ADDITIONAL INFORMATION ON THE OTAY RANCH VILLAGE 14 AND PLANNING AREA 16/19 PROPOSED PROJECT AMENDMENT ADDENDUM

The Otay Ranch Village 14 and Planning Areas 16/19 Specific Plan Amendment and Revised Tentative Map (hereafter, the Proposed Project Amendment or PPA) was released for public review from January 2, 2020 through February 18, 2020. No comments were received on the Specific Plan Amendment or the Revised Tentative Map. Although CEQA does not require a lead agency to circulate an addendum for public review and comment, the County nevertheless made the contents of the Proposed Project Amendment EIR Addendum (to the Otay Ranch Village 14 and Planning Areas 16/19 Final Environmental Impact Report (EIR Addendum), available to the public for informational purposes. The County subsequently received a number of letters on the EIR Addendum, and while CEQA does not require responses to such comments, the following information helps to clarify for the decision makers some of the analyses contained in the EIR Addendum to the extent such analyses were addressed in public comments.

In general, similar issues identified during the public review for the Approved Project's Draft EIR and subsequently addressed by the Approved Project's Final EIR were referred to by CBD, EHL, and CNPSSD. Please refer to Volume II and Chapter 8.0 of the Approved Project FEIR for additional information.

STATUTORY REQUIREMENTS REGARDING PREPARATTION OF AN ADDENDUM VS A SUBSEQUENT EIR

For purposes of the Proposed Project Amendment, the County determined that an EIR Addendum, as opposed to a Subsequent or Supplement EIR, was the appropriate CEQA document in this instance. The County based its determination on the fact that the impacts of the Proposed Project Amendment, while slightly different than those of the Approved Project, were nevertheless adequately analyzed in the Final EIR for the Approved Project, including the Final EIR's assessment of project alternatives. Therefore, the impacts of the Proposed Project Amendment do not meet the criteria set forth CEQA Guidelines section 15162 requiring another EIR. See Attachment 1, which provides a side by side analysis of the requirements of Section 15162 regarding the preparation of Negative Declarations and Subsequent EIRs. As evidenced therein, the Proposed Project Amendment does not trigger any of the provisions requiring a Subsequent EIR.

GHG EMISSIONS OF THE PROPOSED PROJECT AMENDMENT AND IMPLEMENTATION OF THE DISPUTE RESOLUTION AGREEMENT COMPARED TO THE COUNTY'S APPROVED PLANNING FRAMEWORK

The Proposed Project Amendment, as explained in Section XI of the EIR Addendum is consistent with the County's land use planning framework. Specifically, the EIR Addendum (Appendix N, General Plan Consistency Analysis) comprehensively evaluated the consistency of the Proposed Project Amendment with the County's General Plan, Jamul/Dulzura Subregional Plan, and Otay Ranch GDP/SRP. The consistency analysis determined that the Proposed Project Amendment does not conflict with the land use designations, regional category designations and zoning for the Project Area set forth in the referenced land use plans. More specifically, the General Plan, Jamul/Dulzura Community Plan and Otay Ranch GDP/SRP allocated 2,123 dwelling units for development in Village 14 and Planning Areas 16/19. Under the framework of the Dispute Resolution Agreement, the total number of units for this area would be limited to 1,266 units as proposed by the Proposed Project Amendment. The Proposed Project Amendment also does not conflict with applicable goals, policies, and regulations of the County's General Plan, Jamul/Dulzura Subregional Plan and Otay Ranch GDP/SRP, or SANDAG's San Diego Forward: The Regional Plan.

The Proposed Project Amendment is only required to implement Step 2, CAP Measures Consistency, because it does not propose a General Plan Amendment or any changes to the existing regional categories, land use designations, or zoning under Step 1.

The Proposed Project Amendment's compliance with Step 2 is illustrated in Table 1 (CAP Measures Consistency) of Attachment B to Addendum Appendix H. The Proposed Project Amendment's compliance with the GHG reduction measures evaluated in Step 2 would be required as a Condition of Approval.

In addition, the Proposed Project Amendment reduces its GHG emissions within San Diego County, like the Approved Project, through use of on-site project design features (PDF-AQ/GHG-1 through PDF AQ/GHG-10, PDF TR-1, and PDF UT-1 through PDF UT-5; see Addendum Appendix H). The following list identifies the PDFs that would be implemented by the Proposed Project Amendment:

PDF-AQ/GHG-1: Wood Burning Stoves and Fireplaces – no wood burning stoves or fireplaces would be constructed.

PDF-AQ/GHG-2: Zero Net Energy Residences – compliance with Zero Net Energy (ZNE) design standards defined by the California Energy Commission.

PDF-AQ/GHG-3: Non-Residential Energy Improvement Standards – non-residential land uses shall achieve a 10% greater building energy efficiency than required by the 2016 energy efficiency standards in Title 24, Part 6 of the California Code of Regulations.

PDF-AQ/GHG-4: Energy Star Appliances – appliances (washer/dryers, refrigerators, and dishwashers) shall be Energy Star rated or equivalent.

PDF-AQ/GHG-5: Solar Water Heating – all swimming pools located at private recreation centers shall be designed and constructed to use solar water heating or other technology with an equivalent level of energy efficiency.

PDF-AQ/GHG-6: Outdoor Lighting - all outdoor lighting shall be LED (light emitting diodes) or utilize other high efficiency lightbulbs.

PDF-AQ/GHG-7: New Resident Information Package - information on energy efficiency, energy efficient lighting and lighting control systems, energy management, and existing energy incentive programs shall be provided to new homebuyers.

PDF-AQ/GHG-8: Cool Roofs - residential and non-residential structures shall meet the U.S. Green Building Council standards for cool roofs (i.e., a three-year solar reflectance index (SRI) of 64 for a low-sloped roof and an SRI of 32 for a high- sloped roof).

PDF-AQ/GHG-9: Cool Pavement - outdoor pavement, such as walkways and patios, shall use paving materials with a three-year SRI of 0.28 or initial SRI of 0.33.

PDF-AQ/GHG-10: Electric Vehicle Charging Stations – install a dedicated 208/240 dedicated branch circuit in each garage of every residential unit and one Level 2 electric vehicle (EV) charging station in the garage of half of all residential units, and install Level 2 EV charging stations in 10 parking spaces located in the Village Core's commercial development area and P1 through P4 park area.

PDF-TR-1: Transportation Demand Management – multiple Transportation Demand Management (TDM) strategies shall be implemented to reduce vehicle miles traveled (VMT).

PDF-UT-1: Hot Water Pipe Insulation – hot water pipes shall be insulated, and hot and cold water piping shall be separated, resulting in an estimated annual savings of 2,400 gallons per unit.

PDF-UT-2: Pressure Reducing Valves – the maximum service pressure shall be set to reduce potential leakage and prevent excessive flow, resulting in an estimated annual savings of 1,800 gallons per unit.

PDF-UT-3: Water Efficient Dishwashers – water efficient dishwashers shall be installed, resulting in an estimated annual savings of 650 gallons per unit.

PDF-UT-4: Residential Landscaping – residential landscaping shall comply with the Model Water Efficient Landscape Ordinance set forth in the California Code of Regulations Title 23, Division 2, Chapter 2.7 (Section 490 et seq.). The estimated annual savings is 7,940 gallons per single-family residence where densities are from 3.0 to 10 units per acre, 12,775 gallons per single-family residence where densities are from 1.0 to 3.0 units per acre, and 18,250 gallons per single family residence where densities are less than 1.0 units per acre based on these assumptions.

PDF-UT-5: Homeowners Association – the Homeowner's Associations shall appropriately regulate the use of water for cleaning outdoor surfaces and vehicles through the Covenants, Conditions, and Restrictions.

As presented in Table 1 below, the Proposed Project Amendment's PDFs would result in a decrease of approximately 6,642 MT CO_2e per year as a result of on-site reductions.

Table 1. GHG Emissions Reduction from On-Site Project Design Features (2028)

Emission Source	Metric Tons of CO_2e per Year		
	Proposed Project Amendment without PDFs	*Proposed Project Amendment with PDFs*	*On-Site Reduction (MT CO_2e/Year)*
Area Sources	1,932.72	15.73	-1,916.99
Energy	5,795.88	1,807.27	-3,988.61
Mobile	15,081.35	14,487.24	-594.11
Solid Waste	660.81	660.81	0.00
Water/Wastewater	896.25	896.25	0.00
Carbon Sequestration from Tree Plantings	0.00	(142)	-142.00
Total	**24,367.01**	**17,725.30[1]**	**-6,641.71**

Notes: Numbers may not add exactly due to rounding. Numbers presented in parentheses for carbon sequestration represent an emissions saving/reduction; i.e., a negative number.
Source: Appendix A, Otay Ranch Village 14 and Planning Areas 16/19 Proposed Project Amendment On-Site Emissions Reduction Estimates to Appendix H

[1] Addendum Appendix H, Greenhouse Gas Emissions Technical Memorandum, reports a total of approximately 17,867.30 MT CO_2e in Table 10, Proposed Project Amendment and Approved Project Estimated Annual Operational Greenhouse Gas Emissions (2028), which excludes the benefits of 142 MT CO_2e in carbon sequestration from tree plantings included in Table 1 above.

When viewed over the 30-year project life, without PDFs, the Proposed Project Amendment's emissions would total 731,011 MT CO_2e, or 24,367.01 MT CO_2e/yr. With implementation of the PDFs and the tree plantings, the Proposed Project Amendment's emissions would total 531,771 MT CO_2e, or 17,725.30 MT CO_2e/yr, which represents a 27.26% reduction (totaling 6,641.71 MT CO_2e/yr) in the Proposed Project Amendment's GHG emissions through the implementation of on-site emissions-reducing strategies.

In order to achieve no net increase in GHG emissions, the Proposed Project Amendment is required to implement M-GHG-1 and M-GHG-2 from the Approved Project's FEIR, to secure the remaining necessary reductions (72.74% of the total emissions) through off-site emissions-reducing strategies, including the purchase and retirement of verified carbon offsets as explained in Section 8.4.5 of the FEIR. (Note that the quantitative characterization of the Proposed Project Amendment's on-site reductions is conservative as it does not include the quantification of PDF-AQ/GHG-6 through PDF-AQ/GHG-10 or PDF-UT-5.) As a result of being consistent with the County's planning framework, as well as reducing GHG emissions to net zero through implementation of the on-site PDFs and M-GHG-1 and M-GHG-2, the EIR Addendum determined that impacts to GHG emissions would be less than significant, as also concluded in the Approved Project's FEIR.

Subsequent to certification of the Approved Project's FEIR, on June 27, 2019, the owner/applicant of the Approved Project entered into a Dispute Resolution Agreement (DRA) with CDFW, the U.S. Fish and Wildlife Service, and the County. Pursuant to this agreement, the owner/applicant shall seek a land exchange with CDFW through a process overseen by the California Wildlife Conservation Board. The proposed land exchange is reflected in the Proposed Project Amendment and, if approved by the Wildlife Conservation Board, would require the owner/applicant to:

i. transfer 147.3 acres in Village 14 to CDFW,
ii. transfer 192.4 acres in Planning Area 16 to CDFW, and
iii. 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 CDFW land exchange overseen by the Wildlife Conservation Board.

Under the Proposed Project Amendment, areas previously identified for up to 468 residential units under the County's General Plan and Otay Ranch GDP/SRP, including 112 units in Planning Area 16 and areas commonly referred to as PV1 (4 units) and PV3 (352 units), would ultimately be preserved as open space, while areas under state-control in Village 14 compromising approximately 615 units, would be exchanged for development by the project applicant. The net result is that the Proposed Project Amendment would increase the number of units compared to the Approved Project by 147 units – from 1,119 (Approved Project) to 1,266 (Proposed Project Amendment). Note, however, that the 1,266 residential units are still less than (i) the 1,530 units contemplated in the EIR Land Exchange Alternative (as analyzed in the Final EIR) and (ii) the 2,123 units contemplated in the County's General Plan and regional planning framework.

Furthermore, the County's CAP assumes a maximum potential of 1,529 homes in Village 14 and Planning Areas 16/19, which is 263 more units than the Proposed Project Amendment. As shown in Table 2, the Proposed Project Amendment's reduction of development potential by 263 residential units compared to

the CAP Emissions Inventory Baseline would avoid approximately 3,863.47 MT CO_2e per year of operational,[2] in-County GHG emissions.

Table 2: GHG Emissions Avoided through Implementation of the Proposed Project Amendment and Dispute Resolution Agreement

	Approved Project's Residential Units	Approved Project's Total Residential Emissions (MT CO_2e/year)	GHG Emissions per Unit (MT CO_2e/yr/unit)	Number of Units Reduced under DRA	Annual Emissions Avoided (MT CO_2e/year)
Approved Project	1,119	16,433.83	14.69	263	-3,863.47

Notes: The "Annual Emissions Avoided" quantity was calculated by establishing an emissions per unit rate ([Approved Project's Total Residential Emissions] ÷ [Approved Project's Total Number of Residential Units]) that was then multiplied by the number of developable units eliminated with the proposed land exchange.
Source: Attachment 2, Approved Project Per Residential-Unit GHG Operational Emissions CalEEMod Output File, Dudek, February 2020

Further, approximately 311.6 acres of land previously identified as developable under the County's planning framework (including the General Plan, Otay Ranch GDP/SRP and County MSCP) would be permanently conserved and would not be graded or otherwise developed as a result of the Proposed Project Amendment – an environmental protection and benefit not provided under the Approved Project. This would reduce GHG emissions lost through the release of sequestered carbon by approximately 1,342.00 MT/CO_2e, which – when amortized over 30 years – is approximately 44.77 MT CO_2e year (see Attachment 3, Sequestration Benefits of Proposed Project Amendment). Absent disturbance of the 311.6 acres (which would be precluded once the Dispute Resolution Agreement processes are implemented), this area also would be expected to sequester additional carbon over time and serve as a net sink of carbon moving forward.

Therefore, implementation of the Proposed Project Amendment under the terms of the Dispute Resolution Agreement would reduce emissions compared to the County General Plan and Otay Ranch GDP/SRP (the approved planning framework for Otay Ranch including the project site), and the County's CAP.

Nonetheless, the Proposed Project Amendment would implement the same mitigation measures as those adopted in the Approved Project's FEIR (M-GHG-1 and M-GHG-4) to offset GHG emissions to net zero, even though the Proposed Project Amendment (as well as the Approved Project), as summarized above and described in the Addendum, are consistent with the County General Plan and not density-increasing projects and; therefore, only required to comply with the Step 2 Checklist of the County's Climate Action Plan.

In closing, the evidence and analysis set forth in this thematic response have been provided for informational purposes only, and in order to provide additional context and perspective on the GHG-related environmental co-benefits of the Proposed Project Amendment and implementation of the Dispute Resolution Agreement, as compared to the approved planning framework for the County of San Diego (i.e., the County General Plan and County CAP) and the Otay Ranch GDP/SRP. To be conservative, the Proposed Project Amendment would continue to offset its GHG emissions under the Approved Project's certified FEIR's M-GHG-1 and M-GHG-2 framework per the inventory data set forth in the EIR Addendum.

[2] One-time emissions from construction of the 263 residential units also would be avoided, the benefits of which are not estimated here – a conservative methodological approach.

Wildfire Hazards and Evacuation

Regarding wildfire hazards and evacuation, please refer to Appendix X of the EIR Addendum (Dudek Memorandum on Fire Safety), Appendix J to the EIR Addendum (Fire Protection Technical Memorandum), as well as the Approved Project's Fire Protection Plan and Wildland Fire Evacuation Plan (Appendix 3.1.1-1 and 3.1.1-2 of the Approved Project's FEIR), the Preserve Edge Plan for the Approved Project and Proposed Project Amendment, and Section 8.4.9, Wildfire Protection and Evacuation, of the Final EIR.

Air Quality/PM_{10}

Specific to the Proposed Project Amendment's operational emission of coarse particulate matter (PM_{10}), the EIR Addendum did consider the incremental increase in PM_{10} emissions under the PPA compared to the Approved Project. Specifically, Appendix Z of the EIR Addendum states that "Maximum operational emissions would exceed the County's operational significance thresholds for … PM_{10}." (See Appendix Z at page 21.)

For context, the Approved Project's FEIR previously determined that the Approved Project's operational impact to PM_{10} would be significant and unavoidable, both at the project-level and cumulatively (see Impacts AQ-2 and AQ-CUM-2 in Table S-1 of the Approved Project's FEIR). Similarly, Table 8 of Appendix C of the Proposed Project Amendment EIR Addendum depicts the operational emission of the PPA. As shown therein, the PPA would result in an exceedance of the County's pollutant threshold of 100 lbs/day of PM_{10}.

The net increase between the Approved Project and the PPA would be approximately 13.42 lbs/day of PM_{10}, an increase of approximately 14.3% compared to the Approved Project. This increase does not represent a new significant impact or a substantial increase in the severity of a previously identified significant environmental impact, but rather reflects the incremental increase in PM_{10} emissions attributable to vehicular activity associated with the PPA's additional residential units. Consistent with the findings presented in the Approved Project FEIR, there are no additional, feasible mitigation measures available to reduce the PM_{10} emissions.

Landslide

The Approved Project FEIR disclosed the presence of an historic landslide on the project site. Specifically, Appendix 4.1-6, Land Exchange Alternative Preliminary Geotechnical Report, prepared by Advanced Geotechnical Solutions, INC., notes in Section 4.1, Geological Analysis, subsection 4.1.2, Aerial Photograph Review, that "notable features observed include possible landslides…" (page 6). Section 4.3.1.3, Landslide Debris (Qls) stated that "Localized landslide debris is mapped in the central portion of Village 14, easterly superjacent to an active intermittent drainage…[and] geomorphic evidence suggests the presence of landslide debris." (page 8). To address the historic landslide, Section 4.6.1 recommends that "…mitigation of the postulated landslide would occur during development through removal of landslide debris during remedial grading and construction of a drained stabilization and buttress fills…[and] that removal of landslide debris and stabilization of affected slopes through construction of a drained buttress fill would reduce the potential impact to less than significant." (page 11). More specifically, Section 6.2, Slope Stability and Remediation, made the following recommendation: "In proposed development areas underlain by landslide debris, complete removal of compressible soils, where possible…[T]ypical remediation would consist of removing compressible debris/soils and constructing shear keys and buttress fills to mitigate future slope instability and settlement of unconsolidated landslide debris. Additional investigation and analysis will be required to determine depth and areal extent of removals and to define the geometry of the buttresses and

shear keys." Appendix 4.1-6 to the Approved Project FEIR concluded "In reviewing the current design with regard to the proposed development within the Land Exchange Alternative, it is AGS's opinion that the postulated landslide can be stabilized and reduce the impact to less than significant."

Under the terms of the Dispute Resolution Agreement, the geotechnical engineer (AGS) was able to perform field testing in 2019 in areas previously not authorized for access during preparation of the Approved Project's Final EIR. These findings were summarized in Appendix G, Geotechnical Technical Memorandum of the Proposed Project Amendment EIR Addendum. As further described therein,

> …the landslide debris varied from silty to sandy clay and clayey sand with common gravel near the toe of the landslide to breccia with sandy clay to clayey sand matrix in the upper portion of the landslide. The landslide debris is generally in a soft to moderately hard condition with abundant carbonate development. Thin, weakly developed and discontinuous shears were encountered at depths of 12 feet and 15 feet below ground surface in boring LD-1. The shears were observed to dip shallowly in a southeasterly direction and minor seepage/perched groundwater flowed into the excavation from above each shear. (page 9)

The landslide area analyzed in the Proposed Project Amendment Addendum is the same landslide area identified and evaluated in the Approved Project FEIR under the Land Exchange Alternative analysis. Accordingly, like the Approved Project FEIR, the analysis in the Proposed Project Amendment's EIR Addendum determined that "a large portion of the landslide debris would be removed to achieve design grades, and the remaining portions would be removed and the surrounding slopes would be constructed as drained buttress fills. By removing the ancient landslide and constructing drained buttress fill, the presence of landslides is anticipated to have a less than significant effect on the Proposed Project Amendment." This recommendation and determination are the same as those made in Appendix 4.1-6 of the Approved Project FEIR.

Biological Resources

Comments were raised related to biological impacts resulting from implementation of the Proposed Project Amendment These included questions related to the MSCP, vernal pools, and Quino checkerspot butterfly. The project biologist prepared a memorandum providing additional information on these items, which is included as Attachment 4, below. It is noted that in addition to the information specific to the Proposed Project Amendment, additional detailed biological resources information is included in the Approved Project's Final EIR, including Section 2.4, Biological Resources, Appendix 2.4-1, Biological Resources Technical Report, Section 4.8, Land Exchange Alternative and Appendix 4.1-3, LEA Biological Resources Technical Report, Section 8.4.1 through 8.4.4, Thematic Responses to Comments, and Volume II, Response to Comments.

Quino Checkerspot Butterfly Conservation Requirement (1993 Otay Ranch Program EIR)

The comment states that the 1993 Otay Ranch GDP/SRP Program EIR (the "1993 PEIR") requires that 100% (or approved HCP/MSCP standards) of occupied habitat for Quino checkerspot butterfly (QCB) be preserved. This requirement, however, must be considered within its proper and historical context. The 1993 PEIR was informed by the Otay Ranch Resource Management Plan (RMP), Phase 1, which the County adopted concurrently with the 1993 PEIR. The RMP states that although the QCB historically "had a wide distribution on Otay Ranch, it is either exceedingly restricted or absent from the ranch now." (RMP 1, p. 183.) The RMP indicates that QCB "apparently is locally extinct in San Diego County." (RMP 1, p. 27.)

Nevertheless, the RMP acknowledges that in years prior to 1993, QCB had been collected in a number of areas within Otay Ranch. (RMP 1, p. 181.) The RMP then concludes that the 11,375-acre Otay Ranch Preserve contains 100% of the areas where QCB had been observed in the past. This is made clear in Table 5 of the RMP, entitled "Sensitive Plant and Wildlife Species Present on Otay Ranch." The third column from the left identifies the "O. Ranch Distribution" and the fourth (last) column from the left describes the "% Retained in Preserve." (RMP 1, pp. 164, 167.) Regarding QCB, Table 5 indicates that the species' distribution is limited to blocks of habitat within the San Ysidro Mountains and the Jamul Mountains, and that "100%" of these areas are being retained in the Preserve. (RMP 1, p. 169.) This description is reinforced by the text of RMP 1, which states that the information in the table "is primarily a measure of the percentage of the area of the Otay Ranch distribution of each species included in the Preserve." (RMP 1, pp. 163, 177.)

In reality, the species can move and appear in different areas over time. It not unreasonable to expect that new or expanded populations could occur within Otay Ranch, both in areas approved for development and areas of Preserve. Thus, while the 1993 PEIR required preservation of 100 percent of occupied QCB habitat, it did so only to the extent such habitat was known or had been identified at that time, and was not intended to apply to all future areas the species may occupy. The parenthetical reference to "(or approved HCP/SMCP standards)" shows the County, when it adopted the RMP, understood that the status and location of the QCB might change and that the QCB might become subject to a federal Habitat Conservation Plan or Multiple Species Conservation Plan, each of which has the potential to include standards that would deviate from the 100 percent preservation threshold.

Note also that in 1993, the QCB was not on the federal list of endangered species. The USFWS listed the QCB in 1997 and designated critical habitat for the species in 2002, at which point all project-related impacts to the species and its critical habitat became subject to the analytical and mitigation requirements of the federal Endangered Species Act (FESA), as imposed by the relevant federal agencies. This fundamentally altered how impacts to QCB are addressed.

The Approved Project EIR provided more site specific analysis of impacts and potential mitigation than the Otay Ranch PEIR. These project specific mitigation measures are informed by and should be consistent with the PEIR mitigation measures, though they do not have to be identical provided the impacts identified are mitigated. Accordingly, specific mitigation measures were developed for QCB for the Approved Project, and they will also apply to the Proposed Project Amendment. Mitigation measure M-BI-8 requires the project applicant to obtain federal take authorization for impacts to QCB. Such authorization may be obtained through Section 7 or Section 10 of FESA, or through the MSCP Subarea Plan amendment process. In all cases, take authorization is conditioned on the applicant's compliance with any and all conditions, including preconstruction surveys, that the USFWS may require.

Furthermore, two mitigation measures – M-BI-9 and M-BI-10 – include management, monitoring, and restoration through implementation of the QCB Management Plan. In this regard, the County and the Applicant have been working collaboratively with the Wildlife Agencies to develop a QCB conservation strategy, regardless of the type of permit that is ultimately issued for the take of the species to attain the requirements of the MSCP or an HCP. For the Proposed Project Amendment, mitigation measure M-BI-10 has been updated to require that the QCB Management Plan incorporate the performance criteria/standards set forth in the February 2020 "Quino Checkerspot Conservation Strategy" and "Framework Management Plan," which HELIX Environmental prepared in cooperation the applicant, with the County, the United States

Fish and Wildlife Service, and the California Department of Fish and Wildlife. It is anticipated that the "Quino Checkerspot Conservation Strategy" and "Framework Management Plan" will be included as mitigation for the take authorization that the project applicant must obtain prior to any development occurring.

Thus, the Proposed Project Amendment is consistent with the 1993 PEIR in that it will mitigate project impacts on QCB through an approved take authorization process and the performance standards set forth therein, as required under the FESA.

Traffic

The Approved Project FEIR analyzed the traffic impacts of the Approved Project and various alternatives, including the EIR Land Exchange Alternative. That analysis determined that the Approved Project would generate 12,767 ADT, while the EIR Land Exchange Alternative would generate 13,917 external ADT. The Proposed Project Amendment would result in 12,962 ADT – 195 ADT more than the Approved Project. This represents a small (1.5%) increase over the Approved Project ADT, but a 7% reduction compared to the EIR Land Exchange Alternative's 13,917 ADT. Moreover, the Approved Project and the EIR Land Exchange Alternative, despite differing ADT figures, were determined in the Approved Project FEIR to both cause significant traffic impacts at the same roadway segments and intersections.

A traffic analysis was then conducted for the Proposed Project Amendment (Appendix S, Proposed Project Amendment Traffic Technical Memorandum). That analysis determined that the traffic impacts of the Proposed Project Amendment would be fewer and less severe than those of the EIR Land Exchange Alternative. For example, Section 2 of Appendix S states that,

> Significant impacts associated with both the Approved Project and the EIR Land Exchange Alternative were identified in the Final EIR. Moreover, *the Final EIR identified the exact same significant transportation related impacts for both the Approved Project and the EIR Land Exchange Alternative*. Therefore, *since the Proposed Project Amendment would generate fewer trips than the EIR Land Exchange Alternative, it is reasonable to conclude that the Proposed Project Amendment would result in the same or fewer transportation related significant impacts as those identified in the Final EIR*. (page 13, *emphasis added*)

Therefore, the analysis in the Proposed Project Amendment's Addendum determined that the "increase of [195] average daily trips would not result in a new significant impact or substantially increase the severity of impacts identified in the Final EIR," (Addendum p. 58) because (i) this increase in ADT was less than the EIR Land Exchange Alternative which resulted in the same impacts as the Approve Project, and (ii) because there are no substantial changes to the project traffic distribution patterns (i.e., Proctor Valley Road remains the primary ingress/egress) or new information that would change the distribution or baseline conditions. In fact, as noted in the EIR Addendum "Subsequent to the Final EIR analysis, the [Lyons Valley Road and SR-94 intersection] was signalized by the Jamul Casino in late 2018 and, as such, any impacts [i.e., **TR-9, 11, 13,** and **15)** to the intersection by the Proposed Project Amendment would be less than significant." (p. 58)

Energy

The Proposed Project Amendment, under the terms of the Dispute Resolution Agreement, would convert MSCP hardline development from R-14, -15 and -16 in Planning Area 16 (as well as PV1 and the majority of PV3) to a hardline Preserve designation and correspondingly result in a more consolidated and concentrated development footprint compared to the Approved Project. Further, like the Approved Project,

the Proposed Project Amendment would include two project design features that would reduce gasoline consumption during operation. They are summarized here for ease of reference:

PDF-AQ/GHG-10 **Electric Vehicle Charging Stations**. Prior to the issuance of residential building permits, the applicant or its designee shall submit plans for the installation of a dedicated 208/240 branch circuit in each garage of every residential unit and one Level 2 electric vehicle charging station in the garage in half of all residential units. Prior to the issuance of non-residential building permits, the applicant or its designee shall submit plans for the installation of 10 Level 2 electric vehicle charging stations in parking spaces located in the Village Core's commercial development area and P1 through P4 park areas.

PDF-TR-1 **Transportation Demand Management.** The applicant or its designee shall implement a Transportation Demand Management program to facilitate increased opportunities for transit, bicycling, and pedestrian travel, as well as provide the resources, means, and incentives for ridesharing and carpooling. The full description of this PDF can be found in the Approved Project's MMRP.

As to the energy conservation attributes of PDF-AQ/GHG-10, provision of on-site electric vehicle charging stations will facilitate and enable the transition of the statewide vehicle fleet *from* internal combustion engine vehicles that consume gasoline and diesel *to* zero emission vehicles that are powered by more efficient sources (e.g., electricity provided by utilities with an ever-increasing portfolio of renewable energy resources).

As to the energy conservation attributes of PDF-TR-1, the Transportation Demand Management Program was determined to result in a reduction in VMT by approximately 4.6% based on the EIR Land Exchange Alternative VMT analysis (Appendix P to Appendix 4.1-8 of the Approved Project FEIR).

Additionally, the Proposed Project Amendment's land use diversity allows for more efficient transportation patterns and choices within the Project Area. Specifically, the provision of resident-serving uses within the community allows for some resident needs to be met on site. This is reflected by a 12% internal capture of ADT as shown in Table 4: Project Trip Generation – Proposed Project Amendment of Appendix S of the EIR Addendum. It also should be remembered that the Proposed Project Amendment is part of a larger, master-planned community, as documented in the approved Otay Ranch General Development Plan/Otay Subregional Plan, Volume II (Otay Ranch GDP/SRP); therefore, the efficiencies of the Proposed Project Amendment's fuel consumption should be considered in light of the role that Village 14 and Planning Area 19 serves within the overall Otay Ranch community.

In light of the factors enumerated above, the Proposed Project Amendment's petroleum consumption would not be considered inefficient or wasteful and the EIR Addendum's conclusion is substantiated.

Planning and Zoning

MSCP Consistency

Regarding the Proposed Project Amendments consistency with the MSCP and the areas commonly referred to as PV2 and PV3, please refer to the Approved Project's FEIR, Section 8.4.1 for information regarding the development of these parcels. Further, under the terms of the Dispute Resolution Agreement, the County is processing an amendment to the County MSCP Subarea Plan that would extend Take authorization to PV2 and the portion of PV3 proposed to be developed by the Proposed Project Amendment. While these

areas were not designated as Preserve under the MSCP, they were not provided the benefits of Take authorization; thus, an amendment to the MSCP is being processed to (1) clearly authorize Take in these areas and (2) conserve the remainder of PV3 (128 acres), PV1, and R-14, -15 and -16.

Affordable Housing

Regarding the County General Plan policy to require projects seeking General Plan Amendments to provide Affordable Housing, the Proposed Project Amendment is not a General Plan Amendment and does not require a specific affordable housing requirement. Importantly, the Proposed Project Amendment is consistent with the General Plan densities that were approved with the Otay Ranch General Development Plan/Subregional Plan in 1993, and no increase in density is proposed. Moreover, the Proposed Project Amendment is consistent with Policy H.1-7 because it provides a range of housing options, including multi-family housing, as contemplated by the General Plan. In addition, the County does not have an inclusionary housing ordinance and has not completed a nexus study in order to impose an ad hoc or project-specific affordable housing requirement. Development of the Project site was contemplated by, and part of, the 1993 GDP/SRP for Otay Ranch. The 1993 GDP/SRP is a comprehensive planning document for the entire Otay Ranch area and includes a Housing chapter. That Housing chapter identifies the particular locations within Otay Ranch where affordable housing is to be located -- e.g., within certain village cores -- and then assigns a range of housing types to the other parts of the planning area. Thus, by virtue of being including in the 1993 GDP/SRP, the Proposed Project has already contributed toward and accommodated the need for affordable housing. Policy H-1.9, even if applied to the Proposed Project, requires nothing more, as explained in Response GD-5, Response to Late Letter from Kathy Van Ness, Golden Door Properties, submitted to the administrative record by the project applicant in June 2019. For these reasons, the Proposed Project Amendment is consistent with the General Plan, and Policy H.1-9 does not apply to the Proposed Project Amendment.

Attachment 1

CEQA: 15162. Subsequent EIRs and Negative Declarations	
15162. (a) When an EIR has been certified or a negative declaration adopted for a project, no subsequent EIR shall be prepared for that project unless the lead agency determines, on the basis of substantial evidence in the light of the whole record, one or more of the following:	
(1) Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;	*The proposed PPA's footprint consists entirely of portions of the Approved Project footprint and portions of the Land Exchange Alternative footprint. In other words, no part of the PPA development lies outside the respective development footprints of the Approved Project and the Land Exchange Alternative, both of which were studied at a project-level of detail in the Final EIR. Consequently, each impact of the proposed PPA was assessed in the Final EIR, either as part of the Approved Project impact analysis (See FEIR Section 2.1 through 2.11 and 3.1.1 through 3.1.10, and FEIR appendices to Chapters 2 and 3) or as part of the Land Exchange Alternative analysis. (See FEIR Section 4.8, Analysis of the Land Exchange Alternative and FEIR appendices 4.1-1 through 4.1-15. See also County Responses to comments, thematic responses to comments (FEIR Section 8), PC and BOS hearing records, staff reports, late letter responses, applicant responses etc. that comprise the whole record.) The County, with assistance from the County's EIR consultants, reviewed each impact category that might be implicated by the PPA (e.g., air quality, biology, public services, etc.). Through that investigation, the County has determined that there have been no substantial changes to the project that require major revisions of the previous EIR due to the involvement of new significant environmental effects of a substantial increase in the severity of previously identified significant effects This conclusion is supported by 21 technical memorandums and reports to the EIR Addendum, and Table 1.*
(2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or Negative Declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;	*There have been no changes in circumstances under which the project is undertaken.*
Or	
(3) New information of substantial importance, which was not known and could not have been known with	*The County, with assistance from the County's EIR consultants, reviewed new information made available subsequent to the approval of the FEIR. Specifically, the*

the exercise of reasonable diligence at the time the previous EIR was certified as complete or the Negative Declaration was adopted, shows any of the following:	*County and its consultants reviewed the CDFW-prepared Land Conversion Evaluation (LCE), which assessed the biological impacts and benefits of the land exchange contemplated under the Proposed Project Amendment. The LCE referred to several years of biological studies conducted on the state-owned parcels that were included in the FEIR's analysis of the Land Exchange Alternative analysis. The LCE, however, did not include substantial new information that showed the Proposed Project Amendment would result in new or significantly greater impacts than analyzed in the FEIR. None of the other information reviewed by the County indicated a different conclusion. Thus, the County has determined that none of the information generated since the certification of the Final EIR meets the criteria for requiring the preparation of a subsequent EIR.*
(A) The project will have one or more significant effects not discussed in the previous EIR or negative declaration;	*The County, with assistance from the County's EIR consultants, reviewed each impact category that might be implicated by the PPA (e.g., air quality, biology, public services, etc.). Through that investigation, the County has determined that there is no new information of substantial importance that was not known or could not have been known showing that the proposed PPA will have one or more significant effects not discussed in the previous EIR. See Table 1. Again, as noted above, the proposed PPA consists of portions of the Approved Project footprint and the Land Exchange Alternative footprint, both of which were analyzed at a project-level of detail in the Final EIR. The County is not aware of any new information that suggests the Final EIR's analysis was incomplete or is no longer valid.*
(B) Significant effects previously examined will be substantially more severe than shown in the previous EIR;	*The County, with assistance from the County's EIR consultants, reviewed each impact category that might be implicated by the PPA (e.g., air quality, biology, public services, etc.). Through that investigation, the County has determined that there is no new information of substantial importance indicating that the PPA will cause the significant effects of the Approved Project and/or the Land Exchange Alternative, as previously examined, will be substantially more severe than discussed in the previous EIR. See Table 1.*
(C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or	*The County has determined that there is no new information of substantial importance indicating that mitigation measures or alternatives previously found not feasible would in fact be feasible and would substantially reduce one or more significant effects of the project but have not adopted as part of the PPA. No mitigation measures that the FEIR had determined were infeasible are now considered feasible to reduce an impact. Further, the Environmentally Superior Alternative is still considered infeasible.*
(D) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project	*The County has determined that there is no new information of substantial importance that would result in mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR that would substantially reduce one or more significant effects on the environment. Based on this finding, there are no "considerably different" mitigation measures for the project*

proponents decline to adopt the mitigation measure or alternative.	*proponent/applicant to consider, and thus none for proponent/applicant to accept or reject. Consequently, there are no new mitigation measures proposed for the PPA other than those previously analyzed and disclosed in the FEIR, including its discussion of the Land Exchange Alternative; however, several measures have included minor revisions, including M-BI-9 and M-BI-10, to account for differences in impacts between the PPA and the FEIR. It should be noted, however, that the Land Exchange Alternative included a specific mitigation measure related to bat roosts, which has been incorporated into the EIR Addendum for the PPA.*

TABLE 1

Approved Adara Project				Land Exchange Alternative	Proposed Project Amendment
Impact No.	**Impact**	**Mitigation**	**Conclusion**	**Impact(s) and Mitigation from Technical Reports**	**Impacts and Mitigation from Addendum and Technical Memoranda**
Significant and Unavoidable Impacts					
2.1 Aesthetics					
Project-Level Impacts					
Visual Character and/or Quality					
AE-1	Construction activities would result in the removal or substantial adverse change of one or more features that contribute to the valued visual character of the existing Proctor Valley landscape.	**M-AE-1** Stationary construction sites, staging, and storage areas within the Project Area shall be visually screened using temporary screening fencing. Fencing shall be of an appropriate design and color for each specific location to minimize the visibility of stationary construction sites, staging, and storage areas from off-site residential viewing locations. **M-AE-2** The applicant, or its designee, shall prepare a Landscape Master Plan. The Landscape Master Plan shall demonstrate compliance with Otay Ranch General Development Plan/Otay Subregional Plan policies pertaining to the use of landscape materials that are complementary to the existing natural setting and that reflect the natural environment. The Landscape Master Plan shall also demonstrate compliance with San Diego County General Plan Conservation and Open Space Element policies pertaining to the minimization of visual impacts through implementation and use of appropriate scale, materials, and design to complement the surrounding natural landscape. In addition, the Landscape Master Plan shall be consistent and in compliance with the Fire Protection Plan, the Preserve Edge Plan, the Water Conservation Plan, and the design guidelines specified in the Specific Plan. The Landscape Master Plan shall identify phasing of the Proposed Project and shall be consistent with the phasing plan included in the Specific Plan. The Landscape Master Plan shall be approved by the Director of Planning & Development Services (or his/her designee) prior to the issuance of grading permits.	Impacts would remain significant and unavoidable.	**M-AE-1** **M-AE-2** Impacts would be reduced compared to the Approved Project because the Development Footprint would be reduced; however, the same mitigation measure would apply. Impact would remain significant and unavoidable.	**M-AE-1** **M-AE-2** Impacts would be reduced compared to the Approved Project because the Development Footprint would be reduced; however, the same mitigation measure would apply. No new mitigation measures would be available under the Proposed Project Amendment to mitigate Impact AE-1.Impact would remain significant and unavoidable.
AE-2	Development of the Proposed Project would introduce features that would detract from or contrast with the existing visual character and/or quality of the existing Proctor Valley landscape.	**M-AE-1** **M-AE-2** No feasible mitigation measures exist to reduce identified impacts below a level of significance.	Impacts would remain significant and unavoidable.	**M-AE-1** **M-AE-2** No feasible mitigation measures exist to reduce identified impacts below a level of significance.	**M-AE-1** **M-AE-2** No feasible mitigation measures exist to reduce identified impacts below a level of significance. No new mitigation measures would be available under the Proposed Project Amendment to mitigate Impact AE-2.
Cumulative-Level Impacts					
Visual Character and/or Quality					
AE-CUM-1	The Proposed Project would result in a cumulatively considerable impact with regard to visual contrast with the existing visual character and/or quality of the existing Proctor Valley and surrounding area landscape.	**M-AE-1** **M-AE-2** No feasible mitigation measures exist to reduce identified impacts below a level of significance.	Impacts would remain significant and unavoidable.	**M-AE-1** **M-AE-2** No feasible mitigation measures exist to reduce identified impacts below a level of significance.	**M-AE-1** **M-AE-2** No feasible mitigation measures exist to reduce identified impacts below a level of significance. No new mitigation measures would be available under the Proposed Project Amendment to mitigate Impact AE-CUM-1.
2.2 Agricultural Resources					
Project-Level Impacts					
Farmland of Local Importance					
AG-1	The Proposed Project would result in loss of an agricultural resource for the potential production of coastal-dependent crops, due to its location in a coast area climate zone and because the Project	**M-AG-1** As required by the Otay Ranch General Development Plan/Otay Subregional Plan (Otay Ranch GDP/SRP), an Agricultural Plan shall be prepared by the Proposed Project applicant, or its designee, prior to approval of any Specific Plan affecting on-site agricultural resources and will be required for each subsequent development proposal (i.e., villages, Town Center, the Eastern Town Center, the University, and Rural Estate Planned Community). The Agricultural Plan	Impacts would remain significant and unavoidable.	**M-AG-1** Impacts would be reduced compared to the Approved Project because the Development Footprint would be reduced; however, the same mitigation measure would apply. Impact would remain significant and unavoidable.	**M-AG-1** Impacts would be reduced compared to the Approved Project because the Development Footprint would be reduced; however, the same mitigation measure would apply. No new mitigation measures would be available under the Proposed

TABLE 1

Approved Adara Project				Land Exchange Alternative	Proposed Project Amendment
Impact No.	**Impact**	**Mitigation**	**Conclusion**	**Impact(s) and Mitigation from Technical Reports**	**Impacts and Mitigation from Addendum and Technical Memoranda**
	Area contains soils applicable to Farmland of Local Importance.	shall indicate the type of agricultural activity allowed as an interim use. Specifications shall include buffering guidelines designed to prevent potential land use interface impacts related to noise, odors, dust, insects, rodents, and chemicals that may accompany agricultural activities and operations. Adequate buffering shall be provided between the proposed development area and the interim agriculture use. Buffering measures may include the following: (1) a 200-foot distance between property boundaries and agricultural operations; (2) if permitted interim agricultural uses require the use of pesticide, then commercially reasonable limits shall be placed on the time of day, the type of pesticide application, and the appropriate weather conditions under which such application may occur; (3) use of vegetation along the field edges adjacent to development that can be used for shielding (i.e., corn); and (4) notification of adjacent property owners of potential pesticide applications and use of fencing. The County of San Diego department with jurisdiction over these areas shall review the Agricultural Plan to verify that proposed guidelines are adequate to prevent impacts associated with incompatible land uses from occurring.			Project Amendment to mitigate Impact AG-1. Impact would remain significant and unavoidable.
Cumulative-Level Impacts					
Farmland of Local Importance					
AG-CUM-1	The Proposed Project would result in a cumulatively considerable loss of an agricultural resource for the potential production of coastal-dependent crops, due to its location in a coast area climate zone and because the Project Area contains soils applicable to Farmland of Local Importance.	**M-AG-1** No feasible mitigation measures exist to reduce identified impacts below a level of significance.	Impacts would remain significant and unavoidable.	**M-AG-1** No feasible mitigation measures exist to reduce identified impacts below a level of significance.	**M-AG-1** No feasible mitigation measures exist to reduce identified impacts below a level of significance. No new mitigation measures would be available under the Proposed Project Amendment to mitigate Impact AG-CUM-1.
2.3 Air Quality					
Project-Level Impacts					
Conformance to Federal and State Air Quality Standards					
AQ-1	Project-generated maximum daily construction emissions would exceed the construction thresholds for volatile organic compounds (VOC), nitrous oxides (NO_x), and carbon monoxide (CO), during one or more years of construction.	**M-AQ-1** Tier 4 Final Rock Crushing Equipment. Diesel-powered generators (engines greater than 750 horsepower) used for rock-crushing operations shall be equipped with Tier 4 Final engines. **M-AQ-2** Blasting and Rock Crushing Notification. Prior to construction activities, the applicant or its designee shall employ a construction relations officer who shall address community concerns regarding on-site construction activity. The applicant shall provide public notification in the form of a visible sign containing the contact information of the construction relations officer, who shall document complaints and concerns regarding on-site construction activity. The sign shall be placed in easily accessible locations along Proctor Valley Road and noted on grading and improvement plans. **M-AQ-3** Blasting and Rock Crushing Dust Controls. The following provisions shall be implemented to reduce emissions associated with blasting and rock crushing activities: a. During blasting activities, the construction contractor shall implement all feasible engineering controls to control fugitive dust including exhaust ventilation, blasting cabinets and enclosures, vacuum blasters, drapes, water curtains, or wet blasting. Watering methods, such as water sprays and water applications, also shall be implemented during blasting, rock	Impacts would remain significant and unavoidable.	**M-AQ-1** through **M-AQ-8** Implementation of mitigation measures M-AQ-1 through M-AQ-8 would reduce emissions; however, mitigated emissions of VOCs, NOx, CO, and PM10 would exceed thresholds. Because VOCs, NOx, CO, and PM10 emissions generated by the Land Exchange Alternative would exceed the County's thresholds, potential criteria air pollutant impacts generated by the Land Exchange Alternative would be ***significant and unavoidable***.	**M-AQ-1** through **M-AQ-8** The Proposed Project Amendment could potentially exceed the County's emissions thresholds for VOC, NO_x, CO, and PM_{10}. The Proposed Project Amendment would implement **M-AQ-1** through **M-AQ-8;** however, not all reductions would be quantifiable, so emissions are overestimated and emission would be further reduced on a daily basis, but not a level below significance. No new mitigation measures would be available under the Proposed Project Amendment to mitigate Impact AQ-1. Impacts would remain significant and unavoidable.

TABLE 1

Approved Adara Project				Land Exchange Alternative	Proposed Project Amendment
Impact No.	**Impact**	**Mitigation**	**Conclusion**	**Impact(s) and Mitigation from Technical Reports**	**Impacts and Mitigation from Addendum and Technical Memoranda**
		crushing, cutting, chipping, sawing, or any activity that would release dust particles to reduce fugitive dust emissions. b. During rock-crushing transfer and conveyance activities, material shall be watered prior to entering the crusher. Crushing activities shall not exceed an opacity limit of 20% (or Number 1 on the Ringelmann Chart) as averaged over 3 minutes in any period of 60 consecutive minutes, in accordance with San Diego Air Pollution Control District (SDAPCD) Rule 50, Visible Emissions. A qualified opacity observer shall monitor opacity from crushing activities once every 30 days while crushers are employed on site to ensure compliance with SDAPCD Rule 50. Water sprayers, conveyor belt enclosures, or other mechanisms shall be employed to reduce fugitive dust generated during transfer and conveyance of crush material. **M-AQ-4** Tier 4 Interim Construction Equipment. Prior to the commencement of any construction activities, the applicant or its designee shall provide evidence to the County of San Diego (County) that, for off-road equipment with engines rated at 75 horsepower or greater, no construction equipment shall be used that is less than Tier 4 Interim. An exemption from these requirements may be granted by the County in the event that the applicant documents that equipment with the required tier is not reasonably available and corresponding reductions in criteria air pollutant emissions are achieved from other construction equipment.[3] Before an exemption may be considered by the County, the applicant shall be required to demonstrate that three construction fleet owners/operators in the San Diego Region were contacted and that those owners/operators confirmed Tier 4 equipment could not be located within the San Diego region. **M-AQ-5** Construction Equipment Maintenance. The primary contractor shall be responsible for ensuring that all construction equipment is properly tuned and maintained in accordance with manufacturer's specifications before and for the duration of on-site operation. **M-AQ-6** Use of Electrical-Powered Equipment. Electrical hookups shall be provided on site for hand tools such as saws, drills, and compressors used for building construction to reduce the need for electric generators and other fuel-powered equipment. The use of electrical construction equipment shall be employed, where feasible. **M-AQ-7** Best Available Control Technology. Construction equipment shall be outfitted with best available control technology (BACT) devices certified by the California Air Resources Board. A copy of each unit's BACT documentation shall be provided to the County of San Diego at the time of mobilization of each applicable unit of equipment. **M-AQ-8** Haul Trucks. Haul truck staging areas shall be provided for loading and unloading soil and materials, and shall be located away from sensitive receptors at the furthest feasible distance.			
AQ-2	Project-generated maximum daily operational emissions would exceed the thresholds for VOC and PM_{10}.	**M-AQ-9** Facilitate Use of Electrical Lawn and Garden Equipment. Prior to the issuance of residential building permits, the applicant or its designee shall provide evidence to the County of San Diego that building design plans require that residential structures be equipped with outdoor/exterior electric outlets in the front and rear of the structure to facilitate use of electrical lawn and garden equipment.	Impacts would remain significant and unavoidable.	**M-AQ-9** and **M-AQ-10** Maximum operational emissions would exceed the County's operational significance thresholds for VOC and PM10; thresholds for NOx, CO, SOx, or PM2.5 would not be exceeded.	**M-AQ-9** and **M-AQ-10** The Proposed Project Amendment's maximum daily operational emissions would potentially exceed the County's emissions thresholds for VOC and PM_{10}. The Proposed Project Amendment would implement **M-AQ-9** and **M-AQ-10;**

[3] For example, if a Tier 4 Interim piece of equipment is not reasonably available at the time of construction and a lower tier equipment is used instead (e.g., Tier 3), another piece of equipment could be upgraded from a Tier 4 Interim to a higher tier (i.e., Tier 4 Final) or replaced with an alternative-fueled (not diesel-fueled) equipment to offset the emissions associated with using a piece of equipment that does not meet Tier 4 Interim standards.

TABLE 1

Approved Adara Project				Land Exchange Alternative	Proposed Project Amendment
Impact No.	**Impact**	**Mitigation**	**Conclusion**	**Impact(s) and Mitigation from Technical Reports**	**Impacts and Mitigation from Addendum and Technical Memoranda**
		M-AQ-10 LoImpact W-VOC/Green Cleaning Product Educational Program. Prior to the occupancy of any on-site development, the applicant or its designee shall provide evidence to the County of San Diego that the applicant/phase developer has developed a Green Cleaning Product and Paint education program to be made available at rental offices, leasing spaces, and/or on websites.			however, reductions are not readily quantifiable; therefore, impacts would remain significant and unavoidable. No new mitigation measures would be available under the Proposed Project Amendment to mitigate Impact AQ-2.
Cumulative Impacts					
Construction and Operation Emissions					
AQ-CUM-1	The Proposed Project has a significant direct impact on air quality with regard to construction-related emissions of VOC, NO_x, CO, and PM_{10} and, therefore, would also result in a significant cumulatively considerable net increase in those emissions.	**M-AQ-1 through M-AQ-8** No other feasible mitigation measures exist to reduce identified impacts below a level of significance.	Impacts would remain significant and unavoidable.	**M-AQ-1** through **M-AQ-8** Because the Land Exchange Alternative would generate VOC, NOx, CO, and PM10 emissions that exceed the County's thresholds after implementation of mitigation, and because other cumulative projects would have the potential to be constructed and operated in the Land Exchange Alternative's vicinity, cumulative construction and operational emissions could further exacerbate emissions.	**M-AQ-1** through **M-AQ-8** Project design features **PDF-AQ-1, PDF-AQ-2,** and mitigation measures **M-AQ-1** through **M-AQ-8** are provided; however, impacts would be cumulatively considerable and unavoidable during the short-term construction period. No new mitigation measures would be available under the Proposed Project Amendment to mitigate Impact AQ-CUM-1.
AQ-CUM-2	The Proposed Project has a significant direct impact on air quality with regard to operational-related emissions of VOC and PM_{10} and, therefore, would also result in a significant cumulatively considerable net increase in those emissions.	**M-AQ-9 and M-AQ-10** No other feasible mitigation measures exist to reduce identified impacts below a level of significance.	Impacts would remain significant and unavoidable.	**M-AQ-9** and **M-AQ-10** Specifically, the Land Exchange Alternative would result in … significant cumulative operational impacts associated with VOC and PM10 emissions…cumulative construction *and operational* emissions could further exacerbate emissions.	**M-AQ-9** and **M-AQ-10** Project design features **PDF-AQ/GHG-1** through **PDF-AQ/GHG-10, PDF-TR-1,** and mitigation measures **M-AQ-9** and **M-AQ-10** are provided; however, impacts would be cumulatively considerable and unavoidable during the operational period. No new mitigation measures would be available under the Proposed Project Amendment to mitigate Impact AQ-CUM-2.
2.8 Noise					
Off-Site Traffic Noise					
N-3	Roadway noise attributable to the Proposed Project would result in a substantial noise increase (more than 10 dBA) at residential receiver M8/R14, located north of the Proposed Project along Proctor Valley Road and west of Melody Road.	No feasible mitigation measures exist to reduce identified impacts below a level of significance.	Impacts would remain significant and unavoidable.	Land Exchange Alternative-related traffic noise impacts at existing off-site NSLU would be less than significant, with the exception of one location. At residences located along Proctor Valley Road north of the Land Exchange Alternative and west of Melody Road, a significant increase in traffic noise along this roadway segment would occur compared to existing traffic noise levels, because Proctor Valley Road currently experiences very low traffic volumes. Because there is no feasible mitigation for this exceedance, this impact is considered ***significant and unavoidable***.	Traffic noise impacts at existing off-site NSLU would be less than significant, with the exception of one location. At residences located along Proctor Valley Road north of the Proposed Project Amendment and west of Melody Road, a significant increase in traffic noise along this roadway segment would occur compared to existing traffic noise levels, because Proctor Valley Road currently experiences very low traffic volumes. Because there is no feasible mitigation for this exceedance, this impact is considered ***significant and unavoidable***. No new mitigation measures would be available under the Proposed Project Amendment to mitigate Impact N-3.
2.9 Transportation and Traffic					
Existing Plus Project					
Segments					
TR-1	During Existing Plus Project Build-Out conditions, the Proposed Project would have a significant project-specific impact to one roadway segment approximately 2,100 feet in length along Proctor Valley Road between Northwoods Drive and the City of Chula Vista boundary, located within the City of Chula Vista.	**M-TR-1:** Proctor Valley Road between Northwoods Drive and the City of Chula Vista boundary (Project-Specific Impact, City of Chula Vista): The Proposed Project applicant, or its designee, shall coordinate with the City of Chula Vista to widen the roadway segment of Proctor Valley Road between Northwoods Drive and the City of Chula Vista boundary from a two-lane roadway to a Class I Collector prior to issuance of a building permit for the 1,229th equivalent dwelling unit (EDU). (This mitigation measure applies under Existing Plus Project Build-Out (Impact TR-1), Year 2025 (Impact TR-3), Year 2030 Cumulative Conditions (Impact TR-5), and Year 2030 With Cumulative Conditions Plus Hypothetical Development of State Preserve Property (Impact TR-8). Under the Year 2025, Year 2030, and Year 2030	Impacts would be significant and unavoidable.	Impacts would be significant and unavoidable.	**M-TR-1:** Impacts would be significant and unavoidable. No new mitigation measures would be available under the Proposed Project Amendment to mitigate Impact TR-1.

TABLE 1

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Impact No.	**Impact**	**Mitigation**	**Conclusion**	**Impact(s) and Mitigation from Technical Reports**	**Impacts and Mitigation from Addendum and Technical Memoranda**
		With Cumulative Conditions Plus Hypothetical Development of State Preserve Property, the building permit threshold is the 563rd EDU.)			
Intersections					
TR-9	During Existing Plus Project Build-Out conditions, traffic associated with the Proposed Project would result in a significant direct impact at the intersection of SR-94 and Lyons Valley Road in the County.	**M-TR-2:** Intersection at SR-94 and Lyons Valley Road (Direct Impact, Cumulative Impact, Caltrans Facility: The Proposed Project applicant, or its designee, shall coordinate with Caltrans to install a traffic signal at the intersection of SR-94 and Lyons Valley Road prior to issuance of a building permit for the 741st EDU. (This mitigation measure applies under Existing Plus Project Build-Out (Impacts TR-9), Year 2025 (Impacts TR-11), Year 2030 Cumulative Condition (Impacts TR-13), and Year 2030 With Cumulative Conditions Plus Hypothetical Development of State Preserve Property (Impacts TR-15).)	Impacts would be significant and unavoidable	Impacts would be significant and unavoidable.	Intersection is signalized by Jamul Casino at the end of 2018. Impact is no longer significant.
TR-10	During Existing Plus Project Build-Out conditions, traffic associated with the Proposed Project would result in a significant Project-specific impact at the intersection of Northwoods Drive/Agua Vista Drive and Proctor Valley Road in the City of Chula Vista.	**M-TR-3:** Intersection at Northwoods Drive/Agua Vista Drive and Proctor Valley Road (Project-Specific Impact, City of Chula Vista): The Proposed Project applicant, or its designee, shall coordinate with the City of Chula Vista to install a traffic signal at the intersection of Northwoods Drive/Agua Vista Drive and Proctor Valley Road prior to issuance of a building permit for the 660th EDU. (This mitigation measure applies under Existing Plus Project Build-Out (Impacts TR-10), Year 2025 (Impacts TR-12), Year 2030 Cumulative Conditions (Impacts TR-14), and Year 2030 With Cumulative Conditions Plus Hypothetical Development of State Preserve Property (Impacts TR-24). Under the Year 2025, Year 2030 Cumulative Conditions, and Year 2030 With Cumulative Conditions Plus Hypothetical Development of State Preserve Property, the threshold is the 287th EDU.)	Impacts would be significant and unavoidable.	Impacts would be significant and unavoidable.	**M-TR-3:** Impacts would be significant and unavoidable. No new mitigation measures would be available under the Proposed Project Amendment to mitigate Impact TR-3.
Year 2025 Cumulative-Conditions Impacts					
Segments					
TR-2a, 2b	The Proposed Project would have a significant cumulative impact along the following four roadway segments of Proctor Valley Road during Year 2025 Cumulative Conditions: • Proctor Valley Road between the City of Chula Vista boundary and Project Driveway #1 • Proctor Valley Road between Project Driveway #1 and Project Driveway #2	**M-TR-4:** The Proposed Project applicant, or its designee, shall pay the appropriate County of San Diego Transportation Impact Fee (TIF) to reduce the Proposed Project's identified significant cumulative impact along the following four roadway segments of Proctor Valley Road: • Proctor Valley Road between the City of Chula Vista boundary and Project Driveway #1 (Year 2025, Year 2030) • Proctor Valley Road between Project Driveway #1 and Project Driveway #2 (Year 2025, Year 2030) • Proctor Valley Road between Project Driveway #2 and Project Driveway #3 (Year 2030) • Proctor Valley Road, between Project Driveway #3 to Project Driveway #4 (Year 2030) (This mitigation measure applies under Year 2025 and Year 2030 conditions.)	Impacts would be significant and unavoidable.	Impacts would be significant and unavoidable.	**M-TR-4:** Impacts would be significant and unavoidable between City of Chula Vista boundary and Street "A". No new mitigation measures would be available under the Proposed Project Amendment to mitigate Impact TR-2a. Note that the segment between Project Driveway #1 and Project Driveway #2 (as documented in the EIR and the LEA doesn't exist in the Proposed Project Amendment. Rather the impact will be between Chula Vista boundary and the 1st Project's driveway (Street "A").
TR-3	The Proposed Project would result in a significant project specific impact to one roadway segment at Proctor Valley Road between Northwoods Drive and the City of Chula Vista boundary, located within the City of Chula Vista, under Year 2025 Cumulative Conditions.	**M-TR-1** (described above)	Impacts would be significant and unavoidable.	Impacts would be significant and unavoidable.	**M-TR-1** Impacts would be significant and unavoidable. No new mitigation measures would be available under the Proposed Project Amendment to mitigate Impact TR-3.

TABLE 1

Approved Adara Project				Land Exchange Alternative	Proposed Project Amendment
Impact No.	**Impact**	**Mitigation**	**Conclusion**	**Impact(s) and Mitigation from Technical Reports**	**Impacts and Mitigation from Addendum and Technical Memoranda**
			Intersection		
TR-11	During Year 2025 conditions, the Proposed Project would have a significant cumulative impact on the intersection of SR-94 and Lyons Valley Road within the County of San Diego.	**M-TR-2** (described above)	Impacts would be significant and unavoidable.	Impacts would be significant and unavoidable.	Intersection is signalized by Jamul Casino at the end of 2018. Impact is no longer significant.
TR-12	During Year 2025 Cumulative Conditions, traffic associated with the Proposed Project would result in a significant Project-specific impact at the intersection of Northwoods Drive/Agua Vista Drive and Proctor Valley Road in Chula Vista.	**M-TR-3** (described above)	Impacts would be significant and unavoidable.	Impacts would be significant and unavoidable.	**M-TR-3** Impacts would be significant and unavoidable. No new mitigation measures would be available under the Proposed Project Amendment to mitigate Impact TR-12.
			Year 2030 Cumulative-Conditions Impacts		
			Segments		
TR-4a, 4b, 4c, 4d	The Proposed Project would have a significant cumulative impact along the following four roadway segments of Proctor Valley Road during Year 2030 Cumulative Conditions: • Proctor Valley Road between the City of Chula Vista boundary and Project Driveway #1 • Proctor Valley Road between Project Driveway #1 and Project Driveway #2 • Proctor Valley Road between Project Driveway #2 and Project Driveway #3 • Proctor Valley Road between Project Driveway #3 to Project Driveway #4	**M-TR-4** (described above)	Impacts would be significant and unavoidable.	Impacts would be significant and unavoidable.	Impacts would be significant and unavoidable between City of Chula Vista boundary and Street "A". No new mitigation measures would be available under the Proposed Project Amendment to mitigate Impact TR-4a, c. Note that the segment between Project Driveway #1 and Project Driveway #2 (as documented in the EIR and the LEA doesn't exist in the Proposed Project Amendment. Rather the impact will be between Chula Vista boundary and the 1st Project's driveway (Street "A") The impact between Project Driveway #3 and Project Driveway #4 is no longer a significant impact.
TR-5	During Year 2030 Cumulative Conditions, the Proposed Project would have a significant Project-specific impact to the roadway of Proctor Valley Road from Northwoods Drive to the City of Chula Vista boundary.	**M-TR-1** (described above)	Impacts would be significant and unavoidable.	Impacts would be significant and unavoidable.	**M-TR-1** Impacts would be significant and unavoidable. No new mitigation measures would be available under the Proposed Project Amendment to mitigate Impact TR-5.
			Intersections		
TR-13	During Year 2030 Cumulative Conditions, traffic associated with the Proposed Project would result in a significant cumulative impact at the intersection of SR-94 and Lyons Valley Road.	**M-TR-2** (described above)	Impacts would be significant and unavoidable.	Impacts would be significant and unavoidable.	**M-TR-2** Impacts would be significant and unavoidable. No new mitigation measures would be available under the Proposed Project Amendment to mitigate Impact TR-13.

TABLE 1

Approved Adara Project				Land Exchange Alternative	Proposed Project Amendment
Impact No.	**Impact**	**Mitigation**	**Conclusion**	**Impact(s) and Mitigation from Technical Reports**	**Impacts and Mitigation from Addendum and Technical Memoranda**
TR-14	During Year 2030 Cumulative Conditions, traffic associated with the Proposed Project would result in a significant Project-specific impact at the intersection of Northwoods Drive/Agua Vista Drive and Proctor Valley Road.	**M-TR-3** (described above)	Impacts would be significant and unavoidable.	Impacts would be significant and unavoidable.	**M-TR-3.** Impacts would be significant and unavoidable. No new mitigation measures would be available under the Proposed Project Amendment to mitigate Impact TR-13.
Year 2030 Cumulative Conditions Plus Hypothetical Development of State Preserve Property					
Segments					
TR-6a, 6b, 6c, 6d	The Proposed Project would cause significant cumulative impacts under Year 2030 With Cumulative Conditions Plus Hypothetical Development of State Preserve Property within San Diego County on the road segments along Proctor Valley Road, between: • City of Chula Vista boundary to Project Driveway No. 1 (LOS F); • Proctor Valley Road, between Project Driveway No. 1 to Project Driveway No. 2 (LOS F); • Proctor Valley Road, between Project Driveway No. 2 to Project Driveway No. 3 (LOS F); and • Proctor Valley Road, between Project Driveway No. 3 to Project Driveway No. 4 (LOS F).	**M-TR-5:** Proctor Valley Road, between the City of Chula Vista Boundary and Project Driveway No. 1 (Cumulative Impact, County of San Diego; Impact 6a): In the event development of the Rancho Jamul Preserve were to be approved, and construction commenced prior to buildout of the Proposed Project, to mitigate an over-capacity road segment, the project applicant, or it's designee, would be required to pay its fair-share of the costs to widen Proctor Valley Road from a 2-Lane Collector with Raised Median (2.2A) to a 4-Lane Major (4.1A). **M-TR-6:** Proctor Valley Road, between Project Driveway No. 1 and Project Driveway No. 2 (Cumulative Impact, County of San Diego; Impact 6b): In the event development of the Rancho Jamul Preserve were to be approved, and construction commenced prior to buildout of the Proposed Project, to mitigate an over-capacity road segment, the project applicant, or it's designee, would be required to pay its fair-share of the costs to widen Proctor Valley Road from a 2-Lane Collector with Raised Median (2.2A) to a 4-Lane Major (4.1A). **M-TR-7:** Proctor Valley Road, between Project Driveway No.2 Project Driveway No. 3 (Cumulative Impact, County of San Diego; Impact 6c): In the event development of the Rancho Jamul Preserve were to be approved, and construction commenced prior to buildout of the Proposed Project, to mitigate an over-capacity road segment, the project applicant, or it's designee, would be required to pay its fair-share of the costs to widen Proctor Valley Road from a 2-Lane Collector with Raised Median (2.2A) to a 4-Lane Major (4.1A). **M-TR-8:** Proctor Valley Road, between Project Driveway No. 3 and Project Driveway No. 4 (Cumulative Impact, County of San Diego; Impact 6d): In the event development of the Rancho Jamul Preserve were to be approved, and construction commenced prior to buildout of the Proposed Project, to mitigate an over-capacity road segment, the project applicant, or it's designee, would be required to pay its fair-share of the costs to widen Proctor Valley Road from a 2-Lane Collector with Raised Median (2.2A) to a 4-Lane Major (4.1A).	Impacts would be significant and unavoidable.	Impacts would be significant and unavoidable.	**M-TR-5** **M-TR-6** **M-TR-7** **M-TR-8** Impacts would be significant and unavoidable. No new mitigation measures would be available under the Proposed Project Amendment to mitigate Impact TR-6a, c. Note that the segment between Project Driveway #1 and Project Driveway #2 (as documented in the EIR and the LEA doesn't exist in the Proposed Project Amendment. Rather the impact will be between Chula Vista boundary and the 1st Project's driveway (Street "A")
TR-7	During Year 2030 With Cumulative Conditions Plus Hypothetical Development of State Preserve Property, the Proposed Project would result in a significant project specific impact to Proctor Valley Road, between Hunte Parkway and Northwoods Drive.	**M-TR-9:** Proctor Valley Road, between Hunte Parkway and Northwoods Drive (Project Specific Impact, City of Chula Vista): If development of the Rancho Jamul Preserve is approved, and construction commenced prior to buildout of the Proposed Project, the project applicant, or its designee, shall coordinate with the City of Chula Vista to widen Proctor Valley Road between Hunte Parkway and Northwoods Drive from a four-lane roadway to a six-lane Major Street, by the issuance of the building permit for the 487th equivalent dwelling unit.	Impacts would be significant and unavoidable.	Impacts would be significant and unavoidable.	**M-TR-9:** Impacts would be significant and unavoidable. No new mitigation measures would be available under the Proposed Project Amendment to mitigate Impact TR-7.
TR-8	During Year 2030 With Cumulative Conditions Plus Hypothetical Development of State Preserve Property, the Proposed Project would result in a significant project specific impact to Proctor Valley Road, between Northwoods Drive and the City of Chula Vista Boundary.	**M-TR-1** (described above)	Impacts would be significant and unavoidable.	Impacts would be significant and unavoidable.	**M-TR-1** Impacts would be significant and unavoidable. No new mitigation measures would be available under the Proposed Project Amendment to mitigate Impact TR-8.

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Impact No.	**Impact**	**Mitigation**	**Conclusion**	**Impact(s) and Mitigation from Technical Reports**	**Impacts and Mitigation from Addendum and Technical Memoranda**
			Intersections		
TR-15	During Year 2030 With Cumulative Conditions Plus Hypothetical Development of State Preserve Property, traffic associated with the Proposed Project would result in a significant cumulative impact at the intersection of SR-94 and Lyons Valley Road.	**M-TR-2** (described above)	Impacts would be significant and unavoidable.	Impacts would be significant and unavoidable.	Intersection is signalized by Jamul Casino at the end of 2018. Impact is no longer significant.
TR-16	During Year 2030 With Cumulative Conditions Plus Hypothetical Development of State Preserve Property, traffic associated with the Proposed Project would result in a significant cumulative impact at the intersection of Paseo Ranchero and East H Street.	**M-TR-15:** Intersection at Paseo Ranchero and East H Street (Project Specific Impact, City of Chula Vista): The Proposed Project applicant, or its designee, shall coordinate with the City of Chula Vista to restripe the eastbound approach to the intersection of Paseo Ranchero and East H Street to include an exclusive right-turn lane.	Impacts would be significant and unavoidable.	Impacts would be significant and unavoidable.	**M-TR-15:** Impacts would be significant and unavoidable. No new mitigation measures would be available under the Proposed Project Amendment to mitigate Impact TR-16.
TR-17	During Year 2030 With Cumulative Conditions Plus Hypothetical Development of State Preserve Property, traffic associated with the Proposed Project would result in a significant cumulative impact at the intersection of Proctor Valley Road and Project Driveway No. 1	**M-TR-10:** Proctor Valley Road and Project Driveway No. 1 (Cumulative Impact, County of San Diego): Signalization would mitigate the cumulative impact at the intersection. This impact would occur with the full development of the Proposed Project as well as the development of 74 additional units within the Rancho Jamul Preserve.	Impacts would be significant and unavoidable.	Impacts would be significant and unavoidable.	**M-TR-10:** Impacts would be significant and unavoidable. No new mitigation measures would be available under the Proposed Project Amendment to mitigate Impact TR-17.
TR-18	During Year 2030 With Cumulative Conditions Plus Hypothetical Development of State Preserve Property, traffic associated with the Proposed Project would result in a significant cumulative impact at the intersection of Proctor Valley Road and Project Driveway No. 2.	**M-TR-11:** Proctor Valley Road and Project Driveway No. 2 (Cumulative Impact, County of San Diego): Widening Proctor Valley Road from two to four lanes would mitigate the cumulative impact at this intersection. This impact would occur with the full development of the Proposed Project as well as the development of 1,083 additional units within the Rancho Jamul Preserve.	Impacts would be significant and unavoidable.	Impacts would be significant and unavoidable.	**M-TR-11:** Impacts would be significant and unavoidable. No new mitigation measures would be available under the Proposed Project Amendment to mitigate Impact TR-18.
TR-19	During Year 2030 With Cumulative Conditions Plus Hypothetical Development of State Preserve Property, traffic associated with the Proposed Project would result in a significant cumulative impact at the intersection of Proctor Valley Road and Project Driveway No. 3.	**M-TR-12:** Proctor Valley Road and Project Driveway No. 3 (Cumulative Impact, County of San Diego): Signalization would mitigate the cumulative impact at this intersection. This impact would occur with the full development of the Proposed Project as well as the development of 397 additional units within the Rancho Jamul Preserve.	Impacts would be significant and unavoidable.	Impacts would be significant and unavoidable.	**M-TR-12:** Impacts would be significant and unavoidable. No new mitigation measures would be available under the Proposed Project Amendment to mitigate Impact TR-19.
TR-20	During Year 2030 With Cumulative Conditions Plus Hypothetical Development of State Preserve Property, traffic associated with the Proposed Project would result in a significant cumulative impact at the intersection of Proctor Valley Road and Project Driveway No. 4.	**M-TR-13:** Proctor Valley Road and Project Driveway No. 4 (Cumulative Impact, County of San Diego): Signalization would mitigate the cumulative impact at this intersection. This impact would occur with the full development of the Proposed Project as well as the development of 563 additional units within the Rancho Jamul Preserve.	Impacts would be significant and unavoidable.	Impacts would be significant and unavoidable.	**M-TR-13:** Impacts would be significant and unavoidable. No new mitigation measures would be available under the Proposed Project Amendment to mitigate Impact TR-20.
TR-21	During Year 2030 With Cumulative Conditions Plus Hypothetical	**M-TR-14:** Proctor Valley Road and Project Driveway No. 5 (Cumulative Impact, County of San Diego): Signalization would mitigate the cumulative impact at this	Impacts would be significant and unavoidable.	Impacts would be significant and unavoidable.	**M-TR-14:** Impacts would be significant and unavoidable. No new mitigation measures would be available under the Proposed Project Amendment to mitigate Impact TR-21.

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Impact No.	**Impact**	**Mitigation**	**Conclusion**	**Impact(s) and Mitigation from Technical Reports**	**Impacts and Mitigation from Addendum and Technical Memoranda**
	Development of State Preserve Property, traffic associated with the Proposed Project would result in a significant cumulative impact at the intersection of Proctor Valley Road and Project Driveway No. 5.	intersection. This impact would occur with the full development of the Proposed Project as well as the development of 481 additional units within the Rancho Jamul Preserve.			
TR-22	During Year 2030 With Cumulative Conditions Plus Hypothetical Development of State Preserve Property, traffic associated with the Proposed Project would result in a significant project specific impact at the intersection of Mt. Miguel Road and East H Street.	**M-TR-16:** Intersection at Mt Miguel Road and East H Street (Project Specific Impact City of Chula Vista): The Proposed Project applicant, or its designee, shall coordinate with the City of Chula Vista to restripe the westbound approach to the intersection of Mt. Miguel Road and East H Street to include an exclusive right-turn lane prior to issuance of a building permit for the 638th equivalent dwelling unit.	Impacts would be significant and unavoidable.	Impacts would be significant and unavoidable.	**M-TR-16:** Impacts would be significant and unavoidable. No new mitigation measures would be available under the Proposed Project Amendment to mitigate Impact TR-22.
TR-23	During Year 2030 With Cumulative Conditions Plus Hypothetical Development of State Preserve Property, traffic associated with the Proposed Project would result in a significant project specific impact at the intersection of Lane Avenue and East H Street.	**M-TR-17:** Intersection at Lane Avenue and East H Street (Project Specific Impact City of Chula Vista): The Proposed Project applicant, or its designee, shall coordinate with the City of Chula Vista to adjust the median and restripe the westbound approach at the intersection of Lane Avenue and East H Street to include a second left-turn lane.	Impacts would be significant and unavoidable.	Impacts would be significant and unavoidable.	**M-TR-17:** Impacts would be significant and unavoidable. No new mitigation measures would be available under the Proposed Project Amendment to mitigate Impact TR-23.
TR-24	During Year 2030 With Cumulative Conditions Plus Hypothetical Development of State Preserve Property, traffic associated with the Proposed Project would result in a significant project specific impact at the intersection of Northwoods Drive/Agua Vista Drive and Proctor Valley Road.	**M-TR-3** (described above)	Impacts would be significant and unavoidable.	Impacts would be significant and unavoidable.	**M-TR-3:** Impacts would be significant and unavoidable. No new mitigation measures would be available under the Proposed Project Amendment to mitigate Impact TR-24.
SB 743 Land Use Project per Capita Analysis					
TR-25	Implementation of the Proposed Project would result in a potentially significant impact related to vehicle miles traveled (VMT) per capita because the Proposed Project VMT per capita would exceed the significance threshold suggested by the SB 743 Draft Proposal currently being circulated for public review and comment, not yet in effect.	No feasible mitigation measures exist to reduce identified impacts below a level of significance.	Impacts would be significant and unavoidable.	Impacts would be significant and unavoidable.	Impacts would be significant and unavoidable. No new mitigation measures would be available under the Proposed Project Amendment to mitigate Impact TR-25.

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Impact No.	**Impact**	**Mitigation**	**Conclusion**	**Impact(s) and Mitigation from Technical Reports**	**Impacts and Mitigation from Addendum and Technical Memoranda**
Less Than Significant Impacts (With Mitigation)					
2.3 Air Quality					
Project-Level Impacts					
Conformance to Federal and State Air Quality Standards					
AQ-1	Project-generated maximum daily construction emissions would exceed the construction thresholds for particulate matter less than or equal to 10 microns in diameter (PM_{10}) and particulate matter less than or equal to 2.5 microns in diameter ($PM_{2.5}$) during one or more years of construction.	**M-AQ-1 through M-AQ-8** (described above)	Impacts would be less than significant.	*Implementation of mitigation measures M-AQ-1 through M-AQ-8 would reduce emissions; however, mitigated emissions of VOCs, NOx, CO, and PM10 would exceed thresholds. Because VOCs, NOx, CO, and PM10 emissions generated by the Land Exchange Alternative would exceed the County's thresholds, potential criteria air pollutant impacts generated by the Land Exchange Alternative would be* **significant and unavoidable**	***M-AQ-1 through M-AQ-8****.*
Cumulative Impacts					
Construction and Operation Emissions					
AQ-CUM-1	The Proposed Project has a significant direct impact on air quality with regard to construction-related emissions of $PM_{2.5}$ and, therefore, could also result in a significant cumulatively considerable net increase in those emissions.	**M-AQ-1 through M-AQ-8** (described above)	Impacts would be less than significant.	N/A	***M-AQ-1 through M-AQ-8*** *(described above)*
2.4 Biological Resources					
Project-Level Impacts					
Sensitive Wildlife Species					
BI-1	Permanent Direct Impacts to potential Quino Checkerspot Butterfly Suitable Habitat The Proposed Project would result in the loss of 793.7 acres of Quino checkerspot butterfly potential habitat. Such impacts would be potentially significant.	**M-BI-3 Habitat Conveyance and Preservation**. Prior to the approval of the first Final Map for the Proposed Project, the Proposed Project applicant or its designee shall coordinate with the County of San Diego (County) to establish and/or annex the Project Area into a County-administered Community Facilities District to fund the ongoing management and maintenance of the Otay Ranch Resource Management Plan (RMP) Preserve. Prior to the recordation of the first Final Map within each development phase, the Proposed Project applicant shall convey land within the Otay Ranch RMP Preserve to the Otay Ranch Preserve Owner/Manager or its designee at 1.188 acres for each "developable acre" impacted, as defined by the Otay Ranch RMP. Based on the analysis in the Draft EIR, it is anticipated that the Proposed Project would convey a total of 776.8 acres, 426.7 acres of which is anticipated to be conveyed within Village 14 and Planning Areas 16/19. The actual conveyance will be based on the 1.188 mitigation ratio as determined at Final Map. The remaining acres of required conveyance would be met through off-site acquisitions within the Otay Ranch RMP, which would then be conveyed to the Otay Ranch RMP Preserve. In addition, the BMO analysis determined mitigation requirements for areas subject to the BMO (PV1, PV2 and PV3) are more stringent for certain types of habitat than the Otay Ranch RMP Preserve Conveyance Obligation. Accordingly, the BMO analysis identified an additional 24.6 acres of mitigation, beyond the 203.5 acres required by the Otay Ranch RMP Preserve Conveyance Obligation, for impacts in PV1, PV2 and PV3, for a total of 228.1 acres. The mitigation provided for impacts to PV1, PV2, and PV3 would be like-kind or up-tiered habitat. **M-BI-4 Biological Open Space Easement.** Areas of Conserved Open Space shall be preserved on site and shall either be added to the Otay Ranch Resource Management	Impacts would be less than significant.	IMPACT W-4 Mitigation Measures M-BI-3 (habitat conveyance and preservation) M-BI-4 (permanent fencing and signage) M-BI-7 (Quino checkerspot butterfly take authorization) M-BI-8 (Quino checkerspot butterfly habitat preservation) M-BI-9 (Quino checkerspot butterfly management/ enhancement plan)	**M-BI-3 (habitat conveyance and preservation).** Prior to the approval of the first Final Map for the Proposed Project, the Proposed Project applicant or its designee shall coordinate with the County of San Diego (County) to establish and/or annex the Project Area into a County-administered Community Facilities District to fund the ongoing management and maintenance of the Otay Ranch Resource Management Plan (RMP) Preserve. Prior to the recordation of the first Final Map within each development phase, the Proposed Project applicant shall convey land within the Otay Ranch RMP Preserve to the Otay Ranch Preserve Owner/Manager or its designee at 1.188 acres for each "developable acre" impacted, as defined by the Otay Ranch RMP. Based on the analysis in the ~~Draft~~ Addendum to the Final EIR, it is anticipated that the Proposed Project Amendment would be required to convey a total of ~~776.8~~ 556.6 acres, ~~426.7~~ 377 acres of which is anticipated to be conveyed on site ~~within Village 14 and Planning Areas 16/19~~. The actual conveyance will be based on the 1.188 mitigation ratio as determined at Final Map. The remaining acres of required conveyance would be met through off-site ~~acquisitions~~ conveyances to the Otay Ranch RMP Preserve in Planning Area 16 (58.3 acres) within the Otay Ranch RMP, which would then be conveyed to the Otay Ranch RMP Preserve and a conservation easement over land designated for development in Planning Area 16 (191.5 acres). The total habitat preservation (626.7 acres) would exceed the

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		Plan (RMP) Preserve (see M-BI-3), given to the City of San Diego to mitigate for impacts to Cornerstone Lands, or managed under a County of San Diego (County) approved RMP through the County biological open space easement to satisfy the additional mitigation requirements as a result of the BMO analysis. This easement shall be for the protection of biological resources, and all of the following shall be prohibited on any portion of the land subject to said easement: grading; excavating; placing soil, sand, rock, gravel, or other material; clearing vegetation; constructing, erecting, or placing any building or structure; vehicular activities; dumping trash; or using the area for any purpose other than as open space. Granting this biological open space easement shall authorize the County and its agents to periodically access the land to perform management and monitoring activities for species and habitat conservation. The only exceptions to this prohibition are the following: 1. Selective clearing of vegetation by hand to the extent required by written order of the fire authorities for the express purpose of reducing an identified fire hazard. Although clearing for fire management is not anticipated with the creation of this easement, such clearing may be deemed necessary in the future for the safety of lives and property. All fire clearing shall be pursuant to the applicable fire code of the fire authority having jurisdiction, and the Memorandum of Understanding dated February 26, 1997, between the wildlife agencies and the fire districts and any subsequent amendments thereto. 2. Activities conducted pursuant to a revegetation or habitat management plan approved by the Director of Department of Planning & Development Services. 3. Vegetation removal or application of chemicals for vector control purposes where expressly required by written order of the County of San Diego Department of Environmental Health. 4. Construction, use, and maintenance of multi-use, non-motorized trails. The applicant shall show the on-site biological open space easement on the Final Map and biological open space easement exhibit with the appropriate granting language on the title sheet concurrent with Final Map Review, then submit them for preparation and recordation with the Department of General Services, and pay all applicable fees associated with preparation of the documents. If areas of Conserved Open Space are managed through the County to provide for the long-term management of the proposed Conserved Open Space, an RMP shall be prepared and implemented prior to the approval of the Final Map. The RMP shall be submitted to the County and agencies for approval as required. The final RMP cannot be approved until the following has been completed to the satisfaction of the Director of Department of Planning & Development Services, and, in cases where the Director of the Department of Parks and Recreation has agreed to be the owner/manager, to the satisfaction of the Director of the Department of Parks and Recreation. 1. The RMP shall be prepared and approved pursuant to the most current version of the County of San Diego Biological Report Format and Content Requirements. 2. The biological open space easements shall be dedicated to ensure that the land is protected in perpetuity. 3. A resource manager shall be selected and evidence provided by the applicant as to the acceptance of this responsibility by the proposed resource manager,			acreage required by the mitigation ratio, as defined in the Otay Ranch RMP. In addition, the BMO ~~analysis~~ Findings determined mitigation requirements for areas subject to the BMO (PV1, PV2 and a 6.1-acre portion of PV3) are more stringent for certain types of habitat than the Otay Ranch RMP Preserve Conveyance Obligation. Accordingly, the BMO analysis Findings identified an additional ~~24.6~~ 11.4 acres of mitigation, beyond the ~~203.5~~ 52.4 acres required by the Otay Ranch RMP Preserve Conveyance Obligation, for impacts in ~~PV1,~~ PV2 and a portion of PV3, for a total of ~~228.1~~ 63.8 acres. The mitigation provided for impacts to ~~PV1,~~ PV2, and a portion of PV3 would be like-kind or up-tiered habitat. **M-BI-4 (biological open space easement)** **M-BI-5 (permanent fencing and signage)** **M-BI-7 (Quino checkerspot butterfly take authorization)** **M-BI-8 (Quino checkerspot butterfly habitat preservation)** **M-BI-9 (Quino checkerspot butterfly management/ enhancement plan**) The Proposed Project shall convey ~~350.7~~ 345.3 acres of potential habitat for Quino checkerspot butterfly on site. In addition, per M-BI-4, a biological open space easement shall be placed over ~~72.4~~ 24.5 acres of potential habitat within Conserved Open Space. Additional preservation of suitable habitat is provided by off-site Otay Ranch RMP Preserve in Planning Area 16 (58.3 acres) and a conservation easement over land designated for development in Planning Area 16 (191.5 acres). Therefore, ~~477.2~~ 619.6 acres of potential habitat for Quino checkerspot butterfly shall be conveyed to the Otay Ranch Resource Management Plan Preserve or not be impacted by the Proposed Project. ~~An additional 350.1 acres of conveyance is required for the Proposed Project's impacts and shall be selected to include suitable Quino checkerspot butterfly habitat. For the off-site mitigation parcel(s) to be acceptable as mitigation for sensitive plant and wildlife species, including Quino checkerspot butterfly, vegetation within the off-site parcel must be mapped and the site must have suitable habitat to support Quino checkerspot butterfly per the survey guidelines definition of habitat.~~ Thus, the Proposed Project shall provide mitigation acreage at a ratio in excess of 1:1 (preservation of 1 acre for every 1 acre of impact) and shall adequately mitigate impacts to potential Quino checkerspot butterfly habitat. This mitigation measure also satisfies the mitigation requirements for those portions of the Project Area subject to the Biological Mitigation Ordinance. These areas shall be managed under a Quino Checkerspot Butterfly Management/Enhancement Plan, as discussed further in M-BI-10. **M-BI-10 Quino Checkerspot Butterfly Management/Enhancement Plan.** Prior to the issuance of the first grading permit that impacts habitat identified as suitable for Quino checkerspot butterfly, the Proposed Project shall prepare a long-term Quino Checkerspot Butterfly

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		4. The RMP funding costs, including a PAR (Property Assessment Record) or other equally adequate forecast, shall be identified. The funding mechanism (endowment or other equally adequate mechanism) to fund annual costs for the RMP and the holder of the security shall be identified and approved by the County. 5. A contract between the applicant and County shall be executed for the implementation of the RMP. 6. Annual reports shall include an accounting of all required tasks and details of tasks addressed during the reporting period, and an accounting of all expenditures and demonstration that the funding source remains adequate. **M-BI-5** Permanent Fencing and Signage. To protect the Otay Ranch Resource Management Plan Preserve and areas of Conserved Open Space from entry upon occupancy of any housing units, an open space fence or wall shall be installed along all open space edges where open space is adjacent to residential uses, along internal streets, and as indicated in the Proctor Valley Village 14 and Preserve Edge Plan and Proposed Fencing, Preserve Signage, and Fuel Modification Zones. The barrier shall be a minimum construction of vertical metal fencing, but may be other suitable construction material, as approved by Department of Planning & Development Services and the Director of Parks and Recreation. To protect the Preserve from entry, informational signs shall be installed, where appropriate, along all open space edges where open space is adjacent to residential uses, along internal streets, and as indicated in the Proctor Valley Village 14 and Preserve Edge Plan. The signs must be corrosion resistant, a minimum of 6 inches by 9 inches, on posts not less than 3 feet in height from the ground surface, and state, "Sensitive Environmental Resources Protected by Easement. Entry without express written permission from the County of San Diego is prohibited." **M-BI-8** Quino Checkerspot Butterfly Take Authorization. The Project Applicant shall consult with USFWS to determine if take authorization is required for impacts to Quino checkerspot. If such take authorization is required, the Proposed Project Applicant or designee shall demonstrate, to the satisfaction of the Director of Planning & Development Services (or his/her designee) and prior to the issuance of the first grading permit that impacts suitable Quino checkerspot butterfly habitat, that it has secured from any necessary take authorization. Take authorization may be obtained through the Section 7 Consultation or Section 10 incidental take permit requirements. The Applicant will comply with any and all conditions, including preconstruction surveys, that the USFWS may require for take of Quino checkerspot butterfly pursuant to the FESA. If required as a permit condition, preconstruction surveys will be conducted in accordance with USFWS protocols unless the USFWS authorizes a deviation from those protocols. Take may also be obtained through the County of San Diego Multiple Species Conservation Program Subarea Plan Quino Checkerspot Butterfly Addition, if/when approved. If the Quino checkerspot butterfly is included as an addition to the South County MSCP, and the Applicant seeks take under the Quino Addition, the Applicant will comply with any and all conditions required under the County MSCP Subarea PlanQuino Checkerspot Butterfly Addition. **M-BI-9** Quino Checkerspot Butterfly Habitat Preservation. The Proposed Project shall convey 404.8 acres of potential habitat for Quino checkerspot butterfly. In addition, per M-BI-4, an open space easement shall be placed over 72.4 acres of potential habitat within Conserved Open Space. Therefore, 477.2 acres of potential habitat for Quino checkerspot butterfly shall be conveyed to the Otay Ranch Resource Management Plan Preserve or not be impacted by the Proposed			Management/Enhancement Plan ("QCB Management Plan"). The QCB Management Plan shall be based on, and incorporate the performance criteria/standards set forth in, the February 2020 "Quino Checkerspot Conservation Strategy" and "Framework Management Plan", which HELIX Environmental prepared in cooperation the applicant, with the County, the United States Fish and Wildlife Service, and the California Department of Fish and Wildlife. At a minimum that plan shall include focused surveys within suitable habitat in the Otay Ranch Resource Management Plan Preserve and Conserved Open Space to determine if the species and suitable host plants are present, and determine areas of potential habitat restoration. The QCB Management Plan~~plan~~ shall be submitted to and receive approval from the Director of the Department of Planning & Development Services (or her/his designee) and the Director of Parks and Recreation. Note, however, that should the applicant rely on a future County Multiple Species Conservation Program Subarea Plan Quino Checkerspot Butterfly Addition for take authorization the QCB Management Plan ~~The Quino Checkerspot Butterfly Management/Enhancement Plan~~ shall may either be superseded by or rendered unnecessary upon completion and adoption of ~~a~~ such future County Multiple Species Conservation Program Subarea Plan Quino Checkerspot Butterfly Addition. Adaptive management techniques shall be included in the plan, with contingency methods for changed circumstances. These measures shall ensure that the loss of habitat for the species related to the proposed development are adequately offset by measures that will enhance the potential for Quino checkerspot butterfly to occupy the Preserve, and shall provide data that will help the species recover throughout its range.

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		Project. An additional 350.1 acres of conveyance is required for the Proposed Project's impacts and shall be selected to include suitable Quino checkerspot butterfly habitat. For the off-site mitigation parcel(s) to be acceptable as mitigation for sensitive plant and wildlife species, including Quino checkerspot butterfly, vegetation within the off-site parcel must be mapped and the site must have suitable habitat to support Quino checkerspot butterfly per the survey guidelines definition of habitat. Thus, the Proposed Project shall provide mitigation acreage at a ratio in excess of 1:1 (preservation of 1 acre for every 1 acre of impact) and shall adequately mitigate impacts to potential Quino checkerspot butterfly habitat. This mitigation measure also satisfies the mitigation requirements for those portions of the Project Area subject to the Biological Mitigation Ordinance. These areas shall be managed under a Quino Checkerspot Butterfly Management/Enhancement Plan, as discussed further in M-BI-10. **M-BI-10** Quino Checkerspot Butterfly Management/ Enhancement Plan. Prior to the issuance of the first grading permit that impacts habitat identified as suitable for Quino checkerspot butterfly, the Proposed Project shall prepare a long-term Quino Checkerspot Butterfly Management/ Enhancement Plan. At a minimum that plan shall include focused surveys within suitable habitat in the Otay Ranch Resource Management Plan Preserve and Conserved Open Space to determine if the species and suitable host plants are present, and determine areas of potential habitat restoration. The plan shall be submitted to and receive approval from the Director of the Department of Planning & Development Services (or her/his designee) and the Director of Parks and Recreation. The Quino Checkerspot Butterfly Management/Enhancement Plan shall either be superseded or unnecessary upon completion and adoption of a future County Multiple Species Conservation Program Subarea Plan Quino Checkerspot Butterfly Addition. Adaptive management techniques shall be included in the plan, with contingency methods for changed circumstances. These measures shall ensure that the loss of habitat for the species related to the proposed development are adequately offset by measures that will enhance the potential for Quino checkerspot butterfly to occupy the Preserve, and shall provide data that will help the species recover throughout its range.			
BI-2	Permanent Direct Impacts to Habitat for Special-Status Wildlife Species Implementation of the Proposed Project would result in the direct loss of habitat, including breeding, nesting and foraging habitat, for some of the County of San Diego Group 1, Group 2, and SSC species. These species include the following: red diamond rattlesnake, western spadefoot, Cooper's hawk, southern California rufous-crowned sparrow, grasshopper sparrow, burrowing owl, red-shouldered hawk, turkey vulture, northern harrier, California horned lark, loggerhead shrike, coastal California gnatcatcher, western bluebird, common barn-owl, monarch, San Diego black-tailed jackrabbit, mule deer, cougar, American badger, San Diegan	**M-BI-1** Biological Monitoring. To prevent disturbance to areas outside the limits of grading, all grading shall be monitored by a biologist. Prior to issuance of land development permits, including clearing, grubbing, grading, and/or construction permits for any areas adjacent to the Otay Ranch Resource Management Plan (RMP) Preserve and the off-site areas, the Proposed Project applicant or its designee shall provide written confirmation that a biological monitor approved by the County of San Diego has been retained and shall be present during clearing, grubbing, and/or grading activities within sensitive resources. Biological monitoring shall include the following: a. Attend the preconstruction meeting with the contractor and other key construction personnel prior to clearing, grubbing, or grading to reduce conflict between the timing and location of construction activities with other mitigation requirements (e.g., seasonal surveys for nesting birds). b. Conduct meetings with the contractor and other key construction personnel describing the importance of restricting work to designated areas prior to clearing, grubbing, or grading. Perform weekly inspection of fencing and erosion control measures (daily during rain events) near proposed preservation areas.	Impacts would be less than significant.	IMPACT W-2 Mitigation Measures: M-BI-1 (biological monitoring) M-BI-3 (habitat conveyance and preservation) M-BI-4 (permanent fencing and signage) M-BI-5 (nesting bird survey) M-BI-12 (preconstruction bat survey) M-BI-13 (burrowing owl preconstruction survey)	**M-BI-1 (biological monitoring)** **M-BI-3 (habitat conveyance and preservation)** **M-BI-4 (biological open space easement)** **M-BI-5 (permanent fencing and signage)** **M-BI-6 (nesting bird survey)** **M-BI-13 (burrowing owl preconstruction survey)** **M-BI-22 (preconstruction bat survey)** No earlier than 30 days prior to the commencement of construction activities for each construction area, a preconstruction survey shall be conducted by a biologist to determine whether active roosts of special-status bats (including maternity roosts, non-maternity roosts, and winter hibernacula) are present in the eucalyptus trees in Village 14 Development Footprint. If roosts are detected during preconstruction surveys, the following avoidance measures will be implemented unless relocation and/or take is authorized under CESA, as required by applicable law. *Maternity Roosts.* If an active maternity roost is identified in these areas, the maternity roost will not be directly disturbed, and some construction activities, such as mass-grading or

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	tiger whiptail, rosy boa, long-eared owl, white-tailed kite, Blainville's horned lizard, Bell's sage sparrow, ferruginous hawk, pallid bat, western mastiff bat, western red bat, Yuma myotis, San Diego desert woodrat, big free-tailed bat, orangethroat whiptail, San Diego banded gecko, and Coronado skink (see Table 2.4-10).).	c. Discuss procedures/training for minimizing harm to or harassment of wildlife encountered during construction with the contractor and other key construction personnel prior to clearing, grubbing, or grading. d. Supervise and monitor vegetation clearing, grubbing, and grading to ensure against direct and indirect impacts to biological resources that are intended to be protected and preserved. e. Flush species (i.e., avian or other mobile species) from occupied habitat areas immediately prior to brush-clearing and earth-moving activities. f. Verify that the construction site is implementing the stormwater pollution prevention plan (SWPPP) best management practices. The SWPPP is described in further detail in M-BI-14. g. Periodically monitor the construction site in accordance with the Proposed Project's fugitive dust control plan. Periodically monitor the construction site to see that dust is minimized according to the fugitive dust control plan and that manufactured slopes are revegetated as soon as possible. h. Periodically monitor the construction site to verify that artificial security light fixtures are directed away from open space and are shielded. i. Oversee the construction site so that cover and/or escape routes for wildlife from excavated areas are provided on a daily basis. All steep trenches, holes, and excavations during construction shall be covered at night with backfill, plywood, metal plates, or other means, and the edges covered with soils and plastic sheeting such that small wildlife cannot access them. Soil piles shall be covered at night to prevent wildlife from burrowing in. The edges of the sheeting shall be weighed down by sandbags. These areas may also be fenced to prevent wildlife from gaining access. Exposed trenches, holes, and excavations shall be inspected twice daily (i.e., each morning and prior to sealing the exposed area) by a qualified biologist to monitor for wildlife entrapment. Excavations shall provide an earthen ramp to allow for a wildlife escape route. **M-BI-3** (described above) **M-BI-4** (described above) **M-BI-5** (described above) **M-BI-6** Nesting Bird Survey. To avoid any direct impacts to raptors and/or any migratory birds protected under the Migratory Bird Treaty Act, removal of habitat that supports active nests on the proposed area of disturbance shall occur outside of the nesting season for these species (January 15 through August 15, annually). If, however, removal of habitat on the proposed area of disturbance must occur during the nesting season, the Proposed Project applicant or its designee shall retain a biologist approved by the County of San Diego (County) to conduct a preconstruction survey to determine the presence or absence of nesting birds on the proposed area of disturbance. The preconstruction survey must be conducted within 72 hours prior to the start of construction, and the results must be submitted to the Director of Planning & Development Services for review and approval prior to initiating any construction activities. If nesting birds are detected, a letter report or mitigation plan, as deemed appropriate by the County, shall be prepared and include proposed measures to be implemented to ensure that disturbance of nesting activities are avoided. The report or mitigation plan shall be submitted to the County for review and approval and implemented to the satisfaction of the Director of Planning & Development Services (or her/his designee). The County's mitigation			other activities involving heavy equipment, within 300 feet of the maternity roost may be postponed or halted until the maternity roost is vacated and juveniles have fledged, as determined by the project biologist. The rearing season for native bat species in California is approximately April 1 through August 31. *Hibernacula or Non-Maternity Roosts.* If non-breeding bat roosts (hibernacula or non-maternity roosts) are found within the disturbance zone, the individuals shall be safely evicted, under the direction of the project biologist, by opening the roosting area to allow airflow through the cavity or other means determined appropriate by the project biologist (e.g., installation of one-way doors). If flushing species from tree roosts is required, this shall be done when temperatures are sufficiently warm for bats to exit the roost, because bats do not typically leave their roost daily during winter months. In situations requiring one-way doors, a minimum of 1 week shall pass after doors are installed and temperatures should be sufficiently warm (for winter hibernacula) for bats to exit the roost. This action should allow all bats to leave during the course of 1 week. If a roost needs to be removed and the project biologists determines that the use of one-way doors is not necessary, the roost shall first be disturbed following the direction of the project biologist at dusk to allow bats to escape during the darker hours. Once the bats escape, the roost site shall be removed or the construction disturbance shall occur the next day (i.e., there shall be no less or more than 1 night between initial disturbance and the roost removal).

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		monitor shall verify and approve that all measures identified in the report or mitigation plan are in place prior to and/or during construction. **M-BI-13** Burrowing Owl Preconstruction Survey. Prior to issuance of any land development permits, including clearing, grubbing, and grading permits, the Proposed Project applicant or its designee shall retain a County of San Diego (County)-approved biologist to conduct focused preconstruction surveys for burrowing owl. The surveys shall be performed no earlier than seven days prior to the commencement of any clearing, grubbing, or grading activities. If occupied burrows are detected, the County-approved biologist shall prepare a passive relocation mitigation plan subject to review and approval by the Wildlife Agencies (i.e., California Department of Fish and Wildlife and U.S. Fish and Wildlife Service) and the County, including any subsequent burrowing owl relocation plans to avoid impacts from construction-related activities.			
BI-3	Permanent Direct Impacts to Hermes Copper Butterfly Suitable Habitat: Although no Hermes copper butterfly were observed in the Project Area, there is the possibility that Hermes copper butterfly could use or occupy the site at some time in the future. The Proposed Project would result in impacts to 18 acres of habitat that could support future Hermes copper butterfly populations.	**M-BI-3** (described above) **M-BI-4** (described above) **M-BI-5** (described above)	Impacts would be less than significant.	IMPACT W-6 M-BI-3 (habitat conveyance and preservation) M-BI-4 (permanent fencing and signage)	**M-BI-3 (habitat conveyance and preservation)** **M-BI-4 (biological open space easement)** **M-BI-5 (permanent fencing and signage)**
BI-6	Permanent Direct Impacts to Golden Eagle: The Proposed Project would result in a potentially significant impact to 780.8 acres of suitable golden eagle foraging habitat.	**M-BI-3** (described above) **M-BI-4** (described above) **M-BI-5** (described above)	Impacts would be less than significant.	IMPACT W-3 M-BI-3 (habitat conveyance and preservation) M-BI-4 (permanent fencing and signage)	**M-BI-3 (habitat conveyance and preservation)** **M-BI-4 (biological open space easement)** **M-BI-5 (permanent fencing and signage)**
BI-7	Temporary Direct Impacts to Habitat for Special-Status Wildlife Species: The Proposed Project would result in potentially significant temporary direct impacts to habitat for special-status wildlife species (County Group 1 or state SSC animals), including individual amphibians, reptiles, and small mammals, from construction-related activities.	**M-BI-1** (described above) **M-BI-2** Temporary Construction Fencing. Prior to issuance of land development permits, including clearing, grubbing, grading, and/or construction permits, the Proposed Project applicant or its designee shall install prominently colored fencing and signage wherever the limits of grading are adjacent to sensitive vegetation communities or other biological resources, as identified by the qualified monitoring biologist. Fencing shall remain in place during all construction activities. All temporary fencing shall be shown on grading plans for areas adjacent to the Preserve and for all off-site facilities constructed within the Preserve. Prior to release of grading and/or improvement bonds, a qualified biologist shall provide evidence to the satisfaction of the Director of Planning & Development Services (or his/her designee) and the Director of Parks and Recreation that work was conducted as authorized under the approved land development permit and associated plans. **M-BI-6** (described above) **M-BI-12** Restoration of Temporary Impacts. The Proposed Project would result in temporary impacts to sensitive upland and jurisdictional aquatic resources along the off-site portions of Proctor Valley Road, as well as temporary impacts associated within on-site road development. Road development within Village 14 would include 3.7 acres of temporary impacts to sensitive resources and 6.6 acres within the Otay Ranch Resource Management Plan (RMP) Preserve. Within	Impacts would be less than significant.	IMPACT W-1 M-BI-1 (biological monitoring) M-BI-2 (temporary construction fencing) M-BI-5 (nesting bird survey) M-BI-11 (restoration of temporary impacts) M-BI-18 (noise)	**M-BI-1 (biological monitoring)** **M-BI-2 (temporary construction fencing)** **M-BI-6 (nesting bird survey)** **M-BI-12 (restoration of temporary impacts)** The Proposed Project would result in temporary impacts to sensitive upland and jurisdictional aquatic resources along the off-site portions of Proctor Valley Road, as well as temporary impacts associated within on-site road development. Road development within Village 14 would include 14.1 acres of temporary impacts to sensitive resources, ~~and~~ of which ~~6.6~~9.3 acres are within the Otay Ranch Resource Management Plan (RMP) Preserve. Within Planning Areas 16/19, there would be ~~3.4~~ 4.3 acres of temporary impacts, of which 3.4 acres are within the Otay Ranch RMP Preserve. Off-site temporary impacts to sensitive resources would total ~~4~~9.4 38.6 acres: 2.4 acres of temporary impacts to City of Chula Vista land and~~, 21.1~~ 17.8 acres of temporary impacts to City of San Diego Cornerstone Lands~~, and 25.9 acres of temporary impacts to California Department of Fish and Wildlife (CDFW) owned lands~~. In addition, there would be minor impacts to County of San Diego lands totaling 0.1 acres. Restoration

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		Planning Areas 16/19, there would be 3.4 acres of temporary impacts within the Otay Ranch RMP Preserve. Off-site temporary impacts to sensitive resources would total 49.4 acres: 2.4 acres of temporary impacts to City of Chula Vista land, 21.1 acres of temporary impacts to City of San Diego Cornerstone Lands, and 25.9 acres of temporary impacts to California Department of Fish and Wildlife (CDFW)-owned lands. In addition, there would be minor impacts to County of San Diego lands totaling 0.1 acres. Restoration areas may incorporate salvaged materials, such as seed collection and translocation of plant materials, as determined to be appropriate. The Proposed Project biologist shall review the plant materials prior to grading and determine if salvage is warranted. Prior to grading the Proposed Project, a Conceptual Upland and Wetlands Restoration Plan for impacts within County of San Diego shall be submitted to and receive approval from the Director of the Department of Planning & Development Services (or her/his designee) and the Director of Parks and Recreation. Prior to grading, a separate Conceptual Upland and Wetlands Restoration Plan shall also be prepared and submitted to each city's Development Services Director (or her/his designee) and CDFW for their approval. The Conceptual Upland and Wetlands Restoration Plans shall include the following to ensure the establishment of the restoration objectives: a 24- by 36-inch map showing the restoration areas, site preparation information, type of planting materials (e.g., species ratios, source, size of container), planting program, 80% relative native cover success criteria, 5-year monitoring plan, and detailed cost estimate. The cost estimate shall include planting, plant materials, irrigation, maintenance, monitoring, and report preparation. The report shall be prepared by a City of Chula Vista–, City of San Diego–, and County of San Diego–approved biologist and a California-licensed landscape architect. The habitat restored pursuant to the plan must be placed within an open space easement dedicated to the appropriate managing entity prior to or immediately following approval of the plan. **M-BI-18** Noise. Uses in or adjacent to the Otay Ranch Resource Management Plan (RMP) Preserve with impacts that are not reduced through implementation of the Preserve Edge Plan shall be designed to minimize potential noise impacts to surrounding wildlife species by constructing berms or walls adjacent to commercial areas and any other uses, such as community parks, that may introduce noises that could impact or interfere with wildlife use of the Otay Ranch RMP Preserve. Construction-related activities that are excessively noisy (e.g., clearing, grading, grubbing, or blasting) adjacent to breeding/nesting areas shall incorporate noise-reduction measures (described below) or be curtailed during the breeding/nesting season of sensitive bird species. There shall be no construction-related activities allowed during the breeding season of migratory birds or raptors (January 15 through August 31) or coastal California gnatcatcher (February 15 through August 31). The Director of Planning & Development Services may waive this condition, through written concurrence from the U.S. Fish and Wildlife Service and California Department of Fish and Wildlife (i.e., Wildlife Agencies), provided that no nesting or breeding birds are present within 300 feet of the construction activities (500 feet for raptors) based on a preconstruction survey. If construction-related activities that are excessively noisy (e.g., clearing, grading, grubbing, or blasting) occur during the period of February 15 through August 31, a County of San Diego (County)-approved biologist shall conduct preconstruction surveys in suitable nesting habitat adjacent to the construction area to determine the location of any active nests in the area. If the habitat is suitable for raptors, the				areas may incorporate salvaged materials, such as seed collection and translocation of plant materials, as determined to be appropriate. The Proposed Project biologist shall review the plant materials prior to grading and determine if salvage is warranted. Prior to grading the Proposed Project, a Conceptual Upland and Wetlands Restoration Plan for impacts within County of San Diego shall be submitted to and receive approval from the Director of the Department of Planning & Development Services (or her/his designee) and the Director of Parks and Recreation. Prior to grading, a separate Conceptual Upland and Wetlands Restoration Plan shall also be prepared and submitted to each city's Development Services Director (or her/his designee) ~~and CDFW~~ for their approval. The Conceptual Upland and Wetlands Restoration Plans shall include the following to ensure the establishment of the restoration objectives: a 24- by 36-inch map showing the restoration areas, site preparation information, type of planting materials (e.g., species ratios, source, size of container), planting program, 80% relative native cover success criteria, 5-year monitoring plan, and detailed cost estimate. The cost estimate shall include planting, plant materials, irrigation, maintenance, monitoring, and report preparation. The report shall be prepared by a City of Chula Vista–, City of San Diego–, and County of San Diego–approved biologist and a California-licensed landscape architect. The habitat restored pursuant to the plan must be placed within an open space easement dedicated to the appropriate managing entity prior to or immediately following approval of the plan. **M-BI-18 (noise)**

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		survey area shall extend to 500 feet from the impact area, and if the habitat is suitable only for nesting by non-listed and non-raptor avifauna, the survey area shall extend 50 to 300 feet from the impact area, depending on the habitat type. The survey shall begin not more than 3 days prior to the beginning of construction activities. If nesting birds are detected by the biologist, the following buffers shall be established: (1) no work within 50 feet of a non-listed and non-raptor avifauna nest; (2) no work within 300 feet of a federally or state-listed species, such as coastal California gnatcatcher; and (3) no work within 500 feet of a raptor nest. The buffer shall be flagged in the field and mapped on the construction plans. To the extent possible, the non-construction buffer zones shall be avoided until the nesting cycle is complete. However, it may be reasonable for the County to reduce these buffer widths depending on site conditions (e.g., the width and type of screening vegetation) or the existing ambient level of activity (e.g., existing level of human activity within the buffer distance). If construction-related activities must take place within these buffer widths, the Proposed Project applicant or its designee shall contact the County to determine how to best minimize impacts to nesting birds. Specific to coastal California gnatcatcher and nesting raptors, construction-related noise levels in coastal California gnatcatcher-occupied habitat within 500 feet of construction activity shall not exceed 60 A-weighted decibels equivalent continuous sound level (dBA Leq) or preconstruction ambient noise levels, whichever is greater. Proposed Project construction within 500 feet of occupied habitat shall occur outside of the breeding season, if possible. If necessary, construction activities during the breeding season shall be managed to limit noise levels in occupied habitat within 500 feet of the site, or noise attenuation measures, such as temporary sound walls, shall be implemented to reduce noise levels below 60 dBA Leq or below existing ambient noise levels, whichever is greater			
BI-8	Permanent Direct Impacts to Birds under the Migratory Bird Treaty Act: The Proposed Project would result in a potentially significant permanent direct impact if any active nests or the young of nesting special-status bird species are impacted.	**M-BI-1** (described above) **M-BI-6** (described above)	Impacts would be less than significant.	IMPACT W-5 M-BI-1 (biological monitoring) M-BI-5 (nesting bird survey)	**M-BI-1 (biological monitoring)** **M-BI-5 (nesting bird survey)**
BI-11	Temporary Indirect Impacts to Special-Status Wildlife Species: The Proposed Project would have potentially significant, temporary indirect impacts to avian foraging and wildlife access to foraging, nesting, and/or water resources.	**M-BI-1** (described above) **M-BI-2** (described above) **M-BI-14** SWPPP. Prior to issuance of grading permits in portions of the Development Footprint that are adjacent to the Preserve, the Proposed Project applicant or its designee shall develop a stormwater pollution prevention plan (SWPPP). The SWPPP shall be developed, approved, and implemented during construction to control stormwater runoff such that erosion, sedimentation, pollution, and other adverse effects are minimized. The following performance measures contained in the Proctor Valley Preserve Edge Plan shall be implemented to avoid the release of toxic substances associated with construction runoff: • Sediment shall be retained within the Development Footprint by a system of sediment basins, traps, or other appropriate measures. • Permanent energy dissipaters shall be included for drainage outlets. • The best management practices contained in the SWPPP shall include silt fences, fiber rolls, gravel bags, and soil stabilization measures such as erosion control mats and hydroseeding.	Impacts would be less than significant.	IMPACT W-7 M-BI-1 (biological monitoring) M-BI-2 (temporary construction fencing) M-BI-14 (SWPPP) M-BI-15 (erosion and runoff control) M-BI-16 (prevention of invasive plant species) M-BI-17 (prevention of chemical pollutants) M-BI-18 (noise)	**M-BI-1 (biological monitoring)** **M-BI-2 (temporary construction fencing)** **M-BI-14 (SWPPP)** **M-BI-15 (erosion and runoff control)** **M-BI-16 (prevention of invasive plant species)** **M-BI-17 (prevention of chemical pollutants)** **M-BI-18 (noise)**

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		The Project Area drainage basins shall be designed to provide effective water quality control measures, as outlined in the SWPPP. Design and operational features of the drainage basins shall include design features to provide maximum infiltration; maximum detention time for settling of fine particles; maximum distance between basin inlets and outlets to reduce velocities; and maintenance schedules for periodic removal of sedimentation, excessive vegetation, and debris. **M-BI-15** Erosion and Runoff Control. During construction, material stockpiles shall be placed such that they cause minimal interference with on-site drainage patterns. This shall protect sensitive vegetation from being inundated with sediment-laden runoff. Dewatering shall be conducted in accordance with standard regulations of the Regional Water Quality Control Board (RWQCB). A National Pollutant Discharge Elimination System permit, issued by RWQCB to discharge water from dewatering activities, shall be required prior to start of construction. This shall minimize erosion, siltation, and pollution within sensitive communities. Design of drainage facilities shall incorporate long-term control of pollutants and stormwater flow to minimize pollution and hydrologic changes. An Urban Runoff Plan and operational best management practices shall be approved by the San Diego County Department of Planning & Development Services prior to construction. **M-BI-16** Prevention of Invasive Plant Species. A County of San Diego (County)–approved plant list, as described in the Preserve Edge Plan, shall be used for areas immediately adjacent to the Preserve. All slopes immediately adjacent to the Preserve shall be planted with native species that reflect the adjacent native habitat. A hydroseed mix that incorporates native species, is appropriate to the area, and is without invasive species shall be used for slope stabilization in transitional areas. Per the Preserve Edge Plan, only County-approved vegetation shall be planted in streetscapes or within the 100-foot "edge" between development and the Otay Ranch Resource Management Plan Preserve. The Planning & Development Services Landscape Architect shall require that all final landscape plans comply with the following: no invasive plant species as included on the most recent version of the California Invasive Plant Council's California Invasive Plant Inventory for the Proposed Project region shall be included, and the plant palette shall be composed of native species that do not require high irrigation rates. The Proposed Project biologist shall periodically check landscape products for compliance with these requirements. **M-BI-17** Prevention of Chemical Pollutants. Weed control treatments shall include all legally permitted chemical, manual, and mechanical methods applied with the authorization of the County of San Diego (County) agriculture commissioner. The application of herbicides shall be in compliance with all state and federal laws and regulations under the prescription of a Pest Control Adviser and implemented by a licensed applicator. Where manual and/or mechanical methods are used, disposal of the plant debris shall follow the regulations set by the County agriculture commissioner. The timing of the weed control treatment shall be determined for each plant species in consultation with the Pest Control Adviser, the County agriculture commissioner, and the California Invasive Plant Council, with the goal of controlling populations before they start producing seeds. A manual weeding program shall be implemented on the manufactured slope adjacent to the Preserve to control weeds that are likely to be encouraged by irrigation within the 100-foot Preserve edge/fuel modification zone. Weed control efforts shall occur quarterly or as needed to prevent weeds on the manufactured slopes from moving into the adjacent Preserve. Either the homeowner's association or County's			

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		landscape monitoring firm shall be responsible to check the irrigated slopes during plant establishment to verify that excessive runoff does not occur and that any weed infestations are controlled. During Proposed Project operation, all recreational areas that use chemicals or animal by-products, such as manure, that are potentially toxic or impactive to sensitive habitats or plants shall incorporate best management practices on site to reduce impacts caused by the application and/or drainage of such materials into the Otay Ranch Resource Management Plan Preserve. In addition, use of rodenticides will not be allowed within the 100-foot Preserve edge. **M-BI-18** (described above)			
BI-12	Permanent Indirect Impacts to Special-Status Wildlife Species: The Proposed Project would have potentially significant, permanent indirect impacts to special-status wildlife species, including generation of fugitive dust; off-road-vehicle use; introduction of non-native, invasive plant and animal species; habitat fragmentation; increased human activity; alteration of the natural fire regime; noise; lighting; and altered hydrology.	**M-BI-5** (described above) **M-BI-14** (described above) **M-BI-15** (described above) **M-BI-16** (described above) **M-BI-17** (described above) **M-BI-19** Fire Protection. To minimize the potential exposure of the Project Area to fire hazards, all features of the Fire Protection Plan for Otay Ranch Village 14 and Planning Areas 16/19 shall be implemented in conjunction with development of the Proposed Project. **M-BI-20** Lighting. Lighting of all developed areas adjacent to the Otay Ranch Resource Management Plan Preserve shall be directed away from the Preserve, wherever feasible and consistent with public safety. Where necessary, development shall provide adequate shielding with non-invasive plant materials (preferably native), berming, and/or other methods to protect the Preserve and sensitive species from night lighting. Consideration shall be given to the use of loImpact W-pressure sodium lighting	Impacts would be less than significant.	IMPACT W-8 M-BI-4 (permanent fencing and signage) M-BI-14 (SWPPP) M-BI-15 (erosion and runoff control) M-BI-16 (prevention of invasive plant species) M-BI-18 (noise) M-BI-19 (fire protection) M-BI-20 (lighting)	**M-BI-5 (permanent fencing and signage)** **M-BI-14 (SWPPP)** **M-BI-15 (erosion and runoff control)** **M-BI-16 (prevention of invasive plant species)** **M-BI-18 (noise)** **M-BI-19 Fire Protection.** To minimize the potential exposure of the Project Area to fire hazards, all features of the Fire Protection Plan for Otay Ranch Village 14 and Planning Areas 16/19 and the Fire Protection Plan Technical Memorandum for the Otay Ranch Village 14 and Planning Areas 16/19 Proposed Project Amendment shall be implemented in conjunction with development of the Proposed Project Amendment. **M-BI-20 (lighting)**
N/A	Although the MSCP identifies San Diego fairy shrimp as a Covered Species, the County has taken the position that, based on a 2006 federal court decision, the plan's protections for this species are inadequate for purposes of providing FESA take coverage. Therefore, impacts to San Diego fairy shrimp or its habitat must be assessed and mitigated on a project-specific basis. The Proposed Project avoids all vernal pools/features that are known to be occupied by San Diego fairy shrimp. Consequently no significant impacts to San Diego fairy shrimp are expected. Nevertheless, the County is requiring a preventative mitigation measure for this species which, if a take permit is required, includes compliance with any permit conditions required by the USFWS for take of San Diego fairy shrimp.	**M-BI-7 San Diego Fairy Shrimp Take Authorization.** The Project Applicant shall consult with the USFWS if take authorization is required for impacts to San Diego fairy shrimp suitable habitat. If such take authorization is required, the Proposed Project Applicant or its designee shall demonstrate, to the satisfaction of the Director of Planning & Development Services (or his/her designee) and prior to the issuance of the first grading permit that impacts suitable San Diego fairy shrimp habitat, that it has secured from any necessary take authorization from the USFWS. Take authorization may be obtained through the Section 7 Consultation or Section 10 incidental take permit requirements. If required as a permit condition, preconstruction surveys for San Diego fairy shrimp will be a condition of this Project if required by the USFWS pursuant to the FESA. If required by the USFWS, the surveys shall be performed prior to the commencement of any clearing, grubbing, or grading activities. The preconstruction surveys will follow protocols set by the USFWS unless the USFWS authorizes a deviation from those protocols, as permitted under Section IX, subdivision a, of the "Survey Guidelines for the Listed Large Branchiopods," issued by USFWS on May 21, 2015. Note this measure will not apply to off-site areas under the jurisdiction of the City of San Diego or the City of Chula Vista. Take for San Diego fairy shrimp is provided by the City of San Diego's Vernal Pool Habitat Conservation Plan and the City of Chula Vista's Subarea Plan.		No Impact Preventative Measure: M-BI-7 (San Diego fairy shrimp take authorization)	Preventative Measure: **M-BI-7 (San Diego fairy shrimp take authorization)**

TABLE 1

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<tr><th colspan="4">Approved Adara Project</th><th>Land Exchange Alternative</th><th>Proposed Project Amendment</th></tr>
<tr><th>Impact No.</th><th>Impact</th><th>Mitigation</th><th>Conclusion</th><th>Impact(s) and Mitigation from Technical Reports</th><th>Impacts and Mitigation from Addendum and Technical Memoranda</th></tr>
<tr><td colspan="6">Sensitive Plant Species</td></tr>
<tr><td>BI-4</td><td>The Proposed Project would have potentially significant short-term direct impacts to known occurrences of County List A and B plant species, or those with a moderate to high potential to occur, at the edge of the construction and non-impacted areas interface (i.e., Otay Ranch RMP Preserve, Conserved Open Space, and non-graded LDA) (see Table 2.4-6).</td><td>M-BI-1 (described above)
M-BI-2 (described above)</td><td>Impacts would be less than significant.</td><td>IMPACT SP-1

M-BI-1 (biological monitoring)
M-BI-2 (temporary construction fencing)</td><td>M-BI-1 (biological monitoring)
M-BI-2 (temporary construction fencing)</td></tr>
<tr><td>BI-5</td><td>Permanent Direct Impacts to Special-Status Plant Species:
The Proposed Project would have potentially significant permanent direct impacts to San Diego marsh-elder (a non-Covered Species within the cities of San Diego and Chula Vista) (Table 2.4-7). Additional mitigation per the BMO analysis is required for San Diego goldenstar, barrel cactus, variegated dudleya, San Diego marsh-elder and Robinson’s peppergrass (Table 2.4-7).</td><td>M-BI-1 (described above)
M-BI-2 (described above)
M-BI-3 (described above)
M-BI-4 (described above)
M-BI-11 Biological Resource Salvage Plan. Mitigation requirements for the Proposed Project’s impacts on special-status plants are based on the analysis within Section 2.4.3.1 (BI-5) and the Biological Mitigation Ordinance (BMO) analysis provided in Appendix A of the Biological Resources Technical Report for the Proposed Project. Prior to the issuance of land development permits, including clearing or grubbing and grading permits, for areas with salvageable sensitive biological resources, including San Diego goldenstar, variegated dudleya, San Diego barrel cactus, San Diego marsh-elder, and Robinson’s pepper grass (including plant materials and soils/seed bank), the Proposed Project applicant or its designee shall prepare a Biological Resource Salvage and Restoration Plan. The Resource Salvage and Restoration Plan shall be prepared by a biologist approved by the City of Chula Vista and County of San Diego, to the satisfaction of the Development Services Director (or her/his designee) and in conjunction with the POM. Mitigation ratios for impacts to plant populations subject to the BMO are more robust than those required under the RMP. The mitigation for impacts to species subject to the BMO and the City of Chula Vista and County of San Diego subarea plans shall be provided as follows:
<table>
<tr><th>Species Scientific Name/ Common Name</th><th>Impacts</th><th>Mitigation Ratio</th><th>Mitigation Provided</th></tr>
<tr><td>Bloomeria clevelandii San Diego Goldenstar</td><td>17 individuals</td><td>3:1</td><td>51 individuals</td></tr>
<tr><td>Dudleya variegata Variegated dudleya</td><td>35 individuals</td><td>3:1</td><td>105 individuals</td></tr>
<tr><td>Ferocactus viridescens San Diego barrel cactus</td><td>36 individuals</td><td>2:1</td><td>70 individuals (2 individuals are preserved on site)</td></tr>
<tr><td>Iva hayesiana</td><td>1,057 individuals</td><td>1:1</td><td>1,057 individuals</td></tr>
</table></td><td>Impacts would be less than significant.</td><td>IMPACT SP-2

M-BI-1 (biological monitoring)
M-BI-2 (temporary construction fencing)
M-BI-3 (habitat conveyance and preservation)
M-BI-10 (biological resource salvage plan)</td><td>M-BI-1 (biological monitoring)
M-BI-2 (temporary construction fencing)
M-BI-3 (habitat conveyance and preservation)
M-BI-11 (biological resource salvage plan) Mitigation requirements for the Proposed Project’s impacts on special-status plants are based on the biological analysis for the Proposed Project ~~within Sections 5.2 and 6.2.2.1 (Impact SP-2) of this report,~~ and the Biological Mitigation Ordinance analysis ~~provided in Appendix A~~. Prior to the issuance of land development permits, including clearing or grubbing and grading permits, for areas with salvageable sensitive biological resources, including San Diego goldenstar~~, variegated dudleya, San Diego barrel cactus,~~ and San Diego marsh-elder ~~, and Robinson’s pepper grass~~ (including plant materials and soils/seed bank), the Proposed Project applicant or its designee shall prepare a Biological Resource Salvage and Restoration Plan. The Resource Salvage and Restoration Plan shall be prepared by a biologist approved by the City of Chula Vista and County of San Diego, to the satisfaction of the Development Services Directors (or her/his designee) and in conjunction with the POM. Mitigation ratios for impacts to plant populations subject to the BMO are more robust than those required under the RMP. The mitigation for impacts to species and vegetation communities subject to the RMP, BMO, and the City of Chula Vista and County of San Diego subarea plans shall be as follows:
<table>
<tr><th>~~Species Common Name (Scientific Name)~~</th><th>~~Impacts~~</th><th>~~Mitigation Ratio~~</th><th>~~Mitigation Provided~~</th></tr>
<tr><td>~~San Diego Goldenstar (Bloomeria clevelandii)~~</td><td>~~17 individuals~~</td><td>~~3:1~~</td><td>~~51 individuals~~</td></tr>
<tr><td>~~Variegated dudleya (Dudleya variegata)~~</td><td>~~35 individuals~~</td><td>~~3:1~~</td><td>~~105 individuals~~</td></tr>
</table></td></tr>
</table>

TABLE 1

<table>
<tr><th colspan="3">Approved Adara Project</th><th rowspan="2">Conclusion</th><th rowspan="2">Land Exchange Alternative
Impact(s) and Mitigation from Technical Reports</th><th rowspan="2">Proposed Project Amendment
Impacts and Mitigation from Addendum and Technical Memoranda</th></tr>
<tr><th>Impact No.</th><th>Impact</th><th>Mitigation</th></tr>
<tr><td></td><td></td><td>
<table>
<tr><td>San Diego marsh-elder</td><td></td><td></td><td></td></tr>
<tr><td>Lepidium virginicum var. robinsonii Robinson’s pepper-grass</td><td>112 individuals</td><td>2:1</td><td>218 individuals (6 individuals are preserved on site)</td></tr>
</table>
The Resource Salvage and Restoration Plan will also include compliance with the mitigation standards set forth in the RMP, including those related to restoration and translocation for San Diego goldenstar (translocation 758 of impacted individuals), San Diego marsh-elder in drainages (0.65 acres of impacts at a 2:1 ratio), and San Diego County needle grass (translocation of 93 impacted individuals). The mitigation requirements for variegated dudleya and San Diego barrel cactus are satisfied with the BMO mitigation requirements.
The Resource Salvage and Restoration Plan shall, at a minimum, evaluate options for plant salvage and relocation, including individual plant salvage, native plant mulching, selective soil salvaging, application of plant materials on manufactured slopes, and application/relocation of resources within the Otay Ranch Resource Management Plan Preserve. The Resource Salvage and Restoration Plan shall include incorporation of relocation and restoration efforts for San Diego goldenstar, San Diego County needle grass, variegated dudleya, San Diego goldenstar and San Diego barrel cactus, and include San Diego marsh-elder, and Robinson’s pepper-grass within restoration areas associated with M-BI-12 or other suitable sites within the Otay Ranch RMP Preserve. Relocation efforts may include seed collection and/or transplantation to a suitable receptor site, and shall be based on the most reliable methods of successful relocation. The program shall also include a recommendation for method of salvage and relocation/application based on feasibility of implementation and likelihood of success. The program shall include, at a minimum, an implementation plan, maintenance and monitoring program, estimated completion time, success criteria, and any relevant contingency measures to ensure that no-net-loss is achieved. The program shall also be subject to the oversight of the Development Services Director (or her/his designee). In addition to relocation of existing populations for San Diego goldenstar, variegated dudleya and San Diego barrel cactus, the Biological Resource Salvage and Restoration Plan shall also include additional plantings of these species to achieve a 3:1 and 2:1 mitigation ratio, respectively (see the table above).
If populations of San Diego marsh-elder, and Robinson’s pepper-grass are found within the off-site mitigation, preservation of these populations may be used for mitigation instead of restoration activities.
As required per RMP Policy 3.2, the Project Applicant will coordinate with the Otay Ranch POM to meet the restoration requirements for Munz’s sage and San Diego viguiera dominated coastal sage scrub.</td><td></td><td></td><td>
<table>
<tr><td>~~San Diego barrel cactus (*Ferocactus viridescens*)~~</td><td>~~36 individuals~~</td><td>~~2:1~~</td><td>~~70 individuals (2 individuals are preserved onsite)~~</td></tr>
<tr><td>~~San Diego marsh-elder (*Iva hayesiana*)~~</td><td>~~1,057 individuals~~</td><td>~~1:1~~</td><td>~~1,057 individuals~~</td></tr>
<tr><td>~~Robinson’s pepper-grass (*Lepidium virginicum* var. *robinsonii*)~~</td><td>~~112 individuals~~</td><td>~~2:1~~</td><td>~~218 individuals (6 individuals are preserved onsite)~~</td></tr>
</table>
<table>
<tr><th>Species Common Name (Scientific Name) or Vegetation Community</th><th>Impacts</th><th>Mitigation Requirement Source</th><th>Mitigation Ratio</th><th>Mitigation Provided/RMP Requirements</th></tr>
<tr><td>San Diego goldenstar (Bloomeria clevelandii)</td><td>727 individuals</td><td>RMP salvage and translocation requirement</td><td>1:1</td><td>727 individuals</td></tr>
<tr><td>San Diego marsh-elder (Iva hayesiana)</td><td>228 individuals</td><td>BMO Findings</td><td>1:1</td><td>228 individuals</td></tr>
<tr><td></td><td>33 individuals</td><td>Off-site impacts in City of Chula Vista and City of San Diego</td><td>1:1</td><td>33 individuals</td></tr>
<tr><td>San Diego marsh-elder within drainages</td><td>0.48 acres</td><td>RMP restoration and translocation requirement</td><td>2:1</td><td>0.96 acres</td></tr>
</table>
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<tr><td></td><td></td><td></td><td></td><td></td><td>
<table>
<tr><td>Munz's sage-dominated coastal sage scrub</td><td>0 acres</td><td>RMP restoration requirement</td><td>2:1</td><td>N/A</td></tr>
<tr><td>San Diego County viguiera-dominated coastal sage scrub</td><td>0 acres</td><td>RMP restoration requirement</td><td>2:1</td><td>N/A</td></tr>
</table>
The Resource Salvage and Restoration Plan will also include compliance with the mitigation standards set forth in the RMP, including those related to restoration and translocation for San Diego goldenstar (translocation ~~758—~~727 of impacted individuals)~~,~~ and San Diego marsh-elder in drainages (~~0.65~~ 0.48 acres of impacts at a 2:1 ratio)~~.~~ ~~, and San Diego County needle grass (translocation of 93 impacted individuals). The mitigation requirements for variegated dudleya and San Diego barrel cactus are satisfied with the BMO mitigation requirements.~~
The Resource Salvage and Restoration Plan shall, at a minimum, evaluate options for plant salvage and relocation, including individual plant salvage, native plant mulching, selective soil salvaging, application of plant materials on manufactured slopes, and application/relocation of resources within the Otay Ranch Resource Management Plan Preserve. The Resource Salvage and Restoration Plan shall include incorporation of relocation and restoration efforts for San Diego goldenstar~~, San Diego County needle grass, variegated dudleya and San Diego barrel cactus,~~ and include San Diego marsh-elder~~, and Robinson's pepper-grass~~ within restoration areas associated with M-BI-12 or other suitable sites within the Otay Ranch RMP Preserve. Relocation efforts may include seed collection and/or transplantation to a suitable receptor site, and shall be based on the most reliable methods of successful relocation. The program shall also include a recommendation for method of salvage and relocation/application based on feasibility of implementation and likelihood of success. The program shall include, at a minimum, an implementation plan, maintenance and monitoring program, estimated completion time, success criteria, and any relevant contingency measures to ensure that no-net-loss is achieved. The program shall also be subject to the oversight of the Development Services Director (or her/his designee). In addition to relocation of existing populations for San Diego goldenstar~~, variegated dudleya and San Diego barrel cactus~~, the Biological Resource Salvage and Restoration Plan ~~shall~~ may also include additional plantings of these species as necessary to achieve a ~~3:1 and 2:1~~ 1:1 mitigation ratio~~, respectively~~ (see the table above). ~~If populations of San Diego marsh-elder, and Robinson's pepper-grass are found within the off-site mitigation, preservation of these populations may be used~~</td></tr>
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TABLE 1

Approved Adara Project				Land Exchange Alternative	Proposed Project Amendment
Impact No.	**Impact**	**Mitigation**	**Conclusion**	**Impact(s) and Mitigation from Technical Reports**	**Impacts and Mitigation from Addendum and Technical Memoranda**
					~~for mitigation instead of restoration activities. As required per RMP Policy 3.2, the Project Applicant will coordinate with the POM to meet the restoration requirements for Munz's sage and San Diego viguiera dominated coastal sage scrub. This may require a separate plan than Biological Resource Salvage and Restoration Plan.~~
BI-9	Temporary Indirect Impacts to Special-Status Plant Species: The Proposed Project would have a potentially significant temporary indirect impact to special-status plant species in the Project Area from construction activities, and would include impacts related to, or resulting from, the generation of fugitive dust; changes in hydrology resulting from construction, including sedimentation and erosion; and the introduction of chemical pollutants (including herbicides).	**M-BI-1** (described above) **M-BI-2** (described above) **M-BI-14** (described above) **M-BI-15** (described above) **M-BI-17** (described above)	Impacts would be less than significant.	IMPACT SP-3 M-BI-1 (biological monitoring) M-BI-2 (temporary construction fencing) M-BI-14 (SWPPP) M-BI-15 (erosion and runoff control) M-BI-17 (prevention of chemical pollutants)	**M-BI-1 (biological monitoring)** **M-BI-2 (temporary construction fencing)** **M-BI-14 (SWPPP)** **M-BI-15 (erosion and runoff control)** **M-BI-17 (prevention of chemical pollutants)**
BI-10	Permanent Indirect Impacts to Special-Status Plant Species: The Proposed Project would have a potentially significant permanent indirect impact from the proximity of the Proposed Project to special-status plants after construction. Permanent indirect impacts that could affect special-status plant species include generation of fugitive dust, chemical pollutants, altered hydrology, non-native invasive species, increased human activity, and alteration of the natural fire regime.	**M-BI-5** (described above) **M-BI-15** (described above) **M-BI-16** (described above) **M-BI-17** (described above) **M-BI-19** (described above)	Impacts would be less than significant.	IMPACT SP-4 M-BI-4 (permanent fencing and signage M-BI-14 (SWPPP) M-BI-15 (erosion and runoff control) M-BI-16 (prevention of invasive plant species) M-BI-17 (prevention of chemical pollutants) M-BI-19 (fire protection)	**M-BI-5 (permanent fencing and signage** **M-BI-15 (erosion and runoff control)** **M-BI-16 (prevention of invasive plant species)** **M-BI-17 (prevention of chemical pollutants)** **M-BI-19 (fire protection)**
Riparian Habitat and Sensitive Natural Community and Jurisdictional Wetlands and Waterways					
BI-13	Temporary Direct Impacts to Riparian Habitat or Sensitive Vegetation Communities within the Project Area (including off-site impacts) The Proposed Project would have potentially significant, temporary direct impacts to vegetation communities from construction activities, including grading that would be restored following completion of the Proposed Project. Temporary impacts total 67.1 acres.	**M-BI-1** (described above) **M-BI-2** (described above) **M-BI-12** (described above) **M-BI-21** Federal and State Agency Permits. Prior to impacts occurring to U.S. Army Corps of Engineers (ACOE), Regional Water Quality Control Board (RWQCB), and California Department of Fish and Wildlife (CDFW) (collectively, the Resource Agencies) jurisdictional aquatic resources, the Proposed Project applicant or its designee shall obtain the following permits: ACOE 404 permit, RWQCB 401 Water Quality Certification, and CDFW Fish and Game Code 1600 Streambed Alteration Agreement. The overall ratio of wetland/riparian habitat mitigation shall be 3:1. Impacts shall be mitigated at a 1:1 impact-to-creation ratio by either the creation, or purchase of credits for the creation, of jurisdictional habitat of similar functions and values. An addition 2:1 enhancement-to-impact ratio shall be required to meet the overall 3:1 impact-to-mitigation ratio for impacts to wetlands/riparian habitat. Impacts to unvegetated and ephemeral stream channels shall occur at a 1:1 impact-to-	Impacts would be less than significant	IMPACT V-1 M-BI-1 (biological monitoring) M-BI-2 (temporary construction fencing) M-BI-11 (restoration of temporary impacts) M-BI-21 (federal and state agency permits)	**M-BI-1 (biological monitoring)** **M-BI-2 (temporary construction fencing)** **M-BI-12 (restoration of temporary impacts)** **M-BI-21 (federal and state agency permits)**

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Impact No.	**Impact**	**Mitigation**	**Conclusion**	**Impact(s) and Mitigation from Technical Reports**	**Impacts and Mitigation from Addendum and Technical Memoranda**
		creation ratio. A suitable mitigation site shall be selected and approved by the Resource Agencies during the permitting process. If mitigation is proposed to occur within the Project Area or within the additional off-site areas needed for conveyance, then a Wetlands Mitigation and Monitoring Plan shall be prepared. Prior to issuance of land development permits, including clearing, grubbing, and grading permits for activities that would impact jurisdictional aquatic resources, the Proposed Project applicant shall prepare a Wetlands Mitigation and Monitoring Plan to the satisfaction of the Director of Planning & Development Services (or his/her designee), the Director of Parks and Recreation, ACOE, RWQCB, and CDFW. The Conceptual Wetlands Mitigation and Monitoring Plan shall, at a minimum, prescribe site preparation, planting, irrigation, and a 5-year maintenance and monitoring program with qualitative and quantitative evaluation of the revegetation effort and specific criteria to determine successful revegetation.			
BI-14	Permanent Direct Impacts to Sensitive Vegetation Communities within Village 14 and Planning Areas 16/19: The Proposed Project would have a potentially significant permanent, direct impacts to 689.7 acres of vegetation communities within Village 14 and Planning Areas 16/19.	**M-BI-1** (described above) **M-BI-2** (described above) **M-BI-3** (described above) **M-BI-4** (described above) **M-BI-5** (described above) **M-BI-21** (described above)	Impacts would be less than significant	IMPACT V-2 M-BI-1 (biological monitoring) M-BI-2 (temporary construction fencing) M-BI-3 (habitat conveyance and preservation) M-BI-4 (permanent fencing and signage) M-BI-21 (federal and state agency permits)	**M-BI-1 (biological monitoring)** **M-BI-2 (temporary construction fencing)** **M-BI-3 (habitat conveyance and preservation)** **M-BI-4 (biological open space easement)** **M-BI-5 (permanent fencing and signage)** **M-BI-21 (federal and state agency permits)**
BI-15	Off-Site Permanent and Temporary Direct Impacts to Sensitive Vegetation Communities: City of San Diego MSCP Cornerstone Lands: The Proposed Project would have potentially significant temporary and permanent direct impacts to lands in the MSCP City of San Diego Cornerstone Lands as a result of the improvements to Proctor Valley Road (11.1 acre of permanent impact and 21.1 acres of temporary impacts).	**M-BI-1** (described above) **M-BI-2** (described above) **M-BI-12** (described above) **M-BI-21** (described above)	Impacts would be less than significant	IMPACT V-3 M-BI-1 (biological monitoring) M-BI-2 (temporary construction fencing) M-BI-11 (restoration of temporary impacts) M-BI-21 (federal and state agency permits)	**M-BI-1 (biological monitoring)** **M-BI-2 (temporary construction fencing)** **M-BI-12 (restoration of temporary impacts)** **M-BI-21 (federal and state agency permits)**
BI-16	Off-Site Permanent and Temporary Direct Impacts to Sensitive Vegetation Communities: Lands within City of Chula Vista. The Proposed Project would have potentially significant temporary and permanent, direct impacts to lands in the City of Chula Vista as a result of the improvements to Proctor Valley Road (0.1 acre of permanent impacts and 2.3 acres of temporary impacts)	**M-BI-1** (described above) **M-BI-2** (described above) **M-BI-12** (described above) **M-BI-21** (described above)	Impacts would be less than significant	IMPACT V-4 M-BI-1 (biological monitoring) M-BI-2 (temporary construction fencing) M-BI-11 (restoration of temporary impacts) M-BI-21 (federal and state agency permits)	**M-BI-1 (biological monitoring)** **M-BI-2 (temporary construction fencing)** **M-BI-12 (restoration of temporary impacts)** **M-BI-21 (federal and state agency permits)**
BI-17	Off-Site Permanent and Temporary Direct Impacts to Sensitive Vegetation Communities: Off-Site Private Lands. The Proposed Project would have potentially significant temporary and permanent, direct impacts to lands in off-	**M-BI-1** (described above) **M-BI-2** (described above) **M-BI-12** (described above)	Impacts would be less than significant	IMPACT V-5/IMPACT V-6 M-BI-1 (biological monitoring) M-BI-2 (temporary construction fencing) M-BI-11 (restoration of temporary impacts)	**M-BI-1 (biological monitoring)** **M-BI-2 (temporary construction fencing)** **M-BI-12 (restoration of temporary impacts)**

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Impact No.	**Impact**	**Mitigation**	**Conclusion**	**Impact(s) and Mitigation from Technical Reports**	**Impacts and Mitigation from Addendum and Technical Memoranda**
	site private lands as a result of the improvements to Proctor Valley Road (0.2 acre of permanent impacts and 0.6 acres of temporary impacts).				
BI-18	Off-Site Permanent and Temporary Direct Impacts to Sensitive Vegetation Communities: County of San Diego Road Easement. The Proposed Project would have potentially significant temporary and permanent direct impacts to County roads as a result of the improvements to Proctor Valley Road North, less than 0.1 acres would be to sensitive upland communities (coastal sage scrub and grassland).	**M-BI-1** (described above) **M-BI-2** (described above) **M-BI-12** (described above)	Impacts would be less than significant	IMPACT V-7 M-BI-1 (biological monitoring) M-BI-2 (temporary construction fencing) M-BI-3 (habitat conveyance and preservation) M-BI-11 (restoration of temporary impacts)	**M-BI-1 (biological monitoring)** **M-BI-2 (temporary construction fencing)** **M-BI-12 (restoration of temporary impacts)**
BI-19	Off-Site Permanent and Temporary Direct Impacts to Sensitive Vegetation Communities: Off-Site CDFW Owned Lands: The Proposed Project would have potentially significant direct impacts to sensitive vegetation within CDFW-owned lands as a result of road grading (6.7 acres temporary and 9.1 acres permanent).	**M-BI-1** (described above) **M-BI-2** (described above) **M-BI-12** (described above) **M-BI-21** (described above)	Impacts would be less than significant	N/A	**N/A**
BI-20	Temporary Direct Impacts to Jurisdictional Aquatic Resources within the Project Area (including off site): The Proposed Project would have potentially significant temporary direct impacts to jurisdictional aquatic resources, primarily from construction activities (0.73 acres of wetlands/riparian habitat and 0.35 acres of non-wetland waters/streambed).	**M-BI-1** (described above) **M-BI-2** (described above) **M-BI-12** (described above) **M-BI-21** (described above)	Impacts would be less than significant	IMPACT V-10 M-BI-1 (biological monitoring) M-BI-2 (temporary construction fencing) M-BI-11 (restoration of temporary impacts) M-BI-21 (federal and state agency permits	**M-BI-1 (biological monitoring)** **M-BI-2 (temporary construction fencing)** **M-BI-12 (restoration of temporary impacts)** **M-BI-21 (federal and state agency permits**
BI-21	Permanent Direct Impacts to Jurisdictional Aquatic Resources within the Project Area (including off site): The Proposed Project would permanently impact 1.43 acres of non-wetland waters/streambed and open water as well as 1.45 acres of wetlands/riparian habitat within the Project Area.	**M-BI-21** (described above)	Impacts would be less than significant	IMPACT V-11 M-BI-21 (federal and state agency permits	**M-BI-21 (federal and state agency permits**
BI-22	Temporary Indirect Impacts to Jurisdictional Aquatic Resources within the Project Area (including off site): The Proposed Project would have potentially significant, temporary indirect impacts to jurisdictional resources in the	**M-BI-1** (described above) **M-BI-2** (described above) **M-BI-14** (described above) **M-BI-15** (described above) **M-BI-17** (described above)	Impacts would be less than significant	IMPACT V-12 M-BI-1 (biological monitoring) M-BI-2 (temporary construction fencing) M-BI-14 (SWPPP) M-BI-15 (erosion and runoff control)	**M-BI-1 (biological monitoring)** **M-BI-2 (temporary construction fencing)** **M-BI-14 (SWPPP)** **M-BI-15 (erosion and runoff control)** **M-BI-17 (prevention of chemical pollutants)**

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Approved Adara Project				Land Exchange Alternative	Proposed Project Amendment
Impact No.	**Impact**	**Mitigation**	**Conclusion**	**Impact(s) and Mitigation from Technical Reports**	**Impacts and Mitigation from Addendum and Technical Memoranda**
	Project Area from construction activities, including impacts related to or resulting from the generation of fugitive dust; changes in hydrology resulting from construction, including sedimentation and erosion; and the introduction of chemical pollutants (including herbicides).			M-BI-17 (prevention of chemical pollutants)	
BI-23	Permanent Indirect Impacts to Jurisdictional Aquatic Resources within the Project Area (including off site): The Proposed Project would have potentially significant, permanent indirect impacts that could affect jurisdictional resources, including generation of fugitive dust, introduction of chemical pollutants, altered hydrology, introduction of non-native invasive species, increased human activity, alteration of the natural fire regime, and shading..	**M-BI-5** (described above) **M-BI-14** (described above) **M-BI-15** (described above) **M-BI-16** (described above)) **M-BI-17** (described above)	Impacts would be less than significant	IMPACT V-13 M-BI-4 (permanent fencing and signage M-BI-14 (SWPPP) M-BI-15 (erosion and runoff control) M-BI-16 (prevention of invasive plant species) M-BI-17 (prevention of chemical pollutants)	**M-BI-5 (permanent fencing and signage** **M-BI-14 (SWPPP)** **M-BI-15 (erosion and runoff control)** **M-BI-16 (prevention of invasive plant species)** **M-BI-17 (prevention of chemical pollutants)**
BI-24	Temporary Indirect Impacts to Sensitive Vegetation Communities within the Project Area (including off site): The Proposed Project would have potentially significant, temporary indirect impacts to sensitive vegetation communities in the Project Area (including off-site areas) from construction activities, including impacts related to or resulting from the generation of fugitive dust; changes in hydrology resulting from construction, including sedimentation and erosion; and the introduction of chemical pollutants (including herbicides).	**M-BI-1** (described above) **M-BI-2** (described above) **M-BI-14** (described above) **M-BI-15** (described above) **M-BI-17** (described above) **M-BI-21** (described above)	Impacts would be less than significant	IMPACT V-8 M-BI-1 (biological monitoring) M-BI-2 (temporary construction fencing) M-BI-14 (SWPPP) M-BI-15 (erosion and runoff control) M-BI-17 (prevention of chemical pollutants) M-BI-21 (federal and state agency permits	**M-BI-1 (biological monitoring)** **M-BI-2 (temporary construction fencing)** **M-BI-14 (SWPPP)** **M-BI-15 (erosion and runoff control)** **M-BI-17 (prevention of chemical pollutants)** **M-BI-21 (federal and state agency permits**
BI-25	Permanent Indirect Impacts to Sensitive Vegetation Communities within the Project Area (including off site): The Proposed Project would have potentially significant, permanent indirect impacts resulting from the proximity of the Proposed Project (including off-site areas) to sensitive vegetation communities after construction (e.g., maintenance of roads, residential units, commercial space, school, parks, and trails).	**M-BI-5** (described above) **M-BI-14** (described above) **M-BI-15** (described above) **M-BI-16** (described above) **M-BI-17** (described above) **M-BI-19** (described above)	Impacts would be less than significant	IMPACT V-9 M-BI-4 (permanent fencing and signage) M-BI-14 (SWPPP) M-BI-15 (erosion and runoff control) M-BI-16 (prevention of invasive plant species) M-BI-17 (prevention of chemical pollutants) M-BI-18 (fire protection)	**M-BI-5 (permanent fencing and signage)** **M-BI-14 (SWPPP)** **M-BI-15 (erosion and runoff control)** **M-BI-16 (prevention of invasive plant species)** **M-BI-17 (prevention of chemical pollutants)** **M-BI-18 (fire protection)**

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Approved Adara Project				Land Exchange Alternative	Proposed Project Amendment
Impact No.	**Impact**	**Mitigation**	**Conclusion**	**Impact(s) and Mitigation from Technical Reports**	**Impacts and Mitigation from Addendum and Technical Memoranda**
Wildlife Movement and Nursery Sites					
BI-26	Temporary Direct Impacts to Habitat Connectivity and Wildlife Corridors: The Proposed Project would have potentially significant, temporary direct impacts to potential foraging and breeding habitat for species that use the Project Area (e.g., special-status birds), primarily resulting from construction activities.	**M-BI-1** (described above) **M-BI-2** (described above) **M-BI-12** (described above)	Impacts would be less than significant.	IMPACT WLC-1 M-BI-1 (biological monitoring) M-BI-2 (temporary construction fencing) M-BI-11 (restoration of temporary impacts)	**M-BI-1 (biological monitoring)** **M-BI-2 (temporary construction fencing)** **M-BI-12 (restoration of temporary impacts)**
BI-27	Temporary Indirect Impacts to Habitat Connectivity and Wildlife Corridors: The Proposed Project would have potentially significant temporary indirect impacts to habitat connectivity and wildlife corridors resulting from increased human activity, lighting, and noise during construction and Proposed Project occupancy.	**M-BI-1** (described above) **M-BI-2** (described above) **M-BI-18** (described above) **M-BI-20** (described above)	Impacts would be less than significant.	IMPACT WLC-2 M-BI-1 (biological monitoring) M-BI-2 (temporary construction fencing) M-BI-18 (noise) M-BI-20 (lighting)	**M-BI-1 (biological monitoring)** **M-BI-2 (temporary construction fencing)** **M-BI-18 (noise)** **M-BI-20 (lighting)**
BI-28	Permanent Indirect Impacts to Habitat Connectivity and Wildlife Corridors: The Proposed Project would have potentially significant permanent indirect impacts to habitat connectivity and wildlife corridors, including habitat fragmentation, human activity, lighting, and noise from the proposed urban development, recreational facilities, and human activity.	**M-BI-3** (described above) **M-BI-4** (described above) **M-BI-5** (described above) **M-BI-18** (described above) **M-BI-20** (described above)	Impacts would be less than significant.	IMPACT WLC-3 M-BI-3 (habitat conveyance and preservation) M-BI-4 (permanent fencing and signage) M-BI-18 (noise) M-BI-20 (lighting)	**M-BI-3 (habitat conveyance and preservation)** **M-BI-4 (biological open space easement)** **M-BI-5 (permanent fencing and signage)** **M-BI-18 (noise)** **M-BI-20 (lighting)**
2.5 Cultural Resources					
Archaeological Resources					
Construction Impacts					
CR-1	The Proposed Project's development activities could affect cultural resources within 50 feet of the Area of Direct Impact (ADI) or within resource-specific, predetermined buffers.	**M-CR-1** Temporary Fencing - To prevent inadvertent disturbance of archaeological sites within the avoidance areas (open space), temporary fencing shall be installed where resources are located within 50 feet of the ADI. The temporary fencing shall include the following requirements: • Prior to the commencement of any grading and/or clearing in association with the grading and/or improvement plan, temporary orange construction fencing shall be placed to protect archaeological sites from inadvertent disturbance within the avoidance areas (open space) and the unimpacted portions of sites outside of the ADI during earth-disturbing activities. Temporary fencing shall be installed prior to the pre-construction meeting and any clearing, grubbing, trenching, grading, or land disturbances; remain for the duration of earth-disturbing activities; and include the following: o Temporary fencing is required in all locations of the Proposed Project where proposed grading or clearing is within 50 feet of any archaeological site within avoidance areas (open space) or the unaffected portions of sites outside of the ADI.	Impacts would be less than significant.	Impacts to the importance of the sites is mitigated through application of measures that include curation or repatriation of all collected artifacts and documentation, and construction monitoring, along with erection of temporary fencing around unimpacted portions of the six sites (CA-SDI-6695B; CA-SDI-8086B; CA-SDI-11397; CA-SDI-12332; CA-SDI-12333; CA-SDI-12397) which are partially located in the open space preserve to prevent direct and indirect impacts during Land Exchange Alternative activities; temporary fencing along the ADI limits where sites are outside the Land Exchange Alternative boundary should also occur for those sites (CA-SDI-12321 and CA-SDI-12323) that fall within 50 feet of the ADI.	**M-CR-1:** Impacts would be reduced compared to the Approved Project because the Development Footprint would be reduced; however, the same mitigation measure would apply. Impact would be reduced to less than significant.

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Approved Adara Project				Land Exchange Alternative	Proposed Project Amendment
Impact No.	**Impact**	**Mitigation**	**Conclusion**	**Impact(s) and Mitigation from Technical Reports**	**Impacts and Mitigation from Addendum and Technical Memoranda**
		○ The placement of such fencing shall be approved by the County of San Diego (County). Upon approval, the fencing shall remain in place until the conclusion of grading activities, after which the fencing shall be removed. ○ Installation of temporary fencing shall require the presence of monitor(s) (Archaeological & Native American) pursuant to M-CR-2.			
CR-2	The Proposed Project has the potential to affect 57 cultural resources which, although not recommended as eligible for listing in the California Register of Historical Resources or the Local Register, are considered significant under the County's CEQA Guidelines.	**M-CR-2** Archaeological Monitoring - To mitigate for potential impacts to undiscovered buried archaeological resources in the Project Area, an archaeological monitoring program and potential data recovery program shall be implemented pursuant to the County of San Diego's Guidelines for Determining Significance and Report Format and Requirements for Cultural Resources and the California Environmental Quality Act (CEQA) and shall include the following requirements: a. Pre-Construction • The Project Applicant shall contract with a County approved archaeologist to perform Archaeological Monitoring. The Project Archaeologist shall contract with a Kumeyaay monitor to conduct Native American monitoring for the Proposed Project. • The pre-construction meeting shall be attended by the project Archaeologist, the Kumeyaay Native American monitor. b. Construction • Monitoring. Both the project archaeologist and Kumeyaay Native American monitor are to be on site during all earth-disturbing activities. The frequency and location of monitoring of native soils shall be determined by the project archaeologist and the Kumeyaay Native American monitor. The project archaeologist and the Kumeyaay Native American monitor shall evaluate fill soils to ensure that they are negative for cultural resources. • Inadvertent Discoveries: ○ The project archaeologist and the Kumeyaay Native American monitor have the authority to divert or temporarily halt ground disturbance operations in the area of the discovery. ○ The Project Archaeologist shall contact the County Archaeologist. ○ The Project Archaeologist, in consultation with the County Archaeologist and the Kumeyaay Native American monitor, shall determine the significance of discovered resources. ○ Construction activities shall be allowed to resume after the County Archaeologist has agreed with the significance evaluation. ○ Isolates and non-significant deposits shall be minimally documented in the field. If the isolates and non-significant deposits are not be collected by the project archaeologist, the Kumeyaay Native American monitor may collect the cultural material for transfer to a tribal curation facility or repatriation program. ○ If cultural resources are determined to be significant, a research design and data recovery program shall be prepared by the project archaeologist in consultation with the Kumeyaay Native American monitor and approved by the County archaeologist. The program shall include reasonable efforts to preserve (avoid)	Impacts would be less than significant.		**M-CR-2:** Impacts would be reduced compared to the Approved Project because the Development Footprint would be reduced; however, the same mitigation measure would apply. Impact would be reduced to less than significant.

TABLE 1

Approved Adara Project				Land Exchange Alternative	Proposed Project Amendment
Impact No.	**Impact**	**Mitigation**	**Conclusion**	**Impact(s) and Mitigation from Technical Reports**	**Impacts and Mitigation from Addendum and Technical Memoranda**
		unique cultural resources of sacred sites, to cap identified sacred sites or unique cultural resources and to place development over the cap if avoidance is infeasible; and to perform data recovery for non-unique cultural resources. The preferred option is preservation (avoidance). c. Human Remains. • The property owner or their representative shall contact the County coroner and the County Planning & Development Services staff archaeologist. • Upon identification of human remains, no further disturbance shall occur in the area of the find until the County coroner has made the necessary findings as to origin. • If the remains are determined to be of Native American origin, the most likely descendant (MLD), as identified by the Native American Heritage Commission (NAHC), shall be contacted by the property owner or their representative to determine proper treatment and disposition of the remains. • The immediate vicinity where the Native American human remains are located is not to be damaged or disturbed by further development activity until consultation with the MLD regarding their recommendations as required by California Public Resources Code, Section 5097.98, has been conducted. • California Public Resources Code, Section 5097.98; CEQA Guidelines, Section 15064.5; and California Health and Safety Code, Section 7050.5, shall be followed in the event that human remains are discovered. d. Rough Grading ▪ Upon completion of rough grading, a monitoring report identifying whether resources were encountered shall be prepared. A copy of the monitoring report shall be provided to any culturally affiliated tribe that requests a copy. e. Final Grading ▪ A final report substantiating that earth-disturbing activities are completed and whether cultural resources were encountered shall be prepared. A copy of the final report shall be submitted to the South Coastal Information Center (SCIC) and any culturally affiliated tribe that requests a copy. f. Disposition of Cultural Material. The final report shall include: ▪ Evidence that all prehistoric materials have been curated at a San Diego curation facility or tribal curation facility that meets federal standards according to Title 36, Part 79, of the Code of Federal Regulations or alternatively have been repatriated to a culturally affiliated tribe. ▪ Evidence that historic materials have been curated at a San Diego curation facility that meets federal standards according to Title 36, Part 79, of the Code of Federal Regulations.			
CR-3	The Proposed Project has the potential to affect one cultural resource (CA-SDI-12397 East) which has been determined	**M-CR-2** (described above) **M-CR-3** Data Recovery - To mitigate potential impacts to the eastern portion of sites CA-SDI-12397 and CA-SDI-12373, a phased data recovery program shall be	Impacts would be less than significant.	The ADI at CA-SDI-12397 consists of improvements to Proctor Valley Road, a major traffic circulation element, and therefore, no forms of preservation in place within the ADI are feasible.	Impact is avoided under the Proposed Project Amendment.

TABLE 1

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Impact No.	**Impact**	**Mitigation**	**Conclusion**	**Impact(s) and Mitigation from Technical Reports**	**Impacts and Mitigation from Addendum and Technical Memoranda**
	to be significant under CEQA and County guidelines, and eligible for listing in the California Register of Historical Resources and the Local Register.	implemented prior to construction by a County of San Diego (County)–approved archaeologist. The phased data recovery (prepared as a separate document) would involve either surface collection and curation/repatriation to prevent looting (CA-SDI-12373 (Locus A), or excavation of a series of shovel test pits (STPs) to identify subsurface deposits and then excavation of control units (CUs) within those areas where subsurface deposits are identified. The number of CUs to be excavated would depend on the quantity and variety of artifacts and features identified and the presence/absence of a midden deposit because the data potential of the site is contained within those components of the site. Archaeological materials recovered during the data recovery efforts shall be cleaned, sorted, cataloged, and analyzed following standard archaeological procedures and shall be documented in a data recovery report. Upon completion of fieldwork, the County-approved archaeologist shall submit a letter report summarizing the field work efforts and stating that the scientifically significant sample of the site has been recovered. Upon approval from the County archaeologist, construction may begin at this location		Mitigation of impacts to this resource can be achieved through a phased data recovery program to be implemented prior to construction of the road, as well as installation of temporary fencing around the non-impacted portions of the site, monitoring of ground disturbing activities within and near the site during construction, and curation or documentation of recovered materials and documentation. The phased data recovery (prepared as a separate document) would involve excavation of a series of STPs to identify subsurface deposits, then excavation of CUs with those areas where subsurface deposits are identified. The number of CUs to be excavated would depend upon the quantity and variety of artifacts and features identified and the presence/absence of a midden deposit, as the data potential of the site is contained within those components of the site. If no subsurface deposits are identified through excavation of the STPs, then excavation of CUs may not be warranted. All portions of the site outside of the ADI will be preserved in place without modification. **Sites CA-SDI-8086 and CA-SDI-21917** (or portions thereof) are within the development footprint and would be destroyed by Land Exchange Alternative implementation. This represents a significant impact to the resources under CEQA and County guidelines, which will require mitigation. Preservation in place, such as avoidance, placement in open space, or capping are the preferred mitigation options, as described in CEQA Guidelines Section 15126.4(b)(3)(B). If preservation is not feasible, data recovery excavation, curation of collected cultural materials, and monitoring during construction, will be implemented to reduce impacts to the resources to a less than significant level. All portions of CA-SDI-8086 outside of the ADI will be preserved in place without modification.	
CR-4	The Proposed Project has the potential to affect undiscovered cultural resources that may qualify as significant under the County's CEQA Guidelines.	**M-CR-2** (described above)	Impacts would be less than significant.	Monitoring of project-related ground disturbances in this area as part of the overall monitoring program, and collection and curation or repatriation of any artifacts which may be discovered will reduce potential impacts unknown cultural resources to less than significant	**M-CR-2:** Impacts would be reduced compared to the Approved Project because the Development Footprint would be reduced; however, the same mitigation measure would apply. Impact would be reduced to less than significant.
CR-5	If the Preserve Trails Option is selected, the Proposed Project has the potential to indirectly affect one cultural resource (CA-SDI-12373, Locus A) that has been determined to be significant under CEQA and County Guidelines and eligible for listing in the CRHR and local register.	**M-CR-3** (described above)	Impacts would be less than significant	One site, CA-SDI-12373, was determined significant under CEQA and eligible for listing in the CRHR (Criterion 4) and local register. This site is located within the trail easement; no construction work is proposed here. The site will be avoided by project design by placing it in open space and will not be impacted. Potential indirect impacts from looting by the public could occur as a result of increased access to the site. This potential impact can be mitigated through implementation of a surface collection and curation/repatriation (data recovery) of artifacts to prevent looting. Details of the data recovery efforts are included in the data recovery plan in Confidential Appendix F. With implementation of the mitigation, impacts to the site will be reduced to less than significant.	Impact is avoided under the Proposed Project Amendment.

TABLE 1

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Impact No.	**Impact**	**Mitigation**	**Conclusion**	**Impact(s) and Mitigation from Technical Reports**	**Impacts and Mitigation from Addendum and Technical Memoranda**
2.6 Geology and Soils					
Liquefaction					
GE-1	Liquefaction associated with seismic events could result in damage to structures and thereby impact human health and safety.	**M-GE-1** Prior to issuance of a grading permit, a final geotechnical report shall be prepared by a registered civil or geotechnical engineer. The report shall include any additional field efforts, including borings, sampling, and associated laboratory testing, to determine whether liquefaction, rockfall, landslides, and/or expansive soils are concerns for the Proposed Project. The report shall specify foundation designs that are adequate to preclude substantial damage to the proposed structures due to liquefaction. Mapping and evaluation of hard rock slopes shall be performed by an engineering geologist prior to and during site development. The report shall be submitted with the building plans, and all recommendations of the report shall be incorporated into the design of the buildings. Measures developed in the geotechnical report shall be based on site-specific conditions. Measures would likely include the following, which are provided as examples only: <u>Liquefaction</u> • Deposits of concern shall be over-excavated and recompacted. • Deposits of concern shall be replaced with engineered fill. • Fill shall be surcharged (temporary overloading with fill) to facilitate settlement. • Densification of deposits of concern shall be performed in place, potentially including any combination of placement of vibra-stone columns and use of wick and blanket drains, compaction grouting, and dynamic compaction. • Subdrains shall be incorporated. <u>Rockfall</u> Impacts related to rockfall are not anticipated; therefore, this example measure would only apply if unforeseen rockfall hazards are encountered during the clearing, grubbing, and grading stages of construction: • Scaling of the slope faces shall occur. • Construction of catchment areas or debris fences shall occur. • Removal of precariously situated boulders shall occur. <u>Landslides</u> Impacts related to landslides are not anticipated; therefore, this example measure would only apply if unforeseen landslides are encountered during the clearing, grubbing, and grading stages of construction: Design features to reduce the potential effects of landslides shall include remedial grading and removal of landslide debris or slope stabilization in the areas of proposed development. In areas where landslide debris would be left in place, the construction of buttress fills shall be required to mitigate the potential for instability of cut slopes composed of landslide debris. <u>Expansive Soil</u> Highly expansive soils (typically the upper 3 feet below finish grade) shall be removed and replaced with soils with low expansion potential, lime treatment shall be applied, or moisture conditioning shall occur, in accordance with the standards contained within the then-current edition of the California Building Code. Concrete slabs shall be used in structure foundations, as necessary.	Impacts would be less than significant.	Impacts would be reduced compared to the Approved Project because the Development Footprint would be reduced; however, the same mitigation measure would apply. Impact would be reduced to less than significant.	**M-GE-1:** Impacts would be reduced compared to the Approved Project because the Development Footprint would be reduced; however, the same mitigation measure would apply. Impact would be reduced to less than significant.

TABLE 1

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Impact No.	**Impact**	**Mitigation**	**Conclusion**	**Impact(s) and Mitigation from Technical Reports**	**Impacts and Mitigation from Addendum and Technical Memoranda**
			Landslides		
GE-2	Portions of the Project Area may be susceptible to rockfall, which could result in damage to structures, and thereby impact human health and safety.	**M-GE-1** (described above)	Impacts would be less than significant.	Impacts would be reduced compared to the Approved Project because the Development Footprint would be reduced; however, the same mitigation measure would apply. Impact would be reduced to less than significant.	**M-GE-1:** Impacts would be reduced compared to the Approved Project because the Development Footprint would be reduced; however, the same mitigation measure would apply. Impact would be reduced to less than significant.
GE-3	Construction of buildings on or within landslide debris, or downslope from landslides, could result in damage to structures and thereby impact human health and safety.	**M-GE-1** (described above)	Impacts would be less than significant.	Impacts would be reduced compared to the Approved Project because the Development Footprint would be reduced; however, the same mitigation measure would apply. Impact would be reduced to less than significant.	**M-GE-1:** Impacts would be reduced compared to the Approved Project because the Development Footprint would be reduced; however, the same mitigation measure would apply. Impact would be reduced to less than significant.
			Expansive Soils		
GE-4	Development in areas with high or very high soil expansion potential could result in damage to structures and thereby impact human health and safety.	**M-GE-1** (described above)	Impacts would be less than significant.	Impacts would be reduced compared to the Approved Project because the Development Footprint would be reduced; however, the same mitigation measure would apply. Impact would be reduced to less than significant.	**M-GE-1:** Impacts would be reduced compared to the Approved Project because the Development Footprint would be reduced; however, the same mitigation measure would apply. Impact would be reduced to less than significant.
			2.7 Greenhouse Gas Emissions		
			Construction and Operational Emissions		
GHG-1	The Proposed Project would generate GHG emissions that may have a significant impact on the environment.	**M-GHG-1** As to construction greenhouse gas (GHG) emissions, prior to the County of San Diego's (County) issuance of each grading permit, the Proposed Project applicant or its designee shall purchase and retire carbon offsets in a quantity sufficient to offset 100% of the Proposed Project's construction emissions (including sequestration loss from vegetation removal) associated with each such grading permit, consistent with the performance standards and requirements set forth below. **First,** "carbon offset" shall mean an instrument issued by any of the following: (i) the Climate Action Reserve, the American Carbon Registry, and Verra (previously, Verified Carbon Standard); or (ii) any registry approved by the California Air Resources Board (CARB) to act as a registry under the state's cap-and-trade program. **Second**, any carbon offset used to reduce the Proposed Project's GHG emissions shall be a carbon offset that represents the past or forecasted reduction or sequestration of one metric ton of carbon dioxide equivalent that is "not otherwise required" (CEQA Guidelines Section 15126.4(c)(3)). **Third**, "Proposed Project applicant" shall mean Jackson Pendo Development Company or its designee. **Fourth**, as to construction and from vegetation removal GHG emissions, prior to the County's issuance of each grading permit, the Proposed Project applicant or its designee shall provide evidence to the satisfaction of the Director of the Planning & Development Services Department (PDS) that the Proposed Project applicant has purchased and retired carbon offsets in a quantity sufficient to offset 100% of the construction GHG emissions and sequestration loss from vegetation removal generated by the Proposed Project, as associated with each such grading permit. The emissions reduction obligation associated with each grading permit shall be calculated by reference to the certified environmental impact report's Greenhouse Gas Emissions Technical Report (Appendix 2.7-1), which determined total construction-related emissions as equaling **22,760 metric tons of carbon dioxide equivalent** (MT CO_2e). This would increase to 22,769 MT CO_2e	Impacts would be less than significant.	M-GHG-1As to construction greenhouse gas (GHG) emissions, prior to the County of San Diego's (County) issuance of the first grading permit, the Land Exchange Alternative applicant or its designee shall purchase and retire carbon offsets in a quantity sufficient to offset 100% of the Land Exchange Alternative's construction emissions (including sequestration loss from vegetation removal) associated with each such grading permit, consistent with the performance standards and requirements set forth below. **First**, "carbon offset" shall mean an instrument issued by any of the following: (i) the Climate Action Reserve, the American Carbon Registry, and the Verified Carbon Standard, (ii) any registry approved by the California Air Resources Board (CARB) to act as a registry under the state's cap-and-trade program, or (iii) if no registry is in existence as identified in options (i) and (ii), above, then any other reputable registry or entity that issues carbon offsets. **Second**, any carbon offset used to reduce the Land Exchange Alternative's GHG emissions shall be a carbon offset that represents the past reduction or sequestration of one metric ton of carbon dioxide equivalent that is "not otherwise required" (CEQA Guidelines Section 15126.4(c)(3)). **Third**, "Land Exchange Alternative applicant" shall mean Jackson Pendo Development Company or its designee. **Fourth**, as to construction and vegetation removal, prior to the County's issuance of the Land Exchange Alternative's grading permit, the Land Exchange Alternative applicant or its designee shall provide evidence to the satisfaction of the	**M-GHG-1** **M-GHG-2** **M-GHG-3** **M-GHG-4**

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Impact No.	**Impact**	**Mitigation**	**Conclusion**	**Impact(s) and Mitigation from Technical Reports**	**Impacts and Mitigation from Addendum and Technical Memoranda**
		if the Proctor Valley Road North Option is selected. In making such a determination, the Director of the PDS shall require the Project applicant or its designee to provide an attestation or similar documentation from the selected registry(ies) that a sufficient quantity of carbon offsets meeting the standards set forth in this measure have been purchased and retired, thereby demonstrating that the necessary emission reductions are realized. **Fifth**, the purchased carbon offsets used to reduce construction and vegetation removal GHG emissions shall achieve real, permanent, quantifiable, verifiable, and enforceable reductions (California Health & Safety Code Section 38562(d)(1)). **Sixth**, all carbon offsets required to reduce the Proposed Project's construction and vegetation removal emissions shall be associated with reduction activities that are geographically prioritized according to the following locational attributes: (1) off-site, unincorporated areas of the County of San Diego; (2) off-site, incorporated areas of the County of San Diego; (3) off-site areas within California; (4) off-site areas within the United States; and (5) off-site international areas. As listed, geographic priorities would focus first on local reduction options (including projects and programs that would reduce GHG emissions) to ensure that reduction efforts achieved locally would provide cross-over, co-benefits related to other environmental resource areas. The Director of the PDS shall issue a written determination that offsets are unavailable and/or fail to meet the feasibility factors defined in CEQA Guidelines Section 15364 in a higher priority geographical category before allowing offsets from the next lower priority category. In making such a determination, the Director of the PDS shall consider information available at the time each Project-related grading permit request is submitted, including but not limited to: • The availability of in-State emission reduction opportunities, including funding and partnership opportunities with the County, other public agencies, or environmental initiatives with demonstrated integrity; • The geographic attributes of carbon offsets that are listed for purchase and retirement; • The temporal attributes of carbon offsets that are listed for purchase and retirement; • The pricing attributes of carbon offsets that are listed for purchase and retirement; and/or, • Any other information deemed relevant to the evaluation, such as periodicals and reports addressing the availability of carbon offsets. **Seventh,** over the course of the construction period, the Project applicant or its designee shall submit annual reports to PDS that identify the quantity of emission reductions required by this mitigation measure, as well as the carbon offsets retired to achieve compliance with this measure. The annual reports shall identify the locational attributes of the carbon offsets in order to allow PDS to track and monitor the implementation of the geographic priority provision. Such tabulation and tracking shall be to the satisfaction of the Director of the PDS. **M-GHG-2** As to operational greenhouse gas (GHG) emissions, prior to the County of San Diego's (County) issuance of building permits for each implementing Site Plan ("D" Designator), the applicant or its designee shall purchase and retire carbon offsets for the incremental portion of the Proposed Project within the Site Plan in a		Director of the Planning & Development Services Department (PDS) that the Land Exchange Alternative applicant has purchased and retired carbon offsets in a quantity sufficient to offset 100% of the construction GHG emissions and sequestration loss from vegetation removal generated by the Land Exchange Alternative, as associated with each such grading permit. The emissions reduction obligation associated with each grading permit shall be calculated by reference to the certified EIR's Greenhouse Gas Emissions Technical Report (Appendix 2.7-1), which determined total construction-related emissions as equaling **16,728 metric tons of carbon dioxide equivalent (MT CO2e).** This would increase to 16,737 MT CO2e if the Proctor Valley Road North Option is selected. **Fifth**, the purchased carbon offsets used to reduce construction and vegetation removal GHG emissions shall achieve real, permanent, quantifiable, verifiable, and enforceable reductions (Cal. Health and Safety Code Section 38562(d)(1)). **Sixth**, the County of San Diego PDS will consider, to the satisfaction of the Director of PDS, the following geographic priorities for GHG reduction features, and GHG reduction projects and programs: (1) project design features/on-site reduction measures; (2) off-site within the unincorporated areas of the County of San Diego; (3) off-site within the County of San Diego; (4) off-site within the State of California; (5) off-site within the United States; and (6) off-site internationally. As listed, geographic priorities would focus first on local reduction features (including projects and programs that would reduce GHG emissions) to ensure that reduction efforts achieved locally would provide cross-over benefits related to air quality criteria pollutant reductions within the San Diego Air Basin, and to aid in San Diego County jurisdictions' efforts to meet their GHG reduction goals. The Land Exchange Alternative applicant or its designee shall first pursue offset projects and programs locally within unincorporated areas of the County of San Diego to the extent such offset projects and programs are financially competitive in the global offset market. **M-GHG-2** Prior to the County of San Diego's (County) issuance of building permits for each implementing Site Plan ("D" Designator), the applicant or its designee shall purchase and retire carbon offsets for the incremental portion of the Land Exchange Alternative within the Site Plan in a quantity sufficient to offset, for a 30-year period, the operational GHG emissions from that incremental amount of development to net zero, consistent with the performance standards and requirements set forth below.	

TABLE 1

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		quantity sufficient to offset, for a 30-year period, the operational greenhouse gas (GHG) emissions from that incremental amount of development to net zero, consistent with the performance standards and requirements set forth below. **First**, "carbon offset" shall have the same meaning as set forth in M-GHG-1. **Second**, any carbon offset used to reduce the Proposed Project's GHG emissions shall be a carbon offset that represents the past or forecasted reduction or sequestration of one metric ton of carbon dioxide equivalent that is "not otherwise required" (CEQA Guidelines Section 15126.4(c)(3)). **Third**, "the Proposed Project applicant" shall have the same meaning as set forth in M-GHG-1. **Fourth**, as to operational emissions, prior to the County of San Diego's issuance of building permits for each implementing Site Plan ("D" Designator), the Proposed Project applicant or its designee shall provide evidence to the satisfaction of the Director of Planning & Development Services Department (PDS) that it has purchased and retired carbon offsets for the incremental portion of the Proposed Project within the Site Plan in a quantity sufficient to offset, for a 30-year period, the operational GHG emissions from the incremental amount of development to net zero. The "project life" is 30 years. This methodology is consistent with the 30-year project life time frame used by the South Coast Air Quality Management District's GHG guidance (SCAQMD 2008), as well as the methodological parameters used by the California Air Resources Board when reviewing AB 900 projects. (For more information on the evidence supporting the 30-year temporal period, please see Section 8.4.5, Use of Carbon Offsets, and Response to Comment O-5-90.) The emissions reduction obligation associated with each building permit shall be calculated by reference to the certified environmental impact report's (EIR) Greenhouse Gas Emissions Technical Report (Appendix 2.7-1), which determined total operational-related emissions as equaling 16,159 metric tons of carbon dioxide equivalent (MT CO_2e) annually, which equates to **484,770 MT CO_2e** over 30 years. In making such a determination, the Director of the PDS shall require the Project applicant or its designee to provide an attestation or similar documentation from the selected registry(ies) that a sufficient quantity of carbon offsets meeting the standards set forth in this measure have been purchased and retired, thereby demonstrating that the necessary emission reductions are realized. **Fifth**, the purchased carbon offsets used to reduce operational GHG emissions shall achieve real, permanent, quantifiable, verifiable, and enforceable reductions (California Health & Safety Code Section 38562(d)(1)). **Sixth**, the amount of carbon offsets required for each implementing Site Plan shall be based on the GHG emissions with the implementing Site Plan, and shall include operational GHG emissions as identified in the approved Greenhouse Gas Emissions Technical Report. **Seventh**, each implementing Site Plan shall include a tabulation that identifies the overall carbon offsets required to mitigate the entire Proposed Project's GHG		**First**, "carbon offset" shall have the same meaning as set forth in mitigation measure M-GHG-1. **Second**, any carbon offset used to reduce the Land Exchange Alternative's GHG emissions shall be a carbon offset that represents the past reduction or sequestration of 1 metric ton of carbon dioxide equivalent that is "not otherwise required" (CEQA Guidelines Section 15126.4(c)(3)). **Third**, "Land Exchange Alternative applicant" shall have the same meaning as set forth in M-GHG-1. **Fourth**, as to operational emissions, prior to the County's issuance of building permits for each implementing Site Plan ("D" Designator), the Land Exchange Alternative applicant its designee shall provide evidence to the satisfaction of the Director of the County's Planning & Development Services Department that it has purchased and retired carbon offsets for the incremental portion of the Land Exchange Alternative within the Site Plan in a quantity sufficient to offset, for a 30-year period, the operational GHG emissions from the incremental amount of development to net zero. The "project life" is 30 years. This methodology is consistent with the 30-year project life time frame used by the South Coast Air Quality Management District's GHG guidance (SCAQMD 2008). The emissions reduction obligation associated with each building permit shall be calculated by reference to the certified EIR's Greenhouse Gas Emissions Technical Report (Appendix 2.7-1), which determined total construction-related emissions as equaling 20,470 metric tons of carbon dioxide equivalent (MT CO2e) annually, which equates to **614,100 CO2e**. **Fifth**, the purchased carbon offsets used to reduce operational GHG emissions shall achieve real, permanent, quantifiable, verifiable, and enforceable reductions (Cal. Health and Safety Code Section 38562(d)(1)). **Sixth**, the amount of carbon offsets required for each implementing Site Plan shall be based on the GHG emissions with the implementing Site Plan, and shall include operational GHG emissions as identified in the approved Greenhouse Gas Emissions Report. **Seventh**, each implementing Site Plan shall include a tabulation that identifies the overall carbon offsets required to mitigate the entire Land Exchange Alternative's GHG emissions, and shall identify the amount of carbon offsets purchased to date as well as the remaining carbon offsets	

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		emissions (i.e., Table 2.3-13), and shall identify: (1) the amount of carbon offsets purchased to date as a result of prior Site Plan approvals, (2) the amount of carbon offsets required to be purchased and retired for the incremental portion of the Proposed Project within the Site Plan in a quantity sufficient to offset, for a 30-year period, the operational greenhouse gas (GHG) emissions from that incremental amount of development to net zero, and (3) the remaining carbon offsets required to reduce the Proposed Project's remaining emissions to net zero. The Project applicant or its designee shall submit annual reports to PDS that identify the quantity of emission reductions required by this mitigation measure, as well as the carbon offsets retired to achieve compliance with this measure. The annual reports shall identify the locational attributes of the carbon offsets in order to allow PDS to track and monitor the implementation of the geographic priority provision. Such tabulation and tracking shall be to the satisfaction of the Director of PDS. For clarity, the following example is provided to illustrate the Proposed Project's operational GHG emissions purchase and retirement strategy. If 100 single-family residential units are proposed to be developed in conjunction with an implementing Site Plan ("D" Designator), GHG emissions for those land uses would be calculated and carbon offsets for those emissions would be secured for a 30-year period. To facilitate implementation of this strategy, the Proposed Project's total emissions have been allocated on a per dwelling unit basis; this methodological approach ensures that, when each dwelling unit is developed, the emissions from the Proposed Project's resident-serving non-residential facilities will also be offset. Thus, the 100-single family-residential units contemplated by this example would be multiplied by 15.81 MT CO_2e/dwelling unit (total project emissions / total # of dwelling units = 16,159 MT CO_2e /yr / 1,022 dwelling units = 15.81 MT CO_2e /yr/DU). This value would then be multiplied by 30, to calculate the total carbon offsets required for that phase of development (e.g., 100 single-family residential units × 15.81 MT CO_2e /du × 30 = 47,430 MT CO_2e of carbon offsets). **Eighth**, this EIR acknowledges that the Proposed Project's GHG emissions estimates are conservative because the Proposed Project's GHG emissions are expected to decrease beyond the estimates presented in the EIR's analysis, in part, due to reasonably foreseeable improvements in fuel efficiency, vehicle fleet turnover, technological improvements related to transportation and energy, and updates to emissions models and methodologies. Thus, subject to County oversight, and the processes described below, the operational emission estimates that govern implementation of this Proposed Project are subject to a "true up" at the election of the Proposed Project applicant (as defined above) or its designee and subject to the satisfaction of the County's Board of Supervisors, as considered pursuant to a noticed public hearing process that accords with applicable legal requirements, including those set forth in CEQA for the post-approval modification of mitigation implementation parameters. Specifically, if the Project applicant elects to process ~~and a~~ "true-up" exercise subsequent to the County's certification of the Final EIR and approval of the Proposed Project, the Proposed Project applicant shall provide an operational GHG emissions inventory of the Proposed Project's operational emissions for the "true up" operational conditions, including emissions from mobile sources, energy, area sources, water consumption, and solid waste. Subject to the satisfaction of the Board of Supervisors, these calculations shall be conducted using a County-approved model and/or		required to reduce the Land Exchange Alternative's emissions to net zero. Such tabulation and tracking shall be to the satisfaction of the Director of PDS. **Eighth**, this EIR acknowledges that the Land Exchange Alternative's GHG emissions estimates are conservative because the Land Exchange Alternative's GHG emissions are expected to decrease beyond the estimates presented in the EIR's analysis, in part, due to reasonably foreseeable improvements in fuel efficiency, vehicle fleet turnover, technological improvements related to transportation and energy, and updates to emissions models and methodologies. Thus, subject to County oversight, the operational emission estimates that govern implementation of this Land Exchange Alternative are subject to a "true up" at the election of the Land Exchange Alternative applicant (as defined above) and subject to the satisfaction of the Director of PDS. Specifically, if new technological-advancements, regulatory updates, or model and methodology updates occur at a future date result in greater GHG efficiencies and less impacts from Land Exchange Alternative operations than the information projected in the certified Final EIR for the Land Exchange Alternative and a "true-up" exercise is undertaken, the Land Exchange Alternative applicant shall provide an operational GHG emissions inventory of the Land Exchange Alternative's operational emissions for the "true up" operational conditions, including emissions from mobile sources, energy, area sources, water consumption, and solid waste. If updated GHG emission calculations are conducted for the "true-up" exercise at the Land Exchange Alternative applicant's election, subject to the satisfaction of the Director of PDS, these calculations shall be conducted using a County-approved model and/or methodology. Alternatively, the Land Exchange Alternative applicant may purchase all carbon offset credits to reduce operational GHG emissions at issuance of the first building permit. The "true up" operational GHG emissions inventory, if conducted, will be provided in the form of a project-specific Updated Emissions Inventory and Offset Report to the County's Director of PDS (or its designee) prior to the issuance of building permits for the next buildout phase. The subject technical documentation shall be prepared by a County-approved, qualified air quality and greenhouse gas technical specialist. If the Director of PDS (or its designee) determines that the technical documentation demonstrates that the quantity of project-related GHG emissions would be lower than the quantity identified in the certified Final EIR for the Land Exchange Alternative, and finds that the technical documentation is supported by substantial evidence, such Planning Director may authorize a reduction in the total carbon offsets value required for the Land Exchange Alternative. In all	

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		methodology and must validate the continuing adequacy of modeling inputs used in the EIR that are not proposed to be altered as part of the "true-up" exercise. The inclusion of the validation requirement ensures that any updated operational GHG emissions inventories for the Project fully account for then-existing information that is relevant to the emissions modeling. Alternatively, the Proposed Project applicant may purchase all carbon offset credits to reduce operational GHG emissions at issuance of the first building permit. The "true up" operational GHG emissions inventory, if conducted, will be provided in the form of a project-specific Updated Emissions Inventory and Offset Report to the County's Board of Supervisors (or its designee) prior to the issuance of building permits for the next build-out phase. The subject technical documentation shall be prepared by a County-approved, qualified air quality and greenhouse gas technical specialist. In all instances, substantial evidence must confirm that any reduction to the total carbon offsets value as identified in the certified Final EIR for the Proposed Project is consistent with the Proposed Project commitment to achieve and maintain carbon neutrality (i.e., net zero emissions) for the 30-year life of the Proposed Project. **Ninth**, all carbon offsets required to reduce the Project's operational emissions shall be associated with reduction activities that are geographically prioritized according to the following locational attributes: (1) off-site, unincorporated areas of the County of San Diego; (2) off-site, incorporated areas within the County of San Diego; (3) off-site areas within California; (4) off-site areas within the United States; and (5) off-site international areas. As listed, geographic priorities would focus first on local reduction options (including projects and programs that would reduce GHG emissions) to ensure that reduction efforts achieved locally would provide cross-over, co-benefits related to other environmental resource areas. The Director of the PDS shall issue a written determination that offsets are unavailable and/or fail to meet the feasibility factors defined in CEQA Guidelines Section 15364 in a higher priority geographic category before allowing offsets from the next lower priority category. In making such a determination, the Director of the PDS shall consider information available at the time each Project-related building permit request is submitted, including but not limited to: • The availability of in-State emission reduction opportunities, including funding and partnership opportunities with the County, other public agencies, or environmental initiatives with demonstrated integrity; • The geographic attributes of carbon offsets that are listed for purchase and retirement; • The temporal attributes of carbon offsets that are listed for purchase and retirement; • The pricing attributes of carbon offsets that are listed for purchase and retirement; and/or, • Any other information deemed relevant to the evaluation, such as periodicals and reports addressing the availability of carbon offsets. **M-GHG-3** Prior to the issuance of residential building permits, the applicant or its designee shall provide evidence to the County of San Diego that the design plans for residential structures include electrical outlets in the front and rear of the structure to facilitate use of electrical lawn and garden equipment.		instances, substantial evidence must confirm that any reduction to the total carbon offsets value as identified in the certified Final EIR for the Land Exchange Alternative is consistent with the Land Exchange Alternative commitment to achieve and maintain carbon neutrality (i.e., net zero emissions) for the 30-year life of the Land Exchange Alternative. **Ninth**, the County of San Diego PDS will consider, to the satisfaction of the Director of PDS, the following geographic priorities for GHG reduction features, and GHG reduction projects and programs: (1) project design features/on-site reduction measures; (2) off-site within the unincorporated areas of the County of San Diego; (3) off-site within the County of San Diego; (4) off-site within the State of California; (5) off-site within the United States; and (6) off-site internationally. As listed, geographic priorities would focus first on local reduction features (including projects and programs that would reduce GHG emissions) to ensure that reduction efforts achieved locally would provide cross-over benefits related to air quality criteria pollutant reductions within the San Diego Air Basin, and to aid in San Diego County jurisdictions' efforts to meet their GHG reduction goals. The Land Exchange Alternative applicant or its designee shall first pursue offset projects and programs locally within unincorporated areas of the County of San Diego to the extent such offset projects and programs are financially competitive in the global offset market. **M-GHG-3** Prior to the issuance of residential building permits, the applicant shall provide evidence to the County of San Diego that the design plans for residential structures include electrical outlets in the front and rear of the structure to facilitate use of electrical lawn and garden equipment. **M-GHG-4** To reduce greenhouse gas (GHG) emissions, the applicant shall provide evidence to the County of San Diego that the following project design features (PDFs) identified for the Land Exchange Alternative herein will be implemented: PDF-AQ/GHG-1, PDF-AQ/GHG-2, PDF-AQ/GHG-3, PDF-AQ/GHG-4, PDF-AQ/GHG-5, PDF-AQ/GHG-6, PDF-TR-1, PDF-UT-1, PDF-UT-2, PDF-UT-3, and PDF-UT-4.	

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		M-GHG-4 To reduce greenhouse gas emissions, the applicant or its designee shall provide evidence to the County of San Diego that the following project design features identified for the Proposed Project in Table 2.7-5 and Table 1 of the Mitigation Monitoring and Reporting Program (MMRP), will be implemented: PDF-AQ/GHG-1 (Wood-Burning Stoves and Fireplaces), PDF-AQ/GHG-2 (Zero Net Energy Residences), PDF-AQ/GHG-3 (Non-Residential Energy Improvement Standards), PDF-AQ/GHG-4 (Energy Star Appliances), PDF-AQ/GHG-5 (Solar Water Heating), PDF-AQ/GHG-6 (Efficient Outdoor Lighting), PDF-AQ/GHG-7 (New Resident Information Packet), PDF-AQ/GHG-8 (Cool Roofs), PDF-AQ/GHG-9 (Cool Pavement), PDF-AQ/GHG-10 (Electric Vehicle Charging Stations), PDF-TR-1 (TDM Program), PDF-UT-1 (Hot Water Pipe Insulation – Residential and Non-Residential), PDF-UT-2 (Pressure Reducing Valves – Residential and Non-Residential), PDF-UT-3 (Water Efficient Dishwashers), PDF-UT-4 (Residential Landscaping), and PDF-UT-5 (Water Conservation).			
			Conflict with Applicable Plan, Policy, or Regulation		
GHG-2	The Proposed Project would generate GHG emissions that may interfere with the implementation of GHG reduction goals for 2030 and 2050.	**M-GHG-1** (described above) **M-GHG-2** (described above) **M-GHG-3** (described above) **M-GHG-4** (described above)	Impacts would be less than significant	**M-GHG-1** (described above) **M-GHG-2** (described above) **M-GHG-3** (described above) **M-GHG-4** (described above)	**M-GHG-1** **M-GHG-2** **M-GHG-3** **M-GHG-4**
			2.8 Noise		
			On-Site Traffic Noise		
N-1	The traffic noise modeling results indicate that Future Plus Project traffic noise levels would exceed the County of San Diego's exterior noise standard of 60 dBA CNEL along some of the outdoor residential living areas located near Proctor Valley Road.	**M-N-1** The single-family residential lots shown in Figure 2.8-4 with rear- or side-yard exposures adjacent to Proctor Valley Road shall include minimum 6-foot-high solid noise barriers along the exposure. The noise barriers may be constructed as a wall or berm, or a combination of both. The materials used in construction of the barrier shall have a minimum surface density of 4 pounds per square foot. They may consist of masonry material, 0.625-inch-thick Plexiglas, 0.25-inch-thick plate glass, or a combination of these materials. The barriers must be designed so there are no openings or cracks.	Impacts would be less than significant.	Existing and future Proctor Valley Road vehicle noise levels at all identified outdoor living areas of the Land Exchange Alternative residential units would comply with the County's 60 CNEL exterior noise criterion, provided that the Land Exchange Alternative Mitigation Measure M-N-1 (construction of 6-foot-high, solid walls at single-family residential units adjacent to Proctor Valley Road (see Figure 7 for locations) is implemented. Thus, vehicle noise impacts to on-site residences would be less than significant.	**M-N-1** Existing and future Proctor Valley Road vehicle noise levels at outdoor living areas of the Proposed Project Amendment residential units would comply with the County's 60 CNEL exterior noise criterion, provided that the Mitigation Measure M-N-1 (construction of 6-foot-high, solid walls at single-family residential units adjacent to Proctor Valley Road is implemented. Thus, vehicle noise impacts to on-site residences would be less than significant.
N-2	The Proposed Project's second-floor exterior noise levels would range from 55 to 69 dBA CNEL at proposed residential lots, which implies that interior noise levels at second-floor elevations would range from approximately 40 to 54 dBA CNEL. Therefore, the interior noise level for habitable spaces potentially would exceed the County of San Diego's 45 dBA CNEL interior noise criterion.	**M-N-2** Prior to issuance of building permits (and after preparation of detailed building plans) for proposed single-family residential units directly adjacent to Proctor Valley Road, as shown in Figure 2.8-4, the building permit applicant or its designee shall demonstrate that interior noise levels will not exceed the applicable County of San Diego noise ordinance standard of 45 dBA CNEL for the subject land use. In addition to the installation of sound walls that shall be constructed under mitigation measure M-N-1, it is anticipated that compliance with the applicable standard shall be achieved by structure setbacks, acoustically rated windows and doors, and/or air conditioning or equivalent forced air circulation to allow occupancy with closed windows, which, for most construction, would provide sufficient exterior-to-interior noise reduction. A supplemental acoustical study shall be prepared to demonstrate and verify that interior noise levels will be below 45 dBA CNEL within habitable residential rooms. **Implementation:** Applicant or its designee, and primary contractor(s) of all Proposed Project phases for the single-family residential units directly adjacent to Proctor Valley Road. **Timing:** A Noise Restriction Easement shall be dedicated to the Final Map, required prior to issuance of building permits for development of on-site single-family	Impacts would be less than significant.	The noise levels at the second-floor level of proposed residences directly adjacent to Proctor Valley Road could potentially exceed 60 dB CNEL. Thus, without mitigation, the interior noise levels could exceed the County's 45 dB CNEL interior noise criterion. Prior to issuance of building permits, an interior noise study would be required for the residences directly adjacent to Proctor Valley Road to ensure that the interior CNEL would not exceed 45 dB (mitigation measure M-N-2). The residences would most likely require air-conditioning and/or mechanical ventilation systems to meet the County's interior noise standard. Sound-rated windows may also be required. Thus, impacts would be considered less than significant with mitigation incorporated.	**M-N-2** Prior to issuance of building permits, an interior noise study would be required for the residences directly adjacent to Proctor Valley Road to ensure that the interior CNEL would not exceed 45 dB (mitigation measure M-N-2). The residences would most likely require air-conditioning and/or mechanical ventilation systems to meet the County's interior noise standard. Sound-rated windows may also be required. Thus, impacts would be considered less than significant with mitigation incorporated.

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		residential units directly adjacent to Proctor Valley Road, and after detailed building plans are available and model numbers/types have been sited on a precise grading plan. **Enforcement:** County of San Diego			
Operational Impacts (Non-Construction Noise)					
N-4	Noise levels attributed to unshielded HVAC mechanical systems could exceed the County of San Diego's daytime property line noise limit for occupied noise-sensitive land uses (NSLUs) (50 dBA L_{eq}) within 250 feet of the source. In addition, sources within 450 feet of an occupied NSLU property line could exceed the County's nighttime noise limit (45 dBA L_{eq}) for stationary-source noise.	**M-N-3** Prior to the issuance of any building permit for stationary noise-generating equipment such as heating, ventilation, and air conditioning (HVAC) systems, the Proposed Project applicant or its designee shall prepare a supplemental acoustical study of the proposed stationary noise sources associated with the HVAC systems for submittal to the County of San Diego (County) for review and approval. Best engineering practices shall be implemented, and the placement of noise-generating equipment and shielding shall be considered when installing stationary noise sources associated with HVAC systems. The acoustical study shall identify noise-generating equipment and predict noise levels from identified equipment at the applicable property lines. Where predicted noise levels would exceed those levels deemed acceptable as established by the County's Noise Ordinance, Section 36.404, the acoustical study shall identify mitigation measures shown to effectively reduce noise levels (e.g., enclosures, barriers, site orientation) to comply with Section 36.404. Such mitigation measures shall be implemented by the applicant or its designee prior to issuance of any building permits. **Implementation:** Applicant or its designee, and primary contractor(s) of all Proposed Project phases. **Timing:** Prior to issuance of building permits **Enforcement:** County of San Diego	Impacts would be less than significant.	The Land Exchange Alternative's operational noise sources would include air-conditioning units at each of the single-family and multifamily homes. Noise from HVAC equipment at the Land Exchange Alternative is considered a potentially significant impact. Mitigation measure M-N-3 is provided to reduce potential impacts to less than significant.	**M-N-3** Operational noise sources would include air-conditioning units at each of the single-family and multifamily homes. Noise from HVAC equipment is considered a potentially significant impact. Mitigation measure M-N-3 is provided to reduce potential impacts to less than significant.
Construction Noise					
N-5	Construction activities associated with Proctor Valley Road improvements could result in exceedances of the County of San Diego's 75 dBA $L_{eq(8\text{-}hr)}$ noise standard at the nearest existing noise-sensitive land uses in Jamul (County of San Diego).	**M-N-4** The Proposed Project applicant or its designee shall take those steps necessary to ensure that construction equipment is properly maintained and equipped with noise-reduction intake, exhaust mufflers, and engine shrouds in accordance with manufacturer recommendations. Equipment engine shrouds shall be closed during equipment operation. **M-N-5** The Proposed Project applicant or its designee shall take those steps necessary to ensure that, whenever feasible, electrical power shall be used to run air compressors and similar power tools. **M-N-6** The Proposed Project applicant or its designee shall take those steps necessary to ensure that equipment staging areas are located as far as feasible from occupied residences and schools. **M-N-7** The Proposed Project applicant or its designee shall take those steps necessary to ensure that for construction activities on and off the Project Area, noise attenuation techniques are employed to ensure that noise levels remain below 75 dBA L_{eq} at existing noise-sensitive land uses. Such techniques shall include use of sound blankets on noise-generating equipment and construction of temporary sound barriers adjacent to construction sites near affected uses to achieve noise levels below 75 dBA L_{eq}. **Implementation:** Applicant, or its designee, and primary contractor(s) of all Proposed Project phases involving construction **Timing:** Prior to and during Proposed Project construction **Enforcement:** County of San Diego	Impacts would be less than significant.	Construction noise associated with improvements of Proctor Valley Road, as well as on-site construction noise at adjacent, occupied residences are considered potentially significant impacts. Mitigation measures M-N-4 through M-N-7 are provided to reduce potential impacts to less than significant.	**M-N-4** **M-N-5** **M-N-6** **M-N-7** Construction noise associated with improvements of Proctor Valley Road, as well as on-site construction noise at adjacent, occupied residences are considered potentially significant impacts. Mitigation measures M-N-4 through M-N-7 are provided to reduce potential impacts to less than significant.
N-6	Construction activities associated with Proctor Valley Road improvements would exceed ambient existing noise levels at	**M-N-4** (described above) **M-N-5** (described above) **M-N-6** (described above)	Impacts would be less than significant.	Mitigation measures M-N-4 through M-N-7 are provided to reduce potential impacts to less than significant.	Mitigation measures **M-N-4** through **M-N-7** are provided to reduce potential impacts to less than significant.

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	the nearest existing noise-sensitive land uses in the City of Chula Vista.	**M-N-7** (described above)			
N-7	Construction activities associated with Proctor Valley Road in Village 14 could result in exceedances of the County of San Diego's 75 dBA $L_{eq(8\text{-}hr)}$ noise standard at adjacent on-site residences.	**M-N-4** (described above) **M-N-5** (described above) **M-N-6** (described above) **M-N-7** (described above)	Impacts would be less than significant.	Mitigation measures M-N-4 through M-N-7 are provided to reduce potential impacts to less than significant.	Mitigation measures **M-N-4** through **M-N-7** are provided to reduce potential impacts to less than significant.
N-8	Construction activities associated with Proctor Valley Road in Planning Areas 16/19 could result in exceedances of the County of San Diego's 75 dBA $L_{eq(8\text{-}hr)}$ noise standard for adjacent existing residences.	**M-N-4** (described above) **M-N-5** (described above) **M-N-6** (described above) **M-N-7** (described above)	Impacts would be less than significant	Mitigation measures M-N-4 through M-N-7 are provided to reduce potential impacts to less than significant.	Mitigation measures **M-N-4** through **M-N-7** are provided to reduce potential impacts to less than significant.
N-9	Based on a preliminary estimate of the nearest potential areas where rock blasting may be necessary within approximately 140 feet of existing residences, a maximum noise level of up to 89 dBA L_{max} from the rock drilling and up to 85 dBA L_{max} from the blasting could occur. These levels would exceed County of San Diego's threshold of significance for impulsive sounds at residential land uses of 82 dBA L_{max}.	**M-N-4** (described above) **M-N-5** (described above) **M-N-6** (described above) **M-N-7** (described above)	Impacts would be less than significant	Mitigation measures M-N-4 through M-N-7 are provided to reduce potential impacts to less than significant.	Mitigation measures **M-N-4** through **M-N-7** are provided to reduce potential impacts to less than significant.
N-10	The closest existing off-site residence property line (Planning Areas 16/19) or noise-sensitive land use could be located within approximately 140 feet of the proposed rock crushing. At this distance, the noise level (both 8-hour average and impulsive noise) associated with the rock-crushing activities would be approximately 77 dBA L_{eq} and approximately 85 dBA L_{max}. These noise levels would exceed County of San Diego's 8-hour construction noise and impulsive noise thresholds.	**M-N-9** Prior to approval of the grading permit for any portion of the Proposed Project, the Proposed Project applicant or its designee shall take those steps necessary to ensure that on-site rock-crushing facilities are located a minimum of 250 feet from the property line of occupied residences or other noise-sensitive uses. **Implementation**: Applicant or its designee, and primary contractor(s) of all Proposed Project phases involving rock crushing. **Timing**: Prior to and during Proposed Project related rock-crushing activities. **Enforcement**: County of San Diego	Impacts would be less than significant	**M-N-9** Prior to approval of the grading permit for any portion of the Proposed Project, the Proposed Project applicant or its designee shall take those steps necessary to ensure that on-site rock-crushing facilities are located a minimum of 250 feet from the property line of occupied residences or other noise-sensitive uses. **Implementation**: Applicant or its designee, and primary contractor(s) of all Proposed Project phases involving rock crushing. **Timing**: Prior to and during Proposed Project related rock-crushing activities. **Enforcement**: County of San Diego	**M-N-9** Mitigation measure **M-N-9** is provided to reduce potential impacts to less than significant.
			Groundborne Vibrations		
N-11	The nearest sensitive receptors to Proposed Project construction activities that could produce high vibration levels would be at residences to the north and west of off-site Proctor Valley Road improvements in Jamul and the City of Chula Vista, located approximately 60 feet and 140 feet away. At a distance of 60 feet and greater, vibration levels from grading activities are anticipated to exceed 0.004 inches per second root mean square or 0.1 inches per second	**M-N-10** Prior to beginning construction of any Proposed Project component within 300 feet of an existing or future occupied residence, the Proposed Project applicant or its designee shall require preparation of a Vibration Monitoring Plan (VMP) for submittal to the County of San Diego (County) noise control officer for review and approval. At a minimum, the VMP shall require data to be sent to the County noise control officer or designee on a weekly basis or more frequently as determined by the noise control officer. The data shall include vibration-level measurements taken during the previous work period. In the event that the County noise control officer determines there is reasonable probability that future measured vibration levels would exceed allowable limits, the County noise control officer or designee shall take the necessary steps to ensure that future vibration levels do not exceed such limits, including suspending further construction activities that could result in excessive vibration levels, until either alternative	Impacts would be less than significant	The nearest sensitive receptors to Land Exchange Area's construction activities that could produce high vibration levels would be at the same residences to the north and west of off-site Proctor Valley Road improvements in Jamul and Chula Vista, identified as part of the construction noise impact assessment (see Section 8.2.1), located approximately 200 feet and 220 feet away, respectively. Therefore, at a distance of 200 feet and greater, vibration levels from grading activities are not anticipated to exceed 0.004 inches per second RMS or 0.1 inches per second PPV at the nearest off-site residences. This impact would be less than significant.	**M-N-10** Mitigation measure **M-N-10** would be provided to reduce potential impacts to less than significant levels.

TABLE 1

Approved Adara Project				Land Exchange Alternative	Proposed Project Amendment
Impact No.	**Impact**	**Mitigation**	**Conclusion**	**Impact(s) and Mitigation from Technical Reports**	**Impacts and Mitigation from Addendum and Technical Memoranda**
	peak particle velocity at the nearest off-site residences.	equipment or alternative construction procedures can be used that generate vibration levels that do not exceed 0.004 inches per second root mean square (RMS) or 0.1 inches per second peak particle velocity (PPV) at the nearest residential structure. Construction activities not associated with vibration generation could continue. The VMP shall be prepared and administered by a County-approved noise consultant. In addition to the data described previously, the VMP shall include the location of vibration monitors, the vibration instrumentation used, a data acquisition and retention plan, and exceedance notification and reporting procedures. A description of these plan components is as follows: **Location of Vibration Monitors:** The VMP shall indicate monitoring locations, including the location of measurements to be taken at construction site boundaries and at nearby residential properties. **Vibration Instrumentation:** Vibration instrumentation shall be capable of measuring maximum unweighted RMS and PPV levels triaxially (in three directions) over a frequency range of 1 to 100 Hertz. The vibration instrumentation shall be set to automatically record daily events during working hours, and to record peak triaxial PPV values in 5-minute-interval histogram plots. The method of coupling the geophones to the ground shall be described and included in the VMP. The vibration instrumentation shall be calibrated within 1 year prior to the measurement, and a certified laboratory conformance report shall be included in the VMP. **Data Acquisition:** The information to be provided in the data reports shall include, at a minimum, daily histogram plots of PPV versus time of day for three triaxial directions, and maximum peak vector sum PPV and maximum frequency for each direction. The reports shall also identify the construction equipment in operation during the monitoring period, and their locations and distances to vibration measurement locations. **Exceedance Notification and Reporting Procedures:** The VMP shall include a description of the notification of exceedance and reporting procedures, and the followIng W-up procedures taken to reduce vibration levels to below the allowable limits. **Implementation:** Applicant or its designee, and primary contractor(s) of all Proposed Project phases involving the use of heavy construction equipment within 300 feet of existing or future occupied residences. **Timing:** Prior to and during construction activities **Enforcement:** County of San Diego			
N-12	The occupied Proposed Project phases have the potential to be impacted by vibration from ongoing construction activities. Location-specific phasing schedules are not available at this time; it is, therefore, possible that construction of a new phase of the Proposed Project could take place as near as 50 feet from an occupied phase. In such an instance, short-term vibration levels as high as 0.03 inches per second root mean square (RMS) could result. Therefore, vibration levels from grading activities may exceed 0.004 inches per second RMS at the nearest on-site residence.	**M-N-10** (described above)	Impacts would be less than significant	Because the development of the Land Exchange Alternative would be a multiyear endeavor, portions of the development would be completed and occupied during the construction of subsequent portions (phases). Therefore, the occupied Land Exchange Alternative phases have the potential to be impacted by vibration from on-going construction activities. Location-specific phasing schedules are not available at this time; it is therefore possible that construction of a new phase of the Land Exchange Alternative could take place as near as 50 feet of an occupied phase. In such an instance, short-term vibration levels as high as 0.03 inches per second RMS could result. Therefore, vibration levels may exceed 0.004 inches per second RMS from grading activities on and off site at the nearest on-site residence. This impact would be potentially significant. Mitigation measures are discussed in Section 11.	**M-N-10** Mitigation measure **M-N-10** would be provided to reduce potential impacts to less than significant levels.

TABLE 1

Approved Adara Project				Land Exchange Alternative	Proposed Project Amendment
Impact No.	**Impact**	**Mitigation**	**Conclusion**	**Impact(s) and Mitigation from Technical Reports**	**Impacts and Mitigation from Addendum and Technical Memoranda**
N-13	Because the exact blasting locations, necessary geotechnical data, and blasting and materials handling plans are not known at this time, it is not possible to conduct a noise analysis assessing the proposed blasting and materials handling associated with the Proposed Project. Therefore, for purposes of this analysis, impacts are considered potentially significant.	**M-N-8** Prior to approval of the grading permit issued for any portion of the Project Area, the Proposed Project applicant or its designee shall direct that the designated contractor prepare a blasting and monitoring plan with an estimate of noise and vibration levels of each blast at noise-sensitive land uses within 1,000 feet of each blast. Where potential exceedance of either the County of San Diego's (County) Noise Ordinance or the City of Chula Vista's Noise Control Ordinance is identified, the blast drilling and monitoring plan shall identify mitigation measures shown to effectively reduce noise and vibration levels (e.g., altering orientation of blast progression, increased delay between charge detonations, presplitting) to be implemented to comply with the noise level limits of the County's Noise Ordinance, Sections 36.409 and 36.410; the Chula Vista Noise Control Ordinance, Chapter 19.68; and the vibration-level limits of 1 inch per second peak particle velocity. Such measures shall be implemented by the Proposed Project applicant or its designee prior to the issuance of the grading permit. Additionally, Proposed Project phases involving blasting shall conform to the following requirements: • Blasting activities shall be performed by a blast contractor and blasting personnel licensed to operate in the County. • Each blast shall be monitored and recorded with an air-blast overpressure monitor and groundborne vibration accelerometer that is located outside the closest residence to the blast and is approved by the County. Blasting shall not exceed 0.1 inch per second peak particle velocity at the nearest occupied residence, in accordance with County of San Diego's Noise Guidelines, Section 4.3. **Implementation:** Applicant or its designee, and primary contractor(s) of all Proposed Project phases involving blasting **Timing:** Prior to and during Proposed-Project-related blasting activities **Enforcement:** County of San Diego	Impacts would be less than significant	Noise from blasting activities associated with the excavation and mass-grading phase of the Land Exchange Alternative is considered potentially significant, and mitigation measure M-N-8 is provided to reduce potential impacts to less than significant.	**M-N-8** Mitigation measure **M-N-8** would be provided to reduce potential impacts to less than significant levels.
Cumulative Impact					
N-CUM-1	The Proposed Project's contribution to increases in noise levels at off-site noise-sensitive land uses could be cumulatively considerable due to construction noise.	**M-N-4** (described above) **M-N-5** (described above) **M-N-6** (described above) **M-N-7** (described above)	Impacts would be less than significant	Mitigation measures **M-N-4** through **M-N-7** are provided to reduce potential impacts to less than significant.	Mitigation measures **M-N-4** through **M-N-7** are provided to reduce potential impacts to less than significant.
2.10 Paleontological Resources					
PR-1	Excavation in areas underlain by the Otay Formation would result in potentially significant impacts to paleontological resources.	**M-PR-1:** A Qualified Paleontologist shall supervise a Paleontological Monitoring Program. A Qualified Paleontologist is a person who has, to the satisfaction of the County of San Diego Director of Planning & Development Services: • a Ph.D. or M.S. or equivalent in paleontology or closely related field (e.g., sedimentary or stratigraphic geology, evolutionary biology); • demonstrated knowledge of Southern California paleontology and geology; and • documented experience in professional paleontological procedures and techniques. The Qualified Paleontologist shall conduct or supervise the following mitigation tasks: • Monitoring of excavation operations to discover unearthed fossil remains, generally involving monitoring of ongoing excavation activities (e.g., sheet grading pads, cutting slopes and roadways, basement and foundation excavations, and trenching). A Paleontological Resources Monitor must have at least 1 year of experience in field identification and collection of fossil materials.	Impacts would be less than significant	Impacts would be reduced compared to the Approved Project because the Development Footprint would be reduced; however, the same mitigation measure would apply and would reduce impacts to less than significant, similar to the Approved Project.	**M-PR-1:** Impacts would be reduced compared to the Approved Project because the Development Footprint would be reduced; however, the same mitigation measure would apply and would reduce impacts to less than significant, similar to the Approved Project.

TABLE 1

Approved Adara Project				Land Exchange Alternative	Proposed Project Amendment
Impact No.	**Impact**	**Mitigation**	**Conclusion**	**Impact(s) and Mitigation from Technical Reports**	**Impacts and Mitigation from Addendum and Technical Memoranda**
		• Salvaging of unearthed fossil remains, typically involving simple excavation of the exposed specimens, but possibly also plaster-jacketing of individual large and/or fragile specimens, or more elaborate quarry excavation of richly fossilferous deposits. • Recording of stratigraphic, geologic, and geographic data to provide a context for the recovered fossil remains, including accurate plotting (mapping) on grading plans and standard topographic maps of all fossil localities, description of lithologies of fossil-bearing strata, measurement and description of the overall stratigraphic section (unless considered by the Project Paleontologist to be infeasible), and photographic documentation of the geologic setting. • Laboratory preparation (cleaning and repair) of collected fossil remains to the point of identification (not exhibition), generally involving removal of enclosing sedimentary rock material, stabilization of fragile specimens (using glues and other hardeners), and repair of broken specimens. • Curating prepared fossil remains, typically involving scientific identification and cataloguing of specimens, and entry of data into one or more accredited institutional (museum or university) collection (specimen/species lot and/or locality) databases. Curation is necessary so that the specimens are available for scientific research. • Transferal, for archival storage, of cataloged fossil remains and copies of relevant field notes, maps, stratigraphic sections, and photographs to an accredited institution (museum or university) in California that maintains paleontological collections, preferably one of the following: o San Diego Natural History Museum o Los Angeles County Museum o San Bernardino Museum of Natural History o University of California Museum of Paleontology, Berkeley o Anza-Borrego Desert State Park (if the fossils were salvaged in the desert) • Preparation of a final report summarizing the results of the field investigation, laboratory methods, stratigraphic information, types and importance of collected fossils, and any necessary graphics to document the stratigraphy and precise fossil collecting localities.			
2.11 Tribal Cultural Resources					
TCR-1	Implementation of the Preserve Trails Option would result in a potentially significant indirect impact to a possible tribal cultural resource.	**M-TCR-1 Data Recovery** - To mitigate potential indirect impacts to the eastern portion of site CA-SDI-12373, a phased data recovery program shall be implemented by a County of San Diego (County) approved archaeologist prior to granting any easement for trail uses. The phased data recovery (prepared as a separate document) shall involve implementation of surface collection and curation/repatriation of artifacts to prevent looting. All archaeological materials recovered during the data recovery efforts shall be cleaned, sorted, cataloged, and analyzed following standard archaeological procedures, and shall be documented in a data recovery report. Upon completion of fieldwork, the County-approved archaeologist shall submit a letter report summarizing the field work efforts and stating that the scientifically significant sample of the site has been recovered. Upon approval from the County archaeologist, the trail easement may be granted.	Impacts would be less than significant	Due to the absence of TCRs in the ADI or APE, there are no impacts to TCRs and therefore no mitigation is required concerning TCRs. Should a TCR be identified during tribal consultation, then this report will be revised to address potential impacts and mitigation of such impacts.	N/A - Due to the absence of TCRs in the ADI or APE, there are no impacts to TCRs and therefore no mitigation is required concerning TCRs. Should a TCR be identified during tribal consultation, then this report will be revised to address potential impacts and mitigation of such impacts.

ATTACHMENT 2 – CALEEMOD OUTPUT FILES (.PDF) FOR SRP UNITS

Proposed Project Amendment Operational Res

San Diego County, Annual

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Condo/Townhouse High Rise	150.00	Dwelling Unit	2.34	150,000.00	429
Single Family Housing	1,103.00	Dwelling Unit	358.12	1,985,400.00	3155
User Defined Residential	13.00	Dwelling Unit	38.00	61,477.00	37

1.2 Other Project Characteristics

Urbanization	Rural	**Wind Speed (m/s)**	2.6	**Precipitation Freq (Days)**	40
Climate Zone	13			**Operational Year**	2028
Utility Company	San Diego Gas & Electric				
CO2 Intensity (lb/MWhr)	441.1	**CH4 Intensity (lb/MWhr)**	0.029	**N2O Intensity (lb/MWhr)**	0.006

1.3 User Entered Comments & Non-Default Data

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Project Characteristics - RPS
Operational emissions only.
Residential emissions only.

Land Use - Data provided by applicant.
Res only for comparison.

Construction Phase - Operational only.

Off-road Equipment - Operational only.

Trips and VMT - Operational only.

Vehicle Trips - Trip lengths from LEA. Trip rates adjusted from traffic report.

Woodstoves - Single family and estate home natural gas fire place use included in building natural gas consumption.

Area Coating - SDAPCD Rule 67.0.1

Energy Use - Consol report, nonresidential assume 10% beyond 2016 Title 24

Water And Wastewater - LEA water conservation plan

Solid Waste - Assume solid waste rate 3.6 tons per day.

Sequestration -

Energy Mitigation -

Table Name	Column Name	Default Value	New Value
tblAreaCoating	Area_EF_Nonresidential_Exterior	250	150
tblAreaCoating	Area_EF_Nonresidential_Interior	250	150
tblAreaCoating	Area_EF_Residential_Exterior	250	150
tblAreaCoating	Area_EF_Residential_Interior	250	150
tblEnergyUse	LightingElect	1,001.10	2.23
tblEnergyUse	LightingElect	0.35	0.75
tblEnergyUse	LightingElect	1,608.84	764.00
tblEnergyUse	LightingElect	0.00	0.21
tblEnergyUse	NT24E	3,054.10	1.01
tblEnergyUse	NT24E	6,155.97	3,936.00
tblEnergyUse	NT24E	0.00	0.73

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tblEnergyUse	NT24NG	4,180.00	0.00
tblEnergyUse	NT24NG	4,180.00	5,200.00
tblEnergyUse	NT24NG	0.00	0.95
tblEnergyUse	T24E	1.21	1.09
tblEnergyUse	T24E	209.39	1.37
tblEnergyUse	T24E	1.52	1.37
tblEnergyUse	T24E	4.66	4.19
tblEnergyUse	T24E	3.18	2.86
tblEnergyUse	T24E	331.07	1,102.00
tblEnergyUse	T24E	0.00	0.21
tblEnergyUse	T24NG	4.31	3.88
tblEnergyUse	T24NG	3,248.74	4.28
tblEnergyUse	T24NG	5.44	4.90
tblEnergyUse	T24NG	15.99	14.39
tblEnergyUse	T24NG	1.14	1.03
tblEnergyUse	T24NG	19,206.92	17,700.00
tblEnergyUse	T24NG	0.00	4.65
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tblFireplaces	FireplaceDayYear	82.00	0.00
tblFireplaces	FireplaceDayYear	82.00	0.00
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tblFireplaces	FireplaceHourDay	3.00	0.00
tblFireplaces	FireplaceWoodMass	3,078.40	0.00
tblFireplaces	FireplaceWoodMass	3,078.40	0.00
tblFireplaces	FireplaceWoodMass	3,078.40	0.00
tblFireplaces	NumberGas	82.50	0.00

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tblFireplaces	NumberGas	606.65	13.00
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tblFireplaces	NumberNoFireplace	1.30	10.00
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tblFireplaces	NumberWood	386.05	0.00
tblFireplaces	NumberWood	4.55	0.00
tblLandUse	LandUseSquareFeet	0.00	61,477.00
tblLandUse	LotAcreage	0.00	38.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	0.00
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tblOffRoadEquipment	OffRoadEquipmentUnitAmount	2.00	0.00
tblProjectCharacteristics	CO2IntensityFactor	720.49	441.1
tblProjectCharacteristics	UrbanizationLevel	Urban	Rural
tblSequestration	NumberOfNewTrees	0.00	6,000.00
tblSolidWaste	SolidWasteGenerationRate	0.83	0.00
tblSolidWaste	SolidWasteGenerationRate	0.95	0.00
tblSolidWaste	SolidWasteGenerationRate	69.00	0.00
tblSolidWaste	SolidWasteGenerationRate	78.00	0.00
tblSolidWaste	SolidWasteGenerationRate	9.30	0.00
tblSolidWaste	SolidWasteGenerationRate	10.50	0.00
tblSolidWaste	SolidWasteGenerationRate	1,293.55	1,314.00
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tblVehicleTrips	CC_TL	6.60	9.71
tblVehicleTrips	CC_TL	0.00	9.71
tblVehicleTrips	CC_TL	6.60	9.71

tblVehicleTrips	CC_TL	6.60	9.71
tblVehicleTrips	CC_TL	6.60	9.71
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tblVehicleTrips	DV_TP	28.00	0.00
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tblVehicleTrips	SU_TR	16.74	38.97
tblVehicleTrips	SU_TR	3.43	5.78
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tblWater	IndoorWaterUseRate	12,923,103.53	3,328,800.00
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tblWater	IndoorWaterUseRate	9,773,103.84	5,475,000.00
tblWater	IndoorWaterUseRate	1,739,815.03	3,225,049.00
tblWater	IndoorWaterUseRate	1,734,375.00	814,406.00
tblWater	IndoorWaterUseRate	740,725.21	879,559.00
tblWater	IndoorWaterUseRate	71,864,890.26	113,099,813.00
tblWater	IndoorWaterUseRate	0.00	2,372,500.00
tblWater	OutdoorWaterUseRate	824,878.95	3,328,800.00
tblWater	OutdoorWaterUseRate	13,225,442.98	13,575,263.00
tblWater	OutdoorWaterUseRate	6,161,304.60	5,475,000.00
tblWater	OutdoorWaterUseRate	4,473,810.08	3,225,049.00
tblWater	OutdoorWaterUseRate	0.00	814,406.00

tblWater	OutdoorWaterUseRate	453,992.87	879,559.00
tblWater	OutdoorWaterUseRate	45,306,126.47	133,099,813.00
tblWater	OutdoorWaterUseRate	0.00	2,372,500.00
tblWoodstoves	NumberCatalytic	7.50	0.00
tblWoodstoves	NumberCatalytic	55.15	0.00
tblWoodstoves	NumberCatalytic	0.65	0.00
tblWoodstoves	NumberNoncatalytic	7.50	0.00
tblWoodstoves	NumberNoncatalytic	55.15	0.00
tblWoodstoves	NumberNoncatalytic	0.65	0.00
tblWoodstoves	WoodstoveDayYear	82.00	0.00
tblWoodstoves	WoodstoveDayYear	82.00	0.00
tblWoodstoves	WoodstoveDayYear	82.00	0.00
tblWoodstoves	WoodstoveWoodMass	3,019.20	0.00
tblWoodstoves	WoodstoveWoodMass	3,019.20	0.00
tblWoodstoves	WoodstoveWoodMass	3,019.20	0.00

2.0 Emissions Summary

2.1 Overall Construction

Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2019	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
2020	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
2021	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Maximum	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2019	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
2020	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
2021	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Maximum	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

Quarter	Start Date	End Date	Maximum Unmitigated ROG + NOX (tons/quarter)	Maximum Mitigated ROG + NOX (tons/quarter)
		Highest		

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	11.2774	0.1082	9.3913	5.0000e-004		0.0521	0.0521		0.0521	0.0521	0.0000	15.3551	15.3551	0.0147	0.0000	15.7227
Energy	0.1381	1.1808	0.5095	7.5300e-003		0.0954	0.0954		0.0954	0.0954	0.0000	2,661.0206	2,661.0206	0.1113	0.0427	2,676.5160
Mobile	2.4994	10.6747	32.2889	0.1327	14.3812	0.0937	14.4749	3.8497	0.0871	3.9367	0.0000	12,310.1213	12,310.1213	0.5840	0.0000	12,324.7224
Waste						0.0000	0.0000		0.0000	0.0000	266.7301	0.0000	266.7301	15.7633	0.0000	660.8126
Water						0.0000	0.0000		0.0000	0.0000	42.4233	710.1925	752.6158	4.4040	0.1126	896.2533
Total	**13.9149**	**11.9637**	**42.1897**	**0.1407**	**14.3812**	**0.2412**	**14.6224**	**3.8497**	**0.2346**	**4.0842**	**309.1534**	**15,696.6894**	**16,005.8428**	**20.8773**	**0.1552**	**16,574.0270**

2.2 Overall Operational

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	11.2774	0.1082	9.3913	5.0000e-004		0.0521	0.0521		0.0521	0.0521	0.0000	15.3551	15.3551	0.0147	0.0000	15.7227
Energy	0.1381	1.1808	0.5095	7.5300e-003		0.0954	0.0954		0.0954	0.0954	0.0000	2,661.0206	2,661.0206	0.1113	0.0427	2,676.5160
Mobile	2.4994	10.6747	32.2889	0.1327	14.3812	0.0937	14.4749	3.8497	0.0871	3.9367	0.0000	12,310.1213	12,310.1213	0.5840	0.0000	12,324.7224
Waste						0.0000	0.0000		0.0000	0.0000	266.7301	0.0000	266.7301	15.7633	0.0000	660.8126
Water						0.0000	0.0000		0.0000	0.0000	42.4233	710.1925	752.6158	4.4040	0.1126	896.2533
Total	**13.9149**	**11.9637**	**42.1897**	**0.1407**	**14.3812**	**0.2412**	**14.6224**	**3.8497**	**0.2346**	**4.0842**	**309.1534**	**15,696.6894**	**16,005.8428**	**20.8773**	**0.1552**	**16,574.0270**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

2.3 Vegetation

Vegetation

	CO2e
Category	MT
New Trees	4,248.0000
Total	**4,248.0000**

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Demolition	Demolition	8/29/2019	7/28/2021	5	500	

Acres of Grading (Site Preparation Phase): 0

Acres of Grading (Grading Phase): 0

Acres of Paving: 0

Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 0; Non-Residential Outdoor: 0; Striped Parking Area: 0 (Architectural Coating – sqft)

OffRoad Equipment

Proposed Project Amendment Operational Res - San Diego County, Annual

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Demolition	Concrete/Industrial Saws	0	8.00	81	0.73
Demolition	Excavators	0	8.00	158	0.38
Demolition	Rubber Tired Dozers	0	8.00	247	0.40

Trips and VMT

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Demolition	0	0.00	0.00	0.00	16.80	6.60	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

3.2 Demolition - 2019

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**0.0000**	**0.0000**	**0.0000**	**0.0000**		**0.0000**	**0.0000**		**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

3.2 Demolition - 2019

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**0.0000**	**0.0000**	**0.0000**	**0.0000**		**0.0000**	**0.0000**		**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

3.2 Demolition - 2019

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

3.2 Demolition - 2020

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**0.0000**	**0.0000**	**0.0000**	**0.0000**		**0.0000**	**0.0000**		**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

3.2 Demolition - 2020

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**0.0000**	**0.0000**	**0.0000**	**0.0000**		**0.0000**	**0.0000**		**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

3.2 Demolition - 2020

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

3.2 Demolition - 2021

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**0.0000**	**0.0000**	**0.0000**	**0.0000**		**0.0000**	**0.0000**		**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

3.2 Demolition - 2021

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**0.0000**	**0.0000**	**0.0000**	**0.0000**		**0.0000**	**0.0000**		**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

3.2 Demolition - 2021

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	2.4994	10.6747	32.2889	0.1327	14.3812	0.0937	14.4749	3.8497	0.0871	3.9367	0.0000	12,310.1213	12,310.1213	0.5840	0.0000	12,324.7224
Unmitigated	2.4994	10.6747	32.2889	0.1327	14.3812	0.0937	14.4749	3.8497	0.0871	3.9367	0.0000	12,310.1213	12,310.1213	0.5840	0.0000	12,324.7224

4.2 Trip Summary Information

	Average Daily Trip Rate			Unmitigated	Mitigated
Land Use	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Arena	0.00	0.00	0.00		
City Park	0.00	0.00	0.00		
Condo/Townhouse High Rise	1,056.00	1,089.00	867.00	3,653,601	3,653,601
Elementary School	0.00	0.00	0.00		
Industrial Park	0.00	0.00	0.00		
Parking Lot	0.00	0.00	0.00		
Regional Shopping Center	0.00	0.00	0.00		
Single Family Housing	9,706.40	10,103.48	8790.91	34,044,933	34,044,933
User Defined Residential	137.28	142.87	124.28	481,466	481,466
Total	10,899.68	11,335.35	9,782.19	38,180,000	38,180,000

4.3 Trip Type Information

	Miles			Trip %			Trip Purpose %		
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Arena	9.71	9.71	9.71	0.00	81.00	19.00	100	0	0
City Park	9.71	9.71	9.71	33.00	48.00	19.00	100	0	0
Condo/Townhouse High Rise	9.71	9.71	9.71	41.60	18.80	39.60	100	0	0
Elementary School	9.71	9.71	9.71	65.00	30.00	5.00	100	0	0
Industrial Park	9.71	9.71	9.71	59.00	28.00	13.00	100	0	0
Parking Lot	9.71	9.71	9.71	0.00	0.00	0.00	100	0	0
Regional Shopping Center	9.71	9.71	9.71	16.30	64.70	19.00	100	0	0
Single Family Housing	9.71	9.71	9.71	41.60	18.80	39.60	100	0	0
User Defined Residential	9.71	9.71	9.71	41.60	18.80	39.60	100	0	0

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Arena	0.614571	0.037691	0.177673	0.098627	0.012633	0.005296	0.017422	0.025155	0.001929	0.001711	0.005676	0.000778	0.000837
City Park	0.614571	0.037691	0.177673	0.098627	0.012633	0.005296	0.017422	0.025155	0.001929	0.001711	0.005676	0.000778	0.000837
Condo/Townhouse High Rise	0.614571	0.037691	0.177673	0.098627	0.012633	0.005296	0.017422	0.025155	0.001929	0.001711	0.005676	0.000778	0.000837
Elementary School	0.614571	0.037691	0.177673	0.098627	0.012633	0.005296	0.017422	0.025155	0.001929	0.001711	0.005676	0.000778	0.000837
Industrial Park	0.614571	0.037691	0.177673	0.098627	0.012633	0.005296	0.017422	0.025155	0.001929	0.001711	0.005676	0.000778	0.000837
Parking Lot	0.614571	0.037691	0.177673	0.098627	0.012633	0.005296	0.017422	0.025155	0.001929	0.001711	0.005676	0.000778	0.000837
Regional Shopping Center	0.614571	0.037691	0.177673	0.098627	0.012633	0.005296	0.017422	0.025155	0.001929	0.001711	0.005676	0.000778	0.000837
Single Family Housing	0.614571	0.037691	0.177673	0.098627	0.012633	0.005296	0.017422	0.025155	0.001929	0.001711	0.005676	0.000778	0.000837
User Defined Residential	0.614571	0.037691	0.177673	0.098627	0.012633	0.005296	0.017422	0.025155	0.001929	0.001711	0.005676	0.000778	0.000837

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Electricity Mitigated						0.0000	0.0000		0.0000	0.0000	0.0000	1,294.7143	1,294.7143	0.0851	0.0176	1,302.0904
Electricity Unmitigated						0.0000	0.0000		0.0000	0.0000	0.0000	1,294.7143	1,294.7143	0.0851	0.0176	1,302.0904
NaturalGas Mitigated	0.1381	1.1808	0.5095	7.5300e-003		0.0954	0.0954		0.0954	0.0954	0.0000	1,366.3063	1,366.3063	0.0262	0.0251	1,374.4256
NaturalGas Unmitigated	0.1381	1.1808	0.5095	7.5300e-003		0.0954	0.0954		0.0954	0.0954	0.0000	1,366.3063	1,366.3063	0.0262	0.0251	1,374.4256

5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
Condo/Townhouse High Rise	642	0.0000	3.0000e-005	1.0000e-005	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0343	0.0343	0.0000	0.0000	0.0345
Single Family Housing	2.52587e+007	0.1362	1.1639	0.4953	7.4300e-003		0.0941	0.0941		0.0941	0.0941	0.0000	1,347.9004	1,347.9004	0.0258	0.0247	1,355.9103
User Defined Residential	344271	1.8600e-003	0.0169	0.0142	1.0000e-004		1.2800e-003	1.2800e-003		1.2800e-003	1.2800e-003	0.0000	18.3716	18.3716	3.5000e-004	3.4000e-004	18.4808
Total		**0.1381**	**1.1808**	**0.5095**	**7.5300e-003**		**0.0954**	**0.0954**		**0.0954**	**0.0954**	**0.0000**	**1,366.3063**	**1,366.3063**	**0.0262**	**0.0251**	**1,374.4256**

5.2 Energy by Land Use - NaturalGas

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
Condo/Townhouse High Rise	642	0.0000	3.0000e-005	1.0000e-005	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0343	0.0343	0.0000	0.0000	0.0345
Single Family Housing	2.52587e+007	0.1362	1.1639	0.4953	7.4300e-003		0.0941	0.0941		0.0941	0.0941	0.0000	1,347.9004	1,347.9004	0.0258	0.0247	1,355.9103
User Defined Residential	344271	1.8600e-003	0.0169	0.0142	1.0000e-004		1.2800e-003	1.2800e-003		1.2800e-003	1.2800e-003	0.0000	18.3716	18.3716	3.5000e-004	3.4000e-004	18.4808
Total		**0.1381**	**1.1808**	**0.5095**	**7.5300e-003**		**0.0954**	**0.0954**		**0.0954**	**0.0954**	**0.0000**	**1,366.3063**	**1,366.3063**	**0.0262**	**0.0251**	**1,374.4256**

5.3 Energy by Land Use - Electricity

Unmitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Condo/Townhouse High Rise	691.5	0.1384	1.0000e-005	0.0000	0.1391
Single Family Housing	6.39961e+006	1,280.4306	0.0842	0.0174	1,287.7253
User Defined Residential	70698.5	14.1453	9.3000e-004	1.9000e-004	14.2259
Total		**1,294.7143**	**0.0851**	**0.0176**	**1,302.0904**

5.3 Energy by Land Use - Electricity

Mitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Condo/Townhouse High Rise	691.5	0.1384	1.0000e-005	0.0000	0.1391
Single Family Housing	6.39961e+006	1,280.4306	0.0842	0.0174	1,287.7253
User Defined Residential	70698.5	14.1453	9.3000e-004	1.9000e-004	14.2259
Total		**1,294.7143**	**0.0851**	**0.0176**	**1,302.0904**

6.0 Area Detail

6.1 Mitigation Measures Area

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	11.2774	0.1082	9.3913	5.0000e-004		0.0521	0.0521		0.0521	0.0521	0.0000	15.3551	15.3551	0.0147	0.0000	15.7227
Unmitigated	11.2774	0.1082	9.3913	5.0000e-004		0.0521	0.0521		0.0521	0.0521	0.0000	15.3551	15.3551	0.0147	0.0000	15.7227

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	2.4155					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	8.5799					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Hearth	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	0.2820	0.1082	9.3913	5.0000e-004		0.0521	0.0521		0.0521	0.0521	0.0000	15.3551	15.3551	0.0147	0.0000	15.7227
Total	**11.2774**	**0.1082**	**9.3913**	**5.0000e-004**		**0.0521**	**0.0521**		**0.0521**	**0.0521**	**0.0000**	**15.3551**	**15.3551**	**0.0147**	**0.0000**	**15.7227**

6.2 Area by SubCategory

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	2.4155					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	8.5799					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Hearth	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	0.2820	0.1082	9.3913	5.0000e-004		0.0521	0.0521		0.0521	0.0521	0.0000	15.3551	15.3551	0.0147	0.0000	15.7227
Total	**11.2774**	**0.1082**	**9.3913**	**5.0000e-004**		**0.0521**	**0.0521**		**0.0521**	**0.0521**	**0.0000**	**15.3551**	**15.3551**	**0.0147**	**0.0000**	**15.7227**

7.0 Water Detail

7.1 Mitigation Measures Water

Proposed Project Amendment Operational Res - San Diego County, Annual

	Total CO2	CH4	N2O	CO2e
Category	MT/yr			
Mitigated	752.6158	4.4040	0.1126	896.2533
Unmitigated	752.6158	4.4040	0.1126	896.2533

7.2 Water by Land Use

Unmitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
Arena	3.3288 / 3.3288	17.1279	0.1095	2.7800e-003	20.6945
City Park	4.52509 / 13.5753	43.4008	0.1502	4.0500e-003	48.3636
Condo/Townhouse High Rise	5.475 / 5.475	28.1709	0.1801	4.5700e-003	34.0369
Elementary School	3.22505 / 3.22505	16.5941	0.1061	2.6900e-003	20.0495
Industrial Park	0.814406 / 0.814406	4.1904	0.0268	6.8000e-004	5.0630
Parking Lot	0 / 0	0.0000	0.0000	0.0000	0.0000
Regional Shopping Center	0.879559 / 0.879559	4.5257	0.0289	7.3000e-004	5.4680
Single Family Housing	113.1 / 133.1	626.3986	3.7242	0.0951	747.8286
User Defined Residential	2.3725 / 2.3725	12.2074	0.0781	1.9800e-003	14.7493
Total		**752.6158**	**4.4040**	**0.1125**	**896.2534**

7.2 Water by Land Use

Mitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
Arena	3.3288 / 3.3288	17.1279	0.1095	2.7800e-003	20.6945
City Park	4.52509 / 13.5753	43.4008	0.1502	4.0500e-003	48.3636
Condo/Townhouse High Rise	5.475 / 5.475	28.1709	0.1801	4.5700e-003	34.0369
Elementary School	3.22505 / 3.22505	16.5941	0.1061	2.6900e-003	20.0495
Industrial Park	0.814406 / 0.814406	4.1904	0.0268	6.8000e-004	5.0630
Parking Lot	0 / 0	0.0000	0.0000	0.0000	0.0000
Regional Shopping Center	0.879559 / 0.879559	4.5257	0.0289	7.3000e-004	5.4680
Single Family Housing	113.1 / 133.1	626.3986	3.7242	0.0951	747.8286
User Defined Residential	2.3725 / 2.3725	12.2074	0.0781	1.9800e-003	14.7493
Total		**752.6158**	**4.4040**	**0.1125**	**896.2534**

8.0 Waste Detail

8.1 Mitigation Measures Waste

Category/Year

	Total CO2	CH4	N2O	CO2e
	MT/yr			
Mitigated	266.7301	15.7633	0.0000	660.8126
Unmitigated	266.7301	15.7633	0.0000	660.8126

8.2 Waste by Land Use

Unmitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
Arena	0	0.0000	0.0000	0.0000	0.0000
City Park	0	0.0000	0.0000	0.0000	0.0000
Condo/Townhouse High Rise	0	0.0000	0.0000	0.0000	0.0000
Elementary School	0	0.0000	0.0000	0.0000	0.0000
Industrial Park	0	0.0000	0.0000	0.0000	0.0000
Parking Lot	0	0.0000	0.0000	0.0000	0.0000
Regional Shopping Center	0	0.0000	0.0000	0.0000	0.0000
Single Family Housing	1314	266.7301	15.7633	0.0000	660.8126
User Defined Residential	0	0.0000	0.0000	0.0000	0.0000
Total		**266.7301**	**15.7633**	**0.0000**	**660.8126**

8.2 Waste by Land Use

Mitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
Arena	0	0.0000	0.0000	0.0000	0.0000
City Park	0	0.0000	0.0000	0.0000	0.0000
Condo/Townhouse High Rise	0	0.0000	0.0000	0.0000	0.0000
Elementary School	0	0.0000	0.0000	0.0000	0.0000
Industrial Park	0	0.0000	0.0000	0.0000	0.0000
Parking Lot	0	0.0000	0.0000	0.0000	0.0000
Regional Shopping Center	0	0.0000	0.0000	0.0000	0.0000
Single Family Housing	1314	266.7301	15.7633	0.0000	660.8126
User Defined Residential	0	0.0000	0.0000	0.0000	0.0000
Total		**266.7301**	**15.7633**	**0.0000**	**660.8126**

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type

10.0 Stationary Equipment

Fire Pumps and Emergency Generators

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type

Boilers

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type

User Defined Equipment

Equipment Type	Number

11.0 Vegetation

	Total CO2	CH4	N2O	CO2e
Category	MT			
Unmitigated	4,248.0000	0.0000	0.0000	4,248.0000

11.2 Net New Trees

Species Class

	Number of Trees	Total CO2	CH4	N2O	CO2e
		MT			
Miscellaneous	6000	4,248.0000	0.0000	0.0000	4,248.0000
Total		**4,248.0000**	**0.0000**	**0.0000**	**4,248.0000**

ATTACHMENT 3 – CALEEMOD OUTPUT FILES (.PDF) FOR SEQEUSTRATION

PPA Open Space

San Diego County, Annual

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
City Park	1.00	Acre	1.00	43,560.00	0

1.2 Other Project Characteristics

Urbanization	Urban	**Wind Speed (m/s)**	2.6	**Precipitation Freq (Days)**	40
Climate Zone	13			**Operational Year**	2028
Utility Company	San Diego Gas & Electric				
CO2 Intensity (lb/MWhr)	427.49	**CH4 Intensity (lb/MWhr)**	0.029	**N2O Intensity (lb/MWhr)**	0.006

1.3 User Entered Comments & Non-Default Data

Project Characteristics - Open space carbon sequestration only.

Land Use -

Off-road Equipment - No construction

Trips and VMT - Construction only

Vehicle Trips - No operation

Vehicle Emission Factors -

Vehicle Emission Factors -

Vehicle Emission Factors -

Woodstoves -

Area Coating -

Energy Use -

Water And Wastewater - No operation

Solid Waste - No operation

Area Mitigation -

Energy Mitigation -

Waste Mitigation -

Construction Phase - No construction

Land Use Change - coastal sage/chaparral habitat

Sequestration -

PPA Open Space - San Diego County, Annual

Table Name	Column Name	Default Value	New Value
tblConstructionPhase	NumDays	100.00	1.00
tblConstructionPhase	PhaseEndDate	7/1/2020	2/13/2020
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	0.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	0.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	0.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	0.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	3.00	0.00
tblProjectCharacteristics	CO2IntensityFactor	720.49	427.49
tblSolidWaste	SolidWasteGenerationRate	0.09	0.00
tblTripsAndVMT	VendorTripNumber	7.00	0.00
tblTripsAndVMT	WorkerTripNumber	18.00	0.00
tblVehicleTrips	ST_TR	22.75	0.00
tblVehicleTrips	SU_TR	16.74	0.00
tblVehicleTrips	WD_TR	1.89	0.00
tblWater	ElectricityIntensityFactorForWastewaterTreatment	1,911.00	0.00
tblWater	ElectricityIntensityFactorToDistribute	1,272.00	0.00
tblWater	ElectricityIntensityFactorToSupply	9,727.00	0.00
tblWater	ElectricityIntensityFactorToTreat	111.00	0.00
tblWater	OutdoorWaterUseRate	1,191,481.35	0.00

2.0 Emissions Summary

2.1 Overall Construction

Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2020	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Maximum	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2020	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Maximum	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

Quarter	Start Date	End Date	Maximum Unmitigated ROG + NOX (tons/quarter)	Maximum Mitigated ROG + NOX (tons/quarter)
		Highest		

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	4.1000e-004	0.0000	1.0000e-005	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	2.0000e-005	2.0000e-005	0.0000	0.0000	2.0000e-005
Energy	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Mobile	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Waste						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Water						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**4.1000e-004**	**0.0000**	**1.0000e-005**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**2.0000e-005**	**2.0000e-005**	**0.0000**	**0.0000**	**2.0000e-005**

2.2 Overall Operational

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	4.1000e-004	0.0000	1.0000e-005	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	2.0000e-005	2.0000e-005	0.0000	0.0000	2.0000e-005
Energy	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Mobile	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Waste						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Water						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**4.1000e-004**	**0.0000**	**1.0000e-005**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**2.0000e-005**	**2.0000e-005**	**0.0000**	**0.0000**	**2.0000e-005**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

2.3 Vegetation

Vegetation

	CO2e
Category	MT
Vegetation Land Change	2,288.6100
Total	**2,288.6100**

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Building Construction	Building Construction	2/13/2020	2/13/2020	5	1	

Acres of Grading (Site Preparation Phase): 0

Acres of Grading (Grading Phase): 0

Acres of Paving: 0

Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 0; Non-Residential Outdoor: 0; Striped Parking Area: 0 (Architectural Coating – sqft)

OffRoad Equipment

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Building Construction	Cranes	0	6.00	231	0.29
Building Construction	Forklifts	0	6.00	89	0.20
Building Construction	Generator Sets	0	8.00	84	0.74
Building Construction	Tractors/Loaders/Backhoes	0	6.00	97	0.37
Building Construction	Welders	0	8.00	46	0.45
Building Construction		0			
Building Construction		0			
Building Construction		0			

Trips and VMT

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Building Construction	0	0.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

3.2 Building Construction - 2020

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**0.0000**	**0.0000**	**0.0000**	**0.0000**		**0.0000**	**0.0000**		**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

3.2 Building Construction - 2020

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**0.0000**	**0.0000**	**0.0000**	**0.0000**		**0.0000**	**0.0000**		**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Unmitigated	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000

4.2 Trip Summary Information

	Average Daily Trip Rate			Unmitigated	Mitigated
Land Use	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
City Park	0.00	0.00	0.00		
Total	0.00	0.00	0.00		

4.3 Trip Type Information

	Miles			Trip %			Trip Purpose %		
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
City Park	9.50	7.30	7.30	33.00	48.00	19.00	66	28	6

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
City Park	0.614571	0.037691	0.177673	0.098627	0.012633	0.005296	0.017422	0.025155	0.001929	0.001711	0.005676	0.000778	0.000837

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Electricity Mitigated						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Electricity Unmitigated						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
NaturalGas Mitigated	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
NaturalGas Unmitigated	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000

5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
City Park	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total		**0.0000**	**0.0000**	**0.0000**	**0.0000**		**0.0000**	**0.0000**		**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
City Park	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total		**0.0000**	**0.0000**	**0.0000**	**0.0000**		**0.0000**	**0.0000**		**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

5.3 Energy by Land Use - Electricity

Unmitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
City Park	0	0.0000	0.0000	0.0000	0.0000
Total		**0.0000**	**0.0000**	**0.0000**	**0.0000**

Mitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
City Park	0	0.0000	0.0000	0.0000	0.0000
Total		**0.0000**	**0.0000**	**0.0000**	**0.0000**

6.0 Area Detail

6.1 Mitigation Measures Area

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	4.1000e-004	0.0000	1.0000e-005	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	2.0000e-005	2.0000e-005	0.0000	0.0000	2.0000e-005
Unmitigated	4.1000e-004	0.0000	1.0000e-005	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	2.0000e-005	2.0000e-005	0.0000	0.0000	2.0000e-005

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	4.1000e-004					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	0.0000	0.0000	1.0000e-005	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	2.0000e-005	2.0000e-005	0.0000	0.0000	2.0000e-005
Total	**4.1000e-004**	**0.0000**	**1.0000e-005**	**0.0000**		**0.0000**	**0.0000**		**0.0000**	**0.0000**	**0.0000**	**2.0000e-005**	**2.0000e-005**	**0.0000**	**0.0000**	**2.0000e-005**

6.2 Area by SubCategory

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	4.1000e-004					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	0.0000	0.0000	1.0000e-005	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	2.0000e-005	2.0000e-005	0.0000	0.0000	2.0000e-005
Total	**4.1000e-004**	**0.0000**	**1.0000e-005**	**0.0000**		**0.0000**	**0.0000**		**0.0000**	**0.0000**	**0.0000**	**2.0000e-005**	**2.0000e-005**	**0.0000**	**0.0000**	**2.0000e-005**

7.0 Water Detail

7.1 Mitigation Measures Water

	Total CO2	CH4	N2O	CO2e
Category	MT/yr			
Mitigated	0.0000	0.0000	0.0000	0.0000
Unmitigated	0.0000	0.0000	0.0000	0.0000

7.2 Water by Land Use

Unmitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
City Park	0 / 0	0.0000	0.0000	0.0000	0.0000
Total		**0.0000**	**0.0000**	**0.0000**	**0.0000**

7.2 Water by Land Use

Mitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
City Park	0 / 0	0.0000	0.0000	0.0000	0.0000
Total		**0.0000**	**0.0000**	**0.0000**	**0.0000**

8.0 Waste Detail

8.1 Mitigation Measures Waste

Category/Year

	Total CO2	CH4	N2O	CO2e
	MT/yr			
Mitigated	0.0000	0.0000	0.0000	0.0000
Unmitigated	0.0000	0.0000	0.0000	0.0000

8.2 Waste by Land Use

Unmitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
City Park	0	0.0000	0.0000	0.0000	0.0000
Total		**0.0000**	**0.0000**	**0.0000**	**0.0000**

Mitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
City Park	0	0.0000	0.0000	0.0000	0.0000
Total		**0.0000**	**0.0000**	**0.0000**	**0.0000**

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type

10.0 Stationary Equipment

Fire Pumps and Emergency Generators

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type

Boilers

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type

User Defined Equipment

Equipment Type	Number

11.0 Vegetation

	Total CO2	CH4	N2O	CO2e
Category	MT			
Unmitigated	2,288.6100	0.0000	0.0000	2,288.6100

11.1 Vegetation Land Change

Vegetation Type

	Initial/Final	Total CO2	CH4	N2O	CO2e
	Acres	MT			
Grassland	0 / 531	2,288.6100	0.0000	0.0000	2,288.6100
Total		**2,288.6100**	**0.0000**	**0.0000**	**2,288.6100**

Attachment 4 – Biological Resources Response Memo

605 THIRD STREET
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MEMORANDUM

To:	Greg Mattson, County of San Diego
From:	Patricia Schuyler, Dudek Barry Jones, HELIX Shelby Howard, HELIX
Subject:	Review of the Hamilton Biological Comment Letter and CDFW Land Conversion Evaluation
Date:	March 6, 2020
cc:	Liz Jackson, Jackson Pendo Development, GDCI Proctor Valley, LP Rob Cameron, Jackson Pendo Development Dave Hubbard, Gatzke Dillion & Balance LLP
Attachment(s):	Attachment A: Summary of Surveys Conducted within the Dispute Resolution Parcels Attachment B: Figures from the Final EIR for the Approved Project Attachment C: Dispute Resolution Land Map – State Owned Lands

The Land Conversion Evaluation (LCE) prepared by California Department of Fish and Wildlife (CDFW) staff dated January 2, 2020, supports the proposed Land Exchange between CDFW and GDCI and recommends that the Wildlife Conservation Board (WCB) approve it, concluding that "the proposed Land Exchange is viewed as being biologically superior to that which would result from implementation of the Current Land Plan." However there are some factual clarifications that should be made in order for the WCB record to be complete and to respond to the Hamilton Biological comment letter submitted to the County on February 17, 2020. This memo provides such clarifications to the LCE.

1 Baseline Status Items 5 and 6: PV1, PV2, and PV3

Section 1, Baseline Status, of the LCE states that "the DRA Parties differ as to the development status of PV1, PV2, and PV3." The LCE further states, "The Current Land Plan (Exhibit A of the Dispute Resolution Agreement), except for parcels PV1, PV2, and PV3, are authorized for development pursuant to the MSCP permits" (page 1). Although the Dispute Resolution Agreement (DRA) Parties may differ as to whether take authorization has been granted to PV1, PV2, and PV3 through the Multiple Species Conservation Program (MSCP), there is no dispute that the County of San Diego (County)–approved land uses for these parcels contemplate development. The County's General Plan; the Otay Ranch General Development Plan/Subregional Plan (GDP/SRP), which includes the Otay Ranch Resource Management Plan (RMP); and the June 26, 2019, Approved Project's General Plan Amendment, Specific Plan, and Tentative Map are the guiding land use documents for regulatory land use purposes. Each of these documents identifies PV1, PV2, and PV3 as having land use designations that allow development.

It is important to clarify this point, since the LCE could be interpreted as saying that PV1, PV2, and PV3 are already considered MSCP Preserve, when in fact they are not. Although some of the MSCP Subarea Plan exhibits label PV1, PV2, and PV3 as "no-take authorized," that does not eliminate the underlying development land use designation or the ability of the County to revise the no-take designation through an amendment to the MSCP.

2 Baseline Status Item 7: Biological Survey Efforts

The LCE in Item 7 states that "Biological survey efforts were not equal on the lands proposed to be exchanged; therefore, comparison of biological data across different parcels is difficult." Items 7a and 7b then incorrectly indicate that lands owned by GDCI were surveyed between 2014 and 2017, while lands owned by CDFW were only surveyed in 2016. These statements require clarification and, in some cases, correction.

As explained in more detail below, all focused surveys conducted between 2014 and 2017 in support of the Final Environmental Impact Report (FEIR) for the Approved Project *included all CDFW-owned lands.* This is because the CDFW-owned lands were a part of the original land exchange that the FEIR analyzed as an alternative at a project-level of detail (County of San Diego 2019). In addition, the FEIR Land Exchange Alternative includes a complete biological resources technical report per County requirements, and the biological resources technical report covers the lands owned by CDFW. Thus, the CDFW lands were surveyed not just in 2016, but were included in the surveys conducted between 2014 and 2017. Access these parcels required the applicant to obtain entry permits from CDFW. Therefore, the LCE can draw from the numerous surveys conducted throughout the Biological Study Area, including the parcels to be exchanged, to make a complete and equal comparison across all parcels. Updated inventories are not necessary because extensive focused surveys for plants and wildlife were already conducted within these parcels. This information should clarify that both sets of exchange lands received similar survey attention.

In addition, the LCE does not fully describe focused surveys that have occurred within the parcels proposed to be exchanged. Note that all of the surveys were readily available as part of the California Environmental Quality Act review for the Approved Project (see Attachment A). In summary, various focused surveys were conducted within the Biological Study Area[1] associated with the Otay Ranch Village 14 and Planning Areas 16/19 Project between 2014 and 2017. These surveys included the following: vegetation mapping; a jurisdictional delineation;[2] focused rare plant surveys; habitat assessments and focused surveys for Quino checkerspot butterfly (*Euphydryas editha quino*), Hermes copper butterfly (*Lycaena hermes*), and vernal pool branchiopods; and focused surveys for burrowing owl (*Athene cunicularia*), coastal California gnatcatcher (*Polioptila californica californica*), and western spadefoot (*Spea hammondii*). Raptor specialists at H.T. Harvey & Associates surveyed the Biological Study Area and surrounding area for or potential golden eagle (*Aquila chrysaetos*) territorial and breeding activity, and conducted a habitat assessment of the Biological Study Area. A habitat assessment was conducted for arroyo toad (*Anaxyrus californicus*); however, no focused surveys were deemed necessary due to lack of habitat. A detail discussion regarding each of the focused surveys conducted for special-status plant and wildlife species is provided in the attached memo, Summary of Surveys Conducted within the Dispute Resolution Parcels (Attachment A).

[1] The Biological Study Area, approximately 2,900 acres, combines the extent of the "Project Area" defined for the Approved Project and the "Project Area" for the EIR Land Exchange Alternative. The Biological Study Area includes land owned by the Project owner/applicant and land owned by CDFW. The full extent of biological resources mapped during evaluation of the Approved Project and the EIR Land Exchange Alternative can be found within the technical reports prepared for the Approved Project and the alternative.

[2] An updated delineation was conducted in December 2019 as part of the wetland permitting process with the Regional Water Quality Control Board, CDFW, and the U.S. Army Corps of Engineers.

2.1 Crotch Bumble Bee

The California Fish and Game Commission recently voted to make Crotch bumble bee (*Bombus crotchii*) a candidate for listing under the California Endangered Species Act; the final listing decision is not expected until later this year. CDFW has not developed protocol surveys for this species. However, a habitat assessment can be used to determine how much suitable habitat for Crotch bumble bee would be affected by the proposed land exchange. Crotch bumble bee is a generalist and can occur in open grassland and scrub habitats, primarily those with a variety of flowering plant species. Crotch bumble bee has been documented to be most commonly associated with the following plant families: Fabaceae, Apocynaceae, Asteraceae, Lamiaceae, and Boraginaceae. The LCE states that "Habitat quality on both the CDFW and GDCI exchange parcels … appears very well suited to Crotch bumble bee; however, its on-site status is unknown." According the California Natural Diversity Database data, there are occurrences of Crotch bumble bee approximately 5 miles northwest and 6.5 miles southeast of the Project site. Therefore, it would be helpful if the LCE clarified that the proposed land exchange would provide 311.6 acres of contagious habitat preservation beyond what the Approved Project would currently provide, resulting in a likely benefit to Crotch bumble bee.

2.2 Burrowing Owl

The LCE document states that a burrowing owl was detected in Area A (see Section 2, Current Condition, page 4). This is not accurate. To clarify, no burrowing owls were observed during the focused surveys. Rather, in 2015, while conducting rare plant surveys, biologists observed burrowing owl sign consisting of white wash, feathers, and pellets at one location in CDFW Parcel A. However, no actual burrowing owls were observed during the focused surveys or the numerous other surveys conducted within the Biological Study Area.

2.3 Basins

On pages 5 and 10 of the LCE, CDFW states that "vernal basins" observed by CDFW in December 2019 were not documented in the baseline biology information for Area B, nor were they "identified during previous biological surveys for the Current Land Plan." Actually, the "vernal basins" referenced in the LCE were included in focused surveys for listed vernal pool branchiopods and western spadefoot. These surveys showed that features within the land exchange parcels were found to be unoccupied by listed species but did support western spadefoot (Parcels B (one feature) and Proctor Valley Road North (two features) which are exchanged to GDCI and PV3 which is exchanged to CDFW (two features))[3] (see Attachment A and Attachment B for supporting figures from the FEIR). The locations of these features are provided in the FEIR for the Approved Project (see Attachment B), and are discussed in the Biological Resources Technical Memorandum prepared for the Proposed Project Amendment (Dudek 2019, 2020). This portion of the LCE should be updated to reflect the type of data collected by CDFW, as well as the data collected during the 2 years of protocol surveys that Dudek conducted within the Biological Study Area. In short, these are not new, or previously unidentified features.

[3] The two spadefoot features in Proctor Valley Road were impacted in the Approved Project. The FEIR included a discussion of western spadefoot for both the original land exchange alternative and the Approved Project.

In addition, CDFW confirmed that the size of the "vernal basins" observed within Area B (0.35 acres) included not only the five smaller basins, but also their watersheds, as one combined area. Note further that these basins are technically not defined as "vernal pools" pursuant to Flora of the Otay Ranch Vernal Pools, 1990–1991 (Dudek 1992), since they lack at least one indicator plant species "whose distribution in coastal California is completely or substantially restricted to vernal pool basins."

2.4 Vegetation Mapping and Habitat Quality

2.4.1 Vegetation Mapping

The LCE discusses a disagreement regarding the vegetation mapping on R14 covering approximately 9.34 acres of habitat (LCE, page 6). Specifically, Dudek mapped the entire 9.34 acres as disturbed coastal sage scrub, while CDFW and Hamilton (2019) believe only portions should be mapped as disturbed coastal sage scrub, and the remaining polygon should be mapped as non-native grassland. Although Dudek stands by its original mapping designations, the issue is of little material significance, since the 9.34 acres in question represent only 2% of the 391 acres of coastal sage scrub that would be conserved under the proposed Land Exchange. Revising the vegetation would not result in a significantly different conclusion regarding not only the amount of coastal sage scrub that CDFW would be acquiring with the land exchange, but also the large swaths of contiguous habitat that would preserved as part of the land exchange.

2.4.2 Habitat Quality

The LCE states the following regarding habitat quality:

> Because the chamise chaparral on the CDFW Exchange Lands had very intact soils, meaning they appear to be resistant to invasion by non-native grasses and forbs, the habitat quality of the CDFW-owned chaparral is considered superior to most of the CSS proposed to be exchanged from GDCI. Therefore, despite the higher number of acres of CSS provided in the Land Exchange, it is not assessed as having higher habitat quality to what is currently owned by CDFW (page 10).

This statement, however, contradicts the longstanding, agency-adopted MSCP habitat tiering system according to which coastal sage scrub, including disturbed areas, is considered a Tier 2 vegetation community, and chaparral is considered a Tier 3 community (i.e., of lower value).

In addition, the LCE seems to use the occurrence of coastal California gnatcatcher within habitat as the primary factor when determining whether coastal sage scrub is or is not high-quality habitat. While this approach is open to question, the LCE should, but does not, acknowledge that the CDFW parcels contain only 7.5 acres of coastal sage scrub (compared to 391 acres within GDCI exchange parcels), none of which was determined to be occupied by coastal California gnatcatcher during focused surveys. By contrast, pairs of coastal California gnatcatcher were observed within GDCI parcels R-16 and PV3, both of which will be conveyed to CDFW.[4] Therefore, preservation of these occupied parcels would support the continued survival of this species, and would be considered higher-value habitat than unoccupied chaparral.

[4] A single male was identified within the northern portion of PV3, as well, and this area will also be conveyed to CDFW.

If areas of disturbed coastal sage scrub (37.5 acres) were removed from the equivalency analysis, the land exchange (fee title and conservation easement) would still be a net addition of 346.7 acres of coastal sage scrub above what is currently in the Preserve, some of which is occupied by coastal California gnatcatcher (discussed below).

2.5 Coastal California Gnatcatcher

As shown in the statements bulleted in Section 2.5.2, above, the LCE suggests that open areas of chaparral are equal to or better than areas dominated by plant species indicative of coastal sage scrub, some of which are actually occupied by gnatcatcher, while at the same time stating that only areas dominated by California sagebrush are good-quality habitat. The discussions surrounding the quality of coastal sage scrub habitat and how that determination is made are contradictory throughout the LCE.

If, as stated on page 2 of the LCE, the federally threatened coastal California gnatcatcher is a significant driver for the land exchange, and was also the main driver for the MSCP as a whole, then areas that are occupied by the species, PV3 and R-16, as well as those areas that contain the preferred habitat for the species, should be considered higher-value habitat areas for this species as compared to the chaparral-dominated CDFW lands.

The LCE points out that the "High and Very High value modeled habitat on PV1 and PV3 further provides a low-elevation connection favored for species such as the gnatcatcher" (page 8), and that "the relatively low elevation (800-foot elevation or less) and moderate slope topography on and encompassing the west side of the Current Land Plan provides accommodating terrain for efficient dispersal of species such as the California gnatcatcher and other sensitive and common avifauna, lizards, snakes, and small mammals" (page 9). These statements further demonstrate that these areas are of high-value habitat and should not be discounted.

3 Quino Checkerspot Butterfly

The LCE implies that the CDFW parcels subject to the proposed exchange were not surveyed for Quino checkerspot butterfly. This is incorrect. In 2014, Dudek biologists reviewed the entire Biological Study Area, including the CDFW parcels that are part of the proposed land exchange. In 2015, HELIX conducted a Quino checkerspot butterfly habitat assessment, mapped host plants for the species within the Project area, and conducted focused surveys including the CDFW parcels proposed to be exchanged to GDCI. All of this work was conducted following U.S. Fish and Wildlife Service (USFWS) survey protocols. In 2016, the habitat assessment and host plant mapping was updated, another year of protocol surveys were conducted, again following USFWS survey protocol. The 2016 survey effort also included the CDFW parcels proposed to be exchanged to GDCI. In summary, 2 years of Quino checkerspot butterfly habitat assessments, host plant mapping, and focused surveys were conducted for the CDFW parcels proposed to be exchanged to GDCI. There were multiple documented Quino checkerspot butterfly sightings less than 1 mile from the Biological Study Area in 2016, indicating that conditions in 2016 were suitable for Quino checkerspot butterfly presence and activity. Despite these favorable conditions, no Quino checkerspot butterflies were observed during the 2015 and 2016 focused surveys on any of the CDFW or GDCI exchange parcels.

3.1 Host Plants

Based on the 2016 host plant mapping efforts and input from Quino checkerspot butterfly biologists, 2016 was an above-average year for host plant expression, and 2015 was considered an excellent year for host plant expression. Given the above-average to excellent site conditions and host plant expression, and the fact that host plant mapping was conducted across the entire Biological Study Area in 2016 and all of the CDFW parcels in 2015, the host plant mapping data is more than adequate for CDFW to assess the proposed land exchange.

3.2 Survey Timing

The 2016 Quino checkerspot butterfly surveys and results are considered valid because (i) the surveys were conducted in accordance with the 2016 USFWS Survey Protocol, (ii) Quino checkerspot butterfly were documented approximately 1 mile southeast of the southernmost portion of the Village 14 Development Footprint (Dudek 2016) during the same time when surveys for Village 14 were conducted, and (iii) host plant and site conditions were adequate for detecting Quino checkerspot butterfly. The LCE indicates that surveys were not conducted in years considered strong flight years for the Quino checkerspot butterfly (i.e., 2017 and 2019). However, for purposes of assessing the land exchange, the QCB surveys are sufficient so long as they were conducted in an adequate (as opposed to a "strong") flight year. Flight year 2016 meets this criterion, and detailed host plant mapping was conducted in that year.

3.3 Survey Results

Protocol Quino checkerspot butterfly surveys of the Biological Study Area, including the CDFW parcels, were conducted in both 2015 and 2016. In both years, the results were negative, even though 2016 was considered an adequate flight year for Quino checkerspot butterfly.

3.4 Site occupancy

Based on the 2016 protocol surveys, the Biological Study Area was not considered occupied at the time of the surveys. This includes both CDFW and CDGI exchange lands. Non-protocol surveys by USFWS conducted in 2017 within the CDFW exchange lands and existing state and federal lands immediately off site identified a single Quino checkerspot butterfly east of Proctor Valley Road within or immediately adjacent to the CDGI the land exchange parcels, one Quino checkerspot butterfly immediately west of Proctor Valley Road within the CDFW exchange lands, five individuals immediately adjacent to CDGI exchange lands (PV-1), and a single individual adjacent to the northeastern portion of the Planning Areas 16/19 CDGI Preserve and exchange lands.

In 2018, USFWS staff again made incidental observations of Quino checkerspot butterfly at or near the CDFW and CDGI exchange lands. Specifically, USFWS staff sighted one Quino checkerspot butterfly immediately west of Proctor Valley Road. The sighting location is within the CDFW exchange lands. This same sighting would be within the development footprint of Proctor Valley Road for the Proposed Project Alternative.

In 2019, USFWS biologists and non-agency biologists accompanying USFWS again observed Quino checkerspot butterfly in locations near those where they had sighted Quino checkerspot butterfly previously in 2017 and 2018. Specifically, the biologists sighted four Quino checkerspot butterflies west of Proctor Valley Road in and adjacent to CDFW exchange lands; two Quino checkerspot butterflies west of Proctor Valley Road, also within CDFW exchange

lands; two Quino checkerspot butterflies west of CDGI exchange lands near PV-1; and one Quino checkerspot butterfly west of Planning Area 16. Except for the sightings adjacent to PV-1, all of these sightings occur within the CDFW exchange lands.

These findings are consistent with the overall conclusion that the Proctor Valley area has potential to support Quino checkerspot butterfly in low numbers, as evidenced in 2017, 2018, and 2019. More importantly, the sightings 2017 through 2019 are of limited value in terms of comparing the Quino checkerspot butterfly resources within the CDFW and CDGI exchange parcels because the CDGI exchange lands were not surveyed. In the absence of protocol Quino checkerspot butterfly presence/absence data for both CDFW and CDGI lands from 2017 through 2019, direct comparisons between the exchange lands should be based on habitat suitability and host plant resource data collected in 2015 and 2016, as described below.

3.5 Habitat Comparison

As noted above, detailed habitat assessments and host plant mapping were conducted in 2015 and 2016, years considered above average or exceptional for host plant expression. Areas of highest value for Quino checkerspot butterfly have large, dense patches of host plants, adequate nectaring sources, lower non-native weed cover, and intact soils. These determinations can only be made during winter/spring months when host plants and nectaring resources are readily observable. The LCE, however, relies, at least in part, on "Relatively brief site visits … performed in October and December of 2019 by CDFW staff." These assessments by CDFW staff over-emphasize the intact soils component of Quino checkerspot butterfly habitat requirements instead of the detailed data set compiled by the 2015 and 2016 survey efforts. As a result, the LCE overstates the value of portions of the CDFW exchange lands simply because they have intact soils, even though some of these areas had little or no actual Quino checkerspot butterfly host plants. Conversely, some areas of the CDGI exchange lands were undervalued because the soils did not appear to be as intact, yet these same areas have relatively high Quino checkerspot butterfly host plant populations.

In terms of actual host plant acreage, the host plant resources on CDGI exchange lands total 1.922 acres (PV-1: 0.518 acres, PV-3: 0.896 acres, and R-14: 0.508 acres), while CDFW exchange lands total 1.282 acres (Parcel A: 0.633 acres,[5] Parcel B: 0.361 acres, Parcel C: 0.092 acres, and Parcel E: 0.196 acres). CDFW parcels C and E have almost no host plant resources (0.092 acres and 0.196 acres). CDFW Parcel B has limited resources (0.361 acres), while CDFW Parcel A has 0.633 acres of total host plant area, but it would be surrounded by development and Proctor Valley Road without the land exchange. For this reason, we agree with the LCE that CDFW Parcel A's long-term conservation value would be reduced with or without the land exchange.

Although portions of the CDFW land exchange parcels appear favorable for Quino checkerspot butterfly, including the areas where Quino checkerspot butterflies were previously documented, the majority of Parcels B and C occur in the flatter part of Proctor Valley, which has few Quino checkerspot butterfly resources. It is also important to note that Area B would be partially bisected and impacted by the improvement of Proctor Valley Road under the Approved Project.

[5] Excludes 0.429 acres within Proctor Valley Road alignment that will be impacted by the Approved Project and by the proposed Land Exchange footprint.

The CDGI exchange parcels have areas where there are significant host plant polygons, relatively intact soils, and relatively low weed cover. PV-1 and PV-3 also include hill-topping areas for Quino checkerspot butterfly. R-16 also provides hill-topping areas and protection of lands that would be connected to other areas of preserved lands. The LCE would be more balanced if it acknowledged these facts.

4 Administrative or Management Items

Overall, the LCE states that the land exchange "will facilitate more efficient management of the MSCP Preserve" (see page 12, Criteria 2e). The land exchange provides for a consolidation in Preserve design and a reduction in Preserve/development edge from 18.9 miles for the Approved Project to approximately 5.8 miles for the Proposed Project Amendment. Therefore, the reduction is approximately 13.1 miles, or nearly a 70% reduction, in Preserve/development edge. CDFW acquired approximately 1,400 non-contiguous acres in 2003, and inclusion of R-14, R-15, and R-16 in the land exchange creates a contiguous Preserve system (see Attachment C). The LCE expresses concern that the lack of safe access points to PV1 and PV3 could pose a potential management challenge. To clarify, there is no access problem with respect to either parcel. Access to PV3 would be provided from Proctor Valley Road by the existing San Diego Gas & Electric access road within City of San Diego Cornerstone Lands, and access to PV1 can be provided from Proctor Valley Road through Public Park P-2 and the RMP Preserve or through adjacent public lands.

Regarding the need for protective elements against illegal access discussed under the Conversion Criteria 2e and Section 5 of the LCE, under the proposed realignment, the road bed and curb would be at an elevation substantially above that of the surrounding Preserve land. This elevation differential will make it nearly impossible for any vehicle—even an off-highway-vehicle—to gain access to the Preserve from the portion of Proctor Valley Road to be constructed, as required by the Revised Vesting Tentative Map conditions. Further, the Specific Plan (Section C, III – Circulation Plan) and Tentative Map (Sheet 3) depict street sections on Proctor Valley Road that include landscape parkways on either side of the street, landscape medians, no parking, and a split-rail fence (along the community pathway) to restrict vehicular access to the Preserve land. Since the road design would be such that it would be nearly impossible to get from Proctor Valley Road to the Preserve, no additional measures of protection would be necessary to preclude trespass. As to access restrictions specific to area R-14, the existing condition contains barbed-wire fencing. The road grade, street design, and fencing will act in a similar manner as the pipe fencing to prevent illegal dumping and potential off-road-vehicle activity. In addition, the trail system designed as part of the Proposed Project Amendment, would provide access to designated trails while fencing off areas of Preserve. Additionally, access to areas in the Otay Ranch RMP Preserve are the responsibility of a Preserve Owner/Manager or homeowner's association.

The LCE also states that "Vernal pools, including their watershed areas, adjacent to the new road alignment will need additional protective infrastructure." The alignment of Proctor Valley Road was revised in the Approved Project, with no change in the Proposed Project Amendment, to remove the road from the center of an existing vernal pool restoration site, and away from a pool (identified as B2 in the FEIR) known to support western spadefoot and San Diego fairy shrimp. This pool is currently located immediately adjacent to the dirt alignment of Proctor Valley Road, so the alignment reflected in the Approved Project is a benefit over the existing condition.

The LCE raises a comment about fencing and states "fencing will be necessary around the housing developments where they abut the Preserve to protect conserved lands." The planning documents provide for solid fencing/walls around the homes (see Preserve Edge Plan Amendment, Exhibit 16).

The LCE raises a comment about trails and states, "Proposed trails planning will need to be revised to address the new conservation needs, road alignment, and ownerships within Proctor Valley." The Proposed Project Amendment proposed trails have been revised, and the County does not think there are conflicts, but is available to discuss any further concerns. Trails associated with the Proposed Project Amendment are located within the Proctor Valley Road right-of-way, or internally within the development footprint. The Approved Project, and by virtue the Proposed Project Amendment, do not propose new trails within the Preserve. However, the Approved Project does include a trail easement within R-14. The condition of approval for the Approved Project states that this trail easement is subject to Preserve Owner Manager approval. It is unclear at this time how the conservation easement over R-14 will impact the trail easement. The County, project applicant, and CDFW intend to work together on any additional trail issues as appropriate.

5 Conclusion

We thank you for this opportunity to clarify and supplement some of the technical matters raised in the LCE. The land exchange contemplated in the LCE results in a biologically superior project, particularly given improved Preserve design, increased acres of designated Preserve, and the significantly reduced Preserve/development edge. Importantly, our review of the LCE did not identify any significant impacts resulting from the proposed land exchange beyond those already studied in the FEIR certified by the County on June 26, 2019. We believe the evidence generated through this process adequately supports CDFW's conclusion in the LCE that the proposed Land Exchange will enable GDCI to implement a project that is biologically superior to the one approved by the County in June 2019.

6 References

County of San Diego. 2019. *Final Environmental Impact Report: Otay Ranch Village 14 and Planning Areas 16/19 Project*. State Clearinghouse # SCH 2016121042. GPA 16-008, SP 16-002, REZ 16-006, TM 5616, ER-16-19-006 and STP 16-027. May 2019.

Dudek. 1992. *A Report on the Flora of Otay Ranch Vernal Pools*, 1990–1991.

Dudek. 2016. *2016 Focused Quino Checkerspot Butterfly Survey Report for the Proposed Otay Ranch Resort Village (Village 13) Project, County of San Diego, California*. Letter report to Recovery Permit Coordinator (U.S. Fish and Wildlife Service) from Dudek. May 31, 2016.

Dudek. 2019. *Biological Resources Technical Memorandum prepared for the Proposed Project Amendment*. December 2019.

Dudek. 2020. *Biological Resources Technical Memorandum prepared for the Proposed Project Amendment*. December 2019, updated February 21, 2020.

Attachment A

Summary of Surveys Conducted within the Dispute Resolution Parcels

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MEMORANDUM

To:	Liz Jackson, Jackson Pendo Development, GDCI Proctor Valley, LP (GDCI) Rob Cameron, Jackson Pendo Development
From:	Patricia Schuyler, Dudek
Subject:	Summary of Surveys Conducted within the Dispute Resolution Parcels
Date:	February 2020
cc:	Dave Hubbard, Gatzke Dillion & Balance LLP
Attachment(s):	Attachment A: Survey Figures

Dudek is providing this memorandum to summarize the biological survey efforts conducted for the California Department of Fish and Wildlife (CDFW) parcels subject to the Dispute Resolution Agreement (DRA) between CDFW, U.S. Fish and Wildlife Service (USFWS) and GDCI Proctor Valley, LP (GDCI).

1 Summary of Surveys Conducted within the Biological Study Area

Focused surveys for the Biological Study Area[1] associated with the Otay Ranch Village 14 and Planning Areas 16/19 Project were conducted in 2014, 2015, 2016, and 2017 and included the following: vegetation mapping; a jurisdictional delineation; focused rare plant surveys; habitat assessments and focused surveys for Quino checkerspot butterfly (*Euphydryas editha quino*), Hermes copper butterfly (*Lycaena hermes*), and vernal pool branchiopods; and focused surveys for burrowing owl (*Athene cunicularia*), coastal California gnatcatcher (*Polioptila californica californica*), and western spadefoot (*Spea hammondii*). Raptor specialists at H.T. Harvey & Associates surveyed the Biological Study Area and surrounding area for or potential golden eagle (*Aquila chrysaetos*) territorial and breeding activity and conducted a habitat assessment of the Biological Study Area. A habitat assessment was conducted for arroyo toad (*Anaxyrus californicus*); however, no focused surveys were deemed necessary due to lack of habitat. Details regarding each of the focused surveys conducted for special-status plant and wildlife species are described below.

1.1 Rare Plant Surveys

Focused surveys for special-status plant species were conducted in spring 2014 for the entire Biological Study Area, including the CDFW parcels proposed to be exchanged to GDCI. In late spring and early summer 2015, rare plant surveys were conducted again within the Biological Study Area, focusing specifically on those areas subject to the previously proposed land exchange. This included all parcels subject to the current land exchange. In spring and

[1] The Biological Study Area, approximately 2,900 acres, combines the extent of the "Project Area" defined for the Approved Project and the "Project Area" for the EIR Land Exchange Alternative. The Biological Study Area includes land owned by the Project owner/applicant as well as land owned by CDFW. The full extent of biological resources mapped during the evaluation of the Approved Project and the EIR Land Exchange Alternative can be found within the technical reports prepared for the Approved Project and the alternative.

summer 2016, additional focused surveys for just the applicant-owned portion of the Village 14 Development Footprint were conducted. A second season of focused surveys within the areas designated for development in Planning Areas 16/19 were conducted in spring and summer 2017 which includes parcels to be exchanged to CDFW. For each of the survey seasons, nearby reference sites were visited to determine the bloom status of target species, and surveys were initiated based on detection of blooming plants within the reference sites. In summary, two years of focused surveys were conducted for the CDFW owned parcels subject to the land exchange described in the DRA.

1.2 Coastal California Gnatcatcher Focused Surveys

In summer and fall 2014, Dudek biologists conducted focused protocol surveys for coastal California gnatcatcher in suitable habitat within the Biological Study Area (Figure 1). All of the areas mapped as coastal sage scrub within the CDFW owned parcels subject to the land exchange were included in the 2014 focused surveys. No coastal California gnatcatcher were observed within the CDFW parcels.

1.3 Burrowing Owl Habitat Assessment and Focused Surveys

In 2014, Dudek conducted a burrowing owl habitat assessment and one survey pass across the entire Biological Study Area, including CDFW parcels subject to the proposed DRA land exchange (Figure 2). Following the first survey pass, suitable habitat was delineated and subsequent surveys were conducted within those survey areas shown on Figure 2. No burrowing owls were observed during the focused surveys conducted in 2014. In 2015, while conducting rare plant surveys, biologists observed burrowing owl sign consisting of white wash, feathers, and pellets at one location in CDFW Parcel A (Figure 2). However, no actual burrowing owls were observed during the focused surveys or any other surveys conducted within the Biological Study Area.

1.4 Quino Checkerspot Butterfly Habitat Assessments and Focused Surveys

In 2014, Dudek biologists reviewed the entire Biological Study Area to determine which areas could be excluded as Quino checkerspot butterfly habitat. HELIX conducted a Quino checkerspot butterfly habitat assessment and mapped host plants for the species within the previously proposed land exchange alternative development footprint in 2015 (Figure 3). The 2015 habitat assessment, host plant mapped and focused surveys included the CDFW parcels proposed to be exchanged to GDCI. An updated habitat assessment and host plant mapping was conducted in 2016 and included the entire Biological Study Area subject to the previously proposed land exchange alternative (i.e. included development footprint and preserve areas). This survey also included the CDFW parcels proposed to be exchanged to GDCI. In summary, two years of Quino checkerspot butterfly habitat assessments, host plant mapped and focused surveys were conducted for the CDFW parcels proposed to be exchanged to GDCI. No Quino checkerspot butterflies were observed during the 2015 and 2016 focused surveys.

1.5 Hermes Copper Butterfly Habitat Assessments and Focused Surveys

In 2015 and 2017, Dudek mapped Hermes copper butterfly habitat in accordance with the County of San Diego Guidelines for Hermes Copper (*Lycaena hermes*) (Figure 4). The 2015 habitat assessment and surveys focused on the previous development footprint for the land exchange and a 500-foot buffer. The 2017 habitat assessment and surveys included areas of the Approved Project development footprint which were not included in the 2015 surveys. Focused surveys for the CDFW parcels were conducted in 2015. No Hermes copper butterflies were observed during the focused surveys.

1.6 Vernal Pool Branchiopods

A habitat assessment and mapping of potential features (i.e., vernal pools, ephemeral basins, and road ruts) which could support listed vernal pool branchiopods was conducted throughout the Biological Study Area in April and June 2014. Focused wet-season surveys were conducted in the winter to spring 2014/2015 season and included CDFW parcels subject to the proposed DRA land exchange. Dry season surveys were conducted in October 2015. Due to the new USFWS survey guidelines for fairy shrimp and the predicted El Niño conditions for the 2015/2016 wet season, Dudek biologists conducted another wet-season survey, with focus on areas within the development footprint associated with the previous land exchange, including the CDFW parcels subject to the proposed DRA land exchange. Another dry season survey was conducted in November 2016. In summary, two seasons of both wet and dry surveys were conducted for the CDFW parcels subject to the proposed DRA land exchange. Features surveyed are shown on Figure 5.

1.7 Western Spadefoot Focused Surveys

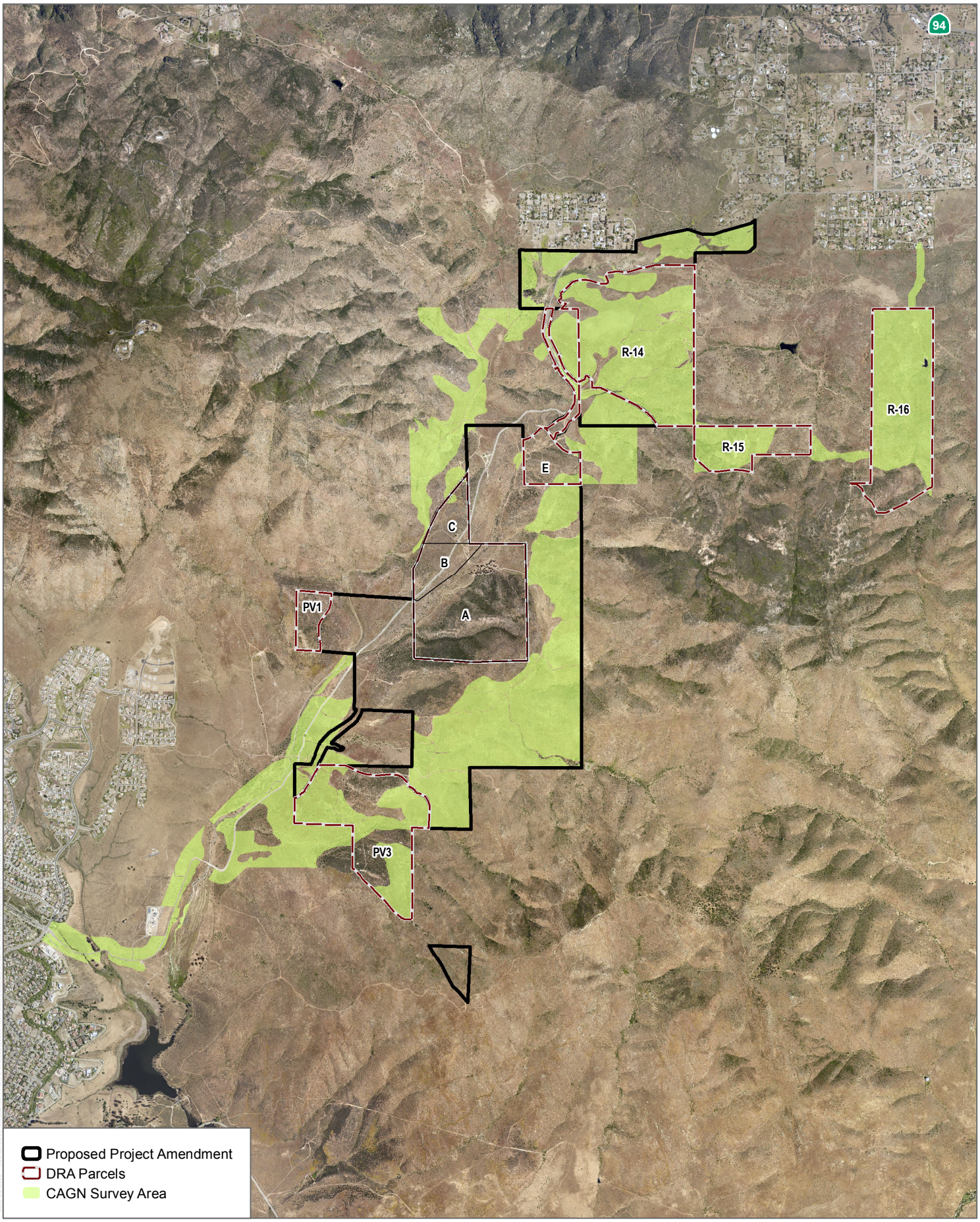
To provide a better understanding of the distribution of western spadefoot within the Biological Study Area, focused surveys for western spadefoot were conducted during the 2016/2017 winter rainy season. Features included in the focused survey were identified based on the vernal pool branchiopod surveys previously conducted and Dudek biologists' familiarity with the Biological Study Area. Within the Biological Study Area, 78 potential suitable habitat areas were included within the focused surveys. Those features which are located within the CDFW parcels proposed to be exchanged to GDCI are shown on Figure 6.

1.8 Golden Eagle Habitat Assessment and Surveys

During the 2016 and 2017 breeding seasons Eagle specialists from H.T. Harvey & Associates surveyed portions of the Biological Study Area (4,000-plus-foot buffer surrounding the development footprints for both the previous land exchange and the Approved Project) for potential golden eagle territorial and breeding activity. The survey area included the locations of the former San Miguel Mountain nest sites and both artificial platforms. The surveys did not reveal any nests or any eagles displaying territorial, courtship, or nesting behavior within the San Miguel, Jamul, or Proctor Valley areas. H.T. Harvey & Associates also reviewed the Biological Study Area for the potential to support foraging habitat for golden eagle. These surveys included the CDFW owned parcels subject to the land exchange described in the DRA.

Attachment A

Survey Figures



SOURCE: SANGIS 2017; Hunsaker 2019

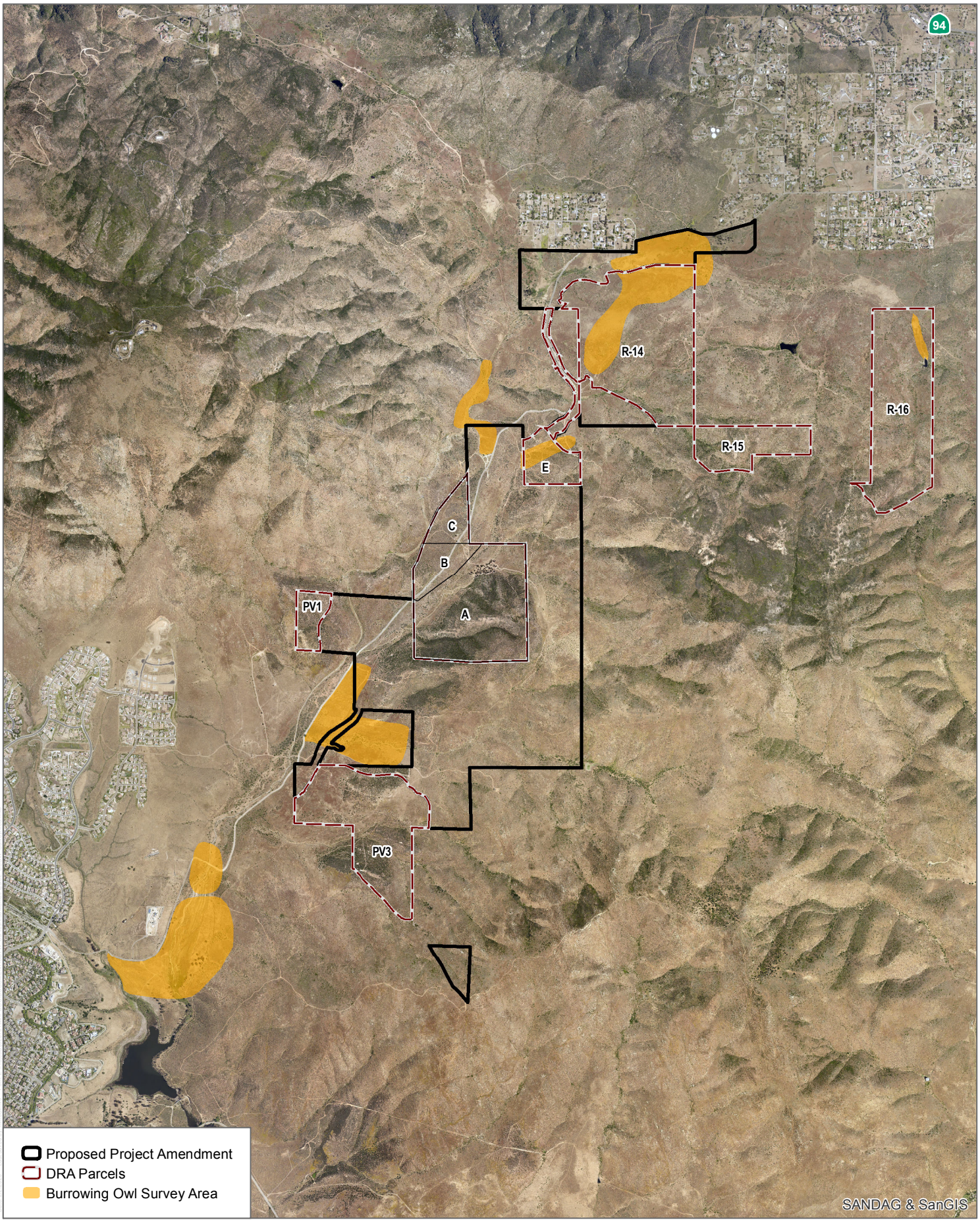
DUDEK

0 1,450 2,900 Feet

FIGURE 1

California Gnatcatcher Survey Area

Summary of Surveys Conducted within the Dispute Resolution Parcels



SOURCE: SANGIS 2017; Hunsaker 2019

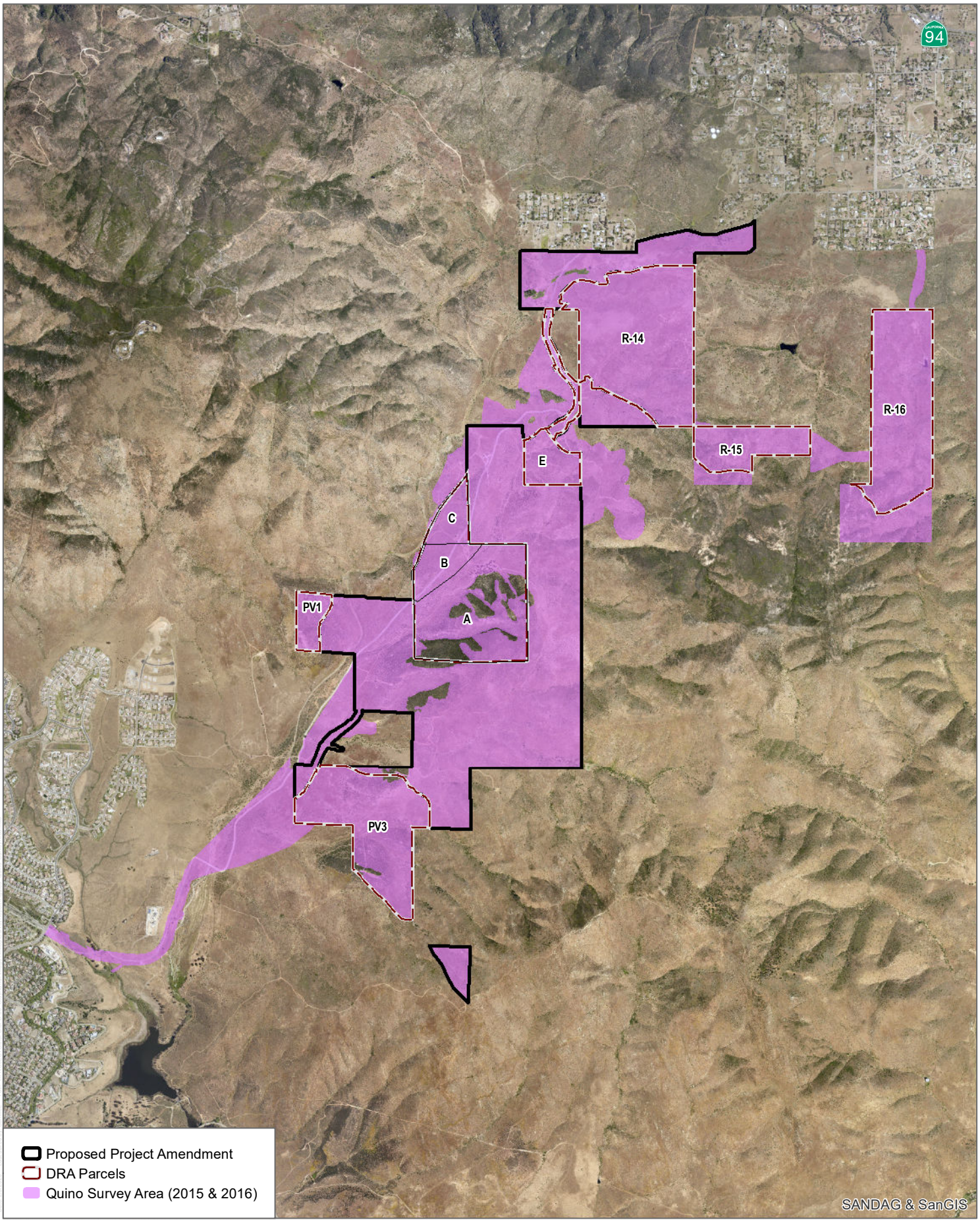
DUDEK

0 1,450 2,900 Feet

FIGURE 2

Burrowing Owl Survey Area

Summary of Surveys Conducted within the Dispute Resolution Parcels



SOURCE: SANGIS 2017; Hunsaker 2019

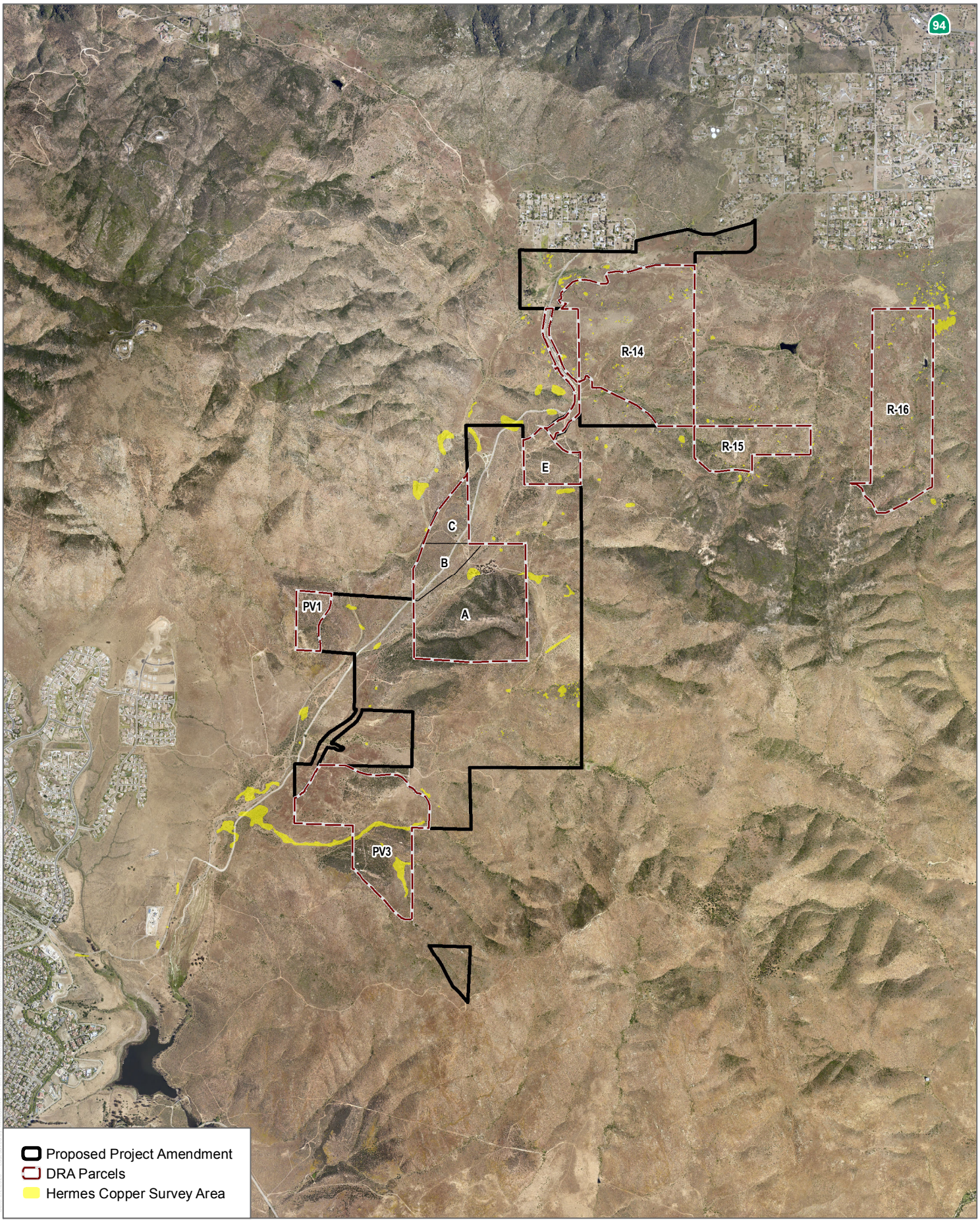
DUDEK

0 1,450 2,900 Feet

FIGURE 3

Quino Survey Area

Summary of Surveys Conducted within the Dispute Resolution Parcels



SOURCE: SANGIS 2017; Hunsaker 2019

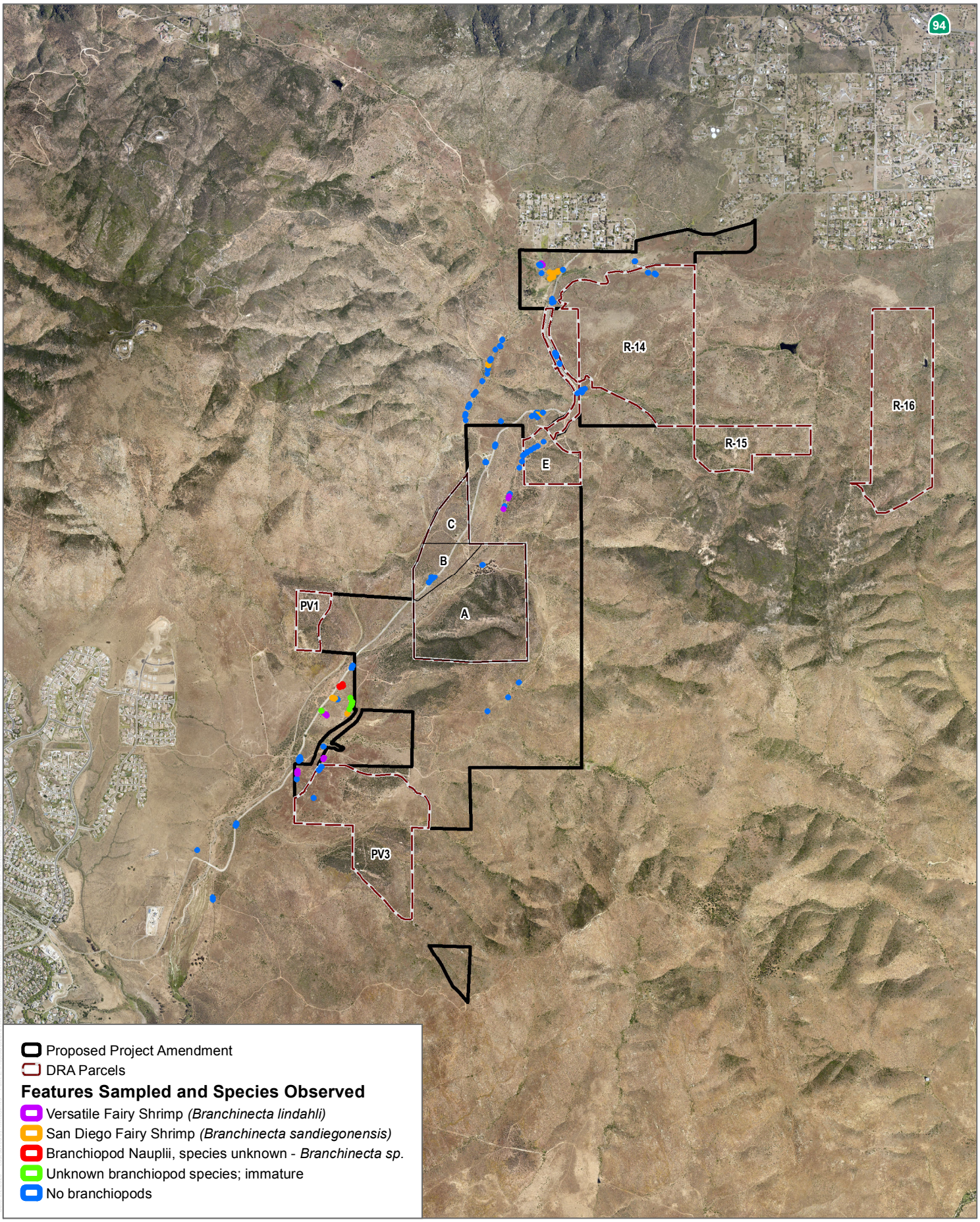
DUDEK

0 1,450 2,900 Feet

FIGURE 4

Hermes Copper Survey Area

Summary of Surveys Conducted within the Dispute Resolution Parcels



SOURCE: SANGIS 2017; Hunsaker 2019

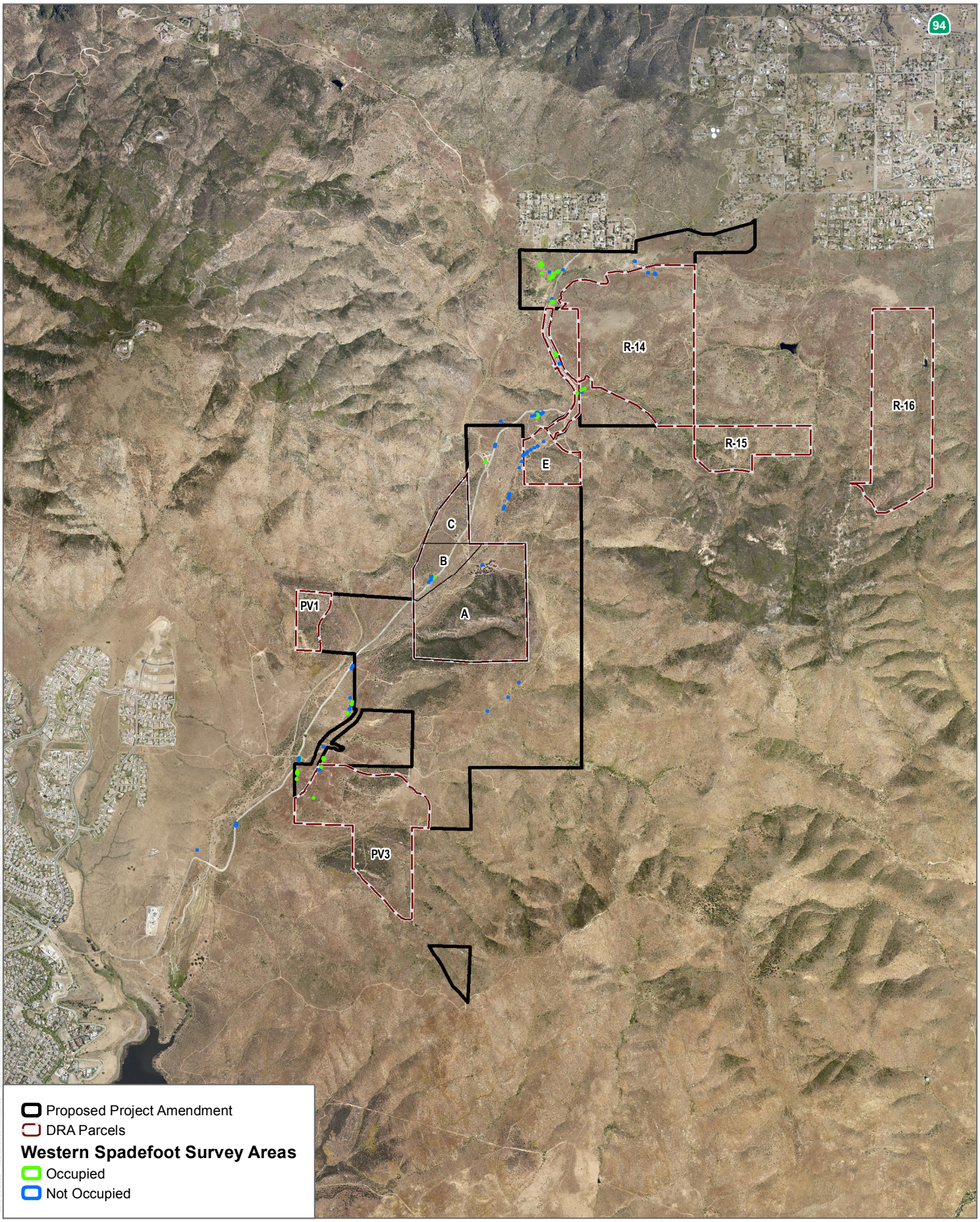
DUDEK

0 1,450 2,900 Feet

FIGURE 5

Fairy Shrimp Survey Area

Summary of Surveys Conducted within the Dispute Resolution Parcels



SOURCE: SANGIS 2017; Hunsaker 2019

DUDEK

0 1,450 2,900 Feet

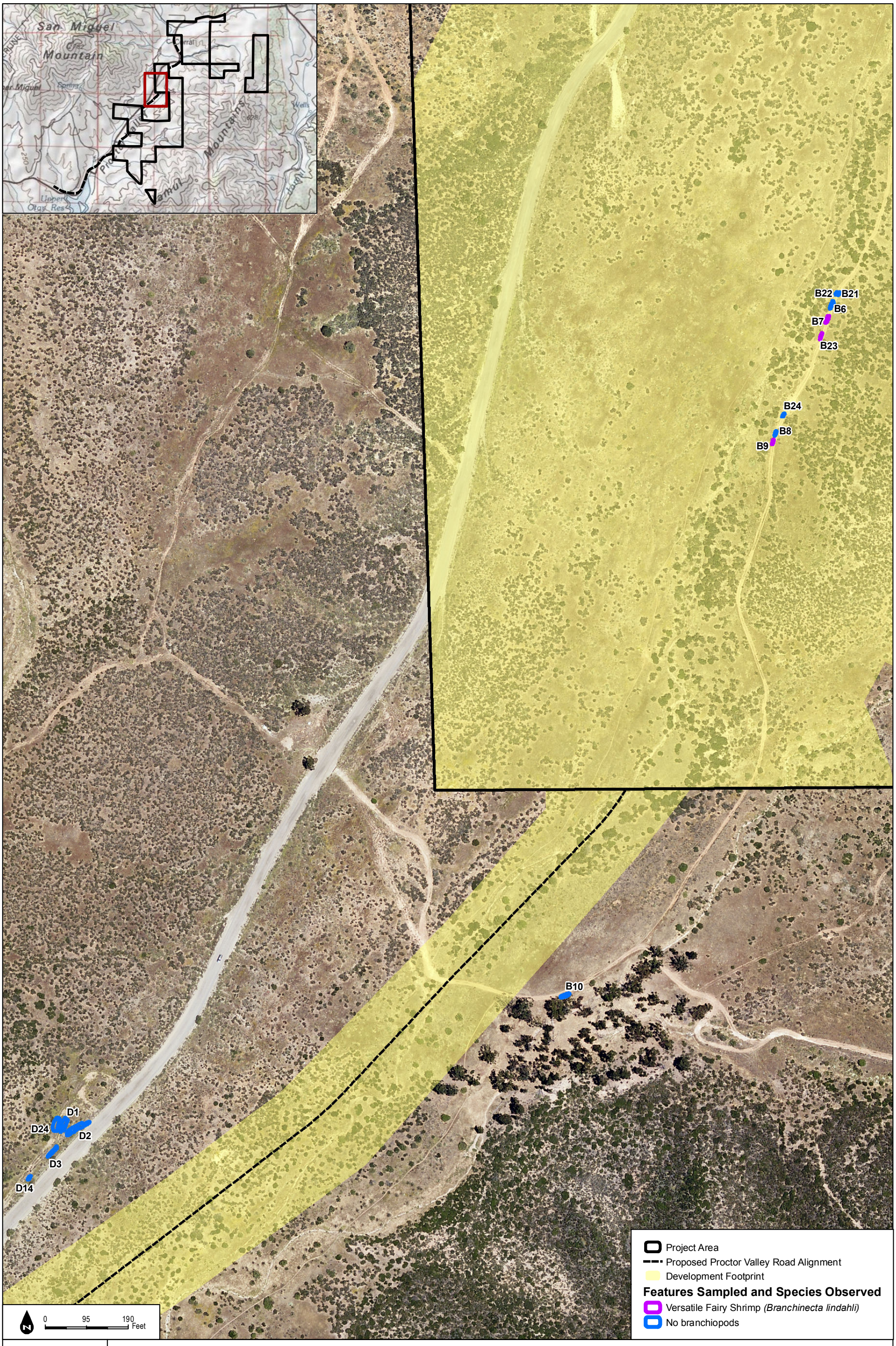
FIGURE 6

Western Spadefoot Survey Area

Summary of Surveys Conducted within the Dispute Resolution Parcels

Attachment B

Figures from the Final EIR for the Approved Project



DUDEK

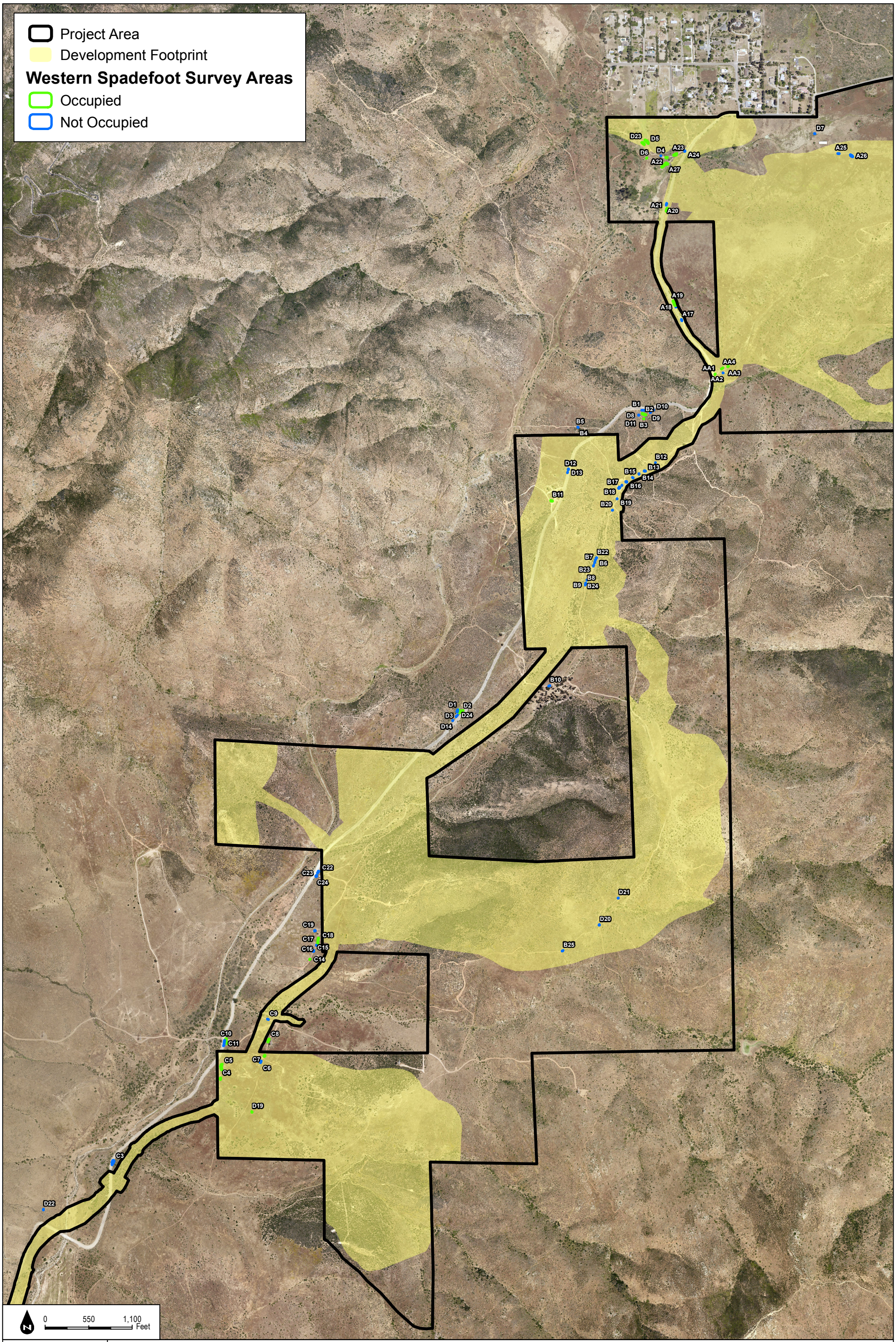
SOURCE: NAIP 2016; Hunsaker 2017

Figure 2.4-8e

Fairy Shrimp Survey Area and Results

Otay Ranch Village 14 and Planning Areas 16/19

NOTE: Survey areas may include additional acreage outside of the Project Area



SOURCE: NAIP 2016; Hunsaker 2017

DUDEK

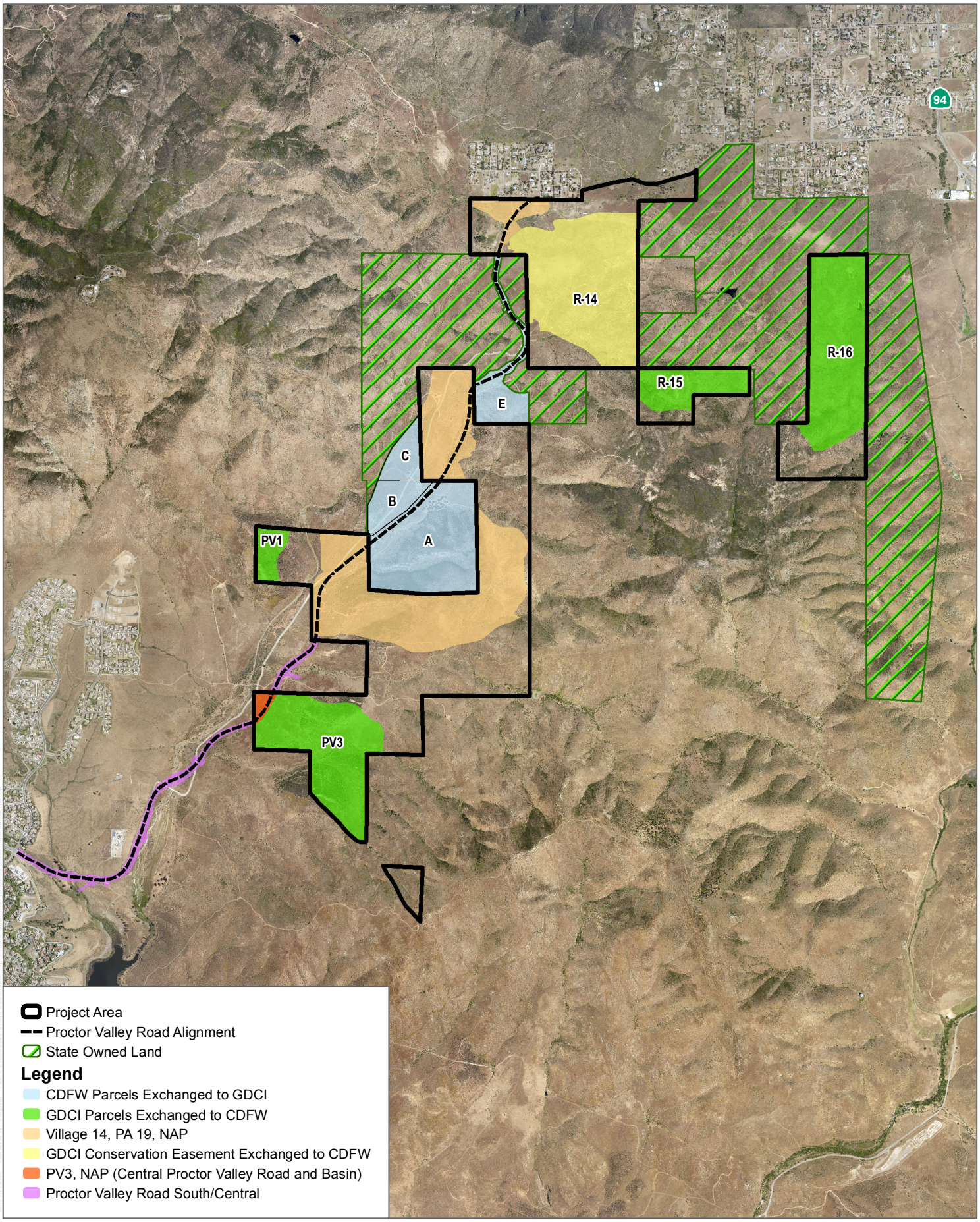
FIGURE 2.4-9

Western Spadefoot Survey Areas

Otay Ranch Village 14 and Planning Areas 16/19

Attachment C

Dispute Resolution Land Map - State Owned Land



SOURCE: SANGIS 2017; Hunsaker 2019

DUDEK

0 1,500 3,000 Feet

Dispute Resolution Land Map - State Owned Land

Otay Ranch Village 14 and Planning Areas 16/19