

January 5, 2021

SCL-02

Ms. Fiona McKenna
SD Commercial, LLC
5440 Morehouse Drive, Suite 4000
Calimesa, CA 92320

Subject: Memorandum Update to the Noise Analysis for the East Otay Mesa Business Park Specific Plan Amendment

Dear Ms. McKenna:

The project description for the East Otay Mesa Business Park Specific Plan Amendment has been updated for clarification purposes and is as follows:

The Project is an amendment to the East Otay Mesa Business Park Specific Plan and does not involve any specific approvals or entitlements. Future discretionary permits will be required for any development proposals under the Specific Plan. The Project includes changes to land uses and specific plan road network, the land use matrix and development regulations, updates to reflect Caltrans acquisitions for State Route 11 and 125 and increases to the development footprint for the new Port of Entry (POE), and miscellaneous typographical and editorial updates to text, tables and figures. The Project results in the increase of land use designations by approximately 60.8 acres for Mixed-Use – Residential Emphasis, 209.8 acres for Heavy Industrial, 255.91 acres for Circulation Corridors. The Project results in the decrease of land use designations by approximately 53.12 acres for Mixed-Use – Employment Emphasis, 99.11 acres for Mixed Industrial, 107.34 acres for Light Industrial, and 266.94 acres for Technology Business Park.

The revision of acreage in the project description has been made to reflect reduction in future developable land within the Specific Plan Area due to land acquisitions by the California Department of Transportation (Caltrans) for the buildout of SR-125/SR-905/SR-11 interchange and the US/Mexico Port of Entry. Impacts to Air Quality, GHG, Noise, and Traffic related to development on Caltrans acquisition land have been separately analyzed.

A technical analysis for Noise was performed by HELIX Environmental Planning, Inc., on November 3, 2020. This analysis focused only on changes in land use proposed by the applicant team and did not include reductions in land acreage resulting from Caltrans acquisitions, thereby making the analysis more conservative than that of the full Project due to a larger amount of acreage being analyzed as

available for future development. The inclusion of this reduced development potential would further reduce Project impacts as those identified in the study. No further analysis is required.

Sincerely,



Jason Runyan
Noise Analyst

November 3, 2020

SCL-02

Ms. Fiona McKenna
SD Commercial, LLC
5440 Morehouse Drive, Suite 4000
Calimesa, CA 92320

Subject: Noise Analysis for the East Otay Mesa Business Park Specific Plan Amendment

Dear Ms. McKenna:

HELIX Environmental Planning, Inc. (HELIX) is submitting this letter to provide an assessment of potential noise impacts associated with the proposed change of land use designations within the East Otay Mesa Business Park Specific Plan (EOM SP) Amendment (SPA; Project). This letter analyzes changes between the EOM SP and the SPA.

BACKGROUND

The Project would involve several changes to the EOM SP. The original EOM SP and EIR were first approved on July 27, 1994 and has been amended nine times, most recently with SPA-15-001, which was approved on July 25, 2018. SPA-15-001 was evaluated in the Otay 250 Sunroad–East Otay Mesa Business Park Specific Plan Amendment EIR (State Clearinghouse No. 2016031028; County 2018).

The Project covers a portion of the 3,013-acre EOM SP, located in an unincorporated area in the southwestern portion of San Diego County, adjacent to the U.S./Mexico border (see Figure 1, *Regional Location*, and Figure 2, *Aerial Photograph of Project Vicinity*).

The Project is an SPA within the EOM SP. The SPA proposes: to re-designate 207.3 acres of Technology Business Park to Heavy Industrial uses (refer to Figure 3, *Project Components*); to re-designate 77.7 acres of Light Industrial to Mixed Industrial uses (refer to Figure 3); to re-designate 7.8 acres of Technology Business Park and 53.1 acres of Mixed Use – Employment Emphasis to Mixed Use – Residential Emphasis; the removal of David Ridge Road, from Vann Center Boulevard to Alta Road which would result in an additional 2.5 acres of developable land which will be subject to Heavy Industrial Land Use designation and an additional 2.5 acres of developable land which will be subject to Technology Business Park Land Use designation; changes to the Mixed Use – Residential Emphasis designation to allow for additional flexibility; changes to allowable uses within the Land Use Matrix, including the addition of new allowable uses, changing certain regulatory processes, and removing interim uses as a regulatory

process; changes to design regulations for certain uses, including removal of height restrictions, increasing floor area ratio and coverage (refer to Figure 3), reducing parking requirements, reducing lot sizes, and revised landscape requirements. As part of the proposed SPA, text, tables and figures will be updated to reflect current conditions in East Otay Mesa, as well as changes to the overall vision for the area. The Project proposes changes which would affect the entire EOM SP. The Project consists of approximately 3,013 acres and is located in the southwestern portion of San Diego County, immediately adjacent to the U.S./Mexico border. The Project is subject to the County's General Plan Regional Category Village and General Plan Land Use Designation Specific Plan Area. The Project area is assigned S-88 zoning, and is governed by the EOM SP.

NOISE TERMINOLOGY AND METRICS

All noise level or sound level values presented herein are expressed in terms of decibels (dB), with A-weighting (dBA) to approximate the hearing sensitivity of humans. Time-averaged noise levels are expressed by the symbol L_{EQ} , with a specified duration. The Community Noise Equivalent Level (CNEL) is a 24-hour average, where noise levels during the evening hours of 7:00 p.m. to 10:00 p.m. have an added 5 dBA weighting, and noise levels during the nighttime hours of 10:00 p.m. to 7:00 a.m. have an added 10 dBA weighting. Sound levels expressed in CNEL are always based on dBA. These metrics are used to express noise levels for both measurement and municipal regulations, as well as for land use guidelines and enforcement of noise ordinances.

As a general rule-of-thumb, the doubling of sound energy, or a change in 3 dBA or CNEL, would be considered a perceptible change to the average healthy human ear. For the purposes of this analysis, a 3 dBA or CNEL increase would be considered significant.

ANALYSIS OF PROPOSED CHANGE IN LAND USES

Construction Noise Analysis

Construction locations, activity types, and equipment associated with the Project's proposed changes in land use would not be substantially different from previous uses, and the construction noise impact conclusions of the original EIR and subsequent amendments would remain the same. As such, implementation of the project would not require additional mitigation and no new impacts are identified.

Operational Noise Analysis

Operational noise associated with the project would include stationary sources such as ventilation equipment and mobile sources such as loading and unloading operations for businesses within the SPA. Although the project would change 207.3 acres of Technology Business Park to Heavy Industrial, 77.7 acres of Light Industrial to Mixed Industrial, 7.8 acres of Technology Business Park and 53.1 acres of Mixed Use – Employment Emphasis to Mixed Use – Residential Emphasis, and would change the FAR for 80 acres of Mixed Industrial use, all zones would still be required to adhere to the limits defined in the County Noise Ordinance, which would not change. Implementation of the project would not require additional operational mitigation measures and no new impacts are identified.

Traffic Noise Analysis

Changes to the noise environment within the EOM SP would occur due to changes in traffic volumes along EOM SP roadways. The Project's proposed change from Technology Business Park and Mixed Use – Employment Emphasis to Mixed Use – Residential Emphasis would result in a decrease in traffic volumes, and this Project component is therefore not further considered as part of this analysis. The Project's proposed change from Technology Business Park use to Heavy Industrial use, change from Light Industrial use to Mixed Industrial use, and increase in floor area ratio of Mixed Industrial use has the potential to result in overall increased traffic volumes, and these three Project components are further considered in this analysis. The noise analysis is based on changes to traffic volumes from the project's Transportation Analysis prepared by Darnell & Associates, Inc. (2020). The Transportation Analysis defines the forecasted project traffic conditions for the year 2035 (Project 2035 Conditions). These traffic conditions were then analyzed against forecasted traffic volumes derived from the TIER II Traffic Study prepared for the EOM Port of Entry/State Route (SR) 11 project (No Project 2035 Conditions).

Roadway segments that were analyzed for traffic impacts in the Traffic Analysis and that would be affected by the proposed Project include segments along the following roadways:

- Lone Star Road
- Otay Mesa Road
- Airway Road
- Enrico Fermi Drive
- Siempre Viva Road
- Alta Road
- Sunroad Boulevard

Project noise impacts would be considered significant if the Project results in the exposure of any on- or off-site, existing, or reasonably foreseeable future NSLU to an increase of 3 CNEL over forecasted pre-existing noise.

Summary of Previously-Identified Impacts

1994 East Otay Mesa Specific Plan EIR

Mitigation for transportation noise within the 1994 East Otay Mesa Specific Plan EIR was general, with site-specific studies recommended for future projects. Aircraft noise mitigation avoided locating residential development where the projected noise contours for Brown Field exceeds 60 CNEL. Industrial/Commercial noise mitigation generally required thoughtful locating of uses based on compatibility, with site-specific studies recommended for future projects. Construction noise mitigation involves adherence to the San Diego County Noise Ordinance and special considerations where construction would occur within 1,500 feet of California gnatcatcher habitat.

2000 East Otay mesa Specific Plan Sunroad Centrum SEIR

Subsequent to adoption of the 1994 EIR, the 2000 SEIR was prepared for the Sunroad Centrum project. Because the Sunroad Centrum project would not propose any noise-sensitive uses within the areas that exceed the County's noise standards and wildlife species expected to occur within traffic-related noise areas would not be considered noise sensitive, no noise-related impacts would occur. No additional mitigation measures were required with the 2000 SEIR.

2012 Sunroad Otay Tech Centre Addendum

The 2012 Addendum concluded that, although noise sensitive land uses were proposed with the Sunroad Otay Tech Centre project, future projects would conduct site-specific noise analyses to determine mitigation necessary, if any, to make the noise levels consistent with the County Noise Element and County Noise Ordinance. Off-site direct and cumulative noise impacts to existing residences were considered less than significant and no mitigation is required.

Otay 250 Sunroad – East Otay Mesa Business Park Specific Plan Amendment

The 2018 Amendment involved a new Mixed-use village core area, including dwelling units for a portion of the SP area west of the Project. The Amendment's mitigation measures included site-specific analyses for future NSLU development and use-specific analyses for individual projects to ensure on-site operational noise does not exceed thresholds.

Analysis of Average Daily Traffic Volumes

The change in land uses proposed by the three Project components considered in this analysis would result in changes to daily traffic volumes on the seven roadways identified in the Traffic Analysis. Overall, these Project components would add 890 daily trips to area roadways. In addition, implementing the Project, including removing future development plans for the segment of David Ridge Road from Vann Center Boulevard to Alta Road, would redirect trips within the SPA. The Traffic Analysis therefore identified individual roadway segments upon which the average daily traffic (ADT) would change. Forecasted daily traffic volumes for the future segment of David Ridge Road to be removed were redistributed to adjacent roadways in the Traffic Analysis. The daily traffic volumes associated with the forecasted conditions without the Project (No Project 2035 Conditions) and the forecasted conditions with the three components of the SPA and removal of David Ridge Road from Vann Center Boulevard to Alta Road (Project 2035 Conditions) are shown in Table 1, *Comparison of Average Daily Traffic Volumes*.

Table 1
COMPARISON OF AVERAGE DAILY TRAFFIC VOLUMES

Road Name/Segment	Average Daily Traffic (ADT)		
	No Project 2035 Conditions	Project 2035 Conditions	Change
Lone Star Road			
East of State Route (SR) 125	37,900	37,900	0
West of Sunroad Boulevard	30,600	30,600	0
East of Sunroad Boulevard	24,000	24,100	+100
Sunroad Blvd to Vann Centre Blvd	28,600	28,600	0
Vann Centre Blvd to Enrico Fermi Dr	25,400	25,400	0
Enrico Fermi Dr to Alta Road	16,700	16,700	0
Alta Road to Paseo de la Fuente	9,200	9,200	0
Otay Mesa Road to Siempre Viva Road	11,700	11,700	0
Otay Mesa Road			
SR 125 to Harvest Road	16,700	16,700	0
Harvest Road to Sunroad Boulevard	14,000	14,000	0
Sunroad Blvd to Vann Centre Blvd	10,800	10,800	0
Vann Centre Blvd to Enrico Fermi Drive	8,800	8,000	-800
Enrico Fermi Drive to Alta Road	8,100	8,100	0
Alta Road to Lone Star Road	1,100	1,000	-100
Airway Road			
Paseo de las Americas to Enrico Fermi Drive	7,400	7,400	0
Enrico Fermi Drive to Alta Road	6,800	6,800	0
Enrico Fermi Drive			
Lone Star Road to Otay Mesa Road	21,200	21,200	0
Otay Mesa Road to SR 11	32,500	32,500	0
SR 11 to Airway Road	17,300	17,300	0
Airway Road to Siempre Viva Road	4,400	4,400	0
Siempre Viva Road			
SR 905 to Paseo de las Americas	51,400	51,400	0
Paseo de las Americas to Enrico Fermi Drive	18,200	18,200	0
Enrico Fermi Drive to Alta Road	11,100	11,100	0
Alta Road to SR 11 ¹	19,200	15,000	-4,200
SR 11 to Paseo de la Fuente	12,500	12,500	0
Alta Road			
North of Lone Star Road	11,900	11,900	0
Lone Star Road to Otay Mesa Road	7,900	7,900	0
Otay Mesa Road to Airway Road	6,100	6,100	0
Airway Road to Siempre Viva Road ¹	400	6,700	+6,300
Sunroad Boulevard			
South of Lone Star Road	6,800	6,800	0
North of Harvest Road	24,600	24,600	0

Source: Darnell & Associates 2020

Note: The average daily traffic volumes for the No Project 2035 Conditions are based on the Project Traffic Study's use of the Traffic Technical Report for the SR 11 and the Otay Mesa East Port of Entry project.

¹ The ADT changes to these roadways are largely due to the removal of a previously identified roadway segment. The removal of this segment (Airway Road from Alta Road to Siempre Viva Road) is an assumption and is not part of this project.

Most roadway segments except for the segment of Lone Star Road east of Sunroad Boulevard Alta Road from Airway Road to Siempre Viva Road would have no change or decreased average daily traffic volumes with the proposed Project when compared to the No Project 2035 conditions.

Analysis of Truck Volumes

Noise level changes are also determined by the breakdown of vehicle types along a roadway. Some larger vehicles, such as medium and heavy trucks, generate greater noise levels than a typical automobile. An increase in truck percentages may therefore increase noise levels, even if ADT remains the same. Truck percentages were calculated based on truck volumes provided in the Project's Traffic Study, as forecasted for 2035 conditions with and without the Project. Table 2, *Truck Volumes by Percent of Average Daily Traffic* presents the percentage of trucks on local roads.

Table 2
TRUCK VOLUMES BY PERCENT OF AVERAGE DAILY TRAFFIC

Road Name/Segment	Truck (Percentage of ADT)		
	No Project 2035 Conditions	Project 2035 Conditions	Change
Lone Star Road			
East of State Route (SR) 11	10	5	-5
West of Sunroad Blvd	10	10	0
East of Sunroad Blvd	12	12	0
Sunroad Blvd to Vann Centre Blvd	10	10	0
Vann Centre Blvd to Enrico Fermi Drive	10	10	0
Enrico Fermi Drive to Alta Road	11	11	0
Alta Road to Paseo de la Fuente	7	7	0
Otay Mesa Road to Siempre Viva Road	4	4	0
Otay Mesa Road			
SR 125 to Harvest Road	10	10	0
Harvest Road to Sunroad Blvd	10	10	0
Sunroad Blvd to Vann Centre Blvd	11	11	0
Vann Centre Blvd to Enrico Fermi Drive	14	14	0
Enrico Fermi Drive to Alta Road	12	12	0
Alta Road to Lone Star Road	10	10	0
Airway Road			
Paseo de las Americas to Enrico Fermi Drive	12	12	0
Enrico Fermi Drive to Alta Road	14	10	0
Enrico Fermi Drive			
Lone Star Road to Otay Mesa Road	12	12	0
Otay Mesa Road to SR 11	13	13	0
SR 11 to Airway Road	10	10	0
Airway Road to Siempre Viva Road	36	36	0
Siempre Viva Road			
SR 905 to Paseo de las Americas	12	12	0
Paseo de las Americas to Enrico Fermi Drive	16	16	0
Enrico Fermi Drive to Alta Road	10	10	0
Alta Road to SR 11	7	7	0
SR 11 to Paseo de la Fuente	8	5	-3

Table 2 (cont.)
TRUCK VOLUMES BY PERCENT OF AVERAGE DAILY TRAFFIC

Road Name/Segment	Truck (Percentage of ADT)		
	No Project 2035 Conditions	Project 2035 Conditions	Change
Alta Road			
North of Lone Star Road	10	10	0
Lone Star Road to Otay Mesa Road	11	11	0
Otay Mesa Road to Airway Road	11	11	0
Airway Road to Siempre Viva Road	2	2	
Sunroad Boulevard			
South of Lone Star Road	10	3	-7
North of Harvest Road	10	10	0

Source: Darnell & Associates 2020

ADT = average daily traffic; SR = State Route

As shown in Table 2, truck percentages would not change for most segments under Project 2035 Conditions. In three segments, the number of trucks would be reduced as compared to No Project 2035 Conditions. Therefore, the Project would not generate noise level increases solely due to changes in truck volumes.

Traffic Noise Impacts

As shown in Table 2, only two roadway segments would see an increase in traffic volumes over the 2035 conditions without the Project. Lone Star Road east of Sunroad Boulevard would see a relative increase by 100 vehicles, and Alta Road from Airway Road to Siempre Viva Road would see a relative increase by 6,300 vehicles. As a general rule, the doubling of a noise source would increase noise levels by approximately 3 CNEL. The segment of Lone Star Road east of Sunroad Boulevard is currently projected to support 24,000 vehicles without the Project. An increase of 100 vehicles over a given day along this segment would represent a negligible increase, and no noise impacts would occur.

The Project includes the removal of a segment of David Ridge Road between Vann Center Boulevard and Alta Road and assumes the removal of a segment of Airway Road between Alta Road and Siempre Viva Road. These segment removals would reroute projected traffic onto Alta Road, generating the increase of 6,300 ADT as described above. Although one of these segment removals (Airway Road) is not proposed as part of the Project, analysis of this total change of 6,300 ADT is provided. Noise levels associated with this change are shown in Table 3, *Alta Road Noise Level Changes*.

Table 3
ALTA ROAD NOISE LEVEL CHANGES

Road Name/Segment	Roadway Noise Levels at 50 feet (CNEL)		
	No Project 2035 Conditions	Project 2035 Conditions	Change
Alta Road			
Airway Road to Siempre Viva Road	56.8	69.1	+12.3

Source: TNM

CNEL = Community Noise Equivalent Level

Noise levels along this segment of Alta Road would increase by approximately 12 CNEL. No NSLUs are proposed for this segment. Land uses within this area of the EOM SP would involve industrial and office uses. According to the County General Plan Noise Element, noise levels of 70 CNEL would be acceptable for these uses, and noise levels of 75 CNEL would be conditionally compatible. Noise levels therefore would not exceed the noise compatibility standards for the land uses as defined by the County General Plan.

CONCLUSION

Implementation of the Project would continue to generate construction and operational noise within the SPA, but impacts would not be greater than what was previously analyzed for the EOM SP. The Project's generation of additional ADT on roadways within the SPA is not anticipated to increase noise levels. No new noise impacts were identified.

Sincerely,



Jason Runyan
Noise Analyst



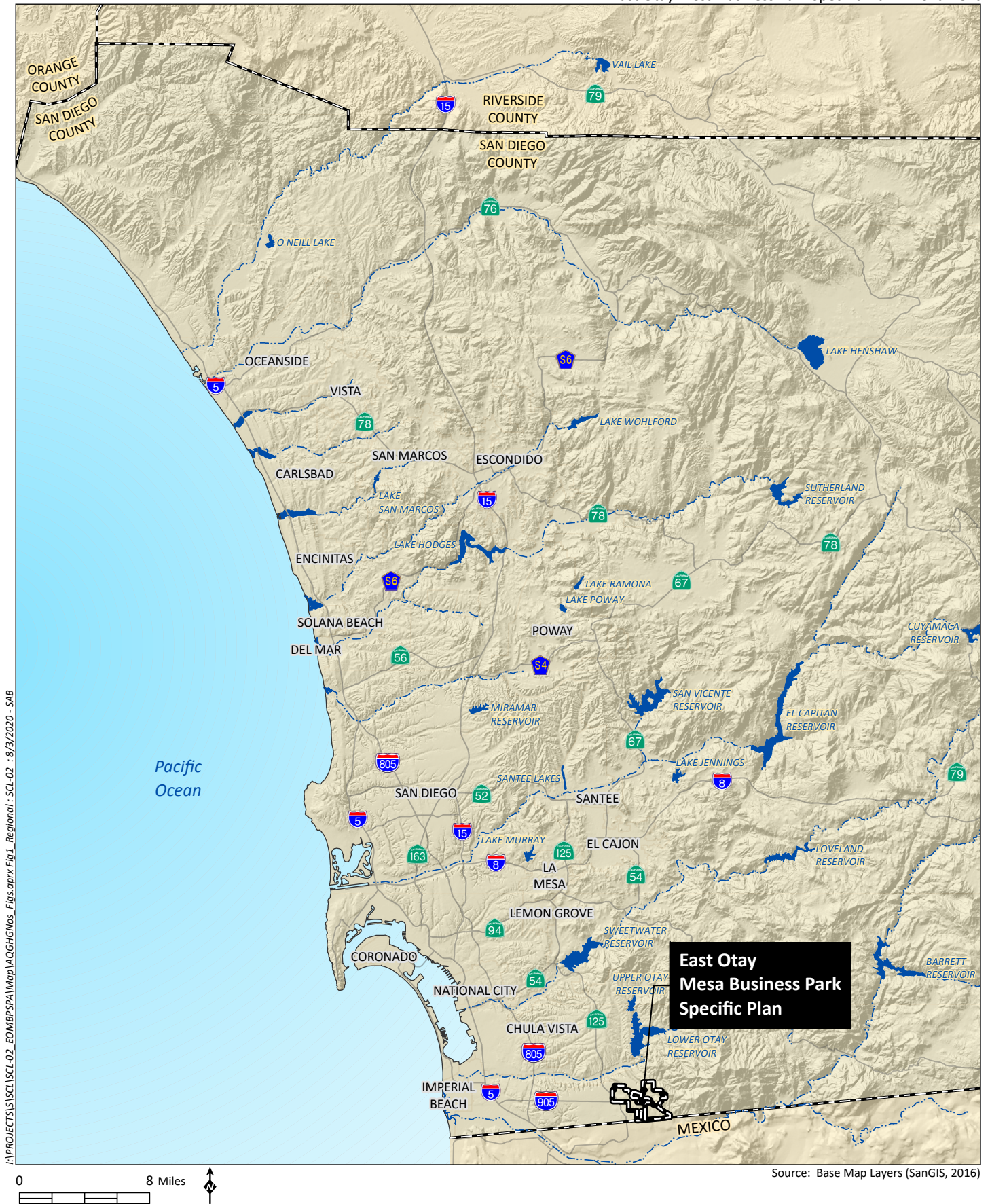
Joanne Dramko
Senior Technical Specialist

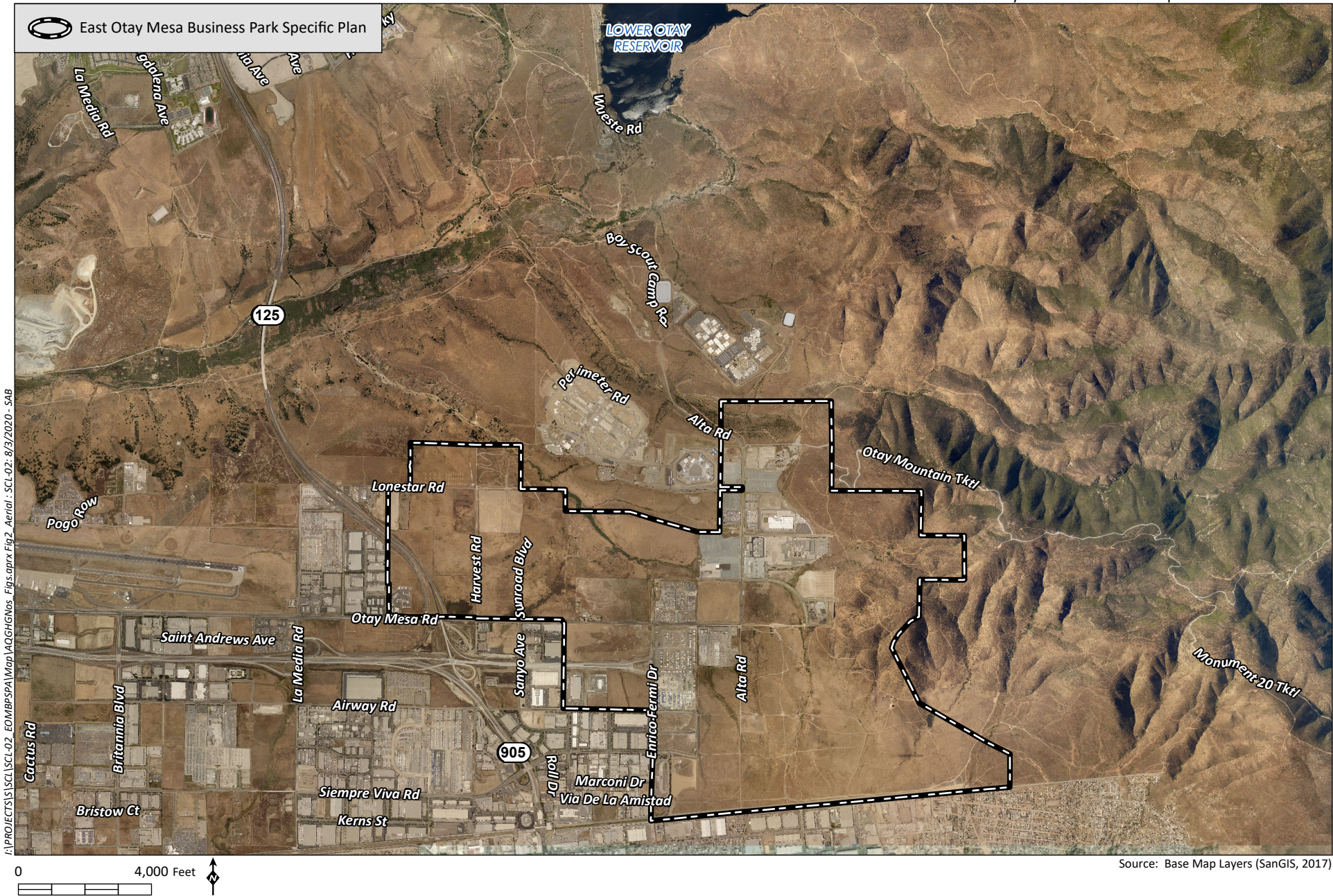
Figures:

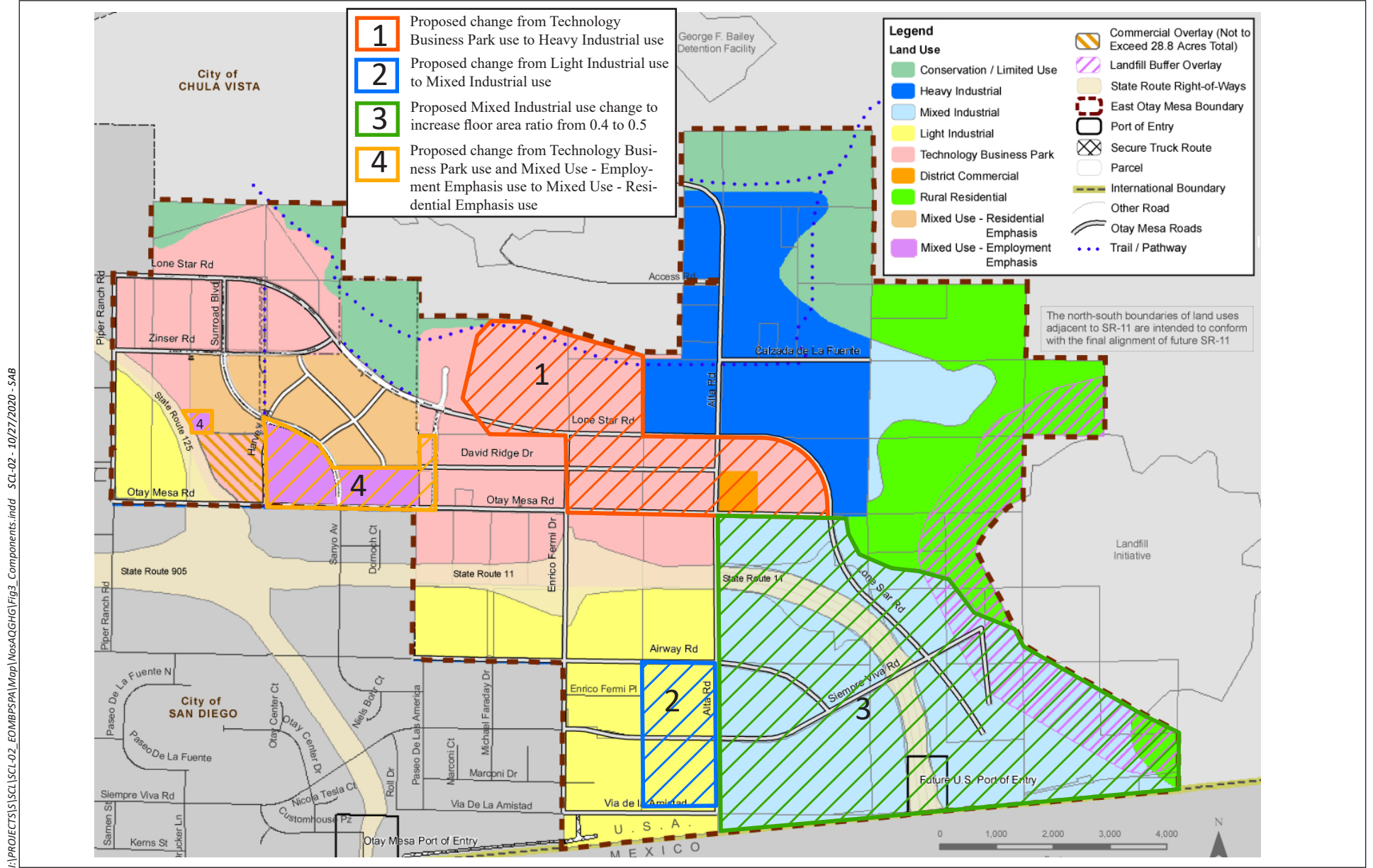
Figure 1, Regional Location

Figure 2, Aerial Photograph of Project Vicinity

Figure 3, Project Components







Source: County of San Diego (2018)

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available for future development. The inclusion of this reduced development potential would further reduce Project impacts as those identified in the study. No further analysis is required.

Sincerely,

A handwritten signature in blue ink that reads "Jason Runyan". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Jason Runyan
Noise Analyst