County of San Diego

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April 24, 2024

CEQA Initial Study - Environmental Checklist Form
(Based on the State CEQA Guidelines, Appendix G)

1. Title; Project Number(s); Environmental Log Number:

   Woodside Self Storage Major Use Permit;
   PDS2022-MUP-22-006; PDS2022-TPM-21302; PDS2022-ER-21-14-003

2. Lead agency name and address:
   County of San Diego, Planning & Development Services
   5510 Overland Avenue, Suite 110
   San Diego, CA 92123-1239

3. a. Contact: Daniella Hofreiter Project Manager
   b. Phone number: 619-629-4431
   c. E-mail: DaniellaT.Hofreiter@sdcounty.ca.gov

4. Project location:

   The approximately 0.79-acre project site is located at 12431 Woodside Avenue in the unincorporated community of Lakeside in San Diego County (APN 394-122-1600). The project site is located west of Cactus Street, between Woodside Avenue (to the north) and Julian Avenue (to the south). Figure 1 shows the regional location and Figure 2 shows the project location on an aerial photograph.

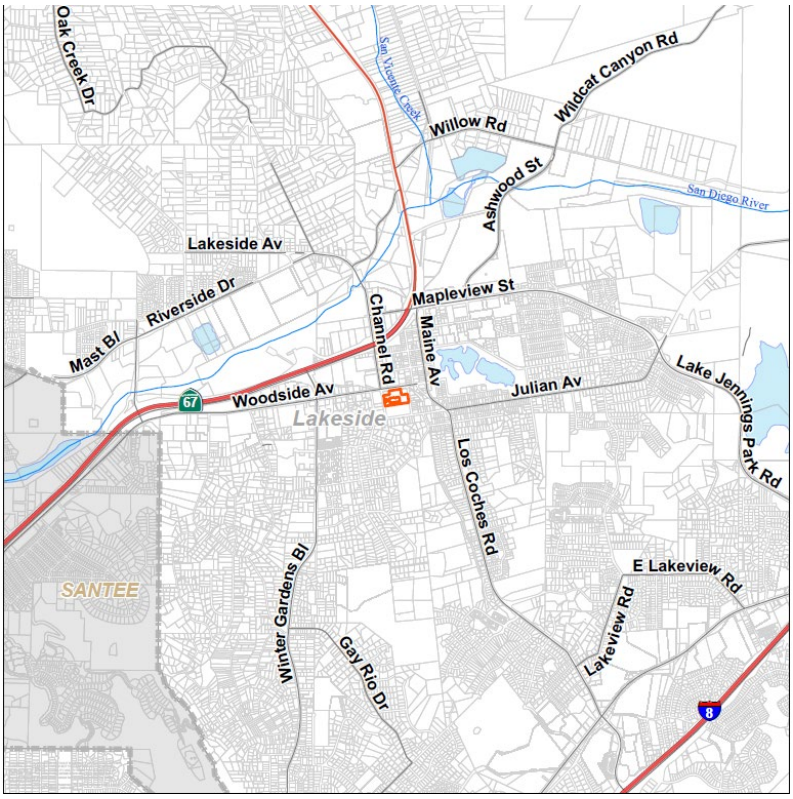


Figure 1, Vicinity Map

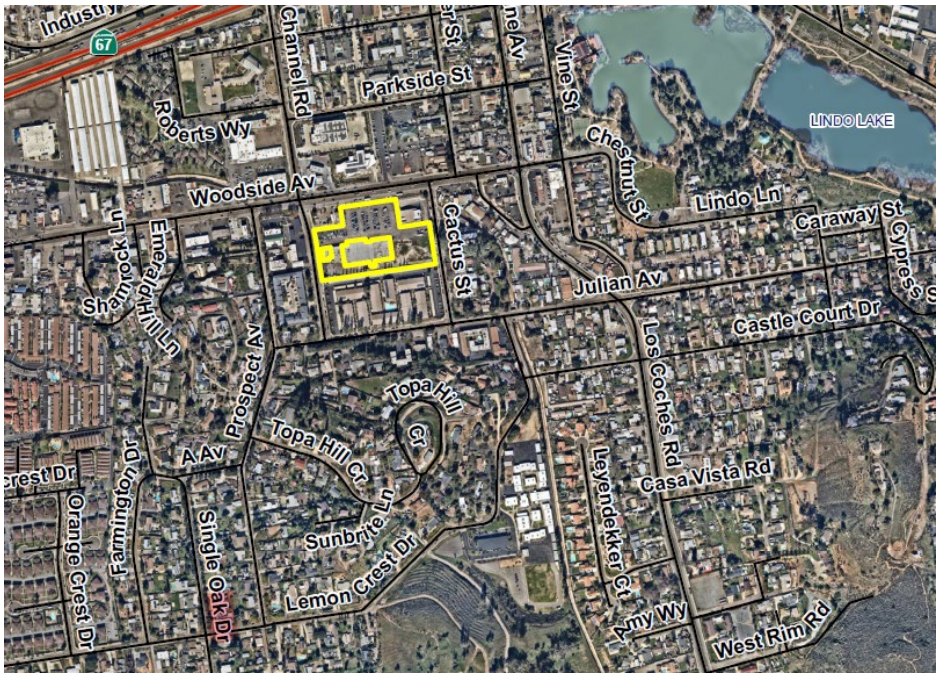


Figure 2, Aerial of the Vicinity

5. Project Applicant name and address:

Robert Garmo
21st Century Lakeside Holdings LLC

5464 Grossmont Center Drive Suite 300
La Mesa, CA 91942

6. General Plan

Community Plan:	Lakeside
Land Use Designation:	General Commercial (C-1) and Village Residential VR
Density:	2 du/acre
Floor Area Ratio (FAR):	N/A

7. Zoning

Use Regulation:	Commercial Office (C36) and Urban Residential (RU)
Minimum Lot Size:	0.5 acre(s)
Special Area Regulation:	N/A

8. Description of project:

The project is a Major Use Permit (MUP) to authorize the construction and operation of a self-storage facility on a 0.79-acre site. Access to the site would be from Cactus Street via an existing driveway. The project site is subject to the General Plan Village Category, Village Residential (VR-24) Land Use Designation. The zoning for the site is Urban Residential (RU). Self-storage facilities are authorized in the RU Use Regulation upon approval of a MUP pursuant to the County of San Diego (County) Zoning Ordinance Section 2185.c.

The project would develop a self-storage facility consisting of a three-story building totaling 102,236 square feet (sf) of floor space with one below-grade level (Figure 3, Site Plan). An approximately 1,180-sf office area would be provided on the ground floor. The project would include the installation of a 160 kilowatt (kW) solar array on the roof of the main storage building in accordance with California Title 24 Building Energy Efficiency Standards. In addition, the project would include a lined biofiltration basin on the eastern side of the project site to collect stormwater runoff from the project site that would drain to a curb outlet on Cactus Street.

The project would provide 14 parking spaces on the north side of the building, and a recessed loading bay would be located on the south side of the building. A minimum of 8 of the project's 14 parking spaces would be electric vehicle (EV) capable spaces, and a minimum of 3 of those EV capable spaces would include electric vehicle supply equipment (EVSE). The self-storage and office areas would be climate controlled (e.g., heating and air conditioning) but would not include refrigerated storage space. Approximately 6,715 sf of landscape area would be provided, and the remainder of the project site would be asphalt or concrete impervious surfaces. The proposed project would include sidewalk improvements along the project frontage on Cactus Street.

Approximately 317 cubic yards (cy) of vegetation and debris would be hauled from the project site during construction. The project would also require approximately 8,131 cy of cut and 486 cy of fill and would export approximately 8,471 cy of soil.

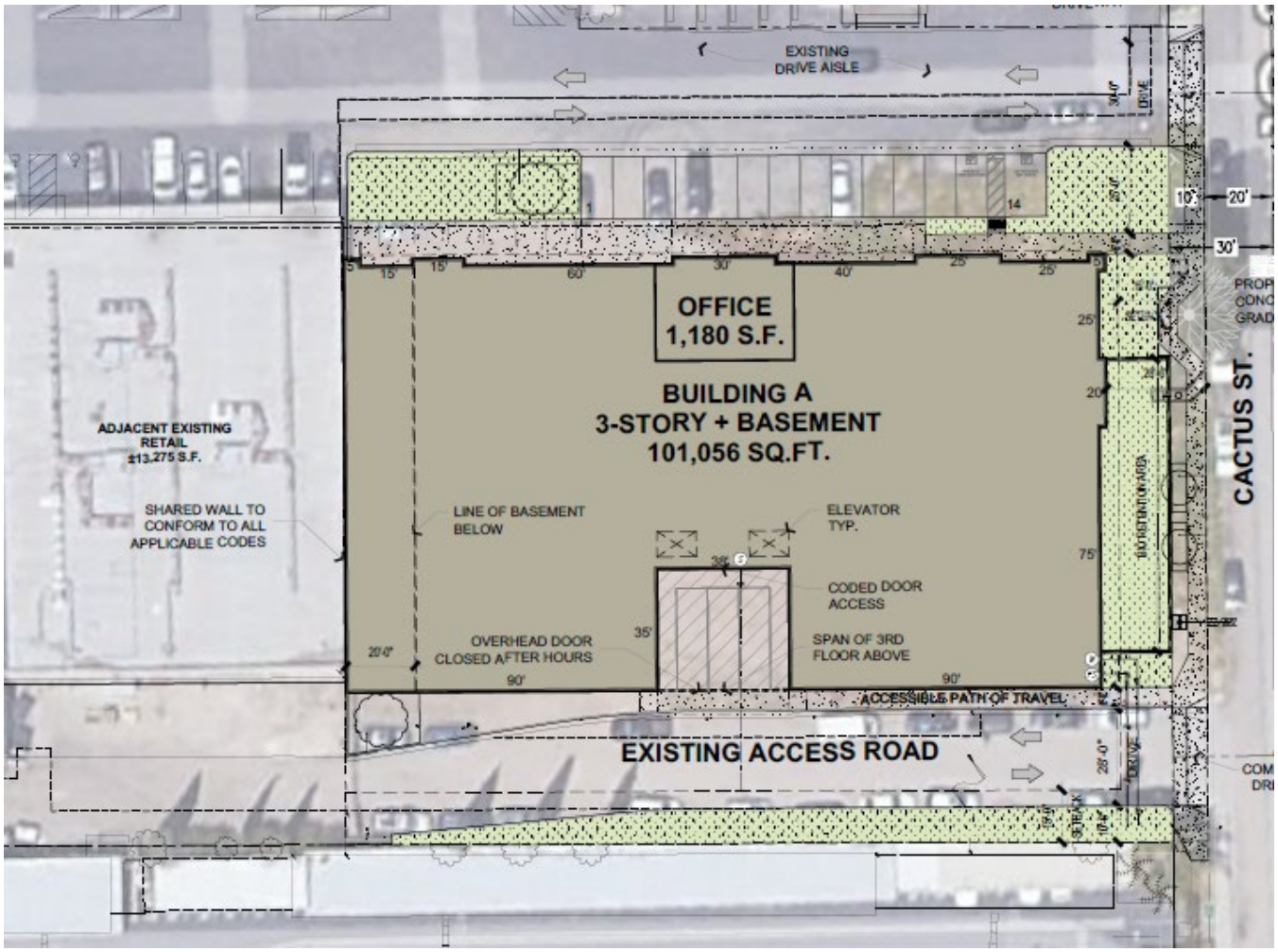


Figure 3, Site Plan

9. Surrounding land uses and setting (Briefly describe the project's surroundings):

The project site is an undeveloped area in the southeast corner of an existing retail center, or strip mall, located south of Woodside Avenue between Channel Road and Cactus Street. The project building would abut an existing auto parts store to the west. A commercial/retail building is located north of the project site, across a strip mall driveway. A multi-family housing complex is located adjacent to and south of the project site, with the closest building approximately 70 feet from the project site. Single-family homes are located approximately 60 feet east of the project site, across Cactus Street. Commercial buildings are located across Cactus Street, east and northeast of the project site.

10. Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement):

Permit Type/Action	**Agency**
Landscape Plans	County of San Diego

Major Use Permit	County of San Diego
Tentative Parcel Map	County of San Diego
County Right-of-Way Permits Construction Permit Excavation Permit Encroachment Permit	County of San Diego
Grading Permit	County of San Diego
Improvement Plans	County of San Diego
National Pollutant Discharge Elimination System (NPDES) Permit	RWQCB
General Construction Storm water Permit	RWQCB
Water District Approval	Lakeside Water District
Sewer District Approval	San Diego County Sanitation District
Fire District Approval	Lakeside Fire Protection District

11. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code §21080.3.1? If so, has consultation begun?

YES ☒ NO ☐

Tribal Consultation was conducted and all consulting tribes concluded consultation prior to public review of the Mitigated Negative Declaration.

Note: Conducting consultation early in the CEQA process allows tribal governments, public lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and to reduce the potential for delay and conflict in the environmental review process (see Public Resources Code §21083.3.2). Information is also available from the Native American Heritage Commission's Sacred Lands File per Public Resources Code §5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code §21082.3(e) contains provisions specific to confidentiality.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED: The environmental factors checked below would be potentially affected by this project and involve at least one impact that is a "Potentially Significant Impact" or a "Less Than Significant With Mitigation Incorporated," as indicated by the checklist on the following pages.

☐ Aesthetics	☐ Agriculture and Forest Resources	☐ Air Quality
☐ Biological Resources	☒ Cultural Resources	☐ Geology & Soils

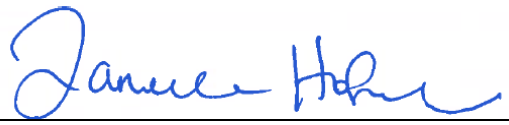
☐ Greenhouse Gas Emissions	☐ Hazards & Haz. Materials	☐ Hydrology & Water Quality
☐ Land Use & Planning	☐ Mineral Resources	☐ Noise
☐ Population & Housing	☐ Public Services	☐ Recreation
☐ Transportation/Traffic	☒ Tribal Cultural Resources	☐ Mandatory Findings of Significance
☐ Utilities & Service Systems		

DETERMINATION: (To be completed by the Lead Agency)
On the basis of this initial evaluation:

☐ On the basis of this Initial Study, Planning & Development Services finds that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☒ On the basis of this Initial Study, Planning & Development Services finds that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ On the basis of this Initial Study, Planning & Development Services finds that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.



Signature — May 17, 2024 (Date)

Daniella Hofreiter (Printed Name) — Planning Manager (Title)

INSTRUCTIONS ON EVALUATION OF ENVIRONMENTAL IMPACTS

1. A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).

2. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.

3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, Less Than Significant With Mitigation Incorporated, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

4. "Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level.

5. Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
   a) Earlier Analysis Used. Identify and state where they are available for review.
   b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
   c) Mitigation Measures. For effects that are "Less Than Significant With Mitigation Incorporated," describe the mitigation measures that were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

7. The explanation of each issue should identify:
   a) The significance criteria or threshold, if any, used to evaluate each question; and
   b) The mitigation measure identified, if any, to reduce the impact to less than significance

I. AESTHETICS

Would the project:

a) Have a substantial adverse effect on a scenic vista?

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☐ Less than Significant Impact
☒ No Impact

Discussion/Explanation: A vista is a view from a particular location or composite views along a roadway or trail. Scenic vistas often refer to views of natural lands, but may also be compositions of natural and developed areas, or even entirely of developed and unnatural areas, such as a scenic vista of a rural town and surrounding agricultural lands. What is scenic to one person may not be scenic to another, so the assessment of what constitutes a scenic vista must consider the perceptions of a variety of viewer groups.

The items that can be seen within a vista are visual resources. Adverse impacts to individual visual resources or the addition of structures or developed areas may or may not adversely affect the vista. Determining the level of impact to a scenic vista requires analyzing the changes to the vista as a whole and also to individual visual resources.

No Impact: As described in the General Plan Update (GPU) Environmental Impact Report (EIR; County of San Diego 2011), the County contains visual resources affording opportunities for scenic vistas in every community. Resource Conservation Areas (RCAs) are identified within the GPU EIR and are the closest that the County comes to specifically designating scenic vistas. Many public roads in the County currently have views of RCAs or expanses of natural resources that would have the potential to be considered scenic vistas. Numerous public trails are also available throughout the County. New development can often have the potential to obstruct, interrupt, or detract from a scenic vista.

The project site is located in the Lakeside Community Planning Area. According to the Lakeside Community Plan, the nearest RCA to the project site is the El Capitan Reservoir – El Cajon RCA, which is located approximately 1.47 miles east of the project site at its nearest point, around Lake Jennings. Due to intervening structures and topography, no impacts would occur to the El Capitan Reservoir – El Cajon RCA.

The project site is an undeveloped lot in the southeast corner of an existing retail center, or strip mall, located south of Woodside Avenue, between Channel Road and Cactus Street. The project building would abut an existing auto parts store to the west. A commercial/retail building is located north of the project site, across a strip mall driveway. A multi-family housing complex is located adjacent to and south of the project site, with the closest building approximately 70 feet from the project site. Single-family homes are located approximately 60 feet east of the project site, across Cactus Street. Commercial buildings are located across Cactus Street, east and northeast of the project site. The proposed project is not located near or within, or visible from, a scenic vista and would not substantially change the composition of an existing scenic vista in a way that would adversely alter the visual quality or character of the view. Given the urban

environment surrounding the project site, the proposed project would not substantially degrade a scenic vista. Therefore, the proposed project would not have an adverse effect on a scenic vista.

b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less than Significant Impact
☐ No Impact

Discussion/Explanation: State scenic highways refer to those highways that are officially designated by the California Department of Transportation (Caltrans) as scenic (Caltrans - California Scenic Highway Program). Generally, the area defined within a state scenic highway is the land adjacent to and visible from the vehicular right-of-way. The dimension of a scenic highway is usually identified using a motorist's line of vision, but a reasonable boundary is selected when the view extends to the distant horizon. The scenic highway corridor extends to the visual limits of the landscape abutting the scenic highway.

Less than Significant Impact: The nearest State scenic highway to the project site is State Route 125, which is designated as scenic from State Route 94 to State Route 8, near La Mesa. This portion of State Route 125 is located approximately 7.4 miles southwest of the project site. Due to the distance and intervening topography, the Project site would not be visible from this State scenic highway. The project would not damage or remove visual resources within a State scenic highway. In addition to State Route 125, State Route 67 from Santee to State Route 78 and Willow and El Monte Roads in the vicinity of the project site are identified by the County in the Conservation Element of the General Plan as County Scenic Corridors. State Route 67 is located approximately 0.25 mile north of the project site. However, the project site is an undeveloped lot in the southeast corner of an existing retail center and would be immediately surrounded by commercial uses and a multi-family housing complex. The project would be an infill development in an urban environment and would not damage any scenic resources on-site. Therefore, the proposed project would not have any substantial adverse effect on a scenic resource within a State scenic highway. Impacts would be less than significant.

c) Substantially degrade the existing visual character or quality of the site and its surroundings?

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less than Significant Impact
☐ No Impact

Discussion/Explanation: Visual character is the objective composition of the visible landscape within a viewshed. Visual character is based on the organization of the pattern elements line, form, color, and texture. Visual character is commonly discussed in terms of dominance, scale, diversity and continuity. Visual quality is the viewer's perception of the visual environment and varies based on exposure, sensitivity, and expectation of the viewers.

Less Than Significant Impact: The project site is an undeveloped parcel in the southeast corner of an existing retail center, or strip mall, located south of Woodside Avenue, between Channel Road and Cactus Street. The existing visual character and quality of the project site and surroundings can be characterized as varying degrees of development, including residential, and commercial uses.

The proposed project is a self-storage facility. The project is compatible with the existing visual environment's visual character and quality as it has been designed in conformance with the Lakeside Community Plan and Design Guidelines, incorporating muted colors with painted stucco and reclaimed lumber veneer. The appearance of the project elements is not anticipated to significantly detract from or contrast with the existing visual character and/or quality of the surrounding neighborhood, community, or localized area. The location, size, and design of the proposed use would be compatible with adjacent uses, residents, and structures with consideration given to harmony in scale, bulk, and coverage, as well as County and community design requirements. Therefore, impacts would be less than significant.

The project would not result in cumulative impacts on a scenic vista because the proposed project viewshed and past, present and future projects within that viewshed were evaluated to determine their cumulative effects. Refer to XVIII. Mandatory Findings of Significance for a comprehensive list of the projects considered. Those projects listed in Section XVII are located within the scenic vista's viewshed and would not contribute to a cumulative impact because the project would be visually integrated into the surroundings in an unobtrusive manner. Therefore, the project would not result in any adverse project or cumulative level effect on visual character or quality on-site or in the surrounding area.

d) Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?

☐ Potentially Significant Impact	☒ Less than Significant Impact
☐ Less Than Significant With Mitigation Incorporated	☐ No Impact

Discussion/Explanation:

Less Than Significant Impact: The proposed project would use outdoor lighting and is located within Zone B as identified by the San Diego County Light Pollution Code. However, it would not adversely affect nighttime views or astronomical observations, because the project would conform to the Light Pollution Code (Section 51.201-51.209), including the Zone B lamp type and shielding requirements per fixture and hours of operation limitations for outdoor lighting and searchlights.

In addition, the proposed project would control outdoor lighting and sources of glare in the following ways:

1. The project would not install outdoor lighting that directly illuminates neighboring properties.

2. The project would not install outdoor lighting that would cast a direct beam angle towards a potential observer, such as a motorists, cyclist or pedestrian.
3. The project would not install outdoor lighting for vertical surfaces such as buildings, landscaping, or signs in a manner that would result in useful light or spill light being cast beyond the boundaries of intended area to be lit.
4. The project would not install any highly reflective surfaces such as glare-producing glass or high-gloss surface color that would be visible along roadways, pedestrian walkways, or in the line of sight of adjacent properties.

The project would not contribute to significant cumulative impacts on day or nighttime views because the project would conform to the Light Pollution Code. The Code was developed by the San Diego County Planning & Development Services and Department of Public Works in cooperation with lighting engineers, astronomers, land use planners from San Diego Gas and Electric, Palomar and Mount Laguna observatories, and local community planning and sponsor groups to effectively address and minimize the impact of new sources light pollution on nighttime views. The standards in the Code are the result of this collaborative effort and establish an acceptable level for new lighting. Compliance with the Code is required prior to issuance of any building permit for any project. Mandatory compliance for all new building permits ensures that this project in combination with all past, present and future projects would not contribute to a cumulatively considerable impact. Therefore, compliance with the Code ensures that the project would not create a significant new source of substantial light or glare, which would adversely affect daytime or nighttime views in the area, on a project or cumulative level.

In addition, the project's outdoor lighting is controlled through the Major Use Permit, which further limits outdoor lighting through strict controls. Therefore, compliance with the Code, in combination with the outdoor lighting and glare controls listed above ensures that the project would not create a significant new source of substantial light or glare.

II. AGRICULTURE AND FORESTRY RESOURCES

Would the project:

a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide or Local Importance (Important Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, or other agricultural resources, to non-agricultural use?

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☐ Less than Significant Impact
☒ No Impact

Discussion/Explanation:

No Impact: The project site is not designated by the Farmland Mapping and Monitoring Program (FMMP) as Prime Farmland, Unique Farmland, or Farmland of Statewide or local Importance. Therefore, the project would not convert an important farmland category designated by the FMMP to a non-agricultural use. Pursuant to the County's Guidelines for Determining

Significance for Agricultural Resources (Agricultural Guidelines), if a site is not an active agricultural operation, has not historically been used for agriculture, and is not designated as Prime Farmland, Unique Farmland, or Farmland of Statewide or local Importance, these lands should not be considered agricultural resources. Therefore, according to the Agricultural Guidelines, the project site is not considered an agricultural resource and there would be no impact.

b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☐ Less than Significant Impact
☒ No Impact

Discussion/Explanation:

No Impact: The project site is zoned Commercial and Office (C36) and Urban Residential (RU), which are not considered to be an agricultural zone. As described above in Section II(a), the project site is not considered an agricultural resource. Additionally, the project site's land is not under a Williamson Act Contract or agricultural preserve. Therefore, the project does not conflict with existing zoning for agricultural use, or a Williamson Act Contract.

c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), or timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☐ Less than Significant Impact
☒ No Impact

Discussion/Explanation:

No Impact: The project site does not contain forest lands or timberland. The County of San Diego does not have any existing Timberland Production Zones. In addition, the project would be consistent with existing zoning, and a rezone of the property is not proposed. Therefore, project implementation would not conflict with existing zoning for, or cause rezoning of, forest land, timberland or timberland production zones.

d) Result in the loss of forest land, conversion of forest land to non-forest use, or involve other changes in the existing environment, which, due to their location or nature, could result in conversion of forest land to non-forest use?

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☐ Less than Significant Impact
☒ No Impact

Discussion/Explanation:

No Impact: The project site, does not contain any forest lands as defined in Public Resources Code section 12220(g). In addition, the project is not located in the vicinity of offsite forest resources. Therefore, project implementation would not result in the loss or conversion of forest land to a non-forest use.

e) Involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Important Farmland or other agricultural resources, to non-agricultural use or conversion of forest land to non-forest use?

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☐ Less than Significant Impact
☒ No Impact

Discussion/Explanation:

No Impact: As described above in Section II(a), the project has been determined to not meet the definition of an agricultural resource pursuant to the Agricultural Guidelines. In addition, the project is not under a Williamson Act Contract or agricultural preserve, nor is the project site located within the vicinity of a Williamson Act Contract or an agricultural preserve. Therefore, the project would not have significant adverse impacts related to the conversion of Important Farmland or other agricultural resource to a non-agricultural use. In addition, as described above in Section II(c) and (d), the project would not result in the loss of forest land or conversion of forest land to non-forest use.

III. AIR QUALITY

Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:

a) Conflict with or obstruct implementation of the San Diego Regional Air Quality Strategy (RAQS) or applicable portions of the State Implementation Plan (SIP)?

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less than Significant Impact
☐ No Impact

Discussion/Explanation: An Air Quality Technical Report was prepared for the project by HELIX Environmental Planning, Inc. (HELIX) dated July 2023 (see Appendix A). The following responses have incorporated the analysis from the report.

Less Than Significant Impact: There are currently no structures requiring demolition prior to construction of the project. Therefore, no demolition would occur as part of the project. The project would produce emissions during construction and operation of the proposed project, as described further in Section III(b).

The RAQS relies on information from the California Air Resources Board (CARB) and San Diego Association of Governments (SANDAG), including population and projected growth in the County, and other source emissions from mobile and area to forecast future emissions. Based on these emissions, the RAQS determines from strategies necessary for the reduction of stationary source emissions through regulatory controls. Mobile source emission projections and growth projections are based on population and vehicle trends and land use plans developed by the cities and the County. As such, projects that propose development consistent with the growth anticipated by the General Plan would be considered consistent with the RAQS. The project site has a General Plan land use designation of Village Residential (VR-24) and General Commercial, and is currently zoned as Commercial and Office (C36) and Urban Residential (RU). With the proposed Major Use Permit, the project would be consistent with the zoning and land use designation. No amendments to the County's General Plan, the Lakeside Community Plan, or County zoning would be required to accommodate the project. Therefore, the project would be consistent with the regional growth assumed in the RAQS and Attainment Plan, and the project would not conflict with or obstruct the implementation of those plans.

Furthermore, as part of its attainment planning process, the San Diego Air Pollution Control Distract (APCD) proposes and adopts Rules and Regulations to control air pollutants to demonstrate further progress toward attainment as part of the RAQS and SIP. The project will also comply with any applicable rules and regulations that have been adopted as part of the RAQS and SIP by the San Diego APCD. Therefore, the project would not conflict with or obstruct the implementation of the RAQS or the SIP, and impacts would be less than significant.

b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?

☐ Potentially Significant Impact	☒ Less than Significant Impact
☐ Less Than Significant With Mitigation Incorporated	☐ No Impact

Discussion/Explanation: The San Diego APCD does not provide quantitative thresholds for determining the significance of construction or mobile source-related impacts. However, the San Diego APCD does specify Air Quality Impact Analysis (AQIA) trigger levels for new or modified stationary sources (APCD Rules 20.2 and 20.3). If these incremental levels for stationary sources are exceeded, an AQIA must be performed for the proposed new or modified source. Although these trigger levels do not generally apply to mobile sources or general land development projects, for comparative purposes these levels may be used to evaluate the increased emissions which would be discharged to the San Diego Air Basin from proposed land development projects. For projects whose stationary-source emissions are below these criteria, no AQIA is typically required, and project level emissions are presumed to be less than significant.

For CEQA purposes, these SLTs can be used to demonstrate that a project's total emissions would not result in a significant impact to air quality. The daily SLTs are most appropriately used for the standard construction and operational emissions. When project emissions have the

potential to approach or exceed the SLTs listed below in Table 1, additional air quality modeling may need to be prepared to demonstrate that ground level concentrations resulting from project emissions (with background levels) will be below National and California Ambient Air Quality Standard (NAAQS and CAAQS, respectively).

APCD Rules 20.2 and 20.3 do not have AQIA thresholds for emissions of volatile organic compounds (VOCs) and $PM_{2.5}$. The use of the screening level for VOCs specified by the South Coast Air Quality Management District (SCAQMD), which generally has stricter emissions thresholds than San Diego's APCD, is recommended for evaluating projects in San Diego County. For $PM_{2.5}$, the EPA "Proposed Rule to Implement the Fine Particle National Ambient Air Quality Standards" published September 8, 2005, which quantifies significant emissions as 10 tons per year, will be used as the screening-level criteria as shown in Table 1 below:

Table 1. San Diego County Screening-Level Thresholds for Air Quality Impact Analysis

Pollutant	Total Emissions		
	Lbs. per Hour	Lbs. per Day	Tons per Year
Respirable Particulate Matter (PM_{10})	---	100	15
Fine Particulate Matter ($PM_{2.5}$)	--- *	55	10*
Nitrogen Oxides (NO_x)	25	250	40
Sulfur Oxides (SO_x)	25	250	40
Carbon Monoxide (CO)	100	550	100
Lead	---	3.2	0.6
Volatile Organic Compounds (VOCs)	---	75**	13.7***

Notes: * EPA "Proposed Rule to Implement the Fine Particle National Ambient Air Quality Standards" published September 8, 2005. Also used by the SCAQMD.
** Threshold for VOCs based on the threshold of significance for VOCs from the SCAQMD for the Coachella Valley.
*** 13.7 Tons Per Year threshold based on 75 lbs/day multiplied by 365 days/year and divided by 2,000 lbs/ton.

Less than Significant Impact: Currently, San Diego County is in "non-attainment" status for the NAAQS and CAAQS federal and state Ozone (O_3) and state Particulate Matter less than or equal to 10 microns and less than or equal to 2.5 microns (PM_{10} and $PM_{2.5}$). O_3 is formed when volatile organic compounds (VOCs) and nitrogen oxides (NO_x) react in the presence of sunlight. VOC sources include any source that burns fuels (e.g., gasoline, natural gas, wood, oil); solvents; petroleum processing and storage; and pesticides. Sources of PM_{10} in both urban and rural areas include the following: motor vehicles, wood burning stoves and fireplaces, dust from construction, landfills, agriculture, wildfires, brush/waste burning, and industrial sources of windblown dust from open lands.
The project would contribute to construction and operational sources of criteria pollutant air emissions. An analysis of estimated construction and operational emissions was completed using SCAQMD's California Emissions Estimator Model (CalEEMod) Version 2022.1.1.12. CalEEMod is a tool used to estimate air emissions resulting from land development projects in the state of California. The model generates air quality emission estimates from construction activities and breaks down operational criteria pollutant emissions into three categories: mobile sources (e.g., traffic), area sources (e.g., landscaping equipment, consumer projects, and architectural coatings), and energy sources (e.g., natural gas heating). CalEEMod provides emission estimates of NO_X, carbon monoxide (CO), oxides of sulfur (SO_X), respirable particulate

matter (PM_{10}), fine particulate matter ($PM_{2.5}$), and ROG. Inputs to CalEEMod include such items as the air basin containing the project, land uses, trip generation rates, trip lengths, duration of construction phases, construction equipment usage, grading areas, as well as other parameters.

Construction Emissions

Project construction activities would include site preparation and clearing, demolition of old concrete and asphalt, grading/excavation, installation of underground utilities, physical building construction, paving, and architectural coating. The project site was rough graded when the existing strip mall was constructed. Project grading activities would consist primarily of excavating for the project building basement level. Construction would require the use of heavy off-road equipment including tractors, loaders, backhoes, water trucks, skid steer loaders, excavators, cranes, forklifts, aerial lifts, pavers, rollers, and air compressors.

Construction is expected to begin early 2024 and take approximately 11 months to complete. Approximately 317 cy of vegetation and debris (approximately 20 truckloads) would be hauled from the project site during site preparations, approximately 20 truckloads of concrete and asphalt would be hauled from the project site during demolition, and approximately of 8,471 cy of soil (approximately 71 truckloads per day) would be exported from the site during grading/excavation. Demolition debris (concrete and asphalt) and soil would be hauled to Ennis, Inc., an approximately 4.3-mile one-way haul distance.

Grading operations associated with the project would be subject to the County of San Diego Grading Ordinance and the San Diego APCD Rule 55, which requires the implementation of dust control measures (e.g., watering, application of surfactants, control of vehicle speeds, etc.) during grading activities. In addition, the Project would utilize low-VOC coatings in accordance with San Diego APCD Rule 67.0.1 requirements.

Table 2. Estimated Daily Construction-Related Air Emissions

Pollutant	Maximum Daily Project Emissions (lbs. per day)	Screening-Level Thresholds (lbs. per day)	Above Threshold?
Respirable Particulate Matter (PM_{10})	0.6	100	No
Fine Particulate Matter ($PM_{2.5}$)	0.4	55	No
Nitrogen Oxides (NO_x)	5.4	250	No
Sulfur Oxides (SO_x)	<0.1	250	No
Carbon Monoxide (CO)	6.7	550	No
Volatile Organic Compounds (VOCs)	47.6	75	No

Source: see Appendix A.
Note: CalEEMod does not report on lead emissions and therefore, it is not included in this analysis.
lbs./day = pounds per day; VOC = volatile organic compound; NO_X = nitrogen oxides; CO = carbon monoxide; SO_X = sulfur oxides; PM_{10} = particulate matter 10 microns or less in diameter; $PM_{2.5}$ = particulate matter 2.5 microns or less in diameter.

As shown in Table 2, construction-related emissions associated with the project are estimated to be well below County's SLTs for criteria pollutants identified in Table 1. As shown in Table 2, construction emissions would not exceed the County's SLTs for any criteria pollutants. As described above, the County's SLTs align with attainment of the NAAQS which were developed to protect the public health, specifically the health of "sensitive" populations, including

asthmatics, children, and the elderly. Therefore, project construction wound not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard, and impacts would be less than significant.

Operational Emissions

The project would include the construction of a self-storage facility, leasing office, and associated parking. Area sources include emissions from landscaping equipment, the use of consumer products, and the reapplication of architectural coatings for maintenance. Energy sources would include electricity for lighting, heating, and cooling. Direct emissions from the burning of natural gas may result from furnaces and hot water heaters. In addition, operational emissions from mobile sources are associated with project-related vehicle trip generation and trip length.

Table 3, *Estimated Daily Operational Air Emissions*, provides the project operational emissions compared to the County SLTs.

Table 3. Estimated Daily Operational Air Emissions

Pollutant	Project Emissions (Lbs. per Day)	Screening-Level Thresholds (Lbs. per Day)	Above Threshold?
Respirable Particulate Matter (PM_{10})	0.6	100	No
Fine Particulate Matter ($PM_{2.5}$)	0.2	55	No
Nitrogen Oxides (NO_x)	1.6	250	No
Sulfur Oxides (SO_x)	<0.1	250	No
Carbon Monoxide (CO)	11.9	550	No
Volatile Organic Compounds (VOCs)	3.9	75	No

Source: see Appendix A.
Note: CalEEMod does not report on lead emissions and therefore, it is not included in this analysis. Totals may not sum due to rounding. lbs./day = pounds per day; VOC = volatile organic compounds; NO_X = nitrogen oxides; CO = carbon monoxide; SO_X = sulfur oxides; PM_{10} = particulate matter 10 microns or less in diameter; $PM_{2.5}$ = particulate matter 2.5 microns or less in diameter

As shown in Table 3, emissions generated during project operation would not exceed the County's SLTs for any criteria pollutant. As described above, the County's SLTs align with attainment of the NAAQS which were developed to protect the public health, specifically the health of "sensitive" populations, including asthmatics, children, and the elderly. Because vehicular emissions decrease over time with phase-out of older vehicles and implementation of increasingly stringent emission controls, future emissions would decrease. Therefore, project operation would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard, and impacts would be less than significant.

Cumulative Project Emissions

Cumulative construction impacts would exist when multiple construction projects occur at the same time and when those construction project maximum exposure contours intersect. To illustrate this, if a project were to produce air quality emissions simultaneous to a nearby construction project the addition of both project emissions could exceed significance thresholds. For this project, the construction emissions are well below significance as shown in Table 2

above. The only approved or pending cumulative project in the project vicinity would be renovations to the existing commercial/retail buildings immediately north of the project site. It is anticipated that only interior renovation to the building north of the project site would have the potential to overlap with project construction. Interior renovations to the existing building would not be expected to generate consequential criteria pollutant emissions. In addition, the project's operational emissions are below the SLTs established by the County guidelines for determining significance; therefore, a significant cumulative impact would not result, and the proposed project's contribution to such an impact would be less than cumulatively considerable. Therefore, cumulative construction and operational impacts would be less than significant.

c) Expose sensitive receptors to substantial pollutant concentrations?

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less than Significant Impact
☐ No Impact

Discussion/Explanation: Air quality regulators typically define sensitive receptors as schools (Preschool-12th Grade), hospitals, resident care facilities, or day-care centers, or other facilities that may house individuals with health conditions that would be adversely impacted by changes in air quality. The County of San Diego also considers residences as sensitive receptors because they house children and the elderly.

Less Than Significant Impact: The closest existing sensitive receptors to the project site are multifamily apartment buildings approximately 60 feet south of the project site and single-family residences approximately 65 feet east of the project site, across Cactus Street. Two daycare centers are located approximately 400 feet east and 410 feet northeast of the project site. The closest school is Lemon Crest Elementary School approximately 1,065 feet (0.2 mile) southeast of the project site.

CO Hotspots
Elevated CO levels can occur at or near intersections that experience severe traffic congestion. A localized air quality impact is considered significant if the additional CO emissions resulting from the project create a "hotspot" where the California 1-hour standard of 20.0 ppm or the 8-hour standard of 9 ppm is exceeded. This can occur at severely congested intersections during cold winter temperatures. The last recorded maximum 8-hour average CO level for the San Diego Air Basin was in 2012 at 3.61 parts per million (ppm), which is well below the 9 ppm state and federal eight-hour standard (Appendix A). No monitoring stations located in the San Diego Air Basin have data for CO since 2012.

A CO hotspot analysis is required by the County if a proposed development would cause road intersections to operate at or below a LOS E with intersection peak-hour trips exceeding 3,000 trips. The project would generate approximately 19 peak-hour trips during operation. The highest volume intersection would be the intersection of Woodside Avenue and Channel Road, which is predicted to carry up to 1,169 peak-hour trips on Woodside Drive and up to 849 peak-hour trips on Channel Road in 2025, including project-generated trips (Appendix A). The predicted maximum volume for project-affected intersections would be 2,018 peak-hour trips (Woodside

Avenue trips plus Channel Road trips), which is less than the 3,000 vehicle trip peak-hour significance criteria for CO hotspots. Therefore, the project would not result in the formation of CO hotspots. Impacts to sensitive receptors resulting from CO hotspots would be less than significant.

Toxic Air Contaminants (TACs)
Project construction would result in on-site emissions of the Diesel Particulate Matter (DPM), a TAC, from the use of off-road diesel equipment required for demolition, site preparation, grading, underground utilities, and other construction activities. Health-related risks associated with DPM emissions are primarily linked to long-term exposure and the associated risk of contracting cancer. The amount to which the receptors could be exposed, which is a function of concentration and duration of exposure, is the primary factor used to determine health risks. The generation of TAC emissions during construction would be variable and sporadic due to the nature of construction activity. The total project construction period would be approximately 11 months, and the earth-moving activities (site preparation, demolition, grading, and underground utilities) would last approximately one month. Land uses which are typically considered potential operational sources of TACs include distribution centers, rail yards, ports, petroleum refineries, plating operations, dry cleaning facilities, and gasoline dispensing facilities (CARB 2005). The project does not include any of these land uses and, once operational, the project would not include diesel-powered backup generators (a source of DPM) or any other stationary source of TACs. Therefore, operation of the project would not be a substantial source of TAC emissions. Due to the short duration of emissions and the variable and sporadic nature of construction activities (Appendix A), project-related TAC emissions would not expose sensitive receptors to substantial pollutant concentrations, and the impact would be less than significant.

In addition, the project would not contribute to a cumulatively considerable exposure of sensitive receptors to substantial pollutant concentrations because the proposed project as well as the listed projects have emissions below the screening-level criteria established by the LUEG guidelines for determining significance.

d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

☐ Potentially Significant Impact	☒ Less than Significant Impact
☐ Less Than Significant With Mitigation Incorporated	☐ No Impact

Discussion/Explanation:

Less Than Significant Impact: San Diego APCD Rule 51, commonly referred to as the public nuisance rule, prohibits emissions from any source whatsoever in such quantities of air contaminants or other material that cause injury, detriment, nuisance, or annoyance to the public health or damage to property. The potential for an operation to result in odor complaints from a “considerable” number of persons in the area would be considered to be a significant, adverse odor impact.

According to the San Diego County Guidelines for Determining Significance for Air Quality, land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. The project, involving a self-storage facility, would not include any of these uses. Project construction could result in minor amounts of odors associated with unburned hydrocarbons in diesel heavy equipment exhaust. The odor of these diesel exhausts is objectionable to some; however, emissions would be intermittent and would disperse rapidly, and, therefore, would not affect a substantial number of people. Because the construction equipment would be operating at various locations throughout the construction site, and because any operation that would occur in the vicinity of existing receptors would be temporary, impacts associated with odors during the construction and operation of the project would be less than significant.

IV. BIOLOGICAL RESOURCES

Would the project:

a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or CDFW or U.S. Fish and Wildlife Service?

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☐ Less than Significant Impact
☒ No Impact

Discussion/Explanation:

No Impact: Based on an analysis of the County's Geographic Information System (GIS) records, the County's Comprehensive Matrix of Sensitive Species, and site photos, it has determined that no native vegetation communities or habitats exist on or adjacent to the project site because it has been completely disturbed. Based on these considerations, no direct or indirect impacts to sensitive natural communities supporting candidate, sensitive, or special status species would occur. Further, properties surrounding the project site are developed with commercial uses and a multi-family housing complex. The proposed project would develop a self-storage facility, which would be compatible with surrounding land uses. Therefore, the project would not have a substantial adverse effect on any candidate, sensitive, or special status species and would not contribute to cumulative impacts to these designated species.

b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☐ Less than Significant Impact
☒ No Impact

Discussion/Explanation:

No Impact: Based on an analysis of the County's GIS records, aerial imagery of the site, and site photos, County staff has determined that the proposed project site does not contain any riparian habitat or other sensitive natural communities as defined by the County of San Diego Multiple Species Conservation Program (MSCP), County of San Diego Resource Protection Ordinance (RPO), Natural Community Conservation Plan (NCCP), Fish and Wildlife Code, Endangered Species Act, Clean Water Act, or any other local or regional plans, policies or regulations. Further, properties surrounding the project site are developed with commercial uses and a multi-family housing complex. The proposed project would develop a self-storage facility, which would be compatible with surrounding land uses. In addition, no riparian habitat or other sensitive natural community has been identified within or adjacent to the area proposed for off-site impacts resulting from road improvements, utility extensions, etc. Therefore, the project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community.

c) Have a substantial adverse effect on federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☐ Less than Significant Impact
☒ No Impact

Discussion/Explanation:

No Impact: The proposed project site does not contain any wetlands as defined by Section 404 of the Clean Water Act, including, but not limited to, marsh, vernal pool, stream, lake, river or water of the U.S., that could potentially be impacted through direct removal, filling, hydrological interruption, diversion or obstruction by the proposed development. Therefore, no impacts would occur to wetlands defined by Section 404 of the Clean Water Act and under the jurisdiction of the Army Corps of Engineers

d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☐ Less than Significant Impact
☒ No Impact

Discussion/Explanation:

No Impact: Based on an analysis of the County's GIS records, aerial imagery of the site, and the County's Comprehensive Matrix of Sensitive Species, it has been determined that the site is not part of a regional linkage/corridor as identified on MSCP maps nor is it in an area considered regionally important for wildlife dispersal. The site has been completely disturbed and contains

no native vegetation or habitats. Therefore, the site would not assist in local wildlife movement as it lacks connecting vegetation and visual continuity with other potential habitat areas in the general project vicinity. The project would not interfere with the movement of any native resident or migratory fish or wildlife species, or established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.

e) Conflict with the provisions of any adopted Habitat Conservation Plan, Natural Communities Conservation Plan, other approved local, regional or state habitat conservation plan or any other local policies or ordinances that protect biological resources?

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less than Significant Impact
☐ No Impact

Discussion/Explanation: An MSCP Conformance Statement was prepared by County staff for the project dated May 2022 (Appendix B). The following response has incorporated the analysis from the MSCP Conformance Statement.

Less Than Significant Impact: The project site is located within the Metro-Lakeside-Jamul segment of the County's MSCP Subarea Plan. The project is therefore required to conform to the MSCP and the Biological Mitigation Ordinance (BMO). There are no sensitive habitats or species within the proposed project area. The site is entirely urban/developed and does not support native vegetation. As a Tier IV habitat, no on-site preservation is required and impacts to urban/developed do not require mitigation under the BMO. No impacts to wildlife corridors or linkages would occur as the project site does not support geological, topographic, or habitat features that would function in a corridor capacity. Furthermore, the site is not classified as a Biological Resource Core Area as it is not within the Pre-Approved Mitigation Area, is not within or adjacent to a large block of undisturbed habitat, is not mapped as having high habitat value, and does not support sensitive species. Given the current site conditions and the surrounding land uses, development of the proposed self-storage facility would not hinder the formation of a future preserve system. The proposed project is found to be in conformance with the MSCP and the BMO, and impacts would be less than significant.

V. CULTURAL RESOURCES

Would the project:

a) Cause a substantial adverse change in the significance of a historical resource as defined in 15064.5?

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☐ Less than Significant Impact
☒ No Impact

Discussion/Explanation: A Cultural Resources Survey Report was prepared for the project by County staff (Sandra Pentney), dated November 2021 (Appendix C). Additionally, a Cultural

Resources Review was prepared, dated July 2022 (Appendix D). The following responses have incorporated the analyses from these reports.

No Impact: Based on an analysis of records and a survey of the property by a County of San Diego staff archaeologist, it has been determined that would be no impacts to historical resources because they do not occur within the project site. The results of the survey are provided in Appendix C.

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to 15064.5?

☐ Potentially Significant Impact	☐ Less than Significant Impact
☒ Less Than Significant With Mitigation Incorporated	☐ No Impact

Discussion/Explanation:

Less than Significant with Mitigation Incorporated: According to the Cultural Resources Survey Report (Appendix C), no artifacts or features were identified at the project site. The northeast corner of the property was highly disturbed by rodent burrows. This area was intensively examined to see if the rodent activity had brought artifacts to the surface. Most of the surrounding area has been developed; however, a review of historic aerial photographs showed that this portion of the parcel has never been developed. However, the project site has the potential to contain undisturbed, buried archaeological deposits, and the project may inadvertently impact undiscovered significant archaeological deposits or features during grading. Mitigation Measures CUL-1 and CUL-2 listed below would reduce potentially significant impacts to below a level of significance. Therefore, with implementation of Mitigation Measures **CUL-1** and **CUL-2**, the project would not cause a substantial adverse change in the significance of an archaeological resource pursuant to Section §15064.5, and impacts would be less than significant with mitigation.

In addition, implementation of projects listed in Section XXI(b) could have the potential to result in impacts to archaeological resources. Projects would be required to comply with applicable regulations and implement any required mitigation measures. The project would result in a less than significant impact. Therefore, the project, together with other cumulative projects, would not contribute to cumulatively considerable impact related to archaeological resources.

CUL-1 Archeological Monitoring

In order to mitigate for potential impacts to undiscovered buried archaeological resources and human remains, an Archaeological Monitoring Program and potential Data Recovery Program shall be implemented pursuant to the County of San Diego Guidelines for Determining Significance for Cultural Resources and the California Environmental Quality Act (CEQA).

DESCRIPTION OF REQUIREMENT: A County Approved Principal Investigator (PI) known as the “Project Archaeologist,” shall be contracted to perform archaeological monitoring and a potential data recovery program during all grading, clearing, grubbing, trenching, and construction activities. The archaeological monitoring program shall include the following:

1. The Project Archaeologist shall perform the monitoring duties before, during and after construction pursuant to the most current version of the County of San Diego Guidelines for Determining Significance and Report Format and Requirements for Cultural Resources. The Project Archaeologist and Kumeyaay Native American monitor shall also evaluate fill soils to determine that they are clean of cultural resources. The contract or letter of acceptance provided to the County shall include an agreement that the archaeological monitoring would be completed, and a Memorandum of Understanding (MOU) between the Project Archaeologist and the County of San Diego shall be executed. The contract or letter of acceptance shall include a cost estimate for the monitoring work and reporting.
2. The Project Archeologist shall provide evidence that a Kumeyaay Native American has been contracted to perform Native American Monitoring for the project.
3. The cost of the monitoring shall be added to the grading bonds or bonded separately.

DOCUMENTATION: The applicant shall provide a copy of the Archaeological Monitoring Contract or letter of acceptance, cost estimate, and MOU to County Planning and Development Services (PDS) Project Planning Division (PPD). Additionally, the cost amount of the monitoring work shall be added to the grading bond cost estimate.

TIMING: Prior to approval of any grading and or improvement plans and issuance of any Grading or Construction Permits.

MONITORING: PDS PPD shall review the contract or letter of acceptance, MOU and cost estimate or separate bonds for compliance with this condition. The cost estimate should be forwarded to PDS PPD for inclusion in the grading bond cost estimate, and grading bonds and the grading monitoring requirement shall be made a condition of the issuance of the grading or construction permit.

CUL-2 Cultural Resources Monitoring Report
In order to ensure that the Archaeological Monitoring occurred during the earth-disturbing activities, a final report shall be prepared.

DESCRIPTION OF REQUIREMENT: A final Archaeological Monitoring and Data Recovery Report that documents the results, analysis, and conclusions of all phases of the Archaeological Monitoring Program shall be prepared. The report shall include the following items:

A. DPR Primary and Archaeological Site forms.
B. Daily Monitoring Logs
C. Evidence that all cultural materials collected during the survey, testing, and archaeological monitoring program have been conveyed as follows:
    a. All prehistoric cultural materials shall be curated at a San Diego curation facility or a culturally affiliated Tribal curation facility that meets federal standards per 36 CFR Part 79, and, therefore, would be professionally curated and made available to other archaeologists/researchers for further study. The collections and associated records, including title, shall be transferred to the San Diego curation facility or culturally affiliated Tribal curation facility and shall be accompanied by payment of the fees necessary for permanent curation. Evidence shall be in the

form of a letter from the curation facility stating that the prehistoric archaeological materials have been received and that all fees have been paid.

or

Evidence that all prehistoric materials collected during the archaeological monitoring program have been returned to a Native American group of appropriate tribal affinity. Evidence shall be in the form of a letter from the Native American tribe to whom the cultural resources have been repatriated identifying that the archaeological materials have been received.

b. Historic materials shall be curated at a San Diego curation facility as described above and shall not be curated at a Tribal curation facility or repatriated. The collections and associated records, including title, shall be transferred to the San Diego curation facility and shall be accompanied by payment of the fees necessary for permanent curation. Evidence shall be in the form of a letter from the curation facility stating that the historic materials have been received and that all fees have been paid.

D. If no cultural resources are discovered, a Negative Monitoring Report must be submitted stating that the grading monitoring activities have been completed. Grading Monitoring Logs must be submitted with the negative monitoring report.

DOCUMENTATION: The applicant's archaeologist shall prepare the final report and submit it to PDS PPD for approval. Once approved, a final copy of the report shall be submitted to the South Coastal Information Center (SCIC) and any culturally-affiliated Tribe who requests a copy.

TIMING: Prior to any occupancy, final grading release, or use of the premises in reliance of this permit, the final report shall be prepared.

MONITORING: PDS PPD shall review the final report for compliance this condition and the report format guidelines. Upon acceptance of the report, PDS PPD shall inform PDS Land Development Review (LDR) and the County Department of Public Works (DPW) Private Development Construction Inspection (PDCI) that the requirement is complete and the bond amount can be relinquished. If the monitoring was bonded separately, then PDS PPD shall inform PDS or DPW Fiscal Services to release the bond back to the applicant.

c) Disturb any human remains, including those interred outside of formal cemeteries?

☐	Potentially Significant Impact	☒	Less than Significant Impact
☐	Less Than Significant With Mitigation Incorporated	☐	No Impact

Discussion/Explanation:

Less than Significant Impact: Based on an analysis of records and a survey of the property by a County staff archaeologist, it has been determined that the project would not disturb any human remains because the project site does not include a formal cemetery or any archaeological resources that might contain interred human remains. There are no dedicated cemeteries or recorded burials within the project footprint or surrounding vicinity. In the unlikely event that unknown human burials are encountered during project grading and construction, the

resource(s) would be handled in accordance with procedures of the Public Resources Code Section 5097.98, the California Government Code Section 27491, and the Health and Safety Code Section 7050.5. These regulations detail specific procedures to follow in the event of the discovery of human remains. Therefore, the project would not disturb any human remains, including those interred outside of dedicated cemeteries, and impacts would be less than significant.

In addition, implementation of projects listed in Section XXI(b) could have the potential to result in impacts to human remains. Projects would be required to comply with applicable regulations and implement any required mitigation measures. The project would result in a less than significant impact. Therefore, the project, together with other cumulative projects, would not contribute cumulatively considerable impact related to human remains.

VI. ENERGY

Would the project:

a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

☐	Potentially Significant Impact	☒	Less than Significant Impact
☐	Less Than Significant With Mitigation Incorporated	☐	No Impact

Discussion/Explanation:

Less than Significant Impact: Energy use associated with the project was calculated as part of the air quality and greenhouse gas (GHG) modeling detailed in Section III, Section VIII, respectively (see also Appendix A and Appendix E).

Construction-Related Energy Use
During construction, energy use would occur in two general categories: fuel use from vehicles used by workers commuting to and from the construction site, and fuel use by vehicles and other equipment to conduct construction activities. Workers associated with project construction would generate trips during the building construction phase. Fuel consumption associated with construction worker commute would be similar of any other typical commute in San Diego County. Fuel use associated with construction workers and materials delivery during construction is necessary to get workers and building materials to the project site and is not considered to be wasteful, inefficient, or unnecessary.

Project construction would include the use of tractors/loaders/backhoes, dozers, excavators, scrapers, cranes, forklifts, generators, welders, pavers, rollers, paving equipment, and air compressors. Consistent with state requirements, all construction equipment would meet CARB Tier 3 In-Use Off-Road Diesel Engine Standards. Engines are required to meet certain emission standards, and groups of standards are referred to as Tiers. A Tier 0 engine is unregulated with no emission controls, and each progression of standard level (i.e., Tier 1, Tier 2, Tier 3, etc.)

generates lower emissions, uses less energy, and is more advanced technologically than the previous tier. CARB's Tier 3 In-Use Off-Road Diesel Engine Standards requires that construction equipment fleets become cleaner and use less energy over time. There are no known conditions in the project area that would require nonstandard equipment or unusual construction practices that would increase onsite heavy-duty construction equipment use. Additionally, construction activities would be temporary and short-term and would adhere to all standard construction best management practices (BMPs). Therefore, project construction would not result in the use of excessive amounts of fuel or other forms of energy, and impacts would be less than significant.

Operational Energy Use
During operation, energy use would be associated with building-related energy use (i.e., electricity) and transportation-related fuel use (i.e., gasoline, diesel fuel, and EVs).

Building Energy Use
Building energy use would be associated with electricity. Energy use associated with a project is also related to natural gas; however, the project would be all electric and would not include natural gas appliances (see Section VII[a]). The project would be required to adhere to state regulations enforced to ensure energy efficiency and reduction of wasteful energy consumption, including the California Energy Efficiency Standards for Residential and Nonresidential Buildings (California Code of Regulations, Title 24, Part 6; California Energy Code) and the California Green Building Standards Code (CALGreen). The California Energy Code (2022 Energy Code) establishes energy-efficiency standards for residential buildings to reduce California's energy consumption. The 2022 Energy Code increases onsite renewable energy generation from solar, increases electric load flexibility to support grid reliability, reduces emissions from newly constructed buildings, reduces air pollution for improved public health, and encourages adoption of environmentally beneficial efficient electric technologies. New construction and major renovations must demonstrate their compliance with the current Energy Code through submission and approval of a Title 24 Compliance Report to the local building permit review authority and the California Energy Commission. The 2022 CALGreen Code institutes mandatory minimum environmental performance standards for all ground-up new construction of non-residential and residential structures. Local jurisdictions must enforce the minimum mandatory CALGreen standards and may adopt additional amendments for stricter requirements. The mandatory measures are related to planning and design, energy efficiency, water efficiency and conservation, material conservation and resource efficiency, and environmental quality.

The Renewable Portfolio Standard (RPS) promotes diversification of the state's electricity supply and decreased reliance on fossil fuel energy sources. Once operational, the project would be served by the San Diego Gas & Electric Company (SDG&E). Based on their most recent annual report, SDG&E has already procured 39 percent renewable energy and is on track to procure 60 percent by 2030 (California Public Utilities Commission 2021). Once operational, the project would use electricity to run various appliances and equipment, including space and water heaters, air conditioners, ventilation equipment, lights, and numerous other devices. Generally, electricity use is higher in the warmer months due to increased air conditioning needs. Overall, the project would incorporate energy efficient design measures and construction features to meet California and local standards. For example, the project would include the installation of a 160 kW solar array on the roof of the main storage building in accordance with Title 24 Building

Energy Efficiency Standards. The project would also not conflict with energy reduction policies of the County General Plan, including COS-14.3, which requires new development to implement sustainable practices to conserve energy. Therefore, the construction and operation of the project is not expected to result in the wasteful or inefficient use of energy, and impacts would be less than significant.

Transportation-Related Energy Use

Vehicle trips by individuals traveling to and from the project site would result in transportation energy use. Vehicles would be mostly powered by gasoline, with some fueled by diesel or electricity. The project's parking area would include EV-ready spaces and parking spaces with EV charging equipment installed, supporting the use of EVs. There is no component of the project that would result in unusually high vehicle fuel use during operation. As described further in Section XVI(b), the project meets the CEQA vehicle miles traveled (VMT) screening criteria for projects located in Infill Village Area and would not result in a significant VMT impact. Therefore, operation of the project would not create a land use pattern that would result in wasteful, inefficient, or unnecessary use of energy, and impacts would be less than significant.

Projects listed in Section XXI(b) would also be required to comply with increasingly stringent statewide energy efficiency regulations, such as the Title 24 building standards to encourage energy-efficient development and land use patterns that reduce VMT, which would avoid inefficient use of energy. Therefore, the project's contribution to cumulative impacts related to energy consumption would not be cumulatively considerable.

b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

☐	Potentially Significant Impact	☒	Less than Significant Impact
☐	Less Than Significant With Mitigation Incorporated	☐	No Impact

Discussion/Explanation:

Less than Significant Impact: Many of the regulations regarding energy efficiency are focused on increasing the energy efficiency of buildings and renewable energy generation, as well as reducing water consumption and VMT. The project would be constructed in accordance with energy efficiency standards effective at the time building permits are issued, which assuming 2022 standards, would result in a decrease energy consumption by 30 percent for non-residential buildings when compared to the 2016 Title 24 Energy Code. The project would not conflict with energy reduction policies of the County General Plan, including COS-14.3, which requires new development to implement sustainable practices to conserve energy. Through compliance with the 2022 Building Energy Efficiency Standards at the time of project construction, the project would implement energy reduction design features and comply with the most recent energy building standards consistent with applicable plans and policies, as described above in Section VI(a). Therefore, impacts would be less than significant.

VII. GEOLOGY AND SOILS

Would the project:

a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☐ Less than Significant Impact
☒ No Impact

Discussion/Explanation: A Preliminary Geotechnical Evaluation was prepared for the proposed project by LGC Geotechnical, Inc. (Appendix F). The responses below have incorporated the analysis from the report.

No Impact: The project is not located in a fault rupture hazard zone identified by the Alquist-Priolo Earthquake Fault Zoning Act, Special Publication 42, Revised 1997, Fault-Rupture Hazards Zones in California, or located within any other area with substantial evidence of a known fault. The nearest known active fault to the project site is the Newport-Inglewood-Rose Canyon Fault Zone located approximately 16.8 miles west of the site. Therefore, there would be no impact from the exposure of people or structures to adverse effects from a known fault-rupture hazard zone as a result of this project.

ii. Strong seismic ground shaking?

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less than Significant Impact
☐ No Impact

Discussion/Explanation:

Less Than Significant Impact: The project site is located in the seismically active southern California region. Grading associated with the project would be required to conform to the grading requirements outlined in the County Grading, Clearing, and Watercourses Ordinance (Grading Ordinance) and be verified in the field by a licensed or registered Civil Engineer and inspected by County Grading Inspectors. In order to assure that the proposed buildings are adequately supported, a Soils Engineering Report is required as part of the Building Permit process. This Report would evaluate the strength of underlying soils and make recommendations on the design of building foundation systems. The Soils Engineering Report must demonstrate that a proposed building meets the structural stability standards required by the California Building Code. The Report must be approved by the County prior to the issuance

of a Building Permit. Therefore, the Grading Plan prepared by the registered Civil Engineer, compliance with the Grading Ordinance, and the Soils Engineering Report would ensure that the project would not expose people or structures to potential adverse effects from strong seismic ground shaking, and impacts would be less than significant.

iii. Seismic-related ground failure, including liquefaction?

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less than Significant Impact
☐ No Impact

Discussion/Explanation:

Less Than Significant Impact: The project site is located within a "Potential Liquefaction Area" as identified in the County Guidelines for Determining Significance for Geologic Hazards. Grading associated with the project would be required to conform to the grading requirements outlined in the County Grading, Clearing, and Watercourses Ordinance (Grading Ordinance) and be verified in the field by a licensed or registered Civil Engineer and inspected by County Grading Inspectors. In order to assure that the proposed buildings are adequately supported, a Soils Engineering Report is required as part of the Building Permit process. This Report would evaluate the strength of underlying soils and make recommendations on the design of building foundation systems. The Soils Engineering Report must demonstrate that a proposed building meets the structural stability standards required by the California Building Code. The Report must be approved by the County prior to the issuance of a Building Permit. In addition, the project would be constructed in accordance with the recommendations outlined in the Preliminary Geotechnical Evaluation (Appendix F). With a site-specific engineering design and conformance with the Grading Plan, Grading Ordinance, and Soils Engineering Report , impacts due to liquefaction would be less than significant.

iv. Landslides?

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less than Significant Impact
☐ No Impact

Discussion/Explanation:

Less Than Significant Impact: The site is located within a "Landslide Susceptibility Area" as identified in the County Guidelines for Determining Significance for Geologic Hazards. Landslide Susceptibility Areas were developed based on landslide risk profiles included in the *Multi-Jurisdictional Hazard Mitigation Plan, San Diego, CA* (URS, 2004). Landslide risk areas from this plan were based on data including steep slopes (greater than 25 percent); soil series data (SANDAG based on USGS 1970s series); soil-slip susceptibility from USGS; and Landslide Hazard Zone Maps (limited to western portion of the County) developed by the California Department of Conservation, Division of Mines and Geology (DMG). However, the project site is flat and has been previously graded. Additionally, site reconnaissance, examination of aerial photographs, and review of available geologic information conducted as a part of the Preliminary

Geotechnical Evaluation did not identify evidence of landslides on the project site or within the surrounding area (Appendix F). Therefore, the project would not expose people or structures to potential adverse effects from landslides, and impacts would be less than significant.

b) Result in substantial soil erosion or the loss of topsoil?

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less than Significant Impact
☐ No Impact

Discussion/Explanation:

Less than Significant Impact: The project site consists of VaA (Visalia sandy loam, 0 to 2 percent slopes) and TuB (Tujunga sand, 0 to 5 percent slopes). Construction of the project would include site grading and building foundation excavation, which have the potential to release sediment into downstream receiving waters. Additionally, the Priority Development Plan (PDP) – Stormwater Quality Management Plan (SWQMP) prepared for the project by Omega Consulting Engineering, dated November 2023, includes identifies site-specific BMPs to control erosion, sediment, and other potential construction-related pollutants (Appendix F). The SWQMP contains a discussion of the proposed construction BMPs to be implemented for the project, which would meet the requirements of the County BMP Design Manual. Such BMPs include vegetation stabilization planting, bonded fixed matrix, fiber rolls, storm drain inlet protection, stabilized construction entrance, street sweeping, material delivery and storage, spill prevention and control, waste management concrete waste management, solid waste management, and sanitary waste management that would prevent soil erosion and loss of topsoil. The project would introduce landscaping in order to stabilize and preserve soils in the post-project condition. By keeping soil stabilized using BMPs and with effective site management minimizing soil erosion the SWQMP specifications and guidelines demonstrates minimal to less than significant soil erosion shall occur during project grading.

The project would not result in substantial soil erosion or the loss of topsoil for the following reasons:

- The project would not result in unprotected erodible soils.
- The project is not located in a floodplain.
- A Standard PDP – SWQMP and Preliminary Drainage Report (November 2023) have been prepared by Omega Consulting Engineering for the project (see Section IX, Hydrology and Water Quality).
- The project would be required to comply with the County's Grading Ordinance [San Diego County Code of Regulations, Title 8, Zoning and Land Use Regulations, Division 7, Sections 87.414 (DRAINAGE - EROSION PREVENTION) and 87.417 (PLANTING)]. Compliance with these regulations would minimize the potential for water and wind erosion.

Therefore, the project would not result in substantial soil erosion or the loss of topsoil, and impacts would be less than significant.

In addition, the project would not contribute to a cumulatively considerable impact because all of the past, present, and future projects that involve grading or land disturbance are required to follow the requirements of the San Diego County Code of Regulations, Title 8, Zoning and Land Use Regulations, Division 7, Sections 87.414 (DRAINAGE – EROSION PREVENTION) and 87.417 (PLANTING); Order 2001-01 (NPDES No. CAS 0108758), adopted by the San Diego Regional Water Quality Control Board (RWQCB) on February 21, 2001; County Watershed Protection, Storm Water Management, and Discharge Control Ordinance (Ord. No. 9424); and County Stormwater Standards Manual adopted on February 20, 2002, and amended January 10, 2003 (Ordinance No. 9426). See Section XXI(b) for a comprehensive list of the projects considered. Impacts would be less than significant.

c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in an on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less than Significant Impact
☐ No Impact

Discussion/Explanation:

Less Than Significant Impact: The project site was rough graded when the existing strip mall was constructed. Project grading activities would consist primarily of excavating for the project building basement level. The project would require 486 cy of fill, 8,131 cy of cut, and the export of 8,471 cy of soil. Grading associated with the project would be required to conform to the grading requirements outlined in the County Grading, Clearing, and Watercourses Ordinance (Grading Ordinance) and be verified in the field by a licensed or registered Civil Engineer and inspected by County Grading Inspectors. In order to assure that the proposed buildings are adequately supported, a Soils Engineering Report is required as part of the Building Permit process. This Report would evaluate the strength of underlying soils and make recommendations on the design of building foundation systems. The Soils Engineering Report must demonstrate that a proposed building meets the structural stability standards required by the California Building Code. The Report must be approved by the County prior to the issuance of a Building Permit. In addition, the project would be constructed in accordance with the recommendations outlined in the Preliminary Geotechnical Evaluation (Appendix F). With this standard requirement, impacts would be less than significant. For further information regarding landslides, liquefaction, and lateral spreading, refer to Section VII(a)(iii) through (iv) above.

See Section XXI(b) for a comprehensive list of the projects considered. Due to the localized nature of geology and soils, cumulative projects would address potential impacts to geology and soils on a project-by-project basis, as potential geologic hazards and soil composition varies by site. Each cumulative project would be required to assess individual and site-specific geologic conditions, which would inform construction and development of each site. All cumulative development would be subject to similar requirements to those imposed and implemented for the project and would be required to adhere to applicable regulations, standards, and procedures. As such, the project's incremental contribution to cumulative geologic impacts would

not be cumulatively considerable, and cumulative geological impacts would be less than significant.

d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less than Significant Impact
☐ No Impact

Discussion/Explanation:

Less Than Significant Impact: The project does not contain expansive soils as defined by Table 18-I-B of the Uniform Building Code (1994). The soils on-site are VaA (Visalia sandy loam, 0 to 2 percent slopes) and TuB (Tujunga sand, 0 to 5 percent slopes). These soils have a shrink-swell behavior of low and represent no substantial risks to life or property. This was confirmed by staff review of the Soil Survey for the San Diego Area, prepared by the U.S. Department of Agriculture, Soil Conservation and Forest Service, dated December 1973. Therefore, the project would not create a substantial risk to life or property, and impacts would be less than significant.

e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☐ Less than Significant Impact
☒ No Impact

Discussion/Explanation:

No Impact: The project would rely on public water and sewer for the disposal of wastewater. No septic tanks or alternative wastewater disposal systems are proposed. No impact would occur.

f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☐ Less than Significant Impact
☒ No Impact

Discussion/Explanation: Impacts to paleontological resources occur when excavation activities encounter fossiliferous geological deposits and cause physical destruction of fossil remains. Fossil remains, fossil sites, fossil-producing geologic formations, and geologic formations with the potential for containing fossil remains are all considered paleontological resources or have the potential to be paleontological resources. Fossil remains are considered important if they are well preserved, identifiable, type/topotypic specimens, age diagnostic, useful in environmental

reconstruction, and/or represent new, rare, and/or endemic taxa. The potential for impacts on fossils depends on the sensitivity of the geologic unit and the amount and depth of grading and excavation.

Less Than Significant Impact: The site does not contain any unique geologic features that have been listed in the County's Guidelines for Determining Significance for Unique Geology Resources nor does the site support any known geologic characteristics that have the potential to support unique geologic features. As such, a paleontological monitoring program would not be required. Therefore, the project would not directly or indirectly destroy a unique paleontological resource or site or unique geologic feature. Impacts would be less than significant.

VII. GREENHOUSE GAS EMISSIONS

Would the project:

a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

- ☐ Potentially Significant Impact
- ☐ Less Than Significant With Mitigation Incorporated
- ☒ Less than Significant Impact
- ☐ No Impact

Discussion/Explanation: A Greenhouse Gas Emissions Technical Report was prepared for the project by HELIX, dated July 2023 (see Appendix E). The following responses have incorporated the analysis from the report.

Less Than Significant Impact: State CEQA Guidelines Section 15064.4 states that "the determination of the significance of GHG calls for careful judgment by the lead agency, consistent with the provisions in Section 15064. A lead agency should make a good-faith effort, based to the extent possible on scientific and factual data, to describe, calculate, or estimate the amount of greenhouse gas emissions resulting from a project." Section 15064.4(b) further states that a lead agency should consider the following non-exclusive factors when assessing the significance of GHG emissions:

1. The extent to which the project may increase or reduce GHG emissions as compared to the existing environmental setting;
2. Whether the project emissions exceed a threshold of significance that the lead agency applies to the project; and
3. The extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions.

State CEQA Guidelines Section 15064(h)(1) states that "the lead agency shall consider whether the cumulative impact is significant and whether the effects of the project are cumulatively considerable." A cumulative impact may be significant when the project's incremental effect, though individually limited, is cumulatively considerable.

The County General Plan incorporates smart growth and land planning principles intended to reduce VMT, and thereby reduce GHG emissions. Specifically, the General Plan directed preparation of a County Climate Action Plan (CAP) with reduction targets; development of regulations to encourage energy efficient building design and construction; and development of regulations that encourage energy recovery and renewable energy facilities, among other actions. These planning and regulatory efforts are intended to ensure that actions of the County do not impede Assembly Bill 32 (AB 32) 32 and Senate Bill (SB) 375 mandates.

As such, on February 14, 2018, the County Board of Supervisors (Board) adopted a CAP that identifies specific strategies and measures to reduce GHG emissions in the largely rural, unincorporated areas of San Diego County as well as County government operations (County of San Diego 2018). The CAP aims to meet the state's 2020 and 2030 GHG reduction targets (AB 32 and SB 375, respectively), and demonstrate progress towards the 2050 GHG reduction goal.

On September 30, 2020, the Board voted to set aside its approval of the County's 2018 CAP and related actions because the Final Supplemental Environmental Impact Report (2018 CAP SEIR) was found to be out of compliance with CEQA. In response to this Board action, the County is preparing a CAP Update to revise the 2018 CAP and correct the items identified by the 4th District Court of Appeal in San Diego within the Final 2018 CAP SEIR that were not compliant.

The County does not currently have locally adopted screening criteria or GHG thresholds. Pending adoption of a new CAP, appropriate GHG emissions thresholds were considered for purposes of this analysis. For the determination of the significance of the project's GHG emissions, the County has determined that current guidance provided by the Bay Area Air Quality Management District (BAAQMD). For land use development projects, the BAAQMD recommends using the approach endorsed by the California Supreme Court in *Center for Biological Diversity v. Department of Fish & Wildlife* (2015) (62 Cal.4th 204), which evaluates a project based on its effect on California's efforts to meet the state's long-term climate goals. As the Supreme Court held in that case, a project that would be consistent with meeting those goals can be found to have a less than significant impact on climate change under CEQA. If a project would contribute its "fair share" of what would be required to achieve those long-term climate goals, then a reviewing agency can find that the impact would not be significant because the project would help to solve the problem of global climate change (62 Cal.4th 220–223). If a land use project incorporates all of the design elements necessary for it to be carbon neutral by 2045, then it would contribute its portion of what is needed to achieve the state's climate goals and would help to solve the cumulative problem. It can therefore be found to make a less than cumulatively-considerable climate impact. Because this guidance supports how a project would contribute its "fair share" of the statewide long-term GHG reduction goals, it is not specific to the BAAQMD region and can also be applied in the San Diego region. BAAQMD's *Justification Report: CEQA Thresholds for Evaluating the Significance of Climate Impacts from Land Use Projects and Plan* (Justification Report), adopted April 2022, is provided in Appendix G. The information provided in the Justification Report is intended to provide the substantial evidence

that lead agencies need to support their determinations about significance using these thresholds.

The Justification Report analyzes what would be required of new land use development projects to achieve California's long-term climate goal of carbon neutrality by 2045. A new land use development project being built today needs to incorporate the following design elements to do its "fair share" of implementing the goal of carbon neutrality by 2045:

A) Projects must include, at a minimum, the following project design elements:
1) Buildings
a) The project will not include natural gas appliances or natural gas plumbing (in both residential and nonresidential development).
b) The project will not result in any wasteful, inefficient, or unnecessary energy usage as determined by the analysis required under CEQA Section 21100(b)(3) and Section 15126.2(b) of the State CEQA Guidelines.

2) Transportation
a) Achieve a reduction in project-generated VMT below the regional average consistent with the current version of the California Climate Change Scoping Plan (currently 15 percent) or meet a locally adopted SB 743 VMT target, reflecting the recommendations provided in the Governor's Office of Planning and Research's Technical Advisory on Evaluating Transportation Impacts in CEQA:
i. Residential projects: 15 percent below the existing VMT per capita
ii. Office projects: 15 percent below the existing VMT per employee
iii. Retail projects: no net increase in existing VMT
b) Achieve compliance with off-street electric vehicle requirements in the most recently adopted version of the California Green Building Standards (CALGreen) Tier 2.

With incorporation of the design features listed below, the Project would contribute its fair share to help the State meet carbon neutrality as codified in AB 1279 and would not hinder the County from meeting GHG reduction benchmarks. Therefore, applying BAAQMD significance thresholds, the Project would generate a less than significant GHG impact (see Appendix E).

Energy Use from Buildings
Energy use emissions are generated by activities within buildings that utilize electricity and natural gas as energy sources. GHGs are emitted during the generation of electricity from fossil fuels offsite in power plants. These emissions are considered indirect but are calculated in association with a building's overall operation. Natural gas usage emits GHGs directly when it is burned for space heating, cooking, hot water heating, and similar uses, whereas electricity usage emits GHGs indirectly to the extent that it is generated by burning carbon-based fuels. For the building sector to achieve carbon neutrality, natural gas usage would need to be phased out and replaced with electricity usage, and electrical generation would need to shift to 100 percent carbon-free sources. To support these shifts, new projects need to be built without natural gas and with no inefficient or wasteful energy usage.

The project would be all electric (i.e., designed without natural gas plumbing or natural gas appliances). The project would comply with the most current California Title 24 Part 6 Building

Energy Efficiency Standards, and Title 24 Part 11 CALGreen. In addition to standards to reduce the energy used by buildings, the Title 24, Part 6 Building Energy Efficiency Standards include the requirement for the project to install an onsite photovoltaic electricity generation system (e.g., solar panels) and the requirement to install a battery energy storage system, reducing the project's use of energy from the electrical grid. In addition, as discussed below, the project would result in a reduction of regional VMT-related transportation energy use. Therefore, the project would not result in wasteful, inefficient, or unnecessary energy usage.

Energy Use from Transportation
GHG emissions from vehicles come from the combustion of fossil fuels in vehicle engines. Decarbonization of the transportation infrastructure serving land use development would come from shifting the motor vehicle fleet to EVs, coupled with a shift to carbon-free electricity to power those vehicles. Land use projects cannot directly control whether and how fast these shifts are implemented, but they can, and do, have an important indirect influence on California's transition to a zero-carbon transportation system. The Justification Report states that "Motor vehicle transportation does not need to be eliminated entirely in order for the land use sector to achieve carbon neutrality, as carbon-free vehicle technology can be used (e.g., EVs powered by carbon-free electricity sources). But for that goal to be realistically implemented by 2045, California would need to reduce its per-capita VMT. How land use development is designed and sited can have a significant influence on how much VMT the project would generate." New land use development can influence transportation-related emissions in two areas related to how it is designed and built. First, new land use projects need to provide sufficient EV charging infrastructure to serve the needs of project users who would be driving EVs. Second, new land use projects can influence transportation related GHG emissions by reducing the amount of VMT associated with the project.

As described further in Section XVI(b), the project meets the CEQA VMT screening criteria for projects located in Infill Village Area and would not result in a significant VMT impact. Additionally, the project would serve its local community, which would reduce regional VMT by providing convenient storage solutions closer to people's homes than currently exist. In addition, a minimum of 8 of the project's 14 parking spaces would be EV capable spaces, and a minimum of 3 of those EV capable spaces would include electric vehicle supply equipment EVSE in accordance with the 2022 CALGreen nonresidential Tier 2 measure A5.106.5.3.2.

The project's "fair share" contribution towards the statewide goal of carbon neutrality by 2045, combined with the energy efficiency measures and the project's less than significant impact related to VMT, demonstrates that the project would not make a cumulatively considerable contribution to GHG emissions.

Therefore, the project would not generate GHG emissions, either directly or indirectly, that would have a significant impact on the environment, and impacts would be less than significant.

b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

☐ Potentially Significant Impact ☒ Less than Significant Impact

☐ Less Than Significant With Mitigation Incorporated ☐ No Impact

Discussion/Explanation:

Less Than Significant Impact: Executive Order (EO) S-3-05 and EO B-30-15 established GHG emission reduction targets for the state, and AB 32 launched the CARB Climate Change Scoping Plan that outlined the reduction measures needed to reach the 2020 target, which the state has achieved. As required by SB 32, CARB's 2017 Climate Change Scoping Plan outlines reduction measures needed to achieve the interim 2030 target. AB 1279, the California Climate Crisis Act, codified the carbon neutrality target as 85 percent below 1990 levels by 2045. The 2022 Scoping Plan was adopted in December 2022. The 2022 Scoping Plan lays out a path to achieve targets for carbon neutrality and reduce anthropogenic GHG emissions by 85 percent below 1990 levels no later than 2045, as directed by AB 1279. As detailed above, the project would provide its "fair share" contribution towards the statewide goal of carbon neutrality by 2045.

Furthermore, project emissions would decline beyond the buildout year of the project due to continued implementation of federal, state, and local reduction measures, such as increased federal and state vehicle efficiency standards, and SDG&E's increased renewable sources of energy in accordance with RPS goals. Based on currently available models and regulatory forecasting, project emissions would continue to decline through at least 2050. Given the reasonably anticipated decline in project emissions that would occur post-construction, the project is in line with the GHG reductions needed to achieve the 2045 GHG emission reduction targets identified by AB 1279.

As described further in Section XVI(b), the project meets the CEQA VMT screening criteria for projects located in Infill Village Area and would not result in a significant VMT impact. A reduction in regional VMT (and VMT-related GHG emissions) is a primary objective of the Regional Plan as the San Diego County RTP/SCS in accordance with the mandates of SB 375. Implementation of the RTP/SCS plans in the state's metropolitan areas to reduce VMT is a key component of the mobile source GHG emissions reduction policies and control measures in the CARB 2022 Scoping Plan. By implementing all-electric design and supplying EV charging infrastructure beyond minimum requirements, the project would contribute its "fair share" towards achieving California's post-2020 GHG reduction goals and zero carbon goals outlined in the CARB 2022 Scoping Plan. BAAQMD's performance standard based GHG threshold are consistent with the priority areas and related actions outlined in CARB's 2022 Scoping Plan Appendix D, *Local Actions*. Per the 2022 Scoping Plan Appendix D, local jurisdictions should focus on these three priority areas: transportation electrification, VMT reduction, and building decarbonization (CARB 2022b). By implementing the project design features required by the BAAQMD thresholds (no natural gas, no wasteful or inefficient use of energy, no net increase in VMT for local serving commercial buildings, and install EV charging infrastructure per CALGreen Tier 2), the project would be consistent with the 2022 Scoping Plan Appendix D guidance. In addition, the project would be consistent with the General Plan growth projections used in the development of the Regional Plan and in the development of GHG emissions inventories and projections used in the CARB 2022 Scoping Plan. Therefore, the project would be consistent with and would not obstruct the implementation of the SANDAG Regional Plan or the CARB 2022 Scoping Plan.

The County of San Diego's General Plan contains various goals, policies, and objectives related to the reduction of GHG emissions and global climate change. The project site is currently zoned as C36, Commercial and Office, and Urban Residential (RU) and has a General Plan land use designation of General Commercial and Village Residential 24. The project's proposed self-storage facility is an allowed use under the current zoning with the proposed Major Use Permit, and would not require a rezone or a General Plan amendment to change the land use designation. Therefore, the project would be consistent with the General Plan growth projections used in the development of the Regional Plan and in the development of GHG emissions inventories and projections used in the CARB 2022 Scoping Plan.

The project would not conflict with implementation of statewide GHG reduction goals, the 2022 Scoping Plan, San Diego Forward, or the County of San Diego General Plan. Therefore, the project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs, and impacts would be less than significant.

VIII. HAZARDS AND HAZARDOUS MATERIALS

Would the project:

a) Create a significant hazard to the public or the environment through the routine transport, storage, use, or disposal of hazardous materials or wastes or through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less than Significant Impact
☐ No Impact

Discussion/Explanation:

Less Than Significant Impact: The project would not create a significant hazard to the public or the environment because it does not propose the storage, use, transport, emission, or disposal of hazardous substances. The project would not result in a significant hazard to the public or environment because all storage, handling, transport, emission, and disposal of hazardous substances would be in full compliance with local, State, and Federal regulations. California Government Code § 65850.2 requires that no final certificate of occupancy or its substantial equivalent be issued unless there is verification that the owner or authorized agent has met, or is meeting, the applicable requirements of the Health and Safety Code, Division 20, Chapter 6.95, Article 2, §25500-25520.

The project does not propose to demolish any existing structures onsite and therefore would not create a hazard related to the release of asbestos, lead based paint or other hazardous materials from demolition activities.

Therefore, due to the strict requirements that regulate hazardous substances outlined above, and the fact that the initial planning, ongoing monitoring, and inspections would occur in compliance with local, State, and federal regulation, the project would not result in any potentially

significant impacts related to the routine transport, use, and disposal of hazardous substances or related to the accidental explosion or release of hazardous substances. Impacts would be less than significant.

b) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less than Significant Impact
☐ No Impact

Discussion/Explanation:

Less than Significant Impact: The project is located within 0.25 mile of several existing schools, including the Children's Choice Academy, Montessori East County Preschool & Infant Care, Lakeside Presbyterian Preschool, and Lemon Crest Elementary. However, as described in Section VIII(a), the project does not propose the use, handling, storage, transport, emission, or disposal of hazardous materials. Therefore, the project would not have a significant effect on an existing or proposed school.

c) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, or is otherwise known to have been subject to a release of hazardous substances and, as a result, would it create a significant hazard to the public or the environment?

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less than Significant Impact
☐ No Impact

Discussion/Explanation:

Less than Significant Impact: Based on a regulatory database search, the project site has not been subject to a release of hazardous substances that would create a significant hazard to the public or environment. One of the existing retail facilities adjacent to the project site, located at 12407 Woodside Avenue, is listed on the State Water Resources Control Board's (SWRCB's) Geotracker database associated with the release of dry cleaner solvent (SWRCB 2024). Cleanup has occurred and the site was closed in 1998 and no further action is required. In addition, the project site is within 2,000 feet of a property listed in the California Department of Toxic Substances Control's (DTSC's) Envirostor database. However, the listing has a cleanup status of No Action Required. Therefore, it is not considered a contaminated property and no precautions need to be taken by the proposed project as a result of this listing. Therefore, although properties in the vicinity of the project site are listed on the Geotracker and Envirostor databases, the project would not create a significant hazard to the public or the environment because all site remediation and clean up has occurred and would not contribute to a cumulatively considerable impact. Therefore, the project would not create a significant hazard to the public or environment, and impacts would be less than significant.

d) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☐ Less than Significant Impact
☒ No Impact

Discussion/Explanation:

No Impact: The proposed project is not located within an Airport Land Use Compatibility Plan (ALUCP), an Airport Influence Area, or a Federal Aviation Administration Height Notification Surface. Also, the project does not propose construction of any structure equal to or greater than 150 feet in height, constituting a safety hazard to aircraft and/or operations from an airport or heliport. Therefore, the project would not constitute a safety hazard for people residing or working in the project area.

e) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☐ Less than Significant Impact
☒ No Impact

Discussion/Explanation:

No Impact: The proposed project is not within one mile of a private airstrip. As a result, the project would not constitute a safety hazard for people residing or working in the project area.

f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less than Significant Impact
☐ No Impact

Discussion/Explanation:

The following sections summarize the project's consistency with applicable emergency response plans or emergency evacuation plans.

i. OPERATIONAL AREA EMERGENCY PLAN AND MULTI-JURISDICTIONAL HAZARD MITIGATION PLAN:

Less Than Significant Impact: The Operational Area Emergency Plan is a comprehensive emergency plan that defines responsibilities, establishes an emergency organization, defines lines of communications, and is designed to be part of the statewide Standardized Emergency

Management System. The Operational Area Emergency Plan provides guidance for emergency planning and requires subsequent plans to be established by each jurisdiction that has responsibilities in a disaster situation. The Multi-Jurisdictional Hazard Mitigation Plan includes an overview of the risk assessment process, identifies hazards present in the jurisdiction, hazard profiles, and vulnerability assessments. The plan also identifies goals, objectives and actions for each jurisdiction in the County of San Diego, including all cities and the County unincorporated areas. The project would not interfere with this plan because it would not prohibit subsequent plans from being established or prevent the goals and objectives of existing plans from being carried out.

ii. SAN DIEGO COUNTY NUCLEAR POWER STATION EMERGENCY RESPONSE PLAN

No Impact: The San Diego County Nuclear Power Station Emergency Response Plan would not be interfered with by the project due to the location of the project, plant, and the specific requirements of the plan. The emergency plan for the San Onofre Nuclear Generating Station includes an emergency planning zone within a 10-mile radius. All land area within 10 miles of the plant is not within the jurisdiction of the unincorporated County and as such, a project in the unincorporated area is not expected to interfere with any response or evacuation.

iii. OIL SPILL CONTINGENCY ELEMENT

No Impact: The Oil Spill Contingency Element would not be interfered with because the project is not located along the coastal zone or coastline.

iv. EMERGENCY WATER CONTINGENCIES ANNEX AND ENERGY SHORTAGE RESPONSE PLAN

No Impact: The Emergency Water Contingencies Annex and Energy Shortage Response Plan would not be interfered with because the project does not propose altering major water or energy supply infrastructure, such as the California Aqueduct.

v. DAM EVACUATION PLAN

Less Than Significant Impact: The project site is located within the dam inundation zone for the Chet Harritt Dam. The evacuation plans for these dams would not be interfered with because even though the project is located within a dam inundation zone, the project is not a unique institution that would be difficult to safely evaluate in the event of a dam failure. Unique institutions, as defined by the Office of Emergency Services, include hospitals, schools, skilled nursing facilities, retirement homes, mental health care facilities, care facilities for patients with disabilities, adult and childcare facilities, jails/detention facilities, stadiums, arenas, amphitheaters, or a similar use. Since the project does not propose a unique institution in a dam inundation zone, the project would not impair implementation of or physically interfere with the implementation of an emergency response plan.

g) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less than Significant Impact
☐ No Impact

Discussion/Explanation:

Less than Significant Impact: The project is not located in a moderate, high, or very high fire hazard severity zone as mapped by the California Department of Forestry and Fire (CAL FIRE). The proposed project is completely surrounded by urbanized areas and/or irrigated lands and no wildlands are adjacent to the project. Also, a Fire Service Availability Letter and conditions have been received from the Lakeside Fire Protection District, which indicates the expected emergency travel time to the project site to be 3 minutes. The Maximum Travel Time allowed pursuant to the Safety Element is 5 minutes. The Building Plan for the project is required to be reviewed and approved by the County Fire Authority and as such, would comply with regulations relating to emergency access, water supply, and defensible space specified in the County Fire Code and Consolidated Fire Code (see Section XX, Wildfire). Therefore, based on the location of the project; review of the project by County staff; and through compliance with the Lakeside Fire Protection District's conditions, the project is not expected to expose people or structures to a significant risk of loss, injury or death involving hazardous wildland fires. Moreover, the Project would not contribute to a cumulatively considerable impact, because all past, present and future projects in the surrounding area are required to comply with the Consolidated Fire Code.

h) Propose a use, or place residents adjacent to an existing or reasonably foreseeable use that would substantially increase current or future resident's exposure to vectors, including mosquitoes, rats or flies, which are capable of transmitting significant public health diseases or nuisances?

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☐ Less than Significant Impact
☒ No Impact

Discussion/Explanation:

No Impact: The project includes development of a self-storage facility. The project does not involve or support uses that allow water to stand for a period of 72 hours (3 days) or more (e.g., artificial lakes, agricultural irrigation ponds). Also, the project does not involve or support uses that would produce or collect animal waste, such as equestrian facilities, agricultural operations (e.g., chicken coops, dairies), solid waste facility, or other similar uses. Therefore, the project would not substantially increase current or future resident's exposure to vectors, including mosquitoes, rats, or flies.

IX. HYDROLOGY AND WATER QUALITY

Would the project:

a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less than Significant Impact
☐ No Impact

Discussion/Explanation: The following technical studies have been prepared for the project:

- PDP – SWQMP prepared by Omega Consulting Engineering, dated November 2023 (Appendix H).
- Drainage Study prepared by Omega Consulting Engineering, dated November 2023 (Appendix I).

The following responses have incorporated the analyses from these studies.

Less Than Significant Impact: Projects have the potential to generate pollutants during both the construction and post-construction phases. In order for the project to avoid potential violations of any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality, a PDP SWQMP and Drainage Study were prepared for the project.

A SWQMP was prepared by Omega Engineering Consultants (see Appendix H), consistent with the requirements of the County BMP Design Manual. The BMP Design Manual is a design manual for compliance with local County Watershed Protection Ordinance (Sections 67.801 et seq.) and regional Municipal Separate Storm Sewer Systems Permit (RWQCB San Diego Region Order No. R9-2013-0001, as amended by Order No. R9-2015-0001 and Order No. R9-2015-0100) requirements for storm water management. The SWQMP includes a list of required construction BMPs that would be implemented by the project. Such BMPs include, but would not be limited to, vegetation stabilization planting, bonded fixed matrix, fiber rolls, storm drain inlet protection, stabilized construction entrance, street sweeping, material delivery and storage, spill prevention and control, waste management concrete waste management, solid waste management, and sanitary waste management that would prevent soil erosion and loss of topsoil. The project would introduce landscaping in order to stabilize and preserve soils in the post-project condition.

In addition, the proposed project is required to obtain a National Pollution Discharge Elimination System (NPDES) General Permit for Discharges of Storm Water Associated with Construction Activities. Minimum required construction BMPs would include vegetation stabilization planting, fiber rolls (straw wattles), stabilized construction entrance, materials management, and waste management. Compliance with the required NPDES permit would reduce stormwater runoff from the project site by promoting infiltration, minimizing impervious surfaces, and require a no net increase in flows over the existing condition through hydromodification processes. In addition, the project would continue to implement existing pollution prevention measures, such as

pesticide control and proper trash and recycling disposal, in order to preserve water quality in the post-project condition. Therefore, the project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality, and impacts would be less than significant.

b) Is the project tributary to an already impaired water body, as listed on the Clean Water Act Section 303(d) list? If so, could the project result in an increase in any pollutant for which the water body is already impaired?

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less than Significant Impact
☐ No Impact

Discussion/Explanation:

Less Than Significant Impact: The project site is located within the Coches 907.14 Hydrologic Area of the San Diego Hydrologic Unit in the San Diego Region. The nearest impaired waterbody as listed on the Clean Water Act Section 303(d) list are Los Coches Creek (approximately 180 northwest of the project site) and the San Diego River (approximately 0.57 mile northwest of the project site).

According to the Drainage Study prepared for the project (Appendix I), drainage from the project site leaves the site as sheet flow and flows to the northwest where it comingles with the offsite flow of the existing developed plaza until it reaches the storm drain curb inlet on Woodside Avenue. Therefore, flow from the project site generally drains to the public storm drain system. Under proposed project conditions, runoff from the project site will generally drain to the same discharge points. For example, the northerly portion of the site would drain via gutter flow to the west, thence via sheet flow to the northwest until it reaches the storm drain curb inlet on Woodside Avenue. The entire proposed building would drain to a proposed lined biofiltration basin that will drain to a curb outlet on Cactus Street, thence confluence with the flow generated by Woodside Avenue and Cactus Street, and ultimately drain at the storm drain curb inlet on Woodside Avenue. The southerly drive aisle would drain via gutter and sheet flow to the west until it reaches a grated inlet at the low point of the existing development.

The SWQMP prepared for the project includes design measures and source control BMPs such that potential pollutants would be reduced to the maximum extent practicable so as not to increase the level of pollutants in receiving waters and reduce impacts on stormwater quality and hydromodification to less than significant levels during construction (e.g., vegetation stabilization planting, fiber rolls (straw wattles), stabilized construction entrance, materials and waste management, permeable surfaces, and biofiltration basins). The BMPs are consistent with the regional surface water and stormwater planning and permitting process that has been established to improve the overall water quality in County watersheds. As a result, the project would not contribute to a cumulative impact to an already impaired water body, as listed on the Clean Water Act Section 303(d). Regional surface water and stormwater permitting regulation for County of San Diego includes the following: RWQCB, San Diego Region Order No. R9-2013-0001 as amended by R9-2015-0001 and R9-2015-0100, San Diego Watershed Protection Ordinance (Sections 67.801 et seq.), and the County of San Diego BMP Design Manual. The

stated purposes of these ordinances are to protect the health, safety, and general welfare of the County of San Diego residents; to protect water resources and to improve water quality; to ensure the use of management practices by the County and its citizens that will reduce the adverse effects of polluted runoff discharges on waters of the state; to secure benefits from the use of stormwater as a resource; and to ensure the County is compliant with applicable state and federal laws. The Watershed Protection Ordinance has discharge prohibitions and requirements that vary depending on type of land use activity and location in the County. The project would be subject to the Watershed Protection Ordinance, which would require the preparation of a Stormwater Management Plan that details the project's pollutant discharge contribution to a given watershed and proposes BMPs or design measures to mitigate any impacts that may occur in the watershed.

Additionally, the SWQMP prepared for the project includes several long-term operational BMPs that would prevent degradation of surface or groundwater quality (e.g., prohibiting discharges to the storm drains, maintaining landscaping using minimal-to-no pesticides, dry sweeping the fueling area routinely, etc.). Therefore, construction and operational impacts to an impaired water body would be less than significant.

c) Could the proposed project cause or contribute to an exceedance of applicable surface or groundwater receiving water quality objectives or degradation of beneficial uses?

☐	Potentially Significant Impact	☒	Less than Significant Impact
☐	Less Than Significant With Mitigation Incorporated	☐	No Impact

Discussion/Explanation:

Less Than Significant Impact: The RWQCB has designated water quality objectives for waters of the San Diego Region to protect the existing and potential beneficial uses of each hydrologic unit. The project lies in the Coches 907.14 Hydrologic Area of the San Diego Hydrologic Unit that has the following existing beneficial uses for groundwater: municipal and domestic supply, agricultural supply, industrial service supply, and potentially for industrial process supply.

Potential sources of polluted runoff resulting from the project are discussed in the SWQMP prepared for the project. The following site design measures and/or source control BMPs and/or permanent post construction pollutant and hydromodification control BMPs would be employed to reduce potential pollutants in runoff to the maximum extent practicable, such that the project would not cause or contribute to an exceedance of applicable surface or groundwater receiving water quality objectives or degradation of beneficial uses: municipal and domestic supply, agricultural supply, industrial service supply, and potentially for industrial process supply.

In addition, the proposed BMPs are consistent with regional surface water, stormwater and groundwater planning and permitting process that has been established to improve the overall water quality in County watersheds. As a result, the project would not contribute to an exceedance of applicable surface or groundwater receiving water quality objectives or

degradation of beneficial uses. Refer to Section IX(b), for more information on regional surface water and stormwater planning and permitting process.

d) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less than Significant Impact
☐ No Impact

Discussion/Explanation:

Less than Significant Impact: The project would obtain its water supply from the Lakeside Water District, which obtains water from surface reservoirs and groundwater wells. The project would not use any groundwater for any purpose, including irrigation, domestic or commercial demands. The project would result in an incremental increase in impervious surfaces, which would not interfere with regional groundwater recharge, and would include landscaping bordering the paved surfaces, which would allow for infiltration. In addition, the project does not involve operations that would interfere substantially with groundwater recharge such as regional diversion of water to another groundwater basin; or diversion or channelization of a stream course or waterway with impervious layers, such as concrete lining or culverts, for substantial distances (e.g., 0.25 mile). These activities and operations can substantially affect rates of groundwater recharge. Furthermore, the project incorporates required stormwater BMPs in the form of impervious diversion and tree wells that would ensure water infiltration continues to occur, supporting the underlying groundwater basin. Therefore, no impact to groundwater resources or groundwater management is anticipated.

e) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or through the addition of impervious surfaces, in a manner which would:

(i) result in substantial erosion or siltration on- or off-site;

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less than Significant Impact
☐ No Impact

Discussion/Explanation:

Less Than Significant Impact: The project site is currently a vacant lot located at the southeasterly corner of a commercial development plaza. As described in Section IX(b), the northerly portion of the site drains via sheet flow to the northwest direction and comingles with the offsite flow of the existing developed plaza until it ultimately reaches the storm drain inlet on Woodside Avenue. The offsite flow generated by Woodside Avenue and Cactus Street confluences with the flow of the entire plaza at the existing curb inlet on Woodside Avenue. This point is referred to as discharge point 1. The southerly drive aisle drains via sheet flow to the

west until it reaches a grated inlet at the low point of the existing development. This point is referred to as discharge point 2.

Post construction, the project would modify onsite drainage patterns, but the discharge points would remain the same. The northerly portion of the site would drain via gutter flow to the west, thence via sheet flow to the northwest until it reaches the storm drain curb inlet on Woodside Avenue. The rooftop drainage would be directed downward and would drain to a proposed lined biofiltration basin that would drain to a curb outlet on Cactus Street, confluence with the flow generated by Woodside Avenue and Cactus Street, and ultimately drain at the storm drain curb inlet on Woodside Avenue. The southerly drive aisle would drain via gutter and sheet flow to the west until it reaches a grated inlet at the low point of the existing development. Post construction, the project proposes a diversion of flow by draining to the gutter on Cactus Street, whereas in the existing conditions the site drains to the northwest direction towards the existing development and ultimately drains to the public storm drain system on Woodside Avenue. Hydraulic calculations for the street gutter capacity on Cactus Street and Woodside Avenue demonstrate that the additional flow discharged on Cactus and Woodside Avenue would not over-capacitate the street gutter. According to the Drainage Study, the proposed improvements would result in a decrease of generated runoff during the peak of the 100-year, 6-hour storm (Appendix I).

The SWQMP specifies and describes the implementation process of all required BMPs that would address equipment operation and materials management, prevent the erosion process from occurring, and prevent sedimentation in any on-site and downstream drainage swales (Appendix H). BMPs would be implemented consistent with the requirements of the County BMP Design Manual during construction to control storm flows and introduce landscaping in order to preserve soils in the post-project condition. Post-construction, site drainage would remain the same. Therefore, the project would not substantially alter the existing drainage pattern in a manner that would result in substantial erosion or siltation on- or off-site, and impacts would be less than significant. In addition, because erosion and sedimentation would be controlled within the boundaries of the project site, the project would not contribute to a cumulatively considerable impact. For further information on soil erosion, refer to Section VII(b).

(ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;

☐	Potentially Significant Impact	☐	Less than Significant Impact
☐	Less Than Significant With Mitigation Incorporated	☒	No Impact

Discussion/Explanation:

Less Than Significant Impact: As described in Section X(e)(i) above, the project would modify onsite drainage patterns, but the discharge points would remain the same post construction. The proposed improvements would result in a decrease of generated runoff during the peak of the 100-year, 6-hour storm. Additionally, required BMPs would be implemented consistent with the requirements of the County BMP Design Manual during construction to control storm flows. Therefore, the project would not substantially alter the existing drainage pattern in a manner that

would substantially increase the rate or amount of surface runoff which would result in flooding on or off site, and impacts would be less than significant.

Moreover, the project would not contribute to a cumulatively considerable alteration or a drainage pattern or increase in the rate or amount of runoff, because the project would not substantially increase water surface elevation or runoff exiting the site, as detailed above. Projects listed in Section XXI(b) would be subject to federal, state, and local regulations, including the NPDES permit, that are designed to reduce stormwater runoff from project sites by promoting infiltration, minimizing impervious surfaces, and requiring a no-net increase in flows over the existing condition through hydromodification processes. Any short-term impacts resulting from alterations of drainage and hydrology resulting in substantial erosion or siltation on- or off-site would be minimized with the incorporation of required construction BMPs and operational compliance with the San Diego Municipal Separate Storm Sewer Systems (MS4) Permit. Therefore, the project's contribution would not be cumulatively considerable.

(iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☐ Less than Significant Impact
☒ No Impact

Discussion/Explanation:

Less than Significant Impact: The Project would implement construction and operational BMPs to protect water quality as established in the SWQMP prepared for the project and would have a less than significant impact with regard to additional sources of polluted runoff. As described in Section X(e)(i) above, the project would modify onsite drainage patterns, but the discharge points would remain the same post construction. The proposed improvements would result in a decrease of generated runoff during the peak of the 100-year, 6-hour storm. In addition, the diversion of flow to Cactus Street and Woodside Avenue would not over-capacitate the gutter, curb inlet, and the existing storm drain system. Therefore, the project would not substantially alter the existing drainage pattern in a manner that would substantially increase the rate or amount of surface runoff, which would exceed the capacity of the existing or planned storm drain system conveyances, and impacts would be less than significant.

(iv) impede or redirect flood flows?

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less than Significant Impact
☐ No Impact

Discussion/Explanation:

Less than Significant Impact: Refer to Section IX(e)(i) through (iii). The Drainage Study prepared for the project (Appendix I) demonstrates that the project would not impede or redirect

flood flows. Therefore, the project would not impede or redirect flows, and impacts would be less than significant.

f) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less than Significant Impact
☐ No Impact

Discussion/Explanation:

Less than Significant Impact: The project is not located within a Federal Emergency Management Agency (FEMA) special flood zone. The project site is located more than 20 miles from the coast; therefore, in the event of a tsunami, the project site would not be inundated. Likewise, given that the project site is not located near a large standing body of water, inundation by seiche (or standing wave) is considered negligible. The project site is relatively flat with no steep slopes and does not contain slopes subject to mudflows; therefore, potential impacts related to release of pollutants due to inundation are determined to be less than significant. In addition, the project would not create a significant hazard to the public or the environment through the routine transport, storage, use, or disposal of hazardous materials or wastes or through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. Overall, the project would not result in flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation, and impacts would be less than significant.

g) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less than Significant Impact
☐ No Impact

Discussion/Explanation:

Less Than Significant Impact: As described in Section IX(a) above, the project would implement required BMPs consistent with the requirements of the County BMP Design Manual during construction to preserve water quality. These measures would slow runoff from the project site and control erosion and sedimentation and satisfy waste discharge requirements. The SWQMP (see Appendix H) specifies and describes the implementation process of all BMPs that would address equipment operation and materials management, prevent the erosion process from occurring, and prevent sedimentation in any on-site and downstream drainage swales. The proposed BMPs are consistent with regional surface water, storm water and groundwater planning and permitting process that has been established to improve the overall water quality in County watersheds and would ensure that the project is consistent with the Water Quality Control Plan for the San Diego Basin. The project site would be in compliance with the San Diego Basin Water Quality Control Plan and is not located within a County Sustainable

Groundwater Management Act or Groundwater Sustainability Plan basin area. See Section IX(a) through (d). Therefore, the project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan, and impacts would be less than significant.

X. LAND USE AND PLANNING

Would the project:

a) Physically divide an established community?

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less than Significant Impact
☐ No Impact

Discussion/Explanation:

Less than Significant Impact: The project would include a self-storage facility with associated parking and loading spaces and a leasing office. The project would provide access from existing roadways and would not include any features that could physically divide an established community. The project would not require the introduction of new infrastructure, such as major roadways or water supply systems, or utilities to the area. Therefore, the project would not disrupt or divide an established community, and impacts would be less than significant.

b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less than Significant Impact
☐ No Impact

Discussion/Explanation:

Less Than Significant Impact: The project site is subject to the General Plan Village Regional Category and contains lands within the Village Residential 24 (VR-24) Land Use Designation and General Commercial Land Use Designation. The project is also subject to the policies of the Lakeside Community Plan. The property is zoned C36/RU, which permits self-storage facilities with a Major Use Permit pursuant to the Zoning Ordinance Section 2185.c. Therefore, the project would not conflict with applicable land use plans, policies, or regulations, and impacts would be less than significant.

XI. MINERAL RESOURCES

Would the project:

a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less than Significant Impact
☐ No Impact

Discussion/Explanation:

Less Than Significant Impact: The lands within the project site have not been classified by the California Department of Conservation – Division of Mines and Geology (Update of Mineral Land Classification: Aggregate Materials in the Western San Diego Production-Consumption Region, 1997.

The project site is surrounded by densely developed land uses including residential, commercial, and religious assembly uses which are incompatible to future extraction of mineral resources on the project site. A future mining operation at the project site would likely create a significant impact to neighboring properties for issues such as noise, air quality, traffic, and possibly other impacts. The mineral resources potentially located within the project site can be considered lost due to incompatible land uses and the infeasibility of a mining operation on the project site. Therefore, implementation of the project would not result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state.

b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less than Significant Impact
☐ No Impact

Discussion/Explanation:

Less Than Significant Impact: The project site is not located in an area that is within 1,300 feet of MRZ-2 designated lands. The proposed project would not result in the loss of locally important mineral resources because the project site is currently surrounded by densely developed land uses including residential, commercial, and civic uses including religious assembly, which are incompatible to future extraction of mineral resources on the project site. The placement of the proposed self-storage facility on the project site would not result in a loss of mineral resources because the feasibility of future mining at the site is already impacted by existing land use incompatibilities. Based on current land use conditions, a future mining operation at the project site would likely create a significant impact to neighboring properties for issues such as noise, air quality, traffic, and other impacts, thereby reducing the feasibility of future mining operations occurring, regardless of the proposed project.

Therefore, no potentially significant loss of availability of a known mineral resource of locally important mineral resource recovery (extraction) site delineated on a local general plan, specific plan, or other land use plan would occur as a result of the proposed project.

XII. NOISE

Would the project result in:

a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less than Significant Impact
☐ No Impact

Discussion/Explanation: An Acoustical Analysis Report was prepared by Helix Environmental for the project, dated August 2023 (Appendix J). The responses below have incorporated the analysis from the report.

The County of San Diego General Plan Noise Element, Tables N-1 and N-2 addresses noise sensitive areas and requires an acoustical study to be prepared for any use that may expose noise sensitive areas to noise in excess of a Community Noise Equivalent Level (CNEL) of 60 A-weighted decibels (dBA). Moreover, if the project is in excess of 60 dBA Community Noise Equivalent Level (CNEL) or 65 dBA CNEL, modifications must be made to the project to reduce noise levels. Noise sensitive areas include residences, hospitals, schools, libraries, or similar facilities as mentioned within Tables N-1 and N-2. Noise sensitive land uses (NSLU) exist in proximity to the project site.

The project is also subject to the County Noise Ordinance which regulates temporary construction noise associated with the project, Sections 36.408 and 36.409. Section 36.409 of the County Noise Ordinance states that construction noise shall not exceed 75 dBA at the property line during an 8-hour period between 7 a.m. to 7 p.m. It is unlawful to operate construction equipment between 7 p.m. and 7 a.m. and no work shall be done on Sundays and Holidays, per Section 36.408.

Less than Significant Impact: The project includes development of a self-storage facility. The project would be consistent with the County of San Diego General Plan, Noise Ordinance, and other applicable noise standards:

Construction Noise
As addressed in the Acoustical Analysis Report, noise associated with project construction would potentially result in short-term impacts to surrounding properties. Project construction would require site preparation and clearing, demolition of old concrete and asphalt, grading/excavation, installation of underground utilities, physical building construction, paving, and architectural coating. These construction activities would generate elevated noise levels that could be audible to the residential noise sensitive land uses (NSLU) east and south of the project site. The magnitude of the impact would depend on the type of construction activity, equipment used, duration of each construction phase, distance between the noise source and receiver(s), and any intervening structures. Construction equipment would not all operate at the same time or location. Furthermore, construction equipment would not be in constant use during the 8-hour

operating day. Project construction work and mobile equipment operation would occur throughout the project site; therefore, for noise analysis purposes, mobile construction equipment was modeled at the center of the project site, at an approximate distance of 170 feet from the closest NSLU east of the project across Cactus Street. This distance represents the assumed average distance from the NSLU that construction equipment would be operating over the course of a workday.

The loudest combination of equipment anticipated to be used simultaneously for each of these construction activities and the resultant noise levels at the applicable distances are shown in Table 5, Construction Noise Levels.

Table 5 Construction Noise Levels

Activity	Simultaneous Construction Equipment	Average Distance to Nearest NSLU (feet)	Noise Levels (dBA L_{eq})
Demolition	Backhoe Mounted Jackhammer	170	72.7
Site Preparation	Skid Steer Loader	170	63.0
Grading/Excavating	Excavator, Skid Steer Loader	170	67.8
Underground Utilities	Backhoe	170	63.0
Building Construction	Crane, Aerial Lift	170	63.2
Paving	Paver, Roller, Skid Steer Roller	170	67.8

Source: see Appendix J.
Notes: NSLU=noise sensitive land use; dBA=A-weighted decibels; L_{eq}=time averaged sound pressure level.

As shown in Table 5, construction noise levels are not anticipated to exceed 75 dBA L_{eq} (equivalent noise level) at the nearest NSLU. As construction activities associated with the project would comply with noise level limits from the County's Noise Ordinance, temporary increases in noise levels from construction activities would be less than significant at the adjacent residential uses. Therefore, project construction would not exceed noise level limits established in the County's Noise Ordinance, and temporary increases in noise levels during construction would be less than significant.

In addition, construction of the project would add up to 21 peak hour worker trips (cars and pickup trucks) and up to 9 hourly haul truck trips. Temporary construction traffic noise would be significant if it results in a doubling of existing traffic noise, a just detectable 3 dBA increase in typical noisy outdoor environments. The Acoustical Analysis Report determined that the addition of 21 cars and 9 heavy trucks to the peak hour traffic on Cactus Street would result in an increase of 1.0 dBA, less than the standard of a 3 dBA increase. Therefore, project off-site construction traffic noise combined with existing traffic noise would not exceed the outdoor detectable level of a 3 dBA increase. Construction noise impacts would be less than significant.

Operational Noise
The proposed project would include commercial-sized HVAC units mounted on the project building roof. HVAC noise levels were modeled using CadnaA, assuming continuous operation of all project HVAC systems. Receivers were placed in the model five feet above the first floor and second floor balcony/window heights for the two closest apartment buildings south of the project site, and five feet above the ground at the residential property line (i.e., front yard) of the two closest single-family residences east of the project site. In addition, receivers were placed

five feet above ground level at the south and west project property line adjacent to the project building. Because existing ambient traffic noise in the project vicinity is above 49 CNEL, the applicable County noise standard for noise generated on the project site and received by an off-site NSLU is 60 CNEL. The standard for noise measured at the project property line is 55 dBA LEQ between 10:00 p.m. and 7:00 a.m. The results of the HVAC modeling are compared to the County standard in Table 6, HVAC Noise.

Table 6 Operational Noise Levels

Receiver	Project HVAC Noise (dBA LEQ)[1]	County Noise Limit[2]	Exceed Standard?
R1 First Floor	41.3	60 CNEL	No
R1 Second Floor	44.4	60 CNEL	No
R2 First Floor	41.9	60 CNEL	No
R2 Second Floor	42.9	60 CNEL	No
R3 First Floor	42.2	60 CNEL	No
R3 Second Floor	43.6	60 CNEL	No
R4 Front Yard	40.5	60 CNEL	No
R5 Back Yard	40.8	60 CNEL	No
East Property Line	40.7	55 dBA Leq	No
West Property Line	39.6	55 dBA Leq	No

Source: see Appendix J.
[1] HVAC systems assumed to operated continuously.
[2] More restrictive nighttime property line standard applied.

As shown in Table 6, noise from the project HVAC systems would not exceed the County noise Standards established in the General Plan Noise Element. Impacts would be less than significant.

The project would add trips to existing and future traffic on surrounding streets. Off-site traffic noise levels were modeled and presented in the Acoustical Analysis Report (Appendix J). The project's contribution to area traffic noise would be significant if the project would result in a 3 dBA increase in noise levels. According to the Acoustical Analysis Report, the maximum increase in traffic noise because of the project would be 0.3 dBA and would not exceed the standard of a 3 dBA increase.

Therefore, operation of the project would not result in a permanent ambient noise increase exceeding County standards, and the impact would be less than significant.

b) Generation of excessive groundborne vibration or groundborne noise levels?

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less than Significant Impact
☐ No Impact

Discussion/Explanation:

Less than Significant Impact: The operation of construction equipment generates vibrations that propagate though the ground and diminish in intensity with distance from the source.

Vibration impacts can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibration at moderate levels, to slight damage of buildings at the highest levels. The most prominent source of vibration anticipated during general project construction activities would be a vibratory roller used for soil and/or pavement compaction. A vibratory roller could be used as close as 65 feet from the closest off-site residential structure to the east. According to the California Department of Transportation (Caltrans) *Transportation and Construction Vibration Guidance Manual*, a vibratory roller creates a peak particle velocity (PPV) of 0.210 inch per second (in/sec) at 25 feet (Caltrans 2020). At a distance of 65 feet, a vibratory roller would create a PPV of 0.07 in/sec (Appendix J). This would be less than what is considered a "distinctly perceptible" level for humans of 0.035 in/sec PPV; therefore, construction goundborne vibration impacts would be less than significant.

In addition, the project does not propose any of the following land uses that can be impacted by groundborne vibration or groundborne noise levels.

1. Buildings where low ambient vibration is essential for interior operation, including research and manufacturing facilities with special vibration constraints.
2. Residences and buildings where people normally sleep including hotels, hospitals, residences and where low ambient vibration is preferred.
3. Civic and institutional land uses including schools, churches, libraries, other institutions, and quiet office where low ambient vibration is preferred.
4. Concert halls for symphonies or other special use facilities where low ambient vibration is preferred.

Finally, the project does not propose any major, new or expanded infrastructure such as mass transit, highways or major roadways, or intensive extractive industry that could generate excessive groundborne vibration or groundborne noise levels on-site or in the surrounding area. Therefore, the project would not expose persons to or generate excessive groundborne vibration or groundborne noise levels on a project or cumulative level.

c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☐ Less than Significant Impact
☒ No Impact

Discussion/Explanation:

No Impact: The proposed project is not located within an Airport Influence Area, Airport Safety Zone, Avigation Easement, Overflight area, or a Federal Aviation Administration Height Notification Surface area for airports or within 2 miles of a public airport or public use airport. Therefore, the project would not expose people residing or working in the project area to excessive airport-related noise levels.

XIII. POPULATION AND HOUSING

Would the project:

a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☐ Less than Significant Impact
☒ No Impact

Discussion/Explanation:

No Impact: The project proposes to develop a self-storage facility with associated office space. The proposed project would not induce substantial population growth in an area because the project does not propose any physical or regulatory change that would remove a restriction to or encourage population growth in an area including, but not limited to the following: new or extended infrastructure or public facilities; large-scale residential development; accelerated conversion of homes to commercial or multi-family use; or regulatory changes including General Plan amendments, specific plan amendments, zone reclassifications, sewer or water annexations; or LAFCO annexation actions. No impact would occur.

b)Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☐ Less than Significant Impact
☒ No Impact

Discussion/Explanation:

No Impact: The project site is currently vacant and undeveloped. Therefore, the proposed project would not displace substantial numbers of existing people or housing. No impact would occur.

XIV. PUBLIC SERVICES

Would the project:

a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance service ratios, response times or other performance objectives for any of the public services:
   i. Fire protection?

ii. Police protection?
iii. Schools?
iv. Parks?
v. Other public facilities?

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less than Significant Impact
☐ No Impact

Discussion/Explanation:

a.i. Less than Significant Impact. The Lakeside Fire Protection District would be responsible for providing fire and emergency medical services to the project site. The Lakeside Fire Station 2 is approximately 1 mile (driving distance) from the project site at 12216 Lakeside Avenue. Based on the service availability form received from the Lakeside Fire Protection District (Appendix K), the project would not require new fire protection facilities to serve the project that could result in physical impacts. The expected emergency travel time to the project site is 3 minutes.

The project does not include residential units or other growth-inducing elements that would substantially increase the demand for fire protection and emergency medical services. Further, the project would be designed and constructed consistent with applicable codes and standards for access and fire suppression infrastructure. The project would not require the construction of a new fire station to maintain service ratios within the service area served by Lakeside Fire Protection District. Therefore, the project would not result in the need for new or altered fire protection facilities, and impacts would be less than significant.

a.ii. Less than Significant Impact. The project site is served by the San Diego County Sheriff's Department. The closest sheriff's station to the project site, the Lakeside Sub Station, is at 12365 Parkside Street, approximately 0.12 miles from the project site. The project does not propose uses that typically generate a demand for police protection services, such as residential development. Limited police protection may be required during project operation if theft or vandalism were to occur; however, these types of events would not affect police protection response times or substantially increase demand. The project is consistent with the land use designation for the site and would not increase the population beyond what was anticipated in the General Plan. The construction of new police facilities and expansion of existing facilities would not be required to serve the project. Impacts would be less than significant.

a.iii. No Impact. The project would consist of a self-storage facility and would not generate new students. Therefore, the project would not result in the need for new or altered school facilities, and impacts would be less than significant.

a.iv. No Impact. The project would consist of a self-storage facility and would not directly generate a substantial new population requiring new park facilities (see Section XV, Recreation). Therefore, the project would not generate a need for construction or expansion of recreational facilities and no impact would occur.

a.v. No Impact. The project would develop a self-storage facility that would not generate a substantial new population to utilize libraries or other public facilities. Therefore, impacts regarding libraries or other public facilities would not occur.

XV. RECREATION

Would the project:

a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☐ Less than Significant Impact
☒ No Impact

Discussion/Explanation:

No Impact: The project proposes to develop a self-storage facility with associated office space. The project would not include any residential uses or otherwise increase the use of existing neighborhood and regional parks or other recreational facilities in the vicinity. Therefore, no impacts to recreational facilities would occur.

b) Include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☐ Less than Significant Impact
☒ No Impact

Discussion/Explanation:

No Impact: The project does not include recreational facilities or require the construction or expansion of recreational facilities. Therefore, the construction or expansion of recreational facilities cannot have an adverse physical effect on the environment.

XVI. TRANSPORTATION AND TRAFFIC

Would the project:

a) Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

☐ Potentially Significant Impact
☒ Less Than Significant With Mitigation Incorporated
☐ Less than Significant Impact
☐ No Impact

Discussion/Explanation: The County of San Diego Guidelines for Determining Significance for Traffic and Transportation (Guidelines) establish measures of effectiveness for the performance of the circulation system. These Guidelines incorporate standards from the County of San Diego Public Road Standards and Mobility Element, the County of San Diego Transportation Impact Fee Program and the Congestion Management Program.

Less Than Significant Impact: The project includes development of a self-storage facility. The project would not have a direct impact related to a conflict with any plans, ordinances, or policies addressing the circulation system. Project trips, or average daily trips (ADTs), associated with construction is estimated to include less than 100 ADT for workers. Given that construction worker trips would be temporary and would be dispersed along different routes based on the origin of the trips, construction worker commuting is not expected to have a significant effect on the capacity of the transportation system.

Operationally, the project is calculated to generate 204 ADT with 12 AM peak hour trips and 19 PM peak hour trips. The project would not generate substantial vehicle trips to the project site (see Section XVII[b] below). The project would not conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including public transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and public transit.

The project would not have a significant impact related to a conflict with any performance measures establishing measures of effectiveness of the circulation system because the project trips do not exceed any of the County's Guidelines for Determining Significance for Impacts related to Traffic and Transportation. As identified in the County's Guidelines for Determining Significance for Traffic and Transportation, the project trips would not result in a substantial increase in the number of vehicle trips, volume of capacity ratio on roads, or congestion at intersections in relation to existing conditions from the construction activities. In addition, the project would not conflict with policies related to non-motorized travel such as mass transit, pedestrian or bicycle facilities. Therefore, the project would not conflict with policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities.

b) Conflict or be consistent with CEQA Guidelines Section 15064.3, subdivision?

☐	Potentially Significant Impact	☒	Less than Significant Impact
☐	Less Than Significant With Mitigation Incorporated	☐	No Impact

Discussion/Explanation: Per CEQA Guidelines Section 15064.3, *Determining the Significance of Transportation Impacts*, land use projects should be evaluated based on vehicle miles traveled (VMT). In accordance with the County's Draft 2022 Transportation Study Guidelines, the requirements to prepare a detailed transportation VMT analysis apply to all land development projects, except those that meet at least one of the screening criteria. A project that meets at

least one of the screening criteria below would have a less than significant VMT impact due to project characteristics and/or location:

1. Projects Located in a VMT Efficient Area
2. Projects located in Infill Village Area (in Transit Opportunity Areas and Outside of High/Very High Fire Severity Areas)
3. Small Residential and Employment Projects
4. Locally Serving Retail Projects
5. Locally Serving Public Facilities
6. Redevelopment Projects with Lower Total VMT
7. Affordable Housing

The project meets the screening criterion 2 (Projects located in Infill Village Area [in Transit Opportunity Areas and Outside of High/Very High Fire Severity Areas]), as described in further detail below.

Less than Significant Impact: CEQA Section 15064.3, *Determining the Significance of Transportation Impacts*, states that for many projects, a qualitative analysis of construction traffic may be appropriate. Since construction traffic is temporary and workers are either travelling to the project jobsite or another jobsite elsewhere, the impact on VMT is considered less than significant.

Given that operation of the proposed project is expected to generate 204 ADT, a Local Mobility Analysis is not required to be prepared for the project, pursuant to the County's adopted Transportation Study Guidelines.

An Infill development is defined by the Governor's Office of Planning and Research (OPR) as "…building within unused and underutilized lands within existing development patterns, typically but not exclusively within urban areas." Multiple land use and transportation network variables were identified to create a quantitative definition for "infill development" in the County, including household density, intersection density, and job accessibility.

Pursuant to the County's adopted Transportation Study Guidelines, the project meets the CEQA VMT screening criteria for projects located in Infill Village Area and will not result in a significant VMT impact. Additionally, the project would serve its local community with self-storage and RV parking, which would reduce regional VMT by providing convenient storage solutions closer to people's homes than currently exist. The nature of the use is intended to serve density in existing travel patterns associated with developed communities. The project requires a minimal number of employees to operate the use and their commutes will occur outside of typical commute hours. Therefore, this project would be consistent with CEQA Guidelines Section 15064.3, subdivision (b), and impacts would be less than significant.

c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

☐	Potentially Significant Impact	☒	Less than Significant Impact
☐	Less Than Significant With Mitigation Incorporated	☐	No Impact

Discussion/Explanation:

Less Than Significant Impact: The project would not substantially increase driving hazards due to a geometric design feature or incompatible uses. The project would develop a self-storage facility. The project includes sidewalk improvements along the project frontage on Cactus Street. All road improvements would be constructed according to the County's Public and Private Road Standards. Additionally, realignment of the neighbor's driveway as part of the project would avoid conflicts with the proposed project driveway. Therefore, the project would not significantly increase hazards due to design features or incompatible uses, and impacts would be less than significant.

d) Result in inadequate emergency access?

☐ Potentially Significant Impact	☒ Less than Significant Impact
☐ Less Than Significant With Mitigation Incorporated	☐ No Impact

Discussion/Explanation:

Less Than Significant Impact: The Lakeside Fire Protection District, which is the Fire Authority Having Jurisdiction, and the San Diego County Fire Authority, have reviewed the proposed project and associated emergency access roadways and have determined that there is adequate emergency fire access proposed. Access to the project site would be provided via the existing 28-foot access driveway off of Cactus Street. Therefore, the proposed project would not result in inadequate emergency access.

XVII. TRIBAL CULTURAL RESOURCES

Would the project:

a) Cause a substantial adverse change in the significance of a tribal cultural resource, as defined in Public Resources Code §21074 as either a site, feature, place, or cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of Historical Resources as defined in Public Resources Code §5020.1(k), or

☐ Potentially Significant Impact	☐ Less than Significant Impact
☐ Less Than Significant With Mitigation Incorporated	☒ No Impact

ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code §5024.1. In applying the criteria set forth in subdivision (c) of

Public Resources Code §5024.1, the Lead Agency shall consider the significance of the resource to a California Native American tribe.

☐ Potentially Significant Impact
☒ Less Than Significant With Mitigation Incorporated
☐ Less than Significant Impact
☐ No Impact

Discussion/Explanation:

Less than Significant with Mitigation Incorporated: No Sacred Lands were identified by the Native American Heritage Commission (NAHC). County staff contacted the Native American groups and individuals provided by the NAHC to further investigate whether they have knowledge of Sacred Lands occurring on the subject parcels. No response was received. The project site is in a sensitive area and may contain intact subsurface cultural resources deposits. Impacts related to disturbance of tribal cultural resources during project construction would be potentially significant. Implementation of Mitigation Measures CUL-1 and CUL-2 require monitoring by both a qualified archeologist and Kumeyaay Native American Monitor during construction. Implementation of these mitigation measures would reduce potentially significant impacts to below a level of significance.

XVIII. UTILITIES AND SERVICE SYSTEMS

Would the project:

a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effect?

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less than Significant Impact
☐ No Impact

Discussion/Explanation:

Less Than Significant Impact:

Water
The project would connect to the existing Lakeside Water District water line within the existing access road for water supply. All pipeline improvements and connections are evaluated as part of the project footprint. Consequently, potential impacts associated with construction of these water service connections have been evaluated throughout this IS/MND. Therefore, the project would not require or result in the relocation or construction of new or expanded water facilities that would cause environmental effects, and impacts would be less than significant.

Wastewater

The project would construct a new sewer line that would connect to an existing County of San Diego Sanitation District sewer line in the existing access road. Consequently, potential impacts associated with construction of these wastewater facilities have been evaluated throughout this IS/MND. Therefore, the project would not require or result in the relocation or construction of new or expanded wastewater facilities that would cause environmental effects, and impacts would be less than significant.

Stormwater
Stormwater runoff from new impervious areas constructed for the project would be treated via impervious area dispersion in compliance with the County's BMP Design Manual. Runoff from the buildings and parking lots would be directed towards the proposed biofiltration basin. No changes in the current drainage patterns are proposed. Design features that would direct flows towards adjacent pervious areas would be located within the project footprint. Consequently, potential impacts associated with drainage features have been evaluated throughout this IS/MND (refer to Section IX, Hydrology and Water Quality). Therefore, the project would not require or result in the relocation or construction of new or expanded stormwater facilities that would cause environmental effects, and impacts would be less than significant.

Natural Gas
The project would not include natural gas appliances or natural gas plumbing; therefore, the project would not require or result in the relocation or construction of new or expanded natural gas facilities that would cause environmental effects, and no impacts would occur.

Electric Power and Telecommunications
The project would connect to electrical and fiber optic infrastructure that already serves the project site. Connections to this infrastructure would be located within the project footprint. Consequently, potential impacts associated with these infrastructure connections have been evaluated throughout this IS/MND. Therefore, the project would not require or result in the relocation or construction of new or expanded electric power or telecommunications facilities, and impacts would be less than significant.

b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

☐ Potentially Significant Impact	☒ Less than Significant Impact
☐ Less Than Significant With Mitigation Incorporated	☐ No Impact

Discussion/Explanation:

Less Than Significant Impact: The project requires water service from the Lakeside Water District. According to the service availability form provided by the Lakeside Water District (Appendix L), the District has adequate water resources and entitlements to serve the project. Therefore, the project would have sufficient water supplies and impacts would be less than significant.

c) Result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less than Significant Impact
☐ No Impact

Discussion/Explanation:

Less Than Significant Impact: The project requires wastewater service from the County Sanitation District. The County Sanitation District has indicated adequate capacity is available to serve the project. Therefore, impacts would be less than significant.

d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less than Significant Impact
☐ No Impact

Discussion/Explanation:

Less Than Significant Impact: Implementation of the project would generate limited solid waste. All solid waste facilities, including landfills require solid waste facility permits to operate. In the County, the County Department of Environmental Health, Local Enforcement Agency issues solid waste facility permits with concurrence from the CalRecycle under the authority of the Public Resources Code (Sections 44001-44018) and California Code of Regulations Title 27, Division 2, Subdivision 1, Chapter 4 (Section 21440et seq.). There are five permitted active landfills in the County with remaining capacity. Therefore, there is sufficient existing permitted solid waste capacity to accommodate the project's solid waste disposal needs, and impacts would be less than significant.

e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less than Significant Impact
☐ No Impact

Discussion/Explanation:

Less Than Significant Impact: All solid waste facilities, including landfills require solid waste facility permits to operate. In the County, the County Department of Environmental Health, Local Enforcement Agency issues solid waste facility permits with concurrence from the California Integrated Waste Management Board under the authority of the Public Resources Code

(Sections 44001-44018) and California Code of Regulations Title 27, Division 2, Subdivision 1, Chapter 4 (Section 21440et seq.).

In October 2014, Governor Brown signed AB 1826 Chesbro (Chapter 727, Statutes of 2014), requiring businesses to recycle their organic waste. On and after January 1, 2016, local jurisdictions across the state were required to implement an organic waste recycling program to divert organic waste generated by businesses, including multi-family residential dwellings that consist of five or more units. Organic waste for the purposes of AB 1826, means food waste, green waste, landscape and pruning waste, nonhazardous wood waste, and food-soiled paper waste that is mixed in with food waste. The law phased in the requirements for businesses over time, while offering an exemption process for rural counties.

As part of the building permit for this project and during construction, this project would be required to comply with the County Ordinance Section 68.508 through 68.518 (Diversion of Construction and Demolition Materials from Landfill Disposal). The ordinance requires a 70 percent diversion rate by the construction and demolition projects, which must include, at a minimum 90 percent diversion of inert material. The project would be in compliance with County ordinances upon submission of a Construction and Demolition Debris Management Plan prior to the issuance of a building permit. Project operations and waste management methods would be consistent with the County's Strategic Plan to Reduce Waste (2017) through the support of commercial composting programs to reduce organic waste and comply with established waste diversion requirements. The project would deposit all solid waste at a permitted solid waste facility, and therefore, would comply with federal, state, and local statutes and regulations related to solid waste.

Operationally, the self-storage managers and the on-site restroom would be the only generators of solid waste from the site. As far as self-storage customer's solid waste, per lease requirements with the applicant, they would be required to haul their own solid waste off the site. Therefore, the project would comply with federal, state, and local management and reduction statutes and regulations related to solid waste, and impacts would be less than significant.

XX. WILDFIRE

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:

a) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

☐	Potentially Significant Impact	☒	Less than Significant Impact
☐	Less Than Significant With Mitigation Incorporated	☐	No Impact

Discussion/Explanation:

Less than Significant Impact: The project is not located in a moderate, high, or very high fire hazard severity zone as mapped by CAL FIRE. The project is completely surrounded by

urbanized developed areas and/or irrigated landscaped lands, and no wildlands are adjacent to the project site. Also, a Fire Service Availability Letter and conditions have been received from the Lakeside Fire Protection District (Appendix K). The Fire Service Availability Letter indicates the expected emergency travel time to the project site to be 3 minutes. The Maximum Travel Time allowed pursuant to the Safety Element is five minutes. Additionally, the project would develop a self-storage facility, which would not pose a fire risk from operations. Therefore, based on the location of the project; review of the project by County staff; and through compliance with the Lakeside Fire Protection District's conditions, the project is not expected to expose people or structures to a significant risk of loss, injury or death involving hazardous wildland fires. Therefore, the project would not expose people or structures to a significant risk of loss, injury or death involving wildland fires.

b) Substantially impair an adopted emergency response plan or emergency evacuation plan?

☐ Potentially Significant Impact ☒ Less than Significant Impact
☐ Less Than Significant With Mitigation Incorporated ☐ No Impact

Discussion/Explanation:

Less than Significant Impact: The project is not located in a moderate, high, or very high fire hazard severity zone. The project would provide emergency access in accordance with the requirements of the Lakeside Fire Protection District. Access to the project would be provided by the existing access road on Cactus Street. Therefore, the proposed project would not impede access of emergency vehicles to the project site or any surrounding areas, and impacts would be less than significant.

c) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentration from a wildfire or the uncontrolled spread of a wildfire?

☐ Potentially Significant Impact ☒ Less than Significant Impact
☐ Less Than Significant With Mitigation Incorporated ☐ No Impact

Discussion/Explanation:

Less Than Significant Impact: The project is not located in a moderate, high, or very high fire hazard severity zone. The project site is surrounded be urbanized, developed land uses. There is no wildland vegetation in the vicinity of the project site; therefore, the proposed project would not exacerbate wildfire risks, nor would it expose project occupants to pollutant concentrations as a result of wildfire occurrence. Therefore, impacts would be less than significant .

d) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

☐ Potentially Significant Impact ☒ Less than Significant Impact
☐ Less Than Significant With Mitigation Incorporated ☐ No Impact

Discussion/Explanation:

Less than Significant Impact: The project would not require installation of any new infrastructure that would exacerbate fire risk or that would result in ongoing impacts to the environment. On-site firefighting water needs would be met from the fire hydrant that are proposed for the project site. The existing fire hydrant along Cactus Street would be moved and located on the north side of the access driveway adjacent to the proposed project. Access to the project site would be provided via the existing 28-foot access driveway off Cactus Street.

e) Expose people or structure to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

☐ Potentially Significant Impact ☒ Less than Significant Impact
☐ Less Than Significant With Mitigation Incorporated ☐ No Impact

Discussion/Explanation:

Less than Significant Impact: As described in Section X, Hydrology, the project site is not currently prone to flooding; therefore, the project site would not be prone to onsite flooding following construction of the project. As described in Section VII, Geology and Soils, the project site was previously graded, is currently flat, and does not provide evidence of landslides on the project site or within the surrounding area. Due to the aforementioned factors, the project site would not expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. Impacts would be less than significant.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE:

a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

☐ Potentially Significant Impact ☐ Less than Significant Impact

☒ Less Than Significant With Mitigation Incorporated ☐ No Impact

Discussion/Explanation:

Less Than Significant Impact with Mitigation: As described in Section IV(a), implementation would not have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal. As described in Section V(b), implementation of Mitigation Measure CUL-1 and CUL-2 would reduce impacts to archaeological resources to less than significant. As described throughout the IS/MND, all other project-level impacts would be less than significant without mitigation. Based on the analysis in this document, the County finds that with the incorporation of required mitigation measures, this project would not have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory. Therefore, this project has been determined not to meet this Mandatory Finding of Significance.

b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

☐ Potentially Significant Impact ☒ Less than Significant Impact
☐ Less Than Significant With Mitigation Incorporated ☐ No Impact

Discussion/Explanation:

The following list of past, present and future projects were considered and evaluated as a part of this Initial Study:

PROJECT NAME	PERMIT/MAP NUMBER
East County Square	SP-94-001
Lakeshore Apartments	STP-14-017
Parkside Villa TPM	TPM-21048

Less Than Significant With Mitigation Incorporated: Per the instructions for evaluating environmental impacts in this Initial Study, the potential for adverse cumulative effects were considered in the response to each question in Sections I through XX of this form. In addition to project-specific impacts, this evaluation considered the projects potential for incremental effects that are cumulatively considerable. As a result of this evaluation, there is no substantial evidence that there are cumulative effects associated with this project. Therefore, this project has been determined not to meet this Mandatory Finding of Significance.

c) Does the project have environmental effects, which would cause substantial adverse effects on human beings, either directly or indirectly?

☐ Potentially Significant Impact
☒ Less Than Significant With Mitigation Incorporated
☐ Less than Significant Impact
☐ No Impact

Discussion/Explanation:

Less Than Significant With Mitigation Incorporated: As discussed in this Initial Study, the proposed project's potentially significant impacts to cultural resources and tribal cultural resources would be mitigated to a less than significant level. All other impacts were deemed less than significant and are discussed in this IS/MND. Therefore, the proposed project would not cause substantial adverse effects on human beings, either directly or indirectly, and the project has been determined not to meet this Mandatory Findings of Significance.

XXII. REFERENCES USED IN THE COMPLETION OF THE INITIAL STUDY CHECKLIST

All references to Federal, State and local regulation are available on the Internet. For Federal regulation refer to http://www4.law.cornell.edu/uscode/. For State regulation refer to www.leginfo.ca.gov. For County regulation refer to www.amlegal.com. All other references are available upon request.

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Disposal. Amended and Effective March 13. https://www.sandiegocounty.gov/content/dam/sdc/dpw/SOLID_WASTE_PLANNING_and_RECYCLING/Files/Updated%20ordinance%20for%20the%20web%20V2.pdf.

2022 County Of San Diego Construction & Demolition (C&D) Debris Recycling Permit Instructions. https://www.sandiegocounty.gov/content/dam/sdc/dpw/SOLID_WASTE_PLANNING_and_RECYCLING/UpdatedCDResources/Permit_Instructions_July22.pdf.

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2004 URS. Jurisdictional Hazard Mitigation Plan San Diego.

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