ENVIRONMENTAL-DOCUMENTS

ATTACHMENT A

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DRAFT

FINAL ENVIRONMENTAL IMPACT REPORT

PROJECT: East Otay Mesa Specific Plan

PERMIT: GPA 94-02
LOG #: 93-19-6

The Board of Supervisors has reviewed the enclosed draft Environmental Impact Report (EIR) and revisions by the Planning Commission in Attachment D of the Board Report dated May 11, 1994. Based on that draft, public and agency comments received, and staff analysis, the Board of Supervisors finds that:

1. The attached final EIR (which includes the revisions found in Attachment D) has been completed in compliance with the California Environmental Quality Act (CEQA), and reflects the independent judgment of this Board, and that this Board has reviewed and considered the information contained therein prior to approving the project.

2. The project will have the following environmental impacts:

   Significant But Not Mitigable:

   a. Biological Resources
   b. Noise

   Significant And mitigable:

   c. Land Use
   d. Landform Alteration/Visual Quality
   e. Cultural Resources
   f. Geology and Soils
   g. Hydrology and Water Quality
   h. Transportation and Circulation
   i. Air Quality
   j. Health and Safety
   k. Public Services and Utilities
   l. Population/Housing/Employment

Not Significant:

m. Fire Protection and Emergency Services
n. Police Protection
o. Parks and Recreation
p. Library Facilities
q. Gas and Electricity

3. The Mitigation Measures presented in the EIR discussion have been made conditions of the project approval.

4. Find pursuant to Section 15091 of the State CEQA Guidelines and Sections 21002 and 21002.1 of the Public Resources Code that biological and noise impacts cannot be fully mitigated. Adopt the Statement of Overriding Considerations found in Attachment C, and find that the identified benefits of the project outweigh the unavoidable adverse environmental impacts of the project.

Date Certified: July 27, 1994

LAUREN M. WASSERMAN, Director
Department of Planning and Land Use

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The draft EIR is found in Exhibit C of the May 11, 1994 Board Report regarding the East Otay Mesa Specific Plan.

Draft EIR prepared by: Ogden Environmental and Energy Services,
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ENVIRONMENTAL IMPACT REPORT DISCUSSION

PROJECT: East Otay Mesa Specific Plan

PERMIT: GPA 94-02
LOG #: 93-19-6

PROJECT DESCRIPTION

The East Otay Mesa Specific Plan encompasses some 3,300 acres of land in the Otay Subregional Planning Area. It is a portion of the 5,700 acre County Service Area (CSA) No. 122, located east of Brown Field and north of the International Border. The Plan addresses the future development of this area, primarily with industrial uses, although commercial and residential uses are also proposed.

The objectives of the Plan include the development of industrial and commercial uses to accommodate forecasted growth, protection of open space in the eastern portion of the Plan Area, provision of streets and highways and a circulation system to accommodate forecasted traffic growth, and the development of infrastructure to support these uses.

The East Otay Mesa Specific Plan proposes 2,359 acres of industrial uses, 154 acres of commercial, fire/police services, road right-of-way, a transit station totalling about 32 acres, and 753 acres of hillside residential uses. Current land use designation for this area on the Otay Subregional Plan is (21) Specific Plan Area, while the zone classification is S88.

PROJECT LOCATION

The East Otay Mesa Specific Plan Area is located in the southwestern portion of San Diego County, immediately adjacent to the United States (U.S.)/Mexico border. It encompasses an area of 5,700 acres, of which about 3,300 acres is in the Specific Plan Area. The project site is bounded on the west with the City of San Diego, and further west, by the City of Imperial Beach; on the north by the City of Chula Vista and the unincorporated portion of San Diego County, and by the recently approved 23,000 acre Otay Ranch residential project; on the east by the San Ysidro Mountains; and on the south by the International Border. Two major canyons, Johnson and O'Neal Canyons, drain northward to the Otay River, and are partially in the northern portion of the project area.

LAND USE FACTORS AND SURROUNDING LAND USES

Access to East Otay Mesa is from the north and south from Interstate 805 (I-805), and from the west via Interstate 905 and Otay Mesa Road. Proposed State Route (SR) 125, to be constructed in the near future, will travel through the western portion of the site in a north/south direction. The Otay Mesa International Border crossing is located just west of the site, and Brown Field, a City of San Diego airport, is located one-half mile to the west.

The western and central portions of the mesa are mostly flat, and were in agricultural use for a number of years. That use is now changing, both in County of San Diego and City of San Diego jurisdiction, and several small industrial parks have been developed in the City of San Diego. The eastern portion of the mesa is characterized by hilly terrain that transitions into steep mountains, most notably San Ysidro Mountain and Otay Mountain. This area has not been as disturbed as have the west and central portions, and retains much native vegetation.

Most of the mesa is undeveloped vacant fields. There is one 38 acre auto storage and auction yard, 9 dwelling units, public utility lines and dirt roads. Surrounding land uses include the George F. Bailey Detention Facility and the State of California Donovan Correctional Facility to the north, vacant land to the east, Brown Field and several small industrial parks in the City of San Diego to the west, and the City of Tijuana, Mexico and the Otay Mesa International Border crossing to the south.

BACKGROUND

In 1983, the County of San Diego amended its General Plan to designate the East Otay mesa area for general industrial uses in the flatter terrain, and for low density residential uses in the canyons and hillside terrains. These were amendments to the Otay Subregional Plan. In 1990, the Specific Plan Area Land Use Designation was approved by the Board of Supervisors for this area, to provide for a comprehensive planning framework for future conservation and development of this land. The County proceeded to initiate the East Otay Mesa Specific Plan process in April 1991.

Since that time, the Department of Planning and Land Use has been working closely with the property owners, consultants, adjacent jurisdictions, and affected State and Federal agencies to develop the Specific Plan and the environmental documentation. The initial phase of this effort involved extensive data collection to identify key planning and environmental issues, the development of a comprehensive environmental inventory and mapping of environmental resources, analysis of existing and planned public facilities, evaluation of existing and planned transportation facilities, and the identification of economic factors influential on future development of this area.

The second phase was the development of land use, transportation, and infrastructure concepts in association with the collected environmental data. Opportunities and constraints to development were identified. The third phase was the development of a preferred Specific Plan text and map, design guidelines, and the preparation of an EIR to identify environmental conflicts. The last phase of this project is the public hearing portion of the East Otay Mesa Specific Plan, which is the subject of this present report.

MAJOR ISSUES

1. Land Use (Significant And Mitigable)

Finding: There would be a significant environmental impact that can be mitigated to an insignificant level by the following mitigating measures.

Discussion: The East Otay mesa Specific Plan Area is mostly undeveloped, with the exception of a 38 acre auto storage yard, 9 dwelling units, dirt roads and a few paved roads, and a San Diego Gas and Electric (SDG&E) 230 kV transmission line in a 120 foot easement. A boundary marker to delineate the U.S./Mexico border is found in Section 32, which is about six to eight feet high, and is constructed of masonry materials.

The auto storage yard is operated under a Major Use Permit, P88-020W[1], and was recently approved for a five year extension by the Planning Commission. North of Otay Mesa Road, in the vicinity of the storage yard, are five of the nine dwelling units. Three dwelling units are located at the Kuebler Ranch in the northern part of the Specific Plan Area, while the remaining dwelling is located on Lone Star Road in the western part of the Specific Plan Area. The SDG&E power line is located in the far eastern portion of the Specific Plan Area. Recent historical use of the site has been for agricultural purposes.

Surrounding land uses include the County's George F. Bailey Detention Facility and the R.J. Donovan State Prison north of the project site, vacant and mountainous land to the east, the second International Border crossing to the south, limited industrial development in the City of San Diego to the west, and the City of San Diego's Brown Field, also to the west. On the Mexican side of the border, development includes the Rodriguez International Airport to the west, industrial development to the southwest, some agricultural land to the immediate south, and residential development to the southeast. The City of Tijuana, Mexico is also to the south and west.

The East Otay Mesa Specific Plan Area is located within the Otay Subregional Planning Area and is designated (21) Specific Plan Area, with an allowable residential density of 0.034. It is zoned S88 Specific Plan Use Regulations. The Otay Subregional Plan text identifies that the majority of the Specific Plan Area is to be developed with industrial uses, with low density residential uses designated for the areas over 25 percent slope.

Several projects have been approved or are proposed for parts of the Specific Plan Area. These include an approved Major Use Permit for a 426 acre American International Raceway, an approved 1,233 acre off-highway vehicle park by the State of California, a 400 to 450 acre landfill under consideration by the County Solid Waste Division, a composting site being considered by a property owner, and a sewage sludge monofil project being considered by the City of San Diego.

Neither of the approved projects, the raceway or the off-highway vehicle park, have been constructed, and their future is presently uncertain. All of the proposed projects will be subject to environmental review and also the discretionary review process in the future should their respective proponents continue to pursue them. Specific details of each of these projects is found on Pages 4.1-10 through 4.1-18 of the draft EIR.

Proposed land uses in the vicinity of the Specific Plan Area include planned residential uses in the City of San Diego's Otay Mesa Community Plan to the west, future construction of SR 125 to the west, future construction of SR 905 through the project site, future expansion of Brown Field to the northwest, the proposed Otay Valley Regional Park to the north, the recently approved Otay Ranch, which will primarily be a residential development to the north and northeast, Bureau of Land Management owned lands to the east that have been identified as Wilderness Study Areas, and the City of Tijuana to the south. There was also proposed a major bi-national airport for lands to the west of the Specific Plan Area, known as Twinports. Recent actions by the Federal governments of the U.S. and Mexico have virtually eliminated this concept from further consideration.

Impacts: Implementation of the East Otay Mesa Specific Plan Area will replace presently undeveloped areas with a mix of industrial, residential, and supporting commercial uses, with the dominant use being industrial. Ultimate buildout of the area will result in 2,359 acres of industrial uses, 154 acres of commercial, a maximum of 37 additional dwelling units, and a fire, Sheriff, and trolley station. The local circulation system would be expanded as a part of Specific Plan implementation.

Impacts of Specific Plan Area buildout in relation to existing land uses could result in land use compatibility impacts between residential and industrial/commercial development, impacts to future residences from the State prison and the County detention facility, impacts to the boundary monument and the U.S./Mexico border, and impacts to important farmlands.

Impacts to existing residential uses would be from the incompatibility of industrial and commercial uses due to lighting and noise impacts, and from the loss of open space due to development. Presently, there are only nine habitable dwelling units in the Specific Plan Area; it is anticipated that these will be displaced as planned industrial growth of the area materializes. For property owners who choose to remain in the area, impacts are significant and mitigable.

Impacts to future residents from the State prison/County detention facility will be minimal, as the anticipated density in the portions of the Specific Plan Area identified as residential is low, with a maximum of 37 additional residences allowed.

Impacts to the boundary monument can be mitigated by allowing for continued access for the International Boundary and Water Commission, and for the reservation of a buffer zone where no development would be allowed.

Finally, impacts to important farmlands would be minimal, as the areas designated as prime farmland are few in number, and farming can continue as an interim use prior to full buildout of the Specific Plan Area.

Mitigating Measures:

1A. Mitigation of impacts between residential and non-residential uses include the following:

1. A Site Plan shall be required for the hillside residential area prior to approval of any residential development. The Site Plan shall evaluate land use compatibility impacts in detail, and shall propose detailed mitigation measures to alleviate the impacts. These mitigation measures shall include, but not be limited to, the following:

   a. A 25 foot landscaped buffer between the boundaries of residential/industrial/commercial properties; placement of homes away from light sources.

   b. Adherence to noise mitigation measures required in Section 4.8 of the draft EIR.

   c. Industrial development that is proposed adjacent to residential uses shall submit a Hazardous Materials and Management Plan to the Environmental Health Division of the County of San Diego.

2. Site distance of one foot shall be maintained between Boundary Monument 252 and adjacent monuments, and access for maintenance shall be provided. Specific site drawings shall be required for any development within 60 feet of the border.

2. Landform Alteration/Visual Quality (Significant And Mitigable)

Finding: There would be a significant environmental impact that can be mitigated to an insignificant level by the following mitigating measures.

Discussion: The East Otay Mesa Specific Plan Area ranges in elevation from about 400 to about 1,200 above sea level. The western two-thirds of the mesa are essentially flat, where former agricultural uses predominated. The eastern one-third is characterized by low, gently rolling hills that transition into the steeper hillsides of San Ysidro and Otay Mountains, both of which are outside the Specific Plan Area.

The project site is characterized by undeveloped open space (former agricultural fields) primarily with non-native grasses in the western two-thirds of the site, and vegetated with native Coastal sage scrub and other plant communities as elevations increase. Land uses of the project site have been described in Section 1. above, and will not be repeated.

The Otay Subregional Plan and the Conservation Element of the San Diego County General Plan identify Otay Mountain as a Resource Conservation Area that is significant for both scenic and visual resources, and for biological habitat. However, Otay Mountain is not within the Specific Plan Area.

Impacts: Ultimate buildout of the Specific Plan Are will result in intense development of the flatter portions of the site with industrial and commercial uses, as well as two major highways and a network of surface streets. The hillside portions of the site will be developed with low density residential land uses (1 dwelling unit per 20 acres). Most of the hillside areas would be left in open space, with the allowable dwelling units clustered on the flatter portions of the site. Site Plans will be required to minimize environmental impacts.

For the most part, no significant landform alteration impacts are anticipated in the industrial and commercial parts of the Specific Plan Area. Landform alteration impacts of the hillside residential area will be potentially significant due to the steep slopes in the area, some of which would be graded to accommodate residential development. No development plans have been submitted at this time, so impacts cannot be quantified. However, hillside development projects are subject to Site Plan review, as the Specific Plan proposes to apply the "G" Designator to slopes in excess of 15 percent.

In regard to visual impacts, the Specific Plan includes an urban design element, which includes policies dealing with mitigation of visual impacts. As most of the development will be in the flatter portions of the site, visual impacts would be minimized. Visual impacts could occur from some of the industrial development that could occur adjacent to Johnson Canyon in the northern portion of the Specific Plan Area.

Mitigating Measures:

2A. The "G" Sensitive Resources Designator shall be applied to the hillside residential district as a part of the Specific Plan process. This will require submittal of a Site Plan prior to development.

2B. Site Plans shall be required for any project proposed in the hillside residential district (grading, clearing, site preparation, Administrative Permits, Major and Minor Use Permits, Tentative Parcel Maps, and Tentative Maps).

2C. Site Plans shall include site specific grading plans, placement of housepads, driveways, accessory structures, and any other proposed urban elements to assess impacts at the time of development.

2D. Grading plans for properties adjacent to Johnson Canyon shall incorporate erosion control devices to be put in place prior to construction. 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.

3. Biological Resources (Significant But Not Mitigable)

Finding: There would be a significant and not mitigable environmental impacts to biological resources that cannot be fully mitigated by the present project.

Discussion: Twenty (20) different habitat types are found within the Specific Plan Area: 1) Coastal sage scrub (627.94 acres); 2) disturbed Coastal sage scrub (206.49 acres); 3) Chamise chaparral (75.34 acres); 4) Southern mixed chaparral (3.96 acres); 5) native grassland (27.46 acres); 6) non-native grassland (402.46 acres); 7) Cypress forest (1.04 acres); 8) Mulefat scrub (1.07 acres); 9) Tamarisk scrub (3.18 acres); 10) freshwater marsh (2.27 acres); 11) vernal pools (0.63 acres); 12) disturbed wetland (1.24 acres); 13) Eucalyptus woodland (1.36 acres); 14) exotic trees (0.23 acres); 15) agriculture (1,748.04 acres); 16) disturbed habitat (118.39 acres); 17) developed habitat (73.68 acres); 18) open water (2.55 acres); 19) unvegetated waters of the U.S. (2.46 acres); and 20) rock outcrop/bedrock (0.29 acres). Total acreage of the above habitats is 3,300.08 acres.

Of the above habitat types, the following are considered sensitive by Federal, State, and/or local resource agencies: Coastal sage scrub, native grassland, Cypress forest, freshwater marsh, vernal pools, and wetlands, such as open water.

Approximately 18 sensitive plant species occur in the Specific Plan Area. Of these, impacts could occur to 11 species. These include: Golden-spined cereus, Orcutt's brodiaea, Dunn's mariposa lily, Tecate cypress, Variegated dudleya, San Diego button-celery, Otay tarplant, San Diego marsh elder, Cleveland's goldenstar, Little mousetail, and Prostrate navarretia.

Sensitive animal species found in the Specific Plan Area include the Western spadefoot toad, Coast rosy boa, Two-striped garter snake, California gnatcatcher, Burrowing owl, Golden eagle, Bell's sage sparrow, Orange-throated whiptail lizard, San Diego horned lizard, several raptor species (including the Black-shouldered kite, Northern harrier, and the Copper's hawk), mountain lion, and mule deer. Although not detected on-site, it is expected that the Riverside fairy shrimp and the vernal pool fairy shrimp are likely to occur.

The California gnatcatcher was recently listed as threatened by the U.S. Fish and Wildlife Service. Focused surveys of the project site detected an estimated 47 pairs of California gnatcatcher. They seem to be concentrated in three areas: O'Neal Canyon and the drainages north of the George F. Bailey Detention Facility, the hills south of the Otay Mountain Truck Trail, and a drainage in the easternmost portion of the project area.

In general, the regions with the highest habitat and wildlife qualities are in the eastern and northern portions of the Specific Plan Area. Each of these areas contains a diversity of habitats, including Coastal sage scrub, Southern mixed chaparral, Chamise chaparral, Cypress forest, freshwater marsh, and vernal pools. Wildlife corridors are important in these areas also, as exemplified by Johnson and O'Neal Canyons, in addition to numerous unnamed drainages in the foothills of the San Ysidro Mountains. Most of the remainder of the Specific Plan Area has been disturbed through agricultural use (the western two-thirds of the Specific Plan Area), with the exception of a few areas that contain sensitive habitat and/or sensitive species.

Impacts: For purposes of environmental impact analysis, a worst-case scenario, assuming 100 percent impacts, was used. While this assumption is true for those areas designated for industrial, commercial, and public uses (road right-of-way and public facilities), it is not completely valid for the hillside residential area. Areas identified as hillside residential will be designated as a "G" Sensitive Resource Area. This designation carries with it the need for environmental review of any proposed development, and allows for clustering of development to avoid impacts to sensitive habitat or sensitive species. No development plans have yet been submitted for this area.

The proposed project could result in three different types of impacts: direct, indirect, and cumulative. Direct impacts occur when biological resources are altered, destroyed, or removed as a result of project implementation. Indirect impacts occur when project related activities indirectly affect sensitive biological resources. Cumulative impacts occur when a number of projects affect sensitive species and/or habitats and results in overall depletion of habitats or species.

Impacts can also occur in the following ways: impacts to Federal or State listed species or habitats; impacts to high quality or undisturbed biological communities that are restricted on a regional basis or that serve as wildlife corridors; impacts to habitat that serves as breeding, nesting, or foraging areas for wildlife; or impacts to biological resources of scientific interest due to their physical or geographical limits. Other impacts to animal species include those caused by increased noise and lighting of buildings; impacts due to introduced animal species that often predate on native species; water quality impacts that results in increased erosion and sedimentation; and the increased risk of fire frequency in the area.

Significant and not mitigable impacts to biological resources will occur as follows:

TABLE 1
SIGNIFICANT AND NOT MITIGABLE BIOLOGICAL IMPACTS
EAST OTAY MESA SPECIFIC PLAN

IMPACTS	MITIGATION	RESIDUAL IMPACTS
27 acres Stipa grassland and 40 acres non-native grassland.	Preserve 100 percent Stipa and some of the non-native grassland.	Significant But Not Mitigable if not preserved.
Vernal pool J-22 Complex and potential vernal pool habitat near the border.	Retain 100 percent of J-22 Complex, and survey area near border and preserve those that support sensitive species.	Significant But Not Mitigable if not preserved.
Potential impacts to 834 acres Coastal sage scrub (280 in industrial and remainder in hillside residential).	Preserve majority of habitat on-site and participate in Natural Communities Conservation Plan (NCCP) or Habitat Conservation Plan (HCP) process.	Significant But Not Mitigable if not preserved.
Sensitive plant species - San Diego button-celery, Dunn's mariposa lily, Otay tarplant.	Avoidance/preservation/ open space easements.	Significant But Not Mitigable if not preserved.
Sensitive animal species - Western spadefoot toad, Burrowing owl, raptors, vernal pool species.	Avoidance/preservation/ open space easements.	Significant But Not Mitigable if not preserved.
California gnatcatchers - 18 pairs directly, 4 pairs indirectly.	Participation in NCCP or HCP process; preservation of habitat.	Significant But Not Mitigable if not preserved.

Mitigating Measures: As addressed above, impacts to biological resources resulting from the project are significant and cannot be fully mitigated. After County of San Diego action on the project, implementation will

require various Federal and State permits and/or agreements related to the sensitive biological resources that have been identified on-site. These may include, but may not be limited to, the following:

U.S. Army Corps of Engineers Clean Water Act, Section 404 Nationwide Permit, and/or individual Section 404 Permits; U.S. Environmental Protection Agency 404(b)1 Alternatives Analysis; Regional Water Quality Control Board 401 Water Quality Certification; California Department of Fish and Game Streambed Alteration Agreement; Section 7 or Section 10 Consultation of the U.S. Endangered Species Act; and compliance with the California Endangered Species Act.

Details relevant to the requirements of each of the above agencies are found on Pages 4.3-70 through 4.3-72 of the draft EIR.

The following mitigating measures are proposed to reduce the conflict between the project as proposed and impacts to biological resources and apply to all parcels having a "G" Designator; however, they will not fully mitigate biological impacts:

3A. As individual maps and/or permits are submitted to the County for review, staff biologists from the Department of Planning and Land Use shall review each proposed project for consistency with the mitigation strategies outlined in the draft EIR for the East Otay Mesa Specific Plan, with the East Otay Mesa Biological Technical Report, both dated October 1993, and with the final EIR. For projects that are consistent with the Plan, no additional biological work would be required, with the exception of dedication of open space easements where needed, and with provision of adequate buffers between open space and development. For projects inconsistent with the Plan, additional biological surveys and/or additional environmental review may be required. This will be determined on a case-by-case basis as projects are submitted for review.

The following are general guidelines for vegetation/habitat mitigation:

3B. On-site preservation of sensitive habitats shall be the first mitigation priority and shall be the focus of mitigation efforts. As a secondary option, mitigation may be achieved by off-site preservation. On- or off-site recreation or revegetation is the least preferred method, and is the last preservation plan.

3C. On- or off-site preservation, or on- or off-site revegetation shall be within or adjacent to the area where habitat would be lost, and contiguous to large open space areas already in existence. Preserved land shall be dedicated as permanent biological open space, to the satisfaction of the Director of Planning and Land Use.

3D. Where habitat restoration is allowed, the goal shall be to identify ecologically appropriate areas for restoration, so that proper implementation and maintenance will result in self-sustaining habitats over time. General components of the habitat restoration efforts shall be as follows:

1. The quality of the impacted habitat and consultation with the County and the appropriate regulatory agencies shall determine the required habitat replacement ratio. Replacement ratios shall depend on habitat sensitivity.

2. All restoration efforts shall be conducted in the regional vicinity of the impacts. Restoration of on-site habitats shall be first priority; however, off-site restoration that may be more biologically beneficial will be allowed.

3. Revegetation plans shall be prepared by a qualified restoration biologist or native plant horticulturist, who shall use appropriate planting palettes to maximize the use of native plants.

4. Installation and planting shall be conducted during the rainy season, from November 1 to February 1 of each year.

5. Irrigation shall be required only as necessary during the establishment and monitoring period as determined necessary by the project biologist.

6. Habitat restoration shall attempt to create high quality biological habitat that will improve wildlife values in the area.

7. Restoration areas shall be sited in protected locations with adequate buffers.

8. Long-term maintenance and monitoring of revegetated areas shall be required, and the establishment of a bond or other security instrument to ensure long-term survival of revegetated species shall also be posted by the applicant, to be determined on a case-by-case basis.

3E. Protection of the majority of Coastal sage scrub on-site is required through participation in the NCCP. Any loss of Coastal sage scrub must be mitigated by the requirements established in the subregional NCCP planning body.

1. Any allowable impacts to Coastal sage scrub shall be mitigated through the purchase and preservation of suitable on- or off-site habitat. This habitat shall be within a proposed preserve area or corridor. Mitigation ratios shall not be less than 1:1 in all cases, and may be as high as 3:1.

2. Revegetation programs, if allowed, may be established for disturbed areas within proposed open space areas that are adjacent to existing sage scrub, or are in areas known or suspected to be previously vegetated with Coastal sage scrub. Establishment shall be conducted through seed application and possible supplemental container planting.

3F. Native grassland shall be mitigated by preservation of the majority of the habitat (90 percent of the 27.5 acres). If preservation is not possible, then impacts to native grasslands are not mitigable and resource conservation plans shall be prepared. To substantially lessen the impacts, the following actions must be taken:

1. "In-kind" habitat creation/restoration and/or enhancement shall be required. Restoration shall be conducted in disturbed areas (native or non-native grassland, or bare ground) known or suspected to have supported native grassland. Limited irrigation of restored areas may be allowed. On-site seed collection shall be required and these shall be used as a part of the revegetation effort. Growing of native grassland plugs shall be contracted to a nursery with demonstrated experience with propagating native plants.

3G. Impacts to vernal pools (J-22 Complex) shall be mitigated by preservation of the majority of the habitat where possible. If not possible, then impacts to vernal pools is not mitigable. When not possible, the following actions must take place:

1. The limits of the vernal pool habitat in the J-22 Complex shall be surveyed and staked prior to any construction, after having been mapped in detail by a qualified biologist.

2. The vernal pools north of Lone Star Road shall be preserved in an open space easement connected to the habitat in Johnson Canyon.

3. The two vernal pools south of Lone Star Road shall be mitigated through the purchase and preservation of unprotected vernal pools in the vicinity that are threatened by development. If purchase is not possible, then restoration of degraded vernal pools that occur in the vicinity would also be required. Restoration for impacts to vernal pools shall be at a 1:1 to 3:1 ratio and is dependent upon the quality of the pools being impacted.

4. A vernal pool management plan (resource conservation plan) shall be prepared by a qualified biologist to ensure that preserved habitat is stabilized and maintained.

5. Buffers shall be incorporated between vernal pools and adjacent development, and fencing and/or signage to protect against adverse effects shall be constructed. Minimum buffer widths shall be 100 feet between the edge of the vernal pool habitat and development.

3H. Potential vernal pools near the U.S./Mexico border shall be mitigated by conducting surveys in years of optimum rainfall when projects are proposed in this area (see Figure 4.3.2, draft EIR).

1. If vernal pools are discovered, mitigation shall be by preservation of the majority of the pools and their habitat (95 percent).

2. If preservation is not viable, then off-site preservation of pools under threat of development shall be completed. This would include the preparation of a vernal pool management plan under the direction of a qualified biologist. Other conditions outlined under Condition 3G. above shall be applicable to this potential complex of vernal pools.

3I. Impacts to sensitive on-site plant populations shall be mitigated through preservation as the first priority. Preservation shall be by means of dedicated open space easements to the County of San Diego or other appropriate entity. Off-site preservation shall be allowed only when no feasible alternatives exist to on-site preservation.

1. Restoration and/or revegetation shall be allowed only when the above options are not feasible. The goal of plant species revegetation shall be to identify ecologically appropriate areas for reintroduction so that implementation and maintenance will result in self-sustaining plant populations over time.

2. Mitigation plans shall be developed for sensitive species preservation or avoidance by a qualified biologist/botanist with input from appropriate resource and regulatory agencies. Components of sensitive plant reintroduction programs are listed on Pages 4.3-87 and 4.3-88 of the draft EIR.

3J. For all parcels having a "G" Designator, impacts to sensitive on-site animal species shall be mitigated through avoidance of the species as first priority, preservation by means of dedicated open space easements, and through restoration/creation of appropriate habitat.

1. Avoidance measures shall include conducting pre-construction surveys, flagging habitat as construction-free zones, avoiding construction during the breeding season, and conducting construction activities during the dry months of the year (September, October, November).

2. Open space easements shall be dedicated or the property deeded to an appropriate entity. Off-site preservation of habitat shall only be allowed where no feasible alternatives exist to on-site preservation. Preservation shall also be preferred over habitat restoration/creation programs for mitigating impacts to wildlife.

3. Incorporation of buffers to minimize edge effects of development, provision of wildlife corridors, placement of fencing or buffering within landscaped edges between development, and open space shall be the preferred method of mitigating impacts to wildlife.

4. Restoration/creation of habitat shall be dependent on the sensitivity of the impacted species, and the quality and acreage of the habitat that is being impacted. Replacement ratios shall be determined by the County and/or the appropriate regulatory agencies.

5. Sensitive on-site habitats, including, but not limited to, the majority of Johnson and O'Neal Canyons, most of the J-22 vernal pools, potential vernal pools that may be identified through future surveys near the border, and the native grassland, shall be preserved in dedicated open space easements. This would include appropriate buffer zones between natural open space and developed areas.

3K. Impacts to drainages, wetlands, wildlife corridors, and rock outcrops that harbor sensitive species shall be mitigated by the following:

1. Preservation of open space in drainages that support discrete stands of Southern interior cypress forest.

2. Preservation of drainage buffers and incorporation of buffers for drainages and wetlands.

3. Preservation of rock outcrops in O'Neal Canyon.

4. Preservation of connective wildlife corridors throughout the project area.

3L. Heavy equipment and construction activities, including staging areas or any other construction related activities (fueling or maintenance of equipment), shall be restricted to the development area.

Construction areas and staging areas shall be identified on grading plans and/or improvement plans prior to approval of discretionary permits. Vehicular access shall be prohibited in all open space areas.

4. Cultural Resources (Significant And Mitigable)

Finding: There would be a significant environmental impact that can be mitigated to an insignificant level by the following mitigating measures.

Discussion: The cultural resource investigation of the East Otay Mesa project identified 70 sites within the Specific Plan Area, 46 of which had been previously recorded, and 24 of which had not. Of these 70 sites, 8 have been tested for a determination of site significance.

Approximately 1,900 acres of the 3,300 acre Plan Area had been previously surveyed and did not require re-survey. About 400 acres that had been previously surveyed were spot-checked in the field. About 1,000 acres of the Specific Plan Area required some type of investigation (new survey). The remaining 400 acres could not be surveyed because of dense brush or agricultural growth.

Impacts: Direct, indirect, and cumulative impacts could result with implementation of the proposed project after the discretionary review process. At the general program level EIR stage, it is not possible to determine specific impacts that could result from the project, as there are no proposals for development at this time. Impacts to cultural resources can only be addressed after each resource has been evaluated for importance under the CEQA and the County Guidelines. Landform alteration due to construction and buildout of the project would result in direct, indirect, and cumulative impacts to sites located in potential developed areas.

Impacts to the eight sites previously tested have been mitigated and, with the exception of SDi-12,730, impacts to these sites have been fully mitigated. Sites that have been mitigated include four different portions of SDi-5352, SDi-10,067, SDi-12,880, and SDi-12,881.

Mitigating Measures: For purposes of this project, all untested or unevaluated cultural resource sites are considered as important resources. Later, based on the results of testing, the resources will be determined as either important or not important by the following procedures:

4A. Testing of all untested or unevaluated sites will be conducted prior to approval of any subsequent discretionary permits. Sites determined to be important after testing will be preserved in open space easements or will be subject to additional testing, or both. Impacts to sites determined not to be important will be considered to be adequately mitigated after the testing phase.

4B. Prior to approval of any discretionary permits in the 400 acre area not yet surveyed due to agricultural constraints, a cultural resource survey shall be conducted by a qualified archaeologist in accordance with the County of San Diego Archaeological/Historical Report Procedures.

4C. For sites determined to be important after testing, alternate means of achieving mitigation shall be pursued. These include, but are not limited to, the following:

1. Site avoidance by preservation through capping the site with a layer of sterile fill and placing landscaping on top.

2. Dedication of open space easements to protect the resources.

3. Additional data recovery by implementation of an excavation and analysis program.

4. A combination of one or more of the above measures or additional measures, as appropriate.

4D. Any additional survey, testing, or excavation and analysis must be conducted by a qualified archeologist, in accordance with the San Diego County Archaeological/Historical Report Procedures. Work to be conducted will include the field work, literature review, analysis of artifacts, preparation of a research design prior to commencement of field work, and the preparation of a report describing the results, with recommendations for mitigation of impacts.

4E. All cultural resource work shall be conducted in accordance with the East Otay Mesa Cultural Resource Management Plan, prepared by Ogden Environmental and Gallegos Associates, dated October 1993.

4F. Site preservation shall be the preferred mitigation strategy for cultural resources.

5. Geology and Soils (Significant And Mitigable)

Finding: There would be a significant environmental impact that can be mitigated to an insignificant level by the following mitigation measures.

Discussion: The East Otay Mesa Specific Plan Area is located within the Peninsular Ranges Geomorphic Province, which consists of rugged mountains underlain by pre-Cretaceous metasedimentary and metavolcanic rocks, and Cretaceous plutonic rocks of the Southern California batholith.

Topographically, the project area is characterized by moderately steep foothills along the eastern boundary, and by gently sloping broad mesas with shallow valleys in the western two-thirds of the site. Two major canyons, Johnson and O'Neal Canyons, bound the northern parts of the mesa

and drain toward the Otay River Valley. Other minor drainages on the project site drain south toward Mexico. Elevations on the project site range from 400 to 1,000 feet above sea level.

The Specific Plan Area is underlain by three surficial units, including artificial fill soils, alluvium and topsoil/colluvium, and three bedrock units, including the Tertiary Otay Formation, an unnamed Oligocene age fanglomerate, and by the Jurassic Santiago Peak Volcanics.

The closest known active seismic fault is the Rose Canyon fault, about 10 miles to the northwest, and the Agua Blanca-Coronado fault, located offshore about 19 miles to the west.

Impacts: Potential geological impacts include the following: 1) potential for ground acceleration/shaking due to regional seismic activity; 2) certain areas are susceptible to liquefaction and seismically induced settlement; 3) open reservoirs on-site are susceptible to overtopping during seismic events, resulting in flooding of downstream areas; 4) geological materials may contain adverse bedding or other strata subject to failure; and 5) soil related hazards such as erosion, expansion, or settlement could occur.

Mitigating Measures:

5A. Site specific subsurface geotechnical investigations shall be required for each project proposed in the Specific Plan Area. This shall include, but not be limited to, the following:

1. Design buildings in accordance with the Uniform Building Code seismic design parameters.

2. Incorporate remedial grading and design techniques into removal and replacement of liquefiable soils or construction of deep foundation systems.

3. Remove reservoirs or prepare flood control plans for areas downstream of reservoirs.

4. Perform static and pseudo-static slope stability analyses for proposed cut and fill slopes.

5. Use standard engineering techniques to reduce soil related hazards as outlined in Section 4.5 of the draft EIR.

6. Hydrology and Water Quality (Significant And Mitigable)

Finding: There would be a significant environmental impact that can be mitigated to an insignificant level by the following mitigating measures.

Discussion: The project area lies at the foot of the San Ysidro Mountains and is comprised of two distinct regions, the westerly Lower

Mesa and the easterly Upper Mesa. The Lower Mesa is relatively flat and is typified by sparse development, grassland, and agricultural use, with very little remaining native vegetation. The Upper Mesa is a hilly, undeveloped area, predominantly characterized by native vegetation.

The project area is contained within three watersheds: the Otay River, the City of San Diego, and a watershed that drains into Mexico. The Otay watershed is comprised of four drainage basins; the City of San Diego watershed consists of ten drainage basins; the Mexico watershed is comprised of seven drainage basins. The area is also within the Otay Subunit of the Otay Hydrographic Unit and the Tia Juana Subunit of the Tia Juana Hydrographic Unit, as designated by the San Diego Regional Water Quality Control Board.

Impacts: The proposed project does not include construction within any mapped 100 year floodplains, therefore no impacts to the 100 year floodplain are anticipated. The northern extension of Alta Road will cross O'Neal Canyon, and impacts due to flooding are possible if bridge construction occurs in the Canyon's 100 year floodplain. The addition of impervious surfaces with future development of the Specific Plan Area could increase runoff, which could lead to increased potential of downstream flooding.

However, only minimal impacts are anticipated because increase in peak discharge of runoff have been calculated at only 3.2 percent for the Otay River watershed. Runoff into the San Diego watershed will be handled by provision of on-site detention facilities, so impacts in this area will not be significant. Runoff into the Mexico watershed will be handled so there is no increase in total volume, peak runoff, or flow concentration across the International Border. Relevant details and hydraulic calculations are contained in the Flood Control Master Plan document.

Mitigating Measures:

6A. As individual projects are proposed, they shall be required to construct on-site detention facilities, storm drain facilities, energy dissipators, and erosion control devices to reduce the flow of runoff.

6B. The County and the property owners shall comply with Best Management Practices of the Clean Water Act.

6C. Individual projects shall incorporate proper construction techniques to prevent erosion and off-site transport of sediment.

6D. Bridge construction across O'Neal Canyon shall be completed outside the 100 year floodplain.

7. Transportation and Circulation (Significant And Mitigable)

Finding: There would be a significant environmental impact that can be mitigated to an insignificant level by the following mitigation measures.

Discussion: Current access to the project site is currently limited to three two-lane roadways within the project boundaries: Otay Mesa Road, Alta Road, and Harvest Road. Regional access is provided by a roadway system to the west of the project area that includes I-805, SR 905, Otay Mesa Road, and Otay Valley Road/Heritage Road.

Current Average Daily Trips (ADT) on these roadways is as follows: I-805 - 38,000 ADT south of SR 905, and 93,000 ADT north of SR 905; SR 905 - 35,000 ADT west of I-805, and 30,000 ADT east of I-805; Otay Mesa Road - 43,000 ADT east of SR 905 to 6,000 ADT on the eastern 2 lane section; Otay Valley Road/Heritage Road - 17,000 ADT east of I-805 to 3,000 ADT north of SR 905; Alta Road - no counts currently exist, but traffic volumes are low; and Harvest Road, for which no traffic data currently exists.

Impacts: As part of the future traffic circulation system, a much more extensive system of roadways will be constructed both within and adjacent to the Specific Plan Area in the future. Among these are the eastward extension of SR 905; the construction of SR 125 from the border northward to Interstate 8; and the expansion of Otay Mesa Road, Alta Road, Heritage Road/Paseo Ranchero, Otay Valley Road, and La Media Road. Other roads both within and adjacent to the Specific Plan Area that will be upgraded to different classifications and will be ultimately constructed include Lone Star Road, Siempre Viva Road, Piper Ranch Road, and Sanyo Drive. This will allow for development within the Specific Plan Area and will alleviate future impacts to adjacent areas in the City of San Diego and the City of Chula Vista as they develop in the future.

Mitigating Measures:

7A. The County of San Diego shall work with the Cities of San Diego and Chula Vista to resolve inconsistencies in future roadway designations and shall coordinate roadway design at jurisdictional boundaries.

7B. Prior to the formation of an assessment district to fund the implementation of the regional Circulation Element, projects within the East Otay Mesa Specific Plan are required to provide a traffic impact report to analyze and mitigate their off-site traffic impacts.

Noise

Discussion: As previously stated, the majority of the project area is either undeveloped land or in agricultural use, with only nine single-family residences in the Specific Plan Area. The residences, the State prison, and the County detention facility are all considered existing noise sensitive land uses. In addition, the California gnatcatcher occurs in the project area and is thought to be a noise sensitive species.

Sound level measurements were taken on the project site in July 1992. Existing noise levels are well below the County, State, and gnatcatcher standards, with the exception of the areas in the vicinity of Otay Mesa Road. Existing noise levels emanate from roadway traffic sources, Brown Field Airport, and Tijuana International Airport. Information about existing noise levels is found in Section 4.8 of the draft EIR.

Impacts: Significant noise impacts are likely to occur when noise sensitive land uses are located near noise generating sources. The noise sensitive land uses proposed or existing are the proposed residential land uses in the hillside residential district areas, the existing residences, and the California gnatcatcher habitat. Although not likely, it is possible that the existing residences on-site will remain as industrial land uses are developed around them. Existing and future noise generating land uses in the project area are roadways, airports, light rail transit, various industrial and commercial activities, and noise from the construction of projects implemented in the Specific Plan Area.

Six (6) residences in the project area are expected to be impacted by the calculated future noise levels in excess of the County 60 Community Noise Equivalent Level (CNEL) standard if the residences remain after the industrial areas are constructed. There is also the potential for significant noise impacts to future residences in the hillside residential district. In addition, traffic noise greater than 60 dBA Leq would impact California gnatcatcher habitat in 3 areas where gnatcatchers occur on the project site (O'Neal Canyon and drainages north of the detention facility; the hills south of Otay Truck Trail; and a drainage in the easternmost portion of the study area).

Light rail transit noise will be addressed in the future when an environmental document is prepared for that project. Airport related noise from Brown Field could potentially impact some of the future hillside residential area in the future, and this will be addressed in environmental documents for that area as it develops. Noise from Tijuana International Airport would not be expected to impact areas within the Specific Plan Area.

Noise from the proposed industrial and commercial uses in the Specific Plan Area could impact adjacent residential land uses and habitat for the threatened California gnatcatcher. This will be evaluated when projects

are proposed in these areas. Noise from construction of future projects in this area will be short duration and will cease upon buildout of the area.

Mitigating Measures: The following mitigating measures are proposed to reduce the conflict between the project as proposed and associated noise impacts; however, they do not fully mitigate noise impacts that could result from the project:

8A. Noise sensitive land uses, including existing and proposed residences and all California gnatcatcher habitat, located within the estimated 60 CNEL noise contour shall have site specific noise studies prepared prior to approval of discretionary permits. Siting of industrial and commercial uses shall be such that adequate setbacks are created to minimize off-site noise impacts to sensitive receptors.

8B. Residential development shall be avoided in the areas where the projected CNEL noise contour for Brown Field exceeds 60 dB.

8C. All construction operations shall comply with the San Diego County Construction Noise Ordinance (Section 36.410). All construction operations scheduled to occur within 1,500 feet of California gnatcatcher habitat shall prepare a project specific noise mitigation and monitoring program to demonstrate compliance with established noise standards.

8D. Project specific noise analyses shall be required in the hillside residential district prior to approval of projects in this area to assure noise compatibility with adjacent projects, specifically the offroad vehicle park and the San Diego International Raceway.

9. Air Quality (Significant And Mitigable)

Finding: There would be a significant environmental impact that can be mitigated to an insignificant level by the following mitigating measures.

Discussion: The San Diego Air Pollution Control District maintains an air pollution monitoring station in Chula Vista, which is about 11 miles north of the project site, and has data available over a 5 year period. The Otay Mesa monitoring station began recording data in 1991. Federal ozone standards were exceeded for 3 days in 1991 and State standards for ozone were exceed 13 days in 1991; the most recent data available for the Chula Vista station. For the Otay Mesa station, ozone levels were exceeded 2 days in 1991 per Federal standards and 28 days per State standards.

Impacts: Potential local and regional air quality impacts can occur from construction sources, vehicular travel, and from small stationary sources that can be expected as a result of buildout of the Specific Plan Area. Construction impacts would produce air pollutants in the form of exhaust

emissions from construction vehicles and equipment, and from dust generated during construction. Vehicular impacts would result from the increased traffic expected from buildout of the area. Full buildout of the area would result in additional air quality impacts to the region.

A computer model was used to predict future air quality in the area resulting from these sources. Buildout of the Specific Plan Area would incrementally increase pollution to the regional airshed from all of the above sources. Thus, implementation of the Specific Plan Area would result in a significant impact on regional air quality.

San Diego County currently exceeds ambient air quality standards. As population growth in the County is expected to continue, and as the project is accounted for in the Regional Air Quality Standards (RAQS), project impacts on regional air quality will be mitigated through conformance with the RAQS.

Mitigating Measures: As outlined in more detail on Pages 4.9-16 and 4.9-17 of the draft EIR:

9A. The County shall require applicants to use several techniques to reduce potentially significant construction emissions.

9B. Development projects shall provide bicycle facilities to promote use of alternative transportation methods.

9C. The County shall coordinate with appropriate agencies to implement reduction of vehicle emissions.

10. Health and Safety (Significant And Mitigable)

Finding: There would be a significant environmental impact that can be mitigated to an insignificant level by the following mitigating measures:

Discussion: Most of the site is undeveloped, with the exception of scattered agricultural uses. The former Brown Field Bombing Range is located north/northwest of the site and Brown Field Airport is located due west. The State Donovan Correction Facility is immediately west and the County detention facility is north of the Specific Plan Area.

Impacts: The East Otay Mesa Specific Plan does not permit heavy industrial uses to located within the Specific Plan Area, but lighter industrial uses will be allowed. Uses such as manufacturing, processing, treatment, or fabrication of materials may involve the use of hazardous materials. In addition, the industrial and commercial activities occurring to the south in Tijuana, Mexico could expose people residing or working in the Specific Plan Area to hazardous materials. Finally, the transportation of hazardous materials to and from the project site could expose people to these substances.

Mitigating Measures:

10A. Any industrial development adjacent to residential uses shall submit a Hazardous Materials and Management Plan to the County Department of Environmental Health for approval.

10B. Transportation of hazardous substances shall be conducted in accordance with the California Code of Regulations and the Code of Federal Regulations.

11. Public Services and Utilities (Significant And Mitigable)

Finding: There would be a significant environmental impact that can be mitigated to an insignificant level to the following issues: schools; water; wastewater; and solid waste. There would be an insignificant environmental impact to the following issues: fire and emergency services; police protection; parks and recreation; libraries; and gas and electricity. For the issues that require mitigation, it will be accomplished by the following measures.

Discussion:

Fire and Emergency Services: Most of the Specific Plan Area is provided fire protection and emergency services by the Rural Fire Protection District. One engine is provided by the Donovan Correctional Facility Fire Department and the response time to the Specific Plan Area is five minutes. A small section of the Specific Plan Area is not within a structural fire protection or emergency medical service district.

Impacts: Implementation of the Specific Plan Area would generate new demand for fire protection and emergency services that do not currently exist in the Specific Plan Area. For the first phase of development, either a new temporary or permanent fire station must be located and constructed in the Specific Plan Area. A site has been identified in the Specific Plan text for the location of such a facility.

Since the Specific Plan will not allow the development until adequate fire protection and emergency services are available, and since a fire station site has been identified on the land use map, no significant impacts will occur; therefore, additional mitigation is not required.

Police Protection: Police services are performed by the County Sheriff's Department, but no facilities currently exist in the Specific Plan Area. The closest station is the Imperial Beach station, about 9.5 miles west of the mesa. Acceptable response time to calls per County standards is 8 minutes for priority calls and 16 minutes for non-priority calls. Average response time for the 3 police beats covered by the Specific Plan Area is about 24 minutes for priority calls and 39 minutes for non-priority calls.

Impacts: Implementation of the Specific Plan Area would generate additional demand for police protection services in an area that does not currently meet minimally acceptable standards. For the first phase of development, a new police station will be constructed on the mesa. No development will be allowed within the Specific Plan Area until adequate police services are available, and since a police station site has been identified on the land use map, no significant impacts will occur; therefore, additional mitigation is not required.

Schools: The Specific Plan Area is located in the San Ysidro School District (K-8) and the Sweetwater Union High School District (9-12). Beyer School and San Ysidro Middle School, both about seven miles away, are the closest schools to the Specific Plan Area, while Montgomery Senior High School is the closest upper level school, about ten miles to the west. With the exception of San Ysidro Middle School, all schools are currently operating about permanent capacity.

Impacts: About 35 new students would be generated from the Specific Plan Area to the adjacent school districts, adding to an existing already overcrowded situation. While student generation is minimal, impacts to schools as a result of the Specific Plan Area is still identified as significant.

Mitigating Measures:

11A. Any residential development proposed in the Specific Plan Area shall be subject to State laws governing school impact fees.

Parks and Recreation: There are currently no parks in the vicinity of the Specific Plan Area. The park closest to the Specific Plan Area is Otay Lake Park, about two miles to the north. As of September 1991, it had been closed due to budgetary constraints by the City of San Diego. Several small community parks are located nearby in the City of San Diego (Vista Terrace Park) and the City of Chula Vista (Valle Lindo Park), both several miles to the west. Another park, currently in the planning stages, is Otay Valley Regional Park, located in the Otay River Valley and north of the Specific Plan Area.

Impacts: With a predicted permanent population of 154 persons, an incremental demand for parks in the County would be generated with implementation of the Specific Plan Area. However, due to the planned development of Otay Valley Regional Park, the incremental demand for parkland is not significant. No mitigation is necessary.

Library Facilities: The closest library facility is the Bonita-Sunnyside branch, about ten miles to the north. The City of Chula Vista is planning for three new library facilities in the City, the closest being the Montgomery/Otay branch along Otay Road.

Impacts: The Specific Plan Area would incrementally increase demand for library services due to the population increase of 154 persons. However, new libraries in the planning stages would alleviate impacts resulting from implementation of the Plan. Impacts are insignificant and no mitigation is necessary.

Water Service: The Specific Plan Area is in the Otay Water District boundaries. Existing service lines in the Specific Plan Area range from 10 to 30 inches in diameter. Future water facilities have been planned for by the Otay Water District such as pump stations and parallel transmission mains, which will be constructed through connection fees.

Impacts: Estimated domestic water usage for the Specific Plan Area is 4.1 million gallons per day, based upon 2,016 acres of commercial and industrial uses, and 740 acres (at 1 dwelling unit per 20 acres) of residential uses. No significant impacts related to serving the project with domestic water have been identified, as improvements to existing facilities will be constructed concurrent with need. Mitigation measures will be needed, however, to comply with water demand standards.

Mitigating Measures:

11B. Domestic water demand shall be reduced through use of the Best Management Practices water conservation measures as identified by the Metropolitan Water District and the San Diego County Water Authority. This shall include preparation of a water conservation plan to document these measures.

Wastewater Service: There is no existing wastewater collection system in the Specific Plan Area, nor is the project area located in a wastewater collection district. However, the County of San Diego has purchased 1.0 million gallons per day of sewer capacity in the San Diego Metropolitan Sewerage System from the City of National City. This capacity will be transferred to the Specific Plan Area as the need arises.

Impacts: Wastewater generation of 4.44 million gallons per day is expected at ultimate buildout of the project. The existing 1.0 million gallons per day of capacity will allow development of 400 net acres in the Specific Plan Area. However, prior to accessing this capacity, the Specific Plan Area will need to form a sanitation district. The wastewater phasing plan calls for collection lines to be constructed in Phase 1 roadways throughout the Specific Plan Area. As the Specific Plan Area has capacity for only the first 400 acres of development, potentially significant impacts on wastewater service could result.

Mitigating Measures:

11C. No development beyond that which can be served by the initial 1.0 million gallons per day capacity shall be allowed until long-term sewer service capacity has been provided. In addition, no development shall be allowed until all the necessary infrastructure has been constructed and facilities are operable.

Gas and Electricity: Electrical power and natural gas are provided to the Specific Plan Area by SDG&E. They have overhead transmission lines and a 125 kV line in the eastern part of the Specific Plan Area.

Impacts; SDG&E has indicated that there is adequate load capacity to serve the Specific Plan Area. Impacts will be insignificant and no mitigation measures are required.

Solid Waste: The nearest solid waste facility is the Otay Landfill, about two miles to the north of the Specific Plan Area. The remaining capacity of the landfill is estimated at 24 million cubic yards and the landfill is expected to be in operation until the year 2006.

Impacts: The industrial, commercial, and residential portions of the Specific Plan Area can be expected to generate about 143,983 tons per year of solid waste at ultimate buildout. Development in the Specific Plan Area after the Otay Landfill reaches capacity could result in significant impacts since a landfill for disposal of solid waste may not be available.

Mitigating Measures:

11D. The County shall continue its efforts to site landfill facilities in South Bay.

ALTERNATIVES TO THE PROPOSED PROJECT

No Project Alternative

This Alternative would entail continued land use consistent with existing conditions on the project site. Agricultural fields, scattered homes, and other land uses existing today would remain. SR 125 would be built through Otay Mesa regardless of the chosen alternative. Other land uses that could potentially be developed are the Otay Mesa Off Highway Vehicle Park and the American International Raceway, both of which have been previously approved. No Specific Plan would be adopted.

Significant visual impacts could occur if the off highway vehicle park and the raceway were constructed, but would be minimal under the No Project Alternative. Impacts to biological resources would be less, but could still occur if the off highway vehicle park and the raceway were implemented.

Impacts to some sensitive plant and animal species could be unmitigable with continued or expanded agricultural use of the area. Significant impacts to cultural resources could also occur with continued agricultural use of this area.

The off highway vehicle park and the raceway could also result in significant impacts upon geology and soils, hydrology, water quality, transportation, noise, and public services and utilities. No significant impacts would result to air quality or to health and safety from these projects. It is important to note that environmental documents have been certified for each of these projects and environmental resources have been addressed in those documents.

Existing Otay Subregional Plan Alternative

Under this Alternative, the area would be developed using the existing Otay Subregional Plan land use designations. The Otay Subregional Plan designates the majority of the project area as industrial, or about 2,700 acres. The remaining area is designated low density residential, about 571 acres, and up to 181 dwelling units would be allowed. Only 37 dwelling units are allowed under the project as proposed. No commercial uses would be allowed under the existing Otay Subregional Plan. SR 125 would be built regardless of alternative.

Land use impacts to existing uses could occur with the Alternative, including conflicts between residential, industrial, the raceway, the off highway vehicle park, and the prisons. More intense hillside/visual impacts could occur due to the increased intensity of residential uses that would be allowed in the steeply sloping areas. For cultural resources, impacts could occur to 45 archaeological sites, similar to the proposed project. Geology and soils, hydrology and water quality, and transportation impacts would also be similar to the proposed project.

Issues where impacts would be greater than the proposed project include biological resources, because of increased development on the steep slopes and greater loss of habitat; noise, because there would be no commercial development, and with the increase in industrial development, noise impacts to residential uses would be greater; air quality, due to the additional industrial uses that would be permitted; and health and safety, also due to the increase in industrial and residential acreages.

Environmentally Preferred Alternative

This Alternative would allow industrial development only and would preserve several areas on the project site, designating steeper hillside areas as open space. Less industrial acres would be built under this Alternative and SR 125 would be built regardless of alternative.

This Alternative would have fewer land use impacts since land use interface impacts between residential and industrial uses would not occur. No significant visual or hillside impacts would occur since development would be away from steeply sloping areas. Biological impacts would be substantially

less since the most sensitive portions of the Specific Plan Area would be preserved as open space. Impacts associated with cultural resources would be less as only 42 (instead of 45) sites would be impacted. Impacts to geology and soils, hydrology and water quality, transportation, air quality, and health and safety would be similar to the proposed project.

DISCUSSION OF GROWTH INDUCING IMPACTS

Population growth resulting from implementation of the Specific Plan Area could occur in two ways: from the increase in industrial acreage; and from the use of the eastern hillside area for residential purposes.

While the increase in industrial uses will result in positive socio-economic benefits due to the creation of 21,000+ jobs in the region, it also means that utilities will need to be extended into the area to accommodate the planned industrial development.

However, the extension of infrastructure into the Specific Plan Area is not considered growth inducing because of the geographic location of the project site. The East Otay Mesa Specific Plan Area is on the edge of developable land in the County. It is bounded by Mexico on the south, the planned Otay Ranch on the north, and by the steep San Ysidro Mountains to the east. Population growth in this area is severely constrained by topography and accessibility, both of which are very limited. Thus, while additional infrastructure will be available to serve the Specific Plan Area, growth will be limited to the project site and will not be able to expand beyond this area.

The residential use allowed with implementation of the Specific Plan Area would mean an increase of 37 dwelling units permitted on-site. The existing Otay Subregional Plan would allow for 181 units within the Specific Plan Area. Thus, the decrease in the number of allowable units would lessen residential growth inducing impacts. For the same reasons as stated above, residential growth will be limited in the Specific Plan Area due to topography and inaccessibility of the site.

DISCUSSION OF CUMULATIVE IMPACTS

Cumulative environmental impacts must be considered under the CEQA to assess the effects of other current projects, the effects of past projects, and the effects of probable future projects in the area in conjunction with the current project.

Other projects proposed for this general region have been subject to the same environmental requirements as the present project. In terms of land use, other projects have identified on-site land use displacements, compatibility with other adjacent land uses, compatibility of land uses internal to the projects, and consistency with applicable land use policies, goals, and objectives.

From a cumulative standpoint, the other projects proposed in the vicinity would continue a pattern of land conversion from undeveloped or underdeveloped land to one of urban development. The total gross acres involved in other projects, including the Specific Plan Area, are more than 33,800 acres. The cumulative loss of agricultural lands and open space is a significant cumulative environmental impact.

Landform alteration and visual impacts would also be impacted on a cumulative basis, as loss of agricultural lands and open space would be noticeable in the subregion. However, the visual effect of the eastern San Ysidro Mountains would not be affected.

Cumulative biological impacts would also be felt with the subregional development of the area. The loss of vegetation and habitat in the Specific Plan Area represents a cumulative, significant impact in a regional context given the potential loss of open space on this and surrounding projects. Participation in large-scale habitat mapping programs, such as the Multi-Species Conservation Plan (MSCP), the NCCP, or the development of a resource management plan would assist in alleviating this impact.

Impacts to cultural resources would also be cumulative with implementation of this project and surrounding development. Any geology/soils impacts associated with development on this or surrounding properties would be site-specific, as would hydrology and water quality impacts. Transportation impacts will be both short- and long-term and cumulative as the area builds out, as are noise and air quality impacts.

Health and safety impacts could be greater given the industrial nature of the area, but not on a cumulative basis since adjacent development to the north and west will likely be residential. Finally, impacts to schools and regional water demand will be regionally significant as development continues both on the project site and in the subregion.

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