



L64A-003A

Project Information

Project Nbr: 416650 **Title:** Cortes Residence NDP
Project Mgr: Mendoza, Pancho (619) 446-5194 Fmendoza@sandiego.gov



Review Information

Cycle Type: 4 Submitted (Multi-Discipline)	Submitted: 07/24/2015	Deemed Complete on 07/24/2015
Reviewing Discipline: LDR-Planning Review	Cycle Distributed: 07/24/2015	
Reviewer: Lizzi, Philip (619) 446-5159 plizzi@sandiego.gov	Assigned: 07/27/2015	
	Started: 08/13/2015	
Hours of Review: 2.00	Review Due: 08/14/2015	
Next Review Method: Conditions	Completed: 08/14/2015	COMPLETED ON TIME
	Closed: 08/28/2015	

- . The review due date was changed to 08/19/2015 from 08/19/2015 per agreement with customer.
- . The reviewer has indicated they want to review this project again. Reason chosen by the reviewer: Conditions.
- . We request a 3rd complete submittal for LDR-Planning Review on this project as: Conditions.
- . The reviewer has requested more documents be submitted.
- . Your project still has 1 outstanding review issues with LDR-Planning Review (1 of which are new issues).
- . Last month LDR-Planning Review performed 91 reviews, 45.1% were on-time, and 45.2% were on projects at less than < 3 complete submittals.

Information

<u>Cleared?</u>	<u>Issue Num</u>	<u>Issue Text</u>
<input checked="" type="checkbox"/>	1	The project site is located in the RS-1-4 zone; Project proposes a single family dwelling on a site containing Environmentally Sensitive Lands. A Neighborhood Development Permit (NDP) is required due to the presence of Environmentally Sensitive Lands (ESL). The project may be processed in accordance with Process Two if it is designed to meet all regulations of the Environmentally Sensitive Lands section. Depending on ESL/deviations this could result in a Process 4 decision. Process 4 is a Planning Commission decision. The decision could be appealed to the next highest level. (From Cycle 2)
<input checked="" type="checkbox"/>	2	Per LDC section 112.0103, this project shall be consolidated at the highest decision level established by the required discretionary permits for this project (should any additional permits be required), with all supplemental findings to be developed by the applicant and to be submitted for staff to review as the project nears a hearing date. (From Cycle 2)
<input checked="" type="checkbox"/>	3	Please note if the project is redesigned to include retaining walls the following would apply. The retaining wall height within the 6 foot Front Yard setback shall not exceed 3 feet, pursuant to LDC, section 142.0340 (c). (From Cycle 2)
<input checked="" type="checkbox"/>	4	Outside of the front yard setback the maximum height for a single retaining wall, measured from grade to grade, shall be 10 feet. When the overall retained height would exceed 10 feet, the retaining wall shall be broken into multiple stepped walls, with no individual wall height exceeding 6 feet. A minimum horizontal distance of 3 feet shall be maintained between each individual wall in the stepped wall system, and shall be landscaped. (From Cycle 2)
<input checked="" type="checkbox"/>	5	Also, consider retaining walls that are incorporated into the design of the structure so that they become part of the structure. The color of retaining walls should blend with the natural terrain and the color of the structures on the site. See Retaining Wall regulations in SDMC Section, 142.0340. (From Cycle 2)

Community Plan

<u>Cleared?</u>	<u>Issue Num</u>	<u>Issue Text</u>
<input checked="" type="checkbox"/>	6	The project site is located on Norman Avenue in the Navajo Community and is designated low density residential and located within an area identified as having steep hillsides. Allowable density is 0-8 dwelling unit per acre. Density conforms to the Community Plan. (From Cycle 2)

ESL

<u>Cleared?</u>	<u>Issue Num</u>	<u>Issue Text</u>
<input checked="" type="checkbox"/>	7	Development Area The allowable development area is limited to previously disturbed areas (areas not containing steep hillsides), except that development is permitted in steep hillsides if necessary to achieve a maximum development area of 25 percent of the premises, LDC, section 143.0142(a) (2). (From Cycle 2)

For questions regarding the 'LDR-Planning Review' review, please call Philip Lizzi at (619) 446-5159. Project Nbr: 416650 / Cycle: 4





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<u>Cleared?</u>	<u>Issue Num</u>	<u>Issue Text</u>
<input checked="" type="checkbox"/>	8	The "Limit of Work/Development Line" has been shown on the Site and Grading Plan. Once this line is established per Exhibit "A", development/grading/encroachment shall not be permitted beyond this line. Development area shall include all graded/disturbed/developed/brush management zone 1 areas. Please shade this area on the plans and provide the area calculation. This line of development shall coincide with the Covenant of Easement boundary, please revise plans accordingly. (From Cycle 2)
<input checked="" type="checkbox"/>	9	Requirement for Covenant of Easement: Per 143.0152 assurance of the continued preservation of the remainder portion of the site will be achieved with the requirement for the property owner to record a covenant of easement against the title to the property that will maintain that portion of the property in its natural state. Provide the area (square footage) of the proposed Covenant of Easement on the Site/Grading plan. The Easement shall be a condition of the SDP and shall be recorded prior to Grading Permit approval. (From Cycle 2)
<input checked="" type="checkbox"/>	10	Clearly demonstrate that development is complying with the standards of the Steep Hillside Guidelines. It shall be demonstrated that proposed development results in the most sensitive design possible (refer to the Steep Hillside Guidelines, pages 16-18). Manufactured grade/contour lines should blend with existing native terrain/slope. newly created manufactured slopes should be landform graded with undulating slopes, irregular/varying gradients, and with the top and bottom of new manufactured slopes rounded to resemble natural landforms. (From Cycle 2)
<input checked="" type="checkbox"/>	11	Pursuant to ESL regulation 143.0142 (c), newly created slopes shall not exceed the slope gradient in section 142.0133. Revise the proposed grading to a maximum of 50 percent gradient (2:1). Slopes steeper than 50 percent gradient (2:1) may be authorized by the City Engineer pursuant to section 142.0133(d). (From Cycle 2)
<input checked="" type="checkbox"/>	12	Per SDMC Section 143.0141(1), all development occurring in sensitive biological resources is subject to a site-specific impact analysis conducted by the City Manager, in accordance with the Biology Guidelines in the Land Development Manual. The impact analysis shall evaluate impacts to sensitive biological resources and CEQA sensitive species. The analysis shall determine the corresponding mitigation, where appropriate, and the requirements for protection and management. Mitigation requirements will be determined by the LDR-Environmental reviewer. (From Cycle 2)
<input checked="" type="checkbox"/>	13	Grading and offsite disturbance of Environmentally Sensitive Lands shall require a site specific analysis of each lot. Impacts to Steep Hillside shall conform to SDMC, Section 143.0142. Provide a steep slope analysis for the adjacent lots. The environmental document shall also include an analysis of impacts to sensitive biological resources, SDMC, Section 143.0141. (From Cycle 2)

Planning Comments

<u>Cleared?</u>	<u>Issue Num</u>	<u>Issue Text</u>
<input checked="" type="checkbox"/>	14	Parking: Provide the required parking space dimensions on the floor plans as specified in SDMC Section 142.0560(b), Table 142-05K. (From Cycle 2)

Conditions

<u>Cleared?</u>	<u>Issue Num</u>	<u>Issue Text</u>
<input type="checkbox"/>	15	The property owner shall record a covenant of easement against the title to the property that will maintain that portion of the property in its natural state. The Easement shall be a condition of the SDP and shall be recorded prior to Grading Permit approval. (New Issue)





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Review Information

Cycle Type: 4 Submitted (Multi-Discipline) **Submitted:** 07/24/2015 Deemed Complete on 07/24/2015
Reviewing Discipline: LDR-Environmental **Cycle Distributed:** 07/24/2015
Reviewer: Szymanski, Jeffrey **Assigned:** 07/29/2015
(619) 446-5324 **Started:** 08/27/2015
jszymanski@sandiego.gov **Review Due:** 08/19/2015
Hours of Review: 2.00 **Completed:** 08/27/2015 **COMPLETED LATE**
Next Review Method: Submitted (Multi-Discipline) **Closed:** 08/28/2015

- . The reviewer has indicated they want to review this project again. Reason chosen by the reviewer: Partial Response to Cmnts/Regs.
- . We request a 3rd complete submittal for LDR-Environmental on this project as: Submitted (Multi-Discipline).
- . The reviewer has requested more documents be submitted.
- . Your project still has 3 outstanding review issues with LDR-Environmental (3 of which are new issues).
- . Last month LDR-Environmental performed 97 reviews, 46.4% were on-time, and 40.9% were on projects at less than < 3 complete submittals.

Extended Initial Study 5/15/15

<u>Cleared?</u>	<u>Issue Num</u>	<u>Issue Text</u>
<input checked="" type="checkbox"/>	1	The Environmental Analysis Section (EAS) has reviewed the referenced project and has determined that additional information is required for Biological Resources. Until the above issue has been addressed, the CEQA determination cannot be made and the environmental processing time line will be held in abeyance. (From Cycle 2)

Biological Resources

<u>Cleared?</u>	<u>Issue Num</u>	<u>Issue Text</u>
<input checked="" type="checkbox"/>	2	The project is located within native habitat and has the potential to impact sensitive biological resources. Therefore, the preparation of biological technical report (BTR), prepared in accordance with the City's Biological Guidelines, would be required. The biological report should include the following: Location Map (800 Engineering scale) w/survey boundaries (Elevations/topography, north direction, and scale), Vegetation Map overlain by the development proposal Vegetation map (with ESL delineated) showing habitat, area of impact with habitat and plant species. (From Cycle 2)
<input checked="" type="checkbox"/>	3	Please demonstrate if there are additional seasonal/preconstruction surveys required for spring/breeding/wet conditions? The BTR should identify all potential direct and indirect impacts to biological resources (include all on- and off-site utility connections, staging areas, brush management zones, and access/staging areas. (From Cycle 2)
<input checked="" type="checkbox"/>	4	The report should also quantify all impact areas by Tier and should state recommendations to mitigate any potential significant impacts to biological resources. Please identify if the project could impact sensitive avian species. Are any permits or legal compliance required (City, State, and/or Federal)? (From Cycle 2)

EAS Review

<u>Cleared?</u>	<u>Issue Num</u>	<u>Issue Text</u>
<input type="checkbox"/>	6	EAS has reviewed the biological technical report (BTR) (Laguna Mountain, July 2015) and is providing the following comments: EAS concurs with the majority of the report; however, clarification must be made in regards to the impact and mitigation requirement. The report has identified a significant impact due to construction noise impacting raptors. However, as stated in the report the project site is devoid of sensitive habitat and is an urbanized area. The report states that there is one tree (that will not be removed) that was used for perching but no nesting. (New Issue)
<input type="checkbox"/>	7	In order to require mitigation for an impact there needs to be a nexus between the two. Please reconsider if the temporary noise associated with the project would rise to a level that would require mitigation to sensitive biological resources as described in the City's biological guidelines. Also, please consider if the MBTA would offer protection for the potential impacts. Please note that compliance with the MBTA is not considered mitigation. (New Issue)
<input type="checkbox"/>	8	Until the above issue has been addressed, the CEQA determination cannot be made and the environmental processing time line will be held in abeyance (New Issue)





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Review Information

Cycle Type: 4 Submitted (Multi-Discipline) **Submitted:** 07/24/2015 Deemed Complete on 07/24/2015
Reviewing Discipline: LDR-Engineering Review **Cycle Distributed:** 07/24/2015
Reviewer: Florezabihi, Hoss **Assigned:** 07/26/2015
(619) 446-5348 **Started:** 08/12/2015
florezabih@sandiego.gov **Review Due:** 08/14/2015
Hours of Review: 3.00 **Completed:** 08/13/2015 **COMPLETED ON TIME**
Next Review Method: Submitted (Multi-Discipline) **Closed:** 08/28/2015

- . The review due date was changed to 08/19/2015 from 08/19/2015 per agreement with customer.
- . The reviewer has indicated they want to review this project again. Reason chosen by the reviewer: Partial Response to Cmnts/Regs.
- . We request a 3rd complete submittal for LDR-Engineering Review on this project as: Submitted (Multi-Discipline).
- . The reviewer has requested more documents be submitted.
- . Your project still has 7 outstanding review issues with LDR-Engineering Review (7 of which are new issues).
- . Last month LDR-Engineering Review performed 77 reviews, 88.3% were on-time, and 44.1% were on projects at less than < 3 complete submittals.

1st Review Comments

<u>Cleared?</u>	<u>Issue Num</u>	<u>Issue Text</u>
<input checked="" type="checkbox"/>	1	Please revise location of front property line on your Site Plan & Grading Plan to show/call out 10' curb to PL consistent with provided topo. (From Cycle 2)
<input checked="" type="checkbox"/>	2	Please note all proposed non standard private improvements within public right of way will require Encroachment Maintenance & removal Agreement that must be processed during Ministerial review. (From Cycle 2)
<input checked="" type="checkbox"/>	3	Please note proposed drainage pattern for this project must mimic Existing condition (several drainage points in oppose to two concentrated point of discharge). (From Cycle 2)
<input checked="" type="checkbox"/>	4	Please add a note on your Site Plan stating property owner bears the risk of private property accepting public water by providing " Hold City Harmless" form. (From Cycle 2)
<input checked="" type="checkbox"/>	5	Please note no permanent structure will be allowed within sewer easement . This includes building caisson , deck , etc.. Please revise accordingly. (From Cycle 2)
<input checked="" type="checkbox"/>	6	Please note per DS-560 , this is a "Standard Project" and is subject to LID (site design and Source Control) requirements. (From Cycle 2)
<input checked="" type="checkbox"/>	7	Please note per DS-560 , Water Pollution Control Plan (WPCP) is required . Please refer to appendix G of storm Water Standard Manual for requirements . (From Cycle 2)
<input checked="" type="checkbox"/>	8	Prior to the issuance of any construction permit, the Owner/Permittee shall incorporate any construction Best Management Practices necessary to comply with Chapter 14, Article 2, Division 1 (Grading Regulations) of the Municipal Code, into the construction plans or specifications.

(From Cycle 2)

2nd Review Comments

<u>Cleared?</u>	<u>Issue Num</u>	<u>Issue Text</u>
<input type="checkbox"/>	9	On Sheet A0.2 -- Please remove the ref. lot 347 Map No. 5011 and add Parcel Map No. 2069 to parcel 1 & 2 . (New Issue)
<input type="checkbox"/>	10	Please revise all applicable plans to show the max. 25' driveway. (New Issue)

Conditions :

<u>Cleared?</u>	<u>Issue Num</u>	<u>Issue Text</u>
<input type="checkbox"/>	13	Prior to issuance of Building permit , , the owner / permittee shall enter into an agreement to indemnify , protect and hold harmless the City , its officials and employees from any and all claims, demands , causes or action , liability or loss because of , or arising out of surface drainage into the property from the Right of Way due to the design of the existing driveway. (New Issue)
<input type="checkbox"/>	14	Prior to the issuance of any Building permit , owner /permittee shall obtain Encroachment Maintenance & removal agreement (EMRA) for non standard driveway and private walk on Norman Lane right of way to satisfaction of City Engineer. (New Issue)
<input type="checkbox"/>	16	Prior to issuance of any construction permit , the Owner/Permittee shall submit a building pad certification signed by a Registered Civil Engineer or a Licensed Land Surveyor, certifying that the pad elevation based on USGS datum is consistent with Exhibit 'A', satisfactory to the City Engineer. (New Issue)
<input type="checkbox"/>	18	Prior to the issuance of any construction permit, the Owner/Permittee shall incorporate any construction Best Management Practices necessary to comply with Chapter 14, Article 2, Division 1 (Grading Regulations) of the SDMC, into the construction plans or specifications. (New Issue)

For questions regarding the 'LDR-Engineering Review' review, please call Hoss Florezabihi at (619) 446-5348. Project Nbr: 416650 / Cycle: 4





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<u>Cleared?</u>	<u>Issue Num</u>	<u>Issue Text</u>
<input type="checkbox"/>	19	Prior to issuance of any construction Permit , The owner/permittee shall submit a Water Pollution Control Plan (WPCP) . The WPCP shall be prepared in accordance with the guidelines in Appendix G of the City's Storm Water Standards. (New Issue)





Cycle Issues

8/28/15 4:00 pm

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THE CITY OF SAN DIEGO
Development Services
1222 First Avenue, San Diego, CA 92101-4154

L64A-003A

Review Information

Cycle Type: 4 Submitted (Multi-Discipline)	Submitted: 07/24/2015	Deemed Complete on 07/24/2015
Reviewing Discipline: Community Planning Group	Cycle Distributed: 07/24/2015	
Reviewer: Mendoza, Pancho (619) 446-5194 Fmendoza@sandiego.gov	Assigned: 07/27/2015	
	Started: 08/10/2015	
Hours of Review: 0.30	Review Due: 08/14/2015	
Next Review Method: Submitted (Multi-Discipline)	Completed: 08/20/2015	COMPLETED LATE
	Closed: 08/28/2015	

- . The review due date was changed to 08/19/2015 from 08/19/2015 per agreement with customer.
- . The reviewer has indicated they want to review this project again. Reason chosen by the reviewer: First Review Issues.
- . We request a 3rd complete submittal for Community Planning Group on this project as: Submitted (Multi-Discipline).
- . The reviewer has requested more documents be submitted.
- . Your project still has 1 outstanding review issues with Community Planning Group (None of which are new)
- . Last month Community Planning Group performed 59 reviews, 39.0% were on-time, and 48.3% were on projects at less than < 3 complete submittals.

Contact Group

<u>Cleared?</u>	<u>Issue Num</u>	<u>Issue Text</u>
<input type="checkbox"/>	1	If you have not already done so, please contact Matthew Adams, Chairperson of the Navajo Community Planners, Inc., at navajoplanners@cox.net to schedule your project for a recommendation from the group. If you have already obtained a recommendation from the community planning group, in your resubmittal please indicate how your project incorporates any input suggested to you by the community planning group. (From Cycle 2)





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Review Information

Cycle Type: 4 Submitted (Multi-Discipline) **Submitted:** 07/24/2015 Deemed Complete on 07/24/2015
Reviewing Discipline: LDR-Landscaping **Cycle Distributed:** 07/24/2015
Reviewer: Kohakura, Vanessa **Assigned:** 07/29/2015
(619) 446-5120 **Started:** 08/17/2015
Vkohakura@sandiego.gov **Review Due:** 08/14/2015
Hours of Review: 2.00 **Completed:** 08/17/2015 **COMPLETED LATE**
Next Review Method: Submitted (Multi-Discipline) **Closed:** 08/28/2015

- . The review due date was changed to 08/19/2015 from 08/19/2015 per agreement with customer.
- . The reviewer has indicated they want to review this project again. Reason chosen by the reviewer: Partial Response to Cmnts/Regs.
- . We request a 3rd complete submittal for LDR-Landscaping on this project as: Submitted (Multi-Discipline).
- . The reviewer has requested more documents be submitted.
- . Your project still has 7 outstanding review issues with LDR-Landscaping (7 of which are new issues).
- . Last month LDR-Landscaping performed 50 reviews, 74.0% were on-time, and 44.2% were on projects at less than < 3 complete submittals.

First Review - 5/19/15

<u>Cleared?</u>	<u>Issue Num</u>	<u>Issue Text</u>
<input checked="" type="checkbox"/>	1	Per the Public Facility Regulations, San Diego Municipal Code 142.0610 and 142.0611(c), this project is subject to street tree requirements. Propose street trees from the Street Tree Selection Guide found at the following link: http://www.sandiego.gov/street-div/pdf/treeguide.pdf Locate trees away from all underground utilities per SDMC 142.0409. Show the location, species, and size (min. 24" box) on the plans. (From Cycle 2)
<input checked="" type="checkbox"/>	2	Street trees cont: Propose street trees at a rate of one canopy tree per 30 linear feet of street frontage or one palm tree per 20 lf of street frontage. Show any existing or proposed utility locations so staff can verify the minimum separation distances to trees. *Washingtonia robusta (Mexican fan palm) has been found to be invasive, and therefore, not allowed to be planted. If existing palm is a Mexican fan palm, please replace with another noninvasive species. (From Cycle 2)
<input checked="" type="checkbox"/>	3	Provide the following note on the Landscape Plan: MINIMUM TREE SEPARATION DISTANCE Traffic signals / stop signs - 20 feet Underground utility lines - 5 feet (10' for sewer) Above ground utility structures - 10 feet Driveway (entries) - 10 feet Intersections (intersecting curb lines of two streets) - 25 feet (From Cycle 2)

2nd Review - 8/19/15

<u>Cleared?</u>	<u>Issue Num</u>	<u>Issue Text</u>
<input type="checkbox"/>	4	There is a symbol on both the Site Plan (Sheet A0.3) and the Landscape Concept Plan Sheet A.05) on the north west side of the proposed building structure - this symbol is not included in the legend. If it is a tree, please remove- the tree will need to be removed pursuant to SDMC Section 142.0405 and 142.0409 (the minimum separation distances to a sewer and to a building are not being provided). (New Issue)

Draft Conditions

<u>Cleared?</u>	<u>Issue Num</u>	<u>Issue Text</u>
<input type="checkbox"/>	5	In the event that the Landscape Plan and the Site Plan conflict, the Site Plan shall be revised to be consistent with the Landscape Plan such that landscape areas are consistent with the Exhibit 'A' Landscape Development Plan. (New Issue)





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<u>Cleared?</u>	<u>Issue Num</u>	<u>Issue Text</u>
<input type="checkbox"/>	6	Prior to issuance of any engineering permits for grading, the Owner/Permittee shall submit complete construction documents for the revegetation and hydroseeding of all disturbed land in accordance with the Landscape Standards and to the satisfaction of the Development Services Department. All plans shall be in substantial conformance to this permit (including Environmental conditions) and Exhibit 'A,' on file in the Office of the Development Services Department. (New Issue)
<input type="checkbox"/>	7	Prior to issuance of any construction permits for structures, the Owner/Permittee shall submit complete landscape and irrigation construction documents consistent with the Landscape Standards to the Development Services Department for approval. The construction documents shall be in substantial conformance with Exhibit 'A,' Landscape Development Plan, on file in the Development Services Department. Construction plans shall show, label, and dimension a 40 sq-ft area around each tree which is unencumbered by hardscape and utilities as set forth under LDC 142.0403(b)(5). (New Issue)
<input type="checkbox"/>	8	The Owner/Permittee shall be responsible for the maintenance of all landscape improvements shown on the approved plans, including in the right-of-way, consistent with the Landscape Standards unless long-term maintenance of said landscaping will be the responsibility of a Landscape Maintenance District or other approved entity. All required landscape shall be maintained in a disease, weed and litter free condition at all times. Severe pruning or "topping" of trees is not permitted unless specifically noted in this Permit. (New Issue)
<input type="checkbox"/>	9	If any required landscape (including existing or new plantings, hardscape, landscape features, etc.) indicated on the approved construction document plans is damaged or removed during demolition or construction, the Owner/Permittee shall repair and/or replace it in kind and equivalent size per the approved documents to the satisfaction of the Development Services Department within 30 days of damage. (New Issue)
<input type="checkbox"/>	10	Installation of slope planting and erosion control including seeding of all disturbed land (slopes and pads) consistent with the approved landscape and grading plans is considered to be in the public interest. The Owner/Permittee shall initiate such measures as soon as the grading and disturbance has been completed. Such erosion control/slope planting and the associated irrigation systems (temporary and/or permanent) and appurtenances shall be installed in accordance with the approved plans and the Land Development Manual: Landscape Standards. (New Issue)





Cycle Issues

THE CITY OF SAN DIEGO
Development Services
1222 First Avenue, San Diego, CA 92101-4154

L64A-003A

Review Information

Cycle Type: 4 Submitted (Multi-Discipline)	Submitted: 07/24/2015	Deemed Complete on 07/24/2015
Reviewing Discipline: REA-Airports	Cycle Distributed: 07/24/2015	
Reviewer: Mendoza, Pancho (619) 446-5194 Fmendoza@sandiego.gov	Assigned: 07/29/2015	
	Started: 07/29/2015	
Hours of Review: 0.30	Review Due: 08/14/2015	
Next Review Method: Conditions	Completed: 08/18/2015	COMPLETED LATE
	Closed: 08/28/2015	

- . The review due date was changed to 08/19/2015 from 08/19/2015 per agreement with customer.
- . We request a 3rd complete submittal for REA-Airports on this project as: Conditions.
- . The reviewer has requested more documents be submitted.
- . Last month REA-Airports performed 4 reviews, .0% were on-time, and 100.0% were on projects at less than < 3 complete submittals.

First review

<u>Cleared?</u>	<u>Issue Num</u>	<u>Issue Text</u>
<input checked="" type="checkbox"/>	1	Although the location is not in the overflight notification area, it will be subject to aircraft overflights and noise. It is less than 5 miles from Montgomery Field and very close to the extended centerline for the main runway. (From Cycle 2)

