

TECHNICAL MEMORANDUM

820-010

PREPARED FOR: County of San Diego/GDCI Proctor Valley, L.P.

PREPARED BY: Dexter Wilson Engineering, Inc.

DATE: December 2, 2019

**SUBJECT: Water Conservation Plan Update for Otay Ranch Village 14 and
Planning Area 16/19 Proposed Project Amendment**

Introduction

This Memorandum reflects proposed changes to the Otay Ranch Village 14 and Planning Areas 16/19 Project that was approved by the San Diego County Board of Supervisors on June 26, 2019 (Approved Project). The changes to the Approved Project would reconfigure the development footprint to consolidate development in Village 14; add 147 units, for a total of 1,266 residential units; and reduce impacts by approximately 230 acres, to 579 acres (the Proposed Project Amendment). Figure 1 in Attachment A, Regional Location Map, shows the regional location of the Approved Project Area and the Proposed Project Amendment Project Area, in the County of San Diego (County).

An Environmental Impact Report (EIR) was prepared for the Approved Project and was certified by the Board on June 26, 2019. The Final EIR analyzed the potential impacts of the Approved Project. The Final EIR also analyzed potential impacts associated with the EIR Land Exchange Alternative, which was one of the alternatives to the Approved Project. The Final EIR is incorporated herein by reference and the results are summarized in Section 3 and mitigation measures are described in Section 5.

The Final EIR analyzed the Approved Project's potential impacts to water conservation. This Water Conservation Technical Memorandum was prepared for the Proposed Project Amendment. The purpose of this analysis is to evaluate whether, and to what extent, the potential impacts of the Proposed Project Amendment to water conservation differ from those of the Approved Project and the EIR Land Exchange Alternative. This technical memorandum includes the following sections: (1) background, (2) Proposed Project Amendment description, (3) summary of the Approved Project's impacts to water conservation, (4) analysis of the Proposed Project Amendment's impacts to water conservation, (5) mitigation measures, and (6) conclusion.

For additional context, the following terminology is used in this Technical Memorandum.

Terminology

Approved Project: The project described in Otay Ranch Village 14 and Planning Areas 16/19 Tentative Map 5616, Specific Plan 16-002, and the certified EIR, which the County of San Diego (County) approved on June 26, 2019. The Approved Project permits 1,119 residential units within a Project Area of approximately 1,369 acres. The Development Footprint of the Approved Project is 809 acres.

Conserved Open Space: Conserved Open Space refers to 24.5 acres of land within the Project Area, which, while designated in the Otay Ranch General Development Plan/Otay Subregional Plan (Otay Ranch GDP/SRP) for residential uses within Village 14 and Planning Areas 16/19, will not be developed as part of the Proposed Project Amendment. Instead, the Conserved Open Space will be preserved on site and be (a) added to the Otay Ranch Resource Management Plan (RMP) Preserve (through a future RMP Amendment), (b) managed under a separate RMP, or (c) utilized to mitigate impacts to the City of San Diego Multiple Species Conservation Program Cornerstone Lands. The Conserved Open Space areas are located adjacent to Otay Ranch RMP Preserve and will be conserved by recording a biological open space easement over the land.

Development Footprint: The areas where a given project will cause permanent or temporary ground disturbance. The Development Footprint includes all on-site development, off-site improvements, and impacts resulting from infrastructure and other allowable uses within the Otay Ranch Resource Management Plan (RMP) Preserve.

EIR Land Exchange Alternative: The project alternative identified as the "Land Exchange Alternative" in Chapter 4 of the certified Final EIR. This Land Exchange Alternative contemplated a land exchange with the California Department of Fish and

Wildlife (CDFW) and would develop 1,530 residential units within a Project Area of approximately 2,387.6 acres, with a Development Footprint of 658.3 acres.

Off-Site Improvements: Off-site improvements total approximately 40.1 acres and include Proctor Valley Road, wet and dry utilities, drainage facilities, trails, an off-site sewer pump station in the southern reach of Proctor Valley Road, and off-site sewer facilities to connect to the Salt Creek Interceptor as planned since 1994.

Project Area: The total land area for the Proposed Project Amendment as contemplated in the proposed land exchange between applicant and CDFW.¹ The Project Area consists of approximately 1,283.6 acres currently owned by GDCI Proctor Valley, L.P., the owner/applicant, 219.4 acres currently owned by CDFW, and approximately 40.1 acres of off-site improvements, for a total of 1,543 acres.

Proposed Project Amendment: The Proposed Project Amendment reflects proposed changes to the Approved Project, which would add 147 units for a total of 1,266 residential units and would reduce the Development Footprint by approximately 230 acres, to a total of 579 acres, within a Project Area of 1,543 acres, as shown on Figure 2 in Attachment A and more fully described below in Section 2. The Proposed Project Amendment includes a Revised Tentative Map and Specific Plan Amendment. As contemplated in the Dispute Resolution Agreement, the Proposed Project Amendment assumes and will require a County-initiated amendment to the MSCP County Subarea Plan. Because the amendment to the MSCP County Subarea Plan will be initiated by the County, it is not part of the Proposed Project Amendment.

PV1 and PV3: PV1 and PV3 are areas of the Approved Project located in Village 14 as shown on Figure 3 attached.

Revised Tentative Map: The Revised Tentative Map reflects revisions to the June 26, 2019, Approved Tentative Map #5616 that are necessary to process and implement the land exchange with CDFW and the Proposed Project Amendment in the County.

Specific Plan Amendment: The Specific Plan Amendment reflects revisions to the June 26, 2019, Approved Specific Plan #16-002 that are necessary to process and implement the land exchange with CDFW and the Proposed Project Amendment in the County.

¹ As indicated above, the land exchange necessary to implement the Proposed Project Amendment must be approved by the California Wildlife Conservation Board.

1. Background

The Proposed Project Amendment Project Area comprises approximately 1,543 acres of undeveloped land within the Proctor Valley area of the 23,000-acre Otay Ranch master planned community (see Figure 4 in Attachment A, Proposed Project Amendment Project Area). The Proposed Project Amendment reflects proposed changes to the Approved Project, including a proposed land exchange with the California Department of Fish and Wildlife (CDFW).

On June 27, 2019, the owner/applicant of the Approved Project entered into a Dispute Resolution Agreement with CDFW, the U.S. Fish and Wildlife Service, and the County. Pursuant to this agreement, the owner/applicant would seek a land exchange with CDFW through a process overseen by the California Wildlife Conservation Board. The proposed land exchange, if approved by the Wildlife Conservation Board, would require the owner/applicant to (i) transfer 147.3 acres in Village 14 and 192.4 acres in Planning Area 16 to CDFW, and (ii) record a conservation easement over 191.5 acres in Planning Area 16. In exchange, CDFW would transfer 219.4 acres in Village 14 to the owner/applicant. The Proposed Project Amendment would then be implemented upon the lands within the applicant's ownership, including those received via the Wildlife Conservation Board land exchange. Because the Proposed Project Amendment assumes the above-described land exchange, it would result in a different development footprint than the Approved Project's development footprint. Therefore, a Specific Plan Amendment to the approved Village 14 and Planning Areas 16/19 Specific Plan and a Revised Tentative Map are required processes for the Proposed Project Amendment.

While the Proposed Project Amendment and EIR Land Exchange Alternative both contemplate exchanges of land with the CDFW, the Development Footprints and other aspects differ. It is important to note that the Development Footprint of the Proposed Project Amendment was assessed in the certified Final EIR as part of the Approved Project Development Footprint and as part of the EIR Land Exchange Alternative Development Footprint.

Dexter Wilson Engineering, Inc. prepared the following technical reports for the Final EIR which are incorporated herein by reference:

- Final EIR Chapter 3 Appendix 3.1.2-3 Water Conservation Plan dated February 2018.

- Final EIR Chapter 4 Appendix 4.1-G Land Exchange Alternative Water Conservation Plan dated February 2018.

Section 2. Proposed Project Amendment Description and Summary of Amendment/Revisions

The Proposed Project Amendment proposes 1,266 residential units within a Project Area of 1,543 acres. The Proposed Project Amendment Development Footprint would be approximately 578.6 acres, which would consist of approximately 513.1 acres within Otay Ranch Village 14, 25.2 acres within Otay Ranch Planning Area 19, and 40.1 acres of off-site improvements (i.e., Proctor Valley Road). Of the 1,266 residential units, 1,253 units would be located in Village 14 (consistent with the Otay Ranch GDP/SRP) and 13 units would be located in Planning Area 19 (consistent with the Otay Ranch GDP/SRP). The Proposed Project Amendment is depicted in Figure 2 in Attachment A, Proposed Project Amendment Site Utilization Plan and summarized in Tables 1 through 3 in Attachment A.

As described above, the Proposed Project Amendment would also include a land exchange between the owner/applicant and CDFW, which would require the owner/applicant to transfer 339.7 acres to CDFW and record a conservation easement over 191.5 acres, and, in exchange, CDFW would transfer 219.4 acres in Village 14 to the owner/applicant to create a consolidated Development Footprint. The proposed land exchange between the applicant and CDFW is depicted in Figure 3 in Attachment A. As defined above, the Proposed Project Amendment requires a Specific Plan Amendment and Revised Tentative Map, which must be approved by the County. The Revised Tentative Map would replace that certain approved Tentative Map TM #5616, approved by the County on June 26, 2019. The Specific Plan Amendment would amend the Specific Plan 16-002 to reflect the Proposed Project Amendment, including the Revised Tentative Map and the land exchange with CDFW.

Proposed Project Amendment Relative to the Approved Project and the EIR Land Exchange Alternative.

The Final EIR evaluated both the Approved Project and the EIR Land Exchange Alternative at a project level of analysis. This Technical Memorandum examines whether the Final EIR, through its analysis of the Approved Project and the EIR Land Exchange Alternative, covered all anticipated impacts of the Proposed Project Amendment. Figure 5 in Attachment A depicts the limits of the development contemplated under the Approved Project, the EIR Land Exchange Alternative, and the Proposed Project Amendment. Table 4 provides a summary of

the components for the Proposed Project Amendment, the Approved Project, and the EIR Land Exchange Alternative. Note that from a geographical perspective, each acre that comprises the Proposed Project Amendment's Development Footprint is located either within the Approved Project Development Footprint or within the EIR Land Exchange Alternative Development Footprint. In other words, no portion of the Proposed Project Amendment Development Footprint is outside the combined Approved Project and EIR Land Exchange Alternative Development Footprints.

TABLE 4 PROPOSED PROJECT AMENDMENT COMPARISON TO APPROVED PROJECT AND EIR LAND EXCHANGE ALTERNATIVE			
Description	Proposed Project Amendment	Approved Project	EIR Land Exchange Alternative
Development Footprint (Acres)	579	809	658
Project Area (Acres)	1,543	1,369	2,388
Offsites (Acres)	40	85	40
Units	1,266	1,119	1,530
Proctor Valley Rd.	Same	Same	Same

Section 3. Approved Project CEQA Findings

To provide the appropriate context to compare the impacts of the Proposed Project Amendment with the impacts anticipated under the Approved Project, this section provides a summary of the Approved Project's Certified EIR Findings related to water impacts. Section IV, below, then describes the impacts of the Proposed Project Amendment and compares the anticipated impacts against the Approved Project and the Environmentally Superior Alternative, the EIR Land Exchange Alternative. A summary of the key findings from the Approved Project and Land Exchange Alternative reports are provided in the following sections.

A. Approved Project. The Approved Project is within the boundaries of the Otay Water District (OWD) for water service. OWD has existing facilities in the area and has master planned for the extension of facilities through the project site.

There are a number of mandatory water conservation measures that the project will be required to comply with to meet California Green Building Code requirements and other applicable standards that are in effect at the time of construction. Additionally, the landscaped areas of the project will need to comply with the County's Water Conservation in Landscaping Ordinance. In addition to mandated water conservation measures the development has committed to a number of non-mandated water conservation measures including hot water pipe insulation, pressure reducing valves, and water efficient dishwashers.

Although water conservation measures will be implemented throughout all land uses within the project, the focus of this report was on the potential savings associated within the residential portion of the project. Table 5 summarizes the estimated residential water conservation savings for the Approved Project.

TABLE 5 APPROVED PROJECT RESIDENTIAL WATER CONSERVATION SAVINGS SUMMARY	
Description	Estimated Savings, gpd
Residential (>8 DU/ac)	2,831
Residential (3-8 DU/ac)	2,838
Residential (1-3 DU/ac)	33,610
Residential (<1 DU/ac)	8,165
TOTAL	47,444

The total estimated water savings represent approximately 5.9 percent of total project water use. Additional measures such as gray water systems and rain water harvesting will be

offered as options to homeowner's, but the associated savings have not been quantified since there is no way to ensure how many future homeowners will implement these options.

Water conservation measures throughout the proposed development will need to be implemented to comply with several guiding documents and include low water use fixtures, hot water pipe insulation, pressure reducing valves, efficient dishwashers, and low water use landscaping. In addition to California Green Building Code requirements, the project will comply with Development Regulations, the County's Water Conservation in Landscaping Ordinance, the Fire Protection Plan, and the Preserve Edge Plan, as applicable.

B. EIR Land Exchange Alternative. The EIR Land Exchange Alternative would remove development from Planning Areas 16 and 19 and concentrate development within Village 14. Proposed development for the EIR Land Exchange Alternative could be served by the OWD System by the planned extension of existing facilities. Table 6 summarizes the estimated residential water conservation savings for the EIR Land Exchange Alternative.

TABLE 6 EIR LAND EXCHANGE ALTERNATIVE RESIDENTIAL WATER CONSERVATION SAVINGS SUMMARY	
Description	Estimated Savings, gpd
Residential (>8 DU/ac)	1,634
Residential (3-8 DU/ac)	27,889
Residential (1-3 DU/ac)	29,505
TOTAL	57,394

The total estimated water savings represent approximately 6.4 percent of total project water use. Additional measures such as gray water systems and rain water harvesting will be offered as options to homeowner's, but the associated savings have not been quantified since there is no way to ensure how many future homeowners will implement these options.

Water conservation measures throughout the proposed development will need to be implemented to comply with several guiding documents. In addition to California Green

Building Code requirements, the project will comply with Development Regulations, the County's Water Conservation in Landscaping Ordinance, the Fire Protection Plan, and the Preserve Edge Plan, as applicable.

Section 4. Proposed Project Amendment Water Conservation Measures

The Proposed Project Amendment would receive service from OWD and would be required to implement the same mandatory and non-mandatory water conservation measures as the Approved Project and the EIR Land Exchange Alternative. Table 7 summarizes the estimated residential water conservation savings for non-mandatory water conservation measures on the Proposed Project Amendment.

TABLE 7 SINGLE-FAMILY RESIDENTIAL WATER CONSERVATION MEASURES					
Measure	Location	Yearly Water Savings, gpy/unit	Daily Water Savings, gpd/unit	Percentage of Total Usage¹	Project Total Water Savings², gpd
Residential (>8 DU/ac)					
Hot Water Pipe Insulation	Indoor	2,400	6.58	1.5	987
Pressure Reducing Valves	Indoor	1,800	4.93	1.1	740
Water Efficient Dishwashers	Indoor	650	1.78	0.4	267
Subtotal		4,850	13.29	3.1	1,994
SF Residential (3 – 8 DU/ac)					
Hot Water Pipe Insulation	Indoor	2,400	6.58	1.5	3,784
Pressure Reducing Valves	Indoor	1,800	4.93	1.1	2,835
Water Efficient Dishwashers	Indoor	650	1.78	0.4	1,024
Residential Landscaping	Outdoor	9,125	21.75	5.0	12,506
Subtotal		12,790	35.04	8.1	20,149

TABLE 7 SINGLE-FAMILY RESIDENTIAL WATER CONSERVATION MEASURES					
Measure	Location	Yearly Water Savings, gpy/unit	Daily Water Savings, gpd/unit	Percentage of Total Usage¹	Project Total Water Savings², gpd
SF Residential (1 – 3 DU/ac)					
Hot Water Pipe Insulation	Indoor	2,400	6.58	0.9	3,474
Pressure Reducing Valves	Indoor	1,800	4.93	0.7	2,603
Water Efficient Dishwashers	Indoor	650	1.78	0.3	940
Residential Landscaping	Outdoor	12,775	35.00	5.0	18,480
Subtotal		17,625	48.29	6.9	25,497
SF Residential (<1 DU/ac)					
Hot Water Pipe Insulation	Indoor	2,400	6.58	1.3	85
Pressure Reducing Valves	Indoor	1,800	4.93	1.0	64
Water Efficient Dishwashers	Indoor	650	1.78	0.4	23
Residential Landscaping	Outdoor	18,250	50.00	5.0	650
Subtotal		23,100	63.29	6.3	822
TOTAL					48,462

¹ Based on 200 gpd/unit for 1-3 DU/AC, and 1,000 gpd/unit for <1 DU/Ac.

² Based on 150 MF units (>8 DU/Ac), 575 SF units (3-8 DU/Ac), 528 SF units (1-3 DU/Ac), and 13 SF units (<1 DU/Ac).

The total estimated water savings represent approximately 6.4 percent of total project water use. Additional measures such as gray water systems and rain water harvesting will be offered as options to homeowner's, but the associated savings have not been quantified since there is no way to ensure how many future homeowners will implement these options.

Water conservation measures throughout the proposed development will need to be implemented to comply with several guiding documents. In addition to California Green

Building Code requirements, the project will comply with Development Regulations, the County's Water Conservation in Landscaping Ordinance, the Fire Protection Plan, and the Preserve Edge Plan, as applicable.

Projected water conservation savings for the Proposed Project Amendment as compared to the Approved Project and Land Exchange Alternative are provided in Table 8.

TABLE 8 RESIDENTIAL WATER CONSERVATION SAVINGS COMPARISON			
Description	Water Conservation Savings, gpd		
	Proposed Project Amendment	Approved Project	Land Exchange Alternative
Estimated Savings, gpd	48,462	47,444	57,394
Percentage of Total Water Use	6.4%	5.9%	6.4%

As shown, the projected water conservation savings for the Proposed Project Amendment is similar to the savings projections for the Approved Project and EIR Land Exchange Alternative.

The proposed water conservation efforts do not propose any new measures or impacts that were not already identified for the Approved Project and Land Exchange Alternative.

Section 5. Certified EIR Mitigation Measures

There are no mitigation measures identified in the certified EIR related to water conservation. The Proposed Project Amendment does not require any proposed mitigation measures as a result of the proposed water conservation plan.

Section 6. Conclusion

The Otay Ranch Village 14 and Planning Area 16/19 Final EIR for the Approved Project determined that impacts to water conservation would be less than significant and did not require any mitigation measures. Based upon the changes proposed under the Proposed Project Amendment, no new or greater impacts would occur to water conservation and no mitigation is required.

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ATTACHMENT A

**PROPOSED PROJECT AMENDMENT
LAND USE SUMMARY AND GRAPHICS**

Table 1
Village 14 and Planning Areas 16/19
Proposed Project Amendment
Site Utilization Plan Summary
November, 2019

Description	Village 14		Planning Area 16/19		Total Proposed Project	
	Gross Acres	Target Units	Gross Acres	Units	Gross Acres ⁽¹⁾	Target Units
Residential Subtotal ⁽¹⁾	386.6	1,253	14.9	13	401.4	1,266
Non-Residential Uses						
Mixed Use ⁽²⁾	2.7				2.7	
Public Parks	10.2				10.2	
Private Parks/Recreation ⁽³⁾	9.5				9.5	
Public Safety Site	2.3				2.3	
Elementary School Site	9.9				9.9	
Open Space	47.8		1.7		49.5	
Conserved Open Space	23.0		1.5		24.5	
Otay Ranch RMP Preserve	278.6		98.4		377.0	
Circulation	23.3		3.4		26.7	
Non-Residential Uses Subtotal	407.2		105.0		512.1	-
Total Proposed Project Amendment	793.7	1,253	119.8	13	913.6	1,266
Other Offsites						
Offsite Improvements	40.1				40.1	
Offsite Preserve PA16			58.3		58.3	
Parcels Exchanged to CDFW	147.3		192.4		339.7	
Conservation Easement PA16			191.5		191.5	
Total Proposed Project Amendment Project Area					1,543.1	1,266

(1) Total residential gross acres includes 98.6 acres of related internal slopes, fuel modification and/or preserve edge open space lots.

(2) Village 14 Mixed Use acreage includes 10,000 sf of commercial use.

(3) Village 14 has 2.1 acres of private pocket parks included in the residential acreage; therefore the subtotal including PPP is 11.6 acres.

(4) May not total due to rounding.

Table 2
Proposed Project Amendment
Site Utilization Plan Detail
November 1, 2019

VILLAGE 14				
Description		Gross Acres	Units	Density
Single Family Residential				
R-1	50*100	33.1	103	3.1
R-2	60*100	48.3	136	2.8
R-3	60*85	35.8	112	3.1
R-4	60*100	31.5	73	2.3
R-5	75*100	51.7	121	2.3
R-6	60*85	22.5	47	2.1
R-8	Courtyard M	21.1	116	5.5
R-9	60*85	33.0	96	2.9
R-10	60*85	8.5	31	3.7
R-11	50*85 M	25.4	119	4.7
R-12	50*100	27.6	94	3.4
R-17	70*100	7.4	10	1.3
R-18	70*100	27.8	45	1.6
Single Family Residential Subtotal		373.8	1,103	3.0
MultiFamily				
R-7	MF	12.7	150	11.8
MF Subtotal		12.7	150	11.8
Residential Subtotal		386.6	1,253	3.2
Non-Residential Uses				
Mixed Use ⁽²⁾	MU - C	2.7		
Public Parks				
P-1	Village Green Park	6.2		
P-2	Scenic Park	3.9		
Public Parks Subtotal		10.2		
Private Parks & Recreation				
PP-1	Central	2.8		
PP-2	Village Core	2.1		
PP-3	West	1.9		
PP-4	West	1.5		
PP-5	northwest	0.8		
PP-6	Northeast	0.4		
PPP (3)	Various	0.0		
Private Parks/Recreation Subtotal		9.5		
Public Safety Site				
Elementary School Site		9.9		
Open Space		47.8		
Conserved Open Space		23.0		
Otay Ranch RMP Preserve		274.9		
Circulation - In Preserve		3.7		
Circulation - Arterial		23.3		
Non-Residential Uses Subtotal		407.2		
Village 14 Subtotal		793.7	1,253	1.6

(1) Residential gross acres includes 96.5 acres of related internal slopes, fuel modification and/or preserve edge open space lots.

(2) Village 14 Mixed Use acreage includes 10,000 sf of commercial use.

(3) Village 14 has 2.1 acres of private pocket parks included in the residential acreage; therefore the subtotal including PPP is 11.6 acres.

(4) May not total due to rounding.

Table 3
Proposed Project Amendment
Site Utilization Plan Detail
November 1, 2019

PLANNING AREA 16/19			
Description	Gross Acres	Units	Density
Residential Uses			
R-13 PA 19 Estates	14.9	13	0.9
Residential Subtotal ⁽¹⁾	14.9	13	0.9
Non-Residential Uses			
Circulation in Preserve	1.4		
Open Space	1.7		
Conserved Open Space	1.5		
Otay Ranch RMP Preserve	97.0		
Circulation Arterial	3.4		
Non-Residential Uses Subtotal	105.0		
Planning Area 19 Subtotal	119.8	13	0.1
Proposed Project Amendment Total	913.6	1,266	1.4

OTHER			
Description	Gross Acres	Units	Density
Other Applicant Owned NAP of TM			
PV1 exchanged to CDFW	18.9		
PV3 exchanged to CDFW	128.4		
R-15 Exchanged to CDFW	49.9		
R-16 Exchanged to CDFW	142.5		
R-14 Conservation Easement Area	191.5		
R-15 Preserve	10.5		
R-16 Preserve	47.8		
Subtotal	589.5		
Offsite Acres	40.1		
Proposed Project Amendment Project Area	1,543.1	1,266	

Notes:

- (1) Residential gross acres includes 2.1 acres of related internal slopes, fuel modification and/or preserve edge open space lots.
(2) May not total due to rounding.

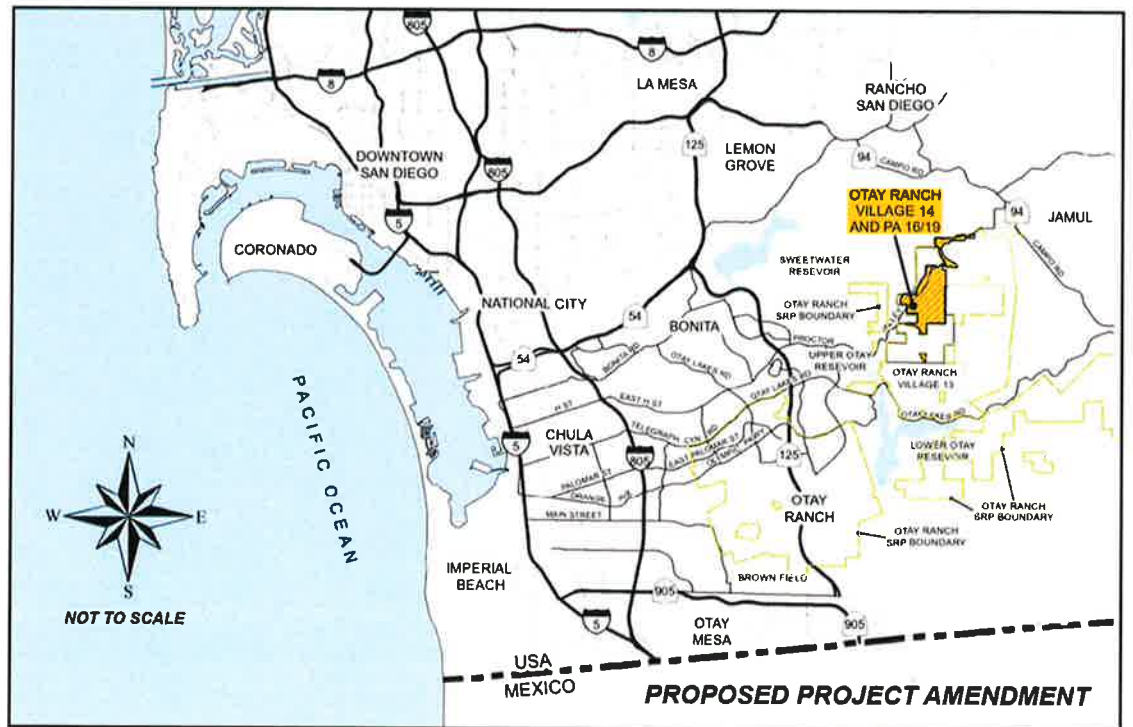
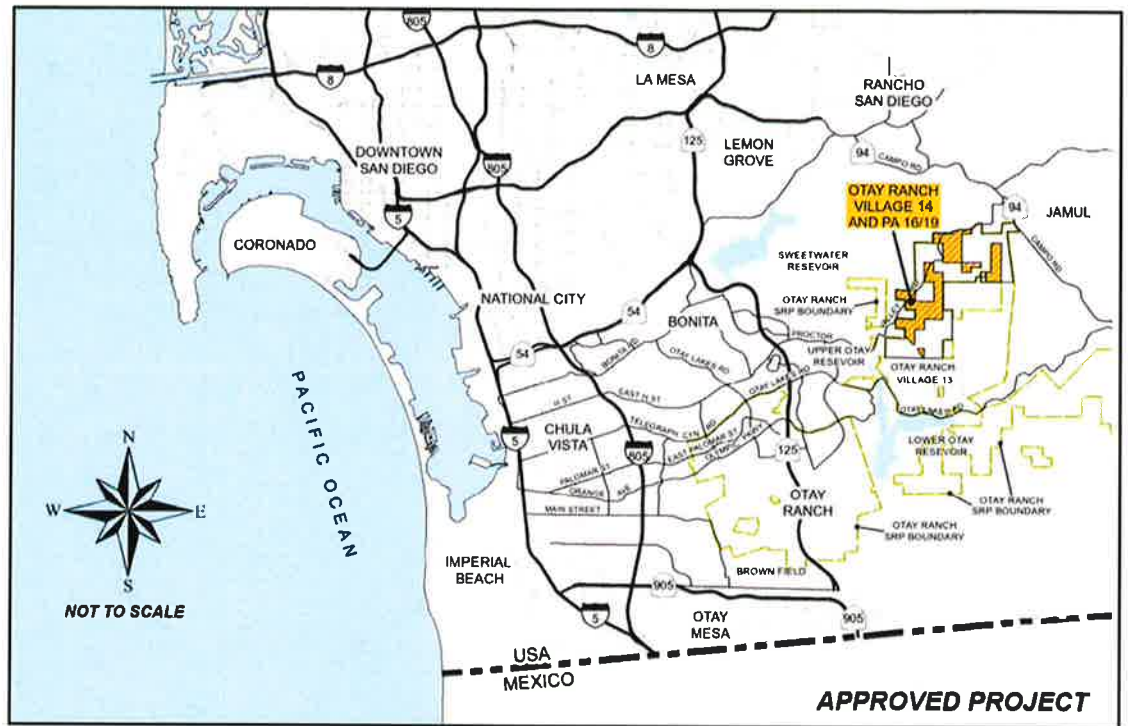


FIGURE 1
Regional Location Map

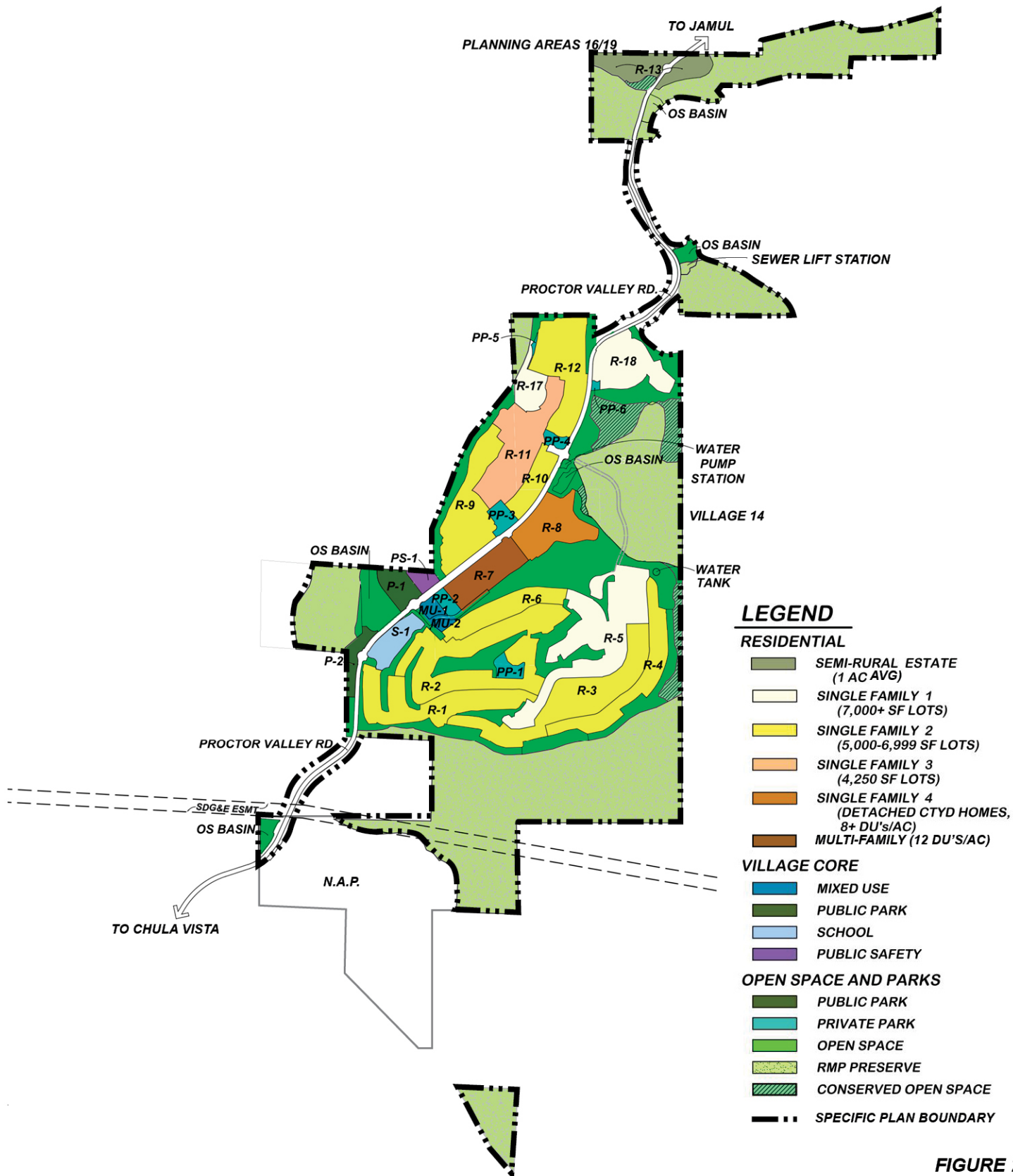
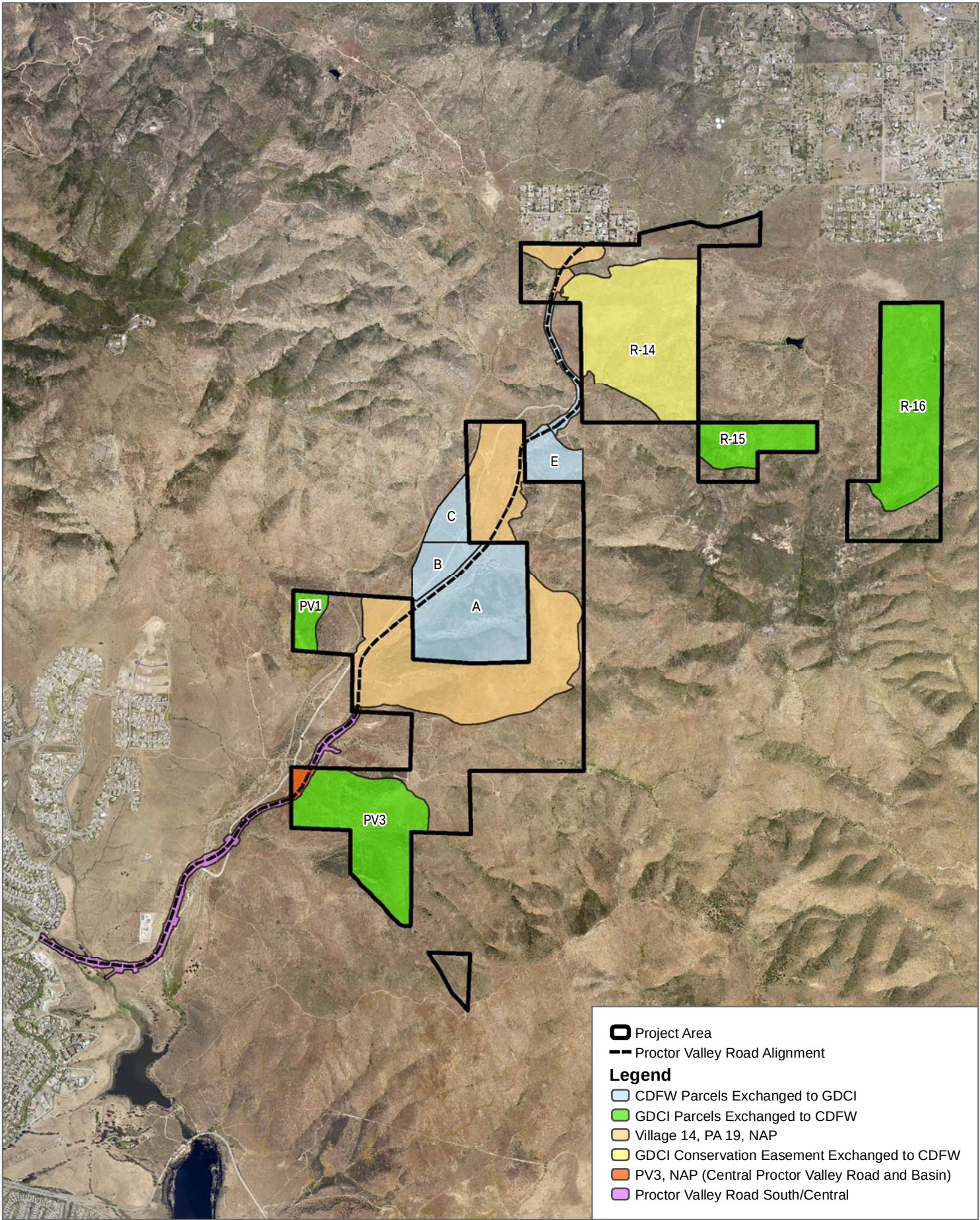


FIGURE 2
Proposed Project Amendment
 Otay Ranch Village 14 and Planning Areas 16/19



SOURCE: SANGIS 2017; Hunsaker 2019

FIGURE 3

Proposed Land Exchange

Otay Ranch Village 14 and Planning Areas 16/19

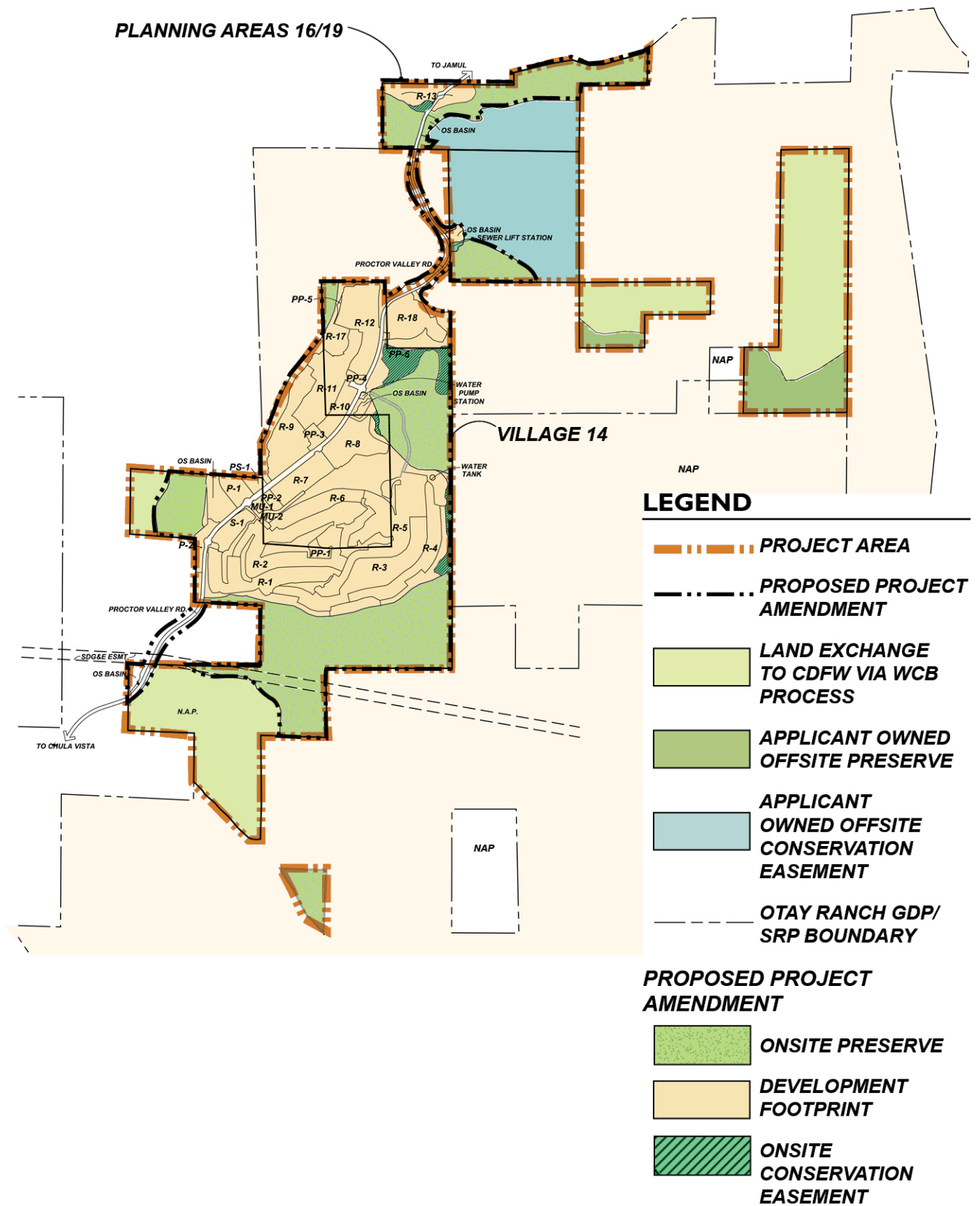
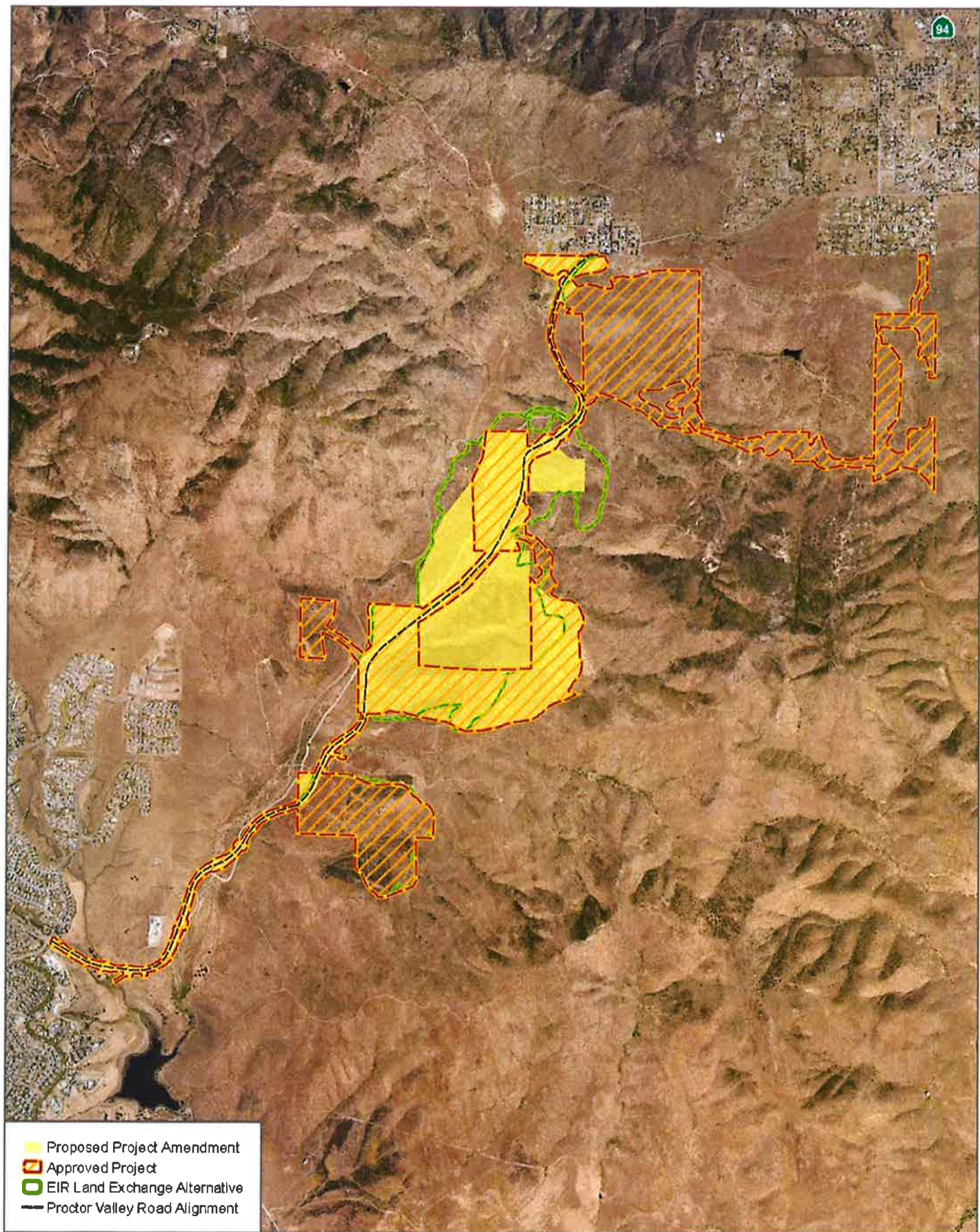


FIGURE 4
Proposed Project Amendment – Project Area
 Otay Ranch Village 14 and Planning Areas 16/19



SOURCE: SANGIS 2017, Hunsaker 2019

FIGURE 5

Certified EIR Study Area

Otay Ranch Village 14 and Planning Areas 16/19 Proposed Project Amendment