

Appendix A
***Notice of Preparation / Public Comments
Received on the NOP and Initial Study***



County of San Diego

MARK WARDLAW
DIRECTOR
PHONE (858) 694-2962
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PLANNING & DEVELOPMENT SERVICES
5510 OVERLAND AVENUE, SUITE 310, SAN DIEGO, CA 92123
www.sdcounty.ca.gov/pds

DARREN GRETLER
ASSISTANT DIRECTOR
PHONE (858) 694-2962
FAX (858) 694-2555

NOTICE OF PREPARATION DOCUMENTATION

DATE: March 11, 2016

PROJECT NAME: OTAY 250- SUNROAD EAST OTAY MESA BUSINESS PARK
SPECIFIC PLAN AMENDMENT, GENERAL PLAN AMENDMENT,
REZONE, AND TENTATIVE MAP

PROJECT NUMBERS: PDS2015-SP-15-001, PDS2015-GPA-15-008, PDS2015-REZ-15-
007, PDS2015-TM-5607

PROJECT APPLICANT: SUNROAD OTAY PARTNERS, L.P.

ENV. REVIEW NUMBER: PDS2015-ER-15-98-190-13G

PROJECT DESCRIPTION:

The proposed *Otay 250 Sunroad – East Otay Mesa Business Park Specific Plan Amendment* project site is located within the approved East Otay Mesa Business Park Specific Plan area and encompasses approximately 253.13 acres, including approximately 218.12 acres of lot area and approximately 35.01 acres of right-of-way area. The project proposes a Specific Plan Amendment (SPA) to the East Otay Mesa Business Park Specific Plan to establish a new Mixed-Use Village Core area within the Specific Plan Area, which would allow for the establishment of a mix of employment, retail, and residential emphases. Approval of the project would allow for the entitlement of a maximum of 3,158 dwelling units, 84,942 square feet of general commercial uses, and 1,389,564 square feet of employment uses, and approximately 51.3 acres of permanent biological open space. In 2012, the applicant received approval for Tentative Map 5538 (TM 5538) which entitled the development of Technology Business Park Use on the project site. The revised project proposes the maximum development potential (numbers of residential units, square footage of employment use, and square footage of commercial use) based upon the previously approved peak-hour traffic volumes from TM 5538.

The project also requires an amendment to the Otay Subregional Plan (GPA) in order to allow for the establishment of mixed-uses within the community plan area, a Rezone (REZ) to accommodate the introduction of mixed-uses, a Tentative Map (TM) to subdivide the land, and a Supplemental Environmental Impact Report (SEIR) to evaluate the associated environmental impacts.

The County's General Plan currently designates the project site as *Village* - Regional Category, and *Specific Plan Area* - Land Use Designation. The project site is assigned S-88 Zoning, and development of the site is regulated by the East Otay Mesa Business Park Specific Plan (EOMSP). The EOMSP further designates the site as Technology Business Park, and approximately 28.8 acres in the southwest corner of the project site has an existing Commercial Overlay. The existing Technology Business Park Land Use Designation is intended for development of manufacturing options and business offices that research, develop, and produce advanced technologies.

The project proposes to establish the following three land use designators allowing for a mix of residential, employment, and retail uses: Mixed-Use Residential Emphasis; Mixed-Use Employment Emphasis; and Mixed-Use Retail Emphasis. The project would include a range of densities and a mix of uses across the planning area as indicated by the new designations and allowable housing types include single-family detached, duplexes, townhomes/rowhouses, and multi-family product types. The commercial component is intended to provide small scale shopping/retail uses and could include shopping centers, grocery stores, local convenience markets, personal services, and outdoor cafes or other dining establishments. The employment component would include typical uses such as custom manufacturing, wholesale storage and distribution, and research and development businesses. Site plans would be required to be submitted for each lot as part of the discretionary review at the time that development is proposed.

Earthwork is estimated to consist of 1,350,000 cubic yards of balanced cut and fill. Construction of the project is anticipated to occur in phases over a period of several years, in response to market demands and in accordance with a logical and orderly expansion of roadways, public utilities, and infrastructure. Infrastructure and roadway improvements would be constructed in phases, as needed to ensure that improvements are in place at the time of need.

The proposed project would construct public roadway improvements including Sunroad Boulevard, Sunroad View Drive, Alejandro Drive, and extensions of Harvest Road and David Ridge Drive. The project would also construct half-width improvements to Vann Center Boulevard from Otay Mesa Road to just south of Lone Star Road; Zinser Road from west of Sunroad Boulevard to Alejandro Drive; Lone Star Road along the portion that traverses the northeast portion of the project site; and Harvest Road along the southwest project border.

All circulation element roadways would include Class 2 bike lanes and the project includes two segments of off-site trails. One segment would occur in the north-central portion of the project, and the second would occur in the western portion of the project site.

The project would be provided water and sewer service by the Otay Water District. Water and Sewer service are located adjacent to the project site. Natural gas and electricity in the project area would be provided by the San Diego Gas & Electric Company.

PROJECT LOCATION:

The project site is located generally at the northeastern corner of Otay Mesa Road and Harvest Road/SR-125. The project is located in the Otay Community Planning area, within unincorporated San Diego County. The Regional Location Map shows the proposed project site's relationship within San Diego County. The Vicinity Map shows the proposed project area.

PROBABLE ENVIRONMENTAL EFFECTS:

The probable environmental effects associated with the project are detailed in the attached Environmental Initial Study. All questions answered "Potentially Significant Impact" or "Less than Significant with Mitigation Incorporated" will be analyzed further in the Supplemental Environmental Impact Report. All questions answered "Less than Significant Impact" or "Not Applicable" will not be analyzed further in the Environmental Impact Report.

The following is a list of the subject areas to be analyzed in the SEIR and the particular issues of concern:

Aesthetics	Land Use & Planning
Air Quality	Hazards and Haz Materials
Biological Resources	Public Services
Cultural Resources	Recreation
Greenhouse Gas Emissions	Transportation & Traffic
Noise	Mandatory Findings of Significance

PUBLIC SCOPING MEETING: Consistent with Section 21083.9 of the CEQA Statutes, a public scoping meeting will be held to solicit comments on the SEIR. This meeting will be held on March 22, 2016, at the Bonita-Sunnyside Library, located at 4375 Bonita Road, Bonita, CA 91902 at 5:00 p.m.

The environmental Initial Study checklist can be viewed at
http://www.sdcounty.ca.gov/pds/ceqa_public_review.html.

Attachments:

- Vicinity Map
- East Otay Mesa Specific Plan Land Use Map
- Specific Plan Amendment Proposed Conceptual Land Use and Circulation Plan

FIGURE 1
Vicinity Map

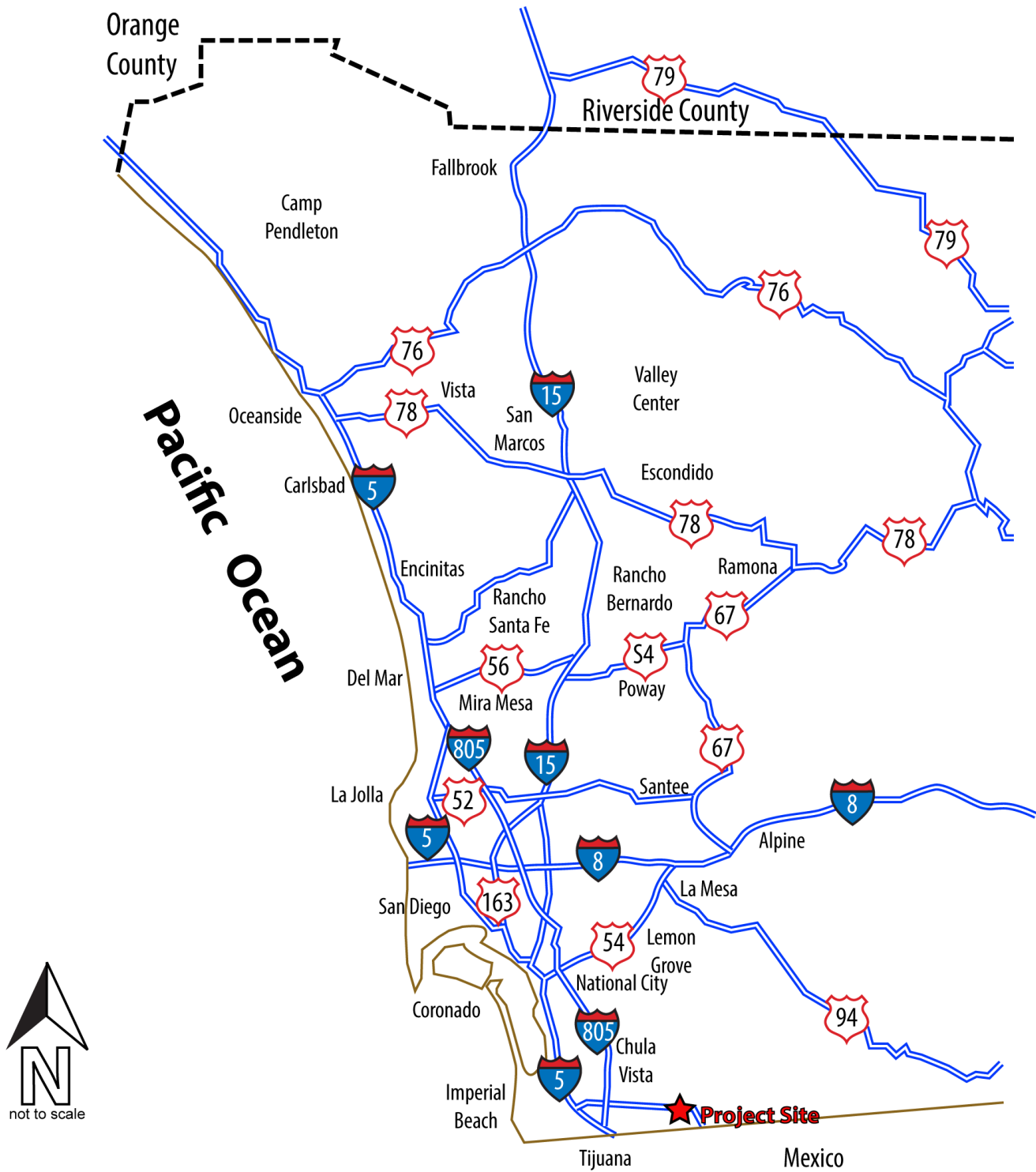


FIGURE 2
East Otay Mesa Specific Plan Land Use Map

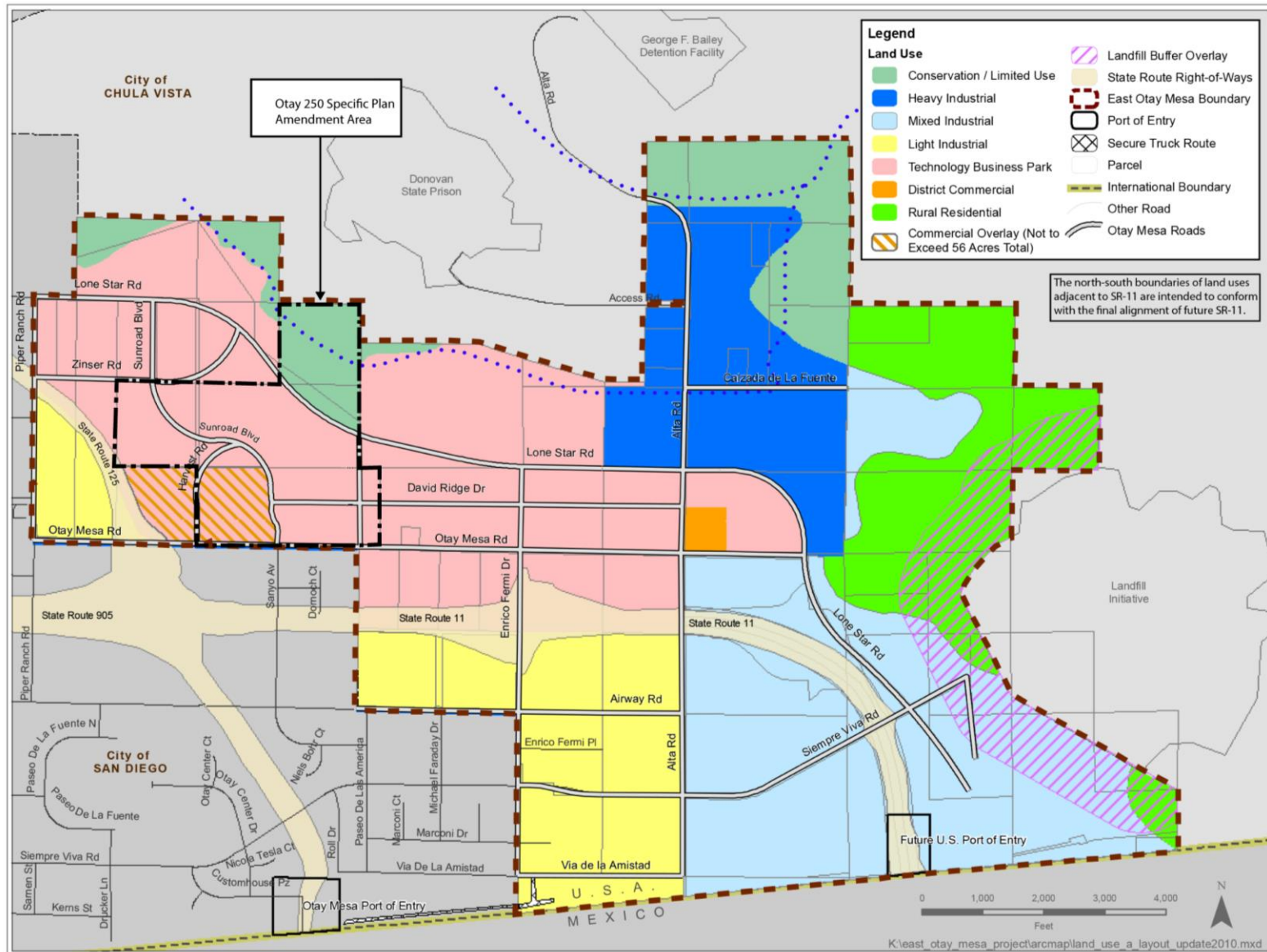
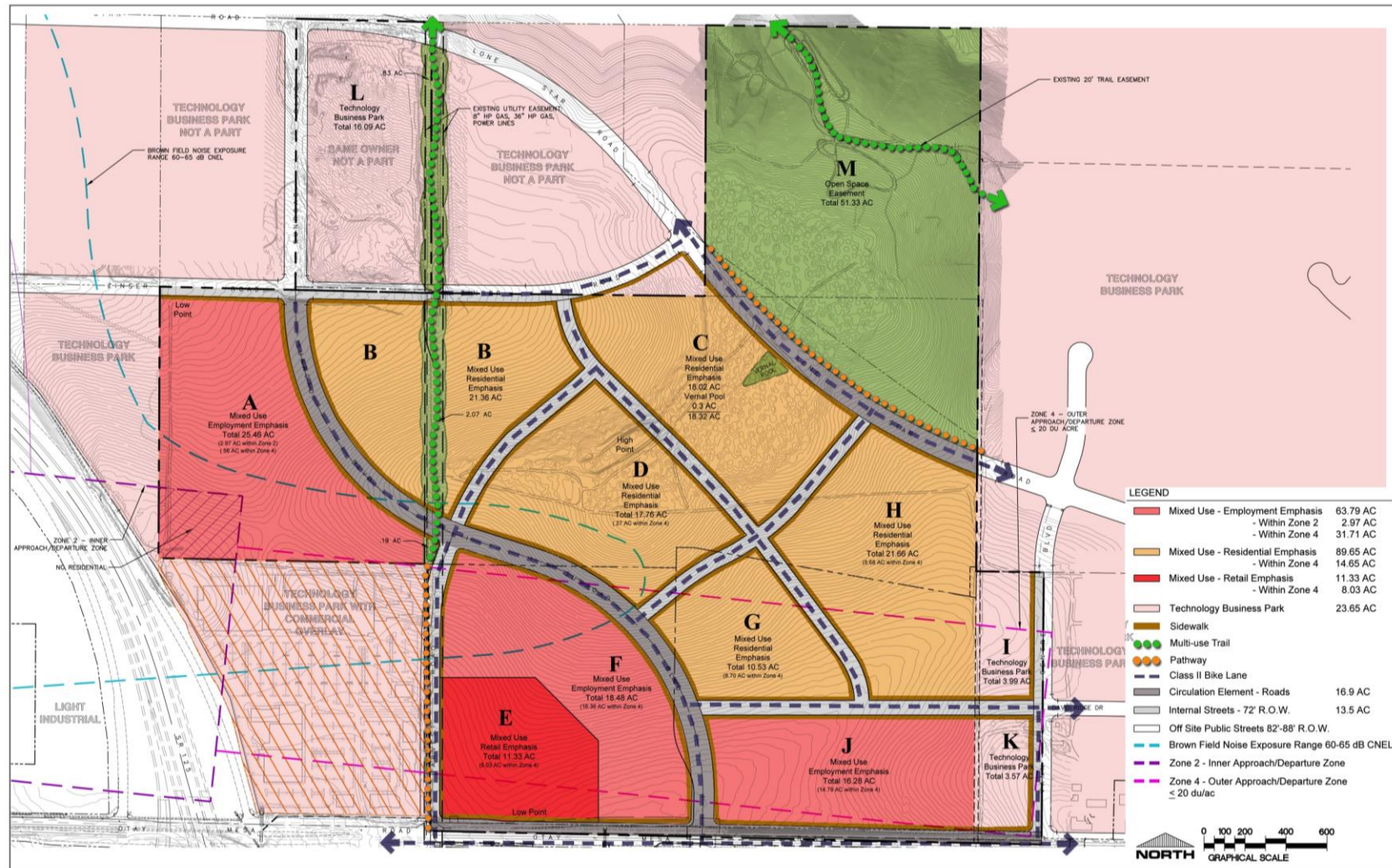


FIGURE 3
Specific Plan Amendment Proposed Conceptual Land Use and Circulation Plan





U. S. Fish and Wildlife Service
Carlsbad Fish and Wildlife Office
2177 Salk Avenue, Suite 250
Carlsbad, California 92008
(760) 431-9440
FAX (760) 431-9624



California Department of Fish and Wildlife
South Coast Region
3883 Ruffin Road
San Diego, California 92123
(858) 467-4201
FAX (858) 467-4299

In Reply Refer To:
FWS/CDFW-16B0236-16CPA0278

APR 11 2016

Ms. Kelly Bray
County of San Diego, Planning and Development Services
5201 Ruffin Road, Suite 310
San Diego, California 92123

Subject: Comments on the Notice of Preparation of the Otay 250 - Sunroad East Otay Specific Plan Amendment (SCH# 20116031028, CEQA-2016-0174-0000-R5)

Dear Ms. Bray:

The U.S Fish and Wildlife Service (Service) and the California Department of Fish and Wildlife (Department), hereafter collectively referred to as the Wildlife Agencies, have reviewed the above-referenced Notice of Preparation (NOP) dated March 14, 2016, for a Supplemental Environmental Impact Report (SEIR). The Wildlife Agencies have identified potential effects of this project on wildlife and sensitive habitats. The project details provided herein are based on the information provided in the NOP and associated documents.

The project site is generally located at the northeastern corner of Otay Mesa Road and Harvest Road/State Road-125 (SR-125). The project is located in the Otay Community Planning area, within unincorporated San Diego County. The proposed Otay 250 Sunroad – East Otay Mesa Business Park Specific Plan Amendment project site is located within the approved East Otay Mesa Business Park Specific Plan area and encompasses 253.13 acres, including 218.12 acres of lot area and approximately 35.01 acres of right-of-way area for various roadway improvements. The project proposes a Specific Plan Amendment (SPA) to the East Otay Mesa Business Park Specific Plan to establish a new Mixed-Use Village Core area within the Specific Plan Area, which would allow for the establishment of a mix of employment, retail, and residential uses. The proposed project would allow for the entitlement of a maximum of 3,158 dwelling units, 84,942 square feet of general commercial uses, and 1,389,564 square feet of employment uses, and approximately 51.3 acres of permanent biological open space. The project also requires an amendment to the Otay Subregional Plan, a Rezone to incorporate mixed uses, and a Tentative Map to subdivide the property.

The primary concern and mandate of the Service is the protection of fish and wildlife resources and their habitats. The Service has the legal responsibility for the welfare of migratory birds, anadromous fish, and threatened and endangered animals and plants occurring in the United States. The Service also is responsible for administering the Federal Endangered Species Act of 1973 (Act), as amended (16 U.S.C. 1531 *et seq.*), including habitat conservation plans (HCP) developed under section 10(a)(1)(B) of the Act. The Department is a Trustee Agency and a Responsible Agency pursuant to the California Environmental Quality Act (CEQA; §§15386 and 15381, respectively) and is responsible for ensuring appropriate conservation of the State's biological resources, including rare, threatened, and endangered plant and animal species

pursuant to the California Endangered Species Act (Fish and Game Code §2050 *et seq.*) and other sections of the Fish and Game Code. The Department also administers the Natural Community Conservation Planning (NCCP) program (Fish and Game Code 2800, *et seq.*). On March 17, 1998, the Service and Department issued their respective permits for the Multiple Species Conservation Program (MSCP) County of San Diego (County) Subarea Plan (SAP). The County's SAP is the mechanism by which the County has obligated to assemble a preserve consistent with the goals of the MSCP Subregional Plan.

The Wildlife Agencies have been working with the County concerning projects in East Otay Mesa since 1998. Previously, a MSCP Minor Amendment request was submitted to the Wildlife Agencies by the County for the Sunroad Centrum project. In a letter dated November 12, 2003, the Wildlife Agencies concurred with the amendment request provided certain conditions were required of the project. These conditions included the implementation of conservation measures outlined in the Service's biological opinion (FWS-DG-944.5), and modifications to the Resource Conservation Plan (RCP) that was originally proposed for the Sunroad Centrum project. Provided the impacts to sensitive and listed species have not changed from the previous project, these measures should be included as mitigation measures in the SEIR. If there are changes to the project impacts or mitigation measures, our Minor Amendment concurrence will need to be re-evaluated based on the current project design.

Most recently, we have been meeting with County staff to discuss East Otay Mesa issues and, in particular, the need to conserve grasslands to support burrowing owls and other covered species. In past discussions with the County, the economic value of industrial zoned lands has been emphasized and the County has expressed desire to minimize loss of such land. Based on the NOP, it appears that the emphasis for the new project is on mixed use residential, employment, and retail. It has been our experience that there can be more flexibility in siting residential units (e.g., clustering) than industrial space. Otay Mesa supports the only known burrowing owl population within the MSCP, and there are existing conserved lands for the burrowing owl located just north of the proposed project site. We recommend that the SEIR evaluate opportunities to maximize onsite conservation of grassland habitat and burrowing owl in light of the proposed change in land use. The Wildlife Agencies would like to work with the County and applicant to explore the potential for further avoidance and minimization of impacts to grassland habitat.

We offer the following specific comments and recommendations to assist the County in avoiding, minimizing, and adequately mitigating project-related impacts to biological resources, and to ensure that the project is consistent with all applicable requirements of the approved SAP.

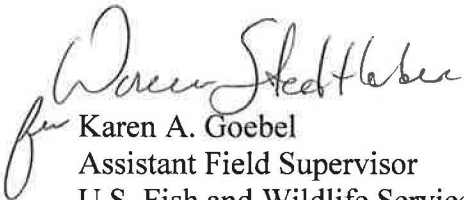
1. The SEIR should address whether or not the construction footprint and areas of dedicated conservation have changed from the previously approved project. If any changes to the footprint have occurred, please show them clearly on a map and describe land uses within changed areas.
2. There are a number of endangered, threatened, MSCP-covered and narrow endemic species and their habitats known to occur in and around the project area. These include but are not limited to: San Diego fairy shrimp (*Branchinecta sandiegonensis*), Riverside fairy shrimp (*Streptocephalus woottoni*) and associated vernal pools, burrowing owl (*Athene cunicularia*), golden eagle (*Aquila chrysaetos*), quino checkerspot butterfly (*Euphydryas editha quino*), variegated dudleya (*Dudleya variegata*), and Otay tarplant [*Deinandra conjugens*]

(*Hemizonia c.*)]. Updated surveys are necessary to determine impacts to species and habitats from the proposed action for all of these species except the golden eagle. Any impacts to sensitive species that have not been previously addressed must be avoided or mitigated for consistency with the SAP and the County Biological Mitigation Ordinance, and other relevant documents such as the Strategy for Mitigating Impacts to Burrowing Owls in the Unincorporated County (Biological Report Format Appendix A). Regarding potential presence of quino checkerspot butterflies, the County does not have coverage for this species under their approved MSCP, therefore, mitigation for impacts would require another federal mechanism or completion of an amendment to the MSCP to add coverage for that species.

3. The SEIR should address direct and indirect impacts of the change in use from industrial to mixed use, and the incorporation of residential uses. These include increased human presence and desire for local trails and public access to the MSCP preserve, indirect effects of lighting, invasive species introduction, and increased runoff. We strongly encourage early discussion among the County, applicant, and Wildlife Agencies regarding the number and location of any proposed trails, as these project features were not addressed previously.
4. The SEIR should also include an analysis of the former RCP to see if it requires an update to address impacts of the current project. For example, funding, site management, monitoring, and reporting should be reevaluated to make sure it is adequate to address potential management issues. Please demonstrate that the updated RCP addresses the issues raised in the November 1, 2002 and November 14, 2003 letters from the Wildlife Agencies, and is adequate and current considering the Management Strategic Plan and current protocols for quino checkerspot butterfly, burrowing owl, golden eagle, and vernal pools.

We appreciate the opportunity to comment on this NOP. The comments and recommendations provided are based on our knowledge of sensitive and declining vegetation communities in the County of San Diego and our participation in regional conservation planning efforts. If you have questions or comments regarding this letter, please contact Elyse Levy of the Department at (858) 467-4237, or Susan Wynn of the Service at (760) 431-9440 extension 216.

Sincerely,



Karen A. Goebel
Assistant Field Supervisor
U.S. Fish and Wildlife Service



Gail K. Sevens
Environmental Program Manager
California Department of Fish and Wildlife

cc: State Clearinghouse

From: Dan Silver dsilverla@me.com

Subject: Otay 250- Sunroad East Otay Mesa Business Park Specific Plan Amendment; PDS2015-SPA-15-001, PDS2015-GPA-15-008, PDS2015-REZ-15-007, PDS2015-TM-5607, LOG NO. PDS2015-ER-15-98-190-13G

Date: March 14, 2016 at 12:05 PM

To: Bray, Kelly Kelly.Bray@sdcounty.ca.gov

DS

Dear Kelly

Endangered Habitats League is in recent of this NOP for a Supplemental EIR. We will be particularly interested in MSCP conformance and Minor Amendment and related biological analysis. We urge early coordination with USFWS and CDFW.

Please keep us on mailing and distribution lists for this project.

With best wishes,
Dan

Dan Silver, Executive Director
Endangered Habitats League
8424 Santa Monica Blvd., Suite A 592
Los Angeles, CA 90069-4267

213-804-2750
dsilverla@me.com
www.ehleague.org



9335 Hazard Way • Suite 200 • San Diego, CA 92123
(858) 614-7755 • FAX (858) 614-7766

San Diego Local Agency Formation Commission

Website: www.sdlafco.org

Chairman

Bill Horn
County Board of
Supervisors

April 4, 2016

Vice Chairman

Sam Abed
Mayor
City of Escondido

TO: Kelly Bray, Project Planner
Department of Planning & Development Services (O650)

FROM: Joe Serrano, Local Governmental Analyst
Local Agency Formation Commission (O216)

Members

Dianne Jacob
County Board of
Supervisors

Andrew Vanderlaan
Public Member

Lorie Zapf
Councilmember
City of San Diego

Lorraine Wood
Councilmember
City of Carlsbad

Jo MacKenzie
Vista Irrigation District

Ed Sprague
Olivenhain Municipal
Water District

SUBJECT: Request for Agency Comment: Notice of Preparation of a Draft Environmental Impact Report (Otay 250 – Sunroad East Otay Mesa Business Park Specific Plan Amendment; PDS2015-SPA-15-001, PDS2015-GPA-15-008, PDS2015-REZ-15-007, PDS2015-TM-5607, LOG NO. PDS2015-ER-15-98-190-13G)

Thank you for the opportunity to provide comments on the above-referenced project. LAFCO is responsible for encouraging the efficient provision of public services and has purview over changes to local government organization and any associated sphere of influence actions. In addition, LAFCO is typically a responsible agency for environmental review when jurisdictional changes and/or sphere amendments are proposed.

Alternate Members

Greg Cox
County Board of
Supervisors

Chris Cate
Councilmember
City of San Diego

Racquel Vasquez
Councilmember
City of Lemon Grove

Harry Mathis
Public Member

Vacant
Special District

The project area includes nine unincorporated parcels, encompassing approximately 253.1 acres and is intended to establish a maximum of 3,158 dwelling units, 84,942 square feet of general commercial uses, 1,389,564 square feet of employment uses and approximately 51.3 acres of biological open space. The request letter does not identify any jurisdictional boundary changes associated with the project; however, there has been a recent reorganization involving the current fire service provider. The project area is currently within the Rural Fire Protection District and will be dissolved later this year. As part of the dissolution, County Service Area No. 135 was identified as the successor agency and will provide structural fire protection and emergency medical services within the dissolved territory upon the recordation date, which is tentatively scheduled for July 2016.

San Diego LAFCO has no further comments. While LAFCO will have no involvement with this project as proposed, LAFCO would be a responsible agency for the proposed project's environmental review and have discretion over a jurisdictional change if the project is modified and requires any change to local government and/or sphere of influence. In that case, those jurisdictional actions should be identified and discussed in the project description and listed as discretionary actions in the summary section of the environmental document.

Executive Officer

Michael D. Ott

Legal Counsel

Michael G. Colantuono

Should you have any questions, or if LAFCO may be of any further assistance, please contact me at (858) 614-7764.

JOE SERRANO
Local Governmental Analyst



April 11, 2016

Via email only to: Kelly.Bray@sdcounty.ca.gov

Kelly Bray
Land Use Environmental Planner III
Department of Planning and Development Service
COUNTY OF SAN DIEGO
5510 Overland Avenue, Suite 310
San Diego, CA 92123

Re: Otay 250- Sunroad East Otay Mesa Business Park Specific Plan Amendment;
PDS2015-SPA-15-001, PDS2015-GPA-15-008, PDS2015-REZ-15-007, PDS2015-TM-
5607, LOG NO. PDS2015-ER-15-98-190-13G.

Dear Kelly:

Marathon Land & Cattle Company has received the Notice of Preparation dated March 11, 2016 for the above-entitled project. We have the following comments. References are to the sections in the March 11, 2016 "Environmental Review Update Checklist for projects with Previously Approved Environmental Documents".

IV. BIOLOGICAL RESOURCES

COMMENT: Assuming grading occurs on our property, the EIR should analyze impacts to biological resources occurring on our property.

V. CULTURAL RESOURCES

COMMENT: Assuming grading occurs on our property, the EIR should analyze impacts to cultural resources occurring on our property.

IX. HYDROLOGY AND WATER QUALITY

COMMENT: Assuming grading occurs on our property or project storm water is otherwise discharged onto our property, the EIR should analyze: 1) existing natural drainage patterns to proposed improved drainage patterns; 2) existing water volume discharged onto our property to proposed water volume to be discharged on our property; 3) alternative discharge locations; and 4) adequacy of proposed methods for assuring any altered water discharge patterns onto our property do no result in exceedances of applicable federal, state and local water quality standards.

X. LAND USE AND PLANNING

COMMENT: The EIR should analyze compatibility of residential uses with adjoining undeveloped non-residential properties.

XII. NOISE

COMMENT: The EIR should analyze impacts to setbacks and restrictions that would be imposed on neighboring properties due to proximity of residential receptors to the adjoining non-residential properties.

Kelly Bray
Re: Otay 250- Sunroad East Otay Mesa Business Park Specific Plan Amendment
April 11, 2016
Page Two

XVI. TRANSPORTATION/TRAFFIC

COMMENT: The EIR should analyze alternative alignments of Zinser Road and Harvest Road. See attached.

If you have any questions or require clarification to these comments, please contact the undersigned at your convenience.

Sincerely,
MARATHON LAND & CATTLE COMPANY



Mark Kennedy
Corporate Counsel
mark@marathonsd.com



401 B Street, Suite 800
San Diego, CA 92101-4231
(619) 699-1900
Fax (619) 699-1905
sandag.org

April 11, 2016

File Number 3300300

Ms. Kelly Bray
County of San Diego
Planning & Development Services
5510 Overland Avenue
San Diego, CA 92123

MEMBER AGENCIES

Cities of
Carlsbad
Chula Vista
Coronado
Del Mar
El Cajon
Encinitas
Escondido
Imperial Beach
La Mesa
Lemon Grove
National City
Oceanside
Poway
San Diego
San Marcos
Santee
Solana Beach
Vista
and
County of San Diego

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Metropolitan
Transit System
North County
Transit District
United States
Department of Defense
San Diego
Unified Port District
San Diego County
Water Authority
Southern California
Tribal Chairmen's Association
Mexico

Dear Ms. Bray:

SUBJECT: Otay 250 – Sunroad East Otay Mesa Business Park Specific Plan
Amendment Notice of Preparation

Thank you for the opportunity to comment on the Otay 250 – Sunroad East Otay Mesa Business Park Specific Plan Amendment. Our comments are based on policies included in San Diego Forward: The Regional Plan (Regional Plan), and are submitted from a regional perspective emphasizing the need for land use, transportation coordination, and implementation of smart growth and sustainable development principles. The Regional Plan sets forth a multimodal approach to meeting the region's transportation needs. Therefore, the San Diego Association of Governments (SANDAG) recommends the following issues be addressed:

Transportation Demand Management

Please consider incorporating Transportation Demand Management (TDM) measures into the Otay 250 – Sunroad East Otay Mesa Business Park to encourage the use of transportation alternatives and assist with reducing traffic congestion, parking demand, and greenhouse gas emissions in and around the proposed project area. Examples of TDM measures could include:

- Enhanced bicycle and pedestrian facilities that connect residents, tenants, and employees to nearby commercial areas, bikeways, and available transit services.
- Bicycle amenities, such as secure bicycle parking, locker rooms, and bicycle repair stands.
- Provision of bikeshare and carshare vehicles for residents and employees.
- Parking management strategies that encourage the use of transportation alternatives, including shared parking, priced parking, parking cash-out, unbundled parking, and priority parking for carpools and vanpools at employment sites.
- Subsidize transit passes for residents and employees given the close proximity to the forthcoming South Bay Bus Rapid Transit service.

- Coordinate with the regional TDM program, iCommute, to promote commuter programs and services to residents and employees, such as the SANDAG vanpool program, online ridematching and trip planning services, multi-modal trip planning, and the Guaranteed Ride Home service. Designate Transportation Coordinators at employment sites to promote, manage, and monitor these commuter programs.

Information on programs mentioned above can be accessed through iCommuteSD.com, and the SANDAG TDM division can assist with integration of TDM programs for this project.

Other Considerations

We encourage, where appropriate, consideration of the following tools in evaluating this project based on these SANDAG publications (which can be found on our website at sandag.org/igr).

1. SANDAG Regional Parking Management Toolbox
2. Riding to 2050, the San Diego Regional Bike Plan
3. Regional Multimodal Transportation Analysis: Alternative Approaches for Preparing Multimodal Transportation Analysis in Environmental Impact Reports
4. Planning and Designing for Pedestrians, Model Guidelines for the San Diego Region

When available, please send the Notice of Availability of the Draft Environmental Impact Report to:

Intergovernmental Review
c/o SANDAG
401 B Street, Suite 800
San Diego, CA 92101

We appreciate the opportunity to comment on the Otay 250 – Sunroad East Otay Mesa Business Park Specific Plan Amendment. If you have any questions, please contact me at (619) 699-1943 or via email at susan.baldwin@sandag.org.

Sincerely,



SUSAN B. BALDWIN, AICP
Senior Regional Planner

SBA/KHE/tak

From: Thomas Ammon tammon@san.rr.com
Subject: Otay Sunroad project question
Date: March 19, 2016 at 7:21 PM
To: Bray, Kelly Kelly.Bray@sdcounty.ca.gov



Thank you for providing the opportunity to comment on the updated checklist for this project. From the references cited section of the checklist it appears that the sole reference used to assess cultural resources impacts for the project dates back to 2008. This report is dated and outside of the 'five year standard' used in cultural resources studies. I am requesting that new surveys be conducted for the project. This standard is enforced in the County's own cultural resources guidelines on Page three where it states that surveys five years or less may be used to support environmental documents.

Sincerely,
Thomas D. Ammon

VIEJAS

TRIBAL GOVERNMENT

P.O. Box 908
Alpine, CA 91903
#1 Viejas Grade Road
Alpine, CA 91901

Phone: 6194453810
Fax: 6194455337
viejas.com

April 5, 2016

Kelly Bray
5510 Overland Ave., Suite 310
San Diego, CA 92123

RE: Sunroad East Otay Mesa

Dear Ms. Bray,

The Viejas Band of Kumeyaay Indians ("Viejas") has reviewed the proposed projects and at this time we have determined that the project site has cultural significance or ties to Viejas. Viejas Band request that a Native American Cultural Monitor be on the site for ground disturbing activities to inform us of any new developments such as inadvertent discovery of cultural artifacts, cremation sites, or human remains. Please call Julie Hagen for any questions at 619-659-2339 or email jhagen@viejas-nsn.gov. Thank you

Sincerely,

VIEJAS BAND OF KUMEYAAY INDIANS