THE CITY OF SAN DIEGO

ADDENDUM

Project No. 1111415
Addendum to EIR No. 30330/304032
SCH No. 2004051076

SUBJECT: **THE COLLECTION AT CACTUS**: VESTING TENTATIVE MAP (VTM), SITE DEVELOPMENT PERMIT (SDP), and NEIGHBORHOOD DEVELOPMENT PERMIT (NDP) for the approval of a total of 985 multi-family residential units on a 38.8-acre site. The 985 units would be located within the Central Village Specific Plan (CVSP) Planning Area of the Otay Mesa Community Plan, including 139 units in Planning Area (PA) 10, 324 units in PA 11, 348 units in PA 12, and 174 units in PA 13. Additionally, the project would allow for the development of 20,949 sf in leasing/amenity space across PAs 11, 12, and 13, two detention basins, and associated utilities and improvements. The project would also provide approximately 3.5 net acres (3.62 gross acres) in PA 17 for the construction of a future park.

The project would include improvements to Cactus Road, Continental Street, and Airway Road, as well as the construction of internal roadways. Specifically, improvements to Cactus Road would include 30 to 35 feet of dedication to achieve a total right-of-way (ROW) of 70 to 75 feet, construction of a 12-foot-wide parkway with a 6-foot wide non-contiguous sidewalk, a buffered Class II bike lane on the west side of Cactus Road and a striped median along the project's frontage on Cactus Road. Improvements to Cactus Road also include undergrounding of existing powerlines and power poles along the western property line of the project site. Improvements to Airway Road would include 43 to 70 feet of dedication to achieve a total ROW of 84.3 to 100 feet, construction of a 14-foot-wide parkway with a 6-foot-wide non-contiguous sidewalk, and a buffered Class II bike lane on the north side only along the project's frontage. Improvements to Continental Street would include 43 feet of dedication to achieve a total ROW of 85 feet, construction of a 12-foot wide parkway with a 6-foot wide non-contiguous sidewalk on the west side of Continental Street along the project frontage, and a Class II bike lane on both sides of Continental Street. Additionally, the project would include the construction of a water line, sewer gravity line, and sewer force main within the Cactus Road ROW and 2,400 lateral feet of 24-inch sewer gravity line and sewer force main within the Otay Mesa Road ROW.

The 38.8-acre site is located at 7020 Airway Road and is designated as Multiple Use, Park, Open Space, and Recreation in the General Plan and as Community Village and Parks in the Otay Mesa Community Plan. The site is zoned Residential (RM-2-5 and RM-3-7),

Agricultural (AR-1-1) and Commercial (CC-3-6). Additionally, the project site is located within the Airport Land Use Compatibility Overlay Zone (Brown Field), the Airport Influence Area (Brown Field Area 1), the Federal Aviation Administration Part 77 Noticing Area (Brown Field), the Airport Safety Zone (Brown Field – Zone 6), the Very High Fire Hazard Severity Zone and the Transit Priority Area. APPLICANT: JPI Real Estate Acquisition II, LLC.

I. SUMMARY OF ORIGINAL PROJECT

The City of San Diego General Plan provides the Citywide vision for growth and a comprehensive policy framework to implement that vision. The City's General Plan Land Use Element identifies 55 Community Plans (including the Otay Mesa Community Plan), which provide community-scale policy recommendations for specific geographic areas of the City. The Land Use Element identifies the City of Villages strategy as the implementing tool to guide the City's growth within the context of the community planning program. This strategy aims to create mixed-use villages throughout the City, connected by high-quality transit.

The Otay Mesa Community Plan Update (OMCPU) was adopted in March 2014 and was intended to provide for broad land use themes that seek to establish a bi-national center; provide for economic diversification; enhance and sustain Otay Mesa's industrial capacity; encourage and support international trade; promote the establishment of balanced neighborhoods that integrate a mix of land uses; and identify infrastructure needs. Figure 1, *Regional Map*, depicts the location of the Otay Mesa community in relation to the surrounding region.

The OMCPU established five distinct districts covering specific geographic areas within the Otay Mesa community. The OMCPU describes the Central District as having a village center at the western end of the mesa (i.e., the "Central Village" area) that is predominantly residential, with core areas of mixed use and public spaces sited along Airway Road. OMCPU Subsection 2.1, Specific Plan Areas, requires the adoption of a specific plan (the Central Village Specific Plan [CVSP]) to provide for the systematic implementation of the CVSP area in accordance with the vision, goals, and policies of the OMCPU for the Central Village area. In April 2017, the City of San Diego adopted the CVSP to provide for the systematic implementation of the CVSP area in accordance with the vision, goals, and policies of the OMCPU for the Central Village area. Concurrent with the adoption of the CVSP, the City also adopted an Addendum to the OMCPU Project Program Environmental Impact Report (PEIR).

The CVSP establishes land use designations within the Central Village Community. Figure 2, *Land Use Plan*, depicts the portions of the CVSP that would be encompassed by the project. As shown in Figure 2, the CVSP designates Planning Area (PA) 10 as Medium-High Density Mixed Use, PA 11 and PA 12 as Medium Density Multi-Family, PA 13 as Medium-High Density Multi-Family, and PA 17 as Park land uses.

II. SUMMARY OF PROPOSED PROJECT

The project proposes a Vesting Tentative Map (VTM) (VTM No. 3273796), Neighborhood Development Permit (NDP) (PMT-3273795), and a Site Development Permit (SDP) (PMT-3398899) for a 38.8-acre site located within the Central Village Specific Plan (CVSP) in the Otay Mesa area of the City of San Diego.

Figure 3, *Vesting Tentative Map No. 3273796*, depicts the proposed VTM. VTM 3273796 would allow for the development of a total of 985 multi-family residential units on the site, including 139 units in PA 11, 348 units in PA 12, 174 units in PA 13 and a public park in PA 17. Additionally, the project would allow for the development of 20,949 sf in leasing/amenity space across PAs 11, 12, and 13, two detention basins, and associated utilities and improvements. The project would also provide approximately 3.5 net acres (3.62 gross acres) in PA 17 for the construction of a future park.

The base density of each PA is 242 units for PA 10, 244 units for PA 11, 258 units for PA 12, and 285 units for PA 13. Pursuant to State Density Bonus law, in exchange for reserving 10% of the PA 11 and 12 base dwelling units (51 units) for "Very Low" Income households, the project is entitled to a 32.5% density bonus (164 units), two incentives, and unlimited waivers. The project is also reserving 10% of the PA 11 and 12 dwelling units (32 units) for "Low" income households, entitling the project to a 20% density bonus, one incentive, and unlimited waivers. The Very Low-income and Low-income units would be located in PA 11 and PA 12. The project's requested waivers are shown in Table 1, *Requested Waivers*.

The project proposes grading approximately 38.8 acres, including disturbance to the project site and associated grading for off-site roadway improvements. Grading would require 17,550 cubic yards (cy) of cut to a maximum depth of four feet and 60,475 cy of fill to a maximum depth of five feet, requiring 42,925 cy of import. It should be noted that grading activities and development would avoid the drainage area in the northwest corner of the project site.

Access to the project would be provided via Airway Road, Cactus Road, Continental Street, proposed Street D, and proposed Park Way. The project would connect to existing utilities within Airway Road, Continental Street, and Cactus Road. The project would include appropriate improvements to Airway Road, Cactus Road, and Continental Street, as well as the construction of several roadways for internal circulation. Specifically, improvements to Cactus Road would include 30 to 35 feet of dedication to achieve a total right-of-way (ROW) of 70 to 75 feet, construction of a 12-foot-wide parkway with a 6-foot-wide non-contiguous sidewalk, a buffered Class II bike lane on the west side of Cactus Road and a striped median along the project's frontage on Cactus Road. Improvements to Cactus Road also include undergrounding of existing powerlines and power poles along the western property line of the project site. Improvements to Airway Road would include 43 to 70 feet of dedication to achieve a total ROW of 84.3 to 100 feet, with a 14-foot wide parkway with a 6-foot wide non-contiguous sidewalk, and a buffered Class II bike lane on the north side only along the project's frontage. Improvements to Continental Street would include 43 feet

Table 1 Requested Waivers

PLANNING AREA 10 REQUESTED WAIVERS		
CODE SECTION(S)	REQUIREMENT	PROPOSED
SDMC 131.0540(c)(1)	GROUND FLOOR RESTRICTIONS - RESIDENTIAL USE AND RESIDENTIAL PARKING ARE PROHIBITED ON THE GROUND FLOOR IN THE FRONT 30 FEET OF THE LOT	NO COMMERCIAL SPACE PROPOSED
SDMC 131.0552, SDMC 131.0554	TRANSPARENCY AND BUILDING ARTICULATION REQUIREMENTS OF BASE ZONE CC 3-5	PROPOSED UNIT DESIGN TRANSPARENCY VARIES PER BUILDING PER FRONTAGE TYPE. BUILDING ARTICULATION IS BASED ON CVSP POLICY 2.5-54.
CVSP 3.4.3	PRIVATE EXTERIOR OPEN SPACE - MIN. 50 SF OF PRIVATE EXTERIOR OPEN SPACE PER DU WITH A MIN. DIMENSION OF 4 FT	±8,288 SF OF PRIVATE EXTERIOR OPEN SPACE PROPOSED IN THE FORM OF BALCONIES/PATIOS IN TOWNHOME UNITS 1, 2, 3, 4, 5, AND 6
SDMC 142.0525	MOTORCYCLE PARKING - 0.1 SPACE PER DU; 14 SPACES REQUIRED	0 SPACES PROPOSED
SDMC 142.1010(a)	LOADING AREA REQUIREMENTS PER TABLE 142-10B; 2 LOADING SPACES REQUIRED	NO LOADING AREA PROPOSED
SDMC 142.0403	REMAINING YARD LANDSCAPE REQUIREMENTS	REMAINING YARD AREA DEFICIENCIES FOR BUILDINGS 3,8, AND 11.

PLANNING AREA 11 REQUESTED WAIVERS		
CODE SECTION(S)	REQUIREMENT	PROPOSED
CVSP 3.4.3	PRIVATE STORAGE REQUIREMENTS - 240 CUBIC FT PER DU	308 OF THE PROPOSED UNITS WILL INCLUDE ENCLOSED PERSONAL STORAGE CLOSETS LOCATED ON DECKS/PATIOS AT AN AVG. SIZE OF 82 CU FT. 118 OF PROPOSED UNITS WILL HAVE ACCESS TO A PERSONAL GARAGE WHICH TENANT CAN UTILIZE FOR ADDITIONAL STORAGE.
CVSP 3.4.3	MAXIMUM STRUCTURE HEIGHT - 45 FT	PROPOSED MAX. BUILDING HEIGHT OF ±60'-6".
SDMC 142.0525	MOTORCYCLE PARKING - 0.1 SPACE PER DU; 33 SPACES REQUIRED	0 SPACES PROPOSED
SDMC 142-05C	BICYCLE PARKING - 0.4 SPACE/DU FOR 1-BEDROOM UNITS, 0.5 SPACE/DU FOR 2-BEDROOM UNITS, AND 0.6 SPACE/DU FOR 3-4 BEDROOM UNITS; 86 SPACES REQUIRED	5 SPACES PROPOSED
SDMC 142.1010(a)	LOADING AREA REQUIREMENTS PER TABLE 142-10B; 2 LOADING SPACES REQUIRED	NO LOADING AREA PROPOSED

PLANNING AREA 12 REQUESTED WAIVERS		
CODE SECTION(S)	REQUIREMENT	PROPOSED
CVSP 3.4.3	PRIVATE STORAGE REQUIREMENTS - 240 CUBIC FT PER DU	340 OF PROPOSED UNITS WILL INCLUDE ENCLOSED PERSONAL STORAGE CLOSETS LOCATED ON DECKS/PATIOS AT AN AVG. SIZE OF 82 CU FT. 132 OF PROPOSED UNITS WILL HAVE ACCESS TO A PERSONAL GARAGE WHICH TENANT CAN UTILIZE FOR ADDITIONAL STORAGE.
CVSP 3.4.3	MAXIMUM STRUCTURE HEIGHT - 45 FT	PROPOSED MAXIMUM BUILDING HEIGHT OF ±57'-1"
SDMC 142.0525	MOTORCYCLE PARKING - 0.1 SPACE PER DU; 35 SPACES REQUIRED	6 SPACES PROPOSED
SDMC 142.0560(b)	OFF-STREET PARKING SPACE PARALLEL TO AISLE (INTERIOR SPACE) MINIMUM DIMENSION 8' WIDE X 21' LONG	7' WIDE X 21' LONG PARALLEL PARKING SPACES WITH A 24' WIDE DRIVE AISLE
SDMC 142-05C	BICYCLE PARKING - 0.4 SPACE/DU FOR 1-BEDROOM UNITS, 0.5 SPACE/DU FOR 2-BEDROOM UNITS, AND 0.6 SPACE/DU FOR 3-4 BEDROOM UNITS; 93 SPACES REQUIRED	5 SPACES PROPOSED
SDMC 142.1010(a)	LOADING AREA REQUIREMENTS PER TABLE 142-10B; 2 LOADING SPACES REQUIRED	NO LOADING AREA PROPOSED

PLANNING AREA 13 REQUESTED WAIVERS		
CODE SECTION(S)	REQUIREMENT	PROPOSED
CVSP 3.4.3	MINIMUM STREET SIDE SETBACK - 10 FT	BUILDING 20 ALONG STREET D EXTENDS WITHIN 1'-4" OF THE PROPERTY LINE AT THE CLOSEST POINT
CVSP 3.4.3	PRIVATE EXTERIOR OPEN SPACE - MIN. 50 SF OF PRIVATE EXTERIOR OPEN SPACE PER DU WITH A MIN. DIMENSION OF 4 FT	±13,346 SF OF PRIVATE EXTERIOR OPEN SPACE PROPOSED IN THE FORM OF BALCONIES/PATIOS IN TOWNHOME UNITS 1, 2, 3, 4, 5, AND 6
SDMC 142.0525	MOTORCYCLE PARKING - 0.1 SPACE PER DU; 18 SPACES REQUIRED	0 SPACES PROPOSED
SDMC 142.1010(a)	LOADING AREA REQUIREMENTS PER TABLE 142-10B; 2 LOADING SPACES REQUIRED	NO LOADING AREA PROPOSED
SDMC 142.0403	REMAINING YARD LANDSCAPE REQUIREMENTS	REMAINING YARD AREA DEFICIENCIES FOR BUILDINGS 3,9, 10, 14, 15, 21, AND 22.

of dedication to achieve a total ROW of 85 feet, with a 12-foot wide parkway with a 6-foot wide non-contiguous sidewalk on the west side of Continental Street along the project frontage, and a Class II bike lane on both sides of Continental Street. Additionally, the project would include the construction of a water line, sewer gravity line, and sewer force main within the Cactus Road ROW and 2,400 lateral feet of 24-inch sewer gravity line and sewer force main within the Otay Mesa Road ROW. The project includes the construction of Street D, running east to west through the central portion of the project site and connecting with Cactus Road and Continental Street. Additionally, the project involves the construction of Park Way (public, running north to south and connecting with Airway Road and proposed Street D.

III. ENVIRONMENTAL SETTING

The environmental setting of the project site is substantially the same as described in the OMCPU PEIR (State Clearinghouse [SCH] No. 2004051076). Figure 4, *Aerial Photograph*, depicts the existing conditions of the 38.8-acre site. Based on historical aerial photographs, the project site was utilized historically as agricultural land from at least 1949 to 1996. Under existing conditions, the project site is vacant and includes disturbed wetland and disturbed land vegetation communities, consistent with conditions that existed at the time the OMCPU was adopted. (Hillmann, 2023a; Alden Environmental, 2025)

As shown in Figure 5, *Vicinity Map*, the project site is located in the southern portion of the City of San Diego, within the Otay Mesa area. Land uses to the north of the project site include SR-905 immediately to the north and industrial land uses. Land uses to the east of the site include mixed-use, industrial, and residential. Land uses to the south of the site include industrial land uses. Land uses to the west include mixed-use, industrial, and open space. Land to the west and southwest of the project site is planned for mixed-use under the CVSP.

IV. ENVIRONMENTAL DETERMINATION

The City previously prepared and certified the OMCPU PEIR SCH No. 2004051076 per Resolution No. R-30881 on March 11, 2014. Based on all available information in light of the entire record, the analysis in this Addendum, and pursuant to Sections 15162 and 15164 of the State CEQA Guidelines, the City has determined the following:

- There are no substantial changes proposed in the project which will require major revisions of the previous environmental document due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;

- Substantial changes have not occurred with respect to the circumstances under which the project is undertaken which will require major revisions of the previous environmental document due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or

- There is no new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous environmental document was certified as complete or was adopted, shows any of the following:

    a. The project will have one or more significant effects not discussed in the previous environmental document;

    b. Significant effects previously examined will be substantially more severe than shown in the previous environmental document;

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

d. Mitigation measures or alternatives which are considerably different from those analyzed in the previous environmental would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

Based upon a review of the current project, none of the situations described in Sections 15162 and 15164 of the State CEQA Guidelines apply. No changes in circumstances have occurred, and no new information of substantial importance has manifested, which would result in new significant or substantially increased adverse impacts as a result of the project. Therefore, this Addendum has been prepared in accordance with Section 15164 of the CEQA State Guidelines. Public review of this Addendum is not required per CEQA.

V. IMPACT ANALYSIS

This Addendum includes a subsequent impact analysis to demonstrate that the environmental impacts associated with the project are consistent with, or less than, the impacts disclosed in the previously certified 2014 OMCPU PEIR. The following includes the environmental issues analyzed in detail in the 2014 OMCPU PEIR, as well as the project-specific analysis pursuant to CEQA. The analysis in this document evaluates the adequacy of the 2014 OMCPU PEIR relative to the project. The following analysis documents that the proposed modifications and/or refinements would not cause new or more severe significant impacts than those identified in the 2014 OMCPU PEIR.

The OMCPU EIR identified significant impacts related to land use, air quality/odor, biological resources, historical resources, human health/public safety/hazardous materials, hydrology/water quality, geology/soils, noise, paleontological resources, transportation/circulation, public utilities, and greenhouse gas emissions. All impacts would be mitigated to below a level of significance except air quality, greenhouse gas (GHG) emissions, noise, transportation/circulation, and utilities.

Table 2 Impact Assessment Summary

Environmental Issues	OMCPU PEIR Finding	OMCP Mitigation	Project	Project Level New Mitigation?	Project Impact
Land Use	Significant but mitigated	Yes	No new impacts	No	Less than significant
Visual Effects and Neighborhood Character	Less than significant	No	No new impacts	No	Less than significant
Air Quality/Odor	Significant, unmitigated	Yes	No new impacts	Yes	Mitigated to a Level Less than significant
Biological Resources	Significant but mitigated	Yes	No new impacts	No	Less than significant
Historical Resources	Significant but mitigated	Yes	No new impacts	Yes	Mitigated to a Level Less than significant
Human Health/Public Safety/Hazardous Materials	Significant but mitigated	Yes	No new impacts	No	Less than significant
Hydrology/Water Quality	Significant but mitigated	Yes	No new impacts	No	Less than significant
Geology/Soils	Significant but mitigated	Yes	No new impacts	No	Less than significant
Energy Conservation	Less than significant	No	No new impacts	No	Less than significant
Noise	Significant, unmitigated	Yes	No new impacts	No	Less than significant
Paleontological Resources	Significant but mitigated	Yes	No new impacts	No	Less than significant
Traffic/Circulation	Significant, unmitigated	Yes	No new impacts	Yes	Impacts would remain significant and unavoidable
Public Services	Less than significant	No	No new impacts	No	Less than significant
Utilities	Significant, unmitigated	Yes	No new impacts	No	Less than significant
Water Supply	Less than significant	No	No new impacts	No	Less than significant
Population and Housing	Less than significant	No	No new impacts	No	Less than significant

Agricultural and Mineral Resources	Less than significant	No	No new impacts	No	Less than significant
Greenhouse Gas Emissions	Significant, unmitigated	Yes	No new impacts	No	Less than significant

LAND USE

2014 OMCPU PEIR

Land Use Plan Conflict

Land Use is discussed in Section 5.1 of the OMCPU PEIR. The OMCPU PEIR found that the OMCPU's goals, policies, and programs are consistent with the land use plans, policies, and regulations of the City's General Plan; Land Development Code; Brown Field Airport Land Use Compatibility Plan; and the San Diego Association of Governments' (SANDAG) Regional Comprehensive Plan. Accordingly, the OMCPU PEIR concluded that the OMCPU would have a less-than-significant impact due to conflicts with other planning documents and no mitigation would be required.

Land Use Compatibility

The OMCPU PEIR found that the OMCPU's land use plan would locate residential land uses near industrial uses, potentially resulting in impacts associated with the collocation of incompatible land uses. The OMCPU PEIR anticipated that the CVSP would incorporate transitional land uses, such as commercial uses, landscaping, parking, and setbacks, in the interface area, and that the residential uses would then be separated from industrial uses. Additionally, the OMCPU PEIR noted that the Otay Mesa CPIOZ would apply to the areas designated for industrial uses. The CPIOZ would ensure consistency of all future development within these areas with CPU direction and policy, including future ministerial projects. Moreover, the OMCPU PEIR found that various policies within the OMCPU would help limit incompatibilities at the interface between residential and industrial uses, thereby promoting both a desirable residential community and opportunities for continued industrial development. Consistent with the General Plan Economic Prosperity Element and its Residential and Industrial Collocation and Conversion Policies, the OMCPU PEIR found that the OMCPU would minimize land use conflicts and preserve the most important types of industrial land within the OMCPU area. The OMCPU PEIR concluded that, with the implementation of OMCPU policies and performance standards, potential impacts associated with the collocation of incompatible land uses would be reduced to less-than-significant levels.

Regulatory Consistency

The Land Use Section of the OMCPU PEIR found that implementation of the OMCPU would not conflict with the intent and purpose of the Brush Management regulations of the LDC; however, the OMCPU PEIR found that the OMCPU would have the potential to conflict with the intent and purpose of the ESL regulations and the Historical Resources regulations. With implementation of Mitigation Frameworks LU-1a and LU-1b, which generally require development proposals to be consistent with the OMCPU, base zone regulations, and CPIOZ Type A supplemental regulations, and require future implementing developments to demonstrate that there are no biological or archeological resources present on the project site, the OMCPU PEIR concluded that potentially significant impacts due to conflicts with the ESL and Historical Resources regulations would be reduced to below a level of significance.

Environmental Plan Consistency

The OMCPU PEIR included an analysis of potential impacts due to a conflict with the City's Multiple Species Conservation Program (MSCP) Subarea Plan in OMCPU PEIR Subsection 5.1, Land Use. As stated in the OMCPU PEIR, future development in the OMCPU area may require adjustment(s) to the Multi-Habitat Planning Area (MHPA) boundary; however, potential impacts to the MHPA preserve configuration as a result of MHPA boundary adjustments were found to be less than significant because any such adjustment must meet the required MHPA boundary line equivalency criteria and would be subject to approval from the Wildlife Agencies (i.e. the United State Fish and Wildlife Service and the California Department of Fish and Wildlife). Additionally, the OMCPU PEIR found that potential indirect impacts would be evaluated at the project-level for consistency with the MHPA Land Use Adjacency Guidelines. The OMCPU PEIR found that although implementation of the OMCPU would introduce land uses adjacent to MHPA which would potentially result in a significant impact, compliance with established development standards and other applicable regulations contained in the OMCPU as well as the MSCP Subarea Plan's Land Use Adjacency Guidelines, MSCP Management Policies and Directives, and Area Specific Management Directives were found to reduce impacts to below a level of significance. Additionally, impacts due to a conflict with the MHPA Land Use Adjacency Guidelines were determined to be less than significant with implementation of Mitigation Framework LU-2.

Collection at Cactus Project

Land Use Plan Conflict

The project is located within the boundary of the OMCP and the CVSP. The CVSP designates PA 10 as Medium-High Density Mixed Use, PA 11 and PA 12 as Medium Density Multi-Family, PA 13 as Medium-High Multi-Family, and PA 17 as Parkland. PA 10 is zoned CC-3-6, PA 11 and PA 12 are zoned RM-2-5, PA 13 is zoned RM-3-7, and PA 17 is zoned AR-1-1. The proposed residential and recreation land uses would be consistent with the land use designations and zoning. The project would be consistent with all applicable policy documents with jurisdiction over the project.

Furthermore, the project would be consistent with the City's Climate Action Plan (CAP), which is applicable to the project area. Please refer to the discussion of thresholds under the Greenhouse Gas Emissions Subsection of this document for a more detailed analysis of the project's consistency with the City of San Diego CAP.

Land Use Compatibility

The project would be developed with residential and recreation land uses in accordance with the CVSP. The project would locate residential land uses in close proximity to off-site light industrial land uses to the south and west. Future residential land uses associated with the project would be physically separated from light industrial uses to the west by Cactus Road and intervening existing and planned future residential uses and to the south by Airway Road. Additionally, development associated with the project would be required to comply with CVSP policies and design standards adopted to reduce potential impacts from the collocation of residential and industrial land uses, including landscape screening and setbacks.

The project includes an NDP, which was reviewed for conformance with all applicable policies and design standards of the OMCPU and CVSP. Consistent with the findings of the OMCPU PEIR, mandatory compliance with the OMCPU and CVSP design standards and policies would ensure that the residential uses proposed by the project are compatible with surrounding industrial land uses. Therefore, implementation of the project would not result in land use incompatibilities as a result of the collocation of residential and industrial land uses.

Regulatory Consistency

Implementation of the project would result in on-site development consistent with the OMCPU and CVSP. Under existing conditions, the project site is undeveloped and does not contain structures that would be considered significant under Historic Resources Board (HRB) criteria.t The project site contains two previously recorded archaeological sites (CA-SDI-7208 and CA-SDI-11,424). As described in the discussion of potential impacts to archaeological resources below, implementation of MM-HIST-1 Data Recovery and MM-HIST-2 Archaeological Monitoring, as detailed in the project's Mitigation Monitoring Reporting Program (MMRP; Section VIII), would reduce impacts to a level less than significant. Therefore, the project would not conflict with the purpose or intent of the Historical Resources Regulations.

The northwest corner of the project site contains a constructed drainage channel that supports disturbed wetland which is considered ESL. However, the project is designed to avoid this potential wetland. Therefore, the project would be consistent with the City's ESL Regulations.

The project site is not located within or adjacent to the City of San Diego's Multiple Species Conservation Program (MSCP) MHPA. Therefore, the project would not result in a conflict with the MSCP Subarea Plan and the MHPA.

Environmental Plan Consistency

As described in the discussion of potential impacts to biological resources below, the Mitigation Framework BIO-1 and BIO-2, which require future projects to prepare a site-specific biological resources report, were implemented. The project site is not within or immediately adjacent to the MHPA. No impact related to the consistency of the biological resources environmental plan would occur.

Land Use Impacts Conclusion

The OMCPU PEIR identified potentially significant impacts related to land use and identified Mitigation Framework LU-1a, LU-1b, and LU-2. In accordance with Mitigation Framework LU-1a and LU-1b, the project is subject to discretionary review. The project is not adjacent to the MHPA; thus, Mitigation Framework LU-2 does not apply to the project.

Based on the foregoing analysis and information, the project is within the scope of the analysis of the 2014 OMCPU PEIR. Thus, implementation of the project would not require a major revision to the PEIR, nor result in any new significant impacts or increase the severity of a previously identified significant impact as analyzed and described in the 2014 OMCPU PEIR.

VISUAL EFFECTS AND NEIGHBORHOOD CHARACTER

2014 OMCPU PEIR

Public Views

Section 5.2 of the OMCPU PEIR found that there were no scenic vistas or scenic viewing areas identified by the previously adopted Otay Mesa Community Plan or the City's General Plan for the OMCPU area. Additionally, the OMCPU PEIR found that implementation of the OMCPU would preserve a majority of the existing public views of canyons and mesas. In addition, the OMCPU PEIR found that the OMCPU requires the establishment of view corridors and gateways to protect views of public resources. The OMCPU PEIR found that the OMPCU would not result in significant impacts to scenic resources. As such, the OMCPU PEIR concluded that impacts to the visual quality of the area, with respect to views from public viewing areas, vista, and open spaces, would be less than significant.

Compatibility

The OMCPU PEIR found that the existing undeveloped parcels and scattered industrial, commercial, and rural residences along the SR-905 corridor (i.e., within the Central District) would transition over the next 30 years to a more urbanized, cohesive land use arrangement. The visual character of the Central District was described as transitioning from existing low-rise, single-use structures and blocks to vertically and horizontally mixed-use structures and blocks. Under the OMCPU, the resulting building mass, scale, and heights were found to be characteristic of medium-high-density mixed-use and transit-focused development, with building heights ranging from three to four stories to a maximum of six stories. The OMCPU PEIR also found that mandatory compliance with applicable regulatory requirements that implement the goals and policies of the General Plan and OMCPU would ensure that impacts to the visual character and quality of the Central Village and surrounding areas would be less than significant. Furthermore, the OMCPU PEIR concluded that the Central District is already developed with industrial and agricultural uses. Therefore, the proposed intensification of uses within the Central District (including the Central Village) is not considered a significant change to the aesthetic character in the Central District and would be compatible with the surrounding development in terms of bulk, scale, materials, and style. The impacts were determined to be less than significant, requiring no mitigation.

Landform Alteration

The OMCPU PEIR found that the existing undeveloped parcels and scattered industrial, commercial, and rural residences along the SR-905 corridor (i.e., within the Central District) would transition over the next 30 years to a more urbanized, cohesive land use arrangement. The OMCPU PEIR noted that the General Plan Land Use, Urban Design, and Mobility Elements contain relevant citywide policies to address land-use compatibility, and that future projects would be required to comply with these policies. The OMCPU PEIR noted that specific grading quantities associated with future development were unknown; however, the OMCPU PEIR determined that significant impacts would occur due to substantial changes to natural landforms and/or ground relief features if one of the following conditions is met. The first condition relates to ESL Regulations and Steep Hillside Guidelines, while the remaining conditions address grading manufactured slopes taller than 10 feet and fill slopes exceeding 5 feet in height. The OMCPU PEIR also noted that per the City's Significant Determination

Thresholds, grading impacts would not be considered significant if certain conditions applied. The OMCPU PEIR found that all future development proposals in the OMCPU area would be reviewed to determine if the grading plans demonstrated compliance with the grading criteria in the OMCPU PEIR, or if alternative design features would be required. Furthermore, the OMCPU PEIR found that mandatory compliance with applicable regulatory requirements and OMCPU Policies would ensure that impacts associated with changes to natural topography would be less than significant and would require no mitigation.

The OMCPU PEIR found that future development would be required to comply with the City's Grading Regulations, General Plan policies, and OMCPU policies. As such, the OMCPU PEIR concluded that, assuming compliance with these policies, impacts associated with modifications to unique physical features that would create a negative visual appearance would be less than significant.

Collection at Cactus Project

Public Views

The project consists of VTM No. 3273796, NDP No. 3273795, and SDP No. 3398899 to implement a portion of the CVSP with the development of 985 multi-family residential units. The project would not impact any off-site public viewing areas, vistas, or open spaces. The project does not contain scenic resources and is not located in an area designated as a scenic vista or viewshed by either the City of San Diego General Plan or the CVSP. The project includes requested waivers for maximum building height in PA 11 and PA 12 and minimum setback requirements in PA 13. While approval of these waivers would allow for increased building height from 45 feet to 60 feet 6 inches in PA 11 and 45 feet to 57 feet 1 inch in PA 12 and minimum side yard setback of 10 feet to 1 foot 4 inches in one location in PA 13, the project site is not located in an area where the project could impact scenic vistas or viewsheds. The building heights proposed by the project would not obstruct public views, and views of the surrounding area would remain accessible from areas around the project site. Therefore, the project would not result in a substantial obstruction of a vista or scenic view from a public viewing area. No impact on the area's visual quality would occur. The project site is not located near any State-designated scenic highways.

Additionally, the project site is not adjacent to any gateway or view corridor opportunities as indicated in the OMCPU. As part of its review of the NDP, the City ensured that all project design elements complied with the CVSP's design standards and policies, including those related to open space connections and view corridors, architectural design, and landscape design. Mandatory compliance with the CVSP's policies and requirements would ensure that on-site development does not affect the area's visual quality.

Compatibility

The project does not propose any changes to the site's existing land use as applied to the site by the CVSP. The CVSP designates the project site for Medium-High Density Mixed Use, Medium Density Multi-Family, Medium-High Multi-Family, and Park land uses. The project would be consistent with all applicable design elements and comply with applicable design standards and policies, including those related to open space connections and view corridors, architectural design, and landscape

design. The project's proposed land uses would be consistent with those evaluated under the OMCPU PEIR and as amended by the CVSP. Additionally, the project would be required to comply with applicable regulatory requirements that implement General Plan goals and policies, as well as with the CVSP. As part of the City's discretionary review process, each application would be reviewed for compliance with the General Plan as well as the policies contained in the OMCPU and CVSP.

The project site is surrounded by residential land uses to the east, undeveloped land to the south, undeveloped land and commercial storage land uses to the west, and SR-905, industrial, and commercial uses to the north. The project would not result in land uses that would be incompatible with surrounding development. Therefore, adverse aesthetic impacts would not result from the project.

Landform Alteration

Under existing conditions, the project site is characterized by relatively flat terrain, ranging from 494 to 515 feet above mean sea level (amsl). The project would include grading of approximately 38.8 acres of the 38.8-acre site. Grading would require 17,550 cubic yards (cy) of cut to a maximum depth of four feet and 60,475 cy of fill to a maximum depth of five feet, requiring 42, 925 cy of import. While the project could result in a significant change to natural topography or other ground surface relief features, it would be required to comply with the applicable grading ordinances of the City of San Diego, the California Building Code (CBC), and ESL Guidelines. Furthermore, the slopes proposed as part of the project were evaluated in a site-specific Geotechnical Report and Update Letter prepared by Geocon, Inc. (Geocon, 2023, 2024), which are included as *Technical Appendix B1* and *Technical Appendix B2* to this document. The Geotechnical Report evaluates the proposed grading plan and incorporates measures to address slope stability. The project would be required to comply with the recommendations of the Geotechnical Report. Thus, the project would not result in a substantial change to natural topography or other ground surface relief features, and impacts would be less than significant.

A slope analysis of the project site determined that there are no steep hillsides on the site. Additionally, grading proposed by the project would be subject to mandatory compliance with applicable regulations as ensured through the City's NDP review process. Therefore, impacts would be less than significant.

Visual Effects And Neighborhood Character Impacts Conclusion

The OMCPU PEIR determined that impacts related to visual effects and neighborhood character would be less than significant, and no mitigation would be required. Based on the foregoing analysis and information, the project is within the scope of the analysis of the 2014 OMCPU PEIR. Thus, implementation of the project would not require a major revision to the PEIR, nor result in any new significant impacts or increase the severity of a previously identified significant impact as analyzed and described in the 2014 OMCPU PEIR.

AIR QUALITY/ODOR

2014 OMCPU PEIR

Section 5.3 of the OMCPU PEIR provides an analysis of air quality impacts associated with the CPU.

Plan Consistency

The OMCPU PEIR found that implementing the OMCPU land use plan would result in fewer emissions than the adopted community plan, which served as the basis for the current Regional Air Quality Strategy (RAQS) for the San Diego Air Basin (SDAB).

Criteria Pollutants

The OMCPU PEIR concluded that while it is not anticipated that construction activities under the OMCPU would result in significant air quality impacts, impacts were concluded to be significant and unavoidable because air emissions from future implementing development projects within the OMCPU area could not be adequately quantified at the time the OMCPU PEIR was prepared. For operational conditions, the OMCPU PEIR found that the OMCPU would be consistent with adopted regional air quality improvement plans and would result in a decrease in emissions compared to the assumptions used in the RAQS. However, operational air pollutant emission impacts were identified as significant and unavoidable because air pollutant emissions from future developments implementing the OMCPU could not be adequately quantified by the OMCPU PEIR at the policy level. Accordingly, due to potential conflicts with the RAQS and the State Implementation Plan (SIP) during construction and operational activities associated with OMCPU implementation, the impacts were deemed significant and unavoidable. A statement of overriding considerations was adopted for these impacts.

The OMCPU PEIR found that emissions resulting from the implementation of the OMCPU would potentially exceed daily SDAPCD emissions thresholds and result in a cumulatively considerable net increase of criteria pollutants during both construction and long-term operation of implementing development projects. Although the analysis of construction-level impacts demonstrated that impacts would be less than significant, the OMCPU PEIR concluded that impacts would be cumulatively considerable and unavoidable because multiple projects could be under construction simultaneously and thereby cumulatively exceed the SDAPCD construction-related thresholds. Under long-term operating conditions, the OMCPU PEIR determined that air quality emissions would be reduced under the OMCPU compared to the previously adopted community plan, but also concluded that emissions under the OMCPU still would exceed the SDAPCD operational thresholds. Because air emissions from future developments within the OMCPU area could not be adequately quantified at the time the OMCPU PEIR was certified, due to the fact that the OMCPU is a policy document and no specific development was proposed, this impact was disclosed as significant and unavoidable. The OMCPU PEIR identified Mitigation Frameworks AQ-1 and AQ-2, which require the incorporation of best available control measures and reasonable mitigation to reduce emission levels. The OMCPU PEIR concluded that, even with the implementation of Mitigation Frameworks AQ-1 and AQ-2, impacts due to potential violations of air quality standards and a cumulatively significant net increase in criteria pollutants for which the region is in non-attainment would be significant and unavoidable. A statement of overriding considerations was adopted for these impacts.

CO "Hot Spot" Analysis

The OMCPU PEIR found that there were three intersections with a potential for Carbon Monoxide (CO) "Hot Spots": Otay Mesa Road at Innovative Way; Old Otay Mesa Road at Beyer Road; and Otay Valley Road and Heritage Road. The analysis concluded that the CO concentrations at these

intersections would not exceed the ambient air quality standards. Therefore, the OMCPU PEIR concluded that implementing the OMCPU would result in less-than-significant impacts on CO hot spots.

DPM-Related Health Risks

With respect to diesel particulate matter (DPM), the OMCPU PEIR found that acute health risks due to DPM would be less than significant. For long-term carcinogenic risks associated with DPM, the Maximally Exposed Individual Resident (MEIR) average residential incremental cancer risk due to diesel particulates from mobile sources was found to be 2.8 in one million; the 80th percentile residential incremental risk was calculated at 3.1 in one million; and the high-end residential incremental risk was determined to be 4.0 in one million. At the Point of Maximum Impact (PMI) for the Maximally Exposed Individual Worker (MEIW), the incremental cancer risk due to diesel particulates was calculated to be 0.57 per million. This is below the ten in one million threshold commonly applied by agencies in California. For non-carcinogenic risks, the OMCPU PEIR found that the maximum chronic hazard index at any of the modeled receivers is 0.19, which is below the significance threshold of 1.0. As such, the OMCPU PEIR found that DPM impacts affecting sensitive receptors would be less than significant.

Sensitive Receptors and TACs

The OMCPU PEIR evaluated potential impacts to sensitive receptors from stationary sources. The PEIR found that the OMCPU would allow for the establishment of new businesses that have the potential to emit toxic air contaminants (TACs), and imposed a mitigation measure (OMCPU PEIR Mitigation Framework AQ-3) to require compliance with Assembly Bill (AB) 2588 prior to the establishment of any new source of TACs within the OMCPU area. Nonetheless, the OMCPU PEIR concluded that these impacts would be significant and unavoidable.

Collocation

Potential impacts from collocation were also evaluated in the OMCPU PEIR, as the OMCPU would allow residential, commercial, and industrial uses in proximity to one another. Air quality impacts discussed in the OMCPU PEIR include DPM emitted by heavy trucks and diesel engines, chromium emitted by chrome platers, and perchloroethylene emitted by dry cleaning operations. The OMCPU PEIR noted that the OMCPU contains policies and performance standards to prevent or reduce potential impacts associated with the collocation of diverse land uses. While compliance with the OMCPU and General Plan policies, along with local, state, and federal regulations, was found to reduce potential impacts, the OMCPU PEIR concluded that future projects may result in significant impacts due to the introduction of sensitive uses (residential uses, schools, parks) within the buffer distances of the facilities. Although Mitigation Framework AQ-4 would be implemented with future developments in the OMCPU, collocation impacts were identified as significant and unavoidable because it could not be determined in the absence of a detailed evaluation of future implementing development projects whether the proposed mitigation would reduce all impacts to below a level of significance. A statement of overriding considerations was adopted for this impact.

Collection at Cactus Project

Plan Consistency

The State Implementation Plan (SIP) drafted by the California Air Resource Board (CARB) outlines the measures that the State will take to improve air quality and attain the attain the National Ambient Air Quality Standards (NAAQS). The SDAPCD Regional Air Quality Strategy (RAQS) outlines SDAPCD's plans and control measures designed to attain the California Ambient Air Quality Standards (CAAQS), which are generally more stringent than the NAAQS.

The RAQS serves as the Air Quality Management Plan (AQMP) for the SDAB in which the project site is located. As was the case when the OMCPU PEIR was certified, the SDAB is in "non-attainment" status for federal and State ozone (O_3) standards and the State PM_{10} and $PM_{2.5}$ standards.

The RAQS is largely based on population predictions by the San Diego Association of Governments (SANDAG). In the event that a project proposes development that is less dense than anticipated within the General Plan, the project would likewise be inconsistent with the RAQS. If a project proposes development that is greater than that anticipated in the City General Plan and SANDAG's growth projections upon which the RAQS is based, the project could be in conflict with the RAQS and SIP and may have a potentially significant impact on air quality. Also, an individual project would be considered to have a cumulative, considerable impact if its results in emissions that exceed the screening thresholds after the implementation of all feasible mitigation measures.

The maximum residential growth anticipated by the project was accommodated within the growth projected by the OMCPU. Therefore, because the project is consistent with the land use designation for the project site, it would not result in an increase in emissions not already accounted for in the RAQS and would not conflict with the implementation of the RAQS or other portions of the SIP. Accordingly, the project's impacts would not exceed what was previously disclosed and would remain fully within the scope of impacts identified in the OMCPU PEIR. Therefore, impacts due to a conflict with the implementation of the RAQS or other portions of the SIP under the project would be consistent with the impacts identified in the OMCPU PEIR. The project would contribute to, but would not increase, the significant unavoidable impact disclosed by the OMCPU PEIR due to a conflict with the RAQS or other portions of the SIP; thus, the project's impacts are within the scope of analysis of the OMCPU PEIR.

Criteria Pollutants

The OMCPU PEIR found that implementation of the OMCPU would result in emissions that had the potential to contribute substantially to an existing or projected air quality violation, and impacts were found to be significant and unavoidable. However, the project's impacts would be fully within the scope of the impacts identified in the PEIR. Furthermore, due to emissions regulations becoming more stringent and typical turnover of older pieces of construction equipment (older pieces of equipment being replaced with newer and less polluting pieces of equipment over time), project construction air quality emissions may be reduced in comparison to what was evaluated and disclosed by the OMCPU PEIR.

The OPCPU PEIR Identified Mitigation Framework AQ-1, which requires best available control measures and technology to be implemented during construction activities when construction

emissions would exceed applicable thresholds. Because multiple construction projects may be underway simultaneously, the project would be required to implement Mitigation Framework MM-AQ-1, which would require best available control measures/technology to be implemented during construction activities.

Air emissions from daily operations would include sources such as Area, Energy, and Mobile. Source emissions include emissions from consumer products, landscaping maintenance equipment, and architectural coatings (such as painting) as part of regular maintenance activities in a predominantly residential community. Energy source emissions would be generated from the production and consumption of energy to operate the community, such as electricity. Mobile (or transportation-related) source emissions would occur from motor vehicles (tailpipe emissions) generated by land uses in the project area.

The project site would be developed in accordance with CVSP's development standards. The project site would be developed with fewer residential units than what was evaluated by the OMCPU Final PEIR for the project site. Thus, Area Source and Energy Source emissions would be reduced relative to those evaluated in the OMCPU Final PEIR. The project would not result in significant impacts to air quality beyond the scope of the OMCPU PEIR.

CO "Hot Spot" Analysis

An adverse CO concentration, known as a "hot spot," would occur if an exceedance of the state one-hour standard of 20 parts per million (ppm) or the 8-hour standard of 9 ppm were to occur. The proposed project would generate 6,085 trips and would not produce the volume of traffic required to generate a CO "hot spot" either in the context of the 2003 Los Angeles hot spot study or based on representative Bay Area Air Quality Management District (BAAQMD) CO threshold considerations.

Therefore, CO "hot spots" are not an environmental impact of concern for the project. Localized air quality impacts related to mobile-source emissions would therefore be less than significant.

Sensitive Receptors and DPM-Related Health Risks

Sensitive receptors include schools and schoolyards, parks and playgrounds, daycare centers, nursing homes, hospitals, and residential communities. During short-term construction activity, the project would result in some diesel particulate matter DPM which is a listed carcinogen and toxic air contaminant (TAC) in the State of California. Given that the total construction DPM emissions are not of a magnitude and duration that could create substantial concentrations or significant air toxic risks to the nearest sensitive receptors during construction and the annual $PM_{2.5}$ emissions from equipment during each year of construction, any DPM generated from construction activity would result in less than significant ground level concentrations of DPM and not result in a significant health risks and no further evaluation is required. Therefore, the project would not expose sensitive receptors to substantial pollutant concentrations, and impacts would be less than significant.

TACs and Collocation

The project site would not be located in close proximity to off-site commercial or industrial uses. Impacts caused by the existing and future off-site industrial activities would be less than significant.

The project does not have the potential to emit toxic air contaminants. Therefore, OMCPU PEIR Mitigation Framework AQ-3 would not apply. Additionally, the project would not result in significant impacts to sensitive receptors and does not contain a facility identified in Table 5.3-7 of the OMCPU PEIR; therefore, OMCPU PEIR Mitigation Framework AQ-4 would not apply.

Odors

Under existing conditions, no known significant odor generators are located within or near the project site. Odor impacts would not significantly change under the project, and the development area and land uses would be in accordance with the OMCPU PEIR. The land uses proposed do not include any substantial odor-generating uses. Potential odor sources associated with the project may result from construction equipment exhaust and the application of asphalt and architectural coatings during construction activities, and the temporary storage of typical solid waste (refuse) associated with the project's (long-term operational) uses. Standard construction requirements would minimize the impact of construction-related odors. The construction odor emissions would be temporary, short-term, and intermittent, ceasing upon completion of the respective construction phase, and are thus considered less than significant. It is expected that project-generated refuse would be stored in covered containers and removed at regular intervals in compliance with the City's solid waste regulations. The project would also be required to comply with SDAPCD Rule 51 to prevent occurrences of public nuisances. Therefore, odors associated with the project construction and operations would be less than significant.

Air Quality Impacts Conclusion

Based on the foregoing analysis and information, the project is within the scope of the analysis of the 2014 OMCPU PEIR. Thus, implementation of the project would not require a major revision to the PEIR, nor result in any new significant impacts or increase the severity of a previously identified significant impact as analyzed and described in the 2014 OMCPU PEIR.

BIOLOGICAL RESOURCES

2014 OMCPU PEIR

Section 5.4 of the OMCPU PEIR provides an analysis of biological resource impacts associated with the OMCP.

Sensitive Plants, Animals and Habitat

The OMCPU PEIR found that implementation of the OMCPU could directly impact sensitive plants and animals through habitat loss or indirectly by locating development adjacent to the MHPA. Affected sensitive species include: coastal California gnatcatcher, Quino checkerspot butterfly, San Diego fairy shrimp, Riverside fairy shrimp, San Diego horned lizard, Belding's orange-throated whiptail, western burrowing owl, coastal cactus wren, northern harrier, Cooper's hawk, golden eagle, least Bell's vireo, and southern California rufous-crowned sparrow. As such, the OMCPU PEIR found that these potential impacts to protected species of plants or animals would be significant. The OMCPU PEIR identified Mitigation Framework BIO-1 to reduce significant impacts to below a level of significance. Mitigation Framework BIO-1 requires the preparation of site-specific biological resources surveys before implementing development projects are approved in accordance with the

City of San Diego Biology Guidelines and mitigation for impacts to sensitive upland habitats to occur in accordance with the MSCP mitigation ratios specified within the City's Biology Guidelines (City of San Diego, 2012). In addition, the OMCPU PEIR found that potentially significant construction-related noise impacts to sensitive animals would be reduced with implementation of Mitigation Frameworks LU-2 and BIO-2. The OMCPU PEIR concluded that with implementation of Mitigation Frameworks BIO-1, BIO-2, and LU-2, potentially significant impacts to sensitive plant and animal species would be reduced to below a level of significance.

Migratory Wildlife

The OMCPU PEIR found that future development associated with the implementation of the OMCPU, including the construction of roadways and utility lines within the MHPA, would have the potential to interfere with the nesting, foraging, and movement of migratory wildlife, which would result in a significant impact. The OMCPU PEIR identified Mitigation Framework BIO-2, which requires identification of site-specific mitigation for future development projects in accordance with the City's Biology Guidelines during the discretionary review process. The OMCPU PEIR concluded that with compliance with applicable OMCPU policies and development standards and regulations, including the City's ESL Ordinance and MSCP, as well as with implementation of Mitigation Framework BIO-2, impacts to migratory wildlife would be reduced to below a level of significance.

MSCP

The OMCPU PEIR found that the OMCPU would result in significant impacts to Tier I, II, IIIA, and IIIB habitats, which include maritime succulent scrub, native grassland, Diegan coastal sage scrub, southern mixed chaparral, non-native grassland, riparian scrub, vernal pools, and basins with fairy shrimp. The OMCPU PEIR anticipated impacts to 211.6 acres of vegetation communities/land cover types within the CVSP area. The OMCPU PEIR concluded that compliance with OMCPU policies and development regulations and standards and implementation of Mitigation Framework BIO-1, requiring site specific-biological resources studies to be conducted for implementing development projects in accordance with the City's Biology Guidelines and mitigation for impacts to sensitive upland habitats to be in accordance with the MSCP mitigation ratios specified within the City's Biology Guidelines, impacts would be reduced to below a level of significance.

The OMCPU PEIR found that implementation of the OMCPU would be consistent with the MSCP, but acknowledged that the OMCPU would introduce land uses adjacent to the MHPA, which would result in a potentially-significant impact at the program-level. The OMCPU PEIR found that future development in the OMCPU area may require adjustment(s) to the MHPA boundary; however, potential impacts to the MHPA preserve configuration as a result of MHPA boundary adjustments were found to be less than significant because any such adjustment must meet the required MHPA boundary line equivalency criteria and would be subject to approval from the USFWS and California Department of Fish and Wildlife (CDFW). Additionally, the OMCPU PEIR found that potential indirect impacts would be evaluated at the project-level for consistency with the MHPA Land Use Adjacency Guidelines. The OMCPU PEIR found that although implementation of the OMCPU would introduce land uses adjacent to MHPA which would potentially result in a significant impact, compliance with established development standards and other applicable regulations of the City's Municipal Code as well as the MSCP Subarea Plan's Land Use Adjacency Guidelines, MSCP Management Policies and Directives, and Area Specific Management Directives were found to reduce impacts to below a level

of significance. Additionally, impacts due to a conflict with the MHPA Land Use Adjacency Guidelines were determined to be less than significant with implementation of Mitigation Framework LU-2.

Invasive Plant Species

The OMCPU PEIR found that the OMCPU would have the potential to introduce invasive species into the MHPA due to the large extent of future grading and development anticipated within the OMCPU area. The OMCPU PEIR concluded that assuming compliance with MHPA Land Use Adjacency Guidelines and implementation of mitigation framework LU-2, which requires the project's landscape plan to contain a mix of native species to be located adjacent to MHPA and prohibits the use of exotic plants and invasive species, impacts would be reduced to a level below significance.

Wetlands

The OMCPU PEIR found that future development projects implemented in accordance with the OMCPU would result in significant impacts to federally-protected wetlands and other jurisdictional water resources, including riparian habitat; vernal pools and vernal pool species; and basins with sensitive species of fairy shrimp. The OMCPU PEIR identified Mitigation Framework BIO-4 to reduce impacts, which requires compliance with federal wetland permitting requirements. Mitigation Framework BIO-4 also requires site-specific biological resources surveys to be conducted in association with implementing development projects in accordance with the City's Biology Guidelines, and mitigation for impacts to wetlands to be implemented in accordance with MSCP mitigation ratios specified in the City's Biology Guidelines. The OMCPU PEIR concluded that compliance with OMCPU policies, established development standards, ESL Regulations, MSCP Subarea Plan, the City's Biology Guidelines, and implementation of Mitigation Framework BIO-4, impacts would reduce impacts to wetlands, vernal pools, and other jurisdictional water resources to a level below significance at the program level.

The OMCPU PEIR found that the OMCPU would have the potential to result in significant temporary and/or noise impacts to sensitive species within the MHPA. The OMCPU PEIR concluded that compliance with applicable policies of the City's General Plan and OMCPU, ESL Regulations, MHPA Land Use Adjacency Guidelines, and the City's Biology Guidelines, as well as implementation of mitigation frameworks BIO-1 through BIO 4 and LU-2, noise-related impacts to sensitive species within the MHPA would be reduced to below a level of significance.

<u>Collection at Cactus Project</u>

Consistent with the OMCPU PEIR Mitigation Framework BIO-1, a site-specific Biological Technical Report was prepared by Alden Environmental, Inc. (Alden 2025) (*Technical Appendix A*) for the project. Alden reviewed aerial imagery, performed searches of National Wetlands Inventory (NWI), National Hydrography Dataset (NHD) mapping, California National Diversity Database (CNDDB), and U.S. Fish and Wildlife Service (USFWS) Listed Species database for information regarding wetlands and sensitive species known to occur within the project site and off-site impact area. Alden also conducted vegetation mapping, focused surveys for Burrowing Owl (BUOW) and sensitive plants, a habitat assessment for the Quino checkerspot butterfly (*Euphydryas Editha quino*), and a search for potential Waters of the U.S., Waters of the State, City Wetlands, and water-holding basins that could support species of federally listed fairy shrimp.

Sensitive Plants, Animals and Habitat

No sensitive plant species occur on-site. One sensitive animal species, California horned lark, was observed on the project site with a nest within the avoidance buffer for the disturbed wetland located in the northwest corner of the project site. The California horned lark is considered to have a low level of sensitivity, and the loss of disturbed land on the project site would not result in a significant impact to the species. However, impacts to the species' nesting could be significant and would be avoided through project compliance with the Migratory Bird Treaty Act (MBTA), the California Fish and Game Code, and the City's Standard Biological Resource Protection Measures, which are conditions of approval for the project. Thus, impacts would be less than significant.

A habitat assessment for the Quino checkerspot butterfly was conducted in 2023, and the project site was determined to have minimal potential for the Quino checkerspot butterfly. A focused survey for burrowing owl was conducted in 2024, and no individuals or evidence of burrowing owl occupation of the site was found. However, there is potential for the species to occupy the site prior to or during construction. The project would be subject to Area Specific Management Directives for the protection of MSCP-covered species, as detailed in the Biological Technical Report which would apply to the project as conditions of approval. Following the implementation of these conditions of approval, impacts would be less than significant.

Except for the disturbed wetland and the approximately 30-foot-wide buffer around the disturbed wetland, the entire project site and off-site impact areas would be directly impacted by the project. The project would result in impacts to 38.7 acres of disturbed land (Tier IV) and 1.1 acres of developed land (No tier), as shown in Table 3, *Habitat Impacts*. According to the City's Biology Guidelines, lands designated as Tier IV are not considered to have significant habitat value; therefore, the project's impacts to Tier IV disturbed land would not be significant (City of San Diego, 2018b). As discussed above, the project site is specifically designed to avoid impacts to the disturbed wetland community on site. Therefore, the project would not result in significant impacts to vegetation communities.

Migratory Wildlife

The project would not impede the movement of any native, resident, or migratory fish or wildlife species or interfere with established native, resident, or migratory wildlife corridors. The project site is largely surrounded by existing development, which severely limits connections to off-site habitat areas. Thus, the project would not significantly alter wildlife movement. Under existing conditions, the project site contains 0.05-acre of disturbed wetland. The project has been specifically designed to avoid this area and provide a 30-foot buffer; thus, impacts to disturbed wetland would be less than significant. With this designed avoidance, the project would not impact potential Waters of the U.S. and State, and no regulatory agency permits would be required.

Table 3 Habitat Impacts

IMPACTS TO VEGETATION COMMUNITIES/LAND COVER TYPES AND PROPOSED MITIGATION (acres)					
Vegetation Community/Land Cover Type[1]	**Existing on Site**	**Impacts**			**Mitigation**
		On Site	**Off Site[2]**	**Total**	
Disturbed Wetland (No tier)	0.05	0.0	0.0	0.0	NA
Disturbed Land (Tier IV)	38.5	38.4	0.3	38.7	NA
Developed land (No tier)	0.3	0.3	0.8	1.1	NA
TOTAL	**38.85**	**38.7**	**1.1**	**39.8**	**NA**

[1]Tiers=level of sensitivity. Tier I is most sensitive; Tier IV is least sensitive. Tier IV habitat impacts do not require mitigation. Developed has no tier and is not sensitive; impacts do not require mitigation.

[2]Off-site impacts occur within developed limits of Cactus Road and Continental Street.

(Alden Environmental, 2025, Table 6)

In addition, the project would not interfere with linkages identified in the MSCP Plan or the use of native wildlife nursery sites. Birds could move through the site; however, the species likely to use the project site would be the same common, urban-adapted species that use the adjacent residential development.

MSCP

Implementation of the project would result in development that is consistent with the OMCPU and CVSP. The project site is located within the boundaries of the City of San Diego's MSCP Subarea Plan. The project would be required to comply with federal, state, and City regulations and thus would not result in a conflict with the provisions of the City's MSCP Subarea Plan. The project is not located adjacent to the MHPA. The nearest MHPA is located approximately 500 feet to the west in Spring Canyon. Thus, the project would not impact the MHPA and would not result in impacts to sensitive habitats located within the MHPA.

Invasive Plant Species

The project would be developed in accordance with CVSP and OMCPU policies, including those that aim to remove invasive species. Additionally, landscape plans for the project have been reviewed by the City to confirm that they do not include any invasive species. The project is not located within or adjacent to the MHPA. Additionally, the project's landscape plans do not contain exotic or invasive species.

Wetlands

As discussed above, approximately 0.05 acres of disturbed wetland habitat are located on the project site. The project is specifically designed to avoid impacts to this resource and would provide a 30-foot-wide buffer. The first 20 feet from the channel would be the ESL avoidance buffer, and an additional 10-foot-wide buffer outside the ESL buffer would be planted with a coastal sage scrub seed mix that meets brush management requirements. Additionally, a water retention basin would be constructed adjacent to the avoidance buffer to further protect the disturbed wetland by treating stormwater runoff from the project site before it enters the channel. Additionally, and consistent with ESL avoidance standards, the project's proposed undergrounding of existing power lines at the western border of the project site has been designed to maintain full avoidance of the disturbed wetland. Specifically, the power line would transition to above-ground at the drainage crossing to eliminate the need for trenching or grading within or adjacent to the wetland, thereby avoiding direct or indirect impacts to the disturbed wetland. With this designed avoidance, the project would not impact potential Waters of the U.S. and State, and no regulatory agency permits would be required. Avoidance of this drainage channel and its protection with a buffer also eliminates impacts to potential City wetland.BIO-MM-1, Biological Resource Protections as outlined in the MMRP would ensure that the disturbed wetlands and buffer area would not be impacted during project construction activities. The project is not located adjacent to the MHPA. The nearest MHPA is located approximately 500 feet to the west in Spring Canyon. Therefore, the project would not result in impacts to sensitive species within the MHPA.

Biological Resources Impacts Conclusion

The OMCPU PEIR identified potentially significant impacts related to biological resources and included Mitigation Framework BIO-1 through BIO-4 and LU-2. Consistent with Mitigation Framework BIO-1, a site-specific Biological Technical Report was prepared for the project. Additionally, consistent with Mitigation Framework BIO-2, focused surveys were conducted on the project site, and recommendations have been applied to the project as conditions of approval for burrowing owls. In addition, as discussed above, to ensure the wetlands on site are protected during construction activities, BIO-MM-1 biological resource protection criteria are required, thereby reducing potentially significant impacts to less than significant levels. The project is not adjacent to the MHPA; thus, Mitigation Framework LU-2 does not apply to the project. As mentioned above, the project is designed to avoid wetlands on the project site; therefore, Mitigation Framework BIO-4 would not apply.

Based on the foregoing analysis and information, the project is within the scope of the analysis of the 2014 OMCPU PEIR. Thus, implementation of the project would not require a major revision to the PEIR, nor result in any new significant impacts or increase the severity of a previously identified significant impact as analyzed and described in the 2014 OMCPU PEIR.

HISTORICAL RESOURCES

2014 OMCPU PEIR

The OMCPU PEIR found that impacts to prehistoric and historical resources would include substantial adverse aesthetic impacts as well as adverse physical alteration, relocation, or

demolition of prehistoric and historic buildings, structures, objects, landscapes, and sites. The OMCPU PEIR also determined that impacts from future development could also occur at the project level. The OMCPU PEIR identified Mitigation Frameworks HIST-1 and HIST-2 to reduce potential aesthetic and physical impacts to prehistoric and historic resources. Mitigation Framework HIST-1 requires the preparation of a site-specific archaeological study and the implementation of appropriate mitigation prior to the issuance of any permit for a future development project that could affect a prehistoric or historical resource. Mitigation Framework HIST-2 would require the City to determine whether the affected building or structure is historically significant per the Historical Resources Guidelines prior to the issuance of any permit for a future development project that would directly or indirectly affect a building or structure that is more than 45 years of age. The OMCPU PEIR concluded that implementation of Mitigation Frameworks HIST-1 and HIST-2 would reduce potentially significant impacts associated with aesthetic and physical alteration or destruction of prehistoric and historic resources to below a level of significance.

Collection at Cactus Project

Consistent with OMCPU PEIR Mitigation Framework HIST-1, A site-specific Extended Phase I Cultural Resources Report was prepared by Dudek (Dudek, 2025) and is included as *Technical Appendix C*. The following analysis is based on this report.

Prehistoric or Historical Impacts

The Extended Phase I Cultural Resources Report found that the project site contains two previously recorded archaeological sites within the project boundaries. Both CA-SDI-7208 and CA-SDI-11,424 are prehistoric artifact scatters. Portions of CA-SDI-7208 were previously tested and recommended not significant under CEQA and not eligible for listing on the National Registrar of Historic Places (NRHP). CA-SDI-11,424 was previously tested, and a 4,500-square-meter significant area, as recorded by Kyle et al., was recommended as eligible for nomination to the NRHR and consequently, eligible for listing in the California Registrar of Historic Resources (CRHR). As part of the Extended Phase I testing, subsurface probes were conducted within previously unevaluated portions of CA-SDI-7208 and CA-SDI-11,424 within the project boundary to determine if these portions of the resources possess subsurface components that required evaluation testing. These probes revealed that sediments consisted largely of silty clay loam that was greatly disturbed by previous agricultural activities. These subsurface probes identified only four metavolcanic lithic flakes, whose horizontal and vertical dispersal is likely the result of repeated agricultural activity. Thus, due to the low yield of cultural material and disturbed soils, previously unevaluated portions of CA-SDI-7208 and CA-SDI-11,424 were not found to possess a subsurface component within the current project site, beyond the previously identified CA-SDI-11,424.

A City of San Diego Historic Resources Board Evaluation, conducted by Dudek and Associates (May 2025) on the 4,500 square meter primary site area of CA-SDI-11,424, concluded that the site did not exemplify any special elements that would make it eligible for historical designation under the Historic Resources Board (HRB) criteria. Specifically, archaeological excavations at CA-SDI-11,424 did not reveal any intentional design of the prehistoric workshop/habitation. All properties immediately surrounding CA-SDI-11,424 have been completely altered since the site's creation, including a recycling yard, residential buildings, and a major freeway, thus losing the integrity of the setting. Archaeological excavations at CA-SDI-11,424 revealed only simple deflated stone rock features,

lacking the complexity to warrant integrity of materials or workmanship. The surface of CA-SDI-11,424 has been significantly altered by repeated agricultural use, and there are no physical features that convey a sense of a past time or place. CA-SDI-11,424 is a ubiquitous prehistoric workstation and does not demonstrate an association with a past event, activity, or person.

Due to the presence of two archaeological sites (CA-SDI-11,424 and CA-SDI-7208) on the project site, a data recovery program, in compliance with the City of San Diego's Historical Resources Guidelines, would be implemented within the significant site area of CA-SDI-11,424. Additionally, archaeological and Native American monitoring would be required on-site during initial ground-disturbing activities. There are no historic buildings or structures on the project site, and therefore, OMCPU PEIR Mitigation Framework HIST-2 would not apply.

Historical Resources Impacts Conclusion

The OMCPU PEIR identified potentially significant impacts related to historical resources and included Mitigation Frameworks HIST-1 and HIST-2. Consistent with Mitigation Framework HIST-1, a site-specific Extended Phase I Cultural Resources Report was prepared for the project. There are no historic buildings or structures on the project site, and therefore, OMCPU PEIR Mitigation Framework HIST-2 would not apply. As indicated in the above analysis, following the implementation of MM-HIST-1, requiring data recovery and MM-HIST-2, requiring archaeological monitoring, potentially significant impacts would be reduced to less than significant levels.

Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the EIR. The project would not result in any new significant impact, nor would a substantial increase in the severity of impacts from that described in the EIR result.

HUMAN HEALTH/PUBLIC SAFETY/HAZARDOUS MATERIALS

2014 OMCPU PEIR

Wildfire Hazards

The OMCPU PEIR found that future development projects implementing the OMCPU could result in significant impacts related to wildland fires. The OMCPU PEIR identified Mitigation Framework HAZ-1 to reduce impacts. Mitigation Framework HAZ-1 requires future projects to incorporate measures in accordance with the City's Brush Management Regulations and Landscape Standards intended to reduce the risk of wildfires. The OMCPU PEIR concluded that compliance with applicable policies of the 2010 Fire Code, LDC, and California Building Code and implementation of Mitigation Framework HAZ-1 would reduce impacts related to wildland fires to below a level of significance.

Aircraft Hazards

The OMCPU PEIR found that future development projects associated with the OMCPU would have the potential to result in significant impacts related to airport operations at the Abelardo L. Rodriguez International Airport and Brown Field Municipal Airport. The OMCPU PEIR identified Mitigation Framework HAZ-2 to reduce impacts. Mitigation Framework HAZ-2 would require future development projects to obtain a Federal Aviation Administration (FAA) determination of "No Hazard

to Air Navigation." The OMCPU PEIR concluded that compliance with applicable policies of the LDC and California Building Code and implementation of Mitigation Framework HAZ-2, impacts related to airport operations would be reduced to below a level of significance.

Hazardous Substances

The OMCPU PEIR found that the OMCPU would site residential uses near existing industrial development or existing properties of environmental concern, as well as industrial and commercial land use designations, that would allow certain business and industrial operations to generate, transport, or temporarily store hazardous waste within the vicinity of residential uses. Additionally, the OMCPU PEIR noted that trucks serving local businesses would expose residents to hazards associated with the release of hazardous materials (i.e., spills, accidents, and explosions) transported through the OMCPU area. However, the OMCPU PEIR concluded that the designation of truck routes within the OMCPU area with roadway improvements in conjunction with the circulation network would reduce the potential risk of exposure from hazardous materials to residents. Additionally, the OMCPU PEIR noted that implementation of the policies contained in the General Plan, OMCPU, and regulations imposed by federal, state, and local agencies, including the U.S. Environmental Protection Agency (EPA), Resource Conservation and Recovery Act (RCRA), California Department of Health Services (DHS), County of San Diego Department of Environmental Health (DEH), and Caltrans would reduce potential impacts to below a level of significance. As such, the OMCPU PEIR concluded that impacts from exposure of people or the environment to a significant hazard, arising from the release of hazardous substances or from routine transport, use, or disposal of hazardous materials, would be less than significant and that no mitigation was required.

The OMCPU PEIR found that the OMCPU area contained hazardous material sites pursuant to Government Code Section 65962.5 and that these sites, along with any unknown hazardous sites within the OMCPU area, would have potentially significant impacts on future development and land uses within the OMCPU area. The OMCPU PEIR identified Mitigation Framework HAZ-3 to reduce impacts, which requires the preparation of a Phase I Site Assessment prior to the approval of implementing development and requires that all on-site contamination be avoided or remediated in compliance with local, state, and federal regulations. The OMCPU PEIR concluded that with compliance with the General Plan and OMCPU policies and local, state, and federal regulations, and implementation of the Mitigation Framework HAZ-3, potential impacts associated with hazardous sites would be reduced to below a level of significance.

<u>Collection at Cactus Project</u>

Wildfire Hazards

The project site is located within a Very High Fire Hazard Severity Zone (VHFHSZ) per the City Official Very High Fire Hazard Severity Zone Map. However, the project has been designed consistent with all brush management and landscaping regulations intended to reduce the risk of wildfires as required by OMCPU Final PEIR Mitigation Framework HAZ-1. Furthermore, San Diego Fire-Rescue Department Station 43 is located approximately 1.5 miles east of the project site, providing immediate emergency response in the event of a wildfire. Therefore, the project would not expose people to substantial risk associated with wildfires, and impacts would be less than significant.

Aircraft Hazards

The project is subject to the FAA's Part 77 imaginary surfaces and Terminal Instrument Procedures and FAA requirements and obtained an FAA determination of "No Hazard to Air Navigation" on October 16, 2025, consistent with Mitigation Framework HAZ-2. Following implementation of the required policies and Mitigation Frameworks included in the OMCPU PEIR, the project's impacts would be less than significant.

Hazardous Substances

A site-specific Phase I Environmental Site Assessment (Phase I ESA) was prepared by Hillmann Consulting (Hillman, 2023) and is included as *Technical Appendix K1*. Additionally, a site-specific Limited Phase II Investigation was prepared by Hillmann Consulting (Hillmann, 2023) and is included as *Technical Appendix K2.* Additionally, a site-specific Soil Management Plan (SMP) was prepared by C Young Associates (C Young, 2024) and is included as *Technical Appendix L.* The following analysis is based on those reports.

The Phase I Assessment found that the project site did not contain any recognized environmental conditions; however, the project was found to have been historically utilized as agricultural land from at least 1949 to 1996. Due to the site's historical agricultural use, the historic use of pesticides was considered a business environmental risk, and a Limited Phase II Investigation was recommended. The Limited Phase II Assessment determined the project site had residual contamination of pesticides above the residential levels. An SMP was prepared in accordance with Mitigation Framework HAZ-3 and includes soil management requirements that the project would be required to implement as part of the project conditions of approval. With the implementation of the requirements included in the SMP, the impacts would be less than significant.

Construction activities associated with the project would require the transportation and use of limited quantities of hazardous construction materials. However, these materials are not acutely hazardous, and their use in small quantities would not pose a significant hazard to the public or the environment. The use of hazardous materials and substances during construction would be subject to federal, state, and local health and safety regulations. Additionally, construction activities are inherently temporary in nature. As a result, hazardous material impacts related to construction activities would be less than significant.

The project includes residential and recreational land uses that are not associated with routine use, transport, or disposal of hazardous materials. Additionally, the project is not located in proximity to existing or planned industrial land uses that may utilize hazardous substances. Therefore, with implementation of mandatory regulatory requirements, the project would result in less-than-significant impacts due to the routine transport, use, or disposal of hazardous materials, and less-than-significant impacts associated with reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

The project site is not located on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. The project does not include land uses that would result in a significant hazard to the public or environment, and impacts would be less than significant.

Hazardous Materials Impacts Conclusion

The OMCPU PEIR identified potentially significant impacts related to human health, public safety, and hazardous materials, and included Mitigation Frameworks HAZ-1 through HAZ-3. The project would be required to comply with applicable LDC and California Building Code (CBC) and would be required to implement Mitigation Framework HAZ-1. Additionally, the project was required to obtain FAA determination of "No Hazard to Air Navigation", consistent with Mitigation Framework HAZ-2. In accordance with Mitigation Framework HAZ-3, an SMP was prepared for the project.

Based on the foregoing analysis and information, the project is within the scope of the analysis of the 2014 OMCPU PEIR. Thus, implementation of the project would not require a major revision to the PEIR, nor result in any new significant impacts or increase the severity of a previously identified significant impact as analyzed and described in the 2014 OMCPU PEIR.

HYDROLOGY/WATER QUALITY

2014 OMCPU PEIR

Section 5.7 of the OMCPU PEIR provides an analysis of hydrology and water quality impacts associated with the OMCP.

Hydrology (Runoff, Natural Drainage Systems, and Flow Alterations)

The OMCPU PEIR found that buildout of the OMCPU would result in an increase in impervious surfaces and associated increased runoff, and would result in substantial alterations to on- and off-site drainage; therefore, the OMCPU PEIR found that buildout of the OMCPU would result in potentially significant impacts associated with increased runoff which could result in substantial alteration to on- and off-site drainage patterns due to changes in runoff flow rates or volumes. The OMCPU PEIR identified Mitigation Framework HYD/WQ-1, which requires that the design and function of future projects do not impact downstream drainage patterns. HYD/WQ-1 requires future projects to demonstrate to the satisfaction of the City Engineer, that future projects are sited and designed to minimize impacts on absorption rates, drainage patterns, and surface runoff rates and floodwaters in accordance with City and Regional Water Quality Control Board (RWQCB) regulations. Regulatory compliance with the City's Storm Water Standards Manual and RWQCB regulations is typically achieved through the preparation of a storm water quality management plan and would reduce impacts to natural drainage systems to a level less than significant.

Water Quality

The OMCPU Final PEIR determined that impacts to water quality would be potentially significant, as future projects constructed during buildout of the OMCP could result in discharges to surface water or groundwater. Grading and exposed soil could result in sedimentation. Residential development could result in the discharge of sediment, nutrients, trash and debris, oxygen-demanding substances, oil and grease, pesticides, and bacteria and viruses. Industrial operations are known to be a source of heavy metals, oily wastes, and various other substances dependent on the specific industrial operation. Projects would be required to prepare a Storm Water Pollution Prevention Plan (SWPPP). Development of parks, schools, roads, and other public infrastructure would contribute to

any of the identified pollutants noted above. OMCPU Final PEIR Mitigation Framework HYD/WQ-2 requires future projects to be sited and designed to minimize impacts on receiving waters, which would reduce impacts associated with water quality to a level less than significant.

Collection at Cactus Project

Consistent with Mitigation Frameworks HYD/WQ-1 and HYD/WQ-2, a site-specific Preliminary Drainage Report was prepared by Bowman (Bowman, 2024) and is included as *Technical Appendix E* to this document. The following analysis is based on this document.

Under existing conditions, the project site is vacant and undeveloped. The majority of the project site drains to the north into the existing channel on-site. On-site drainage improvements would include two on-site water quality/hydromodification basins with a storm drain system to safely convey runoff through the project to the biofiltration basins to address water quality, hydromodification and peak flow mitigation before discharging into the existing drainage system similar to existing conditions. As concluded in the Preliminary Drainage Report, the project would result in 100-year flow rates less than the existing peak flow rates. Thus, project impacts to on-site drainage patterns would be less than significant.

The project conforms to the land use configurations and intensities identified in the OMCPU PEIR. Future development associated within the project would increase impervious surfaces in the project area, which would lead to increased runoff that could exceed the capacity of existing or planning stormwater drainage systems and/or provide additional sources of polluted runoff. However, the project is required to design storm drain systems that comply with the requirements of the City's Storm Water Standards Manual, which outlines requirements for improvement programs and implementation of storm water best management practices (BMPs). Additionally, in accordance with the City's Municipal Storm Water Permit, development on the project site would be required to implement BMPs during construction. Therefore, impacts due to runoff would be less than significant.

The project would include a storm drain system consisting of inlets, pipes, brow ditches, roof drains, four modular wetland units located on Cactus Road and Continental Street, and two water quality detention basins located in the northern and central areas of the project site. As previously discussed above, the project would generally maintain the existing drainage pattern. The project would be subject City Storm Water Standards and applicable General Plan and OMCPU policies. The project would also be subject to Mitigation Framework HYD/WQ-2, requiring compliance with RWQCB and NPDES requirements.

As discussed in the project-specific Drainage Report, the project's 100-year flow rates would be less than the existing peak flow rates. Additionally, the project would not result in runoff that would substantially impact the Otay or Tijuana River Valley basins. Therefore, impacts to the natural drainage pattern would be less than significant.

Significant impacts associated with altered flow patterns would result if a project-related increase in stormwater flows would increase on- or off-site flooding hazards pursuant to mapped FEMA floodplains. The project site does not contain FEMA special flood hazards areas; thus, the project is not at risk of substantial flooding. As stated above, the project would be required to comply with

existing policies, regulations to ensure impacts to local or regional surface or ground water quality impacts would be less than significant. Project buildout would not result in substantial alteration to existing drainage flow on the project site. Additionally, the project would not result in an increase in 100-year flows in comparison to existing peak flows on the project site.

The project would be subject to applicable federal, state, and local, regulations, and would be required to implement storm water BMPs. Additionally, the project would be required to implement Mitigation Framework HYD/WQ-1 to reduce impacts to on- or off-site drainage patterns and off-site erosion and sedimentation, and Mitigation Framework HYD/WQ-2 to reduce surface and ground water quality impacts and pollutant discharge impacts in accordance with the requirements of the City's Storm Water Runoff and Drainage Regulations and other appropriate agencies. As discussed in the project-specific Drainage Report, the project would be subject to BMPs that would prevent χincreases in pollutant concentrations and discharges into ground water. Thus, impacts due to ground water quality and pollutant runoff due to the project would be less than significant.

Hydrology And Water Quality Impacts Conclusion

The OMCPU PEIR identified potentially significant impacts related to hydrology and water quality and included Mitigation Frameworks HYD/WQ-1 and HYD/WQ-2. Consistent with the requirements of Mitigation Framework HYD/WQ-1, the project would not result in a substantial increase in runoff, alternation of drainage patterns, or off-site erosion or runoff. The project would be required to implement Mitigation Framework HYD/WQ-2, which would reduce pollutant discharges.

Based on the foregoing analysis and information, the project is within the scope of the analysis of the 2014 OMCPU PEIR. Thus, implementation of the project would not require a major revision to the PEIR, nor result in any new significant impacts or increase the severity of a previously identified significant impact as analyzed and described in the 2014 OMCPU PEIR.

GEOLOGY/SOILS

2014 OMCPU PEIR

Section 5.8 of the OMCPU PEIR provides an analysis of geology and soils impacts associated with the OMCP.

Geologic Hazards

The OMCPU PEIR found that the OMCPU area contains geologic conditions that could expose people or property to geologic hazards at the project-level; therefore, future development associated with implementation of the OMCPU would result in potentially significant impacts related to geologic hazards. The OMCPU PEIR noted that although no Alquist-Priolo Earthquake Fault Zones occur within the OMCPU area, the OMCPU area is subject to moderate to high geologic risk area due to the presence of the La Nación Fault Zone, which is located 2.3 miles west of the project site. Faults in this zone are considered to be potentially active and would subject the OMCPU area to moderate to severe ground shaking. The OMCPU PEIR also concluded that the potential for liquefaction and seismically induced settlement on mesa top areas such as the project site is very low due to the very dense cemented condition of the geologic formations and lack of groundwater. The OMCPU PEIR

also disclosed that a complex of deep-seated landslides known as the San Ysidro Landslide is present in the western and southern edges of the OMCPU area. Apparent landslide debris was found to at least 100 feet below the ground surface, placing the bottom of the landslides below present sea level and indicating an ancient and complex history of movement. The OMCPU PEIR concluded that assuming compliance with applicable General Plan and OMCPU policies and implementation of Mitigation Framework GEO-1, which requires adherence to a site-specific Geotechnical Report, potential impacts related to geologic hazards would be reduced to below a level of significance.

Erosion

The OMCPU PEIR found that buildout of the OMCPU would result in potentially significant impacts related to soil erosion due to the steep hillsides and loose nature of sedimentary materials and soils contained within the OMCPU area. The OMCPU PEIR identified Mitigation Framework GEO-2 to reduce potential impacts, which generally requires future development projects to adhere to the City's Grading Regulations, National Pollutant Discharge Elimination System (NPDES) permit requirements, and the recommendations included in future site-specific geotechnical reports prepared in conformance with the City's Geotechnical Report Guidelines, CBC, and LDC as would be required for implementing developments. The OMCPU PEIR concluded that assuming compliance with applicable General Plan and OMCPU policies and implementation of Mitigation Framework GEO-2, impacts associated with erosion would be reduced to below a level of significance.

Collection at Cactus Project

Geologic Hazards

In accordance with PEIR Mitigation Framework MM-GEO-1, which requires future implementing projects to adhere to the City's Seismic Safety Study and prepare a site-specific geotechnical report to reduce potential geologic impacts through site-specific recommendations, a site-specific Due Diligence Geotechnical Investigation and Update Letter were prepared by Geocon, Inc.(Geocon, 2023; Geocon, 2024) and are included as *Technical Appendix B1* and *Technical Appendix B2.* The Geotechnical Investigation notes that the project site is not located in a seismically active region and that no active faults are known to exist at the site. Additionally, the site is not situated within an Alquist-Priolo Earthquake Fault Zone or a Special Studies Zone. The nearest known active fault is located approximately nine miles west of the project site. The project would be required to comply with the recommendations provided in the project-specific Geotechnical Evaluation as mandatory conditions of approval.

The liquefaction potential and seismic settlement potential on the project site are considered negligible due to the apparent density of the underlying formation and lack of a shallow groundwater table. Additionally, the Geotechnical Evaluation concludes that the potential for landslides and rockfall is considered low. Furthermore, the project site would not be subject to seiches and tsunamis due to site elevation and distance from an open body of water. Therefore, the project would not expose people or structures to substantial adverse effects, including the risk of loss, injury, or death from rupture of a known earthquake fault, strong seismic ground shaking, seismic-related ground failure (including liquefaction), landslides, or similar hazards. Impacts would be less than significant.

Erosion

Regarding erosion, the site-specific SWQMP documented that the project would be required to prepare a SWPPP implementing construction BMPs consistent with the performance standards in the City's Storm Water Standards Manual. Furthermore, the project would comply with the City's grading regulations and the National Pollutant Discharge Elimination System (NPDES) permit, consistent with the OMCPU Final PEIR Mitigation Framework GEO-2. Therefore, impacts related to erosion would be less than significant.

Geology And Seismic Hazards Impacts Conclusion

Based on the foregoing analysis and information, the project is within the scope of the analysis of the 2014 OMCPU PEIR. Thus, implementation of the project would not require a major revision to the PEIR, nor result in any new significant impacts or increase the severity of a previously identified significant impact as analyzed and described in the 2014 OMCPU PEIR.

ENERGY CONSERVATION

2014 OMCPU PEIR

The OMCPU PEIR found that construction of future projects associated with implementation of the OMCPU would not result in the use of excessive amounts of fuel or other forms of energy, and construction-related impacts would be less than significant. In addition, the OMCPU PEIR found that implementation of the OMCPU would not result in the need for new electrical systems or require substantial alteration of existing utilities; therefore, assuming compliance with local and state mandates for energy conservation and OMCPU policies related to energy reduction measures, the OMCPU PEIR found that long-term operation impacts associated with energy use would be less than significant.

Collection at Cactus Project

The project would be required to meet mandatory energy standards of the current California energy code. Energy used for construction would primarily consist of diesel and gasoline consumed by construction equipment, as well as construction worker commutes and the transportation of construction materials. Due to the temporary nature of construction and the financial incentives for developers and contractors to use energy-efficiently, the construction phase of the project would not result in wasteful, inefficient, or unnecessary energy consumption. Impacts due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction would be less than significant.

Operation of the project would consume energy as part of building operations and transportation activities. Building operations would involve energy consumption for multiple purposes, including, but not limited to, building heating and cooling, refrigeration, lighting, and electronics. The project would be designed and constructed in accordance with the City's latest adopted energy efficiency standards, which are based on California Title 24. Operational energy would also be consumed during vehicle trips associated with the future residential uses. Fuel consumption would be primarily

related to vehicle use by residents and visitors associated with the project. The project would provide EV infrastructure, further promoting fuel-efficient vehicles. Therefore, operational-related transportation fuel consumption would not result in a significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources. Impacts would be less than significant.

Energy Impacts Conclusion

Based on the foregoing analysis and information, the project is within the scope of the analysis of the 2014 OMCPU PEIR. Thus, implementation of the project would not require a major revision to the PEIR, nor result in any new significant impacts or increase the severity of a previously identified significant impact as analyzed and described in the 2014 OMCPU PEIR.

NOISE

2014 OMCPU PEIR

The OMCPU PEIR noted that the OMCPU area has the potential to expose noise-sensitive uses to noise levels in excess of standards established in the City's General Plan, Noise Abatement and Control Ordinance ("Noise Ordinance"; Section 59.5.0101 et seq. of the City's Municipal Code), and land use compatibility guidelines in the Brown Field Comprehensive Land Use Plan (City of San Diego, 2018). The PEIR noted that mandatory compliance with federal, state, and local regulations and policies would reduce direct and indirect impacts associated with the generation of noise levels in excess of standards established in the General Plan or Noise Abatement and Control Ordinance. The PEIR also imposed Mitigation Framework NOI-1 and NOI-2, which require regulatory compliance to ensure that impacts related to exterior and interior noise are reduced; however, even with strict adherence to the Mitigation Framework, the OMCPU PEIR concluded that these impacts cannot be reduced to below a level of significance and therefore concluded that the impacts would remain significant and unavoidable.

The OMCPU PEIR found that buildout of the OMCPU would locate noise-sensitive residential uses adjacent to noise-generating commercial and industrial uses, which would result in potentially significant noise impacts. The OMCPU PEIR identified mitigation framework NOI-3 to reduce potential impacts, which generally requires the preparation of a site-specific acoustical/noise analysis in accordance with the City Acoustical Report Guidelines and policies contained in the General Plan and OMCPU. The OMCPU PEIR concluded that even with implementation of mitigation framework NOI-3, potential impacts would remain significant. As such, impacts related to the generation of noise that exceed City standards were disclosed as a significant and unavoidable impact and a statement of overriding considerations was adopted.

The OMCPU PEIR found that buildout of the OMCPU would not result in the exposure of people to current or future noise levels which exceed standards established in the land use compatibility guidelines in the Brown Field Municipal Airport Land Use Plan Compatibility Plan. Buildout of the OMPCU would not locate residential uses within the Brown Field contours and noise levels would not exceed 70 Community Noise Equivalent Level (CNEL) at nearby industrial uses, which is the noise level standard established in the Brown Field land use compatibility guidelines. Furthermore, the OMCPU PEIR found that the OMPCU would not locate residential uses within the General Abelardo L.

Rodriguez International Airport 70 CNEL contour. Therefore, the OMCPU PEIR concluded that impacts due to exposure of people to current or future noise levels which exceed standards established in the land use compatibility guidelines in the Brown Field Municipal Airport Land Use Plan Compatibility Plan would be less than significant.

The OMCPU PEIR concluded that future construction activities would be required to comply with the recommendations included in project-specific acoustical reports prepared in accordance with City Acoustical Report Guidelines, the General Plan, OMCPU policies, and other regulatory or guidance documents. Additionally, the OMCPU PEIR imposed Mitigation Framework NOI-4, which requires compliance with the City's Noise Abatement and Control Ordinance to reduce construction-related noise impacts. The OMCPU PEIR also imposed Mitigation Framework LU-2, which requires development projects adjacent to designated MHPA areas to comply with the Land Use Adjacency Guidelines in the MSCP in terms of noise. However, even with strict adherence to the Mitigation Frameworks, impacts due to construction-related noise adversely impacting sensitive receptors and sensitive bird species with the MHPA were found to be significant and unavoidable.

Collection at Cactus Project

In accordance with OMCPU PEIR Mitigation Framework NOI-3, a project-specific Noise Report was prepared by Dudek (Dudek, 2024) (*Technical Appendix F*). The following discussion is based on this report.

Construction-Related Activities

Construction activities associated with the project would increase ambient noise levels in the vicinity on an intermittent but temporary basis. Noise levels during construction would fluctuate depending on the construction phase, equipment type, and duration of use, distance between the noise source and receptor, and the presence or absence of barriers between the noise source and receptor. Consistent with the findings in the OMCPU PEIR, the project would be subject to compliance with federal, State, and local regulations and policies which would reduce construction-related noise impacts, including MM-NOI-1 and MM-NOI-2 requiring regulatory compliance. The site-specific Noise Report details the construction noise analysis completed for the project, and the results are shown on Table 4, *Construction Noise Levels*. As shown, construction noise from the project would not exceed the City of San Diego significance threshold during any phase of construction, and the impacts would be less than significant.

Table 4 Construction Noise Levels

Construction Phase (and Equipment Types Involved)	12-Hour L_{eq} at Nearest Noise-Sensitive Receptor to Construction Site Boundary (dBA)	12-Hour L_{eq} at Nearest Noise-Sensitive Receptor to Acoustical Centroid of Site (dBA)	Threshold Exceedance?
Site Preparation (dozer, backhoe)	71.5	60.4	No
Grading (grader, scraper, dozer, excavator,	74.8	64.4	No

Construction Phase (and Equipment Types Involved)	12-Hour L_{eq} at Nearest Noise-Sensitive Receptor to Construction Site Boundary (dBA)	12-Hour L_{eq} at Nearest Noise-Sensitive Receptor to Acoustical Centroid of Site (dBA)	Threshold Exceedance?
backhoe, rock drill, hoe ram, rock crusher)			
Building construction (crane, man-lift, generator, backhoe, welder/torch)	70.3	56.9	No
Architectural finishes (air compressor)	64.8	51.5	No
Paving (paver, roller, other equipment)	73.9	58.8	No

(Dudek, 2024, Table 10)

The project conforms to the development area identified in the OMCPU, as amended by the CVSP. As such, it can be reasonably assumed that construction of the project would result in the same or slightly reduced noise levels as compared to what was disclosed by the OMCPU PEIR and the CVSP Addendum.

Although construction noise would be localized to discrete areas during construction, businesses, residences, and recreational facilities could be intermittently exposed to temporarily elevated noise levels throughout the construction period. Specifically, the OMCPU PEIR indicated that CAGN occupying habitat in the MHPA could be adversely impacted by temporary construction noise if construction occurs during the breeding season. The project is not located adjacent to the MHPA. The nearest MHPA is located approximately 500 feet to the west in Spring Canyon. Thus, the project would not impact the CAGN occupying habitat in the MHPA.

Long-Term Operational Activities

Under long-term operation, the project would have the potential to exceed the noise significance criteria contained in the Noise Element of the General Plan. The project would result in a slight increase in regional and local traffic volumes and is anticipated to generate approximately 6,085 trips in the local vicinity, thereby increasing the existing roadway volumes. The project is expected to generate a CNEL increase of 5 dB (decibels). While this increase is considered a noticeable change in existing noise levels, it is below the threshold for a substantial increase, according to the 1992 Federal Interagency Committee on Noise (FICON) findings. The FICON recommendations define a substantial increase as 5 dB or more for areas with existing noise levels below 60 dBA, 3 dB or more for areas with existing noise levels between 60-65 dBA, and 2 dB or more for areas with existing noise levels above 65 dBA. Thus, a less-than-significant impact is expected for project-related off-site traffic noise increases affecting existing residences in the vicinity.

With respect to traffic-related noise impacts on the MHPA, and as documented in Addendum No. 408329 to the OMCPU PEIR, buildout of the CVSP (including the project site) would result in a reduction in average daily traffic as compared to what was evaluated in the OMCPU PEIR, thereby resulting in reduced vehicular-related noise impacts as compared to what was evaluated and

disclosed by the OMCPU PEIR. Specifically, the buildout of the CVSP would result in 36,354 external daily trips, compared to the 41,109 external daily trips assumed for the CVSP area in the OMCPU PEIR. The project's vehicular trips would be within the traffic assumptions for the overall CVSP area; thus, the project would generate similar traffic-related noise compared to the assumptions in Addendum No. 408329 and would be below the traffic-related noise assumptions in the CVSP area by the OMCPU PEIR. Impacts would be less than significant.

On-Site Noise Impacts

Due to the project's location, the project site would have exposure to local roadways and SR 905. The prediction results from Table 7 of the Noise Report indicate that future traffic noise levels would range close to but not exceed 74 dBA CNEL at facades that have a line of sight to the nearby SR 905 freeway to the north of the project. With the 45 dBA CNEL interior background sound level limit, this means the minimum composite sound transmission class (STC) rating for the exterior shell separating the habitable interior space from the outdoor sound level should be at least 29. The Noise Study concluded that when windows and doors are closed, all facades are anticipated to exhibit a predicted STC rating of at least 34 and thus would provide sufficient exterior-to-interior sound insulation from outdoor traffic noise to yield interior background noise levels that are less than 45 dBA CNEL and thus compliant with the City and state standards. None of the predicted exterior traffic noise levels at the studied receptor locations exceeded 74 dBA CNEL; thus, the STC rating value (for closed windows and doors) subtracted from these exterior noise values must result in interior noise levels of less than 45 dBA .This apparent requirement for closed windows and doors means that the design of these habitable rooms should feature mechanical ventilation or an air-conditioning system to provide interior comfort of the occupants. Thus, the City's threshold of 45 dB CNEL within habitable rooms would not be exceeded and considered less than significant.

Noise generated by certain land uses in the project area could lead to potential land-use incompatibility. Noise levels at the property line that exceed Section 59.5.0401 of the City's Municipal Code are considered potentially significant. Section 59.5.0401 sets the exterior noise limit for 50 dBA Leq for daytime hours of 7 a.m. to 7 p.m. and 45 dBA Leq during noise-sensitive nighttime hours of 7 p.m. to 7 a.m. As previously stated, the project buildout would not result in the collocation of residential and non-residential uses within or adjacent to the project site.

Noise Impacts Conclusion

Based on the foregoing analysis and information, the project is within the scope of the analysis of the 2014 OMCPU PEIR. Thus, implementation of the project would not require a major revision to the PEIR, nor result in any new significant impacts or increase the severity of a previously identified significant impact as analyzed and described in the 2014 OMCPU PEIR.

PALEONTOLOGICAL RESOURCES

2014 OMCPU PEIR

The OMCPU PEIR found that the OMCPU area contains geologic structures with moderate and high sensitivity potential for paleontological resources; therefore, implementation of the OMCPU was determined to result in a potentially significant impact on paleontological resources. The OMCPU

PEIR identified Mitigation Framework PALEO-1 to reduce potential impacts, which generally requires future development projects to monitor for paleontological resources during construction activities and to be sited and designed to minimize impacts on paleontological resources in accordance with the City's Paleontological Resources Guidelines and CEQA Significance Thresholds. The OMCPU PEIR found that with implementation of Mitigation Framework PALEO-1, program-level impacts related to paleontological resources would be reduced to below a level of significance. (City of San Diego, 2014, pp. 5.11-5 through 5.11-9)

Collection at Cactus Project

Review of Figure 5.11-1 of the OMCPU Final PEIR determined that the project site is located within an area identified as being underlain by Very Old Paralic deposits (Qvop, formally known as the Lindavista Formation), which have been designated as having a moderate sensitivity level for paleontological resources. According to the grading quantities submitted with the project tentative map, the project would require 17,550 cubic yards of cut to a depth of 4 feet. Therefore, the project would not exceed the City's established significance threshold for a project requiring excavation within an area identified as having a moderate paleontological sensitivity rating, and impacts would be less than significant.

Paleontological Resources Impacts Conclusion

The OMCPU PEIR identified potentially significant impacts related to paleontological resources and included Mitigation Framework PALEO-1. However, Mitigation Framework PALEO-1 would not apply because the project would not exceed the City's established significance threshold for a project requiring excavation within an area identified as having a moderate paleontological sensitivity rating.

Based on the foregoing analysis and information, the project is within the scope of the analysis of the 2014 OMCPU PEIR. Thus, implementation of the project would not require a major revision to the PEIR, nor result in any new significant impacts or increase the severity of a previously identified significant impact as analyzed and described in the 2014 OMCPU PEIR.

TRAFFIC/CIRCULATION

2014 OMCPU PEIR

The OMCPU PEIR found that buildout of the OMCPU would result in significant impacts to roadway segments, intersections, and SR-905 freeway segments and metered freeway on-ramps. The OMCPU PEIR concluded that implementation of the OMCPU would result in significant and unmitigated impacts to 24 roadway segments. The OMCPU PEIR identified Mitigation Framework TRF-1 to reduce impacts to 49 intersections, which generally requires intersections to be improved in accordance with the intersection lane designations identified Figure 5.12-4 of the OMCPU PEIR; however, the OMCPU PEIR found that 39 of the 49 intersections would remain significantly impacted after mitigation. In addition, the OMCPU PEIR found that at the program-level, OMCPU impacts to five SR-905 freeway segments would remain significant and unmitigated. With respect to freeway ramp metering, the OMCPU PEIR concluded that due to the uncertainty associated with implementing freeway improvements, limitations on increasing ramp capacity, and uncertainty

regarding implementation of Transportation Demand Management measures, five freeway ramp impacts associated with the OMCPU would remain significant and unmitigated at the program-level after implementation of mitigation. As such, the OMCPU PEIR disclosed that impacts to roadway segments, intersections, and the SR-905 freeway segments and metered on-ramps were significant and unmitigated and a statement of overriding considerations was adopted.

The OMCPU PEIR found that roadway improvements associated with the buildout of the OMCPU would be constructed in accordance with City design standards and applicable OMCPU policies. Therefore, the OMCPU PEIR concluded that impacts associated with traffic hazards for motor vehicles, bicyclists, and pedestrians would be less than significant.

The OMCPU PEIR found that buildout of the OMCPU would not create alterations to present circulation movements in the area, and that no existing public access points would be permanently closed. Therefore, the OMPCU PEIR concluded that impacts associated with circulation and access would be less than significant with no mitigation required.

The OMCPU PEIR found that the OMCPU policies would be consistent with the City's General Plan policies supporting alternative transportation modes. Therefore, the OMCPU PEIR concluded that there would be no impact and mitigation would not be required.

Collection at Cactus Project

Senate Bill 743 (SB 743) was passed in 2013, which required that by July 1, 2020, a project's transportation impacts be evaluated based on a Vehicle Miles Traveled (VMT) measure, instead of evaluating impacts based on Level of Service (LOS) criteria. The Natural Resources Agency finalized updates to the CEQA Guidelines in January 2019 that were approved by the Office of Administrative Law and are currently in effect. CEQA Guidelines Section 15064.3(b) now includes specific considerations for evaluating a project's transportation impacts using a VMT measure, instead of evaluating impacts based on LOS criteria, as required by SB 743. As noted above, the Guidelines changes with respect to VMT took effect on July 1, 2020, while the OMCPU PEIR was certified in 2014. The analysis below utilizes LOS as the basis for determining transportation impacts under CEQA Guidelines Section 15064.3(c) and 15007(c).
In order to evaluate the project's potential to impact the surrounding circulation network and to determine whether the project's impacts are within the scope of the OMCPU PEIR, a project-specific Transportation Impact Study (TIS) was prepared by CR Associates (CR Associates, 2026) and is included as *Appendix G*.

Existing 2024 Traffic Counts

The intersection LOS analysis is based on the traffic volumes observed during the peak hour conditions using traffic count data collected in May 2024.

Intersection Level of Service for Existing Conditions

Existing peak hour traffic operations have been evaluated for the study area intersections based on the analysis methodologies presented in Section 2.0 of the project's TIS. The study area is shown in Figure 6, *Traffic Study Area*. The intersection operations analysis results are summarized in Table 5,

Intersection Analysis for Existing Conditions, which indicates that all existing study area intersections are currently operating at LOS C or better during both AM and PM peak hours.

Table 5 Intersection Analysis for Existing Conditions

#	Intersection	Control Type	AM Peak Hour		PM Peak Hour	
			Avg. Delay (sec)	LOS	Avg. Delay (sec)	LOS
1	Cactus Rd & Otay Mesa Rd	Signal	14.7	B	18.7	B
2	Continental St & Otay Mesa Rd	Signal	14.7	B	6.2	A
3	Britannia Blvd & Otay Mesa Rd	Signal	12.9	B	15.4	B
4	Britannia Blvd & SR-905 WB Ramps	Signal	15.9	B	20.2	C
5	Britannia Blvd & SR-905 EB Ramps	Signal	15.2	B	19.8	B
6	Britannia Blvd & Airway Rd	Signal	33.7	C	32.8	C
7	Continental St & Airway Rd[1]	SSSC	10.0	A	10.4	B
8	Cactus Rd & Airway Rd[1]	AWSC	7.8	A	7.7	A
9	La Media Rd & Airway Rd	Signal	Closed[2]			
14	Continental St & Colchester Ct	AWSC	6.9	A	6.7	A

Notes:
[1] The estimated ADT signal warrant would not be met for this intersection based on analyzed traffic volumes per the Average Traffic Estimate Form. Estimated ADT signal warrants are provided in Appendix I.
[2] Closed due to La Media Road CIP Project (CIP # S-15018)
AWSC = All-Way Stop-Controlled. For AWSC intersections, the delay shown is the average delay for the entire intersection.
SSSC = Side-Street Stop-Controlled. For SSSC intersections, the delay shown is the worst delay experienced by any of the movements.
(CR Associates, 2026, Table 4.2)

Roadway Segment Analysis for Existing Conditions

Table 6, *Roadway Segment Analysis for Existing Conditions* , provides a summary of the Existing (2024) conditions roadway segment capacity analysis. As shown, all study segments currently operate at

Table 6 Roadway Segment Analysis for Existing Conditions

Roadway	Segment	Functional Classification	Capacity (LOS E)	ADT	V/C	LOS
Otay Mesa Rd	West of Cactus Rd	6-Lane Prime Arterial	60,000	11,615	0.194	A
Otay Mesa Rd	Cactus Rd to Continental St	6-Lane Prime Arterial	60,000	12,362	0.206	A
Otay Mesa Rd	Continental St to Britannia Blvd	6-Lane Prime Arterial	60,000	13,456	0.224	A
Otay Mesa Rd	East of Britannia Blvd	6-Lane Prime Arterial	60,000	11,859	0.198	A
Britannia Blvd	Otay Mesa Rd to SR-905 WB Ramps	6-Lane Prime Arterial	60,000	12,323	0.205	A
Britannia Blvd	SR-905 WB Ramps to SR-905 EB Ramps	6-Lane Prime Arterial	60,000	21,031	0.351	A
Britannia Blvd	SR-905 EB Ramps to Airway Rd	5-Lane (2NB/3SB) Prime Arterial	50,000	30,204	0.604	C
Britannia Blvd	South of Airway Rd	3-Lane Major Arterial	30,000	18,333	0.611	C
Airway Rd	Cactus Rd to Park Wy	2-Lane Collector w/o TWLTL	8,000	3,735	0.467	C
Airway Rd	Park Wy to Continental St	2-Lane Collector w/o TWLTL	8,000	3,735	0.467	C
Airway Rd	Continental St to Britannia Blvd	2-Lane Collector w/o TWLTL	8,000	4,403	0.550	C
Airway Rd	Britannia Blvd to 50 feet west of La Media Rd	2-Lane Collector w/o TWLTL	8,000	8,075	1.009	**F**
Airway Rd	50 feet west of La Media Rd to La Media Rd	2-Lane Collector w/o TWLTL	8,000	8,075	1.009	**F**
Cactus Rd	Street D to Airway Rd	2-Lane Collector w/o TWLTL	8,000	342	0.043	A
Cactus Rd	South of Airway Rd	2-Lane Collector w/o TWLTL	8,000	3,402	0.425	B
Continental St	Street D/Colchester Ct to Airway Rd	2-Lane Collector w/o TWLTL	8,000	468	0.059	A

Note:
ADT = Average Daily Traffic
V/C = Volume to Capacity Ratio
TWLTL = Two-Way Left-Turn Lane
Bold = LOS E or F
(CR Associates, 2026, Table 4.1)

LOS C or better under Existing conditions, with the exception of the following two roadway segments: ▪

- Airway Road, between Britannia Boulevard and 50 feet west of La Media Road – LOS F; and
- Airway Road, between 50 feet west of La Media Road and La Media Road – LOS F.

Table 7, *Freeway Segment Analysis – Existing Conditions*, displays freeway segment level of service results for the study area freeway mainline facilities under Existing conditions. As shown, all freeway segments within the study area operate at acceptable LOS B or better under existing conditions.

Project Trip Generation

Project's trip generation summary is shown in Table 8, *Project Trip Generation Summary.* As shown, the project would be expected to generate a total of approximately 6,085 average daily trips, with 480 (99-in/381-out) during the AM peak hour and 546 (380-in/166-out) during the PM peak hour. The trip distribution for the project was adjusted specifically to the project taking into consideration the existing transportation network.

Existing Plus Project (E+P) Conditions

This subsection provides an analysis of existing traffic conditions with the addition of project trips from full development of the proposed project. Under this scenario, the proposed project's buildout traffic volumes are added to the existing traffic volumes and roadway configuration, and impacts are assessed. The analysis of the project's potential impacts as measured against the existing conditions baseline that follows is presented for information purposes only. The identification of the project's significant impacts, with recommended mitigation, will instead be based on the Opening Year (2027) and Horizon Year (2062) scenarios that take into account cumulative traffic growth, as well as the changing roadway network and land uses.

Roadway Improvements E+P Conditions

The lane configurations and traffic controls assumed to be in place for E+P conditions are largely identical with the Existing conditions, except that it is assumed that project driveways and those facilities constructed by the project to provide site access are also assumed to be in place for E+P conditions (e.g., intersection and roadway improvements at the project's frontage and driveways).

Intersection Level of Service – E+P Traffic Conditions

E+P peak hour traffic LOS has been evaluated for the study area intersections. The intersection LOS results are summarized in Table 4.5 of *Appendix G*, which indicate that the following intersections are anticipated to operate at an unacceptable LOS with the addition of project traffic under Existing Plus Project conditions.

- Britannia Boulevard & Airway Road – LOS E during the AM peak hour; and
- Continental Street & Airway Road – LOS E during the AM peak hour.

Table 7 Freeway Segment Analysis – Existing Conditions

Freeway	Segment	AADT[1]	Peak Hour	Direction[2]	# of Lanes	Capacity[3]	D	K	HVF	Peak Hour Volume	V/C	LOS[4]
SR-905	Caliente Ave and Heritage Rd	66,000	AM	EB	3M	7,050	68.25%	8.9%	17.54%	4,230	0.600	B
			PM	EB	3M	7,050	60.64%	10.5%	17.54%	4,440	0.630	B
	Heritage Rd and Britannia Blvd	66,000	AM	EB	3M	7,050	68.25%	8.9%	17.54%	4,230	0.600	B
			PM	EB	3M	7,050	60.64%	10.5%	17.54%	4,440	0.630	B
	Britannia Blvd and La Media Rd	54,000	AM	EB	3M+1A	8,460	68.25%	8.9%	17.54%	3,460	0.409	A
			PM	EB	3M+1A	8,460	60.64%	10.5%	17.54%	3,630	0.429	B

Notes:
M = Mainline. A = Auxiliary Lane.
[1] AADT = Annual Average Daily Traffic. AADT is provided by Caltrans Traffic Census Program (2021).
[2] In the direction of peak hour traffic. For SR-905, per Caltrans data, the peak hour direction is eastbound for both the AM and PM peak hours.
[3] The capacity is calculated as 2,350 ADT per main lane and 1,410 ADT (60% of the main lane capacity) per auxiliary lane.
[4] LOS during highest directional demand.
D = Directional split. | K = Peak hour %. | HVF = Heavy Vehicle Factor - consistent with the OMCPU. | V/C = Volume to Capacity Ratio
(CR Associates, 2026, Table 4.3)

Table 8 Project Trip Generation Summary

Land Use	Units	Daily Trip Rate	ADT	AM Peak Hour					PM Peak Hour				
				%	Trips	Split	In	Out	%	Trips	Split	In	Out
Multi-Family (Over 20 DU/acre)	985 DU	6/DU	5,910	8%	473	2:8	95	378	9%	532	7:3	373	159
Park (Developed)	3.5 Acres	50/ Acre	175	4%	7	5:5[1]	4	3	8%	14	5:5[1]	7	7
			6,085	**-**	**480**	**-**	**99**	**381**	**-**	**546**	**-**	**380**	**166**

Notes:
DU = Dwelling Unit
ADT = Average Daily Trips
[1] Peak hour splits for Park (Developed) land use are not provided within the City of San Diego Trip Generation Manual. Therefore, same split assumptions from the Otay Mesa Central Village Specific Plan Transportation Facilities Trigger Analysis for the Park (Developed) land use were utilized.
(CR Associates, 2026, Table 3.1)

Additionally, estimated ADT signal warrant analysis under Existing with Project conditions was conducted for intersections identified to be improved to a signalized intersection per the Otay Mesa CVSP Transportation Facilities Trigger Analysis with results as follows:

- Continental Street and Airway Road – A traffic signal is not warranted at this intersection under Existing with Project conditions;
- Cactus Road and Airway Road - A traffic signal is not warranted at this intersection under Existing with Project conditions; and
- Cactus Road and Street D - A traffic signal is not warranted at this intersection under Existing with Project conditions.

Roadway Segment Level of Service – E+P Traffic Conditions

E+P roadway segment LOS has been evaluated for the study area roadway segments. The roadway segment LOS results are summarized in Table 4.4 of *Appendix G*, which indicate that the following roadway segments are anticipated to operate at an unacceptable LOS with the addition of project traffic under Existing Plus Project conditions.

- Airway Road, between Continental Street and Britannia Boulevard is projected to operate at substandard LOS F with the addition of the project traffic;
- Airway Road, between Britannia Boulevard and 50 feet west of La Media Road is projected to operate at substandard LOS F with the addition of the project traffic; and
- Airway Road, between 50 feet west of La Media Road and La Media Road is projected to operate at substandard LOS F with the addition of the project traffic.

Ramp Metering Delay – E+P Traffic Conditions

Ramp meters are currently installed but not in operation within the project's study area. Therefore, ramp metering delay results are not included in this scenario.

Freeway Segment Level of Service – E+P Conditions

E+P traffic LOS has been evaluated for the study area freeway segments. All freeway segments within the study area operate at acceptable LOS B or better under Existing with Project conditions.

Opening Year (2027) without Project Conditions

Roadway Segment Analysis

As shown in Table 9, *Opening Year (2027) Roadway Segment Analysis Without Project Conditions*, roadway study segments are anticipated to operate at LOS D or better under Opening Year (2027) without project conditions with the exception of seven (7) roadway segments:

- Britannia Boulevard, between SR-905 EB Ramps and Airway Road – LOS F;
- Britannia Boulevard south of Airway Road – LOS F;
- Airway Road, between Cactus Road and Park Way – LOS F;
- Airway Road, between Park Way and Continental Street – LOS F;

Table 9 Opening Year (2027) Roadway Segment Analysis Without Project Conditions

Roadway	Segment	Functional Classification	Capacity (LOS E)	ADT	V/C	LOS
Otay Mesa Rd	West of Cactus Rd	6-Lane Prime Arterial	60,000	28,000	0.467	B
Otay Mesa Rd	Cactus Rd to Continental St	6-Lane Prime Arterial	60,000	30,370	0.506	B
Otay Mesa Rd	Continental St to Britannia Blvd	6-Lane Prime Arterial	60,000	31,460	0.524	B
Otay Mesa Rd	East of Britannia Blvd	6-Lane Prime Arterial	60,000	27,990	0.467	B
Britannia Blvd	Otay Mesa Rd to SR-905 WB Ramps	6-Lane Prime Arterial	60,000	33,550	0.559	B
Britannia Blvd	SR-905 WB Ramps to SR-905 EB Ramps	6-Lane Prime Arterial	60,000	51,380	0.856	D
Britannia Blvd	SR-905 EB Ramps to Airway Rd	5-Lane (2NB/3SB) Prime Arterial	50,000	69,700	1.394	**F**
Britannia Blvd	South of Airway Rd	3-Lane (1NB/2SB) Major Arterial	30,000	45,910	1.530	**F**
Airway Rd	Cactus Rd to Park Wy	2-Lane Collector	8,000	19,550	2.444	**F**
Airway Rd	Park Wy to Continental St	2-Lane Collector	8,000	19,550	2.444	**F**
Airway Rd	Continental St to Britannia Blvd	2-Lane Collector	8,000	23,130	2.891	**F**
Airway Rd	Britannia Blvd to 50 feet west of La Media Rd	2-Lane Collector	8,000	15,650	1.956	**F**
Airway Rd	50 feet west of La Media Rd to La Media Rd	4-Lane Major Arterial[1]	40,000	15,650	0.391	B
Cactus Rd	Street D to Airway Rd	2-Lane Collector	8,000	2,620	0.328	B
Cactus Rd	South of Airway Rd	2-Lane Collector	8,000	10,750	1.344	**F**
Continental St	Street D/Colchester Ct to Airway Rd	2-Lane Collector	8,000	3,220	0.403	B

(CR Associates, 2026, Table 5.2)

Notes:

[1] To be constructed by CIP # S-15018 La Media Road improvements project

ADT = Average Daily Traffic

V/C = Volume to Capacity Ratio

NB = Northbound

SB = Southbound

EB = Eastbound

WB = Westbound

Bold = LOS E or F

- Airway Road, between Continental Street and Britannia Boulevard – LOS F;
- Airway Road, between Britannia Boulevard and 50 feet west of La Media Road – LOS F ; and
- Cactus Road, south of Airway Road – LOS F.

Intersection Analysis

As shown in Table 10, *Opening Year (2027) Intersection Analysis Without Project Conditions*, study intersections are projected to operate at LOS D or better under Opening Year 2027 without project conditions, with the exception of the following five (5) intersections:

- Britannia Boulevard & SR-905 Westbound Ramps – LOS F during the PM peak hours;
- Britannia Boulevard & SR-905 Eastbound Ramps – LOS F during the AM and PM peak hours;
- Britannia Boulevard & Airway Road – LOS F during the AM and PM peak hours;
- Continental Street & Airway Road – LOS F during the AM and PM peak hours; and
- Cactus Road & Airway Road – LOS F during the AM and PM peak hours.

Additionally, estimated ADT signal warrant analysis under Opening Year 2027 without project conditions was conducted for intersections identified to be improved to a signalized intersection per the Otay Mesa CVSP Transportation Facilities Trigger Analysis Report (TFTA) with results as follows:

- Continental Street and Airway Road – A traffic signal is warranted at this intersection under Opening Year 2027 conditions; and
- Cactus Road and Airway Road - A traffic signal is warranted at this intersection under Opening Year 2027 conditions. However, per the California Manual on Uniform Control Devices (CAMUTCD), the satisfaction of a traffic signal warrant or warrants shall not in itself require the installation of a traffic control signal. Furthermore, Epoca (Otay Mesa Lumina PTS#555609) is conditioned to signalize this intersection per the approved traffic signal plan (Project #673439 Plan Set 42088-19-D).

Ramp Meter Analysis

As shown on Table 11, *Opening Year (2027) Freeway Ramp Analysis Without Project Conditions*, no freeway ramps in the study area would experience delays under Opening Year (2027) without project conditions.

Freeway Segment Analysis

As shown in Table 12, *Opening Year (2027) Freeway Segment Analysis Without Project Conditions*, freeway segments within the project study area would be expected to operate at acceptable LOS D or better under Opening Year (2027) without project conditions.

Table 10 Opening Year (2027) Intersection Analysis Without Project Conditions

#	Intersection	Control Type	AM Peak Hour		PM Peak Hour	
			Avg. Delay (sec)	LOS	Avg. Delay (sec)	LOS
1	Cactus Rd & Otay Mesa Rd	Signal	25.7	C	29.4	C
2	Continental St & Otay Mesa Rd	Signal	5.2	A	5.7	A
3	Britannia Blvd & Otay Mesa Rd	Signal	29.1	C	50.3	D
4	Britannia Blvd & SR-905 WB Ramps	Signal	31.5	C	84.2	**F**
5	Britannia Blvd & SR-905 EB Ramps	Signal	164.8	**F**	228.5	**F**
6	Britannia Blvd & Airway Rd	Signal	284.1	**F**	288.4	**F**
7	Continental St & Airway Rd[1]	SSSC	463.4	**F**	BCD	**F**
8	Cactus Rd & Airway Rd[1]	AWSC	162.5	**F**	436.7	**F**
9	La Media Rd & Airway Rd	Signal	30.3	C	29.4	C
14	Continental St & Colchester Ct	AWSC	6.9	A	6.6	A

(CR Associates, 2026, Table 5.3)

Notes:

[1] The estimated ADT signal warrant would be met for this intersection based on analyzed traffic volumes per the Average Traffic Estimate Form. Estimated ADT signal warrants are provided in Appendix I of the project's TIS.

AWSC = All-Way Stop-Controlled. For AWSC intersections, the delay shown is the average delay for the entire intersection.

SSSC = Side-Street Stop-Controlled. For SSSC intersections, the delay shown is the worst delay experienced by any of the movements.

BCD = Exceeds maximum reasonable calculable delay of 600 seconds per Synchro 11.0 traffic analysis software.

Bold = LOS E or F

Table 11 Opening Year (2027) Freeway Ramp Analysis Without Project Conditions

Location	Peak Hour	Total Demand[1] (veh/hr)	# of SOV Lanes	SOV Demand[2]	Meter Rate[3] (veh/hr/lane)	Excess Demand[4] (veh/hr/lane)	Delay[5] (min)	Queue[6] (ft)	Exceeds 15-minutes?
SR-905 WB On-ramp @ Britannia Blvd	AM	990	2	495	960	0	0	0	N
	PM	1,568	2	784	960	0	0	0	N
SR-905 EB On-ramp @ Britannia Blvd	AM	346	2	173	960	0	0	0	N
	PM	590	2	295	960	0	0	0	N

(CR Associates, 2026, Table 5.4)

Notes:

SOV = Single Occupancy Vehicle

[1] Total Demand is the peak hour demand for both SOV and HOV lanes expected to use the on-ramp.

[2] SOV Demand = (Total Demand – HOV Demand) / # of SOV Lanes.

[3] Meter Rate is the peak hour capacity expected to be processed through the ramp meter per lane. This value was obtained from Caltrans. The average between the "high" and "low" meter rate was used for this analysis.

[4] Excess Demand = (Demand) – (Meter Rate) or zero, whichever is greater.

[5] Delay = (Excess Demand / Meter Rate) X 60 min/hr.

[6] Queue = (Excess Demand) X 25 ft/veh. SOV volumes were used in the calculation of Queue. A zero represents no excess queue.

Table 12 Opening Year (2027) Freeway Segment Analysis Without Project Conditions

Freeway	Segment	AADT[1]	Peak Hour	Direction[2]	# of Lanes	Capacity[3]	D	K	HVF	Peak Hour Volume	V/C	LOS[4]
SR-905	Caliente Ave and Heritage Rd	88,400	AM	EB	3M	7,050	68.25%	8.9%	17.54%	5,670	0.804	D
			PM	EB	3M	7,050	60.64%	10.5%	17.54%	5,940	0.843	D
	Heritage Rd and Britannia Blvd	88,400	AM	EB	3M	7,050	68.25%	8.9%	17.54%	5,670	0.804	D
			PM	EB	3M	7,050	60.64%	10.5%	17.54%	5,940	0.843	D
	Britannia Blvd and La Media Rd	63,400	AM	EB	3M+1A	8,460	68.25%	8.9%	17.54%	4,070	0.481	B
			PM	EB	3M+1A	8,460	60.64%	10.5%	17.54%	4,260	0.504	B

(CR Associates, 2026, Table 5.5)

Notes:

M = Mainline. A = Auxiliary Lane.

[1] AADT = Annual Average Daily Traffic. AADT is provided by Caltrans Traffic Census Program (2021).

[2] In the direction of peak hour traffic. For SR-905, per Caltrans data, the peak hour direction is eastbound for both the AM and PM peak hours.

[3] The capacity is calculated as 2,350 ADT per main lane and 1,410 ADT (60% of the main lane capacity) per auxiliary lane.

[4] LOS during highest directional demand.

D = Directional split. | K = Peak hour %. | HVF = Heavy Vehicle Factor - consistent with the OMCPU. | V/C = Volume to Capacity Ratio

Opening Year (2027) with Project Conditions

Cumulative Development

A cumulative project list was developed and is included in Table 5.1 of *Technical Appendix G*. LOS calculations were conducted for the study area intersections, roadways, and freeway segments to evaluate their operations under Opening Year (2027) traffic conditions.

Opening Year (2027) with Project Roadway Segment Analysis

As shown in Table 13, *Roadway Segment Analysis for Opening Year (2027) with Project Conditions,* all the study roadway segments would continue to operate at LOS D or better within the study area, with the implementation of the project, except for the following seven (7) roadway segments:

- Britannia Boulevard, between SR-905 Eastbound Ramps and Airway Road (LOS F)
- Britannia Boulevard, south of Airway Road (LOS F);
- Airway Road, between Cactus Road and Park Way (LOS F);
- Airway Road, between Park Way and Continental Street (LOS F);
- Airway Road, between Continental Street and Britannia Boulevard (LOS F);
- Airway Road, between Britannia Boulevard and 50 feet west of La Media Road (LOS F); and
- Cactus Road, south of Airway Road (LOS F).

Although Britannia Boulevard, south of Airway Road is expected to operate at LOS F, the 0.008 increase in v/c (volume to capacity ratio) in the Opening Year (2027) with Project Conditions is within the allowable 0.01 v/c significance threshold; therefore, it would not be considered a direct significant impact. Additionally, although Airway Road, between Cactus Road, and Park Way and Airway Road, between Park Way and Continental Street, are expected to operate at LOS F, the v/c ratio is expected to be better than pre-project conditions due to the widening of Airway Road by the Project; therefore, these would not be considered direct significant impacts by the project.

Since implementation of the project would degrade LOS to unacceptable levels or further degrade traffic operations at study area roadway segments already operating at unacceptable LOS, mitigation measures would be required. The project would be subject to Mitigation Framework TRF-1, which requires intersection improvement per OMCPU designations. As shown in Table 14, *Roadway Segment Analysis (2027) with Project with Mitigation Conditions,* the significant impacts associated with the following four (4) roadway segments would be mitigated with the implementation of Mitigation Measures MM-9 through MM-12:

- Britannia Boulevard, between SR-905 Eastbound Ramps and Airway Road - The Project would improve this roadway segment from a 5-Lane Prime Arterial (2 lanes NB/3 lanes SB) to its ultimate classification as a 6-Lane Prime Arterial per the currently adopted Otay Mesa Community Plan under Opening Year 2027 with Project Conditions. With the implementation of MM-9, LOS is expected to remain at LOS F. The impact is considered significant and unavoidable, consistent with the OM CPU EIR;

- Airway Road, between Continental Street and Britannia Boulevard - The Project would improve this roadway segment from a 2-Lane Collector to a 3-Lane (1 lane EB/2 lanes WB)

Table 13 Roadway Segment Analysis for Opening Year (2027) with Project Conditions

Roadway	Segment	Functional Classification	Capacity (LOS E)	ADT	V/C	LOS	V/C w/o Project	LOS w/o Project	ΔV/C	SI?
Otay Mesa Rd	West of Cactus Rd	6-Lane Prime Arterial	60,000	28,730	0.479	B	0.467	B	0.012	N
Otay Mesa Rd	Cactus Rd to Continental St	6-Lane Prime Arterial	60,000	31,648	0.527	B	0.506	B	0.021	N
Otay Mesa Rd	Continental St to Britannia Blvd	6-Lane Prime Arterial	60,000	32,738	0.546	B	0.524	B	0.021	N
Otay Mesa Rd	East of Britannia Blvd	6-Lane Prime Arterial	60,000	28,842	0.481	B	0.467	B	0.014	N
Britannia Blvd	Otay Mesa Rd to SR-905 WB Ramps	6-Lane Prime Arterial	60,000	35,680	0.595	C	0.559	B	0.036	N
Britannia Blvd	SR-905 WB Ramps to SR-905 EB Ramps	6-Lane Prime Arterial	60,000	54,970	0.916	D	0.856	D	0.060	N
Britannia Blvd	SR-905 EB Ramps to Airway Rd	5-Lane (2NB/3SB) Prime Arterial	50,000	74,629	1.493	**F**	1.394	**F**	0.099	**Y**
Britannia Blvd	South of Airway Rd	3-Lane (2NB/1SB) Major Arterial	30,000	46,153	1.538	**F**	1.530	**F**	0.008	N
Airway Rd	Cactus Rd to Park Wy	3-Lane (1EB/2WB) Collector	11,000	20,524	1.866	**F**	2.444	**F**	-0.578	N
Airway Rd	Park Wy to Continental St	3-Lane (1EB/2WB) Collector	11,000	21,741	1.976	**F**	2.444	**F**	-0.468	N
Airway Rd	Continental St to Britannia Blvd	2-Lane Collector	8,000	28,972	3.622	**F**	2.891	**F**	0.730	**Y**
Airway Rd	Britannia Blvd to 50 feet west of La Media Rd	2-Lane Collector	8,000	16,259	2.032	**F**	1.956	**F**	0.076	**Y**
Airway Rd	50 feet west of La Media Rd to La Media Rd	4-Lane Major Arterial[1]	40,000	16,259	0.406	B	0.391	B	0.015	N
Cactus Rd	Street D to Airway Rd	3-Lane (2NB/1SB)	30,000	3,837	0.128	A	0.328	B	-0.200	N

Roadway	Segment	Functional Classification	Capacity (LOS E)	ADT	V/C	LOS	V/C w/o Project	LOS w/o Project	ΔV/C	SI?
		Major Arterial								
Cactus Rd	South of Airway Rd	2-Lane Collector	8,000	10,993	1.374	**F**	1.344	**F**	0.030	**Y**
Continental St	Street D / Colchester Ct to Airway Rd	2-Lane Collector w/ TWLTL	15,000	6,871	0.458	B	0.403	B	0.056	N

Note:
[1] To be constructed by CIP # S-15018 La Media Road improvements project
ADT = Average Daily Traffic
V/C = Volume to Capacity Ratio
TWLTL = Two-Way Left-Turn Lane
NB = Northbound
SB = Southbound
EB = Eastbound
WB = Westbound
Bold = LOS E or F
SI? = Significant Impact?
(CR Associates, 2026, Table 5.6)

Table 14 Roadway Segment Analysis (2027) with Project with Mitigation Conditions

Roadway	Segment	Before Mitigation					After Mitigation				
		Functional Classification	Capacity (LOS E)	ADT	V/C	LOS	Functional Classification	Capacity (LOS E)	ADT	V/C	LOS
Britannia Blvd	SR-905 EB Ramps to Airway Rd	5-Lane (2NB/3SB) Prime Arterial	50,000	74,629	1.493	**F**	6-Lane Prime Arterial	60,000	74,629	1.244	**F**
Airway Rd	Continental St to Britannia Blvd	2-Lane Collector	8,000	28,972	3.622	**F**	4-Lane (1EB/3WB) Collector	15,000	28,972	2.634	**F**
Airway Rd	Britannia Blvd to 50 feet west of La Media Rd	2-Lane Collector	8,000	16,259	2.032	**F**	2-Lane Collector w/ TWLTL	15,000	16,259	1.084	**F**
Cactus Rd	South of Airway Road	2-Lane Collector	8,000	10,993	1.374	**F**	3-Lane (1NB/2SB) Major Arterial	30,000	10,993	0.366	A

Notes:
Bold = LOS E or F
V/C = Volume to Capacity Ratio
(CR Associates, 2026, Table 7.1)

Collector under Opening Year 2027 Plus Project. With this improvement, LOS is expected to remain at LOS F under the Opening Year 2027 Plus Project scenario, however, the roadway segment would operate at better than pre-project conditions; therefore, the project's significant impact would be mitigated with the implementation of MM-10.

It should be noted that Airway Road between Cactus Road and Continental Street is identified as a 6-lane urban major per the CVSP and Airway Road between Cactus Road and Britannia Boulevard as a 6-lane major arterial per the Otay Mesa Community Plan. Based on uncertainty regarding the timing of implementation of frontage improvements by the property on the south side of Airway Road between Cactus Road and Britanna Boulevard, the improvements included in MM-10 would be interim improvements to improve the LOS prior to implementation of the adjacent project;

- Airway Road, between Britannia Boulevard and 50 feet west of La Media Road – The project would improve this roadway segment from a 2-lane collector to a 2-lane collector with a two-way center left turn lane. With this improvement, LOS is expected to remain at LOS F under the Opening Year 2027 Plus Project Scenario. This roadway segment would operate at LOS F which exceeds the LOS D threshold. However, since the roadway segment would operate at better than pre-project conditions, the project's significant impact would be mitigated with implementation of MM-11; and

- Cactus Road, south of Airway Road – The project would improve this roadway segment from a 2-lane collector to a 3-lane (1 lane NB/2 lanes SB) major arterial. With this improvement, the roadway segment is expected to operate at LOS A; therefore, the project's significant impact would be mitigated with implementation of MM-12.

  It should be noted that the improvements identified as part of MM-12 are anticipated to be constructed by the Epoca residential development, previously known as Otay Mesa PTS#555609. However, should Epoca not complete the improvement to Cactus Road south of Airway Road before the issuance of any building permit for the project, the project would implement the improvements.

Opening Year (2027) with Project Intersection Analysis

As shown in Table 15, *Intersection Analysis for Opening Year (2027) with Project Conditions*, the study area intersections with project conditions are anticipated to operate at LOS D or better with the implementation of the project, except for the following six (6) intersections:

- Britannia Boulevard & Otay Mesa Road (LOS E during the PM peak hour);
- Britannia Boulevard & SR-905 Westbound Ramps (LOS F during the PM peak hour);
- Britannia Boulevard & SR-905 Eastbound Ramps (LOS F during both the AM and PM peak hours);
- Britannia Boulevard & Airway Road (LOS F during both the AM and PM peak hours);
- Continental Street & Airway Road (LOS F during both the AM and PM peak hours);and
- Cactus Road & Airway Road (LOS F during both the AM and PM peak hours).

Table 15 Intersection Analysis for Opening Year (2027) with Project Conditions

#	Intersection	Control Type	AM Peak Hour		PM Peak Hour		Delay w/o Project AM/PM	LOS w/o Project AM/PM	Δ in Delay AM/PM	SI?
			Avg. Delay (sec)	LOS	Avg. Delay (sec)	LOS				
1	Cactus Rd & Otay Mesa Rd	Signal	26.4	C	30.5	C	25.7 / 29.4	C / C	0.7 / 1.1	N
2	Continental St & Otay Mesa Rd	Signal	5.7	A	5.9	A	5.2 / 5.7	A / A	0.5 / 0.2	N
3	Britannia Blvd & Otay Mesa Rd	Signal	31.2	C	69.4	**E**	29.1 / 50.3	C / D	2.1 / 19.1	**Y**
4	Britannia Blvd & SR-905 WB Ramps	Signal	36.4	D	112.7	**F**	31.5 / 84.2	C / **F**	4.9 / 28.5	**Y**
5	Britannia Blvd & SR-905 EB Ramps	Signal	213.3	**F**	268.1	**F**	164.8 / 228.5	**F / F**	48.5 / 39.6	**Y**
6	Britannia Blvd & Airway Rd	Signal	368.6	**F**	372.3	**F**	284.1 / 288.4	**F / F**	84.5 / 83.9	**Y**
7	Continental St & Airway Rd[1]	SSSC	BCD	**F**	BCD	**F**	463.4 / BCD	**F / F**	BCD / BCD	**Y**
8	Cactus Rd & Airway Rd[1,2]	AWSC	226.0	**F**	BCD	**F**	162.5 / 436.7	**F / F**	63.5 / BCD	**Y**
9	La Media Rd & Airway Rd	Signal	39.2	D	35.0	C	30.3 / 29.4	C / C	8.9 / 5.6	N
10	Park Wy & Airway Rd	SSSC	13.0	B	25.3	D	DNE	DNE	13.0 / 25.3	N
11	Cactus Rd & Street D[3,4]	SSSC	16.9	C	20.0	C	DNE	DNE	16.9 / 20.0	N
12	Cactus Rd & PA-11 Secondary Dwy	SSSC	10.4	B	10.6	B	DNE	DNE	10.4 / 10.6	N
13	Park Wy & Street D	SSSC	9.0	A	9.1	A	DNE	DNE	9.0 / 9.1	N
14	Continental St/PA-12 Secondary Dwy & Street D/Colchester Ct	AWSC	7.8	A	8.0	A	6.9 / 6.6	A / A	0.9 / 1.4	N

15	Park Wy & PA-10/PA-13 Primary Dwy	SSSC	8.9	A	9.4	A	DNE	DNE	8.9 / 9.4	N

Notes:

[1] The estimated ADT signal warrant would be met for this intersection based on analyzed traffic volumes per the Average Traffic Estimate Form. Estimated ADT signal warrants are provided in Appendix I of the TIS.

[2] If the Proposed Project constructs full pavement width, but receiving lanes would not be available, the "extra width" would not be striped as a travel lane.

[3] The estimated ADT signal warrant would not be met for this intersection based on analyzed traffic volumes per the Average Traffic Estimate Form. Estimated ADT signal warrants are provided in Appendix I of the project's TIS.

[4] The take off point for the future SR-905 overcrossing would be just south of Street "D" and the Opening Year 2027 with Project estimated vehicular volumes do not assume the overcrossing.

AWSC = All-Way Stop-Controlled. For AWSC intersections, the delay shown is the average delay for the entire intersection.

SSSC = Side-Street Stop-Controlled. For SSSC intersections, the delay shown is the worst delay experienced by any of the movements.

BCD = Exceeds maximum reasonable calculable delay of 600 seconds per Synchro 11.0 traffic analysis software.

DNE = Does Not Exist

Bold = LOS E or F

SI? = Significant Impact?

(CR Associates, 2026, Table 5.7)

Since implementation of the project would degrade LOS to unacceptable levels or further degrade traffic operations at study area intersections already operating as unacceptable LOS, mitigation measures would be required. The project would be subject to Mitigation Framework TRF-1, which requires intersection improvement per OMCPU designations. As shown in Table 16, *Intersection Analysis for Opening Year (2027) with Project with Mitigation Conditions*, all study area intersections would operate at LOS D or better or better than pre-project conditions with implementation of the recommended project-specific Mitigation Measures MM-3 through MM-8. These recommended mitigation measures are consistent with the lane configurations per OMCPU Mitigation Framework TRF-1 and the CVSP TFTA.

Opening Year (2027) Project Ramp Meter Analysis

Table 17, *Freeway Ramp Meter Analysis for Opening Year (2027) with Project Conditions*, displays ramp meter analysis results for the study area locations under Opening Year (2027) with project conditions. As shown, none of the freeway on-ramps would experience delays under these conditions.

Opening Year (2027) Project Freeway Segment Analysis

Table 18, *Freeway Segment Analysis for Opening Year (2027) with Project Conditions,* displays freeway segment level of service results for the study area freeway mainline facilities under Opening Year 2027 with project conditions. As shown, all the freeway segments within the study area operate at acceptable LOS D or better. Based upon the significance criteria, all study freeway mainline facilities would not be significantly impacted under Opening Year 2027 with project conditions and mitigation measures would not be required.

Horizon Year (2062) without Project Conditions

Intersection Analysis

Table 19, *Horizon Year (2062) Intersection Conditions without Project,* displays the intersection LOS for the project study area intersections under Horizon Year 2062 without project conditions. As shown, the project study areas are projected to operate at LOS D or better during both the AM and PM peak hours under Horizon 2062 without project conditions, except for the following five (5) intersections:

- Britannia Boulevard & SR-905 Westbound Ramps – LOS F during the PM peak hour;
- Britannia Boulevard & SR-905 Eastbound Ramps – LOS F during both the AM and PM peak hours;
- Britannia Boulevard & Airway Road – LOS F during both the AM and PM peak hours;
- Continental Street & Airway Road – LOS F during both the AM and PM Peak hours; and
- Cactus Road & Airway Road – LOS F during both the AM and PM peak hours.

Additionally, estimated ADT signal warrant analysis under Horizon Year 2062 without project conditions was conducted for intersections identified to be improved to a signalized intersection per the Otay Mesa CVSP TFTA with results as follows:

Table 16 Intersection Analysis for Opening Year (2027) with Project with Mitigation Conditions

#	Intersection	Control Type	Without Project				With Project Before Mitigation				With Project After Mitigation				Δ in Delay AM/PM[2]	Δ in Delay AM/PM[3]
			AM Peak Hour		PM Peak Hour		AM Peak Hour		PM Peak Hour		AM Peak Hour		PM Peak Hour			
			Avg. Delay (sec)	LOS	Avg. Delay (sec)	LOS	Avg. Delay (sec)	LOS	Avg. Delay (sec)	LOS	Avg. Delay (sec)	LOS	Avg. Delay (sec)	LOS		
3	Britannia Blvd & Otay Mesa Rd	Signal	29.1	C	50.3	D	31.2	C	69.4	**E**	22.9	C	35.7	D	-6.2 / -14.6	-8.3 / -33.7
4	Britannia Blvd & SR-905 WB Ramps	Signal	31.5	C	84.2	**F**	36.4	D	112.7	**F**	27.0	C	83.7	**F**	-4.4 / -0.5	-9.4 / -29.0
5	Britannia Blvd & SR-905 EB Ramps	Signal	164.8	**F**	228.5	**F**	213.3	**F**	268.1	**F**	125.9	**F**	163.0	**F**	-38.9 / -65.5	-87.4 / -105.1
6	Britannia Blvd & Airway Rd	Signal	284.1	**F**	288.4	**F**	368.6	**F**	372.3	**F**	258.4	**F**	243.3	**F**	-25.7 / -45.1	-110.2 / -129.0
7	Continental St & Airway Rd	Signal[1]	463.4	**F**	BCD	**F**	BCD	**F**	BCD	**F**	43.6	D	11.9	B	-419.8 / BCD	BCD / BCD
8	Cactus Rd & Airway Rd	AWSC[4]	162.5	**F**	436.7	**F**	226.0	**F**	BCD	**F**	152.1	**F**	158.2	**F**	-10.4 / -278.5	-73.9 / BCD

Notes:
[1] Improved from existing side-street stop-controlled intersection to a signalized intersection
[2] Delay under With Project After Mitigation Conditions – Delay under Without Project Conditions
[3] Delay under With Project After Mitigation Conditions – Delay under With Project Before Mitigation Conditions
Bold = LOS E or F
AWSC = All-Way Stop-Control
BCD = Exceeds maximum reasonable calculable delay of 600 seconds per Synchro 11.0 traffic analysis software.
(CR Associates, 2026, Table 7.2)

Table 17 Freeway Ramp Meter Analysis for Opening Year (2027) with Project Conditions

Location	Peak Hour	Total Demand[1] (veh/hr)	# of SOV Lanes	SOV Demand[2]	Meter Rate[3] (veh/hr/lane)	Excess Demand[4] (veh/hr/lane)	Delay[5] (min)	Queue[6] (ft)	Exceeds 15-minutes?	Delay[5] w/o Project (min)	Queue[6] w/o Project (ft)	SI?
SR-905 WB On-ramp @ Britannia Blvd	AM	1,116	2	558	960	0	0	0	N	0	0	N
	PM	1,623	2	812	960	0	0	0	N	0	0	N
SR-905 EB On-ramp @ Britannia Blvd	AM	396	2	198	960	0	0	0	N	0	0	N
	PM	613	2	307	960	0	0	0	N	0	0	N

(CR Associates, 2026, Table 5.8)

Notes:

SOV = Single Occupancy Vehicle

[1] Total Demand is the peak hour demand for both SOV and HOV lanes expected to use the on-ramp.

[2] SOV Demand = (Total Demand – HOV Demand) / # of SOV Lanes.

[3] Meter Rate is the peak hour capacity expected to be processed through the ramp meter per lane. This value was obtained from Caltrans. The average between the "high" and "low" meter rate was used for this analysis.

[4] Excess Demand = (Demand) – (Meter Rate) or zero, whichever is greater.

[5] Delay = (Excess Demand / Meter Rate) X 60 min/hr.

[6] Queue = (Excess Demand) X 25 ft/veh. SOV volumes were used in the calculation of Queue. A zero represents no excess queue.

SI? = Significant Impact?

Table 18 Freeway Segment Analysis for Opening Year (2027) with Project Conditions

Freeway	Segment	AADT[1]	Peak Hour	Direction[2]	# of Lanes	Capacity[3]	D	K	HVF	Peak Hour Volume	V/C	LOS[4]	V/C w/o Project	LOS w/o Project	Δ V/C Ratio	SI?
SR-905	Caliente Ave and Heritage Rd	90,408	AM	EB	3M	7,050	68.25%	8.9%	17.54%	5,800	0.823	D	0.804	D	0.018	N
			PM	EB	3M	7,050	60.64%	10.5%	17.54%	6,080	0.862	D	0.843	D	0.020	N
	Heritage Rd and Britannia Blvd	90,408	AM	EB	3M	7,050	68.25%	8.9%	17.54%	5,800	0.823	D	0.804	D	0.018	N
			PM	EB	3M	7,050	60.64%	10.5%	17.54%	6,080	0.862	D	0.843	D	0.020	N
	Britannia Blvd and La Media Rd	64,191	AM	EB	3M+1A	8,460	68.25%	8.9%	17.54%	4,120	0.487	B	0.481	B	0.006	N
			PM	EB	3M+1A	8,460	60.64%	10.5%	17.54%	4,310	0.509	B	0.504	B	0.006	N

M = Mainline. A = Auxiliary Lane.
[1] AADT = Annual Average Daily Traffic. AADT is provided by Caltrans Traffic Census Program (2021).
[2] In the direction of peak hour traffic. For SR-905, per Caltrans data, the peak hour direction is eastbound for both the AM and PM peak hours.
[3] The capacity is calculated as 2,350 ADT per main lane and 1,410 ADT (60% of the main lane capacity) per auxiliary lane.
[4] LOS during highest directional demand.
D = Directional split. | K = Peak hour %. | HVF = Heavy Vehicle Factor - consistent with the OMCPU. | V/C = Volume to Capacity Ratio
SI? = Significant Impact?
(CR Associates, 2026, Table 5.9)

Table 19 Horizon Year (2062) Intersection Conditions without Project

#	Intersection	Control Type	AM Peak Hour		PM Peak Hour	
			Avg. Delay (sec)	LOS	Avg. Delay (sec)	LOS
1	Cactus Rd & Otay Mesa Rd	Signal	34.2	C	36.5	D
2	Continental St & Otay Mesa Rd	Signal	6.3	A	8.9	A
3	Britannia Blvd & Otay Mesa Rd	Signal	32.2	C	54.4	D
4	Britannia Blvd & SR-905 WB Ramps	Signal	36.1	D	90.3	**F**
5	Britannia Blvd & SR-905 EB Ramps	Signal	187.7	**F**	252.1	**F**
6	Britannia Blvd & Airway Rd	Signal	323.9	**F**	326.0	**F**
7	Continental St & Airway Rd[1]	SSSC	529.1	**F**	BCD	**F**
8	Cactus Rd & Airway Rd[1]	AWSC	176.0	**F**	507.3	**F**
9	La Media Rd & Airway Rd	Signal	39.5	D	38.4	D
14	Continental St & Colchester Ct	AWSC	6.9	A	6.7	A

Notes:
[1] The estimated ADT signal warrant would be met for this intersection based on analyzed traffic volumes per the Average Traffic Estimate Form. Estimated ADT signal warrants are provided in Appendix I.
AWSC = All-Way Stop-Controlled. For AWSC intersections, the delay shown is the average delay for the entire intersection.
SSSC = Side-Street Stop-Controlled. For SSSC intersections, the delay shown is the worst delay experienced by any of the movements.
BCD = Exceeds maximum reasonable calculable delay of 600 seconds per Synchro 11.0 traffic analysis software.
Bold = LOS E or F
(CR Associates, 2026, Table 6.2)

- Continental Street and Airway Road – A traffic signal is warranted at this intersection under Horizon Year 2062 conditions; and
- Cactus Road and Airway Road - A traffic signal is warranted at this intersection under Horizon Year 2062 conditions. However, per CAMUTCD, the satisfaction of a traffic signal warrant or warrants shall not in itself require the installation of a traffic control signal; Furthermore, Epoca (Otay Mesa Lumina PTS#555609) is conditioned to signalize this intersection per traffic signal plan (Project #673439 Plan Set 42088-19-D).

Roadway Segment Analysis

Table 20, *Horizon Year (2062) Roadway Segment Conditions without Project*, displays the daily roadway LOS for study roadway segments under Horizon Year (2062) without project conditions. As shown, all project study area roadway segments are projected to operate at LOS D or better Under Horizon Year (2062) without project conditions, except for the following eight (8) roadway segments:

- Britannia Boulevard, between SR-905 WB Ramps and SR-905 EB Ramps – LOS E;
- Britannia Boulevard, between SR-905 EB Ramps and Airway Road – LOS F;
- Britannia Boulevard south of Airway Road – LOS F;
- Airway Road, between Cactus Road and Park Way – LOS F;
- Airway Road, between Park Way and Continental Street – LOS F;
- Airway Road, between Continental Street and Britannia Boulevard – LOS F;
- Airway Road, between Britannia Boulevard and 50 feet west of La Media Road – LOS F; and
- Cactus Road, south of Airway Road – LOS F.

Table 20 Horizon Year (2062) Roadway Segment Conditions without Project

Roadway	Segment	Functional Classification	Capacity (LOS E)	ADT	V/C	LOS
Otay Mesa Rd	West of Cactus Rd	6-Lane Prime Arterial	60,000	36,520	0.609	C
Otay Mesa Rd	Cactus Rd to Continental St	6-Lane Prime Arterial	60,000	38,890	0.648	C
Otay Mesa Rd	Continental St to Britannia Blvd	6-Lane Prime Arterial	60,000	39,980	0.666	C
Otay Mesa Rd	East of Britannia Blvd	6-Lane Prime Arterial	60,000	36,510	0.609	C
Britannia Blvd	Otay Mesa Rd to SR-905 WB Ramps	6-Lane Prime Arterial	60,000	33,650	0.561	B
Britannia Blvd	SR-905 WB Ramps to SR-905 EB Ramps	6-Lane Prime Arterial	60,000	58,380	0.973	**E**
Britannia Blvd	SR-905 EB Ramps to Airway Rd	5-Lane (2NB/3SB) Prime Arterial	50,000	73,200	1.464	**F**
Britannia Blvd	South of Airway Rd	3-Lane (1NB/2SB) Major Arterial	30,000	63,670	2.122	**F**
Airway Rd	Cactus Rd to Park Wy	2-Lane Collector	8,000	20,680	2.585	**F**
Airway Rd	Park Wy to Continental St	2-Lane Collector	8,000	20,680	2.585	**F**
Airway Rd	Continental St to Britannia Blvd	2-Lane Collector	8,000	26,760	3.345	**F**
Airway Rd	Britannia Blvd to 50 feet west of La Media Rd	2-Lane Collector	8,000	23,310	2.914	**F**
Airway Rd	50 feet west of La Media Rd toLa Media Rd	4-Lane Major Arterial[1]	40,000	23,310	0.583	C
Cactus Rd	Street D to Airway Rd	2-Lane Collector	8,000	6,120	0.765	D
Cactus Rd	South of Airway Rd	2-Lane Collector	8,000	14,390	1.799	**F**
Continental St	Street D/Colchester Ct to Airway Rd	2-Lane Collector	8,000	3,380	0.423	B

Notes:
[1] To be constructed by CIP # S-15018 La Media Road improvements project
ADT = Average Daily Traffic
V/C = Volume to Capacity Ratio
NB = Northbound
SB = Southbound
EB = Eastbound
WB = Westbound
Bold = LOS E or F
(CR Associates, 2026, Table 6.1)

Ramp Meter Analysis

Table 21, *Horizon Year (2062) Ramp Meter Analysis without Project*, displays ramp meter analysis results for the project study area locations under Horizon Year (2062) without project conditions. As shown, no freeway on-ramps in the study area would experience delays under Horizon Year (2062) without project conditions.

Table 21 Horizon Year (2062) Ramp Meter Analysis without Project

Location	Peak Hour	Total Demand[1] (veh/hr)	# of SOV Lanes	SOV Demand[2]	Meter Rate[3] (veh/hr/lane)	Excess Demand[4] (veh/hr/lane)	Delay[5] (min)	Queue[6] (ft)	Exceeds 15-minutes?
SR-905 WB On-ramp @ Britannia Blvd	AM	1,110	2	555	960	0	0	0	N
	PM	1,660	2	830	960	0	0	0	N
SR-905 EB On-ramp @ Britannia Blvd	AM	500	2	250	960	0	0	0	N
	PM	710	2	355	960	0	0	0	N

Notes:
[1] Total Demand is the peak hour demand for both SOV and HOV lanes expected to use the on-ramp.
[2] SOV Demand = (Total Demand – HOV Demand) / # of SOV Lanes.
[3] Meter Rate is the peak hour capacity expected to be processed through the ramp meter per lane. This value was obtained from Caltrans. The average between the "high" and "low" meter rate was used for this analysis.
[4] Excess Demand = (Demand) – (Meter Rate) or zero, whichever is greater.
[5] Delay = (Excess Demand / Meter Rate) X 60 min/hr.
[6] Queue = (Excess Demand) X 25 ft/veh. SOV volumes were used in the calculation of Queue. A zero represents no excess queue.
(CR Associates, 2026, Table 6.3)

Freeway Segment Conditions

Table 22, *Horizon Year (2062) Freeway Segment Conditions without Project,* displays freeway segment LOS results for the project study area freeway mainline facilities under Horizon Year (2062) without project conditions. As shown, all freeway segments within the study area would operate at unacceptable LOS F under Horizon Year (2062) conditions.

Horizon Year (2062) with Project Conditions

Intersection Analysis

Table 23, *Intersection Analysis for Horizon Year (2062) with Project Conditions,* displays the intersection LOS for the Project study area intersections under Horizon Year 2062 with Project conditions. As shown, the study area intersections are project to operate at LOS D or better during both the AM and PM peak hours under Horizon Year with Project conditions, except the following six (6) intersections:

- Britannia Boulevard & Otay Mesa Road (LOS E during the PM peak hour);
- Britannia Boulevard & SR-905 Westbound Ramps (LOS F during the PM peak hour);
- Britannia Boulevard & SR-905 Eastbound Ramps (LOS F during both the AM and PM peak hours);
- Britannia Boulevard & Airway Road (LOS F during both the AM and PM peak hours);
- Cactus Road & Airway Road (LOS F during both the AM and PM peak hours); and
- Continental Street & Airway Road (LOS F during both the AM and PM peak hours).

Since implementation of the project would degrade LOS to unacceptable levels or further degrade traffic operations at study area intersections already operating as unacceptable LOS, mitigation measures would be required. As shown in Table 24, *Intersection Analysis for Horizon Year (2062) with Project with Mitigation Conditions,* following implementation of Mitigation Measures MM-3 through MM-8, all study area intersections would operate at LOS D or better than pre-project conditions with

Table 22 Horizon Year (2062) Freeway Segment Conditions without Project

Freeway	Segment	AADT[1]	Peak Hour	Direction[2]	# of Lanes	Capacity[3]	D	K	HVF	Peak Hour Volume	V/C	LOS[4]
SR-905	Caliente Ave and Heritage Rd	194,000	AM	EB	3M	7,050	68.25%	8.9%	17.54%	12,430	1.763	**F**
			PM	EB	3M	7,050	60.64%	10.5%	17.54%	13,030	1.848	**F**
	Heritage Rd and Britannia Blvd	171,000	AM	EB	3M	7,050	68.25%	8.9%	17.54%	10,960	1.555	**F**
			PM	EB	3M	7,050	60.64%	10.5%	17.54%	11,490	1.630	**F**
	Britannia Blvd and La Media Rd	153,300	AM	EB	3M+1A	8,460	68.25%	8.9%	17.54%	9,820	1.161	**F**
			PM	EB	3M+1A	8,460	60.64%	10.5%	17.54%	10,300	1.217	**F**

Notes:
M = Mainline. A = Auxiliary Lane.
[1] AADT = Annual Average Daily Traffic. AADT is provided by Caltrans Traffic Census Program (2021).
[2] In the direction of peak hour traffic. For SR-905, per Caltrans data, the peak hour direction is eastbound for both the AM and PM peak hours.
[3] The capacity is calculated as 2,350 ADT per main lane and 1,410 ADT (60% of the main lane capacity) per auxiliary lane.
[4] LOS during highest directional demand.
D = Directional split. | K = Peak hour %. | HVF = Heavy Vehicle Factor - consistent with the OMCPU. | V/C = Volume to Capacity Ratio
Bold = LOS E or F
(CR Associates, 2026, Table 6.4)

Table 23 Intersection Analysis for Horizon Year (2062) with Project Conditions

#	Intersection	Control Type	AM Peak Hour		PM Peak Hour		Delay w/o Project AM/PM	LOS w/o Project AM/PM	Δ in Delay AM/PM	SI?
			Avg. Delay (sec)	LOS	Avg. Delay (sec)	LOS				
1	Cactus Rd & Otay Mesa Rd	Signal	34.4	C	36.7	D	34.2 / 36.5	C / D	0.2 / 0.2	N
2	Continental St & Otay Mesa Rd	Signal	7.2	A	9.6	A	6.3 / 8.9	A / A	0.9 / 0.7	N
3	Britannia Blvd & Otay Mesa Rd	Signal	39.1	D	70.3	**E**	32.2 / 54.4	C / D	6.9 / 15.9	**Y**
4	Britannia Blvd & SR-905 WB Ramps	Signal	44.0	D	121.2	**F**	36.1 / 90.3	D / F	7.9 / 30.9	**Y**
5	Britannia Blvd & SR-905 EB Ramps	Signal	235.5	**F**	293.2	**F**	187.7 / 252.1	**F / F**	47.8 / 41.1	**Y**
6	Britannia Blvd & Airway Rd	Signal	398.9	**F**	403.4	**F**	323.9 / 326.0	**F / F**	75.0 / 77.4	**Y**
7	Continental St & Airway Rd[1]	SSSC	BCD	**F**	BCD	**F**	529.1 / BCD	**F / F**	BCD / BCD	**Y**
8	Cactus Rd & Airway Rd[1,2]	AWSC	227.2	**F**	584.3	**F**	176.0 / 507.3	**F / F**	51.2 / 77.0	**Y**
9	La Media Rd & Airway Rd	Signal	40.4	D	38.8	D	39.5 / 38.4	D / D	0.9 / 0.4	N
10	Park Wy & Airway Rd	SSSC	13.1	B	28.5	D	DNE	DNE	13.1 / 28.5	N
11	Cactus Rd & Street D[3,4]	SSSC	15.4	C	19.6	C	DNE	DNE	15.4 / 19.6	N
12	Cactus Rd & PA-11 Secondary Dwy	SSSC	9.9	A	10.6	B	DNE	DNE	9.9 / 10.6	N
13	Park Wy & Street D	SSSC	9.0	A	9.1	A	DNE	DNE	9.0 / 9.1	N
14	Continental St/PA-12 Secondary Dwy & Street D/Colchester Ct	AWSC	7.9	A	8.0	A	6.9 / 6.7	A / A	1.0 / 1.3	N

15	Park Wy & PA-10/PA-13 Primary Dwy	SSSC	8.9	A	9.4	A	DNE	DNE	8.9 / 9.4	N

Notes:
[1] The estimated ADT signal warrant would be met for this intersection based on analyzed traffic volumes per the Average Traffic Estimate Form. Estimated ADT signal warrants are provided in Appendix I of the TIS.
[2] If the Proposed Project constructs full pavement width, but receiving lanes would not be available, the "extra width" would not be striped as a travel lane.
[3]The estimated ADT signal warrant would not be met for this intersection based on analyzed traffic volumes per the Average Traffic Estimate Form. Estimated ADT signal warrants are provided in Appendix I.
[4] The take off point for the future SR-905 overcrossing would be just south of Street D and the Horizon Year 2062 with Project estimated vehicular volumes do not assume the overcrossing.
AWSC = All-Way Stop-Controlled. For AWSC intersections, the delay shown is the average delay for the entire intersection.
SSSC = Side-Street Stop-Controlled. For SSSC intersections, the delay shown is the worst delay experienced by any of the movements.
BCD = Exceeds maximum reasonable calculable delay of 600 seconds per Synchro 11.0 traffic analysis software.
DNE = Does Not Exist
Bold = LOS E or F
SI? = Significant Impact?
(CR Associates, 2026, Table 6.6)

Table 24 Intersection Analysis for Horizon Year (2062) with Project with Mitigation Conditions

#	Intersection	Control Type	Without Project				With Project Before Mitigation				With Project After Mitigation				Δ in Delay AM/PM[2]	Δ in Delay AM/PM[3]
			AM Peak Hour		PM Peak Hour		AM Peak Hour		PM Peak Hour		AM Peak Hour		PM Peak Hour			
			Avg. Delay (sec)	LOS	Avg. Delay (sec)	LOS	Avg. Delay (sec)	LOS	Avg. Delay (sec)	LOS	Avg. Delay (sec)	LOS	Avg. Delay (sec)	LOS		
3	Britannia Blvd & Otay Mesa Rd	Signal	32.2	C	54.4	D	39.1	D	70.3	**E**	27.3	C	38.0	D	-4.9 / -16.4	-11.8 / -32.3
4	Britannia Blvd & SR-905 WB Ramps	Signal	36.1	D	90.3	**F**	44.0	D	121.2	**F**	31.9	C	89.4	**F**	-4.2 / -0.9	-12.1 / -31.8
5	Britannia Blvd & SR-905 EB Ramps	Signal	187.7	**F**	252.1	**F**	235.5	**F**	293.2	**F**	142.3	**F**	182.9	**F**	-45.4 / -69.2	-93.2 / -110.3
6	Britannia Blvd & Airway Rd	Signal	323.9	**F**	326.0	**F**	398.9	**F**	403.4	**F**	300.5	**F**	282.0	**F**	-23.4 / -44.0	-98.4 / -121.4
7	Continental St & Airway Rd	Signal[1]	529.1	**F**	BCD	**F**	BCD	**F**	BCD	**F**	42.4	D	19.7	B	-486.7 / BCD	BCD / BCD
8	Cactus Rd & Airway Rd	AWSC[4]	176.0	**F**	507.3	**F**	227.2	**F**	584.3	**F**	140.0	**F**	236.3	**F**	-36.0 / -271.0	-87.2 / -348.0

Notes:
[1] Improved from existing side-street stop-controlled intersection to a signalized intersection
[2] Delay under With Project After Mitigation Conditions – Delay under Without Project Conditions
[3] Delay under With Project After Mitigation Conditions – Delay under With Project Before Mitigation Conditions
Bold = LOS E or F
AWSC = All-Way Stop-Control
BCD = Exceeds maximum reasonable calculable delay of 600 seconds per Synchro 11.0 traffic analysis software.
(CR Associates, 2026, Table 7.4)

implementation of the recommended mitigation measures. These recommended mitigation measures are consistent with the lane configurations per OMCPU Mitigation Framework TRF-1 and the CVSP TFTA.

Roadway Segment Analysis

Table 25, *Roadway Segment Analysis for Horizon Year (2062) with Project Conditions,* displays the daily roadway LOS for study roadway segments under Horizon Year 2062 with project conditions. As shown, all study roadway segments would operate at LOS C or better under Horizon Year 2062 with project conditions, with the exception of the following eight (8) roadway segments:

- Britannia Boulevard, between SR-905 WB Ramps to SR-905 EB Ramps (LOS F);
- Britannia Boulevard, between SR-905 Eastbound Ramps and Airway Road (LOS F);
- Britannia Boulevard south of Airway Road (LOS F);
- Airway Road, between Cactus Road and Park Way (LOS F);
- Airway Road, between Park Way and Continental Street (LOS F);
- Airway Road, between Continental Street and Britannia Boulevard (LOS F);
- Airway Road, between Britannia Boulevard and 50 feet west of La Media Road (LOS F); and
- Cactus Road, south of Airway Road (LOS F).

Although Britannia Boulevard, south of Airway Road is expected to operate at LOS F, the 0.008 increase in v/c in the Horizon Year (2062) is within the allowable 0.01 v/c significance threshold; therefore, it would not be considered a significant impact. Additionally, although Airway Road, between Cactus Road and Park Way, and Airway Road, between Park Way and Continental Street, are expected to operate at LOS F, the v/c ratio is expected to be better than pre-project conditions due to the widening of Airway Road by the Project; therefore, these would not be considered significant impacts by the project.

Since implementation of the project would degrade LOS to unacceptable levels or further degrade traffic operations at study area roadway segments already operating at an unacceptable LOS, mitigation measures would be required by the project for its cumulative impacts. As shown in Table 26, *Roadway Segment Analysis Horizon Year (2062) with Project with Mitigation Conditions*, following implementation Mitigation Measures MM-9 through MM-12, all study area intersections would operate at LOS D or better or better than pre-project conditions.

- Britannia Boulevard, between SR-905 Westbound Ramps and SR-905 Eastbound Ramps – This roadway segment is expected to operate at LOS F with the addition of project traffic and the OMCPU EIR disclosed its operations as LOS F. This roadway is currently built to its ultimate classification as a 6-Lane Prime Arterial as identified in the currently adopted Otay Mesa Community Plan, thus no mitigation is required. The impact is considered significant and unavoidable, consistent with the OMCPU PEIR.

  Britannia Boulevard, between SR-905 Eastbound Ramps and Airway Road - The Project would improve this roadway segment from a 5-Lane Prime Arterial (2 lanes NB/3 lanes SB) to its ultimate classification as a 6-Lane Prime Arterial per the currently adopted Otay Mesa Community Plan under Opening Year 2027 with Project Conditions. With this improvement, LOS is expected to remain at LOS F under the Horizon Year 2062 Plus Project scenario. Since

Table 25 Roadway Segment Analysis for Horizon Year (2062) with Project Conditions

Roadway	Segment	Functional Classification	Capacity (LOS E)	ADT	V/C	LOS	V/C w/o Project	LOS w/o Project	ΔV/C	SI?
Otay Mesa Rd	West of Cactus Rd	6-Lane Prime Arterial	60,000	37,250	0.621	C	0.609	C	0.012	N
Otay Mesa Rd	Cactus Rd to Continental St	6-Lane Prime Arterial	60,000	40,168	0.669	C	0.648	C	0.021	N
Otay Mesa Rd	Continental St to Britannia Blvd	6-Lane Prime Arterial	60,000	41,258	0.688	C	0.666	C	0.021	N
Otay Mesa Rd	East of Britannia Blvd	6-Lane Prime Arterial	60,000	37,362	0.623	C	0.609	C	0.014	N
Britannia Blvd	Otay Mesa Rd to SR-905 WB Ramps	6-Lane Prime Arterial	60,000	35,780	0.596	C	0.561	B	0.036	N
Britannia Blvd	SR-905 WB Ramps to SR-905 EB Ramps	6-Lane Prime Arterial	60,000	61,970	1.033	F	0.973	E	0.060	Y
Britannia Blvd	SR-905 EB Ramps to Airway Rd	5-Lane (2NB/3SB) Prime Arterial	50,000	78,129	1.563	F	1.464	F	0.099	Y
Britannia Blvd	South of Airway Rd	3-Lane (2NB/1SB) Major Arterial	30,000	63,913	2.130	F	2.122	F	0.008	N
Airway Rd	Cactus Rd to Park Wy	3-Lane (1EB/2WB) Collector	11,000	21,654	1.969	F	2.585	F	-0.616	N
Airway Rd	Park Wy to Continental St	3-Lane (1EB/2WB) Collector	11,000	22,871	2.079	F	2.585	F	-0.516	N
Airway Rd	Continental St to Britannia Blvd	2-Lane Collector	8,000	32,602	4.075	F	3.345	F	0.730	Y
Airway Rd	Britannia Blvd to 50 feet west of La Media Rd	2-Lane Collector	8,000	23,919	2.990	F	2.914	F	0.076	Y

Roadway	Segment	Functional Classification	Capacity (LOS E)	ADT	V/C	LOS	V/C w/o Project	LOS w/o Project	ΔV/C	SI?
Airway Rd	50 feet west of La Media Rd to La Media Rd	4-Lane Major Arterial[1]	40,000	23,919	0.598	C	0.583	C	0.015	N
Cactus Rd	Street D to Airway Rd	3-Lane (2NB/1SB) Major Arterial	30,000	7,337	0.245	A	0.765	D	-0.520	N
Cactus Rd	South of Airway Rd	2-Lane Collector	8,000	14,633	1.829	**F**	1.799	**F**	0.030	**Y**
Continental St	Street D / Colchester Ct to Airway Rd	2-Lane Collector w/ TWLTL	15,000	7,031	0.469	C	0.423	B	0.046	N

Note:
[1] To be constructed by CIP # S-15018 La Media Road improvements project
ADT = Average Daily Traffic
V/C = Volume to Capacity Ratio
TWLTL = Two-Way Left-Turn Lane
NB = Northbound
SB = Southbound
EB = Eastbound
WB = Westbound
Bold = LOS E or F
SI? = Significant Impact?
(CR Associates, 2026, Table 6.5)

Table 26 Roadway Segment Analysis Horizon Year (2062) with Project with Mitigation Conditions

Roadway	Segment	Before Mitigation					After Mitigation				
		Functional Classification	Capacity (LOS E)	ADT	V/C	LOS	Functional Classification	Capacity (LOS E)	ADT	V/C	LOS
Britannia Blvd	SR-905 EB Ramps to Airway Rd	5-Lane (2NB/3SB) Prime Arterial	50,000	78,129	1.563	**F**	6-Lane Prime Arterial	60,000	78,129	1.302	**F**
Airway Rd	Continental St to Britannia Blvd	2-Lane Collector	8,000	32,602	4.075	**F**	3-Lane (1EB/2WB) Collector	11,000	32,602	2.964	**F**
Airway Rd	Britannia Blvd to 50 feet west of La Media Rd	2-Lane Collector	8,000	23,919	2.990	**F**	2-Lane Collector w/ TWLTL	15,000	23,919	1.595	**F**
Cactus Rd	South of Airway Rd	2-Lane Collector	8,000	14,633	1.829	**F**	3-Lane (1NB/2SB) Major Arterial	30,000	14,633	0.488	B

Notes:
Bold = LOS E or F
V/C = Volume to Capacity Ratio
(CR Associates, 2026, Table 7.4)

this roadway would be built to its ultimate classification as a 6-Lane Prime Arterial in the currently adopted Otay Mesa Community Plan by the project in Opening Year 2027 with project conditions, no additional mitigation measures would be required, and the cumulative impact would remain significant and unavoidable, consistent with the OMCPU PEIR.

- Airway Road, between Continental Street and Britannia Boulevard - The Project would improve this roadway segment from a 2-Lane Collector to a 3-Lane (1 EB lane/2 WB lanes) Collector under Opening Year 2027 Plus Project. With this improvement, LOS is expected to remain at LOS F under the Horizon Year 2062 Plus Project scenario. However, since the roadway segment would operate at better than pre-project conditions, the project's cumulative impact would be mitigated by the recommended mitigation measure.

- Airway Road, between Britannia Boulevard and 50 feet west of La Media Road - The project would improve this roadway segment from a 2-Lane Collector to a 2-Lane Collector with a two-way center left-turn lane under Opening Year 2027 Plus Project conditions. With this improvement, LOS is expected to remain at LOS F under the Horizon Year 2062 Plus Project scenario. However, since the roadway segment would operate at better than pre-project conditions, the project's cumulative impact would be mitigated by the recommended mitigation measure.

- Cactus Road, south of Airway Road – The Project would improve this roadway segment from a 2-Lane Collector to a 3-Lane (1 NB/2 SB) Major Arterial under Opening Year 2027 Plus Project conditions. With this improvement, LOS is expected to improve from LOS F to LOS B in the Horizon Year 2062 Plus Project condition. Therefore, the project's significant cumulative impact would be mitigated by the recommended mitigation measure and no additional mitigation measures would be required by the project.

Freeway Ramp Meter Analysis

Table 27, *Freeway Ramp Meter Analysis for Horizon Year (2062) with Project Conditions*, displays freeway ramp meter analysis results for the study area locations under Horizon Year 2062 with project conditions. As shown, none of the freeway on-ramps would experience delays under Horizon Year 2062 conditions.

Freeway Segment Analysis

Table 28, *Freeway Segment Analysis for Horizon Year (2062) with Project Conditions,* displays freeway segment level of service results for the study area freeway mainline facilities under Horizon Year 2062 with project conditions. As shown, all freeway segments within the study area would operate at unacceptable LOS F. Based on City guidelines, mitigation measures would be required at the freeway segments in order to achieve acceptable LOS. However, these freeway segments are under the purview of Caltrans, and no current plans exist to improve these freeway segments; thus, these freeway segments would continue to operate at LOS F with the addition of Project traffic. The OMCPU PEIR found that these freeway segments would operate at an unacceptable LOS F and disclosed impacts to these freeway segments as significant and unavoidable. Therefore, the project is consistent with the findings and conclusions of the OMCPU PEIR related to these freeway segments.

Table 27 Freeway Ramp Meter Analysis for Horizon Year (2062) with Project Conditions

Location	Peak Hour	Total Demand[1] (veh/hr)	# of SOV Lanes	SOV Demand[2]	Meter Rate[3] (veh/hr/lane)	Excess Demand[4] (veh/hr/lane)	Delay[5] (min)	Queue[6] (ft)	Exceeds 15-minutes?	Delay[5] w/o Project (min)	Queue[6] w/o Project (ft)	SI?
SR-905 WB On-ramp @ Britannia Blvd	AM	1,236	2	618	960	0	0	0	N	0	0	N
	PM	1,715	2	858	960	0	0	0	N	0	0	N
SR-905 EB On-ramp @ Britannia Blvd	AM	550	2	275	960	0	0	0	N	0	0	N
	PM	733	2	367	960	0	0	0	N	0	0	N

Notes:
SOV = Single Occupancy Vehicle
[1] Total Demand is the peak hour demand for both SOV and HOV lanes expected to use the on-ramp.
[2] SOV Demand = (Total Demand – HOV Demand) / # of SOV Lanes.
[3] Meter Rate is the peak hour capacity expected to be processed through the ramp meter per lane. This value was obtained from Caltrans. The average between the "high" and "low" meter rate was used for this analysis.
[4] Excess Demand = (Demand) – (Meter Rate) or zero, whichever is greater.
[5] Delay = (Excess Demand / Meter Rate) X 60 min/hr.
[6] Queue = (Excess Demand) X 25 ft/veh. SOV volumes were used in the calculation of Queue. A zero represents no excess queue.
SI? = Significant Impact?
(CR Associates, 2026, Table 6.7)

Table 28 Freeway Segment Analysis for Horizon Year (2062) with Project Conditions

Freeway	Segment	AADT[1]	Peak Hour	Direction[2]	# of Lanes	Capacity[3]	D	K	HVF	Peak Hour Volume	V/C	LOS[4]	V/C w/o Project	LOS w/o Project	Δ V/C Ratio	SI?
SR-905	Caliente Ave and Heritage Rd	196,000	AM	EB	3M	7,050	68.25%	8.9%	17.54%	12,560	1.782	**F**	1.763	**F**	0.018	Y
			PM	EB	3M	7,050	60.64%	10.5%	17.54%	13,160	1.867	**F**	1.848	**F**	0.018	Y
	Heritage Rd and Britannia Blvd	173,000	AM	EB	3M	7,050	68.25%	8.9%	17.54%	11,090	1.573	**F**	1.555	**F**	0.018	Y
			PM	EB	3M	7,050	60.64%	10.5%	17.54%	11,620	1.648	**F**	1.630	**F**	0.018	Y
	Britannia Blvd and La Media Rd	154,000	AM	EB	3M+1A	8,460	68.25%	8.9%	17.54%	9,870	1.167	**F**	1.161	**F**	0.006	Y
			PM	EB	3M+1A	8,460	60.64%	10.5%	17.54%	10,340	1.222	**F**	1.217	**F**	0.005	Y

Notes:
M = Mainline. A = Auxiliary Lane.
[1] AADT = Annual Average Daily Traffic. AADT is provided by Caltrans Traffic Census Program (2021).
[2] In the direction of peak hour traffic. For SR-905, per Caltrans data, the peak hour direction is eastbound for both the AM and PM peak hours.
[3] The capacity is calculated as 2,350 ADT per main lane and 1,410 ADT (60% of the main lane capacity) per auxiliary lane.
[4] LOS during highest directional demand.
D = Directional split. | K = Peak hour %. | HVF = Heavy Vehicle Factor - consistent with the OMCPU. | V/C = Volume to Capacity Ratio
Bold = LOS E or F
SI? = Significant Impact?
(CR Associates, 2026, Table 6.8)

Traffic Hazards

Development of the project would result in alterations to the existing circulation system through intersection and roadway improvements. As proposed, access to the project would be provided via Airway Road, Cactus Road, Continental Street, proposed Street D, and proposed Park Way. The project would connect to existing utilities within Airway Road, Continental Street, and Cactus Road. The project would include appropriate improvements to Airway Road, Cactus Road, and Continental Street as well as the construction of public roadways Park Way and Street D. Specifically, the project includes the construction of Street D running east to west through the central portion of the project site and connecting with Cactus Road and Continental Street, as well as the construction of Park Way running north to south and connecting with Airway Road and proposed Street D. Circulation for the project site has been designed in accordance with City design standards and applicable OMCPU policies. The project's circulation would not result in traffic hazards for motor vehicles, bicyclists, and pedestrians.

Alternative Transportation

The project would be consistent with the City's General Plan policies supporting alternative transportation modes. The project would include the construction of pedestrian walkways and furnishings throughout the project site as well as a 14-foot wide parkway with 6 foot wide non-contiguous sidewalk along the project's frontage on Airway Road, a 12-foot wide parkway with 6-foot wide non-contiguous sidewalk along the project's frontage on Cactus Road, a 12-foot wide parkway with a 6-foot wide non-contiguous sidewalk along the project's frontage on Continental Street, a 22-foot wide parkway with 6-foot wide non-contiguous sidewalk on the east side and 12 ft wide parkway with 6-foot wide non-contiguous sidewalk on the west side along the project's frontage on Park Way, and a 12-foot wide parkway with 6-foot wide non-contiguous sidewalk on both sides of Street D. Additionally, the project would include bicycle parking and a bicycle repair station within the project site as well as a buffered Class II bike lane on the north side of Airway Road along the project's frontage, a buffered Class II bike lane on the east side of Cactus Road along the project's frontage, buffered Class II bike lanes on both sides of Continental Street, Class I bike path on the west side of Park Way, and buffered Class II bike lanes on both sides of Street D between Cactus Road and Park Way. The proposed pedestrian facilities and bicycle facilities have been designed in accordance with City design standards and consistent with the OMCPU and CVSP.

Traffic/Circulation Impacts Conclusion

Based on the foregoing analysis and information, implementation of the project would not require a major revision to the PEIR, nor result in any new significant impacts or increase the severity of a previously identified significant impact as analyzed and described in the 2014 OMCPU PEIR.

PUBLIC SERVICES

2014 OMCPU PEIR

Section 5.13 of the OMCPU PEIR found that the population increase due to implementation of the CVSP would generate greater demand for public facilities and services, including police, fire, libraries, schools, and maintenance of public facilities. The PEIR noted that future projects would be

subject to fees to fund potential future development for additional police, fire resources, and schools. The PEIR concluded that impacts would be less than significant, and mitigation was not required.

The OMCPU PEIR found that buildout of the OMPCU would result in substantial population growth. However, the OMCPU PEIR found that the OMCPU would implement policies contained in SANDAG's RCP (updated and renamed to: San Diego Forward: The Regional Plan, approved October, 2015) and the City of San Diego's General Plan by providing a mix of housing types near public transportation, increase the regional and local supply of housing needed in accordance with SANDAG's regional growth forecast, and focus housing supply within compact villages that would be linked together by public transportation. As such, the OMCPU PEIR found that impacts associated with population growth would be less than significant without mitigation.

The OMCPU PEIR found that approximately 77 percent of the residential dwelling units associated with the buildout of the OMCPU would consist of multi-family units and implementation of the OMCPU Policies 2.2-5 through 2.2-8 would provide affordable housing within the OMCPU area. As such, the OMCPU PEIR concluded that the OMPCU would be consistent with federal and state affordable housing, and impacts associated with affordable housing would be less than significant without mitigation.

Collection at Cactus Project

The project would result in the development of 985 single-family residences, which would result in approximately 1,621 additional residents (3.63 persons per household x 985 residences = 1,621 residents). The project would be consistent with the land uses noted within the OMCPU and General Plan, and therefore would be within the analysis included as part of SANDAG's regional growth forecast. The project site includes 83 Affordable units, which is consistent with applicable affordable housing and OMCPU policies. As noted in the OMCPU PEIR, the project would increase demand for all public facilities.

Buildout of the project would increase demand for fire protection and would contribute to the need for new or altered facilities. The buildout of the project would not directly result in the need for additional firefighters or expanded resources. Furthermore, the construction and operation of new public facilities would be subject to separate environmental review; as such plans are not currently available, it would be speculative to determine impacts associated with the expansion or construction of additional fire facilities. The project would be subject to development impact fees, and the population increase due to the project was accounted for in the scope of the OMCPU PEIR. Thus, impacts to fire protection would be less than significant.

Buildout of the project would increase demand for police protection and would contribute to the need for additional police protection. The project would not directly result in the need for additional officers or altered facilities. The project would also be subject to development impact fees. Furthermore, the construction and operation of new public facilities would be subject to separate environmental review; as such plans are not currently available, it would be speculative to determine impacts associated with the expansion or construction of additional police facilities. Therefore, impacts to police protection would be less than significant.

The project would result in increased demand for school resources and would result in an increase in the student population. Based on the student generation rates included in the OMCPU PEIR, the project would result in approximately 670 additional students. This increase in student population was accounted for in the OMCPU PEIR, and the project would not lead to an increase in students greater than what was already analyzed. Additionally, The project would be subject to development impact fees and OMCPU policies to support educational opportunities. Furthermore, the construction and operation of new public facilities would be subject to separate environmental review; as such plans are not currently available, it would be speculative to determine impacts associated with the expansion or construction of additional school facilities. Therefore, impacts to schools would be less than significant.

Public Services and Facilities Impacts Conclusion

Based on the foregoing analysis and information, the project is within the scope of the analysis of the 2014 OMCPU PEIR. Thus, implementation of the project would not require a major revision to the PEIR, nor result in any new significant impacts or increase the severity of a previously identified significant impact as analyzed and described in the 2014 OMCPU PEIR.

UTILITIES

2014 OMCPU PEIR

Section 5.14 of the OMCPU PEIR evaluated impacts on utility services that may occur through development of the OMCP.

Water, Sewer, and Reclaimed Water

The OMCPU PEIR found that water, wastewater, reclaimed water, storm water infrastructure, and communication systems associated with the buildout of the OMCPU would not result in significant impacts to the environment. In regards to solid waste, the OMCPU PEIR found that implementation of the OMCPU would result in potentially significant impacts because the OMCPU PEIR could not guarantee at the program-level that all future projects would attain the 75 percent state-mandated diversion rate. The OMCPU PEIR identified Mitigation Framework UTIL-1 to reduce potential impacts, which requires that future development projects that generate 60 tons or more of solid waste prepare a Waste Management Plan (WMP). The OMPCU PEIR found that even with implementation of mitigation framework UTIL-1 and compliance with the Storage, Recycling, and C&D ordinances, impacts related to solid waste to meet the diversion requirement cannot be assured at the program-level. Therefore, the OMCPU PEIR concluded that further evaluation would be required at the project level to identify additional mitigation measures to reduce significant impacts. As such, the OMCPU PEIR disclosed that impacts associated with solid waste were significant and unavoidable and a statement of overriding considerations was adopted.

The OMCPU PEIR found that based on the Water Supply Assessments (WSA) of the City's water suppliers providing service to the OMCPU area, including the Public Utilities Department and OWD, there would be sufficient water supply to serve existing demands and projected demands of the

OMCPU. As such, the OMPCU PEIR concluded that impacts related to water supply would be less than significant.

Collection at Cactus Project

The City of San Diego would provide sanitary sewer service for the project site. The project proposes connection to the existing 15-inch sewer line in Continental Street. As noted in the project's Sewer Study prepared by Dexter Wilson Engineering (Dexter Wilson, 2025, *Appendix H*), the project would result in an average sewage flow of 22,640 gpd, which would be within the assumed total wastewater generation of 9.68 million gallons per day (mgpd) included in the PEIR.

Under existing conditions, there are minimal drainage improvements within the project site boundary. On-site drainage improvements will include two on site water quality/hydromodification basins with a storm drain system to safely convey runoff through the project to the biofiltration basins to address water quality, hydromodification and peak flow mitigation before discharging into the existing drainage system similar to existing conditions.

Construction of on-site drainage facilities is inherent to the construction phase of the project and impacts due to project construction have been evaluated herein and in the PEIR. There would be no environmental impacts associated with the project's proposed drainage infrastructure that have not already been addressed. Additionally, the project is required to comply with OMCPU Policies to ensure that impacts due to installation of storm water infrastructure would be reduced to below a level of significance. Furthermore, because the project meets City of San Diego requirements for on-site drainage facilities, the project would not result in or require expansion of off-site drainage facilities except as may be needed for off-site roadway construction. Accordingly, and consistent with the findings of the PEIR, impacts associated with storm water facilities would be less than significant.

Consistent with OMCPU PEIR Mitigation Framework UTIL-1, a WMP was prepared by T&B Planning , Inc. (T&B, Planning, 2024) and is included as *Technical Appendix J*. As noted in the WMP, construction of the project would result in the generation of approximately 2,312.7 tons of building construction waste and would divert approximately 84.3% of construction-related waste from the landfill, which exceeds the 75% waste reduction requirement for construction and demolition debris as required by the City's Municipal Code. Additionally, the project would result in 1,369.41 tons of waste generated per year under operational conditions. The WMP concluded that the project would be required to provide 1,845.12 sf of refuse storage area, 1,845.12 sf of recyclable storage area, and a total of 5,535.36 sf of total refuse storage area. The project would also be required to divert 50% of operation-related waste from the landfill. The project would be subject to the requirements included as part of the WMP. Following compliance with the waste reduction, recycling, and diversion measures included in the WMP, and consistent with the findings of the PEIR, impacts associated with waste disposal would be less than significant.

The project is within the Otay Water District (OWD) service area. A Subarea Master Plan was prepared by Dexter Wilson Engineering (Dexter Wilson, 2025) and is included as *Technical Appendix I*. The Subarea Master Plan concluded that the project would result in a water demand rate of 200 gallons per day (gpd) per dwelling unit and 1,900 gpd per acre of parkland. The total estimated average day demand is 214,252 gpd, which is consistent with projections included as part of the

OWD 2015 Water Facilities Master Plan and the OMCPU analysis. Therefore, the project would not affect the ability of the water-serving agencies to provide water.

Utilities Impacts Conclusion

Based on the foregoing analysis and information, the project is within the scope of the analysis of the 2014 OMPCU PEIR. Thus, implementation of the project would not require a major revision to the PEIR, nor result in any new significant impacts or increase the severity of a previously identified significant impact as analyzed and described in the 2014 OMCPU PEIR.

WATER SUPPLY

2014 OMCPU PEIR

The OMCPU PEIR found that based on the Water Supply Assessments (WSA) of the City's water suppliers providing service to the OMCPU area, including the Public Utilities Department and OWD, there would be sufficient water supply to serve existing demands and projected demands of the OMCPU. As such, the OMPCU PEIR concluded that impacts related to water supply would be less than significant.

The OMCPU PEIR found that buildout of the OMCPU would result in the placement of new landscaping throughout the OMCPU area that would require watering for irrigation purposes. However, the OMCPU PEIR found that all future development would be required to conform with existing regulations, as well as the General Plan and OMCPU policies, which would ensure the use of predominantly drought-resistant landscaping and water conservation for landscape maintenance. As such, the OMCPU PEIR found that impacts related to the use of non-drought resistant landscaping and excessive water usage for irrigation would be less than significant without mitigation.

Collection at Cactus Project

The project is within the OWD service area. The project-specific Subarea Master Plan concluded that the project would result in a water demand rate of 200 gallons per day (gpd) per dwelling unit and 1,900 gpd per acre of parkland. The total estimated average day demand is 214,252 gpd, which is consistent with the OWD 2015 Water Facilities Master Plan and the OMCPU analysis. Therefore, the project would not affect the ability of the water-serving agencies to provide water.

The project's landscape plan was reviewed for conformance with all applicable regulations as well as General Plan and OMCPU policies as part of the NDP review process. The project Applicant proposes use of predominantly drought-resistant landscaping and water conservation for landscape maintenance and impacts would be less than significant. Impacts would be consistent with the findings of the OMCPU PEIR.

Water Supply Impacts Conclusion

Based on the foregoing analysis and information, the project is within the scope of the analysis of the 2014 OMPCU PEIR. Thus, implementation of the project would not require a major revision to

the PEIR, nor result in any new significant impacts or increase the severity of a previously identified significant impact as analyzed and described in the 2014 OMCPU PEIR.

POPULATION AND HOUSING

2014 OMCPU PEIR

Section 5.16 of the OMCPU PEIR provides an analysis of population and housing impacts associated with the OMCP.

Population Growth

The OMCPU PEIR found that buildout of the OMPCU would result in substantial population growth. However, the OMCPU PEIR found that the OMCPU would implement policies contained in SANDAG's RCP (updated and renamed to: San Diego Forward: The Regional Plan, approved October, 2015) and the City of San Diego's General Plan by providing a mix of housing types near public transportation, increase the regional and local supply of housing needed in accordance with SANDAG's regional growth forecast, and focus housing supply within compact villages that would be linked together by public transportation. As such, the OMCPU PEIR found that impacts associated with population growth would be less than significant without mitigation.

Affordable Housing

The OMCPU PEIR found that approximately 77 percent of the residential dwelling units associated with the buildout of the OMCPU would consist of multi-family units and implementation of the OMCPU Policies 2.2-5 through 2.2-8 would provide affordable housing within the OMCPU area. As such, the OMCPU PEIR concluded that the OMPCU would be consistent with federal and state affordable housing, and impacts associated with affordable housing would be less than significant without mitigation.

Collection at Cactus Project

Population Growth

The project would result in the development of 985 single-family residences, which would result in approximately 1,621 additional residents. The project would be consistent with the land uses proposed as part of the General Plan and OMCPU and therefore would be within the analysis included as part of SANDAG's regional growth forecast. and the population increase due to the project was accounted for in the scope of the OMCPU PEIR.

Affordable Housing

The project includes 83 Affordable units, which is consistent with applicable affordable housing and OMCPU policies.

Population and Housing Impacts Conclusion

Based on the foregoing analysis and information, the project is within the scope of the analysis of the 2014 OMPCU PEIR. Thus, implementation of the project would not require a major revision to the PEIR, nor result in any new significant impacts or increase the severity of a previously identified significant impact as analyzed and described in the 2014 OMCPU PEIR.

AGRICULTURAL AND MINERAL RESOURCES

2014 OMCPU PEIR

Section 5.17 of the OMCPU PEIR provides an analysis of agricultural and mineral resource impacts associated with the OMCP.

The OMCPU PEIR concluded that buildout of the OMCPU would convert 180 acres of Farmland of Statewide Importance and 28 acres of Unique Farmland to non-agricultural use, both of which occur within the Central Village area. However, the OMCPU PEIR found that these areas are fragmented and are surrounded by urban land uses and MHPA lands. Rising land values, water g, increasing taxes, habitat management planning, and other land use conflicts were found to have contributed to a significant reduction in future agricultural viability within the OMCPU area. Furthermore, agricultural land in the OMCPU area is intended as an interim, rather than permanent use. The OMCPU allows agriculture as an interim use pending development and the City rezoned the Central Village to an agricultural "holding" zone (AR-1-1) concurrently with adoption of the OMCPU to accommodate continued agricultural operations until such time that a Specific Plan is implemented. Therefore, impacts associated with the conversion of agricultural land to nonagricultural uses were found by the OMCPU PEIR to be less than significant.

The OMCPU PEIR found that portions of the OMCPU area are located within Mineral Resource Zone (MRZ)-2 and MRZ-3. MRZ-3 zones are not considered sensitive because they comprise areas that may or may not have mineral resources. However, MRZ-2 lands represent areas containing regionally significant mineral deposits. The OMCPU PEIR found that the majority of acreage designated MRZ-2, which occurs in the northernmost portion of the OMCPU area, contains existing residential uses that would be incompatible with the establishment of any new mineral resource operations. In addition, the OMCPU PEIR found that the OMCPU area does not include any existing or proposed mining operations, and development associated with buildout of the OMCPU would not result in indirect impacts to any existing extraction operations in the vicinity of the OMCPU. As such, the OMCPU PEIR concluded that the ability to extract mineral resources would not be impacted with implementation of the OMCPU. The General Plan and OMCPU also do not identify any portion of the OMCPU as a locally important mineral resources recovery site, and no impact due to the loss of such locally-important sites would occur.

Collection at Cactus Project

The project site is identified as "Farmland of Local Importance" by the Farmland Mapping and Monitoring Program (FMMP). Currently, the project site is vacant and undeveloped. Under existing conditions, the project site is designated as Medium-High Density Mixed Use, Medium Density Multi-Family, Medium-High Density Multi Family, and Park land uses. The project does not propose changes to the land uses proposed as part of the CVSP and analyzed in the OMCPU. Therefore, the project site would not result in the conversion of Prime Farmland, Unique Farmland, or Farmland of

Statewide Importance (Farmland) as shown on the maps prepared pursuant to the FMMP of the California Resources Agency, to non-agriculture uses.

Land uses to the north of the project site include SR-94 directly north of the project site and industrial land uses. Land uses to the east of the site include mixed use, industrial, and residential land uses. Land uses to the south of the site include industrial land uses. Land uses to the west of the project site include mixed use, industrial, and open space land uses. The project site is not adjacent to farmland and thus would not result in the conversion of farmland to non-agricultural uses.

The project site does not include any existing or proposed operations, and development of the project would not impact existing or proposed extracting operations in the area. Under existing conditions, the project site is zoned for mixed use, residential, and park land uses, which do not include mineral extraction. Therefore, development of the project site would not impact future extraction uses on the site.

Agricultural and Mineral Impacts Conclusion

The OMCPU PEIR determined that impacts related to conversion of agricultural land and mineral resources would be less than significant, and no mitigation would be required. Based on the foregoing analysis and information, the project is within the scope of the analysis of the 2014 OMPCU PEIR. Thus, implementation of the project would not require a major revision to the PEIR, nor result in any new significant impacts or increase the severity of a previously identified significant impact as analyzed and described in the 2014 OMCPU PEIR.

GREENHOUSE GAS EMISSIONS

2014 OMCPU PEIR

Section 5.18 of the OMCPU PEIR found that buildout of the OMCPU would reduce greenhouse gas (GHG) emissions by between 9.1 and 11.4 percent compared to Business as Usual (BAU), which does not meet the City's goal of a minimum 28.3 percent reduction in emission levels; therefore, the OMCPU PEIR found that impacts associated with GHG emissions would be significant. The OMCPU PEIR identified Mitigation Framework GHG-2 to reduce impacts, which requires future development projects to demonstrate avoidance of significant impacts related to long-term operational emissions as identified in Mitigation Framework GHG-1, and to include project-level GHG reduction design features that demonstrate a reduction in GHG emissions to the extent practicable. The OMCPU PEIR concluded that even with adherence to Mitigation Framework GHG-2 and compliance with applicable General Plan and OMPCU policies, impacts associated with the contribution of GHG emissions to cumulative statewide emissions would be significant and unavoidable. A statement of overriding considerations was adopted for this impact.

Although the OMCPU contains policies that are consistent with the strategies of local and state plans to reduce GHG emissions, the OMCPU PEIR found that future development projects may not meet the City's reduction goals associated with achieving the reductions required by AB 32; therefore, the OMCPU PEIR found that the OMCPU would have potential to conflict with applicable plans and impacts would be potentially significant at the program-level. The OMCPU PEIR identified Mitigation

Framework GHG-1 to reduce potential impacts, which requires future development projects to demonstrate avoidance of significant impacts related to long-term GHG emissions by including GHG-reducing features based on a project-specific analysis. The OMCPU PEIR concluded that even with adherence to Mitigation Framework GHG-1 and compliance with applicable General Plan and OMPCU policies, impacts related to GHG emissions would be significant and unavoidable. A statement of overriding considerations was adopted for this impact.

Collection at Cactus Project

Construction Emissions

The OMCPU PEIR's consideration of construction-related GHG emissions assumed that sources of construction-related emissions would include: a) fugitive dust from grading activities; b) construction equipment exhaust; c) construction-related trips by workers, delivery trucks, and material-hauling trucks; and d) construction-related power consumption. Based on industry-standard construction practices, these are reasonable assumptions for sources of construction activity air emissions associated with the project. As such, there would be no change in construction-related GHG emissions quantities associated with the project. Therefore, implementation of the project would not result in any new impacts or increase the severity of a previously identified significant impact as previously analyzed in the OMCPU PEIR.

Operational Emissions

Consistent with the assumptions for the project site in the OMCPU PEIR, the development on the project site would generate operational-related GHG emissions. As previously noted, the project would be developed in accordance with the land use assumptions for the site. Thus, the project's land uses and emissions were included in the scope of analysis conducted for the OMCPU.

Climate Action Plan

In the time following the certification of the OMCPU PEIR, the City of San Diego adopted the 2022 CAP Update and proposed a more detailed draft CAP Implementation Plan (February 2023).
For purposes of analysis herein, the significance threshold related to "conflicting with an applicable plan, policy, or regulation adopted for the purpose of reducing the emission of GHGs" is based on the City's approved CAP, which is the methodology now used by the City in order to provide a consistent, localized, and comprehensive approach for the assessment of GHG impacts. Thus, the City's CAP is the applicable plan for reducing GHG emissions in the City of San Diego. Projects that are consistent with the CAP are able to conclude that the project would have less than significant cumulatively considerable GHG emissions impacts under CEQA.
As required by Mitigation Frameworks GHG-1 and GHG-2, compliance with the CAP is determined through land use consistency and project compliance with the regulations set forth in SDMC Chapter 14, Article 3, Division 14. The first step in determining CAP consistency is to assess the project's consistency with the growth projections used in the development of the CAP. Since the project would be consistent with the existing land use plan and zoning designations included as part of the General Plan and OMCPU, the project would be consistent with the CAP. The second step in demonstrating CAP consistency is a review to ensure consistency with the regulations set forth in SDMC Chapter 14, Article 3, Division 14. In compliance with the CAP, the project would include street

trees that provide at least 50% shade over the pedestrian walkways and furnishings such as benches, trash, recycling, dog stations, and signage along the public roadways. The project would also provide an on-site bicycle repair station to support alternative mobility options. Therefore, the project complies with the CAP Regulations adopted in 2022 as part of the City's CAP Update. Because the City's CAP was prepared in compliance with CEQA Section 15183.5 and is intended to achieve the City of San Diego's share of Statewide GHG reduction targets, the project's demonstrated compliance with the CAP indicates that a less-than-significant GHG impact would occur related to compliance with planning policies and regulations. No new impact would occur in comparison to the GHG analysis presented in the 2014 OMCPU PEIR.

Greenhouse Gas Emissions Impacts Conclusion

The OMCPU PEIR identified potentially significant impacts related to greenhouse gas emissions and included Mitigation Framework GHG-1 and GHG-2. In compliance with Mitigation Frameworks GHG-1 and GHG-2, the project would be consistent with the City's CAP.

Based on the foregoing analysis and information, the project is within the scope of the analysis of the 2014 OMCPU PEIR. Thus, implementation of the project would not require a major revision to the PEIR, nor result in any new significant impacts or increase the severity of a of a previously identified significant impact as analyzed and described in the 2014 OMCPU PEIR.

VI. ISSUES NOT ANALYZED IN THE PREVIOUS EIR

CEQA Guidelines, Section 15128, allows environmental issues for which there is no likelihood of a significant impact to not be discussed in detail or analyzed further in the PEIR. The certified OMCPU PEIR provided a similar level of analysis, even for those issue areas considered to result in impacts found not to be significant. Revisions to the project components evaluated under the PEIR are proposed with the current project. Through the environmental analysis conducted, the City has determined that the current project, subject of and evaluated under this Addendum would not have the potential to cause significant impacts to those issue areas beyond those analyzed. While these issues were not analyzed in detail, as outlined in CEQA Section 15128. There is no new information available that would indicate that these issues would result in new significant impacts.

VII. SIGNIFICANT UNMITIGATED IMPACTS

The OMCPU PEIR No. 30330/304032/SCH No. 2004051076 indicated that direct significant impacts to the following issues would be substantially lessened or avoided if all of the proposed mitigation measures recommended in the PEIR were implemented: land use, biological resources, historical resources, hydrology/water quality, geology/soils, and paleontological resources. The OMCPU PEIR concluded that significant impacts related to air quality/odor, noise, transportation/circulation, public utilities, and greenhouse gas emissions would not be fully mitigated below a level of significance. With respect to cumulative impacts, implementation of the OMCPU PEIR would result in significant air quality/odor, traffic/circulation, and greenhouse gas emissions, which would remain significant and unmitigated. Because there were significant unmitigated impacts associated with the original project approval, the decision maker was required to make specific and substantiated "CEQA Findings" which stated: (a) specific economic, social, or other considerations which make infeasible the mitigation measures or project alternatives identified in the PEIR, and (b) the impacts

have been found acceptable because of specific overriding considerations. Given that there are no new or more severe significant impacts that were not already addressed in the previous certified PEIR, new CEQA Findings and/or Statement of Overriding Considerations are not required.

The proposed project would not result in any additional significant impacts, nor would it result in an increase in the severity of impacts from those described in the previously certified PEIR.

VIII. MITIGATION, MONITORING, AND REPORTING PROGRAM (MMRP) INCORPORATED INTO THE PROJECT

The project shall be required to comply with applicable mitigation measures outlined within the MMRP of the previously certified PEIR (PRJ-1111415 / SCH No. 2004051076) and the project-specific subsequent technical studies. The following MMRP identifies measures that specifically apply to this project:

A. GENERAL REQUIREMENTS – PART I Plan Check Phase (prior to permit issuance)

1. Prior to the issuance of a Notice To Proceed (NTP) for a subdivision, or any construction permits, such as Demolition, Grading or Building, or beginning any construction-related activity on-site, the Development Services Department (DSD) Director's Environmental Designee (ED) shall review and approve all Construction Documents (CD), (plans, specification, details, etc.) to ensure the MMRP requirements are incorporated into the design.

2. In addition, the ED shall verify that the MMRP Conditions/Notes that apply ONLY to the construction phases of this project are included VERBATIM, under the heading, "**ENVIRONMENTAL/MITIGATION REQUIREMENTS**."

3. These notes must be shown within the first three (3) sheets of the construction documents in the format specified for engineering construction document templates as shown on the City website: http://www.sandiego.gov/development-services/industry/information/standtemp.shtml

4. The **TITLE INDEX SHEET** must also show on which pages the "Environmental/Mitigation Requirements" notes are provided.

5. **SURETY AND COST RECOVERY –** The Development Services Director or City Manager may require appropriate surety instruments or bonds from private Permit Holders to ensure the long-term performance or implementation of required mitigation measures or programs. The City is authorized to recover its cost to offset the salary, overhead, and expenses for City personnel and programs to monitor qualifying projects.

B. GENERAL REQUIREMENTS – PART II Post Plan Check (After permit issuance/Prior to start of construction)

1. **PRE CONSTRUCTION MEETING IS REQUIRED TEN (10) WORKING DAYS PRIOR TO BEGINNING ANY WORK ON THIS PROJECT.** The PERMIT HOLDER/OWNER is

responsible to arrange and perform this meeting by contacting the CITY RESIDENT ENGINEER (RE) of the Field Engineering Division and City staff from MITIGATION MONITORING COORDINATION (MMC). Attendees must also include the Permit holder's Representative(s), Job Site Superintendent, and the following consultant:

Qualified biological monitor
Qualified archeologist
Qualified paleontological monitor

Note: Failure of all responsible Permit Holder's representatives and consultants to attend shall require an additional meeting with all parties present.

CONTACT INFORMATION:

a) The PRIMARY POINT OF CONTACT is the **RE** at the **Field Engineering Division – 858-627-3200**

b) For Clarification of ENVIRONMENTAL REQUIREMENTS, applicant is also required to call **RE and MMC at 858-627-3360**

2. **MMRP COMPLIANCE:** This project, PRJ-1111415 and/or Environmental Document Number 1111415, shall conform to the mitigation requirements contained in the associated Environmental Document and implemented to the satisfaction of the DSD's Environmental Designee (MMC) and the City Engineer (RE). The requirements may not be reduced or changed but may be annotated (i.e., to explain when and how compliance is being met and location of verifying proof, etc.). Additional clarifying information may also be added to other relevant plan sheets and/or specifications as appropriate (i.e., specific locations, times of monitoring, methodology, etc.

Note: Permit Holder's Representatives must alert RE and MMC if there are any discrepancies in the plans or notes, or any changes due to field conditions. All conflicts must be approved by RE and MMC BEFORE the work is performed.

3. **OTHER AGENCY REQUIREMENTS:** Evidence of compliance with all other agency requirements or permits shall be submitted to the RE and MMC for review and acceptance prior to the beginning of work or within one week of the Permit Holder obtaining documentation of those permits or requirements. Evidence shall include copies of permits, letters of resolution, or other documentation issued by the responsible agency:

Not Applicable

4. **MONITORING EXHIBITS:** All consultants are required to submit, to RE and MMC, a monitoring exhibit on a 11x17 reduction of the appropriate construction plan, such as site plan, grading, landscape, etc., marked to clearly show the specific areas including the **LIMIT OF WORK**, scope of that discipline's work, and notes indicating

when in the construction schedule that work would be performed. When necessary for clarification, a detailed methodology of how the work would be performed shall be included.

NOTE: Surety and Cost Recovery – When deemed necessary by the Development Services Director or City Manager, additional surety instruments or bonds from the private Permit Holder may be required to ensure the long-term performance or implementation of required mitigation measures or programs. The City is authorized to recover its cost to offset the salary, overhead, and expenses for City personnel and programs to monitor qualifying projects.

5. **OTHER SUBMITTALS AND INSPECTIONS:** The Permit Holder/Owner's representative shall submit all required documentation, verification letters, and requests for all associated inspections to the RE and MMC for approval per the following schedule:

Project-Specific Document Submittal/Inspection Checklist

Issue Area	Document Submittal	Associated Inspection/Approvals/Notes
General	Consultant Qualification Letters	Prior to Preconstruction Meeting
General	Consultant Construction Monitoring Exhibits	Prior to or at Preconstruction Meeting
Archaeology	Archaeology Reports	Archaeology Observation
Biology	Biology Reports	Biological Observation
Bond Release	Request for Bond Release Letter	Final MMRP Inspections Prior to Bond Release Letter

C. SPECIFIC MMRP ISSUE AREA CONDITIONS/REQUIREMENTS

AIR QUALITY/ODOR

Mitigation Framework AQ-1: For projects that would exceed daily construction emissions thresholds established by the City of San Diego, best available control measures/technology shall be incorporated to reduce construction emissions to below daily emission standards established by the City of San Diego. Best available control measures/technology shall include:

a. Minimizing simultaneous operation of multiple pieces of construction equipment;

b. Use of more efficient or low pollutant emitting, equipment, e.g. Tier III or IV rated equipment;

c. Use of alternative fueled construction equipment;

d. Dust control measures for construction sites to minimize fugitive dust, e.g. watering, soil stabilizers, and speed limits; and

e. Minimizing idling time by construction vehicles.

BIOLOGICAL RESOURCES

MM-BIO-1: Resource Protections During Construction

I. Prior to Construction

A. **Biologist Verification:** The owner/permittee shall provide a letter to the City's Mitigation Monitoring Coordination (MMC) section stating that a Project Biologist (Qualified Biologist) as defined in the City of San Diego's Biological Guidelines (2018), has been retained to implement the project's biological monitoring program. The letter shall include the names and contact information of all persons involved in the biological monitoring of the project.

B. **Preconstruction Meeting:** The Qualified Biologist shall attend the preconstruction meeting, discuss the project's biological monitoring program, and arrange to perform any follow up mitigation measures and reporting including site-specific monitoring, restoration or revegetation, and additional fauna/flora surveys/salvage.

C. **Biological Documents:** The Qualified Biologist shall submit all required documentation to MMC verifying that any special mitigation reports including but not limited to, maps, plans, surveys, survey timelines, or buffers are completed or scheduled per City Biology Guidelines, Multiple Species Conservation Program (MSCP), Environmentally Sensitive Lands Ordinance (ESL), project permit conditions; California Environmental Quality Act (CEQA); endangered species acts (ESAs); and/or other local, state or federal requirements.

D. **BCME:** The Qualified Biologist shall present a Biological Construction Mitigation/Monitoring Exhibit (BCME) which includes the biological documents in C above. In addition, include: restoration/revegetation plans, plant salvage/relocation requirements (e.g., coastal cactus wren plant salvage, burrowing owl exclusions, etc.), avian or other wildlife surveys/survey schedules (including general avian nesting and USFWS protocol), timing of surveys, wetland buffers, avian construction avoidance areas/noise buffers/ barriers, other impact avoidance areas, and any subsequent requirements determined by the Qualified Biologist and the City ADD/MMC. The BCME shall include a site plan, written and graphic depiction of the project's biological mitigation/monitoring program, and a schedule. The BCME shall be approved by MMC and referenced in the construction documents.

E. **Resource Delineation:** Prior to construction activities, the Qualified Biologist shall supervise the placement of orange construction fencing or equivalent along the limits of disturbance adjacent to sensitive biological habitats and verify compliance with any other project conditions as shown on the BCME. This phase shall include flagging plant specimens and delimiting buffers to protect sensitive biological resources (e.g., habitats/flora & fauna species, including nesting birds) during construction. Appropriate steps/care should be taken to minimize attraction of nest predators to the site.

F. **Education:** Prior to commencement of construction activities, the Qualified Biologist shall meet with the owner/permittee or designee and the construction crew and conduct an on-site educational session regarding the need to avoid impacts outside of the approved construction area and to protect sensitive flora and fauna (e.g., explain the avian and

wetland buffers, flag system for removal of invasive species or retention of sensitive plants, and clarify acceptable access routes/methods and staging areas, etc.).

II. During Construction

A. **Monitoring**: All construction (including access/staging areas) shall be restricted to areas previously identified, proposed for development/staging, or previously disturbed as shown on "Exhibit A" and/or the BCME. The Qualified Biologist shall monitor construction activities as needed to ensure that construction activities do not encroach into biologically sensitive areas, or cause other similar damage, and that the work plan has been amended to accommodate any sensitive species located during the pre-construction surveys. In addition, the Qualified Biologist shall document field activity via the Consultant Site Visit Record (CSVR). The CSVR shall be e-mailed to MMC on the 1st day of monitoring, the 1st week of each month, the last day of monitoring, and immediately in the case of any undocumented condition or discovery.

B. **Subsequent Resource Identification:** The Qualified Biologist shall note/act to prevent any new disturbances to habitat, flora, and/or fauna onsite (e.g., flag plant specimens for avoidance during access, etc). If active nests or other previously unknown sensitive resources are detected, all project activities that directly impact the resource shall be delayed until species specific local, state or federal regulations have been determined and applied by the Qualified Biologist.

III. Post Construction Measures

A. In the event that impacts exceed previously allowed amounts, additional impacts shall be mitigated in accordance with City Biology Guidelines, ESL and MSCP, State CEQA, and other applicable local, state and federal law. The Qualified Biologist shall submit a final BCME/report to the satisfaction of the City ADD/MMC within 30 days of construction completion.

HISTORICAL RESOURCES

MM-HIST-1: Data Recovery Program

I. HISTORICAL RESOURCES ARCHAEOLOGICAL DATA RECOVER PROGRAM. This project requires implementation of an Archaeological Data Recovery Program (ADRP) to mitigate impacts to archaeological site CA-SDI-11,424, prior to the issuance of ANY construction permits or the start of ANY construction if no permits are required. The ADRP with Native American participation consists of a Statistical Sample and shall be implemented as described below after consultation with DSD ED in accordance with the Cultural Resources Report prepared by Dudek (May 2025).

a. Phase 1: Hand excavation of 104 test units for a proposed sample size of 2.5% which represents the approximately 4,500 square meter area of greatest research potential. An additional phase of sampling will be determined if necessary following Phase 1 results;

b. Laboratory Analysis in the form of specialized studies shall be conducted in accordance with the ADRP;

c. Curation of all materials recovered during the ADRP with the exception of human remains and any associated burial goods, shall be prepared in compliance local, state and federal standards and be permanently curated at an approved facility that meets City standards;

d. ADRP provision for the discovery of human remains shall be invoked in accordance with the California Public Resources Code, the Health and Safety Code. In the event human remains are encountered during the ADRP, soil shall only be exported from the project site after it has been cleared by the Most Likely Descendant (MLD) and the Project Archaeologist;

e. Archaeological and Native American Monitoring shall be conducted during the remaining grading activities after completion of the ADRP and acceptance of a draft progress report for the program. The detailed Mitigation Monitoring and Reporting Program is identified in below.

f. Upon completion of the ADRP and prior to issuance of grading permits, the qualified archaeologist and Native American Monitor shall attend a second preconstruction meeting to make comments and/or suggestions concerning the proposed grading process.

MM-HIST-2: Archaeological Monitoring

I. Prior to Permit Issuance

A. Entitlements Plan Check

1. Prior to issuance of any construction permits, including but not limited to, the first Grading Permit, Demolition Plans/Permits and Building Plans/Permits or a Notice to Proceed for Subdivisions, but prior to the first preconstruction meeting, whichever is applicable, the Assistant Deputy Director (ADD) Environmental designee shall verify that the requirements for Archaeological Monitoring and Native American monitoring have been noted on the applicable construction documents through the plan check process.

B. Letters of Qualification have been submitted to ADD

1. The applicant shall submit a letter of verification to Mitigation Monitoring Coordination (MMC) identifying the Principal Investigator (PI) for the project and the names of all persons involved in the archaeological monitoring program, as defined in the City of San Diego Historical Resources Guidelines (HRG). If applicable, individuals involved in the archaeological monitoring program must have completed the 40-hour HAZWOPER training with certification documentation.
2. MMC will provide a letter to the applicant confirming the qualifications of the PI and all persons involved in the archaeological monitoring of the project meet the qualifications established in the HRG.

3. Prior to the start of work, the applicant must obtain written approval from MMC for any personnel changes associated with the monitoring program.

II. Prior to Start of Construction

A. Verification of Records Search

1. The PI shall provide verification to MMC that a site-specific records search (1/4 mile radius) has been completed. Verification includes, but is not limited to a copy of a confirmation letter from South Coastal Information Center, or, if the search was in-house, a letter of verification from the PI stating that the search was completed.
2. The letter shall introduce any pertinent information concerning expectations and probabilities of discovery during trenching and/or grading activities.
3. The PI may submit a detailed letter to MMC requesting a reduction to the ¼ mile radius.

B. PI Shall Attend Precon Meetings

1. Prior to beginning any work that requires monitoring; the Applicant shall arrange a Precon Meeting that shall include the PI, Native American consultant/monitor (where Native American resources may be impacted), Construction Manager (CM) and/or Grading Contractor, Resident Engineer (RE), Building Inspector (BI), if appropriate, and MMC. The qualified Archaeologist and Native American Monitor shall attend any grading/excavation related Precon Meetings to make comments and/or suggestions concerning the Archaeological Monitoring program with the Construction Manager and/or Grading Contractor.
    a. If the PI is unable to attend the Precon Meeting, the Applicant shall schedule a focused Precon Meeting with MMC, the PI, RE, CM or BI, if appropriate, prior to the start of any work that requires monitoring.
2. Identify Areas to be Monitored

    Prior to the start of any work that requires monitoring, the PI shall submit an Archaeological Monitoring Exhibit (AME) (with verification that the AME has been reviewed and approved by the Native American consultant/monitor when Native American resources may be impacted) based on the appropriate construction documents (reduced to 11x17) to MMC identifying the areas to be monitored including the delineation of grading/excavation limits.

    The AME shall be based on the results of a site-specific records search as well as information regarding existing known soil conditions (native or formation).
3. When Monitoring Will Occur
    a. Prior to the start of any work, the PI shall also submit a construction schedule to MMC through the RE indicating when and where monitoring will occur.
    b. The PI may submit a detailed letter to MMC prior to the start of work or during construction requesting a modification to the monitoring program. This request shall be based on relevant information such as review of final construction documents which indicate site conditions such as depth of excavation and/or site graded to bedrock, etc., which may reduce or increase the potential for resources to be present.

III. During Construction

A. Monitor(s) Shall be Present During Grading/Excavation/Trenching

1. The Archaeological Monitor shall be present full-time during all soil disturbing and grading/excavation/trenching activities which could result in impacts to archaeological resources as identified on the AME. The Construction Manager is responsible for notifying the RE, PI, and MMC of changes to any construction activities such as in the case of a potential safety concern within the area being monitored. In certain circumstances OSHA safety requirements may necessitate modification of the AME.
2. The Native American consultant/monitor shall determine the extent of their presence during soil disturbing and grading/excavation/trenching activities based on the AME and provide that information to the PI and MMC. If prehistoric resources are encountered during the Native American consultant/monitor's absence, work shall stop and the Discovery Notification Process detailed in Section III.B-C and IV.A-D shall commence.
3. The PI may submit a detailed letter to MMC during construction requesting a modification to the monitoring program when a field condition such as modern disturbance post-dating the previous grading/trenching activities, presence of fossil formations, or when native soils are encountered that may reduce or increase the potential for resources to be present.
4. The archaeological and Native American consultant/monitor shall document field activity via the Consultant Site Visit Record (CSVR). The CSVR's shall be faxed or emailed by the CM to the RE the first day of monitoring, the last day of monitoring, monthly (Notification of Monitoring Completion), and in the case of ANY discoveries. The RE shall forward copies to MMC.

B. Discovery Notification Process
   1. In the event of a discovery, the Archaeological Monitor shall direct the contractor to temporarily divert all soil disturbing activities, including but not limited to digging, trenching, excavating or grading activities in the area of discovery and in the area reasonably suspected to overlay adjacent resources and immediately notify the RE or BI, as appropriate.
   2. The Monitor shall immediately notify the PI (unless Monitor is the PI) of the discovery.
   3. The PI shall immediately notify MMC by phone of the discovery, and shall also submit written documentation to MMC within 24 hours by fax or email with photos of the resource in context, if possible.
   4. No soil shall be exported off-site until a determination can be made regarding the significance of the resource specifically if Native American resources are encountered.

C. Determination of Significance
   1. The PI and Native American consultant/monitor, where Native American resources are discovered shall evaluate the significance of the resource. If Human Remains are involved, follow protocol in Section IV below.
      a. The PI shall immediately notify MMC by phone to discuss significance determination and shall also submit a letter to MMC indicating whether additional mitigation is required.

b. If the resource is significant, the PI shall submit an Archaeological Data Recovery Program (ADRP) which has been reviewed by the Native American consultant/monitor, and obtain written approval from MMC. Impacts to significant resources must be mitigated before ground disturbing activities in the area of discovery will be allowed to resume. Note: If a unique archaeological site is also an historical resource as defined in Guidelines Section, then the limits on the amount(s) that a project applicant may be required to pay to cover mitigation costs as indicated in CEQA Section 21083.2 shall not apply.
c. If the resource is not significant, the PI shall submit a letter to MMC indicating that artifacts will be collected, curated, and documented in the Final Monitoring Report. The letter shall also indicate that that no further work is required.

IV. Discovery of Human Remains

If human remains are discovered, work shall halt in that area and no soil shall be exported off-site until a determination can be made regarding the provenance of the human remains; and the following procedures as set forth in CEQA Section 15064.5(e), the California Public Resources Code (Sec. 5097.98) and State Health and Safety Code (Sec. 7050.5) shall be undertaken:

A. Notification
1. Archaeological Monitor shall notify the RE or BI as appropriate, MMC, and the PI, if the Monitor is not qualified as a PI. MMC will notify the appropriate Senior Planner in the Environmental Analysis Section (EAS) of the Development Services Department to assist with the discovery notification process.
2. The PI shall notify the Medical Examiner after consultation with the RE, either in person or via telephone.

B. Isolate discovery site
1. Work shall be directed away from the location of the discovery and any nearby area reasonably suspected to overlay adjacent human remains until a determination can be made by the Medical Examiner in consultation with the PI concerning the provenance of the remains.
2. The Medical Examiner, in consultation with the PI, will determine the need for a field examination to determine the provenance.
3. If a field examination is not warranted, the Medical Examiner will determine with input from the PI, if the remains are or are most likely to be of Native American origin.

C. If Human Remains ARE determined to be Native American
1. The Medical Examiner will notify the Native American Heritage Commission (NAHC) within 24 hours. By law, ONLY the Medical Examiner can make this call.
2. NAHC will immediately identify the person or persons determined to be the Most Likely Descendent (MLD) and provide contact information.
3. The MLD will contact the PI within 24 hours or sooner after the Medical Examiner has completed coordination, to begin the consultation process in accordance with CEQA Guidelines Section 15064.5(e), the California Public Resources and Health & Safety Codes.

4. The MLD will have 48 hours to make recommendations to the property owner or representative, for the treatment or disposition with proper dignity, of the human remains and associated grave goods.
5. Disposition of Native American Human Remains will be determined between the MLD and the PI, and, if:
   a. The NAHC is unable to identify the MLD, OR the MLD failed to make a recommendation within 48 hours after being granted access to the site, OR;
   b. The landowner or authorized representative rejects the recommendation of the MLD and mediation in accordance with PRC 5097.94 (k) by the NAHC fails to provide measures acceptable to the landowner, the landowner shall reinter the human remains and items associated with Native American human remains with appropriate dignity on the property in a location not subject to further and future subsurface disturbance, THEN
   c. To protect these sites, the landowner shall do one or more of the following:
      (1) Record the site with the NAHC;
      (2) Record an open space or conservation easement; or
      (3) Record a document with the County. The document shall be titled "Notice of Reinterment of Native American Remains" and shall include a legal description of the property, the name of the property owner, and the owner's acknowledged signature, in addition to any other information required by PRC 5097.98. The document shall be indexed as a notice under the name of the owner.

V. Night and/or Weekend Work

A. If night and/or weekend work is included in the contract
   1. When night and/or weekend work is included in the contract package, the extent and timing shall be presented and discussed at the precon meeting.
   2. The following procedures shall be followed.
      a. No Discoveries
         In the event that no discoveries were encountered during night and/or weekend work, the PI shall record the information on the CSVR and submit to MMC via fax by 8AM of the next business day.
      b. Discoveries
         All discoveries shall be processed and documented using the existing procedures detailed in Sections III - During Construction, and IV – Discovery of Human Remains. Discovery of human remains shall always be treated as a significant discovery.
      c. Potentially Significant Discoveries
         If the PI determines that a potentially significant discovery has been made, the procedures detailed under Section III - During Construction and IV-Discovery of Human Remains shall be followed.
      d. The PI shall immediately contact MMC, or by 8AM of the next business day to report and discuss the findings as indicated in Section III-B, unless other specific arrangements have been made.

B. If night and/or weekend work becomes necessary during the course of construction
   1. The Construction Manager shall notify the RE, or BI, as appropriate, a minimum of 24 hours before the work is to begin.

2. The RE, or BI, as appropriate, shall notify MMC immediately.

C. All other procedures described above shall apply, as appropriate.

VI. Post Construction

A. Preparation and Submittal of Draft Monitoring Report

1. The PI shall submit two copies of the Draft Monitoring Report (even if negative), prepared in accordance with the Historical Resources Guidelines (Appendix C/D) which describes the results, analysis, and conclusions of all phases of the Archaeological Monitoring Program (with appropriate graphics) to MMC for review and approval within 90 days following the completion of monitoring. It should be noted that if the PI is unable to submit the Draft Monitoring Report within the allotted 90-day timeframe resulting from delays with analysis, special study results or other complex issues, a schedule shall be submitted to MMC establishing agreed due dates and the provision for submittal of monthly status reports until this measure can be met.
    a. For significant archaeological resources encountered during monitoring, the Archaeological Data Recovery Program shall be included in the Draft Monitoring Report.
    b. Recording Sites with State of California Department of Parks and Recreation The PI shall be responsible for recording (on the appropriate State of California Department of Park and Recreation forms-DPR 523 A/B) any significant or potentially significant resources encountered during the Archaeological Monitoring Program in accordance with the City's Historical Resources Guidelines, and submittal of such forms to the South Coastal Information Center with the Final Monitoring Report.
2. MMC shall return the Draft Monitoring Report to the PI for revision or, for preparation of the Final Report.
3. The PI shall submit revised Draft Monitoring Report to MMC for approval.
4. MMC shall provide written verification to the PI of the approved report.
5. MMC shall notify the RE or BI, as appropriate, of receipt of all Draft Monitoring Report submittals and approvals.

B. Handling of Artifacts

1. The PI shall be responsible for ensuring that all cultural remains collected are cleaned and catalogued
2. The PI shall be responsible for ensuring that all artifacts are analyzed to identify function and chronology as they relate to the history of the area; that faunal material is identified as to species; and that specialty studies are completed, as appropriate.
3. The cost for curation is the responsibility of the property owner.

C. Curation of artifacts: Accession Agreement and Acceptance Verification

1. The PI shall be responsible for ensuring that all artifacts associated with the survey, testing and/or data recovery for this project are permanently curated with an appropriate institution. This shall be completed in consultation with MMC and the Native American representative, as applicable.
2. The PI shall include the Acceptance Verification from the curation institution in the Final Monitoring Report submitted to the RE or BI and MMC.

3. When applicable to the situation, the PI shall include written verification from the Native American consultant/monitor indicating that Native American resources were treated in accordance with state law and/or applicable agreements. If the resources were reinterred, verification shall be provided to show what protective measures were taken to ensure no further disturbance occurs in accordance with Section IV – Discovery of Human Remains, Subsection 5.

D. Final Monitoring Report(s)
   1. The PI shall submit one copy of the approved Final Monitoring Report to the RE or BI as appropriate, and one copy to MMC (even if negative), within 90 days after notification from MMC that the draft report has been approved.
   2. The RE shall, in no case, issue the Notice of Completion and/or release of the Performance Bond for grading until receiving a copy of the approved Final Monitoring Report from MMC which includes the Acceptance Verification from the curation institution.

TRANSPORTATION/CIRCULATION

Mitigation Framework TRF-1: Intersections shall be improved per the intersection lane designations identified in [OMCPU PEIR] Figure 5.12-4.

MM-3 Prior to the issuance of the first building permit, the Owner/Permittee shall assure by permit and bond the restriping of the westbound approach to accommodate dual left-turn lanes and three through lanes and associated traffic signal modification at the intersection of Britannia Boulevard & Otay Mesa Road per current City standards, satisfactory to the City Engineer. All improvements shall be completed and operational prior to first occupancy.

MM-4 Prior to the issuance of the first building permit, the Owner/Permittee shall assure by permit and bond the restriping of the westbound off-ramp approach to accommodate an exclusive left-turn lane, a shared left-through-right lane, an exclusive right-turn, and associated traffic signal modification at the intersection of Britannia Boulevard & SR-905 Westbound Ramps per current City standards and Caltrans standards, satisfactory to the City Engineer. All improvements shall be completed and operational prior to first occupancy. These recommended mitigation measures are consistent with the ultimate intersection geometrics assumption of the OMCPU PEIR's analysis of traffic at OMCPU buildout.

MM-5 Prior to the issuance of the first building permit, the Owner/Permittee shall assure by permit and bond the reconfiguration of the northbound approach to accommodate two through lanes and a shared through-right lane and associated traffic signal modification at the intersection of Britannia Boulevard & SR-905 Eastbound Ramps per current City standards and Caltrans standards, satisfactory to the City Engineer and Caltrans. All improvements shall be completed and operational prior to first occupancy. These recommended mitigation measures are consistent with the ultimate intersection geometrics assumption of the OMCPU PEIR's analysis of traffic at OMCPU buildout.

MM-6 Prior to the issuance of the first building permit, the Owner/Permittee shall assure by permit and bond to restripe the eastbound approach to accommodate 400-foot dual left-turn lanes

and a shared through-right turn lane and restripe the southbound approach to accommodate a left-turn lane, one through lane and dual right-turn lanes and associated traffic signal modification at the intersection of Britannia Boulevard and Airway Road per current City standards, satisfactory to the City Engineer. All improvements shall be completed and operational prior to first occupancy.

MM-7 Prior to the issuance of the first building permit, the Owner/Permittee shall assure by permit and bond the signalization of the Continental Street and Airway Road intersection. The following lane configuration shall be constructed at the intersection per current City standards:

- Southbound approach: left-turn pocket and a right-turn lane
- Eastbound approach: left-turn pocket and a through lane
- West leg: configured with two receiving lanes
- Westbound Approach: one through lane and shared through right turn lane

All improvements shall be satisfactory to the City Engineer and shall be completed and operational prior to first occupancy.

MM-8 Prior to the issuance of the first building permit, the Owner/Permittee shall assure by permit and bond the reconfiguration of the Cactus Road and Airway Road intersection with the following lane configuration:

- North leg: configured with two receiving lanes
- Westbound approach: one left-turn lane and one right-turn lane

All improvements shall be satisfactory to the City Engineer and shall be completed and operational prior to first occupancy.

MM-9 Prior to the issuance of any building permit, the Owner/Permittee shall assure by permit and bond to improve Britannia Boulevard between SR-905 Eastbound Ramps and Airway Road from a 5-Lane Prime Arterial (2 NB/3 SB) to a 6-Lane Prime Arterial per current City standards and Caltrans standards, satisfactory to the City Engineer and Caltrans. This improvement shall include the reconstruction of the existing raised median to provide an additional northbound lane and restriping the existing pavement to accommodate this roadway configuration. This improvement does not require widening the existing curb-to-curb width along the segment. All improvements shall be completed and operational prior to first occupancy.

MM-10 Prior to the issuance of any building permit, the Owner/Permittee shall assure by permit and bond to improve Airway Road between Continental Street and Britannia Boulevard from a 2-Lane Collector to a 3-Lane (1EB/2WB) Collector per current City standards, satisfactory to the City Engineer. This improvement shall include restriping the existing right-of-way to accommodate this roadway configuration. All improvements shall be completed and operational prior to first occupancy.

MM-11 Prior to the issuance of any building permit, the Owner/Permittee shall assure by permit and bond to improve Airway Road between Britannia Boulevard and 50 feet west of La Media Road from a 2-Lane Collector to a 2-Lane Collector with a two-way center left-turn lane per current City standards, satisfactory to the City Engineer. This improvement shall include restriping the existing right-of-way to accommodate this roadway configuration and removal of parking along the roadway. This improvement does not require widening of existing right-of-way. All improvements shall be completed and operational prior to first occupancy.

MM-12 Prior to the issuance of any building permit, the Owner/Permittee shall assure by permit and bond to improve Cactus Road south of Airway Road from a 2-Lane Collector to a 3-Lane (1NB/2SB) Major Arterial, satisfactory to the City Engineer. This improvement shall include the construction of a raised median and restriping within the existing pavement to accommodate this lane configuration. All improvements shall be completed and operational prior to first occupancy.

IX. CERTIFICATION

Copies of the addendum, certified PEIR, Mitigation Monitoring and Reporting Program, and associated project-specific technical appendices, if any, may be accessed on the City's CEQA webpage at https://www.sandiego.gov/ceqa/final.

Jeffrey Szymanski

Jeff Szymanski
Senior Planner
Development Services Department

March 25, 2026
Date of Final Report

Analyst: K. RASMUS

Attachments:

- Figure 1: Regional Map
- Figure 2 – Land Use Plan
- Figure 3 – Vesting Tentative Map No. 3273796
- Figure 4 – Aerial Photograph
- Figure 5 - Vicinity Map
- Figure 6 – Transportation Study Area

Technical Appendices (provided under separate cover)

- Technical Appendix A – Biological Technical Report
- Technical Appendix B1 – Geotechnical Report
- Technical Appendix B2 – Geotechnical Update Letter
- Technical Appendix C – Extended Phase I Cultural Resources Report
- Technical Appendix E – Preliminary Drainage Report
- Technical Appendix F – Noise Report
- Technical Appendix G – Traffic Impact Study
- Technical Appendix H – Sewer Study
- Technical Appendix I – Water Supply
- Technical Appendix J – Waste Management Plan
- Technical Appendix K1- Phase I Environmental Site Assessment
- Technical Appendix K2 – Limited Phase II Environmental Site Assessment
- Technical Appendix L – Soil Management Plan

IX. REFERENCES

The following documents were referenced as information sources during the preparation of this document.

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(Alden Environmental, 2025)	Alden Environmental, Inc. 2025. *Biological Technical Report for the Collection at Cactus Project*. November 7, 2025. Included as *Technical Appendix A.*
(Bowman, 2024)	Bowman. 2024. *Preliminary Drainage Report*. November 25, 2024. Included as *Technical Appendix E.*
(C Young Associates, 2024)	C Young Associates. 2024. *Soil Management Plan*, August 20, 2024. Included as *Technical Appendix L.*
(City of San Diego, 2012)	City of San Diego. 2012. *LDC Biology Guidelines*. Retrieved from https://www.sandiego.gov/sites/default/files/legacy/development-services/pdf/industry/landdevmanual/ldmbio.pdf
(City of San Diego, 2014)	City of San Diego. 2014. *Otay Mesa Community Plan Update Draft Environmental Impact Report.* February 21, 2014.
(City of San Diego, 2018b)	City of San Diego. 2018. *LDC Biology Guidelines*. February 1, 2018.
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(CRA, 2026)	CR Associates, 2026. *The Collection at Cactus (PRJ-1111415) – Transportation Impact Study*. February 2026. Included as *Technical Appendix G.*
(Dexter Wilson, 2025a)	Dexter Wilson Engineering, Inc. 2025. *Sewer Study*. July 23, 2025. Included as *Technical Appendix H.*
(Dexter Wilson, 2025b)	Dexter Wilson Engineering, Inc. 2025. *Subarea Master Plan*. December 11, 2025. Included as *Technical Appendix I.*
(Dudek, 2025)	Dudek. 2025. *Cultural Resources Extended Phase I Inventory Report.* May 2025. Included as *Technical Appendix C.*
(Dudek, 2024a)	Dudek. 2024. *Paleontological Resources Inventory Report for the Collection at Cactus Apartments Project, City of San Diego, California*. June 11, 2024. Included as *Technical Appendix D.*
(Dudek, 2024b)	Dudek. 2024. *Noise Technical Report*. November 2024. Included as *Technical Appendix F.*

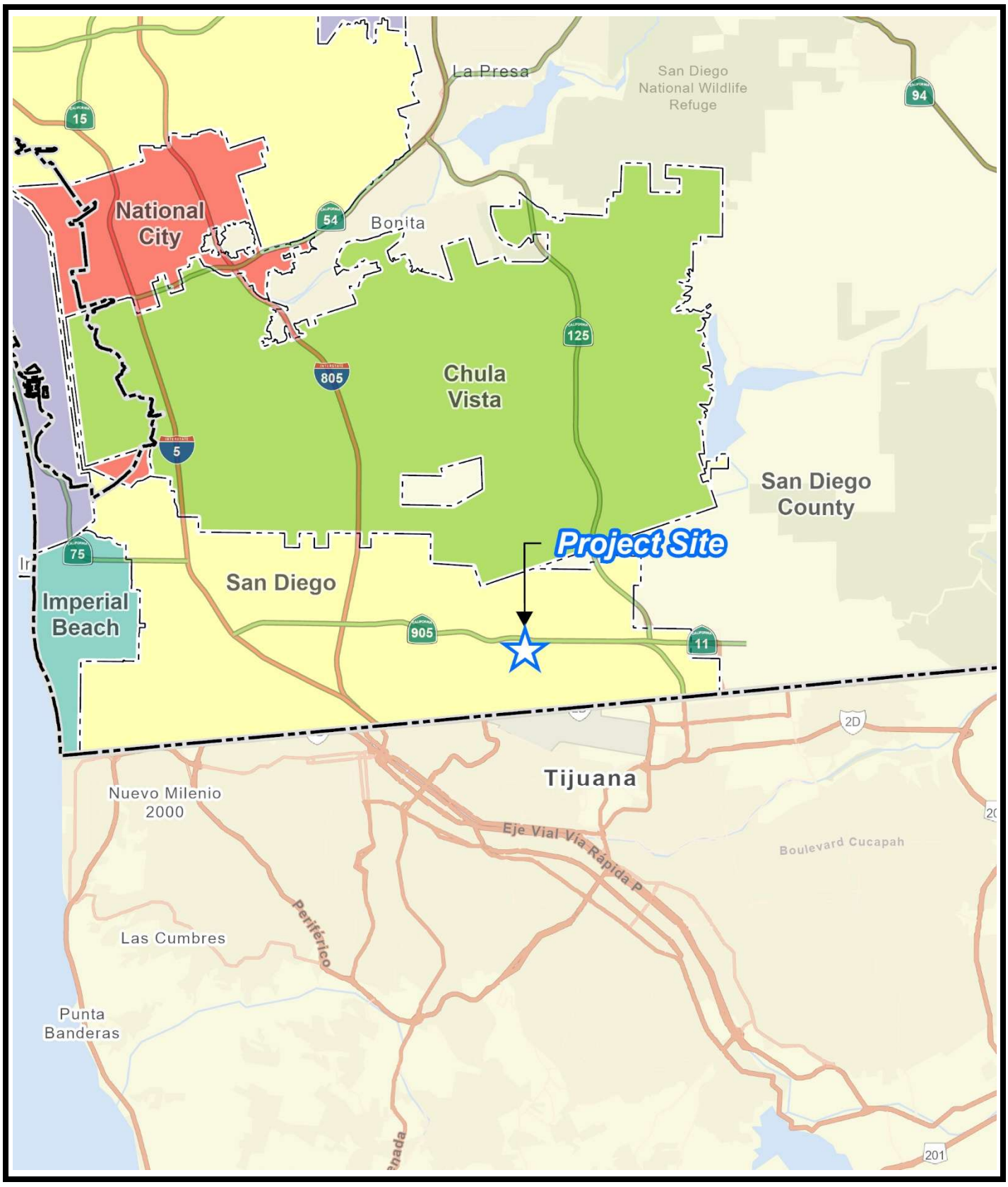
(Geocon, 2023) Geocon, Inc. 2023. *Due Diligence Geotechnical Investigation*. May 18, 2023. Included as *Technical Appendix B1.*

(Geocon, 2024) Geocon, Inc., 2024. *Update Letter and Response to City of San Diego Review Comments*. August 9, 2024. Included as *Technical Appendix B2.*

(Hillmann, 2023a) Hillmann Consulting. 2023. *Phase I Environmental Site Assessment.* May 1, 2023. Included as *Technical Appendix K1*.

(Hillmann, 2023b) Hillmann Consulting. 2023. *Limited Phhase II Subsurface Investigation Report*. August 16, 2023. Included as *Technical Appendix K2*.

(T&B Planning, 2024) T&B Planning, Inc. 2024. *Waste Management Plan*. May 21, 2024. Included as *Technical Appendix J*.



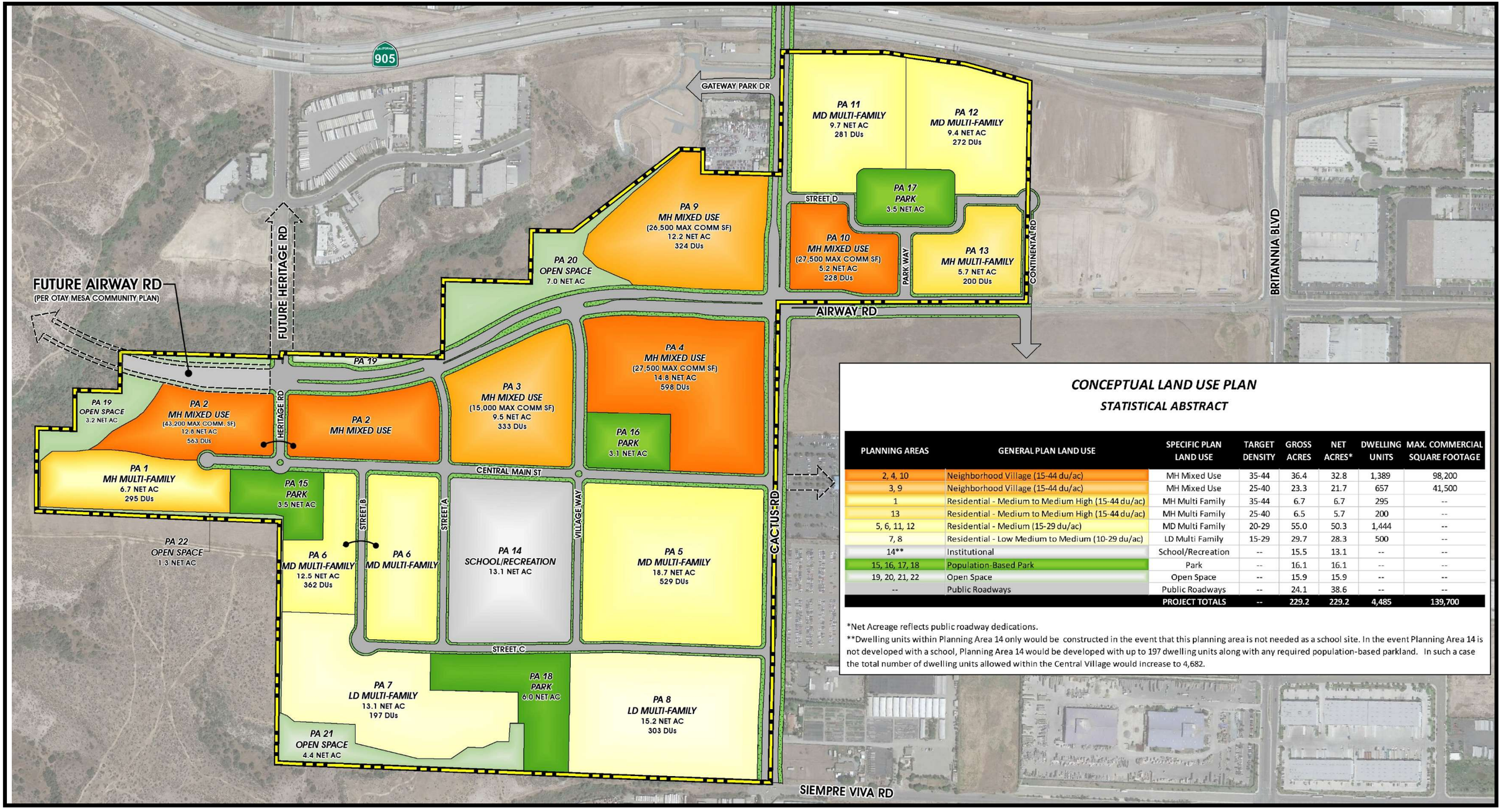
The City of SAN DIEGO

Regional Map

The Collection at Cactus/PRJ-1111415

Development Services Department

FIGURE No. 1



CONCEPTUAL LAND USE PLAN

STATISTICAL ABSTRACT

PLANNING AREAS	GENERAL PLAN LAND USE	SPECIFIC PLAN LAND USE	TARGET DENSITY	GROSS ACRES	NET ACRES*	DWELLING UNITS	MAX. COMMERCIAL SQUARE FOOTAGE
2, 4, 10	Neighborhood Village (15-44 du/ac)	MH Mixed Use	35-44	36.4	32.8	1,389	98,200
3, 9	Neighborhood Village (15-44 du/ac)	MH Mixed Use	25-40	23.3	21.7	657	41,500
1	Residential - Medium to Medium High (15-44 du/ac)	MH Multi Family	35-44	6.7	6.7	295	--
13	Residential - Medium to Medium High (15-44 du/ac)	MH Multi Family	25-40	6.5	5.7	200	--
5, 6, 11, 12	Residential - Medium (15-29 du/ac)	MD Multi Family	20-29	55.0	50.3	1,444	--
7, 8	Residential - Low Medium to Medium (10-29 du/ac)	LD Multi Family	15-29	29.7	28.3	500	--
14**	Institutional	School/Recreation	--	15.5	13.1	--	--
15, 16, 17, 18	Population-Based Park	Park	--	16.1	16.1	--	--
19, 20, 21, 22	Open Space	Open Space	--	15.9	15.9	--	--
--	Public Roadways	Public Roadways	--	24.1	38.6	--	--
		PROJECT TOTALS	--	229.2	229.2	4,485	139,700

*Net Acreage reflects public roadway dedications.

**Dwelling units within Planning Area 14 only would be constructed in the event that this planning area is not needed as a school site. In the event Planning Area 14 is not developed with a school, Planning Area 14 would be developed with up to 197 dwelling units along with any required population-based parkland. In such a case the total number of dwelling units allowed within the Central Village would increase to 4,682.

The City of SAN DIEGO

Land Use Plan

The Collection at Cactus/PRJ-1111415

Development Services Department

FIGURE No. 2

VESTED TENTATIVE MAP NO. 3273796, NEIGHBORHOOD DEVELOPMENT PERMIT NO. 3273796 AND SITE DEVELOPMENT PERMIT PMT-3398899
FOR
COLLECTION AT CACTUS

SOURCE OF TOPOGRAPHY
AERIAL TOPOGRAPHY BY BOWMAN CONSULTING GROUP
DATED: JUNE 9, 2022 . CONTOURS AT 1' INTERVAL

BOWMAN CONSULTING GROUP
(619) 235-6471
701 'B' STREET, SUITE 800
SAN DIEGO, CA 92101

LEGAL DESCRIPTION
REAL PROPERTY IN THE CITY OF SAN DIEGO, COUNTY OF SAN DIEGO, STATE OF CALIFORNIA, DESCRIBED AS FOLLOWS:

THE SOUTHWEST QUARTER OF THE NORTHEAST QUARTER OF SECTION 33, TOWNSHIP 18 SOUTH, RANGE 1 WEST, SAN BERNARDINO BASE AND MERIDIAN, IN THE COUNTY OF SAN DIEGO, STATE OF CALIFORNIA, ACCORDING TO UNITED STATES GOVERNMENT SURVEY THEREOF.

EXCEPTING THEREFROM THAT PORTION DESCRIBED IN FINAL ORDER OF CONDEMNATION RECORDED JULY 13, 2007 AS INSTRUMENT NO. 2007-0459983 OF OFFICIAL RECORDS.

ALSO EXCEPTING THEREFROM THAT PORTION DESCRIBED IN FINAL ORDER OF CONDEMNATION RECORDED OCTOBER 12, 2010 AS INSTRUMENT NO. 2010-0547452 OF OFFICIAL RECORDS.

BASIS OF BEARINGS
THE BASIS OF BEARINGS FOR THIS MAP IS THE CALIFORNIA COORDINATE SYSTEM OF 1983, ZONE 6, EPOCH 1991.35 AND IS DETERMINED BY G.P.S. MEASUREMENTS TAKEN ON APRIL 2018 AT POINT 'A' AND 'B' SHOWN HEREON. SAID POINTS WERE ESTABLISHED FROM FIRST ORDER G.P.S. STATION NO. 209 AND FIRST ORDER G.P.S. STATION NO. 189 PER RECORD OF SURVEY NO. 14492.

BEARING FROM POINT 'A' TO 'B' IS: NORTH 00°56'15" WEST

DISTANCES SHOWN HEREON ARE GROUND LEVEL DISTANCES. THE COMBINED GRID FACTOR AT POINT 'A' IS 1.0000288.

GRID DISTANCE = GROUND DISTANCE X COMBINED GRID FACTOR. ELEVATION AT POINT 'A' IS 474.95' (N.G.V.D. 29)

QUOTED BEARINGS FROM REFERENCE DEEDS/MAPS MAY OR MAY NOT BE IN TERMS OF SAID SYSTEM.

BENCHMARK
CITY OF SAN DIEGO BRASS PLUG AT THE N.E. INTERSECTION OF OTAY MESA ROAD AND HERITAGE ROAD.

ELEVEATION: 504.00' M.S.L. DATUM (N.G.V.D. 29)

ASSESSOR'S PARCEL NUMBERS
APN 646-103-0100

CURRENT VESTED OWNER
TITLE TO SAID ESTATE OR INTEREST AT THE DATE HEREOF IS VESTED IN:
JOSEPH PAEZ, JR., SINGLE MAN

OWNER
JPI REAL ESTATE ACQUISITION II, LLC
11988 EL CAMINO REAL STE 200
SAN DIEGO, CA 92130
CONNER.KLOEPPEL@JPI.COM
(314) 302-2469

ENGINEER OF RECORD
BOWMAN CONSULTING GROUP LTD.
701 B STREET STE. 800
SAN DIEGO, CA 92101
(619) 235-6471

GEOTECHNICAL
GEOCON INCORPORATED
6960 FLANDERS DRIVE
SAN DIEGO, CA 92121
(858) 558-6900

LANDSCAPE ARCHITECT
BOWMAN CONSULTING GROUP LTD.
701 B STREET STE. 800
SAN DIEGO, CA 92101
(619) 235-6471

REFERENCE DRAWINGS
21305-D; TRUNK SEWER PUMP STATION
RECORD OF SURVEY (ROS) 22398;
ALTA/ACSM LAND TITLE SURVEY-COLRICH OTAY CANYON RANCH
23871-D, 24016-D, 24211-D, 25183-D

SITE AREA
38.80 ACRES

NAD27 + NAD83
CCS 83 COORDINATES: 1784-3-6331
NAD 27 COORDINATES: 144-1771

GRADING TABULATION
TOTAL AMOUNT OF ON-SITE TO BE GRADED AREA 37.97 AC.; OR 100.0% OF TOTAL PROJECT SITE.
AMOUNT OF CUT (GEOMETRIC): 17,550 CY AND MAXIMUM DEPTH OF CUT: 4 FT
AMOUNT OF FILL (GEOMETRIC): 60,475 CY AND MAXIMUM DEPTH OF FILL: 5 FT
AMOUNT OF IMPORT: 42,925 CY

RETAINING WALLS LENGTH: 603 FT MAXIMUM HEIGHT: 8.5 FT (MAXIMUM EXPOSED HEIGHT).

SHEET INDEX

VESTED TENTATIVE MAP
KEY MAP, LEGEND, & NOTES C001
STREET SECTIONS C002-C003
EXISTING TOPOGRAPHY & EASEMENTS, PROPOSED ROW C004
SITE GRADING AND DRAINAGE PLAN C005
SITE DOMESTIC WATER, FIRE AND SEWER PLAN C006
STRIPING PLAN C007
STEEP SLOPE ANALYSIS C008

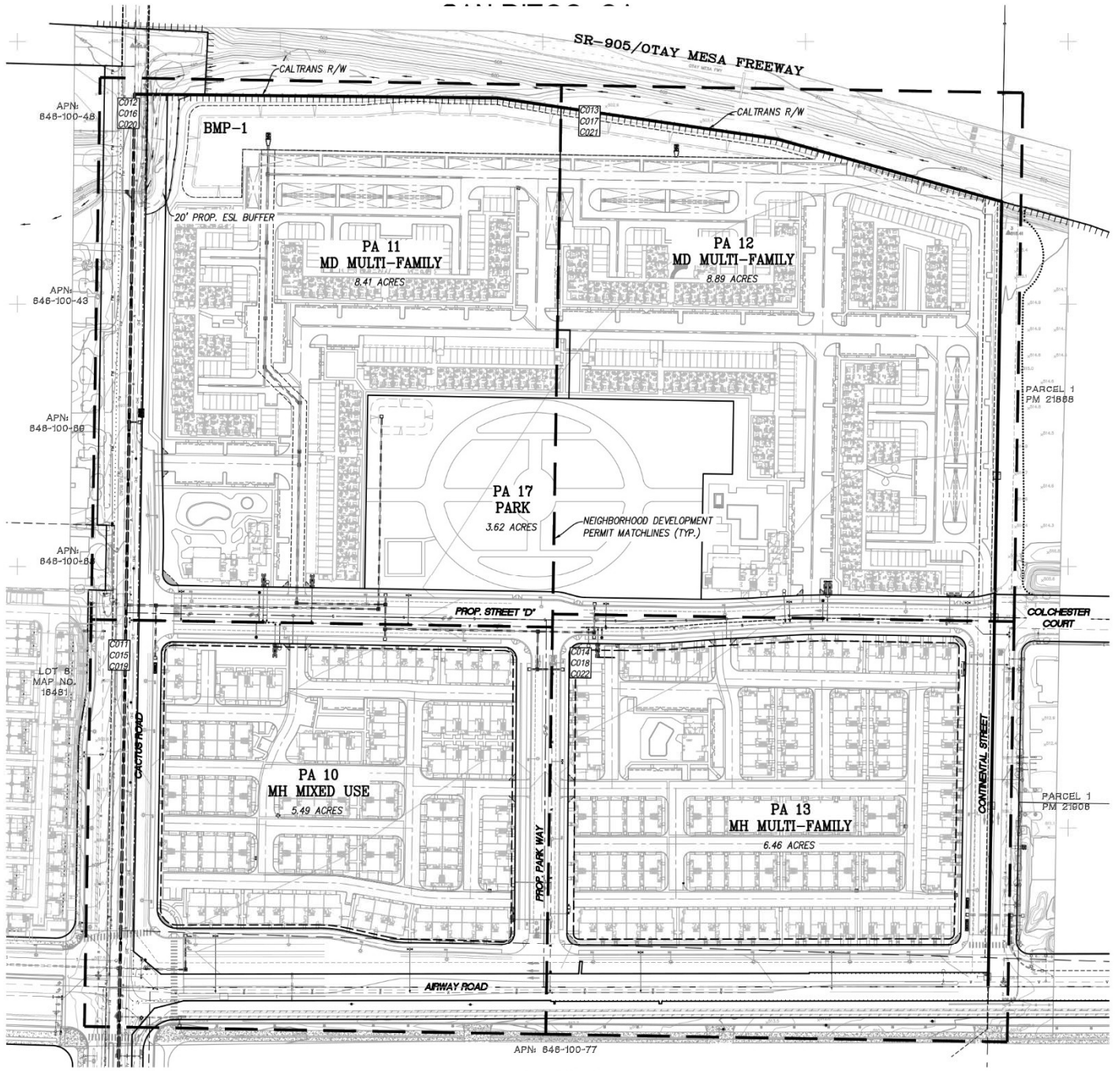
NEIGHBORHOOD DEVELOPMENT PERMIT
SECTIONS C009-C010
CONCEPTUAL GRADING AND DRAINAGE PLAN C011-C014
CONCEPTUAL WATER, FIRE, SEWER PLAN C015-C018
HORIZONTAL CONTROL PLAN C019-C022
FIRE ACCESS PLAN C023
ACCESSIBILITY PLAN C024
BMP PLAN C025
BMP DETAILS C026
SIGHT DISTANCE C027

DECLARATION OF RESPONSIBLE CHARGE
I HEREBY DECLARE THAT I AM THE ENGINEER OF WORK FOR THIS PROJECT, THAT I HAVE EXERCISED RESPONSIBLE CHARGE OVER THE DESIGN OF THE PROJECT AS DEFINED IN SECTION 6703 OF THE BUSINESS AND PROFESSIONS CODE, AND THAT IN MY PROFESSIONAL OPINION THE DESIGN IS CONSISTENT WITH CURRENT STANDARDS.

I UNDERSTAND THAT THE CHECK OF PROJECT DRAWINGS AND SPECIFICATIONS BY THE CITY OF SAN DIEGO IS CONFINED TO A REVIEW ONLY AND DOES NOT RELIEVE ME, AS ENGINEER OF WORK, OF MY RESPONSIBILITY FOR PROJECT DESIGN.

REGISTERED PROFESSIONAL ENGINEER GREGORY M. SHIELDS No. 42951 Exp. 03-31-24 CIVIL STATE OF CALIFORNIA

GREGORY M. SHIELDS, RCE 42951 DATE



KEY MAP
SCALE: 1" = 100'



VICINITY MAP
NO SCALE

LEGEND
EXISTING
- EXISTING STREET CENTERLINE
- EXISTING RIGHT-OF-WAY
- EXISTING LOT LINE
- EXISTING CURB AND GUTTER
- EXISTING CONTOUR
- EXISTING FENCE
- EXISTING TREE
- EXISTING STORM DRAIN PIPE
- EXISTING DRAINAGE INLET
- EXISTING SEWER
- EXISTING SEWER MANHOLE
- EXISTING WATER
- EXISTING FORCE MAIN
- EXISTING SDG&E OVERHEAD ELECTRIC

PROPOSED
- NEIGHBORHOOD DEVELOPMENT PERMIT MATCHLINE
- PROPERTY LINE/TM BOUNDARY
- PROPOSED RIGHT OF WAY
- PROPOSED CENTERLINE
- PROPOSED ESL FENCE PER LANDSCAPE PLANS
- PROPOSED CURB AND GUTTER (SDG-151, SDG-156)
- PROPOSED PARKWAY & SIDEWALK (SDG-109, SDG-155)
- PROPOSED CURB MEDIAN (SDG-154)
- PROPOSED SIDEWALK
- PROPOSED CONTINENTAL CROSS WALK
- PROPOSED 25' DRIVEWAY (SDG-160)
- PROPOSED CURB RAMP (SDG-130, SDG-132)
- PROPOSED CENTERLINE ELEVATIONS
- PROPOSED FLOWLINE ELEVATIONS
- PROPOSED DIRECTIONAL FLOW
- PROPOSED CONTOUR
- MHPA LINE
- PROPOSED DAYLIGHT
- PROPOSED BERM
- PROPOSED SLOPE (2:1)
- PROPOSED STORM DRAIN PIPE
- PROPOSED SD HEADWALL & RIPRAP (D-41A, D-41B)
- PROPOSED SD RISER
- PROPOSED CURB INLET (SDD-116)
- PROPOSED STORM DRAIN CLEAN OUT (D-09)
- PROPOSED BROW DITCH (SDD-106)
- PROPOSED SEWER MAIN (SDS-102, 103, 105, 107, 108, 110)
- PROPOSED SEWER MANHOLE (SDS-107)
- PROPOSED FORCE MAIN
- PROPOSED WATER MAIN (SDW-110, 148, 151, WP-05, 07)
- PROPOSED GATE VALVE (SDW-109, 151-153, WV-04)
- PROPOSED ST. LIGHT (SDE-101, ST. DESIGN MANUAL)
- PROPOSED SIGHT VISIBILITY TRIANGLE (MUNICIPAL CODE 113.0273)

MAPPING NOTE
A FINAL MAP SHALL BE FILED AT THE COUNTY RECORDER'S OFFICE PRIOR THE EXPIRATION OF THE TENTATIVE MAP, IF APPROVED. A DETAILED PROCEDURE OF SURVEY SHALL BE SHOWN ON THE FINAL MAP AND ALL PROPERTY CORNERS SHALL BE MARKED WITH DURABLE SURVEY MONUMENTS.

CONDOMINIUM MAP NOTE
THIS SUBDIVISION IS A CONDOMINIUM PROJECT AS DEFINED IN SECTION 4125 OF THE CIVIL CODE OF THE STATE OF CALIFORNIA AND IS FILED PURSUANT TO THE SUBDIVISION MAP ACT. THE TOTAL NUMBER OF CONDOMINIUM UNITS WILL NOT EXCEED 985 UNITS.

NOTES
1. THE SUBJECT PROPERTY IS WITHIN THE OTAY WATER DISTRICT WATER SERVICE.
2. EXISTING POWER POLES THAT ARE WITHIN THE PROPOSED IMPROVEMENTS WILL BE UNDERGROUNDED AS REQUIRED BY SAN DIEGO MUNICIPAL CODE.
3. THIS VESTING TENTATIVE MAP PROPOSES THE SUBDIVISION OF A 38.80 ACRE SITE INTO FIVE LOTS, FOUR ARE TO BE MULTIFAMILY RESIDENTIAL AND ONE A PUBLIC PARK.
4. SUBDIVIDER SHALL ENSURE THAT ALL ONSITE UTILITIES SERVING THE SUBDIVISION SHALL BE UNDERGROUND WITH THE APPROPRIATE PERMITS.
5. PROPOSED AND EXISTING WATER AND SEWER DWD.
6. THE APPROXIMATE 3.62 AC PARK PARCEL KNOWN AS PA-17 WILL HAVE AN IRREVOCABLE OFFER TO DEDICATE (IOD) TO THE CITY OF SAN DIEGO.

KEY MAP
SCALE: 1" = 100'

UTILITY TABLE	
ONSITE PUBLIC WATER	UNDERGROUND UTILITY PER PUBLIC IMPROVEMENT PERMIT
ONSITE PUBLIC SEWER	UNDERGROUND UTILITY PER PUBLIC IMPROVEMENT PERMIT
ONSITE PUBLIC FIRE	UNDERGROUND UTILITY PER PUBLIC IMPROVEMENT PERMIT
ONSITE PUBLIC STORM DRAIN	UNDERGROUND UTILITY PER PUBLIC IMPROVEMENT PERMIT
ONSITE PRIVATE WATER	UNDERGROUND UTILITY PER PRIVATE IMPROVEMENT PERMIT
ONSITE PRIVATE SEWER	UNDERGROUND UTILITY PER PRIVATE IMPROVEMENT PERMIT
ONSITE PRIVATE FIRE	UNDERGROUND UTILITY PER PRIVATE IMPROVEMENT PERMIT
ONSITE PRIVATE STORM DRAIN	UNDERGROUND UTILITY PER PRIVATE IMPROVEMENT PERMIT

The City of SAN DIEGO

Vesting Tentative Map No.3273796
The Collection at Cactus/PRJ-1111415
Development Services Department

FIGURE No. 3



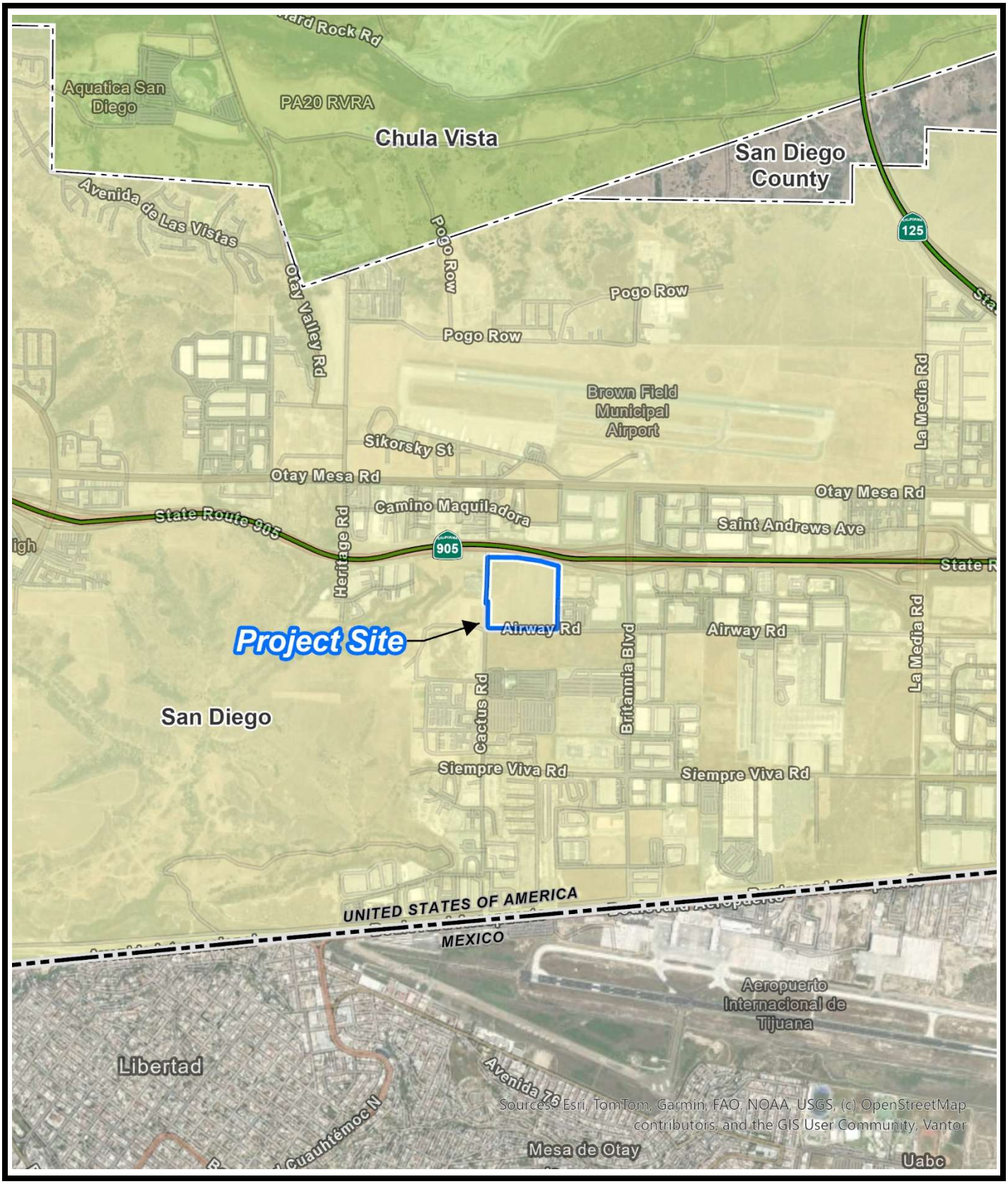
The City of SAN DIEGO

Aerial Photograph

The Collection at Cactus/PRJ-1111415

Development Services Department

FIGURE No. 4



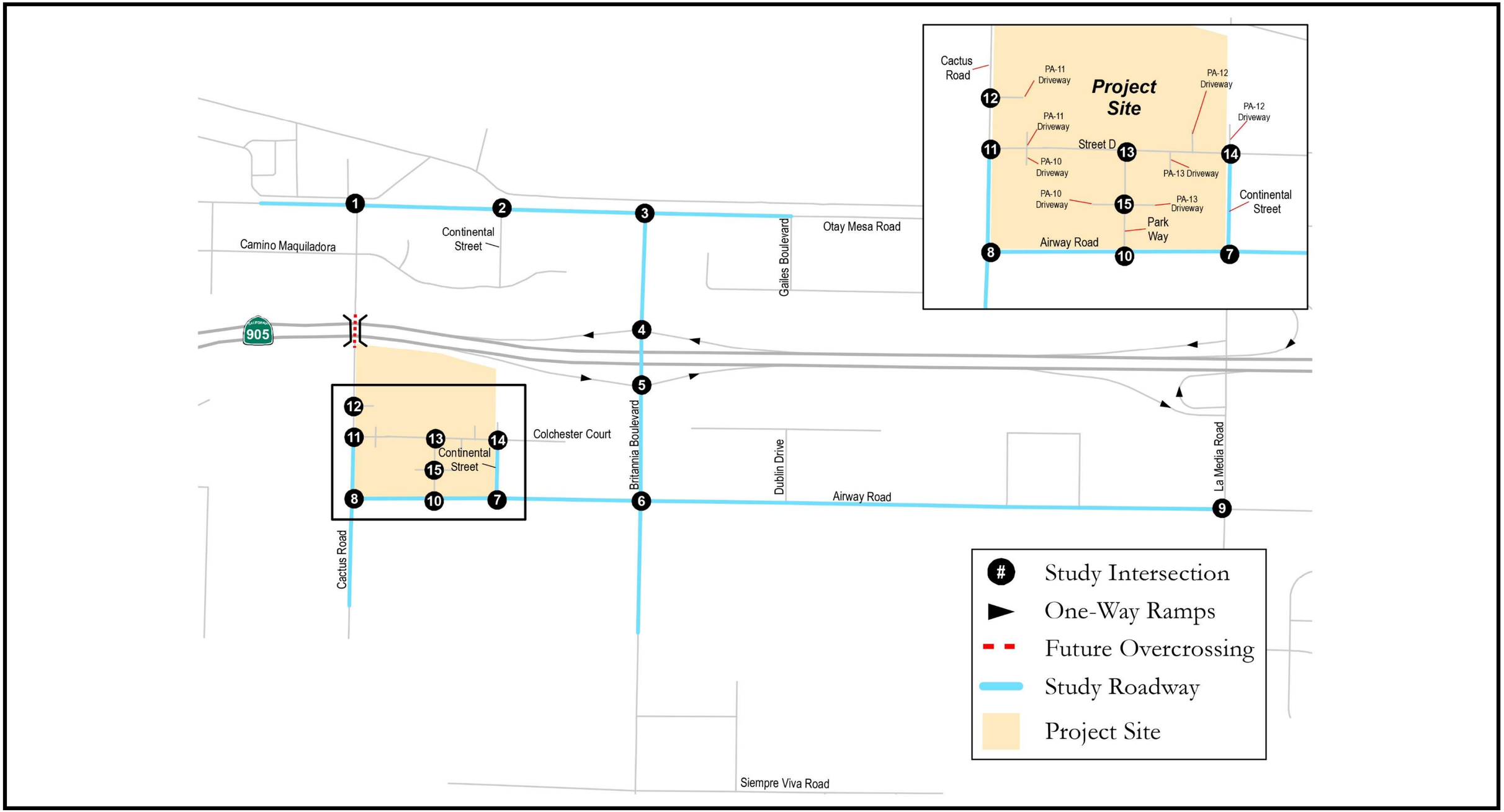
The City of SAN DIEGO

Vicinity Map

The Collection at Cactus/PRJ-1111415

Development Services Department

FIGURE No. 5



The City of SAN DIEGO

Transportation Study Area

The Collection at Cactus/PRJ-1111415

Development Services Department

FIGURE No. 6