudleya, San Diego button-celery, San Diego barrel cactus, and prostrate navarretia).</p>	<p>Proposed mitigation for these impacts would include a combination of some or all of the following: on-site preservation of the vernal pools, habitat restoration of fairy shrimp habitat and disturbed waters and coastal sage scrub habitat on-site, off-site purchase of additional lands needed to off-set impacts in accordance with the BMO, and <del>sensitive plant and fairy shrimp salvage and translocation program of barrel cactus and variegated dudleya.</del></p>	<p>The proposed mitigation would reduce the impacts to a level below significant.</p>
<p>Cultural and Paleontological Resources</p>	<p>The off-site roadway improvements would impact two prehistoric Site CA-SDI-5352/CA-SDI-12337, however, the portion of CA-SDI-5352/12337 that was tested was not identified as significant.</p> <p>The project's on-site improvements would impact Site CA--SDI-5352. In the event there are undiscovered, buried significant resources, mitigation measures are recommended to avoid the potential for significant impacts during construction.</p> <p>Site CA-SDI-12370 was identified as significant and was recommended for avoidance. This prehistoric site lies within the proposed open space preserve easement on the project site. Accordingly, no impacts would occur to this prehistoric site.</p>	<p>Provide monitoring by an archaeologist of grading development for CA-SDI-5352. The archaeologist will have the authority to halt or divert equipment should features be encountered.</p> <p>Site CA-SDI-12730 will be placed within the proposed open space easement on the project site. The entire easement will be fenced and the prehistoric site will be preserved in a natural state within the easement.</p>	<p>Potential impacts to cultural resources would be reduced to a level below significant.</p>

## Summary

<p>Transportation/ Circulation</p>	<p>The proposed project would have a significant impact to three roadway segments and four intersections in the short-term (Phase I).</p>	<p>Improve an on-site segment of Old Otay Mesa Road from Harvest Road to the project's eastern property boundary, per the County's <u>tentative map conditions. (See Mitigation Measures 2.5.4.1.a through d.)</u></p> <p><u>Pursuant to a reimbursement agreement with the County; a</u> An off-site segment of Old Otay Mesa Road between Harvest Road and Otay Mesa Road (SR-905), <u>and the Old Otay Mesa Road/ Otay Mesa Road (Sr-905) intersection shall be improved to provide a LOS of D or better at those facilities. The improvements shall be provided according to one of the improvement options provided in Mitigation Measure 2.5.4.2.</u></p> <p><u>Pursuant to a reimbursement agreement with the County; the Otay Mesa Road (SR-905)/Old Otay Mesa Road intersection shall be improved concurrently with the off-site street segment improvements:</u></p> <p><u>Per the County of San Diego's conditions of approval, the applicant shall construct a traffic signal with dual eastbound left turn lanes at the intersections of Old Otay Mesa Road/Harvest Road and Old Otay Mesa Road/ Sanyo Avenue. In addition, the applicant shall provide an eastbound left turn lane at the intersection of Otay Mesa Road and "G" Street.</u></p>	<p>Mitigation measures identified in the SEIR would reduce the short-term traffic impacts (except for one roadway segment and three intersections) to a level below significant. <u>Some short-term cumulative impacts would remain significant.</u> The residual short-term impacts would be mitigated with the completion of the SR-905 improvements and the opening of SR-125.</p>
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Air Quality	Upon further review of the analyses provided in the EOMSP Plan EIR, the County has determined that additional air quality impacts associated with the project would not occur. Accordingly, the direct and cumulative air quality impacts identified in the EOMSP EIR would remain the same.	The project shall implement the applicable mitigation measures adopted the EOMSP EIR (see Section 2.6.4 of this EIR).	Mitigation measures identified in the Specific Plan EIR would reduce the direct significant impacts to a level below significant, but the cumulative impacts would remain significant.
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Under this alternative, impacts to sensitive vegetation communities and plant and animal species on-site would be reduced as compared to the proposed project, but not to a level below significant. All of the impacts would be mitigated to the same ratios required under the proposed project, via preservation and re-creation of habitat on-site and the acquisition and preservation of habitat off-site. Indirect impacts associated with habitat fragmentation within the vernal pool complex would be avoided under this alternative due to the absence of impediments from infrastructure. Impacts to three sensitive plant species and five sensitive animal species would still occur and would require the same mitigation as being proposed under the *SUNROAD CENTRUM* project. As with the proposed project, mitigation would reduce impacts to below significant.

This alternative was rejected for various reasons, which include those listed in Section 4.2 of this EIR. Those reasons include: the need to require extensive engineering and analysis to ensure that the new alignment would include acceptable vertical and horizontal radii; the effects upon up to six nearby property owners; and possible impacts to Caltrans' infrastructure plans for the subject area. Also, the primary goal of the East Otay Mesa Specific Plan of encouraging job-creation opportunities and commercial development in the area would not be maximized. This decrease would also result in an indirect effect on the County, due to loss of sales and property tax revenues. Finally, this alternative would be inconsistent with the adopted East Otay Mesa Specific Plan, thus the Specific Plan would need to be amended to allow for the realignment of the Lone Star Road.

**Areas of Controversy**

Short-term cumulative traffic impacts would not be fully mitigated until the completion of the SR-905 improvements.

The proposed land uses may be inconsistent with the Accident Protection Zones being proposed in the Draft Comprehensive Land Use Plan for the Brownfield Cargo Airport project, which is targeted for approval by the City of San Diego Council in June 2000.

**Issues to be Resolved by the Decision Making Body**

1. Should the short-term cumulative traffic impacts be mitigated with temporary measures?



Implementation of the proposed phased project would partially mitigate the short-term cumulative impacts. This cumulative impact would be fully mitigated upon completion of the SR-125 or SR-905 improvements.

2. Should the proposed project be considered inconsistent with the proposed Brown Field Cargo Airport Accident Protection Zones?

If the *SUNROAD CENTRUM* project is approved by the County prior to City-approval of the CLUP, the project will be grandfathered and the CLUP would have to accommodate the proposed uses on the project site.

If the City approves the CLUP prior to County-approval of the *SUNROAD CENTRUM* project, the County may wish to review the project's proposed land uses for potential conflicts with the CLUP's Accident Protection Zones. If a potential conflict arises, the County may choose to present the project to the Airport Land Use Commission for consideration. Even with presentation to the Airport Land Use Commission the *SUNROAD CENTRUM* project would be grandfathered because it is a planned use within the EOMSP that existed prior to any amended CLUP.

# Project Description and Environmental Setting – 1.0

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## CHAPTER 1.0 - PROJECT DESCRIPTION AND ENVIRONMENTAL SETTING

### 1.1 Project Description and Location

The proposed *SUNROAD CENTRUM* project is located in the County of San Diego (Figures 1.1-1, *Regional Map* and 1.1-2, *Project Location*) within the northwest quadrant of the East Otay Mesa Specific Plan area, and is generally bound by Otay Mesa Road on the south, the Specific Plan boundary on the north, Paseo de las Americas on the east and Harvest Road on the west.

Future projects that have been amended or proposed in the vicinity of the project site since certification of the East Otay Mesa Specific Plan EIR include the Brown Field Airport Expansion, Travel Plaza, Otay Mesa Energy Plant, and Truck Storage Facility. The Brown Field Airport project would be located 1,320 feet west of the project site.

The Travel Plaza truck stop would be located at the northeast corner of Enrico Fermi Road and Airway Road, approximately 2,200 feet southeast of the proposed project site. Approximately 5,000 feet southeast of the project site would be the proposed Otay Mesa Energy Plant, which would be located on the northeast corner of Lone Star Road and Alta Road. The Truck Storage facility would be located on the southeast corner of Airway Road and Enrico Fermi Road.

The County's Otay Subregional Plan was amended on December 19, 1990 (GPA 90-04) to incorporate the 3,282-acre East Otay Mesa Specific Plan Area (SPA) and associated development guidelines (see Figure 1.1-3, *East Otay Mesa Specific Plan Area*). The County thereafter initiated the East Otay Specific Plan process in April 1991, and adopted the East Otay Mesa Specific Plan (SP 93-004) on July 27, 1994. The Specific Plan establishes stages of development review required in order to implement a project within the Specific Plan project. Potential environmental impacts associated with the projects proposed in the SPA were analyzed and mitigation measures were proposed in the East Otay Mesa Specific Plan Environmental Impact Report (GPA 94-02; Log Nol 93-19-6), certified by the County on July 27, 1994.

The proposed project, which consists of about 250.5 acres within the East Otay Mesa Specific Plan area would be developed in two phases to partially mitigate traffic impacts associated with the project. Under a worst-case scenario, the first phase would be completed within two years of project approval and would provide for the development of approximately 74 industrial lots on approximately 130 acres. In total, the project would require a balanced cut and fill grading operation of 1.35 million cubic yards of soil. The soils on-site consist of undocumented fill soils, topsoils, alluvial, colluvium, fluvial terrace deposits, sediments of the Otay formation, and hard metavolcanic rocks of the Santiago Peak volcanics.

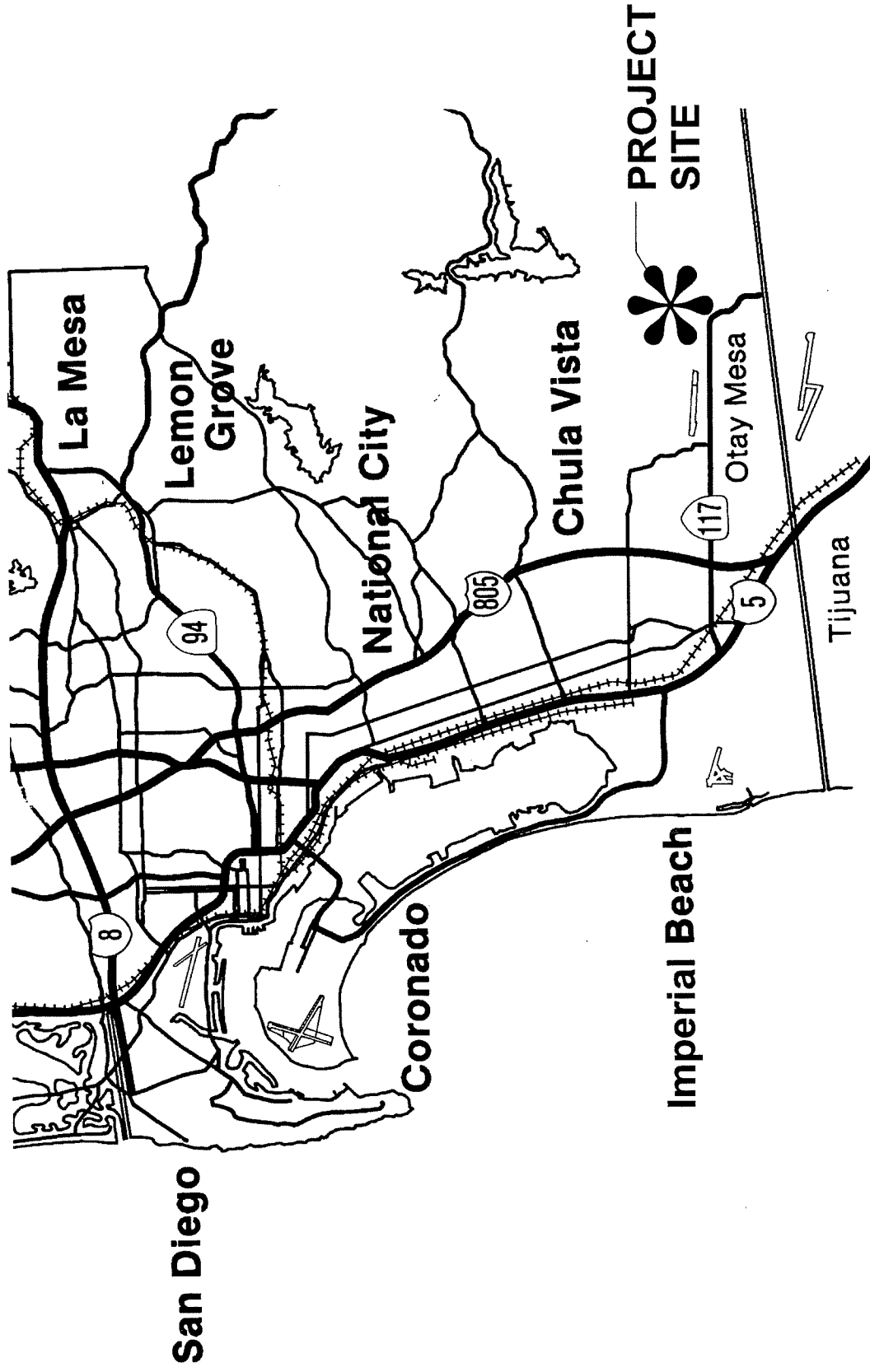


Figure 1.1-1  
REGIONAL MAP



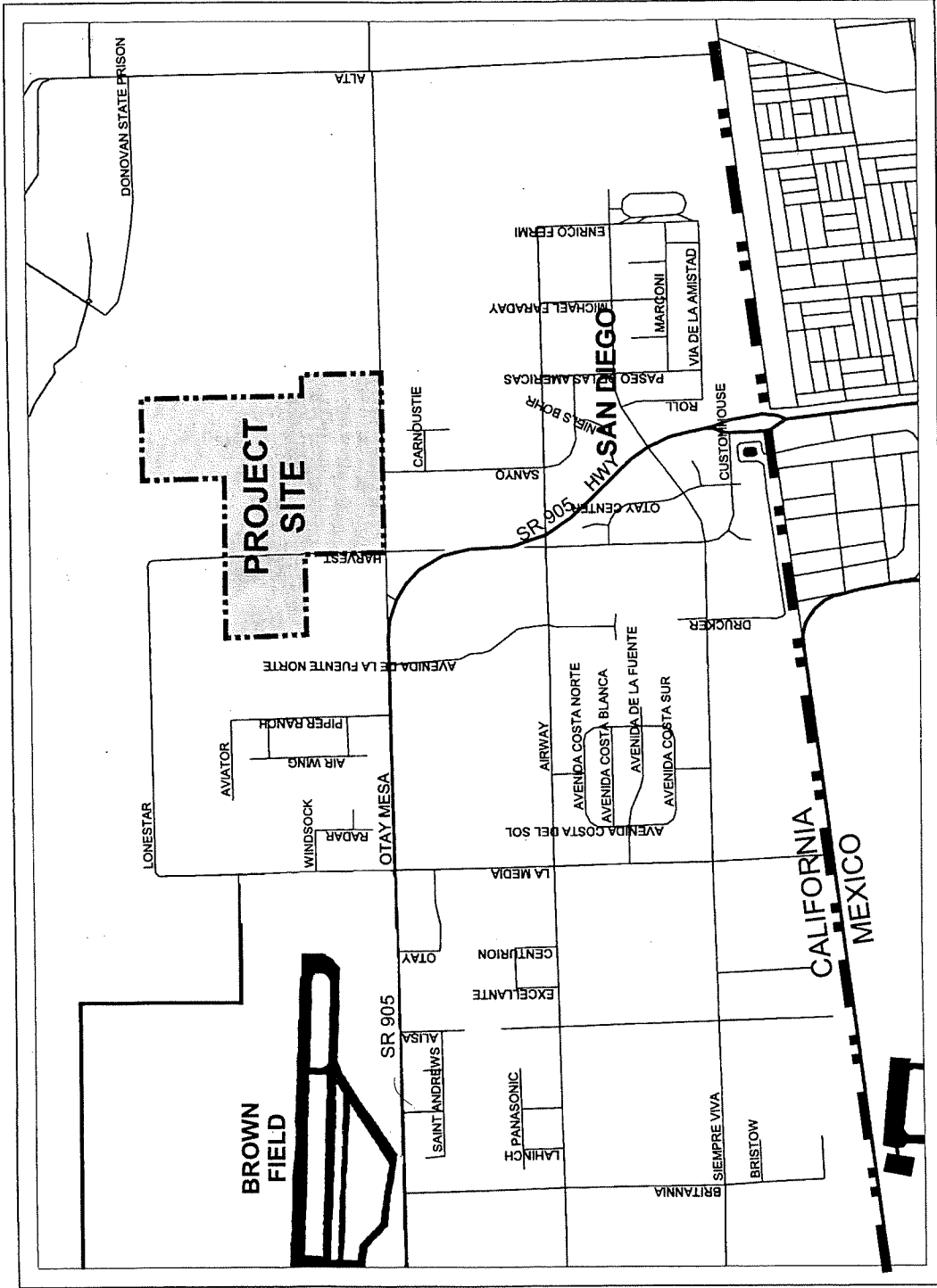


Figure 1.1-2  
PROJECT LOCATION



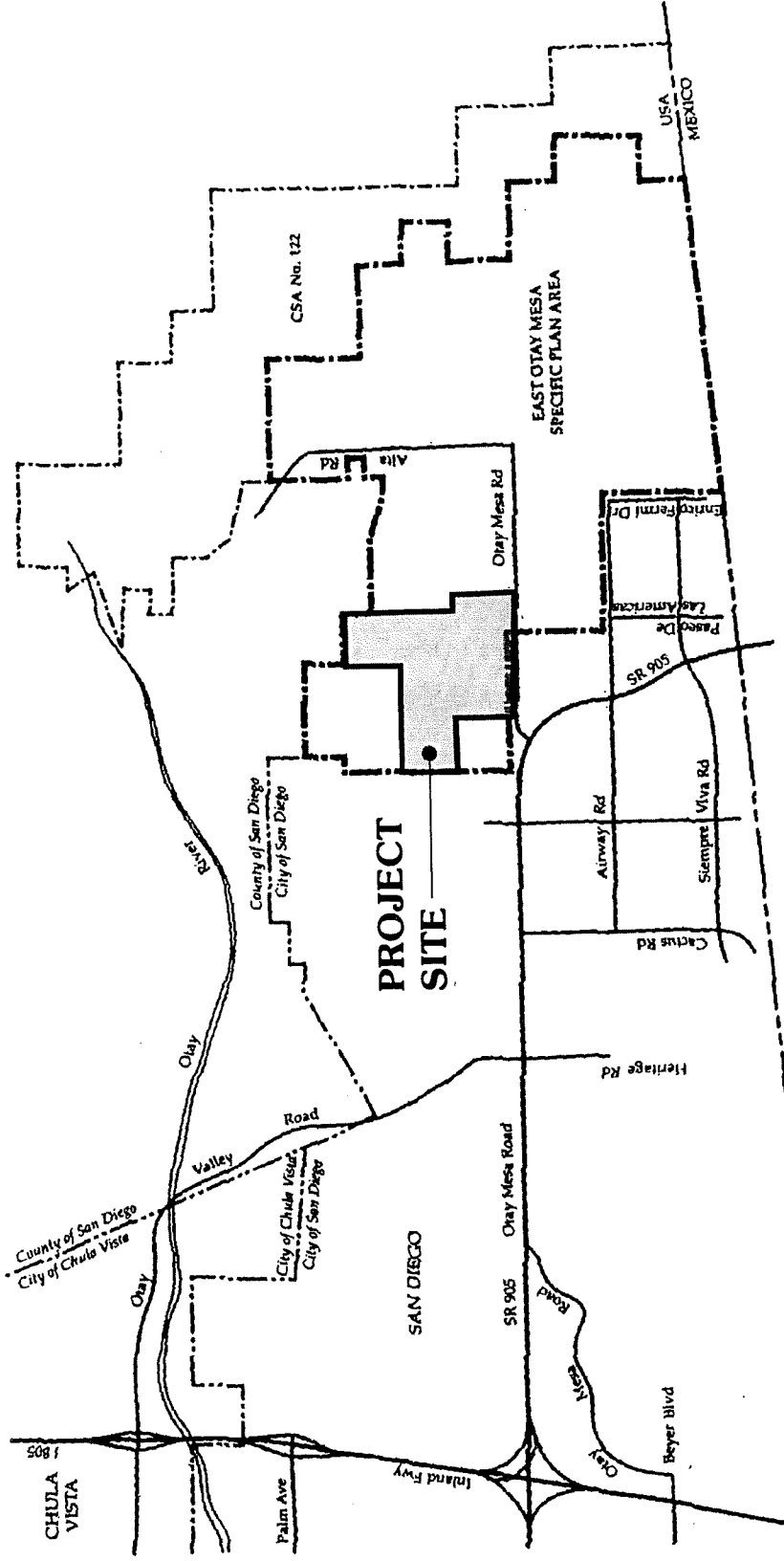


Figure 1.1-3  
 EAST OTAY MESA SPECIFIC PLAN AREA  
 AND JURISDICTIONAL BOUNDARIES



# Project Description and Environmental Setting – 1.0

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~~A 100-foot brush management easement would be placed at the edge of the proposed open space to restrict construction of structures requiring brush management in the open space easement. The majority of the proposed project site is located within the San Diego Rural Fire Protection District (the District), which has existing facilities with the capacity and capability to provide fire protection services to the project site. The project applicant has entered into an agreement with the District. The agreement requires the District to provide services to the entire project site and submit an application to LAFCO for the annexation into the District the approximately 30 acres that are currently outside the District's boundaries.~~

Utility connections for the commercial/industrial uses would be made underground where infrastructure for water, sewer, gas, and electric utilities already exist. The proposed connections are consistent with the Public Facilities Element of the East Otay Mesa Specific Plan. Pursuant to the East Otay Mesa Specific Plan, all storm water would be detained on-site via detention basins. In addition, a water conservation plan would be required for the project that consists of the most recent best management practices, including the use of low flush toilets and low-flow faucets in the project design and drought-tolerant plants in the landscape plans.

An area of about 0.25 acre, consisting of an isolated vernal pool, would be preserved as permanent open space within one of the proposed commercial/industrial lots located near the southeast corner of the proposed intersection of Lone Star Road and Sanyo Ave, and an additional area of about ~~43.24~~ 51.5 acres, consisting of a vernal pool complex and sensitive biological habitat, would be preserved through an open space easement, north of Lone Star Road. Thus, the project would preserve a total of 51.7 acres within and open space easement. A Resource Conservation Plan (RCP) is required by the Specific Plan and would be approved prior to issuance of the grading permit or approval of the final tentative map, which ever occurs first.

Phase II would consist of 22 commercial lots on 34.4 acres west of Harvest Road and would not commence until the opening of either the SR-125 or SR-905. It is anticipated, at this time, that the SR-125 improvements would be completed by the Year 2003 and the SR-905 would be operational by the Year 2005. The SR-905 project would consist of extending SR-905 from I-805 to the Otay Mesa Road entry at the U.S. Mexican border. The new section would run parallel and approximately 1,300 feet south of the existing Otay Mesa Road. The SR-125 project would consist of constructing an eleven-mile stretch of highway from SR-905 to SR-54.

~~The remainder of the proposed project area would consist of public roads and a 51.5-acre Remainder Parcel. This Remainder Parcel would consist of an 8-acre Potential Future Development area and open space. No development is being proposed within the 8-acre Potential Future Development Area. However, if in the future a development proposal for this area is submitted to the County for consideration, a site-specific CEQA review process and Major Amendment Process would be required.~~

# **Project Description and Environmental Setting - 1.0**

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## **1.2 Project Objectives**

The primary objective of the project is to implement the Otay Mesa Specific Plan through the provision of commercial/industrial uses that would create job opportunities, accommodate forecasted growth, protect open space and contribute to the development of infrastructure, streets and a circulation system that would accommodate forecasted public utility and service needs and traffic growth. A second objective is to implement the County MSCP by providing for a minor amendment to the subregional plan that would permanently preserve about ~~43.49~~ 51.7 acres of wetlands/vernal pools and sensitive biological habitat.

## **1.3 Intended Uses of the Supplemental EIR**

On July 27, 1994, a project EIR was certified for the East Otay Mesa Specific Plan, which included an analysis of the impacts associated with the proposed uses on the *SUNROAD CENTRUM* project site. Since that date, a change of circumstances not previously considered in the East Otay Mesa Environmental Impact Report has arisen. Therefore, there is substantial evidence that the project may have significant adverse impacts on the environment and pursuant to CEQA Section 15163, a Supplemental Environmental Impact Report (SEIR) is required. This Supplemental Environmental Impact Report (SEIR) has been prepared to address this change in circumstances and to provide minor changes and additions to the previously certified EIR in order to make the previous EIR adequately apply to the proposed project. As an informational document, together with the previous EIR, it provides decision makers and members of the general public with a complete evaluation of the project. This SEIR has been prepared in accordance with the County of San Diego EIR Format and General Content Requirements and complies with all criteria, standards and procedures of the California Environmental Quality Act (CEQA) of 1970 as amended (Public Resources Code § 21000 *et seq.*) and State EIR guidelines (CAC § 15000 *et seq.*). Per § 21067 of CEQA and §§ 15367 and 15050 through 15053 of State CEQA Guidelines, the County of San Diego is the lead agency under whose authority this document has been prepared.

An Initial Study was conducted for the *SUNROAD CENTRUM* project by the County of San Diego Department of Planning and Land Use. As a result of the Initial Study, the County determined the analyses and discussions presented in the previously certified East Otay Mesa Specific Plan EIR adequately address potential impacts to Geologic Resources, Aesthetics, Water Resources, Hazards, Public Services, Utilities and Services, and Population and Housing resources as they relate to the project site and the proposed *SUNROAD CENTRUM* project. Additional analyses for these issue areas would not be necessary. The County of San Diego determined, during its Initial Study of the proposed project, that implementation of the project would result in potential impacts to the following six issue areas that were either not previously discussed in the East Otay Mesa Specific Plan EIR, or to which there has been a change in circumstance since certification of the original EIR: Land Use, Transportation/Circulation, Air Quality, Noise, Biological Resources, and Cultural and Paleontological Resources. A Notice of Preparation (NOP) for the proposed project, dated September 23, 1999, was prepared and distributed to all Responsible and Trustee Agencies, as well as other agencies and members of the public who may have an interest in the project (Appendix A).

# Project Description and Environmental Setting – 1.0

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## 1.3.1. Matrix of Project Approvals/Permits

The proposed *SUNROAD CENTRUM* project would provide for the development of approximately 250.5 acres through the following actions:

1. Planning Commission review and recommendation of tentative tract map (TM5139RPL) and certification of a Supplemental EIR (see Figure 1.3-1, *Tentative Tract Map*);
2. Planning Commission review and recommendation of a minor amendment of the County's Multiple Species Conservation Program (MSCP) Subregional Plan (see Figure 1.3-2, *MSCP Subregional Plan Minor Amendment Area*);
3. ~~Planning Commission~~ Department of Planning and Land Use Director's review and recommendation of a resource conservation plan (Appendix B of this SEIR).

## 1.3.2. Incorporation by Reference

As permitted by §15150 of the CEQA Guidelines, in addition to the previously certified, original East Otay Mesa Specific Plan EIR and associated original Technical Appendices, this SEIR references several technical studies, analyses and reports, including the project-specific studies contained in the appendices to this SEIR. Information from these documents, which have been incorporated by reference, is briefly summarized in the appropriate section(s), and the relationship between the incorporated part of the referenced document and the SEIR is described. In addition to the project-specific technical reports included in the Appendices, other documents and reference sources which have been used in the preparation of this SEIR are identified in the LIST OF REFERENCES.

## 1.3.3. Responsible and Trustee Agencies

State law requires that all EIRs be reviewed by trustee and responsible agencies. A *Trustee Agency* is defined in §15386 of the State CEQA Guidelines as “a state agency having jurisdiction by law over natural resources affected by a project which are held in trust for the people of the State of California.” Per §15381 of the CEQA Guidelines, “the term “*Responsible Agency*” includes all public agencies other than the Lead Agency which have discretionary approval power over the project.” In the case of the *SUNROAD CENTRUM* project, the Lead Agency is the County of San Diego as defined by §15367 of CEQA. Responsible and/or Trustee agencies which may have discretionary approval over the project or which may have an interest in the project include the San Diego Local Agency Formation Commission, California Department of Fish and Game (CDFG), the U.S. Army Corps of Engineers (ACOE) and the U.S. Fish and Wildlife Service (USFWS), as described below.



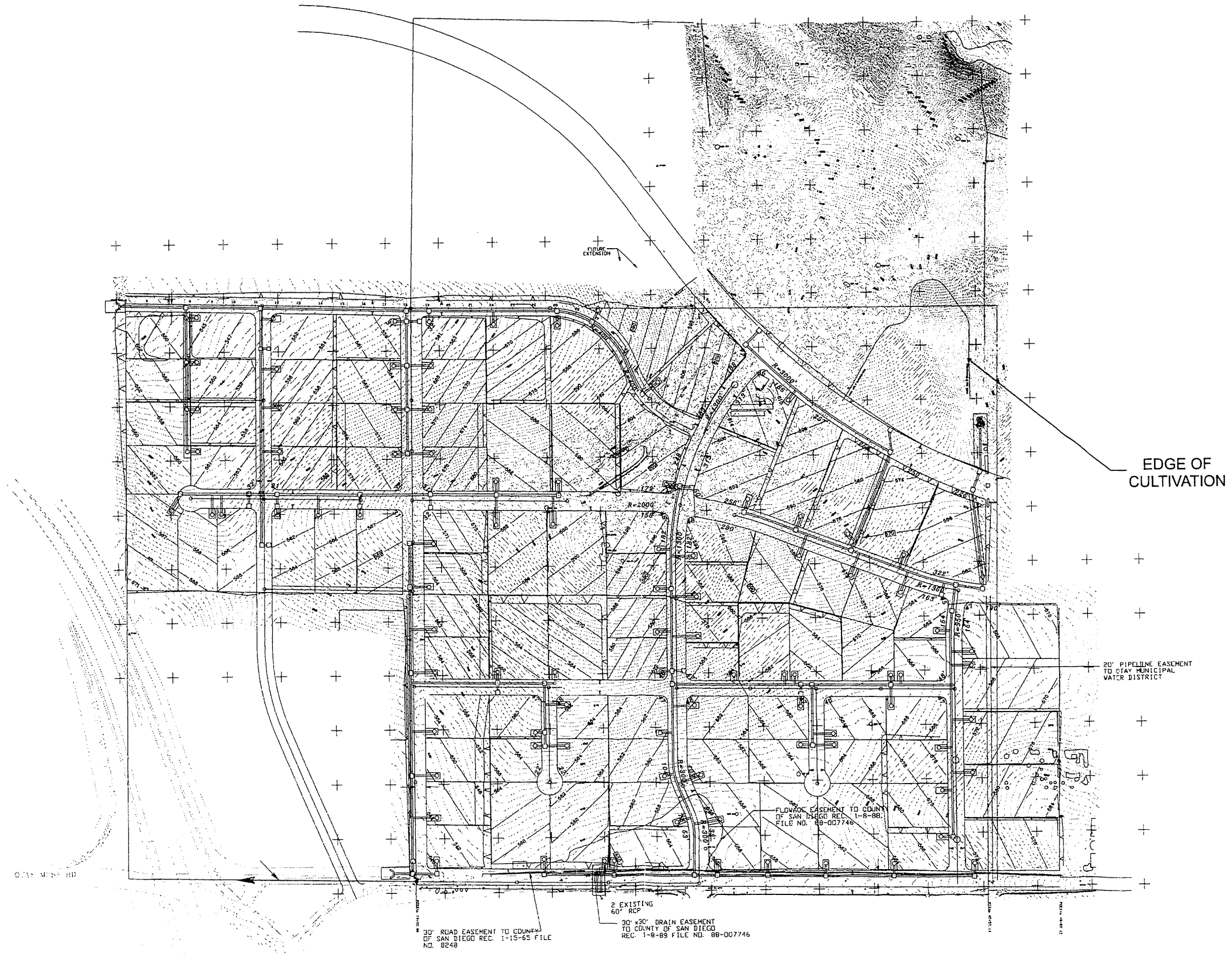


Figure 1.3-1  
TENTATIVE TRACT MAP



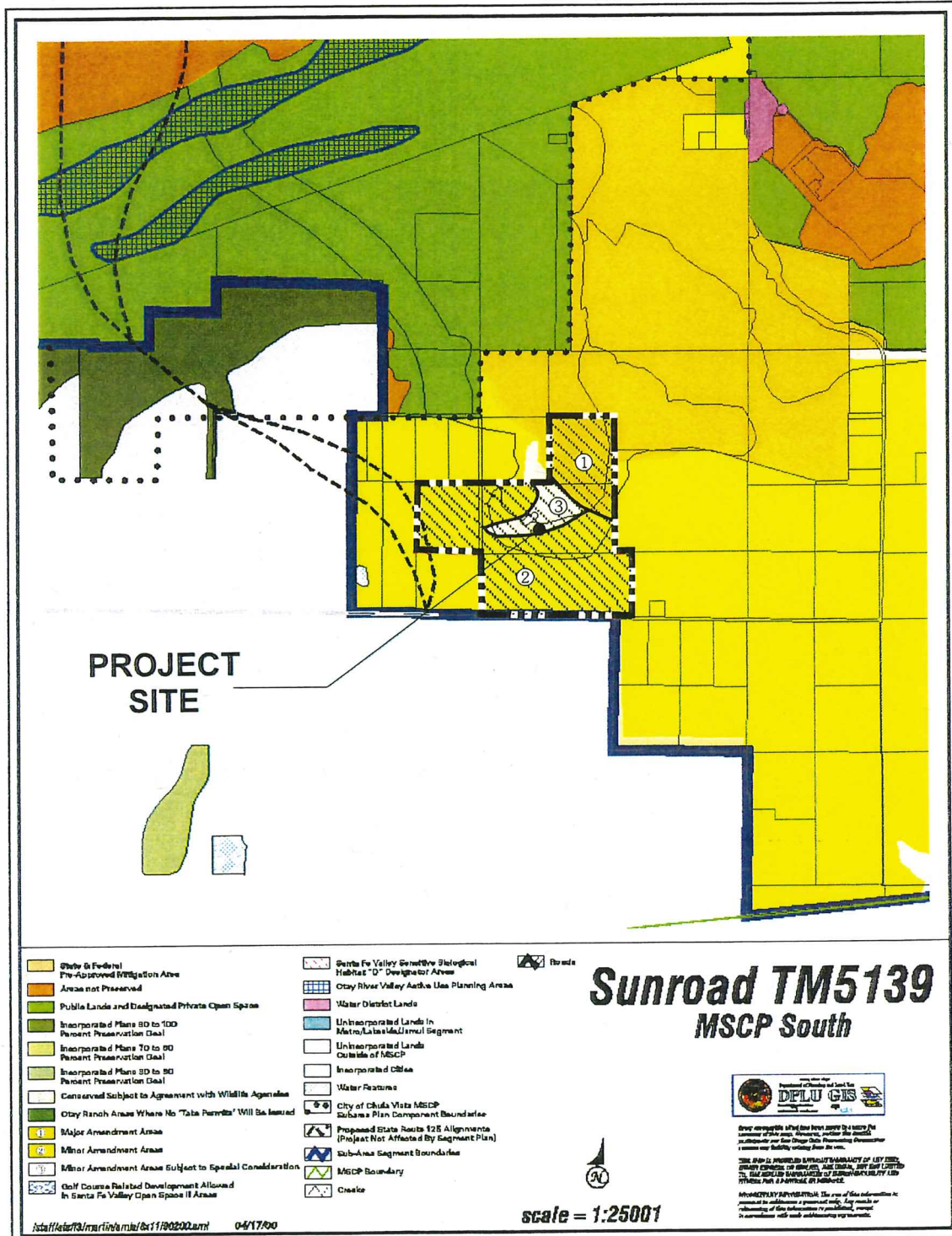


Figure 1.3-2  
MSCP SUBREGIONAL PLAN  
MAJOR AND MINOR AMENDMENT AREA



SOURCE: DARNELL & ASSOCIATES, INC.

SUNROAD CENTRUM SEIR  
Draft: June 29, 2000; Final: December 15, 2000

# Project Description and Environmental Setting - 1.0

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- **San Diego Local Agency Formation Commission (LAFCO)**  
Portions of the project site (approximately 30 acres) are currently outside the San Diego Rural Fire Protection District's jurisdiction boundaries. Accordingly, the San Diego Local Agency Formation Commission (LAFCO) is required to process a government jurisdictional change (e.g. annexation) for the proposed project.
  
- ***California Department of Fish and Game (CDFG)***  
The California Department of Fish and Game (CDFG) has the authority to reach an agreement with an agency or private party proposing to affect intermittent or permanent wetlands habitat, pursuant to Section 1603 of the State Fish and Game Code. In its role as a trustee agency, the CDFG generally evaluates information gathered during preparation of the environmental documentation, and attempts to satisfy their permit concerns in these documents. In accordance with its policy of "no net loss of wetland habitats," the Department requires mitigation for all impacts to any wetlands, regardless of acreage. Where a State-listed threatened or endangered species occurs on a project site, the CDFG would be responsible for the issuance of a Memorandum of Understanding (MOU) to ensure the conservation, enhancement, protection and restoration of State-listed threatened or endangered species and their habitats. In addition, the required resource conservation plan must be approved by the CDFG prior to project implementation.
  
- ***U.S. Army Corps of Engineers (ACOE)***  
The U.S. Army Corps of Engineers (ACOE) has jurisdiction over development in or affecting the navigable waters of the United States, pursuant to two federal laws: the Rivers and Harbors Act of 1889 and the Clean Water Act, as amended. A navigable water is generally defined by a blue line as plotted on a United States Geological Survey (USGS) quadrangle map. Projects that include potential dredge or fill impacts to the "waters of the U.S." (including wetlands) are subject to Section 404 of the Clean Water Act and require a permit. Prior to issuance of that permit, the ACOE must approve a Habitat Mitigation and Monitoring Plan. All permits issued by the ACOE are subject to consultation and/or review by the U.S. Fish and Wildlife Service and the Environmental Protection Agency (EPA). The proposed project would impact 0.11 acre of jurisdictional wetlands. These impacts would require a permit from the ACOE.
  
- ***U.S. Fish and Wildlife Services (USFWS)***  
The U.S. Fish and Wildlife Service is responsible for providing input to the U.S. Army Corps of Engineers as part of the Section 404 process. For those projects that would result in impacts to listed species and/or their habitat, a Resource Conservation Plan must be approved by the USFWS prior to project implementation. Acting under the Federal Endangered Species Act (ESA), the Fish and Wildlife Service is also responsible for ensuring that any action authorized, funded or carried out by a federal agency (such as the Army Corps of Engineers) is not likely to jeopardize the

# Project Description and Environmental Setting – 1.0

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continued existence of listed species or modify their critical habitat. The proposed project would require a 404 permit, therefore the USFWS would provide consultation during the permitting process. In addition, the proposed project would impact and endanger species and sensitive plant and animal species, which will require either require compliance with the MSCP or an endangered species 10A permit. Accordingly, the proposed Minor Amendment to the MSCP and mitigation proposed in the Resource Conservation Plan (Appendix B of this SEIR) would require USFWS-approval.

## **1.4 Environmental Setting**

The *SUNROAD CENTRUM* project is generally located in the northwest quadrant of the East Otay Mesa Specific Plan area. The project site, which has been subject to recurrent agricultural use, consists of relatively flat to rolling topography that rises gently to the north across about four-fifths of the site, where it rapidly drops off to the north and northeast into Johnson Canyon. A creek, located within Johnson Canyon and identified as a fresh water marsh, flows along the northeast corner of the site, and a vernal-pool complex, is situated in the north-central portion of the subject site. The East Otay Mesa Specific Plan EIR identifies the soil content of the site as being alluvium.

A number of trails cross the site in the north and central portions, including a trail proposed as the general alignment of Lone Star Road, a proposed six-lane prime arterial. An unimproved, but graded, segment of Harvest Road, a proposed four-lane commercial/industrial collector road, establishes most of the western boundary of the project site and extends southward from the location of the Lone Star Road alignment to the existing Otay Mesa Road, a proposed six-lane major arterial which exists as a two-lane collector along the southern boundary of the site.

Habitat on the site consists of coastal sage scrub/~~native grassland~~, vernal pools, riparian scrub, disturbed wetland/waters, native grassland, non-native grassland, and disturbed habitat. The disturbed wetland waters and the vernal pool complex exist within the coastal sage scrub.

### **1.4.1 Consistency of Project With Applicable Regional and General Plans**

Development of *SUNROAD CENTRUM* project would be consistent with the policies and criteria stipulated in the County's General Plan, the Otay Subregional Plan and the East Otay Mesa Specific Plan. No inconsistencies between the project and these applicable regional and general plans have been found.

# Significant Environmental Effects - 2.0

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## CHAPTER 2.0 - SIGNIFICANT ENVIRONMENTAL EFFECTS

### Impacts Adequately Analyzed in Previous EIR

An Initial Study was conducted for the *SUNROAD CENTRUM* project by the County of San Diego Department of Planning and Land Use. As a result of the Initial Study, the County determined the analyses and discussions presented in the previously certified East Otay Mesa Specific Plan EIR adequately address potential impacts to Geologic Resources, Landform Alteration/Visual Quality, Hydrology and Water Quality, Health and Safety, Public Services and Utilities, and Population/Employment resources as they relate to the project site and the proposed *SUNROAD CENTRUM* project. Pursuant to Section 15163 of the Guidelines for Implementation of the California Environmental Act, additional analyses for these issue areas are not necessary. The County of San Diego determined, during its Initial Study of the proposed project, that implementation of the project would result in potential impacts to the following six issue areas that were either not previously discussed in the East Otay Mesa Specific Plan EIR, or to which there has been a change in circumstance since certification of the original EIR: Land Use, Transportation/Circulation, Air Quality, Noise, Biological Resources, and Cultural and Paleontological Resources. A Notice of Preparation (NOP) for the proposed project, dated September 23, 1999, was prepared and distributed to all Responsible and Trustee Agencies, as well as other agencies and members of the public who may have an interest in the project

### **Previously Adopted Mitigation Measures Applicable to the Proposed Project**

During the Initial Study process, the County determined that various mitigation measures identified in the East Otay Mesa Specific Plan EIR would still be applicable to the proposed *SUNROAD CENTRUM* and would minimize significant adverse impacts associated with the proposed project. The following mitigation measures presented in italic form would be included in the Mitigation Monitoring and Reporting Program for the proposed project, as would the project specific or updated mitigation measures provided below each italicized measure.

#### Land Use:

Mitigation measures for impacts associated with Land Use inconsistencies are discussed below in Section 2.1.4 of this SEIR.

#### Landform Alteration/Visual Quality:

The specific boundaries for Johnson Canyon shall be defined as the top of the canyon slopes within the Hillside Residential District, and no fill shall be allowed within those boundaries.

As shown on Figure 1.3-1, the Tentative Map does not propose grading in the Hillside Residential District or Johnson Canyon (15% slopes) as defined in the East Otay Mesa Specific Plan EIR.



# Significant Environmental Effects – 2.0

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## Biological Resources:

Mitigation measures for impacts to biological resources are discussed below in Section 2.5.4 of this SEIR.

## Cultural Resources:

Mitigation measures for impacts to cultural resources are discussed below in Section 2.6.4 of this SEIR

## Geology and Soils:

*Site-specific subsurface geotechnical investigations shall be required for each project proposed within the SPA. The investigation will address the issues outlined below, as appropriate.*

*Static and pseudo-static slope stability analyses should be performed for proposed cut and fill slopes.*

*Based on the results of the stability analyses, proposed slopes should be flattened to reduce slope inclination or earth-fill buttresses with or without supplemental reinforcement (such as shear pins or geogrid reinforced soil) should be constructed.*

*Selective site grading (i.e., remove expansive soils and replace with granular non-expansive soils) should be performed.*

*Foundations should be designed in accordance with UBC standards.*

A site-specific geotechnical study has been prepared for the proposed project and is on file at the County of San Diego.

## Hydrology and Water Quality:

*As Basins B and H of the Otay River and Johnson Canyon Watersheds are developed, provisions shall be made to construct onsite detention facilities, storm drain facilities, energy dissipaters, and erosion control to ensure that runoff exiting developed areas does not cause downstream impacts in O'Neal Canyon and Johnson Canyon. These provisions should be developed and implemented as a comprehensive plan which considers inputs from all properties within the basin.*

Storm water flows on site would be directed to detention basins located on each lot. Desilting and storm water flow devices would be installed at each catch basin within each of the detention basins to restrict the storm water flows and amount of sediment entering the storm water drainage system. The proposed tentative map identifies the location of storm

## Significant Environmental Effects – 2.0

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drain facilities and de-silting basins to ensure that runoff from the project site does not cause impacts to Johnson Canyon. In addition, the above State Law restricts peak storm water flows entering Mexico to existing peak flows. Consequently, the storm water flows that would be released from the on-site detention basins would not exceed existing flows. A NPDES permit for construction and operational activities will be required for the project in which a Storm Water Pollution Prevention Plan (SWPPP) will be developed prior to issuance of grading permits. The SWPPP shall include the following measures.

*During construction, the following measures should be included in construction plans to prevent erosion and offsite transport of sediment:*

- Application of mulch (stone or straw) to disturbed soil to reduce erosional effects or rain impact, and sheet and rill erosion.*
- Establishment of buffer zones at the down-gradient boundaries of disturbed areas to prevent wash-off into channels. Buffer zones may be vegetative (grass) or hay bales. Buffer zones serve to reduce overland flow velocities and trap eroded sediment which would otherwise migrate toward drainage channels.*
- Construction of siltation basins in drainage channels to capture sediment.*
- Consultation with local office of the Soil Conservation Service for technical guidance and options in erosion prevention and control.*

*After project construction, drainage exiting impervious surfaces to unpaved areas shall be diverted to suitable structures such as energy dissipaters prior to flowing into natural drainages in order to avoid impacts due to erosion.*

As note above, all drainage would be directed to detention basins located on each lot on-site, thus ensuring that no drainage would directly flow into the natural open space areas upon completion of the proposed project.

*The County and property owners will comply with the Best Management Practices of the Clean Water Act in order to reduce potential water pollution runoff from industrial properties.*

Per the Clean Water Act, a NPDES permit for industrial activities will be required for the project in which a Storm Water Pollution Prevention Plan (SWPPP) will be developed prior to occupancy of each lot. The SWPPP shall include Best Management Practices that would reduce the potential for runoff from industrial properties.

### Transportation and Circulation:

Mitigation measures for impacts to transportation and circulation are discussed below in Section 2.5.4 of this SEIR

# Significant Environmental Effects – 2.0

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## Noise:

Mitigation measures for impacts to noise are discussed below in Section 2.2.4 of this SEIR

## Air Quality:

Mitigation measures for impacts to air quality are discussed below in Section 2.6.4 of this SEIR

## Health and Safety:

*The transport of hazardous substances on existing and future roadways within the East Otay Mesa SPA shall be conducted in accordance with the California Code of Regulations (CCR) and the Code of Federal Regulations (CFR). These regulations identify Department of Transportation (DOT) approved methods for packaging and containerizing hazardous substances and site-appropriate options and procedures relative to the handling and transportation of these substances.*

Vehicles transporting hazardous materials shall conform with the current CCRs and CFRs.

## Public Services and Utilities:

*Water Service: Domestic water demand shall be reduced through the inclusion of the most recent "Best Management Practices" water conservation measures as defined by the MWD and the CWA. In accordance with the requirements of the Otay Subregional Plan, a Water Conservation Plan shall be prepared to document these measures. The water conservation measures shall then be identified and listed as a condition of tentative map or precise plan approval.*

A Conservation Plan that includes typical water conservation measures for industrial/commercial uses shall be approved by the County prior to issuance of grading permits. This plan would consist of the most recent best management practices, including the use of low flush toilets and low-flow faucets in the project design and drought-tolerant plants in the landscape plans.

*Wastewater Service: No development beyond that which can be served by the initial 1.0 mgd capacity (i.e., 400 net acres of industrial or commercial development) shall be allowed until long-term sewer service capacity has been provided. This solution could be either of the two alternatives currently under consideration. However, no development shall be allowed until all of the necessary infrastructure has been constructed and the necessary treatment plants are operable.*

A signed Project Facility Availability Form from the East Otay Mesa Sewer Maintenance District is on file at the County of San Diego. That form indicates that there are facilities



# Significant Environmental Effects – 2.0

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available to serve the project site and would be made available by East Otay Mesa Sewer Maintenance District.

*Solid Waste: To mitigate the project-specific impacts related to solid waste disposal once the Otay/Otay Annex landfill is closed, tentative maps beyond those allowed under Phase I of the SPA (up to 400 net acres) shall not be approved by the County unless a goodwill serve letter from the County of Public Works, Solid Waste Division can be obtained. In the event that none of the landfill sites prove feasible, East Otay Mesa property owners might not have sufficient capacity in the South County Area to support future development.*

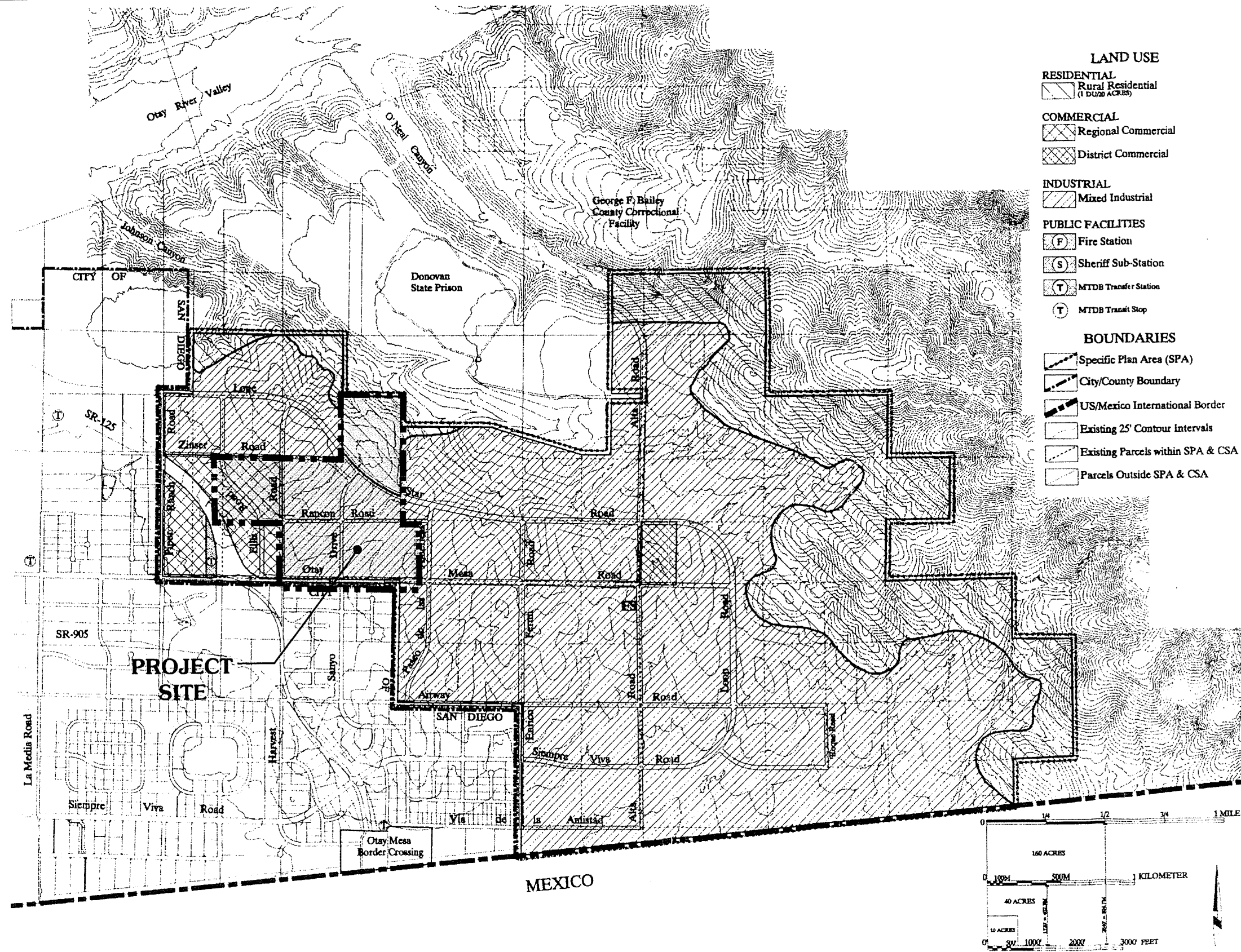
The proposed project would be the first 250.5 acres approved within the Specific Plan area. Therefore, solid waste from the project site would be disposed of at the Otay Landfill and the project would be allowed to go forward without a goodwill serve letter from the County Department of Public Works.

## **Additional Analyses Required for the Proposed Project**

The County of San Diego determined, during its Initial Study of the proposed project, that implementation of the project would result in potential impacts to land use, transportation/circulation, air quality, noise, biological resources, and cultural and paleontological resources because there has been a change in circumstance since certification of the East Otay Mesa Specific Plan EIR that would result in impacts not previously analyzed. Accordingly, additional analyses are required to determine the potential impacts to the six issue areas, and the results of those analyses are discussed below.

### **2.1 Land Use**

The Specific Plan EIR addressed the land use impacts associated with the implementation of the East Otay Mesa Specific Plan, which proposed to develop 3,282 acres of unimproved land with industrial, residential, and supporting commercial land uses (see Figure 2.1-1, *East Otay Mesa Specific Plan Land Use Map*). As shown in Figure 2.1-1, the proposed *SUNROAD CENTRUM* project site was included in the impact analyses for the East Otay Mesa Specific Plan (EOMSP) EIR. The proposed project is substantially the same as the proposed uses described in the SPA project, and no amendment to the Specific Plan is proposed; thus, the proposed project uses do not have to be re-evaluated for land use impacts. However, three years after the certification of the EIR and the adoption of the SPA, the County designated ~~portions of the project site~~ the proposed development area as a Minor Amendment Area within the County's South County Segment of the Multiple Species Conservation Program (MSCP) Subarea Plan. In addition, the County designated the 51.5 acres north of Lone Star Road as a Major Amendment Area within the MSCP. Because the 51.5 acres would be preserved within an open space easement in perpetuity, a Major Amendment to the MSCP is not required. However, a Minor Amendment to the MSCP would be required for the proposed development area. The MSCP was established to provide conservation goals and criteria for habitat and individual species for each segment of the San Diego County Subarea Plan. Therefore, the project and the proposed minor amendment need to be evaluated for consistency with the



- LAND USE**
- RESIDENTIAL**  
 Rural Residential (1 DU/20 ACRES)
- COMMERCIAL**  
 Regional Commercial  
 District Commercial
- INDUSTRIAL**  
 Mixed Industrial
- PUBLIC FACILITIES**  
 Fire Station  
 Sheriff Sub-Station  
 MTDB Transfer Station  
 MTDB Transit Stop
- BOUNDARIES**  
 Specific Plan Area (SPA)  
 City/County Boundary  
 US/Mexico International Border  
 Existing 25' Contour Intervals  
 Existing Parcels within SPA & CSA  
 Parcels Outside SPA & CSA

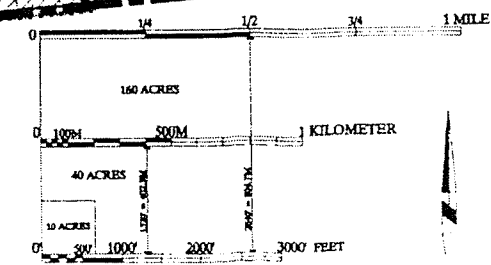


Figure 2.1-1  
 EAST OTAY MESA  
 SPECIFIC PLAN LAND USE MAP

MSCP Subarea Plan.

## 2.1.1 Existing Conditions

The *SUNROAD CENTRUM* project site encompasses 250.5 acres of undeveloped land located east and west of Harvest Road and immediately north of Otay Mesa Road in the County of San Diego, California. Although the project is located in the County, the roads that link the project site in the Otay Mesa area are in the City of San Diego. The property is nearly flat-lying to steeply sloping with elevation ranging from approximately 630 Mean Sea Level (MSL) in the central portion of the site to approximately 430 feet MSL at the bottom of Johnson Canyon, near the site's northeastern corner. Mound and swale ("mima mound") topography characterizes the relatively horizontal mesa top located in the north-central portion of the property.

Existing improvements consist of Harvest Road (a dirt road) located along the western property line, several unnamed dirt roads trending east-west at the center over the existing knoll, an abandoned small gravel or reservoir pit in the north-central portion, and several buried and surface irrigation lines. Natural drainage is mainly a divergent network of shallow swales and ravines that ultimately discharge into Johnson Canyon to the northeast or into controlled facilities, along Otay Mesa Road to the south. Vegetation is dense and primarily consists of non-native grasslands with brush on the steeper slopes. The central-north section of the site is covered with extensive amounts of end-dump fill soils, trash, and debris.

Historically, the flatter portions of the site were farmed. However, agricultural activities haven't occurred on-site in the last 25 to 30 years. In April, 1994, the EOMSP EIR was certified by the County of San Diego and the Specific Plan was subsequently approved in July, 1994, thus changing the land use designations to residential and open space uses (north of Lone Star Road) and industrial and commercial uses (south of Lone Star Road). Since that adoption, development has not occurred on-site. Adjacent land uses consist of industrial uses to the south, open space and Johnson Canyon to the north, designated commercial uses and planned SR-125 improvements to the west, and designated industrial uses to the east. No residences are located on-site or adjacent to the site. The Donovan State Prison is located to the north on the other side of Johnson Canyon, about 3,960 feet away. Brown Field Airport is located to the west of the proposed SR-125 improvement, about 1,320 feet away.

## 2.1.2 Thresholds of Significance

Land use designations are specified in approved general, community, and specific plans within the County of San Diego. In addition, a portion of the project site is designated as a Minor Amendment Area within the MSCP. Therefore, the significance of land use impacts associated with the proposed project was determined by comparing the proposed land uses with those uses, goals and policies approved in the East Otay Mesa Specific Plan and the MSCP.

# Significant Environmental Effects – 2.0

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## 2.1.3 Analysis of Project Effects and Determination as to Significance

The County prepared an Initial Study for the proposed project and released it as a part of the Notice of Preparation for public review on September 23, 1999. That Initial Study determined that the proposed *SUNROAD CENTRUM* project would not conflict with the Specific Plan, because the proposed uses (commercial and industrial) would be consistent with the proposed uses and zoning identified in the Specific Plan. In addition, the proposed project would be consistent with the goals and policies of the various elements (land use, conservation and open space, circulation, urban design, public facilities) and regulatory provisions of the Specific Plan.

In addition, the County analyzed the potential for conflicts with applicable environmental plans or policies adopted by agencies with jurisdiction over the project. The initial study determined that the project would not conflict with environmental plans or policies adopted by other agencies such as, the California Regional Water Quality Control Board, San Diego Air Pollution Control District, California Department of Fish and Game, U.S. Fish and Wildlife Service, State Department of Health Services, and the County Department of Environmental Health.

### 2.1.3.1 MSCP Consistency Analysis and Potential Impacts Associated with the Proposed Minor Amendment to the MSCP

The Initial Study identified a potential conflict with the recently adopted MSCP Subarea Plan. The MSCP states: “any project approved by the County within the County Subarea Plan of the MSCP must be in conformance with the MSCP Plan and the Subarea Plan”. Accordingly, because a portion of the proposed development (198.7 acres) was designated as a Minor Amendment Area of the County’s MSCP Subarea Plan (see Figure 1.3-2), the proposed project and associated minor amendment to the MSCP must be evaluated for consistency with the MSCP. The goals and criteria of the MSCP are based on the needs of 85 species and an analysis of their habitats in the MSCP study area. In addition, the MSCP was established to conserve core areas and linkages within the individual segments of the Subarea Plan.

The project is located in the South County Segment of the Subarea Plan. Within that segment the location of the preservation and development areas was not resolved for all of the land within this Segment. Those areas were designated major or minor amendment areas, and the County’s Take Authorizations (the County’s authority to allow additional development without biological mitigation) do not apply until a major or minor amendment process has been complete. Accordingly, the proposed project would require an amendment, which would allow for the proposed preservation, re-creation and enhancement of habitat within the Major Amendment area on-site and acquisition and preservation of habitat off-site as permanent open space and development in some portions of the designated Minor Amendment area. Pursuant to Section 1.14 of the County’s MSCP Subarea Plan, the amendment process has been initiated by the County at the request of the applicant, and the

## Significant Environmental Effects – 2.0

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proposed minor amendment would require the approval of the USFWS and CDFG. Upon obtaining local, state, and federal approval, the site can be developed as proposed and the on-site habitat could be partially or completely eliminated (with appropriate mitigation) without significantly affecting the overall goals of the Subarea Plan.

The project site also contains Minor Amendment areas that are subject to special requirements specified in the MSCP. These areas (see Figure 1.3-2) contain sensitive habitat and species and would require mitigation as a part of the minor amendment process. The MSCP "Special Requirement" areas overlap portions of the "G" Designator or Sensitive Resource Area Regulation areas as defined in the East Otay Mesa Specific Plan (EOMSP). The "G" Designator was placed on those areas that contain biologically sensitive resources (e.g. vernal pools, coastal sage scrub, disturbed wetlands). The EOMSP defines biologically sensitive resources, which include wildlife corridors, sensitive habitats with a high potential to support species, and wetlands, such as vernal pools. Accordingly, prior to approval of the tentative map, a Resource Conservation Plan (RCP) shall be approved by the County for parcels with a "G" Designator. The RCP shall include mitigation for impacts for biological resources on the those parcels and shall conform with the goals of the MSCP and BMO. Those special requirements relate to those portions of the site that are also within the "G" Designator or Sensitive Resource Area Regulation areas. These areas contain steep slopes (15% slopes), and biologically sensitive resources (e.g. vernal pools) on the Conservation Plan in the EOMSP.

### Previously Analyzed Land Use Impacts

The East Otay Mesa Specific Plan area EIR identified potential impacts associated with the implementation of the Specific Plan. Of those impacts identified, the following impacts would potentially occur as a result of the proposed *SUNROAD CENTRUM* project:

*Land use interface impacts between ... future residences, ...[and the proposed] onsite industrial development, ....;*

Typical impacts of industrial or commercial development on residential development include lighting and noise impacts. Other potential impacts could include exposure of residents to industrial pollution or risks associated with hazardous materials.

The proposed project is not proposing to develop residential uses ~~at this time~~ and the proposed industrial uses south of Lone Star Road, would be located at least 1,300 feet south of the nearest off-site designated residential uses. The residential uses (approximately 500 feet in elevation) would be further separated from the industrial uses (approximately 600 feet in elevation) by a 630-foot mesa located between the two uses on the proposed open space easement. Only minimal security lighting would be used during the evening hours. Given the great distance and intervening landform, there will be no lighting impacts on the off-site designated residential uses.

# Significant Environmental Effects – 2.0

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*Incompatibility between the future 60 CNEL noise contour of Brown Field with the proposed Hillside Residential district north of Lone Star Road;*

The Specific Plan EIR identified potential impacts associated with the proposed expansion of the Brown Field Airport. The Specific Plan EIR determined that noise levels may extend into the Hillside Residential district within the Specific Plan; thus, resulting in potentially significant impacts to future residences in the SPA. The proposed *SUNROAD CENTRUM* project is not proposing residential uses ~~at this time~~ in the designated Hillside Residential District. ~~If in the future residential uses are proposed, a site-specific noise analysis would be required.~~

*Inconsistencies with goals and preliminary plans for the Otay Valley Regional Park for the area on, and around, Johnson Canyon.*

The Specific Plan EIR determined that implementation of the Specific Plan Area (including the proposed project) would impact the plans for the Otay Valley Regional Park by precluding preservation of the Canyon as natural open space and a continuous trail through the project site. Accordingly, mitigation measures were identified (listed below) that would reduce the potential impacts to a level below significant.

The proposed industrial/commercial lots would be located outside and to the south of the Otay Valley Regional Park Planning Area (see Figure 3-5 in the Specific Plan EIR). In addition, in those areas where the Park's Planning Area and proposed Trail System does intersect the project site, the proposed on-site open space designations would preserve the Park's plans for leaving those areas for natural open space.

## **2.1.4 Mitigation Measures**

### **2.1.4.1 Mitigation for Potential Impacts Associated with the Proposed Minor Amendment to the MSCP**

To mitigate potential impacts associated with the proposed Minor Amendment to the MSCP, a minor amendment and RCP must be approved by the County of San Diego, USFWS, and CDFG, prior to project commencement. In addition, the proposed open space uses located in the area north of Lone Star Road (51.5 acres) and south of Lone Star Road (.25 acre) and identified as the Remainder Parcel must be determined to be consistent with MSCP.

### **Mitigation for Previously Identified Land Use Inconsistencies**

*To mitigate inconsistencies with proposed land use in Johnson Canyon between the East Otay Mesa Specific Plan and the Otay Valley Regional Park Progress Plan map, the County shall re-evaluate each proposed plan and come to an agreement on which type of land use is the most appropriate for the canyon, i.e., Hillside Residential and Industrial development as proposed by the East Otay Mesa Specific Plan or Natural Open Space Preserve as*



## Significant Environmental Effects – 2.0

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*proposed by the park's Progress Plan map. The two plans shall be revised, as needed, to provide for consistent land use designations between the two proposed land use maps.*

The proposed industrial/commercial lots would be located outside and south of the Planning Area for the Otay Valley Regional Park. There will be approximately 1,200 linear feet of natural open space to act as a buffer between the proposed project and the uses (i.e. recreational trail corridor) designated in the park's Progress Plan map. Accordingly, a plan revision would not be required.

### 2.1.5 Conclusions

The Specific Plan EIR identified potentially significant impacts associated with the incompatible land uses between: the designated residential units off-site and the proposed industrial/commercial uses and the Otay Valley Regional Park plans and the proposed uses near Johnson Canyon within the Specific Plan Area. Given the great distance between the two uses, there would be no lighting impacts on the off-site designated residential uses. The proposed industrial/commercial uses would be located outside the Otay Valley Regional Park planning area. Mitigation measures identified in the Specific Plan EIR would reduce the potentially significant impacts to a level below significant. In addition to the previously analyzed land use impacts, this SEIR determined that the proposed project would have a significant impact on the goals and policies of the MSCP Subarea Plan. However, with agency-approval of the Minor Amendment and Resource Conservation Plan, the impact would be reduced to a level below significant.

## 2.2 Noise

The East Otay Mesa Specific Plan EIR analyzed the potential impacts to off-site noise-sensitive receptors associated with the designated on-site industrial/commercial and residential uses. Since the certification of the East Otay Mesa Specific Plan EIR and adoption of the Specific Plan, the nearby Brown Field Airport expansion project (see the 1999 Airport Master Plan Study) has been proposed; thus causing a change in circumstances and requiring an analysis of the impacts associated with the activities associated with that project. Accordingly, during the Initial Study, the County determined that the change in noise contributions from this source may have a potentially significant impact to the proposed *SUNROAD CENTRUM* project. Industrial and commercial uses are not considered noise sensitive, but are required to contain noise within their property lines at a level of 70 to 75 dBA CNEL and 60 dBA CNEL respectively.

### 2.2.1 Existing Conditions

The *SUNROAD CENTRUM* project site encompasses 250.5 acres of undeveloped land located east and west of Harvest Road and immediately north of Otay Mesa Road in the County of San Diego, California. The property is nearly flat-lying to steeply sloping with elevation ranging from approximately 630 Mean Sea Level (MSL) in the central portion of the site to approximately 430 feet MSL at the bottom of Johnson Canyon, near the site's northeastern

# Significant Environmental Effects – 2.0

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corner. There is no development and no sensitive receptors on-site. The project site is not generating noise or subject to noise impacts from surrounding land uses. The Brown Field Airport to the west and existing traffic traveling on Old Otay Mesa Road are the only two existing sources of noise adjacent to the site.

## 2.2.2 Thresholds of Significance

The noise element of the General Plan for the County of San Diego established community noise standards which identify compatible noise levels for noise sensitive areas (e.g. off-site residential uses or on-site environmentally sensitive lands). According to the noise element, a significant noise impact would occur when a proposed development generates an excess of 60 dBA CNEL at any noise sensitive area. The San Diego County Noise Ordinance limits the allowable noise level generated at property lines for industrial and commercial uses; 70-75 dBA CNEL and 60 dBA CNEL respectively.

## 2.2.3 Analysis of Project Effects and Determination as to Significance

### Noise Impacts Not Previously Analyzed

Because specific uses have not yet been selected within the designated industrial/commercial use areas, and because compliance with the standards contained in the noise ordinance would be mandatory, no significant noise impacts are anticipated with respect to noise levels generated from industrial/commercial uses. Based on the Initial Study prepared for the *SUNROAD CENTRUM* project, a site-specific noise assessment (Appendix C of this SEIR) was prepared to analyze the potential impacts to noise-sensitive receptors (off-site residential and on-site environmentally sensitive lands).

There are two main sources of noise that would impact the noise sensitive land uses upon development of this project. The first and more significant of the two is traffic noise on Lone Star Road, and the second is airplane noise from airplanes approaching the Brown Field airport.

The East Otay Mesa Specific Plan EIR projected traffic estimates of 15,000 vehicles per day on Lone Star Road. Travel speeds are expected to be moderate with some start/stop effects at the anticipated future Lone Star/Sanyo traffic signal. However, it is the County's policy to base the acoustical impact analysis upon theoretical roadway capacity, if there is uncertainty in the phasing of future transportation system improvements (i.e. the proposed SR-125 and SR-905 improvements). Accordingly, a daily traffic volume of 44,600 average daily traffic (ADT) was used instead of the 15,000 ADT because the higher ADT represents the capacity for a 6-lane prime arterial, as designated in the EOMSP. The study determined that there are no existing off-site residential uses that would be impacted by the traffic noise generated on Lone Star Road. There are designated rural residential land uses ~~both on- and~~ off-site, north of Lone Star Road, that would be potentially impacted by traffic noise. Accordingly, if and when residential uses are proposed within the designated rural residential



## Significant Environmental Effects - 2.0

land use areas, a site-specific noise study and subsequent CEQA-review process would be required to determine traffic-noise related impacts. Consequently, the noise-impact assessment focused on determining the potential impacts to the proposed open space uses within the Remainder Parcel. The Remainder Parcel would consist of about 43 51.7 acres of an open space easement, of which would contain a proposed wetland mitigation site and existing vernal pools - no other uses are being proposed at this time. The results of the traffic-noise study are presented in Table 2.2-1, *Worst-Case Noise Exposures*.

**Table 2.2-1**  
**WORST-CASE NOISE EXPOSURES**

Distance From Centerline of Lone Star Road (feet)	Noise Levels (dBA CNEL)
50	81
100	78
200	75
400	72
800	69
1000	68
1260	67
1500	66
2000	64
3000	61
3100	60

According to the results in that table, noise-sensitive uses within 1,260 feet north of the centerline of Lone Star Road (includes all of the Remainder Parcel) would experience traffic-generated noise from Lone Star Road that would exceed the County's standard (60 dBA Leq). Because the proposed project would not propose any noise sensitive uses within areas that exceed the County's noise standards and wildlife species expected to occur within traffic-related noise areas would not be considered noise sensitive, no noise-related impacts would occur. Consequently, potential adverse effects on animal communities within the Remainder Parcel would require mitigation (see Section 2.3.3 of this SEIR). In addition, in 1994 the County placed a "G" Designator over the proposed Remainder Parcel. Accordingly, the County will require a site-specific noise study for any future uses outside the proposed

# Significant Environmental Effects – 2.0

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wetland mitigation site/open space easement within the Remainder Parcel.

The Remainder Parcel proposed for the northern portion of the project site would be located outside the 60 dBA CNEL for the proposed Brown Field Airport expansion project (see Figure 2.2-1, *Projected Aircraft Produced CNEL Contours for Brown Field (Year 2000)*). The noise generated from traffic on Lone Star Road combined with the noise from the anticipated airport activities, would expose on-site environmentally-sensitive lands to a 60-dBA CNEL or higher.

## Previously Analyzed Noise Impacts

The East Otay Mesa Specific Plan EIR determined that implementation of the Specific Plan would result in potentially significant noise-related impacts. ~~Of those impacts, the following~~ None of those noise-related impacts would occur as a result of the proposed project:

~~It was determined that the future traffic noise may significantly impact the noise sensitive land uses adjacent to all roadway segments included in the noise analysis:~~

~~The future project-related traffic noise may significantly impact off-site noise sensitive land uses adjacent to Otay Mesa Road:~~

~~Construction, modification and use of the transportation network and the construction and operation of commercial and industrial facilities could significantly impact existing and future noise sensitive land uses:~~

## 2.2.4 Mitigation Measures

~~The mitigation measures listed below would reduce the noise-related impacts to a level below significant. The mitigation measures consist of those measures that will reduce impacts from newly identified impacts in this SEIR and those measures from the East Otay Mesa Specific Plan EIR that would apply to the proposed project.~~

### ~~Mitigation for Newly Identified Noise-Related Impacts~~

~~Prior to County approval of grading plans, the mitigation measures for *Indirect Impacts to Biological Resources (Human Activities)* proposed in the Resource Conservation Plan (RCP) (Appendix B of this SEIR) and Section 2.3.4 of this SEIR shall be implemented.~~

Impacts associated with noise are not anticipated. Therefore, no mitigation is required.

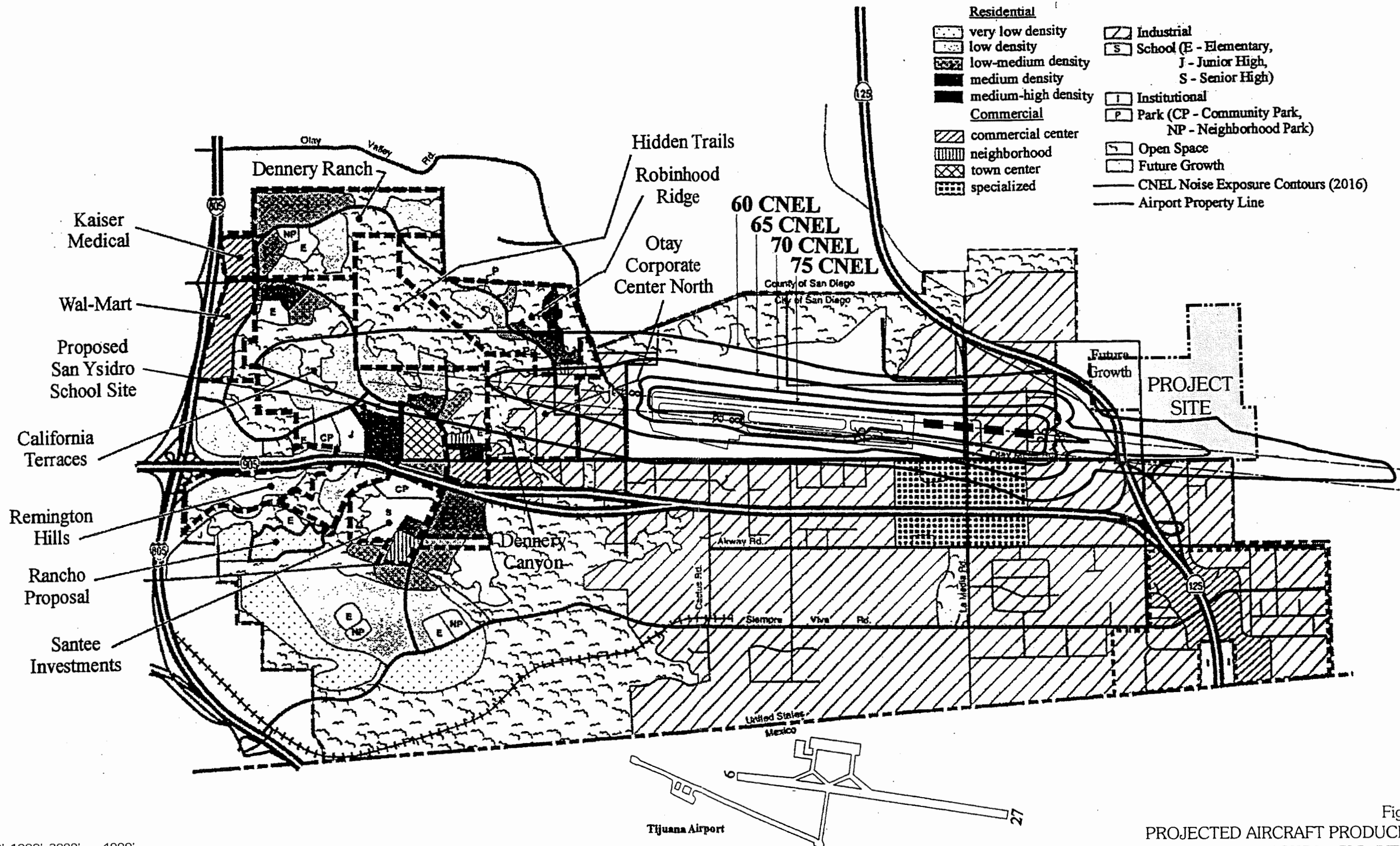


Figure 2.2-1  
 PROJECTED AIRCRAFT PRODUCED CNEL  
 CONTOURS FOR BROWN FIELD (YEAR 2000)

## Significant Environmental Effects – 2.0

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### Mitigation Measures for Previously Identified Noise-Related Impacts

~~Traffic Noise: Noise sensitive land located within the estimated 60 CNEEL noise contour (Table 4.87 and Figure 4.8-3 of the East Otay Mesa Specific Plan EIR) shall have a site-specific noise study prepared to identify specific mitigation measures. Mitigation measures may include noise barriers (wall, berm, or a combination of both); set-backs from the roadway; and interior mitigation such as sound rated window and doors and forced air-circulation that would allow for closed window conditions.~~

A site specific noise study has been prepared for the proposed project. The site-specific noise study concludes that the mitigation measure proposed in the RCP (Appendix B of this SEIR) shall mitigate traffic-related noise impacts associated with sensitive uses within the Remainder Parcel to a level below significant. A site-specific noise study and subsequent CEQA review process shall be required for any future uses within the Remainder Parcel.

~~Industrial/Commercial Noise Sources: In general, the siting of industrial and commercial uses shall be such that moderate to high noise producing operations are located farther from noise sensitive receptors (i.e., noisy industrial/commercial land uses should be located in the center of the industrial areas) and low noise producing operations are located nearer noise sensitive receptors (i.e., quieter industrial/commercial land uses should be located in the periphery of the industrial areas). Any industrial or commercial development in proximity to the area designated for residential use and to areas that contain California gnatcatcher habitat, must include the preparation of a site-specific acoustical analysis that assesses noise impacts and demonstrates that the proposed facility design would be operated in compliance with the County Noise Ordinance and the Federal Endangered Species Act.~~

The industrial uses that may generate moderate to high noise producing operations located south of Lone Star Road shall be located in the center of the designated industrial use area. The site specific noise study prepared for the project site did not identify the proposed industrial uses to the south of the proposed Remainder Parcel as potential noise sources. In addition, during the biological survey (see Appendix B) the California gnatcatcher was not observed on site.

~~Construction Noise: All construction operations in the East Otay Mesa Specific Plan area shall comply with the San Diego County Construction Noise Ordinance (Section 36.410). Furthermore, all construction operations. The requirement for compliance with the construction noise standard shall be explicitly stipulated in each contract and permit for construction.~~

The proposed project shall comply with the construction noise standards stipulated on each grading/building permit.

# Significant Environmental Effects – 2.0

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## 2.2.5 Conclusions

~~Noise-sensitive uses (wetland mitigation site and open space easement) within the Remainder Parcel would experience noise-related impacts generated from traffic on Lone Star Road that would exceed the County's standard (60 dBA Leq). Mitigation measures proposed in the RCP and Section 2.3.4 of this SEIR would mitigate the potential impacts to biological resources within the Remainder Parcel to a level below significant. Any future uses proposed outside the open space easement and wetland mitigation site within the Remainder Parcel will require a site-specific study and CEQA-review process. The East Otay Mesa Specific Plan EIR identified potential impacts to off-site noise-sensitive receptors associated with the designated on-site industrial/commercial and residential uses. Because the proposed project would not propose any noise sensitive uses within areas that exceed the County's noise standards and wildlife species expected to occur within traffic-related noise areas would not be considered noise sensitive, no noise-related impacts would occur. Therefore, no mitigation is required.~~

## 2.3 Biological Resources

The proposed project site consists of 250.5 acres of the 3,300-acre East Otay Mesa Specific Plan area. Subsequent to the consideration and adoption of the East Otay Mesa Specific Plan and certification of the Specific Plan EIR, the San Diego and Riverside fairy shrimp and the Quino checkerspot butterfly were listed as endangered species. In addition, the prostrate navarretia was listed as threatened by USFWS. During the Initial Study process, a survey of the site determined that the San Diego Fairy Shrimp were present on the project site and the Riverside Fairy Shrimp had the potential to occur onsite, and development of the project site would have the potential to impact a small portion of isolated wetlands identified in the Specific Plan area. No adult or larval Quino Checkerspot Butterflies were observed on-site during the course of the Spring 1999 survey effort for the proposed project site. Although the Navarretia was observed during the 1991 survey for the Specific Plan, it was not identified during the recent surveys. In addition, and subsequent to consideration of the Specific Plan and certification of the Specific Plan EIR, the Multiple Species Conservation Program (MSCP) Subarea Plan and Biological Mitigation Ordinance (BMO) were adopted by the County of San Diego. The MSCP Subarea Plan sets forth a Minor Amendment area within the proposed development site, and the BMO establishes mitigation ratios for impacts to specified vegetation communities, sensitive plant and wildlife species known to exist within the project area. Accordingly, a discussion of the project's impacts and their relationship to the MSCP and the BMO requirements are provided below.

Additional analysis ~~is~~ was required for the proposed off-site improvements to Otay Mesa Road and connection to SR-905. Accordingly, the following discussion evaluates the impacts to vegetation communities, and sensitive plant and wildlife species, and potential conflicts between the proposed project and the environment arising from the aforementioned changes in conditions and the extension of Otay Mesa Road, which was not been previously analyzed in the East Otay Mesa Specific Plan EIR. However, the survey results indicate that an likely improvement to Otay Mesa Road would not significantly impact natural resources and would not result in significant noise or traffic impacts.

## Significant Environmental Effects - 2.0

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The majority of the information and the impact analyses contained herein is derived from the 1993 East Otay Mesa Specific Plan Biological Technical Report (Ogden, 1993) and the *Sunroad Centrum Biological Technical Report* (REC Consultants Inc., ~~1999~~ 2000), contained in Appendix B of this SEIR. The 2000 report incorporates findings from the 1993 surveys conducted by Ogden and the findings from surveys that were conducted in 1998 and 1999 by REC. REC conducted the more current surveys to confirm habitat types (including vernal pools) and document plant and animal species (including the quino checkerspot butterfly, Riverside fairy shrimp, and San Diego fairy shrimp). On August 31, and September 6, 2000, County staff and REC conducted another survey of the on-site vegetation and coast barrel cacti. The results of that survey are provided in Appendix B as an addendum to the Biological Technical Report.

### 2.3.1 Existing Conditions

The 250.5-acre project site is located in the community of East Otay Mesa in the County of San Diego on an undeveloped and generally flat land, with the exception of the mesa located in the northern portion of the site. Johnson Canyon is adjacent and to the north of the project site. On-site elevations range from approximately 445 feet above mean sea level (AMSL) at the northeastern corner of the project site to approximately 625 feet AMSL on the mesa near the central portion of the property. The soils, in some areas, have a heavy clay component.

Various roads surround and traverse the project site. Some of which are dirt roads and others are half dirt and half paved. These roads include Otay Mesa Road, bordering the southern property line, Sanyo Avenue, traversing in a north-south direction through the middle of the site, and Harvest Road, bordering portions of the eastern property line and traversing eastern portions of the project site. Most of the project site has been disturbed by agricultural (vegetable farming) and grazing activities. Agricultural activities have not occurred on-site within the last 25-30 years. These activities created the agricultural pond located on-site, which has since been abandoned. In addition, various trash piles occur on the site that contain wood debris, irrigation materials, and plastic sheeting. Illegal dumping of tires, furniture, and other debris has occurred on-site.

The native habitats on the project site have been altered in the past due to former agricultural activities and urban development. Time has allowed much of the area to self restore. The proposed project site does not meet the definition of a linkage as defined in the Biological Mitigation Ordinance. However, a portion of the site (most of which will be preserved) in the northeastern corner is contiguous with larger blocks of habitat, the site is otherwise surrounded by disturbed or developed lands.

Johnson Canyon and open space areas are adjacent and to the north of the project site. Portions of Johnson Canyon and its slopes encompassed by the project site will be preserved in order to maintain a wildlife corridor between the Otay River Valley to the north and the Otay Mountains to the east. Preservation of Johnson Canyon and its slopes as a wildlife corridor is consistent with the East Otay Mesa Specific Plan. The western and eastern

## Significant Environmental Effects – 2.0

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portions of the project site are adjacent to undeveloped land within the East Otay Mesa Specific Plan area, of which are designated for similar commercial and industrial uses. The north lanes of Otay Mesa Road make up a portion of the southern property boundary of the project site. South of Otay Mesa Road is an existing industrial complex.

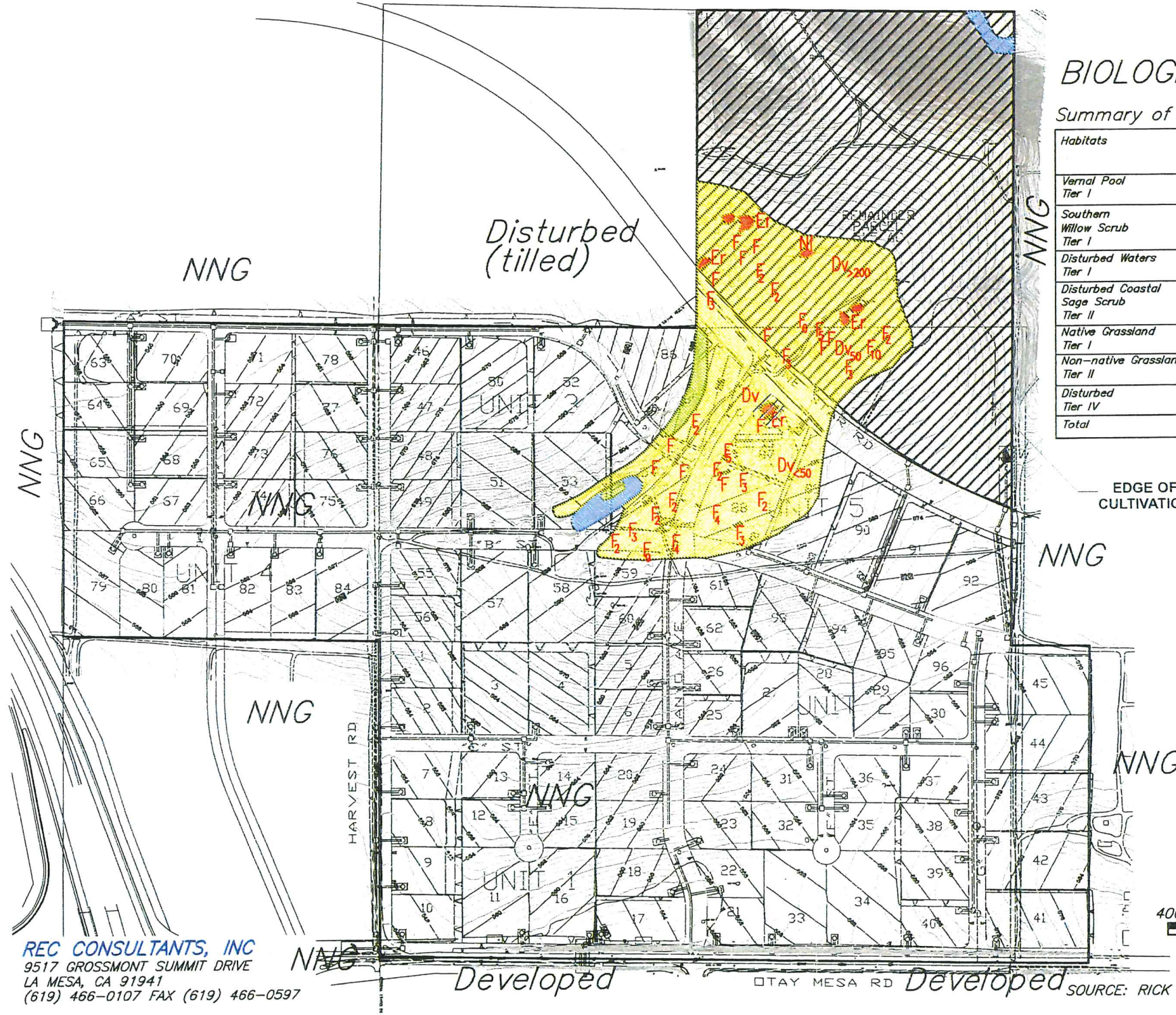
The project maintains regional connectivity of the open space preserved on-site and the overall effectiveness of the MSCP preserve design. In order for the project to be approved, the project requires compliance with the MSCP, Biological Mitigation Ordinance (BMO), and ESA.

### Vegetation

Figure 2.3-1, *Existing Vegetation and Sensitive Species*, depicts the existing vegetation and sensitive species occurring on the project site. ~~Six~~ Seven vegetation types occur within the project site including: vernal pools, disturbed wetlands/waters, coastal sage scrub, riparian scrub, native grassland, non-native grassland, and disturbed habitat. Vegetation associations onsite are discussed below and mapped in accordance with the County of San Diego Biological Mapping Guidelines (County of San Diego, 1998). In addition, the mapping effort was reviewed in the field by county staff and adjustments made in consultation with staff. A complete list of plant species observed onsite is included in Appendix B of this SEIR.

**Vernal Pools:** Vernal pools are a highly specialized plant habitat occurring on mesa tops that support unique plant species. Vernal pools consist of slight depressions on otherwise level mesa tops that fill with rainwater during the winter months. Once filled, the water does not drain off or percolate away due to the flat topography and underlying clay pan soil layers that impede drainage. Seven vernal pools were found in the northeastern section onsite. The vernal pools complex is well described in the East Otay Mesa SPA Plan, and is summarized here. The conditions in this area remain the same as those previously reported. The vernal pool complex, which include several vernal pools, is situated on a mesa just south of Johnson Canyon, and occurs in a matrix of coastal sage scrub with a native grass component. Characteristic scrub species in this matrix include California buckwheat (*Eriogonum fasciculatum*), California sagebrush (*Artemisia californica*), flat-topped golden yarrow (*Eriophyllum confertiflorum*), deerweed (*Lotus scoparius*), coastal prickly pear (*Opuntia littoralis*), purple needlegrass (*Nassella pulchra*), slender wild oat (*Avena barbata*), rosin weed (*Calycadenia tenella*), lilac mariposa (*Calochortus splendens*), fascicled tarweed (*Hemizonia fasciculata*), foxtail fescue (*Vulpia myuros* var. *hirsuta*), Australian saltbush (*Atriplex semibaccata*), Russian thistle (*Salsola australis*), and cat's ear (*Hypochoeris glabra*) on the mound areas, and goldenbush (*Isocoma menzesie*), nodding stipa, mesa brodiaea (*Brodiaea jolonensis*), blue-eyed grass (*Sisyrinchium bellum*), and pin clover (*Erodium botrys*) in the lower lying areas outside the actual pools. Species at the margins of pools include Italian ryegrass (*Lolium perenne*), toad rush (*Juncus bufonius*), and grass poly (*Lythrum hyssopifolia*).





### BIOLOGICAL RESOURCES MAP

Summary of Project Impacts and Mitigation Measures

Habitats	Total Onsite	Impacts	Ratio of Mitigation	Total Mitigation Needed	Onsite Open Space	Offsite Mitigation Required
Vernal Pool Tier I	0.2	0.0	N/A	0.0	0.2	0.0
Southern Willow Scrub Tier I	0.6	0.2	2:1 creation	0.4	0.4	0.4 creation
Disturbed Waters Tier I	0.1	0.1	2:1 creation	0.2	0.2 creation	0.2
Disturbed Coastal Sage Scrub Tier II	5.4	2.1	1.5:1	3.2	3.2	0.0
Native Grassland Tier I	7.3	4.2	2:1	8.5	3.1	5.4
Non-native Grassland Tier II	231.2	186.5	0.5:1	93.3	44.7	48.6
Disturbed Tier IV	5.9	5.9	0:0	0.0	0.0	0.0
<b>Total</b>	<b>250.7</b>	<b>199.0</b>			<b>51.6</b>	

EDGE OF CULTIVATION

**LEGEND**

- Open Space
- Non-native Grassland (NNG) (42200)
- Vernal Pool (44322)
- Southern Willow Scrub (63320)
- Freshwater Marsh (52410) (Disturbed Waters)
- Dist. Coastal Sage Scrub (CSS) (Includes 5.39 Ac of CSS (32520) & 7.29 Ac of Native Grasslands (NG) (42100) & 13.79 Ac of NNG (42200))
- Eryngium aristulatum*
- Dudleya variegata*
- Ferocactus viridescens*
- Navarretia fossalis*
- (within each vernal pool) San Diego Fairy Shrimp

REC

400' 0' 400' 800' 1200'

GRAPHIC SCALE: 1"=400'

REC CONSULTANTS, INC  
 9517 GROSSMONT SUMMIT DRIVE  
 LA MESA, CA 91941  
 (619) 466-0107 FAX (619) 466-0597

SOURCE: RICK ENGINEERING, SEPT. 12, 2000

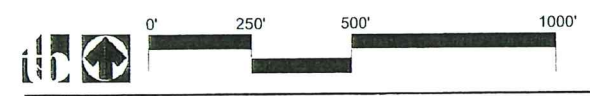


Figure 2.3-1  
 EXISTING VEGETATION  
 & SENSITIVE SPECIES



## Significant Environmental Effects - 2.0

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One federally listed vernal pool plant species, the San Diego button celery (*Eryngium aristulatum* ssp. *parishii*), listed as an endangered species, was identified in the five pools onsite during the more recent surveys. The prostrate navarretia, listed as threatened, was identified during the previous surveys conducted for the EOMSP EIR, however, it was not observed during the current surveys. Other species found onsite throughout the pools include woolly marbles (*Psilocarphus brevissimus*), pale spike-sedge (*Eleocharis macrostachya*), and flowering quillwort (*Lilaea scilloides*). These pools also have a distinct presence of oat (*Avena* sp.) and black mustard (*Brassica nigra*), indicative of previous disturbance. The watershed of the vernal pools on-site total approximately 0.21 acres within the coastal sage scrub general habitat. One area of inundation, associated with the former agricultural uses of the site, did not support any vernal pool plant indicator species and was dominated almost exclusively by pale spike rush. This area is described below under disturbed wetland/waters.

**Disturbed Wetlands/Waters:** As part of the historical agricultural activities on the property an old abandoned agriculture pond was constructed onsite (see Figure 2.3-1, *Existing Vegetation and Sensitive Species*). It was used in the past to water crops and/or as a watering hole for grazing cattle. Water was evidently pumped in, since there is currently little water held by the pond. The area of ponded water is 0.02 acre. The bottom of the pond is not flat and undulates. Only at its deepest location does the pond hold water after rain. The bank of the pond supports clusters of mulefat (*Baccharis salicifolia*), tamarisk, and a few willows (*Salix* sp.) with mostly grasses and non-native forbs, pale spike-sedge (*Eleocharis macrostachya*), and bare ground occurring in the bottom of the pond. The banks of the agricultural pond (0.20 acre), while supporting some wetland species, were not considered part of the jurisdictional area by the Army Corps of Engineers or the U.S. Fish and Wildlife Service. The banks are considered jurisdictional wetlands by the Department of Fish and Game (per Section 1603) and the County of San Diego (per RPO). A great deal of trash, glass and agricultural debris occurs on the bottom and sides of this pond. The second disturbed wetlands/waters, just north of the agricultural pond, is an area that holds water after rain. The area does not drain since a small berm on the west side was created during the agricultural activities. This area supports spike sedge almost exclusively and no vernal pool indicator species. This area comprises 0.09 acre and is designated as freshwater marsh on Figure 2.3-1. Therefore, the total jurisdictional wetland/waters area equals 0.11 acres.

**Coastal Sage Scrub/Non-Native Grassland Mix:** Coastal sage scrub habitat is comprised of low, soft-woody subshrubs. This habitat type is drought-deciduous, occurring typically on low-moisture availability sites such as dry slopes and hillsides or on clay-rich soils (Holland, 1986). Onsite, coastal sage scrub occurs on the central portion of the site, surrounding the vernal pools and agricultural pond. This area appears to have been cleared in the past for agricultural uses and/or grazing. The coastal sage has a strong component of non-native species such as brome grasses, wild oats (*Avena* sp.) and mustard (*Brassica nigra*). However, native coastal sage scrub species such as California sagebrush (*Artemisia californica*), buckwheat (*Eriogonum fasciculatum*) and prickly pear (*Opuntia littoralis*) are scattered throughout the disturbed coastal sage scrub habitat. ~~In addition, patches of native grassland species occur within this habitat dominated by purple needlegrass (*Nasella*~~

## Significant Environmental Effects – 2.0

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*pulchra*), and numerous forbs such as blue-eyed grass (*Sisyrinchium bellum*), mesa brodiaea (*Brodiaea jolonensis*), golden star (*Muilla clevelandii*), and shooting star (*Dodecatheon*). This habitat onsite comprises approximately ~~27.5~~ 5.4 acres.

**Disturbed Southern Willow Scrub:** Southern willow scrub is a dense, broad-leaved winter deciduous association dominated by several species of willow often with young emergent sycamores or cottonwoods. This habitat onsite occurs in the north east corner of the site within Johnson Canyon and in small patches at the agricultural pond. This habitat onsite is disturbed and has patches of tamarisk and arundo with sparse willows and mulefat. This habitat comprises approximately 0.556 acre onsite.

**Native Grassland:** The native grassland habitat onsite occurs primarily in the low lying areas around the mima mounds. This habitat is dominated by bunch grasses, such as purple needlegrass (*Nasella pulchra*), and annual forbs such as mesa brodiaea (*Brodiaea jolonensis*), blue-eyed grass (*Sisyrinchium bellum*), golden star (*Muilla clevelandii*), shooting star (*Dodecatheon*), and blue dicks. The total native grassland on site equals 7.3 acres.

**Non-Native Grassland:** Non-native grassland is a dense to sparse cover of annual grasses. This habitat type is often associated with native annual forbs, occurring on fine-textured soils moist during the winter rainy season and very dry during the summer and fall (Holland, 1986). Onsite, non-native grassland dominates most of the site occurring throughout the northeast, western, and southern portion of the site. This area appears to have been cleared in the past for agricultural and/or grazing. The non-native grassland is dominated by wild oats (*Avena* sp.), brome grasses, sweet fennel (*Foeniculum vulgare*), and mustard (*Brassica nigra*). This habitat overall equals approximately ~~216.24~~ 231.2 acres, however approximately 64% (~~138~~ 148 acres) of this habitat has been under agriculture in the recent past and is dominated by dense stands of mustard and fennel and support little to no grasses. However, based on the MSCP habitat definitions this area has also been designated as non-native grassland. In addition, the alignment of the proposed off-site Otay Mesa Road extension would impact 0.13 acre of this habitat. This area is similar to the non-native grassland onsite, however it has been extensively disturbed from trash dumping and trucks parking and turning-around in the area.

**Disturbed/Developed:** Disturbed/Developed land consists of Harvest Road, an unpaved road which runs north to south across the entirety of the site and the northern half of Otay Mesa Road, a paved road, which forms the southern boundary of the project site. Disturbed/developed land totals 5.89 acres.

### Wildlife

The majority of the site is old agricultural and pasture land, therefore, is currently comprised of non-native grasslands, and dense mustard stands. Due to dominance of non-native grasslands and agricultural fields in the region, wildlife diversity is limited. The vast area of non-native grassland, however, does provide valuable raptor foraging areas. The coastal

## Significant Environmental Effects - 2.0

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sage scrub provides habitat for wildlife species and the grassy slopes of Johnson Canyon. A complete list of wildlife species observed onsite is included in Appendix B of this SEIR.

Nineteen species of birds, one reptile, one amphibian, four mammal and seven insects were detected onsite during the 1998 survey. Representative species of the grassland habitat onsite include meadowlarks, Anna's hummingbird, song sparrow, and goldfinches. Species observed adjacent to the agricultural pond and riparian scrub habitat included song sparrow, common yellowthroat, and red-winged blackbird. In 1993, a survey for the California gnatcatcher was conducted during the analysis for the EOMSP EIR and was not observed. During current protocol surveys (1998 and 1999), again the gnatcatcher was not observed. Regardless, any potential impacts to gnatcatcher habitat would be covered by the project's inclusion in the MSCP.

### Sensitive Resources

**Plants:** Sensitive plants include those listed by the US Fish and Wildlife Service (USFWS, 1996), California Department of Fish and Game (CDFG 1997) and California Native Plant Society (CNPS - Skinner and Pavlick, 1994) and previous candidates for listing. The CNPS listing is sanctioned by the CDFG and essentially serves as its list of candidate species for listing. The MSCP Subarea Plan recently adopted by the County Board of Supervisors stipulates that the County regulates populations of certain sensitive plants and animals within the boundaries circumscribed in the MSCP Subarea plan. The MSCP allows the County to sanction some takes of state and federally listed species as designated within the plan, in accordance with the guidelines outlined with the MSCP. The project site is within the MSCP but a portion of the site is considered a minor amendment area, which requires approval from the resource agencies prior to approval from the County for impacts to sensitive resource.

The project site supports three sensitive plant species: a small scattered population of barrel cactus (*Ferocactus viridescens*) within the coastal sage scrub, button celery (*Eryngium aristulatum*) in four of the vernal pools, and variegated dudleya (*Dudleya variegata*) also scattered in the coastal sage scrub. One additional sensitive plant species was identified during past surveys and is presumed to still exist onsite: prostrate navarretia, (*Navarretia fossalis*) would be expected to occur within the vernal pool sites. The prostrate navarretia was listed as threatened by the USFWS after certification of the Specific Plan EIR. Table 2.3-1, *Sensitive Plant Species on the Sunroad Centrum Project Site*, identifies those species considered sensitive that have the potential to occur onsite and assesses their potential to occur onsite.

**Animals:** Sensitive Animal species are those listed by federal state and local agencies, as well as by scientific organizations. The USFWS officially lists sensitive species as either threatened or endangered, or proposed for listing as threatened or endangered. Additional species receive federal protection under the Bald Eagle Protection Act and the Migratory Bird Treaty Act and Convention for the Protection of Migratory Birds and Animals.

# Significant Environmental Effects – 2.0

**Table 2.3-1**

**SENSITIVE PLANT SPECIES ON THE SUNROAD CENTRUM PROJECT SITE**

Common Name	Scientific Name	Status*	Location
Button Celery	<i>Eryngium aristulatum</i>	USFWS: Endangered CDFG: Endangered CNPS Rating: 1B 2-3-2 MSCP: Covered Species	During surveys conducted in 1991 this species was reported in the J22 vernal pool complexes. The species was located again during the 1998 surveys for this project in four of the seven vernal pools on-site.
San Diego Barrel Cactus	<i>Ferocactus viridescens</i>	USFWS: None; previously listed as Candidate 2 CDFG: None CNPS: List 2, 1-3-1 MSCP: Covered species	This species has been documented in the study area and primarily occurs scattered within the disturbed coastal sage scrub habitat onsite. Approximately <del>100</del> 47 individuals occur onsite (see addendum in Appendix B).
Variiegated dudleya	<i>Dudleya variegata</i>	USFWS: None, previously listed Candidate Category 2 CDFG: None CNPS rating: List 1B, 2-2-2 MSCP: Covered Species, Narrow Endemic	This species occurs onsite in several locations. Previous population size estimated approximately 360 individuals onsite. Current surveys revealed a population size ranging from 100 to 200 individuals. This number discrepancy is most likely due to date of survey.
Prostrate Navarretia	<i>Navarretia fossalis</i>	USFWS: Threatened CDFG: None CNPS rating: List 1B 2-3-2 MSCP: Covered Species	This species was not observed onsite during recent surveys, however was located during the 1991 surveys for the SPA plan. During the 1991 survey season approximately 12 individuals of prostrate navarretia were detected in the vernal pool complex.

\* An explanation of the status codes is provided in Appendix B of this SEIR.

## Significant Environmental Effects – 2.0

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The CDFG also lists species as threatened or endangered, or candidates for listing as threatened or endangered. Lower sensitivity animals may be listed as species of special concern (Remsen 1978; Williams 1986; CDFG 1996, 1996). The CDFG further classifies some species under the following categories: fully protected, protected furbearer, harvest species, protected amphibian, and protected reptile. The designation “protected” indicates that a species may not be taken or possessed except under special permit from the CDFG; “fully protected” indicates that a species can be taken only for scientific purposes. The designation “harvest species” indicates that take of the species is controlled by the state government. Sensitive wildlife species observed onsite are identified within Table 2.3-2, *Observed Sensitive Wildlife Species*. Sensitive wildlife species with the potential to occur on-site are listed in Appendix B of this SEIR.

**Sensitive Habitat Lands:** The County’s Resource Protection Ordinance (RPO) protects sensitive habitats. Sensitive habitats are those which are considered rare in the region, support sensitive plants or animals, or are listed by the Conservation Element of the General Plan for the county of San Diego. The RPO regulations protect wetlands. In addition, the California Natural Diversity Data Base of the CDFG has designated a number of communities as rare; these communities are given the highest inventory priority. Sensitive habitat types within the project site are discussed below.

Coastal sage scrub is considered a sensitive habitat by the County of San Diego, the CDFG and the USFWS and is a protected habitat under the MSCP. Coastal sage scrub was listed as the third most extensive vegetation community in the county over 25 years ago, however currently as much as 70 percent of this habitat has been destroyed or modified regionally. Additional evidence of the decline of this once common habitat is the growing number of declining plant and animal species dependent upon it, including the California gnatcatcher. Within the coastal sage scrub community onsite is the presence of patches of native grassland areas. Native grasslands are also considered sensitive by the County of San Diego due to their limited distribution, potential for supporting sensitive plant species, and habitat loss.

Wetland communities (southern willow scrub, vernal pool, and disturbed wetlands) are considered a sensitive and declining resource by several regulatory agencies including the County, ACOE, CDFG and the USFWS. Wetlands are specifically addressed by the CDFG Code sections 1600-1606 (Streambed Alteration Agreements), covered under the jurisdiction of the ACOE section 404 permit process, and regulated by the County of San Diego Resource Protection Ordinance (RPO). Clean Water Act permit provisions regulating dredge and the ACOE and the USEPA enforce fill operations, with technical input from the USFWS. The ACOE exerts jurisdiction over waters of the U.S. which include territorial seas, tidal waters, and non-tidal waters. The ACOE also has jurisdiction over wetlands and drainages that support wetland vegetation, as well as floodplains and unvegetated drainages that exhibit ponding or scouring, show obvious signs of channeling, or have discernible banks and high water marks. Vernal pools contain a number of high interest plant species and provide temporary breeding pools for amphibians and invertebrates. The great majority of these pools are in danger of being eliminated in the near future due to urbanization. It has been estimated that more than 97% of

# Significant Environmental Effects – 2.0

**Table 2.3-2  
OBSERVED SENSITIVE WILDLIFE SPECIES**

Common Name	Scientific Name	Status*	Location
San Diego Fairy shrimp	<i>Branchinecta sandiegensis</i>	USFWS: Endangered CDFG: None MSCP: MSCP-Covered Species, Narrow Endemic	The San Diego Fairy Shrimp was listed by the USFWS on February 3, 1997. This species was observed as cysts within all seven of the pools onsite as well as in the ponded area north of the agricultural pond. Mature San Diego Fairy Shrimp were observed in the agricultural pond with approximately 3-4 inches of standing water.
Black Shouldered Kite	<i>Elanus caeruleus majusculus</i>	USFWS: None CDFG: Fully Protected, Species of Special Concern (breeding) MSCP: Not Covered	One pair of kites were observed foraging onsite over the non-native grassland habitat in the northern portion of the site.
Northern Harrier	<i>Circus cyaneus hudsonius</i>	USFWS: Protected by the Migratory Bird Treaty Act CDFG: Species of Special Concern: (breeding) MSCP: Covered Species	A northern harrier was observed foraging on the site. Two harriers were observed overhead on the site.
Ferruginous Hawk	<i>Buteo regalis</i>	USFWS: Previous Category 2; Candidate species (wintering) CDFG: Species of Special Concern (wintering) MSCP: Covered Species	One individual of this species was observed in December soaring over the site.

\* An explanation of the status codes is provided in Appendix B of this SEIR.

## Significant Environmental Effects – 2.0

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the original vernal pool habitat within the San Diego region has been eliminated. The ACOE would regulate the riparian scrub, disturbed waters, and vernal pool habitats, while the CDFG would regulate the riparian scrub habitat associated with Johnson Canyon. The USFWS has jurisdiction over impacts to those sensitive species listed under the ESA.

Non-native grassland habitat onsite while not typically important as a plant association is considered sensitive by the County of San Diego Biological Mitigation Ordinance. The Biological Ordinance requires that impacts to non-native grassland be mitigated.

### 2.3.2 Thresholds of Significance

Significance criteria used in this analysis are based on the Biological Mitigation Ordinance (County 1998) and CEQA guidelines as well as guidelines provided in Nelson (1981).

In general, significant adverse impacts include:

- Impacts to federal or state-listed species or habitats;
- Impacts to sensitive species designated by the County of San Diego;
- Impacts to high quality or undisturbed biological communities, vegetation associations, and habitats that are restricted on a regional basis or serve as wildlife corridors or buffers;
- Impacts to habitat that serves as breeding, feeding, nesting, or migrating ground and is limited in availability or serves as core habitats to regional plant, wildlife, and fish populations; and
- Impacts to biological resources of scientific interest because they are at their physical or geographic limits or represent an unusual variation in a population or community.

Adverse but not significant impacts include:

- Impacts as a result of project implementation that adversely affect biological resources but would not significantly affect the overall survival of the resource on a long term basis; and
- Impacts to biological resources that are already disturbed or lack importance in the preservation of local or regional native biological diversity and productivity.

Cumulative impacts are those occurring throughout the project vicinity. Cumulative impacts could also occur from current land uses and proposed projects in the area.

# Significant Environmental Effects – 2.0

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## 2.3.3 Analysis of Project Effects and Determination as to Significance

### 2.3.3.1 Vegetation Community Impacts

#### 2.3.3.1.a (2.1 acres of coastal sage scrub), 2.3.3.1.b (4.2 acres of native grassland), and 2.3.3.1.c (186.5 acres of non-native grassland):

Implementation of the proposed *SUNROAD CENTRUM* project would result in the development of 96 commercial/industrial lots on the site. In addition, the proposed project would extend Otay Mesa Road off-site to the west to connect to the SR-905. Two open space preserve easements totaling ~~43.49~~ 51.7 acres would be placed on-site to the north and south of Lone Star Road. A total of 198.96 acres, or approximately 79 percent of the site would be graded or disturbed on the site. An additional 0.13 acre of off-site disturbance would occur for the extension of Otay Mesa Road to the SR-905.

Grading activities would directly impact existing biological resources found on the site by removing vegetative cover. On-site habitat impacts would include the loss of ~~16.1~~ 2.1 acres of coastal sage scrub, 4.2 acres of native grassland, ~~176.53~~ 186.5 acres of non-native grassland, 0.20 acre of southern willow scrub and 0.11 acre of disturbed wetland waters.

### Wetland Impacts

#### 2.3.3.1.d (0.31 acre of southern willow scrub and disturbed wetland habitat):

The proposed project site supports a 0.02-acre agricultural pond in the middle of the project site, south of Lone Star Road. In addition, there is a smaller 0.09-acre pond located just north of the agricultural pond. These two ponds have been created as part of the previous agricultural production activities on-site. The agricultural pond was developed for irrigation purposes and the smaller pond was created through the berming of the soil. Nevertheless, these two ponds support natural rainfall and are considered jurisdictional wetland waters of the U.S. The proposed project would result in the loss of both ponds (totaling 0.11 acre). In addition, small patches (0.20 acre) of southern willow scrub (a wetland habitat) would be impacted with the loss of the agricultural pond. Accordingly, this impact to wetland habitat (totaling 0.31 acre) would be considered significant and would require mitigation.

### 2.3.3.2 (Potential Indirect Impacts):

There will not be any direct impacts to the vernal pools or their watershed(s). There may be an indirect impact due to habitat fragmentation to one pool that would be isolated south of Lone Star Road.

### 2.3.3.3 (Off-site impacts)

In addition to these direct on-site impacts, habitat also would be impacted off-site along the proposed alignment of Otay Mesa Road. In this off-site area, habitat impacts would include 0.13-acre of non-native grassland. The impacts are summarized in Table 2.3-3, *Summary of Impacts*, and the areas where impacts to biology would occur are shown in Figure 2.3-1. Direct impacts to these habitats would be considered significant and would require mitigation.



# Significant Environmental Effects – 2.0

**Table 2.3-3  
SUMMARY OF IMPACTS**

Habitat	Total Number of Acres On-Site	Number of Acres Impacted On-Site	Percentage of Habitat Impacted On-Site	Number of Acres Impacted Off-Site Due to Otay Mesa Road Extension	Number of Acres Preserved On-Site in Open Space Preserve Easements
Coastal Sage Scrub	<del>27.5</del> <u>5.4</u>	<del>16.1</del> <u>2.1</u>	<del>57</del> <u>39%</u>	—	<del>11.4</del> <u>3.3</u>
Vernal Pools Numbers 1-7	0.21	—	0%	—	0.21
Southern Willow Scrub	<del>0.55</del> <u>6</u>	0.20	<del>36</del> <u>3%</u>	—	<del>0.35</del> <u>4</u>
Disturbed Wetlands/Waters	0.11	0.11	100%	—	—
<u>Native Grassland</u>	<u>7.3</u>	<u>4.2</u>	<u>57%</u>	—	<u>3.1</u>
Non-Native Grassland	<del>216.24</del> <u>231.2</u>	<del>176.66</del> <u>186.5</u> (includes 0.13 acre off-site)	81%	0.13	<del>31.58</del> <u>44.7</u> (includes 8 acres in Potential Future Development Area)
Disturbed Land (Existing Roads/Bare Dirt)	<del>6.45</del> <u>5.9</u>	5.89	N/A	—	—
<b>TOTAL</b>	<b>250.5</b>	<b>198.9</b>	<b>79%</b>	<b>0.13</b>	<b>51.54</b> <u>7</u>

# Significant Environmental Effects - 2.0

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## Sensitive Plant Species Impacts

### 2.3.3.4.a and 2.3.3.4.b:

**Variegated dudleya:** This species is considered a narrow endemic species within the County under the MSCP. ~~Over 300~~ About 360 individuals are presumed to exist on-site, the majority (80% or approximately ~~240~~ 280) of which would not be impacted by the project because they would be protected in the designated open space preserve easement, north of Lone Star Road. However, those plants (approximately 20% or ~~60~~ 80) that occur south of Lone Star Road would be impacted by grading activities for the commercial/industrial complex. This impact would be considered significant and would require mitigation.

### 2.3.3.5:

**San Diego button-celery:** This species occurs within the vernal complex, north and south of Lone Star Road. Consequently, the entire population would be preserved within the proposed open space preserve easement. However, indirect impacts from grading activities along Lone Star Road, human activities in the area, and long-term genetic consequences of habitat fragmentation could adversely impact this federally and state-listed endangered species. Based on the sensitivity and endangered status of this species, indirect impacts to this species are considered significant.

**Prostrate navarretia:** During the earlier surveys, approximately 12 individuals of this species were identified in the vernal pool complex, north of Lone Star Road. Accordingly, this species would be protected in the proposed open space preserve easement. However, indirect impacts, such as grading activities north of Lone Star Road and human activities in the area could adversely impact this species. Mitigation measures for construction activities are being proposed in this SEIR to reduce the potential impacts to all species located in the proposed open space preserve area. Given that the known population is within the proposed open space preserve on-site, no significant impacts to this species is expected to occur from this project.

### 2.3.3.6:

**San Diego barrel cactus:** This species occurs throughout the Specific Plan Area. Approximately 50% (or about ~~50~~ 47) of the individuals found on-site during the August 31, 2000 survey would be impacted by the proposed project. Although the loss of these individuals does not constitute a significant impact on a project-specific basis, it does represent a cumulative significant impact and would require mitigation.

### 2.3.3.7 Sensitive Wildlife Species Impacts

Four sensitive animal species were identified on-site. Those four include the black-shouldered kite, northern harrier, ferruginous hawk, and San Diego fairy shrimp. In addition, the Riverside fairy shrimp is presumed present on-site.

## Significant Environmental Effects - 2.0

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### 2.3.3.7.a:

**San Diego fairy shrimp:** This species is federally listed as an endangered species and is considered a narrow endemic under the MSCP. Mature fairy shrimp were identified in the agricultural pond (disturbed wetland habitat) during the recent wet season surveys of the site and cysts of the species were identified in the small pond and vernal pools during the recent dry season surveys. All of the vernal pools on-site would be preserved, therefore, no impacts would occur to the fairy shrimp populations in those pools. However, both the agricultural pond and small pond (disturbed wetland habitats) would be impacted by the project; thus, the fairy shrimp population in those ponds would be significantly impacted and would require mitigation.

**Riverside fairy shrimp:** This species is federally listed as an endangered species. Adequate surveys in compliance with USFWS protocol could not be completed during recent visits to the site because the agricultural pond did not fill with water during the recent survey. Although, the species was not detected on-site during the site visits, it is assumed that the agricultural pond on-site provides adequate potential habitat for this species. Therefore, impacts to this pond would be considered significant because of the potential presence of this species. This assumption was made to allow the permitting process for the proposed project to proceed forward.

### 2.3.3.7.b:

**Black-shouldered kite:** This species is listed as fully protected by the state. Impacts to the black-shouldered kite include the loss of foraging habitat and potential loss of breeding habitat. Impacts to foraging habitat would not be considered significant because of the low sensitivity of this species. Juveniles were observed with adult kites in the area during the earlier surveys; suggesting that there is a strong possibility that the species nests within the Specific Plan area. Accordingly, impacts to potential nest sites would be considered significant.

**Northern harrier:** This species is protected by the federal Migratory Bird Treaty Act and listed by the state as a species of special concern. The project site provides foraging habitat and potential nesting habitat for the harrier. The direct loss of foraging habitat, coupled with the cumulative loss of habitat in the region, would be the primary impact to the species as a result of the proposed project. Impacts to both the foraging and potential breeding opportunities on-site would be considered significant.

**Ferruginous hawk:** This species is considered regionally sensitive by the U.S. Fish and Wildlife Service and a species of special concern by the California Department of Fish and Game. Reduction of foraging habitat would adversely but not significantly impact this species. Because this species is not a breeding resident in area and substantial foraging habitat still exists within Johnson Canyon to the north, impacts would not be considered significant.

## Significant Environmental Effects – 2.0

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### 2.3.3.8 Indirect Impacts to Biological Resources

Potentially significant indirect impacts to biological resources may result from the proposed development, including: human activities (such as, noise and lighting from the development and collection of animal species); construction activities (such as, grading for Lone Star Road); the introduction of non-native and invasive plant/animal species; increased runoff, erosion, and sedimentation; contamination from toxic material spills; and habitat fragmentation of the vernal pool complex by the isolation of one vernal pool south of Lone Star Road. ~~The RCP (included in Appendix B of this SEIR) includes mitigation measures to minimize impacts.~~ The EOMSP also discussed the indirect impacts to biological resources. Mitigation and protection measures that were listed in the EOMSP EIR have been included in ~~the RCP~~ this SEIR for the *SUNROAD CENTRUM* Project.

#### 2.3.3.8.a:

**Human Activities:** An increase in human use of the area as the result of the proposed development may have an adverse effect on vegetation through unauthorized clearing of vegetation, illegal refuse disposal, off-road vehicle activity, and noise and lighting from the developed areas. All of these impacts would significantly degrade habitat in the proposed open space easements. In addition, excessive noise from the proposed development would potentially affect animal communities, prey detection, and predator awareness in a variety of species. Light reaching open space areas would likely exclude a number of nocturnal species from the lighted zone, effectively causing a loss of usable habitat for those species. These impacts could have a potentially significant effect on animal species.

#### 2.3.3.8.b:

**Construction Activities:** Potentially significant impacts to water quality could result from the proposed construction activities. Siltation could occur during or after grading, if proper erosion control measures are not followed, resulting in a temporary loss of water clarity and the potential alteration of streambed topography that could affect the viability of aquatic species and remove water sources used by terrestrial species.

#### 2.3.3.8.c:

**Introduced Species:** Human development usually brings a number of non-native and invasive plant species and domestic and urban fringe species into an area. Non-native and invasive plant species can essentially invade a native plant population, resulting in detrimental impacts to the native species. Rodents, such as the house mouse and black rat, occur as a consequence of human development and compete with the native rodent population for food. In addition, as they become pests to the residents, poisoning and trapping programs are typically implemented to eradicate them. These programs also can lead to the inadvertent poisoning of the native rodents, and as an additional consequence, other wildlife may ingest the poisoned rodents, consequently, becoming poisoned themselves. Introduced predators include both domestic pets and native or established species (such as such as the common raven, northern mockingbird, striped skunk, and opossum). These species become overly effective predators and overpopulated when humans supplement their diets. The affects of introduced species would not be expected to be significant,

## Significant Environmental Effects – 2.0

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because the majority of the site would be developed with industrial uses, and therefore, would not be expected to lead to the introduction of pet species to the area.

### 2.3.3.8.d:

**Increased Runoff, Erosion, and Sedimentation:** The proposed construction of Lone Star Road would result in the removal of vegetation on hillsides that could result in a temporary increase in runoff into the vernal pool complex to the north of Lone Star Road and the one vernal pool to the south of Lone Star Road. Increased runoff can, in turn, result in erosion and sedimentation that could adversely affect wetland vegetation or other associated drainages.

The primary concerns to biological resources from erosion and sedimentation are 1) increased erosion due to clearing of existing vegetation and the resultant bare soil surface and 2) degradation of on- or off-site (i.e. downstream) riparian/wetland habitat by excessive sedimentation, having potentially significant impacts.

### 2.3.3.8.e:

**Toxic Materials:** Contamination of drainages from fuel spills or other toxic substances could potentially result in significant impacts, and could occur during both construction and operational phases of the project. Toxic spills can result in significant impacts from degradation of habitat and water quality.

### 2.3.3.8.f:

**Habitat Fragmentation:** The vernal pool to the south of Lone Star Road would be preserved within a proposed 0.25-acre open space easement. The vernal pool complex to the north of Lone Star Road would be preserved in a separate open space easement. Potentially significant impacts associated with habitat fragmentation could occur by separating the two vernal pool areas from each other with the placement of Lone Star Road between the two. This potential impact was considered in the EOMSPA EIR, which determined that there are no feasible alternatives to avoid fragmentation and the impacts would be mitigated with preservation of the remaining vernal pool habitat. No other forms of habitat fragmentation are expected to occur elsewhere on the site, because Johnson Canyon and its slopes will be preserved in order to maintain the necessary wildlife linkages and corridors between the on- and off-site preserved habitats. Preservation of Johnson Canyon and its slopes as a wildlife corridor is consistent with the East Otay Mesa Specific Plan.

## 2.3.4 Mitigation Measures

### Mitigation for Newly Identified Biological Resources Impacts

All significant impacts to biological resources will require mitigation. The following sections outline the proposed mitigation measures that would reduce the impacts to a level below significant. The mitigation measures will be incorporated as project design features or conditions for project approval. In addition, a Resource Conservation Plan (RCP) has been prepared for the proposed project and is included as Appendix B of this SEIR. All mitigation measures included

## Significant Environmental Effects - 2.0

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in the RCP shall be approved by the CDFG, USFWS, and the County, prior to issuance of grading permits (Mitigation Measure 2.3.4).

### Vegetation

The proposed project would require mitigation for the impacts to ~~four~~ five vegetation and/or habitat types: coastal sage scrub, native grassland, non-native grassland, southern willow scrub, and disturbed wetlands. The success criteria and monitoring program for each mitigation effort are provided in the RCP (see Appendix B of this SEIR).

#### 2.3.4.1.a:

~~**Coastal Sage Scrub / Non-Native Grassland Mix:** Impacts to ~~16.1~~ 2.1 acres of coastal sage scrub (with a ~~native grassland component~~) would be considered significant. Coastal sage scrub is a Tier II habitat within the Biological Maintenance Ordinance (BMO), and therefore must be mitigated at a ratio of 1.5:1. However, because of the integrated nature of the native grasses on-site (a Tier III habitat requiring a 2:1 mitigation ratio), the applicant has agreed to a mitigation ratio of 1.75:1 with the County (January 14, 2000). Thus, ~~28.17~~ 3.1 acres of sage scrub must be either preserved on-site or acquired and placed into the preserve system. The impacts would be ~~partially~~ fully mitigated on-site by preserving ~~11.4~~ 3.3 acres of coastal sage scrub within the proposed open space preserve easement to the North of Lone Star Road. This leaves a balance of 16.7 acres of Tier I habitat needing mitigation. This acreage could be purchased and placed within the preserve system or purchased through a pre-approved mitigation bank within the MSCP subregion. The combination of preservation coastal sage scrub on-site and purchase of off-site mitigation mitigates this impact to below a level of significant.~~

#### 2.3.4.1.b:

~~**Native Grassland:** Impacts to 4.2 acres of native grassland habitat would be considered significant. Native grassland habitat is a Tier I habitat in the BMO and impacts to this habitat would require mitigation at a ration of 2:1. Accordingly, 8.4 acres of Tier I habitat would require mitigation. The impacts would be partially mitigated by preserving 3.1 acres of Tier I habitat within the proposed open space preserve easement to the north of Lone Star Road, thereby leaving a deficit of 5.4 acres of habitat needing off-site mitigation. This habitat would be purchased off-site or within a pre-approved mitigation bank within the MSCP subregion. The combination of preservation on-site and the purchase of credits mitigates this impact to below a level of significant.~~

#### 2.3.4.1.c and 2.3.4.3:

~~**Non-Native Grassland:** Impacts to ~~176.8~~ 186.5 acres (~~176.7~~ 186.37 on-site and 0.13 off-site) would be considered significant. Non-native grassland habitat is a Tier III habitat in the BMO and impacts to this habitat would require mitigation at a ratio of 0.5:1. Accordingly, ~~88.4~~ 93.3 acres of this habitat would require mitigation. The impacts would be partially mitigated by preserving ~~31.6~~ 44.7 acres of this habitat within the proposed open space preserve easement to the north of Lone Star Road, thereby leaving a deficit of ~~56.8~~ 48.6 acres of habitat needing off-site mitigation. This habitat would be purchased off-site or within a pre-approved mitigation bank~~

## Significant Environmental Effects – 2.0

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within the MSCP subregion. The combination of preservation on-site and the purchase of credits mitigates this impact to below a level of significant.

### 2.3.4.1.d:

**Wetlands and Other “Waters of the U.S.”:** Project implementation would result in the loss of wetlands and other “Waters of the U.S.,” including the loss of the agricultural pond (0.02 acre), the small pond (0.09 acre) to the north of the agricultural pond, and 0.20 acre of southern willow scrub. Thus, the loss of 0.31 acre of jurisdictional wetland habitat would be considered significant and would require mitigation at a ratio of 2:1 (total includes creation of at least 1:1). The project is proposing to create 0.22 acre of wetland habitat within the vernal pool complex located within the proposed open space easement on-site. An additional 0.4 acre of wetland habitat would either be created on-site adjacent to the existing southern willow scrub habitat near Johnson Canyon, or at a off-site location that would be approved by the County and ACOE. The objective of the on-site 0.22-acre wetland mitigation site would be to create basins that will collect water adequately to provide habitat for the endangered San Diego and Riverside fairy shrimp and to ensure no net loss of wetland habitat value. The on- or off-site 0.40-acre wetland mitigation site would be to create southern willow scrub habitat adjacent to existing wetland habitat. The precise proportions and ecological arrangement of plantings shall be specified in the site-specific RCP (Appendix B of this SEIR). In addition, impacts to the wetlands will require a permit from the Army Corps of Engineers under Section 404 of the Clean Water Act, and a 401 water quality certification from the Regional Water Quality Control Board. Those permits would require a qualified biologist to prepare a detailed site-specific mitigation and monitoring plan for the proposed mitigation plan. The proposed wetland mitigation plan would reduce the impacts to below significant.

### 2.3.4.2:

Although the proposed project would not impact the seven on-site vernal pools, a vernal pool management plan will be required in accordance with the SPA. Additional mitigation measures that have been incorporated into the RCP include, protection of the open space through the use of: perimeter fencing, maintenance of the trail easement, and signs along open space perimeter.

### Sensitive Plants:

The East Otay Mesa Specific Plan requires that avoidance of impacts be addressed as the first priority for mitigation of sensitive plant species. If avoidance is not feasible entirely then the Specific Plan allows for plant salvage as mitigation. The primary goal of sensitive plant salvage efforts is to identify ecologically appropriate areas that will support the salvaged plant material. Implementation and maintenance efforts will require salvaging and possible storage of seeds, bulbs, or other plant material, habitat characterization studies, site selection, design and implementation of a detailed plan (including but not limited to an experimental component, and horticultural and botanical monitoring), and a long-term monitoring program. Transplantation would require approval of the CDFG and the USFWS as well as the County. The proposed project would require mitigation for the direct and indirect impacts to four sensitive plant species: variegated dudleya, San Diego button-celery, and San Diego barrel cactus. A more detailed

## Significant Environmental Effects – 2.0

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description of the proposed transplanting, management, and monitoring programs being proposed as mitigation for the following applicable species is provided in the RCP (see Appendix B of this SEIR).

### 2.3.4.4.a:

**Variegated Dudleya:** Preservation of the majority of this population will occur within the designated open space, north of Lone Star Road, thereby significantly reducing the overall impacts to this population. However the impacts to the plants located south of Lone Star road would be impacted by development. Transplantation and re-introduction within the on-site open space preserve area will be required for the impacts to the plants located south of Lone Star Road. Based on the species' biology, this species may lend itself to transplantation efforts. The re-introduction program for this species shall consist of salvaging; site selection, based on habitat characterization and other factors (e.g., hydrology, topography, soils, site protection); development of a detailed plan (including an experimental component and horticultural and botanical monitoring), and a long-term (5-year) monitoring program. The receiver sites within the open space preserve area shall be similar to the impacted site with respect to topography, habitat, hydrology, and soils, and shall be in proximity to the impacted site. This transplanting program is discussed in more detail within the required RCP.

### 2.3.4.4.b:

If salvage/transplantation is not successful (80% success criteria or 64 individuals), off-site mitigation through the purchase of habitat to the extent determined unsuccessful and as acceptable to the County and the Resource Agencies shall be required. It is anticipated that Hollenbeck Canyon would satisfy this off-site purchase obligation, should it arise. The proposed mitigation would reduce the impacts to a level below significant.

### 2.3.4.5:

**San Diego Button-Celery:** This species occurs in the vernal pool complex. All populations of this species on-site would be preserved within the proposed open space easement and protected under the RCP (Appendix B of this SEIR). Any potential indirect impacts to vernal pools (and the San Diego button-celery) due to construction activities and the alignment of Lone Star Road would be fully mitigated through long term management and protection of the complex, as discussed in the RCP and through the implementation of the various mitigation measures listed below in the discussion titled *Indirect Impacts to Biological Resources*. Accordingly, the button-celery would be protected and the potential impacts would be reduced to a level below significant.

**Prostrate Navarretia:** This species is expected to occur in the vernal pool complex. All populations of this species on-site would be preserved within the proposed open space easement and protected under the RCP (Appendix B of this SEIR). Any potential indirect impacts to vernal pools (and the prostrate navarretia) due to construction activities and the alignment of Lone Star Road would be fully mitigated through long term management and protection of the complex, as discussed in the RCP and through the implementation of the various mitigation measures listed below in the discussion titled *Indirect Impacts to Biological Resources*. Accordingly, the



## Significant Environmental Effects - 2.0

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prostrate navarretia would be protected and the potential impacts would be reduced to a level below significant.

### 2.3.4.6:

**San Diego Barrel Cactus:** This species is found scattered throughout the coastal sage scrub habitat on-site. Impacts to this species is not considered significant on a project-specific basis, however, impacts would be cumulatively significant when impacts to this species from other projects are also taken into consideration. Preservation of a large portion of this species on-site would occur through the preservation of the sage scrub habitat located in the proposed open space preservation easement. Accordingly, adoption of the proposed mitigation measure in the RCP would reduce the cumulative impacts to below a level of significance.

### Sensitive Animals:

The proposed project would result in significant impacts to the black-shouldered kite, northern harrier, ferruginous hawk, and San Diego and Riverside fairy shrimp. A more detailed description of the monitoring programs being proposed as mitigation for each of the following species are provided in the RCP (see Appendix B of this SEIR).

### 2.3.4.7.a:

**San Diego and Riverside Fairy Shrimp:** The San Diego fairy shrimp occur in the vernal pools and the ponds on-site. Although, the Riverside Fair Shrimp was not identified in either the vernal pools or the ponds, it is assumed that the species occurs on-site. Vernal pool preservation would partially mitigate impacts to both species. However, impacts associated with the loss of the ponds would require additional mitigation. Accordingly, the project is proposing to create wetland habitat to mitigate wetland impacts that also would provide habitat for these two species in the proposed open space easement, as specified in the RCP. Creation of wetlands suitable for both species will fully mitigate impacts to these species to below a level of significance. The restoration effort will incorporate measures to salvage these species from the on-site ponds and relocate them into the created pools within the proposed open space easement. The pools will be monitored for fairy shrimp at intervals specified in the RCP for a five-year period. Quarterly reports will be prepared by the applicant's consultant for the first year and annual reports thereafter. If the success criteria listed in the RCP are not met at the end of a given year, remedial action will be taken, pursuant to the direction and approval from the Army Corps of Engineers and U.S. Fish and Wildlife Service.

### 2.3.4.7.b:

**Black-Shouldered Kite:** Mitigation requirements for the loss of foraging habitat and potential breeding habitat for this species would be met by requiring a qualified biologist to monitor the construction area for suitable nesting habitat (e.g., trees) in the vicinity of construction during the breeding season. The RCP would require that a 'construction-free zone' be created around any identified nesting sites until fledging has occurred. The biologist would coordinate with County staff during the monitoring efforts to determine the size of any required construction zone. This would mitigate the impacts to a level below significant.

# Significant Environmental Effects – 2.0

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**Northern Harrier:** Mitigation requirements for this species would be partially met by the preservation of foraging habitat consisting of 51.7 acres within the proposed open space easement. The enhancement of the habitat within the open space will further reduce impacts to this species. In addition, initial clearing of vegetation shall occur outside the nesting season (mid-April through June July). If that is not possible, a raptor nesting survey shall be conducted. If an active nest is found, grading will cease in the immediate vicinity, and the monitoring biologist and County staff will determine and agree to an acceptable buffer between the nest location and grading activities. Table 3.5 in the 1996 MSCP Plan states that an acceptable buffer would be 900 feet. Once the nest becomes non-active, grading restrictions shall not longer apply. Mitigation in conformance with the BMO for both on- and off-site habitat preservation (as proposed above in the discussion of sage scrub and grassland habitat mitigation) will fully mitigate for the loss of foraging habitat for this species regionally.

## 2.3.4.8: Indirect Impacts to Biological Resources

Indirect impacts to biological resources may result from an increase in human activity in the area. Those impacts may result from noise and lighting from the development, the introduction of non-native and invasive plant species, increased runoff, erosion, sedimentation, contamination from toxic material spills, and habitat fragmentation. Mitigation measures, as described below, would reduce the impacts to below significant. A more detailed description of the following mitigation measures is provided in the RCP (see Appendix B of this SEIR).

### 2.3.4.8.a:

**Human Activities:** The adverse effects on vegetation due to the increase in human activity in the area can be minimized by: 1) creating buffer zones adjacent to the open space easements to minimize the effects from noise and lighting; 2) limiting pedestrian and equestrian trails to existing roads or non-sensitive habitats; and 3) discouraging entry into native habitats such as the riparian and vernal pool habitats by installing fencing and barrier plantings and/or signage. In addition, the Resource Conservation Plan will require fencing around the entire open space preserve easement to discourage trespassing and illegal dumping.

### 2.3.4.8.b:

**Construction Activities:** Indirect impacts to habitats may result from construction activities, such as construction of Lone Star Road. To avoid the potential impacts, the limits of the vernal pool habitats shall be surveyed and staked prior to construction. These limits shall be clearly shown on all construction drawings as 'no impact zones.' This area will have temporary fencing prior to construction to prevent vehicular or pedestrian access, equipment storage, storage of spoils materials, and refuse disposal.

### 2.3.4.8.c:

**Introduced Species:** The use of non-native, invasive plant species will be prohibited in the proposed landscaping palettes (including container stock and hydroseed material) for the streetscapes and commercial/industrial. A qualified biologist or native plant horticulturist shall review and sign all landscaping plans to determine the appropriate species to be used in

## Significant Environmental Effects – 2.0

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landscaping, prior to project approval. These measures would reduce the potential impacts to below significant.

### 2.3.4.8.d:

**Increased Runoff, Erosion, and Sedimentation:** The proposed construction of Lone Star Road would result in the removal of vegetation on hillsides that could result in a temporary increase in runoff into the on-site vernal pools. Increased runoff can, in turn, result in erosion and sedimentation that could adversely affect wetland vegetation or other drainages. Erosion and sedimentation impacts can also be mitigated by employing standard erosion control procedures, such as, sandbagging, diversion ditches, and streambank stabilization. Prior to project approval, a construction erosion control plan will be reviewed and approved by the County. In addition, the project will be required to obtain a National Pollutant Discharge Elimination System (NPDES) Permit for construction activities from the Regional Water Quality Control Board, of which will require an approved Storm Water Pollution Prevention plan. That plan will require the permit applicant to implement measures to prevent contamination of the surrounding drainages during construction. These measures would mitigate the potential for significant impacts to a level below significant.

### 2.3.4.8.e:

**Toxic Materials:** Spills of toxic materials could occur during both construction and operational phases of the project. These spills could contaminate drainages and create a significant impact to habitat and water quality. In order to prevent these impacts, a 'no fueling' zone shall be designated within 25 feet of all drainages during the construction period. In addition, all equipment used near drainages during construction shall be routinely maintained and inspected for leaks. Major leaks shall be repaired immediately. Drip pans and tarps shall be placed under minor leaks. Used drip pans and tarps shall be properly disposed of at the end of each work day. Emergency provisions (e.g. straw bales) shall be placed at all drainage crossings, prior to the onset of construction to deal with unintentional spills. All of these measures will be included in approved Storm Water Pollution Prevention Plan (SWPPP) as a part of the RWQCB-required NPDES permit for construction activities.

In addition, all commercial/industrial uses that plan to store materials within the proposed commercial/industrial complex would be required to obtain a NPDES permit for operational activities from RWQCB. That permit would also require a SWPPP for each facility to prevent contamination of nearby drainages. These measures would mitigate the potential for significant impacts to a level below significant.

### 2.3.4.8.f:

**Habitat Fragmentation:** Lone Star Road could potentially result in habitat fragmentation between the vernal pool complex to the north of Lone Star Road and the one vernal pool to the south of Lone Star Road. The southern vernal pool will be managed as a part of the larger vernal pool complex to the north. Integrated management of the southern pool with the rest of the vernal pool complex will ensure the long term viability of this pool and associated plant populations. The required Resource Conservation Plan includes a management program for the vernal pools

## Significant Environmental Effects – 2.0

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and would mitigate the potential for impacts to below significant.

### 2.3.4.9 Previously Identified Mitigation Measures

In addition to the mitigation measures described above, the project also would be required to implement the applicable mitigation measures listed in the certified East Otay Mesa Specific Plan EIR. The following measures would reduce potential direct and indirect impacts to biological resources to a level below significant and have been incorporated into the RCP for the project.

#### 2.3.4.9.a:

- *Provision should be made to inform the construction contractor(s) (prior to the construction process) about the biological constraints of this project. The contractor(s) will be responsible for impacts to biological sensitivities beyond those identified in this report and that occur as a direct result of construction activities. All sensitive habitat areas or occurrences of sensitive species to be avoided shall be clearly marked on project maps provided to the contractor. These areas shall be designated as "no construction" or "limited construction" zones. These areas will be flagged by the project biologist prior to the onset of construction activities. In some cases, resources may need to be fenced or otherwise protected from direct or indirect impacts.*

#### 2.3.4.9.b:

- *A contractor education meeting shall be conducted to ensure that contractors and all construction personnel are fully informed of the biological sensitivities associated with this project. This meeting should focus on 1) the purpose for resource protection, 2) contractor identification of sensitive resource areas in the field (e.g., areas delineated on maps and by flags or fencing), 3) sensitive construction practices (see nos. 4-9, ... on Pages 4.3-106 and 4.3-107 of the Specific Plan EIR), and protocol to resolve conflicts that may arise during the construction process. This meeting shall be conducted by a qualified biologist, and shall be a requirement for all construction personnel.*

#### 2.3.4.9.c:

- *Heavy equipment and construction activities shall be restricted to the development area. Prohibited activities within drainages or other wetland areas (including vernal pools) include staging areas, equipment access, and disposal or temporary placement of excess fill.*

#### 2.3.4.9.d:

- *Staging areas are prohibited within sensitive habitat areas or any habitat included in open space. Staging areas shall be delineated on the grading plans and reviewed by a qualified biologist. Likewise, vehicle access shall be prohibited in all open space areas.*

#### 2.3.4.9.e:

- *Fueling of equipment shall not occur adjacent to drainages. . . . [F]ueling zones should be designated on construction maps and shall be situated a minimum distance of 7.6 m (25 ft) from all drainages the open space limits or near storm drains that may drain into Johnson Canyon.*

# Significant Environmental Effects - 2.0

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## 2.3.4.9.f:

- *Construction in or adjacent to sensitive areas should be appropriately scheduled to minimize potential impacts to biological resources. All work in or near wetlands or other "waters of the U.S." shall take place during periods of minimum flow (i.e., summer through the first significant rain of fall) to avoid excessive sedimentation and erosion.*

## 2.3.4.9.g:

- *The open space limits must be staked and flagged prior to clearing or grubbing. The limits of the open space must be fenced with a chain link fence at least five feet tall prior to clearing or grubbing. The fence location must be approved by County staff or monitoring biologist prior to receipt of grading permit and will be a permanent protection measure.*

## 2.3.4.9.h:

- *A Resource Conservation Plan detailing wetland enhancement, preservation, and maintenance, coastal sage scrub habitat preservation, sensitive species salvaging, and transplanting as well as success standards and report requirements must be completed prior to the initiation of construction [See Appendix B of this EIR].*

## **2.3.5 Conclusions**

Significant impacts are expected to occur to 0.31 acre (including 0.20 acre of southern willow scrub) of jurisdictional wetlands and waters of the U.S. In addition, the project would significantly impact ~~16.1~~ 2.1 acres of coastal sage scrub ~~/non-native grassland mix~~, 4.2 acres of native grassland, and ~~176.66~~ 186.5 acres of non-native grassland habitat. The project would also create direct and indirect significant impacts to animal species (black-shouldered kite, northern harrier, and San Diego and Riverside fairy shrimp) and plant species (variegated dudleya, San Diego button-celery, San Diego barrel cactus, prostrate navarretia). Proposed mitigation for these impacts would include a combination of some or all of the following: on-site preservation of the vernal pools, habitat restoration of fairy shrimp habitat and disturbed waters and coastal sage scrub habitat on-site, off-site purchase of additional lands needed to off-set impacts in accordance with the BMO, and sensitive plant and fairy shrimp salvage and translocation program. The details of the mitigation program are provided in the RCP for the proposed project. Prior to project commencement, the RCP would require approval from the County of San Diego, California Department of Fish and Game, and the U.S. Fish and Wildlife Service, and a 404 permit from the Army Corps of Engineers would be required. The proposed mitigation would reduce the impacts to a level below significant.

## **2.4 Cultural Resources**

In 1993, a cultural resources evaluation of the 3,300-acre East Otay Mesa Specif Plan Area was conducted by OGDEN ENVIRONMENTAL AND ENERGY SERVICE CO., INC. The results of that evaluation were used by the County of San Diego to analyze the potential impacts to cultural resources as a result of the various projects (including the *SUNROAD CENTRUM* project) being proposed in the East Otay Mesa

# Significant Environmental Effects – 2.0

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Specific Plan EIR. Since certification of the EIR and adoption of the Specific Plan, the proposed *SUNROAD CENTRUM* project was modified slightly to include the construction of an extension of Otay Mesa Road, that would connect to SR-905. Accordingly, the previous study was reviewed to determine if an additional analysis would be required for the proposed project. The results of that review are included as Appendix D of this SEIR and are summarized below. In addition to that evaluation, the County conducted a records search to determine if the alignment of the proposed extension had been surveyed previously by others. The County determined that the proposed alignment was previously surveyed for cultural resources in 1996 by GALLEGOS & ASSOCIATES for the City of San Diego's Otay Mesa Road Widening Project. The 1996 cultural resources survey evaluated two phases of the proposed Otay Mesa Road Widening Project (Kyle et al. 1995), one of which included the widening of Otay Mesa Road to a six-lane road from La Media Road to Harvest Road. The study area for that phase included the alignment area for the Otay Mesa Road extension being proposed under the *SUNROAD CENTRUM* Project.

The 1996 study (Kyle et al. 1995) included a literature review, record search, field survey, and tests to determine significance for portions of nine sites and one historic location that would be impacted by the proposed Otay Mesa Road Widening project. That study was completed in compliance with the City of San Diego and California Environmental Quality Act criteria. The results of that study, together with the results of the previous EIR studies, are also summarized below. A copy of the 1996 cultural resources report can be obtained from the County of San Diego.

## 2.4.1 Existing Conditions

The *SUNROAD CENTRUM* project site encompasses 250.5 acres of undeveloped land and is located east of Interstate 805 (I-805) and north of SR-905 and Otay Mesa Road in the East Otay Mesa community of the County of San Diego. The project site is currently accessed by Otay Mesa Road to the south and Harvest Road to the west. The property is nearly flat-lying to steeply sloping with elevation ranging from approximately 630 Mean Sea Level (MSL) in the central portion of the site to approximately 430 feet MSL at the bottom of Johnson Canyon, near the sites' northeastern corner. Mound and swale ("mima mound") topography characterizes the relatively horizontal mesa top located in the north-central portion of the property.

In the past, the project site has been disturbed by agricultural and grazing activities. These activities created an agricultural pond located on-site in the north-central portion, which has since been abandoned. In addition, various trash piles occur on the site that contain wood debris, irrigation, and plastic sheeting. Existing improvements consist of Harvest Road at the west end, a dirt road along the eastern property line, several dirt roads trending east-west at the center over the existing knoll, and several buried and surface irrigation lines. Natural drainage is mainly a divergent network of shallow swales and ravines that ultimately discharge into Johnson Canyon to the northeast or into controlled facilities along Otay Mesa Road to the south. Vegetation is dense and primarily consists of non-native grasslands with brush on the steeper slopes.

As stated above, the project site was previously evaluated in 1993 for the East Otay Mesa Specific Plan EIR. The results from the cultural resources survey indicated that two prehistoric sites (CA-SDI-5352 and CA-SDI-12730) exist on the *SUNROAD CENTRUM* project site. Site CA-

## Significant Environmental Effects – 2.0

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SDI-5352 is a large site that extends over several parcels of land, including the proposed *SUNROAD CENTRUM* project site. Those portions of the prehistoric site that lie within the *SUNROAD CENTRUM* project site boundaries were tested by Gallegos & Associates in 1992 to determine: site size, depth, content, integrity, and potential to address important research questions. Site CA-SDI-12730 is a smaller site located in the northern portion of the property along a terrace above Johnson Canyon. Testing of this prehistoric site was also conducted in 1992.

### Site CA-5352/12337/SDM-W-1804

Fieldwork at CA-SDI-5352 included: a surface collection; excavation of 197 shovel test pits (STPs); and the excavation of 17 1x1 m units. Test results identified site CA-SDI-5352 as an Early Period/Archaic site, of which major portions have been disturbed. This site appears to have been primarily used as a quarry/lithic reduction area with some habitation occupation noted at Locus A.

Locus A (knoll top/agricultural field) contained a mixed subsurface deposit containing flake tools, core tools, cores, hammerstones, manos and debitage. The Pleistocene terrace is characterized by the presence of mima mounds. Cultural material within this area is a surface deposit. These mounds were highly disturbed by rodents, and as such, no intact cultural deposits were located. The cultural deposit in the agricultural fields is shallow and has been disturbed through agricultural use, rodents, and expansive/contractive clay soils.

Site CA-SDI-5352 is also known by site number CA-SDI-12337, and additional testing done in connection with: 1) SR 125 (Byrd et al. 1994, Rosen 1994); and, 2) Otay Mesa Road Widening (Kyle et al. 1996), is consistent with the original evaluation of significance of SDI-5352.

### Site CA-SDI-12730/SDM-W-456

Site CA-SDI-12730, was found to extend to the southeast along the terrace above Johnson Canyon. Testing at CA-SDI-12730 included a collection of surface artifacts, and excavation of 12 STP and two 1x1 meter units. Artifacts recovered include: cores, core tools, debitage, bone and shell. This work identified site size, depth, content and an intact subsurface cultural deposit to a depth of 80 cm.

## 2.4.2 Thresholds of Significance

Determination of what is, and what is not a significant resource, is not a straightforward task. As suggested by Moratto and Kelly (1976), the significance of archaeological resources should be assessed in several terms including research value to the scientist, aesthetic/cultural value to the community at large, and Native American values. The importance of an archaeological resource must be demonstrated. According to Section 15064.5 of CEQA, the term historical resources shall include the following:

## Significant Environmental Effects – 2.0

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- 1) A resource listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources (Pub. Res. Code § 5024.1, Title 14 CCR, Section 4850 et seq.).
- 2) A resource included in a local register of historical resources, as defined in Section 5020.1 (k) of the Public Resources Code or identified as significant in an historical resource survey meeting the requirements Section 5024.1 (g) of the Public Resources Code, shall be presumed to be historically or culturally significant. Public agencies must treat any such resource as significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant.
- 3) Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be an historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be historically significant" if the resource meets the criteria for listing on the California Register of Historical Resources (Pub. Res. Code §5024.1, Title 14CCR, Section 4852) including the following:
  - (A) Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
  - (B) Is associated with the lives of persons important in our past;
  - (C) Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
  - (D) Has yielded, or may be likely to yield, information important in prehistory or history.
- 4) The fact that a resource is not listed in, or determined to be eligible for listing in the California Register of Historical Resources, not included in a local register of historical resources (pursuant to Section 5020.1 (k) of the Public Resources Code), or identified in an historical resources survey (meeting the criteria in Section 5024.1 (g) of the Public Resources Code) does not preclude a lead agency from determining that the resource may be an historical resource as defined in Public Resources Code sections 5020.1 (j) or 5024.1.



# Significant Environmental Effects - 2.0

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## 2.4.3 Analysis of Project Effects and Determination as to Significance

### 2.4.3.1 (a. through i.):

As summarized in a 1999 letter report prepared by Gallegos & Associates (Appendix D of this SEIR), the cultural resources evaluation prepared in 1993 for the East Otay Mesa Specific Plan EIR identified two prehistoric sites (Sites CA-SDI-5352 and CA-SDI-12730) on the project site. Testing results of Site CA-SDI-5352 produced numerous artifacts. However, given the shallow nature of the site and the agricultural disturbance, the site was identified as not significant as defined by CEQA Section 15064.5. Despite the determination of insignificance, the EIR recommended mitigation to be implemented for the direct impacts to this site (see Section 2.6.4 of this SEIR).

### 2.4.3.2. (a. and b.):

Site CA-SDI-12730 was initially recorded in 1972 by Mike Waters and updated in 1992 as part of the testing program for the Specific Plan EIR. Testing produced cores, core tools, a mano, scrapers, and debitage to a depth of 80 cm. Given the high number of artifacts, depth of deposit and the potential for the site to address important research questions, site CA-SDI-12370 was identified as significant under CEQA Section 15064.5. This prehistoric site lies within the proposed open space preserve easement on the project site. Accordingly, no impacts would occur to this prehistoric site.

According to the 1996 study (Kyle et. al.) conducted for the Otay Mesa Road Widening project, the off-site improvements to Otay Mesa Road would impact Site CA-SDI-5352/12337. The proposed *SUNROAD CENTRUM* project would impact approximately 3,110.4 square meters of this prehistoric site. Previous testing for Site CA-SDI-5352/12337 identified agricultural disturbance and lack of an intact subsurface deposits. The portion of CA-SDI-5352/12337 tested was identified as not significant.

## 2.4.4 Mitigation Measures

Although the 1993 EIR for the East Otay Specific Plan did not recommend site-specific mitigation for potential impacts to Site CA-SDI-5352, the 1992 EIR technical report (Gallegos and Kyle) and the 1999 letter report prepared by GALLEGOS & ASSOCIATES recommended mitigation measures for the proposed *SUNROAD CENTRUM* project. Those measures are provided below. The 1993 EIR did determine that potential impacts to Site CA-SDI-12730 would be avoided by placing it in a dedicated open space easement on-site. Accordingly, the following measures would reduce the potential for significant impacts to cultural resources to a level below significant.

### 2.4.4.1 Site CA-SDI-5352:

#### 2.4.4.1.a:

In case there are undiscovered buried significant resources, a mitigation grading monitoring plan for SDI-5352 shall be prepared and shall include:

## Significant Environmental Effects – 2.0

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### 2.4.4.1.b:

Written verification to the Planning Director that a County certified archaeologist/historian has been retained to implement the monitoring program. The requirement for archaeological monitoring shall be noted on the face of the final grading or improvement plan.

### 2.4.4.1.c:

The County certified archaeologist shall attend the pre-grading meeting with the contractors to explain and coordinate the requirements of the monitoring program.

### 2.4.4.1.d:

The monitor shall observe initial grading and/or ground surface preparation on all areas of the property that have not been previously cut. Initial grading shall be accomplished by a bulldozer or backhoe in less than 10-inch intervals within the primary portion of Locus A. Monitoring shall also be conducted for standard grading for all remaining portions of CA-SDI-5352 within the *SUNROAD CENTRUM* property. The grading monitoring shall continue to a depth where the monitor deems there is no longer a likelihood for the presence of prehistoric features.

### 2.4.4.1.e:

Isolates and clearly non-significant deposits will be minimally documented in the field and the monitored grading can proceed.

### 2.4.4.1.f:

If potentially significant archaeological artifact deposits and/or features are uncovered by the large equipment, the archaeologist shall divert, direct or temporarily halt grading activities and further expose the deposits using smaller equipment, such as a backhoe or bobcat, and by hand excavation. If the archaeologist finds that significant artifacts and/or features are present, the County of San Diego, Department of Planning and Land Use archaeologist shall be contacted to agree upon a data recovery plan. An adequate sample, as determined by the archaeologist, of the significant materials shall be removed by the archaeologist using standard archaeological excavation methods such as handpick, shovel, trowel and screen. Monitored project grading activities can continue on other areas of the property while archaeological evaluation or data recovery is completed.

### 2.4.4.1.g:

If significant archaeological materials are discovered, these shall be cataloged and analyzed using standard professionally accepted archaeological analytic techniques. Additional research and special studies conducted as appropriate to the materials recovered, to aid in analyzing and interpreting these materials.

### 2.4.4.1.h:

A report documenting the field and analysis results and interpreting the artifact and research data within the research context shall be completed and submitted to the satisfaction of the Director of Planning and Land Use. The report will include Department of Parks and Recreation Primary and Archaeological Site Forms.

# Significant Environmental Effects - 2.0

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## 2.4.4.1.i:

Processing and curation of all cultural materials collected during grading monitoring shall be conducted according to current professional repository standards. The collections and associated records shall be transferred, including title, to an appropriate curation facility within San Diego County and be accompanied by payment of the fees necessary for permanent curation, to the satisfaction of the Director of Planning and Land Use.

## 2.4.4.2 Site CA-SDI-12730:

### 2.4.4.2.a:

Site CA-SDI-12730 will be placed within the proposed open space easement on the project site.

### 2.4.4.2.b:

This locus will be fenced and the prehistoric site will be preserved in a natural state within the proposed open space easement.

## **2.4.5 Conclusions**

One significant prehistoric site (CA-SDI-12730) was identified on the project site. Site CA-SDI-12730 will be preserved within the proposed open space easement on-site. In addition, although Site CA-SDI-5352 was not determined significant, mitigation measures are recommended to avoid the potential impacts to undiscovered, buried significant resources during construction. With the implementation of the mitigation measures listed above, the potential impacts to cultural resources would be reduced to a level below significant.

## **2.5 Transportation/Circulation**

The Specific Plan EIR analyzed the impacts to transportation and circulation systems associated with the entire East Otay Mesa Specific Plan area (including the proposed *SUNROAD CENTRUM* project). However, since that analysis, the *SUNROAD CENTRUM* project has been modified slightly in that it now includes the extension of Otay Mesa Road to the SR-905. In addition, the proposed project would be developed in two phases to partially mitigate the traffic impacts associated with the project. Under a worst-case scenario, the first phase would be completed within two years of project approval and would include the development of the proposed industrial uses, and installation of traffic signals at the Old Otay Mesa Road/Harvest Road and Old Otay Mesa Road/Sanyo Avenue intersections, when traffic warrants are met. The second phase would include the development of designated regional commercial uses and the installation of a traffic signal at the Harvest Road/"B" Street intersection when traffic warrants are met. Phase II would not commence until either the SR-125 or SR-905 improvements are constructed and operational (see Appendix E for detailed description). It is anticipated, at this time, that the SR-125 improvements would be completed by the Year 2003 and the SR-905 improvements would be operational by the Year 2005. The proposed roadway extension and phasing was not taken into consideration during the analyses of the East Otay Mesa Specific Plan (1993). Therefore, the changes in the project description were included in the analyses provided in the *SUNROAD CENTRUM* traffic study. During the Initial Study for the proposed project, the County determined that a site specific traffic study

# Significant Environmental Effects – 2.0

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should be conducted to include the extension. The results of the site-specific traffic analysis are summarized below and the report is included as Appendix E of this SEIR.

## 2.5.1 Existing Conditions

The *SUNROAD CENTRUM* project site is located east of Interstate 805 (I-805) and north of SR-905 and Otay Mesa Road in the East Otay Mesa community of the County of San Diego. The project site is accessed by Otay Mesa Road to the south and Harvest Road to the west. On-site roads consist of Harvest Road (a dirt road along the western property line), and several dirt roads trending east-west and at the center over an existing knoll. The following is a brief description of the existing roadway system that surrounds the project area. Figure 2.5-1, *Existing Roadway Conditions Diagram*, depicts the lane configurations of each nearby intersection and the project's location in relation to the local roadway network.

### Existing Segments:

**State Route 905 (SR-905/Otay Mesa Road)** is an east-west, six-lane expressway which extends from Interstate 5 to the City of San Diego Otay Mesa community. Approximately one mile east of Interstate 805, there is a break in the route, and SR-905 becomes Otay Mesa Road. Otay Mesa Road is improved as a six-lane prime arterial from Heritage Road to 1,000 feet east of La Media Road, then it becomes a four-lane major arterial to the California/Mexico border.

**Old Otay Mesa Road** is a two-lane roadway with segments in both the County and City of San Diego. The segment within the County has a current capacity estimated to be equivalent to a Light Collector road. The County Circulation Element classifies Old Otay Mesa Road as a four-lane road between SR-125 and Harvest Road, and a prime arterial (six lanes) from Harvest Road to Alta Road.

**Airway Road** is an east-west two-lane roadway east of Britannia Boulevard to Enrico Fermi Drive. This segment of Airway Road has a current capacity estimated to be equivalent to a two-lane collector road with continual frontage property. Airway Road is an unimproved dirt road west of Britannia Boulevard. It is planned in the City of San Diego Circulation Element as a four-lane Major Arterial. Airway Road is a designated Bike Route east of La Media Road.

**Harvest Road** is a north-south two-lane unimproved road extending from Otay Mesa Road to Lone Star Road. Harvest Road is planned as a four-lane Major Road from Otay Mesa Road to Lone Star Road in the County's Circulation Element.

**Sanyo Avenue** is a north-south two-lane collector road south of Otay Mesa Road with the eastern half improved. Under the County's Circulation Element, Sanyo Avenue is planned as a four-lane major road south of Otay Mesa Road. North of Otay Mesa Road, Sanyo Avenue is planned to be constructed as a two-lane industrial collector road.

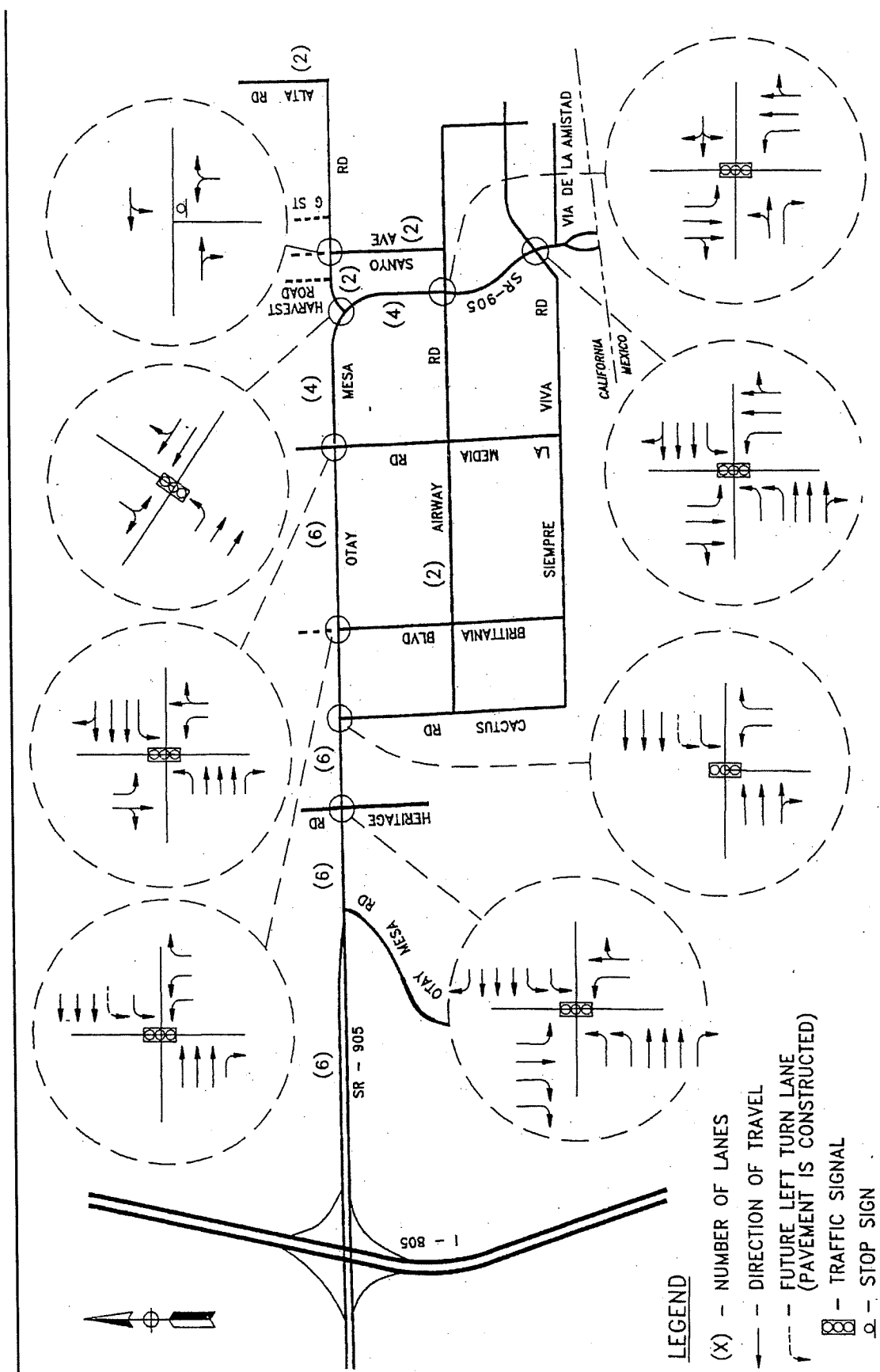


Figure 2.5-1  
 EXISTING ROADWAY CONDITIONS DIAGRAM  
 Page 2-49

## Significant Environmental Effects – 2.0

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**Lone Star Road** is planned in the County of San Diego Circulation Element as a prime arterial with bike lanes east of State Route 125.

**Enrico Fermi Drive** is constructed as a north-south two-lane commercial/industrial collector roadway south of Airway Road. North of Airway Road, Enrico Fermi Drive has not yet been constructed but it is part of the County's programmed road improvement projects. This segment of Enrico Fermi Road is scheduled to be constructed as a four-lane major road prior to the development of the proposed project. In the County of San Diego Circulation Element, Enrico Fermi Drive is planned as a major road from Siempre Viva Road to Lone Star Road.

Existing Intersections: the following existing intersections were included in the traffic analysis, conducted by Darnell & Associates.

Otay Mesa Road (SR-905)/Heritage Road  
Otay Mesa Road (SR-905)/Cactus Road  
Otay Mesa Road (SR-905)/Britannia Boulevard  
Otay Mesa Road (SR-905)/La Media Road  
Otay Mesa Road (SR-905)/Old Otay Mesa Road  
Otay Mesa Road (SR-905)/Airway Road  
Otay Mesa Road (SR-905)/Siempre Viva Road  
Old Otay Mesa Road/Sanyo Avenue

### Level of Service Standard

Level of Service (LOS) is a professional industry standard by which to measure the operating conditions of a given roadway segment or intersection. Level of service is defined on a scale of A to F, where LOS A represents free flowing traffic conditions with no restrictions on maneuvering or operating speeds, low traffic volumes and high speeds; LOS B represents stable flow, more restrictions, operating speeds beginning to be affected by traffic volumes; LOS C represents stable flow, more restrictions, speed and maneuverability more closely controlled by higher traffic volumes; LOS D represents conditions approaching unstable flow, traffic volumes profoundly affect arterials; LOS E represents unstable flow, and some stoppages; and LOS F represents forced flow, many stoppages, and low operating speeds. The County of San Diego encourages operation of LOS C or better at planned intersections and roadway segments. In developed areas, LOS D is an acceptable Level of Service for existing intersections and roadway segments. The project is located in a developed area with existing access routes; therefore, LOS D is an acceptable LOS at the existing intersections and roadway segments.

### Existing Traffic Volumes

AM and PM turn counts were taken by Darnell & Associates at the eight existing intersections. In addition, twenty-four hour machine counts were taken on Otay Mesa Road east of Britannia Boulevard, on Airway Road east of Otay Mesa Road (SR-905), and on Sanyo Avenue. Traffic counts from the City of San Diego Traffic Counts were used to determine the existing traffic volumes on Otay Mesa Road east of Heritage Road and south of Old Otay Mesa Road, and traffic

# Significant Environmental Effects – 2.0

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counts from the San Diego County, Master Traffic Census Listing was used to determine traffic volumes on Airway Road west of Otay Mesa Road (SR-905). Figure 2.5-2, *Existing Traffic Volumes*, depicts the average daily traffic volumes and the morning and afternoon peak hour turn volumes. Table 2.5-1, *Existing Daily Traffic Volumes and Level of Service Summary*, Table 2.5-2, *Existing Signalized Intersection Level of Service Summary*, and Table 2.5-3, *Existing Two-Way Stop-Controlled Intersection Level of Service Summary*, present the existing roadway and intersection conditions in the vicinity of the project site. These tables present a summary of the most recent available daily traffic volumes (ADTs).

## Roadway Segments

As shown by Table 2.5-1, all roadway segments, with the exception of Otay Mesa Road (State Route 905) between La Media Road to Old Otay Mesa Road and Airway Road between Otay Mesa Road (SR-905) and Sanyo Avenue Brittania Boulevard to La Media Road, operate at LOS C or better. The segment of Otay Mesa Road between La Media Road to Old Otay Mesa Road and Airway Road between Otay Mesa Road and Sanyo Avenue Brittania Boulevard to La Media Road operates at LOS E D.

## Intersections

Seven of the eight existing intersections are signalized. The Old Otay Mesa Road and Sanyo Avenue intersection is two-way stop controlled. Different methodologies were used to determine the levels of services for the two types of intersections. The level of service for signalized intersections is based on delay using variables such as lane configuration, traffic volumes and signal timings. The level of service at unsignalized intersections is determined by the longest delay time for any single turn move. The move with the longest delay is identified as the Critical Movement. As shown in Tables 2.5-2 and 2.5-3 all eight intersections operate at LOS C or better.

### 2.5.2 Thresholds of Significance

The roadway segments and intersections in the vicinity of the proposed project are located in the jurisdictions of both the City and the County of San Diego. The criteria for determining project significance depends on whether the roadway segment or intersection is located in the City or the County. Both the City's and the County's significance of impact criteria are discussed below.

#### City of San Diego

The City of San Diego uses a level of significance threshold which is outlined in the Traffic Impact Manual (City of San Diego, July 1998). The level of significance varies from an allowable increase of 10 percent or less for LOS A to an allowable increase of 2 percent or less for LOS D, E, or F. If the project causes a change greater than that outlined in the City's thresholds, the developer is considered to be responsible for all or part of the improvements required to mitigate site traffic to the level previously held on the facility prior to the project's traffic impacts. (A copy of the City of San Diego's Significant Transportation Impact Measures can be found in Appendix E.)

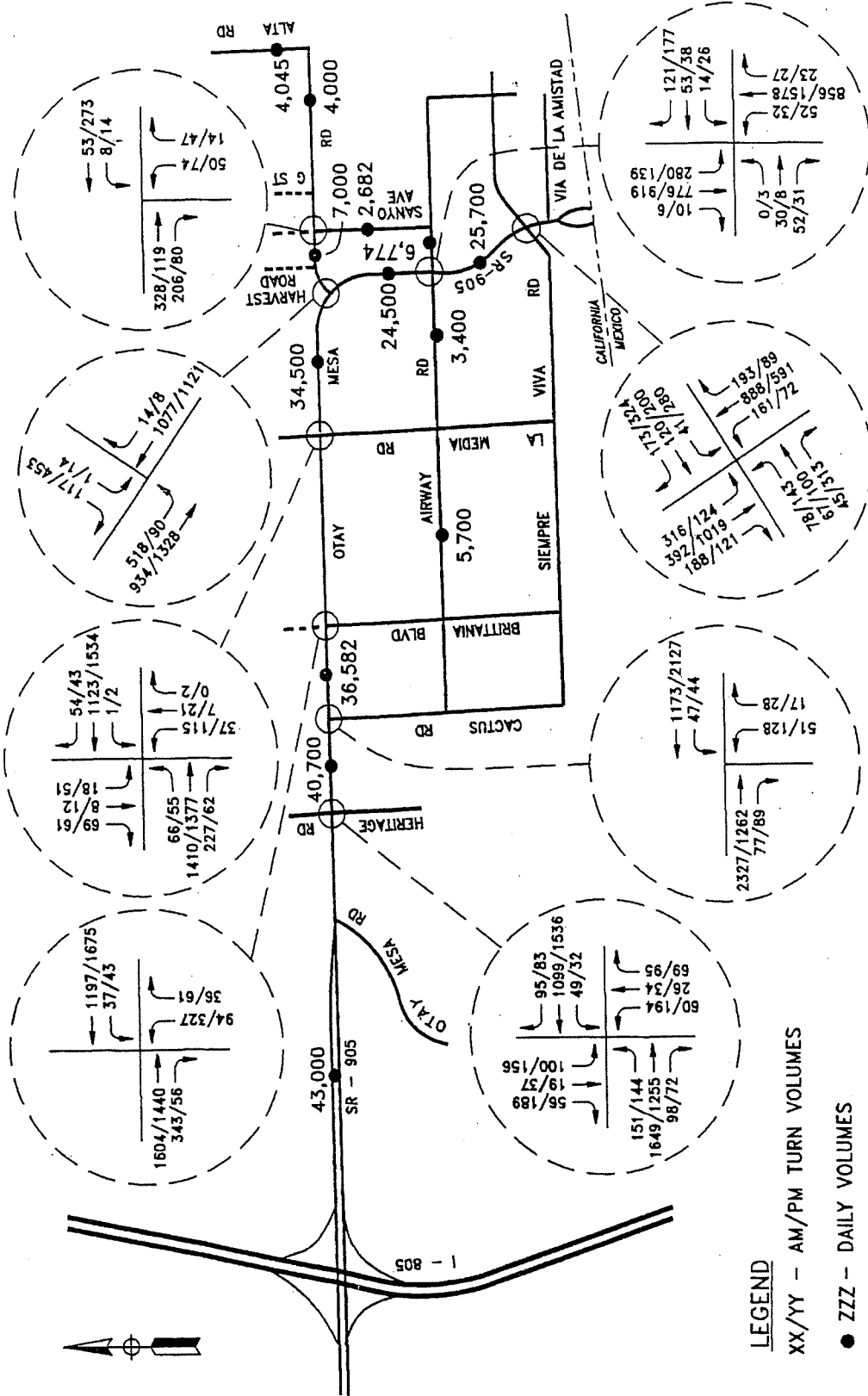


Figure 2.5-2  
 EXISTING TRAFFIC VOLUMES



# Significant Environmental Effects - 2.0

**TABLE 2.5-1  
EXISTING DAILY VOLUMES AND LEVEL OF SERVICE SUMMARY**

Segment	A.D.T.	Design Capacity	v/c Ratio	Level of Service
<b>Otay Mesa Road (State Route 905)</b>				
- East of I-805	43,000	80,000 <sup>a</sup>	0.54	C
- Heritage Road to Cactus Road	40,700	60,000 <sup>a</sup>	0.68	C
- Cactus Road to La Media Road	36,582	60,000 <sup>a</sup>	0.61	C
- La Media Road to Old Otay Mesa Road	34,500	60,000 <sup>a</sup>	<u>0.86</u>	<u>D</u>
- Old Otay Mesa Road to Airway Road	24,500	40,000 <sup>a</sup>	0.61	C
- Airway Road to Siempre Viva Road	25,700	40,000 <sup>a</sup>	0.64	C
<b>Old Otay Mesa Road</b>				
- Otay Mesa Road (SR-905) to Sanyo Avenue	7,000	10,000 <sup>a</sup>	0.70	C
- Sanyo Avenue to Alta Road	4,000	16,200 <sup>b</sup>	0.25	B
<b>Airway Road</b>				
- Britannia Boulevard to La Media Road	<u>5,700</u>	8,000 <sup>a</sup>	<u>0.71</u>	<u>D</u>
- La Media Road to Otay Mesa Road (SR-905)	<u>3,400</u>	8,000 <sup>a</sup>	<u>0.43</u>	<u>B</u>
- Otay Mesa Road (SR-905) Avenue	6,744	8,000 <sup>a</sup>	0.84	E
<b>Sanyo Avenue</b>				
- South of Old Otay Mesa Road	2,682	8,000 <sup>a</sup>	0.34	B
<sup>a</sup> These segments are located in the City of San Diego. <sup>b</sup> These segments are located in the County of San Diego.				

**TABLE 2.5-2  
EXISTING SIGNALIZED INTERSECTION LEVEL OF SERVICE SUMMARY**

Intersection	AM Peak		PM Peak	
	Delay (sec)	LOS	Delay (sec)	LOS
<b>Otay Mesa Road (SR-905) @</b>				
- Heritage Road	18.8	B	23.7	C
- Cactus Road	11.4	B	10.8	B
- Britannia Boulevard	11.2	B	12.5	B
- La Media Road	13.8	B	18.3	B
- Old Otay Mesa Road	24.4	C	29.1	C
- Airway Road	22.1	C	31.1	C
- Siempre Viva Road	26.2	C	26.5	C

# Significant Environmental Effects – 2.0

**TABLE 2.5-3  
EXISTING TWO-WAY STOP-CONTROLLED INTERSECTION LEVEL OF SERVICE SUMMARY**

Intersection	AM Peak			PM Peak		
	Approach	Delay (sec)	LOS	Approach	Delay (sec)	LOS
Old Otay Mesa Road @ - Sanyo Avenue	NB	12.8	B	NB	12.1	B
	WBL	8.6	A	WBL	7.7	A

The City of San Diego's Significant Transportation Impact Measures were applied to all roadway segments and intersections located within the City of San Diego and are so noted in the summary tables.

### County of San Diego

The County of San Diego Department of Public Works established a set of draft criteria to determine if the traffic generated by a proposed project will have a significant impact on the existing roadway network. At this time the significance of impact criteria is only applied to segments and intersections at LOS E or LOS F. The draft significance of impact criteria considers an increase in v/c ratio of 0.02 or less or an increase in delay of 2 seconds or less to be insignificant. These criteria were applied to all roadway segments and intersections located within the County of San Diego and are so noted in the summary tables. A copy of the County of San Diego draft significance of impact criteria can be found in Appendix E.

### **2.5.3 Analysis of Project Effects and Determination as to Significance**

#### Project Traffic Generation

The *SUNROAD CENTRUM* project would be developed in two phases. The first phase would include the development of 122.2 acres of industrial development. Under a worse-case scenario, Phase I would be completed within two years of approval and is therefore included in the near-term analysis below.

Phase II would consist of 34.4 acres of designated regional commercial uses west of Harvest Road, and would be developed upon completion of either the SR-125 or SR-905 improvements (to be completed by the Years 2003 and 2005 respectively) (see Appendix E for detailed description). Because Phase II would not be constructed until either the SR-125 or SR-905 improvements are completed, Phase II is not included in the near-term analysis, and instead included in the buildout traffic analysis.

## Significant Environmental Effects – 2.0

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Streets “A” through “G” would be constructed for internal circulation on-site, and Harvest Road, Sanyo Avenue, and Lone Star Road would be improved through the project site to provide access form surrounding areas.

The proposed project would provide three access points off of Old Otay Mesa Road at Harvest Road, Sanyo Avenue, and “G” Street. All three access points were analyzed in the traffic study and the results are provided below.

The number of vehicle trips estimated to be generated by the proposed project is based on traffic generation rates developed in the traffic study for the 1993 East Otay Mesa Specific Plan. The rates used to determine the number of trips that the project would generate are the same rates used in the 1993 Specific Plan EIR traffic study and forecast. Utilizing the given generation rates, estimates of daily and peak hour traffic volumes generated by the project were calculated. Table 2.5-4, *Project Trip Generation*, shows the project traffic generation calculations for both phases of development. As shown in Table 2.5-4, Phase I would generate 13,020 ADTs and Phase II would generate 13,760 ADTs. Thus, the total project traffic (Phase I and II combined) generation is calculated to generate 26,780 ADT, with 1,481 inbound/226 outbound trips during the AM peak hour and 931 inbound/1,869 outbound trips during the PM peak hour.

The project-generated traffic was distributed to the street system based on percentages, which are in-turn based on travel patterns in the project vicinity. Existing travel patterns indicate that 80 percent of the drivers would travel to and from the west on Otay Mesa Road, and 20 percent of the drivers would travel to and from the south with 15 percent traveling from across the California/Mexico border. Traffic volumes for Phase I of the proposed project were assigned to the local roadway network using the above percentage distributions.

The Phase I project trips were added to the existing daily and peak hour volumes measured in the field and are shown in Figure 2.5-3, *Phase I Project Traffic Volumes*. The traffic distribution for Phase II of the project would be different than Phase I because new infrastructure improvements proposed for SR-905 and SR-11 will absorb a majority of the east-west project traffic and the new SR-125 facilities will absorb a majority of the north-south traffic (see Appendix E for detailed description of improvements). Overall, the combination of future facility improvements would reduce the project traffic distribution traveling on Otay Mesa Road to 20%. The traffic impacts associated with Phase II of the propose project and cumulative projects in the Otay Mesa area were previously analyzed in the Specific Plan EIR. The traffic impacts associated with both phases are discussed in the following sections.

### Phase I

#### **2.5.3.1 through 2.5.3.3 Existing Plus Cumulative Projects and Proposed Project Roadway Segment Conditions**

Traffic generated by Phase I of the proposed project was added to the traffic volumes from the existing and cumulative projects to determine the project’s impacts in the short-term. The impact of cumulative projects in the area was addressed by applying the projected traffic counts from

# Significant Environmental Effects - 2.0

seven large scale projects to the existing traffic counts. Those seven projects include, 1) a power generating plant on a 46-acre site east of Alta Road in the East Otay Mesa community; 2) an auto storage, wrecking, and recycling facility on a 80-acre site east and west of Alta Road north of Old Otay Mesa Road; 3) a Travel Plaza truck stop on a 83.6-acre site east of Enrico Fermi Drive, north of Airway Road and south of Old Otay Mesa Road; 4) a 453,000-square-foot industrial center (warehousing) on the east side of Piper Ranch Road, south of Otay Mesa Road; 5) a small industrial park (Sunroad Otay Park) on 79.3 acres south of Otay Mesa Road and west of Piper Ranch Road; 6) a 40-acre truck park (La Media Truck Park II) on the east side of La Media north of Windstock Street; 7) a residential development (Robinhood Ridge Phase I) consisting of 520

**TABLE 2.5-4  
PROJECT TRIP GENERATION**

TRIP GENERATION RATES				
LAND USE	DAILY TRIP GENERATION RATE	AM PEAK HOUR PERCENTAGE OF DAILY (IN:OUT)	PM PEAK HOUR PERCENTAGE OF DAILY (IN:OUT)	
INDUSTRIAL	100 TRIPS/ ACRE	11% (9:1)	12% (2:8)	
ROADS	0 TRIPS/ACRE	N/A	N/A	
COMMERCIAL	400 TRIPS/ ACRE	2% (7:3)	9% (5:5)	
TRIP GENERATION				
LAND USE	TOTAL NO. OF UNITS	TOTAL DAILY TRIPS	AM PEAK HOUR TRIPS (IN:OUT)	PM PEAK HOUR TRIPS (IN:OUT)
PHASE I:				
▶ INDUSTRIAL	130.2 ACRES	13,020	1,432 (1,289:143)	1,562 (312:1,250)
▶ ROADS	29.7 ACRES	0	0	0
<b>TOTAL TRIPS GENERATED BY PHASE I:</b>		13,020	1,432 (1,289:143)	1,562 (312:1,250)
PHASE II:				
▶ COMMERCIAL	34.4 ACRES	13,760	275 (192:83)	1,238 (619:619)
<b>TOTAL TRIPS GENERATED BY PHASE II:</b>		13,760	275 (192:83)	1,238 (619:619)
<b>TOTAL TRIPS GENERATED BY BOTH PHASES:</b>		26,780	1,707 (1,481:226)	2,800 (931:1,869)

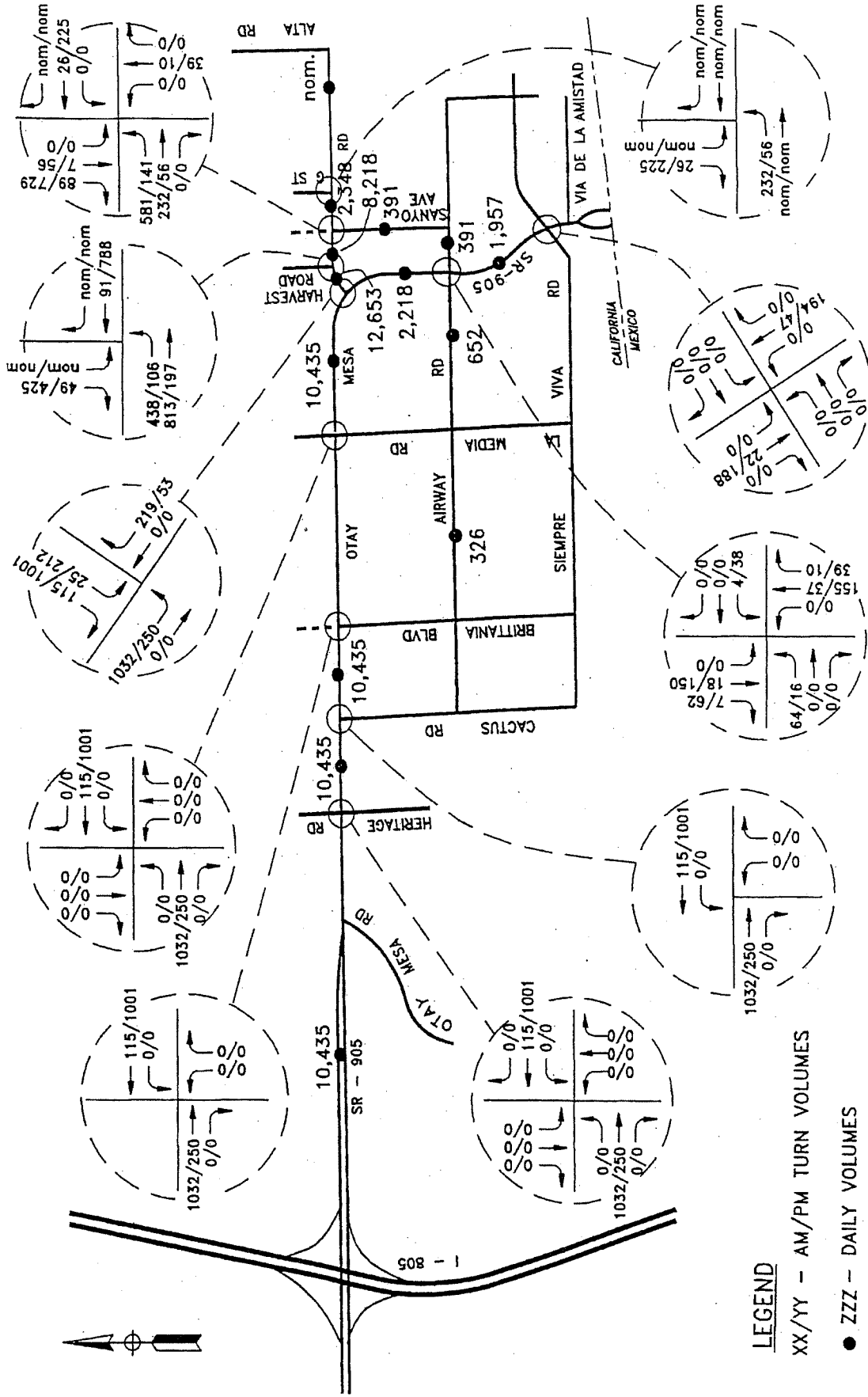


Figure 2.5-3  
 PHASE I PROJECT TRAFFIC VOLUMES

## Significant Environmental Effects – 2.0

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single family dwelling units, 178 multi-family dwelling units and 5.5 acres of park, located west of Otay Valley Road. Figure 2.5-4, *Existing Plus Cumulative Projects and Proposed Project Traffic Volumes*, depicts the traffic volumes that would result when the project traffic is added to existing conditions and the traffic volumes projected for cumulative projects. The results of both the cumulative projects' and the proposed project's impacts to roadway segments are summarized in Table 2.5-5, *Existing Plus Proposed Project and Cumulative Projects Roadway Segment Levels of Service*. Based on the significance criteria, the following roadway segments would be significantly impacted in the short-term and should require mitigation:

- Otay Mesa Road (SR-905) between the I-805 and Siempre Viva Road
- Old Otay Mesa Road from Otay Mesa Road (SR-905) to Sanyo Avenue
- Airway Road between Britannia Boulevard and Sanyo Avenue

### **2.5.3.2 Existing Plus Cumulative Projects and Proposed Project Roadway Intersection Conditions**

Figure 2.5-4, and Table 2.5-6, *Existing Plus Proposed Project and Cumulative Projects Intersection Level of Service*, show the results of traffic conditions in the short term when project traffic intersection volumes are added to existing and cumulative projects' traffic volumes. As summarized in Table 2.5-6, the following intersections would be significantly impacted in the short term and would require mitigation:

- Otay Mesa Road (SR-905) at Heritage Road
- Otay Mesa Road (SR-905) at Cactus Road
- Otay Mesa Road (SR-905) and La Media
- Otay Mesa Road (SR-905) at Old Otay Mesa Road

### **Phase II (Buildout)**

Phase II would include the development of 34.4 acres of commercial uses west of Harvest Road. This phase will take place in conjunction with the completion of either the SR-125 or SR-905 (improvements). These facilities will accommodate the total project traffic (Phase I and II combined), while improving the Level of Service (LOS) on Otay Mesa Road to an acceptable level. The combined capacity of the new facilities will be 270,000 Average Daily Trips (ADT) or twenty times the total trips generated by Phase II of the *SUNROAD CENTRUM* project. The forecasts used in previous documents (traffic studies included in the Brown Field and SR-125 EIRs) show that the LOS on various segments on Otay Mesa Road (between west of the SR-125 and SR-905 interchange) will range from B to D under buildout scenario.



# Significant Environmental Effects - 2.0

TABLE 2.5-5

EXISTING PLUS PROPOSED PROJECT AND CUMULATIVE PROJECTS ROADWAY SEGMENT LEVELS OF SERVICE

Roadway Segment	Existing + Other Approved/Pending Projects			Existing + Other Approved/Pending Projects + Proposed Project-Phase I			Increase in v/c Ratio	Significant Impact	
	Capacity	A.D.T.	v/c Ratio	LOS	Capacity	A.D.T.			v/c Ratio
<b>Otay Mesa Road (State Route 905)</b> - East of I-805 - Heritage Road to Cactus Road - Cactus Road to La Media Road - La Media Road to Old Otay Mesa Road - Old Otay Mesa Road to Airway Road - Airway Road to Siempre Viva Road	80,000 <sup>1</sup>	59,179	0.74	C	80,000 <sup>1</sup>	69,614	0.87	D	Yes <sup>3</sup>
	60,000 <sup>1</sup>	55,415	0.92	E	60,000 <sup>1</sup>	65,850	1.10	F	Yes <sup>3</sup>
	60,000 <sup>1</sup>	51,297	0.85	D	60,000 <sup>1</sup>	61,732	1.03	F	Yes <sup>3</sup>
	40,000 <sup>1</sup>	50,041	1.25	F	40,000 <sup>1</sup>	60,478	1.51	F	Yes <sup>3</sup>
	40,000 <sup>1</sup>	29,490	0.74	C	40,000 <sup>1</sup>	31,709	0.79	D	Yes <sup>3</sup>
	40,000 <sup>1</sup>	27,148	0.68	C	40,000 <sup>1</sup>	29,106	0.73	C	Yes <sup>3</sup>
<b>Old Otay Mesa Road</b> - Otay Mesa Road (SR-905) to Harvest Road - Harvest Road to Sanyo Avenue - Sanyo Avenue to "G" Street	10,000 <sup>1</sup>	11,360	1.14	F	10,000 <sup>1</sup>	24,013	2.40	F	Yes <sup>3</sup>
	10,000 <sup>1</sup>	11,360	1.14	F	10,000 <sup>1</sup>	19,578	1.96	F	Yes <sup>3</sup>
	16,200 <sup>2</sup>	8,360	0.52	D	16,200 <sup>2</sup>	10,708	0.66	D	NA <sup>4</sup>
<b>Airway Road</b> - Britannia Boulevard to La Media Road - La Media Road to Otay Mesa Road (SR-905) - Otay Mesa Road (SR-905) to Sanyo Avenue	8,000 <sup>1</sup>	5,808	0.73	D	8,000 <sup>1</sup>	6,134	0.77	D	Yes <sup>3</sup>
	8,000 <sup>1</sup>	3,616	0.45	C	8,000 <sup>1</sup>	4,268	0.53	C	Yes <sup>3</sup>
	8,000 <sup>1</sup>	10,100	1.26	F	8,000 <sup>1</sup>	10,491	1.31	F	Yes <sup>3</sup>
<b>Sanyo Avenue</b> - South of Old Otay Mesa Road	8,000 <sup>1</sup>	2,682	0.34	B	8,000 <sup>1</sup>	3,073	0.38	B	No <sup>3</sup>

<sup>1</sup> Segment located in the City of San Diego.

<sup>2</sup> Segment located in the County of San Diego.

<sup>3</sup> Impact Significance is based on the City of San Diego Impact Measures.

<sup>4</sup> Impact Significance is based on the County of San Diego's draft criteria.

NA = Not Applicable



# Significant Environmental Effects - 2.0

TABLE 2.5-6  
EXISTING PLUS PROPOSED PROJECT AND CUMULATIVE PROJECTS INTERSECTION LEVELS OF SERVICE<sup>4</sup>

Intersection	Existing + Other Approved/Pending Projects						Existing + Other Approved/Pending Projects						
	Existing + Other Approved Pending Projects			AM Peak			AM Peak			PM Peak			
	Delay (sec)	LOS	PM Peak Delay (sec)	LOS	Delay (sec)	LOS	Delay (sec)	LOS	Increase in Delay	Significant Increase	Delay (sec)	LOS	Increase in Delay
<b>Otay Mesa Road (SR-905) @</b> - Heritage Road - Cactus Road - Britannia Boulevard - La Media Road - Old Otay Mesa Road - Airway Road - Siempre Viva Road	32.8	C	64.5	E	94.1	F	61.3	Yes <sup>1</sup>	329.0	F	264.5	Yes <sup>1</sup>	
	18.7	B	21.5	C	104.0	F	85.3	Yes <sup>1</sup>	107.5	F	86.0	Yes <sup>1</sup>	
	12.3	B	16.7	B	15.8	B	3.5	No <sup>1</sup>	49.7	D <sup>3</sup>	33.0	Yes <sup>1</sup>	
	17.1	B	39.5	D <sup>3</sup>	20.2	C	3.1	No <sup>1</sup>	197.7	F	158.2	Yes <sup>1</sup>	
	34.4	C	195.1	F	*	F	*	Yes <sup>1</sup>	*	F	*	Yes <sup>1</sup>	
	37.0	D	38.8	D	42.0	D <sup>3</sup>	5.0	Yes <sup>1</sup>	47.4	D <sup>3</sup>	8.6	Yes <sup>1</sup>	
31.2	C	29.1	C	34.6	C	3.4	No <sup>1</sup>	32.0	C	2.9	No <sup>1</sup>		
<b>Old Otay Mesa Road @</b> - Sanyo Avenue - Harvest Avenue	-	-	-	-	24.2	C	-	NA <sup>2</sup>	25.9	C	-	NA <sup>2</sup>	
	-	-	-	-	11.1	B	-	NA <sup>2</sup>	17.4	B	-	NA <sup>2</sup>	
<b>Old Otay Mesa Road @</b> - "G" Street (OWSC) Eastbound Left Southbound	-	-	-	-	8.1	A	-	NA <sup>2</sup>	9.3	A	-	NA <sup>2</sup>	
	-	-	-	-	8.6	A	-	NA <sup>2</sup>	12.1	B	-	NA <sup>2</sup>	
	-	-	-	-	-	-	-	-	-	-	-	-	

<sup>1</sup> Impact Significance is Based on the City of San Diego Impact Measures.

<sup>2</sup> Significance is based on the County of San Diego's draft criteria.

<sup>3</sup> Intersection has movements that operate at LOS E or LOS F.

<sup>4</sup> Based on Phase I of the proposed project.

\* Delay on at least one movement exceeds 999.9 seconds.

NA = Not Applicable

OWSC = One-Way Stop Controlled

# Significant Environmental Effects – 2.0

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Table 2.5-7, *Buildout Level of Service Summary*, shows the results of evaluating the operating conditions of the area roadways under the buildout scenario. As shown in Table 2.5-7, all road way segments would operate at LOS D or better. Although, segments of SR-125 and SR-905 will operate at unacceptable Levels of Service within the study area, those levels were adopted by the respective responsible agencies during the environmental processes for both projects.

## 2.5.4 Mitigation Measures

### Mitigation for Newly Identified Traffic Impacts

The traffic generated by the proposed project will result in direct and significant short-term traffic impacts to on-site and off-site road segments and intersections. The mitigation measures described in this section will reduce the on-site impacts to a level of insignificance. The proposed off-site measures would mitigate the impacts with the construction of additional lane capacity and “fair share” contributions to planned future improvements.

#### SEGMENTS (On-site)

##### 2.5.4.1 Old Otay Mesa Road

~~The north half of Old Otay Mesa Road from Harvest Road to the eastern property boundary should be improved to prime arterial standards, as per the County of San Diego “Draft Conditions”. The improvement will provide 44' of pavement, and when combined with the existing pavement would allow the striping of a four-lane collector road. The capacity of this segment will be raised to 30,000 ADT at LOS E by city standards, and would mitigate the impact of project traffic on this segment.~~

##### 2.5.4.1.a:

###### Between the Eastern Subdivision Line and Harvest Road:

Prior to recordation of the Final Map for any unit, the applicant shall improve or agree to improve Otay Mesa Road from the eastern subdivision boundary to the western subdivision boundary (Harvest Road) in accordance with the County of San Diego Tentative Map Conditions. The improvements shall include a one half graded width of sixty-six feet (66') with fifty-six (56') of pavement, curb and gutter, a sidewalk with the curb at fifty-six (56') feet from the centerline. The improvements will provide two twelve-foot-wide eastbound lanes on Old Otay Mesa Road between the eastern subdivision boundary and Harvest Road. The improvements shall also provide for transitions and tapers to match up with the existing pavement. This measure would mitigate the traffic impacts on this segment to a level below significant.

##### 2.5.4.1.b:

###### Harvest Road North of Old Otay Mesa Road:

Prior to recordation of the Final Map for Phase I of the project, the applicant shall improve or agree to improve Harvest Road in accordance with the with the County of San Diego Tentative Map Conditions. The improvements shall provide for one-half graded width of fifty-four (54') with forty-four (44') of pavement, curb and gutter, and sidewalk with the curb at forty-four (44')

# Significant Environmental Effects - 2.0

**TABLE 2.5-7  
BUILDOUT LEVEL OF SERVICE SUMMARY**

Segment	A.D.T.	Capacity	v/c Ratio	Level of Service
<b>State Route 125 (6 Lanes)</b>				
- South of Airway Road	98,000	120,000 <sup>a</sup>	0.82	D
- Airway to Lone Star Road	111,000	120,000 <sup>a</sup>	0.93	E
- North of Lone Star Road	141,000	120,000 <sup>a</sup>	1.18	F
<b>State Route 905 (6 Lanes)</b>				
- Heritage Road to La Media Road	131,000	120,000 <sup>a</sup>	1.09	F
<b>Otay Mesa Road</b>				
- La Media Road to Piper Ranch Road	23,000	60,000 <sup>a</sup>	0.38	A
- Piper Ranch Road to Ellis Road	22,000	60,000 <sup>b</sup>	0.37	A
- Ellis Road to Harvest Road	55,000	60,000 <sup>b</sup>	0.92	D
- Harvest Road to Sanyo Avenue	45,000	60,000 <sup>b</sup>	0.75	D
- Sanyo Avenue to Paseo De Las Americas	43,000	57,000 <sup>c</sup>	0.75	C
- Paseo De Las Americas to Enrico Fermi Drive	33,000	57,000 <sup>c</sup>	0.58	B
- Enrico Fermi Drive to Alta Road	25,000	57,000 <sup>c</sup>	0.44	B
<b>Airway Road</b>				
- Britannia Boulevard to La Media Road	21,000	40,000 <sup>a</sup>	0.53	C
- La Media Road to Harvest Road	16,000	40,000 <sup>a</sup>	0.40	B
- Harvest Road to Sanyo Avenue	14,000	40,000 <sup>a</sup>	0.35	A
<b>Sanyo Avenue</b>				
- North of Otay Mesa Road	3,000	16,200 <sup>c</sup>	0.19	B
- South of Otay Mesa Road	2,000	15,000 <sup>a</sup>	0.13	A
<sup>a</sup> These segments are located in the City of San Diego. <sup>b</sup> These segments are located in both the County of San Diego and City of San Diego. <sup>c</sup> These segments are located in the County of San Diego.				

## Significant Environmental Effects - 2.0

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from the centerline. The improvements shall also provide for transitions and tapers to match up with the existing pavement. This measure would mitigate the traffic impacts on this segment to a level below significant.

### 2.5.4.1.c:

#### Sanyo Avenue North of Old Otay Mesa Road:

Prior to recordation of the Final Map for Phase I of the project, the applicant shall improve or agree to improve Sanyo Avenue in accordance with the with the County of San Diego Tentative Map Conditions. The improvements shall provide for a graded width of eighty-eight (88') with sixty-eight (68') of pavement, curb and gutter, and sidewalk with the curb at forty-four (34') from the centerline. This measure would mitigate the traffic impacts on this segment to a level below significant.

### 2.5.4.1.d:

#### "G" Street North of Old Otay Mesa Road:

Prior to recordation of the Final Map for Phase I of the project, the applicant shall improve or agree to improve "G" Street in accordance with the with the County of San Diego Tentative Map Conditions. The improvements shall provide for a graded width of eighty-eight (88') with sixty-eight (68') of pavement, curb and gutter, and sidewalk with the curb at forty-four (34') from the centerline. This measure would mitigate the traffic impacts on this segment to a level below significant.

## SEGMENTS (Off-site)

### 2.5.4.2. Old Otay Mesa Road

This segment of Otay Mesa Road is just west of the site between Harvest Road and Otay Mesa Road (SR-905). The half width prime arterial improvements discussed above should be extended approximately 600' to the intersection of Old Otay Mesa Road and Otay Mesa Road (SR-905). Pursuant to a reimbursement agreement with the County, the applicant shall construct this improvement. The applicant will be reimbursed by the County for those costs that exceed the project's fair share contribution:

Prior to recordation of the Final Map for any unit, the applicant shall improve or agree to improve Otay Mesa Road between Harvest Road and Otay Mesa Road (SR-905) per the County of San Diego Tentative Map Conditions. Improvements to Otay Mesa Road shall be provided according to one of the following improvement options:

1. From the western subdivision boundary (Harvest Road) to the existing SR 905, provide a minimum graded width of sixty-four feet (64'), two twelve-foot eastbound lanes, two twelve-foot westbound lanes, and eight-feet of paved shoulders. The SR 905/Otay Mesa Road intersection shall be constructed to provide at a minimum: dual left-turn lanes for eastbound traffic; left-turn lane for southbound traffic; right-turn lane for eastbound traffic; dual right-turn lanes for westbound traffic; traffic signal with interconnections; all traffic striping and signage. All of the foregoing to the satisfaction of CalTrans, the City of San Diego and the Director of Public Works. Airway Road, from SR 905 to Sanyo Avenue,

## Significant Environmental Effects – 2.0

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- shall be constructed and/or re-stripped to provide two westbound through lanes to the satisfaction of the City of San Diego and the Director of Public Works.
2. The existing intersection of Otay Mesa Road with SR 905 shall be improved and realigned to provide a separate right turn access and additional left turn pockets. A detailed traffic and engineering study shall also required to verify the engineering/intersectional geometrics that are needed to ensure that LOS D or better is provided and that geometrics conform to the design standards of the City of San Diego and Caltrans. All of the foregoing to the satisfaction of the City of San Diego, Caltrans and the Director of Public Works.
  3. Otay Mesa Road shall be improved and realigned by others (by Caltrans, City of San Diego, County of San Diego and/or others) to provide a through street between Harvest Road and La Media (by Caltrans, City of San Diego, County of San Diego and/or others) to the satisfaction of the County and the City of San Diego. The improvements shall provide for a LOS "D" or better on this segment of Otay Mesa Road and the intersection with Otay Mesa Road and SR 905. The developer may construct or pay fair share contributions toward the above improvement. If the developer constructs the road improvement himself, which is found to be beyond his fair share, the developer may enter into a reimbursement agreement for the amount in excess of his fair share. All of the foregoing to the satisfaction of the City of San Diego, Caltrans and the Director of Public Works.

This measure will reduce the traffic impacts on this segment to a level below significant.

### Otay Mesa Road (SR-905)

The segments of this facility between Heritage Road and Old Otay Mesa Road will be impacted by project traffic in the short term. The typical mitigation measure for the impact of this project would be to construct an additional through lane in each direction to serve the forecast traffic volumes at an acceptable level of service. However, in this case the soon to be constructed SR-905 and SR-125 improvements (completion dates of 2003 and 2005 respectively) will reduce the near term cumulative volumes and improve the Level of Service on this portion of Otay Mesa Road to an acceptable level. Therefore the proposed mitigation would be temporary and is not recommended. In addition, the buildout forecast for the East Otay Mesa SPA shows that a six-lane prime arterial will serve volumes at an acceptable level of service.

### INTERSECTIONS (On-Site)

#### 2.5.4.3 Old Otay Mesa Road with Harvest Road, Sanyo Avenue, and "G" Street:

Per the County of San Diego's conditions of approval, the applicant shall construct a traffic signal with dual eastbound left turn lanes at the intersections of Old Otay Mesa Road/Harvest Road and Old Otay Mesa Road/ Sanyo Avenue. In addition, the applicant shall provide an eastbound left turn lane at the intersection of Otay Mesa Road and "G" Street.

# Significant Environmental Effects - 2.0

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## INTERSECTIONS (Off-Site)

Otay Mesa Road (SR-905) with Heritage Road, Cactus Road, and La Media Road

The short-term impacts from the proposed project at the intersections of Heritage Road, Cactus Road, and La Media Road with Otay Mesa Road (SR-905) are considered significant and should be mitigated. However, with the scheduled completion of SR-905, SR-125, and SR-11 the east/west through-traffic off of Otay Mesa Road (SR-905) would improve the Level of Service of the intersections along Otay Mesa Road (SR-905) to an acceptable level. Therefore, the mitigation measures shown in Table 16 in Appendix E of this SEIR would be temporary because they are not needed to serve buildout traffic volumes on Otay Mesa Road, and are not recommended.

Otay Mesa Road (SR-905)/Old Otay Mesa Road (see 2.5.4.2)

The improvement of this intersection is part of the Old Otay Mesa Road segment improvement described previously in this section (see 2.5.4.2). ~~The extension of the half width improvements to this intersection will allow the striping of the southbound approach to be three lanes, 1 left turn lane and 2 right turn lanes. Pursuant to a reimbursement agreement with the County, the applicant will construct the additional eastbound left, westbound through, and westbound right turn lanes (see the figure in Appendix E). The applicant will be reimbursed by the County for those costs that exceed the project's fair share contribution.~~

### Previously Identified Mitigation Measures

*The County shall work with the Cities of San Diego and Chula Vista to resolve the inconsistencies in future roadway designations and shall coordinate roadway design and implementation at jurisdictional boundaries.*

No inconsistencies in future roadway designations exist within or adjacent to the proposed project. Several meetings were conducted in late 1999 and early 2000 among the effected agencies in order to coordinate roadway design of the proposed *SUNROAD CENTRUM* project. County staff shall continue to coordinate with such agencies on an on-going basis as necessary during implementation of the proposed project.

*Project-specific traffic analyses should be required for all major developments proposed within the East Otay Mesa Specific Plan area.*

A project-specific traffic analysis was prepared for the *SUNROAD CENTRUM* project and is provided as Appendix E of this SEIR.

### 2.5.5 Conclusions

Due to the minor change (the extension of Otay Mesa Road to the SR-905) in the project description for the proposed *SUNROAD CENTRUM* project, the County determined that a site-

# Significant Environmental Effects - 2.0

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specific traffic study needed to be conducted. The traffic study concluded that the proposed project would have a significant impacts to three roadway segments and four intersections in the short-term (Phase I). The mitigation measures proposed above would reduce the short-term traffic impacts to a level below significant, except for one roadway segment (Otay Mesa Road) and the three intersections on Otay Mesa Road. Mitigation measures are not recommended for those short-term impacts because they are infeasible. These short-term impacts would be mitigated with the completion of the SR-905 improvements and the opening of SR-125.

## **2.6 Air Quality**

The East Otay Mesa Specific Plan EIR analyzed the impacts to air quality associated with the entire East Otay Mesa Specific Plan area (including the proposed *SUNROAD CENTRUM* project). Since that analysis, the *SUNROAD CENTRUM* project has been modified slightly in that it now includes the extension of Otay Mesa Road to connect to the SR-905. That modification would not affect the type of uses and number of vehicular trips that would be generated from the proposed project. Accordingly, air emissions from the proposed project would not change and additional analysis would not be required in this SEIR. However, during the Initial Study for the proposed project, the County determined that there was a potential need for additional analysis of air quality impacts. Based on further analysis of the project, the County determined that additional analysis is not required. Therefore, the discussions provided below are based on the previous analyses conducted in the previous EIR.

### **2.6.1 Existing Conditions**

The *SUNROAD CENTRUM* project site encompasses 250.5 acres of undeveloped land located east and west of Harvest Road and immediately north of Otay Mesa Road in the County of San Diego, California. The property is nearly flat-lying to steeply sloping with elevation ranging from approximately 630 Mean Sea Level (MSL) in the central portion of the site to approximately 430 feet MSL at the bottom of Johnson Canyon, near the site's northeastern corner. Mound and swale ("mima mound") topography characterizes the relatively horizontal mesa top located in the north-central portion of the property.

The project site is located within the San Diego air basin. The California Air Resources Board (CARB) has designated the air basin as "in attainment" for all of the State and Federal Ambient Air Quality Standards (AAQs) except for Ozone (O<sub>3</sub>) and PM<sub>10</sub> (particulate matter smaller than 10 microns) (see Table 2.6-1, *State of California - Air Resources Board, Ambient Air Quality Standards*). A pollutant is designated "non-attainment" if there was at least one violation of a state and/or federal standard for that pollutant in the area. As shown in Table 2.6-2, *Project Area Air Quality Monitoring Summaries*, the state and federal ozone standards were exceeded 92 and 6 days, respectively, from 1991 to 1998. Although, the federal PM<sub>10</sub> standard was not exceeded, 24% of the air samples taken during the eight-year monitoring period did exceed the state PM<sub>10</sub> standard. The ambient air measurements in Table 2.6-2 were taken at the Otay Mesa pollution monitoring station by the San Diego County Air Pollution Control District (the agency responsible for air quality planning, monitoring, and enforcement in the San Diego Air Basin).

# Significant Environmental Effects - 2.0

**TABLE 2.6-1  
STATE OF CALIFORNIA  
AIR RESOURCES BOARD AMBIENT AIR QUALITY STANDARDS**

POLLUTANT	AVERAGING TIME	CALIFORNIA STANDARDS	FEDERAL PRIMARY STANDARDS	ATTAINMENT YES/NO	
		CONCENTRATION	CONCENTRATION	STATE	FEDERAL
Ozone	1 Hour	0.09 ppm	0.12 ppm	NO	NO
	8 Hour	--	0.08 ppm		
Respirable Particulate Matter (PM <sub>10</sub> )	Annual Geometric Mean	30 µg/m <sup>3</sup>	--	NO	NO
	24 Hours	50 µg/m <sup>3</sup>	150 µg/m <sup>3</sup>		
	Annual Arithmetic Mean	--	50 µg/m <sup>3</sup>		
Fine Particulate Matter (PM <sub>2.5</sub> )	24 Hour	No State Standard	65 µg/m <sup>3</sup>	N/A	NO
	Annual Arithmetic Mean		15 µg/m <sup>3</sup>		
Carbon Monoxide	8 Hours	9 ppm	9 ppm	YES	YES
	1 Hour	20 ppm	35 ppm		
Nitrogen Dioxide	Annual Arithmetic Mean	--	0.053 ppm	YES	YES
	1 Hour	0.25 ppm	--		
Lead	30 days average	1.5 µg/m <sup>3</sup>	--	YES	N/A
	Calendar Quarter	--	1.5 µg/m <sup>3</sup>		
Sulfur Dioxide	Annual Arithmetic Mean	--	0.03 ppm	YES	YES
	24 Hours	0.04 ppm	0.14 ppm		
	1 Hour	0.25 ppm	--		



## Significant Environmental Effects - 2.0

Visibility Reducing Particles	8 Hours (10 a.m. to 6 p.m., PST)	In sufficient amount to reduce the visual range to less than 10 miles at relative humidity less than 70 percent.	No Federal Standard	YES	N/A
Sulfates	24 Hours	25 $\mu\text{g}/\text{m}^3$	No Federal Standard	YES	N/A
Hydrogen Sulfide	1 Hour	0.03 ppm	No Federal Standard	YES	N/A

\* Unclassified/Unclassifiable

# Significant Environmental Effects - 2.0

**Table 2.6-2**  
**PROJECT AREA AIR QUALITY MONITORING SUMMARIES**  
 (Number of Days Standards Were Exceeded and Maxima for Period Indicated)  
 (entries expressed in ratios = samples exceeding/samples taken)

POLLUTANT/STANDARD	1991	1992	1993	1994	1995	1996	1997	1998
<b>Ozone:</b>								
1-Hour > 0.09 ppm	28	16	10	9	17	6	6	0
1-Hour > 0.12 ppm	2	3	0	0	1	0	0	0
Maximum 1-Hour Conc. (ppm)	0.14	0.13	0.12	0.12	0.16	0.11	0.12	0.09
<b>Carbon Monoxide:</b>								
1-Hour > 20. ppm (a)	0	0	0	0	0	0	0	0
8-Hour > 9. ppm (a, b)	0	0	0	0	0	0	0	0
Maximum 1-Hour Conc. (ppm)	14	8	8	6	9	12	8	5
Maximum 8-Hour Conc. (ppm)	4.9	4.8	4.0	4.8	6.3	6.0	4.6	4.0
<b>Nitrogen Dioxide:</b>								
1-Hour > 0.25 ppm (a)	0	0	0	0	0	0	0	0
Maximum 1-Hour Conc. (ppm)	0.12	0.13	0.08	0.13	0.11	0.12	0.11	0.13
<b>Particulate Sulfate:</b>								
24-Hour > 50 $\mu\text{g}/\text{m}^3$	0/21	0/29	0/31	0/34	0/30	0/45	1/53	1/-
Maximum 24-Hour Conc. ( $\mu\text{g}/\text{m}^3$ )	11.2	9.9	19.0	15.4	22.0	24.0	27.0	-
<b>Respirable Particulates (PM-10):<sup>1</sup></b>								
24-Hour > 50 $\mu\text{g}/\text{m}^3$ (a)	7/20	2/60	9/31	24/65	20/59	15/54	3/60	18/61
24-Hour > 150 $\mu\text{g}/\text{m}^3$ (b)	0/60	0/60	0/31	0/65	0/59	0/54	0/60	0/61
Maximum 24-Hour Conc. ( $\mu\text{g}/\text{m}^3$ )	73	54	127	129	121	93	74	89
Note: Standards for sulfur dioxide and particulate lead have been met with a wide margin of safety in 1991-98, and are, therefore, not shown. Data came from the Otay Mesa station, located at the Otay Mesa Port of Entry.  (a) = State AAQS    (b) = National AAQS    (c) = State first-stage smog alert level    - = Not Available								

Source: California Air Resources Board, Summary of Air Quality Data, 1991-1998.

The Otay Mesa station is presumed to be the most representative of air pollution exposure in the project vicinity.

National Ambient Air Quality Standards (AAQS) were established in 1971 for six pollution species. States have the option to add other pollutants, require more stringent compliance, or to include different exposure periods. Because California had established more stringent State AAQS before the federal action and because of unique air quality problems introduced by the

## Significant Environmental Effects – 2.0

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restrictive dispersion meteorology, there is considerable difference between state and national clean air standards. Those standards currently in effect in California are shown in Table 2.6-1. The established standards are the levels of air quality considered safe, with an adequate margin of safety, to protect those people most susceptible to further respiratory distress such as asthmatics, the elderly, very young children, people already weakened by other disease or illness, and persons engaged in strenuous work or exercise, called “sensitive receptors.”

The continued violations of national ambient air quality standards (AAQS) in the SDAB, particularly those for ozone in inland foothill areas, requires that a plan be developed outlining the pollution controls that will be undertaken to improve air quality. In San Diego County, this attainment planning process is embodied in the Regional Air Quality Strategies (RAQS) developed jointly by the Air Pollution Control District (APCD) and the San Diego Association of Governments (SANDAG).

A plan to meet the federal standard for ozone was developed in 1994 during the process of updating the 1991 state-mandated plan. This local plan was combined with those from all other California non-attainment areas with serious ozone problems to create the California State Implementation Plan (SIP). The SIP included various projects in the forecast models, which determined the air basin’s ability to achieve attainment of ozone in 1999. If a proposed project was included in the modeling then the project has been anticipated within the regional air quality process. The SIP was adopted by the Air Resources Board (ARB) after public hearings on November 9-10, 1994, and forwarded to the U.S. Environmental Protection Agency (EPA) for their approval. After considerable analysis and debate, particularly regarding airsheds with the worst smog problems, EPA approved the SIP in mid-1996.

The SIP and RAQS were last updated in 1997. Current air quality and growth planning utilize the SANDAG Series 8 projections. Within the last decade, the San Diego Air Basin has reached attainment status for the state and/or federal standards for carbon monoxide. The federal ozone standard is expected to be met within the basin beginning in the year 2000 on those days without substantial intrusion of polluted air from outside the air basin. Until the basin meets the federal ozone standard for the required three-year period, it will continue to be classified as “non-attainment” for ozone. The State PM-10 standard is expected to be exceeded until well into the current decade.

### 2.6.2 Thresholds of Significance

The County does not have specified thresholds of significance for air quality impacts. Therefore, the determination of significant impacts listed in the State CEQA Guidelines (California, 1998/1999) and restated below was used:

1. Increase ambient pollutant levels from below to above the National Ambient Air Quality Standards (NAAQS) or California Ambient Air Quality Standards (CAAQs);
2. Substantially contribute to and existing projected air quality standard violation;

## Significant Environmental Effects – 2.0

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3. Are inconsistent with emission growth facts contained in any air quality maintenance of attainment plans (inconsistent projects include those exceeding the land use and population forecasts that were used to generate emission forecasts in these plans), including the RAQs.
4. Create objectionable odors;
5. Significantly alter air movement, moisture or temperature, or change in climate, either locally or regionally; or
6. Expose sensitive receptors or the public to substantial levels of toxic air contaminants.

### 2.6.3 Analysis of Project Effects and Determination as to Significance

#### 2.6.3.1 and 2.6.3.2:

The proposed *SUNROAD CENTRUM* project would be built essentially the same as was proposed in the East Otay Mesa Specific Plan EIR. Therefore, the amount of emissions from proposed construction activities, project-related vehicular travel, and small stationary sources (i.e., natural gas-fired furnaces and water heaters) would be the same, and thus, additional analysis of the project-related air emissions would not be required in this SEIR. Even with the minor modification to the project (the proposed connection to the SR-905), vehicular conditions are not expected to significantly change, and thus, air emissions from vehicular-related activities would not change. However, the Initial Study that was released on September 23, 1999, for public review determined that there was a potential need for re-analysis. Upon further review of the analyses provided in the previous EIR, the County determined that additional air quality studies are not required. The following discussion of air quality impacts, as they relate to the proposed project, is based solely on the analyses conducted in the previous EIR.

As discussed above, if a project was included in the forecast modeling for the 1991 SIP then the proposed project would presumably not have an adverse impact on the region's air quality. The magnitude of emissions associate with the EOMSP projects (including the *SUNROAD CENTRUM* project) was not anticipated in the SIP because the proposed development was redefined with greater intensities. Therefore, regional emissions at buildout are likely to be greater than forecasted and therefore would be considered a significant air quality impact.

The East Otay Mesa Specific Plan EIR identified the primary source of air pollutants as those that would be generated from vehicle trips associated with the proposed project. The vehicle trips generated from the *SUNROAD CENTRUM* project would result in 26,800 average daily trips. Emissions from those trips together with the emissions from the other projects proposed within the East Otay Mesa Specific Plan area were considered a substantial increase over the existing ambient air quality in the project area. The project's contribution to the San Diego region's current inability to meet federal and state air quality standards for ozone and PM<sub>10</sub> and would be considered a cumulatively significant impact and is discussed in Section 3.0, CUMULATIVE

# Significant Environmental Effects - 2.0

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IMPACTS, of this SEIR and Section 7.9, CUMULATIVE IMPACTS, of the East Otay Mesa Specific Plan EIR.

## 2.6.4 Mitigation Measures

The East Otay Mesa Specific Plan EIR determined that the following mitigation measures are consistent with the RAQS as well as the Transportation System Management and Transportation Demand Management techniques included in the Circulation Element of the Specific Plan, and would therefore mitigate the air quality impacts to a level below significant. Accordingly, the project applicant shall implement the applicable mitigation measures. However, the project's contribution to regional air emissions would remain cumulatively significant.

### 2.6.4.1:

Construction Mitigation Measures: *The County shall require applicants to use combinations of the following techniques to reduce potentially significant construction emissions:*

- *minimize simultaneous operation of multiple construction equipment units*
- *minimize the area being graded at any one time (i.e., grade only those areas which will be developed in the immediate future)*
- *use low pollutant-emitting construction equipment*
- *use [alternative fueled] or electrical construction equipment, [where economically feasible]*
- *use catalytic reduction for gasoline-power equipment*
- *use injection timing retard for diesel-powered equipment*
- *water the construction area to minimize fugitive dust*
- *halt grading during periods fo high wind (>20 mph)*
- *stabilize graded areas (pave roads, hydroseed open areas, etc.) as soon as practical*
- *limit vehicles speeds on unpaved surfaces to 10 mph*
- *cover trucks hauling dirt for cut and fill operations*

The County would place conditions on the grading permits for the project. Those conditions would require implementation of measures similar to those listed above.

### 2.6.4.2:

Facilities Mitigation Measures: *Development projects shall provide facilities, as appropriate, to promote use of alternative transportation methods, such as:*

- *bicycle storage facilities at industrial and commercial facilities and park-and-ride lots*
- *shuttle service between business and the transit stop.*

Bicycle storage facilities shall be provided on each industrial and commercial lot as specified in the design guidelines for the project. The need for park and ride facilities and/or shuttles and appropriate locations for such facilities shall be coordinated with County Staff, SANDAG and Metropolitan Transit Development Board (MTDB). The party responsible for implementing any identified, off-site park-and-ride lots would provide bike storage facilities and the effected agencies will determine appropriate shuttle stops. Implementation of the project does not foreclose opportunities for transit or shuttle stops to be implemented within public right-of-ways.

## Significant Environmental Effects – 2.0

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Transportation Mitigation Measures: *The County shall coordinate with other appropriate agencies (SANDAG, North County Transit District [sic]) to implement the following techniques to further reduce vehicle emissions:*

- provide funding support for transit improvements (i.e., bicycle lanes, additional bus service)*
- implement transportation control measures (tolls, parking fees, taxation policies, etc.)*
- implement commute travel reduction program such as employment rideshare program, transit pass subsidy to employers, flexible work hours, telecommuting programs, etc.*
- implement an ordinance to reduce truck deliveries and goods movements*
- require clean fuel vehicle fleets*
- expand transit services*
- retrofit transit buses to clean fuels or electrification*

The County has and continues to coordinate programs similar to those listed above. It should be noted that the transit provider is MTDB and not the North County Transit District.

### 2.6.5 Conclusions

The Initial Study for the proposed project determined that there was a potential need for re-analysis of air quality impacts due to the change in the project (extension of Otay Mesa Road). That modification would not affect the type of uses and number of vehicular trips that would be generated from the proposed project. Upon further review of the analyses provided in the Specific Plan EIR, the County has determined that additional air quality studies are not required because air emissions from the proposed modification would not change. The East Otay Mesa Specific Plan EIR identified the primary source of air pollutants as those that would be generated from vehicle trips associated with the proposed project. However, those emissions were not accounted for in the regional air quality process and are considered a significant direct impact. In addition, emissions from project-related trips together with the emissions from the other projects proposed within the Specific Plan area were considered a substantial increase over the existing ambient air quality in the project area, thus considered a cumulatively significant impact. Mitigation measures identified in the Specific Plan EIR would reduce the direct significant impacts to a level below significant, but the cumulative impacts would remain significant.

## CHAPTER 3.0 -CUMULATIVE IMPACTS

### 3.1 List of Past, Present, and Reasonably Anticipated Future Projects in the Project Area

The East Otay Mesa Specific Plan EIR (Section 7.0, CUMULATIVE IMPACTS) adequately addressed the project's relationship to past, present and future projects. Figure 3.1-1, *Other Proposed and Approved Projects in the Project Vicinity*, identifies the location of those projects that were analyzed in the previous EIR for cumulative impacts. The following table provides an update on each of those projects identified in the Specific Plan EIR.

**TABLE 3-1  
OTHER PROPOSED AND APPROVED PROJECTS IN THE PROJECT VICINITY**

Map Number	Project Name	Dominant Land Use	Jurisdiction	Status
1.	Otay Ranch	Residential	City/County of San Diego; City of Chula Vista	Under Construction
2.	Brown Field Master Plan Update/Exapnsion	Airport/Industrial/ Commercial	City of San Diego	The FEIR/project is targeted for City-certification/approval on June 2000.
3.	SR-125	Highway	State of California	Scheduled to Open Year 2002/2003
4.	Southwest San Diego County Landfill Sites	Landfill	County of San Diego	Permit Expired - No Development
5.	Southeast Otay Mesa Sludge Processing Facilities	Industrial	County of San Diego	Permit Expired - No Development
6.	SR-905	Highway	State of California	Scheduled to Open Year 2005
7.	Otay Valley Regional Park Focused Planning Area	Open Space/ Recreational	City/County of San Diego; City of Chula Vista	Property Being Acquired for Development.
8.	American International Raceway	Motor Sports	County of San Diego	Permit Expired - No Development
9.	Otay Mesa OHV Park	Motor Sports	County of San Diego	Permit Expired - No Development
10.	County Water Reclamation Plant	Industrial	County of San Diego	Permit Expired - No Development

## Cumulative Impacts - 3.0

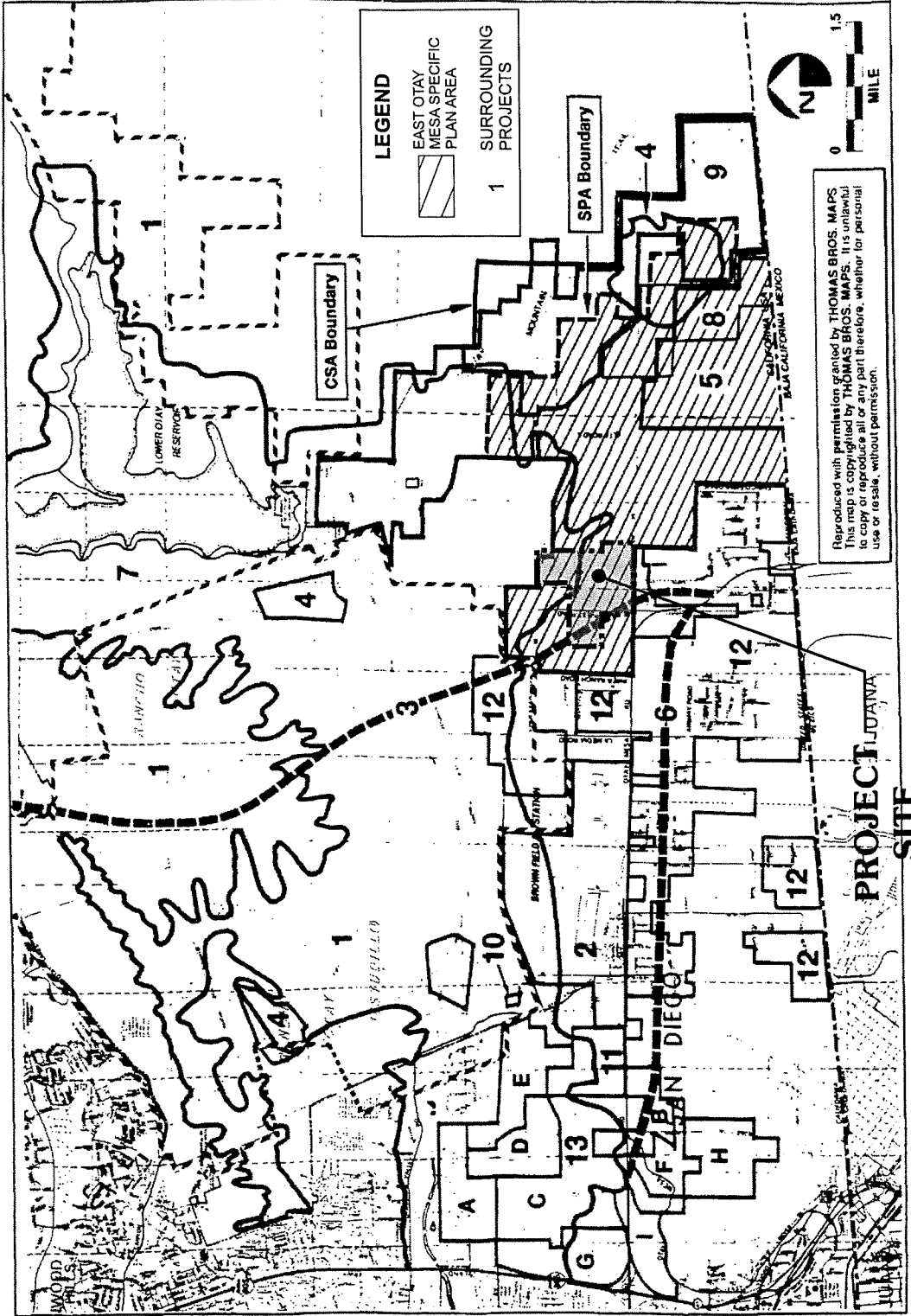
11.	Otay Corporate Center	Industrial	City of San Diego	Under Construction
12.	Various Industrial TM's	Industrial/Office	City of San Diego	Approved Maps and/or Under Construction
13.	Various Proposed Precise Plans			
	A. Dennery Ranch	Residential	City of San Diego	Under Construction
	B. Otay Vista	Residential	City of San Diego	Status Unknown
	C. California Terraces	Residential	City of San Diego	Under Construction
	D. Hidden Trails	Residential	City of San Diego	Application Under City-Review
	E. Robinhood Ridge	Residential	City of San Diego	Applicant Processing Map/Plans - No Development Has Occurred
	F. Santee Investments	Residential	City of San Diego	High School District has Completed Condemnation
	G. South Palm	Residential	City of San Diego	Project Was Approved - No Permits Have Been Issued
	H. Baja Vistas	Residential	City of San Diego	Status Unknown
	I. Remington Hills	Residential	City of San Diego	Under Construction

Since certification of the Specific Plan EIR, four additional projects have been applied for within the proposed project's vicinity. These projects include the Brown Field Airport Expansion, Travel Plaza Truck Stop, Otay Mesa Energy Plant, and the Truck Storage Facility.

The Brown Field Airport project would consist of expanding the runway east to the SR-125 for cargo plane use. The structures on-site would be torn down and replaced for cargo plane industry uses, and commercial uses would be developed along Otay Mesa Road. The Environmental Impact Report for this project has been finalized and responses to comments have been provided by the City of San Diego. The final EIR and proposed expansion project is targeted to go the City Council for certification and approval in June 2000.

An application has been submitted to the County for the 80-acre Travel Plaza Truck Stop project. The Travel Plaza would be located southeast of the proposed project and consist of fueling and maintenance areas, a motel, restaurant and mini-mart. The County is reviewing the project for CEQA compliance.





**Figure 3.1-1**  
**OTHER PROPOSED & APPROVED**  
**PROJECTS IN THE PROJECT VICINITY**



SOURCE: OGDEN

**SUNROAD CENTRUM SEIR**

Draft: June 29, 2000; Final: December 15, 2000

# Cumulative Impacts - 3.0

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The Otay Mesa Energy Plant would occur on 46-acres east of the project site. The plant would use natural gas to provide electricity. The County of San Diego has approved the project, and the project is being reviewed by the California Energy Commission.

The County has received an application for the Truck Stop Storage Facility and has deemed it complete. However, an Initial Study for potential environmental impacts has not been prepared.

## 3.2 Subject Area Cumulative Impact Analysis

The East Otay Mesa Specific Plan EIR (Section 7.0, CUMULATIVE IMPACTS) addressed several potentially significant cumulative impacts that would be associated with implementation of the proposed project. Some would be unavoidable and some would not. The following impacts were addressed in the previous EIR: 1) Land Use impacts, due to the unavoidable cumulative loss of open space areas; 2) Biological Resources impacts, due to the cumulative loss of habitats on-site; however, mitigation in the form of preservation of habitat within the Specific Plan area would maintain wildlife linkages reducing impacts to below significance; 3) Transportation and Circulation impacts, due to an overall increase in traffic volumes on the existing and future roadway network; 4) Noise impacts, due to the existing residences located along Otay Mesa Road and Otay Valley Road; 5) Air Quality impacts, due to the project's unavoidable contribution to regional air emissions; 6) Health and Safety impacts, due to proposed construction and operational activities that would increase the likelihood for accidental releases of hazardous materials; however, with implementation of mitigation measures during transport and delivery of such materials, the impacts would be reduced to below significant; and 7) Public Services impacts, due to the projects' demand on regional water supplies and solid waste disposal; however with the implementation of short-term and long-term mitigation in the form of "Best Management Practices" and water conservation measures as identified by the Metropolitan Water District and the County Water Authority, the cumulative impacts would be reduced to below significant.

In addition to the previously identified cumulative impacts, the Initial Study released with the N.O.P. on September 23, 1999, for public review identified an additional potential cumulative impact associated with Biological Resources, specifically the San Diego and Riverside fairy shrimp. Accordingly, the discussion below specifically addresses the cumulative impacts to the San Diego and Riverside fairy shrimp.

### 3.2.1 Existing Conditions

The proposed *SUNROAD CENTRUM* project site is undeveloped. The only existing development adjacent to the site is the industrial development to the south and west. The future SR-125, the proposed Brown Field Airport Expansion, and commercial industrial projects are located to the west. The project's northern boundary abuts Johnson Canyon, which will remain as open space. To the east is undeveloped land within the East Otay Mesa Specific Plan that is designated for industrial and residential uses.

Since certification of the Specific Plan EIR, the San Diego and Riverside fairy shrimp were listed as endangered species. Accordingly, the following discussion addresses the potential for cumulative impacts to the fairy shrimp species as a result of the proposed project and surrounding projects in the area, including those in Table 3-1.

The San Diego Fairy Shrimp was listed as an endangered species by the U.S. Fish and Wildlife Service on February 3, 1997. Fairy shrimp are considered sensitive due to their relationship with vernal pools, which are declining in southern California. The largest number of vernal pools inhabited by San Diego fairy shrimp are located in San Diego County, with smaller localities in Orange County and Baja California. The Riverside fairy shrimp is found in vernal pools in Riverside County and coastal sites in Orange County, with additional populations in San Diego County and two localities in Baja California.

According to information provided in Appendix B of this SEIR, approximately 50-100 vernal pools occur on Otay Mesa. Fairy shrimp are known to occur in those vernal pools, with the Riverside fairy shrimp occurring in the deeper pools. However, none of the available research sources (cited in Appendix B of the SEIR) identified which pools contain fairy shrimp. Accordingly, existing population estimates are difficult to determine because no extensive research has been conducted in this area and fairy shrimp numbers in any given year can fluctuate dramatically. Thus, potentially cumulative impacts to fairy shrimp are typically addressed through an evaluation of vernal pool loss and not population size. This approach is consistent with the approach used in the evaluation of both fairy shrimp species in the Vernal Pools of Southern California Recovery Plan (USFWS 1998) and the EIR prepared by the City of San Diego and U.S. Fish and Wildlife Service for implementation of the Multiple Species Conservation Program (MSCP).

The San Diego fairy shrimp was observed as cysts within all seven of the vernal pools on the project site as well as the small pond, north of the agricultural pond. Mature San Diego Fairy Shrimp were observed in the agricultural pond. Although, the Riverside fairy shrimp was not observed in either the vernal pool complex or the ponds, it was assumed that the species occupies these habitats.

### 3.2.2 Thresholds of Significance

Significance criteria used in this analysis are based on the MSCP, Biological Mitigation Ordinance (County 1998), and CEQA guidelines as well as guidelines provided in Nelson (1981). Thresholds that would specifically apply to the San Diego Fairy Shrimp would include:

- Impacts to federal or state-listed species or habitats; and
- Cumulative impacts occurring throughout the project area and from current land uses and proposed projects in the area.

## 3.2.3 Analysis of Project Effects and Determination as to Significance

Subsequent to the consideration and adoption of the East Otay Mesa Specific Plan and certification of the Specific Plan EIR, the San Diego and Riverside fairy shrimp were listed as endangered species. During the Initial Study process, a survey of the site determined that the San Diego Fairy Shrimp were present on the project site and the Riverside Fairy Shrimp had the potential to occur onsite, and development of the project site would have the potential to impact the species as the result of impacts to a small portion of isolated wetlands identified on the project site. Accordingly, a brief discussion of the direct and cumulative impacts associated with the San Diego and Riverside fairy shrimp is provided below.

**Direct Impacts:** Direct impacts to fairy shrimp associated with development of the proposed project would result from the loss of the agricultural pond (containing mature San Diego fairy shrimp) and the smaller pond (containing cysts of San Diego fairy shrimp) on-site. Although the Riverside fairy shrimp was not observed in either pond, it was assumed that this species also would be impacted as a result of development. The vernal pool complex (containing cysts of San Diego fairy shrimp) would be preserved on-site in the proposed open space easement, therefore, the fairy shrimp observed in these pools would not be impacted.

**Cumulative Impacts:** The San Diego fairy shrimp occur in ephemeral ponds and vernal pools on the project site; Riverside fairy shrimp are presumed to occur on-site. In order to evaluate the project's cumulative impacts to fairy shrimp, an evaluation of habitat (vernal pool) loss was used instead of species loss because there is little to no available data on the population of fairy shrimp in Otay Mesa. The EIR prepared for the Multiple Species Conservation Program (MSCP) (City of San Diego and U.S. Fish and Wildlife Service, 1996) used this method during the evaluation of potential impacts to the fairy shrimp populations as a result of implementation of the MSCP. In Section 4.3, BIOLOGICAL RESOURCES, of the MSCP EIR, the impact analysis focused on the percent of major populations that would be conserved within the MHPA. For those species with few documented occurrences in the study area (such as the San Diego and Riverside fairy shrimp), the percent of habitat conserved was used instead of size of population. The EIR states that the MSCP, including the South County Segment of the County of San Diego's Subarea Plan would conserve 24% of the vernal pool habitat for the San Diego and Riverside fairy shrimp populations. In addition, the MSCP EIR determined that 67% of the Riverside fairy shrimp population would be conserved; specific population data for the San Diego fairy shrimp was not available. The results of this analysis is based on the assumption that important fairy shrimp habitat would continue to be conserved on military/federally-owned property and that the populations would receive additional protection from federal wetland regulations (the U.S. Army Corps of Engineers permitting process).

Section 6.0, CUMULATIVE IMPACTS, of the MSCP EIR also evaluated the potential for cumulative impacts on MSCP-covered species from implementation of various conservation plans, including the County of San Diego Multiple Habitat Conservation and Open Space

## Cumulative Impacts – 3.0

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Program. The County's program encompasses the unincorporated areas of the County, including the *Sunroad Centrum* project site. The EIR states that the anticipated cumulative, direct impacts to covered-species associated with issuance of take permits pursuant to the MSCP would be reduced to a level below significance due to the MSCP's assembly and management of preserves in accordance with NCCP Conservation Guidelines. Because the proposed *Sunroad Centrum* project is in compliance with the MSCP and the MSCP EIR determined that both fairy shrimp species would be adequately conserved, there will be no cumulatively significant impacts associated with the project.

### 3.2.4 Mitigation Measures

The mitigation measures identified in Section 2.3, BIOLOGICAL RESOURCES, would reduce the cumulative impacts associated with the area losses of San Diego and Riverside fairy shrimp to a level below significant. Mitigation would require preservation of the vernal pool complex within the proposed open space preserve area on-site so that the fairy shrimp population identified in those pools would remain intact. In addition, enhancement/creation of wetland habitat adjacent to the vernal pool complex would be required to create additional suitable habitat for the fairy shrimp ~~that are currently located in the agricultural pond and the smaller pond located to the north of the agricultural pond. Prior to project approval, the species within those two ponds shall be relocated to the basins that would be created as part of the required wetland mitigation.~~

## CHAPTER 4.0 - PROJECT ALTERNATIVES

### 4.1 Rationale for Alternative Selection

#### **Previous Analysis of Alternatives**

The East Otay Mesa Specific Plan EIR analyzed the potential environmental impacts associated with the implementation of three alternatives. These alternatives included: the "No Project Alternative," the "Otay Subregional Plan Alternative," and the "Environmentally Preferred Alternative." The County determined that the previous EIR adequately addressed the alternatives as they relate to the proposed *SUNROAD CENTRUM* project.

#### **Alternative Considered But Rejected**

The plan evolution process for the proposed *SUNROAD CENTRUM* project included construction of the project as currently designed (consistent with the East Otay Mesa Specific Plan), including the proposed off-site connection to Otay Mesa Road, however, the entire project would be constructed all in one phase. That project was submitted to the County of San Diego for review in October 1999. That design was not carried forward because the proposed project would create cumulatively significant traffic impacts in the short-term that could not be mitigated. Accordingly, the proposed project-schedule was modified to propose a two-phase project that is consistent with the Specific Plan to partially mitigate the short-term cumulative traffic impacts.

#### **Additional Analysis**

Although a reasonable range of alternatives was provided in the Specific Plan EIR, it was determined that an additional alternative be analyzed that would lessen potential impacts associated with biological resources (specifically the recently-listed San Diego and Riverside fairy shrimp). The impacts associated with this alternative and the reasons for its rejection are provided below.

### 4.2 Analysis of the "Alternative Road Alignment" Alternative

#### **4.2.1 Alternative Road Alignment Alternative Description and Setting**

As discussed in Section 2.5, BIOLOGICAL RESOURCES, the proposed *SUNROAD CENTRUM* project would create potential indirect impacts to the vernal pool habitat (San Diego and Riverside fairy shrimp habitat) due to habitat fragmentation. Although, vernal pool fragmentation was analyzed under the previous Specific Plan EIR, the potential impacts to the San Diego and Riverside fairy shrimp were not analyzed because the species were not considered a species of concern during the original analysis. During a project scoping meeting between County-staff and Army Corps of Engineers-staff, it was suggested that the proposed alignment of Lone Star Road be moved southward to reduce potential impacts associated with fragmenting the vernal pool complex and its watershed. There was concern

that fragmentation would impact the hydrology of the watershed, thus impacting the northern vernal pools' ability to share biological resources with the vernal pool to the south (thus potentially disrupting the fairy shrimp population). Accordingly, the "Alternative Road Alignment" alternative (see Figure 4.2-1, *Alternative Road Alignment for Lone Star Road*) was designed to address this potential impact.

The "Alternative Road Alignment" alternative would consist of the same uses as being proposed in the proposed *SUNROAD CENTRUM* project, however, there would be less acres developed for industrial/commercial uses and more acres would be set aside for the proposed open space preserve. As a result of moving Lone Star Road south of the isolated vernal pool, 158.6 acres of the 250.5-acre project site would be developed for industrial/commercial uses, south of Lone Star Road. In addition, an Remainder Parcel open space easement would be created north of Lone Star Road, consisting of ~~49.61~~ 57.6 acres (including all seven vernal pools), ~~which would be placed in an open space easement and an 8.0-acre Potential Future Development area.~~ The remaining 34 acres would be developed for streets. The new alignment of Lone Star Road would be constructed two to three hundred feet south of its current proposed location and Street "A" would terminate as cul-de-sac and would no longer connect to Sanyo Avenue.

This alternative would meet the objectives of the proposed *SUNROAD CENTRUM* project by implementing the Otay Mesa Specific Plan through the provision of commercial/industrial uses that would create job opportunities, accommodate forecasted growth, protect open space and contribute to the development of infrastructure, streets and a circulation system that would accommodate forecasted public utility and service needs and traffic growth. The alternative also would meet the second objective of the proposed project by implementing the County's MSCP by providing for a minor amendment to the subregional plan that would permanently preserve wetlands/vernal pools and sensitive biological habitat.

### **4.2.2 Comparison of the Effects of the Alternative Road Alignment Alternative to the Project**

The "Alternative Road Alignment" alternative was included as a result in the change in circumstances (namely the impacts associated with the recently-listed fairy shrimp) since the adoption of the East Otay Mesa Specific Plan EIR, therefore, only those environmental impacts associated with, Biological Resources, were analyzed for this alternative.

#### **Biological Resources:**

The alignment of Lone Star Road would still impact the sensitive vegetation communities and plant and animal species on-site. Impacts would be reduced as compared to the proposed project, but not to a level below significant. On-site impacts would include the loss of ~~12.14~~ 1.5 acres of coastal sage scrub ~~/non-native grassland mix,~~ 3.0 acres of native grassland, ~~205.61~~ 181.3 acres of non-native grassland, 0.20 acre of southern willow scrub, and 0.11 acre

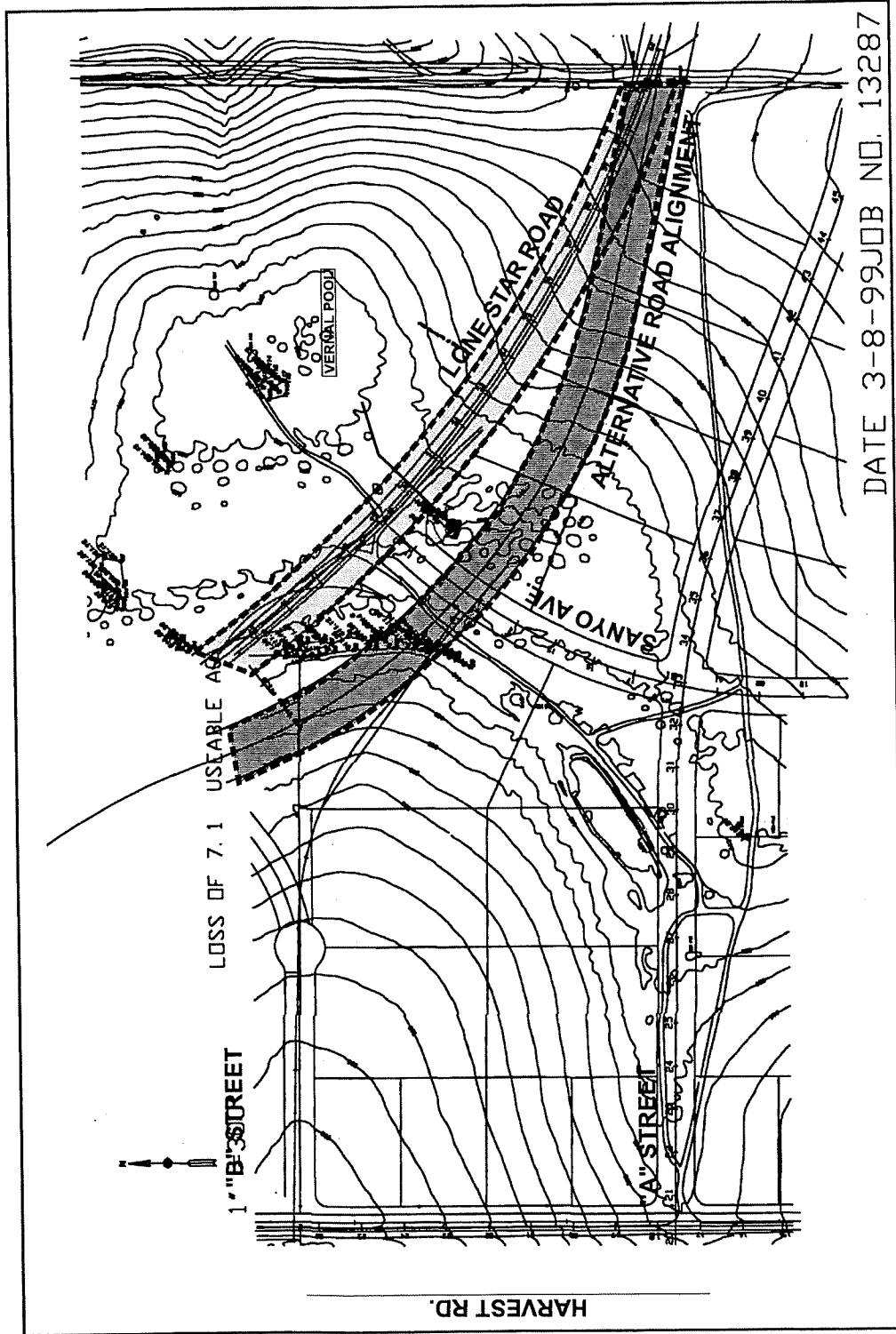


Figure 4.2-1  
 ALTERNATIVE ROAD ALIGNMENT  
 FOR LONE STAR ROAD



of disturbed wetland waters. The off-site impacts to 0.13 acre on non-native grasslands would still occur under this alternative. All of these impacts would be mitigated to the same ratios required under the proposed project, via preservation and enhancement/re-creation of habitat on-site and the acquisition and preservation of habitat off-site. Indirect impacts associated with habitat fragmentation within the vernal pool complex would be avoided under this alternative due to the absence of impediments from infrastructure. Impacts to the four sensitive plant species and five sensitive animal species would still occur and would require the same mitigation as being proposed under the *SUNROAD CENTRUM* project. Additionally, all of the indirect impacts associated with human activities, construction activities, the introduction of non-native and invasive plant species, increased runoff/erosion/sedimentation, and contamination from toxic material spills would still occur under this alternative and would require the same mitigation under the proposed project.

### 4.2.3 Applicant's Rationale for Rejection of the Alternative Road Alignment Alternative

The Alternative Road Alignment alternative was rejected for the following reasons:

- The alternative would be inconsistent with the East Otay Mesa Specific Plan and would require an amendment to the Specific Plan to allow for the realignment of the Lone Star Road. The proposed *SUNROAD CENTRUM* project, on the other hand, would be consistent with the Specific Plan and would not require the additional analyses required for a Specific Plan amendment. Accordingly, this alternative would increase the Land Use impacts associated with the proposed project.
- The proposed alignment of Lone Star Road under the *SUNROAD CENTRUM* project was previously analyzed for biological resource impacts in the East Otay Mesa Specific Plan EIR. During the analysis, County-staff and consultant biologists reviewed the alignment of the road and its potential indirect habitat fragmentation impacts (due to potential hydrological changes) to the vernal pools. In addition, the mitigation measures being proposed in Section 2.3 of this SEIR would reduce the potential impacts to below significant by including the isolated vernal pool as a part of the mitigation program for the vernal pool complex to the north of Lone Star Road.
- The adopted Lone Star alignment meets County Standards for road design and safety. In addition, the proposed road alignment would cause the least impact to on-site sensitive biological resources. The Alternative Road Alignment alternative would require extensive engineering and analysis to ensure that the new alignment would include acceptable vertical and horizontal radii. In addition, additional biological surveys would be required to determine the additional impacts to off-site biological resources; including, sensitive vegetation habitats (including wetlands) and wildlife and plant species.

## Project Alternatives - 4.0

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- A change in the alignment of Lone Star Road would effect up to six property owners, and possibly Caltrans' infrastructure plans for the subject area. Property owners within and outside the Specific Plan area would need to be advised of the proposed modification and be provided ample opportunity to participate in the modification process.
- The alignment proposed under this alternative would require Street "A" to be constructed as a cul-de-sac, thus eliminating an efficient connection to Sanyo Avenue and Lone Star Road for some of the planned uses west of Sanyo Avenue. In addition, access to some of the proposed industrial/commercial lots may be eliminated under this alternative. This modification in the adopted circulation pattern would require a Specific Plan amendment.
- This alternative would reduce the amount of land available for industrial/commercial uses. Thus, the primary goal of the East Otay Mesa Specific Plan of encouraging job-creation opportunities and commercial development in the area would not be maximized.
- The loss of industrial/commercial lots under this alternative would also result in an indirect effect on the County, due to loss of sales and property tax revenues.

# Long-Term Environmental Effects - 5.0

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## CHAPTER 5.0 - LONG-TERM ENVIRONMENTAL EFFECTS

### 5.1 Growth Inducing Impacts

The California Environmental Quality Act guidelines require that EIRs include a discussion of how the proposed project could either directly or indirectly foster growth. Projects which would remove obstacles to population growth should also be included in this discussion. Additionally, the characteristics of the proposed project which may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively, are considered. The proposed project was previously analyzed for growth-inducing impacts in the East Otay Mesa Specific Plan EIR. Therefore, this SEIR would only evaluate the potential for growth-inducing impacts from the change in circumstances (the SR-905 connection from Otay Mesa Road).

In the case of the *SUNROAD CENTRUM* project, additional infrastructure such as the SR-905 connection would have to be extended into the area to accommodate future development as planned. Because the availability of infrastructure is a critical factor in future development opportunities for *SUNROAD CENTRUM*, the extension of infrastructure would make this site more accessible to development and encourage future growth on the project site itself (this is the objective of the project).

As discussed in Section 2.5, TRANSPORTATION/CIRCULATION, ~~pursuant to a reimbursement agreement with the County, the applicant would construct be required to implement one of the three improvement options for and off-site segment of the proposed off-site half-width improvements to Old Otay Mesa Road between Harvest Road and Otay Mesa Road (905), pursuant to the project's Tentative Map Conditions. The applicant will be reimbursed by the County for those costs that exceed the project's fair share contribution.~~ This off-site improvement would mitigate the cumulatively significant impacts associated with traffic on a segment of Otay Mesa Road during Phase I of the proposed project to a level below significant. The County's Circulation Element within the East Otay Mesa Specific Plan accounted for the improvements to Old Otay Mesa Road. Accordingly, the extension of infrastructure into the project area is not considered growth inducing because it is included in the Specific Plan.

~~In addition, the *SUNROAD CENTRUM* project is located on the very edge of the developable land within the County. Only the area outside of the project area but within the County Service Area (CSA) represents a possible area where growth could be induced. However, growth in this area is severely constrained by its steep topography and inaccessibility. In addition, most of the area east of the CSA is owned by the federal government and managed by the U.S. Department of Interior's Bureau of Land Management (BLM). Few areas are left in the vicinity of the *SUNROAD CENTRUM* project where additional growth could occur.~~

~~The *SUNROAD CENTRUM* project would create a large number of jobs, which in turn can generate a need for housing. However, since the project is consistent with the County's General Plan and its~~

## Long-Term Environmental Effects - 5.0

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~~Otay Subregional Plan, the additional employment and housing demand has been included in the most regional growth forecasts. In addition, many new housing developments are located or are planned in the cities of San Diego and Chula Vista and these would provide enough housing to meet the demand created by the project.~~

~~Since there is little developable land left in the East Otay Mesa area, and because new housing developments are already proposed or planned that would meet any housing demand generated by the project, the proposed SR-905 connection as proposed under the *SUNROAD CENTRUM* project is not considered to be significantly growth inducing.~~

### 5.2 Significant Irreversible Environmental Changes Resultant From Project Implementation

The proposed *SUNROAD CENTRUM* project would require an analysis of the significant irreversible environmental changes associated with the approval of the proposed Minor Amendment to the MSCP Subregional Plan (as described in Section 2.1, *Land Use*, of this SEIR). Accordingly, the County must determine if any of the following must be disclosed:

- *Any irreversible environmental changes which would be involved in the proposed action, should it be implemented.*
- *Any uses of non-renewable resources or limitations on future uses of non-renewable resources if the proposed project is implemented (example: placement of a residential land use designation in an area of a known mineral resource). Irretrievable commitments of resources must be evaluated to ensure that the project's consumption is justified.*
- *Any primary and secondary impacts that commit future generations to similar uses.*

The approval of the proposed MSCP Amendment would allow for the proposed preservation, re-creation and enhancement of habitat within the Major Amendment area of the Subarea Plan and the acquisition and preservation of habitat off-site as permanent open space. On the other hand, the amendment also would allow the portions of the Minor Amendment area to be developed with industrial/commercial uses as proposed and the on-site habitat would be partially eliminated. This change would represent an irreversible environmental change to the area as a result of project implementation. However, the project would mitigate this irreversible effect through the on- and off-site enhancement/creation of wetlands, and on-site preservation of upland habitat, and the off-site acquisition of upland habitat at the mitigation ratios specified in Section 2.3, BIOLOGICAL RESOURCES, of this SEIR.

Approval of the MSCP Amendment would allow for the construction of several industrial and commercial buildings and the associated infrastructure to serve the development within the Minor Amendment area. Some non-renewable resources would be used over time during the build-out of

# Long-Term Environmental Effects - 5.0

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the project area. However, this would not be considered a significant irreversible commitment of resources.

Approval of the MSCP Amendment would not create primary or secondary impacts that would commit future generations to similar uses as being proposed under the amendment because the proposed open space preserve area will be located adjacent to an existing permanent open space preserve area to the north and the proposed industrial/commercial uses will be surrounded by existing and planned land uses under the East Otay Mesa Specific Plan.

## 5.3 Conclusions

The proposed project would not create growth inducing impacts as a result of infrastructure improvements or job creation. Both were accounted for in the County's Specific Plan for East Otay Mesa. In addition, the proposed project would not create irreversible environmental changes as a result of the proposed Minor Amendment to the MSCP Subregional Plan.

# **Environmental Effects Found Not To Be Significant – 6.0**

## **CHAPTER 6.0 - ENVIRONMENTAL EFFECTS FOUND NOT TO BE SIGNIFICANT**

### **6.1 Effects Found Not to be Significant as Part of the SEIR Process**

The Notice of Preparation (dated September 23, 1999) for the *SUNROAD CENTRUM* project identified additional, potentially significant impacts associated with LAND USE, NOISE, BIOLOGICAL RESOURCES, CULTURAL RESOURCES, TRANSPORTATION/CIRCULATION, and AIR QUALITY. After further analysis of these issue areas in the *SUNROAD CENTRUM* SEIR (provided in Section 2.1, LAND USE, Section 2.2, NOISE, Section 2.3, BIOLOGICAL RESOURCES, Section 2.4, CULTURAL RESOURCES, Section 2.5, TRANSPORTATION/CIRCULATION, and Section 2.6, AIR QUALITY), the County determined that the proposed project would create additional significant impacts to all of the issue areas, except for NOISE and AIR QUALITY. The proposed modification (the extension of Otay Mesa Road to SR-905) would not affect the type of uses and number of vehicular trips that would be generated from the proposed project, therefore, the air emissions calculated in the Specific Plan EIR for the proposed project would not change.

### **6.2 Effects Found Not to be Significant During Initial Study**

The East Otay Mesa Specific Plan EIR determined that the various projects (including the proposed project) would not create significant impacts to: Geologic Resources, Population and Housing, Water Resources, Public Services, Utilities and Services, Hazards, and Aesthetics. During the initial study for the proposed *SUNROAD CENTRUM* project, the County determined that the change in circumstances would not create significant impacts to these issue areas.

### LIST OF REFERENCES

Air in San Diego County, 1996 Annual Report, Air Pollution Control District, San Diego County

Bay Area Air Quality Management District - Assessing the Air Quality Impacts of Projects and Plans, April 1996

California Environmental Quality Act, CEQA Guidelines 1997

California State Clean Air Act of 1988

Circulation Element of the San Diego County General Plan, Part III, Chapter 1

Conservation Element of the San Diego County General Plan, Part X, Chapter 5, Unique Geological Features, and Appendix G

County of San Diego Code Zoning and Land Use Regulation Division Sections 88.101, 88.102, and 88.103

County of San Diego Code Zoning and Land Use Regulation, Division 7, Excavation and Grading

County of San Diego Groundwater Ordinance (Chapter 7, Sections 67.701 through 67.750)

County of San Diego Noise Element of the General Plan (especially Policy 4b, Pages VIII-18 and VIII-19)

County of San Diego Noise Ordinance (Chapter 4, Sections 36.401 through 36.437)

County of San Diego Zoning Ordinance (Performance Standards, Sections 6300 through 6314, Section 6330-6340)

Cultural Resources Survey and Test Report for the Otay Mesa Road Widening Project, Gallegos & Associates, June 1996

Dam Safety Act, California Emergency Services Act; Chapter 7 of Division 1 of Title 2 of the Government Code

East Otay Mesa Specific Plan, County of San Diego, July 1994

East Otay Mesa Specific Plan Final Environmental Impact Report, County of San Diego, April 15, 1994

## **List of References**

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- General Construction Storm Water Permit, State Water Resources Control Board
- General Dewatering Permit, San Diego Regional Water Quality Control Board
- General Impact Industrial Use Regulations (M54), San Diego Regional Water Quality Control Board
- Groundwater Quality Objectives, San Diego Regional Water Quality Control Board's Basin Plan
- Health and Safety Code (Chapters 6.5 through 6.95), California Codes of Regulations Title 19, 22, and 23, and San Diego County Ordinance (Chapters 8, 9, and 10)
- Housing Element of the San Diego County General Plan, Part IX, 1991-1999, Policy 8, Preserving and Increasing Housing Supply
- Letter Report Regarding Sunroad Centrum Cultural Resources, Gallegos & Associates, February 8, 1999
- Resource Protection Ordinance of San Diego County, Articles I-VI inclusive, October 10, 1993
- San Diego County Soil Survey, San Diego Area, United States Department of Agriculture, December 1973
- Special Publication 42, Fault Rupture Hazard Zones in California, Alquist-Priolo Special Studies Zones Act, Title 14, Revised 1994
- Sunroad Centrum Biological Technical Report, REC Consultants, Inc., June 2000
- Suroad Centrum Resource Conservation Plan, REC Consultants, Inc., June 2000
- Traffic Noise Study, Sunroad Centrum Project, Giroux & Associates, May 23, 2000
- Traffic Study for Sunroad Centrum, Darnell & Associates, Inc., March 19, 2000
- U.S. Federal Clean Air Act of 1990
- Updated Geotechnical Investigation, Sunroad Centrum, Otay Mesa and Harvest Roads, GEOCON Incorporated, February 1999.
- Update of Mineral Land Classification: Aggregate Materials in the Western San Diego County Production-Consumption Region, 1996, Department of Conservation, Divisions of Mines and Geology



# **List of SEIR Preparers and Persons and Organizations Contacted**

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## **LIST OF SEIR PREPARERS AND PERSONS AND ORGANIZATIONS CONTACTED**

### COUNTY OF SAN DIEGO

Bill Stocks - Project Planner  
John Petersen - CEQA Regulatory Manager  
Maggie Loy - Environmental Analyst

### T & B PLANNING CONSULTANTS, INC. - Environmental Analysis and Report Preparation

James Greco - Principal  
Tracy Zinn - Senior Project Planner  
Christina File - Project Planner  
Andrew Lo Russo - Graphics Designer

### TECHNICAL APPENDICES PREPARERS:

Appendix B - Biological Technical Report, Resource Conservation Plan & BRCA Findings

REC CONSULTANTS, INC.  
Elyssa Robertson  
Daniell Flynn

Appendix C - Traffic Noise Study

GIROUX AND ASSOCIATES  
Hans Giroux

Appendix D - Letter Report on Cultural Resources

GALLEGOS AND ASSOCIATES  
Dennis Gallegos

Appendix E - Traffic Study

DARNELL AND ASSOCIATES, INC.  
Bill Darnell

### ORGANIZATIONS CONSULTED

RICK ENGINEERING COMPANY - Engineering  
Steve McPartland  
City of San Diego - Land Development Review (Southern Area)  
Anne Longworth

# **List of Persons, Organizations, and Public Agencies that Commented on the Draft Environmental Impact Report**

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## **LIST OF PERSONS, ORGANIZATIONS, AND PUBLIC AGENCIES THAT COMMENTED ON THE DRAFT ENVIRONMENTAL IMPACT REPORT (EIR)**

A draft version of this SEIR was circulated for public review from June 29, 2000 to August 16, 2000. The following is a listing of the names and addresses of persons, organizations, and public agencies that commented during this public review period.

<b>NAME</b>	<b>ADDRESS</b>
<b><u>U.S. Fish and Wildlife Service</u></b> Carlsbad Fish and Wildlife Office Nancy Gilbert, <i>Acting Assistant Field Supervisor</i>	2730 Loker Avenue, West Carlsbad, CA 92008
<b><u>California Department of Fish and Game</u></b> William E. Tippetts, <i>Supervisor, Habitat Conservation Planning</i>	4949 Viewridge Avenue San Diego, CA 92123
<b><u>State of California, Department of Transportation, District 11</u></b> Bill Figge, <i>Chief Development Review and Public Transportation Branch</i>	P.O. Box 85406, M.S. 50 San Diego, CA 92186-5406
<b><u>State of California, Department of Transportation, Aeronautics Program</u></b> Sandy Hesnard, <i>Environmental Planner</i>	1120 N. Street - Room 3300 P.O. Box 942874 Sacramento, CA 94274-0001
<b><u>San Diego Local Agency Formation Commission (LAFCO)</u></b> Joe Convery, <i>Local Governmental Analyst</i>	1600 Pacific Highway, Room 452 San Diego, CA 92101
<b><u>Endangered Habitats League</u></b> Dan Silver, <i>Coordinator</i>	PMB 592 8424-A Santa Monica Boulevard Los Angeles, CA 90069-4267

LETTER OF COMMENT

**ENDANGERED HABITATS LEAGUE**

*Dedicated to Ecosystem Protection and Improved Land Use Planning*

Dan Silver • Coordinator  
PMB 592  
8424-A Santa Monica Blvd.  
Los Angeles, CA 90069-4767  
TEL 323-654-1455 • FAX 323-654-1931 • [dasilver@evo.com](mailto:dasilver@evo.com)

**R E C E I V E D**  
JUL 25 2000

San Diego County  
DEPT. OF PLANNING & LAND USE



July 24, 2000

A

Maggie Loy  
Dept. of Planning and Land Use  
5701 Ruffin Rd., Suite B  
San Diego, CA 92123

RE: Draft Supplemental EIR, Sunroad Centrum (TM 5139RPL, Log No. 98-19-013)

Dear Ms. Loy:

The Endangered Habitats League (EHL) appreciates the opportunity to comment on the above-referenced document. EHL is a Southern California organization dedicated to ecosystem protection, improved land use planning, and collaborative conflict resolution.

In a letter of Sept. 27, 1999, EHL expressed concern over a project-by-project approach to East Oroy Mesa *in situ* the MSCP. We again urge that a comprehensive amendment process be undertaken. Given this situation, it would be helpful to the reader if the DSEIR contained an improved description, including maps, of how the proposed project relates to MSCP planning in the South County. For example, it is unclear how raptor foraging habitat (poorly protected by the proposed project) will be incorporated into the ultimate preserve.

Some of the MSCP findings are conclusory. For example, MSCP Finding of Fact #9 states, "The project proposes a *site* conservation which will preserve any potential or likely corridors and the best quality habitats on site such that it could be included within a sound preserve system." Again, it is unclear exactly how this proposed project fits into MSCP preserve design.

Also, the important, initial step of BRCA determination is flawed. The site is arbitrarily divided into BRCA and non-BRCA, which is illogical given that it is all part of the same large habitat block. It is relevant that the entire site supports several sensitive raptor species (harris, kite, ferruginous hawk), that the entire site was apparently mapped "very high" in the MSCP ranking, and that the soil is clay. Not surprisingly, native grasses have a significant presence. Thus, it is clear that the former agricultural land is an integral part of the ecosystem. Revised analysis should acknowledge the whole, contiguous parcel as BRCA. In general, it seems that the vast majority of parcels will either be BRCA or non-BRCA in their entirety.

Thank you for considering our comments and for your continuing work on the MSCP.

Sincerely,

Dan Silver,  
Coordinator

A1

The County of San Diego does not concur with this comment. Figure 1.3-2 on Page 1-9 of the SEIR includes a County-generated map of the MSCP with the property boundaries overlain on that map. Any other mapping would be less reliable. The description of the proposed project's relationship to the Minor Amendment Area of the MSCP is provided on Pages 1-5 and 2-17 of the SEIR. Based on comments received from the wildlife agencies (see Response Letter C), the proposed land use designations on the Tentative Tract Map have been revised to include the 8.0-acre Potential Future Development Parcel north of Lone Star Road as a part of the Remainder Parcel, all of which will be preserved as open space in perpetuity (see Figure 1.3-1 of the SEIR).

A2

The County does not concur that the entire project site should be designated as BRCA. The area designated as BRCA in Appendix B of the SEIR was delineated in coordination with County staff and the project's biologist (REC Consultants, Inc.). The BRCA limits as depicted in Appendix B are accurate and consistent with the BMO. Although the land is part of a larger block of undeveloped land, that land has been extensively disturbed in the past by agricultural uses. Item V of the BRCA Determination Conditions of the BMO states that: *The land consists of or is within a block of habitat greater than 500 acres in area of diverse and undisturbed habitat that contributes to the conservation of sensitive species.* The land outside the proposed BRCA, as depicted in Appendix B, has been extensively disturbed and is not diverse in its floral or fauna component. The area within the proposed BRCA has distinct soils, supports sensitive species, contains native habitats, is part of a regional linkage, and will continue to add to the biological diversity of species onsite. MSCP Finding No. 9 has been expanded to further discuss this comment.

RESPONSE



San Diego Local Agency Formation Commission

1600 Pacific Highway • Room 452  
San Diego, CA 92101 • (619) 531-5400  
Website: www.sdlafco.com

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SAN DIEGO COUNTY  
DEPT. OF PLANNING & LAND USE

B

**Chairwoman**  
Julianne Nygaard  
Councilmember,  
City of Carlsbad

**Vice Chairman**  
Andrew L. Vandelan  
Public Member

**Members**  
Bill Horn  
County Board of  
Supervisors

Dianne Jacob  
County Board of  
Supervisors

Patry Davis  
Councilmember,  
City of Chula Vista

Harry Mathis  
Councilmember,  
City of San Diego

Ronald W. Woodson  
Vice Fire Protection District  
District Member  
(vacant)

**Alternate Members**

Greg Cox  
County Board of  
Supervisors

Mary Teresa Sessom  
Mayor,  
City of Lemon Grove

Juan Vargas  
Councilmember,  
City of San Diego

Bud Pookington  
South Bay Irrigation District

Gay W. Winton III  
Public Member

**Executive Officer**  
Michael D. Ott

**Counsel**  
John J. Sansone

July 10, 2000

**TO:** Maggie Loy, Environmental Management Specialist (0650)  
Department of Planning and Land Use

**FROM:** Joe Convery, Local Governmental Analyst (A216)  
Local Agency Formation Commission

**SUBJECT:** Notice of Availability of a Draft Supplemental Environmental  
Impact Report - TM 5139 RPL, Log No. 98-19-013; Sunroad  
Centrum; Schedule No. 92101099

Thank you for the opportunity to review the above reference Draft  
Supplemental Environmental Impact Report (SEIR). We offer the  
following comment:

In our response to the Notice of Preparation for this project, we indicated  
that the SEIR should address the manner in which fire protection and  
emergency medical services will be provided to the area outside the Rural  
Fire Protection District's boundaries. Because this service information has  
not been included in the SEIR, if LAFCO is required to process a  
government jurisdictional change (e.g., annexation, out-of-agency service  
agreement, etc.), we will not be able to use this SEIR. Additional  
environmental review will be required. If you have any questions, please  
contact me at (619) 531-5400.

Sincerely,

*Joe Convery*  
JOE CONVERVY  
Local Governmental Analyst

JC:tm

B1

Comment noted. The project applicant has entered into an agreement with the San  
Diego Rural Fire Protection District (the District). The agreement requires the  
District to provide services to the entire project site and submit an application to  
LAFCO for the annexation into the District the approximately 30 acres that are  
currently outside the District's boundaries. The Notice of Preparation, Initial Study,  
and advertizement for the availability of the SEIR clearly states that the annexation  
is a part of the project. The draft SEIR accidentally omitted LAFCO as a responsible  
agency. The SEIR has been revised accordingly and the document should be  
adequate for LAFCO use.

B1

LETTER OF COMMENT



U.S. Fish and Wildlife Service  
Carlsbad Fish and Wildlife Office  
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Carlsbad, CA 92008  
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FAX (760) 431-9624



California Department of  
Fish and Game  
4949 Viewridge Avenue  
San Diego, CA 92123  
(858) 467-4201  
FAX (858) 467-4299

C

Ms. Maggie Loy  
San Diego County  
Department of Planning and Land Use  
5201 Ruffin Road, Suite B  
San Diego, California 92123

AUG 1 1 2000

Re: Supplemental Environmental Impact Report (SEIR) for the Sunroad Centrum Project in the  
East Otay Mesa Specific Planning Area.

Dear Ms. Loy:

The U. S. Fish and Wildlife Service (Service) and the California Department of Fish and Game (Department), hereafter collectively referred to as the Wildlife Agencies, have reviewed the Supplemental Environmental Impact Report (SEIR) and accompanying appendices for the Sunroad Centrum commercial development project, dated June 29, 2000. The 250.5-acre project site is located north of Otay Mesa Road and east of Harvest Road within the East Otay Mesa Specific Planning Area of San Diego County. The project site lies within the South County Segment of the County's Multiple Species Conservation Program (MSCP) Subarea Plan. Portions of the proposed project site are included as both major and minor amendment areas of the MSCP Multiple Habitat Planning Area (MRPA) boundary in the County's MSCP Subarea Plan. Additionally, the County has placed a "G" designator over a portion of the site (hills/residential area) that includes the I-22 vernal pool complex, which indicates that there are sensitive biological resources on the site.

As described in the Biological Technical Report (BTRC, June 2000: Biology Report), the vegetation on the project site consists of non-native grassland (216.74 acres, including 0.13 acre offsite impact), disturbed coastal sage scrub/native grassland (27.5 acres), southern willow scrub (0.55 acre), and disturbed wetlands/waters (0.31 acre, see below). Disturbed/developed areas occupy approximately 5.89 acres of the site. The I-22 vernal pool complex (as identified by F. Bauder in 1986) occurs onsite. According to the Biology Report, vernal pools occupy approximately 0.21 acre within the "basal sage scrub general habitat." Species designated as narrow endemic endangered County's MSCP Subarea Plan that are known to occur onsite include the federally-listed endangered San Diego fairy shrimp (*Branchinecta sandiegonensis*), the state- and federally-listed endangered San Diego burton-celery (*Ptyngium aristatum* var. *parvifolium*), and the variegated dudleya (*Dudleya variegata*). Although not observed onsite, the federally-listed endangered Riverside fairy shrimp (*Streptocephalus woottoni*), an MSCP narrow endemic species, is assumed to be present in suitable onsite habitat. Other MSCP covered species known to occur onsite include coast barrel cactus (*Ferocactus wislizeni*), and two species of raptors (also considered species of special concern by the Department), the northern harrier (*Circus cyaneus*), and the ferruginous hawk (*Buteo regalis*).

Ms. Maggie Loy

2

The black-shouldered kite is also known from the site. Although not covered under MSCP, it is also considered a species of special concern and a fully-protected species by the Department.

As described in the SEIR, the proposed project, which consists of approximately 250.5 acres within the larger 3,300-acre East Olay Mesa Specific Plan area, would be developed in two phases. The first phase consists of development of 76 industrial lots on approximately 130 acres. Phase two would consist of development of 22 commercial lots on 34.4 acres west of Harvest Road. The remainder of the project site would be included in a 51.3-acre remainder parcel consisting of a 43.24-acre biological open space area and an 8.0-acre future development area. The remaining 43.24-acre open space would encompass the majority of the onsite vernal pool complex. One of the seven vernal pools (the southernmost pool) would be isolated by construction of Lone Star Road through the project site. All direct impacts to all naturally-occurring vernal pools onsite will be avoided.

The Wildlife Agencies have provided comments on this project in a letter dated October 21, 1999 (attached), and during meetings with the project applicant and the County. We have made recommendations to design the project to reduce impacts to onsite biological resources and to ensure consistency with the County's Multiple Species Conservation Program (MSCP) Subarea Plan and Biological Mitigation Ordinance (BMO). We continue to be concerned with the following issues, including: 1) the adequacy of onsite vegetation mapping, especially with regard to native grassland; 2) the need to adequately quantify impacts to narrow endemic species (in particular, variegated dudleys) and provide mitigation for proposed impacts in accordance with the County's BMO; 3) the need to develop suitable mitigation for direct and indirect impacts to wetlands; 4) the need to process major and minor amendments for portions of the project; and 5) to adequately address Quino checkerspot butterfly (*Gymnophrys editha quino*) prior to ground-disturbing activities. We have the following comments regarding these issues:

**Vegetation Mapping**  
All maps in the biological sections of the SEIR should follow the County of San Diego Biological Mapping Requirement. These guidelines provide details of what should be and what should not be included for all maps depicting biological resources. The maps in the Biology Report and Resource Conservation Plan (RCP) do not comply with these guidelines. The maps are too cluttered or lack the information necessary for accurate interpretation of what they represent. Some of the maps have specific errors that make interpretation difficult. The Wildlife Agencies recommend the final SEIR include new maps that follow the County's Biological Mapping Requirements.

Additionally, the Wildlife Agencies have made several requests, both in the October 1999 letter and during meetings, that the vegetation on the project site be redesignated to accurately represent both the native grassland and coastal sage scrub (CSS). This has not occurred. During a May 18, 1999, meeting between the Wildlife Agencies, the County, and the applicant, the County proposed combining the onsite CSS and native grassland vegetation types (because the two vegetation types occur in a mosaic onsite) for the purposes of determining the appropriate mitigation ratio required by the County's BMO. The proposed mitigation ratio was a combination of Tier I (native grassland) and Tier II (CSS) habitat types resulting in a replacement ratio of 1.75:1. This proposal was taken into consideration by the Wildlife Agencies but was never agreed to because we were not convinced

C1

The County concurs that the biology mapping provided in the Draft SEIR should be revised to follow the County's Biological Mapping Requirements. Consequently, a more recent survey of the on-site vegetation was conducted on September 6, 2000 by County staff and the project's biologist (REC Consultants, Inc.). Accordingly, the biology mapping included in the Biological Technical Report and the Resource Conservation Plan (see Appendix B of the SEIR) has been revised. In addition, Figure 2.3-1 on Page 2-19 of the SEIR has been replaced with a new Figure 2.3-1 that reflects the mapping in Appendix B. The additional mapping information does not make an important change to the project description or impact discussion in the SEIR.

C2

See Response No. C.1. Table 2.3-3 in Section 2.0 of the SEIR has been revised to reflect the results of the recent vegetation survey. Based on the results of that survey the County concurs that the vegetation communities should be redesignated. Accordingly, the native grassland on-site has been identified as a separate vegetation community and the size of both the coastal sage scrub and non-native grassland habitats have been redefined. Consequently, the project's impacts to each of these vegetation communities and associated off-site mitigation requirements (see Section 2.3.4 of the SEIR) have been redefined. This revision in mitigation requirements does not make an important change to the SEIR because the project's impacts would still be mitigated to a level below significance with the purchase of off-site land containing both native and non-native grassland habitat.

## LETTER OF COMMENT

Ms. Maggie Loy

3

that impacts to the onsite native grassland would be adequately mitigated by this approach. Native grassland is a much diminished habitat type that is often overlooked during vegetation mapping efforts because it is difficult to accurately delineate. The Wildlife Agencies are concerned that the loss of native grassland is exacerbated by this oversight. With regard to the Sunroad Centrum project site, we request that either the areal extent of the onsite native grassland be accurately determined and accurately represented on project maps, or mitigated at a 1:1 ratio in accordance with the BMO.

### Species-Specific Impacts and Mitigation

Variiegated dudleya and coast barrel cactus are not adequately mapped in either the Biology Report or the Resource Conservation Plan; neither are impacts to these species adequately quantified in these project documents. The maps depicting onsite dudleya and barrel cactus occurrences do not clearly indicate the limits of the distribution of these species or the number of individuals observed within these distributions. Furthermore, surveys for variiegated dudleya were not conducted during the time of year when they are most visible (i.e., during the height of flowering, typically May through June). For this reason, we do not believe that the population numbers reported in the Biology Report provide an adequate assessment of the existing population(s) onsite. Without this information, it is not possible to determine consistency with the BMO for avoidance or mitigation.

The proposed mitigation for impacts to variiegated dudleya and coast barrel cactus consists solely of salvage and translocation of these species into areas within the proposed onsite open space. Translocation of coast barrel cactus has been relatively successful, although this assessment is based on limited information. The ability to successfully translocate populations of variiegated dudleya is unknown. As is the case with many geophytic (e.g., bulbous or cornous plants) plant species (i.e., variiegated dudleys), individuals within a population do not all flower or even produce leaves in any given year (especially in drought years) but lie dormant beneath the soil and go undetected by typical survey procedures. Population estimates based on observed individuals and/or flowering individuals are typically underestimations of true population numbers. In the absence of disturbance, this fluctuation can be attributed to the biological response of the plants to environmental cues (i.e., sufficient rainfall, etc.). Although typical survey procedures may detect population fluctuations, they may not necessarily detect the true population size of variiegated dudleys. Based on the species' biology, we can assume that greater numbers occur on the project site than were apparent during recent surveys. This creates problems when the proposed mitigation involves translocation of individuals, because salvage efforts can miss individuals or even entire sub-populations. Therefore, we do not agree with the presented population estimates, nor do we agree with estimated level of conservation presented.

The FEIR for the East Oryx Mesa Specific Plan states that onsite preservation is the first acceptable approach to compensate for impacts to biological resources. If this cannot be achieved, then acquisition of habitat (or occupied habitat for impacts to species) is preferred over either onsite restoration of habitat or translocation of species. The Wildlife Agencies concur with this approach and consider the translocation of populations (as is proposed for variiegated dudleya and coast barrel cactus) the last resort for mitigating impacts to plant species. Efforts to translocate plant populations into apparently suitable habitat are uncertain and success is often difficult to determine and may take years to achieve, if at all. Even if a translocation is initially successful, translocated

RESPONSE

Ms. Maggie Loy

4

populations may fail to persist over time. Site selection, preparation, propagation, weed control and other activities are necessary in the early stages of the effort. Later, long-term monitoring, habitat management, and corrective measures add to the overall cost of translocation efforts. If it is determined, through monitoring, that translocation has been unsuccessful, then contingency measures (i.e., acquisition of occupied habitat) will need to be implemented.

The County's BMO requires that impacts to narrow endemics (i.e., variegated dudleya) be avoided to the maximum extent practicable. If 100 percent avoidance cannot be achieved, no more than 80 percent of the onsite population can be impacted, and any unavoidable impacts must be mitigated, in-kind, at a 1:1 to 3:1 ratio depending on the importance of the population impacted. The following information should be provided in the final SEIR to document consistency with the BMO:

1. An accurate description, including maps with an appropriate scale that depict on-the-ground occurrences (per County guidelines<sup>1</sup>), and specific quantification of proposed impacts to the variegated dudleya and coast barrel cactus (including areal extent of impact and number and/or density of plants in the impact area).
2. A description of the importance of the onsite populations with respect to their overall distribution.
3. A description of potential on- and off-site mitigation areas for project impacts to these two species.

#### Wetland Impacts, Mitigation, and Permitting

During discussions of potential project impacts to onsite U.S. Army Corps of Engineers (Corps) jurisdictional Waters of the United States (including wetlands) between the County, the applicant, the Corps, and the Wildlife Agencies, the agencies proposed onsite vernal pool enhancement/restoration activities (i.e., weed removal in the proposed onsite open space that encompasses the vernal pool complex, etc.) to offset the effects of fragmenting the vernal pool complex by isolating the southernmost pool with construction of Lone Star Road. It was also suggested that onsite impacts to fairy shrimp-occupied wetlands might be able to be mitigated onsite through creation of vernal pool basins in the existing complex. This comprehensive management/restoration approach was proposed to provide a "functional lift" to the onsite vernal pools in the J-22 complex which has been degraded through past agricultural and grazing activities.

Because creation of vernal pool basins is highly controversial and requires a high level of expertise and knowledge of vernal pool ecosystem functions, the agencies requested that if this approach is considered for this project, local experts (geologists, biologists) be involved in developing the conceptual mitigation plan and implementing the project. Despite its controversial nature, creation of vernal pools/fairy shrimp habitat (which the Wildlife Agencies equate with recreation of basins in a vernal pool landscape) has met with some initial success, as demonstrated by other projects in the Olay Mesa area. If this approach is to be used for this project, we recommend that local experts

<sup>1</sup>That is, one inch on the map represents no more than 200 feet on the ground (1:2,400 scale) and no less than 30 feet on the ground (1:360 scale).

The County concurs that a more precise count of the coast barrel cactus should be conducted. Accordingly, the project's biologist conducted another count of the barrel cactus on August 31, 2000. The results of that survey are included in Appendix B of the SEIR. Based on the new mapping provided as Figure 2.3-1 in the SEIR, the project would impact 47 barrel cactus (53% impacted) and preserves 42 in place. However, the County does not concur that another survey of the variegated dudleya should be conducted. The variegated dudleya was adequately surveyed and the results of that survey show that approximately 240 individuals would be conserved and 60 (20%) would be impacted by the proposed project (see Section 2.3.3 of the SEIR). Impacts to both species were considered significant but mitigable. Given the importance of both species, at least 80% of the onsite population would be required to survive. Good success in transplantation of the barrel cactus and dudleya has been demonstrated in the recent past (Robinhood Estates 1999) and is expected to succeed on the proposed project site. As stated on Pages 2-33 and 2-34 of the SEIR, the proposed open space preservation easement, north of Lone Star Road, would provide suitable habitat for both species. Thus, the proposed translocation of these plants would still be proposed as appropriate mitigation for impacts to the species (see Mitigation Measures 2.3.4.4 and 2.3.4.5). Therefore, the proposed project would be required to mitigate the impacts to the barrel cactus by translocating 47 individuals to the on-site open space easement. Impacts to the variegated dudleya would be mitigated through implementation of the salvage program described in the RCP (Appendix B of the SEIR). After five years, if the salvage/transplantation plan does not succeed, the developer will be required to purchase an existing population of variegated dudleya habitat off-site to the extent to be determined unsuccessful transplantation. In addition, the proposed Mitigation Monitoring and Reporting Program (MMRP) would require a five-year program that insures the success of at least 80% of the population over a 5-year period. The results of the additional survey of the barrel cactus and additional off-site mitigation for the variegated dudleya do not make a significant change to the SEIR, because the significant impacts associated with the plants species would still be mitigated to a level below significant through translocation and/or off-site mitigation banking.

The County concurs that the proposed vernal pool mitigation (vernal pool creation) would require a biologist with experience in vernal pool creation. The proposed MMRP would require the applicant to retain a biologist to work with the wildlife agencies to ensure the successful creation of vernal pool/fairy shrimp habitat. The request for an expert(s) to be involved in the vernal pool mitigation does not make an important change to the SEIR and does not change the outcome of the SEIR.



Ms. Maggie Loy

selected for this project have at least three years local experience with vernal pool restoration or can otherwise demonstrate to our satisfaction that they have the expertise necessary to successfully complete the project.

In order to evaluate the suitability of this approach for this project, detailed information of the existing vernal pool landscape and how it will be transformed into the new vernal pool landscape is necessary. This includes topographic maps with 0.5-foot contours developed through Geographic Information System (and ground-truthed) showing both existing and proposed landscapes. A characterization of the suitability of the soils to support additional basins is also necessary. Because these details were not provided in the RCF, we are concerned with the approach presented therein: to create "fairy shrimp basins" within the existing vernal pool complex.

This Corps should be party to all discussions/correspondence regarding this project because of the potential to impact the J-22 complex with the proposed mitigation. Additionally, because impacts to Waters of the U.S. would result in take of the federally-listed endangered San Diego fairy shrimp and potentially the federally-listed endangered Riverside fairy shrimp (which is assumed to be present in suitable habitat in the onsite agricultural pond, but was not surveyed for) this project will require a section 7 consultation pursuant to the federal Endangered Species Act, as amended.

The Wildlife Agencies do not agree with the 0.02-acre value for the agricultural pond as provided in the SEIR and accompanying documents. An accurate evaluation of the impacts to the pond is crucial in determining suitable mitigation for impacts to San Diego fairy shrimp and Riverside fairy shrimp. Our opinion is supported by the observations of Charles Black (as described in his July 7, 1999, letter to Ms. Robin Church included in Appendix G of the SEIR) and by direct observations of Service biologists. We believe the total acreage within the boundaries of the agricultural pond should be considered as Corps jurisdiction. We recommend the FSEIR include a reevaluation of onsite wetlands and its subsequent affect on the mitigation values.

Depending on the acreage of the reevaluated wetlands, the project may require an Individual Permit from the Corps. This would then require an evaluation of the Least Environmentally Damaging Practicable Alternative pursuant to the Clean Water Act 404(B)(1). These Guidelines require avoidance of wetlands during project design. If impacts cannot be completely avoided, they must be minimized to the maximum extent practicable. The SEIR and accompanying documents do not discuss avoidance or minimization of impacts to onsite wetlands. Although project-related impacts to wetlands have been presented to the Corps, the adequacy of proposed wetland mitigation needs to be evaluated as part of the project-approval process.

Major and Minor Amendment Areas  
Major and minor amendment areas require determination of consistency with the County's Subarea Plan, which includes meeting preserve design criteria and conservation levels for species designated as narrow endemics. Major amendment areas require full disclosure and analysis of the effects of the project on the human environment pursuant to NEPA, CEQA, and state and federal Endangered Species Acts. An 8.0-acre future development area is proposed within the major amendment area. In order to proceed with development, both the major and minor amendment processes must be completed.

C5

C5

C6

C6

C7

C7

This is outside the CEQA/County jurisdiction of the project. The project's biologist (REC Consultants, Inc) met with a representative of the Army Corps of Engineers (Mr. David Zoutendyke) at the project site in August 1999. During that meeting, Mr. Zoutendyke determined that the Corps' jurisdictional boundaries on the agricultural pond were limited to the area of inundation.

The County concurs that the proposed wetland mitigation plan needs to be evaluated by the Army Corps of Engineers (ACOE) during the project-approval process. The proposed project will not be granted a grading permit for Unit 3 of the project until it has received the necessary permits from the ACOE, which will evaluate the wetland mitigation plan prior to issuing permits. This clarification about the ACOE's permitting approval process does not represent an important change to the SEIR.

See Response No. A.1. The County concurs that the Minor Amendment Process must be completed prior to issuance of grading permits for the Sunroad Centrum project. The Minor Amendment would be completed and approved concurrently with the Planning Commission's consideration and approval of the proposed Tentative Tract Map and resource conservation plan, and certification of the Final SEIR. However, the proposed project is not proposing development north of Lone Star Road, therefore, a Major Amendment is not required. Additionally, Page 1-5 of the SEIR has been modified to reflect the revised land use designations on the proposed Tentative Tract Map. This restatement of the MSCP amendment processes does not result in an important change to the SEIR.

Ms. Maggira Loy

Quino checkerspot butterfly

Directed Quino checkerspot butterfly surveys were conducted on the project site in 1999 and no Quino were observed (Appendix F). This project site occurs completely within Survey Area 1 as identified by the Year 2000 Survey Protocol for the Quino checkerspot butterfly. The Service recommends that sites within Survey Areas 1 and 3 have protocol surveys conducted during the survey season immediately prior to any ground-disturbing activities.

In summary, the Wildlife Agencies have identified the following issues that need to be addressed in the FSEIR: 1) mapping of onsite native grassland and more specific grassland mitigation measures; 2) avoidance and species-specific mitigation for vernal pool, and coast barrel oaks that assures consistency with the BMO; 3) refined wetland mitigation measures; 4) the need to process both major and minor amendments for this project; and 5) the need to conduct protocol surveys during the survey season immediately prior to any ground-disturbing activities.

We appreciate the opportunity to provide comments on the SEIR for this project and remain willing to assist you in determining suitable mitigation for impacts to onsite wetlands (in cooperation with the Corps) and in meeting project-specific requirements outlined in the County's MSCP Subarea Plan and BMO. If you have any questions pertaining to these comments, or if we can be of further assistance, please contact Ms. Kim Marsden (Department) at (858) 467-4229, or Mr. Glen Eazard (Service) at (760) 431-9440.

Sincerely,

*Nancy Gilbert*  
Nancy Gilbert

Assistant Field Supervisor  
Carlsbad Fish and Wildlife Office  
U.S. Fish and Wildlife Service

*William E. Tappes*  
William E. Tappes

Habitat Conservation Supervisor  
South Coast Region  
California Department of Fish and Game

cc: Mark Tucker, U.S. Army Corps of Engineers (San Diego Regulatory Branch)  
Harvey Rogoff, Surocal Enterprises  
Elyssa Robertson, KBC

Attachment:  
NOP Comment Letter, October 21, 1999

C8

The County does not concur that another protocol survey for the Quino checkerspot butterfly (QCB) should be conducted. The host plants and hilltopping opportunities for the QCB are not present in the development area. Because the species was not identified on-site during the 1999 survey, another survey is not required. However, this approval does not allow the take of the QCB, because this species is not covered by MSCP. The applicant is required to be in compliance with all federal laws including the endangered species act.

LETTER OF COMMENT

SEP-12-10 12:31PM FROM: CALTRANS PUBLIC AFFAIRS 619-682-3220 T-453 P. 04/16 F-773  
AUG-16-09 12:31 PM CALTRANS PUBLIC AFFAIRS 619-682-3220

GRAY DAVIS, SCHEMATIC

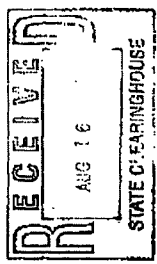
DEPARTMENT OF TRANSPORTATION

DISTRICT 11  
P.O. BOX 85406, M.S. 50  
SAN DIEGO, CA 92186-5406  
PHONE: (619) 688-4854  
FAX: (619) 688-4299



11-SD-905  
P.M. T10.5  
(K.P. T16.8)

*Clare*  
8/16/09



August 15, 2000  
Mr. Scott Morgan  
State Clearinghouse  
1400 Tenth Street  
Sacramento, CA 95814

Dear Mr. Morgan:

Draft SEIR for Sunroad Centrum - SCH 1992101099

Caltrans District 11 comments are as follows:

Supplemental Environmental Impact Report

- Page 2-56, Table 2.5-5: Address mitigation for the generated traffic impacts at the intersections of Otay Mesa Road with Harvest Road and Sanyo Avenue. This is the location of the Sunroad Spectrum facility. D1
- Page 2-57, Table 2.5-6: Show impacts to the Otay Mesa Road intersections at Harvest Road and Sanyo Avenue (project site). These locations are not addressed on this Table. D2
- Page 2-58, Section 2.5.4: Address the future planned improvements to mitigate impacts of traffic generated by this project, and the "fair share" contributions. D3
- Page 2-59, Table 2.5-7: This table shows significant impacts in terms of Level of Service. Address mitigation for these impacts. D4
- Page 2-60: Address the impacts to the Otay Mesa Road intersections at Harvest Road and Sanyo Avenue (project site). Show the interim mitigation for short-term impacts before the completion of SR-125, SR-905, and SR-11. Explain the acceptable Levels of Service. D5
- Page 2-61, Section 2.5.5: The mitigation explained on this page does not address the impact on Otay Mesa Road. Since the construction completion of SR-125 is not noted, mitigation on Otay Mesa Road is requested. D6

RESPONSE

Table 2.5-5 of the SEIR provides a summary of the project's near-term, cumulative impacts to roadway segments, not intersections. Accordingly, the County does not concur that Table 2.5-5 should be revised to address mitigation measures for impacts to the Otay Mesa Road intersections at Harvest Road and Sanyo Avenue. As stated on Page 2-55 of the SEIR, the proposed Sunroad Centrum project would improve three access points off of Old Otay Mesa Road, (Old Otay Mesa Road/Harvest Road, Old Otay Mesa Road/Sanyo Avenue, and Old Otay Mesa Road/"G" Street). All three access points would be designed and constructed to have the lane geometrics shown in Figure 12 on page 41 of the Traffic Study (see Appendix E of the SEIR) to the satisfaction of the Director of the Department of Public Works. The Sunroad Centrum project also would construct a signal at the intersections of Old Otay Mesa Road with Harvest Road and Sanyo Avenue. With these project improvements, the traffic study determined that all three access points would operate at Level of Service C or better under near term cumulative conditions.

D1

Table 2.5-6 of the SEIR does not include the project's impacts to the Otay Mesa Road/Harvest Road intersection because the associated impacts to that intersection are discussed in the project access analysis in the traffic study (see Page 2-55 of the SEIR and Pages 40 and 41 and Appendix I of the traffic study). The results of that analysis show that the intersection would operate at a Level of Service B. The project's impacts to Old Otay Mesa Road/Sanyo intersection is provided in Table 2.5-6. As shown in that table, the intersection would operate at a Level of Service C under near term cumulative conditions. Those levels of service would be achieved with the proposed project's improvements to those intersections.

D2

As a part of the Sunroad Centrum project, the Otay Mesa Road intersections at Harvest Road and Sanyo Avenue would be improved to have the lane geometrics shown in Figure 12 on page 41 of the Traffic Study (see Appendix E of the SEIR). The Sunroad Centrum project also would construct a signal at the intersections of Old Otay Mesa Road with Harvest Road and Sanyo Avenue.

D3

On Page 2-60 (Section 2.5.4) of the SEIR, it is stated that future highway improvements (SR-125 and SR-905) will reduce the near-term cumulative volumes and improve the Level of Service on a segment of Otay Mesa Road between Heritage Road and Old Otay Mesa Road, and at the intersections of Heritage Road, Cactus Road, and La Media Road with Otay Mesa Road (SR-905). The SEIR has been revised to include a mitigation measure (2.5.4.3) that restricts the development of Phase II (Unit 4 on the Tentative Tract Map) until completion of either SR-125 or SR-905.

Also discussed as mitigation on Page 2-62 (see 2.5.4.2) of the SEIR, the project will be responsible for providing one of the three improvement options for Otay Mesa Road and Old Otay Mesa Road intersection and along the segment of Otay Mesa Road between Harvest Road and Otay Mesa Road (SR-905).

Accordingly, the information provided on Page 2-60 of Section 2.5.4 does not need to be repeated on Page 2-58 of Section 2.5.4 of the SEIR.

D4

As shown in Table 2.5-7 and on briefly stated on Page 2-63 of the SEIR, segments of SR-125 and SR-905 are projected to operate at unacceptable conditions with 6-lane geometrics within the study area under the buildout scenario (Phase II). The table does not identify that the project has a significant impact on these facilities. In addition, those levels presented in the table were adopted by the respective responsible agencies during the environmental processes for both projects. Accordingly, the proposed project is not required to implement mitigation measures for those two projects.

D5

See Response No. D.2. and No. D.3.

D6

The County does not concur with this comment. Section 2.5.5 of the SEIR states that there will be unmitigatable near-term impacts to Otay Mesa Road, and those impacts would be mitigated with the completion of SR-905 and/or SR-125. Typical mitigation for similar project impacts would include the construction of an additional through lane in each direction on Old Otay Mesa Road to serve the forecast traffic volumes at an acceptable level of service. However, in this case the soon to be constructed SR-905 Freeway (projected completion date of 2005) and/or SR-125 will reduce the near-term cumulative volumes on the impacted segment of Otay Mesa Road. Therefore, the typical mitigation would be temporary and would not be required for this project.

See Response No. D.3. Mitigation Measure 2.5.4.3 has been added to the SEIR that will restrict the development of Phase II (Unit 4) until either SR-125 or SR-905 is built.

LETTER OF COMMENT

AUG-16-00 WED 12:02 PM CALTRANS PUBLIC TRANS

Mr. Scott Morgan  
August 15, 2000  
Page 2

FAX NO. 015 4333

F.00/00

Technical Appendices-Appendix E, Traffic Study, Section II

- Page 9, Table 2; Explain the source of the numbers used to derive these Levels of Service. D7
- Page 10; Describe what mitigation measures are proposed for the AM and PM peak period impacts before the completion of SR-125, SR-905, and SR-11. D8
- Page 11, Table 4; Trip generations shown are a significant impact. Mitigation is required. D9
- Page 12; Address mitigation for impacts before the completion of SR-125, SR-905, and SR-11. Also, address mitigation should any or all of these State Routes not be built. D10
- Improvement plans for construction within the State right of way must include typical cross sections, adequate structural section, traffic handling plans, and signing and striping plans stamped by a professional engineer. D11
- Any work performed within Caltrans' right of way will require an encroachment permit. For those portions of the project within the Caltrans right of way, the permit application must be stated in both English and Metric units (English first, with Metric in parentheses). Information regarding encroachment permits may be obtained by contacting our Permit Office at 619.688.6158. Early coordination with our agency is strongly advised for all encroachment permits. D12

If you have any questions regarding SR-125, please contact Laurie Berman, Caltrans Route Manager, at 619.688.3631. Any questions regarding SR-905 should be directed to Chuck Davis, Caltrans Route Manager, at 619.688.3156.

Sincerely,

**BILL FIGGE**, Chief  
Development Review and Public Transportation Branch

RESPONSE

D7

As stated on Page 8 of the traffic study (Appendix E of the SEIR), the 1997 Highway Capacity Manual Methodology for signalized and unsignalized intersections was used to analyze the intersections in the project vicinity. Existing turning volumes and lane configurations, which were obtained from field counts, were utilized in conjunction with the Highway Capacity Software, Version 3.1b, to derive the amount of delay and corresponding level of service at each intersection.

D8

Page 10 of the traffic study (see Appendix E of the SEIR) would not be an appropriate place to discuss mitigation measures. Mitigation measures for the project's near term impacts are discussed in "Section IV - Recommended Mitigation Measures", pages 43 through 45 of the traffic study. Prior to completion of SR-125, SR-905, and/or SR-11, Phase I of the project, as described in detail on Page 31 of the traffic study would implement various on- and off-site mitigation measures to reduce the project's impacts. However, some of the project's significant traffic impacts in the near term (one roadway segment and three intersections on Otay Mesa Road) would remain significant until the completion SR-125, SR-905, and/or SR-11.

A mitigation measure has been added to the traffic study (see Appendix E of the SEIR) that restricts development of Phase II (Unit 4) until either SR-125 or SR-905 is built.

D9

Page 16 of the traffic study (see Appendix E of the SEIR) provides the significance criteria that was used in evaluating the project's traffic impacts. Average daily trips (ADTs) were not used to determine the significance of the project's traffic impacts. Instead, the significance of impacts were determined by using the City and County of San Diego's significance thresholds, which are based on the levels of service.

D10

See Response No. D.8. Traffic impacts would be improved to a level below significant with the completion of either one of the future State Route improvements (SR-125, SR-905, or SR-11). The budget for SR-125 has been recently approved by the California Transportation Ventures. In addition, SR-125 and SR-905 are identified as critical regional highways in the East Otay Mesa Specific Plan. Because any one of the proposed highway projects would be inevitably constructed, the provision of optional mitigation for the proposed project's impacts is not required.

D11

Comment noted.

D12

Comment noted.

LETTER OF COMMENT

RESPONSE

SEP-22-00 12:28PM FROM: PLG-15-2820 14:23

619-592-3220

T-488 P.06/06 F-773

STATE OF CALIFORNIA - BUSINESS TRANSPORTATION

MY DAVIS, Governor

DEPARTMENT OF TRANSPORTATION  
AERONAUTICS PROGRAM M.S. #40  
1120 N STREET - ROOM 3300  
P.O. BOX 942874  
SACRAMENTO, CA 94274-0001  
(916) 554-4659  
FAX (916) 653-8531

Per # 9-325-301B

SEARCHED	INDEXED
SERIALIZED	FILED
AUG 16 2000	
STATE CLEARINGHOUSE	

August 15, 2000

Ms. Maggie Loy  
San Diego County DPLU  
5201 Ruffin Road, Suite B  
San Diego, CA 92123-1666

Dear Ms. Loy:

Re: San Diego County's Supplemental EIR for Sunroad Centrum, SCH# 1992101099

The California Department of Transportation (Caltrans) Aeronautics Program has reviewed the above-referenced document with respect to CEQA. The following comments are offered for your consideration.

The proposal is for the subdivision of 250.5 acres into 96 industrial/commercial lots. The project site is located east of Brown Field Airport. According to the Caltrans Airport Land Use Planning Handbook (Handbook), portions of the project site will be within the Inner and Outer Safety Zones, Inner Turning Zone and Traffic Pattern Zone for the future Runway 26R extension. The Inner and Outer Safety Zones are the approach/departure corridors that extend outward directly along the extended runway centerline. The Inner Turning Zone encompasses locations where aircraft are typically turning from the base to final approach leg of the standard traffic pattern while descending from traffic pattern altitude. It also encompasses the area where departing aircraft normally complete the transition from takeoff power and flap settings to a climb mode while beginning to turn to their en route heading.

Structural heights should take into account the future runway extension and be in accordance with Federal Aviation Administration (FAA) Federal Aviation Regulations Part 77. Visual hazards, electronic hazards, labor intensive manufacturing plants and functions, such as aboveground storage of large quantities of flammable materials or other hazardous substances, are some examples of uses that should be prohibited within the airport safety zones. The Handbook recommends a certain percentage of open space within the safety zones.

Coordinating the proposal with Brown Field Airport and the San Diego County Airport Land Use Commission (ALUC) should help ensure the proposal will be compatible with future as well as existing airport operations.

Thank you for the opportunity to review and comment on this proposal. If you have any questions regarding our comments, please call me at 916/654-5314.

Sincerely,

*Sandy Hesnard*  
SANDY HESNARD  
Environmental Planner

c : State Clearinghouse, Brown Field Airport, San Diego County ALUC

E1

E2

E1 Comment noted. However, the County will not place conditions on the Tentative Tract Map because the proposed Brown Field Airport is not an approved project

E2 Comment noted. However, the County will not place conditions on the Tentative Tract Map because the proposed Brown Field Airport is not an approved project