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December 6August 1, 2024

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

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

Secure Space Self-Storage Bonita; PDS2021-MUP-21-009; PDS2022-CC-22-0102; PDS2021-ER-21-18-003

- Lead agency name and address: County of San Diego, Planning & Development Services 5510 Overland Avenue, Third Floor San Diego, CA 92123
 - a. Contact: Bianca Lorenzana
 - b. Phone number: 619-510-2146
 - c. E-mail: Bianca.Lorenzana@sdcounty.ca.gov
- 3. Project location:

The approximately 10.74-acre project site is located just south of the intersection of Sweetwater Road and Quarry Road at 5780 Quarry Road, in the Sweetwater Community Planning area, within unincorporated San Diego County (County) with associated Assessor Parcel Number's (APNs) 586-050-36, 586-050-44, and 586-050-48. The project site is directly south of State Route (SR-) 54 and west of SR-125. The project site is adjacent to Sweetwater County Park to the east. Figure 1 shows the regional location and Figure 2 shows the project location on a U.S. Geological Survey (USGS) map, and Figure 3 shows the project location on an aerial photograph.

4. Project Applicant name and address:

InSite Property Group LLC 19191 S. Vermont Avenue, Suite 680 Torrance, CA 90502 Contact: Brian Sorensen

5. General Plan Community Plan: Land Use Designation: Village Category Sweetwater Village Residential 2 (VR-2)

6. Zoning Use Regulation: RR (Rural Residential)

7. Description of project:

The project is a Major Use Permit (MUP) to develop a self-storage facility on a portion of an approximately 10.74-acre project site (the "project site"). Within the Rural Residential zone, the proposed use is allowed with issuance of a MUP. Additionally, the self-storage component requires consistency with County Zoning Ordinance Section 6909, which regulates mini-warehouses as part of the Miscellaneous Use Regulations. The proposed use to be regulated by the MUP would be limited to 4.99 acres, pursuant to County Zoning Ordinance Section 2185.c. The project is composed of the 4.99-acre MUP area. The area of disturbance for the project footprint would be limited to the proposed graded parking lot, recreational vehicle (RV) area, storage facility, fuel management, limited building zone, community trails, multi-use pathway, and frontage improvements, that would impact approximately 8.79 acres of the project site and off-site grading would impact an additional 0.24 acre, for a total area of disturbance of 9.03 acres. Off-site improvements include 0.24 acre of disturbance involving the grading for the realignment of Quarry Road and regrading of the neighboring driveway to connect to the realignment of Quarry Road.

As depicted in the site plan (Figure 4), the project includes an approximately 1,023-unit, approximately 132,425-square-foot (sf) self-storage facility, an approximately 1,000-sf leasing office, 109 covered RV parking spaces, and 21 standard passenger vehicle parking spaces for customers and employees. The project's parking area would include electric vehicle (EV) ready spaces and parking spaces with EV charging equipment installed, supporting the use of EVs. The project proposes eight EV capable spaces, three of which are EV capable spaces provided with EV supply equipment. Five loading spaces would be provided by the entrances to the self-storage building. As identified in the project renderings (Figures 5.1 through 5.5) and project elevations (Figures 6.1 through 6.3) the project has been designed as a combination of one-story (leasing office) and two-story (self-storage facility) buildings and would comply with the 35-foot maximum height allowed by the County Zoning Ordinance. The self-storage building includes a basement level that would be used for self-storage. The main storage building would include the installation of a 160 kilowatt (kW) solar array on top of the building roof. The RV parking spaces would be open but covered by carport-style structures. The buildings would be finished with muted tones such as sandstone, grays, and tan-tone colors. The office would operate from 8 a.m. to 8 p.m., seven days per week, 361 days per year.

The project includes the dedication of a biological open space easement over 1.97 acres in the northern portion of the project site that would be implemented as a condition of MUP for the project approval. This area would be protected as a project design feature to ensure the remaining site area remains open space in perpetuity for the duration of the MUP. This open space area would be separated from the MUP boundary by lodgepole fencing and three-wire fencing along the western boundary abutting Quarry Road and would include open space signage to notify the public that no entry is allowed. As depicted in Figure 4, a 100-foot fuel management zone (FMZ) and 100-foot Limited Building Zone (LBZ) easements are included as part of the project to protect both the on-site buildings, while an LBZ is a protective buffer that surrounds the proposed buildings, while an LBZ is a protective buffer that surrounds the proposed buildings and the structures, a space where fuel is managed or modified to minimize the spread of fire to the structure and providing space for defending structures from burning vegetation.

The project would include a total of six signs varying in height and size that total approximately 64 sf. A monument sign is proposed at the southern corner of the site near the Quarry Road and Sweetwater Road intersection, measuring approximately 4 feet tall and 9 feet wide. Wayfinding signage is proposed at the project entrance driveway. <u>Two of the signs, the monument sign mentioned above and a ground-level sign measuring 2.5 by 4 feet by the self-storage building, would have downcast lighting. The remaining 4 signs would have no lighting.</u>

Wrought iron fencing that is 6 feet tall would border the proposed self-storage and RV use area for security purposes. Lodgepole fencing and three-wire fencing would border the proposed biological open space easement and around the perimeter of the site. A 6-foot-tall vertical lift gate is proposed at the eastern edge of the project site. Six-foot-tall wood fencing is proposed internal to the project site along portions of the main access driveway.

A Landscape Plan (Figure 7) was prepared demonstrating compliance with the County of San Diego (County) Landscape Regulations and Sweetwater Community Plan, including the extent and type of irrigation and plantings proposed. Landscaping is proposed along the perimeter of the project site, including along the southern boundary adjacent to the existing single-family residences and along the perimeter of Quarry Road. Landscaping would consist of a drought-tolerant style landscape with a mixture of trees, shrubs, and ground cover. The project site has 46 existing trees on-site. The project proposes the removal of 32 trees; however, each tree removed would be replaced with two native trees consisting of California sycamore (*Platanus racemose*), California live oak (*Quercus agrifolia*), California black walnut (*Juglans californica*) and lemonade berry (*Rhus integrifolia*). The replacement trees would consist of 24-inch boxes of 8- to 10-foot-tall trees that are expected to exceed 20 feet in height once fully grown within five to seven years.

A lighting layout plan was prepared demonstrating compliance with the San Diego Light Pollution Code (LPC) Section 59.108-59.110 and the County Zoning Ordinance. The proposed light fixtures would have full cutoff optics to ensure they are fully shielded to avoid spillover onto adjacent land.

A total of 34 infrared security cameras would be mounted around the self-storage building, the RV parking areas, and leasing office. The cameras would not be placed in the proposed open space easement nor along the perimeter trail.

Off-site improvements include frontage improvements along Quarry Road, realignment of a neighbor's driveway adjacent to the project site to connect to the realignment of Quarry Road, and pipeline connections to water and stormwater facilities in Quarry Road. The proposed sewer facilities connection would require off-site trenching and excavation connecting to an existing sewer main within Quarry Road. The project will improve Quarry Road along the project's entire portion of the frontage from a 20-foot road width to varying 26 feet to 32 feet wide plus a 10-foot-wide multi-use pathway parallel to Quarry Road. Full roadway width improvements of Quarry Road will be completed at the portion of the road that is realigned with Sweetwater Road. Half roadway widths (along the eastern edge of Quarry Road) are proposed to be completed between the realigned portion of Quarry and the project driveway. Quarry Road improvements include reconfiguration of the southern end of Quarry Road to widen the intersection angle of the Quarry Road approach to Sweetwater Road and improve compliance with County public road standards.

The full width of Quarry Road would be improved with new asphalt concrete from the intersection at Sweetwater Road to the project driveway. North of the project driveway, the improvement would taper down to match the existing road surfacing and would include depressed standard curb and gutter and pathway improvements to the edge of the property. Realignment of the neighbor's driveway is proposed to match the new configuration of Quarry Road at its southern end.

In coordination with the County, a 20-foot public trail easement is proposed around the perimeter of the project as well as a 16-foot public trail easement through the proposed biological open easement area that would be dedicated to the County, which would connect to other existing and/or planned County trails. Along Quarry Road, the project would construct a 10-foot-wide multi-use pathway along the entire project frontage. Within the remainder of the trail easement around the perimeter of the project site, a 6-foot-wide public trail with decomposed granite surfacing would be constructed within the trail easement. Maintenance of the trail would be the responsibility of the property owner.

The project site has a general sloping topography from west to east and is moderately sloped. Approximately 8.30 acres of grading would be required including approximately 30,275 cubic yards (CY) of cut and 22,535 CY yard of fill. Approximately 7,740 CY of material would require export. Retaining walls up to 1,350 linear feet and 14 feet in height would be finished in a tan color and located on the northern and southern sides of the project site. Landscaping is proposed along the perimeter of the project site, including along the southern boundary adjacent to the existing single-family residences, and would be located on the outward-facing side of the retaining walls.

Stormwater facilities would include a series of valley gutters, curb and gutters, drainage inlets, and landscaping to collect and convey runoff to different Best Management Practices (BMPs). The BMPs include a series of Modular Wetlands System stormwater BMPs for pollution control before being routed to underground detention tanks for hydromodification control. Flows would be discharged from the tanks and Modular Wetland Systems to a proposed storm drain line that runs southerly on the eastern end of the site and would be discharged via a headwall into the existing creek to the south in compliance with all applicable Regional Water Quality Control Board (RWQCB) requirements.

Fire service would be provided by the Bonita-Sunnyside Fire Protection District (FPD). To meet the FPD and the County's fire code requirements, the project includes a 24-foot fire lane access into the property and around the two buildings and includes a Knox override switch for the proposed gate for emergency access. The project also proposes two fire hydrants, a 100-foot LBZ and FMZ between the proposed structures and proposed open space area to the north to protect both the site buildings and the open space from fire.

The project requires approval of a County Local Agency Formation Commission (LAFCO) annexation to add the project site into the sphere of influence and district boundaries of the County Sanitation District. After annexation, sewer services would be provided through the County Sanitation District, Spring Valley service area. Annexation into the County Sanitation District would be a condition of the MUP and required as a subsequent action in order to provide sewer service to the project site. The project would connect to an existing sewer main within Quarry Road through a proposed 6-inch sewer line in the public right-of-way and a 1.25-inch private force main on private property. Water service would be provided by the Sweetwater Authority. Approximately 1,700 linear feet of 1.5- to 8-inch water pipeline would be installed to provide a connection to the existing Sweetwater Authority water main located in Quarry Road.

The site is subject to General Plan Regional Category Village and Land Use Designation Village Residential 2 (VR-2). The VR-2 Land Use Designation is consistent with the Rural Residential (RR) zone that permits the self-storage facility and RV parking with the issuance of a MUP for Commercial Use Types, pursuant to County Zoning Ordinance Section 2185.c. The project is in conformance with County Zoning Ordinance Section 6909 for mini-warehouse storage and RV parking and the proposed MUP boundary limits the developable area to five acres pursuant to County Zoning Ordinance requirements.

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

The project site is currently undeveloped. Uses surrounding the project site are primarily residential and recreational (see Figure 3). Residential uses are located adjacent to the project site to the south and to the west across Quarry Road. West of Sweetwater Road is the County Animal Shelter. The project site is directly south of SR-54 and west of SR-125. The Bonita Golf Course is located to the south and Sweetwater County Park and the Sweetwater Reservoir are located to the east, across SR-125. The topography of the project site is relatively flat with several berms and mounds from previous grading and dumping. Elevations on the project site range from 128 feet above mean sea level on a slope in the southeast leading down toward the Sweetwater River, to 210 feet above mean sea level on a hill off-site to the northwest.

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

Permit Type/Action	Agency
Major Use Permit	County of San Diego
Landscape Plan	County of San Diego
County Right-of-Way Permits	County of San Diego
Construction Permit	
Excavation Permit	
Encroachment Permit	
Grading Permit	County of San Diego
Grading Permit Plan Change	
Improvement Plans	County of San Diego
Annexation to County Sanitation District	County of San Diego LAFCO
Commercial Wastewater Discharge Permit	County of San Diego
National Pollutant Discharge Elimination	RWQCB
System (NPDES) Permit	
General Construction Storm Water Permit	RWQCB
Waste Discharge Requirements Permit	RWQCB
Water District Approval	Sweetwater Authority
Sewer District Approval	San Diego County Sanitation District
Fire District Approval	Bonita-Sunnyside FPD

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



Note: Conducting consultation early in the California Environmental Quality Act (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 Section 21083.3.2). Information is also available from the Native American Heritage Commission's Sacred Lands File per Public Resources Code Section 5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code Section 21082.3(e) contains provisions specific to confidentiality. On December 10, 2021, the County sent consultation notification letters to Native American tribes on the County's Master List pursuant to the

requirements of Assembly Bill (AB) 52 pertaining to government-to-government consultation regarding the project. Nine Native American tribes were contacted. The following tribes requested consultation: Barona, Jamul, San Pasqual, Sycuan, and Viejas. Consultation was concluded with all consulting tribes except Sycuan. Requests to conclude consultation with Sycuan were made on June 30 and September 22, 2022, and March 20, September 19, October 30, November 13, and December 20, 2023. To date no response has been received. As such, consultation has concluded due to a lack of response from the tribe.

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.

□ <u>Aesthetics</u>	□ <u>Agriculture and Forest Resources</u>	□ <u>Air Quality</u>
⊠ <u>Biological Resources</u>	⊠ Cultural Resources	□ <u>Energy</u>
⊠ Geology & Soils	□ Greenhouse Gas Emissions	□ <u>Hazards & Hazardous</u> <u>Materials</u>
□ <u>Hydrology & Water Quality</u>	□ <u>Land Use & Planning</u>	□ <u>Mineral Resources</u>
□ <u>Noise</u>	□ Population & Housing	□ Public Services
□ <u>Recreation</u>	□ <u>Transportation</u>	□ <u>Tribal Cultural Resources</u>
□ <u>Utilities & Service Systems</u>	□ <u>Wildfire</u>	⊠ <u>Mandatory Findings of</u> Significance

DETERMINATION (To be completed by the Lead Agency)

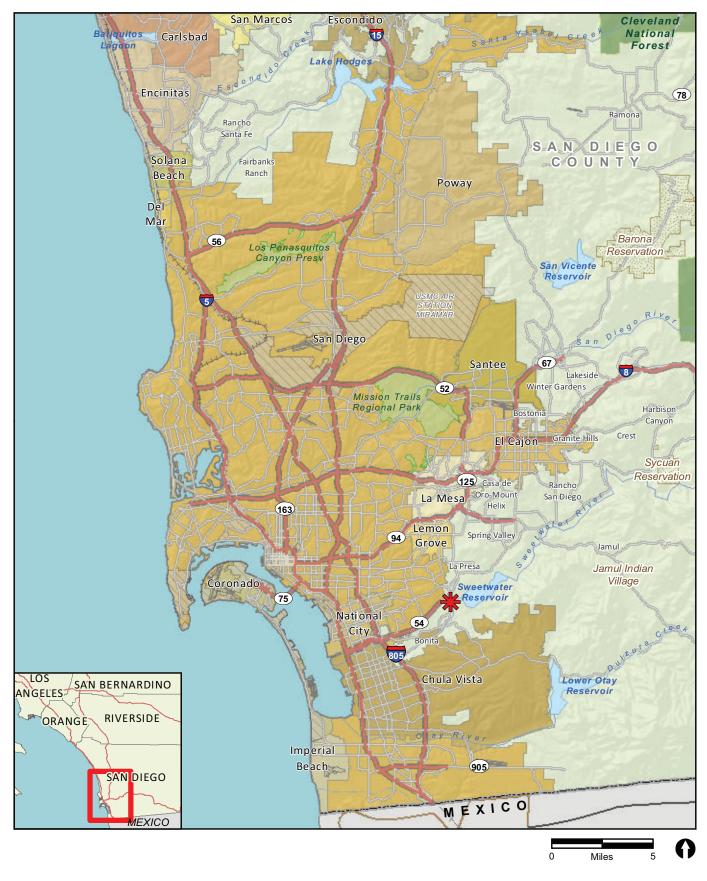
On the basis of this initial evaluation:

- 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 a SUPPLEMENTAL ENVIRONMENTAL IMPACT REPORT is required.

Signature

Date

Bianca Lorenzana



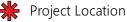
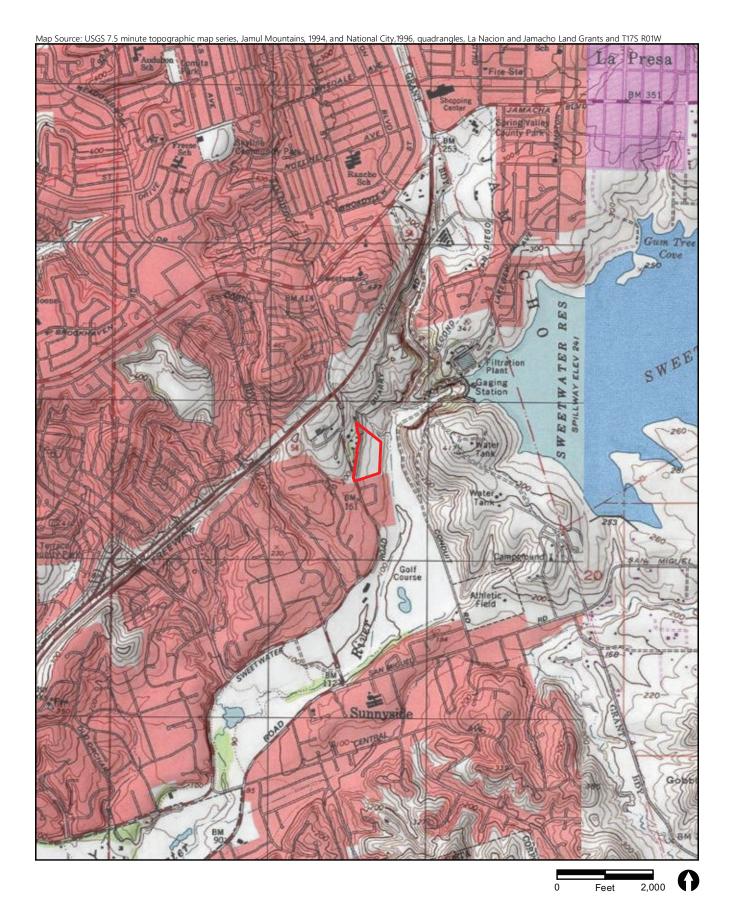


FIGURE 1 Regional Location



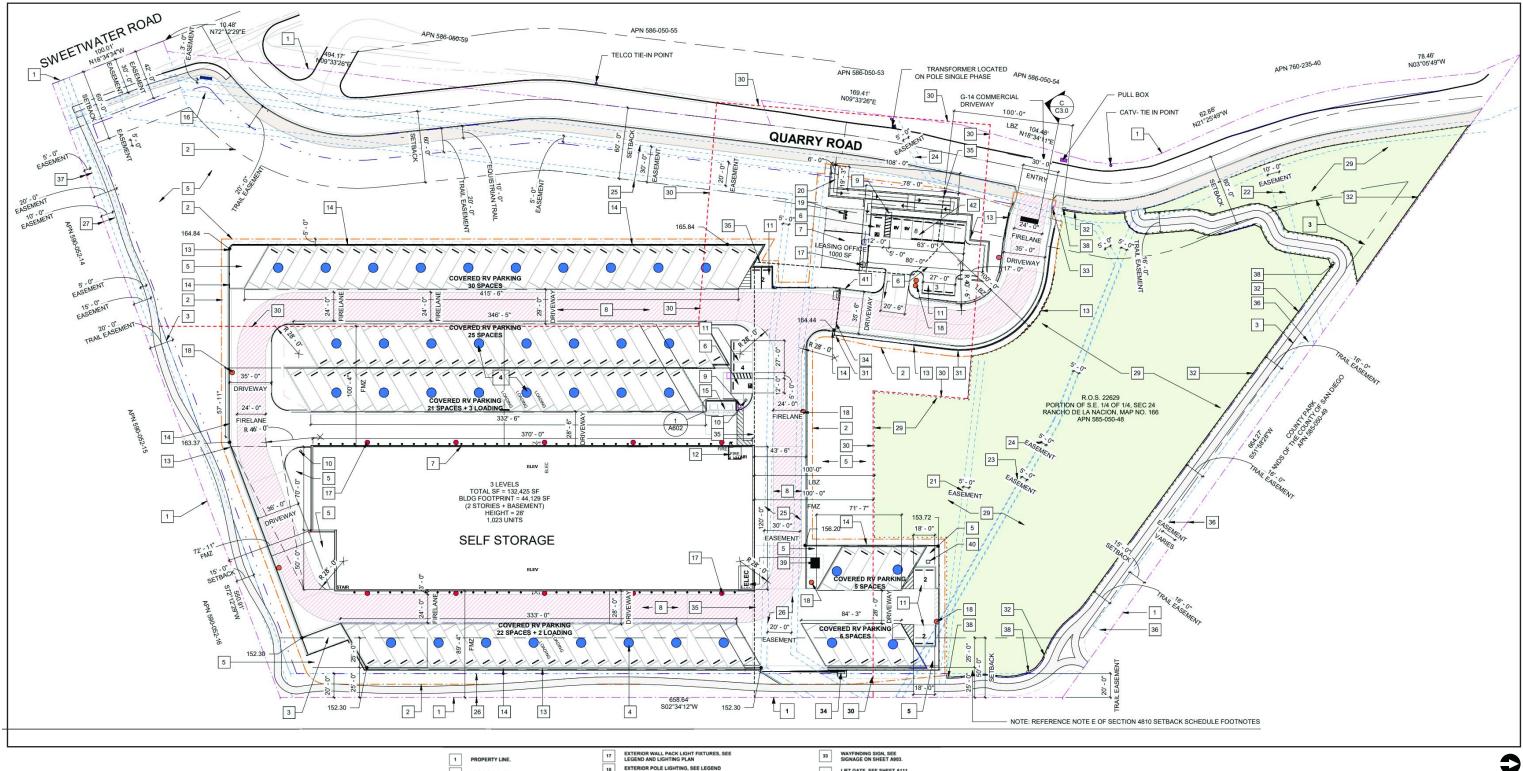
Project Boundary

FIGURE 2 Project Location on USGS Map



Project Boundary

RECON M:\/OBS5\9891\common_gis\fig3_aerial.mxd 03/06/2023 bma FIGURE 3 Project Location on Aerial Photograph



1	PROPERTY LINE.	17	LEGEND AND LIGHTING PLAN	33	SIGNAGE ON SHEET A903.
2	MUP BOUNDARY.	18	EXTERIOR POLE LIGHTING, SEE LEGEND AND LIGHTING PLAN	34	LIFT GATE, SEE SHEET A111 FOR DETAILS.
3	SETBACK LINE.	19	BICYCLE RACK FOR 3 BICYLES.		
	LIGHT FIXTURE, SEE LEGEND AND LIGHTING PLAN.	20	ADA RAMP FROM QUARRY ROAD, SEE CIVIL FOR FINAL SLOPES.	35	LIMITED BUILDING ZONE (LBZ).
5	LANDSCAPE AREA, SEE LANDSCAPE SHEETS.	21	SPRING VALLEY SANTIATION DISTRICT SEWER EASEMENT.	36	SAN DIEGO COUNTY GAS AND ELECTRIC COMPANY PUBLIC UTILITES EASEMENT.
6	PROPOSED ACCESSIBLE PARKING.	22	10' WATER PIPE LINE EASEMENT		5' WIDE EASEMENT FOR
7	BUILDING FOOTPRINT.	23	5' WATER PIPE LINE EASEMENT.	37	WATER PIPE LINE PURPOSES PER SURVEY (NOTE15)
8	24' FIRE ACCESS DRIVE AISLE.	24	5' WATER PIPE LINE EASEMENT.	38	BIOLOGICAL OPEN SPACE EASEMENT SIGN. (SEE NOTES)
9	TRUNCATED DOMES, SEE CIVIL.	25	30' SOUTH BAY IRRIGATION WATER MAIN EASEMENT.	39	ELECTRICAL TRASNFORMER.
10	PROPOSED FIRE HYDRANT, SEE UTILITIES.	26	20' SPRING VALLEY SANITATION DISTRICT ACCESS EASEMENT.		
11	PROPOSED STANDARD PARKING TO MEET MIN. REQUIREMENT OF 9'x18' STALL.	27	10' CALIFORNIA WATER AND TELEPHONE COMPANY SEWER MAIN EASEMENT.	40	SOLAR BATTERY.
12	FIRE RISER.	28	42' PUBLIC HIGHWAY EASEMENT.	41	KEY BOX FOR SWEETWATER
13	RETAINING WALL , SEE SHEET A11 & A401	29	BIOLOGICAL OPEN SPACE EASEMENT		AUTHORITY AND SANITATION.
14	6'-0" WROUGHT IRON FENCING, SEE SHEET A111.	30	100' FUEL MANAGEMENT ZONE (FMZ)	42	EV CAPABLE STANDARD PARKING, TO MEET MIN. REQUIREMENT OF 9'x18' STALL.
15	TRASH ENCLOSURE, SEE SHEET A602.	31	6' WOOD FENCING, SEE SHEET A111.		
16	MONUMENT SIGN, SEE SIGNAGE ON SHEET A903.	32	4' LODGE POLE FENCING AT BIOLOGICAL OPEN SPACE EASEMENT.		



06/17/24 fmm

FIGURE 4 Site Plan

Image Source: roZEN



PROJECT RENDERING 1



PROJECT RENDERING 2



PROJECT RENDERING 3



PROJECT RENDERING 4

FIGURE 5.1 Project Rendering

Image Source: roZEN



PROJECT RENDERING 5



PROJECT RENDERING 6



PROJECT RENDERING 7



PROJECT RENDERING 8

FIGURE 5.2 Project Rendering



PROJECT RENDERING 3 - NIGHT



PROJECT RENDERING 4 - NIGHT



PROJECT RENDERING 6 - NIGHT



FIGURE 5.3 Project Rendering Image Source: roZEN



PROJECT RENDERING 9 -NE AXON

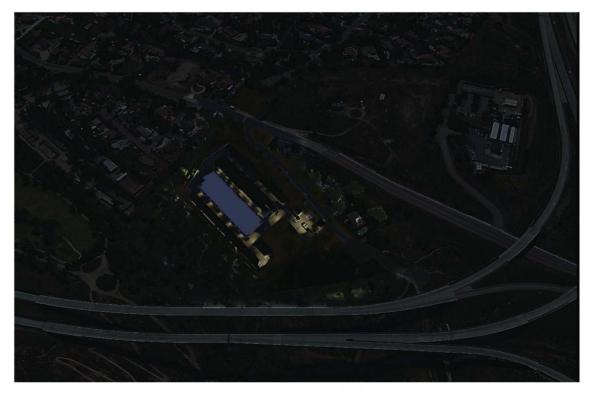


PROJECT RENDERING 9 -SW AXON

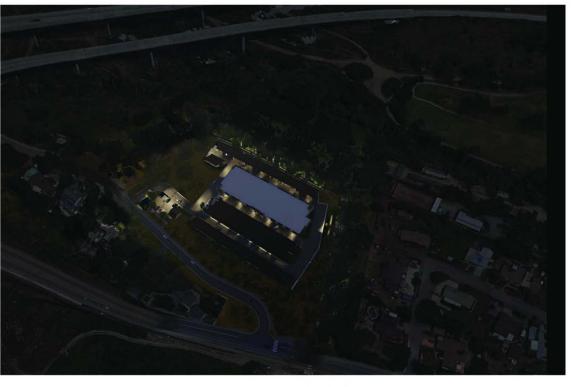




PROJECT RENDERING 9 -NW AXON



NE AXON - NIGHT VIEW



SW AXON - NIGHT VIEW

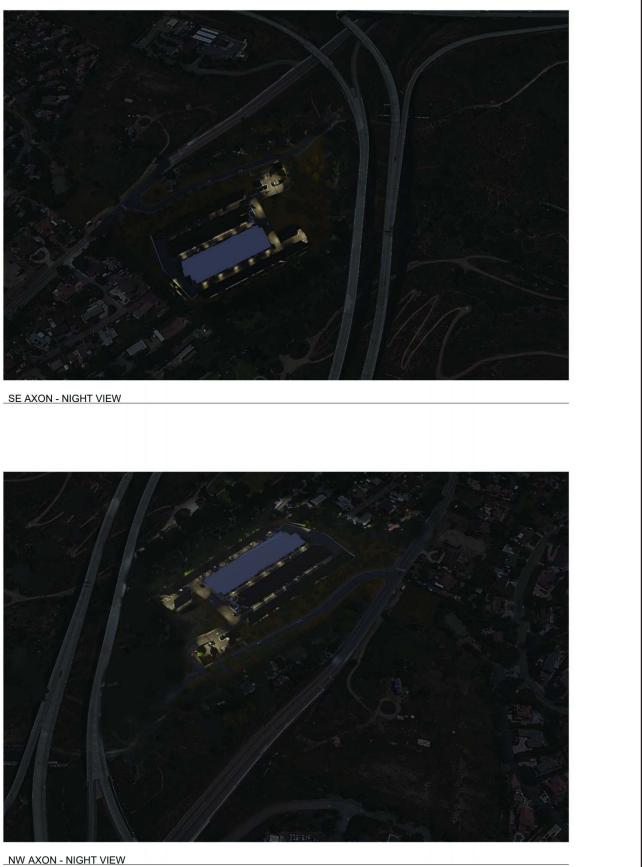
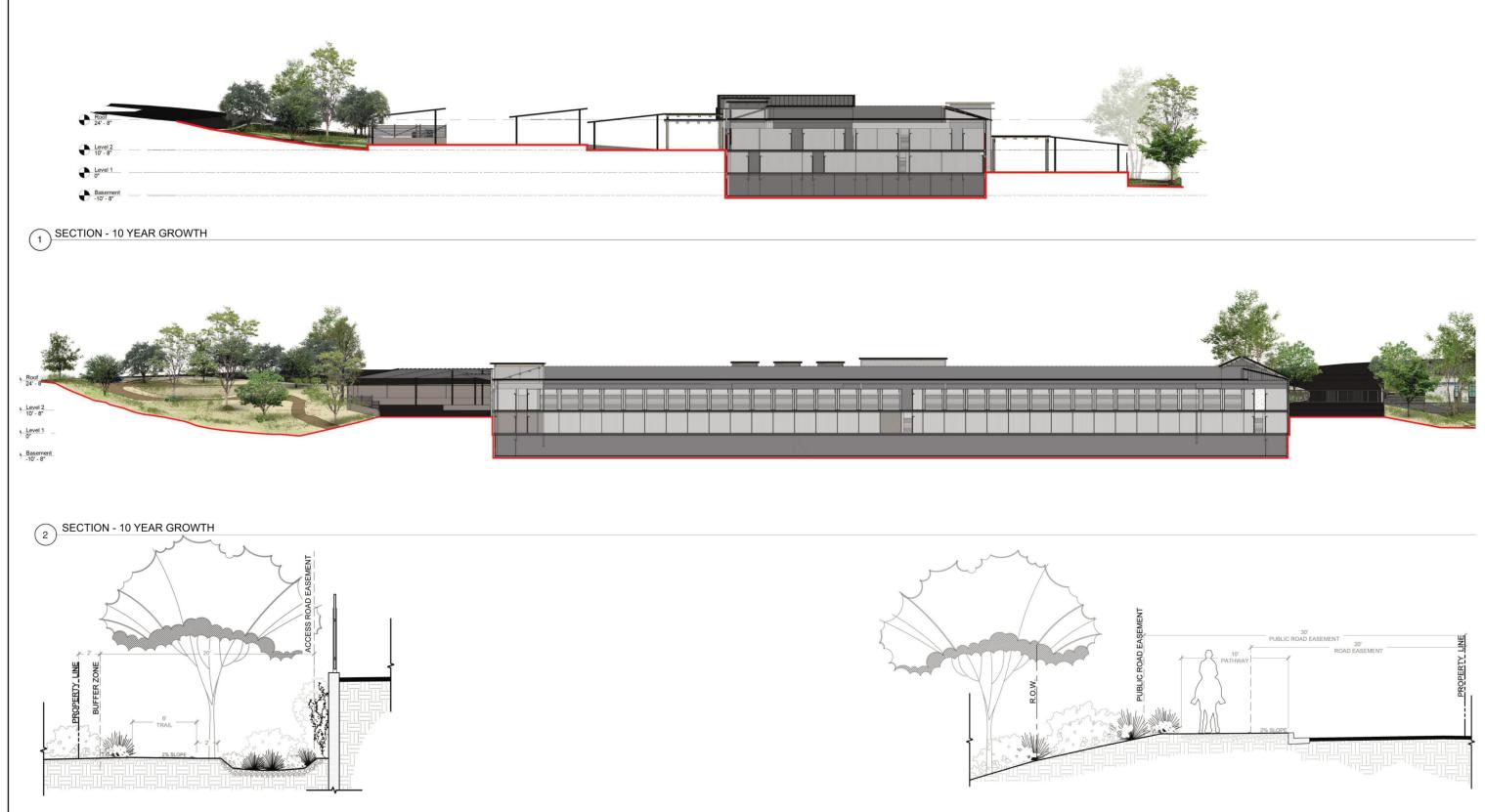




FIGURE 5.5 Project Rendering





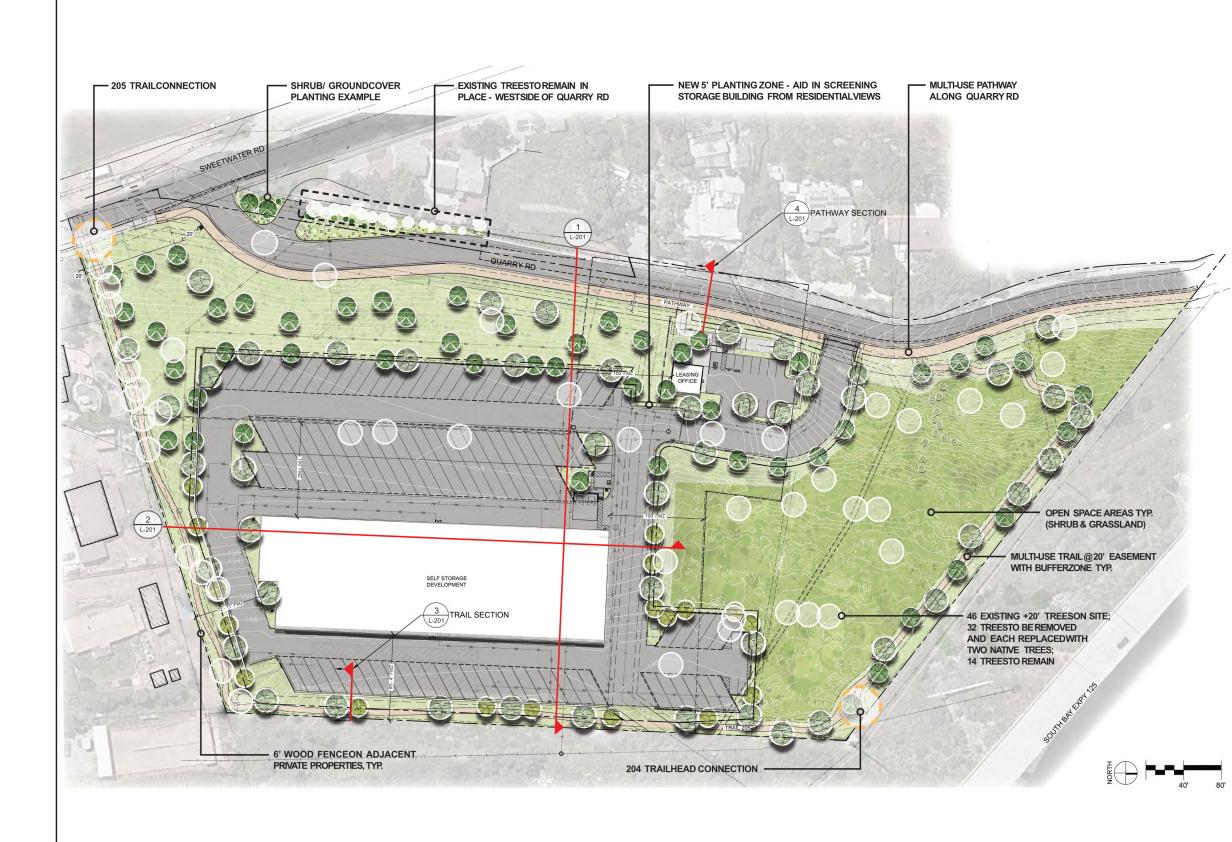
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Image Source: roZEN
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FIGURE 6.2 Project Elevations



FIGURE 6.3 Project Elevations



PLANT LEGEND



REPLACEMENT TREE SPECIES	MIN CAL		
NAME	SIZE	HxW	
PLATANUS RACEMOSA CALIFORNIA SYCAMORE	24" BOX	3" CAL. 9' X 3'	
QUERCUS AGRIFOLIA CALIFORNIA LIVE OAK	24" BOX	3" CAL. 8' X 4'	
JUGLANS CALIFORNICA CALIFORNIA BLACK WALNUT	24" BOX	3" CAL. 10' X 4'	
EXISTING NATIVE PLANT MATERIAL TO REMAIN IN PLACE	VARIES		
RHUS INTEGRIFOLIA LEMONADE BERRY	24" BOX		

SHRUBS

NAME	SIZE
AURANTICARPA RHOMBIFOLIA QUEENSLAND PITTOSPORUM	15 GAL
DIPLACUS LONGIFLORUS CONEJO MONKEY FLOWER	5 GAL
TRICHOSTEMA LANATUM WOOLLY BLUE CURLS	5 GAL
ARCTOSTAPHYLOS HOOKERI FRANCISCANA FRANCISCANA MANZANITA	5 GAL
RUBUS URSINUS PACIFIC BLACKBERRY	5 GAL
	AURANTICARPA RHOMBIFOLIA QUEENSLAND PITTOSPORUM DIPLACUS LONGIFLORUS CONEJO MONKEY FLOWER TRICHOSTEMA LANATUM WOOLLY BLUE CURLS ARCTOSTAPHYLOS HOOKERI FRANCISCANA FRANCISCANA MANZANITA RUBUS URSINUS

GROUNDCOVER

	NAME	SIZE
\otimes	SALVIA LEUCOPHYLLA PURPLE SAGE	1 GAL
*	BACCHARIS PILULARIS 'PIGEON POINT' DWARF COYOTE BRUSH	1 GAL
T.F	RIBES INDECORUM WHITE CHAPARRAL CURRANT	1 GAL
$\overline{\mathbb{O}}$	ERIOPHYLLUM CONFERTIFLORUM GOLDEN YARROW	1 GAL

NOTES

1. ALL NEW PLANTING / LANDSCAPE AREAS TO RECEIVE 3" MINIMUM OF ORGANIC STABILIZING MULCH TOPDRESS

2. ALL NEW LANDSCAPE AREAS ARE TO BE PLACED ON LOW WATER USE DRIP IRRIGATION TO ENSURE WATER EFFICIENCY. ALL REMAIN IN PLACE TREES ON WEST SIDE OF QUARRY ROAD WILL ALSO BE PLACED ON DRIP IRRIGATION SYSTEM. ALL IRRIGATION SHALL BE AUTOMATICALLY CONTROLLED AND COMPLIANT WITH THE COUNTY'S WATER CONSERVATION AND LANDSCAPING ORDINANCE

3. ROCK OUTCROP WILL BE LEFT IN CONSERVATION EASEMENT. NO INDIGENOUS EXISTING TREES ON SITE

4. SECURE SPACE STORAGE TO **PROVIDE LANDSCAPE MAINTENANCE** WITHIN THE MUP BOUNDARY. SECURE SPACE STORAGE TO PROVIDE TRAIL MAINTENANCE TWO TIMES PER YEAR FOR TRAIL 205. CONSERVATION EASEMENT ON PRIVATE PROPERTY WILL BE LEFT IN A NATURAL STATE WITH NO REGULAR LANDSCAPE MAINTENANCE

- 20 -

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?

- D Potentially Significant Impact
- Less than Significant Impact
- Less Than Significant With Mitigation
 Incorporated
- □ 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.

As described in the General Plan Update Environmental Impact Report (GPU EIR; County of San Diego 2011a), 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 have the potential to obstruct, interrupt, or detract from a scenic vista.

Less than Significant Impact: The analysis within this section is based on project renderings and elevations prepared for the project (see Figures 5.1–5.4 and Figure 6.1–6.3). A number of RCAs are identified within the Sweetwater Community Plan that are located within approximately 3 miles of the project site. While the RCAs within a 2-mile radius of the project site are generally focused on protection of sensitive habitats, there is one RCA identified as a visual resource: Mother Miguel (also called San Miguel) Mountain. San Miguel Mountain is located approximately 1.6 miles southeast of the project site. Due to distance, intervening topography, and the elevation of the project site, the project would not detract from any views of the aforementioned RCA. In addition, the project would not be expected to diminish any viewsheds from the RCAs. Because of the distance and intervening topography, viewsheds to and from the San Miguel Mountain would not be adversely impacted by the project.

The project proposes to develop a public trail around the perimeter of the project site as well as through the proposed biological open easement area. The trails would be dedicated to the County for the enhancement of the County public trail system, connecting to other existing and/or planned County trails. The project would also include construction of a new multi-use pathway along Quarry Road. The project site is just west of Sweetwater County Park, which includes the Sweetwater Regional Trail. The visibility of the project site from the trail is restricted due to intervening land uses and/or vegetation. Moreover, the project MUP would be conditioned to dedicate a biological open space easement over 1.97 acres of the project site. This area would not be developed allowing the retention of views of existing undeveloped lands.

While the project site is 10.74 acres, the MUP area is limited to 4.99 acres, and the total area of disturbance is 9.03 acres. The area of disturbance for the project footprint would be limited to the proposed graded parking lot, RV area, storage facility, fuel management, limited building zone, community trails, multi-use pathway, and frontage improvements, that would impact approximately 8.79 acres of the site and off-site grading would impact an additional 0.24 acre, for a total are of disturbance of 9.03 acres. Off-site improvements include 0.24 acre of disturbance involving the grading for the realignment of Quarry Road and regrading of the neighboring driveway to connect to the realignment of Quarry Road.

As detailed in the project description, enhanced perimeter landscaping is proposed to improve the visual appearance of the site once established and help screen views into the project site from off-site public vantage points (i.e., Quarry Road). As seen in Figures 6.1–6.3, the project is designed to take advantage of the site topography. Views of the buildings would be shielded by including a basement level in the storage facility that would reduce the visibility and height of the proposed building. The project's off-site improvements are limited to site access from Quarry Road, realignment of a neighbor's driveway adjacent to the project site, and off-site trail connections. The proposed landscaping, site design, and trail construction would soften views of the site from neighboring scenic vistas.

Overall, the project would not affect on-site or off-site features having scenic value, including the scenic vistas, which may contribute to the visual character or image of the neighborhood or community. Although the project would alter the existing condition of the project site thereby changing the visual landscape of the area, no significant visual resources or vistas either on-site or off-site would be removed, substantially altered, or otherwise affected as a result of project construction. Therefore, the project would not have a substantial adverse effect on a scenic vista, and impacts would be less than significant.

In addition, the project would not result in cumulative impacts on a scenic vista as the projects listed in Section XXI.b) are not expected to result in significant impacts to a scenic vista because they would be required to adhere to development and design standards that would not cause view blockage of the designated scenic vistas. Therefore, the project would not contribute to a cumulatively considerable impact related to scenic vistas.

- 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 Impact
 - □ Less Than Significant With Mitigation □ No Impact □ Incorporated

Discussion/Explanation:

State scenic highways refer to those highways that are officially designated by the California Department of Transportation (Caltrans) as scenic (<u>Caltrans - California Scenic Highway Program</u>). 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 SR-125, which is designated as scenic from SR-94 to Interstate 8 near the city of La Mesa. The scenic portion of SR-125 is located approximately 11 miles north of the project site. Due to the distance and intervening

topography, the project site would not be visible from any scenic highway. Therefore, the project would not result in impacts within a state scenic highway.

The County General Plan, Conservation and Open Space Element Table COS-1 identifies a County Scenic Highway System. The project site is located adjacent to the intersection of Quarry Road and Sweetwater Road. Sweetwater Road (identified as Sweetwater River Roads in the General Plan Table COS-1) is a designated County scenic route. Bonita Road and San Miguel roads are also designated County scenic routes, located approximately one mile south of the project site.

The General Plan Conservation and Open Space Element identifies the following two policies relative to County Scenic Highways:

- COS-11.1 Protection of Scenic Resources. Require the protection of scenic highways, corridors, regionally significant scenic vistas, and natural features, including prominent ridgelines, dominant landforms, reservoirs, and scenic landscapes.
- COS-11.2 Scenic Resource Connections. Promote the connection of regionally significant natural features, designated historic landmarks, and points of regional historic, visual, and cultural interest via designated scenic corridors, such as scenic highways and regional trails.

The area of disturbance for the project footprint would be limited to the proposed graded parking lot. RV area, storage facility, fuel management, limited building zone, community trails, multi-use pathway, and frontage improvements that would impact approximately 8.79 acres of the site and off-site grading would impact an additional 0.24 acre, for a total area of disturbance of 9.03 acres. Off-site improvements include 0.24 acre of disturbance involving the grading for the realignment of Quarry Road and regrading of the neighboring driveway to connect to the realignment of Quarry Road. Traveling south on Sweetwater Road, views of the project site are obstructed by manufactured slopes associated with adjacent freeway development; however, the project would be visible by motorists traveling north along Sweetwater Road. Views of the project site from passing motorists on Sweetwater Road would be brief and limited to a short stretch of roadway near Quarry Road. Additionally, existing views in this location include the two existing overpass bridges associated with SR-125. The project would incorporate design features such as landscape screening, use of muted colors and tones (sandstone, grays, tans) for the proposed buildings, and increased setbacks to blend in with the surrounding landscape. Moreover, the project has also been designed to be consistent with the Sweetwater Community Plan and Design Guidelines where the architectural style and use of muted colors are encouraged. Specifically, the project buildings have been designed to be one- and two-story buildings in muted tones (sandstone, grays, tans) with low-pitched roofs to mimic the character of existing uses found in the project vicinity. The project site would therefore not conflict with visual elements or quality of the existing area along Sweetwater Road. Views from the additional roadways of San Miguel Road and Bonita Road, would also be obscured due to the distance from the project site, intervening development, established landscaping and topography.

A small portion of the rock outcrop (geologic formation), less than 0.01 acre (703 square feet), will be covered in fill as a result of roadway improvements required along the portion of Quarry Road nearest the outcrop on the northwestern boundary. The remainder of this feature occurs within the biological open space easement and will be preserved. This represents an impact to less than 10 percent of the resource and would not be a significant impact.

The project would therefore not result in a significant visual inconsistency of character or quality from the aforementioned roads. Due to the project's incorporated design features, established and proposed landscaping, topography, distance from project site and elevation between the viewing location and the project site, as well as existing intervening development, the project would not substantially damage scenic resources or a scenic highway. The project impacts would therefore be less than significant.

The project would not result in cumulative impacts on a scenic highway because the project in conjunction with the projects listed in Section XXI.b) are not located within a state scenic highway. Therefore, the project would not contribute considerably to a cumulative impact to state scenic highways. Therefore, the project would not result in any adverse project or cumulative level effect on a scenic resource within a state scenic highway.

- c) Substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?
 - □ Potentially Significant Impact ⊠ Less than Significant Impact
 - □ Less Than Significant With Mitigation □ No Impact Incorporated

Discussion/Explanation:

Less than Significant Impact: 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.

The project site is located adjacent to a portion of Sweetwater Road, which is identified as a County Scenic Roadway in the General Plan. As detailed in Section I.b), motorists traveling north along Sweetwater Road would have brief views of the project site, which would represent a public view. The existing visual character and quality of the project site and surroundings can be characterized as relatively rural with substantial surrounding open space, including some residential, civic, and commercial uses. Additionally, the freeway interchange, which includes several freeway bridges associated with SR-125 and SR-54, represents a substantial visual feature in the landscape.

The plot plan, elevations, landscape plan, and visual simulations illustrate that the proposed structures would be unobtrusive to the surrounding viewshed. The project site is at a low elevation in relation to surrounding views, which would reduce visibility of proposed buildings from surrounding viewpoints. Other than the view from Sweetwater Road and Quarry Road (a non-scenic road), public views of the site would be limited. The project site would not be visible from the Sweetwater Summit Regional Park or campground area due to intervening topography. The project site may be visible from passing motorists along SR-125 and SR-54.

The project's area of disturbance would be limited to 9.03 acres out of the 10.74-acre project site. As stated in the project description, the 9.03-acre project footprint area of disturbance comprises of the 4.99-acre MUP boundary and grading would be limited to the proposed parking lot, RV area, storage facility, FMZ, LBZ for fuel management, community trails, pathway, frontage improvements and off-site grading for the realignment of Quarry Road and a neighbor's driveway. As explained in detail above and below, the proposed buildings would be compatible with the existing visual environment's visual character and quality as it has been designed in conformance with the Sweetwater Community Plan and Design Guidelines. For example, the landscape plan proposes perimeter landscaping that would enhance the visual appearance of the project site once developed and help screen views into the project site from off-site public vantage points (i.e., Quarry Road and Sweetwater Road). The main storage facility building would be visible to adjacent residential land uses located to the south. The nearest residences to the south are approximately 85 to 100 feet from the proposed main storage facility building. However, views

from the south would be limited due to the elevated topography, proposed trail, and landscaping. Additionally, the project would increase the number of trees on-site. All trees would be native and would be planted in sizes expected to exceed 20 feet in height once fully grown within five to seven years.

The project includes a total of six signs designed in conformance with the Sweetwater Community Plan and County Zoning Ordinance. The proposed signs would vary in height and size and total approximately 64 sf. The largest monumental sign would be approximately 36 sf, 4 feet in height, and 9 feet wide located at the southern corner of the project site near the Quarry Road and Sweetwater Road intersection. Also, 6-foot wrought iron, 4-foot lodgepole fencing, and 14-foot retaining walls finished in a tan color and located around the project site would be incorporated into the design to help screen the project from public roadways and adjacent residential properties. Additionally, the buildings would be finished with sandstone and tan-tone colors, which helps to blend the structures into their surroundings.

Project renderings (see Figure 5.1–5.4) show the visual bulk of the proposed on-site structures would be reduced by providing two individual buildings and covered parking, rather than one large structure to house all the storage facility operations and parking. The project has been designed as a combination of one-story and two-story buildings and generally at a lesser building height (approximately 34 feet) than that allowed under the existing zoning for Residential-Rural use (35 feet), thereby reducing the visual scale of the structures within the landscape. The design of the building façade for the main storage facility building breaks up the elongated elevations through a series of plane and material changes and expressed pitched roofs. This design approach further reduces the potential for the structures to visually dominate the site or to conflict with the building size of other use types in the area.

Although larger than the adjacent residential homes, the project would appear similar in bulk and scale because the placement of buildings would be set back from the public road and would be located partially underground. The placement of the buildings within the 4.99-acre MUP area would minimize visual impacts as the buildings would be limited to only a portion of the 10.74-acre project site. The nearest building to Quarry Road is the proposed leasing office which would be set back over 60 feet, while the main self-storage facility building would be located over 200 feet from Quarry Road, in part to distance potential public views of the buildings. The proposed covered RV parking would be set back by approximately 60 feet from Quarry Road and would be buffered by landscaping and proposed fencing. By distancing the proposed on-site buildings from the western property lines and increasing the distance at which views would be experienced from off-site public vantage points, the apparent bulk, and/or scale of the proposed project would be reduced. The increased distance allows the buildings to appear smaller from the public vantage point of motorists and pedestrians traveling along Quarry Road. Additionally, a majority of viewer groups, including motorists traveling along Quarry Road and Sweetwater Road and other public roadways (i.e., SR-54, SR-125, etc.), would have limited views of the project due to existing topography, existing and proposed vegetation, intervening development as well as limited viewer exposure due to travel speed. Additionally, for the traveler along SR-125, the structures buildings would be set back and additionally buffered by the 1.97 acres of biological open space (easement) that would be required as a condition of the MUP for the project in the northern portion of the project site adjacent to the highway.

Views of the project from these public vantage points, with the exception of those properties immediately adjacent to the project site, would generally be decreased due to distance and intervening vegetation and development. The appearance of the project elements within the landscape 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 project 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, the project would not degrade the existing visual character or quality of public views and its surroundings, and impacts would be less than significant.

The project would not result in cumulative impact to the existing visual character or quality of public views. The projects listed in Section XXI.b) are located within the viewshed surrounding the project and would be required to comply with the County's and Sweetwater Community Plan design guidelines and would be compatible with their surroundings. Therefore, the project would not contribute to cumulatively considerable impact related to visual character or quality of public views.

- 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 □ No Impact

Discussion/Explanation:

Pursuant to the County Code of Regulatory Ordinances Section 51.203 LPC, all areas within a 15-mile radius of the center of the Palomar Observatory and the center of Mount Laguna Observatory are designated as Zone A, with all other areas in the unincorporated area of the County designated as Zone B. Zone A has more stringent lighting restrictions due to its proximity to the observatories, including limits on decorative lighting.

Less than Significant Impact: The project site is not located within Zone A or within 15 miles of the Mount Laguna Observatory or Palomar Observatory as identified in Figure 2.1-8 of the County GPU EIR (County of San Diego 2011a). As seen in Figure 5.3, the project would not adversely affect nighttime views or astronomical observations, because the project would conform to the LPC (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 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 highgloss 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 impacts on day or nighttime views because the project would conform to the LPC. The LPC was developed by the County Planning & Development Services Department (PDS) and Department of Public Works in cooperation with lighting engineers, astronomers, land use planners from San Diego Gas and Electric (SDG&E), 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 LPC are the result of this collaborative effort and establish an acceptable level for new lighting. Compliance with the LPC 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 LPC would ensure that the project would not create a significant new source of substantial light or glare that would adversely affect daytime or nighttime views in the area, on a project or cumulative level. Therefore, the project would not create a significant new source of substantial light or glare, and impacts would be less than significant.

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

Incorporated

- □ Less than Significant Impact
- □ Less Than Significant With Mitigation Incorporated

☑ No Impact

Discussion/Explanation:

No Impact: The project site had previous agricultural activities such as an orchard located at the northern portion of the site; however, this orchard was removed and replaced with ranch facilities which have been demolished and only foundations remain. The project site does not contain any lands designated as Prime Farmland, Unique Farmland, or Farmland of Statewide or Local Importance as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency. Therefore, no agricultural resources including Prime Farmland, Unique Farmland, or Farmland of Statewide or Local Importance would be converted to a non-agricultural use.

- b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?
 - □
 Potentially Significant Impact
 □
 Less than Significant Impact

 □
 Less Than Significant With Mitigation
 ⊠
 No Impact

Discussion/Explanation:

No Impact: The project site is zoned Rural Residential (RR), which is not considered to be an agricultural zone. Additionally, the project site's land is not under a Williamson Act Contract. 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 Impact
 - □ Less Than Significant With Mitigation ⊠ No Impact Incorporated

- 28 -

Discussion/Explanation:

No Impact: The project site, including off-site improvements, does not contain forest lands or timberland. The County does not have any existing Timberland Production Zones. 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 or 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 Impact
 - □ Less Than Significant With Mitigation ⊠ No Impact Incorporated

Discussion/Explanation:

No Impact: The project site, including any off-site improvements, 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 off-site forest resources. Therefore, project implementation would not result in the loss or conversion of forest land to a non-forest use. No impact would occur.

- 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 Impact
 □ Less Than Significant With Mitigation
 □ Impact
 No Impact

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Incorporated

Discussion/Explanation:

No Impact: The project site and surrounding area within a radius of one-quarter mile does not contain any active agricultural operations or lands designated as Prime Farmland, Unique Farmland, or Farmland of Statewide or Local Importance as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency. Therefore, no Prime Farmland, Unique Farmland, Farmland of Statewide or Local Importance, or active agricultural operations would be converted to a non-agricultural use.

III. AIR QUALITY

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 Impact
 - □ Less Than Significant With Mitigation □ No Impact □ Incorporated

Discussion/Explanation:

An Air Quality and Greenhouse Gas Analysis (dated June 24, 2024) was prepared for the project by RECON Environmental, Inc. (RECON) (Appendix A).

Less than Significant Impact: Project consistency with the RAQS and SIP is based on whether the project would conflict with or obstruct implementation of the RAQS and/or applicable portions of the SIP, which would lead to increases in the frequency or severity of existing air quality violations. The RAQS is the applicable regional air quality plan that sets forth the San Diego County Air Pollution Control District's (SDAPCD's) strategies for achieving the National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards. The San Diego Air Basin (SDAB) is designated a non-attainment area for the federal and state ozone standard. Accordingly, the RAQS was developed to identify feasible emission control measures and provide expeditious progress toward attaining the standards for ozone. The two pollutants addressed in the RAQS are reactive organic gases (ROG) and oxides of nitrogen (NO_X), which are precursors to the formation of ozone. Projected increases in motor vehicle usage, population, and growth create challenges in controlling emissions and, by extension, to maintaining and improving air quality. The RAQS was most recently updated in 2022.

The growth projections used by the SDAPCD to develop the RAQS emissions budgets are based on the population, vehicle trends, and land use plans developed in general plans and used by the San Diego Association of Governments (SANDAG) in the development of the regional transportation plans and sustainable communities strategy. As such, projects that propose development that is consistent with the growth anticipated by SANDAG's growth projections and/or the County's General Plan would not conflict with the RAQS. In the event that a project would propose development that is less dense than anticipated by the growth projections, the project would likewise be consistent with the RAQS. In the event a project proposes development that is greater than anticipated in the growth projections, further analysis would be warranted to determine if the project would exceed the growth projections used in the RAQS for the specific subregional area.

The project site is designated VR-2 (Village Residential) in the County's General Plan and is zoned RR (Rural Residential). Self-storage and RV parking are allowable uses with the issuance of a MUP, pursuant to Zoning Code Section 2185.c. The project would construct a self-storage and RV parking use and would not result in an increase in population growth projections used to develop the RAQS. Additionally, as stated in the Transportation Assessment Memorandum (Appendix B), the project is considered a locally-serving retail/service project. These types of projects generally improve the convenience of retail/service uses close to home and have the effect of reducing vehicle travel. The vehicle emissions for the project were calculated using the standard trip generation rate for mini-warehouse uses and the default trip length and are therefore conservative since they do not reflect that the project is a locally-serving project. As detailed in the Air Quality Analysis (see Appendix A), the project would not result in construction or operational emissions in excess of the applicable significance thresholds for all criteria pollutants (see also Tables 3 and 4). The project would, therefore, not result in an increase in emissions that are not already accounted for in the RAQS. Thus, the project would not obstruct or conflict with implementation of the RAQS. Impacts would be considered less than significant.

Cumulative development is not anticipated to result in significant impacts in terms of conflicting with the RAQS and SIP because the cumulative projects listed in Section XXI.b) would be consistent with the County's General Plan and the growth anticipated under the plans. Therefore, the project would not contribute to a cumulative impact related to conflicting with or obstructing implementation of the RAQS or SIP.

- 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:

Less than Significant Impact: A project would have a significant direct impact related to criteria pollutants if it would exceed any of the County's Screening Level Thresholds (SLTs) presented in Table 1 below. The County's SLTs are based on SDAPCD Rules 20.1, 20.2, and 20.3 and were adopted from the SDAPCD Air Quality Impact Analysis trigger level thresholds to align with attainment of the NAAQS and be protective of public health. Therefore, air quality emissions below the SLTs would meet the NAAQS. The NAAQS were developed to protect public health, specifically the health of "sensitive" populations, including asthmatics, children, and the elderly.

Table 1 County of San Diego Screening Level Thresholds						
		Emission Rate				
Pollutant	Pounds/Hour	Pounds/Day	Tons/Year			
Respirable Particulate Matter (PM ₁₀)		100	15			
Fine Particulate Matter (PM _{2.5})		55ª	10 ^a			
Oxides of Nitrogen (NO _x)	25	250	40			
Oxides of Sulfur (SO _X)	25	250	40			
Carbon Monoxide (CO)	100	550	100			
Lead and Lead Compounds		3.2	0.6			
Volatile Organic Compounds (VOCs)		75 ^b	13.7°			
 SOURCE: SDAPCD, Rules 20.1, 20.2, 20.3; County of San Diego 2007. ^a Based on the U.S. EPA "Proposed Rule to Implement the Fine Particle National Ambient Air Quality Standards" published September 8, 2005. Also used by the South Coast Air Quality Management District. ^b Threshold for VOCs based on the threshold of significance for VOCs from the South Coast Air Quality Management District for the Coachella Valley. ^c 13.7 tons per year threshold based on 75 pounds per day multiplied by 365 days per year and divided by 						

2,000 pounds per ton.

Air emissions were calculated using California Emissions Estimator Model (CalEEMod) 2020.4.0 (California Air Pollution Control Officers Association 2021). 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 (PM₁₀), 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

Construction-related activities are temporary, short-term sources of air emissions. Sources of construction-related air emissions include:

- Fugitive dust from site preparation and grading activities;
- Construction equipment exhaust;
- Construction-related trips by workers, delivery trucks, and material-hauling trucks; and
- Construction-related power consumption.

Construction-related pollutants result from dust raised during site preparation and grading, emissions from construction vehicles, and chemicals used during construction. Fugitive dust emissions vary greatly during construction and are dependent on the amount and type of activity, silt content of the soil, and the weather. Vehicles moving over paved and unpaved surfaces, demolition, excavation, earth movement, grading, and wind erosion from exposed surfaces are all sources of fugitive dust. Construction operations are subject to the requirements established in SDAPCD Regulation 4, Rules 52, 54, and 55. Rule 52 sets limits on the amount of particulate matter that can be discharged into the atmosphere. Rule 54 sets limits on the amount of dust and fumes that can be released into the atmosphere. Rule 55 regulates fugitive dust and provides roadway dust track-out/carry-out requirements.

Heavy-duty construction equipment is usually diesel powered. In general, emissions from diesel-powered equipment contain more NO_X, SO_X, and PM than gasoline-powered engines. However, diesel-powered engines generally produce less CO and less ROG than gasoline-powered engines. Standard construction equipment includes tractors/loaders/backhoes, rubber-tired dozers, excavators, graders, cranes, scrapers, forklifts, rollers, paving equipment, generator sets, welders, cement and mortar mixers, and air compressors.

Primary inputs are the estimated numbers of each piece of equipment and the length of each construction stage. Construction is anticipated to begin in February 2025 and last approximately 18 months. CalEEMod estimates the required construction equipment for a project based on surveys, performed by the South Coast Air Quality Management District and the Sacramento Metropolitan Air Quality Management District of typical construction projects, which provide a basis for scaling equipment needs and schedule with a project's size. Air emission estimates in CalEEMod are based on the duration of construction phases; construction equipment type, quantity, and usage; grading area; season; and ambient temperature, among other parameters. Project emissions were modeled for the following stages: demolition, site preparation, grading, building construction/ architectural coatings, and paving. CalEEMod default construction equipment and usage were modeled. The project would require the export of approximately 7,600 CY dirt. Table 2 summarizes the modeled construction parameters.

Table 2 Construction Parameters								
	Phase Duration							
Construction Phase	(Days)	Equipment ¹	Amount	Hours per Day				
Site Preparation	10	Rubber Tired Dozers	3	8				
	10	Tractors/Loaders/Backhoes	4	8				
		Excavators	2	8				
Grading	30	Grader	1	8				
		Rubber Tired Dozer	1	8				
		Scrapers	2	8				
		Tractors/Loaders/Backhoes	2	8				

Table 2 Construction Parameters								
	Phase Duration	F	A					
Construction Phase	(Days)	Equipment ¹	Amount	Hours per Day				
		Crane	1	7				
		Forklifts	3	8				
Building Construction	300	Generator Set	1	8				
		Tractors/Loaders/Backhoes		3	7			
		Welder	1	8				
		Pavers	2	8				
Paving	20	Paving Equipment	2	8				
		Rollers	2	8				
Architectural Coatings	20	Air Compressor	1	6				
SOURCE: CalEEMod Outp	out, Attachment 2 in A	opendix A.						

Construction activities would be subject to several control measures per the requirements of the County, SDAPCD rules, and California Air Resources Board (CARB) Airborne Toxic Control Measures. The following required control measures have been incorporated into the calculations of construction emissions:

- Per the County's Standard Mitigation and Project Design Consideration Grading, Clearing and Watercourses Ordinance Section 87.428, the applicant shall implement one or more of the following measures during all grading activities:
 - Water actively disturbed surfaces three times a day.
 - Apply non-toxic soil stabilizers to inactive, exposed surfaces when not in use for more than 3 days. Non-toxic soil stabilizers should also be applied to any exposed surfaces immediately (i.e., less than 24 hours) following completion of grading activities if the areas would not be in use for more than 3 days following completion of grading.
 - o Remove soil track-out from paved surfaces daily or more frequently as necessary.
 - o Minimize the track-out of soil onto paved surfaces by installation of wheel washers.
- Per SDAPCD Rule 67, the applicant shall use regulated coatings for all architectural coating activities.
- Per CARB's Airborne Toxic Control Measure 13 (California Code of Regulations Chapter 10 Section 2485), the applicant shall not allow idling time to exceed 5 minutes unless more time is required per engine manufacturers' specifications or for safety reasons.

Table 3 presents the total projected construction maximum daily emission levels for each criteria pollutant. As shown in Table 3, emissions related to construction of the project would be below the applicable screening level thresholds. Note that the emissions summarized in Table 3 are the maximum emissions for each pollutant that could occur during each phase based on all modeled construction equipment (see Table 2) being active on the same day. Actual construction activities would vary day to day, with all equipment active on some days, and less equipment active on other days depending on the construction task. Therefore, these are the maximum emissions that could occur in a day. As shown in Table 3, maximum construction emissions would not exceed the County's SLTs for any criteria pollutants. Furthermore, project construction would be limited and would last for approximately 18 months. No mass grading would be required, and standard construction equipment would operate at any given time, depending on the stage of construction as outlined in Table 2 above. 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. Consequently, project construction would have a less than significant impact to public health. 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.

Table 3 Summary of Maximum Construction Emissions (pounds per day)								
Pollutant								
	ROG	ROG NO _X CO SO _X PM ₁₀ PM _{2.5}						
Site Preparation	4	40	36	<1	22	12		
Grading	4	41	34	<1	12	5		
Building Construction	2	13	17	<1	1	1		
Paving	1	8	11	<1	1	<1		
Architectural Coatings	33 1 2 <1 <1 <1							
Maximum Daily Emissions 33 41 36 <1 22 12								
County Screening Level Thresholds	75	250	550	250	100	55		

Operational Emissions

The project would include the construction of a self-storage facility, leasing office, RV parking, a public trail, and associated parking and roadway improvements.

Mobile source emissions would originate from traffic generated by the project. Area source emissions would result from landscaping activities, consumer products, as well as the application of architectural coatings as routine maintenance. Energy source emissions generally occur from natural gas heating. However, the project would be all-electric and would not include natural gas sources of emissions. Additionally, the main storage building would include the installation of a 160 kW solar array on top of the building roof. As a conservative analysis, the emissions calculations did not include reductions due to all-electric development and the installation of solar. The CalEEMod output files are contained in Attachment 2 of Appendix A. Table 4 presents daily operational emissions and would not exceed the 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. 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.

Table 4 Summary of Project Operational Emissions (pounds per day)						
Pollutant						
Source	ROG	NOx	CO	SOx	PM ₁₀	PM _{2.5}
Area Sources	4	<1	6	<1	<1	<1
Energy Sources	<1	<1	<1	<1	<1	<1
Mobile Sources	1	1	6	<1	<1	<1
Total	5	1	12	<1	<1	<1
County Screening Level Thresholds	75	250	550	250	100	55

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 1 above. Based on a review of the cumulative project list (see - 34 -

Table 8), none of the projects identified in the cumulative project list are located close enough or would involve construction that could contribute to a cumulatively significant impact related to construction emissions. The closest projects are between 0.12 and 0.29 miles away and are minor deviation projects which do not involve any substantial construction activities. In addition, the project's operational emissions are below the significance thresholds 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 Impact
 - □ Less Than Significant With Mitigation □ No Impact Incorporated

Discussion/Explanation:

Air quality regulators typically define sensitive receptors as schools (preschool–12th grade), hospitals, resident care facilities, day-care centers, or other facilities that may house individuals with health conditions that would be adversely impacted by changes in air quality. However, for the purposes of CEQA analysis in the County, the definition of a sensitive receptor also includes residents, which are in the vicinity of the project site. Sensitive receptors near the project site include residential uses to the south and west. The closest sensitive receptors are residential uses located to the south approximately 40 feet from the 4.99-acre MUP boundary.

Less than Significant Impact: The two primary emissions of concern regarding health effects for land development projects are diesel particulate matter (DPM) and CO. Projects that would site sensitive receptors near potential CO hotspots or would contribute vehicle traffic to local intersections where a CO hotspot could occur would be considered as having a potentially significant impact. The Transportation Assessment Memorandum (see Appendix B) prepared an analysis of the unsignalized intersection of Quarry Road and Sweetwater Road. The existing Level of Service (LOS) for this intersection is B. With implementation of the proposed project, this intersection would remain unsignalized, and would operate at LOS B or C, and peak-hour trips would be less than 2,000 average daily trips (ADT). Based on these intersection volumes, the project would not cause roadway intersections to fail or result in CO hotspots.

Projects that would result in exposure to toxic air contaminants (TACs) resulting in a maximum incremental cancer risk greater than one in one million without application of best available control technology for toxics, or a threshold of 10 in one million for projects implementing best available control technology for air toxics or a health hazard index greater than one, would be considered as having a potentially significant impact.

Construction of the project would result in the generation of DPM emissions from the use of off-road diesel construction activities and on-road diesel equipment used to bring materials to and from the project site. Generation of DPM from construction projects typically occurs in a single area for a short period. Construction of the project is estimated to occur over an 18-month period. The dose to which the receptors are exposed is the primary factor used to determine health risk. Dose is a function of the concentration of a substance or substances in the environment and the extent of exposure that person has with the substance. Dose is positively correlated with time, meaning that a longer exposure period would result in a higher exposure level for the Maximally Exposed Individual. The risks estimated for a Maximally Exposed Individual are higher if a fixed exposure occurs over a longer period of time. According to the Office of Environmental Health Hazard Assessment, health risk assessments, which

determine the exposure of sensitive receptors to toxic emissions, should be based on a 30-year exposure period; however, such assessments should be limited to the period/duration of activities associated with the project (Office of Environmental Health Hazard Assessment 2015). Thus, if the duration of proposed construction activities near any specific sensitive receptor were 18 months, the exposure would be less than five percent (18 months divided by 30 years) of the total exposure period used for health risk calculation. Furthermore, the project would implement the required construction BMPs and would be conducted in accordance with CARB regulations. Specifically, the project would implement the following Best Available Control Technology for Toxics measures during construction:

- The construction fleet shall use any combination of diesel catalytic converters, diesel oxidation catalysts, diesel particulate filters and/or utilize CARB/U.S. EPA Engine Certification Tier 3 or better, or other equivalent methods approved by the CARB.
- The engine size of construction equipment shall be the minimum size suitable for the required job.
- Construction equipment shall be properly tuned and maintained in accordance with the manufacturer's specifications.
- Per CARB's Airborne Toxic Control Measures 13 (California Code of Regulations Chapter 10 Section 2485), the applicant shall not allow idling time to exceed 5 minutes unless more time is required per engine manufacturers' specifications or for safety reasons.

Due in part to the limited time of exposure, project construction is not anticipated to create conditions where the probability is greater than 10 in one million of contracting cancer for the Maximally Exposed Individual or to generate ground-level concentrations of noncarcinogenic TACs that exceed a Hazard Index greater than 1 for the Maximally Exposed Individual. Additionally, with ongoing implementation of U.S. Environmental Protection Agency (EPA) and CARB requirements (see the aforementioned BMPs) for cleaner fuels, off-road diesel engine retrofits, and new low-emission diesel engine types, the DPM emissions of individual equipment would be substantially reduced. Consequently, DPM generated during construction would not result in the exposure of sensitive receptors to substantial pollutant concentration. Therefore, the project would not expose sensitive receptors to substantial pollutant concentrations, and impacts would be less than significant.

In addition, implementation of projects listed in Section XXI.b) could have the potential to result in CO hot spots because of increased congestion; however, air emissions from project operation, including emissions of CO, would be well below significance thresholds. The overall net vehicle trips associated with the project would be minimal (see above). In addition, construction of cumulative projects similar to the proposed project could result in the generation of construction related TAC emissions that could pose or contribute to a health risk. Projects listed in Section XXI.b) would be required to comply with applicable regulations and implement any required mitigation measures. Therefore, the project, together with other cumulative projects, would not result in a cumulatively considerable impact related to sensitive receptors.

- 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 □ No Impact Incorporated

- 36 -

Discussion/Explanation:

Less than Significant Impact: SDAPCD Rule 51 (Public Nuisance) and California Health & Safety Code, Division 26, Part 4, Chapter 3, Section 41700 prohibit the emission of any material that causes nuisance to a considerable number of persons or endangers the comfort, health, or safety of the public. Projects required to obtain permits from SDAPCD, typically industrial and some commercial projects, are evaluated by SDAPCD staff for potential odor nuisance, and conditions may be applied (or control equipment required) where necessary to prevent occurrence of public nuisance.

During construction, diesel equipment may generate some nuisance odors. Similarly, paving and architectural coating activities would generate odors. Sensitive receptors near the project site include residential uses located to the south and west, the closest being 40 feet to the south of the project MUP boundary; however, any exposure to odors associated with project construction would be short term and temporary in nature.

The CARB Air Quality and Land Use Handbook (CARB 2005) identifies a list of the most common sources of odor complaints received by local air districts. Land uses typically considered associated with odors include wastewater treatment facilities, waste-disposal facilities, or agricultural operations. The project does not include the construction or operation of heavy industrial or agricultural uses that are typically associated with odor complaints. There would be no permanent or operational source of odors associated with the project. Impacts would be less than significant.

Moreover, the effects of objectionable odors are localized to the immediate surrounding area and would not contribute to a cumulatively considerable odor. A list of past, present, and future projects within the surrounding area were evaluated (see Section XXI.b) and none of these projects are land uses typically associated with odors and are therefore not expected to create objectionable odors.

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?
 - D Potentially Significant Impact
- □ Less than Significant Impact
- Less Than Significant With Mitigation
 Incorporated
 No Impact

Discussion/Explanation:

RECON prepared a Biological Resources Letter Report evaluating potential impacts associated with the project (Appendix C). RECON conducted a site visit on August 10, 2021, that covered the entire 10.74-acre project site. RECON conducted records searches of the California Natural Diversity Data Base and California Native Plant Society Online Inventory of Rare and Endangered Plants. In addition, a Crotch's bumble bee (*Bombus crotchii*) habitat assessment was conducted on June 1, 2023.

Less than Significant with Mitigation Incorporated: The Multiple Species Conservation Program (MSCP) breaks habitats up into tiers, including Tiers I, II, III, and IV, with the most sensitive habitats included within Tier I, and Tier IV containing lands which do not support natural vegetation (disturbed, agriculture, and eucalyptus woodland).

- 37 -

Vegetation Community Impacts

As described in the Biological Resources Letter Report (see Appendix C), the following vegetation communities can be found within the 10.74-acre project site:

- Diegan Coastal Sage Scrub (0.94 acre), MSCP Tier II: Diegan coastal sage scrub occurs in the eastern portion of the survey area, with the majority occurring just off-site to the east (Figure 8). A portion of the Diegan coastal sage scrub is disturbed, with evidence of soil disturbance and dumping. These areas of disturbed Diegan coastal sage scrub have lower vegetation cover overall, and a higher proportion of non-native species.
- Non-native Grassland (8.34 acres), MSCP Tier III: Non-native grassland is the dominant vegetation community on the project site.
- Non-native Vegetation (0.29 acre), MSCP Tier IV: Within the survey area, non-native vegetation
 is mapped in several patches. Within the project site itself it includes a dense strip of olive trees
 (Olea europaea) and several areas of non-native vegetation consisting of dense patches of
 Peruvian pepper trees (Schinus molle) on a slope to the east of the project boundary. Non-native
 vegetation is characterized as a Tier IV vegetation community because it does not support natural
 vegetation and is, therefore, not considered sensitive.
- Disturbed Habitat (0.55 acre), MSCP Tier IV: Disturbed habitat is mapped along the edges of Quarry Road and where the original home and the majority of the ranch facilities historically existed. Old building foundations, decomposing wooden fencing, building materials, and rock and dirt spoils are present throughout this area. Disturbed habitat is characterized as a Tier IV vegetation community because it does not support natural vegetation and is, therefore, not considered sensitive (County of San Diego 2010a).
- Arundo-dominated Riparian (0.06 acre), no assigned MSCP tier: This vegetation community consists of densely vegetated thicket dominated exclusively by giant reed (*Arundo donax*) in the southeast corner. The Arundo-dominated riparian is a small pocket of a highly invasive and ecologically disruptive species, it has little biological value and would not be considered sensitive per Section 4.2 of the Guidelines for Determining Significance (County of San Diego 2010a). Thus, it is categorized as a Tier IV vegetation community in this analysis (County of San Diego 2010a).
- Urban/Developed (0.56 acre on-site, 0.24 acre off-site), no assigned MSCP tier: Urban/developed land includes paved roads and private residences, including associated landscaping. It provides only minimal habitat value for native species and is considered a Tier IV vegetation community (County of San Diego 2010a).



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	Project Boundary					
	Survey Area					
	Rock Outcrop					
Sensi	tive Plant Observations					
	California Adolphia					
N	San Diego County Viguiera					
0	Singlewhorl Burrobrush					
Sensitive Wildlife Observations						
	Least Bell's Vireo					
•	Coastal California Gnatcatcher					
Crotch Bumble Bee Habitat Assessment						
	High Nectar Abundance (0.775 ac)					
	Moderate Nectar Abundance (0.396 ac)					
	Low Nectar Abundance (0.108 ac)					
Vegetation Community						
	Arundo-dominated Riparian					
	Diegan Coastal Sage Scrub					
	Disturbed Diegan Coastal Sage Scrub					
	Disturbed Habitat					
	Non-native Grassland					
	Non-native Riparian*					
	Non-native Vegetation					
	Urban/Developed					

* occurs only in the 100-foot off-site survey buffer



FIGURE 8 Existing Biological Resources While the project site is 10.74 acres, the MUP area is limited to 4.99 acres, and the total area of disturbance is 9.03 acres. The proposed graded parking lot, RV parking area, self-storage facility, the FMZ and LBZ areas for fuel management, community trails, multi-use pathway, frontage improvements, realignment of Quarry Road and a neighbor's driveway would impact approximately 9.03 acres of the project site, including 8.79 acres on-site and 0.24 acre off-site (Table 5). The remainder of the site would be preserved in a biological open space easement. Specifically, the 1.97-acre open space easement would be placed over the northern portion of the site as a condition of project approval. Vegetation communities within the biological open space easement area are considered avoided and the easement would ensure protection of resources within the easement in perpetuity. In addition, the project would place lodgepole fencing and signage around the easement area and three-wire fencing would be installed along the western boundary abutting Quarry Road to avoid future disturbance. Placement of the remaining undisturbed portion of the site in an open space easement in perpetuity would further reduce the less than significant impact. Total impacts to biological resources located outside the open space easement would include 8.79 acres to sensitive vegetation communities, including 0.94 acre of Diegan coastal sage scrub and 6.41 acres of non-native grassland as shown in Table 5. Impacts to these sensitive vegetation communities would be significant without the implementation of mitigation measures.

	Hab	itat/Vegeta		able 5 unities, Imp	acts, and Miti	gation		
Habitat/ Vegetation Community	MSC P Tier	Existing On-site (acres)	Impacts (acres)ª	Off-site Grading Impacts (acres)	Mitigation Ratio ^b	Mitigation Required (acres)	Impact Neutral Easement (acres) ^c	Open Space Remaining (acres)
Non-native riparian (65000)–off-site buffer only	I				N/A			
Diegan coastal sage scrub (including disturbed; 32500)	II	0.94	0.94		1 <u>.5</u> :1	0.94<u>1.41</u>	<0.01	0
Non-native grassland (42200)		8.34	6.41		0.5:1	3.21	0.09	1.95
Non-native vegetation (11000)	IV	0.29	0.29		N/A			0
Disturbed habitat (11300)	IV	0.55	0.53		N/A			0.02
Arundo-dominated riparian (65100)	d	0.06	0.06		N/A			0
Urban/developed (12000)	d	0.56	0.56	0.24	N/A			0
TOTAL		10.74	8.79	0.24		4.15 <u>4.62</u>	0.09	1.97°

^aThis includes the entire easement for the proposed trail alignment but does not include a small SDG&E easement along the eastern boundary, which is considered to be impact neutral.

^bRatio assumes mitigation will occur on land that meets the criteria for BRCA.

^cExisting SDG&E easement (0.09 acre) that is considered impact neutral.

^dNo assigned MSCP tier.

^eThis includes some manufactured fill slopes that are required to accommodate some of the Quarry Road improvements, which will be landscaped for erosion control.

To reduce significant direct impacts identified in Table 5, the implementation of Mitigation Measure **BIO-1** would be required prior to approval of any plan or issuance of any permit, and prior to use of the premises in reliance of this permit. This mitigation measure requires the purchase of off-site mitigation credits would be required to address project impacts to sensitive vegetation communities. Required mitigation includes 0.941.41 acre of Diegan coastal sage scrub and 3.21 acres of non-native grassland pursuant to the mitigation ratios in Table 5. Credits are anticipated to be purchased from Willow Road Conservation bank, or other County-approved bank. With implementation of Mitigation Measure **BIO-1**, impacts to sensitive vegetation communities would be less than significant.

Additionally, the project could result in significant indirect impacts to adjacent sensitive vegetation communities as a result of dust, chemical and particulate pollution, and introduction of non-native plant species during construction activities. To reduce impacts to adjacent sensitive vegetation communities due to erosion, pollution, and stormwater quality, implementation of Mitigation Measure **BIO-2** would be

required during construction consistent with the County BMP design manual and Watershed Protection Ordinance. With implementation of required avoidance and minimization measures, impacts would be less than significant.

BIO-1 OFF-SITE HABITAT CREDIT PURCHASE

Mitigation is required for the permanent impact to Diegan coastal sage scrub at a 1.5:1 ratio and non-native grassland at a 0:5:1 ratio. Prior to approval of any plan or issuance of any permit, and prior to use of the premises, the project shall purchase 0.94–1.41 acre of Diegan coastal sage scrub and 3.21 acres of non-native grassland from an approved bank. The project shall utilize a County Conservation Bank with Signed Implementing Agreements with the U.S. Fish and Wildlife Service (USFWS) and California Department of Fish and Wildlife (CDFW).

BIO-2 CONSTRUCTION BEST MANAGEMENT PRACTICES

The following avoidance and minimization measures shall be implemented during construction:

- Appropriate Best Management Practices (e.g., silt fence, fiber rolls, drip pans beneath staged equipment) shall be employed during construction activities to prevent the release of chemicals or other substances that are potentially toxic or impactive to native habitats/flora/fauna.
- Water trucks shall be employed to manage the level of fugitive dust on the adjacent habitat.
- Temporary fencing (i.e., silt fencing and/or orange construction fencing) shall be installed along the project boundaries adjacent to native vegetation communities to ensure project activities stay within the designated work area.
- Trash, oil, parking, or other construction/development-related material/activities shall not be allowed outside any approved construction limits.
- All lighting would be designed and installed so that light would be directed away from adjacent habitat areas to the east and north.

Special Status Plant Species

One special status plant species, California adolphia (*Adolphia californica*), was observed within the project site, and two additional species, San Diego County viguiera (*Bahiopsis laciniata*) and singlewhorl burrobush (*Ambrosia monogyra*), were found in the 100-foot off-site survey buffer. A total of 25 California adolphia individuals occur within the project site, but outside of the area of disturbance for the project's 9.03-acre impact footprint; therefore, impacts to the species would be less than significant. The 25 California adolphia individuals are located outside of the area of disturbance for the project and within the area that would be protected by the proposed biological open space easement. As a condition of the project MUP approval, lodgepole fencing and signage around the easement area would be installed and three-wire fencing would be installed along the western boundary abutting Quarry Road, which would further protect these species from inadvertent disturbance.

No special status plant species are located within the 9.03-acre area of disturbance for the project impact footprint. Therefore, impacts to special status plant species would be less than significant.

Special Status Wildlife Species

One special status wildlife bird species, the coastal California gnatcatcher (Tspestxpe\$geprijsvrrge\$ geprijsvrrge), was observed on-site. In addition, another special status wildlife bird species, the least Bell's vireo (*Vireo bellii pusillus*), was detected within the 100-foot off-site survey buffer. Based on the analysis - 41 -

in Biological Resources Letter Report (see Appendix C), an additional four special status wildlife species have moderate potential to occur: Crotch's bumble bee, Belding's orange-throated whiptail (*Aspidoscelis hyperythra beldingi*), red diamond rattlesnake (*Crotalus ruber*), and San Diego black-tailed jackrabbit (*Lepus californicus bennettii*). Details regarding the potential for each species to occur is included in the Attachment 5 of the Biological Resources Letter Report (see Appendix C). Potential impacts to each of these special status species are discussed below.

Coastal California Gnatcatcher

The coastal California gnatcatcher is a federal threatened, state species of special concern, County Group 1, MSCP covered species and was observed in Diegan coastal sage scrub on-site and was conservatively assumed to be nesting. Thus, all of the Diegan coastal sage scrub on-site (0.94 acre) would conservatively be considered occupied. The project would impact 0.94 acre of occupied Diegan coastal sage scrub habitat (Figure 9). This impact would be considered significant. In accordance with the species' conditions for coverage under the MSCP, the impact from loss of occupied habitat would be fully mitigated through purchase of off-site mitigation credits detailed in Mitigation Measure **BIO-1**, which would reduce impacts to this species to less than significant.

Indirect noise impacts to adjacent nesting coastal California gnatcatchers may occur if vegetation clearing, grubbing, grading, or construction occurs during this species' breeding season (March 1 to August 15). Indirect impacts to coastal California gnatcatcher during construction would be considered significant. Implementation of Mitigation Measure **BIO-3** would be implemented prior to any ground disturbing activity to ensure adverse impacts during the breeding season are avoided and indirect impacts to this species would be less than significant.

BIO-3 COASTAL CALIFORNIA GNATCATCHER BREEDING SEASON AVOIDANCE

Prior to any ground disturbance, the project shall implement the following measure:

To avoid impacts to coastal California gnatcatcher, grading, brush clearing, and all other construction on-site shall be conducted outside the breeding season (March 1 to August 15). However, if construction must occur during the breeding season the following actions would be required:

- A qualified biologist shall conduct a pre-construction clearance survey for nesting birds within suitable adjacent habitat to determine whether avian species are nesting within 500 feet of the construction area.
- If coastal California gnatcatcher is detected nesting within 500 feet of the construction boundary, construction activity shall be avoided within 500 feet of the active nest, if possible. If construction must occur within 500 feet of an active nest temporary sound barriers may be required or grading may be restricted in construction areas near the nest site to reduce noise levels. Temporary sound barriers must be placed within the project footprint. In addition, an acoustician shall measure noise levels during construction activities at the edge of the project footprint near the occupied habitat closest to the nest. Generally, noise levels are required by the County to be less than 60 A-weighted decibels hourly average (60 dB[A] L_{eq}]) or the ambient noise level, whichever is greater.
- If no coastal California gnatcatcher are observed nesting within 500 feet of the project boundary, no grading or construction restrictions associated with coastal California gnatcatcher would apply. No restrictions are required for this species outside its nesting season.



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	Project Boundary					
	Survey Area					
	Project Impacts (Including Fuel Management Zone)					
	Neutral Impact Area (SDGE Easement)					
\overline{Z}	Biological Open Space Easement					
	Rock Outcrop					
Sensitive Plant Observations						
	California Adolphia					
	San Diego County Viguiera					
0	Singlewhorl Burrobrush					
Sensit	ive Wildlife Observations					
V	Least Bell's Vireo					
▼	Coastal California Gnatcatcher					
Crotch Bumble Bee Habitat Assessment						
	High Nectar Abundance (0.78 ac)					
ZZZ.	Moderate Nectar Abundance (0.40 ac)					
<i>[</i>]]	Low Nectar Abundance (0.11 ac)					
Vegetation Community						
533	Arundo-dominated Riparian					
	Diegan Coastal Sage Scrub					
	Disturbed Diegan Coastal Sage Scrub					
	Disturbed Habitat					
	Non-native Grassland					
	Non-native Riparian*					
	Non-native Vegetation					
	Urban/Developed					

* occurs only in the 100-foot off-site survey buffer



FIGURE 9 Impacts to Biological Resources

Least Bell's Vireo

Least Bell's vireo (USFWS endangered, CDFW endangered, MSCP covered, County Group 1) was not detected on-site; therefore, no direct impacts are anticipated. However, least Bell's vireo was detected approximately 100 feet off-site to the northeast (see Figure 9) and therefore has the potential to be indirectly impacted by construction noise. If this species relocates to the project site during construction, direct impacts to the least Bell's vireo would be significant. Even if no least Bell's vireo relocate to the project site during construction, indirect impacts to least Bell's vireo due to noise and dust during construction activities would be significant. To reduce potentially significant direct and indirect impacts, implementation of Mitigation Measure **BIO-4** would be implemented required prior to any ground disturbance.

BIO-4 LEAST BELL'S VIREO BREEDING SEASON AVOIDANCE

To avoid impacts to least Bell's vireo grading, brush clearing, and all other construction within 500 feet of the suitable riparian habitat shall be conducted outside the breeding season (March 15 to September 15). However, if construction must occur during the breeding season the following actions would be required:

- A qualified biologist shall conduct a pre-construction clearance survey for this species within suitable adjacent habitat to determine if it is nesting within 500 feet of the construction area.
- If least Bell's vireos are nesting within 500 feet of the construction boundary, construction activity should be avoided within 500 feet of the nest, if possible. If construction must occur within 500 feet of an active nest temporary sound barriers may be required or grading may be restricted in construction areas near the nest site to reduce noise levels. Temporary sound barriers must be placed within the project footprint. In addition, an acoustician shall measure noise levels during construction activities at the edge of the project footprint near the occupied habitat closest to the nest. Generally, noise levels are required by the County to be less than 60 dB(A) L_{eq} or the ambient noise level, whichever is greater.
- If least Bell's vireo is not detected observed nesting within 500 feet of the project boundary, no grading or construction restrictions associated with this species would apply. No restrictions are required for this species outside its nesting season.

Crotch's Bumble Bee

Crotch's bumble bee (State candidate for listing as endangered) has moderate potential to occur on the project site. A habitat assessment identified potentially suitable habitat (i.e., nectar plants) on-site. Direct impacts to this species would be considered significant and would require mitigation. To reduce potentially significant direct and indirect impacts, Mitigation Measure **BIO-5** would be implemented prior to any ground disturbance associated with the project.

BIO-5 CROTCH'S BUMBLE BEE AVOIDANCE

Prior to any ground disturbance, the project shall implement the following measure:

 Within one year prior to vegetation removal and/or grading, and prior to the issuance of grading permits, a qualified entomologist/biologist with appropriate handling permits and is familiar with the species behavior and life history, shall conduct focused surveys to determine the presence/absence of Crotch's bumble bee. Focused surveys shall follow CDFW's Survey Considerations for California Endangered Species Act Candidate Bumble Bee Species (CDFW) 2023). Focused surveys shall also be conducted throughout the entire project site during the colony active period between April 1 and August 31. The survey protocol, including the qualifications of the surveyor, will be submitted to CDFW for review prior to the initiation of surveys. Survey results, including negative findings, shall be submitted to CDFW and the County prior to implementing project-related ground-disturbing activities. At minimum, a survey report shall provide the following:

- a description and map of the survey area, focusing on areas that could provide suitable habitat for Crotch's bumble bee (overwintering, nesting, and foraging habitat);
- field survey conditions that shall include name(s) of qualified entomologist(s) and brief qualifications; date and time of survey; survey duration; general weather conditions; survey goals, and species searched;
- map(s) showing the location of observations, including nests/colonies; and,
- a description of physical (e.g., soil, moisture, slope) and biological (e.g., plant composition) conditions where each nest/colony is found. A sufficient description of biological conditions, primarily impacted habitat, shall include native plant composition (e.g., density, cover, and abundance) within impacted habitat (e.g., species list separated by vegetation class; density, cover, and abundance of each species).
- If the survey protocol included capture or handling of bumble bees, then the Qualified Biologist shall obtain the required authorization via a Memorandum of Understanding or Scientific Collecting Permit pursuant to CDFW Survey Considerations for California Endangered Species Act Candidate Bumble Bee Species (CDFW 2023). Survey methods that involve lethal take of species are not acceptable.
- If the focused surveys identify Crotch's bumble bee individuals on-site, the Qualified Biologist shall notify and consult with CDFW to determine whether project activities would result in impacts to Crotch's bumble bee, in which case an Incidental Take Permit (ITP) may be required. If an ITP is required, it shall be obtained prior to issuance of Grading Permit, Demolition Plans/Permits and Building Plans/Permits and all necessary permit conditions (including compensatory mitigation) shall be fulfilled prior to initiation of project activities. Take of any endangered, threatened, candidate species that results from the project is prohibited, except as authorized by State law (California Fish and Game Code §§ 86, 2062, 2067, 2068, 2080, 2085; California Code of Regulations, Title 14, § 786.9) under the California Endangered Species Act.
- Survey data shall be submitted by the Qualified Biologist to the California Natural Diversity Database in accordance with the Memorandum of Understanding with CDFW, or Scientific Collecting Permit requirements, as applicable.

Other Special-Status Species

Belding's orange-throated whiptail, San Diego black-tailed jackrabbit, and the red diamond rattlesnake have a moderate potential to occur throughout the project site as detailed in Attachment 5 of the Biological Resources Letter Report (see Appendix C). These species are not State or Federally listed species; however, Crotch's bumble bee is a State candidate for listing as endangered. Belding's orange-throated whiptail, San Diego black-tailed jackrabbit, and the red diamond rattlesnake are CDFW species of special concern and County Group 2 species. Since the project would remove suitable habitat for these species, impacts would be considered significant. Consistent with the County of San Diego MSCP Subarea Plan, habitat-based mitigation is required to address potential impacts to these species.

species would be mitigated to below a level of significance through the habitat-based compensation required for the impacts to Diegan coastal sage scrub and non-native grassland pursuant to Mitigation Measure **BIO-1**.

Raptors

The majority of the project site provides potential raptor foraging habitat. Impacts to raptor foraging habitat are considered significant and require mitigation (County of San Diego 2010b). These impacts would be mitigated to below a level of significance through the habitat-based compensation for impact to Diegan coastal sage scrub and non-native grassland pursuant to Mitigation Measures **BIO-1**.

Nesting Birds

Suitable habitat for tree-nesting raptor species is present within and adjacent to the project site. Therefore, direct impacts and indirect noise impacts would be significant if initial grading and construction occurs during the raptor breeding season. To reduce potentially significant direct and indirect impacts, Mitigation Measure **BIO-6** would be implemented prior to any ground disturbance.

BIO-6 TREE NESTING RAPTOR BIRD AVOIDANCE

- If construction occurs during the raptor breeding season of January 15 through July 15, a qualified biologist shall conduct a pre-construction clearance survey for nesting raptors in suitable nesting habitat (e.g., mature trees within southern willow scrub or eucalyptus woodland) that occurs within 500 feet of the project boundary. If any active raptor nest is located, a 500-foot buffer zone or other appropriate buffer determined by the qualified biologist, would be delineated.
- If project activities must occur within this designated 500-foot buffer zone, the following steps are proposed to avoid impacts to tree-nesting raptors. Prior to implementing these steps, the applicant shall consult with the County and Wildlife Agencies for concurrence.
 - The qualified biologist shall monitor nesting activity daily until project activities are no longer occurring within the designated buffer zone or until fledglings become independent of the nest.
 - The monitoring biologist shall halt construction activities if he or she determines that the construction activities are disturbing or disrupting the nesting activities.
 - The monitor shall make recommendations to reduce the noise or disturbance in the vicinity of the nest. This may include recommendations such as (1) turning off vehicle engines and other equipment whenever possible to reduce noise, and/or (2) working in other areas until the young have fledged.
 - If the biologist determines that nesting activity does not appear to be disturbed by project activities, construction may continue with daily monitoring by a qualified biologist to provide guidance until the fledglings are independent of the nest.

In addition, implementation of cumulative projects listed in Section XXI.b) could have the potential to result in impacts to species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations or by the CDFW or USFWS. All projects would be required to comply with applicable regulations and implement any required mitigation measures which would ensure avoidance of cumulative impacts. Therefore, the project, together with other cumulative projects, would not result in a cumulatively considerable impact related to candidate, sensitive, or special status 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?
 - Detentially Significant Impact
- □ Less than Significant Impact

No Impact

Less Than Significant With Mitigation

Discussion/Explanation:

Less than Significant Impact With Mitigation Incorporated: The project would impact 0.94 acre of Diegan coastal sage scrub and 6.41 acres of non-native grassland, which would be mitigated through purchase of compensatory mitigation credits as detailed in Section IV.a) pursuant to Mitigation Measure **BIO-1**. The project would not impact any riparian habitat as the Arundo dominated riparian vegetation would be avoided and protected within the on-site biological open space easement that would be made as a condition of approval. Impacts to riparian habitat or other sensitive natural vegetation communities would be mitigated to below a level of significance through habitat-based compensation required for the impacts to Diegan coastal sage scrub and non-native grassland described above pursuant to Mitigation Measure **BIO-1**.

In addition, implementation of projects listed in Section XXI.b) could have the potential to result in impacts to riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations or by the CDFW or USFWS. All projects would be required to comply with applicable regulations and implement mitigation measures. The project would result in a less than significant impact. Therefore, the project, together with other cumulative projects, would not contribute to a cumulatively considerable impact related to riparian habitat or other sensitive natural community.

- c) Have a substantial adverse effect on state or 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 Impact

 □
 Less Than Significant With Mitigation Incorporated
 □
 No Impact

Discussion/Explanation:

Less Than Significant Impact: As there are no jurisdictional wetlands or waterways present within the project's impact area of disturbance, no direct impacts to wetland or water resources would occur. However, the Sweetwater River, which occurs approximately 300 feet off-site to the east, and the drainage in the off-site survey buffer to the north are both expected to be waters of the U.S. under U.S. Army Corps of Engineers jurisdiction and waters of the state under CDFW and RWQCB jurisdiction. Indirect impacts (e.g., fugitive dust, chemical/particulate pollution, and non-native plant species introduction) to these potentially jurisdictional features would be prevented through implementation of Mitigation Measure **BIO-2** described in Section IV.a) above. Therefore, indirect impacts to adjacent jurisdictional resources would be less than significant.

In addition, implementation of projects listed in Section XXI.b) could have the potential to result impacts to federally protected wetlands and 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 federally protected wetlands.

- 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 Impact
 - □ Less Than Significant With Mitigation Incorporated No Impact

Discussion/Explanation:

A wildlife corridor can be defined as a linear landscape feature allowing animal movement between two larger patches of habitat. Connections between extensive areas of open space are integral to maintaining regional biodiversity and population viability. In the absence of corridors, habitats become isolated islands surrounded by development. Fragmented habitats support significantly lower numbers of species and increase the likelihood of local extinction for select species when they are restricted to small, isolated areas of habitat. Areas that serve as wildlife movement corridors are considered biologically sensitive.

Wildlife corridors can be defined in two categories: regional wildlife corridors and local corridors. Regional corridors link large sections of undeveloped land and serve to maintain genetic diversity among wide-ranging populations. Local corridors permit movement between smaller patches of habitat. These linkages effectively allow a series of small, connected patches to function as a larger block of habitat and perhaps result in the occurrence of higher species diversity or numbers of individuals than would otherwise occur in isolation. Target species for wildlife corridor assessment typically include species such as bobcat (*Lynx rufus*), mountain lion (*Puma concolor*), and mule deer (*Odocoileus hemionus*).

To assess the function and value of a particular site as a wildlife corridor, it is necessary to determine what areas of larger habitats it connects, and to examine the quality of the corridor as it passes through a variety of settings. High-quality corridors connect extensive areas of native habitat and are not degraded to the point where free movement of wildlife is significantly constrained. Typically, high-quality corridors consist of an unbroken stretch of undisturbed native habitat.

No Impact: Based on an analysis of the County's Geographic Information System (GIS) records, the County's Comprehensive Matrix of Sensitive Species, and Appendix C, it has been determined that the project site does not function as a wildlife movement corridor and there is no indication that the project site supports any wildlife nursery sites. Therefore, 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 Impact
 - Less Than Significant With Mitigation
 Incorporated
 No Impact

- 48 -

Discussion/Explanation:

Less than Significant Impact with Mitigation Incorporated: With the proposed avoidance, minimization, and mitigation measures identified in Section IV.a), the project would not significantly conflict with any local policies or ordinances protecting biological resources or with the provisions of an adopted habitat conservation plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. The project site is located within the South County MSCP Subarea Plan Area. The project site is within the designated Metro-Lakeside-Jamul segment outside of the Pre-Approved Mitigation Area. The land immediately to the north and east of the project site are identified as Take Authorized under the MSCP; however, the project site itself does not have a specific designation. The project and any off-site improvements related to the project are within the boundaries of the MSCP. The project conforms with the MSCP and the Biological Mitigation Ordinance as discussed in the MSCP Findings and Ordinance Compliance Checklist, which outlines further discussion on consistency with any adopted Habitat Conservation Plan, Natural Communities Conservation Plan, other approved local, regional or state habitat conservation plan, including, Habitat Management Plans, Special Area Management Plans, or any other local policies or ordinances that protect biological resources including the MSCP, Biological Mitigation Ordinance, Resource Protection Ordinance, Habitat Loss Permit. Therefore, with the implementation of Mitigation Measures BIO-1 through BIO-4, the project would not conflict with the provisions of any adopted Habitat Conservation Plan, Natural Communities Conservation Plan, or other approved local, regional, or state habitat conservation plan, and impacts would be reduced to less than significant.

See Section XXI.b) for a comprehensive list of the projects considered. Cumulative projects could also result in impacts to biological resources. However, all future projects would be required to comply with all relevant regulations pertaining to impacts to biological resources and implement similar project design features and mitigation measures, as appropriate, to ensure impacts would be less than significant. Therefore, the project's incremental contribution to cumulative biological impacts would not be cumulatively considerable and cumulative biological 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 pursuant to Section 15064.5?
 - Potentially Significant Impact
- ☑ Less than Significant Impact
- □ Less Than Significant With Mitigation □ No Impact □ No Impact

Less than Significant Impact: Based on an analysis of records and a survey of the property by RECON, it has been determined there are one or more historical resources within the project site. A historical resources report, Cultural Resources Survey for the Quarry Road Self-Storage and RV Parking Facility Project (Appendix D), prepared by RECON, evaluated the significance of the historical resources based on a review of historical records including historic maps and aerials, and a field survey of the project site. The survey located one historic resource, CA-SDI-23275 (9891-NDY-1), which consists of the concrete remains of several foundations, cinderblock walls, pathways, and asphalt driveways, as well as a portion of a wooden fence. The resource appears to be a former small-scale ranch complex that consisted of agriculture in the form of orchards and a livery yard. Based on the results of this study, the site did not meet any of the criteria used to identify significant archeological and historical resources based on the County Local Register criteria (see Section 4.1, Appendix D). Because CA-SDI-23275 (9891-NDY-1) was

found to not be significant, the project would not result in a substantial adverse change in the significance of this resource. Therefore, the project would result in a less than significant impact related to a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5. Because the resources are not considered significant historic resources pursuant to CEQA Guidelines Section 15064.5, the loss of these resources would not contribute to a potentially significant cumulative impact.

- 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 Discorporated No Impact

Discussion/Explanation:

Less than Significant With Mitigation Incorporated: The records search described in Section V.a) above identified 5 historic archaeological sites, 22 prehistoric archaeological sites, and 3 multi-component archaeological sites within a one-mile radius of the project. As identified in the Cultural Resources Survey Report for the project (see Appendix D), a portion of one prehistoric resource (P-37-007978) is mapped within the project area but no cultural material was observed during the survey. As designed, the project would impact the previously mapped prehistoric resource P-37-007978; however, the current survey did not observe any cultural material and noted that the previously mapped boundary has suffered surface disturbance from past agriculture and development, thus there is no evidence that this resource still exists on-site. Therefore, this resource is not recommended eligible for purposes of CEQA for listing in the California Register of Historic Resources or the local register and is therefore not a historic archeological resource under CEQA. Project effects to P-37-007978 are therefore considered not significant. However, due to the limited visibility of the project site and the archaeological sensitivity of the area, 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.

CUL-1 ARCHAEOLOGICAL AND TRIBAL MONITORING

In order to mitigate for potential impacts to undiscovered buried archaeological resources and human remains, an Archaeological and Tribal 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).

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

a. 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 will 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.

- b. The Project Archeologist shall provide evidence that a Kumeyaay Native American has been contracted to perform Native American Monitoring for the project.
- c. 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 *[PDS, 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 ARCHAEOLOGICAL AND TRIBAL MONITORING REPORT

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 prior to any occupancy, final grading release, or use of the premises in reliance of this permit. 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:
 - (1) 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.

- (2) 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 the *[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:** The *[PDS, PPD]* shall review the final report for compliance with this condition and the report format guidelines. Upon acceptance of the report, *[PDS, PPD]* shall inform *[PDS, LDR]* and *[DPW, PDC]*, 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]* to release the bond back to the applicant.

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.

In addition, implementation of projects listed in Section XXI.b) could have the potential to result in impacts to the 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.

- c) Disturb any human remains, including those interred outside of *dedicated* 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-approved archaeologist, Carmen Zepeda-Herman (see Appendix D), 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, they 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 the 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 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 With Mitigation Incorporated
- Less than Significant Impact
- No Impact

Discussion/Explanation:

Less than Significant Impact:

Construction-Related Energy Usage

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. 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, and Appendix A. 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, use less energy, and are 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 on-site heavy-duty construction equipment use. Additionally, construction activities would be temporary and short-term and would adhere to all construction 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.

Operation-Related Energy Usage

During operation, energy use would be associated with transportation-related fuel use (gasoline, diesel fuel, and electric vehicles [EVs]), and building-related energy use (electricity). The project would also

include the installation of 160 kW solar array on the roof of the main storage building. Energy use associated with the project was calculated as part of the air quality and GHG modeling detailed in Section III, Section VIII, and Appendix A.

Transportation-Related Energy Use

Buildout of the project and vehicle trips associated with the project would result in transportation energy use. Trips by individuals traveling to and from the project site would result from the use of passenger vehicles. Vehicles would be mostly powered by gasoline, with some fueled by diesel or electricity. The maximum weekday trip rate from the Transportation Analysis (see Appendix B) is 191 trips per day. Based on CalEEMod default trip lengths, the project would generate 573,762 vehicle miles travelled (VMT) annually. The project's parking area would include EV ready spaces and parking spaces with EV charging equipment installed, supporting the use of EVs (see Section VIII). There is no component of the project that would result in unusually high vehicle fuel use during operation. 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.

Non-Transportation-Related Energy Use

Non-transportation 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. 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 on-site 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 Green Building 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 SDG&E. Based on the most recent annual report, SDG&E has already procured 39 percent (California Public Utilities Commission 2021) renewable energy and is on track to procure 60 percent by 2030 as outlined in SDG&E's 2019 RPS Procurement Plan. 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. 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.

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 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. Therefore, impacts would be less than significant. The project would also include the installation of 160 kW solar array on the roof of the main storage building, which would provide a source of renewable energy to the proposed project and would further reduce the less than significant impact.

VII. GEOLOGY AND SOILS

Would the project:

- a) Directly or indirectly cause 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 Impact
 - □ Less Than Significant With Mitigation ⊠ No Impact

Discussion/Explanation:

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. 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 Impact \mathbf{X}
 - Less Than Significant With Mitigation Incorporated

No Impact

No Impact

Discussion/Explanation:

Less than Significant Impact: The project site is located in the seismically active southern California region. To ensure the structural integrity of all buildings and structures, project structures would be designed consistent with seismic requirements of the California Building Code. Compliance with the California Building Code 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 \times
 - Less than Significant Impact
 - Less Than Significant With Mitigation Incorporated

Discussion/Explanation:

Less than Significant Impact: The project site is not within a "Potential Liquefaction Area" as identified in the County's GPU EIR (2011). According to the Preliminary Geotechnical Investigation prepared by Geocon Incorporated (Appendix E), the project site has a low potential for liquefaction due to the dense soils and lack of a high groundwater table. There is undocumented fill scattered throughout the site. particularly in the slope along the western property boundary and stockpiles of concrete rumble, asphalt, soil, and construction materials are present in the northern half of the site. The undocumented fill is unsuitable for supporting structures and improvements and would require complete removal, screening (for trash), and placement as compacted fill during site grading. All recommendations of the Geotechnical Investigation would be implemented during future grading activities as required by the County Grading Ordinance which requires preparation of a soils engineering report and implementation of corrective measures. With a site-specific engineering design and conformance with the Seismic Requirements as outlined in the California Building Code and compliance with the County Grading Ordinance, impacts due to liquefaction would be less than significant.

- iv. Landslides?
 - Potentially Significant Impact
 - Less Than Significant With Mitigation Incorporated
- \times Less than Significant Impact
- No Impact

Discussion/Explanation:

Less than Significant Impact: Site reconnaissance, examination of aerial photographs, and review of available geologic information conducted as a part of the Preliminary Geotechnical Investigation prepared by Geocon Incorporated (see Appendix E) did not identify evidence of landslides on the project site or within the surrounding area. Therefore, the project would not expose people or structures to potential adverse effects from landslides, and impacts would be less than significant.

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

- Potentially Significant Impact \mathbf{X} Less than Significant Impact
- Less Than Significant With Mitigation Incorporated
- No Impact

Discussion/Explanation:

Less than Significant Impact: A Storm Water Quality Management Plan (SWQMP), dated September 19, 2023, was prepared by Kimley-Horn and Associates (Appendix F) consistent with the requirements of the County BMP Design Manual. 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, hydraulic stabilization hydroseeding, silt fencing, fiber rolls, and spill prevention/control measures 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. 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 RWQCB on February 21, 2001; County Watershed Protection, Storm Water Management, and Discharge Control Ordinance (Ord. No. 9424): and County Storm water 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.

- Be located on a geologic unit or soil that is unstable, or that would become unstable as a result c) of the project, and potentially result in an on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?
 - Potentially Significant Impact \mathbf{X} Less than Significant Impact
 - Less Than Significant With Mitigation No Impact Incorporated

Discussion/Explanation:

Less than Significant Impact: The project involves the following grading quantities that would result in the creation of areas of cut and areas underlain by fill: approximately 30,275 CY of cut, 22,200 535 CY of fill, with 7,600 740 CY of export. In order to ensure that any proposed buildings (including those proposed on the project site) are adequately supported (whether on native soils, cut or fill), 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. 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-iv above.

- 57 -

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 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 direct or indirect risks to life or property?
 - □ Potentially Significant Impact ⊠ Less than Significant Impact
 - □ Less Than Significant With Mitigation □ No Impact □ Incorporated

Discussion/Explanation:

Less than Significant Impact: The project is located on expansive soils as defined within Table 18-I-B of the Uniform Building Code (1994) as identified in the Preliminary Geotechnical Investigation (see Appendix E). The soils on-site consist of clay portions of topsoil and completely weathered (Saprolite) portions of metavolcanic rock which may possess "high" expansive characteristics. However, the project would avoid significant impacts through compliance with the improvement requirements identified in the 1997 Uniform Building Code, Division III – Design Standard for Design of Slab-On-Ground Foundations to Resist the Effects of Expansive Soils and Compressible Soils, which ensure suitable structure safety in areas with expansive soils. With implementation of the County Grading Ordinance and recommendations from the soils engineering report, impacts related to expansive soils 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 Impact
 - □ Less Than Significant With Mitigation ⊠ Incorporated
- ⊠ No Impact

Discussion/Explanation:

No Impact: The project would rely on public water and sewer for the disposal of wastewater. As stated in the project description, the project would require annexing into the County Sanitation District. The annexation would be made as a condition of approval to the Major Use Permit and would be required prior to any permits being issued. The project would connect to an existing sewer main within Quarry Road through a proposed 6-inch sewer line in the public right-of-way and a 1.25-inch private force main on private property. 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 Impact
 - Less Than Significant With Mitigation
 Incorporated
 No Impact

Discussion/Explanation:

Impacts on 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 With Mitigation Incorporated: 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. Review of Figure 2.5-3 of the County GPU EIR (County of San Diego 2011a) and the County's Guidelines for Determining Significance for Paleontological Resources identifies the project site being designated as having marginal paleontological sensitivity rating. The Preliminary Geotechnical Investigation (see Appendix E) determined that the 10.74-acre project site is underlain by undocumented fill (qudf), topsoil (unmapped), which are not identified as having high or moderate potential to yield paleontological resources by the County (County of San Diego 2009). The metavolcanic rock that is located on-site is considered marginally sensitive and there is limited potential for resources being discovered on-site. However, there is a possibility of the unanticipated discovery of paleontological resources during ground-disturbing activities as well as the potential to damage or destroy paleontological resources that may be present below the ground surface. Since an impact to paleontological resources does not typically occur until the resource is disturbed, monitoring during excavation is the essential measure to mitigate potentially significant impacts to unique paleontological resources to a level below significance. The project has a marginal potential for containing paleontological resources and would excavate the substratum and/or bedrock below the soil horizons.

Implementation of Mitigation Measure **PALEO-1**, detailed below, would reduce potentially significant impacts to below a level of significance.

PALEO-1 PALEONTOLOGICAL MONITORING

In order to comply with the <u>San Diego County Guidelines for Determining Significance for</u> <u>Paleontological Resources</u>, a Paleontological Monitoring Program shall be implemented throughout grading activities. The project site has marginal levels of sensitive Paleontological resources. All grading activities are subject to the <u>County of San Diego Grading Ordinance Section 87.430</u>, if any significant resources (Fossils) are encountered during grading activities.

a. The grading contractor is responsible to monitor for paleontological resources during all grading activities. If any fossils are found greater than 12 inches in any dimension, stop all grading activities and contact PDS before continuing grading operations.

b. If any paleontological resources are discovered and salvaged, the monitoring, recovery, and subsequent work determined necessary shall be completed by or under the supervision of a Qualified Paleontologist pursuant to the San Diego County Guidelines for Determining Significance for Paleontological Resources.

Upon completion of all grading activities, and prior to Rough Grading Final Inspection (Grading Ordinance SEC 87.421.a.2), a letter report shall be completed as follows:

- a. If no paleontological resources were discovered, submit a "No Fossils Found" letter from the grading contractor to PDS stating that the monitoring has been completed and that no fossils were discovered, and including the names and signatures from the fossil monitors. The letter shall be in the format of Attachment E of the County of San Diego Guidelines for Determining Significance for Paleontological Resources.
- b. If paleontological resources were encountered during grading, a letter shall be prepared stating that the field grading monitoring activities have been completed, and that resources have been encountered. he letter shall detail the anticipated time schedule for completion of the curation phase of the monitoring.

The applicant shall submit the letter report to PDS for review and approval upon completion of all grading activities, and prior to Rough Grading Final Inspection.

With the implementation of PALEO-1, potential impacts to paleontological resources would be less than significant. Furthermore, the project would not result in a cumulative impact to paleontological resources because other projects that require grading in sensitive paleontological resource areas would be required to have the appropriate level of paleontological monitoring and resource recovery. See Section XXI.b) for a comprehensive list of the projects considered. In addition, other projects that propose any amount of significant grading would be subject to the requirements for paleontological monitoring as required pursuant to the County's Grading Ordinance. Individual project compliance with the County Grading Ordinance would ensure that potential significant impacts to paleontological resources resulting from future development would not rise to the level of significance. As such, the project's incremental contribution to cumulative impacts would not be cumulatively considerable and cumulative impacts to paleontology would be less than significant.

VIII. GREENHOUSE GAS EMISSIONS

Would the project:

- Generate greenhouse gas emissions, either directly or indirectly, that may have a significant a) impact on the environment?
 - Potentially Significant Impact \mathbf{X}
 - Less Than Significant With Mitigation Incorporated
- Less than Significant Impact
- No Impact

Discussion/Explanation:

Less than Significant Impact: State CEQA Guidelines Section 15064.4 states that "the determination of the significance of greenhouse gas emissions (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 AB 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, Bay Area Quality Management District (BAAQMD) GHG emissions thresholds were considered for purposes of this analysis. The CEQA Guidelines do not provide numeric or quantitative thresholds of significance for evaluating GHG emissions. Instead, they leave the determination of threshold significance up to the lead agency and provide it the discretion to consider thresholds of significance previously adopted or recommended by other public agencies or experts, provided that the lead agency's decision is supported by substantial evidence (CEQA Guidelines Sections 15064.7[b] and 15064.7[c]). Additionally, any public agency may also use an environmental standard as a threshold of significance, as it would promote consistency in significance determination and integrate environmental review with other environmental program planning and regulations (CEQA Guidelines Section 15064.7[d]).

Based on the specific characteristics of this project including its low VMT generation of approximately 573,762 annually (see Section XVII and Appendix B, Transportation Assessment), current guidance provided by BAAQMD was used to evaluate GHG emissions. For land use development projects, BAAQMD recommends using the approach endorsed by the California Supreme Court in *Center for*

- 61 -

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. Unlike criteria air pollutants or TACs, which have a local and regional impact to ambient air guality, GHGs are pollutants of global concern; therefore, the location of where they are emitted is immaterial. 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 Attachment 1 of Appendix A. 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 would not include natural gas appliances or natural gas plumbing (in both residential and nonresidential development).
 - b) The project would 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 Senate Bill 743 VMT target, reflecting the recommendations provided in the Governor's Office of Planning and Research's (OPR'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 EV requirements in the most recently adopted version of California Green Building Code (CALGreen) Tier 2.

Building Energy Use

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 off-site 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 result in GHG emissions from energy used from the self-storage facility. The project would be designed to run on all-electric energy sources, and the main storage building would include the installation of a 160 kW solar array on top of the building roof. Although not currently enacted as law, the 2022 Scoping Plan calls for all new commercial buildings to have all electric appliances by 2029 (CARB 2022). By designing the project to fully utilize electric energy within self-storage facility, the project would not conflict with ultimate implementation of the 2022 Scoping Plan.

Additionally, the project is not expected to result in the wasteful or inefficient use of energy. All new construction would be required to comply with the energy code in effect at the time of construction, which ensures efficient building construction. 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. GHG emissions associated with electricity use would be eliminated as California decarbonizes the electrical generation infrastructure as committed to by 2045 through SB 100, the 100 percent Clean Energy Act of 2018. Therefore, the project would contribute its "fair share" of what is required to achieve carbon neutrality of buildings by 2045.

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.

The 2022 CALGreen went into effect on January 1, 2023, and the project would be subject to these requirements, at a minimum. The project would meet the 2022 CALGreen Tier 2 voluntary requirements for EV parking detailed in Table A5.106.5.3.2 of the 2022 CALGreen (Title 24, Part 11, CALGreen). The project proposes 21 parking spaces. In accordance with 2022 CALGreen Tier 2 voluntary requirements, the project proposes eight EV capable spaces, three of which are EV capable spaces provided with EV supply equipment. EV capable means a vehicle space with electrical panel space and load capacity to support a branch circuit and necessary raceways, both underground and/or surface mounted, to support EV charging. The three spaces with EV Supply Equipment would include installation of the required branch circuit, EV charging connectors, plugs, and all other apparatus to allow for the transfer of energy between the premises and the EV. Adherence to these Tier 2 voluntary requirements would be required prior to issuance of building permit predicated on sufficient load capacity from SDG&E in the project area.

A VMT evaluation has been prepared for the project as part of the Transportation Assessment Memorandum (see Appendix B). The OPR guidelines outlined in Technical Advisory on Evaluating Transportation Impacts in CEQA note the following: "local-serving retail development tends to shorten trips and reduce VMT. Thus, lead agencies generally may presume such development creates a less-than-significant transportation impact." Locally serving retail/service projects generally improve the convenience of retail close to home and have the effect of reducing vehicle travel. 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 home than currently exist. Therefore, the project is considered a locally serving retail/service project and is considered to have a less than significant impact related to VMT. The project would contribute its "fair share" of what is required to eliminate GHG emissions from the transportation sector by reducing levels of VMT.

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.

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

Π

- Potentially Significant Impact \mathbf{X} 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.

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.

The project was also evaluated for consistency with the San Diego Forward, which is the Regional Transportation Plan/Sustainable Communities Strategy (SCS) that demonstrates how the region would meet its transportation related GHG reduction goals. The project would be consistent with San Diego

Forward as it would not conflict with implementation of its key goals and 5 Big Moves. The 5 Big Moves, that area detailed further in Appendix A, are five main strategies that would result in a more efficient transportation system and consist of: complete corridors, transit leap, mobility hubs, flexible fleets and next operating system. As detailed above, the project would implement 2022 CALGreen Tier 2 voluntary requirements for EV parking, supporting the goal of achieving healthy air and reduced GHG emissions regionwide. Further, project VMT impacts would be less than significant. Therefore, the project would not conflict with the transportation related GHG reduction goals outlined in San Diego Forward.

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

IX. 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 Impact

 □
 Less Than Significant With Mitigation Incorporated
 □
 No Impact

Discussion/Explanation:

The analysis in this section is based on the Phase I and Limited Phase II Environmental Site Assessment (ESA) dated March 17, 2021, prepared by Geocon Incorporated (Appendix G) and the Stockpile Sampling Report, dated November 29, 2022, prepared by Roux Associates, Inc (Appendix H).

Less than Significant Impact: According to the Phase I and Phase II ESA (see Appendix G), several remnant concrete building foundations are present in the central and northern portions of the site. In accordance with the Demolition Plan outlined in the project's plan-set, the project includes removal of trees, concrete pads, signs, fencing and walls located in proximity to the proposed self-storage facility. There are other concrete building foundations located in the northern portion of the site where the biological open space easement is proposed and those are to remain. Additionally, an estimated 1,000 CY of end-dumped undocumented fill piles were located in the northeastern portion of the project site within the area of the proposed biological open space easement. The undocumented fill piles were not assessed as part of our Phase II ESA and a subsequent soil sampling report was prepared to analyze contaminants of concern for disposal or potential off-site/on-site reuse. Based on the Stockpile Sampling Report (see Appendix H), supplemental soil testing was conducted in accordance with the Department of Toxics Substances Control (CTSC) Clean Imported Fill Material Advisory. Five representative samples were collected from the approximately 1,000 CY of material stockpiled at the project site. Laboratory analysis showed that none of the soil samples contained concentrations of any environmental constituents in excess of U.S. EPA's Regional Screening Limits (RSLs) or California Department of Toxic Substance Control and Ecological Risk Office Human Health Risk Assessment Screening Levels for Soil (DTSC SL) for residential soil (with the exception of arsenic, which was below the accepted, naturally occurring background level for California). Therefore, the stockpiled soil can be re-used on- or off-site without restriction. Nonetheless, due to the stockpile's location within the open space easement, the applicant proposes to leave the stockpile soils on-site.

Additionally, the Phase I and II ESA (see Appendix G) identified that the previous agricultural use of the eastern portion of the site was an orchard between the 1940s and 1950s. Limited soil sampling was done as reported in the Phase II ESA, which confirmed pesticides in the soil did not exceed laboratory detection limits. Arsenic was detected in the soils on-site; however, arsenic levels were within typical background concentrations for California soils. There is, however, the potential for unknown buried underground storage, septic tanks, wells, or other site debris which could be uncovered during grading activities. The project would adhere to the County Grading Ordinance which requires work to be halted and materials safely removed in accordance with Section 68.1001.2. of the San Diego County Code of Regulatory Ordinance Title 6, Division 8, Chapter 10. Additionally, pursuant to the project's required construction Stormwater Pollution Prevention Plan (SWPPP), an erosion control plan would be prepared for the project, prior to issuance of grading permits. The erosion control plan would specify erosion control measures that would be implemented to reduce or eliminate the potential for erosion and sedimentation during construction activities.

Project construction may involve the use of small amounts of solvents, cleaners, paint, oils, and fuel for equipment. However, these materials are not acutely hazardous, and use of these common hazardous materials in small quantities would not represent a significant hazard to the public or environment. Additionally, project construction would be required to be undertaken in compliance with applicable federal, state, and local regulations pertaining to the proper use of these common hazardous materials, including the California Occupational Safety and Health Administration and the California Department of Environmental Health Hazardous Materials Division. All site improvements and the driveway connection with Quarry Road would be constructed consistent with all applicable County safety regulations. Operation of the project would not introduce a significant source of hazardous materials on-site. The operation of the self-storage facility would require the storage of cleaning supplies and other related chemicals. However, these materials are not acutely hazardous, and the project would handle and store these materials consistent with all applicable regulations. Landscaping activities including any pesticide or herbicide use would be conducted consistent with applicable regulations.

Therefore, through regulatory compliance and adherence to site-specific plans including the Stockpile Sampling Report and project SWPPP, 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, and 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 Impact
- □ Less Than Significant With Mitigation ⊠ Incorporated
 - ☑ No Impact

Discussion/Explanation:

No Impact: There are no schools located within a quarter mile of the project site. The nearest school is the Sunnyside Elementary School located approximately 1.3 miles south of the project site. Therefore, the project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. No impact would occur.

- 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 Impact
- Less Than Significant With Mitigation
- □ No Impact

Discussion/Explanation:

Less Than Significant Impact: The Phase I and II ESA (see Appendix G) revealed no evidence the project site is included in any of the following lists or databases: the State of California Hazardous Waste and Substances sites list compiled pursuant to Government Code Section 65962.5., the San Diego County Hazardous Materials Establishment database, the County Department of Environmental Health and Quality Site Assessment and Mitigation Case Listing, the Department of Toxic Substances Control Site Mitigation and Brownfields Reuse Program Database ("CalSites" Envirostor Database), the Resource Conservation and Recovery Information System listing, the U.S. EPA's Superfund Comprehensive Environmental Response, Compensation, And Liability Information System database or the U.S. EPA's National Priorities List. Additionally, the project does not propose structures for human occupancy or significant linear excavation within 1,000 feet of an open, abandoned, or closed landfill, is not located on or within 250 feet of the boundary of a parcel identified as containing burn ash (from the historic burning of trash), is not on or within 1,000 feet of a Formerly Used Defense Site and does not contain a leaking Underground Storage Tank. As discussed in Section IX.a), compliance with the Grading Ordinance would require removal of undocumented fill and on-site trash and debris to create a suitable building site consistent with Phase I and Limited Phase II ESA (see Appendix G) and the Stockpile Sampling Report (see Appendix H) recommendations. In the event unknown buried underground storage, septic tanks, wells, or other site debris are found during grading, work would stop and materials would be safety removed in accordance with applicable regulations including but not limited to the requirements of the Grading Ordinance and the project's required construction SWPPP. Therefore, the project would not create a significant hazard to the public or the 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 or excessive noise for people residing or working in the project area?
 - □ Potentially Significant Impact □ Less than Significant Impact
 - □ Less Than Significant With Mitigation ⊠ No Impact Incorporated

Discussion/Explanation:

No Impact: The proposed project is not located within an Airport Land Use Compatibility Plan, 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. No impact would occur.

- e) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?
 - □ Potentially Significant Impact ⊠ Less than Significant Impact
 - □ Less Than Significant With Mitigation □ No Impact Incorporated

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: In San Diego County, there is a comprehensive emergency plan known as the Operational Area Emergency Plan (OAEP). The OAEP 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 the San Diego region's 18 city governments, the County, and several fire protection and water districts who work together to update the region's plan for mitigating the impact of potential disasters. The Multi-Jurisdictional Hazard Mitigation Plan includes hazards present in the jurisdiction, hazard profiles, and vulnerability assessments. The plan also identifies goals, objectives, and actions for each jurisdiction in San Diego County, 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 project would not conflict with the San Diego County Nuclear Power Station Emergency Response Plan 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 project would not conflict with the Emergency Water Contingencies Annex and Energy Shortage Response Plan because it does not propose altering major water or energy supply infrastructure, such as the California Aqueduct.

- 68 -

v. DAM EVACUATION PLAN

Less than Significant Impact: The project is located within the dam inundation zone for the Lake Loveland Dam and the Sweetwater 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 (defined below) that would be difficult to safely evaluate in the event of a dam failure. Unique institutions, as defined by the County 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. Therefore, impacts associated with a dam evacuation plan would be less than significant.

- f) 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
 Less Than Significant With Mitigation
 - Incorporated
- No Impact

Discussion/Explanation:

No Impact: The project would not involve or support uses that allow water to stand for a period of 72 hours (three days) or more (e.g., artificial lakes, agricultural irrigation ponds). The project would not involve or support uses that would produce or collect animal waste, such as equestrian facilities, livestock agricultural operations (chicken coops, dairies, etc.), 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. No impact would occur.

X. 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 Impact
- □ Less Than Significant With Mitigation □ No Impact

Discussion/Explanation:

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, storm water management plans were prepared for the project.

A SWQMP was prepared by Kimley-Horn and Associates (see Appendix F), consistent with the requirements of the County BMP Design Manual. The BMP Design Manual is a design manual for

- 69 -

compliance with local County Watershed Protection Ordinance (Sections 67.801 et seg.) and regional Municipal Separate Storm Sewer Systems Permit (California Regional Water Quality Control Board 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 vegetation stabilization planting, hydraulic stabilization hydroseeding, silt fencing, fiber rolls, and spill prevention/control measures that would preserve water quality. The project would also require a commercial wastewater discharge permit as a condition of annexation to the County Sanitation District. 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. The project would introduce landscaping, which would preserve and stabilize soils in the post-project condition. 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) 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	\mathbf{X}	Less than Significant Impact
Less Than Significant With Mitigation Incorporated		No Impact

Discussion/Explanation:

Less Than Significant Impact: The project would obtain its water supply from the Sweetwater Authority, which obtains water from surface reservoirs or other imported water source. The project would not use any groundwater for any purpose, including irrigation, domestic or commercial demands. 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., one-quarter mile). These activities and operations can substantially affect rates of groundwater recharge. Furthermore, the project incorporates required stormwater BMPs in the form of detention basins and modular wetland systems for treatment and flow control, supporting the underlying groundwater basin. Therefore, no impact to groundwater resources or groundwater management is anticipated.

Moreover, the project would not contribute to a cumulatively considerable impact. 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, 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 Permit as implemented by the San Diego County Jurisdictional Urban Runoff Management Program and Standard Urban Storm Water Mitigation Plan. Therefore, the project's contribution would not be cumulatively considerable.

- c) 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 Impact
- □ Less Than Significant With Mitigation □ No Impact □ No Impact

Discussion/Explanation:

Less than Significant Impact: A Drainage Report (see Attachment 5, Appendix F) and a Preliminary Hydrology and Hydraulics Report (Appendix I) was prepared by Kimley-Horn Associates. The 10.74-acre project site is currently vacant and undeveloped. Under existing conditions, stormwater drains via sheet and surface flow southerly from Quarry Road on the north of the site and into the a nearby creek to the south, leading to Sweetwater River, which conveys flows further into San Diego Bay before discharging into the Pacific Ocean.

Site drainage would remain the same post-construction. The proposed drainage from the building pad and driveway would be collected in a storm drain system that would connect to the storm drain piping located on the southern end of the site. The project would increase the impervious area from 7.2 percent to 55 percent. A series of valley gutters, curb and gutters, drainage inlets, and landscaping would be used to collect and convey runoff to BMPs. The proposed drainage would be split into five drainage areas: four would consist of on-site flows and one would include off-site, public street drainage. The proposed BMPs include a modular wetlands systems for pollution control. Drainage would route to underground detention tanks for hydromodification control. Flows would then be discharged from the tanks to a proposed storm drain line that runs southerly on the eastern end of the site and discharges via a headwall into the existing creek to the south. These BMPs would be designed to meet hydromodification requirements and mitigate the 100-year storm flows to maintain existing drainage patterns.

The SWQMP (see Appendix F) 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. 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 VI.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 □ No Impact □ Incorporated

Less than Significant Impact: As described in Section X.a) above, required BMPs would be implemented consistent with the requirements of the County BMP Design Manual during construction to

control storm flows. As described in Section X.a) above, site drainage would remain the same post-construction. Runoff from the buildings and parking lots would be directed towards a series of valley gutters, curb and gutters, drainage inlets, and landscaping that would be used to collect and convey runoff to BMPs on-site. Compliance with the required NPDES permit would reduce stormwater runoff from the project site by promoting infiltration, minimizing impervious surfaces, and ensuring no net increase in flows over the existing condition through hydromodification processes. 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, 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 substantially increase water surface elevation or runoff exiting the site, as detailed above.

- (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
 □ No Impact

Less than Significant Impact: The project would increase on-site impervious surfaces which could result in additional runoff compared to the existing condition. Drainage from the building pad and driveway would be collected in a storm drain system that would connect to the storm drain piping located on the southern end of the site. Drainage flows would be split into five drainage areas (see Preliminary Water Quality Management Plan, Appendix F). Three of the five drainage areas would drain into modular wetland systems and underground detention systems for treatment of pollutants and flow reduction. Through the on-site drainage systems, the project would not create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems. The proposed BMPs and hydromodification control measures would ensure storm water volumes and velocities leaving the project site would not result in substantial additional sources of polluted runoff. Impacts would be less than significant.

- d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?
 - □ Potentially Significant Impact ⊠ Less than Significant Impact

	Less Than Significant With Mitigation Incorporated		No Impact	
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Less than Significant Impact: As described in the Preliminary Hydrology and Hydraulics Report (see Appendix I), the project is not located within a Federal Emergency Management Agency special flood zone. The project site is located more than 20 miles from the coast; therefore, in the event of a tsunami, 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. However, as described in Section IX.a), 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.

- Conflict with or obstruct implementation of a water quality control plan or sustainable e) groundwater management plan?
 - Potentially Significant Impact Less than Significant Impact \mathbf{X}
 - Less Than Significant With Mitigation No Impact Incorporated

Less than Significant Impact: As described in Section X.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 F) 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. 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.

XI. LAND USE AND PLANNING

Would the project:

- Physically divide an established community? a)
 - Potentially Significant Impact
 - Less Than Significant With Mitigation No Impact П Incorporated

Discussion/Explanation:

Less than Significant Impact: The project would include a self-storage facility and associated parking and loading spaces, RV parking, and a leasing office that would be located within the MUP boundary (a 4.99-acre portion of the 10.74-acre project site). The project would provide access from existing roadways and would not include any features that could physically divide a 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 significantly disrupt or divide the 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 Impact \mathbf{X}
 - Less Than Significant With Mitigation No Impact Incorporated

- Less than Significant Impact
- \mathbf{X}

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 2 (VR-2) Land Use Designation. The project is also subject to the policies of the Sweetwater Community Plan. The property is zoned Rural Residential (RR), which permits self-storage facilities and RV parking with a MUP pursuant to the Zoning Ordinance Section 2185.c.

As stated in the project description, the project requires a LAFCO annexation to add the project site to the County of San Diego Sanitation District service boundaries and sphere of influence to provide sewer services. San Diego LAFCO Policy L-101 supports protection of open space and agricultural lands and includes definitions for each. Appendix A of Legislative Policy L-101 defines open space as any parcel or area of land or water that is substantially unimproved and devoted to an open-space use and designated on a local, regional, or state open space plan as any of the conditions described in (San Diego LAFCO 2021). While the project site is unimproved, it is surrounded on three sides by development and is not designated as open space in the County's General Plan or Zoning Ordinance. Additionally, the site has not been in any agricultural use for over 59 years. Therefore, development of the project site would not conflict with San Diego LAFCO Legislative Policy L-101 related to the protection of open space.

The Sweetwater Community Plan includes a General Goal, "To preserve the Sweetwater Planning Areas unique, natural and cultural resources which support its traditional semi-rural lifestyle." The RCAs as described in Section I.a) are one tool to help preserve sensitive areas as the RCAs define areas where significant community resources are present.

The County has designated several RCAs within the Sweetwater Community Plan Area that represent areas of scenic and/or natural resources value and are intended for long-term preservation. As seen in Figure 10, the project site is located within the Upper Sweetwater River RCA area. The Sweetwater Community Plan (County of San Diego 2014) describes the Upper Sweetwater River RCA as follows:

109. Upper Sweetwater River — Important resources to be conserved in this region include a riparian zone, grasslands, and the sensitive coastal sage scrub plant community. The coastal sage scrub contains several sensitive plants: Coast barrel cactus (*Fecocactus viridescens*), California adolphia (*Adolphia californica*), and Otay tar weed (*Hemizonia conjugens*), and supports populations of Cactus wren, and Black-tailed gnatcatcher, both sensitive bird species. Archaeological sites are also found in this region.

The project demonstrates consistency Sweetwater Community Plan and the Upper Sweetwater River RCA through its evaluation of biological resources and incorporation of required biological resources mitigation measures detailed in Section IV, as summarized below.

As detailed in Section IV. Biological Resources, the project has incorporated mitigation to address all potentially significant biological resource impacts. Mitigation has been identified to offset impacts to 0.94 acre of Diegan coastal sage scrub habitats and 6.32 acres of non-native grassland pursuant to Mitigation Measure **BIO-1**. Mitigation measures have been identified to ensure protection of: (i) indirect impacts to sensitive vegetation communities pursuant to Mitigation Measure **BIO-2**, (ii) special status bird species during the breeding season pursuant to Mitigation Measures **BIO-3** and **BIO-4**, (iii) prevention of inadvertent disturbance to Crotch's bumble bee pursuant to Mitigation Measure **BIO-5**, and (iv) tree-nesting raptors during the breeding season pursuant to Mitigation measures ensures consistency with a number of County plans and policies as detailed in the Ordinance Compliance Checklist.

The project demonstrates consistency with the Sweetwater Community Plan and the Upper Sweetwater River RCA through its evaluation of cultural resources and incorporation of the required cultural resources mitigation measure detailed in Section V, as summarized below. Pursuant to the cultural resources survey completed on-site, there are no remaining significant archaeological sites on the project site based on the site survey. Nonetheless, the project may inadvertently impact undiscovered significant archaeological deposits or features during grading so an archeological and Native American monitor would be present during ground disturbing activities to ensure adverse impacts to archaeological resources are avoided pursuant to Mitigation Measure **CUL-1**. Additionally, a final archaeological and tribal monitoring report would be required as detailed in Mitigation Measure **CUL-2**.

The project's consistency with the visual character of the surrounding area is detailed in Section I, Aesthetics. As discussed therein, the project has been designed for consistency with the Sweetwater Community Plan and prioritizes design elements to ensure the project is compatible with the desired semi-rural character of the surrounding community as detailed in the Sweetwater Community Plan (County of San Diego 2014).

Based on the foregoing, the project would not 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, and impacts would be less than significant.

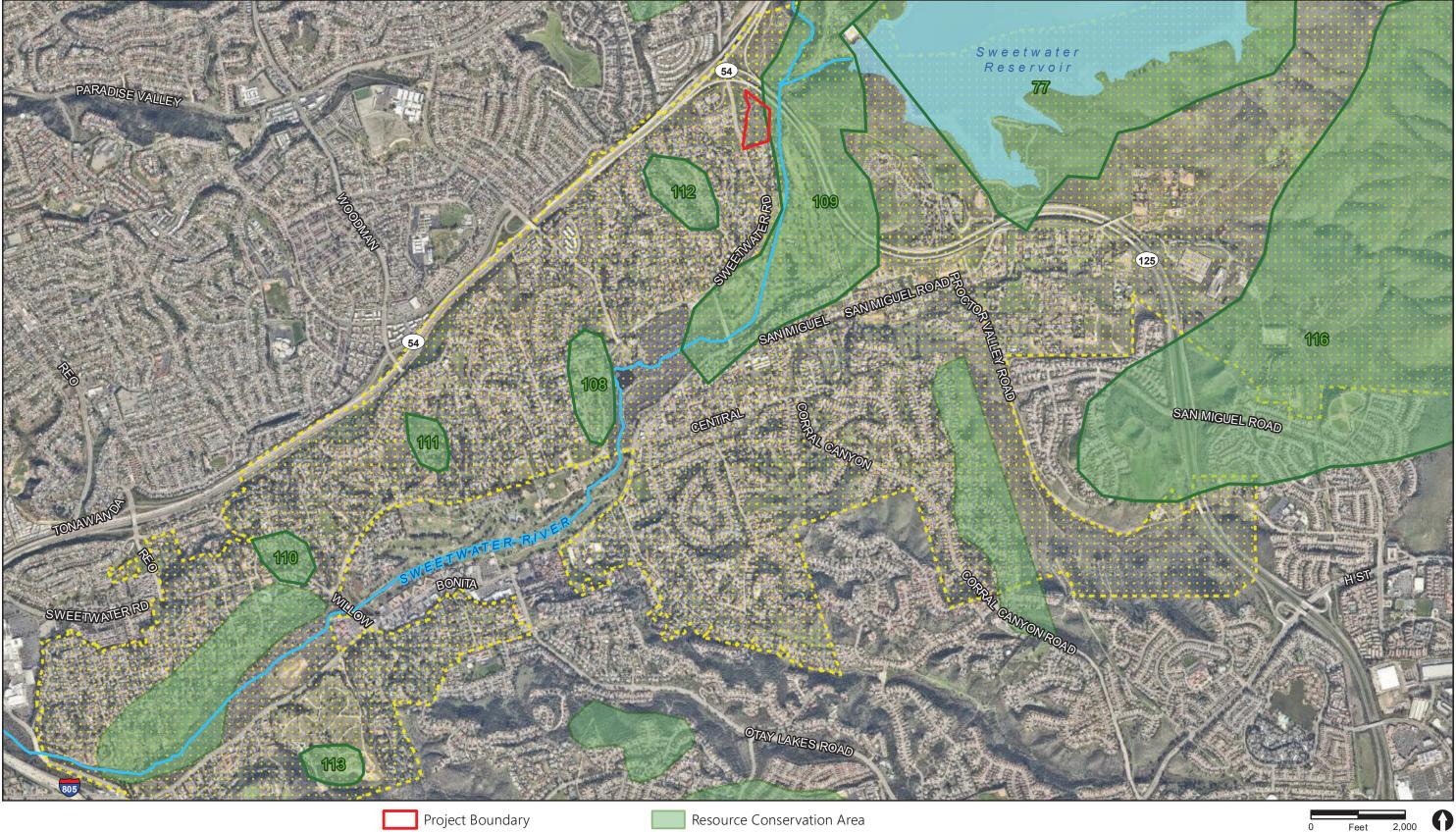
XII. MINERAL RESOURCES

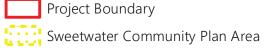
Would the project:

- 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?
 - D Potentially Significant Impact
- Less than Significant Impact
- □ Less Than Significant With Mitigation □ No Impact Incorporated

Discussion/Explanation:

Less Than Significant Impact: There are no known mineral resources on the project site that would be of value to the region and the residents of the state. Review of Figure 2 of the County Guidelines for Determining Significance for Mineral Resources (County of San Diego 2008) shows the project site is situated within an area classified as Mineral Resource Zone 3 (MRZ-3). MRZ-3 areas contain known mineral deposits that may qualify as mineral resource; however, further exploration work would be needed to appropriately classify any mineral resources present. Despite the potential mineral resource designation of the project site, the project site is not, nor has it ever been used for mineral resource extraction. Additionally, the surrounding area has experienced increased urbanization and development of residential land uses which would be incompatible with typical mineral extraction and processing operations. Therefore, while the project would result in the development of land designated MRZ-3, it would not result in the loss of availability of locally important or any known valuable mineral resource as extraction of the site would not be considered compatible with existing surrounding land uses. Further, the project is within close proximity to the Sweetwater Reservoir, which is managed for drinking water and a mining operation would not likely be compatible with the water quality objectives for the reservoir. Impacts to mineral resources would be less than significant.





77: Sweetwater River Floodplain 108: Middle Sweetwater River 109: Upper Sweetwater River 110: Eucalyptus 1 111: Eucalyptus 2 112: Eucalyptus 3 113: Glenn Abby 116: Mother Miguel



- 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 Impact
- □ Less Than Significant With Mitigation ⊠ No Impact

Discussion/Explanation:

No Impact: Review of Figure 3 of the County Guidelines for Determining Significance for Mineral Resources (County of San Diego 2008) determined that the 10.74-acre project site is not delineated as a mineral resource extraction site. Therefore, the project would not 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. No impact would occur.

XIII. 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?
 - Dependentially Significant Impact Dependent Less than Significant Impact
 - □ Less Than Significant With Mitigation □ No Impact Incorporated

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Discussion/Explanation:

The County 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 decibels [dB(A)] for single-family residences (including senior housing, convalescent homes), and 65 dB(A) CNEL for multi-family residences (including mixed-use commercial/residential). Moreover, if the project is excess of 60 dB(A) CNEL or 65 dB(A) 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 of the General Plan Noise Element (County of San Diego 2011b).

Less than Significant Impact: Noise level predictions and contour mapping for construction and on-site noise sources were developed using noise modeling software, SoundPLAN Essential, version 4.1 (Navcon Engineering 2018). SoundPLAN calculates noise propagation based on the International Organization for Standardization method (ISO 9613-2 – Acoustics, Attenuation of Sound during Propagation Outdoors). The model calculates noise levels at selected receiver locations using input parameter estimates such as total noise generated by each noise source; distances between sources, barriers, and receivers; and shielding provided by intervening terrain, barriers, and structures. The model outputs can be developed as noise level contour maps or noise levels at specific receivers. In all cases, receivers were modeled at 5 feet above ground elevation, which represents the average height of the human ear.

- 77 -

Construction

A Noise Analysis was prepared by RECON for the project on February 14, 2024 (Appendix J). As addressed in the analysis, noise associated with project construction would potentially result in short-term impacts to surrounding properties. The 10.74-acre project site is zoned Rural Residential (RR) and is currently undeveloped. The project site is surrounded by residential uses to the south and west (across Quarry Road), the Bonita Golf Course to the southeast, and open space and SR-125 to the east and north. The surrounding properties are zoned RR (Rural Residential) and A70 (Agriculture).

A variety of noise-generating equipment would be used during the construction phase of the project, such as excavators, backhoes, front-end loaders, and concrete saws, along with others. Construction noise levels were conservatively calculated based on three pieces of equipment being active simultaneously. To reflect the nature of grading and construction activities, equipment was modeled as an area source distributed over the project footprint. The total sound energy of the area source was modeled with three pieces of equipment operating simultaneously. Noise levels were modeled at a series of 15 receivers located at the adjacent properties (receiver). The results are summarized in Table 6. Modeled receiver locations and construction noise contours are shown on Figure 11.

Table 6 Construction Noise Levels				
Receiver	Use (Zone)	Construction Noise Level [dB(A) L _{eq}]	Noise Level Limit [dB(A) L _{eq}]	
1	Residential (RR)	66	75	
2	Residential (RR)	67	75	
3	Residential (RR)	67	75	
4	Residential (RR)	68	75	
5	Residential (RR)	68	75	
6	Residential (RR)	63	75	
7	Residential (RR)	70	75	
8	Residential (RR)	71	75	
9	Residential (RR)	71	75	
10	Golf Course (A70)	60		

As shown in Table 6, construction noise levels are not anticipated to exceed 75 dB(A) L_{eq} (equivalent noise level) at the adjacent properties. Although the existing adjacent residences would be exposed to construction noise levels that could be heard above ambient conditions, the exposure would be temporary. Further, blasting is not anticipated for the proposed project; however, should blasting occur, then monitoring would be required if done within 225 feet from an occupied noise sensitive land use. Blasting, if any, shall not exceed 0.1 inch per second (in/sec) peak particle velocity (PPV) at the nearest occupied residence in accordance with County Noise Guidelines Section 4.3. In addition, any and all blasting activities would comply with the requirements of the Sheriff's Department. 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 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.





Construction Noise -60 dB(A) L_{eq} -65 dB(A) L_{eq}

-70 dB(A) L_{eq}

-75 dB(A) L_{eq}

FIGURE 11 **Construction Noise Contours**

Feet

200

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Operations

On-site Noises

The operational noise sources on the project site are anticipated to be those that would be typical of any self-storage facility with RV parking. Based on similar operational uses for self-storage facilities, on-site operational noise sources associated with the project are anticipated to be RVs (idling and brake activity), moving trucks (including back-up signals), and air conditioning units. Using the on-site noise source parameters discussed in the Noise Analysis prepared by RECON (see Appendix J), noise levels were modeled at a series of 10 receivers located at the adjacent properties.

Figure 12 shows the operational noise contours, respectively, along with the modeled receivers and the locations of the noise sources. SoundPLAN data is presented in the Noise Analysis (see Appendix J). Future projected noise levels are summarized in Table 7. As shown, noise levels at the adjacent residential and golf course receivers would range from 38 to 43 dB(A) L_{eq} and would not exceed the applicable noise ordinance limits. Therefore, on-site generated noise would not exceed noise level limits established in the County's Noise Ordinance, and impacts would be less than significant.

Table 7 Operational Noise Levels				
Receiver	Use (Zone)	Operational Noise Level [dB(A) L _{eq}]	Noise Level Limit Daytime/Nighttime [dB(A) L _{eq}]	
1	Residential (RR)	39	50/45	
2	Residential (RR)	40	50/45	
3	Residential (RR)	42	50/45	
4	Residential (RR)	43	50/45	
5	Residential (RR)	43	50/45	
6	Residential (RR)	38	50/45	
7	Residential (RR)	41	50/45	
8	Residential (RR)	42	50/45	
9	Residential (RR)	42	50/45	
10	Golf Course (A70)	40	50/45	

Off-Site Vehicle Traffic

The project was also evaluated to determine if the addition of project-generated trips would result in a significant direct or cumulative increase in noise at nearby noise sensitive land uses. The project would increase traffic volumes on local roadways. Noise level increases would be greatest nearest the project site, which would represent the greatest concentration of project-related traffic. Traffic noise is primarily a function of volume, vehicle mix, speed, and proximity. For purposes of this evaluation, the vehicle mix, speed, and proximity are assumed to remain constant in the future. Consequently, the primary factor affecting noise levels would be increased traffic volumes. The traffic volumes for the existing condition were compared to the existing plus project traffic volumes. Based on the Transportation Assessment prepared for the project (see Appendix B), the existing traffic volume on Sweetwater Road is 8,440 ADT, and, as a conservative worst-case analysis, the project would generate 191 ADT. Typically, a project would have to double the traffic volume on a roadway in order to have a significant direct noise increase of 3 dB or more or to be major contributor to the cumulative traffic volumes. An increase of 191 trips on Sweetwater Road would result in a noise increase of 0.1 dB, which would not be an audible change in noise levels. Additionally, project-only traffic would generate a noise level of approximately 55 CNEL at nearby land uses adjacent to Sweetwater Road. The project would not expose noise sensitive land uses to noise levels in excess of 60 CNEL. Therefore, the project would not result in the exposure of noise sensitive land uses to significant noise levels, and impacts would be less than significant. Moreover, the project would not contribute to a cumulatively considerable exposure of persons or generation of noise levels in excess of standards established in the local general plan, noise ordinance, and applicable standards of other agencies.



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

- Potentially Significant Impact \mathbf{X} Less than Significant Impact
- Less Than Significant With Mitigation Incorporated

- П No Impact

Discussion/Explanation:

Less than Significant Impact: Construction would have the potential to result in varying degrees of temporary ground vibration, depending on the specific construction equipment used and operations involved. Ground vibration generated by construction equipment spreads through the ground and diminishes in magnitude with increases in distance. The effects of ground vibration may be imperceptible at the lowest levels, low rumbling sounds and detectable vibrations at moderate levels, and damage to nearby structures at the highest levels. Vibration perception would occur at structures, as people do not perceive vibrations without vibrating structures.

Human reaction to vibration is dependent on the environment the receiver is in as well as individual sensitivity. For example, vibration outdoors is rarely noticeable and generally not considered annoying. Typically, humans must be inside a structure for vibrations to become noticeable and/or annoving. Based on several federal studies, the threshold of perception is 0.035 in/sec PPV, with 0.24 in/sec PPV being distinctly perceptible (see Appendix J). Neither cosmetic nor structural damage of buildings occurs at levels below 0.1 in/sec PPV. Construction equipment could include equipment such as loaded trucks. excavators, dozers, and loaders. Vibration levels from these pieces of equipment would generate vibration levels with a PPV ranging from 0.035 to 0.089 in/sec PPV at 25 feet. Using a vibration level of 0.089 in/sec PPV as a reference, vibration levels would exceed 0.1 in/sec PPV at distances closer than 25 feet. The closest occupied residential structure is located approximately 50 feet from the project footprint. There are no structures within 25 feet of the construction area. A vibration level of 0.089 in/sec PPV at 25 feet would attenuate to 0.053 in/sec PPV at 40 feet. Vibration levels are not anticipated to exceed 0.1 in/sec PPV.

As described in Section XIII.a), blasting is not anticipated for the proposed project. However, should blasting occur, then monitoring would be required if done within 225 feet from an occupied noise sensitive land use pursuant to the County's Noise Guidelines and the County Noise Ordinance. Each blast, if any, shall be monitored and recorded with an air-blast overpressure monitor and groundborne vibration accelerometer that is located outside the closest residence to the blast. Blasting shall not exceed 0.1 in/sec PPV at the nearest occupied residence, in accordance with County's Noise Guidelines, Section 4.3. Where potential exceedance of the County Ordinance is identified, the applicant shall not continue any blasting activities until a blast drilling and monitoring plan is prepared and submitted to the County, which would identify measures shown to effectively reduce noise and vibration levels (e.g., altering orientation of blast progression, increased delay between charge detonations, presplitting) to be implemented to comply with the noise level limits of the County's Noise Ordinance, Sections 36.409 and 36.410. In addition, any and all blasting activities would comply with the requirements of the Sheriff's Department. All other groundborne vibration impacts would be less than significant; therefore, no further mitigation would be required.

Therefore, vibration due to construction would not be perceptible. The project does not include any operational sources of vibration. Therefore, the project would not expose persons to or generate excessive groundborne vibration or groundborne noise, and impacts would be less than significant.

- 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 Impact
- □ Less Than Significant With Mitigation ⊠ No Impact No Impact

Discussion/Explanation:

No Impact: The project is not located within an Airport Land Use Compatibility Plan 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. No impact would occur.

XIV. 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 Impact

 □
 Less Than Significant With Mitigation
 ☑
 No Impact

 □
 Incorporated
 ☑
 No Impact

Discussion/Explanation:

No Impact: The 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 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, or zone reclassifications. While the project would require annexation to the County Sanitation District, sewer facilities are available in the nearby street and the annexation would not open up new areas for growth. 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 Impact
 - □ Less Than Significant With Mitigation ⊠ No Impact No Impact

Discussion/Explanation:

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

XV. 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
- □ Less than Significant Impact
- ☑ No Impact

Discussion/Explanation:

a.i. Less than Significant Impact. The Bonita-Sunnyside FPD would be responsible for providing fire and emergency medical services to the project site. The Bonita-Sunnyside Fire Station is approximately 2 miles from the project site at 4900 Bonita Road, in Bonita. Based on the service availability forms received from the Bonita-Sunnyside FPD (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 5 minutes.

The implementation of the project would result in a nominal increase in 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 Bonita-Sunnyside FPD. 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 Lemon Grove Station, is at 3240 Main Street, Lemon Grove, approximately 4.5 miles from the project site. The project does not propose uses that typically generate a demand for police protection services, such as a housing 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 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. 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.

XVI. RECREATION

Would the project:

- a) Would the project 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 Impact
 - □ Less Than Significant With Mitigation ⊠ No Impact Incorporated

Discussion/Explanation:

No Impact: The project proposes to construct a self-storage facility with RV parking. The project does not propose any residential uses that may 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) Does the project 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 Impact
 - Less Than Significant With Mitigation Incorporated No Impact

Discussion/Explanation:

Less than Significant Impact with Mitigation Incorporated: The project consists of a self-storage facility with RV parking. The project would enhance the regional trail network by providing public trail improvements on-site. The impacts associated with the proposed recreational trail improvements have been evaluated throughout this Draft IS/MND. Physical impacts associated with recreational trail improvements would involve impacts to non-native grasslands which would be mitigated through an off-site purchase of mitigation credits as detailed in Mitigation Measure BIO-1. Impacts would be less than significant with mitigation incorporated.

- 85 -

XVII. TRANSPORTATION

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
 Mathematical Significant Impact
 - □ Less Than Significant With Mitigation □ No Impact □ No Impact

Discussion/Explanation:

Less than Significant Impact: The County's General Plan identifies standards for maintaining an adequate LOS for County roadways and intersections. To evaluate project consistency with the General Plan Circulation Element, a Transportation Assessment, which includes an LOS analysis, was prepared for the project by Kimley-Horn and Associates (see Appendix B). Although the requirement for the Local Mobility Analysis is not currently in effect based on Board of Supervisors direction that rescinded the County's Transportation Study Guidelines (TSG), it provides useful information to inform the transportation analysis in the absence of updated guidance for transportation analyses. The LOS analysis would be considered by the County's decisionmakers when making General Plan consistency findings for the project. The LOS summary is consistent with County General Plan Policy M-2.1, which requires projects to provide associated road improvements necessary to achieve a LOS D or better on all Mobility Element roads except for those where a failing LOS (E or F) has been accepted by the County. As summarized in Table 8, the Transportation Assessment prepared for the project shows that both the Quarry Road and Sweetwater Road intersection and the Sweetwater Road segment fronting the project site would both function at LOS D or better in the existing and existing with project conditions. Therefore, the project would not conflict with the General Plan policy regarding LOS.

Table 8 Roadway Segment LOS Analysis						
		Roadway	LOS E		V/C	
	Roadway Segment	Classification ¹	Capacity	ADT ²	Ratio ³	LOS ⁴
Existing	Sweetwater Road North	2 Lane Light	16,200	8,440	0.521	D
Conditions	of Quarry Road	Collector				
Existing Plus	Sweetwater Road North	2 Lane Light	16,200	8,631	0.533	D
Project Conditions	of Quarry Road	Collector				
¹ Existing roads street classification is based on the County of San Diego Mobility Element						

²Average Daily Traffic (ADT) volumes for the roadway segments were provided by National Data & Surveying Services

³The volume to capacity (V/C) ratio is calculated by dividing the ADT volume by each respective roadway segment's capacity

⁴LOS = level of service

Project traffic is expected to enter Quarry Road at its intersection with Sweetwater Road. Currently, this intersection operates as a T-intersection with stop-control on Quarry Road and free movements on Sweetwater Road. Quarry Road has one lane in each direction. Sweetwater Road has one lane in each direction and Class II Bike Lanes. There are no turn pockets or turn lanes at the intersection. Project access would be from a new driveway located along Quarry Road. Reconfiguration of the southern end of Quarry Road is proposed to improve the configuration of the Quarry Road approach to Sweetwater Road to widen the intersection angle and bring it into compliance with County public road standards. The project would include improvements to Quarry Road as follows:

- Improve the full width of Quarry Road from Sweetwater Road from 20 feet to 32 feet, north approximately 1,200 feet. The remainder of Quarry Road, north of the full-width improvement to the project driveway would be improved with a half-width 16-foot-wide improvement.
- North of the project driveway, Quarry Road improvements would be limited to pavement tapering to match the existing road surfacing and would include a depressed curb and gutter.

The realignment of the neighbor's driveway as part of the project would be required as result of the frontage improvements and would involve shifting the existing driveway entrance 30 feet to the east to maintain the existing access point along the property line. A 20-foot public trail easement is proposed along Quarry Road and would include the construction of a 10-foot-wide multi-use pathway along the entire project's frontage. Project construction of the 10-foot-wide multi-use pathway in addition to on-site trail improvements would ensure consistency with the Community Trails Master Plan. The project would not conflict with adopted policies, plans, and programs regarding public transit, bicycle, and pedestrian facilities, and impacts would be less than significant.

- b) Would the project conflict or be consistent with CEQA Guidelines Section 15064.3, subdivision (b)?
 - Potentially Significant Impact
- Less than Significant Impact
- □ Less Than Significant With Mitigation □ □
 - No Impact

Discussion/Explanation:

In December 2018, new CEQA guidelines were approved that shifted traffic analysis from delay and operations to VMT when evaluating transportation impacts under CEQA. This change in methodology was a result of SB 743, which changed the way that transportation impacts are analyzed under CEQA. Specifically, SB 743 requires the OPR to amend the CEQA Guidelines to provide an alternative to LOS for evaluating transportation impacts. Particularly within areas served by transit, those alternative criteria must promote the reduction of GHG emissions, the development of multi-modal transportation networks, and a diversity of land uses. CEQA Guidelines Section 15064.3 states that, generally, VMT is the most appropriate measure of transportation impacts, and a project's effect on automobile delay shall not constitute a significant environmental impact. Land use projects that decrease VMT in the project area compared to existing conditions should be presumed to have a less than significant transportation impact. If existing models or methods are not available to estimate the VMT for the particular project being considered, a lead agency may analyze the project's VMT qualitatively. A lead agency has discretion to choose the most appropriate methodology to evaluate a project's VMT. To help clarify the CEQA Guidelines and SB 743, OPR developed the Technical Advisory on Evaluating Transportation Impacts in CEQA (December 2018). The advisory contains technical recommendations regarding assessment of VMT, thresholds of significance, and mitigation measures. The OPR provides this technical advisory as a resource for the public to use at their discretion. The OPR guidelines note the following: "... local-serving retail development tends to shorten trips and reduce VMT. Thus, lead agencies generally may presume

such development creates a less-than significant transportation impact." Locally serving retail/service projects generally improve the convenience of retail close to home and have the effect of reducing vehicle travel.

The Transportation Assessment prepared for the project (see Appendix B) was based on the County's TSG, which were in effect at the time of the analysis but have since been rescinded by the Board. Despite the rescission of the TSG, the VMT analysis demonstrates consistency with requirements of CEQA Guidelines Section 15064.3 as discussed below.

Less than Significant Impact: A Transportation Assessment, which includes a VMT analysis, was prepared for the project (see Appendix B). 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 home than currently exist. Therefore, this project is considered a locally serving retail/service project and would not conflict with and 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 \mathbf{X}
 - Less Than Significant With Mitigation Incorporated
- Less than Significant Impact
- No Impact

Discussion/Explanation:

Less Than Significant Impact: The project would be conditioned to improve Quarry Road along the project's entire frontage from a 20-foot improved width to varying 20-to-32-foot width plus a 10-foot-wide multi-use pathway parallel to Quarry Road. 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 \boxtimes
 - Less Than Significant With Mitigation No Impact Incorporated

Discussion/Explanation:

Less than Significant Impact: The Bonita-Sunnyside FPD, which is the Fire Authority Having Jurisdiction, and the San Diego County Fire Authority, have reviewed the project and associated emergency access roadways and have determined that there is adequate emergency fire access proposed. The project would incorporate a security gate outfitted with a Knox override switch, an optical (strobe) override switch, mechanical disconnect or battery back-up, and equipped with sensor-controlled egress in accordance with California Fire Codes. Additionally, all proposed roads and driveways would be improved to County standards with adequate access for fire and emergency responders. Therefore, the project would not result in inadequate emergency access.

- 88 -

XVIII. 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 Section 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:
 - 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 Section 5020.1(k), or
 - 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 Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the Lead Agency shall consider the significance of the resource to a California Native American tribe.
 - □ Potentially Significant Impact □ Less than Significant Impact
 - □ Less Than Significant With Mitigation ⊠ No Impact Incorporated

Discussion/Explanation:

No Impacts: The County initiated consultation with California Native American tribes traditionally and culturally affiliated with the project site consistent with the requirements of AB 52 on December 10, 2021. The following tribes requested consultation: Barona Group of the Capitan Grande, Jamul Indian Village, San Pasqual Band of Diegueno Mission Indians, Sycuan Band of the Kumeyaay Nation, and the Viejas Band of Kumeyaay Indians. No tribal cultural resources were identified during consultation, and consultation was concluded with all consulting tribes except Sycuan. Requests to conclude consultation with Sycuan were made on June 30 and September 22, 2022, and March 20, September 19, October 30, November 13, and December 20, 2023. To date no response has been received. As such, consultation has concluded due to a lack of response from the tribe. As such, no impacts to tribal cultural resources would occur.

XIX. 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 effects?
 - □ Potentially Significant Impact ⊠ Less than Significant Impact
 - □ Less Than Significant With Mitigation □ No Impact □ Incorporated

- 89 -

Discussion/Explanation:

Service availability forms have been provided which indicate existing services are available to the project from the following agencies/districts: Sweetwater Authority and the San Diego County Sanitation District, Spring Valley service area (see Appendix K).

Less than Significant Impact:

<u>Water</u>

A service availability form has been provided by the Sweetwater Authority (see Appendix K) indicating that no off-site improvements would be required to provide water service to the project site. All water service connections are evaluated as part of the project's impacts footprint throughout this MND. The project would connect to the existing Sweetwater Authority water line along Quarry Road at the project entrance 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 facilities have been evaluated throughout this Draft 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 proposes annexation into the County Sanitation District. The County Sanitation District has indicated adequate capacity is available to serve the project. The project would connect to an existing sewer main within Quarry Road through a proposed 6-inch sewer line in the public right-of-way and a 1.25-inch private force main on private property. Consequently, potential impacts associated with construction of these wastewater facilities have been evaluated throughout this Draft 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 site 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 adjacent pervious areas and dispersed via splash block/riprap and flow spreaders. No changes in the current flowage 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 Draft IS/MND. 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 impacts would be less than significant.

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 Draft 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 □ No Impact □ Incorporated

Discussion/Explanation:

Less Than Significant Impact: The project requires water service from the Sweetwater Authority. A Service Availability Letter from the Sweetwater Authority has been provided, indicating adequate water resources and entitlements are available to serve the requested water resources. Therefore, the project would have sufficient water supplies available to serve the project 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 Impact

 □
 Less Than Significant With Mitigation
 □
 No Impact

Discussion/Explanation:

Less Than Significant Impact: The project requires wastewater service from the County Sanitation District, Spring Valley service area. The project proposes annexation into the County Sanitation District, and this would be made as a condition of approval as part of the MUP and would be required before any permits are issued. 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 Impact
 - □ Less Than Significant With Mitigation □ No Impact □ No Impact

Discussion/Explanation:

Less than Significant Impact: Implementation of the project would generate 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 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 21440 et 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 Impact
- □ Less Than Significant With Mitigation □ No Impact □ No Impact

Discussion/Explanation:

Less than Significant Impact: Implementation of the project would generate 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 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 21440 et seq.). There are five permitted active landfills in the County with remaining capacity.

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's Diversion of Construction and Demolition Materials from Landfill Disposal Ordinance (County of San Diego 2020). The ordinance requires a 65 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 required to submit a Debris Management Permit (C&D Permit) that includes a Debris Management Plan to ensure the project complies with the diversion requirements (County of San Diego 2022).

Operationally, the self-storage managers and the on-site restroom would be the only generators of solid waste from the site. The applicant would contract with the local hauler for a 3 CY dumpster and a 32-gallon recycling container to be picked up once a week. 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:

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 □ No 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. However, the site is in a hazardous wildland fire area and is adjacent to vacant land where wildfires could originate and spread to the developed areas resulting in the need for evacuation. To meet the FPD and the County's fire code requirements, the project includes a 24-foot fire lane access into the property and around the two buildings and includes a Knox override switch for the proposed gate for emergency access. The project also proposes two fire hydrants, a 100-foot FMZ, and a 100-foot LBZ easement between the proposed structures and proposed open space area to the north. The FMZ and LBZ provide defensible space, which creates a separation zone between wildlands and proposed structures, a space where fuel is managed or modified to minimize the spread of fire to the structure and providing space for defending structures from burning vegetation.

Also, a Fire Service Availability Letter, dated September 22, 2021, has been received from the Bonita-Sunnyside FPD. The MUP would include conditions of approval to ensure conformance with the Uniform Fire and Building Codes or Amendments by the FPD to the California Fire Codes including adequate fire sprinkler and alarm systems and a Knox override switch for the electronic security gate. The Fire Service Availability Letter indicates the expected emergency travel time to the project site to be five minutes. The Maximum Travel Time allowed pursuant to the Safety Element is five minutes.

Therefore, based on the location of the project; review of the project by County staff; and through compliance with MUP conditions of approval, the project is not expected to expose people or structures to a significant risk of loss, injury, or death involving hazardous wildland fires and impacts would be less than significant.

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.

- b) Substantially impair an adopted emergency response plan or emergency evacuation plan?
 - □
 Potentially Significant Impact
 ⊠
 Less than Significant Impact

 □
 Less Than Significant With Mitigation
 □
 No Impact

- 93 -

Discussion/Explanation:

Less than Significant Impact: The project is not located in a moderate, high, or very high fire hazard severity zone. However, the site is in a hazardous wildland fire area and is adjacent to vacant land where wildfires could originate and spread to the developed areas resulting in the need for evacuation. However, the project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. The County Emergency Operations Plans guide the integration and coordination within other governmental agencies that are required during an emergency to serve the existing and future public safety needs in the County. The Emergency Operations Plans identify evacuation routes, emergency facilities, and personnel, and describe the overall responsibilities of federal, state, regional, and city entities. The project would be required to meet the mandatory requirements related to the prevention of wildfire impacts including compliance with emergency access design standards as part of new construction of roads to provide sufficient access for emergency equipment.

The project would comply with the International Fire Code; California Fire Code; regulations set forth in Sections 13000 et seq. of the California Health and Safety Code; and Title 14, Division 1.5, of the California Code of Regulations. These codes set standards for road dimension, design, grades, and other fire safety features. The project would also comply with the County Consolidated Fire Code and other County ordinances. Implementation of these fire safety standards would occur during the building permit process. A Fire Service Availability Letter and conditions, dated September 22, 2021, have been received from the Bonita-Sunnyside FPD. The conditions from the FPD require conformance with the Uniform Fire and Building Codes or Amendments by the FPD to the California Fire Codes including adequate fire sprinkler and alarm systems and a Knox override switch for the electronic security gate. The project also includes a requirement of 100 feet of clearing around all structures pursuant to the County Consolidated Fire Code Section 4907.1.2 and the County's Guidelines for Determining Significance for Wildland Fire and Fire Protection (County of San Diego 2010c). Additionally, all proposed roads and driveways would be improved to County standards with adequate access for fire and emergency responders.

The project would be required to comply with the regulations described above to maintain adequate availability of emergency services during an emergency response or an emergency evacuation which would prevent impairment of an adopted emergency response plan or emergency evacuation plan. As a result, the project would not substantially impair an adopted local or countywide emergency response or evacuation plan 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 □ No Impact Incorporated

Discussion/Explanation:

Less than Significant Impact: As detailed above, the project would adhere to all County regulations, fire code standards, and brush management requirements. Therefore, the project would not exacerbate wildfire risks nor expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. 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 two fire hydrants that are proposed for the project site and would be located on the north and south side of the proposed self-storage building. Access to the project site would be provided from Quarry Road via a proposed 30-foot-wide asphalt cement pavement private roadway. Internal circulation would be provided by 35-foot-wide roadways. Road grades would comply with the 2017 County Fire Code fire access roadway standard. A minimum vertical clearance of 13 feet, 6 inches would be maintained for the entire required width of fire access roads. All access and internal road surfaces would consist of asphalt pavement and would be capable of supporting the imposed loads of fire apparatus (not less than 75,000 pounds). All proposed roads would be improved with asphalt concrete and would be maintained to provide a fire buffer as well as to facilitate on-site circulation for emergency vehicles. Consequently, potential impacts associated with construction of these infrastructure improvements have been evaluated throughout this Draft IS/MND. Therefore, project infrastructure would not exacerbate fire risk or result in temporary or ongoing impacts to the environment, and impacts would be less than significant.

- 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 above, the project site is within a hazardous wildland fire area and adjacent to vacant land. Therefore, the natural environment of the project site would be prone to wildfires and downslope or downstream flooding as a result of runoff, post-fire instability, or drainage. The project has been reviewed and approved by the FPD to ensure that the project complies with local, state, and federal standards for land use, zoning, and construction. Adherence to County regulations, and emergency and evacuation plans (including the countywide Multi-Jurisdiction Hazard Mitigation Plan that identifies risks and ways to minimize damage by natural and manmade disasters) would reduce the potential for impacts to people or structures from significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. Therefore, impacts would be less than significant.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE

Would the project:

- a) Have the potential to substantially 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 Incorporated: As described in Section IV.a), implementation of Mitigation Measure BIO-1 would reduce impacts to less than significant to sensitive vegetation communities, implementation of Mitigation Measure BIO-2 would ensure prevention of indirect impacts to sensitive vegetation communities with the applicable Construction Best Management Practices during construction, implementation of Mitigation Measure BIO-3 would reduce impacts related on coastal California gnatcatcher to a level less than significant, implementation of Mitigation Measures BIO-3 and BIO-4 would ensure adverse impacts to least Bell's vireo are avoided, Mitigation Measure BIO-5 would ensure adverse impacts to Crotch's bumble bee are avoided, and BIO-6 would ensure impacts to migratory and nesting birds species would be reduced to a level less than significant. 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 in Section VII.f), implementation of Mitigation Measure **PALEO-1** would reduce impacts to paleontological resources to less than significant. As described throughout the Draft IS/MND, all other project-level impacts would be less than significant without mitigation. Consequently, the project would not result in any project-level significant impacts that could contribute to an existing cumulative impact on the environment. 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	\boxtimes	Less than Significant Impact
Less Than Significant With Mitigation Incorporated		No Impact

Discussion/Explanation:

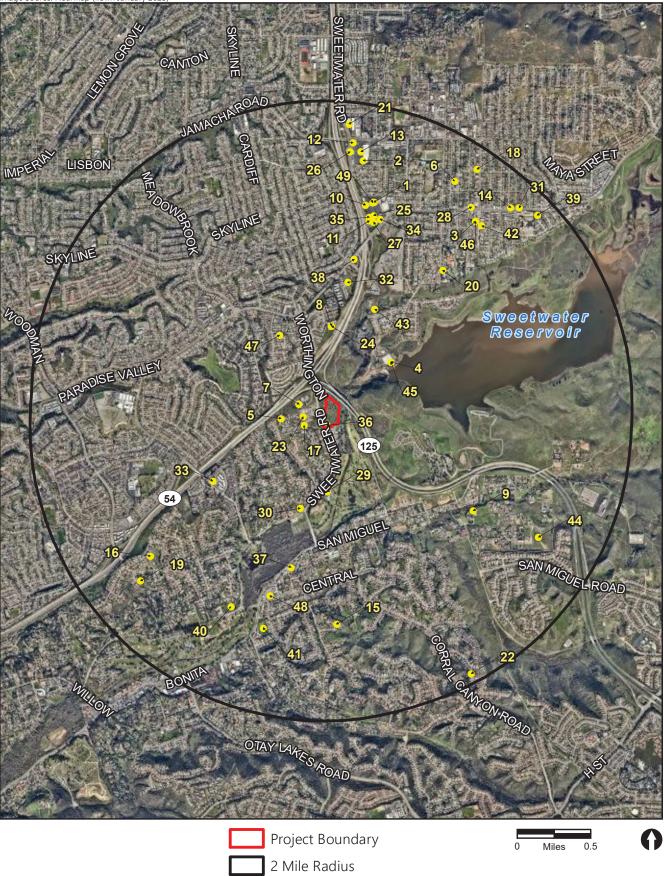
Less than Significant Impact: Cumulative effects were considered throughout this Draft IS/MND. As described in Section III, impacts related to air quality would be less than significant. Air quality is a regional

issue and the cumulative study area for air quality impacts encompasses the SDAB as a whole. Therefore, the cumulative analysis addresses regional air quality plans and policies, such as the RAQS, as well as the project's contribution to a net increase of any criteria pollutant for which the SDAB is listed as a non-attainment area. As described in Section III.b), the project would not result in construction or operational emissions in excess of the applicable significance thresholds for all criteria pollutants. Consequently, the project would not result in an increase in emissions that are not already accounted for in the RAQS, and cumulative impacts would be less than significant. The analysis of GHG emissions in Section VIII is a cumulative analysis by nature as the issue of GHG emissions is a global issue. As detailed therein, the project would not contribute to a cumulatively considerable impact to the global cumulative GHG emissions impact. No cumulative impact would result related to issues of geology and soils, hazards and hazardous materials, or hydrology and water quality because like the project, each individual project would be subject to local and state regulations that ensure impacts related to these issues are avoided.

Cumulative impacts related to aesthetics require consideration of development that may be occurring in the localized area, within the viewshed of the project. Past, present, and reasonably future projects were researched to identify projects that could contribute to a potentially significant cumulative impact. Table 9 includes projects that are either currently in processing with the PDS or were recently approved and may not have been constructed yet. Figure 13 identifies the location of each of these projects by number listed in the table. While there are a number of projects in proximity to the project site, all of the projects are minor deviation projects, which are uses requesting authorization to make minor changes to the existing use (e.g., less than 10 percent change). Changes to the existing condition that would result from minor deviations would be nominal and would not affect the visual environment or result in any substantial change to any environmental issue area.

Project impacts related to biological resources, paleontological resources (Geology and Soils), and Cultural Resources were found to be reduced to less than significant with mitigation. Like the project, future projects would be subject to review to ensure consistency with the County Guidelines for Determining Significance for Biological Resources, Cultural Resources, and Paleontological Resources, and would be subject to tribal consultation requirements. With implementation of these requirements for cumulative projects, a significant cumulative impact to these resources would be avoided.

After review of the reasonably foreseeable cumulative projects in the area, there is no evidence that the project would contribute to a cumulatively considerable impact. The project's contribution to a potential cumulative impact would be less than significant and the project has been determined not to meet this Mandatory Findings of Significance.



• Cumulative Projects

RECON M:\/OBS5\9891\common_gis\fig13_mnd.mxd 01/17/2024 bma FIGURE 13 Cumulative Project List

Table 9				
Cumulative Project List				
#	Project Number	Project Name		
1	PDS2022-STP-98-012W1M9	Big Lot's Spring Valley Wall Signs Minor Deviation		
2	PDS2022-STP-97-050W3M3	Panda and Jersey Mikes - Minor Deviation		
3	PDS2022-STP-18-025M2	La Presa Minor Deviation		
4	PDS2022-MUP-95-031W3M5	Spring Valley Minor Deviation		
5	PDS2022-MUP-84-019M4	Grisel Residence Minor Deviation		
6	PDS2022-MUP-61-118W2M3	SDSAN00101B Minor Deviation		
7	PDS2022-MUP-10-038W1M1	South County Animal Shelter/SD0363 Minor Deviation		
8	PDS2021-ZAP-96-030W1M2	T-Mobile SD06033A Anchor Minor Deviation		
9	PDS2021-ZAP-01-122W1M2	CCI Sunnyside Mr. Morgan #880304 Minor Deviation		
10	PDS2021-STP-98-048M1	RITE AID SWEETWATER SIGNAGE Minor Deviation		
11	PDS2021-STP-98-012W1M8	Valvoline Minor Deviation		
12	PDS2021-STP-97-050W3M2	Chevron Rebrand Minor Deviation		
13	PDS2021-STP-97-050W3M1	Spring Valley Shopping Center Minor Deviation		
14	PDS2021-STP-16-017M1	DAMBERGER AUTOMOTIVE STP DEVIATION Minor Deviation		
15	PDS2021-MUP-81-047W1M6	Abel Ledezma MUP Minor Deviation		
16	PDS2022-MUP-77-	Bonita Minor Deviation		
	099W8M21			
17	PDS2021-MUP-84-019M3	Anglin Project Minor Deviation		
18	PDS2021-MUP-78-044M1	814 Grand Ave New Balcony and Stairs Minor Deviation		
19	PDS2021-MUP-77-	3499 Wallace Drive Bonita CA Keystone Walls and Dec Minor		
	099W6M19	Deviation		
20	PDS2021-MUP-76-085W6M4	Covenant Living at Mt. Miguel Minor Deviation		
21	PDS2021-MUP-19-001M1	Verizon: "Sweet Jam" Minor Deviation		
22	PDS2021-MUP-04-028M4	TMO SD06991A Minor Deviation		
23	PDS2021-MUP-04-002M4	Carriage Hill - Entry Gate Minor Deviation		
24	PDS2020-ZAP-96-030W1M1	Sweetwater Views Condominiums L600/L1900 Minor Deviation		
25	PDS2020-STP-98-012W1M7	T-MOBILE WALL SIGNS - SWEETWATER RD Minor Deviation		
26	PDS2020-STP-97-050W2M1	Spring Valley Shopping Center Minor Deviation		
27	PDS2020-STP-05-009M4	Metro - T-Mobile 8626 Jamacha Minor Deviation		
28	PDS2020-STP-02-046M4	Anchor Minor Deviation		
29	PDS2020-MUP-72-080W3M3	Bonita Golf Course, Major Use Permit Minor Deviation		
30	PDS2022-TPM-21320	Collins 2 Lot SB9 TPM		
31	PDS2022-STP-16-013M2	Arco E85 Site Plan		
32	PDS2022-MUP-22-012	CAL02872 Paradise Valley Road		
33	PDS2021-ZAP-20-002M1	Verizon: Briarwood		
34	PDS2021-STP-94-028W1	McDonalds Spring Valley		
35	PDS2021-STP-21-005	Discount Tire CAS 12222 - Spring Valley		
36 37	PDS2021-MUP-21-009 PDS2020-STP-20-007	Secure Space Self-Storage - Bonita (proposed project) Camara Properties - Bonita Road		
38	PDS2020-51P-20-007 PDS2019-ZAP-19-003	Paradise Valley Gas Station and Mart		
30	PDS2019-ZAP-19-003 PDS2018-STP-18-009	Jamacha Building		
40	PDS2018-51P-18-009 PDS2017-TM-5622	Egson Tentative Map		
40	PDS2017-111-5022 PDS2016-MUP-16-010	Ace Self Storage		
41	PDS2022-STP-22-025	Bumper Collision / Fleet Services		
43	PDS2022-51P-22-025 PDS2022-TPM-21309	Aleman Santiago TPM (SB9-2 Lot)		
44	PDS2022-TFIM-21309 PDS2019-TM-5632	Santoyo TM		
45	PDS2019-110-5052 PDS2023-MUP-95-031W3M6	Spring Valley - Verizon		
40	PDS2023-MOP-95-031773M0 PDS2023-STP-23-015	Grand Avenue STP		
47	PDS2023-TPM-21333	Granite View Lane TPM (SB-9 2-LOT TPM)		
48	PDS2023-STP-18-001M1	Starbucks Bonnie Brae Center		
49 50	PDS2023-STP-18-001M1 PDS2023-STP-98-012W1M10	Chase - Spring Valley		
50		onase - oping valiey		

- c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?
 - □ Potentially Significant Impact ⊠ Less than Significant Impact
 - □ Less Than Significant With Mitigation □ No Impact □ No Impact

Discussion/Explanation:

Less than Significant: The project would not have a significant impact related to any issue areas that could result in adverse effects to human beings either directly or indirectly. Impacts related to air quality and noise would be less than significant and no impact related to geology and soils, hazards and hazardous materials, or hydrology and water quality would occur because the project would comply with local and state regulations that ensure impacts related to these issues are avoided. Compliance with fire codes ensures impacts related to wildfire would be avoided. 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.

- 100 -

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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2023 CDFW's Survey Considerations for California Endangered Species Act Candidate Bumble Bee Species. June 6.

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- 2013 Transportation and Construction Vibration Guidance Manual. September.
- 2019 California State Scenic Highway Mapping System. <u>https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=2e921695c43643b1aaf7</u> 000dfcc19983.

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- 2008 County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements, Mineral Resources. <u>https://www.sandiegocounty.gov/content/dam/sdc/dplu/docs/Mineral Resources Guidelines.</u> <u>pdf</u>.
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- 101 -

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- 2011b Tables N-1 and N-2 of the General Plan Noise Element.
- 2014 Sweetwater Community Plan, San Diego County General Plan. https://www.sandiegocounty.gov/content/dam/sdc/pds/docs/CP/Sweetwater_CP.pdf.
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- 2020 Ordinance Sections 68.511 through 68.520 of the San Diego County Code Of Regulatory Ordinances Relating to Diversion of Construction and Demolition Materials from Landfill Disposal. Amended and Effective March 13. <u>https://www.sandiegocounty.gov/content/dam/sdc/dpw/SOLID_WASTE_PLANNING_and_RE_CYCLING/Files/Updated%20ordinance%20for%20the%20web%20V2.pdf</u>.
- 2022 County Of San Diego Construction & Demolition (C&D) Debris Recycling Permit Instructions. <u>https://www.sandiegocounty.gov/content/dam/sdc/dpw/SOLID_WASTE_PLANNING_and_RE</u> <u>CYCLING/UpdatedCDResources/Permit_Instructions_July22.pdf</u>.
- San Diego Local Agency Formation Commission (LAFCO)
 - 2021 Commission Policies, San Diego LAFCO. https://www.sdlafco.org/home/showpublisheddocument/3042/637764577606600000.

- 102 -

LIST OF APPENDICES

- A Air Quality & Greenhouse Gas Analysis
- B Transportation Assessment
- C Biological Resources Letter Report
- D Cultural Resources Survey Report
- E Preliminary Geotechnical Investigation
- F Stormwater Quality Management Plan
- G Phase I & II Environmental Site Assessment
- H Stockpile Sampling Report
- I Preliminary Hydrology and Hydraulics Report
- J Noise Analysis
- K Service Availability Forms