EAST OTAY MESA SPECIFIC PLAN FINAL EIR



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Date Prepared: February 17, 1994

Date Revised by Planning Commission: April 15, 1994

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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:

- Biological Resources
- Noise b.

Significant And mitigable:

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

FINAL EIR

-2- Date Prepared: February 17, 1994
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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: [Date to be filled in after Board of Supervisors action]

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

-3- Date Prepared: February 17, 1994 Date Revised by Planning Commission: April 15, 1994

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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, 5510 Morehouse Drive, San Diego, California 92121

for: The County of San Diego, Department of Planning and Land Use, 5201 Ruffin Road, Suite B, San Diego, California 92123

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. <u>Land Use</u> (Significant And Mitigable)

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

<u>Discussion</u>: 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, P88-020W¹, 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 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)

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

<u>Discussion</u>: 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. <u>Biological Resources</u> (Significant But Not Mitigable)

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

<u>Discussion</u>: 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/op en space easements.	Significant But Not Mitigable if not preserved.
Sensitive animal species - Western spadefoot toad, Burrowing owl, raptors, vernal pool species.	Avoidance/preservation/op en 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.

<u>Mitigating Measures</u>: 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.
 - 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.
- 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.
- 31. 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.
 - 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. <u>Cultural Resources</u> (Significant And Mitigable)

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

<u>Discussion</u>: 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.

<u>Mitigating Measures</u>: 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)

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

<u>Discussion</u>: 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)

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

<u>Discussion</u>: 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 onsite 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. <u>Transportation and Circulation</u> (Significant And Mitigable)

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

<u>Discussion</u>: 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.

8. Noise (Significant But Not Mitigable)

<u>Finding</u>: There would be a significant but not mitigable environmental impact to noise sensitive receptors adjacent to certain roadways, and significant but not mitigable noise impacts to California gnatcatcher habitat where it is adjacent to noise generators.

<u>Discussion</u>: 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.

<u>Mitigating Measures</u>: 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)

<u>Finding</u>: 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)

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

<u>Discussion</u>: 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)

Einding: 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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LETTERS OF AND RESPONSES TO PUBLIC AND OTHER AGENCY COMMENTS

PROJECT: East Otay Mesa Specific Plan PERMIT: GPA 94-02

LOG #: 93-19-6

During the 60 day review period, commencing November 16, 1993 and ending January 17, 1994, 17 letters of public comment were received. In addition, one letter was received on January 25, 1994, from the U.S. Fish and Wildlife Service, after the close of the public review period:

- A. On December 3, 1993, the Department of the Treasury, U.S. Customs Service responded with the following concerns:
 - 1. A comment was made by the Department of the Treasury that the Customs Service could not respond to the proposal for a new U.S./Mexico Port of Entry until a future time.
 - Department Response: Comment so noted. A new Port of Entry is not being proposed at the present, but identification of a potential location for a Port of Entry was identified in the Specific Plan.
 - 2. The Department of the Treasury, U.S. Customs Service, stated that traffic volumes will cumulatively increase with implementation of this project, and with other projects proposed in the area.
 - Department Response: Comment so noted. This is discussed in detail in the East Otay Mesa Specific Plan Draft Circulation Element, prepared by Kimley-Horn and Associates, Inc., in the appendices of the draft EIR. Phasing of traffic improvements will occur during implementation of the Plan, and coordination with the California Department of Transportation for future construction of SR 905 and SR 125 is an on-going process.
- B. On December 15, 1993, Andrew B. Campbell, Kathryn Campbell, and Wallace E. Wetmore responded with the following concerns:
 - 1. A road, known as Paseo de las Americas, is shown in the Specific Plan as resulting in the removal of two homes, and as deviating from its current alignment.

Department Response: Detailed engineering drawings are available at the Department of Planning and Land Use which indicate that neither home

would be affected by the realignment of Paseo de las Americas. The scale of the maps in the Specific Plan does not indicate precise road alignments.

- C. On December 27, 1993, John M. Shaw of Rancon Realty Funds responded with the following comments:
 - Reference is made in the draft EIR for mitigation of impacts to vernal pools on the Rancon property, known as the J-22 Complex. The mitigation calls for 100 percent retention of the Complex, which is not what Rancon feels has been negotiated with the County in a letter to them of September 29, 1993.

Department Response: As noted in the letter from the County of San Diego to Rancon of September 29, 1993 (copy attached), it was agreed that the area north of Lone Star Road would remain undeveloped due to the presence of vernal pools, cultural resource sites, wetlands, and steep slopes. Regarding the area south of Lone Star Road:

"The area southwest of Lone Star Road may be allowed to develop in accordance with the Specific Plan [Department of Planning and Land Use emphasis], subject to the following restrictions proposed by Rancon, and any other mitigation measures that may be required by other resource agencies."

Since Rancon has not submitted detailed development plans, a final mitigation agreement cannot yet be consummated. Once development plans are submitted, Rancon must confer with the County and the relevant State and Federal agencies to work out a final mitigation plan.

Ogden Environmental, the environmental consultant for the County, identified the need to preserve the pools northwest of Lone Star Road, and that impacts to the pools southwest of Lone Star Road would not be mitigable. Final details will be worked out between Rancon, the County, and other resource agencies once development plans are submitted.

- D. On December 29, 1993, the International Boundary and Water Commission responded with the following concerns:
 - 1. Concern was stated that the Specific Plan does not reference Boundary Monument No. 252, although the draft EIR does so reference it. It was suggested that the Specific Plan be amended to provide a precautionary measure to ensure that the border zone not be disturbed, and that a fence be constructed five feet from the international boundary line.

Department Response: No revisions are necessary to the draft EIR. The issues related to the protection of the Boundary Monument, the fence, and buffer zones/easements from the international boundary are planning issues, and do not directly relate to the draft EIR. However, the Specific Plan provides a minimum 30 foot access easement along the border. Fences and other improvements will not be allowed in the easement.

2. Water quality and runoff impacts within the Mexican watershed are of concern to the International Boundary and Water Commission, in that previous detention basins constructed for other projects have not been adequate to control southward flows into Mexico.

Department Response: Construction and maintenance of on-site detention facilities are the responsibility of each property owner. Construction of detention facilities will be funded and maintained though a local improvement district, and assessments will be levied on benefiting properties by the County Flood Control District. The Flood Control Section of the Department of Public Works is responsible for approval of any proposed detention facilities on a case-by-case basis. Storm water drainage policies are addressed in the Specific Plan, and also in the Comprehensive Flood Control Master Plan.

3. Concern was expressed about the location of possible wastewater treatment plants, relative to the international boundary.

Department Response: The sanitation district that will be formed will coordinate with the International Boundary and Water Commission as to the location of facilities at the appropriate time in the future.

4. The International Boundary and Water Commission expressed preference for the Environmentally Preferred Alternative as it relates to boundary issues.

Department Response: Comment so noted.

5. It was noted that two names were used for a previously approved project in the Specific Plan Area: American International Raceway, and San Diego International Raceway.

Department Response: Comment so noted, as these names are used interchangeably.

6. References in the EIR about grading guidelines in the Specific Plan are incorrect. Grading guidelines are now in Section 1.1 of the Site Planning and Design Guidelines of the Specific Plan.

Department Response: Comment so noted; this change was made in the Specific Plan text after the draft EIR had been finalized.

7. On Page 4.6-8, change "U.S. section" to U.S. Section.

Department Response: Comment so noted.

- 8. The final comments of the International Boundary and Water Commission are related to the Draft Site Planning and Design Guidelines, and the Specific Plan text. These will not be addressed here, since they are not environmental issues. They will, however, be addressed in the staff report and at public hearings. It is not necessary to list all agencies that will be reviewing subsequent implementing actions, because all affected agencies will be notified at the time of the new proposal.
- E. On January 7, 1994, the State of California, Office of Planning and Research, Department of Fish and Game, responded with the following concerns:
 - 1. The Department of Fish and Game states that the Plan does not take into account the on-going efforts of the regional habitat planning programs, specifically the MSCP and NCCP programs. They are also concerned that the draft EIR does not address project impacts and mitigation relative to these planning efforts.

Department Response: The draft EIR does, in several locations, reference the regional MSCP and NCCP programs. It states that the loss of sensitive habitat in the Specific Plan Area, on a worst case basis, would result in significant and not mitigable biological impacts.

In addition, both the MSCP and the NCCP are on-going programs, and the specific requirements of these programs for the regional habitat management plan and for the creation of subarea plans have yet to be developed. Finally, the preparation of resource conservation plans prior to any development in environmentally sensitive areas is a requirement of the project.

2. Fish and Game is concerned that the low density residential designations will not ensure preservation of high resource value areas.

Department Response: High resource value areas have been identified by biologists, and a "G" Special Area Designator has been applied to those areas. This will ensure that the resource conservation plan referred to above is carried out prior to allowing any development in these areas when implementing permits are requested.

3. Fish and Game is also concerned about the consistency of mitigation for preservation of sensitive resource areas, specifically as they relate to the areas designated for industrial and commercial uses.

Department Response: The wording in the draft EIR was ambiguous. The intent is that any sensitive resource areas that may be impacted in the industrial and commercial designations would be mitigated, as a first priority, in those areas and within the Specific Plan Area. If that is not possible, then the preferred method of mitigation would be within the Specific Plan Area, and would probably occur in the areas identified for residential use with the "G" Designator.

4. Impacts to vernal pools are not sufficiently mitigated, according to Fish and Game, as grading and hydrological impacts need to be addressed.

Avoidance, preservation, and management is recommended.

Department Response: Impacts to vernal pools will be addressed at time of permit application by individual property owners. The draft EIR identifies the locations of vernal pools within the Specific Plan Area, and recommends consultation with local, State, and Federal resource agencies at the time of permit application. Project specific impacts cannot be identified at this time, since no development projects have yet been proposed. In addition, placement of the "G" Designator on these properties will require closer examination of these areas when property owners apply for permits.

5. Fish and Game would like to see the regional corridor analysis take into account multiple species, not only large mammals and gnatcatchers.

Department Response: The discussion about wildlife corridors does take into account multiple species, and wildlife corridors are discussed in a number of places throughout the text of the biological technical report. The biologists from Ogden Environmental did a detailed, habitat-by-habitat and sensitive species-by-species analysis of the Specific Plan Area, and recognized the importance of local and regional wildlife corridors.

- 6. Fish and Game would like to learn more about the sensitive resource area regulations ("G" Designator) and resource conservation plans to incorporate sensitive species and habitats into the County Zoning Ordinance.
 - Department Response: Basically, for areas that have been identified as environmentally sensitive, the "G" Designator requires review of projects at the discretionary level to formulate mitigation strategies and address impacts to habitat and sensitive species. It also requires preparation of resource conservation plans prior to development of areas with a "G" Designator. In addition, the County Resource Protection Ordinance (RPO) and Board of Supervisors Policy I-73 (Hillside Development) further implement The Zoning Ordinance by regulating development on steep slopes and biologically sensitive areas.
- 7. Fish and Game indicates that the Conservation and Open Space Policies section of the Specific Plan does not include verbiage about coordination with regional conservation efforts (the NCCP and the MSCP).
 - Department Response: The intent of the Resource Conservation Plan identified in the draft EIR and the Specific Plan is that the Resource Conservation Plan be the functional equivalent of a subarea plan, which is one component of an NCCP or MSCP. Since the requirements for subarea plans have not yet been precisely defined by the State and Federal resource agencies, the Resource Conservation Plan will formulate strategies and identify impacts to sensitive habitat and species acceptable to other resource agencies.
- F. On January 4, 1994, the County of San Diego, Department of Public Works responded with the following comments:
 - 1. In regard to traffic, the Department of Public Works requested that the draft EIR be submitted to CalTrans and the City of San Diego for review and comment.
 - Department Response: Coordination was achieved with CalTrans and the City of San Diego during the preparation of the traffic report, and copies of the draft EIR have been provided to these agencies.
 - 2. The Department of Public Works noted that a General Plan Amendment will be needed for revisions to Circulation Element roads, and that all public roads must be constructed to the satisfaction of the Director of Public Works.

- Department Response: Comment so noted; revisions to the Circulation Element are proposed as part of GPA 94-02.
- 3. The Department of Public Works commented that surface waters are beneficial to rare and endangered species, and stated that they believe that East Otay Mesa does not have such species.
 - Department Response: As noted in the biological section of the draft EIR and the biological technical report, the project area does contain sensitive habitat and species.
- 4. Items #2, #3, #4, and #5 of the Department of Public Works letter were minor wording revisions that the Flood Control Section of the Department of Public Works would like to incorporate into the draft EIR.
 - Department Response: The Department of Planning and Land Use concurs with these changes.
- 5. The Department of Public Works notes that sediment impacts from the project to the Otay River and San Diego Bay will be minor (Item #6).
 - Department Response: The Department of Planning and Land Use concurs.
- 6. Items #7, #8, and #9 of the Department of Public Works letter were also minor wording revisions that the Flood Control Section would like to incorporate into the draft EIR.
 - Department Response: The Department of Planning and Land Use concurs with these revisions.
- G. On January 11, 1994, the San Diego County Archaeological Society (SDCAS), Inc., responded with the following concerns:
 - 1. The SDCAS would like guidelines to be established for resurveying properties that would be developed at a later time, on the order of five years (in other words, new surveys would need to be done if properties are not developed in five years).
 - Department Response: As property owners apply for permits, the need for archaeological survey and testing will be addressed by the Department of Planning and Land Use archaeologists on a case-by-case basis. At this point, a very thorough survey has been conducted by Ogden Environmental,

with the exception of 400 acres identified in the text, so we would anticipate that no additional surveys would need to be conducted in the future.

2. The SDCAS noted that a few reports of previous research in the area were not cited.

Department Response: Comment so noted.

3. The SDCAS states that it is unclear whether the Tax Factor photographs were used in the research.

Department Response: The Tax Factor photographs were used.

4. The SDCAS noted that the EIR provided a good perspective on the potential of archaeological sites to be considered as a district.

Department Response: Once additional sites are tested, the potential of significant sites, if they are located in close proximity to each other, could be considered as an archaeological district at that time.

5. The SDCAS is in favor of the concept of a cultural resource museum for the Otay Mesa area.

Department Response: The Department of Planning and Land Use concurs; this concept may be explored in more detail as development plans are processed in the Specific Plan Area, and as more archaeological research is conducted in the area.

- H. On January 13, 1994, the California Department of Transportation (CalTrans) responded with the following concerns:
 - 1. CalTrans states that the possible extension of SR 905 would be a new State Highway from Route 905/125 interchange to a possible new Port of Entry into Mexico.

Department Response: Comment so noted.

 CalTrans would like clarification on the status of SR 125, in that it is planned for eight lanes, and two high occupancy vehicle lanes or light rail transit. Construction could begin in 1996 and be completed in 1998. CalTrans is the lead on SR 125 studies. Also, their August 1993 study eliminated Alternative S-1 through Johnson Canyon due to sensitive biological resources. Department Response: Comments so noted.

3. CalTrans provided several comments on the Specific Plan Area.

Department Response: These comments will be responded to separately from the draft EIR, and corrections have been made to the Specific Plan.

- I. On January 13, 1994, the Otay Valley Regional Park Joint Staff responded with the following concerns:
 - 1. The Park Joint Staff provided two and one-half pages of general comments and recommendations about the Specific Plan and the draft Site Planning and Design Guidelines.

Department Response: These comments will be responded to separately from the draft EIR, as they are not environmental issues.

2. The Park Joint Staff favors the Environmentally Preferred Alternative, as it has less impacts to Johnson and O'Neal Canyons and to Otay Valley Regional Park.

Department Response: The Environmentally Preferred Alternative would have less biological impacts, and thus presumably less impacts to the proposed Otay Valley Regional Park.

3. The Park Joint Staff would like to revise the report to reflect changes previously recommended for trails.

Department Response: Trails are addressed in the Specific Plan, and, if proposed in the future, would be subject to the environmental review process.

4. The Park Joint Staff would like a special designation of residential/open space and/or industrial/open space to be incorporated into the document.

Department Response: The biologically important areas have been identified with a "G" Designator to recognize the biological sensitivity of these areas. As projects are proposed in the future, a Site Plan and a Resource Conservation Plan will need to be prepared to address conservation of open space and protection of sensitive species. Development potential in these areas is very low, with a maximum density of 1 dwelling unit per 20 acres.

- J. On January 13, 1994, a more detailed letter was received from the Otay Valley Regional Park Joint Staff (Executive Committee and Citizens Committee), with the following concerns:
 - 1. The Park Joint Staff provided three pages of comments on the Specific Plan and the Site Planning and Design Guidelines.
 - Department Response: These comments will be responded to separately from the draft EIR, as they are not environmental issues.
 - 2. Concern was expressed by the Park Joint Staff about trail alignments in Johnson Canyon.
 - Department Response: Exact locations of trail alignments have not yet been determined, and will be addressed at the time that trails are proposed.
 - 3. The Park Joint Staff takes issue with the proposed mitigation measure on Page 4.1-35 (#8) that the County will re-evaluate which type of land use is appropriate for Johnson Canyon at a future time.
 - Department Response: A very small portion of Johnson Canyon is within the Specific Plan Area, and that area has been identified for hillside residential uses. Due to the steep slopes and sensitive biological resources, it is likely that only the flat portion of the mesa will be developed with residential uses, and the remainder will become dedicated open space.
 - 4. Comment was made that landform alteration impacts are not adequately addressed to the upper portion of Johnson Canyon due to future industrial development.
 - Department Response: The specific boundaries for Johnson Canyon have been defined as the top of the canyon slopes, and no development will be allowed below this area. As no project has been proposed in this area, specific landform alteration impacts will be addressed at the time of permit application.
 - 5. The Park Joint Staff would like the trail corridors through Johnson and O'Neal Canyons to be added to the circulation and transit plans.
 - Department Response: Comment so noted; however, this area is outside the Specific Plan Area boundaries.

6. The Otay Valley Regional Park proposed boundary runs into the southern end of Johnson Canyon.

Department Response: Comment so noted.

7. The Park Joint Staff have concerns about placement of trails.

Department Response: See Response J.2. above.

8. The Park Joint Staff pointed out an apparent inconsistency between the types of land uses proposed in the northern part of the Specific Plan Area.

Department Response: See Response J.3. above.

9. Comment was made that landform alteration and visual impacts were not adequately addressed on Page 4.2-17 of the draft EIR.

Department Response: See Response J.3. above.

10. The Park Joint Staff would like to a statement added to encourage walking between the Specific Plan Area and the proposed Otay Valley Regional Park trail systems.

Department Response: Comment so noted.

11. The Park Joint Staff notes inconsistencies between maps indicating the locations of the "G" Designator in the hillside residential district, as it appears not to have been identified in the residential area adjacent to Johnson Canyon.

Department Response: The "G" Special Area Designator is only intended for biologically sensitive land. The properties in Johnson Canyon that contain steep slopes are not within the biologically sensitive areas.

12. A question was raised as to whether Alta Road has been designated as a Prime Arterial in the Circulation Element.

Department Response: Alta Road has been designated as a Prime Arterial in the Circulation Element.

13. The Park Joint Staff noted that the Focused Planning Area boundary of Johnson Canyon is not on the map in Figure 4.1.9.

Department Response: That is incorrect, as the Focused Planning Area boundary is indicated on the map.

14. No mitigation is offered for the hillside residential and industrial development impacts on the Otay Valley Regional Park.

Department Response: See Response J.4. above.

15. A comment was made that the visual impacts of residential and industrial development on the Otay Valley Regional Park are not addressed.

Department Response: See Response J.4. above.

16. No mention was made about the Olympic Training Center and associated facilities, according to the Park Joint Staff.

Department Response: Comment so noted.

- K. On January 14, 1994, comments were provided by the City of San Diego with the following concerns:
 - 1. The City states that there are inconsistencies between the Specific Plan Area and the Otay Valley Regional Park Progress Plan.

Department Response: The Progress Plan for the Park is a generalized map that identifies potential locations for future facilities, including trails, vista points, interpretive centers, etc. A plan for future development of the Park has not been adopted by any of the member agencies, nor has any land acquisition taken place. As such, in the process of developing the Park plan, Park staff will need to take into account the East Otay Mesa Specific Plan Area in their development plans.

2. The City indicates that a comprehensive open space system was omitted from discussion.

Department Response: Areas for future open space have been identified in the Specific Plan and draft EIR, and these areas have had a "G" Sensitive Area Designator placed upon them. This means that in the future when property owners apply for permits, potential areas for development and potential areas for open space uses will be identified. In addition, property owners are required to prepare Resource Conservation Plans prior to development, which will also address open space issues during the implementing permit stage.

3. The City does not agree with some of the assumptions and mitigation measures proposed to mitigate traffic impacts.

Department Response: This is addressed under Item K. 18.-33. below.

4. Regarding hydrology and flood control, the City is concerned that additional areas will drain toward City boundaries, thus exacerbating an existing drainage problem in the City.

Department Response: Provisions have been made, as individual projects come on line, to construct detention facilities, storm drain facilities, energy dissipaters, and erosion control devices to ensure that runoff does not cause downstream impacts, as required in the Specific Plan Flood Control Master Plan.

5. The City does not believe that all reasonable alternatives have been considered, and would like to have another environmentally sensitive alternative to balance the land uses that are proposed (add residential uses, delete some industrial and commercial uses).

Department Response: Pursuant to Section 15126(d)(5) of the State CEQA Guidelines, we quote:

The range of alternatives required in an EIR is governed by "rule of reason" that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. The key issue is whether the selection and discussion of alternatives fosters informed decision making and informed public participation.

6. The City noted that a Mitigation Monitoring and Reporting Program, required pursuant to Public Resources Code Section 21081.6, has been omitted from the draft EIR.

Department Response: We concur. A Mitigation and Monitoring Plan has now been provided as Attachment D of the final EIR.

7. The City would like areas within the Focused Planning Area of the Otay Valley River Park designated as open space.

Department Response: See Response K.2. above.

8. The City identified a number of comments on the Specific Plan and the Site Planning and Design Guidelines.

Department Response: These items will not be addressed, since they are not environmental issues.

9. The City noted that significant impacts have been identified to the future Otay Valley Regional Park, and to sensitive habitat and sensitive species in the area.

Department Response: Comment so noted. Biological impacts identified in the draft EIR have been addressed as significant and not mitigable.

10. The City of San Diego favors the Environmentally Preferred Alternative.

Department Response: Comment so noted.

11. The City would like more information regarding the trail system.

Department Response: See Response I.3. and J.2. above.

12. The City pointed out inconsistencies in the language between the types of land uses proposed in the northern part of the Specific Plan Area.

Department Response: See Response I.4. above.

13. The City of San Diego states that the draft EIR does not adequately address landform alteration and visual impacts to Johnson Canyon.

Department Response: See Response J.3. above.

14. The City would like to encourage pedestrian access to the Otay Valley Regional Park trail systems.

Department Response: See Response J.10. above.

15. Language related to hillside residential uses, the "G" Designator, and open space are confusing, according to the City of San Diego.

Department Response: See Response J.11. above.

16. The trail connections to Johnson and O'Neal Canyons should be added to the circulation and transit plan.

Department Response: See Response J.5. above.

17. The City noted that the Otay Valley Regional Park also includes the southern end of Johnson Canyon and the major portion of O'Neal Canyon.

Department Response: Comment so noted.

18. The City of San Diego would like a trip generation table included in the report.

Department Response: A trip generation table has been prepared and is presented as Attachment E of the final EIR.

19. The recommended widening of City streets east of SR-125 corridor in Otay Mesa is not acceptable to the City of San Diego as a mitigation measure for the proposed East Otay Mesa development. The proposed development density should be reduced to a level which can be incorporated into the neighboring communities' approved street circulation system.

Department Response: Yes, the East Mesa Specific Plan is recommending the reclassification of Otay Mesa Road between Piper Ranch Road and Paseo De Las Americas. This recommendation is made to serve the high volumes associated with the relocation of the SR-125 and SR-905 interchange and its direct connection to Otay Mesa Road just west of Harvest Road. The additional right-of-way required for the proposed widening will come from the North side of the road within the jurisdiction of the County. The required upgrading of these segments Otay Mesa Road is not the result of the land use plans by the County alone, but the combination of land use and the relocation of the SR-125 and SR-905 interchange.

20. In Figure 4, the projected average daily traffic volume for SR-905 just east of SR-125 corridor is higher than the City's previous projections. The volumes shown in this draft circulation element indicate the freeway would be over capacity. Also, the projected average daily traffic volume for SR-125 should be reduced and reallocated to other routes to reflect satisfactory levels of service on the proposed private toll facility.

Department Response: The current planning and forecasting efforts for SR-125 as well as the transportation analysis performed for the Otay Ranch included SR-905 as a 10 lane freeway. The modeling efforts conducted by the City of San Diego may have considered SR-905 as a 6 lane freeway in 1988 when the community plan was

updated, but increased Port of Entry activity and the land use in the Otay Ranch will require a 8 to 10 lane facility. To date no properties along the route have dedicated right way for SR-905. This situation will allow for the future purchase of the R.O.W. required for a 8 or 10 lane freeway.

The toll condition on SR-125 was not assumed at buildout. The long range plan for SR-125 is to revert it to a public, non-toll facility after 35 years. The buildout time frame for the Otay Mesa is 50 years. The impacts of SR-125 as a toll facility could be measured in a "phased" scenario, but the problem is what level of development to assume. The purpose of our buildout forecast was to identify the appropriate road classifications for the circulation element. The interim effects of diversion due to the toll road will be measured incrementally as individual projects on the East Mesa are submitted. The policies of the East Otay Mesa SPA require project level traffic analysis.

21. Table 2, Note E should be revised in the traffic report.

Department Response: Comment so noted. This change will be made.

22. The City does not agree with the downgrading of Piper Ranch Road.

Department Response: The text on page III-16 will be amended to show Siempre Viva Road as a 6 lane prime arterial. We concur, the classification of Piper Ranch Road as a 2 lane industrial collector road would be inappropriate. The forecasted volumes of 8,000 to 15,000 ADT will require 4 travel lanes. Based on forecasted volumes the recommended 4 lane industrial collector classification is a more appropriate classification than a Major Road. We recommend that the City change it's classification to be consistent with the East Otay Mesa SPA.

Figure 6 will be amended to depict Piper Ranch Road as a Major Road between Otay Mesa Road and Airway Road.

23. The City of San Diego would like the roadway classifications revised as shown on Figure 6.

Department Response: Appropriate revisions will be made.

24. The widening of Otay Mesa Road would provide additional capacity, and this should be omitted from the Transportation Phasing Plan.

Department Response: Recent traffic counts on Otay Mesa Road indicate that excess capacity, if any, created by widening Otay Mesa Road to six lanes would not be as great as indicated in the draft Circulation Element. Only minor and interim uses could be accommodated in East Otay Mesa if the only improvement in the SR 905 corridor included the widening of Otay Mesa Road to six lanes.

25. The City made suggestions for roadway improvements in Phase 1 development.

Department Response: The suggested revisions will be made.

26. The City would like to add more roadways to the traffic monitoring program.

Department Response: The proposed monitoring program is, for purposes of isolating trip making quantities, attributable to land uses in the County. Accordingly, monitoring stations would be located in the western boundary between City and County jurisdiction.

27. The City would like to make the traffic analysis comply with the Congestion Management Program.

Department Response: The traffic analysis does comply with the Congestion Management Program.

28. The City states that in Appendix A, Page 5, Scenario 1-A would be acceptable if SR 905 is widened.

Department Response: Scenario 1-A, as presented, provides adequate capacity for Phase 1 development.

29. The City made similar comments regarding Scenario 1-B.

Department Response: Our report omitted the analysis that was performed on that intersection. The figure is also not representative of the analysis conducted. We are amending the report text and graphics to show a grade separation at this intersection.

30. The City made similar comments regarding Scenario II.

Department Response: Comment so noted.

31. The City made similar comments about Scenario III.

Department Response: Comment so noted.

32. The City commented about development rights between City of San Diego and County of San Diego jurisdiction.

Department Response: The division of development rights is not the purpose of the Phasing Plans presented in the Draft Circulation Element. The division of acreage between the city and county is for the purpose of financing the costs of constructing the First Phase only. The document is not proposing any division of development rights on the Otay Mesa.

33. The City would like to see the increase in border traffic be accounted for in the Transportation Phasing Plan.

Department Response: We agree that traffic across the border at Otay Mesa will increase, although it is unlikely that an annual growth rate of 18 percent can be sustained over a long period of time. Nonetheless, continued increase in cross border traffic is expected. Accordingly, the expeditious development of SR 905 is encouraged, along with other roadways to serve the Otay Mesa area.

34. The City supplied two pages entitled <u>Proposed Specific Plan Land Use Concepts</u>, all of which are planning related issues.

Department Response: These issues will be addressed separately, as they are not environmental issues.

- L. On January 13, 1994, the Otay Water District responded with the following concerns:
 - 1. The District would like the EIR and Specific Plan to indicate that the District is in the process of updating their Water Resources Master Plan, and that the information indicated in the present documents may differ from that to be produced for their Master Plan.

Department Response: Comment so noted.

- M. On January 14, 1994, the City of Chula Vista Planning Department responded with the following concerns:
 - 1. The City of Chula Vista states that the EIR is a program level EIR, and, as such, must evaluate the worst case analysis, identify standards for

mitigation of impacts, and then identify specific mitigation measures to avoid impacts.

Department Response: The draft EIR did evaluate a worst case analysis, and discussed in detail four different alternatives: the No Project Alternative, the East Otay Mesa Specific Plan, the Existing Otay Subregional Plan Alternative, and an Environmentally Preferred Alternative. Mitigation measures were identified to alleviate impacts for all of these alternatives, and, for issues where impacts were identified as not being able to be fully mitigated (biology and noise), it was so stated.

2. The City of Chula Vista states that the term "potential" should be deleted as it relates to environmental impacts, and that impacts should be quantified now. They also stated that at a later date, some impacts may be able to be mitigated through subsequent environmental review.

Department Response: The EIR did quantify the level of environmental impacts. It identified impacts on an issue-by-issue basis as either significant and not mitigable, significant and mitigable, or as not significant. It is true that at a later stage of development, and through the preparation of a subsequent environmental document, that the level of impacts of some issues may be reduced to insignificant. However, given that no discretionary projects are presently proposed, the evaluation of impacts at the Specific Plan level was done on a worst case basis. The City of Chula Vista is correct in that the phrase "potential", where used in conjunction with evaluation of impacts, should be eliminated.

3. The City of Chula Vista stated that the County should have considered alternate sites for the project, as required under a court ruling in the Goleta case.

Department Response: The East Otay Mesa Specific Plan has been prepared to plan for the development of appropriate land uses on a specific site. The CEQA Guidelines Section 15126(d) requires an EIR to describe a range of reasonable alternatives to the proposed project, or to its location, that could feasibly attain the project's basic objectives. The project's basic objective is to plan for the development of the East Otay Mesa, and the draft EIR does describe three on-site alternatives to the proposed project. We do not believe the evaluation of off-site alternatives would provide any information related to the subject property which would be helpful to the lead agency in eliminating or reducing any significant adverse environmental effects on-site.

In 1983, the County adopted the Otay Subregional Plan as part of the Land Use Element of the San Diego County General Plan. In 1990, the Plan was amended to designate a portion of the East Otay Mesa as a Specific Plan Area. Alternative land uses for the East Otay Mesa, and for industrial development within the unincorporated area of San Diego County, were considered at that time. Otay Subregional Plan Land Use Policy A.2.a. specifies that the Otay Mesa be treated as a single planning and development unit because the "Otay Mesa represents an unusual opportunity to plan a major regional and international industrial center in a comprehensive manner." The Subregional Plan calls for the preparation of the East Otay Mesa Specific Plan and sets forth Specific Plan guidelines.

The current project is an implementation of the Specific Plan requirement in the Otay Subregional Plan. The CEQA Guidelines Section 15126(d)(5) requires an EIR to set forth only those alternatives necessary to permit a reasoned choice. Here, the reasoned choice is limited to an on-site plan for the East Otay Mesa. The Goleta II decision to which you refer (Citizens of Goleta Valley v. Board of Supervisors [1990] 52 Cal. 3d 553) describes the two types of project alternatives at Page 566. The Supreme Court indicated that project alternatives typically fall into one of two categories: on-site alternatives, which generally consist of different uses of the land under consideration; and off-site alternatives, which usually involve similar uses at different locations. The Court found that the CEQA establishes no categorical legal imperative as to the scope of alternatives to be analyzed in an EIR, and that each case must be evaluated on its facts in light of the statutory purpose.

This case involves a decision on which on-site alternative, i.e., which use of the land, is best for the East Otay Mesa Specific Plan. We find that the three on-site alternatives set forth in the draft EIR set forth a reasonable range of alternatives under the CEQA that could feasibly obtain the objective of this project to plan for the development of the East Otay Mesa. We do not believe that a discussion of off-site alternatives, i.e., the discussion of similar uses at different locations, is required by the CEQA under the facts of this case which involve a specific land use decision for the East Otay Mesa.

4. The City of Chula Vista would like the traffic analysis to use the enhanced CEQA process as required by the Regional Growth Management Program.

Department Response: The analysis of traffic impacts to the region's transportation system is therefore assessed per the requirements set forth in

the County's Public Facilities Element (PFE) instead of referencing to the enhanced CEQA review.

Therefore, the County's Public Facilities Element impacts to the County Circulation Element roads are identified. This includes the regionally significant arterials as outlined in the CMP. For instance, impacts to I-805, SR-905, SR-125, Otay Mesa Road, and Otay Valley Road are identified. SANDAG'S South Bay Subregional Model was used for the analysis. Figure 4-A shows the build 24 hour volumes associated with the project. In no case does the project traffic alone reduce the level of service on any of the CMP facilities from "D" to "E", the County's PFE is satisfied. There are two locations where the total 24 hour volumes appear to exceed the threshold between "D" and "E", however the forecast does not reflect the trip reductions applied to the Phase II Progress Plan for TDM and Village Design. The application of TDM and Village Design trip reduction factors these volumes would be reduced and the level of service would be "D".

5. There is not an implementation program in the draft EIR as it relates to policies in the Circulation Element.

Department Response: The Circulation Element Polices established and adopted in the 1993 update of the plan, reference a regional financing plan that has yet to be developed. When a regional plan that includes the three jurisdictions in the South Bay, (City of San Diego, City of Chula Vista and the County) this project will be required to participate.

6. The City of Chula Vista would like a wording change for Mitigation Measure #2 on Page 4.7-28.

Department Response: Comment so noted.

7. The City notes that transportation improvements for on- and off-site roads have not identified any funding sources.

Department Response: The text of the Specific Plan clearly identifies the responsibility for on-site improvements as the project's. The issue of off-site regional improvements was discussed in a previous comment.

8. The alignment of SR 125 is different from that shown on the Otay Ranch General Development Plan.

Department Response: The alignment shown is that preferred by CalTrans and other agencies at the present time.

9. The ADT on Otay Valley Road east of I-805 should be updated.

Department Response: Comment so noted.

10. The City of Chula Vista uses Level of Service (LOS) "C" ADT only as a recommended design capacity.

Department Response: Comment so noted.

11. Otay Valley Road between I-805 and Nirvana Street is under construction as a six lane Major Road.

Department Response: Comment so noted.

12. The volume on La Media Road north of Lone Star Road is projected to be over the LOS "C" criteria that the City of Chula Vista uses.

Department Response: The volume of 57,000 ADT on La Media is equivalent to a level of service of E; however, the base model used in the East Otay Mesa forecast was the Phase I Progress Plan from the Otay Ranch, and this volume is overstated. When the East Mesa modeling effort was conducted the Phase I Progress Plan was the preferred plan by the Otay Ranch project and was the latest available information at the time. The subsequent development of a less intensive Otay Ranch Phase II Progress Plan resulted in lower traffic volumes on La Media the Phase I Progress Plan. The County is now performing a final forecast merging the East Mesa SPA with the Phase II Progress Plan the results, which we expect to reduce the 57,000 volume to less than 55,000, and this will be incorporated in the Final EIR for the East Otay Mesa SPA.

13. On Page III-18, Figure 6, a number of corrections should be made.

Department Response: The suggested corrections will be made.

14. The possibility of not having Alta Road as a future river crossing should be discussed.

Department Response: Alta Road is a component of the Circulation Element, and is depicted as such in the draft Circulation Element. If, at

- some time in the future, traffic volumes are low, revisions can be made to the Circulation Element, deleting this section of the road.
- 15. The City of Chula Vista would like a discussion of the possibility of traffic using Heritage Road, north to Otay Valley Road, instead of the analysis of SR 905 to Heritage Road.
 - Department Response: When SR 905 is extended to Heritage Road, much of the traffic in the corridor will be on SR 905 instead of Otay Mesa Road. The SR 905 freeway alignment would be located south of Otay Mesa Road. An interchange and grade separation of Palm Avenue/SR 905 is planned.
- 16. The City of Chula Vista would like the Land Use section to provide a discussion of all discretionary actions required for project implementation.
 - Department Response: A discussion of regulatory provisions, including a description of the development review process, land use regulations, development standards, and Site Planning and Design Guidelines is found in the draft EIR on Pages 3-19 through 3-21. Figure 3-9 outlines a project review process to illustrate the various steps individual projects must undergo prior to implementation at the discretionary level. In addition, the discretionary actions required to implement the present project are addressed on Pages 3-21 and 3-22 of the draft EIR. It is not necessary to include all regulatory details in these documents since Countywide ordinances shall apply unless this area is specifically exempted.
- 17. The City of Chula Vista is concerned about the increase in industrially based land in the Otay Mesa and South Bay region of San Diego County. They state that a jobs/housing imbalance would result because of the decrease in residentially zoned land, and that no discussion has been provided about the cumulative land use imbalance that already exists on Otay Mesa. They would like to see a cumulative land use impact analysis of all existing and future growth in the South Bay region.

Department Response: The project will significantly contribute to an improvement in the jobs/housing balance in Major Statistical Area (MSA) 2, the MSA of the County in which this project lies. If all projects in the MSA are built as planned, the jobs/housing ratio will increase from .86 in 1990 to 1.38 at buildout (meaning from .86 jobs per housing unit to 1.38 jobs per housing unit). Given the residential uses proposed in the City of San Diego to the west, and the recently approved Otay Ranch project to the north, most of which is residentially based, the jobs to housing balance should improve significantly over the present situation.

18. The City of Chula Vista states that there are significant and unmitigated land use impacts between residential and other uses, policy inconsistencies with the Otay Subregional Plan regarding sensitive resources, and the goals and plans for the proposed Otay Valley Regional Park. They would also like to identify ways in which the sensitive area resource regulations could be improved.

Department Response: We do not concur with this statement. The draft EIR evaluates all land use impacts as significant and mitigated. Potential land use impacts for residential uses will be mitigated through the requirement of approval of Site Plans at the discretionary level. Policy level impacts are mitigated through the Site Plan requirement for any projects proposed in steep hillside areas and/or sensitive biological resource areas. In addition, property owners will have to submit Resource Conservation Plans, the functional equivalent of subarea plans required through the NCCP process, prior to development in any sensitive lands.

With regard to the Otay Valley Regional Park, the park is conceptual in nature and any inconsistencies between it and the present project will need to be addressed by the Park planners when they reach the implementation stage.

A General Plan consistency analysis was performed by Ogden Environmental, and indicated that any potential inconsistencies between the project and the Otay Subregional Plan will be mitigated at the discretionary review level, through the requirements of the Site Plan review process.

Finally, in regard to a process to strengthen the sensitive resource area regulations, these regulations were adopted by the San Diego County Board of Supervisors and are applicable Countywide. Revision of these regulations would have to be initiated by the Board of Supervisors, including a series of public hearings. The sensitive resource area regulations have been applied successfully Countywide, and it is the intent of this project to apply them where necessary in the East Otay Mesa Specific Planning Area to protect sensitive environmental resources that have been identified within the boundaries of this project.

19. The City of Chula Vista would like a discussion of future projects that may be proposed either within or adjacent to the East Otay Mesa Specific Plan, including a County landfill project, a City of San Diego monofil, and a composting project.

Department Response: These projects are all discussed in the draft EIR, on Pages 4.1-10 through 4.1-18, and potential land use incompatibility impacts are addressed on Pages 4.1-29 and 4.1-30. The draft EIR addresses the potential impacts that these projects could cause. However, as none of these projects have yet been proposed, it is the responsibility of the proponents of these projects to address potential land use incompatibility impacts at the time they are initiated.

20. The City of Chula Vista cites potential mitigation measures between the East Otay Specific Plan Area and the proposed Otay Valley Regional Park.

Department Response: See Response M.18. above.

21. Potential biological impacts and coordination with the regional habitat mapping programs being performed by several jurisdictions should have been explained in more detail, according to the City of Chula Vista.

Department Response: Future project proponents will need to submit Site Plans, prepare Resource Conservation Plans, and must coordinate with the relevant State and Federal resource agencies in any areas that contain sensitive habitat and/or species prior to allowing development in any biologically sensitive areas.

22. The City of Chula Vista would like a cumulative noise analysis on the westerly areas of Otay Mesa near I-805, the southeasterly portion of Chula Vista, and upon sensitive biological resources within and adjacent to the project area.

Department Response: "Noise generated by project related traffic is expected to cumulatively increase the noise levels at the existing sensitive receptors located along the off-site access roadways (draft EIR, Page 4.8-21)." Increased noise will affect one house on Otay Mesa Road and numerous homes along Otay Valley Road near I-805. A similar statement is found on Page 4.8-26 as it relates to noise impacts upon sensitive habitat.

Mitigation for noise impacts to off-site residences include the requirement for site specific noise studies when roadways adjacent to off-site residences are realigned or upgraded (Page 4.8-32). In addition, the draft EIR recognizes that impacts to sensitive habitat may not be able to be fully mitigated, but does require site specific noise analysis at the discretionary review level.

23. The City of Chula Vista states that a wastewater peaking factor is incorrect.

Department Response: The wastewater peaking factor will be corrected.

24. The City would like one term to be used for all trunk sewer segments identified in the text.

Department Response: Comment so noted.

25. The City would like to know how much flow has been included in the 1999 sewer capacity assessment.

Department Response: This is not an environmental issue and will be responded to separately.

26. The City questions an assumption in the report about whether sewer use in the trunk sewer will be permanent or temporary.

Department Response: This is not an environmental issue and will be responded to separately.

27. Construction of the Otay Valley Water Reclamation Plant by 1998 may be done by agencies other than that listed in the draft EIR, according to the City of Chula Vista

Department Response: Comment so noted.

28. A comment was made about coordination with the City of Chula Vista regarding alternatives for wastewater transmission.

Department Response: Wastewater transmission, treatment, and reclaimed water systems will be coordinated with the surrounding water and sewering agencies.

- N. On January 14, 1994, the Department of Biology, San Diego State University (SDSU), responding for the San Diego Audubon Society, commented with the following concerns:
 - 1. SDSU/Audubon noted a number of discrepancies between the biological technical report and the draft EIR.

Department Response: The 1991 fieldwork was predicated on the fact that much of the East Otay Mesa site had been previously surveyed in detail. Documentation used included Bauder's 1986 report, the biological constraints study for the Rancon project (ERCE 1990), the biological survey

and constraints report for the Otay Mesa off highway vehicle park (Westec 1985), and the biological survey for the East Mesa Detention Facility (Westec 1988). All of these are referenced in the biological technical report.

In addition, focused vernal pool studies were conducted by Ogden in 1993 for two unrelated projects in the area, both of which are referenced in the biological technical report.

In some cases, existing information was updated or modified based on the 1991 survey results. In other cases, where no sensitive resources were noted in 1991, the existing database was retained. If discrepancies exist between the 1991 data and previous studies, it is due to a lack of accurately mapped information in the earlier reports. These discrepancies, however, do not change the overall findings in the draft EIR, which identify vernal pools, potential vernal pool habitat, Coastal sage scrub, and other sensitive habitat and/or species as sensitive, worthy of protection, and subject to regulatory action.

Vernal pools in the J-22 complex were numbered for purposes of correspondence between County staff and Ogden Environmental. References to these numbers were included in the text in error. Pool 6 is the long and narrow artificially created pool in the southwest portion of this complex, south of the future Lone Star Road.

2. SDSU/Audubon indicated that most of the discussion is focused on animals, not rare plant species, and that agricultural lands present habitat opportunities. They also noted that several rare plant and animal species may occur in the project area.

Department Response: Areas mapped as agriculture are areas that were in active cultivation during the survey periods. The nature of agricultural activities precludes the persistence of most sensitive plant species. No vernal pool indicator species were observed during the surveys, nor were there any records of any such occurrences.

It is acknowledged that active and fallow agricultural fields can and do have wildlife value, and this is discussed in several places in the documents (Biological Technical Report, pp. 32, 78, 80-82, and 84; draft EIR, Section 4.3.3.2). Agricultural lands are generally not considered restorable for sensitive species or convertible to native habitats from a practical, cost effective perspective. However, as mentioned above, these lands can be useful for certain wildlife species, and preservation of a portion of the

agricultural areas was recommended as a potential mitigation measure for raptor species.

Regarding potential on-site habitat for sensitive species, including Acanthomintha Ilicifolia, Pogogyne nudiuscula, Hemizonia conjugens, Myosurus minimus, and Brodiaea orcuttii, please note that this area has been surveyed repeatedly, over several years and climactic conditions. Although it is always possible that a new locality may be found for one of these species in the future, this possibility is considered low based on multiple year surveys with negative results, and extensive surveys conducted during a year of exceptional rainfall (1993).

3. SDSU/Audubon does not think the biological surveys were conducted at the correct time of the year.

Department Response: Vernal pool surveys in 1991 were conducted in May and June only after it was determined through visits to known vernal pools that vernal pool species were present and detectable during this time period. The focus of the surveys was the detection of sensitive vernal pool species, and is considered adequate for the majority of these species. Although Myosurus minimus often blooms earlier in the season (April), the presence of several other early blooming species provided a good indication that conditions were still appropriate for this species, if present. Unless unseasonably hot weather occurred during this time period, Myosurus would persist in a fruiting stage for some time, thereby being identifiable to botanists familiar with the morphological characteristics of this taxon. In addition, information from the 1991 surveys was supplemented by both earlier and later surveys, which ran the gamut of survey periods.

Mapping of the J-22 vernal pool area was done for the Rancon project site, and was conducted at a 1"=200' scale, with 1 foot contours. This information was transferred to the East Otay Mesa database for purposes of presentation and consistency with the rest of the document. The detailed mapping was used for analysis and planning purposes.

- O. On January 17, 1994, Melvyn Ingalls responded with the following comments:
 - 1. Mr. Ingalls does not agree that vernal pools are found on Parcel 646-040-07 and 08, but rather are low spots resulting from cultivation of the property.

Department Response: Mr. Ingalls' property is within the boundaries of the larger CSA, directly north of the Specific Plan Area. Ogden biologists surveyed both the CSA and the Specific Plan Area, with emphasis upon the

Specific Plan Area. They identified a vernal pool north of Mr. Ingalls' property, with potential vernal pool habitat (no pools identified, but habitat of similar type and quality to hold potential for vernal pools) noted on his property. Future biological surveys that may be conducted will determine the extent, if any, of vernal pools on the Ingalls property.

- P. On January 17, 1994, Mesa 45 responded with a letter written in Spanish. The translation of their letter into English is attached to the original. They had the following concerns:
 - 1. Mesa 45 was concerned with the locations of streets and roadways, sewer systems and pumping stations, a potential sewage treatment plant, the storm drains, the regional detention (storm water) facility, the future road location, and the locations of the vernal pools. They feel that the locations of these facilities will adversely impact their land.

Department Response: The East Otay Mesa Specific Plan was prepared by consultants for the County, in conjunction with numerous property owners meetings. Development of the plan we are reviewing was a multi-phase process, with extensive property owner and public agency participation over a three year period.

The first phase involved extensive data collection on environmental, public facility, transportation, and economic factors. During the second phase, alternative land use, circulation, and infrastructure concepts were studied and evaluated. A consensus preferred plan and phasing strategy were agreed upon by County staff and property owners in December 1992.

Because this was a plan built upon consensus, impacts of the facilities needed for ultimate development of the property will be felt by all property owners. Although the owners of the Mesa 45 properties feel that the infrastructure improvements will adversely effect their land, the overall impacts of the Specific Plan have been disbursed as much as possible over the entire 3,300+ acre project area.

In addition, the Mesa 45 property is physically lower in comparison with other properties, and water from other properties drains toward Mesa 45.

Q. On January 17, 1994, the California Native Plant Society (CNPS) responded with the following concerns:

 The CNPS believes that the draft EIR is inadequate because it does not address the relationship of the Specific Plan Area to the NCCP or MSCP habitat conservation programs.

Department Response: See Response E.1. above.

2. Impacts to sensitive habitats, specifically Coastal sage scrub, are not acceptable.

Department Response: The EIR addresses impacts to all resources on a worst case basis; that is, it assumes that all sensitive habitat and species will be eliminated. Provisions have been built into the Specific Plan Area, however, that will significantly lessen potential adverse impacts at the discretionary level. For example, the Specific Plan Area has identified sensitive habitat lands and sensitive species with a "G" Special Area Regulator per the requirements of The Zoning Ordinance, which mandate a more detailed examination of potential biological impacts at the time of subdivision and/or permit review.

In addition, applicants are required to submit Resource Conservation Plans at the permitting stage, and will also need to coordinate with the relevant resource agencies to obtain separate permits from these agencies prior to development.

3. The CNPS notes that there should be maximum preservation of Stipa grassland, and impacts should be avoided.

Department Response: Impacts to Stipa grassland will be minimized as much as possible. In both the biological technical report and the draft EIR, it is stated that "Unavoidable impacts to Stipa grassland in excess of 10 percent are significant and unmitigable. If preservation is not possible, then 'in-kind' habitat creation/restoration and/or enhancement shall be required. Restoration will be conducted in disturbed areas (native or non-native grassland, or bare ground) known or suspected to have supported native grassland."

4. The CNPS indicated that a small amount of Southern interior cypress forest will be impacted, and that individual trees may be mitigated by replacement, but that discrete stands in O'Neal Canyon need to be preserved.

Department Response: As noted in the draft EIR, up to 15 individual cypress trees could be impacted. The draft EIR indicates that replacement of the individual trees is a significant but mitigable impact. It is

- recommended that they be replaced at a 10:1 ratio. No discrete stands of cypress trees will be impacted.
- 5. Regarding sensitive plant species, the CNPS prefers that avoidance and minimization of impacts be the primary option, similar to that discussed in the documents.
 - Department Response: Comment so noted, as this is recommended in the draft EIR and the biological technical report.
- 6. The CNPS notes that up to 4.6 acres of wetlands could be disturbed by the project, and that the Federal and State resource agencies have a not net loss of wetland habitat policy.
 - Department Response: The Department is aware of these policies, and the individual properties on which wetland habitats exist will need to deal with these issues at the time of permit application.
- 7. The CNPS notes that preservation of the J-22 vernal pool complex is warranted, and that further survey work is needed for the potential vernal pool area near the border.
 - Department Response: Comment so noted, and this is stated in the documents.
- 8. Several sensitive plant species were listed by the CNPS, and a recommendation was made about preserving O'Neal Canyon as a wildlife corridor.
 - Department Response: The majority of O'Neal Canyon is outside the Specific Plan Area boundary, but within the CSA boundary. It is recognized in the documents that it functions as an important wildlife corridor, and supports several sensitive plant and animal species.
- 9. The CNPS made several comments regarding the Otay tarplant, and noted the requirement for consultation under the State Endangered Species Act.
 - Department Response: See Response Q.7. above.
- 10. The CNPS does not agree with the finding of non-significance for the San Diego County needlegrass.

Department Response: The draft EIR indicates that impacts to more than ten percent of the San Diego County needlegrass would be significant and not mitigable.

11. Table 4.3-8 in the draft EIR does not list cumulative impacts for Spiny rush, San Diego County viguiera, and San Diego barrel cactus, nor is there mitigation listed for Otay manzanita. Potential indirect impacts should also be listed in this Table.

Department Response: Cumulative and indirect biological impacts are addressed on Pages 101-103, 148-150, 150-165, and 177-181 of the biological technical report. Otay manzanita is found on the Otay Mountain Truck Trail, outside Specific Plan Area boundaries.

12. The CNPS believes that the draft EIR is inadequate, and that the Specific Plan Area is incompatible with the MSCP and the NCCP.

Department Response: The Department believes that the draft EIR is adequate per the requirements of the CEQA, and identifies impacts to biological resources and noise as significant and not mitigable with the project as proposed. A Statement of Overriding Considerations is included in the final EIR to allow for the project to proceed as proposed. The relationship of the project to the MSCP and the NCCP is discussed in Response E.1. above.

- R. On January 25, 1994, a letter was received from the U.S. Fish and Wildlife Service, after the close of the public review period, with the following comments:
 - 1. The U.S. Fish and Wildlife Service would like the County to prepare and submit a subarea plan for the southern portion of the County pursuant to the upcoming requirements of the NCCP.

Department Response: As the U.S. Fish and Wildlife Service is aware, the County of San Diego has been working with the affected jurisdictions in the area, including the City of Chula Vista, the City of San Diego, and the U.S. Fish and Wildlife Service to prepare a subarea plan for the southern portions of San Diego County. This is an on-going and cooperative process on the part of all these jurisdictions, and has not yet been completed.

The East Otay Mesa project precedes the conclusion of the subarea plan process, but takes into account the importance of habitat planning and the preservation of open space through a number of mechanisms. This includes the requirement of a "G" Sensitive Area Regulation to deal with

natural areas prior to development in these locations; the submittal of a Site Plan to address these issues; the preparation of Resource Conservation Plans prior to development; and, the ultimate dedication of open space to be preserved in perpetuity upon subsequent project approval.

2. The U.S. Fish and Wildlife Service notes that 280 acres of Coastal sage scrub has been designated low quality, but supports 4 pairs of California gnatcatchers. They indicate that development within the 280 acres would likely constitute a "take" of the gnatcatcher, and that no explicit mitigation has been offered to alleviate the potential impacts.

Department Response: It was stated in the draft EIR that four pairs of gnatcatchers could be impacted as a result of the proposed project. The mitigation presented, since there is at present no project upon which to assess possible impacts, is the use of the "G" Sensitive Area Regulation, the Site Plan requirement, the preparation of Resource Conservation Plans, and ultimate dedication of open space easements at the discretionary review stage. The issue of the potential "take" of gnatcatcher will be decided by the State and Federal resource agencies at the time of permit application.

 The Service would like clarification regarding the 43 pair of gnatcatcher within the CSA beyond the disturbed Coastal sage scrub, and what proportion of the pairs occur in the "G" areas.

Department Response: Based on a worst case analysis, the proposed Specific Plan Area could directly impact 18 documented gnatcatcher pairs and indirectly impact 4 additional pairs. Of these 18 pairs, the industrial district could impact 9 gnatcatcher pairs directly and 2 pairs indirectly. The hillside residential district could impact an additional nine pairs directly, and two pairs indirectly. Therefore, there are 25 pairs of gnatcatcher that would not be impacted.

4. The Service is concerned about the future of the J-22 vernal pool complex, in that it could contribute to the degradation of the complex. They are also concerned about the potential vernal pool complex near the border.

Department Response: The majority of the J-22 vernal pool complex would be preserved under the plan, with potential impacts to two of the seven identified. Any impacts to these pools must be addressed at the discretionary permit stage, through local, State, and Federal regulatory review. The potential vernal pool complex near the border will be addressed through the requirement of detailed biological surveys during the permit

- application stage, and, again, will require permit coordination with the relevant regulatory agencies.
- 5. The Service is concerned about potential indirect biological impacts from potential projects that could occur within the Specific Plan Area boundary, including SR 125, alternative landfill sites, a sludge processing plant, a raceway, and an off highway vehicle park.
 - Department Response: Potential biological impacts from these projects will be addressed at the implementing permit stage. For now, the locations of sensitive biological resources have been identified through the Specific Plan process, and impacts to these species will be mitigated when projects are proposed in these areas.
- 6. The Service is not convinced that the mechanisms to be used to protect and preserve significant biological resources will be effective.
 - Department Response: The "G" Designator is a tool of The Zoning Ordinance that mandates closer examination of sensitive biological resources when discretionary permits are requested. No permits can be issued until all biological issues have been resolved. Since no permits have presented been applied for, the County cannot mandate the dedication of open space easements at the General Plan or Specific Plan level. Potential impacts to significant biological resources will be mitigated when projects are proposed in the biologically sensitive areas.

DEPARTMENT OF THE TREASURY

U.S. CUSTOMS SERVICE

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DEC - 3 1933

Mr. Gary Fink
Environmental Management Specialist III
County of San Diego
Department of Planning and Land Use
5201 Ruffin Road, Suite B
San Diego, California 92123

Dear Mr. Fink:

We have received the County San Diego Draft Environmental Impact Report, Draft Specific Plan for East Otay Mesa, Related General Plan Amendment (GPA 94-02), and Zone Reclassification (R93-008), Log No. 93-19-6.

We can not respond to the Draft with regard to the proposed new Port of Entry without prior approval from the Governments of the United States and Mexico. Any such proposal must be submitted through the Department of State for the appropriate permits. Once permits and diplomatic notes were obtained, a request for a designated crossing would then have to be published in the Federal Register for comments by Customs Headquarters.

A further review by my staff indicates that this proposal, in addition to the previous proposals which have already been approved, e. g., the Dennery Ranch, Hidden Trails, the Otay Rio Business Park, Otay Corporate Center North, South Palm Mobile Home Park, Palm Vista Estates, and the Gateway Fair Commercial Center, will significantly impact the volume of traffic on the "Mesa."

In addition, expanded cargo activities at the Otay Mesa Port of Entry, which will be completed and operational by June 1994, the approved developments listed above, and the proposed development in your Draft will significantly increase the volume of traffic utilizing Highway 117, SR-905 and SR-125, when complete.

We are concerned about this volume of traffic. Therefore, we strongly recommend that all freeway-to-freeway interchanges be built-out prior to completion of these developments.

We appreciate the opportunity to review and comment on City plans. If you have any questions, please call either me or Gurdit Dhillon at 619 557-5360 extension 111 or 121

RUDY M. CAMACHO District Director December 15, 1993

Mr. Mark Carroll, A.I.C.P. Associate Planner Department of Planning & Land Use County Of San Diego 8525 Gibbs Dr., Suite 100 San Diego, CA 92123

Dear Mr. Carroll:

Re: East Otay Mesa Specific Plan

It became evident while reading the Specific Plan that the development of the East Mesa is solely contingent upon the construction of State Route 125. The supporting circulation routes to this Freeway have been laid out, and I have a concern regarding the path taken by Paseo De Las Americas. This road is currently established in the City of San Diego portion of the Otay Mesa development; however, it is proposed, when entering the East Mesa Specific Plan area, to do a forty-five degree transition to the east and then resume its northerly pattern.

There are only five homes in the East Mesa currently inhabited, and this road appears to take two homes out. Other than providing the land owner in this section access on both sides of this road, there is no apparent reason for its move off the section line (straight northerly track). The balance of the roads in this plan follow or nearly follow original section lines as laid out in years past.

We do not understand the rationale for the alignment of Paseo De Las Americas and would appreciate your reasoning for such alignment and the need to proceed directly through the path of some of the homes on the Mesa.

Sincerely,

Andrew B. Campbell

Matherene U. Canephell Kathryn Campbell

Wallace E. Wetmore

Wethen



John M. Shaw DEVELOPMENT

December 27, 1993

Mr. Mark Carroll, A.I.C.P.
Associate Planner
Department of Planning and Land Use
County of San Diego
5201 Ruffin Road, Suite B
San Diego, California 92123

Re: East Otay Mesa Specific Plan

Dear Mark:

Upon review of the Draft Environmental Impact Report for the East Otay Mesa Specific Plan, I must raise the following apparent discrepancy between the EIR and previously established mitigation measures on our property.

Specific reference is made to pages ES-2 and Table 4.3-5 of the EIR in which the J22 complex mitigation calls for 100% retention of the complex. This is not the mitigation our organization had negotiated with the County and if ultimately required will create a significant hardship on our efforts to develop our property in accordance with the envisioned area General Plan and, as pointed out in other portions of the text (i.e. pages 4.3-52 and 81), will be virtually impossible to preserve intact with the surrounding infrastructure development. The mitigation agreement as documented in the County letter dated September 29, 1993 will allow us to move forward in a logical, environmentally sound and financially responsible manner.

I would greatly appreciate your assistance in favorably resolving this issue.

Sincerely,

ohn M. Shaw

Senior Vice President

Development

ce: Robert H.S. Kirkpatrick
Joe Ellis - Solidus

27720 Jefferson Avenue Temecula, California 92390 (7)4) 676-6664

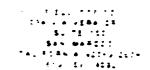


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County of San Diego

DEPARTMENT OF PLANNING AND LAND USE

STON BUFFIR ROAD SUITE B. SAN DIEGO, CALIFORNIA ST125-1664



September 29, 1993

John Shaw Rancon Realty Funds 27720 Jefferson Avenue Temecula. California 92590

RANCON 253 ACRE PARCEL, NORTHEAST CORNER OF OTAY MESA AND HARVEST ROADS, ENVIRONMENTAL MITIGATION MEASURES

Dear Mr. Shaw:

This letter is in response to your request regarding environmental issues relating to your parcel on Otay Mesa, and its relationship to the Otay Mesa Specific Plan and Environmental Impact Report. As you are aware, cultural and biological studies have been performed on your property, both by Rancon under the County's direction and by County consultants as a part of the Specific Plan Work Program. Based upon these studies and the planning effort of the Specific Plan consultants, the course of action outlined below is tentatively acceptable to County staff. However, be advised that development of your property will be subject to approval by all concerned Federal and State wildlife agencies and certification of the final Environmental Impact Report by the Board of Supervisors.

The area (approximately 50± acres) lying northeast of the proposed Lone Star Road Prime Arterial on the proposed Otay Mesa Specific Plan will remain undeveloped due to the presence of vernal pools, cultural sites, wetlands, and steep slopes. The area southwest of Lone Star Road may be allowed to develop in accordance with the approved Specific Plan, subject to the following restrictions proposed by Rancon and any other mitigation measures required by the Federal and State wildlife agencies:

1. All cacti south of Lone Star be transplanted to the north. This is workable provided there is the correct slope, soil type, exposure, and moisture.

- 2. That an attempt be made to create a new vernal pool northeast of Lone Star Road. The wildlife agencies may also require successful creation of a comparable off-site vernal pool and/or additional off-site mitigation.
- 3. That a "hole" be created east of Lone Star to replace the borrow site on the west.
- 4. That Coastal sage scrub be seeded in the area north and east of Lone Star Road.
- 5. That existing vernal pools located northeast of Lone Star be enhanced, improved, and maintained in accordance with an approved resource management plan by Federal and State wildlife agencies.

Please note that the implementation of these proposed restrictions will be developed in greater detail at a later stage, based on further biological studies, and will eventually be made conditions of project approval.

The environmentally sensitive property designated industrial, located south of Lone Star Road, will be subject to a "6" Sensitive Area Designator. This will trigger environmental review and incorporation of these mitigation measures prior to development or the issuance of grading permits.

Based upon the land uses proposed in the East Otay Mesa Specific Plan, the restrictions outlined above will provide for a logical, unified area for development southwest of Lone Star Road, and preserve the significant environmental resources to the north and east. Formal input from the wildlife agencies, such as the U.S. Fish and Wildlife Service and the California Department of Fish and Game, will occur during the 45 day public review period on the Environmental Impact Report. At the conclusion of the public review period, we will have an official response from these agencies regarding the adequacy of the proposed mitigation measures and will share that information with you. Your property will not have precise project-specific mitigation requirements until such time as a development application or grading permit is submitted. Approval for any disturbance of habitat is required by the wildlife agencies prior to any work taking place.

Recently, the U.S. Fish and Wildlife Service listed four endangered plant and animal species as endangered that occupy vernal pool habitat. Eryngium is located in one of the pools located south of Lone Star Road. It is possible that this Federal action may completely prohibit the destruction of that pool. When the Service has reviewed the East Otay Mesa Specific Plan and Environmental Impact Report, we will have more specificity regarding the proposed mitigation measures.

I hope this information provides you with some direction as to the use of your property. Should you have additional questions or concerns, please contact Mark-Carroll at 694-2976 or Gary Fink at 694-3016.

Sincerely,

ROBERT E. ASHER, Chief Special Projects Section

CC: Shawna Anderson, Ogden Environmental
Bryan Grunwald, Planning Consultant
Marina Brand, Department of Planning and Land Use
Mark Carroll, Department of Planning and Land Use
John Desch, Department of Planning and Land Use
Mike Evans, Department of Planning and Land Use
Tom Oberbauer, Department of Planning and Land Use

AUTHOR\FSLTRMC1.993



INTERNATIONAL BOUNDARY AND WATER COMMISSION UNITED STATES AND MEXICO

DEC 39 1993

Mr. Gary R. Fink
Department of Planning and Land Use
County of San Diego
5201 Ruffin Road, Suite B.
San Diego, California 92123-1666

Dear Mr. Fink:

Thank you for the opportunity to review and comment on the Draft Environmental Impact Report (EIR) for the East Otay Mesa Specific Plan, dated October, 1993 (GPA 94-02; Log No. 93-19-6). Also subject to review and comment with the EIR are the Draft East Otay Mesa: Site Planning and Design Guidelines, dated October, 1993, and the Draft East Otay Mesa Specific Plan (Specific Plan), dated November, 1993.

The EIR addresses the potential environmental impacts resulting from the development of the proposed land uses in the Specific Plan. It is understood that the East Otay Mesa Specific Plan Area (SPA) encompasses an area of nearly 8,110 hectares (3,282 acres) in southwestern San Diego County extending generally southerly from the Otay River Valley to the United States border with Mexico. The SPA shares its southern boundary with the United States and Mexico international boundary, and the Specific Plan proposes industrial, commercial, and hillside development on the land within the SPA.

On November 5, 1992, you were provided information on the authority, scoping comments, and concerns of the United States Section of the International Boundary and Water Commission, United States and Mexico (USIBWC), for the proposed EIR. Your consideration of our comments is appreciated in the preparation of the subject documents.

General Comments on the Draft EIR:

One concern, as stated in EIR Section 4.1, page 4.1-27, is that the East Otay Mesa SPA does not reference or make provisions for Boundary Monument No. 252, and that potentially significant impacts could occur to that structure. It is strongly recommended that the Specific Plan be amended to provide the necessary precautionary measures to ensure that it will not be disturbed. It is understood that Policy C-4 of the Specific Plan (Specific Plan, page 44) does provide for a right of way along the United States and Mexico border slightly more than 9 meters (30 feet) wide which will accommodate an access road and utility

easement. This easement will possibly provide a sufficient buffer to protect the international boundary, monuments and border markers; however, it is preferred that the Specific Plan be amended to provide the necessary precautionary measures to ensure that the border zone will not be disturbed. Such precautionary measures should include language that activities within the buffer zone identified in Specific Plan Policy C-4 shall not impede the visibility and permanent placement of the international boundary monuments and/or markers, fences shall be offset from the international boundary line by a distance of not less than 1.5 meters (5 feet), and no waste or roadway construction materials shall be permitted to be piled in the areas near the international boundary.

The EIR indicates that an approximately 0.3 meter (1.0 foot) distance is to be maintained from Boundary Monument No. 252 to mitigate potential impacts. Not withstanding the buffer zone provided by Policy C-4, it is preferred that this distance be increased to at least 1.5 meters (about 5 feet). This should provide adequate separation for any future maintenance or other work that the USIBWC might need to conduct at this site.

The 18 meters (60 feet) wide strip of public lands, reserved by Presidential Proclamation in 1907 (copy attached), is located in Section 33 in the easternmost portion of the SPA. The reserved land is located adjacent to the international boundary within T18S, RIE, Sec. 33. This location should neither affect nor be affected by the Specific Plan; however, you should be aware of its location and provide for its preservation in any activities planned for the SPA.

In EIR Section 4.6, hydrology and water quality are discussed, and you describe the SPA as being contained within three watersheds: Otay River, Mexico, and City of San Diego. On EIR page 4.6-8, the impacts within the Mexico Watershed are described as not significant with the implementation of the regional detention basins to control the southward flows from the SPA. The USIBWC is concerned that these structures will be similar to that used at Otay International Center, located east of and adjacent to the Otay Mesa port of entry. Soon after this structure went into operation, erosion occurred in Mexico and the Mexican Government filed a formal complaint. A satisfactory resolution to this problem is yet to occur. The USIBWC cannot endorse the use of such structures in the future for the control of runoff from the United States watershed toward Mexico. requested that the USIBWC be included as a coordinating agency for the planning and development of regional and on-site storm water drainage detention facilities within the Mexico Watershed to ensure impacts associated with the construction, operation and

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maintenance of these structures do not occur either in Mexico or to the international boundary.

EIR Section 4.11.7 indicates that no wastewater collection system exists in the SPA, and two alternatives are considered to address the wastewater needs for the SPA: Metro Connection and Onsite Treatment Plant. The proposed onsite treatment plant is described as a conventional secondary activated treatment plant with tertiary reclamation facilities consisting of filtration and disinfection to provide unrestricted irrigation. A provision for about 84 days of effluent storage is required by the California Regional Water Quality Control Board for "wet weather years" when reclaimed water is not in demand. Based on Figure 4.11-6 (EIR page 4.11-30), two options are considered for these reservoirs located north and northeast from the proposed 25 hectares (10 acres) wastewater treatment plant site located adjacent to the United States and Mexico international boundary due east from Otay International Center. It is requested that the USIBWC be included in the coordination and development of plans for this proposed wastewater treatment plant to ensure impacts associated with the construction, operation and maintenance of this plant do not occur either in Mexico or to the international boundary.

The USIBWC in its review of the alternatives to the proposed Specific Plan has a preference for the environmentally preferred alternative discussed on EIR pages 5-28 through 5-41. This alternative appears to have fewer impacts within the Mexico Watershed. Although the impacts discussed on EIR page 4.6-8 for the Mexico Watershed are mitigable by implementation of the regional detention basins, the USIBWC does have reservations (stated above) about their adequate control of surface runoff unless included, as requested, in their planning and development.

Specific Comments on the Draft EIR:

The American International Raceway (on EIR page 4.1-10) is also referred to as the San Diego International Raceway (on EIR page 4.1-15, Figure 4.1-7). The use of these two names occurs frequently in several other locations within the EIR, and it is suggested that a single name be used to reduce confusion.

Reference is made on EIR page 4.2-13 to "Section 5.1.1 of the Specific Plan" regarding grading guidelines; there evidently is no such section in the Specific Plan. Apparently this reference should be changed to Section 1.1 of the East Otay Mesa: Site Planning and Design Guidelines in which grading requirements are discussed.

On EIR page 4.6-8, 2nd paragraph, 1st sentence, change "U.S. section" to "U.S. Section."

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General Comments on the Draft Site Planning and Design Guidelines:

In Guidelines Section 1.1, page 6, language should be included to ensure that if grading is proximal to the United States and Mexico international boundary it shall not impede the visibility and permanent placement of the international boundary monuments nor shall the grading cause an increase of total volume, peak runoff, or flow concentration across the border. Also, no waste or roadway construction materials shall be permitted to be piled in the areas near the international boundary.

8,

In Guidelines Chapter 4, pages 29 through 31, it is requested that the USIBWC be a reviewing agency for all site plan applications adjacent to the international boundary or located on international drainages. The USIBWC should, at the least, receive for review a copy of those items identified by numbers 2, 3, 7, 8, 9, 10, and 11 in the Site Plan Review process.

General Comments on the Specific Plan:

In Specific Plan Chapter 2.5.2, page 71, include the USIBWC as a coordinating agency for the development of an on-site wastewater treatment facility (Policy PF-4) to ensure impacts associated with the construction, operation and maintenance of this plant do not occur either in Mexico or to the international boundary.

In Specific Plan Chapter 2.5.4, page 72, include the USIBWC as a coordinating agency for the planning and development of regional and on-site storm water drainage detention facilities (Policy PF-6) to ensure impacts associated with the construction, operation and maintenance of these structures do not occur either in Mexico or to the international boundary.

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Coordination for proposed wastewater treatment facilities and water quality issues should be conducted through Mr. Osborne Linguist, Division Engineer, Environmental Management Division, at this address or call 915/534-6704, and for storm water drainage issues should be conducted through Mr. James Robinson, Jr., Division Engineer, Water Resources Investigations Division, at this address or call 915/534-6707.

Thank you again for the opportunity to provide our comments on the Draft East Otay Mesa EIR, Site Planning and Design Guidelines, and Specific Plan. We look forward to working with you to insure that international impacts are not caused by any proposed development in the SPA. Please provide me with two (2) copies each of the subject final documents when they are completed. Also provide one (1) copy each of the subject final documents to Mr. C.W. Ruth, San Ysidro Projects Engineer, P.O. Box 434232, San Ysidro, California 92143.

Sincerely,

Conrad G. Keyes, Jr.

Principal Engineer, Planning

Attachment:

Presidential Proclamation of 1907

By the President of the United States of America, A Proclamation.

Town therefore, I. The propose Roosevelt, President 2-the Casters

Now, therefore, I. Tradopore Roosevely, President Mathe Carter States, do hereby declare, proclaim and make known that there are hereby reserved from entry, settlement or other form of appropriation under the public land laws and set apart as a public reservation, all public lands within sixty feet of the international boundary between the United States and the Republic of Mexico, within the State of California and the Territories of Arizona and New Mexico; and where any river or stream forms any part of said international boundary line, this reservation shall be construed and taken as extending to and including all public lands belonging to the United States which lie within sixty feet of the margin of such river or stream.

Excepting from the force and effect of this proclamation all lands which are at this date embraced in any legal entry or covered by any lawful filing, selection or rights of way duly of record in the proper United States Land Office, or upon which any valid settlement has been made pursuant to law, and the statutory period within which to make entry or filing of record has not expired; and also excepting all lands which at this date are embraced within any withdrawal or reservation for any use or purpose to which this reservation for customs purposes is repugnant; Provided, that these exceptions shall not continue to apply to any particular tract of land unless the entryman, settler or claiment continues to comply with the law under which the entry. Sing or settlement the law under

Provided further, that the said strips, tracis or parcels of said few years places and may be used for public highways but for no other purpose whatever, so long as the reservation of same under this proclamation shall continue in force.

In Witness Whereof, I have hereunto set my hand and caused the seal of the United States to be affixed.

Done at the City of Washington this 27th day of May, in the year of our Lord one thousand nine hundred and seven, and of the Independence of the United States the one hundred and thirty-first.

THEODORE ROOSEVELT

y the President:

ELINU ROOT

Secretary of State.

GOVERNOR'S OFFICE OF PLANNING AND RESEARCH 1400 TENTH STREET SACRAMENTO, CA 95814



January 7, 1994

GARY R. FINK COUNTY OF SAN DIEGO, DPLU 5201 RUFFIN ROAD, SUTIE B SAN DIEGO, CA 92123

Subject: EAST OTAY MESA SPECIFIC PLAN SCH #: 92101099

Dear GARY R. FINK:

The State Clearinghouse has submitted the above named draft Environmental Impact Report (EIR) to selected state agencies for review. The review period is now closed and the comments from the responding agency(ies) is(are) enclosed. On the enclosed Motice of Completion form you will note that the Clearinghouse has checked the agencies that have commented. Please review the Motice of Completion to ensure that your comment package is complete. If the comment package is not in order, please notify the State Clearinghouse immediately. Remember to refer to the project's eight-digit State Clearinghouse number so that we may respond promptly.

Please note that Section 21104 of the California Public Resources Code required that:

"a responsible agency or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency."

Commenting agencies are also required by this section to support their comments with specific documentation.

These comments are forwarded for your use in preparing your final EIR. Should you need more information or clarification, we recommend that you contact the commenting agency(ies).

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact Mark Goss at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Michael Chiriatti, 3r.

Chief, State Clearinghouse

Enclosures cc: Resources Agency DEPARTMENT OF FISH AND GAME 300 GOLDEN SHORE, SUITE 50 10NG BEACH, CA 90802 ,310) 590-5113



E.

December 30, 1993

Mr. Gary Fink County of San Diego Department of Planning and Land Use 5201 Ruffin Road, Suite B San Diego, California 92123-1666

1-7.94

Dear Mr. Fink:

Draft Environmental Impact Report (DEIR) for East Otay Mesa Specific Plan SCH 92101099, San Diego County

The Department of Fish and Game (Department) has reviewed the DEIR and related Specific Plan for the East Otay Mesa Area, in the southern part of San Diego County. The proposed project would encompass the development of 3,300 acres within a 20-year time frame into mixed industrial, commercial, roadways and residential land uses. Approximately 830 acres of coastal sage scrub are within the Specific Plan Area (SPA), 75 acres of chaparral, 28 acres of native grassland, 18 acres of vernal pool/mima mound habitat and lesser amounts of other native habitats. Non-native grasslands and agriculture account for approximately 2,151 acres within the SPA. The Department's comments and recommendations follow:

.1. The SPA lies within the City of San Diego's Multiple Species Conservation Plan (MSCP) area and contains coastal sage scrub habitat, which is the focus of the State's Natural Communities Conservation Planning (NCCP) program. The DEIR fails to adequately address project impacts and mitigation relative to these regional conservation planning efforts. The plans are referred to in the document, but the results of the plans should be incorporated into the design of the Approximately 552 acres of coastal sage scrub will be SPA. impacted in the SPA, if the project as proposed is implemented. The biological technical report states on page 104 that "impacts to coastal sage scrub within the proposed SPA appear to be inconsistent with the regional habitat conservation plans currently being developed". Department concurs with the statements made in this report that impacts to coastal sage scrub and the California gnatcatcher within this SPA are significant and potentially unmitigable. Direct, indirect and cumulative impacts are inadequately mitigated.

6

Mr. Gary Fink December 30, 1993 Page Two

2. The plan proposes to conserve high resource value areas (east hillsides, Johnson Canyon and the area west of Johnson Canyon) by placing a Rural Residential (a low density use) designation on them. Placing the low density use designation over these areas does not ensure that the remaining habitats will have long-term conservation value. Low density merely fragments the residual habitats and increases the negative "edge effects" associated with development.

The text is unclear in its treatment of mitigation. On page 5 of the Executive Summary (Conservation and Open Space), it states "the areas where mitigation of sensitive resources is proposed are planned for Mixed Industrial and Commercial land use, see Figure 0-2". Later in this section, the report states "It is the objective of the Specific Plan to encourage the acquisition or exaction of Rural Residential planned land use for open space as a potential means of mitigating environmental impact of development on areas planned for Mixed Industrial and Commercial land use, if consistent with State and Federal laws". These statements of resource mitigation policy appear to be in conflict: first suggests that proposed Mixed Industrial and Commercial lands will be the mitigation sites for sensitive resource (i.e., Rural Residential) land impacts, whereas the second suggest that mitigation for proposed Mixed Industrial and Commercial land development impacts will focus on exactions or acquisitions of proposed Rural Residential lands. These statements need to be revised and clarified.

- 3. The analysis of impacts to vernal pools (0.63 acres within the SPA) does not seem accurate. It does not take into consideration potential impacts from grading or hydrological changes that may occur as a result of nearby development. Total avoidance, and preservation and management in perpetuity, is recommended.
- 4. The regional corridor analysis performed for the proposed project should be expanded and take into account needs for multiple species, not only for large mammals and gnatcatchers.
- 5. The Department is interested in learning more about the Sensitive Resource Area Regulations and resource Conservation Plans that would incorporate the sensitive species and habitats into the County's Zoning Ordinance. How can these processes be meshed with the NCCP/Multiple Species Conservation Plan (MSCP) programs?

Mr. Gary Fink December 27, 1993 Page Three

6. The Conservation and Open Space Policies Section (page 35) does not provide any guidance relative to coordination of this Specific Plan with the ongoing regional conservation efforts (e.g., NCCP and MSCP). An explicit policy statement should be included in the Specific Plan that commits the plan to assure that future conservation/mitigation efforts comply with the NCCP and MSCP. Of critical concern are that large blocks of high value natural habitat remain intact and that functional natural habitat linkages are retained or enhanced, as necessary.

The California Endangered Species Act (CESA) as codified in Fish and Game Code \$2050 et. seq., defines the Department's jurisdictional responsibilities for management of State-listed species. Section 2081 of the Fish and Game Code permits the Department to enter into management agreements for the take of State-listed threatened and endangered species. Such agreements, known as CESA-Memorandums of Understanding (CESA-MOU), are entered into to conserve, protect, enhance and restore State-listed threatened or endangered species and their habitats. Early consultation by the City is encouraged, as significant mitigation measures may be required in order to obtain a CESA-MOUs for future developments.

The Department opposes the elimination of water courses and/or their conversion to subsurface drains and channelization. All wetlands and watercourses, whether intermittent or perennial must be retained and provided with substantial setbacks which preserve the riparian and aquatic habitat values and maintain their values to on-site and off-site wildlife populations. Earthen channels should be interconnected with adjacent large open space areas to increase their effectiveness as wildlife corridors in urban surroundings.

The Department has direct jurisdiction under Fish and Game Code \$1601-03 in regard to any proposed activities that would divert or obstruct the natural flow or change the bed, channel, or bank of any river, stream or lake. Early consultation is encouraged since modification of the proposed project may be required to avoid impacts to fish and wildlife resources. Formal notification (with fee) under Fish and Game Code \$1603 should be made after all other permits and certifications have been obtained.

7.

Mr. Gary Fink December 27, 1993 Page Four

In conclusion, the Department cannot concur with the project as proposed due to the inadequate information in the DEIR Specific Plan with regards to impacts and mitigation.

If you have further questions please contact Ms. Terri Stewart, Associate Wildlife Biologist, at (619) 688-4268.

Sincerely,

Regional Manager

Region 5

cc: Ms. Terri Stewart

Department of Fish and Game-NCCP
San Diego, California

Mr. Terry Foreman Department of Fish and Game Ramona, California

Mr. Randy Botta
Department of Fish and Game
San Diego, California

Mr. Jim Dice Department of Fish and Game San Diego, California

Ms. Terri Dickerson Department of Fish and Game San Diego, California

U.S. Fish and Wildlife Service Carlsbad, California

U.S. Army Corp of Engineers Los Angeles, California

State Clearinghouse Sacramento, California

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#### COUNTY OF SAN DIEGO

4109

#### DEPARTMENT OF PUBLIC WORKS

#### INTRADEPARTMENTAL CORRESPONDENCE

January 4, 1994

TO:

M. Lov/Dirk Smith

Department of Public Works

(0385)

FROM:

Robert Hoglen

Department of Public Works

(0336)

SUBJECT:

Draft EIR East Otay Mesa Specific Plan, Dated October 1993, State

Route 125

We have reviewed the Draft EIR and have the following comments:

#### Traffic/Circulation

- Submit the Draft EIR to CALTRANS and the City of San Diego for review and incorporate traffic mitigation measures that are required by CalTrans and the City of San Diego.
- 2. Add the following to the traffic mitigation measures:
  - a. The Circulation Element of Roads proposed in this Draft EIR will require a General Plan Amendment in the County of San Diego.
  - b. The County will require construction of all public roads (in the unincorporated areas) to the satisfaction of the Director of Public Works.

#### Flood Control

Incorporate the following into the Draft EIR. (Strikeouts indicate deletions and underlines indicate additions for sentences that are requested to be changed.)

- 1. Page 4.6-5 under "Surface Water Quality" specifies that surface waters are beneficial to rare and endangered species. Based on conversations in the past, East Otay Mesa area does not have any endangered species. Please verify.
- 2. Change the sentence on page 4.6-5 under "Flooding" as follows: However, the northern extension of Alta Road will cross O'Neal Canyon, and impacts due to flooding ponding are possible if bridge construction takes place within the canyon: 100-year floodplain.

day William

- Change the last sentence on page 4.6-7 under "Increased Runoff" as follows: The proposed development includes watershed specific provisions onsite and regional detention basins for preventing downstream offsite impacts due to increased runoff.
- 4. Change the following sentences on page 4.6-7 under "Otay River Watershed" as follows: The 100-year storm peak discharge was calculated to be 3.638 3.718 cubic feet per second (cfs) for existing conditions and 3.755 3.861 cfs under proposed development conditions. This equals an increase of 117 143 cfs or 3.2 3.8 % over existing conditions (Rick Engineering, 1991 a Nov. 1993).
- 5. Change the sentence on page 4.6-8 under "Mexico Watershed" as follows:

  Guidance for construction An example of a regional detention facilities basin configuration within the Mexico Watershed is also provided in the Comprehensive Flood Control Master Plan.
- 6. The top of page 4.6-10 under "Surface Water Quality Sedimentation" identifies three potential effects that may occur during construction. These effects suggest that sediment will be transported from onsite development and deposited offsite in Otay River and San Diego Bay. All development must comply with the County Grading Ordinance requirements for control of erosion and sedimentation during construction. Compliance with these requirements will reduce sediment transport and offsite impact to a minimum. Based on the distance to San Diego Bay (approximately 10 miles) and the sediment transport characteristics of natural rivers, the relative impact to Otay River and San Diego Bay from the onsite gradit and earthwork will be minor.
- 7. Change sentence on page 4.6-13 under "Municipal-Permit" as follows: To assure compliance with NPDES storm water rules, a storm water monitoring station equipped with an automatic storm water sampler will be incorporated into regional Detention Basin G3 (Number 1 in figure 4.6-2).
- 8. Change sentence on page 4.6-14 under "Mitigation Measures" as follows: During construction, the following measures should be included in construction plans to prevent onsite erosion and to maintain natural offsite transport of sediment:
- 9. Change sentence on page 75 of the Draft East Otay Mesa Specific Plan under "Storm Water Drainage Policy Implementation" as follows: Ongoing maintenance of the regional detention facilities will be the responsibility of the benefiting property owners and will be funded through assessments levied on benefiting properties by the County Flood Control District.

When the above comments have been incorporated into the Draft EIR, the Draft EIR will be ready for public review.

If you have any questions regarding this matter, please contact Robert Hoglen at (S.C. S50) 694-3244.

SJR:MKJ:meh

cc: SR125 file; Gary Fink, DPLU (0650); Steve Denny, DPLU (0650); Bob Asher, DPLU (0657); Brian Headrick, DPW (0336); Edgar Monroy, DPW (0338); Robert Wertz, DPW (0336); Ken Hanson, DPW (0336); Mark Carroll, DPLU (0650)

MEH:M:\WP\HOGLEN\MKJ238.MEM

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### San Diego County Archaeological Society, Toc

Environmental Review Committee
P.O. Box 81106 San Diego, CA 92138

January 11, 1994

To:

Mr. Gary Fink

Department of Planning and Land Use

County of San Diego

5201 Ruffin Road, Suite B San Diego, California 92123

Subject:

Draft Environmental Impact Report

East Otay Mesa Specific Plan GPA 94-02, Log No. 93-19-6

Dear Mr. Fink:

I have reviewed the cultural resources aspects of the subject DEIR on behalf of this committee of the San Diego County Archaeological Society.

Based on the contents of the DEIR and its cultural resources technical report, we have the following comments:

- (1) As a program level EIR for cultural resources in the SPA, the information generated essentially serves as a definition of the constraints these resources present for projects in the area. Specific future projects will each require consideration, which will include testing of sites identified in the report for this project. However, given the substantial times which may elapse, or have already elapsed, between the time of the survey of a particular parcel and the project level EIR, it would be appropriate to provide guidance for the circumstances which will require resurveying of that parcel. Presumably, this would be on the order of five years.
- (2) The technical report has missed a few reports of previous research in the Otay Mesa area. One was done by Smith and Moriarty for the City of San Diego, for Brown Field. Another is an SDSU Master's thesis on Otay Mesa settlement patterns, by Mary Robbins-Wade. Neither of these will affect the usefulness of the DEIR as a planning document, but they should have been included in the overview.
- (3) Although the Tax Factor aerial photographs are referenced in the technical report, the discussion of historic resources (p. 4-1) does not clearly state if the photos were checked.
- (4) The program level EIR probably provides a good perspective to address the potential of archaeological sites which should be considered together, as districts.

(5) The concept, discussed in the cultural resources management plan, of the possibility of an interpretive center/museum is a good one. We would suggest consideration also be given to making some provision for eventual development of syntheses of the research completed over the SPA. This could be done by providing for scholarships or grants to graduate students who would do their theses on data generated by the project level mitigation programs in the SPA. This would not involve large amounts of money, and would be beneficial to the interpretive center/museum, the students, the universities, and the public which would use the center.

Thank you for providing SDCAS with this opportunity to review the DEIR for this project.

Sincerely,

James W. Royle, Jr. Chairperson Environmental Review Committee

cc: Ogden Environmental and Energy Services
Gallegos and Associates
SDCAS President
file

#### DEPARTMENT OF TRANSPORTATION

DISTRICT 11, P.O. BOX 85406, SAN DIEGO, \$2186-5406 (619) 688-6424 TDD Number (619) 688-6002



January 13, 1994

11-SD-125 0.0-11.2 11-SD-905 5.7-14.0

Mr. Gary Fink
County of San Diego
Department of Planning
and Land Use
5201 Ruffin Road, Suite B
Mail Station 0650
San Diego, CA 92123-1666

Dear Mr. Fink:

DEIR and Specific Plan for East Otay Mesa (GPA 94-02, Log 93-19-6, SCH 92101099)

Thank you for the opportunity to review the subject documents. Our comments are enclosed (2 pages). Our contact person for your project area is Charles Stoll, Project Manager, Privatization Branch, (619) 338-8385 or (619) 688-6136.

Sincerely,

BILL DILLON, Chief Planning Studies Branch

BD/MO:ce

From : Department of Transportation

DISTRICT 11 PRIVATIZATION

Subject: Comments on the October 1993 Draft EIR (GPA 94-02; Log No. 93-

19-6) and Specific Plan for the East Otay Mesa (County of San

Diego)

#### EIR Comments:

Pg 3-14, Clarify that the possible extension of SR-905 would actually be a new State Highway from the Route 905/125 interchange to a possible new Port of Entry to the east of the Otay Mesa POE.

Pg 4.7-10 & 17, "State Route 125 (SR-125)", clarify that Route 125 is ultimately planned for eight SOV lanes and capacity for either 2 HOV lanes or light rail transit (not "ten lanes"). Construction could commence as early as 1996 and could be complete in 1998 (use same dates in SPA Pg 38). The reference to CTV as evaluating several Route 125 lignments should be eliminated - Caltrans is in the lead on the studies. Should add that our August 1993 Alternatives Report eliminated further study on the S-1 (Johnson Canyon) alternative due to extensive impacts to sensitive biological resources.

#### SPA Comments:

Pg 38, last paragraph, should change first word from "four" to "several."

Pg 39, first paragraph, should add that our August 1993 Alternatives Report eliminated further study on the S-1 (Johnson Canyon) alternative due to extensive impacts to sensitive biological resources.

Pg 39, "State Route 905 (SR-905)", Route 905 is ultimately planned for eight SOV and 2 HOV lanes (not an eight lane freeway). The franchise agreement with CTV limits the construction of Route 905 to six SOV plus 2 HOV lanes during the franchise period.

Pg 40, last paragraph, clarify that the possible extension of SR-905 would actually be a new State Highway from the Route 905/125 interchange to a possible new Port of Entry to the east of the Otay Mesa POE.

Pg 55, third paragraph, the proposed extension of Route 905 to Heritage Road as an interim circulation mitigation assumes that Route 125 is not constructed between Routes 905 and 54. This should be clearly stated.

Pg 56, "Possible International Border Crossing and Possible SR-905 Extension" (Subtitle) should read "Possible International Border Crossing and Possible New Highway Extension East of the 125 905 Interchange."

Pg 82, "2. Fair Share Contribution to Off-Site Roads, If Required", it seems that the construction of Route 125 may present the most preferred alternative. At minimum, the 905 extension to Heritage and Route 125 should be pursued/encouraged with the same level of effort/priority.

#### General Comments:

It is stated several times in both documents that the Route 125 project extends to the "Otay Mesa International Border Crossing." The southern terminus of Route 125 is Route 905. Route 905 terminates at the Otay Mesa International Border Crossing.

Several figures in both documents show a proposed full-service interchange at Route 125 and Lonestar Road. Recent traffic forecasting studies have shown extremely low volumes for the proposed ramps to and from the south at this interchange. The S-2 alignment (which is now the focus of the Route 125 environmental studies in the vicinity) would discourage trips on these ramps to an even greater extent than previous forecasts using the S-1 alignment. It has therefore been proposed that a "half-diamond" interchange design with access to and from the nort only be constructed at Lonestar Road.

James Emercian of Principal Accordings

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Laurence Courty of Los Dage

Juan Vergue Committees City of Juan Despo

The Nation Major Cary of Chaile Visi

January 13, 1994

TO:

County of San Diego, Planning and Land Use Department

ATTN:

Mark Carroll

FROM:

Otay Valley Regional Park Joint Staff

SUBJECT:

Review of the Draft Otay Mesa Specific Plan

(November 1993) and associated Draft Site Planning and Design Guidelines (October 1993) and Draft Environmental

Impact Report (October 1993).

The East Otay Mesa Specific Plan area is partially located within the Focus Planning Area (FPA) of the Otay Valley Regional Park OVRP). The Specific Plan has been reviewed for consistency with the OVRP Progress Plan and the OVRP Goal Statement.

#### SUMMARY

The East Otay Mesa Specific Plan is not consistent with the OVRP Goal Statement and Progress Plan. Implementation of the Specific Plan in its current form would result in the loss of area planned for open space, restrict or close off wildlife corridors and would jeopardize trail corridors in Johnson and O'Neal Canyons that are needed for trail access into the regional park and BLM adjacent lands.

The Specific llan, Draft Site Planning and Design Guidelines, and the Draft EIR have each been reviewed and recommendations made for revisions.

A compilation of "Specific Comments" has been made from the reviews made by individual members of each jurisdiction and is available to County of San Diego's Planning and Land Use Department, OVRP Policy Committee and Citizen Advisory Committee members, and interested parties upon request.

#### SPECIFIC PLAN

#### General Comments and Recommendations

The proposed land uses within the OVRP FPA portion of the Specific Plan are not consistent with the OVRP Goal Statement and land uses (natural Open Space Preserve and Trails) proposed by the OVRP Progress Plan. Therefore we recommend the Specific Plan be revised by:

- modifying the Land Use Plan (Figure 2-7) to include an Open Space category, and
  - designate as Open Space those areas within and adjacent to the OVRP FPA. This would include the areas identified in Johnson and O'Neal Canyon and the eastern slopes adjacent to O'Neal Canyon;
  - designate as Open Space those areas adjacent to the OVRP FPA that include steep slopes and biologically sensitive areas as shown on the Conservation Plan (Figure 2-8);
- changing the Open Space Plan (Figure 2-9) to shift the trail corridor southward, within the FPA boundaries, to assure OVRP trails will be implemented in Johnson Canyon;
- changing the Alternate Wastewater Facilities Plan (Figure 2-26) to identify an alternate site for the proposed wastewater collection and treatment reservoir site in O'Neal Canyon. The proposed site conflicts with proposed OVRP trail alignments;
- correcting the Sensitive Resources Area, "G" Designator Map (Figure 3-35) to accurately reflect the Conservation Plan (Figure 2-8) and Open Space Plan (Figure 2-9);
- modifying the Development Standards by
  - requiring a rear yard setback (none stated in the Standards) for all development adjacent to the OVRP FPA, and
  - requiring a stated amount of usable open space (none required by the Standards) for commercial and industrial to compensate for the lack of public facilities in the SPA; and
- and modifying Conservation and Open Space Policies by

- incorporating into Policy COS-3 (pg. 35) that OVRP Joint Staff, Citizen Advisory Committee and Policy Committee will be involved in coordinating with County Staff any trail corridor alignments or modifications; and
- incorporating into Policy COS-4 (pg. 35) that OVRP Joint Staff, Citizen Advisory Committee and Policy Committee shall have the opportunity to review any proposed development within the FPA.

#### DRAFT SITE PLANNING AND DESIGN GUIDELINES

#### General comments and Recommendations

- Revise the Site Planning and Design Guidelines by
  - adding criteria for industrial use areas located within or adjacent to the OVRP FPA (specifically, those located on the industrial area near Johnson and O'Neal Canyons). These criteria should address grading, setbacks, architectural design and landscaping adjacent to the canyon edge and sensitivity to the OVRP open space preserve; and
  - adding requirements for linked pedestrian and bicycle circulation within the project sites to connect to off site trail systems.

#### DRAFT ENVIRONMENTAL IMPACT REPORT

#### General Comments and Recommendations

Although none of the alternatives are completely consistent with the OVRP Progress Plan and Goal Statement, the Environmentally Preferred Alternative poses the least impacts to Johnson and O'neal Canyons and the OVRP. None of the alternatives support implementation of the regional trail system and this seriously compromises OVRP's ability to achieve its established goals. Other negative impacts of the proposed plan on the OVRP are to Land Use, Landform Alteration/Visual Quality, Biological Resources, Circulation, Noise and Lighting.

We recommend that the Draft Environmental Impact report be revised by:

- changing the report to reflect changes previously recommended for trails in the Specific Plan;

- applying a special designation of "Residential/Open Space" and/or "Industrial/Open Space" to the appropriate areas; and
- ensuring the language in the Specific Plan and the DEIR is consistent and that the intent and evaluation of the above item is clearly discussed.

Jani Entran a' Parista

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iena Varpio Constituto Cory el Sen Durpo

Tim Heder Mayor City of Chais Visi

January 13, 1994

TO:

Otay Valley Regional Park Policy Committee and Citizen Advisory Committee Members, County of San Diego Planning Department, and Interested Parties

FROM:

Otay Valley Regional Park Joint Staff

SUBJECT:

Specific Comments And Recommendations, And Editored Recommendations From Review Of The Draft Otay Mesa Specific Plan (November 1993) And Associated Draft Site Planning And Design Guidelines (October 1993) And Draft Environmental Impact Report (October 1993).

#### SPECIFIC PLAN

Specific Comments - City of Chula Vista (Frank J. Herrera-A)

Page 32, last paragraph, and page 34, Figure 2-9; The plan discusses the alignment of the trail corridor in Johnson Canyon which is located further north than the alignment proposed by the OVRP Progress Plan. The Alignment is located outside of the Specific Plan area and within the jurisdictional boundaries of the Donovan State Correctional Facility. The trail corridor should be moved southward through the extension of Johnson Canyon, in order that it may be located within the Specific Plan boundaries, thereby insuring that trail easements be addressed as part of future Specific Plan project review.

Suggest revising the designation of those areas adjacent to or within the OVRP FPA to Open Space. The topographically-defined contours for Johnson Canyon should be allowed to extend within the Specific Plan area and the trail system linked from the River Valley to activity centers within the Specific Plan Area. O'Neal Canyon and the eastern foothill slopes adjacent to O'Neal Canyon should also be designated as Open Space. This area, adjacent to Donovan Prison the County Jail facilities is not appropriate for residential.

- * Page 35. Policy COS-1: The last paragraph of the Implementation section states "It is also the intent of the Plan that areas zoned for Rural Residential be acquired or exacted for open space as a potential means of mitigating environmental impacts of industrial or commercial development...". This statement should be further examined in view of certain restrictions which may be imposed by Federal, as well as State agencies regarding what uses if any may placed on areas that are designated for open space, once they have been designated for mitigation of other uses i.e., industrial commercial.
- * Page 35, Policy COS-3 and Implementation; The OVRP Joint Staff, Citizens Advisory Committee, and Policy Committee will work with County staff to coordinate modifications to trail corridors, which may impact the OVRP/FPA.
- * Page 35, Policy COS-4, Implementation: Add the recommendation (requirement) that any proposed development located within the OVRP FPA may also be reviewed by the OVRP Joint Staff, Citizen Advisory Committee, and Policy Committee.
- * Pages 68-71, Section 2.5.2, Wastewater Collection and Treatment: This section discusses an alternative to the Metro and Clean Water Program system which would include an on-site treatment facility and two alternative wet weather storage reservoirs. Figure 2-25 indicates both reservoir sites are true be located in the foothills. Reservoir Option 2, is located at the upper end of O'Neal Canyon, directly adjacent to the OVRP FPA. This site conflicts with the future trail alignment proposed by both the OVRP Progress Plan and the East Otay Mesa Specific Plan. In addition to land use conflicts, this option would create a negative visual impact to the proposed regional park unless properly positioned and screened. Staff does not support this option, and recommends that it be deleted from the Specific Plan.

Specific Recommendations - City of San Diego - (Howard Greenstein)

1. Page 32. Last Paragraph, and Page 34. Figure 2-9: The plan discusses the alignment of the trail corridor in Johnson Canyon, which is located further north than the alignment proposed by the OVRP Progress Plan. This alignment appears logical based on existing contours, however the alignment is located outside of the Specific Plan area and within the jurisdictional boundaries of the Donovan State Correctional Facility. We will need written confirmation from the State that this alignment is acceptable, and that a trail easement will be dedicated in the future. If these assurances cannot be provided, then we would recommend that the trail corridor be moved slightly southward, so that it is located within the

Specific Plan Boundaries, thereby insuring that trail easements or dedications are addressed as part of future Specific Plan project review.

- 2. Page 35, Policy Cos-1: The last paragraph of the Implementation section states "It is also the intent of the Plan that areas zoned for Rural Residential be acquired or exacted for open space as a potential means of mitigating environmental impacts of industrial or commercial development...". We support this concept, and recommend the addition of the following language: "Mitigation property should be located within, or adjacent to, the Otay Valley Regional Park Focused Planning Area, and dedicated to the County for inclusion in the regional park. Additionally, if a monetary contribution is to be made rather than acquisition of real property as mitigation, the money should be dedicated to the Otay Valley Regional Park for future acquisition or restoration use."
- 3. Page 35, Policy Cos-3 and Implementation: The OVRP Joint Staff, Citizen Advisory Committee, and Policy Committee will work with County staff to coordinate modifications to trail corridors, subject to the conditions discussed in item 1, above.
- 4. Page 35, Policy Cos-4, Implementation: Add the recommendation that any proposed development located within the OVRP FPA also be reviewed by the OVRP Joint Staff, Citizen Advisory Committee, and Policy Committee.
- Pages 68-71, Section 2.5.2, Wastewater Collection and Treatment: This section discusses an alternative to the Metro and Clean Water Program system which would include a on-site treatment facility and two alternative wet weather storage reservoirs. Figure 2-25 indicates both reservoir sites to be located in the foothills. Reservoir Option 2 is located at the upper end of O'Neal Canyon, directly adjacent to the OVRP FPA. This site conflicts with the future trail alignment proposed by both the OVRP Progress Plan and the East Otay Mesa Specific Plan. In addition to land use conflicts, this option would create a negative visual impact.

Editorial Recommendations - City of San Diego (Howard Greenstein)

Page 18, Figure 1-4: This figure is incorrect. The Otay Mesa Community Plan designates residential uses in the northeast quadrant of the intersection of routes 805 and 905. A small area between the residential area and Brown Field is designated industrial. The Otay Valley, indicated on the figure by "Otay Valley Regional Park", should occur north of the residential area that is north of route 905 (route 905 does not run through the valley). Contact the City of San

Diego Planning Department (Long Range and Facilities Planning Division) and see the Otay Mesa Community Plan (April 1981) for corrections.

- 2. <u>Page 3-13, Figure 3-6:</u> The trail corridors through Johnson and O'Neal Canyons should be added to the Circulation and Transit Plan.
- 3. Page 4.1-21. Figure 4.1-9: The OVRP FPA boundary extends into the southern end of Johnson Canyon, within the Specific Plan area. This area should be included in Figure 4.1-9.
- 4. Page 4.3-41, Parks and Open Space, First Paragraph: In addition to Johnson Canyon, the OVRP FPA also includes the major portion of O'Neal Canyon.

Specific Comments - County Parks and Recreation (Ken Gengler)

- 1. Page 21. Environmental Resources and Constraints Study

  The "G" designator as proposed to be indicated in figure 3-55 does not show up on Johnson Canyon's western slopes; the area of the OVRP.
- 2. <u>Page 32.</u> The trail corridor proposed and illustrated on Figure 2-9 are on State of California Land (prison).
- 3. <u>Section 2.5</u> Parks and Recreation are not a consideration under public facilities.

#### SITE PLANNING AND DESIGN GUIDELINES

No specific comments.

#### DRAFT ENVIRONMENTAL IMPACT REPORT

Specific Comments - City of Chula Vista (Frank J. Herrera-A)

- * Page 4.1-31, Impacts Related to The Otay Valley Regional Park; For comments on the discussion of implementation of the trail system, see SPECIFIC PLAN, Specific Comments.
- * Page 4.1-35, Item 8; The proposed mitigation measure "... the County shall re-evaluate each proposed plan and come to an agreement on which type of land use is most appropriate for the canyon, i.e., Hillside Residential and Industrial development ... or Natural Open Space Preserve ..." is not explicitly discussed in the actual Specific Plan. By designating residential or industrial land use, the maker of the Plan is already indicating a predisposition to a decision in favor of a non-park land use.

- Page 4.2-17. (Mitigation Measures 4.2.4); Item 2 does not adequately address landform alteration and visual impacts caused by industrial development in the upper portion of Johnson Canyon.
- Page 3-13, Figure 3-6: The trail corridors through Johnson and 5. O'Neal Canyons should be added to the Circulation and Transit 5. Plan.
- * Page 4.1-21, Figure 4.1-9; The OVRP FPA boundary extends into the southern end of Johnson Canyon, within the Specific Plan area. This area should be included in Figure 4.1-9.

Specific Recommendations - City of San Diego (Howard Greenstein)

- Page 4.1-31, Impacts Related to the Otay Valley Regional Park:
  For comments on the discussion of implementation of the trail system, see SPECIFIC PLAN, Specific Recommendations, Item 1, above.
- Page 4.1-35, Item 8: The proposed mitigation measure "... the county shall re-evaluate each proposed plan and come to an agreement on which type of land use is the most appropriate for the canyon, i.e., Hillside Residential and Industrial development ... or Natural Open Space Preserve ... " is not explicitly discussed in the actual Specific Plan. By designating residential or industrial land use, the Plan is already indicating a predisposition to deciding in favor of a non-park land use. As a compromise, we recommend the following:
  - a) Apply a special designation of "Residential/Open Space" or "Industrial/Open Space" to the appropriate areas.
  - b) Discuss clearly in the Specific Plan the intent of these designations, explaining the evaluation/decision-making process described above.
- 3. Page 4.7-17. Mitigation Measures (4.2.4): Item 2 does not adequately address landform alteration and visual impacts caused by industrial development in the upper portion of Johnson Canyon.
- Page 4.7-27. Pedestrian Circulation, Third Paragraph: Add:
  "Development should be designed to encourage walking between all uses and the proposed Otay Valley Regional Park trail systems."

Editorial Recommendations - City of San Diego (Howard Greenstein)

Page 3-10, Conservation and Open Space Element: The discussion in this element is very confusing. It states that "The areas with 'G' Designator include ... all of the Hillside Residential district", yet Figure 3-4 does not indicate that the 'G' Designator is applied to the residential district in the northwest portion of the Plan area, adjacent to Johnson Canyon; which is correct?

Additionally, the discussion of the Open Space Plan and Figure 3-5 are also confusing. "The Open Space Plan ... uses the 'G' Designator ... to protect environmentally sensitive lands." It appears that Figure 3-4 is inconsistent with Figure 3-5 please explain this. Is the 'G' Designator applied to the residential area adjacent to Johnson Canyon? What is the purpose of the Open Space Plan?

Specific Comments - County Parks and Recreation (Ken Gengler)

- 1. <u>Circulation Element</u> (page 3-14) is Alta Road designated as a "Prime Arterial" or as a right-of-way subject to future 12 studies?
- 2. Otay Valley Regional Parks Preliminary Progress Plan (Eastern Half Only) (Figure 4.1.9). The Focused Planning Area (FPA) boundary extending into the southern end of Johnson Canyon has been left off the map.
- 3. <u>Mitigation Measures</u> (page 4.1-35) No mitigation is offered for the Hillside Residential and Industrial development impacts on the Otay Valley Regional Park.
- 4. Impacts (page 4.2.14) The visual impacts of residential and 15 industrial development on the Otay Valley Regional Park's viewshed are not addressed.
- 5. Parks and Open Space (page 4.3-41) No mention is made of recreation facilities available with the Olympic Training /(Center and the City of San Diego Boat Dock and fishing facility.



THE CITY OF

# SAN DIEGO

CITY OPERATIONS BUILDING • 1222 First Avenue • M.S. 501 • San Diego, California 92101

OFFICE OF PLANNING DEPARTMENT 236-6460

January 14, 1994

Gary Fink
Department of Planning and Land Use
County of San Diego
5201 Ruffin Road, Suite B
San Diego, CA 92123-2960

SUBJECT: COMMENTS ON EAST OTAY MESA SPECIFIC PLAN, GPA 9402, LOG NO. 93-19-6 AND THE DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE EAST OTAY MESA SPECIFIC PLAN

Dear Mr. Fink:

Thank you for the opportunity to review and comment on the subject Specific Plan and draft Environmental Impact Report (DEIR). It appears that the City of San Diego is not a responsible agency; however, because of our proximity to the project, we would like to offer the following comments on the DEIR:

#### • LAND USE

Otay Valley Regional Park. As a partner in the development of the Otay Valley Regional Park, the City of San Diego is vitally concerned about actions that might hinder the success of this venture. In reviewing the Specific Plan DEIR, it is apparent that there are land use inconsistencies between the Otay Valley Regional Park Progress Plan and the proposed East Otay Mesa Specific Plan that have not been adequately mitigated. Please refer to Attachment A for detailed comments.

<u>Policy Inconsistencies</u>. Timing of the Specific Plan revision to include a Comprehensive Open Space System was omitted (Page 4.1-35). To adequately mitigate the potential impacts of this issue, this task should be accomplished prior to plan adoption. The system should include buffers for edge effect impacts.



Gary Fink January 14, 1994 Page 2

#### • CIRCULATION

A number of assumptions in the Circulation Element regarding streets within the City of San Diego are incorrect or unacceptable to the City of San Diego, and as a consequence, the proposed circulation mitigation is inappropriate and inadequate. These are issues that must be resolved prior to plan adoption. Please refer to Attachment B for detailed comments on these issues and on other errors and omissions in the document.

#### HYDROLOGY/FLOOD CONTROL

City of San Diego staff has calculated that a minimum of 700 acres of the Specific Plan area drains to the City of San Diego streets (Attachment C). These areas of the City of San Diego already have drainage problems caused by runoff from this unincorporated area. Once development occurs, more runoff will be received and the City may be dealing with much greater drainage problems. To assure adequate mitigation of the above impact, DEIR mitigation should include provisions for review and comment by City of San Diego engineering staff for all projects that drain onto City lands.

#### ALTERNATIVES

All reasonable alternatives have not been considered. A more environmentally sensitive alternative not proposed is that of a more mixed and balanced land use pattern. Such a plan would introduce urban— and suburban—density residential uses and reduction of industrial and commercial acreage. We suggest that such a community would have less environmental impacts, particularly, by reducing traffic and pollution and promoting transit use (Please refer to Attachment D).

#### MITIGATION MONITORING AND REPORTING

In our response to the Notice of Preparation, we raised the issue of a Mitigation Monitoring and Reporting program as required by Public Resources Code Section 21081.6. The requirement for a program is acknowledged on page 1-2 as being included in the DEIR; however, it isn't there.

Comments on the Specific Plan including the Circulation Element will be found in Attachments A, B and D.

Gary Fink January 14, 1994 Page 3

We look forward to receiving the final EIR when it becomes available. Please feel free to contact Mary Roush at (619) 236 6525 should you have any questions

Sincerely,

Ann B. Hix, Principal Planner City Planning Department

ANH: MR

Attachment A: Comments on the Specific Plan and DEIR Regarding

the Otay Valley Regional Park

Attachment B: Comments Regarding the Circulation Element

Attachment C: Map of Drainage Areas

Attachment D: Comments on Proposed Specific Plan Land Use Concepts

CC: Jeff Washington, Long Range and Facilities Planning Mike Stang, Long Range and Facilities Planning Bill Levin, Long Range and Facilities Planning Howard Greenstein, Long Range and Facilities Planning

Mike Maria, Flood Plain Management Gary Halpert, Transportation Planning

#### ATTACHMENT A

Comments on the East Otay Mesa Specif Plan and DEIR regarding the Otay Valley Regional Park.

Prepared by: Howard Greenstein, City of San Diego

Project Manager for the Otay Valley Regioanl Park

The East Otay Mesa Specific Plan area is partially located within the Focused Planning Area (FPA) of the Otay Valley Regional Park (OVRP). The Specific Plan, Design Guidelines, and DEIR have been reviewed for consistency with the OVRP Progress Plan and the OVRP Goal Statement.

#### SUMMARY

The Specific Plan is not consistent with the OVRP Progress Plan. We, therefore, cannot support the Specific Plan as proposed, and recommend the following modifications:

Revise the Plan by designating as Open Space those areas within, and adjacent to, the OVRP FPA. This would include the property within Johnson and O'Neal Canyons, and the eastern foothill slopes adjacent to O'Neal Canyon.

A detailed explanation for the above position, and additional recommendations, follow:

#### SPECIFIC PLAN

#### General Comments and Recommendations

The proposed land uses (Rural Residential and Mixed Industrial) within the OVRP FPA portion of the Specific Plan (the area on and adjacent to Johnson and O'Neal canyons) are not consistent with the land use (Natural Open Space Preserve) proposed by the OVRP Progress Plan.

#### Specific Recommendations

1. Page 32. last paragraph, and page 34. Figure 2-9: The plan discusses the alignment of the trail corridor in Johnson Canyon, which is located further north than the alignment proposed by the OVRP Progress Plan. This alignment appears logical based on existing contours, however the alignment is located outside of the Specific Plan area and within the jurisdictional boundaries of the Donovan State Correctional Facility. We will need written confirmation from the State that this alignment is acceptable, and that a trail easement will be dedicated in the future. If these assurances cannot provided, then we would recommend that the trail corridor amoved slightly southward, so that it is located within the

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#### Editorial Recommendations

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1. Page 18. Figure 1-4: This figure is incorrect. The Otay Mesa Community Plan designates residential uses in the northeast quadrant of the intersection of routes 805 and 905. A small area between the residential area and Brown Field is designated industrial. The Otay Valley, indicated on the figure by "Otay Valley Regional Park", should occur north of the residential area that is north of route 905 (route 905 does not run through the valley). Contact the City of San



Diego Planning Department (Long Range and Facilities Planning Division) and see the Otay Mesa Community Plan (April 1981) for corrections.

#### SITE PLANNING AND DESIGN GUIDELINES

# General Comments and Recommendations

The Design Guidelines should include design criteria for the industrial use areas that are located within, or are adjacent to, the OVRP FPA (specifically, the northern industrial area near Johnson and O'Neal Canyons).

This criteria should address grading, setbacks, architectural design, and landscaping adjacent to canyon rims. The criteria should also address pedestrian and bicycle circulation from within the project sites to connect to the proposed trail system.

#### DRAFT ENVIRONMENTAL IMPACT REPORT

#### General Comments and Recommendations

The DEIR describes numerous potential significant impacts to the portions of the Specific Plan within the OVRP FPA, including Johnson and O'Neal Canyons. In particular, the DEIR indicates (Page 4.3-67) that O'Neal Canyon is rich in high quality habitat, biological resources and sensitive species such as Coastal Sage Scrub, California Gnatcatcher, Bobcat, Mountain Lion and Mule Deer, and serves as the primary regional wildlife corridor linking the Otay Valley to the San Ysidro Mountains and BLM lands. Johnson and O'Neal Canyons must be preserved as open space.

Although we do not completely support any of the Plan alternatives, we prefer the Environmentally Preferred Alternative. This alternative poses the least impacts to Johnson and O'Neal Canyons and the proposed regional park.

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#### Specific Recommendations

- 1. Page 4.1-31. Impacts Related to the Otay Valley Regional Park: For comments on the discussion of implementation of the trail system, see SPECIFIC PLAN, Specific Recommendations, Item 1, above.
- 2. Page 4.1-35. Item 8: The proposed mitigation measure "... the County shall re-evaluate each proposed plan and come to an agreement on which type of land use is the most appropriate for the canyon, i.e., Hillside Residential and Industrial development ... or Natural Open Space Preserve ... is not explicitly discussed in the actual Specific Plan. By designating residential or industrial land use, the Plan is already indicating a predisposition to deciding in favor of a non-park land use. As a compromise, we recommend the following:
  - a) Apply a special designation of "Residential/Open Space" or "Industrial/Open Space" to the appropriate areas.
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and O'Neal Canyons should be added to the Circulation and Transit Plan.

- 3. Page 4.1-21. Figure 4.1-9: The OVRP FPA boundary extends into the southern end of Johnson Canyon, within the Specific Plan area. This area should be included in Fig. 4.1-9.
- 4. Page 4.3-41. Parks and Open Space. first paragraph: In addition to Johnson Canyon, the OVRP FPA also includes the major portion of O'Neal Canyon.

#### CITY OF SAN DIEGO MENORANDUM

FILE NO: 430 (East Otay Mesa)

DATE : January 11, 1994

TO: Mary Roush, Environmental Analysis Section, Development

and Environmental Planning Division, Planning

Department

FROM : Gary Halbert, Senior Traffic Engineer, Transportation

Development Section, Transportation Planning Division,

Engineering and Development Department

SUBJECT: REVIEW OF DRAFT CIRCULATION ELEMENT FOR SPECIFIC PLAN,

JOB ORDER NO. 117769

We have reviewed the draft Circulation Element for East Otay Mesa Specific Plan dated October 1993, and would like to provide the following comments:

1. A trip generation table should be included for the proposed 18 East Otay Mesa Project.

The recommended widening of City streets east of SR-125 corridor in Otay Mesa is not acceptable as a mitigation measure for the proposed East Otay Mesa development. The proposed development density should be reduced to a level which can be incorporated into the neighboring communities' approved street circulation system.

- 3. In Figure 4, the projected average daily traffic volume for SR-905 just east of SR-125 corridor is higher than the City's previous projections. The volumes shown in this draft circulation element indicate the freeway would be over capacity. Also, the projected average daily traffic volume for SR-125 should be reduced and reallocated to other routes to reflect satisfactory levels of service on the proposed private toll facility.
- 4. For Table 2, note (e) should be revised to reflect the City's Traffic Impact Study Manual dated August 1993 (see table 2, 2, page 7).
- 5. On Page III-16, the text should be revised to show that Siempre Viva Road is classified as a 6 lane primary arterial west of Enrico Fermi Drive. The recommended downgrading in the street classification for Piper Ranch Road is not recommended. Piper Ranch Road extends south of Otay Mesa Road to Airway Road which was not reflected in the roadway network shown in the draft circulation element.

- 6. Revise the roadway classifications as shown on the attached Figure 6.
- 7. The proposed widening of Otay Mesa Road to a 6 lane prime arterial would provide an additional capacity of about 10,000 ADT. This additional capacity would be utilized by the background growth of traffic from the Otay Mesa border crossing and from the previously approved developments in the Otay Mesa Community. The additional capacity created by this roadway improvement should be omitted for development considerations in the Transportation Phasing Plan.
- 8. For Page IV-1, the minimum roadway system needed to serve Phase 1 development of East Otay Mesa should include the construction of Airway Road from Loop Road to Enrico Fermi Drive and the widening of Airway Road to a 4 lane major street from Enrico Fermi Road to Heritage Road.
- 9. The proposed monitoring program should include the additional following locations:
  - Otay Mesa Road east of SR-125 corridor
  - Siempre Viva Road east of SR-125 corridor
  - Conestar Road east of SR-125 corridor
  - Airway Road east of SR-125 corridor
  - Palm Avenue east of I-805
  - Siempre Viva Road east of I-805
  - The border crossings
  - SR-905 east of I-805
  - Otay River crossings (Alta Road, SR-125, La Media Road and Heritage/Otay Valley Road).
- 10. For Page V-12, the traffic analysis should comply with the Congestion Management Program and provide peak hour level of service analysis for intersections, roadway segments and freeway segments within the neighboring communities.
- 11. In Appendix A, Page 5, Scenario 1-A, it would be acceptable as a first phase of development in East Otay Mesa if SR-905 would be widened to an 8 lane freeway from I-805 to Otay Mesa Road and SR-905 would be built as a 6 lane freeway from Otay Mesa Road to SR-125 corridor. In this revised Scenario 1-A, the SR-905 freeway would provide an additional capacity of about 100,000 ADT. Also, Otay Mesa Road will have been upgraded to a 6 lane primary arterial from SR-905 to the future SR-125 corridor.
- 12. For Appendix A, Page 5, Scenario 1-B would provide an additional capacity of about 30,000 ADT with the widening of SR-905 to a 6 lane freeway from I-805 to Otay Mesa Road. The termination of the freeway at Heritage Road creates situation where all westbound SR-905 freeway traffic would forced to pass through dual left turn lanes with limited capacity at the Heritage Road/SR-905 interchange (northbound to westbound left-turn move).

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- 13. In Appendix A, Page 8, Scenario II, the widening of Otay Valley Road would provide an additional capacity of about 25,000 ADT which should be considered as part of the East Otay Mesa Transportation Phasing Plan. The Otay Valley Road intersection with Otay Mesa Road would be the critical factor for keeping the capacity of Otay Valley Road limited as an initial phase corridor.
- 14. In Appendix A, Page 8, Scenario III, the implementing of the SR-125 freeway would provide an initial additional capacity of approximately 50,000 ADT with a 6 lane freeway. It should be anticipated that the toll facility designation will always keep the freeway demand limited. The demand will rise as congestion and delay on alternate routes becomes burdensome. The reliance on an upgraded Otay Mesa Road is not acceptable with the SR-125 toll facility. An additional east-west new corridor is needed to accommodate the non-toll traffic demand. A 4 lane interim arterial facility in the SR-905 freeway corridor from SR-905 to SR-125 would provide an additional 40,000 ADT and with the widening of SR-905 to an 8 lane freeway from I-805 to Otay Mesa Road.
- 15. The basis for equally dividing the future development rights in the Otay Mesa area between the City and the County lands is not clear. The City Council over the years had approved approximately 2,000 acres of industrial development which could be developed based on market demand.
- 16. Growth in border crossing traffic is estimated to increase dramatically in the next year as trucks are shifted from the San Ysidro crossing to Otay Mesa. Growth is expected to increase annually thereafter by about 12%. This additional traffic should be accounted for in the Transportation Phasing Plan for East Otay Mesa.

If you have any questions, please call Labib Qasem at 236-5966.

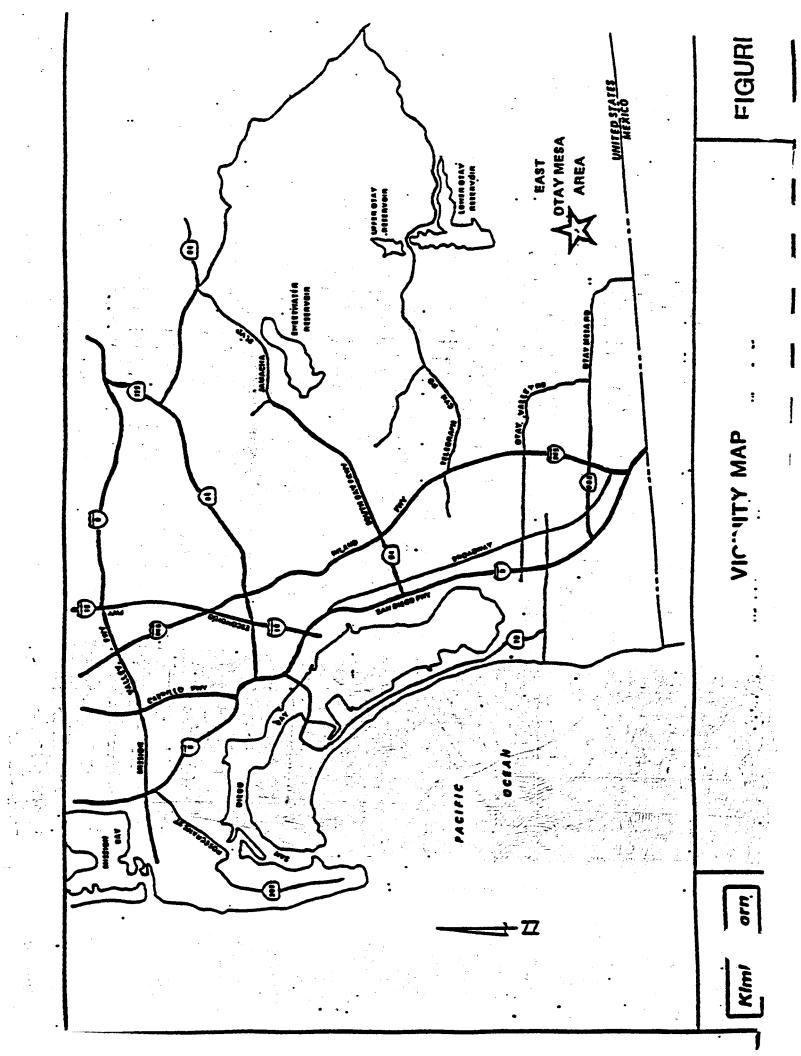
Gary Halbert

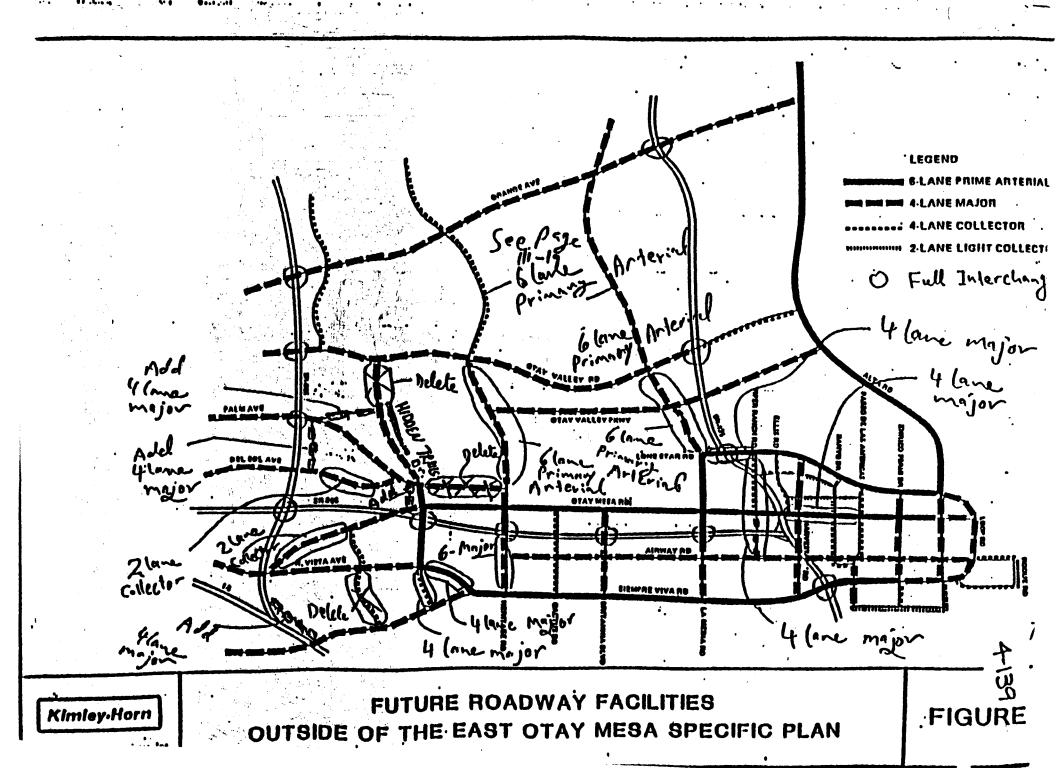
Senior Traffic Engineer

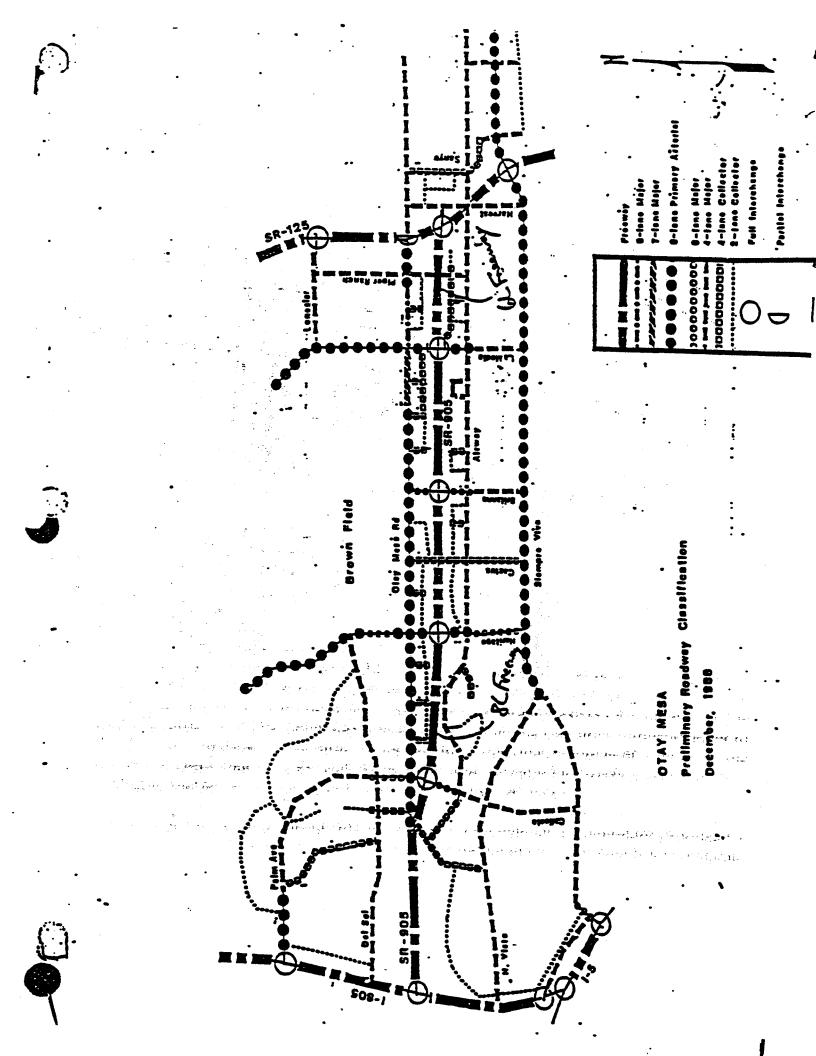
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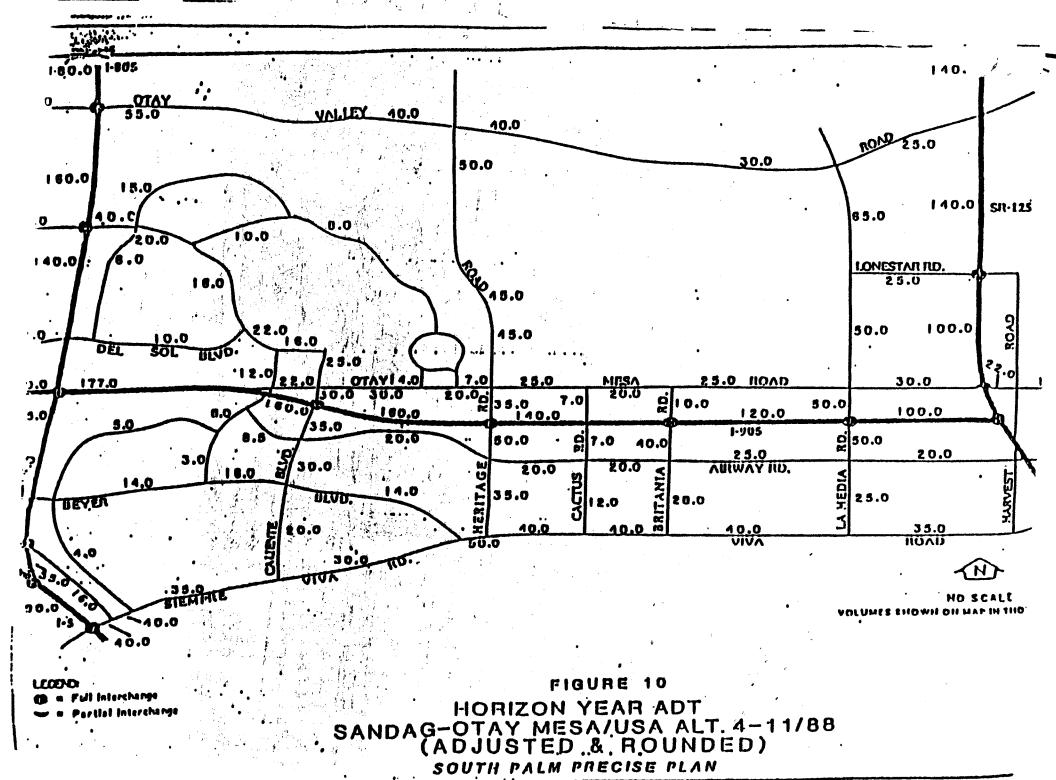
Attachments

cc: Mike Stang, M.S. 660
Larry Van Wey
George Qsar
Walt Huffman
Craig Tennesen
Linda Marabian
Edgar Perez

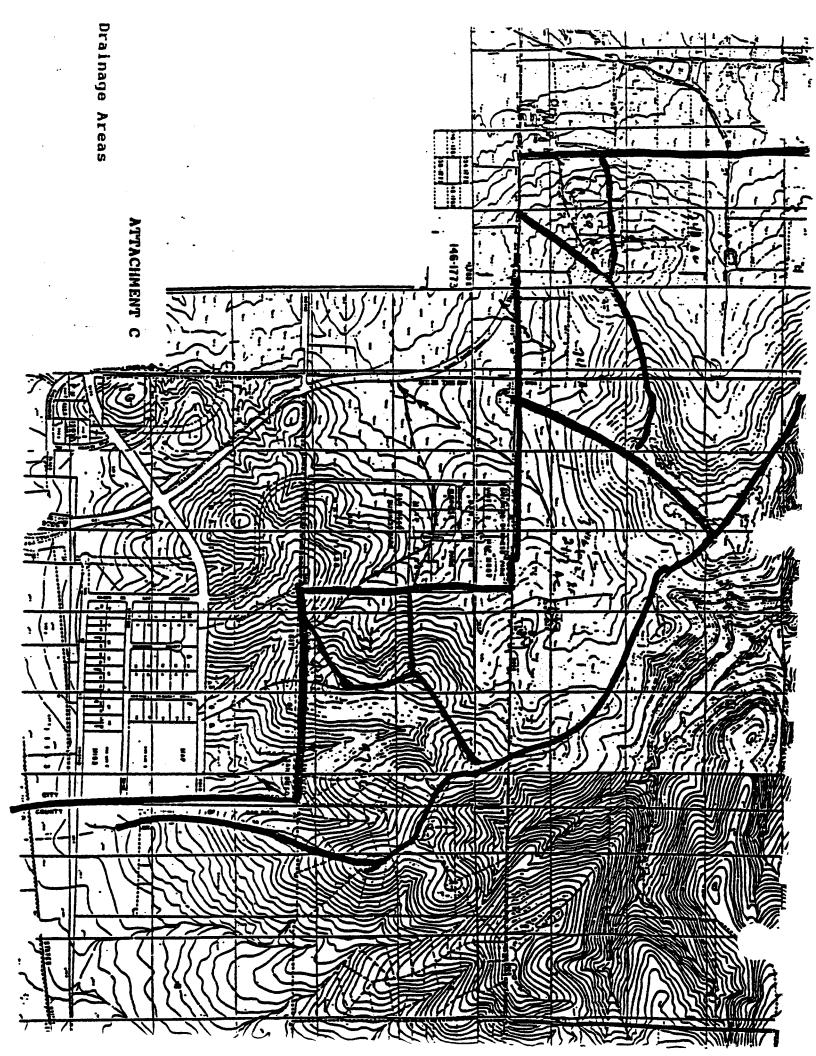








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Comments on Proposed Specific film

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Prepared by: Bill Levin, City of San Diego Senior Planner, Long Range and Facilities Planning

The Draft East Otay Mesa Specific Plan proposes that the majority of the Plan area be designated for mixed industrial use (2,350 acres). The other major urban use proposed is a 130 acre regional commercial center. The primary justification cited for these proposals is a market study which indicates strong demand and absorption for South Bay/Otay Mesa industrial land.

The City's experience and projections regarding industrial absorption in Otay Mesa is in marked contrast with the projections cited in the Draft Plan. The Draft Plan anticipates that the City's Otay Mesa industrial acreage will be absorbed as early as 2007. Our own projections, based on our 1983-1993 experience and discussions with developers and others active in Otay Mesa real estate, is that a 50-75 year supply of industrial land already exists in Otay Mesa. Tentative maps have been approved for approximately 37 industrial parks covering 3,000 acres within the City's portion of Otay Mesa (see Attachment 1). Nearly all of these industrial parks were initiated in the mid to late 1980s. No new applications for tentative maps have been submitted since 1989 although much unmapped, industrially designated land remains in Otay Mesa. Only a handful of the industrial parks initiated in the late 1980s have experienced any industrial development. Most have sat virtually vacant for the past Some feature expensive street landscaping that may have to be abandoned due to ongoing maintenance costs. In others, weeds are now growing through cracks in the pavement of unused roads. Our estimate of 50-75 years to build out the Otay Mesa industrial area under City jurisdiction assumes a higher level of annual absorption than has occurred during the past five years and assumes that NAFTA and the maquilladora programs will spur steady development in the years ahead.

The availability of commercially designated land in Otay Mesa is even more excessive than industrial land. Approximately 600 acres of Otay Mesa land are currently designated for commercial use. At present, only about 20 acres are developed for commercial use. Even assuming increased absorption in years ahead, we believe that a 100 year supply of commercially designated land already exists. It should be noted that the largest commercially designated areas within the City are located adjacent to the border crossing. The area proposed for a regional commercial center in the County's Draft Plan is less well located vis a vis the border crossing and therefore probably would not be competitive during the next 20 years.

We do not believe that either the industrial or commercial development proposed in the Draft County Specific Plan would be viable within the 20 year time frame generally utilized for community and specific plans. This view in large part reflects many conversations we have had with individuals active in South Bay real estate. It should also be noted that the terrain proposed for industrial and commercial development within County jurisdiction has substantially more relief that the City's industrial area (see Attachment 1). This could make the County land somewhat more expensive to

develop and less competitive with the City's industrially designated land which is nearly flat and requires little or no grading and landform alteration.

We offer these observations not to suggest that designation of County land for industrial and commercial use is inappropriate. Rather we would suggest that the proposed mix of uses is unbalanced and does not mesh with economic realities or predicted demand for various uses. We would suggest that consideration be given to a more mixed and balanced land use pattern with introduction of urban and suburban density residential uses and reduction of industrial and commercial acreage.

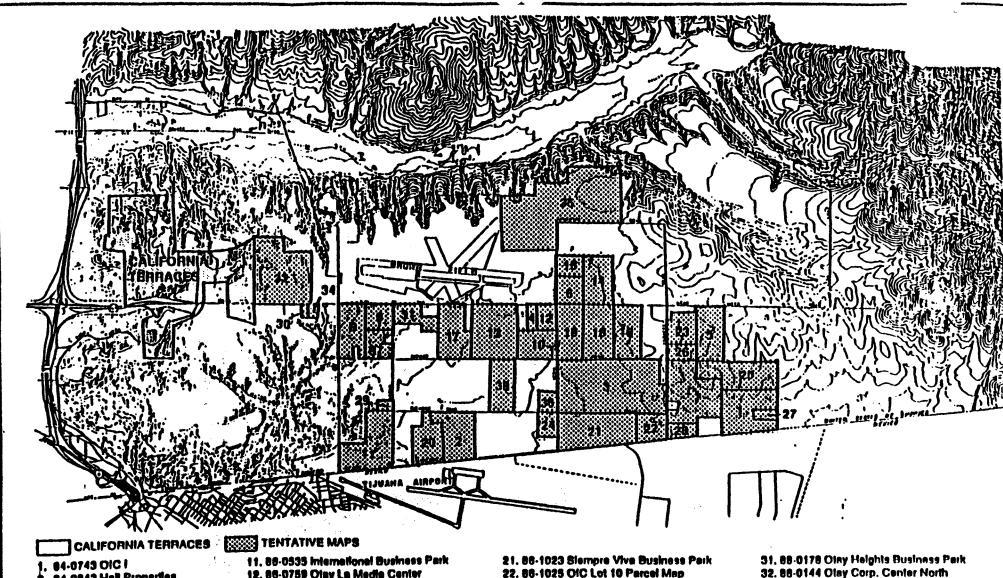
We suggest that residential development at urban and suburban densities might be appropriate, particularly in the eastern portion of the planning area. There are several reasons for this suggestion:

- 1. Housing should be provided near the industrial land (and jobs) proposed for the County's portion of Otay Mesa. Provision of housing near jobs is consistent with City, County and SANDAG goals for reducing traffic and pollution and promoting transit use.
- 2. Unlike the situation for industrial and commercial land, all projections we have seen indicate that there continues to be a shortage of land available for residential development throughout San Diego County. This shortage is likely to get worse as the economy improves.
- 3. Residential development previously anticipated in western Otay Mesa and the Otay Ranch area may need to be scaled back significantly because of limitations likely to be imposed by the State and Federal governments on developing land occupied by the threatened California gnatcatcher.
- 4. The area proposed for industrial development in the Draft Specific Plan, while steeper than the City's adjacent industrial acreage, is flatter and probably more suitable for residential development than much of the land in western Otay Mesa and Otay Ranch.

# CONCLUSION ...

The City's Otay Mesa Plan seeks to promote a balanced community with a mix of residential, commercial and industrial uses. We are hopeful that the County will consider a similar mix of uses. We are grateful for the opportunity to comment on the Draft Plan and look forward to continuing to work with you on this important project.

Attachment: 1. Otay Mesa Map Illustrating Tentative Maps and Terrain Relief



84-0843 Hall Properties

65-0159 Border Business Park

85-0508 Olay Mesa Partnership

85.0578 San Diego Business Park

85.0834 San Diego Invesiments

85-0851 OIC II

8. 86-0243 Mesa Business Park

9. 86-0413 Pacific Galeway

10.86-0528 Empire Centre

12. 86-0759 Otay La Media Center

13. 86-0780 Brown Fleid Business Park

14. 86-0934 Piper Mench

15, 86-0979 La Mødia Business Park

15. 85-1006 Sen Diego Mesa

17. 86-1019 Olay Mesa Business Park, Ltd.

18. 86-1020 Olay Mesa III, LTD.

19. 88-1021 Otay Mesa International Plaza

20, 86-1022 Martinez Ranch

V MERA COMMUNITY

23. 86-1030 Jet Air

24. 86-1033 Slempre Viva Industrial

25, 87-0167 Lot 7 OIC (Revised TM)

26. 87-0305 Airway International Business Park

27. 87-0372 Lot 8 OIC (Revised TM)

28. 87-0470 CROW Olay Parcel Map

29. 87-0807 MORINAKA Parcel Map

30, 87-1005 Fong Percei Map

33. 88-1204 Pacific Business Park

34, 89-0302 Olay Corp. Center North

35, 89-0779 Olay Ranch Bus. Park

36, 89-1121 Britisnia

37, 90-0193 Caclus Road Ind.

NONTH



**OTAY MESA INDUSTRIAL DISTRICT TENTATIVE MAPS 1993** 

12-17-93

# ... Dedicated to Community Service

10995 JAMACHA BOULEWARD SPRING WALLEY, CALIFORNIA 91977 TELEPHONE 670-2222, AREA CODE 619

January 13, 1994

Mr. Gary E. Fink
COUNTY OF SAN DIEGO
Department of Planning & Land Use
5201 Ruffin Road, Suite B
San Diego, CA 92123-1295

Subject:

Draft Environmental Impact Report and Draft Specific Plan

for East Otay Mesa (GPA 94-02, Log No. 93-19-6

(W.O./F.N. 1548/3052)

Dear Mr. Fink:

The District has reviewed the draft Environmental Impact Report and draft Specific Plan for East Otay Mesa. As described in these documents, the Otay Water District will provide potable and reclaimed water services to the planning area.

To provide current information within the EIR and Specific Plan, the documents should indicate that the District has initiated the process of updating our current Water Resources Master Plan scheduled for completion in 1994. Both potable water and reclaimed water facilities will be addressed within our Otay Mesa service area which will impact those facilities within East Otay Mesa. The potable and reclaimed water facilities plans, as depicted within the draft EIR and Specific Plan, may be different from that to be produced in the updated master plan facilities. The District will incorporate the East Otay Mesa Specific Plan data/information in our water resources planning efforts.

If you have any questions regarding these comments, please contact me at 670-2242.

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Very truly yours,

James F. Peasley

Planning Manager

JFP:cp



January 14, 1994

Mr. Gary Fink
Environmental Management Specialist III
County of San Diego
Department of Planning and Land Use
5201 Ruffin Road, Suite B
San Diego, CA 92123-1666

Subject:

Draft EIR for the East Otay Mesa Specific Plan - (GPA-94-02, Log No. 93-19-6)

Dear Mr. Fink:

The City of Chula Vista has completed its review of the Draft Environmental Impact Report (EIR) for the East Otay Mesa Specific Plan (SPA). The following are our comments regarding the above referenced document:

#### CEOA Consistency - EIR

1. Although the Draft EIR does not specifically state that this is a programmatic document, numerous references are made throughout the text to future implementation measures and speculative mitigation actions to imply that this is a Program EIR. It has been our experience that for this type of document to function as a Program EIR, it must first evaluate the project as a worst case, then set standards for the mitigation of those impacts to a level below significant and identify specific mitigation measures which can be implemented to avoid those impacts, but which can only be considered at a future date.

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The EIR clearly identifies many "potential" environmental impacts which are not mitigated at this level of analysis. Therefore, the term "potential" impacts should be eliminated for reasons of clarity, and the EIR should state that there will or will not be significant impacts. Significant impacts may occur at this level of analysis in a programmatic EIR but may be reduced to insignificant in future environmental analysis be it through some subsequent EIR or subsequent initial study and negative declaration. However, at this point in analysis, it must be stated that there are significant impacts. Among these impacts is biology, which includes several sensitive habitats such as grasslands, vernal pools, and coastal sage scrub. Within these habitats, of course, are numerous species that are either listed as endangered, threatened or as a sensitive species under various systems of classification.

Also under consideration by the County in this planning process is a general plan 2. amendment (GPA), which in this case, the County is the project proponent. Based on our understanding of the Goleta ruling the County should be considering alternative sites for their proposed general plan amendment. If this were a private application for a general plan amendment on a specific parcel under the ownership and control of a single party then there would be dispute about the lack of an off-site alternative analysis. However, this is not the case. The County has other acreage throughout many square miles which this project could be located; and, therefore, they should look at alternative sites for industrial uses and screen those sites in reviewing not only the goals and objectives of their intent but also the environmental sensitivity of the various alternative sites.

#### Transportation

On page 4.7-7 it states that the draft Circulation Plan has been developed consistent with 1. the Congestion Management Program (CMP) as required by State statutes and the Regional Growth Management Program. However, an integral component to the CMP. which was not included in the discussion or identified as having been conducted or evaluated in the EIR, is the enhanced CEQA review process which is required of all "large" projects, i.e., projects generating more than 2,400 ADT or 200 or more peak hour trips. The CEQA review process requires a local jurisdiction, prior to taking action on a large project, to conduct an enhanced traffic analysis to ensure proper analysis a mitigation for project impacts to the regional circulation system, including stahighways, the regional arterial system and transit routes.

Given that the project generates over 100,000 ADT, the traffic study should be updated to include an enhanced CEQA review to evaluate the potential for regional traffic impacts. The study should show the impacts of the proposed project on the CMP system for existing and buildout conditions as it relates to existing and future growth in the South Bay region. In conducting this study, it is recommended that the "1993 Guidelines for CMP Traffic Impact Reports" be followed to promote consistency and uniformity in the preparation of CMP reports.

The draft Circulation Element of the Specific Plan does not provide an implementation 2. program (action plan) consistent with policies contained in the Circulation Element of the Ony Subregional Plan (see Circulation policies a, b and c). Specifically, the Plan's implementation "strategy" fails to provide for the establishment and coordination of circulation system financing for construction, improvement, and mitigation. Instead, the Plan lists a number of development and financing strategies and assumptions to provide the necessary service capacity and circulation links to allow development of East Otay Mesa.

At minimum, we believe the Specific Plan should implement all of the policies contained in the circulation element of the Otay Subregional Plan, and the EIR should evaluate the Public Facilities Financing Plan's (PFFP) ability to accommodate all of the regional transportation financing needs generated by the project. In addition, an evaluation of the PFFP's ability to mitigate off-site impacts of East Otay Mesa development on the existing and planned regional and subregional circulation system should be conducted.

- 3. Related to the above comment regarding the application of mitigation measures, it is also recommended that mitigation measure No. 2 on page 4.7-28 which references the requirement for project-specific traffic evaluations, be changed from "should" to "shall be required" for all major developments proposed within the East Otay Mesa Specific Plan Area, and that the traffic evaluations be conducted in a manner consistent with the October 1993 CMP Guidelines.
- The transportation analysis and circulation system evaluated in the traffic study improperly assumes completion of required on- and off-site infrastructure improvements necessary to serve the project, as well as western Otay Mesa and the Otay Ranch project. Examples of some of the development assumptions used in developing the East Otay Mesa Specific Plan include the extension and widening of SR-905, construction and operation of SR-125, the availability of future sewer capacity and/or having the financial ability to construct a reclamation plant and accommodate Phase 2 development. It is important to note that none of the improvements mentioned have identified any funding source, nor do they have commitments from private, local, state or federal interests. Another assumption implies the establishment of a Joint Power Agreement between the Cities of San Diego and Chula Vista and the County of San Diego to provide shared services and/or financing of key facilities. While this may be one of several ways in which a public agency is able to provide shared regional facilities, it is improper to base a traffic study on a phased or built out circulation system without first describing the issues of financing, timing, existing commitments, or even the process of how these decisions will be reached when entering into these agreements. The City of Chula Vista is of the opinion that without an approved Transportation Phasing Plan (TPP) that is linked to an adopted Public Facilities Financing Plan, no assurances can be made that a working, regional-serving circulation system will be in place, commensurate with need.
- 5. The Circulation Element of the East Otay Mesa Specific Plan depicts a SR 125 route alignment (S2) that is different from that shown in the Otay Ranch General Development Plan (S1), a project recently approved by the County of San Diego and City of Vista.
- 6. Page II-4. The ADT on the segment of Otay Valley Road east of I-805 should be updated to reflect the 1993 count of 19,000 ADT.
- 7. Page II-6. The City of Chula Vista uses the LOS "C" ADT only as a recommended design capacity. If the forecasted ADT is higher than the recommended LOS "C" ADT

the word <u>"over"</u> is used and further analysis of the affected segment and/or intersection is required to determine the impact of the projected traffic. For existing conditions, Chapter 11 of the 1985 Highway Capacity Manual is used.

- 8. The report should note that the segment of Otay Valley Road between I-805 and Nirvana Street is under construction as a 6-lane Major with a recommended LOS "C" ADT of 40,000. The segment of Otay Valley Road east of Nirvana Street to the city limit is under design as a 4-lane Major with an LOS "C" ADT of 30,000.
- 9. Page III-3, Figure 4. La Media Road north of Lonestar Road is shown to be carrying 57,000 ADT. This volume is over the LOS "C" ADT for a Prime Arterial. / Z Improvements should be recommended to mitigate the road deficiency.
- 10. Page III-18, Figure 6. The following corrections should be made:
  - a. The extension of Heritage road north of Otay Valley Road is a 6-lane Prime Arterial rather than a 4-lane Major Road.
  - b. The extension of Otay Valley Road east of SR 125 is a 6-lane Prime Arterial rather than a 4-lane Major Road.
  - c. The street just east of I-805 and north of Otay Valley Road (Brandywine Avenu is a Collector Street.
  - d. The South Bay model for the Otay Ranch Progress Plan highway network shows only 4 crossings of the Otay River (including SR 125) east of I-805. A discussion of the basis for adding this fifth crossing shown in this figure (Caliente Road) needs to be included in the report.
- 11. Page III-19. The Draft EIR makes numerous references as to the possibility of not providing Alta Road as a future river crossing. Some discussion of whether a traffic analysis and/or forecast has been prepared under this scenario, i.e., no Alta Rd. crossing should be provided, along with an assessment of traffic impacts on the remaining crossings and circulation systems of East Otay Mesa and Chula Vista.
- 12. Page IV-6. In the first paragraph it is indicated that the best opportunity for improving the accessibility of Otay Mesa would appear to be an extension of SR 905 freeway to Heritage Road along the expected ultimate alignment of the route. Figure D in Appendix A graphically depicts this statement showing traffic on Otay Mesa Road already exceeding the recommended LOS "C" capacity of the street. Unless a grade separation is provided at the intersection of SR 905 and Otay Mesa Road, we believe that most of the traffic added to the circulation system by upgrading SR 905 east of Heritage Rr will follow Heritage Road northerly to Otay Valley Road and Otay Valley Road to I-4

A discussion of this possibility and the likely impact on the Chula Vista circulation system should be added to the report.

#### Land Use

- 1. The Draft EIR should provide a brief discussion of all discretionary actions required to implement the project, including those not currently proposed but planned in the immediate future. It is also recommended that both documents (SPA and EIR) provide an exhibit to reflect the Amendment to the Otay Subregional Plan showing the change in location to the General Industrial (16) boundary, as proposed by the East Otay Mesa Specific Plan. The above discussion should also indicate the acreage change for all affected land use districts, and discuss the rationale for each change.
- 2. The City of Chula Vista has long been concerned over the amount and intensity of land devoted to industrial use on the Otay Mesa, both in the City of San Diego and in the unincorporated area of the County. The Land Use Element of the Specific Plan designates approximately 75 percent of its total land area (2,360 acres) to industrial land uses, which, when added to the City's industrial base, yield a total of over 6,700 acres of planned industrial for the Otay Mesa. Other land uses planned within the SPA boundaries include commercial (155 ac.) and residential lands (750 ac.); however, it is the intent of the Specific Plan to acquire or exact those areas zoned for residential uses to provide for permanent open space, and to mitigate impacts to biologically sensitive resource areas planned for industrial and commercial development.

In light of the above information, the City of Chula Vista is of the opinion that the land use section of the Draft EIR does not provide an adequate analysis of the jobs/housing imbalance caused by the project's elimination of residentially-zoned land; nor does it recognize that a <u>cumulative land use imbalance</u> already exists on the Otay Mesa. Policies that encourage increases in intensive, employment-generating land uses, without off-setting increases in residential usage, will further exacerbate the jobs/housing imbalance and impact Otay Mesa and the surrounding communities in terms of traffic, air quality and economics. As such, it is recommended that this section be expanded to include a cumulative land use impact analysis of all existing and future growth in the South Bay region.

3. Implementation of the East Otay Mesa Specific Plan will result in significant unmitigated land use compatibility impacts between residential and a number of different uses, policy inconsistencies with the Otay Subregional guidelines regarding sensitive resources, and with the goals and preliminary plans for the Otay Valley Regional Park (please refer to the complete listing of impacts on pp. ES-4 and the mitigation measures on pp. 4.1-33 through 4.1-35).

The Specific Plan attempts to address and mitigate these impacts through the application of overlay zones, zoning regulations and compliance programs, but because of inadequate or conflicting mitigation measures, the Specific Plan fails to achieve consistency with the goals set forth in the Otay Subregional Plan and the County's Regional Land Use and Conservation Elements. The EIR should address these inconsistencies and develop specific mitigation measures that mitigate them to a level less than significant. It is our opinion that the following should be accomplished:

- a) Provide a summary matrix table depicting the results of staff's consistency analysis with the goals, policies and objectives of each Planning document evaluated, i.e., the Specific Plan, Subregional Plan, Resource Conservation Plan, etc.
- b) Describe the performance standards, development criteria, etc. that might be used to strengthen the Sensitive Resource Area Regulations and/or enhance the mitigation measures to:
  - 1) guarantee the effectiveness of the design review process,
  - 2) be applicable at the time of Specific Plan adoption instead of Final Map approval, and
  - 3) provide for a comprehensive open space system utilizing consistent Plan to Plan land use designations and regulations.

The above discussion should also address the impacts <u>caused</u> by these regulatory and mitigation measures. For example, do the mitigation measures aimed at protecting the viability of planned residential indirectly preclude their development due to additional and more stringent application and permitting requirements (please refer to mitigation measures 2-7 on pp.4.1-34)?

- 4. The Draft EIR fails to address several potentially significant land use compatibility impacts of projects that are under consideration, choosing to defer their evaluation until such time as they are proposed. These projects include the County landfill, the City monofill project, and the "alternative technologies" composting project. Because of the local importance and regional significance of these projects, the EIR should identify those probable environmental effects that can be identified. In doing so, the County could ensure consideration of cumulative impacts that might be cited on a case-by-case basis, and allow itself the opportunity to consider broad policy alternatives and program-wide mitigation measures at an early time when it has the flexibility to deal with problems of cumulative impacts.
- 5. Mitigation proposed to offset impacts identified regarding Specific Plan consistencies with the Otay Valley Regional Park do not appear to be sufficient. The Otay Valley Regions' Park Policy Committee should be included in the consultation process when determining

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the appropriate land use for Johnson and O'Neil Canyons (See EIR page 4.1-35). In addition, while the Specific Plan accommodates a trail system which links to the proposed Regional Park there may be inconsistencies in providing the trail through property utilized by the Donovan Prison facility rather than incorporating the trail system into the Specific Plan through a meaningful trail design which links activity areas of the Plan (See EIR page 4.1-31).

## Biology

The DEIR states that development of the project would result in direct and cumulative impacts to sensitive vegetation and wildlife, particularly coastal sage scrub and the federally listed California gnateatcher which occupies this and other habitat. It also recognizes that prior to gaining approval of the project, the applicant will need to obtain the necessary take permits to mitigate impacts consistent with NCCP Process Guidelines. Given the importance of exchanging information about the demand, supply and biological value of mitigation lands within this subregion, and the need for establishing acceptable procedures consistent with the Endangered Species Act 4(d) special rule to coordinate subregional management and monitoring to prevent (interim) habitat losses from exceeding the 5% guideline, the City of Chula Vista recommends that the Final EIR provide a complete discussion and consistency analysis as to how the project's impact and mitigation areas relate to the recently adopted NCCP guidelines as they are currently established.

### **Noise**

1. Another area of significant impact is acoustics. There are major arterials within the project area in addition to an airport on the north side of the border and an international airport on the south side of the border. All of these impacts should be cumulatively analyzed to determine their true impacts on not only residents of the westerly areas of the Otay Mesa closer to I-805 and residents on existing and future streets in the southeasterly portion of Chula Vista but also the cumulative analysis of these acoustical impacts on sensitive biological resources within and adjacent to the proposed project.

# Public Services & Utilities - Wastewater

- 1. The wastewater peaking factor of 1.5 indicated on page 4.11-25 is incorrect based on the average daily flow of 4.44 mgd and peak flow of 8 mgd (1.8) to 11 mgd (2.48).
- 2. The report should incorporate an exhibit showing all of the trunk sewer segments to which reference is made. The prison line, OIC line, and Otay Valley Trunk are called different names by different people and use of the terms is confusing unless a "glossary" is provided.

- 3. EIR page 4.11-28: The report estimates that capacity flow will be reached in the Otay Valley Trunk Sewer by 1999. How much Chula Vista flow has been included in this assessment?
- 4. EIR page 4.11-28: The report states that the City of Chula Vista may use capacity in the Otay Valley trunk sewer "in the interim". Does this assume that Chula Vista's use of this line will be temporary? It currently appears that San Diego (assuming that San Diego's OIC line or a downstream extension of it is involved) would be more willing to sell permanent capacity rather than rent temporary capacity in this sewer line:
- 5. The EIR states that the Otay Valley Water Reclamation Plant will be operational by 1998. This schedule has been abandoned by the Clean Water Program, although the San Diego Area Wastewater Management District (SDAWMD) is reconsidering construction of this facility. Construction of this facility in conjunction with other local agencies (such as the City of Chula Vista) should be considered as an option.
- 6. Both the EIR and the Specific Plan should include coordination with the City of Chula Vista as a requirement in recommending alternatives for wastewater transmission and treatment and a regional reclaimed water system.

Thank you for the opportunity to present our comments on the Draft EIR. We would be happy to meet with you and discuss these concerns in greater detail prior to the finalization of the EIR In addition, the City of Chula Vista requests that it be consulted/contacted at an early stage in the final review period for this project, and request advance notice of future hearings of the Planning Commission and City Council.

If you have any questions or require clarification regarding our comments, please do not hesitate to contact Doug Reid, the City's Environmental Review Coordinator, at 691-5101.

Sincerely

Robert A. Leiter
Director of Planning

RAL:LF

ce: John Goss, City Manager
George Krempl, Deputy City Manager
Cliff Swanson, City Engineer
Duane Bazzel, Principal Planner

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DEPARTMENT OF BIOLOGY COLLEGE OF SCIENCES SAN DIEGO STATE UNIVERSITY SAN DIEGO CA 92182-0057

(619) 594-8767

January 14, 1994

Ms. Norma Sullivan Audubon Society San Diego Chapter 5858 Scripps San Diego, CA 92122

Dear Ms. Sullivan:

We are responding to your request to review the Otay Mesa Specific Plan DEIR in regard to sensitive plant resources in general, and vernal pools in particular. We have read the Biological Technical Report and are familiar with the area. All three of us have extensive field and/or research experience with rare plants and vernal pools.

Following are some of the differences in this DEIR from Bauder's 1986 report for the California Department of Fish and Game, as well as discrepancies between the BTR and the DEIR. Part of the problem appears to be lack of textual integration of historical sightings with the 1991 field work. In 1986, Navarretia cf. fossalis was common in one pool at J 22 and uncommon in 2 pools (cf p. 22 BTR with Bauder 1986). Dudleya variegata was also present at the site (cf Plate 2 DFIR and p. 22 BTR). To what figure does "Pool 6" refer to on Page 22 BTR, end of first paragraph? At the J 26 pools, Myosurus minimus ssp. apus was present in 1986 (cf Bauder 1986 with p. 21 BTR). Pogogyne nudiuscula is far more common at J 26 than is indicated in Plate 2.

Habitat quality is discussed primarily in terms of animals. Attention should be paid to plant habitat values, especially in regard to rare species or those species of restricted distributions. For example, 95% or more of the global distribution of Porpsync nudiuscula occurs at J 26 and immediately outside of the Specific Plan area in the J 29-30 and J 23-5 pool complexes. This plant was also known to occur on the Mexican side of the border to the east of the Tijuana airport. The area east of the border crossing and north of the border is designated as AG (agriculture, highly It should be noted whether or not this area is totally devoid of altered habitat). natural resources or restorable. In that area we have seen Spelcotyto cunicularia hypuraea (burrowing owls), Aquila chrysaetos canadensis (golden engles) and vernal pool indicator plants as well as the following sensitive species not mapped in Eryngium aristulatum var. parishii. Navarretta fossalis and Dudleya the DEIR: varienata. As noted in Table 2. DEIR, there are numerous other sensitive plant species that might occur in the area. Of especial note, and difficult to find except at certain times in favorable years, are Acanthomintha ilicifolia. Hemizonia conjurens, Myosurus minimus, Brodiaea orcuttii, Orcuttii californica, and Pozogyne nudiuscula.

We do have problems with the surveys. The known versal pool areas were surveyed (BTR, pp. 8-9) at the end of May 1991, and the previously unsurveyed areas were visited in June 1991. This is NOT the appropriate time of year for these surveys.

Identification of dried vernal pool plants is difficult even for experts in this flora. In the case of some species, virtually no remnants would be left by May or June, especially in a dry year. The maps have few (Figure 3 GTR) or no (Figure 4 GTR) identifying features. Consequently, these surveys are not sufficient to support planning decisions.

Because of our knowledge of, and interest in, rare plant species (vernal pools in particular), we would like to be put on your mailing list for review of documents that pertain to this subject. We appreciate the opportunity to provide you with information on the East Otay area, and if you need additional information or clarification, please feel free to contact us.

Sincercly.

Ellen T. Bauder, PhD

Adjunct Professor of Biology

(619) 594-5032

Scott McMillan Graduate student (619) 594-7827

Kim Marsden Graduate student (619) 594-7827

January 17, 1993

Mr. Gary Fink City of San Diego Department of Planning and Land Use 5201 Ruffin Rd. Ste B San Diego, CA 92123

RE: East Otay Mesa Specific Plan, GPA 94-02, Log #93-19-6

Dear Mr. Fink,

Pursuant to your letter of Dec. 15, 1993 I submit the following concerns about my property, parcel #646-040-07 and 08.

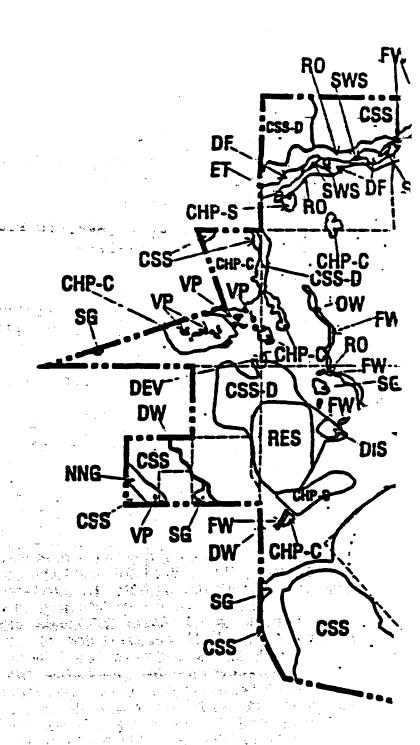
Referencing the "vernal pools" shown to exist on the property according to Ogden field map, plate #1:

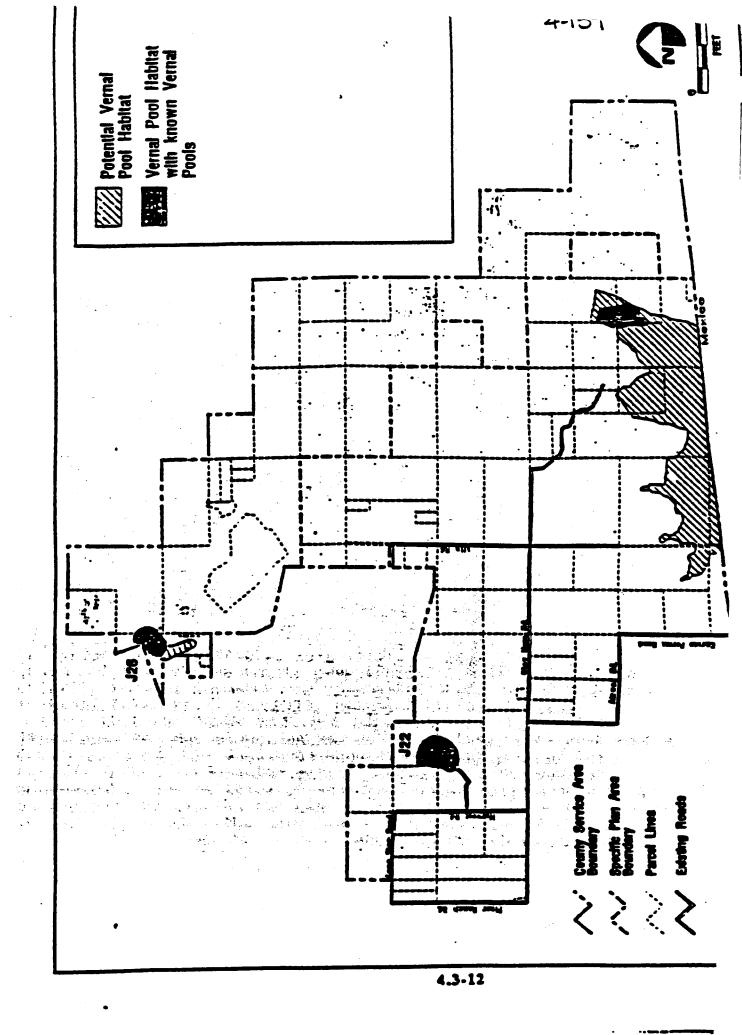
A. Page 4.3-12 of the Specific Plan Report (detailed in para. 2, page 4.3-11 indicates that there are no vernal pools either existing or potential on the property.

B. It is my contention that any areas that might be observed retaining water are in fact not vernal pools but low spots resulting from a preliminary preparation for cultivation of the property that took place prior to the June, 1991 Ogden field mapping. I am requesting the reference to vernal pools deleted in the "D.E.I.R.".

Thank you for your attention to this matter.

Melvyn Ingalls (619) 476-8292





1330 Neptune Ave. Leucadia, CA 92024 (619) 942-3437

TIJUANA, B.C. ENERO 17 DE 1994.

. COUNTY OF SAN DIEGO DEPARTAMENT OF PLANNING AND LAND USE 5201 RUFFIN ROAD, SUITE B SAN DIEGO, CA. 92123-1666

> ATT'N. MR. GARY FINK PROJECT TITLE: "EAST OTAY MESA SPECIFIC PLAN" GPA 94-02, LOG No. 93-19-6

> > 29.68 ACRES

LOS SOCIOS DE "MESA 45". SOCIEDAD PROPIETARIA DE LOS PREDIOS IDENTIFICADOS EN EL "EAST OTAY MESA SPECIFIC PLANT CON LOS NUMEROS:

36 "PARCEL NUMBER" 648-070-07 648-070-08 49 49.00 EN EL ANALISIS DE ESTE IMPORTANTE PROYECTO PARA EL CONDADO DE SAN DIEGO, NOS PERCATAMOS QUE ESTE, BASA EN GRAN MEDIDA LA SOLUCION DE SU PROBLEMATICA CONSTRUCTIVA EN EL PERJUICIO PATRIMONIAL DE "MESA 45", QUE OTRAS PERSONAS FISICAS O MORALES PROPIETARIAS DE PREDIOS DE MAYOR MAGNITUD O EN MEJOR O SEMEJANTE UBICACION, FACTIBLES DE SER UTILIZADOS PARA DAR O SEMEJANTE UBICACION, FACTIBLES DE SER UTILIZADOS PARA DAR UNA SOLUCION IGUAL O POSIBLEMENTE MAS EFICIENTE A DICHOS PROBLEMAS NO SERIAN, DE REALIZARSE ESTE AMBISIOSO PROYECTO EN LA FORMA PLANTEADA. AFECTADOS TAN SEVERAMENTE EN SU PATRIMONIO COMO LOS SOCIOS PROPIETARIOS DE "MESA 45", EN SU MAYORIA INVERSIONISTAS EXTRANJEROS O PERTENECIENTES A LAS MINORIAS ETNICAS DEL ESTADO DE CALIFORNIA. POR ELLO, RESPETUOSAMENTE NOS INCONFORMAMOS, CREEMOS QUE EL "EAST OTAY MESA SPECIFIC PLAN" ES DE VITAL IMPORTANCIA PARA SAN DIEGO, PERO NO CREEMOS JUSTO QUE UN DESARROYO DE ESTA MAGNITUD CIFRE PARTE DE SU EXITO EN LA AFECTACION DEL PATRIMONIO DE LOS MAS DEBILES ECONOMICA Y POLITICAMENTE HABLANDO, ESTAMOS CONVENCIDOS QUE EL "DEPARTAMENT OF PLANNING AND LAND USE" DEBE RECONSIDERAR EL "DEPARTAMENT OF PLANNING AND LAND USE" DEBE RECONSIDERAR EL PROYECTO EN GENERAL, PARA QUE LAS SOLUCIONES A LOS PROBLEMAS DEL MISMO SEAN RESUELTAS EN FORMA EQUITATIVA, AFECTANDO PROPORCIONALMENTE LOS PATRIMONIOS DE TODOS LOS QUE ULTIMAMENTE RESULTARAN BENEFICIADOS, Y NO AFECTANDO DESPROPORCIONADAMENTE EL PATRIMONIO DE UNO O UNOS EN PARTICULAR, CREEMOS QUE ANTE LA LEY DE LOS ESTADOS UNIDOS DE NORTE AMERICA TENEMOS DERECHOS. MISMOS QUE EN SU MOMENTO HAREMOS VALER, PARA EVITAR VERNOS AFECTADOS POR:

1330 Neptune Ave. Leucadia, CA 92024 (619) 942-3437

A.- EL ACTUAL PROYECTO DE LAS VIAS INTERNAS DE COMUNICACION (CAMINOS Y CARRETERAS, INCLUIDO EL "EMERGENCY BORDER SERVICE ROAD").

B.- EL ACTUAL PROYECTO DE LAS REDES DE DRENAJE Y BOMBEO DE AGUAS NEGRAS.

C.- LA UBICACION ACTUALMENTE PROPUESTA PARA LA PLANTA

TRATADORA DE AGUAS NEGRAS.

D.- EL ACTUAL PROYECTO DE DRENAJE PLUVIAL,

PRINCIPALMENTE LA UBICACION PROPUESTA DE LA "REGIONAL
DETENTION FACILITY".

E.- EL ACTUAL PROYECTO DE LA RED DE AGUA POTABLE, Y F.- EL ACTUAL PROYECTO DE UBICACION DEL "VERNAL POOL

HABITAT".

SIN OTRO PARTICULAR, ESPERANDO QUE LA PRESENTE LOGRE TRASMITIRLE NUESTRA GRAN PREOCUPACION POR LA REALIZACION DEL MULTICITADO PROYECTO EN LAS CONDICIONES ACTUALES DE PLANEACION Y PONIENDONOS A SUS APRECIABLES ORDENES PARA CUALQUIER AMPLIACION SOBRE ESTA QUEDAMOS DE UD.

JAVIER SANCHEZ MAYANS REPRESENTANTE COMUN

C.C.P. BRIAN P. BILBRAY, CHAIRMAN (1ST. DISTRICT)

MESA 45 1330 Neptune Ave. Leucadia, CA 92024 (619) 942-3437

TIJUANA, B.C. JANUARY 17, 1994

COUNTY OF SAN DIEGO DEPARTMENT OF PLANNING AND LAND USE 5201 RUFFIN ROAD, SUITE B SAN DIEGO, CA. 92123-1666

ATT'N. MR. GARY FINK
PROJECT TITLE:
"EAST OTAY MESA SPECIFIC PLAN"
GPA 94-02, LOG NO. 93-19-6

The associates of "MESA 45" ownership society of parcels identified in the "EAST OTAY MESA SPECIFIC PLAN" with the numbers:

36 parcel number 648-070-07 29.68 acres 49 648-070-08 49.00 = 55 = 648-080-06 3.52 =

In the analysis of this important project for the County of San Diego, we are aware that this basis in great measure the solution of its problematical constructiveness in the damage to the possessions of "MESA 45", that other persons physical or moral owners of parcels of greater magnitude or in better or similar location, feasibly of being utilized to give one solution equal or possibly more efficient at said problems, will not be achieving this ambitious project in the proposed form affected so severely in its patrimony (ownership) as the associate proprietors of "MESA 45", in its majority foreign investors or members of ethnic minorities of the State of California. For this, respectfully we disagree, we believe that the "EAST DTAY MESA SPECIFIC PLAN" is of vital importance for San Diego, but we do not believe it is just that a development of this magnitude should not count part of its success in the affectation of the patrimony of the weakest economically and politically speaking, we are convinced that the Department of Planning and Land Use should reconsider the project in general, so that the solutions to the problems of the same be resolved in an equitable form, proportionally affecting the patrimony of all those who ultimately will be benefitted, and not disproportionately affect the patrimony of one or some in particular, we believe that within the laws of The United States we have rights, these that in its moment we will make valid, so that we can avoid being affected by:

- A.- In the actual project of the internal ways of (transportation) communication (streets and roads, including the emergency service roads).
- B.- The actual project of the sewer and pumping stations networks.
- C.- The actual project proposed location of the sewage treatment plant
- D.- The actual project of storm drains, principally the location of the proposed regional detention facility.
- E .- The actual project of the potable water network, and
- F.- The actual project of the location of the Vernal Pool Habitat.

Without further specifics, hoping that the present will accomplish to transmit our great preoccupation for the realization of this multifaceted project in the actual conditions of planning and putting ourselves at your service for any amplification of this.

Attentively

Javier Sanches Mayans
Common Representative

C.C. BRIAN P. BILBRAY, CHAIRMAN (1ST. DISTRICT)

Translated by: Ernesto Alvarez
Land Use Technician II
Department of Planning and Land Use
January 26, 1994



# THE CALIFORNIA NATIVE PLANT SOCIET

JEDICATED TO THE PRESERVATION OF CALIFORNIA NATIVE

January 17, 1994

Mr. Gary Fink
County of San Diego
Department of Planning and Land Use
5201 Ruffin Road, Suite B
San Diego, California 92123-1666

Subject:

Draft Environmental Impact Report for East Otay Mesa Specific Plan (GPA

94-02; Log No. 93-19-6; State Clearinghouse No 92101099)

Dear Mr. Fink:

As part of the public review required under the California Environmental Quality Act (CEQA), the San Diego Chapter of the California Native Plant Society (CNPS) has reviewed the Draft Environmental Impact Report for the East Otay Mesa Specific Plan prepared by Ogden for the County of San Diego. We believe that the document is inadequate because it does not address the relationship of the Specific Plan Area (SPA) the Natural Community Conservation Planning Program (NCCP) or the City of San Diego Multiple Species Conservation Plan (MSCP). We are concerned about the number of sensitive species and amounts of sensitive habitat to be impacted under the East Otay Mesa Specific Plan.

The SPA proposes to impact 834.5 acres of Coastal Sage Scrub. This is completely incompatible with the City of San Diego MSCP. The SPA should reflect the findings of the MSCP and the Natural Community Conservation Planning Program (NCCP). The NCCP, although not finalized, will require preservation of the majority of the Coastal Sage Scrub being proposed for development. Impact to 38.7% of the Coastal Sage Scrub habitat in the CSA is not acceptable.

County of San Diego guidelines call for "maximum preservation of *Stipa* grassland if it is located adjacent to or in association with another type of sensitive habitat, if it contains rare plants or animal species, or if for some other reason it is important biologically". The SPA proposes to impact 27.5 acres of *Stipa* grassland that meet all of the criteria for maximum



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Department of Planning and Land Use January 17, 1994 Page 2

preservation. A state-endangered plant, Otay tarplant (Hemizonia conjugens), has been reported in these Stipa grasslands and this is an important raptor foraging area. Impacts to this habitat should be avoided.

A small amount of Southern Interior Cypress Forest is to be impacted under this SPA. We agree with the assessment that individual trees may be mitigated by replacement but that discrete stands in O'Neal Canyon and the north-south oriented drainage in the southeast corner of the SPA need to be preserved.

Mitigation for sensitive plant species lists further survey work and preservation. We support these mitigation measures. The CNPS preferred mitigation is avoidance and minimization. Salvage, transplantation, restoration and reintroduction programs are often proposed prematurely, before due diligence towards avoidance and/or minimization of impacts has been demonstrated. Salvage, transplantation, and reintroduction activities do not recreate habitat. Salvage and transplantation are not viewed as acceptable mitigation by CNPS, the California Department of Fish and Game (CDFG), or the U.S. Fish and Wildlife Service (USFWS) and are not generally successful. In reference to sensitive habitats, avoidance is preferred. In lieu of this, transplantation, restoration, and reintroduction programs should be successfully completed prior to the loss of the target taxa or habitat. This is especially pertinent to wetlands.

Project implementation would result in loss of 1.1 acres of mulefat scrub, 2.3 acres of freshwater marsh, and 1.2 acres of disturbed wetlands. USFWS and CDFG have a no net loss of wetland habitat policy. A drainage with riparian vegetation such as O'Neal Canyon which supports sensitive species and functions as an important wildlife corridor requires a 25-50 foot buffer zone and should not be proposed for development.

Preservation of 100% of the J22 complex of vernal pools is warranted and that is the preservation standard under draft MSCP guidelines. Further survey work is needed along the border to identify vernal pools since the topography indicates the presence of additional pools.

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Department of Planning and Land Use January 17, 1994 Page 3

Golden-spined cereus (Bergerocactus emoryi), Orcutt's brodiaea (Brodiaea orcuttii), San Diego marsh elder (Iva hayesiana), and Tecate cypress (Cupressus forbesii) would be affected by project implementation in O'Neal Canyon. Since O'Neal Canyon also functions as a wildlife corridor, the canyon should be preserved as open space.

Otay tarplant is a state listed endangered species of highly restricted distribution. In situ preservation is the preferred mitigation. Its level of endangerment combined with the location of the extant population within the *Stipa* grassland requires avoidance. Consultation with the CDFG under Section 2081 of the California Endangered Species Act is required by law if any direct or indirect impacts to Otay tarplant are to occur. If impacts to Otay tarplant cannot be mitigated onsite by avoidance and dedication of at least 80% of the population to long-term open space, then offsite acquisition of habitat would be necessary.

We disagree with the finding of non-significance for San Diego County needlegrass (Stipa diegoensis) impacts within the SPA. A drainage in the east-central portion of the Hillside | CRESIDENTIAL CONTROL OF CON

Table 4.3-8, Summary of Sensitive Plant Species Mitigation For the East Otay (page 4.3-90), does not list mitigation for plants that may suffer impacts that are cumulatively significant. There should be mitigation for spiny rush (Juncus acutus var. sphaerocarpus), San Diego County viguiera (Viguiera laciniata), and San Diego barrel cactus (Ferocactus viridescens). No mitigation is listed for Otay manzanita (Arctostaphylos otayensis). There are potentially indirect impacts associated with the SPA that should be identified in Table 4.3-8 (page 4.3-90).

In conclusion, we believe that the Draft Environmental Impact Report for the East Otay Mesa Specific Plan is inadequate in its proposed mitigation for direct, indirect, and cumulative impacts to sensitive biological resources. The SPA is completely incompatiwith the MSCP and NCCP. CNPS requests specific information on mitigation proposed for

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# THE CALIFORNIA NATIVE PLANT SOCIET

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Department of Planning and Land Use January 17, 1994 Page 4

impacts to sensitive species and sensitive habitat. We ask for the opportunity to review the final environmental impact report, prior to its consideration for certification and after 12 certification to ensure that our comments are adequately addressed. When this document is available, please contact me at 270-9573.

We appreciate the opportunity to review the Draft Environmental Impact Report for the East Otay Mesa Specific Plan (GPA 94-02; Log No. 93-19-6; State Clearinghouse No. 92101099).

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Sincerely,

Bertha McKinley

President

California Department of Fish and Game
U.S. Fish and Wildlife Service



#### United States Department of the Interior

#### FISH AND WILDLIFE SERVICE

ECOLOGICAL SERVICES
CARLSBAD FIELD OFFICE
2730 Loker Avenue West
Carlsbad, California 92008

January 25, 1994

Mr. Gary Fink
County of San Diego
Dept. of Planning and Land Use
5201 Ruffin Rd., Suite B
San Diego, GA 92123-1666

Dear Mr. Fink:

The U.S. Fish and Wildlife Service (Service) has reviewed the East Otsy Mesa Specific Plan and portions of the Draft Environmental Impact Report (DEIR) for the Specific Plan Area (SPA) and offers the following comments. These comments are submitted past the 17 January deadline by verbal permission given to John Lovio of my staff by you on January 14, 1994.

The SPA encompasses 3,282 acres in the western portion of the unincorporated 5,200-acre County Service Area (CSA) that occurs on flat, predominantly agricultural mesa land and rugged, undeveloped wildland at the southwestern edge of the San Ysidro Mountains in southern San Diego County. The County serves as the jurisdiction for the plan. Approximately 2,725 acres (83%) of the SPA, in 34 ownerships, are designated for a varied development plan that includes industrial and residential uses. The remaining, eastern portion is identified for low density residential and open space uses. The SPA is fully within the Multiple Species Conservation Planning (MSCP) program boundaries. The proposed State Route 125 (SR-125) extension is planned to run through the western portion of the SPA and service the Otsy border crossing. Build-out is projected to take 25 years.

Approximately 23% of the SPA supports coastal sage scrub (css), which is habitat for the federally listed threatened coastal California Gnatcatcher (Polioptile californice californice) (gnatcatcher) and is the current focus of the state Natural Communities Conservation Planning Process (NCCP). Proposed actions that adversely affect the gnatcatcher and its habitat are of concern to the Service as they fall within our mandate to enforce the Endangered Species Act of 1973 (ESA). Actions that propose to "harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect" threatened and endangered species constitute "take", which is prohibited under section 9 of the ESA.

The three avenues available in pursuing approval of projects with regard to endangered/threatened species restrictions are as follows:

1. The section 4(d) special rule associated with the threatened

Mr. Gary Fink

listing of the gnatcatcher allows for a certain level of take, which would not be a violation of section 9, provided that it is consistent with the State's NCCP Process and Conservation Guidelines. The subarea NCCP Conservation plan must meet the standard set forth at 50 CFR 17.32(b)(2). Jurisdictions utilizing this option must be enrolled in the state NCCP program. This program is intended to promote advance regional planning for development and natural reserve configurations, eliminating the need for redundant, small-scale permitting procedures within the area in question.

- 2. Section 10(a) of the ESA allows for a process to permit activities that are otherwise prohibited by section 9. Section 10(a) requires preparation of a Habitat Conservation Plan (HCP), Environmental Assessment or Environmental Impact Statement, and an Implementation Agreement.
- 3. Section 7 of the ESA requires that federal agencies shall consult with the Service on any action that may affect a federally listed species. Action means all activities authorized, funded, or carried out in whole or in part by a Federal agency.

It is the Service's understanding that the County of San Diego is currently enrolled in the NCCP. The subject project contains biological resources of regional value. It is therefore important that the final project minimize the large and small scale biological impacts to the area. Section 3a of the NCCP Conservation Guidelines (November 1993) states that "Short-term losses of habitat should be minimized so as not to foreclose future conservation planning options until such time as an NCCP has been completed and long-term enhancement and management programs are formulated." The Service strongly recommends that the County prepare and submit a subarea plan for the southern portion of the County, including the East Otsy SPA, prior to the approval and initiation of development projects. Natural preserve areas should be designated within the subarea plan.

A 280-acre portion of the cas in the SPA has been designated "low quality" and is slated for residential development. Hevertheless, this area is of sufficient integrity to support approximately 4 pairs of gnatcatchers. Mitigation for this loss has been proposed in the form of enforced low-density (maximum 1 unit/20 acres) residential development in the remaining, higher quality habitat to the east. No delineation of proposed natural open space is made in the Specific Flam, which proposes to designate open space through ad hoc planning with existing, stringent development restrictions ("G" sensitive resource designator zoning overlay) ("G" areas).

The Service acknowledges the definition of habitat quality used in section 4 of the DEIR. However, the presence of gnatcatchers implies some level of suitability for the species. The css is a dynamic system with a disturbance cycle and relatively rapid recovery capabilities. Disturbed and/or relatively open habitat also has biological buffer value. Development of the 280 acres of disturbed css would likely constitute a take of the gnatcatcher. This loss is inconsistent with the NCCP

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guidelines because it would preclude long term planning options prior to the establishment of a detailed subarea plan with clearly delineated, interconnected reserve areas.

No explicit mitigation for gnatcatcher take and css loss is discussed in the DEIR. Instead, the "G" area land-use restrictions, as opposed to previously planned higher density development, are proposed as mitigation. The Service finds that preserve construction via "G" designation gives insufficient assurance of a viable design for perpetuation of the gnatcatcher and other css species. Development of as many as 37 residences could invariably occur within "preserved areas".

The DEIR indicates approximately 43 gnatcatcher pairs within the CSA beyond the zone of disturbed css (280 acres). However, it is not clear in the document what proportion of these pairs occur within the "G" areas (i.e. within higher quality css within the SPA). Therefore, the document provides no clear quantification of the potential preservation of gnatcatchers within the low density development area. This is an especially important question considering the need to mitigate the loss of birds in the 280 acres of low quality habitat to the west.

The Service is concerned that the future viability of the J22 vernal pool complex and other isolated pools is not sufficiently provided for in the Specific Plan. The J22 complex occurs on a small remnant mesa south of Johnson Canyon, which is partially within an area designated for "hillside residential" development (Figures 4.3-1 and 4.3-5). Such integration of development and pools will exacerbate the existing degradation of the latter by altering hydrologic conditions, increasing isolation from pollinators, and facilitating invasion by non-native plants. We agree with the DEIR that impacts to vernal pools will likely be significant and unmitigable and therefore recommend specific mitigation be developed in addition to the application of the "G" area protection for vernal pools.

Other unresolved vernal pool impacts include "G" area designation of the 18 acres of vernal pool habitat on the border and the single pool to be lost south of the J22 complex. No mitigation is proposed for the latter pool.

Map figures within the DEIR (particularly Figures 3-4 and 7-1) indicate that the uncertain biological integrity of preserves within the "G" area will be further compromised by direct and indirect impacts from additional potential projects within the East Otay - Southwest San Ysidro Mountain region. These include: SR-125, alternative landfill sites, a sludge processing plant, a raceway, and an Off Highway Vehicle park. The Service finds that assurances of effective biological preservation within the SPA are not adequately provided.

In summary, the Service finds no assurance of effective biological preservation in the East Otay Mesa Specific Plan, given the lack of designated preserve areas within the SPA and the potential for significant impacts from other proposed projects within the San Ysdiro area. We commend the County on the improvements provided by the "G" area designation

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overlay compared to pre-existing zoning, but nevertheless are concerned regarding the ultimate preservation of important biological resources. This factor makes the Specific Plan inconsistent with the NCCP process.

The Service appreciates the opportunity to comment on this plan and we remain willing to assist the County in resolution of these important issues. Please direct any questions or comments to John Lovio of my staff at (619) 431-9440.

Sincerely,

flancy Hilbert

for Gail C. Kobetich

Field Supervisor

#1-6-94-HC-70

cc: CDFG, San Diego, GA (Attn: B. Tippets)

## STATEMENT OF OVERRIDING CONSIDERATIONS EAST OTAY MESA SPECIFIC PLAN

The Board of Supervisors has reviewed the enclosed draft and final EIR for the East Otay Mesa Specific Plan, GPA 94-02, Log No. 93-19-6. Based on that review, public and agency comments received, and staff analysis, the Board of Supervisors finds that:

- 1. The final EIR for the East Otay Mesa Specific Plan has been completed in compliance with the CEQA and that the Board of Supervisors, in exercise of its independent judgment, has reviewed the information contained therein prior to approving the project.
- 2. Find pursuant to Section 15091 of the State CEQA Guidelines and Sections 21002 and 21002.1 of the Public Resources Code as follows:
  - a. With the exceptions of biological resources and noise, all significant effects identified in the EIR have been avoided or substantially lessened by mitigation measures which have been made conditions of project approval, as set forth in detail in the Final Environmental Impact Report Discussion, dated February 17, 1994, prepared for this project.
  - b. Changes or alterations have been incorporated into the project which mitigate or substantially lessen the significant impacts of the project. Potential adverse impacts to the issues of land use, landform alteration, cultural resources, geology and soils, hydrology and water quality, transportation and circulation, air quality, health and safety, public services and utilities (schools, water, wastewater, and solid waste), population, housing, and employment are reduced by conditions imposed on the General Plan Amendment/Specific Plan, or will be mitigated through subsequent review required as a part of the discretionary review process.
- 3. Issues identified as not significant include the following: fire protection and emergency services; police protection; parks and recreation; library facilities; and gas and electricity.
- 4. There is no feasible way to lessen or avoid the significant biological and noise impacts for the following reasons:

The findings of fact to support these conclusions are:

a. <u>Biological Resources</u> - The present project involves the adoption of a General Plan Amendment and a Specific Plan for future development of

East Otay Mesa. No development projects are proposed at the present time. However, future implementing permits could result in impacts to sensitive habitats and sensitive species that are within the East Otay Mesa Specific Plan Area.

Actions taken as part of the Specific Plan process to protect sensitive habitat and species include the identification of steep slopes and biologically sensitive areas that are intended to be protected and conserved. These areas are identified in the Conservation Plan, Figure 2-8 in the Specific Plan text. The areas include the eastern hillside area with steep slopes and biologically sensitive areas; Johnson Canyon, which has steep slopes; and an area west of Johnson Canyon that contains Coastal sage scrub and vernal pool habitat.

The areas to be conserved are zoned Rural Residential, a very low density land use (1 dwelling unit per 20 acres). Areas that have steep slopes and are biologically sensitive have been given a "G" Designator and are subject to the Sensitive Resource Area Regulations of The Zoning Ordinance. Approval of resource conservation plans by the County are required prior to development of "G" Designator areas. Applicants are required to submit a Site Plan for review prior to development of these areas.

There are known biologically sensitive areas that have not been given the "G" Designation. These are areas that have been targeted for mixed industrial or commercial uses. This includes two small vernal pools south of Lone Star Road, the potential vernal pool area near the border, and the native grassland area near the border. Some Coastal sage scrub near the rural residential use areas could also be impacted, as could territories of the California gnatcatcher. Impacts to biological resources in these areas will be mitigated on a case-by-case basis when discretionary permit applications are reviewed in the future. However, biological impacts in these areas may not be able to be sufficiently mitigated; therefore, the issue of impacts to biological resources has been addressed as significant and not mitigable.

b. Noise - Future traffic noise may impact noise sensitive receptors adjacent to certain roadway segments, including impacts to six existing residences, impacts to potential new residences, and impacts to the habitat of the California gnatcatcher. It may not be possible to feasibly mitigate noise levels for noise sensitive receptors along some roadways and within California gnatcatcher habitat.

Noise sensitive land uses within the 60 CNEL noise contour shall have site specific noise studies prepared, with mitigation measures such as noise

barriers, setbacks, and interior mitigation. Site specific noise studies and mitigation will be required when roadways are adjacent to existing residential uses. However, impacts to residential uses and to the California gnatcatcher may remain significant and not mitigable after completion of the site specific noise studies.

5. Find further that, pursuant to Section 15093 of the State CEQA Guidelines, specifically identified expected benefits of the project outweigh the unavoidable adverse environmental impacts of the project for the following reasons:

Implementation of this project will provide substantial public benefits to the community that would otherwise not occur. These benefits include the creation of 32,890,239 square feet of industrial development; 1,129,337 square feet of regional commercial development; and 212,486 square feet of district commercial development. These land uses will generate new employment for approximately 21,264 employees and also for construction related employment during the construction phase of this new development.

The project would contribute significantly to the tax base of San Diego County through the generation of an estimated \$54,111,000 in tax revenues upon full buildout. This includes \$24,981,000 in property tax revenue, \$10,600,000 in sales tax revenues for the County General Fund, and an additional \$18,530,000 to be divided among special programs of the County (Criminal Justice Program, Transnet, Health and Social Services, and County Transportation Fund) after buildout.

Other potential benefits of the project include construction and maintenance of a planned storm water and drainage system; construction and maintenance of several Circulation Element roads; provision of a fire station in an area where none is presently available; provision of other infrastructure and public facility improvements in a planned and orderly manner; and protection of environmentally sensitive lands, such as steep slopes, vernal pools, Coastal sage scrub vegetation, native grasslands, territories of the California gnatcatcher, and other sensitive habitats and species.

The project will significantly contribute to an improvement in the jobs/housing balance in MSA 2, the Major Statistical Area of the County in which the project is located. If all projects in the MSA are built as planned, the jobs/housing ratio will increase from .86 in 1990 to 1.38 at buildout (meaning from .86 job per housing unit to 1.38 jobs per housing unit).

The project will encourage the location or expansion of manufacturing employment in the industrially zoned portions. Manufacturing jobs yield the

highest average annual salaries of all employment sectors, and thus, contribute significantly to the region's overall standard of living, as measured by per capita income.

The project will improve the region's opportunities for international trade under the North American Free Trade Agreement (NAFTA) because of its proximity to the Mexican border, and due to contributions to an expanded road system in the County.

In addition, the East Otay Mesa Specific Plan will create increased demand for light rail and freight rail transit systems, and will provide multiple opportunities for extending a rail system by utilizing potential right-of-way reserved in the form of existing front setback requirements along east-west roads in the Specific Plan Area. A Metropolitan Transit Development Board (MTDB) light rail corridor is shown on the Circulation Plan (Figure 2-12 in the Specific Plan text) to encourage the use of light rail systems. The predominance of industrial uses proposed for the plan provide added demand to enhance the feasibility of a freight rail system, which will provide public benefit by reducing roadway congestion.

Additional evidence supporting these findings is contained in A7, 7A.

EIRS\EASTOTAY.EIR;dld/tf

## EAST OTAY MESA SPECIFIC PLAN MITIGATION MONITORING PROGRAM

Public Resources Code Section 21081.6 (Assembly Bill 3180, Chapter 1232, Statutes of 1988) responds to a long standing need to ensure that mitigation identified in environmental review documents which have been prepared in accord with the CEQA is implemented after a project is approved. As such, a Mitigation Monitoring Program is intended to provide a viable nexus between the adoption of mitigation measures and their actual implementation. Further, both monitoring and reporting activities provide a vehicle to verify the success of the mitigation measures in reducing identified potentially significant impacts to below a level of significance.

Mitigation measures which would reduce or eliminate potential adverse environmental impacts of the proposed East Otay Mesa Specific Plan (GPA 94-02, Log No. 93-19-6) have been identified throughout the EIR for the project. Pursuant to Assembly Bill 3180, the project proponent is required to implement the adopted mitigation measures identified in the EIR. In order to ensure compliance with the adopted mitigation measures, the following Mitigation Monitoring Program has been formulated. This program consists of a checklist including a detailed description of the adopted mitigation measures, mitigation type, and compliance criteria for the project.

This Mitigation Monitoring Program is intended to be administered by the County Department of Planning and Land Use. It is further intended that funds for administering the Mitigation Monitoring Program be provided on a full cost recovery basis by the permittee or successor-in-interest to the applicable Tentative Map(s) or implementing permit. If necessary, Certificates of Compliance by other agencies, such as CalTrans, County Department of Public Works, or County Air Pollution Control District, shall be secured by the permittee and presented to the Code Enforcement Division. No authorization to commence any activity on-site shall be granted except with the concurrence of Code Enforcement.

The checklist is intended to be used by the Department of Planning and Land Use as the appointed monitoring entity. Information contained within the checklist summarizes the mitigation measure contained in detail in the final EIR, delineates the monitoring schedule, and defines the conditions required to verify compliance. The following is an explanation of the checklist components:

Column 1

<u>Mitigation Measure</u>: An inventory of each mitigation measure is provided with a brief description. Note that the full text of the mitigation measure is contained in the East Otay Mesa final EIR which should be consulted for more detail.

- <u>Column 2</u> <u>Type</u>: Each mitigation measure is classified as either Project Design Mitigation (PD), On-Going Mitigation (OM), or Cumulative Mitigation (CM) based upon the following definitions:
  - Project Design Mitigation Mitigation which has been incorporated into the project design (e.g., acoustical barriers, road improvements).
  - On-Going Mitigation Mitigation associated with a project over a period of time (e.g., dust control, landscape maintenance).
  - Cumulative Mitigation Mitigation which requires monitoring over a greater period of time (e.g., cultural resources monitoring).
- Schedule: As scheduling is dependent upon the progression of the overall project; specific dates are not used within the "Schedule" column. Instead, scheduling describes a logical succession of events (e.g., prior to occupancy, annually, etc.).
- <u>Monitor</u>: Identifies the agency or department which is responsible to determine compliance with the mitigation measure and to inform the Department of Planning and Land Use regarding compliance.
- Compliance Criteria: The monitor can easily determine compliance with a given mitigation measure by referring to "Compliance Criteria". Upon satisfaction of the requirement listed in this column, the mitigation measure is considered to be complete.
- Verification of Compliance: The monitor verifies completion of the particular mitigation measure by initialing and dating in this column. Where the "Schedule" column indicates annual or other on-going mitigation measures, verification of compliance may not occur until completion of the project. If on-going cumulative mitigation is required, remarks shall be entered regarding the status of the mitigation during each visit.

# EAST OTAY MESA SPECIFIC PLAN MITIGATION MONITORING CHECKLIST

	<del> </del>	<del></del>	<u> </u>		
MITIGATION NEASURE	TYPE	MONITOR	SCHEDULE	COMPLIANCE CRITERIA	COMPLIANCE VERIFICATION (INITIALS/DATE/REMARKS)
LAND USE			•		
Site Plan requirements include provision of landscaped buffers between residential and non-residential uses, adherence to noise mitigation (refer to Noise section of this checklist or Section 4.8 of the DEIR), preparation of Site Plans with detailed mitigation prior to approval of residential units, placement of homes away from light sources. (Page A-5 & A-21, FEIR)	PO/OH	County OPLU	Prior to approval of discretionary permits (Tentative Haps, Tentative Parcel Haps, Hajor Use Permits, Site Plans, Administrative Permits, etc.),	To satisfaction of County DPLU/Noise Control Officer.	
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 required for any development within 60 feet of border. (Page A-5, FEIR)	PO	County DPLU	Prior to approval of discretionary permits (Tentative Maps, Tentative Parcel Maps, Major Use Permits, Site Plans, Administrative Permits, etc.).	Approval by County DPLU.	
BIOLOGY					
Retain 100 percent of J-22 complex (including watershed); provide buffers. Conduct surveys in potential vernal pool habitat and preserve 100 percent of pools that support sensitive species. If not possible, prepare resource conservation plan for on- or off-site mitigation. (Page A-12 & A-13, FEIR)	P9/0H	County DPLU	Prior to approval of discretionery permits on percel that contains vernel pools.	Approval by County DPLU.	-
Avoidance of sensitive plants and preservation of habitat in which the plant species occurs. (Page A-13 & A-14, FEIR)	PD/CH	County DPLU	Prior to approval of discretionary permits for percel that contains sensitive plants.	Approval by qualified biologist/County DPLU.	
Avoidance of impacts to species by preservation of habitat including vernal pools, acquisition of raptor habitat through implementation of regional habitat management program. (Page A-13 & A-14, FEIR)	PD/OH	County DPLU	Prior to approval of discretionary permits for percel that contains sensitive species.	Approval by qualified biologist/County DPLU.	
Participation in NCCP and consistency with regional planning efforts which will require that large portions of Coastal sage scrub habitat be preserved on-site in designated open space. (Page A-11 & A-12, FEIR)	PD/ON	County OPLU	Prior to approval of discretionary permits in areas that contain Coastal sage scrub.	Approval by County DPLU.	

MITIGATION NEASURE	TYPE	MONITOR	SCHEDULE	COMPLIANCE CRITERIA	COMPLIANCE /ICATION (INITIALS/DATE/REMARKS)
Incorporate 90 percent of Stips on-site into designated open space, and maintain corridor between preserved grassland habitat and open space in foothills to east. Retain some non-native grassland along U.S./Mexico border as foraging habitat. If not possible, prepare resource conservation plan. (Page A-12, FEIR)	PD/OH	County DPLU	Prior to approval of discretionary permits near border that contain native grassland.	Approvel by qualified biologist/County OPLU.	
Preserve open space in drainages that support discrete stands of Southern interior cypress forest. (Page A-14, FEIR)	PD/OH	County DPLU	Prior to approval of discretionary permits (Tentative Haps, Tentative Parcel Haps, Hajor Use Permits, Site Plane, Administrative Permits, etc.) in this area.	Approval by qualified biologist/County DPLU.	
Preserve drainages and incorporate buffers for 13 acres of wetlands. (Page A-14, FEIR)	PD/OH	County BPLU	Prior to approval of discretionary permits (Tentative Mape, Tentative Parcel Mape, Major Use Permits, Site Plane, Administrative Permits, etc.) in this area.	Approval by qualified biologist/County DPLU.	
Preserve rock outcrops in D'Nemi Canyon. (Page A-14, FEIR)	P0/0H	County DPLU	Prior to approval of discretionary permits (Tentative Maps, Tentative Parcel Maps, Major Use Permits, Site Plans, Administrative Permits, etc.) in this area.	Approval by County DPLU.	·
Preserve connective wildlife corridors in designated open space. Remove proposed Alta Road crossing over O'Meal Canyon or construct bridge such that animals can pass underneath. (Page A-14, FEIR)	PD/OH	County BPLU	Prior to approval of discretionary permits (Tentative Maps, Tentative Percel Maps, Major Use Permits, Site Plans, Administrative Permits, etc.) in the O'Heat Camyon area or Alta Road plans.	Approval by qualified biologist and/or County DPLU.	

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MITIGATION NEASURE	TYPE	MONSTOR	SCHEDULE	COMPLIANCE CRITERIA	COMPLIANCE (CATION (INITIALS/DATE/REMARKS)
Mitigation for impacts to several sensitive species listed in Table 4.3-9 in the EIR varies but includes habitat preservation of wetlands, drainages, and Coestal sage scrub, and maintenance of wildlife corridor in O'Heal Canyon. (Page A-10 through A-15, FEIR)	PD/ON	County DPLU	Prior to approval of discretionary permits (Tentative Maps, Tentative Parcel Maps, Major Use Permits, Site Plans, Administrative Permits, etc.).	Approval by qualified biologist and/or County DPLU.	
Mitigation measures for indirect impacts to habitat for animal species includes several mitigation measures such as: prepare fire management and emergency access plan; incorporate appropriate features to ensure no increase in runoff from pre-development condition; limit construction activities adjacent to drainages; and employ standard erosion control techniques. (Page A-14 & A-15, FEIR)	PD/GN	County BPLU	Prior to approval of discretionary permits (Tentative Hape, Tentative Parcel Hape, Hajor Use Permits, Site Plans, Administrative Permite, etc.).	Approval by qualified biologist and/or County DPLU.	
NOISE					
Noise sensitive land uses located within the 60 CHEL noise contour shall have a site specific noise study prepared with mitigation measures such as noise barriers, setbacks, and interior mitigation. (Page A-21, FEIR)	PD/GH	County DPLU	Prior to approval of discretionary permits. Site specific noise study and mitigation required when roadways adjacent to existing off-site residences are realigned and upgraded.	Approval by County Hoise Officer.	
Residential development in hillside residential district shall be avoided within 60 CMEL noise contours unless exterior and interior levels can be mitigated. (Page A-21, FEIR)		County DPLU	Prior to approval of discretionery permits (Tentative Mape, Tentative Parcel Mape, Najor Use Permits, Site Plans, Administrative Permits, etc.) in this area.	Approval by County Noise Officer.	
Siting of noise generating industrial and commercial land uses in vicinity of existing or proposed noise sensitive land uses shall be such that moderate to high noise producing operations are located further from noise sensitive receptors. Site specific studies will be required that demonstrate that proposed facilities would be operated in compliance with County Noise Ordinance. (Page A-21, FEIR)	PO/GM	County DPLU	Prior to approval of discretionary permits (Tentative Mape, Tentative Parcel Mape, Major Use Permits, Site Plans, Administrative Permits, etc.).	To satisfaction of County DPLV and County Noise Officer.	

		<u> </u>			
MITIGATION MEASURE	TYPE	MONITOR	SCHEDULE	COMPLIANCE CRITERIA	COMPLIANCE CATION (INITIALS/DATE/REPARCS)
Site specific noise studies for noise from interim land uses shall be required that demonstrate that appropriate noise mitigation measures are included in the design of residential projects. All construction operations shall comply with the County Construction Noise Ordinance. All construction within 1,500 feet of gnatcatcher habitat shall require project specific noise mitigation and monitoring plan. (Page A-21, FEIR)	PD/OH	County DPLU	Prior to approval of discretionary permits (Tentative Maps, Tentative Parcel Maps, Major Use Permits, Site Plans, Administrative Permits, etc.).	Approval by County Hoise Officer.	
LANDFORM ALTERATION/VISUAL QUALITY					
Site specific grading plans shall be prepared with measures to reduce the amount of landform alteration in hillside residential districts in areas that contain steep slopes. No fill shall be permitted in Johnson Canyon within the hillside residential district. (Page A-5, A-6, A-7, FEIR)	PD	County DPLU	Prior to approval of discretionary permits (Tentative Haps, Tentative Parcel Haps, Hejor Use Permits, Site Plans, Administrative Permits, etc.) and grading plans.	Approval by County DPLU.	
CULTURAL RESOURCES					
All untested or unevaluated sites must be tested to determine site importance. Field surveys are required for unsurveyed areas. Sites determined significant must be placed in dedicated open space easements. Implementation of cultural resources management plan. (Page A-15 & A-16, FEIR)	PO	County DPLU	Prior to approval of discretionary permits (Tentative Hape, Tentative Parcel Hape, Hajor Use Permits, Site Plans, Administrative Permits, etc.).	Approval by County DPLU.	•
GEOLOGY/SOILS					
Site specific subsurface geotechnical investigations shall be prepared at the Tentative Map level; mitigation measures shall be incorporated into construction plans. (Page A-17, FEIR)	<b>PO</b>	County DPLU	Prior to approval of discretionary permits (Tentative Maps, Tentative Parcel Maps, Major Use Permits, Site Plans, Administrative Permits, etc.).	Approval by County DPW.	
Design and construct project in accordance with Uniform Building Code seismic design parameters. (Page A-17, FEIR)	PD	County DPLU	Prior to approval of discretionary permits (Tentative Maps, Tentative Percel Maps, Major Use Permits, Site Plans, Administrative Permits, etc.).	Approval by County DPW.	

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NITIGATION MEASURE	TYPE	MONETOR	SCHEDULE	COMPLIANCE CRITERIA	COMPLIANCE (CATION (INITIALS/DATE/REMARKS)
Incorporate remedial grading and design techniques into design including removal and replacement of liquefiable soils or construction of deep foundation systems. (Page A-17, FEIR)	PD	County DPLU	Prior to approval of discretionary permits (Tentative Maps, Tentative Parcel Maps, Major Use Permits, Site Plans, Administrative Permits, etc.) and grading plans,	Approval by County DPW.	·
Remove reservoirs or prepare flood control plans for areas adjacent to or downstream from reservoirs. (Page A-17, FEIR)	PD	County DPLU	Prior to approval of discretionary permits (Tentative Maps, Tentative Parcel Maps, Major Use Permits, Site Plans, Administrative Permits, etc.).	Approval by County DPW.	
Perform static and pseudo-static slope stability analyses for proposed cut and fill slopes; slopes should be flattened to reduce slope inclinations or earthfill buttresses constructed. (Page A-17, FEIR)	<b>90</b>	Count DPLU	Prior to approval of discretionary permits (Tentative Haps, Tentative Parcel Haps, Hajor Use Permits, Site Plans, Administrative Permits, etc.).	Approval by County DPW.	
Use engineering techniques to reduce the soils related hazards as outlined in Section 4.5 of the DEIR. (Page A-17, FEIR)	<b>P0</b>	County BPLU	Prior to approval of discretionary permits (Tentative Maps, Tentative Percel Maps, Major Use Permits, Site Plans, Administrative Permits, etc.).	Approval by County DPV.	
NYDROLOGY/MATER GUALITY				•	
Provisions shall be made as individual projects are proposed to construct on-site detention facilities, storm drain facilities, energy dissipaters, and erosion control to ensure that runoff exiting developed areas does not cause downstream impacts to the Otay River watershed as required in the Specific Plan Flood Control Haster Plan. (Page A-18, FEIR)	PB/GM	County DPLU	Prior to approval of discretionary permits (Tentative Haps, Tentative Parcel Haps, Hejor Use Permits, Site Plans, Administrative Permits, etc.) and grading plans or detailed Site Plans.	Approval by County DPW.	

		_			
MITIGATION NEASURE	TYPE	MONITOR	SCHEDULE	COMPLIANCE CRITERIA	COMPLIANCE/ICATION (INITIALS/DATE/REMARKS)
Construction techniques that prevent erosion and off-site transport of sediment shall be incorporated into construction plans for individual projects. (Page A-18, FEIR)	PO/ON	County BPLU	Prior to approval of discretionary permits (Tentative Maps, Tentative Percel Haps, Major Use Permits, Site Plans, Administrative Permits, etc.) and grading plans.	Approval by County DPW.	·
TRANSPORTATION/CIRCULATION					
Monitor traffic growth and trip generation, and effects on roads as outlined in Policy C-16 of the East Otay Mesa Specific Plan. (Page A-19, FEIR)	OH/CH	County DPLU	Throughout life of the project.	Approval by County DPLU to maintain LOS "C".	
The County shall work with the Cities of San Diego and Chula Vista to resolve inconsistencies and coordinate roadway design and implementation at jurisdictional boundaries. Project specific traffic analyses should be required for all major developments proposed within the Specific Plan Area exceeding 100 trips per acre. (Page A-19, FEIR)	PD/QN/CN	County DPLU	Prior to approval of discretionary permits (Tentative Haps, Tentative Percel Haps, Hejor Use Permits, Site Pians, Administrative Permits, etc.) and throughout the life of the project.	Approval by County DPLU.	
AIR QUALITY					
Developers shall use combination of several techniques to reduce construction emissions as outlined in Section 4.9 of the EIR. (Page A-22, FEIR)	PD/CH	County DPLU	Prior to approval of discretionary permits (Tentative Haps, Tentative Percel Haps, Hajor Use Permits, Site Plans, Administrative Permits, etc.).	Approval by County DPLU.	· .
Development projects shall incorporate several techniques and design features into projects to reduce vehicle emissions as required in the Regional Air Quality Strategy and outlined in Section 4.9 of the DEIR. (Page A-22, FEIR)	PD/04/CH	County DPLU	Prior to approval of discretionary permits (Tentative Haps, Tentative Parcel Haps, Hajor Use Permits, Site Plans, Administrative Permits, etc.) and throughout the life of the project.	Approval by County DPLU.	

MITIGATION NEASURE	TYPE	MONITOR	SCHEDULE	COMPLIANCE CRITERIA	COMPLIANCE TO CATION (INITIALS/DATE/REMARKS)		
NEALTH AND SAFETY					•		
Hezerdous Meterials and Menagement Plans shall be prepared to ensure that no risks will occur regarding use and transport of hezerdous materials within the industrial district. Transport shall be conducted in accordance to California Code of Regulations and Code of Federal Regulations. (Page A-23, FEIR)	PD	County OPLU	Prior to approval of discretionary permits (Tentative Haps, Tentative Parcel Haps, Hajor Use Permits, Site Plans, Administrative Permits, etc.).	Approval by County Hezardous Materials Management Section, Environmental Health Division.			
PUBLIC SERVICES AND UTILITIES							
SCHOOLS							
Any residential development proposed shall obtain school letters in conformance with County and State requirements. (Page A-24, FEIR)	PD	County DPLU	Prior to approval of discretionary permits and building permits.	Letter from applicable school district.			
WATER							
On-site domestic water demand to be reduced through Best Henagement Practices water conservation measures. Water conservation plan shall be prepared. (Page A-25, FEIR)	PO	County DPLU	Prior to approval of building permits.	Approval by County DPLU.			
MASTEMATER							
No development of the Specific Plan Area shall be allowed beyond that which can be served by the initial 1.8 million gallons per day capacity until long-term sewer service capacity is available. (Page A-26, FEIR)	PO/CH	County DPLU	Condition approval of discretionary permits (Tentative Haps, Tentative Parcel Haps, Hajor Use Permits, Site Plans, Administrative Permits, etc.).	Approval by County BPLU.			

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LAUREN M. WASSERMAN DIRECTOR (618) 884-2862

# County of San Miego

DEPARTMENT OF PLANNING AND LAND USE

FIELD OFFICE 334 VIA VERA CRUZ SUITE 150 SAN MARCOS CALIFORNIA 92069-2638 (819) 891-9092

MAIN OFFICE \$201 RUFFIN ROAD, SUITE B, SAN DIEGO, CALIFORNIA 92123-1666 INFORMATION (\$19) 694-2960

November 16, 1993

TO:

Distribution List

FROM:

County of San Diego

Department of Planning and Land Use

5201 Ruffin Road, Suite B San Diego, California 92123

NOTICE OF COMPLETION OF A DRAFT ENVIRONMENTAL IMPACT REPORT, DRAFT SPECIFIC PLAN, AND RELATED GENERAL PLAN AMENDMENT (GPA 94-02), AND ZONE RECLASSIFICATION (R93-008), LOG NO. 93-19-6

Attached please find draft EIR, Specific Plan and related documents regarding the East Otay Mesa Area. We are requesting your comments.

The County of San Diego is the Lead Agency for this project. We need to know the views of your agency about the content of the environmental information which is germane to your agency's statutory responsibilities in connection with the proposed project. Your agency will need to use the Environmental Impact Report prepared by our agency when considering permits or other types of project approval under your responsibility. Please include a recommendation for mitigation measures which your agency believes should be conditions of project approval.

The project description, location and the probable environmental effects are contained in the attached materials.

The proposed General Plan Amendment (GPA 94-02) involves changes necessary to establish consistency with the proposed East Otay Mesa Specific Plan. These involve:

- 1. Amend the Regional Land Use Map and text to change the regional land use designation from Special Study Area (SSA) to Current Urban Development Area (CUDA).
- 2. Amend the Otay Subregional Plan Map and text to reflect the decrease in Industrial (16) designated land and an increase in Rural Residential and 145 acres of Commercial land use. Delete or revise the Specific Plan Guidelines contained in the Otay Subregional Plan to correlate with the East Otay Mesa Specific Plan. An example to be deleted is the need to provide for adequate library facilities to serve the East Otay Mesa area.

Very little residential land use is anticipated for this area and this provision is unnecessary. Similar provisions are also proposed to be deleted or amended.

3. Amend Sheets 6 and 9 of the Circulation Element Maps to reflect the proposed circulation system.

In addition, a zone change (R93-008) is proposed to rezone certain properties to the "B", Community Design Review and "G", Sensitive Habitat Special Area Designators.

The deadline for comments has been extended to January 2, 1994, due to delay in mailing the documents.

PLEASE SEND YOUR RESPONSE TO GARY FINK (619) 694-3016 AT THE ADDRESS SHOWN ABOVE. MARK CARROLL, (619) 694-2976, WILL RESPOND TO QUESTIONS REGARDING THE SPECIFIC PLAN. WE WILL NEED THE NAME OF A CONTACT PERSON IN YOUR AGENCY. WE WILL NEED YOUR COMMENTS NO LATER THAN JANUARY 2, 1994. PLEASE REFERENCE THE PROJECT NUMBER WITH YOUR COMMENTS.

PROJECT TITLE: EAST OTAY MESA SPECIFIC PLAN, GPA 94-02, LOG NO. 93-19-6

PROJECT APPLICANT: County of San Diego, Department of Planning and Land Use

SIGNATURE:

TITLE: ENV Mant Sp. III

AUTHOR\11-93\FSNOCGF.113;jcr

INDLINE OF		ieriou		App	endix F	ĺ	See NOTE below
Mail to: State Clea	ringhouse	, 1400 Tenth Street, Sac	ramento, CA	95814 916/	445-0613	SCH#	92101099
Project Title: _	East	Otav Mesa Speci	fic Plan			<u> </u>	
		San Diego Dept		& Land U	SEContact Perso	n: Gar	y Fink
Street Address: 52	01 Ruff	in Road, Suite B				619) 694	i−3016
Sa Sa	n Diego	, CA	Zip: 921	23		an Diego	)
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Project Locatio	on .						
County:Sa	n Diego		City/Neares	Community:	Chula Vi	sta & Ci	ty of San Diego
		Road & Hwy. 805	· .			Total	Acres: 3,300
Assessor's Parcel No		•	Section:	N/A	Two, N/A		e: N/A Base: N/
Virbin 2 Milee	State Harv ±	<u>805 &amp; 905</u>	Waterways:				
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Community Plan	ì	Site Plan	-		Division (Subdi		Other
				Parc	el Map, Tract M	iap, etc.)	
Development T	Type						
	rits	Acres 753		<b>─</b> 7	Water Facilities:	Tune	MGD
		Acres - Employ	eet	_	Transportation:	TypeType	
Commercial: Sq		Acres 154 Employ			Vining:	Mineral	
		Acres 2360 Employ			Power.	Type	Watts
Educational _					Waste Treatment		
Recreational					Hazardous Wast		
					Other: Publ	ic Facil	ities 33 acres
Project Issues	Discuss	ed in Document		•			· ·
Aesthetic/Visual		Flood Plain/Floodin	ng l	X Schools/Uni	versities	1	Water Quality
🔀 Agricultural Lan		Forest Land/Fire H		Septic Syste			Water Supply/Grounds
Air Quality		☑ Geologic/Seizmic	Ì	Sewer Cape			Wetland/Riperian
Archeological/H	istorical	Minerals			/Compaction/Gr	ading -	Wildlife
Coastal Zone	•••	Noise		Solid Waste			Growth Inducing
Drainage/Absorp	ption	Population/Housing		Toxic/Haza		<del>-</del>	Landmae-
Economic/Jobs		Public Services/Fax	· ·	Traffic/Circ	nlation .		Cumulative Effects
Fiscal _	··· -	Recrestion/Parks		Vegetation	Ξ		
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<b>Present Land I</b> zone. Most o	<b>Use/Zoni</b> of the a	ng/General Plan Us area is vacant on	<ul><li>Preser</li><li>light in</li></ul>	ntly design dustrial	naved Spec uses .	ific-Pl	an Area-with and
Project Descr							
iuture develo	opment c	of 3,300 acres wi	ithin a 20	) year tim	ne frame to	allow:	tor the followin

uses: 2,359.55 acres of Mixed Industrial; 154.02 acres of Commercial (124.63 of Regional and 24.39 acres of District Commercial); 1.79 acres for a fire/sheriff station; 4.94 acres for a trolley station; 26.44 acres for State Route 125 right-of-way; 753.4 acres of Hillsi Residential.

lewing Agencies Checklist	KEY				
Resources Agency	S = Document sent by lead agency				
Boating & Waterways	X = Document sent by SCH				
Coastal Commission	✓ = Suggested distribution				
_Coastal Conservancy					
_Colorado River Board					
<del>-</del>	Environmental Affairs				
_Conservation	Air Resources Board				
_Fish & Game	X_APCD/AQMD				
_Forestry	California Waste Management Board				
_Office of Historic Preservation	X_SWRCB: Clean Water Grants				
_Parks & Recreation	SWRCB: Delta Unit				
_Reclamation	SWRCB: Water Quality				
_S.F. Bay Conservation & Development Commission	SWRCB: Water Rights				
_Water Resources (DWR)	X Regional WQCB # ()				
Business, Transportation & Housing	Youth & Adult Corrections				
_Aeronautics	Corrections				
_California Highway Parrol					
_CALTRANS District #11	Independent Commissions & Offices				
Department of Transportation Planning (headquarters)	Energy Commission				
_Housing & Community Development	X_Native American Heritage Commission				
_Food & Agriculture	Public Utilities Commission				
_	Santa Monica Mountains Conservancy				
Health & Welfare	State Lands Commission				
_Health Services	Tahoe Regional Planning Agency				
State & Consumer Services					
_General Services	Other				
_OLA (Schools)	en e				
•					
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ing Date11-16-93	Ending Date 12-30-93				
	•.				
ature Guy P. Fish	Date				
d Agency (Complete if applicable):	For SCH Use Only:				
sulting Firm:					
LESZ:	Date Received at SCH				
/State/Zip:	Date Review Starts				
	Date to Agencies				
act	1 <b>1</b>				
16: ( <u></u> )	Date to SCH				
	Clearance Date				
O	Notes:				
plicant: County of San Diego					
iress: 5201 Ruffin Road					
/State/Zip: San Diego, CA 92123					
ne: (619) 694-3016					
IIC. ( 327) _ 077 3010	Revised October 1989				

## East Otay Mesa Specific Plan Draft Environmental Impact Report (GPA 94-02; Log No. 93-19-6)

State Clearinghouse No. 92101099

Prepared for
County of San Diego
Department of Planning and Land Use
5201 Ruffin Road, Suite B
San Diego, CA 92123-1666

Prepared by
Ogden Environmental and Energy Services Co., Inc.
5510 Morehouse Drive
San Diego, California 92121

(619) 458-9044

October 1993 Project No. 110700010

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#### **EXECUTIVE SUMMARY**

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#### **ES.1 PROJECT DESCRIPTION**

The County's Otay Subregional Plan was amended December 19, 1990 (GPA 90-04), designating 3,282 acres of East Otay Mesa as a Specific Plan Area (SPA), and incorporating East Otay Mesa Specific Plan Area guidelines. The SPA and accompanying guidelines established East Otay Mesa primarily as an industrial use area on the flatter portions of the SPA and with a residential density of 0.34 dwelling units per acre in the residentially designated hillside areas. Thereafter, the County proceeded to initiate the East Otay Mesa Specific Plan process, beginning in April, 1991.

The draft East Otay Mesa Specific Plan was completed in May 1993 and is comprised of six elements that together establish the goals, policies, and implementation strategies of the plan and represent the vision for ultimate buildout of East Otay Mesa as an international industrial and business park. The six elements are: land use; conservation/open space; circulation; urban design; public facilities; and phasing, financing and implementation. The East Otay Mesa Specific Plan also establishes regulatory provisions and procedures and site planning and design guidelines for implementing the specific plan.

The Land Use Element establishes the proposed land use districts in the East Otay Mesa SPA. Table 3-1 in Section 3.0 of this EIR contains the land use statistics for the six land use districts: Industrial, Commercial (Regional and District), Fire/Sheriff Station, MTDB Station, SR-125 Right-of-Way, and Hillside Residential. The Specific Plan applies the County's Sensitive Resource Area Regulations (also called the "G" Designator Overlay District) to areas within the SPA that are known to be biologically sensitive.

The Specific Plan also contains an Urban Design Element which outlines design guidelines to create a modern industrial and business district, with landscaped streets and high quality structures, that has a distinctive signature image.

#### ES.2 ENVIRONMENTAL ANALYSIS

Table ES-1 provides a summary of project impacts, recommended mitigation measures, and residual impacts after mitigation, for the proposed Specific Plan. As illustrated in Table ES-1, implementation of the proposed project could result in unmitigable impacts for

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#### Table ES-1

# SUMMARY OF IMPACTS AND MITIGATION FOR THE EAST OTAY MESA SPECIFIC PLAN

(Impacts and mitigation measures are discussed in detail in the appropriate sections of this EIR)

I. Unavoidable Significant Environmental Impacts (Lead Agency must issue a "Statement of Overriding Considerations" under Sections 15093 and 15126(b) of the State CEQA Guidelines if the Project is approved)

Issue Area	Impact	Mitigation	Residual Impact
BIOLOGY	Potential impacts to 27 acres of <i>Stipa</i> grassland. Impacts to 400 acres of nonnative grassland (habitat to raptor species and burrowing owl).	onsite into designated open space, and maintain corridor between preserved grassland habitat and open space in	unmitigable. Impacts shall be substantially lessened
	Potential impacts to vernal pools: J22 complex (near Johnson Canyon), and potential vernal pool habitat along U.S./Mexico border.	complex (including watershed); provide buffers.	vernal pools is significant
	Potential impacts to 800 acres of coastal sage scrub (280 in Industrial district and remainder in Hillside Residential).	onsite in designated open space through participation	of habitat is significant and

# SUMMARY OF IMPACTS AND MITIGATION FOR THE EAST OTAY MESA SPECIFIC PLAN

Issue Area	sue Area Impact Mitigation		Residual Impact	
BIOLOGY (Continued)	Potential impacts to several sensitive plant species including two endangered plant species: Eryngium aristulatum var. parishii (San Diego Button-celery), Calochortus dunnii (Dunn's Mariposa Lily), and Hemizonia conjugens (Otay Tarplant) and several candidates for federal listing as indicated on Table 4.3-8 in this EIR.	preservation of habitat in which the plant species	Unavoidable impacts must be substantially lessened through offsite preservation, transplantation, reintroduction and other salvage techniques (described in Table 4.3-8); however, impacts would remain significant and unmitigable.	
	result of direct and indirect impacts: Western Spadefoot	species by preservation of habitat including coastal sage scrub, all vernal pools, acquisition of raptor habitat through implementation of	only be lessened for some species through onsite habitat restoration. Impacts would remain significant	
	pairs of California	consistency with regional planning efforts which will require that large portions of coastal sage scrub habitat be		
NOISE	impact noise sensitive receptors adjacent to certain roadway segments including impacts to 6 existing residences, potential new residential uses, offsite	located within the 60 CNEL noise contour shall have a site-specific noise study prepared with mitigation measures such as noise barriers, setbacks, and	remain significant and unmitigable.	

Issue Area	Impact	Mitigation	Residual Impact
II. Significan CEQA Gu	t Environmental Impacts That ( idelines)	Can Be Avoided or Mitigated (	Section 15126(c) of the State
LAND USE	Land use interface between proposed residential uses and the State prison, the County detention facility, proposed industrial development, the approved International Raceway, and proposed OHV park.	include provision of landscaped buffers between residential and non- residential uses, adherence to noise mitigation,	Less than significant
	Impacts to Western Land Boundary Monument #252.	Site distance of 1 foot shall be maintained between boundary monument and adjacent monuments and access for maintenance shall be provided.	Less than significant
	Loss of small amounts of important farmlands.	No mitigation; however, Specific Plan allows agricultural as an interim use.	Less than significant
	Policy inconsistencies with the Otay Subregional Plan guidelines for the SPA regarding protection of sensitive resources.	include a comprehensive open space system that	Less than significant.
	Incompatibility between future 60 CNEL noise contour of Brown Field and the proposed Hillside Residential area north of Lone Star Road.	must mitigate for noise impacts as required in Section 4.8 (Noise) of this	Less than significant.
•	Inconsistencies with goals and preliminary plans for the Otay Valley Regional Park which identifies Johnson Canyon as a Natural Open Space Preserve.	Otay Valley Regional Park Progress Plan shall be evaluated by the County and	Less than significant.

Issue Area	Impact	Mitigation	Residual Impact
LANDFORM ALTERATION /VISUAL QUALITY	Landform alteration impacts could occur in Hillside Residential districts in areas that contain steep slopes.	shall be prepared with	Less than significant.
BIOLOGY	Potential impact to one acre of Southern Interior Cypress Forest.		Less than significant.
	Potential impacts to 13 acres of wetlands or "Waters of the U.S."		Less than significant.
	Potential impacts to Rock Outcrops/Bedrock.	Preserve rock outcrops in O'Neal Canyon.	Less than significant.
	Potential obstruction of wildlife corridor in O'Neal Canyon from proposed Alta Road.	corridor in designated open	Less than significant.
	Impacts to several sensitive animal species such as Coastal Western Whiptail, Coastal Rosy Boa, Two-stripted Garter Snake, Bell's Sage Sparrow, Mountain Lion, Mule Deer, and several other species listed in Table 4.3-9.	species; includes habitat preservation such as wetlands, drainages, and coastal sage scrub, and maintenance of wildlife	

Issue Area	Impact	Mitigation	Residual Impact
BIOLOGY (Continued)			
	Indirect impacts to habitat for animal species from edge effects, noise, lighting, etc. Increased sedimentation and runoff affecting water quality.	management and emergency access plan; incorporate	Less than significant.
CULTURAL RESOURCES	Potential to impact 51 archaeological sites. If sites are determined to be important through testing, than disturbance would represent a significant impact.	sites must be tested to determine site importance. Field surveys required for	Less than significant.
GEOLOGY/ SOILS	Potential geotechnical impacts due to following conditions onsite:		Less than significant.
	Potential for ground acceleration/ground shaking due to seismic activity.	Design and construct project in accordance with UBC seismic design parameters.	Less than significant.

Issue Area	Impact	Mitigation	Residual Impact
GEOLOGY/ SOILS (Continued)	Areas are susceptible to liquefaction and seismically induced settlement.	Incorporate remedial grading and design techniques into design including removal and replacement of liquefiable soils or construction of deep foundation systems.	Less than significant.
	Open reservoirs onsite susceptible to overtopping during seismic event resulting in flooding areas downstream.	prepare flood control plans for areas adjacent to or	Less than significant.
	Geologic materials onsite may contain adverse bedding or other strata subject to failure.	static slope stability	Less than significant.
	Soils related hazards such as soil erosion, expansion, or settlement could occur.		Less than significant.
HYDROLOGY /WATER QUALITY	Increased runoff into the Otay River Watershed from development adjacent to Johnson and O'Neal Canyons.	individual projects are proposed to construct onsite	Less than significant.

. Issue Area	Impact	Mitigation	Residual Impact
HYDROLOGY /WATER QUALITY (Continued)		The County and property owners shall comply with Best Management Practices of the Clean Water Act.	
	Increased sedimentation into drainages affecting water quality.	Construction techniques that prevent erosion and offsite transport of sediment shall be incorporated into construction plans for individual projects.	•
TRANSPORT ATION/ CIRCULA- TION	Interjurisdictional inconsistencies in future roadway designations currently exist between the County and adjacent cities (San Diego and Chula Vista).	Chula Vista to resolve inconsistencies and coordinate roadway design	Less than significant.
NOISE	Future 60 CNEL noise contour from Brown Field may impact proposed residential uses in Hillside Residential district.	shall be avoided within the projected 60 CNEL noise	Less than significant.
	Siting of noise generating industrial and commercial land uses in vicinity of existing or proposed noise sensitive land uses may create significant noise impacts.	moderate to high noise producing operations are located further from noise sensitive receptors. Site-	Less than significant.

Issue Area	Impact	Mitigation	Residual Impact
NOISE (Continued)	Noise from interim land uses such as the proposed State OHV park, the approved San Diego International Raceway, and construction noise could potentially impact future residences in the vicinity.	demonstrate that appropriate noise impact mitigation measures are included in the	Less than significant.
AIR QUALITY	construction equipment exhaust, worker vehicle exhaust, and construction	techniques to reduce construction emissions as outlined in Section 4.9 of	Less than significant.
	Future vehicle emissions associated with trips to and from SPA show substantial increase at project buildout over existing ambient air quality.	techniques and design features into projects to	Less than significant.
HEALTH AND SAFETY	Use and transport of hazardous materials within the Industrial district could expose people to hazardous materials.	Management Plans shall be prepared to ensure that no	Less than significant.

## SUMMARY OF IMPACTS AND MITIGATION FOR THE EAST OTAY MESA SPECIFIC PLAN

Issue Area	Impact	Mitigation	Residual Impact
PUBLIC SERV			•
Schools	Potential addition of students to already over-capacity systems in San Ysidro and Sweetwater Union High School districts.	proposed shall obtain a good will serve letter from the	Less than significant.
Water	Contribution to cumulative impacts on regional water system.		Less than significant.
Wastewater	No established method of wastewater disposal beyond the first 400 net acres of development in Phase 1, is available for the SPA.	shall be allowed beyond that which can be served by the	Less than significant.
Solid Waste	Available capacity for solid waste disposal is currently limited to capacity of the Otay Landfill.	those allowed under Phase 1	Less than significant.

### III. Issues Considered But Found Not To Have Adverse or Significant Impacts.

Fire Protection and Emergency Services, Police Protection, Parks and Recreation, Library Facilities, and Gas and Electricity. Also, project would result in positive socioeconomic impacts.

certain aspects of biology and noise if full mitigation (i.e., complete avoidance of impact) cannot be accomplished. If all the mitigation measures recommended in this Draft EIR are implemented, significant impacts to land use, landform alteration/visual quality, cultural resources, geology and soils, hydrology and water quality, transportation, air quality, health and safety, and public services can be mitigated to a level less than significant. However, some biology and noise issues, as listed in Table ES-1, would remain significant.

The following issue areas were determined, based on the analysis in this EIR, to have less than significant effects on the environment and required no mitigation: public service issues for fire protection and emergency services, police protection, parks and recreation, library facilities, and gas and electricity. In addition, the project would create beneficial impacts to socioeconomic conditions in the area.

#### ES.3 ALTERNATIVES

Three alternatives to the proposed project are analyzed in this EIR: 1) the no project alternative, 2) the existing Otay Subregional Plan alternative, and 3) the environmentally preferred alternative. These are compared in Table 5-2 of this EIR.

Under the no project alternative, the Specific Plan would not be adopted; and existing land uses would continue on the project site (agricultural operations, an auto auction use, and scattered homes). Other land uses that would potentially be developed in the area are the Otay Mesa OHV park and the American International Raceway. Several of the environmental impacts listed in Table ES-1 would not occur under this alternative; however, impacts from the existing and proposed land uses in the area would still potentially occur. This alternative would not be consistent with the County's land use plan for the East Otay area and would not realize the potential beneficial socioeconomic impacts associated with the implementation of the Specific Plan.

The existing Otay Subregional Plan alternative is similar to the proposed project with the exception of the location of the industrial area and the density of the residential area. The boundary between the industrial and residential areas is located further eastward on the Otay Subregional Plan map than on the proposed Specific Plan land use map; therefore, a greater number of industrial acreage would be allowed. More detailed environmental analysis performed as part of the Specific Plan justified moving the industrial boundary out

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of the hillside area. Although many of the impacts associated with the project exist for this alternative as well, the hillside area would be impacted to a higher degree under the Otay Subregional Plan alternative because a larger amount of the hillside area would be available for industrial development. A greater number of homes would also be allowed in the hillside residential area.

The environmentally preferred alternative allows industrial development only in the less sensitive areas of the SPA. This alternative preserves several areas on the project site considered environmentally sensitive such as the coastal sage scrub, vernal pools, and native grassland. These areas would be designated as permanent open space rather than industrial and residential. The amount of industrial acreage would be substantially reduced. Many of the biological impacts associated with the project would be eliminated under this alternative including impacts to sensitive vegetation communities and plant and animal species as discussed in Section 5.3.3 of this EIR. Other impacts that would either be substantially reduced or eliminated include land use and noise impacts.

#### **ES.4 MITIGATION MONITORING PROGRAM**

To implement and monitor the mitigation measures contained in this EIR, a mitigation monitoring program (MMP) is required per AB 3180 as a condition of approval of the Specific Plan. An MMP will be prepared as part of the Final EIR.

#### 1.0 INTRODUCTION

#### 1.1 PURPOSE

This Environmental Impact Report (EIR) was prepared for the County of San Diego for the proposed East Otay Mesa Specific Plan. The EIR addresses the potential environmental impacts resulting from the development of the proposed land uses in the East Otay Mesa Specific Plan. The EIR focuses on the following issue areas identified as having potentially significant impacts on the environment: land use; landform alternation/visual quality; biological resources; cultural resources; geology/soils, hydrology and water quality; transportation and circulation; noise; air quality; health and safety; public services and utilities; and population/housing/employment.

#### 1.2 Environmental Process

This document was prepared in accordance with the criteria, standards, and procedures of the California Environmental Quality Act (CEQA) (California Public Resources Code, Section 2100 et seq), the State CEQA Guidelines as amended in June 1986 (California Code of Regulations, Section 15000 et seq), and the County of San Diego CEQA Guidelines (August 1991). An EIR is an informational document which is designed to inform decision-makers, other responsible or interested agencies, and the general public of the potential environmental effects of a proposed project. The environmental review process was established to enable public agencies to evaluate a project in terms of its environmental consequences, to examine and implement methods eliminating or reducing any potentially adverse impacts, and to consider alternatives to the project as proposed. While CEQA requires that major consideration be given to avoiding environmental damage, the lead agency and other responsible public agencies must balance adverse environmental effects against other public objectives, including economic and social goals, in determining whether and in what manner a project should be approved. The lead agency for this project is the County of San Diego Department of Planning and Land Use.

The County of San Diego Department of Planning and Land Use has filed a Notice of Preparation (NOP) with the State Office of Planning and Research. Concerns generated during the NOP review from state and local agencies and other interested parties were incorporated into this document. This Draft EIR will be available for review by the public and public agencies for a period of 45 days. Notice of availability of the Draft EIR and the

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date of the public hearing will be published in local newspapers concurrently with the public distribution of this document. Comments on this report are invited and may be submitted to Gary R. Fink, County of San Diego DPLU, 5201 Ruffin Road, Suite B, San Diego, California, 92123-1666. The Department of Planning and Land Use will consider all written comments on the Draft EIR before making recommendations to the County Board of Supervisors regarding the extent and nature of the environmental impacts of the proposed project.

#### 1.3 MITIGATION MONITORING AND REPORTING PROGRAM

General guidelines for a monitoring and reporting program for the proposed East Otay Mesa Specific Plan are included in this EIR in response to AB 3180; California Public Resources Code Section 21081.6. This program is designed to ensure compliance with adopted mitigation measures and to verify that the required measures are effective at reducing identified significant impacts to below a level of significance. The mitigation monitoring program will be applied to those mitigation measures which have been adopted by County decision-makers as conditions of approval for the East Otay Mesa Specific Plan in response to identified significant and potentially significant impacts.

#### 1.4 DOCUMENT ORGANIZATION

This Draft EIR is organized as follows: The Executive Summary contains a summary of the potential impacts of the East Otay Mesa Specific Plan; Section 2.0 describes the environmental setting of the project site; Section 3.0 provides a detailed description of the location, characteristics, background and objectives of the project, and outlines the steps for Specific Plan implementation including the required discretionary actions; and Section 4.0 contains the environmental analysis of project-specific effects of the East Otay Mesa Specific Plan. The environmental issues addressed within Section 4.0 include: land use; landform alternation/visual quality; biological resources; cultural resources; geology/soils, hydrology and water quality; transportation and circulation; noise; air quality; health and safety; public services and utilities; and population/housing/employment. Alternatives, including the No Project alternative, are evaluated within Section 5.0. Growth inducing effects and cumulative impacts of the proposed project are discussed in Sections 6.0 and 7.0, respectively. Section 8.0 addresses significant irreversible changes and Section 9.0 discusses effects found not to be significant. Section 10.0 assesses the relationship between short-term uses and long-term productivity. Sections 11.0, 12.0, and

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13.0 contain the consultant identification; persons and agencies consulted; and references cited, respectively.

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#### 2.0 ENVIRONMENTAL SETTING

The East Otay Mesa Specific Plan project area is in the southwestern portion of San Diego County, immediately adjacent to the United States/Mexico International Border. Otay Mesa is one of a series of marine wave-cut terraces, typical of the San Diego region. The majority of the project area is characterized by flat mesa tops that are occasionally interrupted by steep sloping finger canyons in the western portion of the project area; and rolling hills and steeper mountain slopes rising eastward to the San Ysidro Mountains in the eastern portion of the project area. The two major canyons, O'Neal and Johnson, have been deeply cut into the northernmost edge of the mesa and drain into the Otay River Valley north of the site. Elevations range from approximately 500 feet mean sea level (msl) on the mesa to over 1,400 feet msl in the San Ysidro Mountains. The only significant development in the project area are scattered agricultural operations and a few residences in the western and central portions of the site.

Soils throughout the project area include: alluvium consisting primarily of clay, silt, sand, and cobble in the drainage areas; topsoil and colluvium consisting of dark brown, silty clay, and clayey sand in the agricultural areas on the mesa; and rockier soils of cobble/sandstone conglomerate and metamorphic outcrops in the hills and slopes of the eastern portions of the project area.

The project area supports a variety of flora and fauna that are typical of the southern California coastal region. Major vegetation communities that can be found in the project area are coastal sage scrub; chaparral; non-native grassland; and agricultural lands. Most of the western and central portions of the site are void of natural vegetation due to past and present agricultural operations. The project area supports a high diversity of flora and fauna (including significant populations of sensitive species, such as the California gnatcatcher) due to the variety of habitat types and the spatial contiguity with extensive undeveloped areas to the east. Canyons and drainages in the area (including Johnson and O'Neal Canyons) function as significant wildlife corridors which provide vital connections between the Otay River Valley and the extensive natural habitat to the east.

To the west of the project area is the City of San Diego's Otay Mesa Community Plan area which currently has 3.1 million square feet of industrial space and is planned for predominantly industrial and residential land uses with commercial nodes at the U.S./Mexico border. Brown Field, a general aviation airport, is also located west of the

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project area in the City of San Diego. To the immediate north of the site and located between O'Neal and Johnson Canyons is the Donovan State Correctional Facility, operated by the State of California Department of Corrections. North of O'Neal Canyon is the County East Mesa Detention Facility. Further north of the project area is Otay River Valley, site of a multi-jurisdictional planning effort to create a regional park. East of the project area are the steep undeveloped slopes leading into the San Ysidro Mountains. The City of Tijuana, Mexico is immediately south of the project area across the international border and is occupied by industrial and intensive residential land uses. The Rodriguez International Airport is located approximately 1 mile southwest of the project area within eastern Tijuana.

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#### 3.0 PROJECT DESCRIPTION

#### 3.1 PROJECT LOCATION

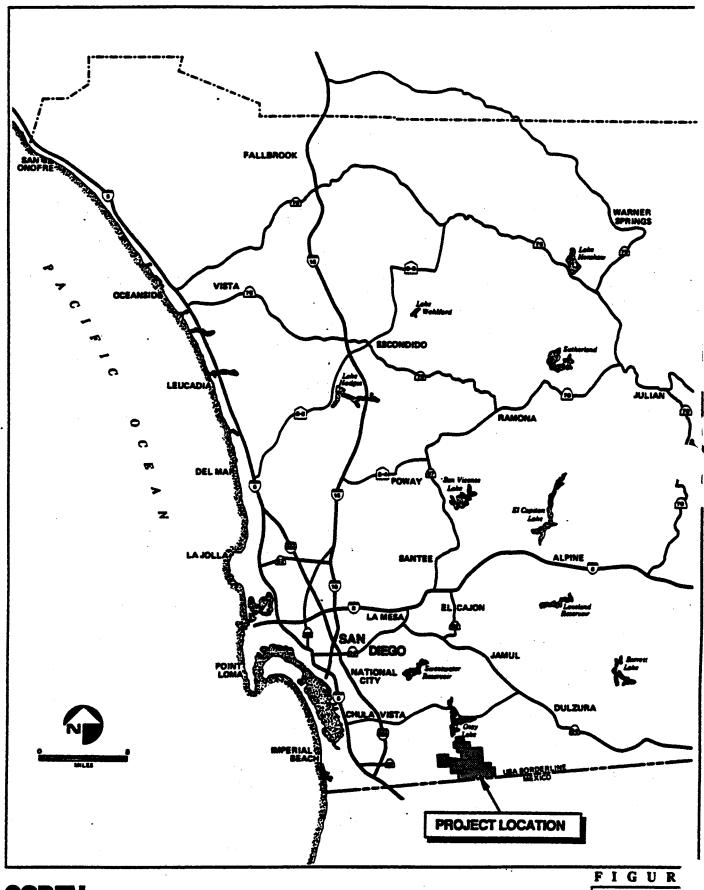
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East Otay Mesa encompasses an area of approximately 5,200 unincorporated acres in southwestern San Diego County extending generally from the Otay River Valley southerly to the United States/Mexico International Border (see Figure 3-1). The project site encompasses the eastern one-half of Otay Mesa to the foothills of the San Ysidro Mountains. The site shares its western boundary with the city of San Diego and a portion of its northern boundary with a 23,000-acre planned "new town," known as Otay Ranch and the California state prison property (Donavan Correctional Facility) (see Figure 3-2). The County Detention Facility is located on the northern portion of the site adjacent to O'Neal Canyon. Portions of the western boundaries are formed by Piper Ranch Road and Enrico Fermi Drive. The Otay Mesa International Border Crossing is located just west of the site. Brown Field is located approximately one-half mile to the west. Bureau of Land Management (BLM)-owned land is located to the east of the site in the San Ysidro Mountains.

Access to East Otay Mesa is from the north and west via Interstate 805 and Otay Mesa Road. Proposed State Route 125 (SR-125) (projected to begin construction in 1997), will travel through the western portion of the site in a north/south direction. The western and central portions of the East Otay Mesa site are relatively flat with the exception of Johnson Canyon which enters the northwestern portion of the site and gradually widens into a broad valley in a southeasterly direction. The eastern portion of East Otay Mesa is characterized by hilly terrain transitioning into steep mountains. Elevations range from 500 feet mean sea level (MSL) in the west rising to over 1,400 feet MSL in the San Ysidro Mountains. Most of the site is undeveloped with the exception of scattered agricultural operations on the mesa.

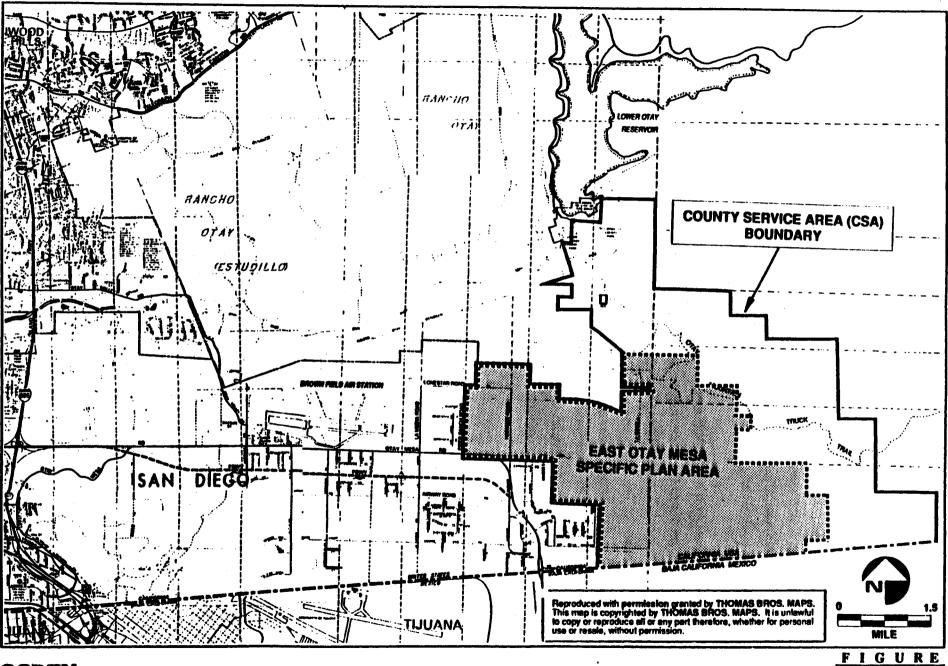
Due to past and present agricultural operations, most the western and central portions of the site are denuded of natural vegetation. The eastern area is comprised of mostly coastal sage scrub and chaparral. Several drainages traverse the site, most notably: Johnson Canyon, a small portion of Otay River Valley, and O'Neal Canyon as well as smaller unnamed drainages that originate in the San Ysidro Mountains. O'Neal Canyon traverses the northern portion of the site connecting the Otay River Valley easterly to the San Ysidro Mountains.

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Regional Location of Project Site



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**Project Site and Vicinity** 

FIGURE

#### 3.2 PROJECT BACKGROUND

In 1983, the County adopted the Otay Subregional Plan as part of the Land Use Element of the San Diego County General Plan. The Otay Subregional Plan designated 2,730 acres (83 percent) of the East Otay Mesa area as predominantly General Industrial (16), with development prohibited in areas of 25 percent slope or greater. The hillside areas east of the General Industrial area were designated as Estate Residential (17) (421 acres), Multiple Rural Use (18) (92 acres), and 58 acres as an Impact Sensitive Area (24).

The East Otay Mesa County Service Area (CSA) Number 122 was formed in 1987 by the County and the East Otay Mesa Property Owners Association to assess property owners in funding a specific plan for East Otay Mesa. In 1990, the County zoned approximately 3,282 acres of the East Otay Mesa CSA as S-88 Specific Plan Area (SPA) to initiate a planning framework for a comprehensive approach to the future development of the East Otay Mesa area. The underlying land use designations for East Otay Mesa as stated in the Otay Subregional Plan remain in effect as (16) General Industrial and the low density residential development designations of (17) Estate Residential, (18) Multiple Rural Use, and (24) Impact Sensitive.

In 1991, the County initiated a process to prepare a specific plan document that would establish a planning framework to support the industrial development of the East Otay Mesa SPA and implement the Otay Subregional Plan designations. Development of the draft East Otay Mesa Specific Plan occurred over an 18-month period and involved a multi-phase process with extensive property owner and public agency participation. An environmental data base of the entire CSA was compiled consisting of biological and cultural resources, slope, geotechnical characteristics, flooding and land use constraints. With this information, an opportunity and constraints analysis was performed to identify the developable and undevelopable lands within the East Otay Mesa SPA based on environmental considerations. Extensive information was also collected for public facility, transportation, and economic factors. The second phase of the process explored alternative land use, circulation, and infrastructure concepts, and a preferred plan and facility phasing and financing strategy was adopted by County staff and the property owners in December 1992. Through this process, the proposed East Otay Mesa Specific Plan was developed. The plan also consists of the following supporting documents:

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- Industrial Market Study
- Environmental Resources and Constraints Report
- Circulation Element
- Comprehensive Flood Control Master Plan
- Water, Sewer, and Reclamation Report
- Conceptual Improvement Plans and Cost Estimates for Backbone Roadways and Infrastructure
- Facility Phasing, Financing, and Implementation Plan

The Specific Plan text and above-listed documents are available for review at the County of San Diego Department of Planning and Land Use.

#### 3.3 PROJECT OBJECTIVES

The project objectives are contained within the draft East Otay Mesa Specific Plan text as goals. They are as follows:

- Promote a well-organized international industrial and business district in East
   Otay Mesa to attract and accommodate forecasted growth.
- Promote the conservation of open space to preserve environmental resources and provide recreational opportunities for the industrial workforce and surrounding community residents.
- Provide a highway, street, rail, and transit network adequate to handle subregional traffic at acceptable service levels.
- Promote well designed infrastructure, buildings and landscape, both in the public and private realms, that create a strong image and sense of identity for East Otay Mesa.
- Provide infrastructure and public facilities in a planned and orderly fashion which will accommodate the planned growth in East Otay Mesa while meeting applicable County standards.

Provide public facilities to serve East Otay Mesa in a planned, orderly fashion,
phased non-geographically in response to market demand, financed through the
equitable participation of all affected property owners and developers, and
implemented by a public-private partnership.

#### 3.4 PROJECT CHARACTERISTICS

The County's Otay Subregional Plan was amended December 19, 1990 (GPA 90-04), designating 3,282 acres of East Otay Mesa as a Specific Plan Area (SPA), and incorporating East Otay Mesa Specific Plan Area guidelines. The East Otay Mesa SPA was placed in an S88 District-Specific Plan Use Regulations zone with a residential density of 0.34 dwelling units per acre allowed in the residentially-designated hillside areas. Thereafter, the County proceeded to initiate the East Otay Mesa Specific Plan process, beginning in April, 1991.

The draft East Otay Mesa Specific Plan was completed in May 1993 and is comprised of six elements that together establish the goals, policies, and implementation strategies of the plan and represent the vision for ultimate buildout of East Otay Mesa as an international industrial and business park. The six elements are: land use; conservation/open space; circulation; urban design; public facilities; and phasing, financing and implementation. The East Otay Mesa Specific Plan also establishes regulatory provisions and procedures and site planning and design guidelines for implementing the specific plan. Following is a brief description of each of the elements.

#### Land Use Element

The Land Use Element establishes the proposed land use districts in the East Otay Mesa SPA. Table 3-1 lists the proposed land use districts and gross acres contained in the Specific Plan. Figure 3-3 illustrates the proposed Land Use Plan. The East Otay Mesa Specific Plan proposes 2,359.55 acres of Mixed Industrial; 154.02 acres of Commercial (this encompasses 129.63 acres for a Regional Center and 24.39 acres for a District Center); 1.79 acres for a joint fire and sheriff station and 4.92 acres for a trolley (MTDB) station; 753.40 acres of Hillside Residential; and 26.44 acres of SR-125 and MTDB right-of-way for a total gross acreage of 3,300.12. The portion of East Otay Mesa not in the SPA but within the East Otay Mesa CSA would remain under its current General Plan

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Table 3-1 EAST OTAY MESA SPECIFIC PLAN LAND USE STATISTICS

Proposed Land Use	Estimated Gross Acres ¹	Floor Area Ratio	Estimated Square Feet at Build Out ²	Dwelling Units
Industrial	2,359.55	0.40	32,890,239	
Commercial				
Regional	129.63	0.25	1,129,337	
District	24.39	0.25	212,486	
Fire/Sheriff Station	1.79 ³	NA	NA	
MTDB Station	4.924	NA	NA	
SR125 Right-of-Way	26.44	NA	NA	
Hillside Residential	753.40	NA	NA	37.67
Total	3,300.12		34,232,062	37.67

1

Source: East Otay Mesa Specific Plan, Draft for Public Review, June 1993 (prepared by HGHB).

Acres are accurate within 1%
 Calculated using net acres (80% of gross)
 Underlying zoning is Industrial
 Underlying zoning is Regional Commercial

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Land Use Plan

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designation of Estate Residential (17) and Multiple Rural Use (18) and would not be affected by the East Otay Mesa Specific Plan.

The Mixed Industrial District is intended primarily for wholesale storage and distribution, research services, and general industrial. General industrial is defined as industrial plants primarily engaged in manufacturing, compounding, processing, assembling, packaging, treatment or fabrication of materials and products. Compatible commercial types of use are also permitted in the Industrial district; for example, construction sales and services, automotive and equipment uses, and custom manufacturing. Heavy industrial uses will not be permitted in East Otay Mesa.

The Regional Commercial District allows large retail stores, warehouse-type retail, and other compatible retail uses. The location for the proposed 129.6-gross-acre Regional Commercial Center was selected based on proximity to planned freeways and the transit station. The District Commercial Center land use area is to serve the industrial workforce within East Otay Mesa. It would typically include a super drug store and other smaller retail and eating establishments. Support commercial uses will also be permitted throughout the East Otay Mesa industrial area. These uses would serve the daily convenience needs of the industrial workforce and may be incorporated within industrial buildings, or located in a separate building on an industrial site. The Specific Plan encourages transit-oriented development within the Regional Commercial District.

The Hillside Residential District in the eastern edge of the East Otay Mesa SPA allows low-density (1 dwelling unit per 20 acres) rural residential land use. The entire 753.4 acres of the residentially zoned land is proposed to be designated as a "G" Sensitive Resource Area which requires environmental review of residential proposals and allows for clustering of units to protect sensitive areas.

Buildout of the East Otay Mesa area is expected to occur by the year 2020 (Shapouri 1993). During this period, interim uses (e.g., agricultural uses, vehicular storage, public recreation and spectator events) will be allowed on industrial and commercial lands.

The project is expected to occur in two phases as dictated by public facility limitations (i.e., availability of wastewater treatment capacity and transportation improvements). Phase 1 would accommodate up to 500 gross acres of development and Phase 2 would accommodate the remaining available development.

### Conservation and Open Space Element

Figure 3-4 illustrates environmentally sensitive lands onsite identified during the Specific Plan preparation process that contain primarily steep slopes and biological resources. The Specific Plan applies the County's Sensitive Resource Area Regulations (also called the "G" Designator Overlay District) to the areas shown on Figure 3-4. The areas with "G" Designator include the eastern portion of the Industrial district and all of the Hillside Residential district. Two small areas designated Mixed Industrial located near Johnson Canyon and the U.S./Mexico border also contain sensitive biological resources and are classified as "G" Designator. The Sensitive Resource Area regulations require that a detailed review of environmental impacts be performed during the site plan review process and findings be made by the County that a proposed project within this area will result in minimal disturbance of environmentally sensitive lands. The Specific Plan also requires that prior to approving any subdivision of land with a "G" Designator, a resource protection plan be approved by the County, with concurrence from appropriate State and Federal regulating agencies.

Figure 3-5 illustrates the East Otay Mesa proposed Open Space Plan. The Open Space Plan recognizes the Focus Planning Area for the planned Otay River Valley Regional Park. A joint powers authority agreement has been executed by the County of San Diego and the cities of Chula Vista and San Diego to plan and acquire land for this major regional park. The East Otay Mesa Open Space Plan proposes a trail corridor within Johnson and O'Neal Canyons to connect the Otay River Valley to the San Ysidro Mountain area east of East Otay Mesa. The Open Space Plan does not designate any lands as open space, but uses the "G" Designator (discussed in this section) to protect environmentally sensitive lands.

#### Circulation Element

The Circulation Element sets the framework for the circulation system. Figure 3-6 illustrates the proposed streets to accommodate the projected buildout traffic volumes. The proposed streets system was determined based upon traffic analysis conducted in conjunction with the development of the Circulation Element.

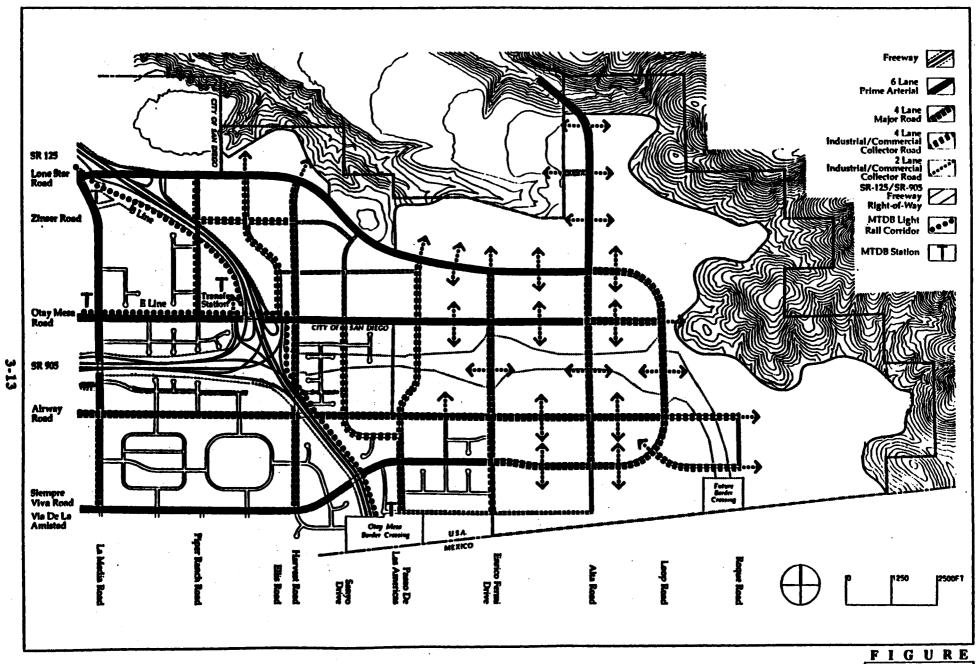
The proposed Circulation Plan incorporates a system of arterials that will provide internal circulation throughout the Specific Plan Area as well as access to the regional freeway

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Areas Subject to Sensitive Resource Area Regulations (Classified as "G" Designator)

FIGURE

Open Space Plan



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**Circulation and Transit Plan** 

system. Lone Star Road, Otay Mesa Road, and Siempre Viva Road are designated as Prime Arterials to carry traffic east-west to the freeway. Alta Road is also designated as a Prime Arterial north of Lone Star Road to serve traffic heading north to Otay Ranch. Airway Road and each of the north-south roads are designated as Major Arterials or two- or four-lane Collector Roads in the Circulation Plan. Each of these roadways serve the internal circulation demand, as well as distribute the regional traffic from the Prime Arterials to each of the land uses within the SPA.

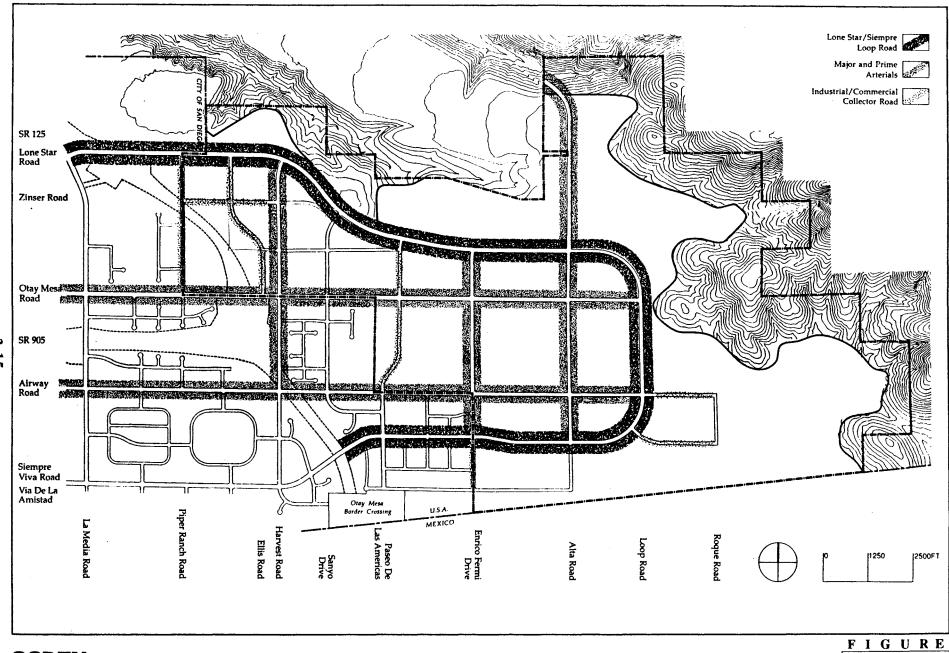
The proposed streets have been developed assuming that SR-905 would be constructed east to SR-125. Possible extension of SR-905 east of SR-125 to a future international border crossing has also been discussed in the Specific Plan. If SR-905 is extended through the Specific Plan Area, interchanges would be proposed at Enrico Fermi Drive and Loop Road and the eastbound off-ramp at Otay Mesa Road would be eliminated. The location of freeway interchanges on these facilities would alter travel patterns and change the function of these roadways. For this reason, the Specific Plan recommends that right-of-way be preserved to allow future conversion from Major to Prime to accommodate the freeway extension on the following facilities:

- Loop Road Airway Road to Alta Road
- Enrico Fermi Drive Airway Road to Otay Mesa Road

The Circulation Element establishes roadway standards for street classifications, truck routes, intersections, intersection spacing and alignment, and driveway widths and locations. The element also addresses alternative modes of transportation such as public transit, freight rail service, bicycle routes and facilities, and pedestrian circulation.

#### **Urban Design Element**

The Urban Design Element presents the overall design concept for the East Otay Mesa SPA. The intent is to create a modern industrial and business district, with landscaped streets and high quality structures, that has a distinctive signature image. The elements used to create an areawide design concept and image are: prominent landforms and natural features, the public streetscape, a unified pattern of private development, distinctive public buildings, and special visual amenities such as public art. The Streetscape Plan requires special treatment such as street trees and streetyard setback planting along the circulation system (see Figures 3-7 and 3-8).



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Streetscape Plan

#### **Public Facilities Element**

The Public Facilities Element describes the infrastructure and public facilities proposed for the East Otay Mesa SPA. The infrastructure includes water supply, wastewater, reclaimed water, and drainage. Public facilities include fire protection, emergency medical services, law enforcement, child care, solid waste disposal, and hazardous materials protection. The policies in the Public Facilities Element were based on the Public Facilities Element of the County General Plan and the Otay Subregional Plan. The Otay Subregional Plan establishes policies that structure how public facilities will be provided and financed in East Otay Mesa. The Plan also requires that facilities be available prior to the needs of development.

As mandated by the Otay Subregional Plan, a Public Facilities Phasing and Financing Plan was prepared as a separate document to the Specific Plan. The document is intended to be reviewed and revised periodically to reflect changing conditions. The Public Facilities Phasing and Financing Plan contains cost estimates for the areawide infrastructure and facilities needed to open East Otay Mesa to development. Recommended mechanisms for financing the infrastructure and facilities are discussed, as well as thresholds of development and phasing.

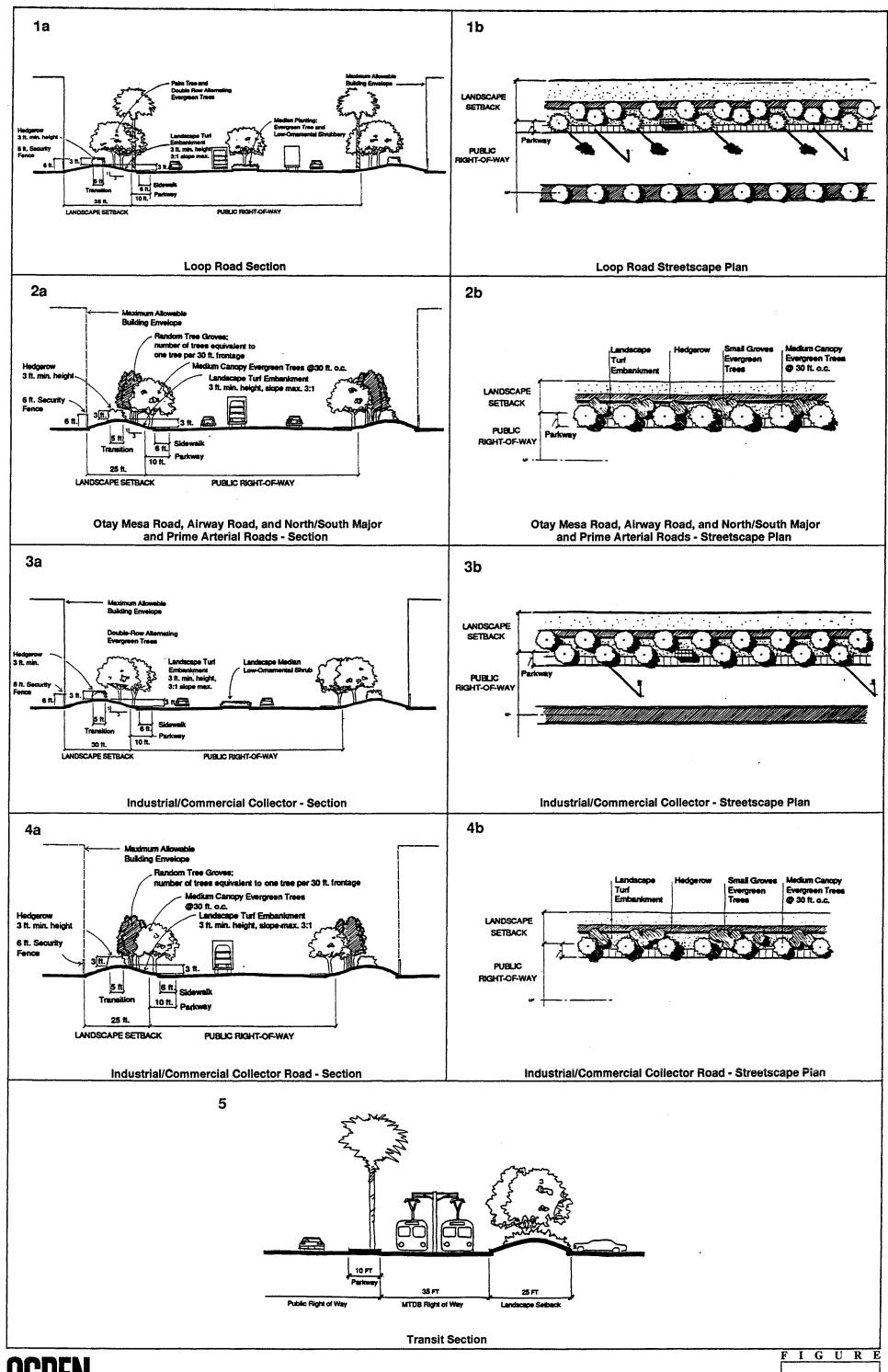
#### Facility Phasing, Financing, and Implementation Plan

This plan describes the basic phasing and financing strategy for public facilities in the East Otay Mesa SPA in accordance with the Otay Subregional Plan which establishes that public facilities for East Otay Mesa be financed through the equitable participation of all affected property owners and developers. The Facility Phasing, Financing, and Implementation Plan primarily addresses the capital facilities that are of areawide benefit, and will be financed jointly by all the property owners. The public facilities to be financed jointly by the property owners either solely or by contributing a "fair share" include: onsite roads and infrastructure; onsite capital facilities; onsite operation and maintenance; offsite roads; and offsite capital facilities.

### 3.5 SPECIFIC PLAN IMPLEMENTATION

The East Otay Mesa Specific Plan contains regulatory provisions and design guidelines for implementing the policies. The regulatory provisions for industrial development are based

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on those contained in the County's Zoning Ordinance for the M56 (Mixed Industrial) Zoning District.

### Regulatory Provisions

The regulatory provisions include a development review process; land use regulations; and development standards and described below.

Development Review Process. Three steps are required in the proposed development review process for future projects in East Otay Mesa: (1) Subdivision Review, a review of grading and land subdivision that results in an approved Tentative Map and Final Map; (2) Site Plan Review, a design review of schematic drawings that results in an approved Site Plan Permit; and (3) Codes Review, a plan check of construction documents that results in a Building Permit. A fourth type of review, a Zoning Review, resulting in a Minor and Major Use Permit, is required if the proposed land uses are not "permitted uses" under the land use regulations.

The proposed development review process is outlined in the chart on Figure 3-9. Each of the stages of the review process is explained in detail in the Specific Plan. The review processes are all standard review processes currently used by the County Department of Planning and Land Use.

Land Use Regulations. This section of the East Otay Mesa Specific Plan sets forth land use regulations for each of the land use districts in the project area. The proposed land use districts are Mixed Industrial (which includes Support Commercial), District Commercial, Regional Commercial, and Rural Residential uses. The proposed overlay districts for the East Otay Mesa SPA are the Sensitive Resource Area or "G" Designator for areas that contain sensitive resources, and the Community Design Review Area Regulations or "B" Designator.

The sensitive resource areas that are regulated in the Specific Plan by the "G" Designator are shown on Figure 3-4 and include steep slopes (over 25 percent grade) and sensitive biological resources such as wetlands, coastal sage scrub, vernal pools, and other biological resources. The County Zoning Code contains the criteria for evaluation of sensitive resources. The Community Design Review area ("B" Designator) applies to the

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FIGURE

entire SPA. The criteria proposed in the Specific Plan as regulatory provisions for these areas are the same as those contained in the County's Zoning Ordinance.

The proposed East Otay Mesa SPA Zoning Map, Figure 3-10, reflects what is shown on the proposed Land Use Plan.

<u>Development Standards</u>. The intent of the development standards is to establish basic quantifiable criteria for site development and building size. These standards in combination establish a maximum level of development intensity through the County's zoning format for setbacks, open space, parking, and special requirements for residential development.

### Site Planning and Design Guidelines

The proposed Site Planning and Design Guidelines for the East Otay Mesa SPA serve as the design manual for review of industrial and commercial projects by County staff and the Community Design Review Board as they are submitted for individual project approval. They also provide guidance to staff and the County's Planning and Environmental Review Board in reviewing subdivision applications. The guidelines are more detailed than standard County zoning and require special submittal requirements for site plan applications within the East Otay Mesa SPA. Figure 3-11 illustrates how the site planning guidelines are to be applied in the context of a typical block. The guidelines are proposed to be used as a basis for review of subdivision and site plan applications and include provisions for site grading; circulation, parking and loading; buildings and open space; landscaping; fencing; lighting; and public utility structures.

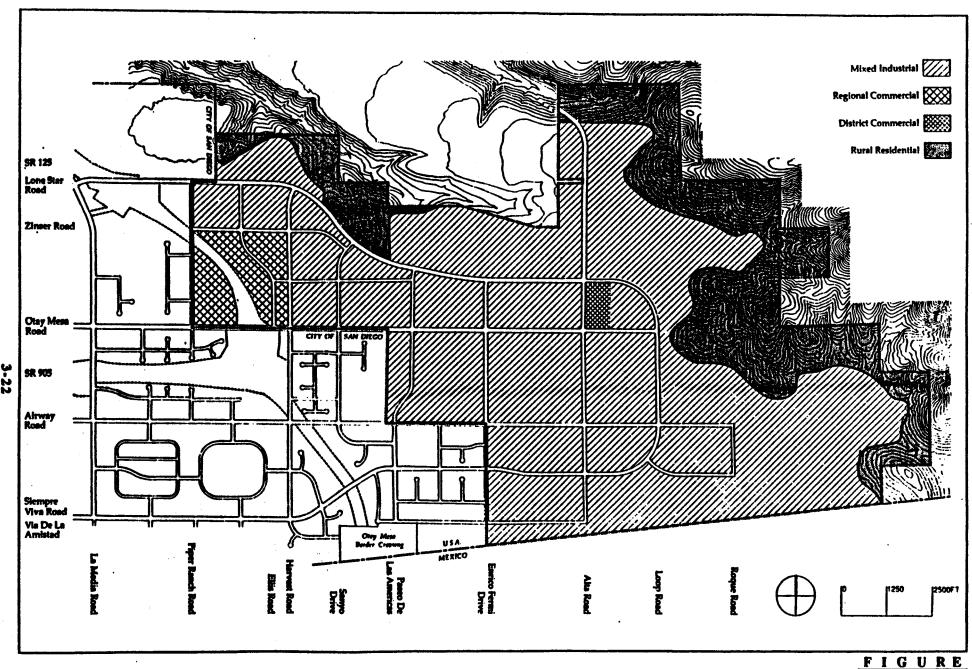
Architectural guidelines are also included in the Specific Plan for building form and massing; elevation treatment; elevation materials; treatment of entrances, windows, and doors; roof treatment; and climatic considerations. Signage guidelines also set standards and recommendations for industrial and commercial signage.

#### 3.6 DISCRETIONARY ACTIONS

The following discretionary actions will be required to implement the project:

 Planning Commission review and recommendation of approval of the East Otay Mesa Specific Plan and certification of the EIR;

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Zoning Map of the East Otem Mesa Specific Plan

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5% Service Commercial

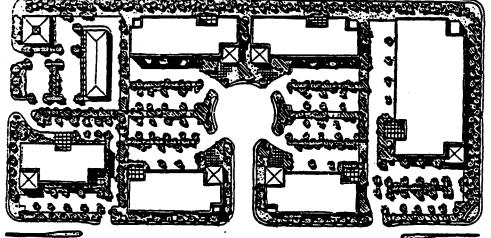
Landscaping scaled to provide view of building entrance

and Office

Outdoor open space

Landscaping of loading and parking areas

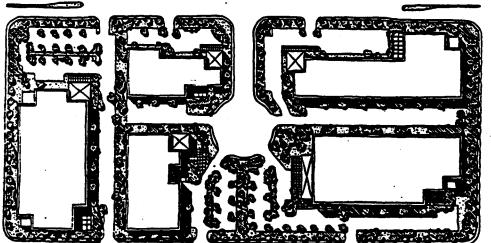
PRIME ARTERIAL No access allowed



Architectural features at corners dissolve building mass

MAJOR ROAD Limited access

Entry landscape statement and signage opportunity



Additional service accesses

Architectural features announce building entry

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INDUSTRIAL COLLECTOR

Illustrative Site Plan

FIGURE

3-11

- 2. Board of Supervisors adoption of the East Otay Mesa Specific Plan and certification of the EIR;
- 3. Creation of Sanitation District;
- 4. Extension of the rural fire district to encompass entire East Otay Mesa Specific Plan Area;
- 5. Amendment to the Otay Subregional Plan to reflect the change in location of the eastern (16) General Industrial boundary as shown on the adopted East Otay Mesa Specific Plan.

#### 4.0 ENVIRONMENTAL ANALYSIS

#### 4.1 LAND USE

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# 4.1.1 Existing Conditions

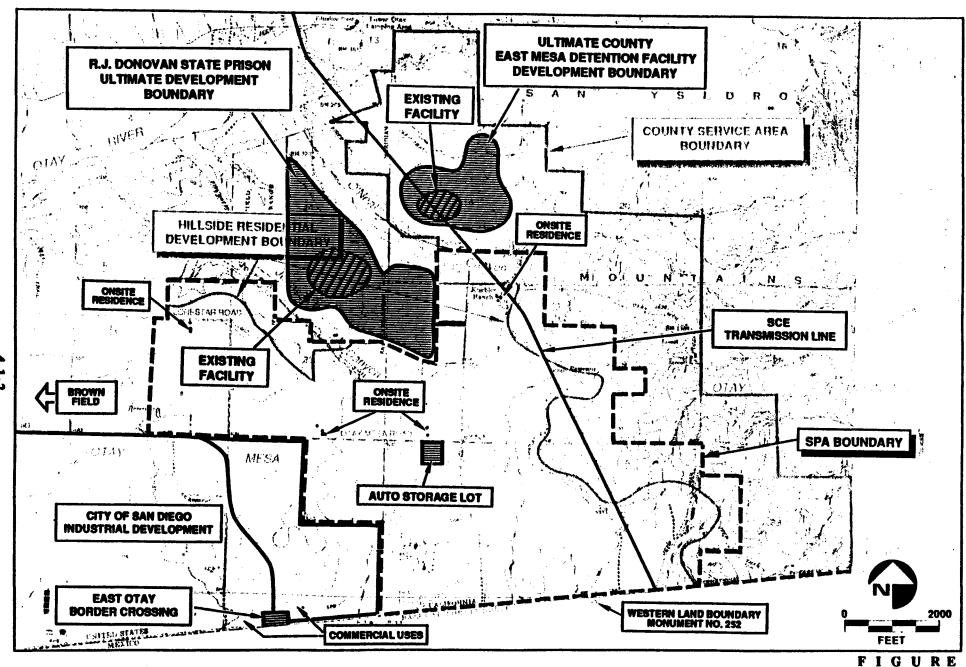
### **Existing Land Use**

Onsite Land Use. The East Otay Mesa Specific Plan Area (SPA) is undeveloped with the exception of an approximate 38-acre auto storage yard, nine dwelling units and associated sheds or other buildings, several dirt roads, few paved roads, and a San Diego Gas and Electric (SDG&E) 230-kV transmission line and 120-foot easement (Figure 4.1-1). Western Land Boundary Monument # 252 is also located in the East Otay Mesa SPA along the International U.S./Mexico Border in Section 32. This boundary marker is constructed of masonry materials and is approximately six to eight feet in height (International Boundary and Water Commission 1992; Keyes 1993).

The auto storage yard is operated by the Robertson Leasing Corporation under a major use permit (P88-20) and is located at 7277 Otay Mesa Road. The major use permit establishes a five-year time limit on its use, which expires in mid-1993 (HGHB 1993). However, an application for a five-year extension of this permit is being prepared by the applicant at this time (Carroll 1993).

On the north side of Otay Mesa Road, in the vicinity of the storage yard, are five of the nine onsite dwelling units (Figure 4.1-1). Three of the remaining dwelling units are located at Kuebler Ranch in the northern part of the SPA while one additional dwelling unit is located on Lone Star Road in the western part of the SPA (Figure 4.1-1).

Historically, much of the flat portions of the site have been used for agricultural purposes; however, no agricultural activity was present during the site visit conducted in April 1993. Based on the County of San Diego's 1990 "Important Farmland Map," the project site is primarily comprised of Grazing Lands and Farmland of Local Importance (Figure 4.1-2). Farmland of Local Importance is defined as "Nonirrigated Prime and Statewide mapping units and cultivated farmlands" not covered by the categories Prime Farmland, Farmland of Statewide Importance or Unique Farmland and "of significant economic importance to the County" (County of San Diego 1990). As can be seen on Figure 4.1-2, the site also



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Existing Land Use in the Vicinity of " East Otay Mesa SPA

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SOURCE: County of San Diego Important Farmland Map 1990

Important Farmlands Within the East Otay Mesa SPA

FIGURE

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contains a small amount of Prime Farmland and Farmland of Statewide Importance Harvest and Otay Mesa roads and a larger amount of Farmland of Statewide Importance north of Otay Mesa Road and east of Harvest Road. According to the EIR prepared on the County's General Plan Amendment for the area (processed in 1983), the southern portions of the site (south of Otay Mesa Road) were historically used to grow grain crops while areas in the northern and western parts of the site were used to grow vegetable crops (County of San Diego 1982). There are no current Williamson Act contracts or County Agricultural Preserves located on the site.

Portions of the hillside areas of the East Otay Mesa SPA have been disturbed by off-road vehicle travel, target shooting, and illegal dumping. In spite of the disturbance, however, the hillside areas contain highly sensitive biological resources as discussed in Section 4.3.

Adjacent Land Use. The project site is currently surrounded by open space to the east and north, by the International U.S./Mexico Border and Tijuana, Mexico on the south, and by industrial and commercial land uses in the City of San Diego to the west (Figure 4.1-1). Specific development includes the East Mesa County Detention Facility, which is located just north of the East Otay Mesa SPA boundaries (within the CSA) on the mesa north of O'Neal Canyon and is accessed by an extension of Alta Road through the Specific Plan Area. The recently constructed and newly occupied facility is ultimately planned to house as many as 6,000 medium- and maximum-security inmates.

Northwest of the project site is the State of California's R.J. Donovan Correctional Facility. This facility is located on a mesa between Johnson and O'Neal canyons and is accessed off of Alta Road from within the Specific Plan Area. The correctional facility is a medium- to maximum-security facility that is designed to house 4,000 inmates and associated support services. The facility itself is approximately one-half mile from the nearest East Otay Mesa SPA boundary to the east and approximately one-quarter of a mile (about 1200 feet) from the nearest SPA boundary to the north (Figure 4.1-1).

Within the City of San Diego, industrial development is located immediately adjacent to the SPA's western boundary on the west side of Enrico Fermi Drive, on the north and south sides of Airway Drive, and on the south side of Otay Mesa Road. Most of this development is light industrial or research and development. Additional industrial and commercial development is located approximately one-half mile to the west at the East Otay Border Crossing.

Also located within the City of San Diego, approximately one-quarter mile from the SPA's most western boundary, is Brown Field, a general aviation airport owned and operated by the City of San Diego (Figure 4.1-1). A general aviation airport is defined by the Federal Aviation Administration (FAA) as an airport that boards less than 2,500 annual passengers and is used exclusively by business and private aircraft that do not provide common-carrier passenger service (P & D Technologies 1990). In addition to its role as a general aviation airport, Brown Field is a transport airport, meaning that it is designed to serve aircraft with approach speeds ranging from 121 to 165 knots, and a reliever airport, because one of its functions is to relieve congestion at Lindbergh Field (P & D Technologies 1990). Figure 4.1-3 shows existing land use at the airport. The airport consists of two parallel runways, one 7,999 feet long and 200 feet wide and one 3,032 feet long and 70 feet wide, associated airside and landside facilities, and approximately 51 commercial and nonprofit leases (P & D Technologies 1990).

On the Mexican side of the border, land along the border includes the Tijuana Rodriguez International Airport, located approximately one mile to the west, industrial development along the southwestern edge of the SPA, intensive residential development (El Escondido) along the southeastern edge of the SPA, and agricultural land in between the industrial and residential land uses.

### Land Use Designations and Zoning

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The East Otay Mesa SPA is located within the County's Otay Subregional Planning Area and is designated as (21) Specific Plan Area (with an allowable residential density of 0.034) and zoned as S-88 District - Specific Plan Use Regulations. The Otay Subregional Plan text specifies that the majority of the SPA is to be developed with industrial uses consistent with the County's (16) General Industrial classification land uses (County of San Diego 1990). It also specifies that residential land uses shall be allowed in the areas over 25 percent slope, which were previously designated (17) Estate and (18) Multiple Rural Residential (County of San Diego 1990). These areas as well as the areas to be developed as (16) General Industrial are shown on Figure 4.1-4. The line dividing the industrial areas of the project site from the residential areas of the site corresponds to the County's Current Urban Development Area (CUDA) classification and the Urban Limit Line. Other guidelines of the Otay Subregional Plan with respect to East Otay Mesa have

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been identified in the East Otay Mesa Specific Plan Policy Consistency Analysis completed for this project.

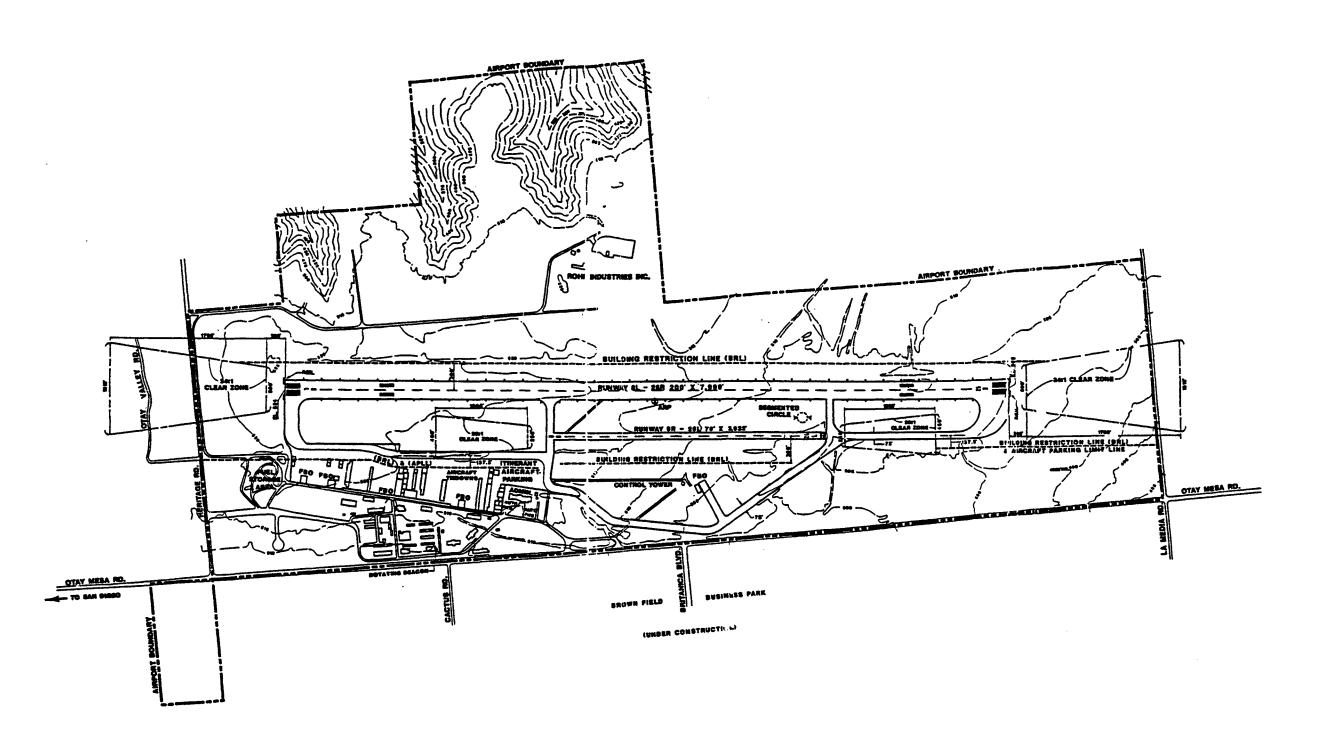
Several County overlay zones or designations also apply to the East Otay Mesa SPA. First, businesses locating in the East Otay Mesa SPA are subject to the County's Mandatory Recycling Ordinance in terms of storage, collection, recovery of marketable and recyclable material and disposal of solid waste. Second, the area is designated by the State of California as a Recycling Market Development Zone (RMDZ). The purpose of this zone is to develop the markets to process and consume recyclable material in the San Diego region. Remanufacturing and recycling businesses that decide to site within the San Diego RMDZ will be eligible for a variety of local and state incentives (County of San Diego, Department of Public Works 1992).

The County's Resource Protection Ordinance (RPO) would also be applicable to portions of the site, including the hillside areas due to the presence of steep slopes, sensitive biological resources and other potentially significant environmental resources. The RPO contains regulations designed to provide protection to the area's wetlands, floodplains, steep slopes, sensitive habitat areas, and historic and/or prehistoric sites.

Finally, adjacent County lands to the east and north of the East Otay Mesa SPA are located within the County Resource Conservation Areas (RCAs) (Figure 4.1-5). Section 2.7 of the County's Regional Land Use Element states the following with regard to RCAs (County of San Diego 1990a):

This overlay identifies lands requiring special attention in order to conserve resources in a manner best satisfying public and private objectives. The appropriate implementation actions will vary depending upon the conservation objectives of each resource but may include: public acquisition, establishment of open space easements, application of special land use controls such as cluster zoning, large lot zoning, scenic or natural resource preservation overlay zones, or incorporating special design considerations into subdivision maps or special use permits. ...

Within RCAs, county departments and other public agencies shall give careful consideration and special environmental analysis to all projects which they intend to carry out, propose, or approve, and shall select those conservation actions most appropriate to the project and consistent with the intent of this overlay designation.



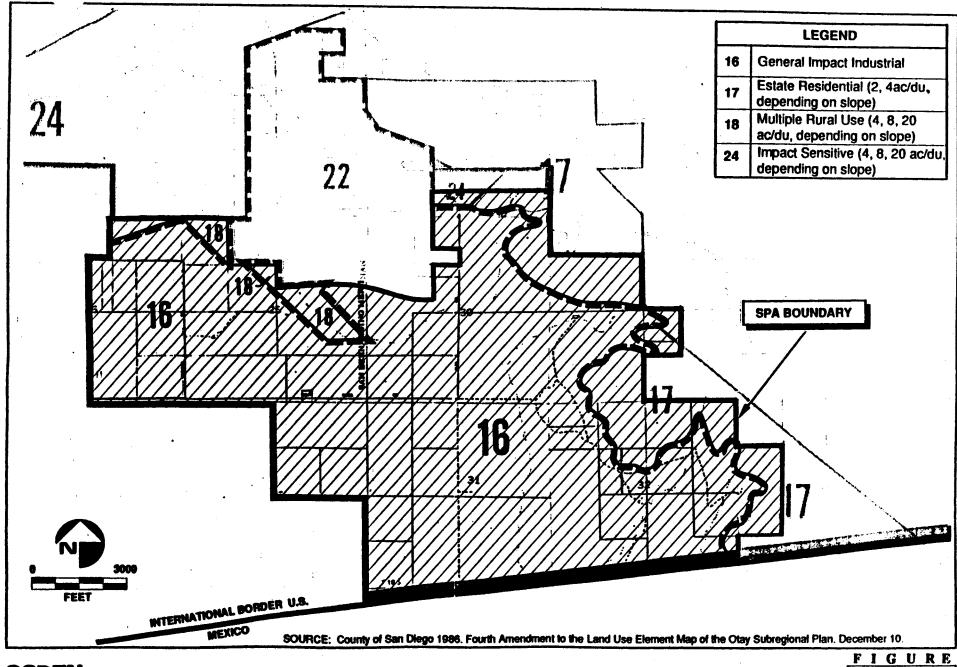
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SOURCE: Master Plan Update, Brown Field Municipal Airport, P & D Technologies, 1990.

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**Existing Brown Field Municipal Airport** 

FIGURE



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Underlying Land Use Designation for the East Otay Mesa SPA

County RCAs on, or adjacent, to the East Otay Mesa SPA are as follows (Figure 4.1-5):

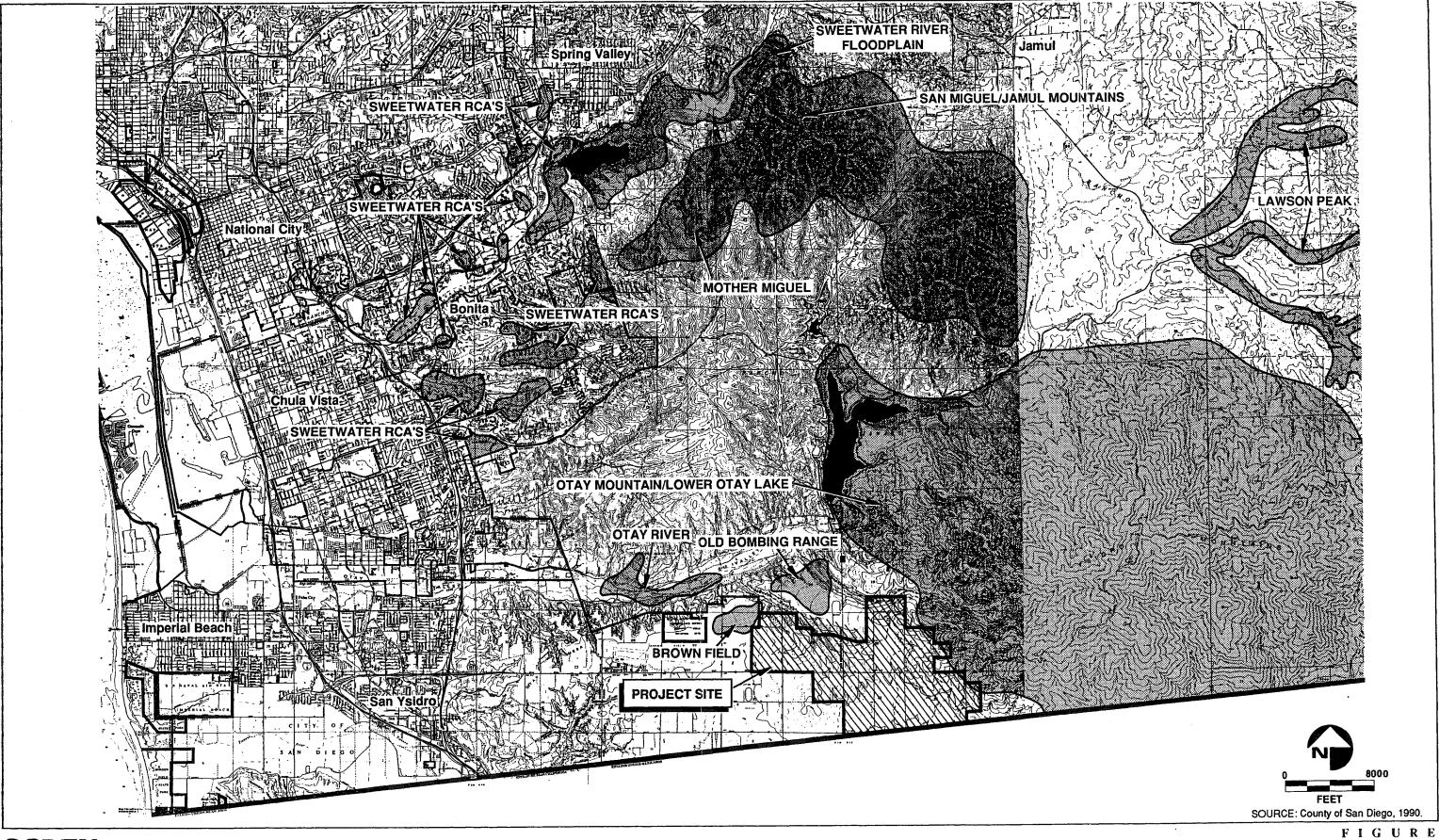
- RCA # 124 (Brown Field Area). Resources include vernal pools and rare plants.
- RCA # 125 (Brown Field Old Bombing Range). Resources include vernal pools and rare plants.
- RCA # 127 (Otay Mountain-Lower Otay Lake). Resources include scenic landmarks and rare plants. Otay Mountain is a famous landmark and is known for the world's largest stand of the rare Tecate cypress. The RCA contains all of the rare plants that occur on the Tecate Mountains as well as the threatened Otay manzanita, Dunn's Mariposa lily and San Miguel savory, the endangered Mexican fremontia, and the very rare Gander's pitcher sage which is found nowhere but on San Miguel Mountain (Otay Ranch FEIR 1992a). The RCA also contains habitat for the federally listed California gnatcatcher. Lower Otay Lake is considered a significant resource as well.

# Planned or Proposed Land Use

Onsite Planned or Proposed Land Use. Several projects have been approved, proposed or are under consideration for parts of the SPA (Figure 4.1-6). These projects include: an approved major use permit for a 426-acre American International Raceway; an 1,233-acre off-highway vehicle (OHV) park proposed by the State Department of Parks and Recreation; a 400- to 450-acre landfill under consideration by the County; an "alternatives technologies" composting site under consideration by the property owner; and a sewage sludge monofill for the Metro Clean Water Program under consideration by the City of San Diego. Major roadways proposed include the construction of State Route (SR) 125 as a tollway and SR-905 as a freeway.

Neither of the land uses already approved within the East Otay Mesa SPA, i.e., the American International Raceway or the OHV park, have been constructed. The Raceway Major Use Permit was approved by the County in 1987. Final Major Use Permit Modification language was approved by the County Board of Supervisors for the raceway in July 1992. The raceway project would include a facility for 70,000 spectators (assumed to be the demand for a premier three-day event) and an 800-vehicle overnight campground for recreation vehicles (Figure 4.1-7). The facility would be used daily, year-round for a variety of racing events and related activities such as driving school, automobile testing and law enforcement vehicle training. On-going employment is estimated to be approximately 50 persons with a peak staff of approximately 1,000 (Graves Engineering 1985a). The

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County of San Diego Resource Conservation Areas in the Vicinity of the Project Site

Future Land Use Planned or Under Consideration Within the East Otay Mesa SPA

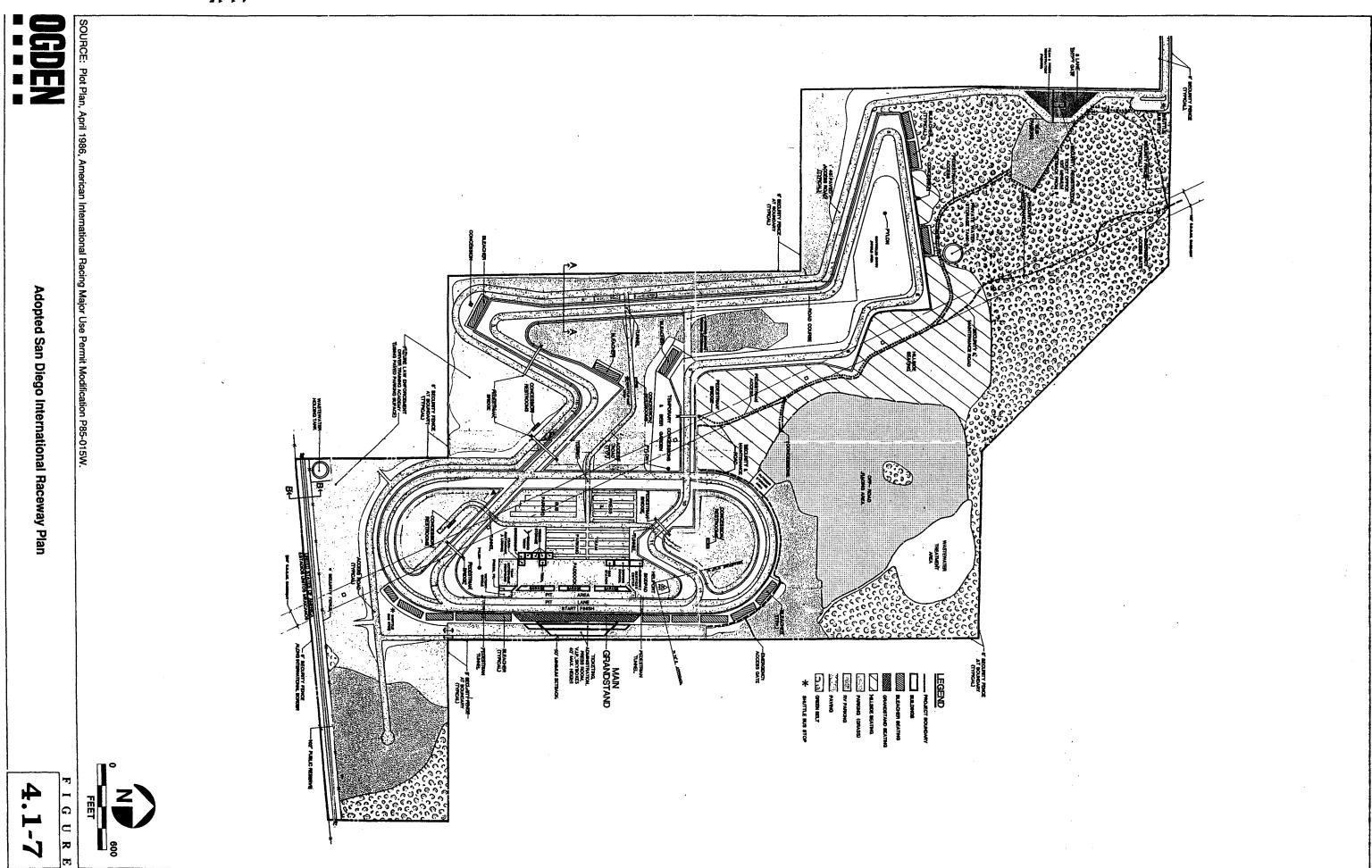
raceway would be operated under a 20-year conditional use permit (P85-015W), which expires in 2006.

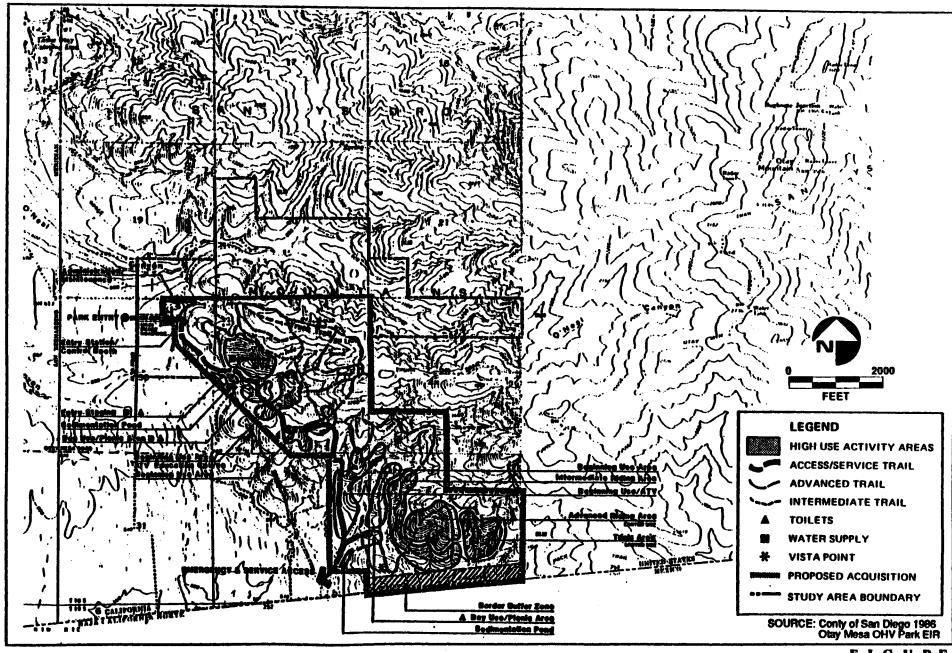
The OHV park's development plan was conceptually approved by the County in 1986 and an EIR was certified by the County and the State Parks Department. Final lease negotiations between the property owner and the State Parks Department are ongoing. However, final permit approval of the project in its current form is questionable due to the recently-established threatened status of the California gnatcatcher by the United States Fish and Wildlife Service. The OHV park site encompasses almost 1,300 acres although only part of the site is located within the East Otay Mesa SPA. The adopted OHV park plan would obtain access to the park from Alta Road and includes a staging area for pickups and off-road vehicles, a day use/picnic area that could be utilized by spectators during competitive motorcross events, and separate areas for beginning use and all-terrain vehicle education, a motorcross area and Advanced Riding Areas (Figure 4.1-8). Trails for advanced riders would also be provided throughout the steep slopes in the southeast of the site (this area is not within the East Otay Mesa SPA). The plan also includes sedimentation ponds along the western boundaries of the site on the major drainages (this area is within the East Otay Mesa SPA) as well as perimeter fencing and firebreaks in certain areas (WESTEC 1986).

The southeastern part of the East Otay Mesa SPA is also one of six sites under consideration by the County of San Diego within the southwestern County area as a potential new landfill site. The site would potentially involve approximately 450 acres, most of which are located within the East Otay Mesa SPA. The County is currently conducting constraints and feasibility analyses for all six landfill sites under consideration. When this analysis is complete, the County will decide which site (or sites) to pursue as proposed landfill sites and will prepare and certify a full EIR before proceeding with site acquisition and development. Potential site constraints at the proposed East Otay Mesa landfill site include sensitive biological resources such as the California gnatcatcher and vernal pools, and geotechnical and hydrological constraints.

Another potential project is a composting proposal for 500 tons/day on a 30-acre site in the northern part of the East Otay Mesa SPA just east of Alta Road and south of Kuebler Ranch (Andreu 1992; 1993). The proposal was originally one of eight proposals short-listed by the County (four incineration and four composting) for its "alternative technologies" program. The project has since been put on hold; however, a Final Request for Proposals

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Preferred Concept Plan for Proposed Otay Mesa OHV Park

FIGURE

is scheduled to be released in the summer (1993) with final project selection shortly thereafter (Andreu 1993).

The proposed sludge facility (officially called the Sludge and Biosolids Management Facility) is one of three sites being considered by the City of San Diego's Clean Water Program. The City is currently conducting preliminary site assessments to aid in its site selection process. A site is scheduled to be selected by the end of the summer (1993) as well as the completion of 30 percent design review of the facility (Himaka 1993). If the East Otay Mesa site is selected, facilities would include a 100-acre monofill designed to accept only biosolids (i.e., sewage sludge) as well as a truck storage and truck maintenance facility. The monofill would have a gas collection system and intermediate cap and would be designed to accept 10 million cubic yards over a 20-year planning horizon. However, since the purpose of the facility would be to accept sewage sludge from City Clean Water Program facilities only after all beneficial uses of the sludge have been exhausted, the 10 million cubic yards of fill may not be realized within the 20-year planning horizon (Himaka 1993). As is shown on Figure 4.1-6, the monofill itself would be located in the extreme eastern part of the East Otay Mesa SPA in Section 29. A larger 340-acre site acquisition area would extend outside of the SPA to the east.

State Route 125 is planned for construction from its present terminus at SR-94, south through the East Otay Mesa SPA to the Otay Mesa International Border Crossing. South of SR-54, SR-125 is proposed as a ten-lane tollway. Construction of the southern portion of a four-lane interim SR-125 (between SR-54 and SR-905) as a toll facility could commence as early as 1994/1995 and could be complete in 1998 (HGHB 1993). Several alignments for SR-125 are being evaluated by the California Department of Transportation (Caltrans).

State Route 905 is planned as an eight-lane freeway between Interstate 805 and SR-125/Harvest Road. A Project Study Report has been completed for this project; however, no funding is allocated for its construction in Caltrans' current State Transportation Improvement Program (HGHB 1993).

Planned Land Use in the Vicinity of the East Otay Mesa SPA. The East Otay Mesa SPA is bordered by City of San Diego lands on the west; the Otay River parcel of Otay Ranch on the north; County of San Diego and U.S. Department of the Interior, Bureau of Land Management (BLM) lands to the east; and the International U.S./Mexico Border to the south. A framework for land use within the City of San Diego is provided by the City's

Otay Mesa Community Plan (1981). In this plan, lands adjacent to the East Otay Mesa SPA are primary designated as Industrial. The City's Community Plan also designates lands within Johnson Canyon as Open Space; lands around the East Otay Border Crossing as Institutional; and lands on the south side of Otay Mesa Road at La Media Road as Commercial (City of San Diego 1981). Although not within City jurisdiction, the Otay Mesa Community Plan designates East Otay Mesa as "Future Growth" (City of San Diego 1981).

Brown Field is within the City's jurisdiction and has two applicable planning documents that will serve to govern its future growth. One is the existing Comprehensive Land Use Plan for Brown Field, prepared and adopted in 1981 by the San Diego Association of Governments (SANDAG), the County-appointed Airport Land Use Commission for the region. This planning document establishes the airport's Airport Influence Area, provides an Airport Noise/Land Use Compatibility matrix, and determines the facility's flight activity zones. In 1989, SANDAG revised the Brown Field Comprehensive Land Use Plan to include updated noise contours and Airport Influence Area and a revised Airport Noise/ Land Use Compatibility matrix (City of San Diego 1989). The Brown Field Airport Influence Area is based primarily on the 60 CNEL (community noise equivalent level) noise contour and extends onto the East Otay Mesa SPA as far east as Harvest Road and as far north as Lone Star Road (Figure 4.8-3) (City of San Diego 1989). According to the revised Airport Noise/Land Use Compatibility matrix, industrial and commercial land uses are compatible with up to 70 dB DNL (day night average sound level) as long as such uses located within the 65-70 dB DNL contours have interior noise levels that do not exceed 50 dB DNL (City of San Diego 1989). However, the matrix indicates that residential land uses are incompatible with noise levels above 65 CNEL and only compatible with levels above 60 CNEL if interior noise levels will not exceed 45 dB DNL.

The second document applicable to Brown Field is the Airport Master Plan Update prepared for Brown Field in 1990. This document provides a plan to remedy certain deficiencies in the existing airport's navigational aids (i.e., the need to provide a precision instrument approach procedure from the east) and to accommodate future projected demand for the airport. Key features of the new plan are the provision of a new runway to allow for improved instrument approach from the east; the expansion of fixed base operations to accommodate 9.5 acres for itinerant aircraft parking and 20 acres for aircraft T-hangars and/or tie downs; and the development (and subsequent lease) of approximately 80 acres of non-aviation industrial and commercial areas (P & D Technologies 1990).

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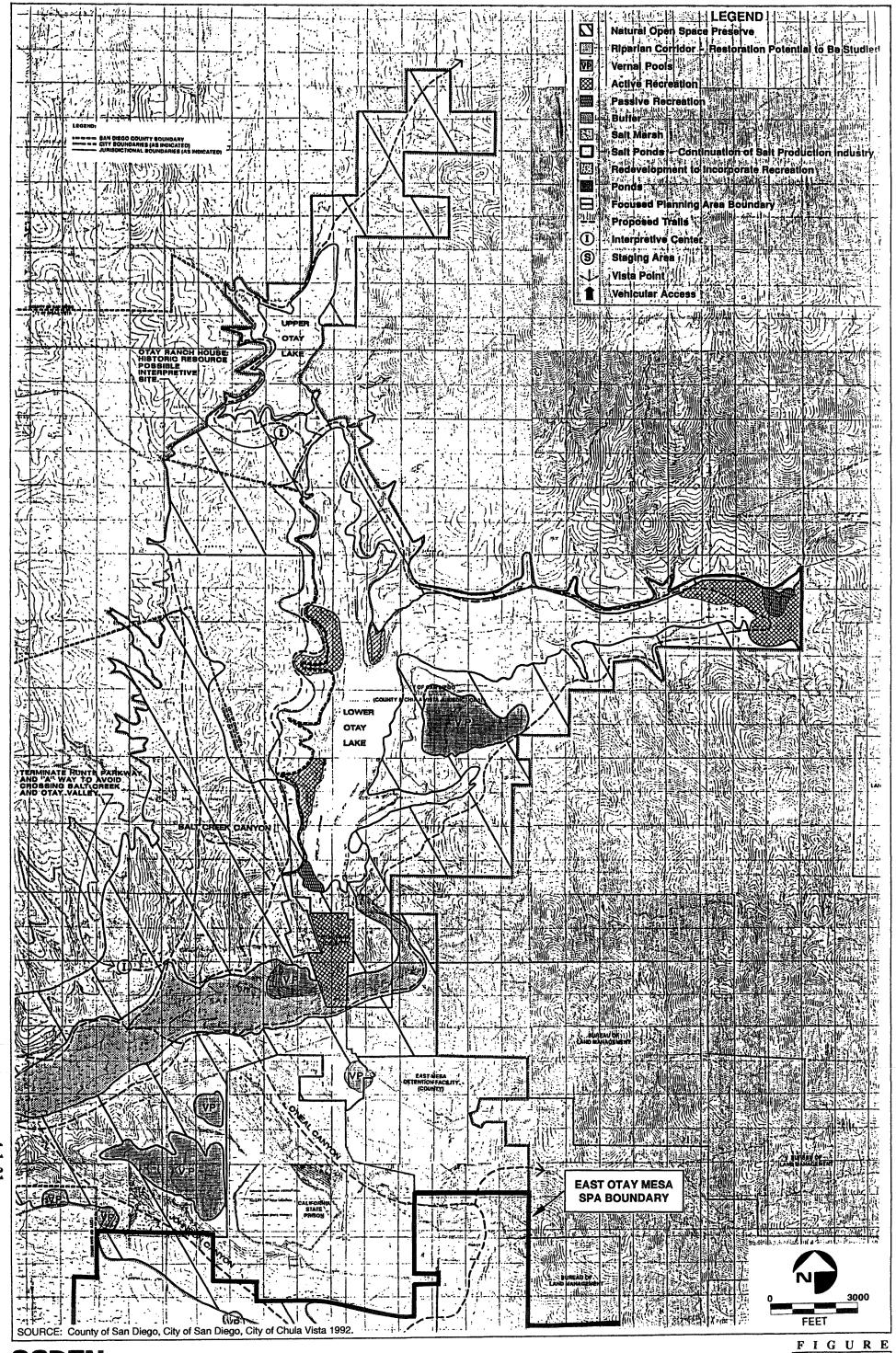
To the north of the East Otay Mesa SPA is land within the Otay River Valley that is proposed to become the Otay Valley Regional Park and land on each side of the river valley that is proposed for urban, mixed-use development as part of Otay Ranch. On the south side of the river valley, just north of Lone Star Road and the East Otay Mesa SPA boundary, the proposed Otay Ranch General Development Plan/Subregional Plan (GDP/SRP) land use maps designate the land as Industrial in accordance with the City of San Diego's industrial regulations. Land within the river valley is designated as Open Space in anticipation of the Otay Valley Regional Park.

The proposed Otay Valley Regional Park is currently in the planning process and is the subject of a Joint Exercise of Power Agreement (JEPA) between the cities of San Diego and Chula Vista and the County of San Diego. The JEPA intends to acquire property and develop the Otay River Valley as a regional park. To that end, a Focused Planning Area has been defined for the park and a preliminary Progress Plan map has been developed in conjunction with the National Parks Service (Figure 4.1-9). The primary features of the Progress Plan map include a natural open space preserve and riparian corridor in the eastern part of the valley near Lower Otay Lake and in Salt Creek and Johnson Canyon. No definitions for these land uses have been developed at this time (Greenstein, 1993). Park development planned for Johnson Canyon extends into the East Otay Mesa SPA in a Hillside Residential district of the proposed East Otay Mesa Specific Plan. West of the future extension of SR-125, the park's Progress Plan map includes active recreational areas. Trails located in Johnson and O'Neal canyons are also incorporated into the plan map. (The County's proposed Regional Corridor Trails Map also includes a trail in O'Neal Canyon; see Section 4.11.4, Parks and Recreation of this EIR.)

To the east of the East Otay Mesa SPA is private land under the County's jurisdiction and public lands that are managed by the BLM. The County lands are part of the Otay Subregional Planning Area and are designated as (17) Estate Residential, which allows for minor agricultural and low density residential uses on parcels of two or four acres, depending on slope (County of San Diego 1990b). On the County's Regional Land Use map, these lands are designated as Rural Development Area or as Environmentally Constrained Area, and are located outside of the County's Urban Limit Line.

The BLM lands are part of two wilderness study areas (WSAs) known as the Western Otay Mountain WSA and the Southern Otay Mountain WSA. The WSA designation is given to

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**Otay Valley Regional Park** Preliminary Progress Plan (Eastern half only)

lands meeting established criteria, i.e., undeveloped land areas in excess of 5,000 acres that have unique or sensitive habitat (P. Kempenich 1991). The area east of the East Otay Mesa SPA is also part of the Otay Mountain National Cooperative Land and Wildlife Area, a designation that was established through a Public Land Order and that requires the joint management of the area by the BLM and the California Department of Fish and Game (BLM 1992).

The Western and Southern Otay Mountain WSAs are a part of the BLM's South Coast Resource Area. The South Coast Proposed Resource Management Plan (RMP) and Final Environmental Impact Statement was released in November 1992. The proposed alternative (Alternative 3) includes the establishment of a "Border Mountains" special recreation management area (SMRA) to provide opportunities for "hiking, backpacking, equestrian use, camping, picnicking, nature study, hunting and motorized vehicle use, including OHVs on existing routes" (BLM 1992). The Border Mountains are described as the "corridor of land from the Otay Mountain vicinity on the west to the Campo vicinity of the east" (BLM 1992). This could include the BLM lands directly east of the East Otay Mesa SPA. The South Coast Proposed RMP calls for the BLM to prepare an activity plan for the Border Mountains SRMA.

To the south of the East Otay Mesa SPA is Tijuana, Mexico. In 1983, the United States and Mexico signed the La Paz Agreement (also known as the Border Agreement). This agreement outlined procedures for establishing technical "annexes" under which specific border projects are to be carried out. To date, five such annexes have been developed as listed below:

- Annex I: Provides for the construction and operation of Tijuana/San Diego wastewater treatment facilities.
- Annex II: Authorizes the establishment of the Inland Joint Response Team (JRT) to respond to accidental spills of oils and hazardous substances in the border area.
- Annex III: Establishes procedures governing the transboundary shipment of hazardous wastes and hazardous substances.

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- Annex IV: Requires copper smelters in the border area to comply with certain emissions limits.
- Annex V: Provides for an assessment of the causes of, and solutions to air quality problems in sister cities in the border area.

In response to these annexes, the U.S. Environmental Protection Agency (EPA) and the Mexican Secretaria de Desarrollo Urbano y Ecologia (SEDUE) have jointly prepared the Integrated Environmental Plan for the Mexico-U.S. Border Area (1992), which is considered to be a "First Stage" planning effort (1992-1994). More long-term goals for the area have not been formalized as yet. The objectives of the "First Phase" plan are as follows (EPA and SEDUE 1992):

- To strengthen enforcement of existing laws;
- To reduce pollution through new initiatives;
- To increase cooperative planning, training, and education; and
- To improve understanding of the border environment.

Issue areas addressed by the plan include air, soils, water quality and hazardous waste.

A final potential project in the vicinity of East Otay Mesa is a proposal to develop a major bi-national airport between Tijuana's Rodriguez Field and the City of San Diego's Brown Field. This project, also known as the Twinports concept, has been the subject of two siting studies by SANDAG, which identified Otay Mesa as the preferred site for a new San Diego County regional airport. No further action to site such as facility has been undertaken; however, the City of San Diego has instituted a moratorium on further residential development of Otay Mesa pending a determination on the Twinports project (City of San Diego 1991). This moratorium was extended by the City Council for an additional year on May 25, 1993.

# 4.1.2 Impacts

Implementation of the East Otay Mesa SPA would ultimately replace the undeveloped areas present in the SPA with industrial, residential and supporting commercial land uses. Ultimate buildout under the East Otay Mesa Specific Plan would include over 2,359 acres of industrial development, over 154 acres of commercial development, a maximum of

37 dwelling units, a fire station, a Sheriff's station, and a trolley station. Assuming floor-to-area ratios (FARs) of 0.4 for industrial areas and 0.25 for the commercial areas, a total of 32,890,239 square feet of industrial development, 1,129,337 square feet of regional commercial development, and 212,486 square feet of district commercial development could be constructed in the SPA. The street system in Otay Mesa would also be expanded as part of Specific Plan implementation, including two freeways (SR-905 and SR-125).

Allowable land uses in each area of the SPA are detailed in the East Otay Mesa Specific Plan. In the General Industrial district (S88-EOM1), permitted uses include: civic uses such as ambulance, fire protection, postal and parking services, and minor impact utilities; commercial uses such as agricultural and horticultural sales, automotive and equipment storage, repair and sales, and wholesale storage and distribution; custom manufacturing and general industrial uses; and agricultural uses. Other types of land uses allowed within the General Industrial district, subject to a minor or major use permit, include: child care and small schools (minor use permit); major impact services and utilities (major use permit); animal stock yards or animal waste processing (major use permit); and spectator sports and entertainment (major use permit).

# Impacts Related to Existing Land Use

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Impacts of SPA buildout in relationship to existing land uses could include the following: land use compatibility impacts between the existing residential units and the proposed industrial and commercial development; land use compatibility impacts between proposed residential units in Johnson Canyon and the adjacent State prison; land use compatibility impacts between proposed residential units in O'Neal Canyon and the adjacent County detention facility; and impacts to the Western Land Boundary Monument # 252 and the International U.S./Mexico Border. A loss of important farmlands, including prime farmland, farmland of statewide importance and farmland of local importance, would also occur. Each of these potential impacts are discussed in the following subsections.

No impacts are expected to occur from the interface of East Otay Mesa SPA development with adjacent City of San Diego industrial development, with Brown Field, or with development across the International U.S./Mexico Border. The SPA would allow industrial or commercial development in the vicinity of these adjacent land uses. Since this is similar to the development in the City, at Brown Field, and in Mexico, no land use compatibility impacts would occur. The part of the SPA located within the Brown Field

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Airport Influence Area (Figure 4.8-3) is compatible from a land use/noise perspective as long as interior noise levels do not exceed 50 dB DNL. This issue is addressed in Section 4.8, Noise of this EIR.

Impacts to Existing Residences. There are nine dwelling units present on the site; seven of these units appear to be occupied while two are unoccupied historic structures associated with Kuebler Ranch (see Section 4.4, Cultural Resources of this EIR). The occupied dwelling unit at Kuebler Ranch and the five dwelling units on Otay Mesa Road would be located within industrial areas of the SPA. The dwelling unit located on Lone Star Road would be located within the regional commercial area planned for the SPA.

It is likely that these existing residential land uses will be eventually displaced by the planned industrial growth as individual property owners choose to redevelop or sell their property. However, since development of the SPA will be phased with provision of the necessary services and infrastructure over a 20- to 25-year time frame (expected to build out by the year 2020), these residential land uses may be adversely impacted by nearby industrial development for some time before they are actually displaced. In the worst-case, one or more of the units may not be removed and would be permanently impacted by surrounding industrial or commercial development.

Typical impacts of industrial or commercial development on residential development are lighting and noise impacts as well as a loss of privacy. In East Otay Mesa, the loss of open space could also be significant and adverse to existing residents since the area has been historically undeveloped or used for agriculture. Other potential impacts could include the exposure of residents to industrial pollution or risks associated with hazardous materials. Odors may also be an impact of certain types of industrial development. All of these impacts could be potentially significant in the East Otay Mesa SPA (due to the wide range of industrial uses that may be developed) if existing residential land uses remain after the SPA begins to develop with industrial and commercial land uses.

Impacts to Future Residences from the State Prison and the County Detention Facility. An area approximately 109 acres in size on the south side of Johnson Canyon would be proposed by the East Otay Mesa SPA as its Hillside Residential district. Only 5 dwelling units could be developed there due to the density limitations of one dwelling unit per 20 acres. However, these 5 units, if constructed would be located just across the canyon from the existing State prison. In the extreme northern part of the East Otay Mesa SPA in

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proximity to O'Neal Canyon, additional lands are designated by the SPA as its Hillside Residential district. Any dwelling units developed in this area would be located in proximity to both the State prison and the County detention facility. Potentially significant adverse land use incompatibilities would occur between these residential and institutional land uses due to lighting from the State prison (and the County jail once occupied by inmates).

Impacts to Western Land Boundary Monument # 252 and the International U.S./Mexico Border. The East Otay Mesa SPA does not reference Boundary Monument # 252 nor does it make any provisions to address an International Boundary and Water Commission request to maintain the permanence and visibility of the monument and to provide access to the monument. Industrial development would be allowed along the border and the SPA does not mention any type of buffer between the two land uses. The International Boundary and Water Commission is under Federal mandate to protect the visibility between and access to the boundary monuments for maintenance purposes (International Boundary and Water Commission 1992). Obstructions to the boundary monuments would affect the Commission's ability to maintain the monuments. The International Boundary and Water Commission has also requested that no work or development be permitted within 60 feet of the border to allow room for drainage improvements that may be necessary to prevent stormwater runoff from entering Mexico (Keyes 1993). Where such drainage improvements are not necessary the Commission has requested that fences not be allowed closer than 5 feet of the border (International Boundary and Water Commission 1992). The Commission also requested that no waste or roadway construction materials be permitted to be piled in the areas near the international boundary (International Boundary and Water Commission 1992). Since these precautionary measures have not been committed to by the Specific Plan, impacts to the boundary monument are potentially significant.

The U.S. Border Patrol has requested that a 150-foot buffer be included between the nearest buildings and the border and that north/south access roads to the border be constructed at a minimum of every one-half mile (Shumate 1993). The purpose of the buffer would be to allow border patrol agents to observe and work any alien traffic before such individuals are in the building compounds and to allow for ready access by emergency vehicles or aerial evacuation of injured agents or other individuals (Shumate 1993).

According to the Border Patrol, an average of 50 vehicles per month that are involved in smuggling activities in, and around, the Otay Mesa Port of Entry are seized by the Border

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Patrol (Shumate 1993). County staff has had discussions with the Border Patrol staff and developed Policy C-4 in the Specific Plan as a result. Policy C-4 requires that property owners reserve right-of-way, improve roadway and provide reciprocal easements along the border. Property owners are required to reserve a 30-foot right-of-way joint access roadway to accommodate a 20-foot roadway along the Mexico border for Border Patrol activities as well as emergency vehicle access. Because the Specific Plan requires property owners to provide a buffer along the border specifically for Border Patrol activities, the impact to the U.S. Border Patrol is not considered a significant impact.

Impacts to Important Farmlands. Although previous County general plan amendments have removed the former agricultural zoning and land use designations over the East Otay Mesa SPA, the area has continued to be farmed as an interim use (although no farming activity was noted during a recent field visit). In addition, some of the soils within the SPA are considered to be important farmlands by the County (Figure 4.1-2). As can be seen on Figure 4.1-2, ultimate development of the SPA with industrial and commercial uses would result in a loss of a few acres of Prime Farmland, a small area of Farmland of Statewide Importance, and large areas of Farmland of Local Importance. Grazing lands would also be lost. The East Otay Mesa Specific Plan does allow agriculture as a continuing interim use. Because the amount of important farmland that would be lost at ultimate buildout of the SPA is relatively small, the loss of these agricultural resources is not considered a significant impact.

### Land Use Designations and Zoning

The proposed East Otay Mesa Specific Plan is consistent with the land use designations and zoning present on the site since it would provide the required industrial and residential land uses. However, it does not adequately provide for each specific guideline set forth in the Otay Subregional Plan for the SPA. These guidelines have been analyzed individually in the East Otay Mesa Specific Plan Policy Consistency Analysis, which is available for review at the County of San Diego, Department Planning and Land Use. In general, the Specific Plan does not adequately address guidelines to protect residential uses from polluting industries, to offer low and moderate income housing within or convenient to the project area boundary, to address specific public service needs through the preparation of public service Master Plans, to provide for library and animal control facilities, and to ensure the preservation of sensitive environmental resources.

The Specific Plan attempts to address some of these issues through the application of two existing County overlay zones: the "B" Designator and the "G" Designator. The "B" Designator overlay zone would apply Community Design Review Area regulations over all of the SPA. This community design review could be used to prevent polluting industries from adversely affecting residential areas. However, there is no guarantee that such a review would, in fact, accomplish this objective.

The "G" Designator overlay zone would apply Sensitive Resource Area regulations to portions of the SPA as shown in Figure 3-4 (in the Project Description). These regulations restrict development impacts on wetlands, floodways and the floodway fringe, steep slope lands, sensitive habitat lands, and significant prehistoric and historic sites. However, the regulations focus on preventing disturbance of sensitive resources by restricting development at the time that a site plan is proposed rather than when the Specific Plan is established.

In contrast, the Otay Subregional Plan focuses on preserving environmentally sensitive resources through requiring the establishment of a comprehensive open space network that includes the preservation of riparian and high-quality mesic habitat, wildlife corridors, vernal pools, and natural open space vegetation. The Otay Subregional Plan also calls for implementation of the Vernal Pool Preservation Plan. In addition, the concept of a comprehensive open space network is important to meeting the intent of the Conservation Element for the RCAs on, or near, the SPA. The East Otay Mesa Specific Plan does not adequately address these issues or guarantee that they will be implemented as part of the Specific Plan. This is a potentially significant inconsistency with the Otay Subregional Plan as well as with similar goals set forth in the County's Regional Land Use and Conservation elements.

Consistency with other goals and guidelines of the County regarding the provision of affordable housing convenient to the project area and the provision of timely facilities and services are addressed in Section 4.12, Population/Housing/Employment, and Section 4.11, Public Services and Utilities of this EIR, respectively.

# Impacts to Planned or Proposed Land Use

Most of the land uses planned or under consideration for the East Otay Mesa SPA (with the exception of the Otay Valley Regional Park and the BLM wilderness areas) would be

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allowed within the East Otay Mesa industrial area as an interim use or with a Major or Conditional Use Permit or are otherwise compatible with the East Otay Mesa industrial area (i.e., buildout of the City of San Diego Otay Mesa Community Plan, the Brown Field expansion and projects considered by the Border Plan). Most of these planned or proposed land uses would not, however, be compatible with proposed residential use of the SPA.

The subsections below focus on the following issues: land use compatibility impacts between proposed residential uses and the American International Raceway; land use compatibility impacts between proposed residential uses and the OHV park; land use compatibility impacts between proposed residential uses and the potential landfill, monofill and composting projects; impacts related to the Brown Field expansion; impacts related to the Otay Valley Regional Park; and impacts related to BLM plans for east of the SPA.

Impacts to Future Residents from the Planned American International Raceway. The East Otay Mesa SPA specifically allows spectator sports as an interim use on industrial and commercial lands. However, approximately one-half of the raceway site is located within the SPA's Hillside Residential district (Figure 4.1-6). The remainder of the raceway site, including the primary raceway track, is located immediately adjacent to the SPA's residential area. The primary impacts to residences located in the vicinity of the raceway would be noise, dust, and lighting impacts. These impacts are all indicative of significant land use incompatibilities between the planned raceway and future residences in the SPA's Hillside Residential district. Section 4.8 discusses the noise impacts in more detail.

Impacts to Future Residents from the Planned OHV Park. The planned OHV park would be located in the SPA's Hillside Residential district and outside of the SPA to the east (Figure 4.1-6). Therefore, if the park is constructed, future residential development in the area would be precluded for the life of the park. Any residential development located adjacent to the park boundaries could be significantly affected by noise and dust.

Impacts to Future Residents from Potential Waste Management Projects. The County landfill and the City monofill are under consideration for the SPA's Hillside Residential district (Figure 4.1-6). Therefore, if these facilities are constructed, future residential development on the actual landfill or monofill sites would be precluded. Residential development in the vicinity of the facilities could be adversely affected by visual impacts, noise, dust and odors throughout the life of each project. These potential impacts will be addressed in future EIRs on the two projects. In the case of the monofill, if other City

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programs involving beneficial re-use of sewage sludge are successful, the facility may be open far beyond the current 20-year planning horizon. The significance of the potential land use impacts would depend primarily on the proximity of residences to the landfill or monofill.

The composting site would be located primarily within the SPA's industrial area (Figure 4.1-6). However, the SPA's Hillside Residential district would be located adjacent to the site to the east. Potential impacts to future residences could include noise, lighting and odors, and may be significant depending on the proximity of future residences to the site and the design of the facility.

Impacts Related to the Proposed Brown Field Expansion. If Brown Field is expanded to include a new runway, the airport's 60 CNEL contour would extend into the Hillside Residential district of the East Otay Mesa SPA. Potential impacts to future residences in the Hillside Residential district would be significant.

Impacts Related to the Otay Valley Regional Park. Implementation of the East Otay Mesa Specific Plan would affect plans for the Otay Valley Regional Park in two ways. First, future industrial and residential development allowed by the SPA in, and on the south side of, Johnson Canyon could preclude the preservation of the canyon as a Natural Open Space Preserve as proposed by the Otay Valley Regional Park Progress Plan map. This is a significant adverse impact of the proposed SPA on the Otay Valley Regional Park's plans.

Second, the East Otay Mesa Specific Plan provides an opportunity to implement trails proposed by the Otay Valley Regional Park through Johnson and O'Neal canyons. The Specific Plan for East Otay Mesa includes these trails on its Open Space Plan (Figure 3-5). This is a positive effect of the project on the Otay Valley Regional Park and is consistent with the Park's goals to provide a continuous trail system for hiking, biking and equestrian use from San Diego Bay to BLM lands and the Pacific Crest Trail (JEPA 1990).

Impacts Related to BLM Plans for East of the SPA. BLM lands to the east of the East Otay Mesa SPA are buffered from the SPA by approximately one-quarter mile of undeveloped lands at the closest point. Industrial areas of the SPA are separated from the BLM-managed open space even further due to the Hillside Residential areas of the SPA along the SPA's eastern boundary. The topography in this intervening area is steep and rugged.

Due to the presence of this natural buffer, no impacts to BLM lands or goals for its land are anticipated to occur as a result of the East Otay Mesa SPA.

Impacts Related to the Twinports Concept. Because of uncertainties about a bi-national airport (or a new San Diego County regional airport) at this time, the planning work for East Otay Mesa has proceeded under the assumption that there would not be such a project in Otay Mesa. If such an airport is to be developed, the timing of transportation facilities may need to be accelerated and detailed noise evaluations (among other issues) would be required. The California Environmental Quality Act (CEQA) Guidelines, Section 15145, provides for the termination of discussion on impacts "too speculative for evaluation." Because no specifics are available on the Twinports concept, and it is not a formal proposed project at this time, impacts cannot be evaluated.

### Impacts as a Result of Onsite Interface between Residential and Industrial Areas

The development of residential land uses in proximity to industrial land uses within the SPA itself could result in significant land use incompatibilities in addition to the specific existing, planned or proposed land uses discussed above. As discussed previously in relation to existing onsite residences, typical impacts of industrial or commercial development on residential development include lighting, noise, a loss of privacy, exposure of residents to industrial pollution or risks associated with hazardous materials, and odors. All of these impacts could be potentially significant in the East Otay Mesa SPA (due to the wide range of industrial uses that may be developed) if residential land uses are located in proximity to industrial and commercial land uses as allowed by the SPA. However, due to the low density of the Hillside Residential areas, opportunities would exist to locate future residential development away from industrial areas.

# 4.1.3 Level of Significance

The implementation and eventual buildout of the East Otay Mesa Specific Plan would have the following potentially significant land use impacts:

Land use interface impacts between existing or future residences and the State
 <u>prison</u>, the <u>County detention facility</u>, <u>onsite industrial development</u>, the
 American International Raceway, and the OHV park (if developed according to
 its current plan);

- Impacts to Western Land Boundary Monument # 252 along the International U.S./Mexico border due to the lack of a buffer around the monument;
- Inconsistencies with the Otay Subregional Plan guidelines for the East Otay Mesa SPA, with applicable goals of the County's Regional Land Use Element, and with RCAs identified in the area by the County's Conservation Element;
- Incompatibility between the future 60 CNEL noise contour of Brown Field with the proposed Hillside Residential district north of Lone Star Road; and
- Inconsistencies with goals and preliminary plans for the Otay Valley Regional Park for the area on, and around, Johnson Canyon.

All of the above impacts could be mitigated below a level of significance.

The following land use incompatibilities could also be adverse if projects under consideration for the area are implemented.

• Land use interface impacts between future residences and the County landfill project, the City monofill project, and the "alternative technologies" composting project.

However, since these projects are only under consideration and are not proposed or approved at this time, potential impacts are not considered to be significant impacts of the East Otay Mesa Specific Plan. If the East Otay Mesa Specific Plan is adopted, additional analysis of potential impacts and the mitigation of those impacts would be the responsibility of the individual projects being proposed under separate CEQA compliance.

### 4.1.4 Mitigation Measures

1. Mitigation for interface impacts between residential and non-residential land uses are varied and greatly dependent upon individual site plans. However, the following general mitigation measures shall be required of any industrial or

commercial development constructed adjacent to residential development within the SPA:

- A 25-foot landscaped buffer shall be provided along any common site boundaries between an industrial or commercial development and a residence.
   The landscaping shall provide enough vegetative screening so as to maintain the residence's privacy.
- Adherence to noise mitigation required in Section 4.8 Noise of this EIR.
- Any industrial development locating adjacent to residences shall submit a
   Hazardous Materials and Management Plan, to the County's Hazardous
   Materials Management Section of the Environmental Health Division to ensure
   that no risks will occur to the residents.
- 2. To further mitigate potential impacts to the Hillside Residential areas of the SPA, a Site Plan shall be required for the Hillside Residential areas prior to the approval of any residential units. The Site Plan shall evaluate land use compatibility impacts in detail and propose detailed mitigation to alleviate such impacts.
- 3. To mitigate lighting impacts from the State prison and the County detention facility on future residences in proximity to these existing land uses, the Site Plan for the Hillside Residential area shall demonstrate that light sources from these land uses do not face the proposed homesites.
- 4. To mitigate potential impacts of the raceway and OHV park on future residences in the Hillside Residential district of the SPA, a site-specific noise analysis will be required that demonstrates that appropriate raceway and OHV park noise impact mitigation measures are included in the design of the residential projects.
- 5. To mitigate potential impacts to the Western Land Boundary Monument # 252 a site distance of one foot shall be maintained between the boundary monument # 252 and adjacent boundary monuments and access to the boundary monument shall be provided via a written agreement between the International Boundary and Water Commission and the property owner of the parcel which contains the boundary monument. Specific site drawings, cross-sections, or profiles for any proposed

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- development within 60 feet of the border shall be provided to the International Boundary and Water Commission for review and comment.
- 6. To mitigate policy inconsistencies with applicable County plans and policies, the East Otay Mesa Specific Plan shall be revised to include:
  - A comprehensive open space system that includes, but is not limited to, the
    preservation of riparian and high-quality mesic habitat, wildlife corridors,
    vernal pools, and natural open space vegetation. County RCAs shall be
    referenced and measures to protect these specific areas shall be included as an
    objective of the open space system. The Specific Plan shall also incorporate
    applicable portions of the Vernal Pool Preservation Plan. See Section 4.3,
    Biological Resources of this EIR for additional information on the sensitive
    resources.
- 7. To mitigate potential noise impacts to new residences from Brown Field, residential development shall be avoided within the projected 60 CNEL noise contour for Brown Field unless impacts can be mitigated as specified in Section 4.8, Noise of this EIR.
- 8. To mitigate inconsistencies with proposed land use in Johnson Canyon between the East Otay Mesa Specific Plan and the Otay Valley Regional Park Progress Plan map, the County shall re-evaluate each proposed plan and come to an agreement on which type of land use is the most appropriate for the canyon, i.e., Hillside Residential and Industrial development as proposed by the East Otay Mesa Specific Plan or Natural Open Space Preserve as proposed by the park's Progress Plan map. The two plans shall then be revised, as needed, to provide for consistent land use designations between the two proposed land use maps.

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### 4.2 LANDFORM ALTERATION/VISUAL QUALITY

# 4.2.1 Existing Conditions

#### SPA Characteristics

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The East Otay Mesa SPA is comprised of the most easterly portion of Otay Mesa, the foothills of the San Ysidro Mountains, and upper portions of Johnson and O'Neal canyons. Otay Mesa is one of a series of the marine wave-cut terraces that are prevalent throughout the San Diego region and ranges in elevation from approximately 450 feet mean sea level (MSL) to over 600 feet MSL. The western two-thirds of Otay Mesa is essentially a flat elevated area bounded by steep cliffs on its northern side; the eastern one-third of the mesa (where the East Otay Mesa SPA is located) is characterized by low, gently rolling hills that increase in elevation as they transition to the foothills of the San Ysidro Mountains (Figure 4.2-1). Otay Mesa is bounded on the north by the Otay River Valley and on the east by the San Ysidro Mountains.

The East Otay Mesa SPA itself ranges in elevation from approximately 400 feet MSL in the bottom of Johnson and O'Neal canyons to over 1,200 feet MSL in the vicinity of Otay Mountain along the SPA's eastern boundary. Steep slopes (with gradients over 25 percent) are present in the eastern part of the SPA in the San Ysidro foothills as well as in the northern parts of the SPA in Johnson and O'Neal canyons (Figure 4.2-2). The SPA drains in three directions: the southern and southeastern portions drain to the south; the northern portion drains to the north; and the most westerly portion of the SPA drains to the west.

There are two dominant landforms in the area from a visual standpoint: the San Ysidro Mountains and the Otay River Valley. From anywhere within the project site, the San Ysidro Mountains are easily visible and form the backdrop for any development that might occur in the eastern part of the mesa (Figure 4.2-3). The Otay River Valley (and its tributary canyons, Johnson and O'Neal) are visible primarily from the higher hillside portions of the eastern part of the SPA and from areas along the SPA's northern boundary. Figure 4.2-4 is a photograph of Johnson Canyon from the northwestern part of the SPA. (Figure 4.2-6 provides a photo location map for the photographs.)

The project site itself is characterized primarily by undeveloped open space and is vegetated with grasses on the flatter portions of the SPA and with grasses and coastal sage scrub on

Topography and Surrounding Landforms of the East Otay Mesa SPA

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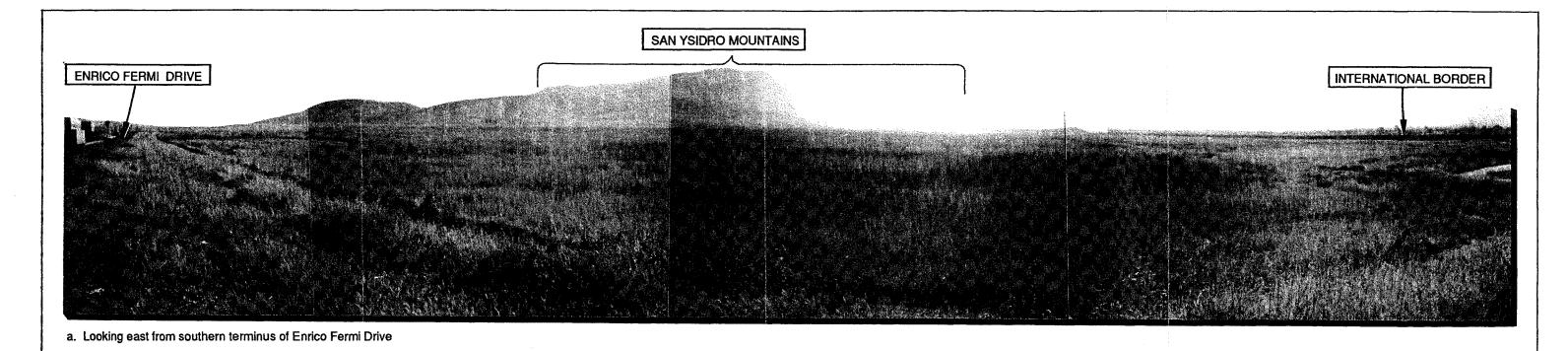
4.2-3

the steeper slopes. Short-range views of the project site are currently provided from perimeter roads such as Airway Road and Enrico Fermi Drive (Figure 4.2-3) and from onsite roads such as Lone Star, Harvest, Otay Mesa and Alta roads. Short-range viewers include: employees and visitors of industrial development located in the City of San Diego adjacent to the SPA's western boundary; employees and visitors of the State prison and the County detention facility; employees or visitors of the onsite auto storage and leasing operation; residents of the onsite residences (Figure 4.2-5d); and persons entering the project site to hike in the foothills, practice target shooting, or for other use of the open space (Figure 4.2-5e). (Figure 4.2-6 provides a photo location map for the photographs.) Intermediate and long-range views of the site are available from the San Ysidro Mountains and the higher elevations in Tijuana, Mexico.

### Landform and Visual Policies

Due to the presence of steep slopes within the SPA, the County's Hillside Review Policy (I-73) as well as its Resource Protection Ordinance (RPO) would be applicable to any development within the hillside areas. The County's Hillside Review Policy requires that special analysis and review of projects occurring on hillsides be conducted and provides general hillside development criteria. The intent of the policy is to minimize disturbance of the natural terrain and to preserve and enhance the aesthetic quality of the County. The RPO provides a density formula that limits the number of lots and/or dwelling units in specific slope categories, and requires the dedication of an open space easement over all steep slopes, except for the allowable encroachment area or other specific exemptions. Steep slopes are defined by the RPO as "All lands having a slope with natural gradient of 25 percent or greater and a minimum rise of 50 feet, unless said land has been substantially disturbed by previous legal grading. The minimum rise shall be measured vertically from the toe of slope to the top of slope within the project boundary." (County of San Diego 1990c).

The Otay Subregional Plan and the County's Conservation Element both reference the County's Resource Conservation Area (RCA) program in developing policies to preserve visual resources in the East Otay Mesa area. According to the RCA definitions (see also Section 4.1, Land Use of this EIR), the Otay Mountain area is extremely important and of statewide significance, not only due to the presence of sensitive biological resources, but because it is a major scenic landmark for the region (County of San Diego 1990b, Appendix A). As can be seen in Figure 4.1-5, the Otay Mountain RCA covers the larger



R.J. DONOVAN STATE PRISON

COUNTY EAST MESA DETENTION FACILITY

SAN YSIDRO MOUNTAINS

AIRWAY ROAD

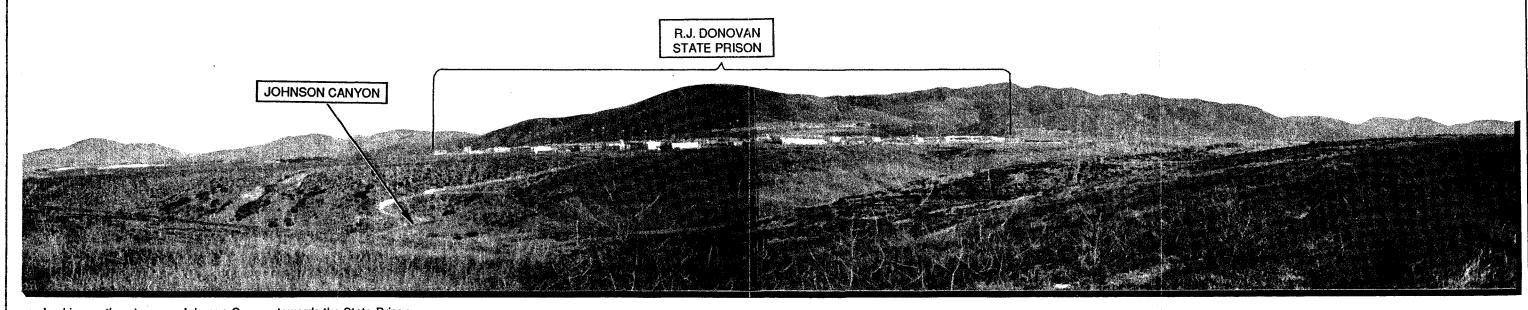
b. Looking east from corner of Airway Road and Paseo de Las Americas



Views of the East Otay Mesa SPA and the San Ysidro Mountains (see Figure 4.2-6 for Photo Location Map)

FIGURE

4.2-3

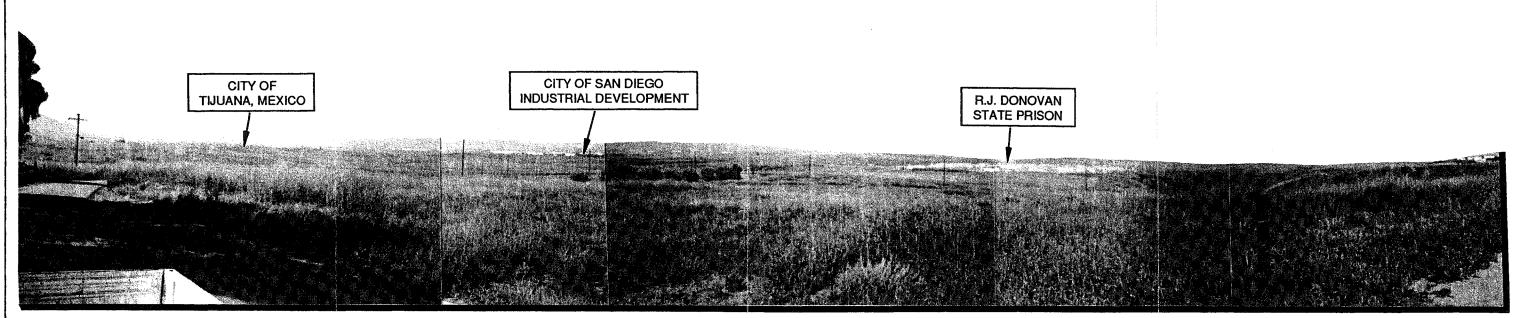


c. Looking northeast across Johnson Canyon towards the State Prison

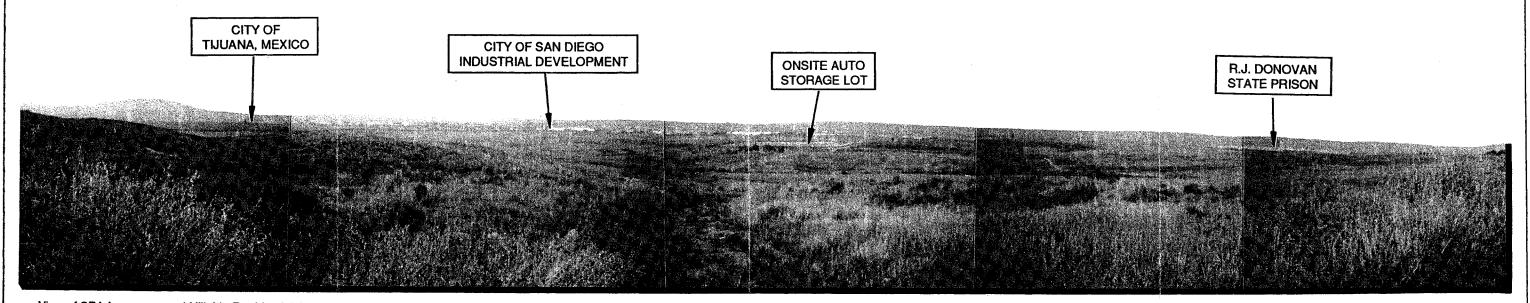
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FIGURE

4.2-4



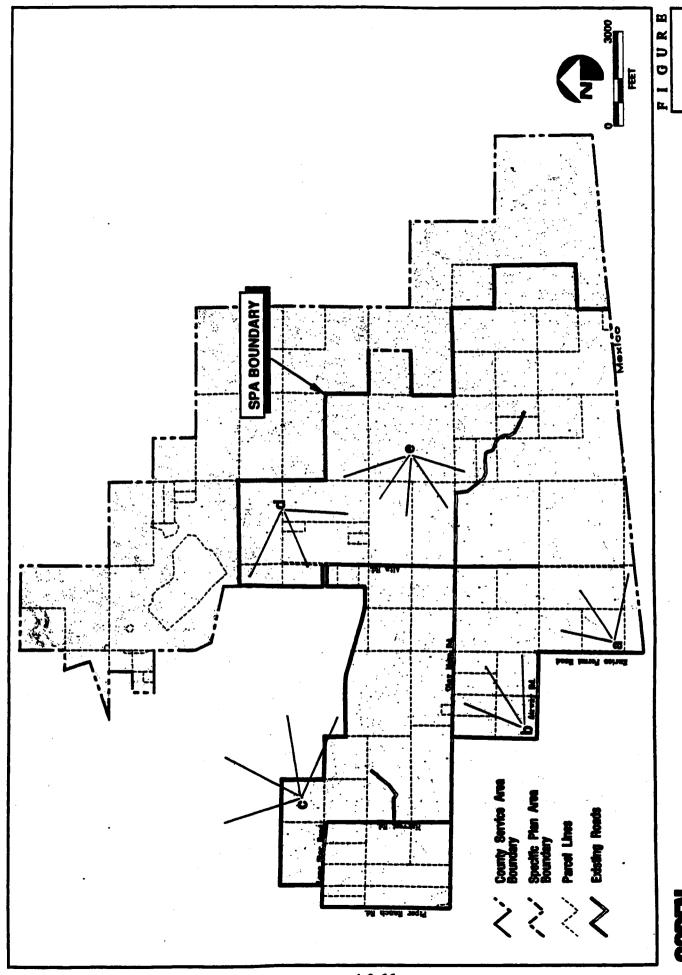
d. View of SPA from Kuebler Ranch



e. View of SPA from proposed Hillside Residential Areas



FIGURE



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Photo Location Map

San Ysidro Mountain area to the east of the East Otay Mesa SPA as well as small portions of the easterly part of the SPA itself. Section 2.7 of the County's Regional Land Use Element states that "Within RCAs, county departments and other public agencies shall give careful consideration and special environmental analysis to all projects which they intend to carry out, propose or approve, and shall select those conservation actions most appropriate to the project and consistent with the intent of this overlay designation" (County of San Diego 1990a).

The only official scenic highways in the County are State Route (SR)-78 within the boundaries of Anza-Borrego Desert State Park and SR-125 from SR-94 to Interstate (I)-8 (County of San Diego 1986). However, the County Scenic Highway Element establishes a number of criteria for prioritizing specific corridor studies for scenic designation. These include (County of San Diego 1986):

- Routes traversing and providing access to major recreation, scenic or historic resources;
- Routes traversing lands under the jurisdiction of public agencies;
- Routes supported by significant local community interest;
- Routes offering unique opportunities for the protection and enhancement of scenic recreational and historical resources.

Projects meeting three or more of these criteria are designated as "Second Priority" projects; and all other projects listed on the Scenic Highway System Priority List are designated as "Third Priority" projects.

The proposed SR-125 from Telegraph Road to the International Border and the proposed SR-905 (Harvest Road and the Otay Freeway) from the International Border to Proctor Valley Road are listed in the County's Scenic Highways Element (1986) as "Third Priority Scenic Routes". Therefore, although these two highways are not currently designated as scenic routes, they may be in the future. Appendix A of the Scenic Highways Element provides scenic highway corridor protection measures that are to be considered when preparing a Specific Plan. These measures include (County of San Diego 1986):

• Land use controls, including building heights and setbacks and screening of offensive uses;

- Subdivision regulations relating to limiting of cut and fill slopes, tree
  preservation, limited access onto scenic highways, utility
  undergrounding, and roadway design;
- Maintenance regulation in the housing section in the building code, fire prevention, litter control programs, weed and insect control, native vegetation replanting, and water pollution control;
- Controls limiting size, location, height, and design of signs and outdoor advertising;
- Location standards for overhead utility line when underground placement is not possible;
- Grading standards to include vegetative cover and screening, erosion control, and limited movement of natural terrain;
- Development design resulting in an attractive appearance and harmonious relationship to the scenic setting;
- Roadway design including realignment, grade, vista points, map and information stops, replanting, and controlled grading.

## 4.2.2 Impacts

The ultimate buildout of the East Otay Mesa SPA would result in the intense development of the flat portions of the site with industrial and commercial land uses as well as with two major highways and a network of surface streets. The hillside portions of the site would be developed with very low density residential land use (1 du per 20 acres) and associated access roads. Most of the hillside areas would be left in open space with the allowable dwelling units clustered on the flatter portions of the site (according to the implementation language of Policy LU-11 of the East Otay Mesa Specific Plan and application of the "G" Designator). These "flatter portions of the site" can be seen in Figure 4.2-2 as the areas within the Hillside Residential district with slope gradients that are 25 percent or less.

The Specific Plan establishes a "Development Limits Line" to specify where major grading is acceptable (Implementation language for Policy COS-2). Within these limits, the Specific Plan allows the industrial and commercial development and includes grading guidelines such as a 15-foot limit on the height of cut and fill slopes, a slope ratio limit of 3:1, and the use of contour grading (Section 5.1.1 of the draft Specific Plan).

For the most part, no significant landform alteration impacts are anticipated within the industrial part of the SPA. However, there is industrially-designated land in the vicinity of

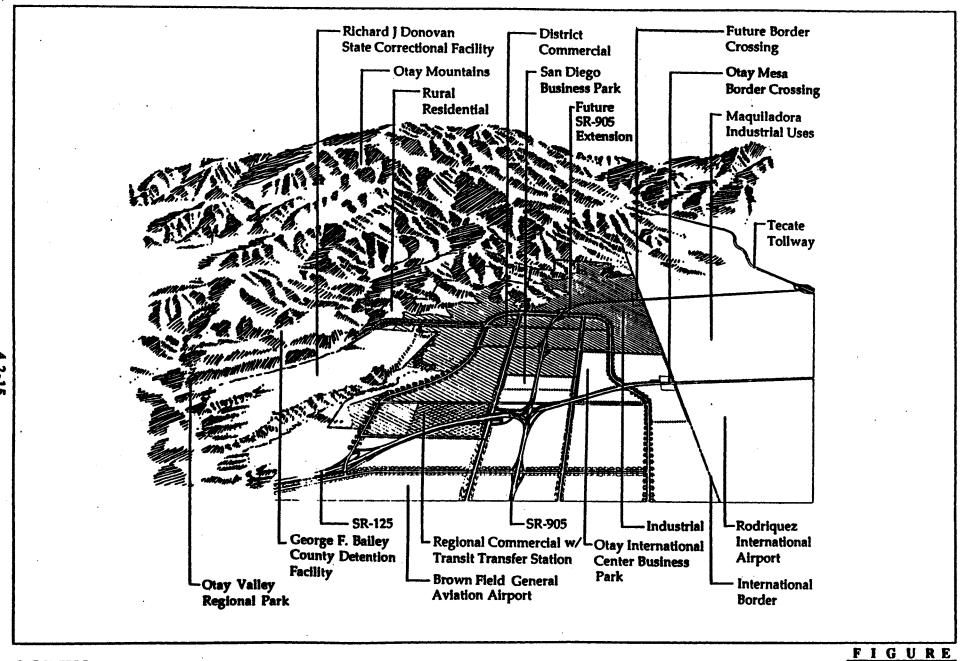
Johnson Canyon. Any fill within the canyon itself or close enough to the canyon to allow erosion of the proposed fill slopes into the canyon would be considered significant and adverse.

Landform alteration impacts of the Hillside Residential district of the SPA are considered to be potentially significant since extensive steep slopes exist in this area which could potentially be graded or disturbed to accommodate dwelling units and roads. No grading plan is available at this time for review and analysis. The Specific Plan would apply the County's "G" Designator overlay to mapped areas of 15 percent slope or greater (see Figure 3-4) so that review of grading plans would occur in those areas prior to tentative map approval. In addition, any hillside development would be subject to County Hillside Review Policy I-73 and the RPO, especially any disturbance of slopes greater than 25 percent. However, until a grading plan has been prepared, it can not be assumed that access to developable residential areas can be provided within the grading restrictions of the applicable policies and ordinances. Extensive cut and fill slopes may be required to provide acceptable access, including emergency fire access.

From a visual standpoint, the sensitive visual receptors of the proposed development areas would be existing residents, future residents, and travelers on proposed scenic routes in the area (i.e., on SR-125 and SR-905). Impacts to residents are considered to be less than significant since the Otay Mesa area is already developing with industrial and institutional uses and the proposed SPA development would be consistent with this type of land use.

The major scenic resources of the area are the Otay River Valley and the San Ysidro Mountains. Existing short-range views of the lower elevations of the San Ysidro Mountains from existing residences on the flat portions of the SPA would be altered as a result of the planned development. Instead of undeveloped open space, the intervening land would be developed with buildings, landscaping, streets and parking lots. However, the creation of new east-west six-lane and four-lane roads across the SPA would provide adequate viewing corridors through the area. Policies UD-1 and UD-2 of the East Otay Mesa Specific Plan provide for the preservation of prominent landforms (Policy UD-1) and of view corridors of the "Otay Mountains, Johnson Canyon and O'Neal Canyon as observed from Alta Road, Lone Star Road, Otay Mesa Road, Siempre Viva Road, SR-125 and SR-905" (Policy UD-2). Figure 4.2-7 shows an artist's rendering of the proposed SPA development against the backdrop of the San Ysidro Mountains. From this rendering it can be seen that the SPA would encroach very little into the mountains when viewed from

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Artist's Rendering of the East Otay Mesa Specific Plan Area FIGURE

4.2-7

any distance. The San Ysidro Mountains (including Otay Mountain) are so extensive and massive in comparison to the SPA, that sensitively-placed development at the base of the mountains would not significantly detract from the aesthetic qualities and dominance that the mountains provide to the area.

According to the County's CEQA Guidelines (April 1991), significant visual effects would occur if a physical change substantially degrades the viewshed of a designated scenic highway, regardless of its priority status. Since the final alignments and elevations of SR-125 and SR-905 in the vicinity of the East Otay Mesa SPA are not known at this time, the viewsheds from these two future scenic highways can not be precisely determined. However, due to the flat nature of the western portions of the SPA where the two highways would be located, it can assumed that the viewsheds would include short-range views of the proposed regional commercial area, short- and medium-range views of proposed industrial areas, and long-range views of the San Ysidro Mountains.

Although the East Otay Mesa Specific Plan does not specifically address the appearance of the project from proposed scenic highways (i.e., SR-125 and SR-905), the proposed development areas within the SPA are required to comply with the Urban Design Element of the East Otay Mesa Specific Plan. The Urban Design Element includes policies to promote "high quality design of buildings and landscaping" (Policy UD-6); to require that "on-site landscaping along public streets should be compatible and complementary with the streetscape design of the public right-of-way" (UD-7); and to require the undergrounding of utilities (Policy UD-8). Policy UD-2 requires that view corridors of the mountains and canyons in the area be preserved from SR-125 and SR-905. The Specific Plan also contains streetscape plans as shown in Figures 3-8 and 3-9 of this EIR. In addition to its Urban Design Element, the Specific Plan includes site planning and design guidelines (Chapter 5) and applies the County of San Diego's "B" Designator overlay to the entire site. The "B" Designator overlay requires that development in the SPA occur according to the approval of a Community Design Review Board that would be charged with ensuring that development occur according to the site planning and design guidelines. Figure 3-12 of this EIR shows an illustrative site plan for the industrial and commercial areas of the SPA.

The Specific Plan includes in its site planning and design guidelines all of the measures listed in the County's Scenic Highways Element as measures that should be considered when preparing a specific plan. The Specific Plan also includes general policies to preserve

view corridors and prominent landforms and to promote an aesthetically-pleasing development, and provides a mechanism to ensure that such development actually occurs (i.e., the Community Design Review Board). Because of these key elements of the proposed Specific Plan, no significant impacts to future scenic highways in the area are anticipated.

# 4.2.3 Level of Significance

Potentially significant impacts to landform alteration could occur as result of allowable residential development in the Hillside Residential areas of the SPA. These areas contain steep slopes (over 25 percent) that may be disturbed by grading associated with dwelling units and access roads. No grading plan is available to review at this time. Potential impacts to Johnson Canyon may also occur.

# 4.2.4 Mitigation Measures

- 1. Site-specific grading plan shall be prepared within the Hillside Residential district of the SPA. Once grading plans are available for review, measures to reduce the amount of landform alteration will be required. The East Otay Mesa Specific Plan requires this additional review at the time that a tentative map is proposed in keeping with the "G" Designator overlay. Other existing County ordinances (i.e., Policy I-73 and the RPO) would also be applied to proposed hillside development.
- 2. 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. Grading plans for industrial development adjacent to the canyon shall incorporate erosion control devices such as covering exposed slopes with visqueen and sandbagging at slope toes during construction and the maintenance of vegetative cover throughout the life of the project.

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#### 4.3 BIOLOGICAL RESOURCES

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The following section is a summary of the Biological Technical Report prepared by Ogden Environmental and Energy Services Company for the East Otay Mesa Specific Plan. The Biological Technical Report addresses the existing biological conditions on the project site, the implications and potential impacts to biological resources as a result of specific plan implementation and recommends mitigation measures. The report is available for review at the County Department of Planning and Land Use.

## 4.3.1 Existing Conditions

Existing data for the study area (the entire CSA) were collected from a variety of sources, including the California Natural Diversity Data Base (CNDDB), the California Native Plant Society's (CNPS) Inventory of Rare and Endangered Vascular Plants of California (Smith and Berg 1988), environmental impact reports (EIRs), soils maps (USDA 1973), discussions with local experts, and the vernal pool data base (Bauder 1986). These references are cited where appropriate in the text.

Detailed biological surveys were conducted of the CSA from April through July 1991. Vegetation maps were produced from aerial photograph interpretation and information collected from existing maps and from EIRs and other reports. Additionally, known sensitive resource locations from the CNDDB, EIRs, and other sources were plotted. These maps were then verified in the field.

The following discussion of existing biological resources covers the entire CSA, while the impact area encompasses the SPA only.

#### Vegetation/Habitats

A number of vegetation types and subtypes were mapped within the study area, including both native and nonnative associations. Vegetative associations mapped onsite include coastal sage scrub (including *Rhus integrifolia*-dominated scrub and disturbed coastal sage scrub), chaparral (including chamise chaparral, southern mixed chaparral, and disturbed chaparral), grassland (*Stipa* grassland and nonnative grassland), southern interior cypress forest, southern willow scrub, mulefat scrub, tamarisk scrub, freshwater marsh, vernal pools, disturbed wetlands, disturbed floodplain, eucalyptus woodland, exotic trees,

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agriculture, disturbed habitat, and developed areas. Other mapping units include open water (including reservoirs), unvegetated "waters of the U.S." (mapped as "jurisdictional habitat"), and rock outcrop/bedrock. All associations or mapping units are discussed below with respect to general habitat structure, species composition, location within the study area, and acreages both within the entire study area (i.e., the CSA) and in the SPA. Table 4.3-1 includes a summary of acreages of each habitat type in the study area. A vegetation map (Plate 1) is included in the map pocket of this EIR.

Sensitive habitats are those which are considered rare in the region, support sensitive plants or animals, receive regulatory protection (i.e., wetlands under the ACOE 404 permit process and/or the CDFG 1600-1606 Streambed Alteration Agreement), or are listed by the Conservation Element of the General Plan for the County of San Diego (County of San Diego 1980). In addition, the CNDDB of the CDFG has designated a number of communities as rare; these communities are given the highest inventory priority (Holland 1986). Sensitive habitat types within the study area are discussed below.

<u>Diegan Coastal Sage Scrub</u>. The majority of sage scrub in the study area is dominated by California sagebrush (*Artemisia californica*), and is mapped as coastal sage scrub. A distinct subtype, lemonadeberry (*Rhus integrifolia*)-dominated scrub, also occurs onsite. A final sage scrub category, disturbed coastal sage scrub, is also differentiated onsite. These associations are discussed below.

Coastal sage scrub is comprised of low, soft-woody subshrubs to about 1 m (3 ft) high, many of which are facultatively drought-deciduous. This association is typically found on dry sites, such as steep, south-facing slopes or clay-rich soils that are slow to release stored water. Dominant shrub species in this vegetation type may vary, depending on local site factors (e.g., slope aspect) and levels of disturbance. Coastal sage scrub within the study area is dominated primarily by California sagebrush and flat-top buckwheat (*Eriogonum fasciculatum* ssp. fasciculatum). Additional, less frequent constituents (or locally common constituents) of this community include San Diego County viguiera (Viguiera laciniata), laurel sumac (Malosma laurina), white sage (Salvia apiana), black sage (Salvia mellifera), spiny redberry (Rhamnus crocea), and deerweed (Lotus scoparius), among others. The shrub layer in this community ranges from a continuous canopy supporting little understory to a more open canopy of widely-spaced shrubs with a well-developed understory.

Table 4.3-1

SUMMARY OF VEGETATION ACREAGE
ON THE EAST OTAY MESA PROJECT SITE^{1,2}

Vegetation Type	Within SPA (Acres)	Outside SPA (Acres)	Total (Acres)	% of Tota in Spa
Coastal Sage Scrub	624.19	1071.94	1696.13	36.8
Rhus integrifolia-dominated Coastal Sage Scrub	3.75	0.00	3.75	100.0
Disturbed Coastal Sage Scrub	206.49	250.90	457.40	45.1
Chamise Chaparral	75.34	160.01	235.35	32.0
Southern Mixed Chaparral	3.96	132.52	136.48	2.9
Disturbed Chaparral	0.00	15.45	15.45	0.0
Stipa Grassland	27.46	3.92	31.38	87.5
Nonnative Grassland	402.46	13.53	415.99	96.8
Southern Interior Cypress Forest	1.04	75.81	76.85	1.4
Southern Willow Scrub	0.00	1.26	1.26	0.0
Mulefat Scrub	1.07	0.00	1.07	100.0
Tamarisk Scrub	3.18	0.40	3.58	88.8
Freshwater Marsh	2.27	2.65	4.92	46.1
Vernal Pools ³	0.63	0.63	1.26	50.0
Disturbed Wetland	1.24	0.37	1.61	77.0
Eucalyptus Woodland	1.36	2.38	3.75	36.5
Exotic Trees	0.23	0.06	0.29	79.3
Agriculture	1748.04	0.00	1748.04	100.0
Disturbed Habitat	118.39	41.29	159.69	74.1
Developed Habitat	73.68	115.36	189.05	39.0
Open Water (including reservoirs)	2.55	14.71	17.26	14.8
Disturbed Floodplain	0.00	6.16	6.16	0.0
Unvegetated "Waters of the U.S." (ACOE Jurisdictional Habitat)	2.46	<b>2.78</b>	5.24	47.0
Rock Outcrop/Bedrock	0.29	18.72	19.01	1.5
TOTAL ACREAGE	3300.08	1930.85	5230.97	63.1

SPA = East Otay Mesa Specific Plan Area; Total = vegetation in the entire Community Service Area (CSA) (i.e., within and outside of the Specific Plan Area).

Number of decimal places presented in table is a function of the GIS digitizing system, and does not reflect a comparable level of accuracy in the vegetation mapping. Numbers are rounded off, where appropriate, in the text.

³ Does not include known or potential vernal pool habitat detected along the U.S.-Mexican border in unrelated studies (Ogden in progress).

Coastal sage scrub is the dominant vegetation type on most of the north-facing slopes and all of the south and west-facing slopes from the northern CSA boundary to the U.S.-Mexican border. Approximately 1696 acres of coastal sage scrub occur within the CSA. Of this total, 624.2 acres (36.8 percent of this habitat in the study area) occur in the SPA. A single stand of lemonadeberry-dominated scrub (3.8 acres) occurs within the SPA on a north-facing slope in O'Neal Canyon, just south of the East Mesa Detention Facility.

A "disturbed" qualifier was placed on coastal sage scrub (or any other native habitat) based on evidence of mechanical disturbance (e.g., brushing or clearing, ORV activity), the presence of a high percentage of nonnative species, and/or habitat fragmentation as a result of human-caused disturbances. Natural disturbance, such as fire, was not included in this category due to the high potential for the community to regenerate/reestablish within a relatively short time period. Disturbed coastal sage scrub is found on the lower portions of south-facing slopes overlooking the border; at the base of west-facing slopes adjacent to agricultural areas; west of Harvest Road; and in isolated patches on higher slopes and plateaus. Disturbed coastal sage scrub in the CSA totals 457.4 acres. Of this total, approximately 206.5 acres (45.1 percent) occur within the SPA.

Horse and goat herds from south of the border have damaged and denuded the lowlands and lower southern slopes of the San Ysidro Mountains through continual overgrazing. Heavy ORV activity from U.S. Border Patrol activities, police training, and recreational use have caused additional wildlife habitat degradation. Edge effects from the dense residential developments south of the border (e.g., dogs and cats, dust, noise, and trash dumping) were observed onsite, as was evidence of frequent brush fires which probably resulted from trash burning and campfires.

Coastal sage scrub is considered a sensitive habitat by the County of San Diego and is given the highest inventory priority by the CNDDB. Coastal sage scrub was listed as the third most extensive vegetation community in the county over 25 years ago (CDFG 1965); however, Oberbauer (1978) suggested that up to 70 percent of the county's original sage scrub habitat had been destroyed or modified, and this loss has continued throughout the last decade, primarily due to urban expansion. Additional evidence of the decline of this once common habitat is the growing number of declining plant and animal species dependent upon it, including the California gnatcatcher.

<u>Chaparral</u>. Chaparral is widely distributed throughout California on dry slopes and ridges at low and medium elevations where it occupies thin, rocky, or heavy soils. It is typically composed of broad-leaved, sclerophyllous shrubs (i.e., having thick, leathery leaves), although species composition varies considerably with location and local conditions. The plants of this community have developed the ability to survive recurrent natural fires by producing seeds that require a fire-related cue to stimulate germination and/or by stump sprouting after being burned. Species of the following genera are characteristic in chaparral associations: *Adenostoma*, *Arctostaphylos*, *Ceanothus*, *Cercocarpus*, *Heteromeles*, shrubby *Quercus*, and *Rhamnus*. Two distinct chaparral associations, as recognized by Holland (1986), occur within the study area: chamise chaparral and southern mixed chaparral.

Chamise chaparral is dominated by nearly monotypic stands of chamise (Adenostoma fasciculatum) to 1-3 m (3-9 ft) in height. Within the study area, this association occurs predominantly on south- and west-facing slopes in the eastern portion of the site. A total of 235.4 acres of chamise chaparral occur within the CSA; of this total, 75.3 acres (32 percent) lie within the SPA.

Southern mixed chaparral tends to occur on steeper, more mesic north-facing slopes than chamise chaparral. This vegetation type is characterized by a relatively high diversity of species. Typical species detected onsite include chamise, Ramona ceanothus (Ceanothus tomentosus ssp. olivaceus), Eastwood manzanita (Arctostaphylos glandulosa ssp. glandulosa), scrub oak (Quercus berberidifolia), holly-leaf cherry (Prunus ilicifolia), toyon (Heteromeles arbutifolia), and gooseberry (Ribes spp.). Approximately 136.5 acres of southern mixed chaparral occur within the CSA; only 4.0 acres (2.9 percent) are found within the SPA.

As with coastal sage scrub, disturbed phases of chaparral have been identified within the study area. A total of approximately 15.5 acres of disturbed chaparral occur within the CSA; none of this association is found in the SPA.

Chaparral is relatively widespread in the county. Most phases of this association are not considered sensitive per se, except where they support occurrences of sensitive plant and animal species, or where they function as important buffers or wildlife corridors.

<u>Grassland</u>. Vegetation classified as grassland includes areas dominated by both native bunchgrasses and nonnative grasses and other annual species. The former, referred to as *Stipa* grassland, is generally small in areal extent, except for one large stand near the border. Nonnative grassland is more common onsite, and generally occurs at the interface between scrub habitats and agricultural areas.

Stipa grassland is characterized by a moderate to dense herbaceous cover of the perennial, tussock-forming species, purple needlegrass (Stipa pulchra), and most closely corresponds to Holland's (1986) valley needlegrass grassland. Native and introduced annuals occur between the tussocks, and often actually exceed purple needlegrass in total cover (Holland 1986). The degree of habitat quality in native grasslands varies greatly, depending on the history of grazing, cultivation, or other disturbance factors.

Within the study area, Stipa grassland occurs in a large stand (27.5 acres) along the U.S.-Mexican border, and in isolated patches on slopes in the northern portion of the site. The Stipa grassland along the border has a relatively low percent cover of purple needlegrass (ca. 5-10 percent) but has relatively high cover of native species overall (ca. 50%) including native wildflowers and subshrubs. This area is disturbed by repeated fires and grazing and also supports substantial cover of non-native grasses. Portions of this grassland are beginning to be colonized by coastal sage scrub species, such as flat-top buckwheat and goldenbush (Isocoma veneta). However, this area does support a good diversity of native herbs, such as blue-eyed grass, golden star, owl's clover, and variegated dudleya, in addition to purple needlegrass. The overall quality of this habitat is considered moderate to high. Approximately 31.4 acres of native grassland occur within the CSA. Of this total, 27.5 acres (87.5 percent) are found in the SPA.

Stipa grassland is considered sensitive by the County of San Diego and the CNDDB due to its limited distribution, potential for supporting sensitive plant species, and habitat loss from agricultural activities and urban and rural development. It is estimated that 94 percent of this habitat has been lost in the county (Oberbauer and Vanderwier 1991).

Nonnative grassland generally occurs on fine-textured loam or clay soils which are moist or even waterlogged during the winter rainy season and very dry during the summer and fall. This association is characterized by a dense to sparse cover of nonnative annual grasses, often with native and nonnative annual forbs (Holland 1986). This habitat is a disturbance-related community most often found in old fields or openings in native scrub or grassland

habitats. This association may have replaced native grassland and coastal sage scrub at many localities throughout the study area. Approximately 416 acres of nonnative grassland occur within the CSA. Of this total, 402.5 acres (96.8 percent) occur within the SPA.

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Nonnative grassland is not considered sensitive and is generally not constrained by development, unless it supports sensitive plant or animal species.

Southern Interior Cypress Forest. Southern interior cypress forest is a relatively dense, low, fire-maintained coniferous forest dominated by Tecate cypress (Cupressus forbesii).

Southern interior cypress forest occurs at several locations throughout the eastern portion of the study area. Tecate cypress is locally common on portions of Otay Mountain, occurring within chaparral on slopes and ridges and dominating steep drainages. The occurrence of individuals or small stands of Tecate cypress in drainages at lower elevations (i.e., O'Neal Canyon) is undoubtedly attributable to seed dispersal from the main population. Stands of Tecate cypress on Otay Mountain vary from large numbers of presumably even-aged saplings growing up through the chaparral canopy to stands of mature individuals dominating a dense understory of chaparral shrubs. Approximately 76.9 acres of southern interior cypress forest occur within the CSA; only 1.0 acre (1.4 percent) occurs within the SPA.

Southern interior cypress forest is considered sensitive by the County of San Diego and the CNDDB. This habitat has a limited distribution, occurring only in four isolated groves in the Peninsular Ranges of southwestern California (Otay Mountain, Guatay Mountain, and Tecate Peak and Sierra Peak in Orange County); individual cypress trees or small stands of trees onsite are part of the Otay Mountain population. Tecate cypress, which is the dominant canopy member in this habitat, is considered a sensitive species by the CNPS (Smith and Berg 1988) and a candidate species (category 2) for federal listing.

Wetland communities (southern willow scrub, mulefat scrub, tamarisk scrub, freshwater marsh, vernal pool, and disturbed wetland) are considered a sensitive and declining resource by several regulatory agencies including the CDFG and the USFWS. Wetlands are specifically addressed by the CDFG Code sections 1600-1606 (Streambed Alteration Agreement), and are also covered under the jurisdiction of the ACOE section 404 permit process (Reinen 1978). Clean Water Act permit provisions regulating dredge and fill operations are enforced by the ACOE and U.S Environmental Protection Agency (EPA),

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with technical input from the USFWS. Because of the sensitivity of wetland habitats and the regulatory constraints associated with them, particular attention was focused on determining whether habitat associated with drainages constituted "wetlands." However, detailed wetland delineations were not conducted as part of this study.

Southern Willow Scrub. Southern willow scrub is a dense, broad-leaved, winter-deciduous association dominated by several species of willow (Salix spp.), with scattered emergent individuals of western sycamore (Platanus racemosa) (Holland 1986). Willow species detected within the study area include black willow (Salix gooddingii var. variabilis), arroyo willow (Salix lasiolepis var. bracelinae), and red willow (Salix laevigata). Onsite, southern willow scrub is found along the Otay River, where it occupies approximately 1.3 acres. This association does not occur in the SPA.

<u>Mulefat Scrub</u>. Mulefat scrub is a riparian scrub community dominated by mulefat (*Baccharis glutinosa*) (Holland 1986). Understory vegetation is usually composed of nonnative, weedy species or is lacking altogether. Only a few stands of mulefat scrub occur onsite (e.g., adjacent to a pond in the south-central area, and west of Harvest Road). This association totals 1.1 acres, all of it occurring in the SPA.

Tamarisk Scrub. Tamarisk scrub is a disturbed form of either southern willow scrub or mulefat scrub. This association is characterized by nearly monotypic stands of the highly invasive, nonnative plant species, tamarisk (*Tamarix* sp.). Tamarisk scrub occurs in a narrow band at the foot of coastal sage scrub east of Alta Road and in the drainage north of the East Mesa Detention Facility. Approximately 3.6 acres of tamarisk scrub occur in the CSA, with 3.2 acres (88.8 percent) of the total habitat onsite occurring in the SPA.

Freshwater Marsh. Freshwater marsh is dominated by perennial, emergent monocots to 1.3 to 2 m (4.3 to 6.6 ft) tall. Uniform stands of bulrush (Scirpus spp.) or cattail (Typha spp.) often characterize this habitat. Freshwater marsh occurs in wetlands that are permanently flooded by standing fresh water (Holland 1986). This association occurs in many of the intermittent drainages onsite, where it is dominated by two wetland-dependent species, spiny rush (Juncus acutus var. sphaerocarpus) and San Diego marsh elder (Iva hayesiana). Associated species detected within the study area include lesser cattail (Typha angustifolia), tall cattail (Typha latifolia), prairie bulrush (Scirpus robustus), Mariposa rush (Juncus dubius), pale spike-rush (Eleocharis macrostachya), duckweed (Lemna sp.), and common monkey-flower (Mimulus guttatus ssp. guttatus). Approximately 4.9 acres of

4.3-8

freshwater marsh occur within the CSA. Of this total, 2.3 acres (46.1 percent) lie within the SPA.

<u>Vernal Pools</u>. Vernal pools are a highly specialized plant habitat occurring on mesa tops and supporting a unique assemblage of floral species (Purer 1939; Zedler 1987). Vernal pools consist of slight depressions on otherwise level mesa tops that fill with rainwater during the winter months. Once filled, the water does not drain off or percolate away due to the flat topography and underlying hardpan or claypan soil layers that prevent or impede subsurface drainage. The plant species restricted to vernal pool habitats constitute what Thorne (1976) calls the vernal pool ephemeral plant community and Holland (1986) refers to as San Diego mesa vernal pools. Holland recognizes two types of vernal pools in San Diego County: San Diego mesa claypan vernal pools associated with southern mesas (e.g., East Otay Mesa) and San Diego mesa hardpan vernal pools associated with northern mesas.

Vernal pools are often associated with microtopographic relief consisting of low hummocks scattered over the surface of the mesa tops. Such topographic features are called mima mounds. Vernal pools typically form in the shallow depressions between mima mounds and there is generally a hydrologic connection among pools forming a sort of microwatershed.

Examples of the least fragmented, most extensive San Diego mesa claypan vernal pool complexes remaining are on coastal terraces around Lower Otay Reservoir (K series), in Proctor Valley (R series), and on Otay Mesa near Brown Field (J29 and J30 pool groups), the State Prison (J23-J25 groups), and the East Mesa Detention Facility (J26 group) (Bauder 1986). The majority of these pools are in private ownership and currently are not preserved or formally protected. The City of San Diego owns the K3-K5 pool group and is committed to protecting a minimum of 35 acres of this complex (Bauder 1986). The R1 pool group and a portion of the J26 group are also owned by the City of San Diego, but currently do not have any preserve status (Bauder 1986).

During the 1991 surveys, San Diego mesa claypan vernal pools were mapped on the mesa south of Johnson Canyon (J22 pools) and on the mesa top between the Otay Water District Reservoir and Otay River in the northwestern corner of the study area (J26 pools) (refer to Plate 1). Sensitive vernal pool plant species detected in these pools include San Diego button celery (*Eryngium aristulatum* var. *parishii*), prostrate navarretia (*Navarretia fossalis*), and Otay mesa mint (*Pogogyne nudiuscula*). Approximately 1.3 acres of surface

4.3-9

area of vernal pool basins were detected within the CSA during field surveys associated with this project. Of this total, 0.63 acre (50.0 percent) occurs within the SPA.

The J-22 vernal pool complex, which includes seven vernal pools, is situated on a mesa just south of Johnson Canyon, and occurs in a matrix of disturbed coastal sage scrub. Characteristic scrub species in this matrix include California buckwheat (Eriogonum fasciculatum), California sagebrush (Artemisia californica), flat-topped golden yarrow (Eriophyllum confertiflorum), deerweed (Lotus scoparius), coastal prickly pear (Opuntia littoralis), nodding stipa (Stipa pulchra), slender wild oat (Avena barbata), rosin weed (Calycadenia tenella), lilac mariposa (Calochortus splendens), fascicled tarweed (Hemizonia fasciculata), foxtail fescue (Vulpia myuros var. hirsuta), Australian saltbush (Atriplex semibaccata), Russian-thistle (Salsola australis), and cat's ear (Hypochoeris glabra) on the mound areas, and goldenbush (Haplopappus venetus), nodding stipa, mesa brodiaea (Brodiaea jolonensis), blue-eyed grass (Sisyrinchium bellum), and pin-clover (Erodium botrys) in the lower-lying areas outside the actual pools. Species at the margins of pools include Italian ryegrass (Lolium perenne), toad rush (Juncus bufonius), and grass poly (Lythrum hyssopifolia). Species within the pools include dwarf woolly-heads (Psilocarphus brevissimus), pale spike-rush (Eleocharis macrostachya), graceful hairgrass (Deschampsia danthonioides var. gracilis), crassula (Crassula aquatica), pill-wort (Pilularia americana), flowering quillwort (Lilaea scilloides), and waterwort (Elatine sp.), in addition to the sensitive species San Diego button-celery (Eryngium aristulatum var. parishii) and prostrate navarretia (Navarretia fossalis). The exception to the vernal pool floristic composition listed above is pool 6, which primarily supports dense stands of pale spikerush.

Six of the seven vernal pools are natural basins, whereas one pool appears to have been formed by the creation of a berm and subsequent ponding. This pool is long and narrow and lies adjacent to an existing dirt road. San Diego button-celery was detected in three of the natural vernal pools. However, conditions were not quite optimal in 1991 and this was preceded by a number of drought years; therefore, population sizes noted during the survey period may have been depressed compared to current conditions. These pools should be surveyed during an optimal rainfall year (i.e., average or above-average precipitation) or preferably, during multiple, optimal years, to get a better indication of population size and fluctuations. In other vernal pools in the County, dramatic increases in population size of vernal pool species were noted in 1992 and, in particular, 1993. Prostrate navarretia was found in one of the natural pools in 1991; this species had not been detected in this complex

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in previous surveys. Although two of the natural pools did not support any sensitive species in 1991, they did support many nonsensitive vernal pool indicator species (see above) and the potential exists that sensitive species could occur in these pools during periods of optimal conditions. The vernal pool created by the berm did not support any sensitive species, nor did it support the diversity of nonsensitive vernal pool indicator species found in the other pools. In addition to the sensitive vernal pool species, two additional sensitive species, coast barrel cactus (Ferocactus viridescens) and variegated dudleya (Dudleya variegata) occur in the disturbed coastal sage scrub on the mesa.

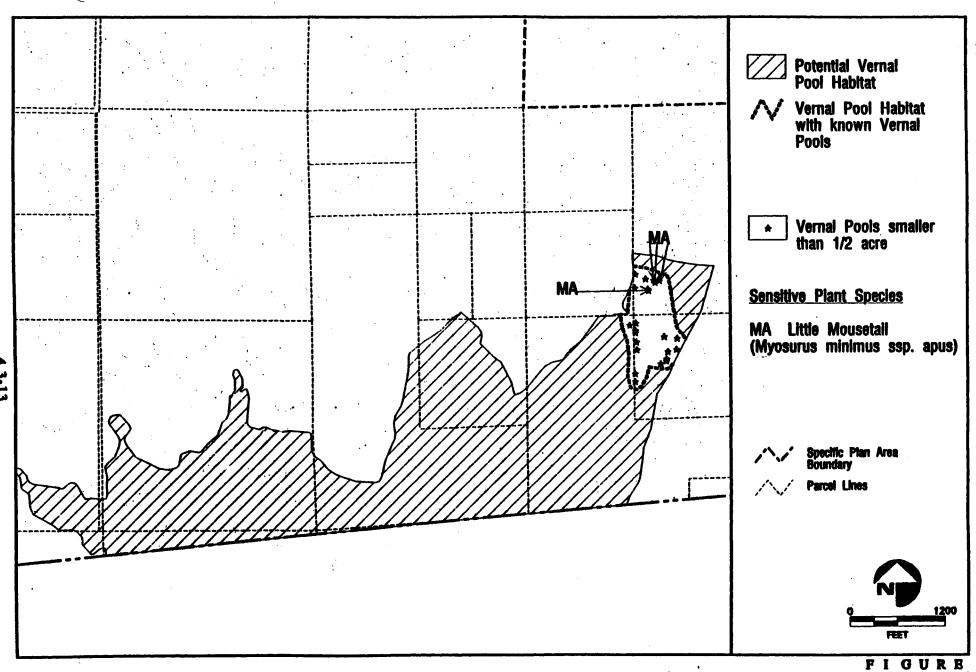
Mima mound topography is also present along the U.S.-Mexican border. This area was not mapped as vernal pool habitat during the 1991 surveys because of the lack of vernal pool indicator species. In addition, no vernal pools had been mapped in this area in previous surveys (Beauchamp 1979; Bauder 1986; WESTEC 1985). However, during spring 1993, which was characterized by extremely high rainfall and optimal conditions for many species, a portion of this mima mound-pool area along the border was surveyed for an unrelated project (Ogden in progress). Vernal pool indicator species were present in a subset of the surveyed area, and 24 vernal pools were subsequently mapped. Based on the recent findings, the entire mima mound-pool area along the border is considered potential vernal pool habitat. This area is shown in Figure 4.3-1. The vernal pool overlay, which includes newly detected and "potential" vernal pool habitat, comprises approximately 290 acres, most of which were mapped as disturbed coastal sage scrub (22.1 acres), Stipa grassland (19.8 acres), nonnative grassland (183.6 acres), or agriculture (54.7 acres) for this project. Smaller mapping units include open water (0.17 acre), disturbed wetland (0.12 acre), and disturbed habitat (9.5 acres). Of this acreage, known vernal pools occupy 18 acres of vernal pool-mima mound habitat (see Figure 4.3-2).

Vernal pool habitat is also defined as a wetland by the USFWS (Cowardin et al. 1979) and is considered sensitive by the resource agencies. Vernal pools contain a number of high interest plant species and provide temporary breeding pools for amphibians. The great majority of these pools are in danger of being eliminated in the near future due to urbanization. It has been estimated that more than 97 percent of the original vernal pool habitat within the San Diego region has been eliminated (Oberbauer and Vanderwier 1991).

<u>Disturbed Wetland</u>. Areas mapped as disturbed wetlands include wetland habitat that has been recently cleared or otherwise physically disturbed and/or is dominated by herbaceous, nonnative wetland indicator plant species. Categorization of a site as a disturbed wetland

Potential and Known V-rnal Pool Habitat





OGDEN

**Vernal Pools within Vernal Pool Habitat** 

4.3-2

was done based on the presence of hydric soils and/or nonnative wetland indicator plant species.

Disturbed wetland habitat occurs in the westernmost portion of the site (east of Piper Ranch Road and Harvest Road, respectively), near a pond in the south-central part of the site, and along the Otay River. Approximately 1.6 acres of disturbed wetlands occur within the CSA. Of this total, 1.2 acres (77 percent) lie within the SPA.

Eucalyptus Woodland. Eucalyptus woodland is typically characterized by dense stands of gum trees (Eucalyptus spp.). Stands of eucalyptus trees were detected between Piper Ranch Road and Harvest Road, east of the intersection of Otay Mesa Road and Alta Road, at the foot of the south-facing slope in the south-central portion of the study area, and on a west-facing slope just north of the East Mesa Detention Facility. Approximately 3.8 acres of eucalyptus woodland occur within the CSA, with 1.4 acres (36.5 percent) of this total found within the SPA.

Exotic Trees. Exotic trees (exclusive of eucalyptus trees) are generally concentrated around existing structures and former home sites. Within the study area, exotic trees occur primarily in a windrow near the Kuebler Ranch. A small stand of exotic trees also occurs in the Otay River, in the northern portion of the CSA. Exotic trees comprise 0.29 acre in the CSA, with 0.23 acre (79.3 percent) of this total occurring within the SPA.

Agriculture. Areas mapped as agriculture include actively cultivated lands or lands that have been fallow for a relatively short period of time (i.e., 1-2 years). The entire western portion of the study area is dominated by active and former agricultural lands. Agricultural lands comprise 1748 acres within the CSA, and all of this acreage occurs in the SPA.

<u>Disturbed Habitat</u>. Disturbed habitat is any land on which the native vegetation has been significantly altered by agriculture, construction, or other land-clearing activities, and the species composition and site conditions are not characteristic of the disturbed phase of one of the native plant associations occurring within the study area. Disturbed habitat occurs throughout much the study area, and is particularly common at the interface between native habitat and agricultural lands, and adjacent to developed areas and roads. Approximately 159.7 acres of disturbed habitat occur within the CSA. Of this total, 118.4 acres (74.1 percent) occur within the SPA.

Open Water. Open water includes reservoirs, ponds, and relatively large sloughs, channels, and rivers or streambeds that contain water throughout the year. Open water, like wetlands and unvegetated drainages, is considered "waters of the U.S.," and therefore falls under the regulatory jurisdiction of the U.S. Army Corps of Engineers (ACOE). Open water is present in the Otay River channel, on the mesa north of the detention facility (e.g., reservoirs), and in scattered stock ponds in the central portion of the study area. Approximately 17.3 acres of open water occur within the CSA, although only 2.6 acres (14.8 percent) of this association are found within the SPA.

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<u>Disturbed Floodplain</u>. Floodplains or flood channels are unvegetated or sparsely vegetated drainages, and are generally considered "waters of the U.S." by the ACOE. Areas were designated as disturbed floodplains or flood channels if the channel had been artificially cleared or disturbed, or if it was dominated by nonnative trees and lacked any native riparian component. Disturbed floodplain habitat occurs in the northern portion of the site, in the Otay River channel. This habitat comprises approximately 6.2 acres within the CSA, and none of this occurs within the SPA.

Unvegetated Waters of the U.S. (ACOE jurisdictional habitat). Unvegetated "waters of the U.S." typically include the unvegetated portion of intermittent drainages. Wetland vegetation (e.g., southern willow scrub, mulefat scrub, tamarisk scrub, freshwater marsh, disturbed wetlands) and open water are also "waters of the U.S.," as discussed above. All "waters of the U.S." are considered jurisdictional habitat by the ACOE under the Clean Water Act Section 404 permit program. Unvegetated "waters of the U.S." were delineated because of potential permit considerations. These drainages clearly show some sign of periodically carrying water.

Unvegetated "waters of the U.S." occur in the main north-south drainage in the southeast portion of the study area, in a smaller drainage to the east, in O'Neal Canyon, and in the tributary leading to Otay River. Approximately 5.2 acres of this association occur within the CSA. Of this total, 2.5 acres (47.0 percent) occur within the SPA.

Rock Outcrop/Bedrock. Rock outcrops and exposed bedrock represent a distinct habitat type by providing very different microhabitat conditions. The primary distinction between rock outcrops and surrounding lands is the lack of a well-developed substrate capable of supporting the roots of many plant species. Rock outcrops are present near the tops of steep slopes in the southeastern portion of the study area, and along cliffs on both sides of

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the Otay River channel. Approximately 19 acres of rock outcrops were mapped within the CSA; however, only 0.29 acre (1.5 percent) occurs within the SPA.

#### **Habitat Ouality**

In general, the regions of highest wildlife value occur in the northern and eastern portions of the study area. Each of these areas possesses a diversity of habitats, including Diegan coastal sage scrub, southern mixed chaparral, chamise chaparral, southern interior cypress forest, southern willow scrub, freshwater marsh, and vernal pools. In terms of species richness, each of these habitats has species that are either specialists in a specific habitat (e.g., California gnatcatchers in certain phases of Diegan coastal sage scrub) or prefer one habitat type over another even though they are not restricted to any particular habitat (e.g., orange-throated whiptail, which prefers open Diegan coastal sage scrub but is not restricted to it). In addition, there are wildlife species such as mountain lion (Felis concolor) and bobcat (Felis rufus) that utilize all the habitat types in their normal activities (i.e., foraging and patrolling territories). Because of this variety in wildlife habitat specialization and because habitats intergrade throughout the study area, wildlife habitat value cannot be assessed solely on a habitat-by-habitat basis. The habitats present in the study area can be ranked by overall species diversity (e.g., riparian zones are more species-rich than chamise chaparral and support more wildlife), but this does not necessarily infer that the removal of chamise chaparral would not be detrimental to the continued support and existence of wildlife on a regional level. This discussion implicitly refers to habitat connectivity, which is of the utmost importance in the maintenance of viable wildlife populations. This section will focus on specific localities and their assets (or lack thereof) for maintaining wildlife populations.

The western portion of the site is the most thoroughly disturbed region in the study area, with only isolated pockets of natural habitat remaining. The majority of this area consists of old agricultural fields, residential property, and light industrial areas. Scattered throughout this area are small patches of mulefat scrub and disturbed wetlands. Johnson Canyon, the only major drainage in this portion of the site, is important due to the presence of vernal pools on its southern ridgeline and pockets of freshwater marsh in the canyon bottom. Johnson Canyon is known to support gnatcatchers, although no gnatcatchers were detected in that portion of the canyon that lies within the SPA boundary. The canyon also connects with the Otay River Valley to the north on the Otay Ranch property. In turn, the

Otay River Valley may play an important role as a wildlife corridor to Salt Creek and Poggi Canyon.

The southern portion of the site contains active grazing land for goats, cattle, and horses, and much of the coastal sage scrub habitat in this area is currently disturbed. One noteworthy unnamed drainage occurs in the eastern portion of this area. It supports a narrow band of riparian habitat, bordered by intact Diegan coastal sage scrub to the north, and disturbed coastal sage scrub to the south. This drainage contains gnatcatchers, and extends up into the San Ysidro Mountains, connecting with open space on BLM property to the east.

The northern portion of the site is dominated by Diegan coastal sage scrub, with vernal pools on the mesa tops overlooking the Otay River Valley. Except for the developed areas of the East Mesa Detention Facility and the Otay Water District water tanks, the wildlife habitat quality is very high for this portion of the site. There are three areas that are particularly important in terms of wildlife habitat. The Otay River Valley crosses the northern tip of the CSA, and may act as a wildlife corridor to Salt Creek, Proctor Valley, Poggi Canyon, and the Otay Reservoir. Habitats within the steep-walled valley consist of rock pools and ponds among patches of freshwater marsh and riparian vegetation. Some coastal sage scrub habitat exists high on the cliffs. O'Neal Canyon runs through the northern portion of the site and connects to the BLM open space to the east in the San Ysidro Mountains. Dry, unvegetated portions of the channel are considered "waters of the U.S.;" much of the remaining drainage bottom is dominated by southern interior cypress forest. An unnamed, north-south oriented drainage east of the detention facility contains wetlands (e.g., freshwater marsh) and ACOE jurisdictional habitat, and may act as a link between the Otay River Valley and O'Neal Canyon. This area may also be important as a watering area for wildlife during the dry season. Gnatcatchers have been detected in O'Neal Canyon and throughout the unnamed drainage, and both bobcat and mountain lion have been detected in these locations, as well.

The eastern portion of the site contains numerous unnamed drainages in the foothills of the San Ysidro Mountains. Habitat in this area retains a high wildlife value. The coastal sage scrub contains several gnatcatcher territories, and signs of wildlife movement through the drainages from the foothills to high into the San Ysidro Mountains have been detected. This area has the largest interface with the BLM open space bordering the site to the east.

#### **Plants**

Plant species are designated as sensitive because of their overall rarity, endangerment, unique habitat requirements, and/or restricted distribution. In general, it is a combination of these factors that leads to a sensitivity designation. Sensitive plants include those listed by the U.S. Fish and Wildlife Services (USFWS 1990), California Department of Fish and Game (CDFG 1990b), and California Native Plant Society (CNPS) (Smith and Berg 1988). The CNPS listing is sanctioned by the CDFG and essentially serves as its list of "candidate" species for threatened or endangered status. Sensitive species detected onsite are discussed below and depicted in Plate 2 (map pocket). Detected and potentially-occurring sensitive plant species in the study area are included in Table 4.3-2. Definitions of the various listings are also included in Table 4.3-2. More detailed descriptions of the detected plant species are included in the Biological Technical Report.

Individual plant locations onsite are represented by letter code designations on the sensitive species map (Plate 1, map pocket). Each letter represents a point location and generally indicates one to many individuals. Polygons are also depicted for larger populations of sensitive plants or populations that cover a large areal extent. Historic plant locations (i.e., pre-1991 surveys) are indicated in lower-case letters, while upper-case letters denote 1991 findings.

#### **Animals**

Sensitive animal species are those listed by federal, state, and local agencies, as well as scientific organizations. The USFWS (1989, 1991) officially lists sensitive species as either threatened or endangered, or proposed for listing as threatened or endangered, and unofficially recognizes many other species as candidates for listing. Additional species (i.e., bald eagle, golden eagle) receive federal protection under the Bald Eagle Protection Act and the Migratory Bird Treaty Act and Convention for the Protection of Migratory Birds and Animals. The Migratory Bird Treaty Act (1916) between the United States and Canada, the Convention for the Protection of Migratory Birds and Animals (1936) between the United States and Mexico, and subsequent amendments to these acts provide legal protection for almost all breeding bird species occurring in the United States. These acts prohibit the killing, taking, collecting, and selling or purchasing of native bird species or their parts, nests, or eggs. Certain gamebird species are allowed to be hunted for specific periods determined by federal and state governments. There are also provisions for

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Table 4.3-2

DETECTED AND POTENTIALLY OCCURRING SENSITIVE PLANT SPECIES IN THE EAST OTAY MESA SPECIFIC PLAN AREA

Species	Status ¹	Habitat	Potential for Occurrence	
Acanthomintha ilicifolia (San Diego Thommint)	USFWS: Candidate (C1) CDPG: Endangered CNPS: List 1B, 3-3-2	Chaparral, coastal sage scrub, grassland; clay soils, below 300 m (984 ft).	Moderate. Reported from Otay Lakes (Beauchamp 1986) and Otay Ranch (Otay Ranch FEIR 1992a); not detected in any of the surveys done onsite.	
<i>Adolphia californica</i> (California Adolphia)	USFWS: None CDFG: None CNPS: List 2, 1-2-1	Chaparral, coastal sage scrub; dry slopes, below 300 m (984 ft).	None Shrub that would have been detectable during the survey periods.	
<i>Ambrosia pumila</i> (San Diego Ambrosia)	USFWS: Candidate (C2) CDFG: None CNPS: List 1B, 3-2-2	Grassland, riparian, or disturbed habitat; below 150 m (492 ft).	Moderate. Reported from Otay Valley (WESTEC 1986); could occur in disturbed or riparian areas onsite.	
Arctostaphylos otayensis (Otay Manzanita)	USFWS: Candidate (C2) CDFG: None CNPS: List 1B, 3-2-3	Chaparral; 1100 m (3609 ft).	Detected. Occurs in eastern portion of CSA, outside SPA boundary.	
Artemisia palmeri (San Diego Sagewort)	USFWS: None CDFG: None CNPS: List 2, 2-2-1	Riparian, coastal sage scrub; below 600 m (1969 ft).	Detected. Occurs in O'Neal Canyon, outside SPA boundary.	
Astragalus deanei (Deane's Milk-vetch)	USFWS: Candidate (C2) CDFG: None CNPS: List 1B, 3-2-3	Chaparral, coastal sage scrub; open areas, 250-350 m (820-1148 ft).	Low. Subshrub that would have been detectable during the survey periods.	
Bergerocactus emoryi (Golden-spined Cereus)	USFWS: None CDFG: None CNPS: List 2, 2-2-1	Cliffs or steep slopes in coastal scrub habitats along the coast; below 150 m (492 ft).	Detected. Five "clumps" observed in O'Neal Canyon in the northern portion of the SPA.	
Brodiaea orcuttii (Orcutt's Brodiaea)	USFWS: Candidate (C2) CDFG: None CNPS: List 1B, 1-3-2	Grassland and near vernal pools and streams; clay soils, below 1500 m (4922 ft).	Detected. Occurs in O'Neal Canyon, both within and north of SPA boundary.	

# Table 4.3-2 (Continued) DETECTED AND POTENTIALLY OCCURRING SENSITIVE PLANT SPECIES IN THE EAST OTAY MESA SPECIFIC PLAN AREA

	•		•	
Species	Status ¹	Habitat	Potential for Occurrence	
Calamagrostis densa (Dense Reed Grass)	USFWS: Candidate (C3c) CDFG: None CNPS: List 4, 1-1-2	Closed cone coniferous forest, chaparral, cismontane woodland; open areas and disturbed sites, often in gabbro soils, below 400 m (1312 ft). Reported from Otay Mountain (Beauchamp 1986).	Low. Perennial grass that would have been detectable during the survey periods.	
Calamintha chandleri (San Miguel Savory)	USFWS: Candidate (C3c) CDFG: None CNPS: List 4, 1-1-2	Chaparral; 500-750 m (1641-2461 ft). Reported from Otay Mountain (Beauchamp 1986).	Moderate. Small subshrub that could occur in chaparral in the eastern portion of the CSA; potential for occurrence in SPA is low.	
Calochortus dunnii (Dunn's Mariposa Lily)	USFWS: Candidate (C2) CDFG: Rare CNPS: List 1B, 2-2-2	Closed cone coniferous forest, chaparral; above 1000 m (3281 ft).	Detected. Historical location in SPA; observed beyond SPA boundary, in northeast portion of CSA.	
Caulanthus simulans (Payson's Jewelflower)	USFWS: Candidate (C2) CDFG: None CNPS: List 4, 1-2-3	Chaparral, coastal sage scrub; rocky places, below 1500 m (4922 ft).	Low. Would have been detectable during the survey period. Generally known to north and east of the site.	
Caulanthus stenocarpus (Slender-pod Jewelflower)	USFWS: Candidate (C2) CDFG: Rare CNPS: List 1B, 3-2-2	Chaparral; open slopes and burns, 300-900 m (984-2953 ft).	Low. Would have been detectable during the survey period. Generally known to north and east of the site.	
Chamaebatia australis (Southern Mountain Misery)	USFWS: None CDFG: None CNPS:: List 4, 1-1-1	Chaparral; 300-1050 m (984-3445 ft).	Detected. Occurs in dense stands below the Otay Mountain Truck Trail.	
Clarkia delicata (Delicate Clarkia)	USFWS: None CDFG: None CNPS: List 2, 1-2-1	Oak woodland understory; 150- 1300 m (492-4265 ft).	None. Suitable habitat lacking.	
Comarostaphylis diversifolia ssp. diversifolia (Summer-holly)	USFWS: Candidate (C2) CDFG: None CNPS: List 1B, 2-2-2	North-facing slopes in chaparral; below 700 m (2297 ft).	Low. Large shrub that would have been detectable during the survey periods.	

# Table 4.3-2 (Continued)

# DETECTED AND POTENTIALLY OCCURRING SENSITIVE PLANT SPECIES IN THE EAST OTAY MESA SPECIFIC PLAN AREA

Species	Status ¹	Habitat	Potential for Occurrence
Cordylanthus orcuttianus (Orcutt's Bird's-beak)	USFWS: Candidate (C2) CDPG: None CNPS: List 2, 3-3-1	Coastal sage scrub; dry slopes, 10-20 m (33-98 ft). Reported from Otay Mesa (Beauchamp 1986).	Low. Would have been detectable during the survey periods. Generally occurs west of the project site.
Cupressus forbesti (Tecate Cypress)	USFWS: Candidate (C2) CDFG: None CNPS: List 1B, 2-2-2	<b>Chaparral</b> ; 150-1100 m (492-3609 ft).	Detected. Occurs in intermittent drainages and on slopes in the eastern portion of the CSA (within and outside SPA).
Dichondra occidentalis (Western Dichondra)	USFWS: Candidate (C3c) CDFG: None CNPS: List 4, 1-2-1	Chaparral, coastal sage scrub; dry sandy banks, below 300 m (984 ft); often proliferates on recently burned slopes.	Detected. Occurs on slopes and mesas in the eastern portion of site (within and outside SPA).
Dudleya variegata (Variegated Dudleya)	USFWS: Candidate (C2) CDFG: None CNPS: List 4, 1-2-2	Chaparral, coastal sage scrub; dry hillsides and mesas, below 300 m (984 ft).	Detected. Scattered throughout much of the eastern portion of the site (within and outside the SPA), and on the mesa south of Johnson Canyon.
Ericameria palmeri ssp. palmeri (Palmer's Ericameria)	USFWS: Candidate (C2) CDPG: None CNPS: List 2, 2-2-1	Coastal sage scrub; dry valleys and plains, below 200 m (656 ft).	Detected. One individual occurs in the northern portion of the site, along the Otay River (outside SPA boundary).
Eryngium aristulatum var. parishil (San Diego Button-celery)	USFWS: Endangered CDPG: Endangered CNPS: List 1B, 1-3-2	Vernal pools, grassland; 20-150 m (66-492 ft).	Detected. Occurs in J22 and J26 vernal pool complexes; high potential to occur in vernal pool-mima mound habitat near U.SMexican border.
Ferocactus viridescens (San Diego Barrel Cactus)	USFWS: Candidate (C2) CDPG: None CNPS: List 2, 1-3-1	Chaparral, coastal sage scrub, grassland; dry slopes, below 1500 m (4922 ft).	Detected. Scattered throughout the site on lower slopes and mesas.
Fremontodendron mexicanum (Mexican Flannelbush)	USFWS: Candidate (C2) CDPG: Rare CNPS: List 1B, 3-2-2	Southern interior cypress forest, chaparral, drainages; shaded canyons, 300-900 m (984-2953 ft). Reported from Otay Mountain (Beauchamp 1986).	Low. Shrub that would have been detectable during the survey periods.

# Table 4.3-2 (Continued)

# DETECTED AND POTENTIALLY OCCURRING SENSITIVE PLANT SPECIES IN THE EAST OTAY MESA SPECIFIC PLAN AREA

Species	Status ¹	Habitat	Potential for Occurrence  Moderate. Inconspicuous subshrub; could occur in chaparral or coastal sage scrub onsite.	
Haplopappus junceus (Rush-like Bristleweed)	USFWS: None CDFG: None CNPS: List 4, 1-1-1	Chaparral, coastal sage scrub; dry hillsides, 300-800 m (984-2625 ft).		
Harpagonella palmeri var. palmeri (Palmer's Grapplinghook)	USFWS: None CDFG: None CNPS: List 2, 1-2-1	Chaparral, coastal sage scrub, grassland; open slopes and burns in clay soils, below 1000 m (3281 ft).	Detected. Occurs on slopes and mesas in the northern part of the CSA (outside the SPA boundary).	
Hemizonia conjugens (Otay Tarplant)	USFWS: Candidate (C2) CDFG: Endangered CNPS: List 1B, 3-3-2	Coastal sage scrub; clay slopes and mesas, below 100 m (328 ft).	Detected. One extant location in SPA, along U.SMexican border.	
Iva hayesiana (San Diego Marsh Elder)	USFWS: Candidate (C2) CDFG: None CNPS: List 2, 2-2-1	Moist or alkaline places, below 200 m (656 ft).	Detected. Common in drainages throughout the site.	
Juncus acutus var. sphaerocarpus (Spiny Rush)	USFWS: None CDFG: None CNPS: List 4, 1-2-2	Moist saline or alkaline places, below 900 m (2953 ft).	Detected. Common in drainages throughout the site.	
Lathyrus splendens (Pride-of-California)	USFWS: None CDFG: None CNPS: List 4, 1-1-2	Chaparral; 400-900 m (1312-2953 ft).	Low. Could occur in chaparral in the eastern portion of the CSA; however, generally found to the east of the site.	
Lepechinia ganderi (Gander's Pitcher Sage)	USFWS: Candidate (C2) CDFG: None CNPS: List 1B, 3-1-2	Chaparral; 500-1060 m (1641-3478 ft). Type locality from Otay Mountain (Beauchamp 1986).	Detected. Occurs along the Otay Mountain Truck Trail, in the eastern portion of the CSA (outside the SPA boundary).	
Lotus crassifolius var. otayensis (Otay Mountain Lotus)	USFWS: None CDFG: None CNPS: List 1B, 3-1-3	Chaparral; 900 m (2953 ft). Known only from Otay Mountain (Beauchamp 1986; Jepson 1993).	Moderate. Could potentially occur in chaparral in the eastern portion of the CSA (i.e., along the Otay Mountain Truck Trail).	

# DETECTED AND POTENTIALLY OCCURRING SENSITIVE PLANT SPECIES IN THE EAST OTAY MESA SPECIFIC PLAN AREA

Species	Status ¹	Habitat	Potential for Occurrence
Mimulus clevelandii (Cleveland's Bush Monkeyflower)	USFWS: None CDFG: None CNPS: List 4, 1-1-2	Chaparral, disturbed places; dry places, below 1000 m (3281 ft). Reported from Otay Mountain (Beauchamp 1986).	Low. Subshrub that would have been detectable during the survey periods.
Monardella hypoleuca ssp. lanata (Felt-leaved Monardella)	USFWS: Candidate (C3c) CDFG: None CNPS: List 1B, 3-1-2	Chaparral; 300-1000 m (984-3281 ft). Reported from Otay Mountain (Beauchamp 1986).	Low. Subshrub that would have been detectable during the survey periods.
Monardella linoides asp. viminea (Willowy Monardella)	USFWS: Candidate (C2) CDFG: Endangered CNPS: List 1B, 2-2-2	Canyons, washes; below 200 m (656 ft).	Low. Subshrub that would have been detectable during the survey periods.
Muilla clevelandii (San Diego Goldenstar)	USFWS: Candidate (C2) CDFG: None CNPS: List 1B, 2-2-2	Chaparral, coastal sage scrub, grassland, around vernal pools; mesas and slopes, below 150 m (492 ft).	Detected. Scattered on lower slopes in the central portion of the site (within and outside the SPA).
Myosurus minimus asp. apus (Little Mousetail)	USFWS: Candidate (C2) CDFG: None CNPS: List 3, 2-3-2	Vernal pools; below 150 m (492 ft).	Detected. Found in vernal pools along U.SMexican border in an unrelated study (Ogden in prep.)
Navarretia fossalis (Prostrate Navarretia)	USFWS: Candidate (C2) CDFG: None CNPS: List 1B, 2-3-2	Vernal pools and ditches; below 900 m (2953 ft).	Detected. Small population in J22 vernal pool complex, on mesa south of Johnson Canyon.
Ophloglossum lusitanicum ssp. californicum (California Adder's-tongue Fern)	USFWS: None CDFG: None CNPS: List 4, 1-2-2	Grassy slopes and around vernal pools; below 900 m (2953 ft).	Moderate. Could occur in or around vernal pools onsite.
Opuntia parryi var. serpentina (Snake Cholla)	USFWS: Candidate (C2) CDFG: None CNPS: List 1B, 3-3-2	Chaparral, coastal sage scrub; generally found on dry slopes near the coast.	Low. Substrub that would have been detectable during the survey period.
Orcuttia california (California Orcutt Grass)	USFWS: Proposed CDFG: Endangered CNPS: List 1B, 2-3-2	Vernal pools. Known from Otay Mesa (Beauchamp 1986).	Moderate. Could occur in vernal pools onsite.

# DETECTED AND POTENTIALLY OCCURRING SENSITIVE PLANT SPECIES IN THE EAST OTAY MESA SPECIFIC PLAN AREA

Species	Status ¹	Habitat	Potential for Occurrence
Physalis greenei (Greene's Ground-cherry)	USFWS: None CDFG: None CNPS: List 3, ?-?-?	Coastal sage scrub; moist areas below 300 m (984 ft).	Detected. Small population occurs in O'Neal Canyon, in eastern portion of CSA (outside SPA boundary).
Pickeringia montana ssp. tomentosa (Chaparral-pea)	USFWS: None CDFG: None CNPS: None	Chaparral; 200-1100 m (656-3609 ft). Reported from Otay Mountain (Beauchamp 1986).	Moderate. Could occur in vicinity of Otay Mountain Truck Trail, in eastern portion of CSA.
Pogogyne nudiuscula (Otay Mesa Mint)	USFWS: Endangered CDFG: Endangered CNPS: List 1B, 3-3-2	Vernal pools; below 150 m (492 ft).	Detected. Occurs in J26 vernal pool complex, in northern portion of CSA (outside SPA boundary).
Polygala cornuta ssp. fishiae (Fish's Milkwort)	USFWS: None CDFG: None CNPS: List 4, 1-1-2	Chaparral, oak woodland; shaded rocky places in canyons, 200-900 m (659-2953 ft). Reported from Otay Mountain (Beauchamp 1986).	Low. Vine that would have been detectable during the survey periods.
Quercus dumosa (Nuttali's Scrub Oak)	USFWS: Candidate (C2) CDFG: None CNPS: None	Chaparral, coastal sage scrub; generally sandy soils (sandstone) near coast, below 200 m (656 ft).	Low. This newly circumscribed taxon presumably has a restricted distribution along the coast.
Quercus engelmannii (Engelmann Oak)	USFWS: None CDFG: None CNPS: List 4, 1-2-2	Oak woodland; canyons and open slopes, below 1300 m (4265 ft).	None. Tree that would have been detectable during the survey periods.
Romneya coulteri (Coulter's Matilija Poppy)	USFWS: None CDFG: None CNPS: List 4, 1-1-3	Coastal sage scrub; slopes and creek beds, below 1050 m (3445 ft).	Detected. Occurs in O'Neal Canyon (outside SPA boundary) and along and the Otay Mountain Truck Trail and slopes to the west (inside and outside the SPA).
Rosa minutifolia (Small-leaved Rose)	USFWS: None CDFG: Endangered CNPS: List 2, 3-3-1	Coastal sage scrub; 170 m (558 ft). One known location in the U.S., on Otay Mesa (Beauchamp 1986).	Low. Shrub that would have been detectable during the survey periods.

# DETECTED AND POTENTIALLY OCCURRING SENSITIVE PLANT SPECIES IN THE EAST OTAY MESA SPECIFIC PLAN AREA

Species	Status ¹	Habitat	Potential for Occurrence
Salvia munzii (Munz's Sage)	USFWS: None CDFG: None CNPS: List 2, 2-2-1	Coastal sage scrub; below 500 m (1641 ft).	Detected. Locally common on slopes in the northeast and east-central corners of the CSA
Selaginella cinerascens (Mesa Clubmoss)	USFWS: None CDFG: None CNPS: List 4, 1-2-1	Coastal sage scrub; flat mesas or slopes.	Detected. Locally common on lower slopes and mesas throughout the CSA (inside and outside the SPA).
Solanum tenuilobatum (Narrow-leaved Nightshade)	USFWS: Candidate (C2) CDFG: None CNPS: List 1B, 3-1-3	Chaparral; 200-1100 m (659-3609 ft). Reported from Otay Mountain (Beauchamp 1986).	Moderate. Subshrub that could occur in chaparral in the eastern portion of the CSA.
Stipa diegoensis (San Diego County Needlegrass)	USFWS: None CDFG: None CNPS: List 2, 3-1-1	Vernal streams and clay slopes; 300-700 m (984-2297 ft).	Detected. Locally common along drainages and slopes in the eastern portion of the CSA (inside and outside the SPA).
Viguiera laciniata (San Diego County Viguiera)	USFWS: None CDFG: None CNPS: List 2, 1-2-1	Chaparral, coastal sage scrub; open slopes, below 400 m (1312 ft).	Detected. Locally common on south- facing slopes in the northeast portion of the CSA.

# DETECTED AND POTENTIALLY OCCURRING SENSITIVE PLANT SPECIES IN THE EAST OTAY MESA SPECIFIC PLAN AREA

## 1 Sensitivity Status Designations:

USFWS = U.S. Fish and Wildlife Service (1990).

CDFG = California Department of Fish and Game (1992b).

CNPS = California Native Plant Society (Smith and Berg 1988).

### Federal Candidate Species Designations

C1 = USFWS has sufficient biological information to support a proposal to list as threatened or endangered

C2 = Taxe for which existing information may warrant listing, but for which substantial biological data to support a proposed rule are lacking

C3c = Too widespread and/or not threatened

### **CNPS** Lists

List 1 = Plants of highest priority

1A = Plants presumed extinct in California

1B = Plants rare and endangered in California and elsewhere.

List 2 = Plants rare and endangered in California, but common elsewhere

List 3 = Plant about which we need more information

List 4 = Plants of limited distribution (a watch list)

## CNPS R-E-D Code

#### R (Rarity)

- Rare, but found in sufficient numbers and distributed widely enough that the potential for extinction or extirpation is low at this time.
- 2 = Occurrence confined to several populations or to one extended population.
- 3 = Occurrence limited to one or a few highly restricted populations, or present in such numbers that it is seldom reported.
- = Rarity unknown.

### E (Endangerment)

- 1 = Not endangered.
- 2 = Endangered in a portion of its range.
- 3 = Endangered throughout its range.
- ? = Rarity unknown.

#### D (Distribution)

- 1 = More or less widespread outside California.
- 2 = Rare outside California.
- 3 = Endemic to California.
- ? = Rarity unknown.

collecting birds for scientific purposes, and for controlling birds that cause damage to agricultural or other interests. Introduced species such as house sparrow and European starling are not protected by these laws.

The CDFG also lists species as threatened or endangered, or candidates for listing as threatened or endangered. Lower sensitivity animals may be listed as "species of special concern" (Remsen 1978; Williams 1986; CDFG 1991, 1992). The CDFG further classifies some species under the following categories: "fully protected," "protected furbearer," "harvest species," "protected amphibian," and "protected reptile." The designation "protected" indicates that a species may not be taken or possessed except under special permit from the CDFG; "fully protected" indicates that a species can be taken only for scientific purposes. The designation "harvest species" indicates that take of the species is controlled by the state government.

Only one of the animal species observed or expected onsite is listed as endangered or threatened by the USFWS (1991, 1993) or the CDFG (1991). The California gnatcatcher was recently listed as threatened by the USFWS. This species and other animals detected or reasonably likely to occur onsite are discussed below. Detected and potentially occurring animal species are summarized in Table 4.3-3.

Individual animal locations for most of the species detected onsite are represented by letter code designations on the sensitive animal species map (Plate 2, map pocket). Each letter represents a sighting and generally indicates one or a pair of individuals. The focused gnatcatcher surveys generated siting information. Historic animal locations (i.e., pre-1991 surveys) are indicated in lower-case letters, while upper-case letters denote 1991 findings.

Invertebrates. No sensitive species of invertebrates were detected in the East Otay Mesa project area. However, six sensitive species have a reasonable likelihood of occurring onsite: Riverside fairy shrimp (Streptocephalus woottoni), vernal pool fairy shrimp (Branchinecta sandiegensis), Hermes copper butterfly (Lycaena hermes), Wright's checkerspot butterfly (Euphydryas editha quino), Thorne's hairstreak (Mitoura thornei), and Harbison's dun skipper (Euphyes vestris harbisoni).

<u>Amphibians</u>. One sensitive amphibian species, western spadefoot toad, was detected onsite. One other species, arroyo southwestern toad (*Bufo microscaphus californicus*), could potentially occur onsite.

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Table 4.3-3

DETECTED AND POTENTIALLY OCCURRING SENSITIVE WILDLIFE SPECIES IN THE EAST OTAY MESA SPECIFIC PLAN AREA

Species	Status ¹	Potential for Occurrence
nvertebrates		
Streptocephalus woottoni Riverside Fairy Shrimp)	E//	Potentially occurring in vernal pools.
Branchinecta sandiegensis Vernal Pool Fairy Shrimp)	PPE//	Potentially occurring in vernal pools.
Lycaena hermes Hermes Copper Butterfly)	C2//	Potentially occurring in coastal sage scrub or chaparral with redberry.
Euphydryas editha quino (Wright's Checkerspot Butterfly)	C1//	Potentially occurring around vernal pools onsite and other areas supporting the host plant, 'plantain.
Mitoura thornei Thome's Hairstreak)	C2//	Potentially occurring in association with tecate cypress.
Euphyes vestris harbisoni (Harbison's Dun Skipper)	C2//	Potentially occurring near seeps and intermittent drainages supporting the host plant, San Diego sedge.
Amphibians and Reptiles		
Scaphiopus hammondii (Western Spadefoot Toad)	/CSC/	Detected onsite in a cattle pond; potentially occurring in vernal pools, temporary ponds, and coastal sage scrub.
Bufo microscaphus californicus Arroyo Southwestern Toad)	C2/CSC/	Potentially occurring in Otay River, tributary to Otay River, or O'Neal Canyon.

# DETECTED AND POTENTIALLY OCCURRING SENSITIVE WILDLIFE SPECIES IN THE EAST OTAY MESA SPECIFIC PLAN AREA

Species	Status ¹	Potential for Occurrence
Clemmys marmorata pallida (Southwestern Pond Turtle)	C1/CSC/SDHS	Potentially occurring in Otay River and O'Neal Canyon.
Eumeces skiltonianus interparietalis (Coronado Island Skink)	C2/CSC/	Potentially occurring throughout native and naturalized habitats onsite, particularly in moist areas.
Coleonyx variegatus abbotti (San Diego Banded Gecko)	C2//SDHS	Potentially occurring in the larger rock outcrops onsite.
Phrynosoma coronatum blainvillei (San Diego Horned Lizard)	C2/CSC/SDHS	Detected onsite around O'Neal Canyon, the east ern foothills, and near the Otay Mountain Truck Trail.
Cnemidophorus tigris multiscutatus (Coastal Western Whiptail)	C2//	Detected onsite in scrub and chaparral habitats.
Cnemidophorus hyperythrus beldingi (Orange-throated Whiptail)	C2/SCS/SDHS	Detected in the eastern portion of the CSA, along the Otay Mountain Truck Trail.
Lichanura trivirgata roseofusca (Coastal Rosy Boa)	C2/P/	Detected onsite near the Kuebler Ranch and in a drainage in the southeast corner of the SPA.
Thamnophis hammondii (Two-striped Garter Snake)	C2//SDHS	Detected onsite in rock pools along O'Neal Canyon and in the north-south oriented tributary to Otay River.
Anniella nigra argenta (Silvery Legless Lizard)	/CSC/SDHS	Potentially occurring in drainages and washes.

# Table 4.3-3 (Continued) DETECTED AND POTENTIALLY OCCURRING SENSITIVE WILDLIFE SPECIES IN THE EAST OTAY MESA SPECIFIC PLAN AREA

Species	Status ¹	Potential for Occurrence
Diadophis punctatus similis (San Diego Ringneck Snake)	C2//	Potentially occurring in native and naturalized habitats onsite, particularly in moist areas.
Salvadora hexalepis virgultea (Coast Patch-nosed Snake)	C2/CSC/	Potentially occurring in native habitats and agricultural fields.
Crotalus ruber ruber (Northern Red Diamond Rattlesnake)	C2/CSC/	Detected onsite in O'Neal Canyon.
Birds		
Polioptila californica (California Gnatcatcher)	T/CSC/	Detected throughout coastal sage scrub onsite.
Polioptila caerulea amoenissima (Blue-gray Gnatcatcher)	//EV	Detected foraging in coastal sage scrub onsite.
Amphispiza belli belli (Bell's Sage Sparrow)	C2//	Detected onsite.
Aimophila ruficeps canescens (Southern California Rufous-crowned Sparrow)	C2//	Detected throughout coastal sage scrub and chaparral onsite.
Ammodramus savannarum perpallidus (Grasshopper Sparrow)	//EV	Potentially occurring in grassland areas onsite Historically occurring west of the Kuebler Ranch.
Campylorhynchus brunneicapillus (Coastal Cactus Wren)	PE,C2/CSC/EV	None. Suitable nesting habitat (cactus patches lacking.

# DETECTED AND POTENTIALLY OCCURRING SENSITIVE WILDLIFE SPECIES IN THE EAST OTAY MESA SPECIFIC PLAN AREA

Species	Status ¹	Potential for Occurrence
Eremophila alpestris actia (California Horned Lark)	C2//	Detected onsite.
Lanius ludovicianus (Loggerhead Shrike)	C2//	Detected onsite near Keubler Ranch and along the border.
Agelaius tricolor (Tricolored Blackbird)	C2/PE, CSC/	Potentially occurring in the western portion of the site.
Elanus caeruleus majusculus (Black-shouldered Kite)	/FP, CSC/	Detected foraging onsite.
Circus cyaneus hudsonius (Northern Harrier)	PM/CSC/EV	Detected foraging onsite.
Accipiter cooperii (Cooper's Hawk)	/CSC/BL	Detected foraging onsite.
Accipiter striatus velox (Sharp-shinned Hawk)	/CSC/BL	Potentially occurring as a winter visitor in agricultural and scrub habitats onsite.
Buteo regalis (Ferruginous Hawk)	C2/CSC/	Potentially occurring onsite as an occasional winter visitor.
Aquila chrysaetos canadensis (Golden Eagle)	BEPA/FP,CSC/	Detected foraging and roosting onsite.
Falco columbarius (Merlin)	/CSC/	Potentially occurring onsite only on a rare or occasional basis.

Table 4.3-3 (Continued)

DETECTED AND POTENTIALLY OCCURRING SENSITIVE WILDLIFE SPECIES IN THE EAST OTAY MESA SPECIFIC PLAN AREA

Species	Status ¹	Potential for Occurrence	
Falco mexicanus (Prairie Falcon)	/CSC/	Potentially occurring onsite; could use site for foraging on an occasional basis.	
Speotyto cunicularia hypugaea (Burrowing Owl)	PM/CSC/EV	Detected onsite in the southeast corner of the SPA and along the border.	
Asio otus wilsonianus (Long-eared Owl)	/CSC/	Potentially occurring onsite in winter; could use trees as roosts or hunting perches.	
Mammals			
Eumops perotis californicus (California Mastiff Bat)	C2/CSC/	Potentially foraging and roosting onsite.	
Plecotus townsendii pallescens (Pale Big-cared Bat)	C2/CSC/	Potentially occurring as a foraging species onsite.	
Macrotus californicus (California Leaf-nosed Bat)	C2/CSC/	Potentially occurring as a foraging species onsite.	
Lepus californicus bennetti (San Diego Black-tailed Jackrabbit)	C2//	Potentially occurring in open scrub habitats onsite.	
Perognathus longimembris pacificus (Pacific Little Pocket Mouse)	C2/CSC/	Potentially occurring onsite in scrub habitat associated with the Otay River, or O'Neal or Johnson Canyons.	
Perognathus californicus femoralis (Dulzura California Pocket Mouse)	C2//	Potentially occurring in scrub habitats onsite.	

# Table 4.3-3 (Continued) DETECTED AND POTENTIALLY OCCURRING SENSITIVE WILDLIFE SPECIES IN THE EAST OTAY MESA SPECIFIC PLAN AREA

Species	Status ¹	Potential for Occurrence
Perognathus fallax fallax (Northwestern San Diego Pocket Mouse)	C2//	Potentially occurring in sage scrub and grassland habitats onsite.
Onychomys torridus ramona (Southern Grasshopper Mouse)	C2//	Potentially occurring in scrub and riparian habitats onsite.
Neotoma lepida intermedia (San Diego Desert Woodrat)	C2//	Potential for occurrence onsite is low due to lack of suitable nesting habitat.
Taxidea taxus jeffersoni (American Badger)	/CSC,HS/	Potential for occurrence onsite is low due to human presence and lack of detectable sign.
Bassariscus astutus (Ringtail)	/FPF/	Potential for occurrence on most of the site is low due to lack of permanent water; if present, would most likely be associated with the Otay River, or O'Neal or Johnson Canyons.
Felis concolor (Mountain Lion)	/HS/	Detected onsite at the bridge across O'Neal Canyon.
Odocoileus hemionus (Mule Deer)	/HS/	Detected onsite only in O'Neal Canyon area.

# DETECTED AND POTENTIALLY OCCURRING SENSITIVE WILDLIFE SPECIES IN THE EAST OTAY MESA SPECIFIC PLAN AREA

# ¹Sensitivity Status:

## Federal (U.S. Fish and Wildlife Service).

E = Endangered; T = Threatened; PE = Proposed for federal listing as endangered; PPE = Petition in preparation for proposal for federal listing as endangered; C1 = Candidate (Category 1) for federal listing; C2 = Candidate (Category 2) for federal listing; BEPA = Bald Eagle Protection Act; FP = Fully Protected; PM = Protected by the Migratory Bird Treaty Act.

## State (California Department of Fish and Game).

E = Endangered; T = Threatened; CSC = Species of Special Concern; FP = Fully Protected; FPF = Fully Protected Furbearer; HS = Harvest Species.

## Other.

BL = Audubon Society's Blue List; EV = Everett; SDHS = San Diego Herpetological Society

<u>Reptiles</u>. Six sensitive reptile species were detected in the study area: San Diego horned lizard, coastal western whiptail, orange-throated whiptail, coastal rosy boa, two-striped garter snake, and northern red diamond rattlesnake. Additional sensitive reptiles that could occur onsite include southwestern pond turtle, Coronado Island skink, San Diego banded gecko, silvery legless lizard, San Diego ringneck snake (*Diadophis punctatus similis*), and coast patch-nosed snake (*Salvadora hexalepis virgultea*).

Birds. Several sensitive bird species were detected onsite, and additional sensitive birds are considered potentially occurring. Detected species with the highest sensitivity include the federally threatened songbird, California gnatcatcher, and golden eagle (Aquila chrysaetos canadensis). Other detected species include blue-gray gnatcatcher (Polioptila caerulea amoenissima), Bell's sage sparrow (Amphispiza belli belli), southern California rufous-crowned sparrow (Aimophila ruficeps canescens), loggerhead shrike (Lanius ludovicianus), black-shouldered kite (Elanus caeruleus majusculus), northern harrier, Cooper's hawk (Accipiter cooperi), and burrowing owl (Athene cunicularia hypugaea). Detected and potentially occurring sensitive bird species are discussed below. One additional sensitive bird species, cactus wren (Campylorhynchus brunneicapillus), is known from the Otay Mesa area but onsite suitable habitat is lacking. Likewise, breeding riparian bird species are not expected onsite due to the lack of suitable habitat. Due to its threatened status, the California gnatcatcher is discussed in greater detail below. The golden eagle is also discussed.

Birds of prey detected onsite include black-shouldered kite (Elanus caeruleus majusculus), northern harrier (Circus cyaneus hudsonius), Cooper's hawk (Accipiter cooperii), and the golden eagle (Aquila chrysaetos canadensis). Other birds that may occur onsite and were detected in the vicinity include tri-colored blackbird (Agelaius tricolor), sharp-shinned hawk (Accipiter striatus velox), and ferruginous hawk (Buteo regalis).

# Polioptila californica

## California Gnatcatcher

The United States California gnatcatcher population is estimated between 1800 and 2300 pairs with less than 1000 pairs remaining in San Diego County (Atwood 1992; USFWS 1991). The primary cause of this species' decline is the cumulative loss of coastal sage scrub vegetation to urban and agricultural development. Little of this species' habitat is formally protected or managed. This species is probably extirpated from Ventura and San

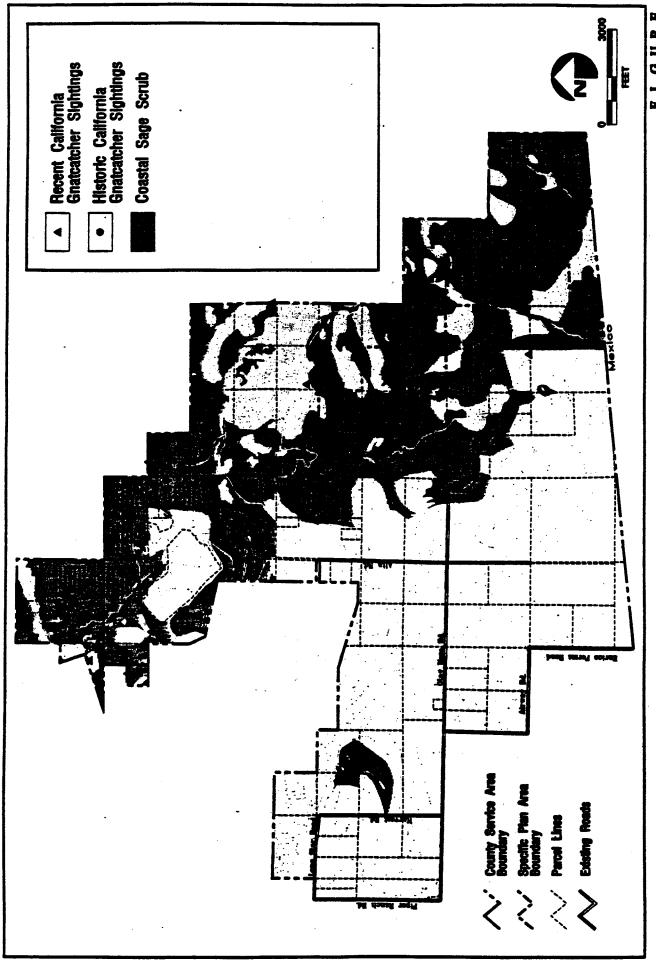
Bernardino counties and is declining proportionately with the continued loss of coastal sage scrub habitat in the four remaining southern California counties located within the coastal plain. Initial studies suggest that the California gnatcatcher may be highly sensitive to the effects of habitat fragmentation and development activity (Atwood 1990; ERCE 1990b; Ogden unpub. data). Coastal sage scrub habitat has been reduced by 70 to 90 percent of its historical extent (USFWS 1991), and relatively little of what remains is protected in natural open space.

Focused surveys on the East Otay Mesa site detected an estimated 47 pairs of California gnatcatcher (Plate 1, map pocket; Figure 4.3-3). Results indicate that gnatcatchers are not evenly distributed throughout coastal sage scrub onsite. Rather, they occupy three primary areas: 1) O'Neal Canyon and the drainages north of the East Mesa Detention Facility, 2) the hills south of the Otay Mountain Truck Trail, and 3) a drainage in the easternmost portion of the study area.

The largest aggregation of California gnatcatchers (28 pairs) was detected throughout O'Neal Canyon and the drainages north of the East Mesa Detention Facility. An additional three pairs occur on upper elevation slopes adjacent to the Otay Mountain Truck Trail, while eight pairs are distributed throughout coastal sage scrub on the gently sloping hills and drainages south of the Otay Truck Trail. The third aggregation of California gnatcatchers occurs in the easternmost portion of the site. In this location, seven pairs were detected in coastal sage scrub adjacent to a drainage supporting southern interior cypress forest. The final pair of gnatcatchers occurs in the southeast corner of the site, and was observed in disturbed coastal sage scrub on a mesa.

In general, gnatcatchers onsite inhabit coastal sage scrub in drainages and at the foot of the mountains. Roughly 75 percent of the gnatcatchers were found on hills with less than 40 percent slopes. The gnatcatchers onsite showed no significant preference for shallow or steep slopes during the non-breeding season (i.e., when the data was collected). The majority of unoccupied coastal sage scrub is fairly steep and/or is disturbed by grazing, ORVs, or other man-caused disturbances.

The East Otay Mesa study area is an important population center for the California gnatcatcher, as evidenced by the presence of a large population and high-quality habitat in a relatively undeveloped area (Ogden 1992e). O'Neal Canyon provides a critical link between habitat onsite and in Otay Valley and the Otay Lakes area. Habitat along Otay



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Lakes provides a continuum of habitat which links the Otay region with the San Ysidro and Jamul mountains. This habitat interconnectivity allows for dispersal into different areas, and reduces the potential for habitat fragmentation and isolation of gnatcatcher populations.

## Aquila chrysaetos canadensis

## Golden Eagle

One pair of golden eagles was observed repeatedly over the course of the site surveys. The eagles were observed roosting on power poles and rock outcrops in the area. This indicates that the project area is a major foraging resource within the pair's territory. An historical nesting site was located just offsite in the Otay River Valley until it was displaced by the pipeline that now crosses the river at that location. An alternative nesting site for the territory could be located further east in the San Ysidro Mountains, away from human disturbance. Other eagle territories in the area, located north and east of the CSA (Ogden 1993c, unpub. data), and development to the south and west most likely constrain the territory of the pair observed onsite to the project area, the western end of the San Ysidro Mountains, and possibly, into Mexico to the east of the site.

Birds of prey as a group are considered sensitive because of loss of foraging areas, their vulnerability to human disturbance, low population densities, and their position at the top of the food chain. Several species were observed flying over the site and, presumably, forage there. Tall structures suitable for perching and nesting are uncommon onsite and those that are present are heavily used by raptors. Raptors were often observed utilizing power poles and transmission towers for these purposes, as well as the scattered clumps of eucalyptus trees in the area. Many of the larger rock outcrops in the foothills onsite are frequented by raptors, and show evidence (e.g., whitewash, deposits of pellets and small mammal bones) of extensive use. Species such as black-shouldered kite, northern harrier, and prairie falcon may have actually benefited from historical agricultural practices in the area. These practices have produced sizable patches of grassland that function as winter foraging habitat for the birds.

<u>Mammals</u>. Only two sensitive mammals were detected onsite: mountain lion and mule deer (*Odocoileus hemionus*). At least eleven other mammal species have some potential for occurrence onsite. The mountain lion and mule deer are discussed below.

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### Felis concolor

Mountain Lion (cougar, panther, puma, catamount)

Fairly recent documentation of the status of the mountain lion revealed a healthy and viable population in San Diego County (Sitton 1977). Although the mountain lion has no sensitivity status per the USFWS or CDFG, it is considered sensitive by the San Diego Non-game Wildlife Subcommittee for Vertebrates. There is presently a moratorium on mountain lion hunting. Mountain lions typically occur in remote, hilly, or mountainous areas. They require open water sources such as streams or rock pools, large foraging areas, and rocky shelters or caves for denning. Home ranges of mountain lions can cover areas as large as 40 to 154 square km (25 to 96 square miles) for males and 4.8-19.3 square km (3-12 square miles) for females with a typical minimum home range of 24 square km (15 square miles) per individual (Russell 1978; Hornocker 1970). Because of its large home range size, this species is susceptible to increased human pressures.

Mountain lion was detected at the bridge across O'Neal Canyon (Ogden 1992b). The territory of the individual detected probably includes the hilly eastern portion of the site. O'Neal Canyon would probably be the most important area of the site for mountain lions, because it links the large, undisturbed natural habitats (primarily, chaparral and scrub) of the San Ysidro Mountains to the water source and deer populations of the Otay River Valley. The remainder of the site would probably be of lesser value to the lions because it has limited drinking water resources and does not appear to support significant numbers of mule deer, the primary food item of mountain lions.

## Odocoileus hemionus

### Mule Deer

In California, mule deer occur throughout the state with the exception of the San Joaquin Valley and some southeastern desert areas. Most of the California population is migratory, moving to lower elevations in the fall. In San Diego County, however, mule deer are non-migratory and are found in most undeveloped areas with suitable habitat, including riparian and oak woodlands, coniferous forest, coastal sage scrub, and chaparral.

Deer populations can decline in response to fragmentation, degradation, or destruction of habitat. In fact, the biggest threat to local populations is illegal hunting and habitat destruction or fragmentation due to urbanization. Corridors may be instrumental in maintaining population continuity and allowing for the dispersal of juveniles. Although

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mule deer are distinctly wary of humans and human development, their tolerance is probably greater than that of the mountain lion; therefore, corridors designed to accommodate lions may serve deer, as well.

Deer tracks were detected onsite only in O'Neal Canyon (Ogden 1992b). The lack of deer in the remainder of the site may be attributed to the lack of year-round water, habitat degradation, poaching, and/or human presence.

A number of sensitive bat species inhabit southern San Diego County. The three species most likely to occur onsite are the California mastiff bat (Eumops perotis californicus), pale big-eared bat (Plecotus townsendii pallescens), and California leaf-nosed bat (Macrotus californicus). The type of focused surveys necessary for determining presence or absence of these species onsite was not performed; however, potential for occurrence (i.e., suitable roosting and foraging habitat) was noted.

## Important Biological Resource Areas

Biologically important resource areas are those areas that have been identified as supporting or potentially supporting sensitive biological resources (i.e., plants, animals, or habitats) and/or that are large enough in areal extent to support significant wildlife populations. The biological value of these areas is often increased and/or enhanced by proximity to protected open space areas. Important biological resource areas include Resource Conservation Areas (RCAs), parks, designated open space areas, and links between these important areas. The latter are discussed under wildlife corridors. Because the biological value of these areas has already been established and they have already been protected to some extent, they logically serve as a foundation for open space areas and wildlife corridors onsite.

Resource Conservation Areas (RCAs). Biologically sensitive resource areas are mapped and discussed in the Conservation Element of the San Diego County General Plan as RCAs (County of San Diego 1980). A biological RCA designation is applied to an area which supports sensitive biological resources such as sensitive habitats or plant or animal species; proposed development within or near a RCA should require more stringent review during the planning process. It should be noted, however, that RCAs only identify areas with known sensitive biological resources, and are to be used as a planning tool. Areas outside the RCA may also contain sensitive biological resources. A portion of one RCA occurs

within the study area; at least two other RCAs are in proximity to the project site, and many of the resources identified in these RCAs are also found onsite.

The Otay Mountain RCA includes Otay Mountain and lower Otay Reservoir. This RCA encompasses part of the CSA, including the eastern portion of the SPA. This RCA is considered of statewide significance, primarily for its populations of sensitive plant species. Otay Mountain is a major scenic landmark for the region, and portions of it (i.e., those areas under the BLM's jurisdiction) are under consideration as a wilderness area. In addition, the California Natural Area Coordinating Council designated Otay Mountain as a Significant Natural Area (County of San Diego 1980).

Otay Mountain is particularly important because it supports the world's largest stand of Tecate cypress. Other sensitive plants found on the mountain and in the study area include Otay manzanita, Orcutt's brodiaea, Dunn's mariposa lily, Gander's pitcher sage, and San Diego County needlegrass.

The Brown Field Old Bombing Range RCA and the Brown Field Area RCA were identified for vernal pools and several sensitive plant species. Both RCAs lie west of the project site.

Parks and Open Space. The most significant park area in the vicinity is the planned Otay River Valley Regional Park. A joint powers authority agreement has been executed by the County of San Diego and the cities of Chula Vista and San Diego to plan and acquire land for this major regional park. The focused planning area for this park is adjacent to the northern CSA boundary, and includes Johnson Canyon. This park would also include riparian habitat in the eastern portion of the Otay Valley near Otay Lake, and in Salt Creek. Lower Otay County Park is also in the project vicinity; this park occurs north of the site, at Otay Reservoir.

Open space occurs adjacent to the site to the northeast and east, on BLM-owned land on Otay Mountain. The BLM lands are part of two wilderness study areas (WSAs) known as the Western Otay Mountain WSA and the Southern Otay Mountain WSA. The WSA designation is given to lands meeting established criteria, i.e., undeveloped land areas in excess of 5000 acres that have unique or sensitive habitat (P. Kempenich 1991). The area east of the SPA is also part of the Otay Mountain National Cooperative Land and Wildlife Area, a designation that was established through a Public Land Order and that requires the

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joint management of the area by the BLM and the CDFG. The proposed Resource Management Plan for this area may allow for recreational use, including equestrian, camping, hiking, hunting, and motorized vehicle use (i.e., ORVs), among others. This area represents one of the most significant natural areas in the southwestern part of the county, and is an area of high botanical and wildlife value. Additional designated or planned open space occurs to the north, around Otay Reservoir and in the Otay River Valley (see above).

### Wildlife Corridors

The project area is at the southwestern edge of an extensive natural open space system which includes BLM-owned lands to the north and east, City of San Diego-owned lands around the Lower Otay Reservoir, and the Otay River Valley to the northwest. The San Ysidro Mountains to the east of the site are one of the largest continuous, undisturbed tracts of natural open space in southwestern San Diego County. In the U.S., most of this area is currently managed as a wilderness area by the BLM and has remained largely undisturbed. These mountains, including the foothills in the northeastern portion of the site, have been identified as a high priority core preserve area under the Multiple Species Conservation Program (MSCP) currently being developed as part of the City of San Diego's Clean Water Program (Ogden 1993b). The purpose of the MSCP is to develop a program principally designed for the conservation of federally endangered, threatened, or key candidate species and their habitats within the Metropolitan Sewerage System Services Area of the Clean Water Program. The MSCP will serve as mitigation for secondary impacts for the Clean Water Program. The MSCP habitat quality analysis is based on factors such as the potential to support sensitive plant and animal species, importance as a wildlife corridor or core habitat, amount of edge effect from surrounding land uses, and overall species diversity.

Lower Otay Reservoir to the north represents the major year-round water source in the area and is therefore important to large mammal species such as mule deer, which require daily watering. The reservoir is also important to species such as bobcat and mountain lion that require water on a regular basis and, therefore, require access to a permanent water source.

The Otay River Valley is a major linkage between the fragments of habitat remaining to the west of the site and the large areas of open space north and east of the site. Drainages such as Johnson and O'Neal canyons feed wildlife into the riverbed, which is largely

unconstrained from the Interstate-805 freeway to the Otay Dam. Tracking studies in the bottom of O'Neal Canyon showed use of this area as a movement corridor by species such as mule deer, bobcat, and mountain lion (Ogden 1992b).

The major areas of wildlife movement onsite are O'Neal Canyon, the drainage north of the East Mesa Detention Facility, and the ridge of the San Ysidro Mountains (i.e., vicinity of the Otay Mountain Truck Trail). O'Neal Canyon is a major linkage between the San Ysidro Mountains and the Otay River Valley. As mentioned above, the canyon is used by a number of large mammal species. The large population of California gnatcatchers utilizing habitat on the walls of the canyon suggest that the canyon is a viable breeding habitat for the gnatcatcher and other small species, as well as being a movement and dispersal corridor. While O'Neal Canyon is the major corridor resource in the region, the drainage north of the detention facility and the lower portion of Johnson Canyon sustain similar resources. Johnson Canyon is of somewhat lower value as a movement corridor because it terminates in open agricultural fields in the central portion of the site. Coastal sage scrub at the base of the foothills provides a north-south movement path for California gnatcatcher, while the ridgetops and various drainages provide natural, topographically-defined corridors for large mammals.

Constraints to wildlife movement exist in the southern and western portions of the site. To the south, the eastern suburbs of Tijuana and the newly constructed border wall block wildlife movement. North-south movement probably takes place east of the site where the San Ysidro Mountains cross the U.S.-Mexican border. Local movement of wildlife probably occurs between the mountains and the cattle ponds and rock pools in the southern portion of the site as water supplies dwindle during the dry season. The western portion of the site supports poor habitat for wildlife movement. The open agricultural fields provide little topographical or vegetative cover, and the region west and south of the Otay River is largely developed or otherwise constrained by human activity.

## 4.3.2 Impacts

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For the purpose of this analysis, a worst-case scenario was utilized to determine impacts. This scenario assumes complete development, or 100 percent impacts, to the entire SPA. While this assumption is valid for lands designated as Industrial, Commercial, Public, MTDB station, and rights-of-way, it may not be completely accurate for Hillside Residential. All of the Hillside Residential districts (and a small portion of the Industrial

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district) are proposed to be designated as a "G" Sensitive Resource Area (see Figure 3-4 in the Project Description). The "G" designator requires environmental review of proposed developments and allows for clustering of units to support sensitive areas. Under this designation, a proposed project within this zoning district must result in only minimal disturbance of environmentally sensitive lands. However, because no specific development plans showing potential residential areas and/or infrastructure are available for this analysis, all acreage within the Hillside Residential zoning district is also considered impacted. This allows identification of significant biological resources. The mitigation measures and recommendations provided in this EIR will assist in environmentally sensitive siting of development in the areas identified with a "G" Designator (e.g., clustering of development, restricted development "envelopes," etc.) to avoid or minimize impacts to significant biological resources.

In addition to direct impacts to biological resources within the zoning districts, this analysis also considers the relationship/effects of the SPA on offsite areas, including the remainder of the CSA.

The proposed project has the potential to produce three different types of project-related impacts: direct impacts, indirect impacts, and cumulative impacts. Direct impacts may be short- or long-term, and occur when biological resources are altered, destroyed, or removed during the course of project implementation (e.g., removal of vegetation for building pads and infrastructure; loss of individuals from habitat clearing and/or construction-related mortalities; loss of foraging, nesting, or burrowing habitat for wildlife species; and habitat disturbance that results in unfavorable substrate conditions to allow natural vegetative regeneration). Indirect impacts may also be short- or long-term, and occur when project-related activities affect, in an indirect manner, biological resources (e.g., an increase in human and domestic pet-related activity, noise, erosion, sedimentation, etc.).

Significance criteria used in this analysis are based on local interpretation, County (County of San Diego 1991), draft MSCP (Ogden 1993a), and CEQA guidelines, as well as guidelines provided in Nelson (1981).

In general, significant adverse impacts include:

Impacts to federal or state-listed species or habitats;

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

# **Vegetation Impacts**

Direct impacts to vegetation within the SPA could total approximately 3300 acres, or 100 percent of the available habitat if all of the Hillside Residential was disturbed (Figure 4.3-4). Table 4.3-4 provides a summary of impacts within the SPA for each vegetation type according to land use. Direct impacts account for approximately 63 percent of the habitat within the CSA.

In addition to the 3300 acres that could be impacted within the SPA, indirect impacts could also occur to additional habitat as a result of an increase in human and domestic pet use of the area, introduction of invasive, nonnative plant species, and other factors such as grading, changes in the hydrological regime leading to an increase or decrease in runoff, erosion, or sedimentation. Most of these indirect impacts are not quantifiable at this time; however, they are discussed qualitatively, as appropriate.

A number of projects are approved, proposed, and/or under consideration within the SPA. The international raceway, OHV park, landfill, and sewage sludge monofill, in particular, either will impact or have the potential to impact sensitive biological resources such as gnatcatchers and vernal pools. Vegetative associations that may not be considered significantly impacted on a project-specific basis (e.g., chaparral) could comprise a cumulatively significant impact on a regional scale.