

FINAL

CEQA Addendum

Weld Boulevard Distribution Center Project

January 2021

Prepared for:



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Acronyms and Abbreviations

2009 EIR	Forester Creek Industrial Park Project Environmental Impact Report
2009 project	Forester Creek Industrial Park Project
ADT	average daily trips
ALP	Airport Land Use Plan
ALUCP	Airport Land Use Compatibility Plan
BMP	best management practice
CBC	California Building Code
CEQA	California Environmental Quality Act
cfs	cubic feet per second
CNEL	community noise equivalent level
CO _{2e}	carbon dioxide equivalent
County	County of San Diego
dBA	A-weighted decibel
EIR	Environmental Impact Report
GHG	greenhouse gas
gsf	gross square feet
HVAC	heating, ventilation, and air conditioning
LOS	level of service
MT	metric ton
NO _x	nitrogen oxides
PFSD	prime free same day
PM	particulate matter
PM ₁₀	particulate matter measuring no more than 10 microns in diameter
PM _{2.5}	fine particulate matter measuring no more than 2.5 microns in diameter
project	Weld Boulevard Distribution Center Project
RAQS	Regional Air Quality Strategy
RPZ	Runway Protection Zone
RTS	return to station
SIP	State Implementation Plan
USFWS	U.S. Fish and Wildlife Service

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Section 1 Introduction

1.1 Project Location

Chesnut Properties (project applicant) is proposing the development of the proposed Weld Boulevard Distribution Center Project (project) on approximately 31.7 acres in the City of El Cajon, California (Figure 1, Regional Location). The project site is part of the Gillespie Field airport located directly east of the site and is owned by the County of San Diego (County). The City of El Cajon/City of Santee jurisdictional boundary coincides with the northern and northwestern project site property lines. The project site is bounded by residential land uses in the City of Santee to the west and industrial land uses and one residence in the City of Santee to the north. The remainder of the site is bounded by land uses in the City of El Cajon, including the County Operations Facility to the southwest, Weld Boulevard to the south, Cuyamaca Street to the east, Prospect Avenue to the north, and a concrete-lined section of the Forester Creek channel to the northeast. The project site is relatively flat and was previously graded. Prior uses included a golf driving range and cement processing facility. Currently, the project site consists of disturbed open space (Figure 2, Project Site). The project site is located less than a half-mile from the San Diego Metropolitan Transit System San Diego Trolley Stop, Gillespie Field Station. The Gillespie Field Station is a Green Line station of the San Diego Trolley.

1.2 Project Background of Previously Certified EIR

On August 11, 2009, the City of El Cajon Council certified the Forester Creek Industrial Park Project (previously referred to as the “Forrester” Creek Industrial Park) (2009 project) Environmental Impact Report (2009 EIR) (State Clearinghouse No. 2006011027), which included a General Plan Amendment and Specific Plan 291 Amendment related to the proposed development of an industrial park on the proposed project site. The proposed development consisted of approximately 463,000 square feet of multi-tenant industrial space, combining light-industrial use and warehouse uses. The General Plan Amendment changed the land use designation of the project site from Open Space (OS) and Special Development Area (SDA) 1 to Industrial Park (IP). The amendment to Specific Plan 291 changed the land use designation of the project site from commercial use to warehousing and distribution.

The 2009 EIR evaluated an industrial park project with approximately 463,000 square feet of multi-tenant industrial space, combining light-industrial and warehouse uses. The project was proposed to be constructed in three phases.

Phase I included approximately 196,500 square feet of industrial building space on the southeastern portion of the site and would include approximately 418 parking spaces. Phase II would consist of a 191,473-square-foot industrial building located in the northwestern portion of the site. An additional approximately 237 parking spaces would be provided to the north, west and

south of the building. Finally, Phase III would include a 75,000-square-foot rectangular structure located in the western portion of the site and included 138 parking spaces located to the north, west and south of the building.

The 2009 project also proposed site access and circulation improvements, including the construction of the northern leg of the Gillespie Way/Weld Boulevard intersection. The 2009 project proposed to implement low water use landscaping, utilities improvements and extensions, and water quality best management practices (BMPs). In addition, a six-foot high perimeter wall was proposed to be constructed along the northern and western project property lines to provide a distinct boundary between the proposed industrial park and adjacent residential uses. Retaining walls were proposed within the site and along the northeastern perimeter of the project site.

1.3 Project Description

The current project proposes development of an approximately 142,756-square-foot distribution warehouse, parking, and designated product pick-up and drop-off areas within 27 acres of the project site (Figure 3, Proposed Site Plan). Table 1 shows the comparison of the 2009 project features with the proposed project features.

Table 1. Comparison of 2009 Project to Proposed Project

2009 Project	Proposed Project
Industrial Park (463,000 gsf)	Distribution Warehouse (125,756 gsf)
Parking Spaces = 490	Parking Spaces = 967
—	Office Space (17,000 gsf)
3 Separate Buildings	1 Building
Building Height 35 Feet	Building Height 30 Feet
3,704 Average Daily Trips	1,476 Standard ADT and 3,548 Peak ADT
Project Construction 3 Years (156 Weeks)	Project Construction 1 Year (50 Weeks)
Balanced Cut and Fill On Site	20,000 Cubic Yards of Fill

Notes: 2009 project = Forester Creek Industrial Park Project; gsf = gross square feet; ADT=average daily trips
Standard ADT= trips generated during standard operations; Peak ADT= trips generated during peak holiday season

Proposed Warehouse Building. The project would construct a 142,000-square-foot distribution warehouse consisting of 124,535 square feet of warehouse space and approximately 17,000 square feet of office space. The building would be a rectangular structure 30 feet tall. All outdoor lighting would be directed toward the distribution warehouse industrial buildings or parking areas and would not shine directly at residences.

The delivery station would operate 24 hours per day, 7 days a week, to support the delivery of packages to customer locations between 11:00 a.m. and 9:00 p.m. Delivery operations would consist of approximately 230 delivery vans loading and departing from the delivery station at a rate of 75 vans every 20 minutes in the morning (between 9:50 a.m. and 11:10 a.m.) and returning

to the delivery station in the evening (between 7:10 p.m. and 9:10 p.m.). Approximately 21 line-haul trucks would deliver packages to the delivery station each night primarily between the hours of 10:00 p.m. and 8:00 a.m. However, during the holiday season, peak operation may reach up to 600 vans and 48 trucks in a 24-hour period. Table 2 shows the proposed daily shifts and number of employees working those shifts.

Table 2. Operational Shifts and Estimated Employees

Shifts	Start/End Time		Number of Employees
First Shift	2:00 a.m.	12:30 p.m.	102 associates
Second Shift	6:00 a.m.	2:30 p.m.	32 associates
Third Shift	1:30 p.m.	10:00 p.m.	32 associates
PFSD Shift	2:00 p.m.	6:00 p.m.	26 associates
RTS Shift	12:00 p.m.	10:30 p.m.	5 associates
Drivers	9:20 a.m.	9:10 p.m.	230 drivers

Notes: PFSD = prime free same day; RTS = return to station

Parking. The project site would be developed with approximately 967 total parking spaces, including designated spaces for associates, support staff, managers, personal vans, and warehouse delivery vans in the northern, eastern, southern, and western outskirts of the project site. The project would also include a van loading area consisting of approximately 72 spaces directly west of the warehouse and a van staging area for approximately 72 vans immediately next to the van loading area. There would be also be 6 grade level doors on the western side of the warehouse. In addition, there would be 15 dock-high doors (above grade), and a trailer and box truck loading area for approximately 13 vehicles north of the proposed warehouse.

Vehicle Access. Access to the site would be via three driveways on Weld Boulevard. All trucks and vans would enter and all trucks would exit the site via the eastern driveway. This driveway would only be accessible from the eastern approach of Weld Boulevard and would provide a right turn only onto Weld Boulevard. No left turns would be permitted from the eastern driveway onto Weld Boulevard.

The middle driveway would be located between Gillespie Way (western driveway) and the eastern driveway. This driveway would be for associates only. The driveway would provide one outbound lane and one inbound lane. The driveway would only be accessed from a right turn from Weld Boulevard. Egress from the site would allow for both right and left turns onto Weld Boulevard.

The western driveway would be located at the intersection of Weld Boulevard and Gillespie Way. This driveway would provide egress only for all vans. The intersection would be reconfigured to provide three outbound lanes from the site, a dedicated right turn, through lane with left turn, and left turn lane. The project would install a traffic signal at the intersection.

Off-Site Improvements. The project would also include the dedication of right-of-way and construction of curb and gutter improvements on Weld Boulevard along the project site frontage to City of El Cajon Standards. Pedestrian access would be provided via new sidewalks along the project site frontage on Weld Boulevard.

Utilities. Utilities construction would include the extension of gas and electric transmission facilities, sewer and water pipelines, and communications facilities to serve the proposed project site. All utilities improvements would be made underground. Existing utilities are located in easements within or adjacent to the surrounding street system, including Weld Boulevard, Gillespie Way and Cuyamaca Street. The proposed project would include connections to existing nearby utilities infrastructure.

Perimeter Wall. A six-foot high solid block wall would be constructed adjacent to existing residential properties located along the western and northern boundaries of the project site to provide a distinct boundary between the proposed industrial park project and existing residential areas.

Landscaping. Site landscaping used on site would be consistent with the City of El Cajon's Municipal Code, Chapter 17.195, and the City's Landscape Design Manual. All proposed plant material would be drought and heat tolerant and would be grouped by hydrozone based on the amount of water needed to sustain them. A permanent underground irrigation system with an automatic controller would be provided.

Stormwater. A 2.2-acre rectangular shaped stormwater detention basin would be constructed on the eastern side of the project site. An underground storm drain system would be constructed throughout the project site to capture and convey the flow toward the stormwater basins. Two discharge outlets would be provided to the stormwater basin.

Construction

Construction is anticipated to begin in April 2021 and take approximately 50 weeks to complete. Site preparation to include grading would be accomplished first. The project would include cuts and fills of approximately 24 feet and 12 feet, respectively. Cut and fill slopes would be inclined at 2:1 (maximum:horizontal) with maximum heights of approximately 30 feet and 55 feet, respectively. The project requires 20,000 cubic yards of fill that would be imported to the site. During construction, water from the southern channel would be diverted. Off-site runoff would be collected at the point they enter the project on the southern and westerly boundary and undergrounded to the creek along the northeastern property line. The discharge of these flows would occur in one of three existing culverts that connect to the creek. The eastern runoff and channel would continue to flow as it does currently. Any stormwater runoff produced on site would be collected and conveyed to an on-site biofiltration basin where it would then outfall to the same creek at the northeastern boundary.

Equipment expected to be used on site include earthmoving equipment, excavators, concrete trucks, forklifts, a crane, and general trucking. Construction would occur in two phases. The first phase would include the distribution warehouse, the eastern and western driveways, designated truck and van pick-up and drop-off locations, and van parking. The second phase would include the construction of the associate parking lot on the southside of the distribution center.

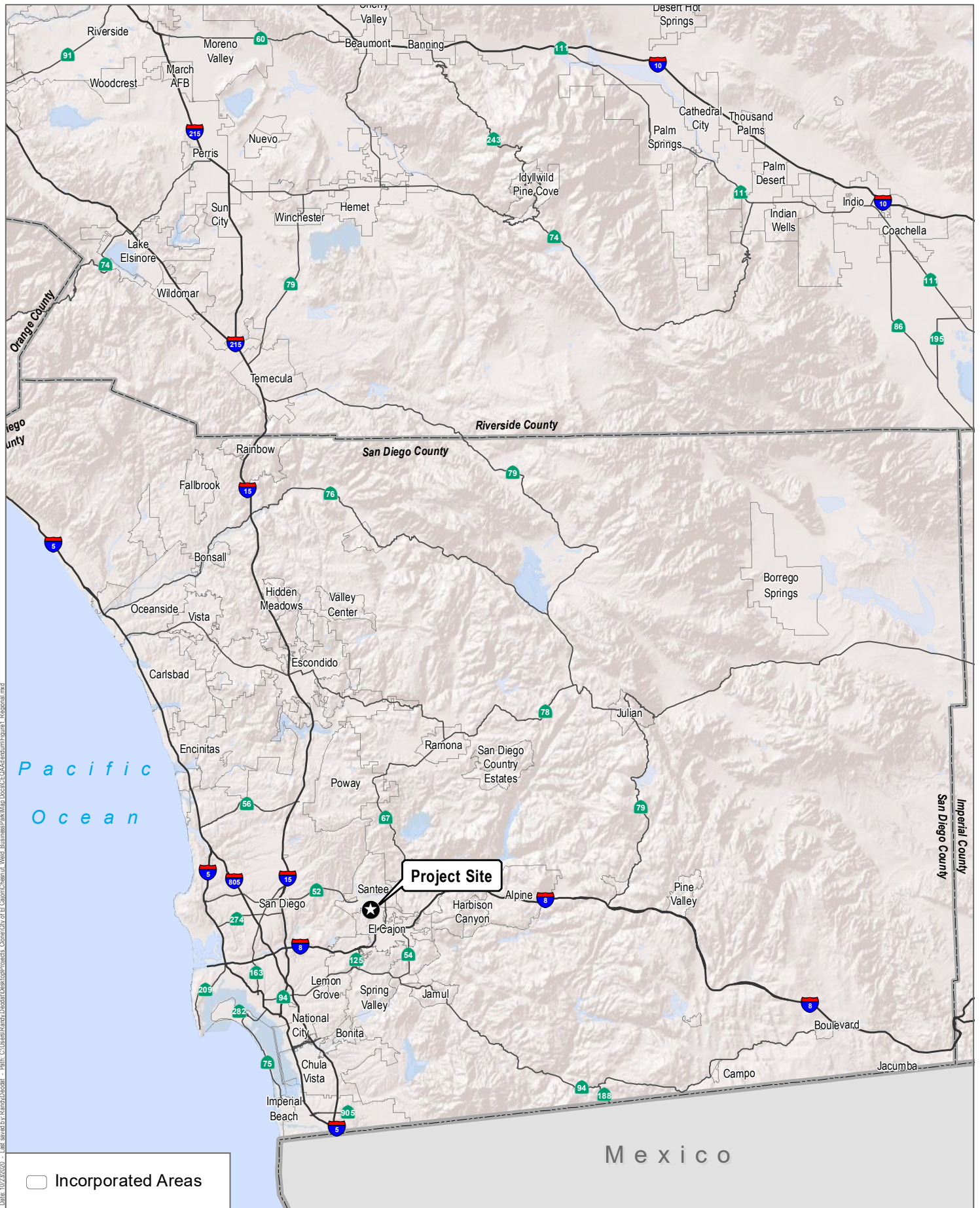
1.4 Purpose of this Addendum and Basis for Decision to Prepare Addendum

Pursuant to California Environmental Quality Act (CEQA) Guidelines, Sections 15162 and 15164(e), the purpose of the analysis is to demonstrate whether there are project changes and the presence of changed circumstances or new information relative to the project, since the 2009 EIR was certified, that would require major revisions of the previous EIR due to new significant environmental effects or a substantial increase in the severity of previously identified significant effects. CEQA Guidelines, Section 15164(a), states that an Addendum to a previously certified EIR may be prepared if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a Subsequent or Supplemental EIR have occurred. Pursuant to CEQA Guidelines, Section 15164(d), this Addendum is intended to inform the City's consideration and action on the project. City approval of this Addendum requires concurrence by the Community Development Director that all procedures required by the City were followed. Pursuant to CEQA Guidelines, Section 15164(c), this Addendum need not be circulated for public review.

The Addendum will be limited to those environmental topics addressed in the original 2009 EIR. This precedent has been set in two appellate court decisions upholding the preparation of an Addendum for a previously certified EIR *Concerned Dublin Citizens V. City of Dublin*, 214 Cal.App.4th 1301 (2013) and *Citizens for Responsible Equitable Environmental Development V. City of San Diego*, 196 Cal.App.4th 515 (2011). In both cases the lead agency prepared an Addendum to a previously certified EIR. The facts and circumstances in these cases are similar to the Weld Boulevard Distribution Center project. These appellate court decisions indicate that the issues discussed in an Addendum are limited to those addressed in the original EIR. They also indicate that "changed circumstances" means physical changes, not legal changes. Based on this approach, only the topics originally addressed in the certified EIR are required to be addressed in the Addendum. Thus, any CEQA topics that have been added or modified since 2009 are not required to be addressed.

The following environmental resources, if checked below, would be potentially affected by this project and would involve at least one significant impact that substantially exceeds or is otherwise outside the scope of activities evaluated for potential environmental effects in the 2009 EIR. If "None" is checked below, this project is deemed entirely consistent with and covered by the environmental analysis contained in the 2009 EIR. The project could potentially result in one or more of the following environmental effects.

- | | | |
|---|--|--|
| <input type="checkbox"/> Aesthetics | <input type="checkbox"/> Air Quality | <input type="checkbox"/> Biological Resources |
| <input type="checkbox"/> Cultural Resources | <input type="checkbox"/> Geology/Soils | <input type="checkbox"/> Global Climate Change
and Energy |
| <input type="checkbox"/> Hazards/Hazardous
Materials | <input type="checkbox"/> Hydrology/Water Quality | <input type="checkbox"/> Land Use |
| <input type="checkbox"/> Noise | <input type="checkbox"/> Public Services | <input type="checkbox"/> Traffic |
| <input type="checkbox"/> Utilities | <input checked="" type="checkbox"/> None | |



Harris & Associates



0 5 10
Miles

Figure 1

Regional Location

Weld Boulevard Distribution Center Project

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 Project Site

Source: SanGIS Imagery 2017.

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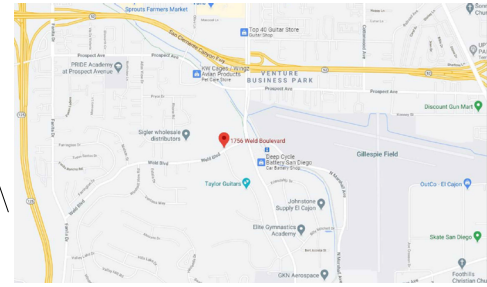
Path: C:\Users\Randy\Desktop\Projects - Clone\City of El Cajon\Chesnut Weld BusinessPark\Map Docs\CEOA Addendum



PROTOTYPE PARKING BREAKDOWN			
PARKING	REQUIRED	PROPOSED	GAP
ASSOCIATE SPACES	172	168	-4
ANZL MANAGEMENT SPACES (Support)	15	15	0
DSP MANAGEMENT SPACES	28	33	+5
VAN PERSONAL VEHICLE SPACES	72	110	+38
CUSTOMER SPACES	6	6	0
GUEST SPACES	3	3	0
TOTAL ASSOCIATE PARKING	296	335	+39
VAN PERSONAL	144	144	0
VAN PARKING	413	461	+48
VAN BUFFER	25	27	+2
TOTAL VAN	582	632	+50
TOTAL PARKING	878	967	+89
ULTRAVAN LOADING	72	72	0
VAN STAGING	72	72	0
LOADING DOCK SPACES	10	15	+5
TRAILER PARKING SPACES	3	13	+10

This conceptual design is based upon a preliminary review of entitlement requirements and on unverified and possibly incomplete site and/or building information, and is intended merely to assist in exploring how the project might be developed.

Boundary Source:
CIVIL CAD FILE



Source: Ware Malcomb 2020.

Figure 3
Proposed Site Plan

Weld Boulevard Distribution Center Project

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Section 2 Determination

On the basis of this initial evaluation:

- ☒ I find that the proposed project WOULD NOT have any significant effects on the environment that either have not already been analyzed in the prior 2009 EIR or that are more significant than previously analyzed. Pursuant to CEQA Guidelines Section 15168(c), CEQA does not apply to such effects. A Notice of Determination (Section 15094) will be filed.
- ☐ I find that the proposed project will have effects that either have not been analyzed in the prior 2009 EIR or are more significant than described in the prior 2009 EIR. With respect to those effects that are subject to CEQA, I find that such effects WOULD NOT be significant and a NEGATIVE DECLARATION will be prepared.
- ☐ I find that the proposed project will have effects that either have not been analyzed in the prior 2009 EIR or are more significant than described in the prior 2009 EIR. I find that although those effects could be significant, 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.
- ☐ I find that the proposed project would have effects that either have not been analyzed in a prior 2009 EIR or are more significant than described in the prior 2009 EIR. I find that those effects WOULD be significant, and an ENVIRONMENTAL IMPACT REPORT is required to analyze those effects that are subject to CEQA.



Signature

21 Jan 21

Date

Anthony Shute

Printed Name

Director of Community Development

Title

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Section 3 Environmental Checklist

3.1 Aesthetics

Section 4.1 of the 2009 EIR evaluates potential impacts as a result of implementing the 2009 project and concluded that implementation would result in less than significant impacts to scenic vistas, visual character and lighting and glare (Sections 4.1.4, 4.1.6, and 4.1.7). No potential for significant impacts to scenic corridors were identified (Section 4.1.5). No mitigation measures were required for aesthetic impacts as described in the 2009 EIR.

Would the project:	Impact Analyzed in the 2009 EIR	Impact Not Examined in 2009 EIR		
		No Impact	Less Than Significant Impact	Potentially Significant Impact
a. Have a substantial adverse effect on a scenic vista?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Substantially degrade the existing visual character or quality of the site and its surroundings?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- a. The 2009 EIR addressed key vantage points 1, 5 and 6 as pertaining to this issue question. Similar to the 2009 project, the views of the undeveloped ridgelines east as shown in key vantage points 1, 5, and 6 would be altered by development of the proposed project. However, no significant impacts to key vantage points 1, 5, or 6 were identified in the 2009 EIR. The project proposes to construct a rectangular structure 30 feet tall, as opposed to 35 feet tall for the 2009 project. In addition, the proposed project is significantly smaller than the 2009 project and only proposes to construct one 142,756-square-foot rectangular distribution warehouse building as compared to three industrial buildings totaling 463,000 feet as analyzed in the 2009 EIR. Similar to 2009 project, the proposed project would not partially block the views of these scenic vistas due to building construction. Therefore, the project would result in a less than significant impact and would not result in any new significant environmental effects or a substantial increase in the severity of previously identified significant effects regarding scenic vistas.
- b. As described in the 2009 EIR, the nearest scenic highway is State Route (SR) 125 between Interstate 8 (I-8) and SR-94, approximately 3.5 miles from the project site. Similar to the 2009 project, the proposed project site is not visible from this highway. Therefore, the project would result in less than significant impacts and would not result in any new significant

environmental effects or a substantial increase in the severity of previously identified significant effects regarding scenic resources.

- c. Similar to the 2009 project, the proposed project would change the visual character of the site by developing the mostly undeveloped project site with industrial distribution warehouse, driveways, parking areas, and landscaping. The areas surrounding the project site are currently developed with industrial land uses, Gillespie Field airport, and single-family residences. Gillespie Field airport and industrial uses are not considered sensitive viewers because activities conducted in these areas are not significantly affected by the quality of the scenic environment.

The proposed project would be visible from adjacent residences to the west and northwest. The easterly views from these homes currently consist of the undeveloped project site, Gillespie Field airport, industrial development, and undeveloped ridgelines in the distant background. Development of the proposed distribution warehouse would be consistent with the visual character of the existing nearby industrial development and Gillespie Field airport. The currently undeveloped project site is not considered to be a scenic resource; therefore, the development of the site would not substantially degrade the existing visual character of the area. To the extent possible, the project site would be landscaped with native vegetation, consistent with the existing physical setting of the site. In addition, a 6-foot solid block wall would be constructed along the north and western project boundary consistent with the City of El Cajon design standards. Therefore, the project would result in less than significant impacts and would not result in any new significant environmental effects or a substantial increase in the severity of previously identified significant effects regarding visual character.

- d) Similar to the 2009 project, the proposed project would require nighttime lighting for security and would result in an increase in night lighting compared to the existing condition but would be likely less than what was analyzed in the 2009 EIR. The proposed project building would be farther from existing residences than the 2009 project buildings. The closest residences to the proposed building under the 2009 project were located approximately 150 feet west and north of the building. The nearest residence to the proposed project would be located approximately 300 feet north of the proposed building. The proposed project lighting would be designed in compliance with the City's Zoning Ordinance, which requires the development of an on-site lighting plan for all parking areas, pedestrian walkways and common open space/recreation areas to ensure that they provide adequate lighting for pedestrian and vehicular safety, but do not create a nuisance on any other property. As a project design feature, outdoor lighting would be directed toward the distribution warehouse building or parking areas and would not shine directly at residences. In addition, the proposed project includes the construction of a six-foot high solid block wall along the north and western site boundary which would help prevent outdoor lighting from the project parking area from spilling onto adjacent residential properties.

As discussed Section 1.3, Project Description, the distribution warehouse would operate 24 hours a day. Approximately 21 line-haul trucks would deliver packages to the delivery station each night primarily between the hours of 10:00 p.m. and 8:00 a.m. Trucks would enter and exit the site via the eastern driveway, farthest from adjacent residents. The trailer parking and loading areas would be directed away from the residential properties located to the west of the project site and would not shine directly at the residences. In addition, the presence of the six-foot block wall and the higher elevation of most of the residential homes relative to the proposed project would prevent the lights from the trucks spilling over into the residential areas.

In addition, the proposed project would not include large expanses of glass or other highly reflective material that would result in substantial daytime glare. Consistent with the 2009 EIR, the proposed project would not create a new source of substantial light or glare that would adversely affect views in the area and impacts would be less than significant. Therefore, the project would result in less than significant impacts and would not result in any new significant environmental effects or a substantial increase in the severity of previously identified significant effects regarding substantial light or glare.

3.2 Air Quality

Section 4.2 of the 2009 EIR evaluated the air quality effects from the implementation of the 2009 project and concluded that implementation would result in a significant cumulative impact during construction due to the exceedance of the significance threshold for oxides of nitrogen (NOx) emissions during simultaneous construction of Phase 3 and operation of Phases 1 and 2 (Section 4.2.5). Less than significant impacts were identified related to consistency with the Regional Air Quality Strategy (RAQS) and State Implementation Plan (SIP), sensitive receptors and odors (Sections 4.2.4, 4.2.6 and 4.2.7).

Mitigation Measure AIR-1, AIR-2, and AIR-3 were required during simultaneous project construction of Phase 3 and operation of Phases 1 and 2. Implementation of Mitigation Measure AIR-2 was determined to be infeasible because it would double the duration of construction for Phase 3 from 11 months to 22 months and would result in an economic impact to the project applicant. Implementation of Mitigation Measures AIR-1 and AIR-3 would reduce cumulative impacts. However, the 2009 EIR acknowledged the likely effective amount of reduction from implementation of Mitigation Measure AIR-3 could not be quantified at that time and impacts would remain potentially significant and unavoidable.

Would the project:	Impact Analyzed in the 2009 EIR	Impact Not Examined in 2009 EIR		
		No Impact	Less Than Significant Impact	Potentially Significant Impact
a. Conflict with or obstruct the implementation of the San Diego Regional Air Quality Strategy (RAQS) or applicable portions of the State Implementation Plan (SIP)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Result in emissions that would violate any air quality standard or contribute substantially to an existing or projected air quality violation?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Result in a cumulatively considerable net increase of PM10 or exceed quantitative thresholds for O ₃ precursors, oxides of nitrogen (NO _x) and volatile organic compounds (VOCs)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Expose sensitive receptors (including, but not limited to, schools, hospitals, resident care facilities, or day-care centers) to substantial pollutant concentrations?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. Create objectionable odors affecting a substantial number of people?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- a) The 2009 project included a General Plan Amendment that changed the land use designation of the project site from Open Space (OS), Special Development Area (SDA-1) and Public Institution (PI) to Industrial Park (IP). Under the current site designation of Industrial Park (IP), the proposed project is allowable and consistent with the El Cajon General Plan and is therefore consistent with the RAQS. In addition, all industrial uses are required to comply with the Air Pollution Control District Rules and Regulations, which are generated by the SIP strategies. Therefore, industrial uses including the proposed project are presumed to be in conformance with the SIP. Consistent with the 2009 EIR, the proposed project is not anticipated to conflict with or obstruct the implementation of the RAQS or applicable portions of the SIP.
- b, c) Construction and operational criteria pollutant emissions associated with the proposed project are summarized separately below.

Construction

Similar to the 2009 project, construction of the project would include grading, paving, building construction, and architectural coating activities. An Air Quality Technical Memorandum was prepared for the proposed project by Harris & Associates (January 2021) (Appendix A). Criteria pollutant emissions from construction of the proposed project were estimated using CalEEMod, Version 2016.3.2, based on project assumptions provided by the project applicant (Appendix A). The start of construction is assumed to begin in April 2021 and last

approximately 50 weeks, including grading and site preparation, paving, and building construction and coating. The total disturbance area would be approximately 27 acres, and the estimated material import quantity would be 20,000 cubic yards. The analysis assumed construction would occur in one phase as opposed to two phases, which provides a conservative analysis.

As shown in Table 3, all criteria emissions associated with construction of the proposed project would be below screening level thresholds. Therefore, consistent with the 2009 EIR, the proposed project would not result in emissions that would violate any air quality standards and impacts associated construction activities would be less than significant.

Table 3. Proposed Project Construction Maximum Daily Air Pollutant Emissions (pounds/day)

Emissions Source	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Proposed Project						
Grading	4.63	54.55	34.43	0.09	9.47	5.49
Paving	2.37	17.00	18.95	0.04	1.32	1.65
Building Construction	112.13	39.22	26.49	0.08	2.70	1.57
Maximum Daily Emissions	112.1	54.55	34.43	0.09	9.47	5.49
Screening Level Threshold	137	250	550	250	100	55
<i>Above Threshold?</i>	<i>No</i>	<i>No</i>	<i>No</i>	<i>No</i>	<i>No</i>	<i>No</i>

Source: Appendix A.

Notes: CO = carbon monoxide; NO_x = nitrogen oxide; PM₁₀ = respirable particulate matter; PM_{2.5} = respirable particulate matter; SO_x = sulfur oxide; VOC = volatile organic compound

Operation

The operational emissions associated with the proposed project are listed in Table 4. Similar to the 2009 project, vehicle emissions would be the greatest source of operational emissions from the proposed project. The proposed project would result in fewer operational trips than the 2009 project. The proposed project would result in 1,994 average daily trips compared to the 3,704 average daily trips calculated for the 2009 project. The 1,994 average daily trips (ADT) is a yearly average, based on two scenarios (standard and peak). For approximately 9 months out of the year, average daily trips are estimated at 1,476 trips per day, but during the 2-month holiday season (November-December), and one week in October trips increase to 3,548 per day. In addition, the location of the Metropolitan Transit System trolley stop less than 0.5 miles from the project site and adjacent regional bicycle path provide employees with alternative transportation options. As shown in Table 4, the proposed project's operation emissions would be below screening level thresholds.

Table 4. Proposed Project Operational Pollutant Emissions

Emissions Source	VOC/ROG	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Maximum Daily Emissions (pounds/day)						
2009 Project	56.75	239.69	499.59	0.91	99.26	20.06
Proposed Project	11.52	34.70	97.68	0.36	32.34	8.84
Screening Level Threshold	137	250	550	250	100	55
<i>Above Screening Level Threshold?</i>	<i>No</i>	<i>No</i>	<i>No</i>	<i>No</i>	<i>No</i>	<i>No</i>
Annual Emissions (tons/day)						
2009 Project	7.24	30.01	62.42	0.11	12.41	2.51
Proposed Project	1.49	3.68	9.56	0.04	3.23	0.89
Screening Level Threshold	15	40	100	40	15	10
<i>Above Screening Level Threshold?</i>	<i>No</i>	<i>No</i>	<i>No</i>	<i>No</i>	<i>No</i>	<i>No</i>

Source: Appendix A.

Notes: CO = carbon monoxide; NO_x = nitrogen oxide; PM₁₀ = respirable particulate matter; PM_{2.5} = respirable particulate matter; ROG = reactive organic gas; SO_x = sulfur oxide; VOC = volatile organic compound

Consistent with the 2009 EIR, the proposed project would not result in emissions that would violate any air quality standards and impacts associated with operational air pollutant emissions would be less than significant. Therefore, the project would result in less than significant impacts and would not result in any new significant environmental effects or a substantial increase in the severity of previously identified significant effects regarding violation of air quality standards.

- d) Based on the Transportation Impact Analysis prepared for the proposed project by Linscott, Law & Greenspan, Engineers (December 2020) (Appendix B), under a post-cumulative scenario, all intersections in the project vicinity would operate at acceptable level of service (LOS). Therefore, per the California Department of Transportation Intelligent Transportation Systems Transportation Project-Level Carbon Monoxide Protocol, it can be assumed that no exceedances of the CO standard would occur.

With respect to diesel exhaust particulate matter, the proposed project would also have short-term diesel exhaust particulate matter emissions associated with the operation of heavy equipment during construction. Similar to the 2009 project, construction would be short-term. The duration of construction would be reduced compared to the 2009 project. As stated under Issue 2, the proposed project would yield fewer operational trips than the 2009 project, including fewer truck trips. An average of 370 daily truck trips were anticipated for the 2009 project, compared to a maximum of 96 truck trips to the proposed project during peak season. Moreover, CARB recommends avoiding siting new sensitive land uses within 1,000 feet of a distribution center that accommodates more than 100 trucks per day (CARB 2005). The

maximum number of truck trips during peak season associated with the proposed project is below the 100 trucks per day threshold. Since the higher number of truck trips assumed in the 2009 EIR did not result in a significant impact, it can be assumed that potential health risks from truck traffic from the proposed project, which would have fewer truck trips, would similarly have a less than significant impact.

Construction and operational impacts associated with the proposed project are addressed separately below.

Construction

Similar to the 2009 project, odors associated with construction of the proposed project would be temporary. The proposed project would require similar construction practices. The duration of construction would be reduced from approximately 3 years (156 weeks) to 50 weeks under the proposed project; therefore, the potential odor exposure time of nearby residences would be reduced. Consistent with the 2009 EIR, the proposed project would result in a less than significant impact related to odors during construction.

Operation

Objectionable odors associated with the operation of the proposed project may similarly exist in trace amounts, but potential exposure would likely be less than that identified for the 2009 project because of the reduced project size and increased distance from nearby receptors. The closest residences to the proposed buildings under the 2009 project were located approximately 150 feet west and north of the buildings. The nearest residence to the proposed project's building would be located approximately 300 feet north of the building. The proposed project does not include any new sources of operational odor that were not addressed in the 2009 EIR. Consistent with the 2009 EIR, the project would result in a less than significant impact related to odors from operation.

Therefore, the proposed project would result in less than significant impacts and would not result in any new significant environmental effects or a substantial increase in the severity of previously identified significant effects regarding objectionable odors.

3.3 Biological Resources

Section 4.3 of the 2009 EIR evaluated the potential for biological resource impacts associated with implementation of the 2009 project and concluded that implementation would result in potentially significant impacts to sensitive species and habitats (Section 4.3.4). It was determined that no significant impacts from conflicts to adopted habitat conservation plans would occur (Section 4.3.5).

Impacts to disturbed Diegan coastal sage scrub and non-native grassland habitat would be mitigated to less than significant with implementation of Mitigation Measures BIO-1 and BIO-2,

respectively. Impacts to nesting migratory birds and raptors habitat would be mitigated to less than significant with implementation of Mitigation Measure BIO-3. Potentially significant impacts to nesting migratory birds and raptors from construction noise would be mitigated to less than significant with Mitigation Measure BIO-4. Mitigation Measure BIO-5 would mitigate impacts to jurisdictional waters to less than significant. Mitigation Measure BIO-6 would mitigate impacts to San Diego ambrosia (*Ambrosia pumila*) to less than significant.

Would the project result in:	Impact Analyzed in the 2009 EIR	Impact Not Examined in 2009 EIR		
		No Impact	Less Than Significant Impact	Potentially Significant Impact
a. A substantial adverse effect (either directly or through habitat modifications) on any species identified as a candidate, sensitive, or as possessing special status in regional or local plans, policies, or regulations?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. A substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by USFWS or CDFG?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. A substantial adverse effect on federal or State jurisdictional areas through direct removal, filling, hydrological interruption or other means?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Interfering substantially with the movement of any native resident, migratory fish or wildlife species, or with established native resident or migratory wildlife corridors?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. Impeding the use of native wildlife nursery sites or conflict with the provisions of an adopted Habitat Conservation Plan, NCCP, or other approved state, regional, or local habitat conservation plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

a) Sensitive Plant Species

As stated in the Biological Technical Report Update prepared for the proposed project by Harris & Associates (January 2021) (Appendix C), an updated biological resources survey was conducted on the project site in August 2020. Consistent with the 2009 EIR, San Diego ambrosia was identified and mapped in the central and eastern portions of the project site (Figure 4, Sensitive Plant Species Observations). The central patch, containing approximately 250 stems, and the larger southeastern patch, containing approximately 3,000 stems, would be directly impacted by implementation of the project (Figure 5, Biological Resources Impacts). Consistent with the 2009 EIR, the project would result in direct impacts to San Diego ambrosia, which would be considered a significant impact due to the rarity of the species (only 12 populations are known to remain) and the federally endangered status of the species (SDMMP 2020). Mitigation Measure BIO-7 requires the impacts to the 250-stem and 3,000-stem populations of San Diego ambrosia be mitigated prior to the issuance of a grading permit. Because there is no federal action

or federal jurisdiction on the project, Sections 7 or 10(a) of the federal Endangered Species Act do not apply. A new Mitigation Measure BIO-7 has been added to provide the specific measures necessary for translocation for San Diego ambrosia.

Consistent with the 2009 EIR, implementation of Mitigation Measure BIO-7 would reduce impacts sensitive plant species to less than significant.

Sensitive Animal Species and Nesting Birds

Consistent with the 2009 EIR, project implementation has the potential to impact bird species protected under the Migratory Bird Treaty Act and California Fish and Game Code, Section 3504. If construction is conducted during the migratory bird and raptor breeding season (January 15 through August 31), direct impacts from disturbance and displacement of nesting birds and raptors during vegetation removal could result in significant direct impacts to bird species protected under the Migratory Bird Treaty Act. County of San Diego Group 1-listed red-shouldered hawk (*Buteo lineatus*) and turkey vulture (*Cathartes aura*) were observed flying above the project site. The project would also result in direct impacts to migratory bird and raptor foraging habitat (e.g., non-native grassland) and migratory bird and raptor nesting habitat (e.g., eucalyptus woodland) (Figure 5). Migratory birds and raptors are protected under the Migratory Bird Treaty Act. Therefore, similar to the 2009 project, impacts to these habitats from construction of the proposed project would result in a significant impact to protected birds and raptors.

In addition, similar to the 2009 project, construction noise from sources such as clearing and grading would result in a temporary impact to local animal species. Noise-related impacts would be considered significant if sensitive species, such as nesting birds and raptors, were displaced from their nests and failed to breed. Birds and other species may be temporarily displaced from the vicinity of the construction area but would be expected to return following grading. Raptors nesting within any area impacted by construction noise exceeding 60 dBA Leq (time weighted average of the level of sound in decibels) may be significantly impacted. Therefore, similar to the 2009 project, indirect impacts to sensitive animal species from proposed project construction noise would result in a significant impact.

Mitigation Measure BIO-3 requires no clearing of eucalyptus woodland shall take place during raptor breeding season (January 15 through August 31). The measure has been updated to include migratory birds. If clearing is proposed to take place during the breeding season, a preconstruction survey shall be conducted by a qualified biologist to determine if migratory bird and raptor nests (or nest building or other breeding or nesting behavior) occur in the eucalyptus woodland. Mitigation Measure BIO-4 requires no grading or clearing within 500 feet of a raptor nest during the raptor breeding season shall occur. The measure has been updated to include migratory birds and to extend the breeding season from March 15 to an

earlier start time of January 15. If clearing or grading would occur during the migratory bird and raptor breeding season (January 15 through August 31), a preconstruction survey shall be conducted by a qualified biologist to determine if migratory birds and raptors occur within the areas impacted by noise.

Consistent with the 2009 EIR, implementation of Mitigation Measures BIO-3 and BIO-4 would reduce impacts to sensitive animal species to less than significant.

Therefore, the project would not result in any new significant environmental effects or a substantial increase in the severity of previously identified significant effects regarding sensitive plant and animal species.

- b) A Biological Technical Report Update was prepared for the proposed project by Harris & Associates in January 2021 (Appendix C). Consistent with the 2009 project, construction activities for the proposed project include grading and vegetation removal that could result in permanent and temporary impacts to sensitive Diegan coastal sage scrub and non-native grassland and non-sensitive eucalyptus woodland, disturbed habitat, and developed land (Figure 5). As show in Table 5, implementation of the project would directly impact approximately 1.25 acres of disturbed Diegan coastal sage scrub and 23.70 acres of non-native grassland.

Table 5. Impacts to Sensitive Vegetation Communities on the Project Site

Vegetation Community	Acreage	
	Existing	Impacts
Non-Vegetated Channel (64200) ¹	0.03	<0.01
Emergent Wetland (including disturbed) (52440) ¹	0.02	0.02
Non-Native Grassland (42200) ²	23.70	23.70
Diegan Coastal Sage Scrub (including disturbed) (32500) ²	1.25	1.25
Total	25	24.97

Consistent with the 2009 EIR, the proposed project's impacts to these sensitive vegetation communities would be significant. Eucalyptus woodland, disturbed habitat, and developed land are not considered sensitive vegetation communities; therefore, impacts to these vegetation communities would not be considered significant and do not require mitigation.

Implementation of Mitigation Measures BIO-1 and BIO-2 would reduce impacts to sensitive Diegan coastal sage scrub and non-native grassland to less than significant. Impacts to Diegan coastal sage scrub would be mitigated at a 1:1 ratio and impacts to non-native grassland would be mitigated at a 0.5:1 ratio. The City of El Cajon shall approve the location and habitat quality of the off-site mitigation sites. Mitigation Measure BIO-1 has been updated to reflect that 1.25 acres of Diegan coastal sage scrub would be impacted by the proposed project and need to be

mitigated at 1:1 ratio. Mitigation Measure BIO-2 has been updated to reflect that 23.70 acres of non-native grassland would be impacted by the proposed project and need to be mitigated at a 0.5:1 ratio.

Consistent with the 2009 EIR, implementation of Mitigation Measures BIO-1 and BIO-2 would reduce impacts to sensitive vegetation communities to less than significant. Therefore, the project would not result in any new significant environmental effects or a substantial increase in the severity of previously identified significant effects regarding sensitive natural communities.

- c) Consistent with the 2009 EIR, construction activities for the proposed project would directly impact the jurisdictional aquatic resource areas on the project site. An aquatic resources delineation update survey was completed for the proposed project in 2020 (Appendix C). Two non-vegetated channels and one disturbed emergent wetland were identified in the southern, western, and eastern portions of the project site (Figure 6, Aquatic Resources). Implementation of the proposed project would directly impact approximately 0.02 acre of disturbed emergent wetland and less than 0.01 acre of non-vegetated channel in the southern and western portions of the project site (Figure 5). Consistent with the 2009 EIR, impacts to these aquatic resources from the proposed project would be significant. The project would avoid impacts to the approximately 0.02-acre eastern non-vegetated channel, and no impacts would occur (Figure 5). Mitigation Measure BIO-5 requires a Water Quality Certification pursuant to Section 401 of the Clean Water Act prior to construction. Mitigation Measure BIO-4 has been updated to remove the requirement for a Clean Water Act Section 404 permit from the U.S. Army Corps of Engineers because under new guidance issued by the Navigable Waters Protection Rule that went into effect in June 2020, it no longer applies to this project. Mitigation Measure BIO-4 has also been updated to specify the compensatory mitigation that would be required by the Regional Water Quality Control Board. A new BIO-6 has been added to require a Streambed Alteration Agreement under Section 1602 of the California Fish and Game Code. Consistent with the 2009 EIR, implementation of Mitigation Measure BIO-5 and BIO-6 would reduce the proposed project's impacts to jurisdictional aquatic resources to less than significant.

Therefore, the project would not result in any new significant environmental effects or a substantial increase in the severity of previously identified significant effects regarding jurisdictional aquatic resources.

- d) The project site is surrounded on all sides by residential, commercial, and transportation development and is unlikely to function as a wildlife corridor or habitat linkage. Although the upland and eucalyptus woodland habitat on the project site provide live-in habitat for several common animal species, the project site does not support regional wildlife corridors or habitat linkages. Consistent with the 2009 EIR, implementation of the proposed project would not result in significant impacts to wildlife corridors or habitat linkages. Therefore, the proposed

project would not result in any new significant environmental effects or a substantial increase in the severity of previously identified significant effects regarding the movement of native animals or wildlife corridors.

- e) The project site is not considered a native wildlife nursery site. Therefore, the project would not result in a significant impact to native wildlife nursery sites. The project is not in the County MSCP. The City of El Cajon does not have an approved MSCP Subarea Plan under the County MSCP and is, therefore, not required to comply with the conservation policies included in the program. However, the County MSCP was taken into account during the preparation of the biological resources analysis for the project due to its applicability to the surrounding region. Where appropriate, the project analysis of biological impacts reflects many of the standards established by the County MSCP, including species and vegetation community sensitivities and mitigation where applicable. The project would comply with local policies or ordinances protecting biological resources identified in the El Cajon General Plan. Consistent with the 2009 EIR, no impacts would occur to local conservation plans or local policies or ordinances from implementation of the project. Therefore, the project would not result in any new significant environmental effects or a substantial increase in the severity of previously identified significant effects regarding the native wildlife nurseries, or conflict with local policies and ordinances or regional conservation plans.

3.4 Cultural Resources

Section 4.4 of the 2009 EIR evaluates the potential for cultural resource impacts associated with implementation of the 2009 project and concludes that implementation would result in potentially significant impacts to human remains and less than significant impacts to archaeological resources (Section 4.4.4). No potential for significant impacts to paleontological resources or historical resources were identified (Sections 4.4.5 and 4.4.6).

The identification of human remains during construction activities would be addressed through implementation of Mitigation Measure CUL-1 along with their treatment in accordance with the California Public Resources Code and California Health and Safety Code and would reduce impacts to human remains to less than significant.

Would the project:	Impact Analyzed in the 2009 EIR	Impact Not Examined in 2009 EIR		
		No Impact	Less Than Significant Impact	Potentially Significant Impact
a. Cause a substantial adverse change in the significance of an archaeological resource?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Disturb any human remains, including those interred outside of formal cemeteries?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Directly or indirectly destroy a unique paleontological resource?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

d. Cause a substantial adverse change in the significance of a historical resource?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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- a) An updated Archaeological Resource Management Report was prepared for the proposed project by ASM Affiliates (January 2021) (Appendix D1). Consistent with the 2009 EIR, a 2020 South Coastal Information Center records search identified three previously recorded sites on the project property, recorded as SDI-5049, SDI-5051, and SDI-5052. The project site is a highly modified landscape that has been disturbed due to grading over time. In 2009, none of the three previously recorded sites was relocated during the pedestrian survey. These sites were assumed to be destroyed during processing of the 2009 project and relevant findings were made in the 2009 EIR. However, during the 2020 pedestrian survey, two of the previously identified sites were relocated. Subsequent cultural resources testing and evaluation of SDI-5051 and SDI-5052 was completed and determined that both sites lack subsurface integrity of deposits and produced a paucity of artifacts (refer to the Cultural Resources Testing Report prepared for the proposed project by ASM Affiliates [January 2021] [Appendix D2]). Therefore, the sites do not have the potential to provide information on prehistoric chronology or subsistence patterns and do not have the potential to be eligible for state and/or local registers. Thus, ground-disturbing activities would not adversely impact these resources. In the event that unknown archaeology resources may be discovered, Mitigation Measure CUL-1 from the 2009 EIR has been revised to include the preparation of an Unanticipated Discovery Plan prior to ground-disturbing activities to identify standard operation procedures. In addition, an archaeological monitor and a Native American monitor would be present during construction activities that would involve the excavation of over 3 feet into native soil. If an unknown cultural resource is encountered during site development, all construction activities in the vicinity would be suspended. The implementation of the revised Mitigation Measure CUL-1 would ensure that a significant impact would not occur. Consistent with the 2009 EIR, project implementation would not impact significant archaeological resources either listed on or eligible for the California Register. Therefore, the project would not result in any new significant environmental effects or a substantial increase in the severity of previously identified significant effects regarding archaeological resources.
- b) Consistent with the 2009 project, the potential exists for previously undiscovered human remains to be discovered during grading and site development activities of the proposed project. Mitigation Measure CUL-1 requires that if human remains are discovered, work shall halt in that area, and the procedures detailed in the California Health and Safety Code (Section 7050.5) and the California Public Resources Code (Section 5097.98), if applicable, shall be followed. Implementation of Mitigation Measure CUL-1 would reduce the potentially significant impacts to human remains to a less than significant level. Therefore, the project would not result in any new significant environmental effects or a substantial increase in the severity of previously identified significant effects regarding human resources.

- c) The project site is underlain by Cretaceous-age granitic materials associated with the Southern California Batholith. The Southern California Batholith is composed of late Jurassic to late Cretaceous (90 to 140 million years old) plutonic rocks, ranging in composition from granite to gabbro. No fossils are known to occur in these rock formations and they are generally assigned a zero paleontological resource sensitivity. Therefore, consistent the 2009 EIR, construction of the proposed project would not directly or indirectly destroy paleontological resources and no impact would occur. Therefore, the project would not result in any new significant environmental effects or a substantial increase in the severity of previously identified significant effects regarding paleontological resources.
- d) No historical resources were identified on the project site. Consistent with the 2009 EIR, implementation of the proposed project would not cause a substantial adverse change in the significance of a historical resource. Therefore, the project would not result in any new significant environmental effects or a substantial increase in the severity of previously identified significant effects regarding historical resources.

3.5 Geology and Soils

Section 4.5 of the 2009 EIR evaluates the potential for geology and soil impacts associated with implementation of the 2009 project and concludes that implementation would result in potentially significant impacts associated with unstable soils (Section 4.5.5). Implementation of the 2009 project would result in less than significant impacts to geological hazards and soil erosion or loss of topsoil (Sections 4.5.4 and 4.5.6).

Implementation of Mitigation Measures GEO-1 and GEO-2 would reduce impacts associated with unstable soil conditions to below a level of significance through soil remediation activities as recommended in the Christian Wheeler Geotechnical Report (2005).

Would the project result in:	Impact Analyzed in the 2009 EIR	Impact Not Examined in 2009 EIR		
		No Impact	Less Than Significant Impact	Potentially Significant Impact
a. Exposure of people or structures to geological hazards, including rupture of a known earthquake fault, strong seismic ground shaking, seismic-related ground failure, including liquefaction, and/or landslides?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. On- or off-site landslides, lateral spreading, subsidence, liquefaction or collapse from construction of project on a geologic unit or soil that is unstable or that would become unstable as a result of the project?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Substantial soil erosion or the loss of topsoil?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- a) The project site is not located on any known active or potentially active fault traces. Other active fault zones in the region that could possibly affect the project site include the Coronado Bank, San Jacinto, Elsinore and San Andreas Fault Zones. Due to the distance of these faults from the project site, project construction would not result in ground surface rupture at any of these faults. As required by Chapter 15.04 of the City's Municipal Code, the proposed project would be constructed in compliance with the California Building Code (CBC), which contains specific requirements for seismic safety. Consistent with the 2009 EIR, project compliance with these policies would avoid any potential for seismic hazards and impact would be less than significant.

In addition, as discussed in the Geotechnical Investigation prepared for the proposed project by Geocon Incorporated (October 2020) (Appendix E), the risk associated with landslide hazards at the site is low. In addition, the risk associated with liquefaction and seismically induced settlement beneath the proposed building is negligible due to planned remedial grading, shallow depth to granitic rock, and lack of groundwater beneath the building. Consistent with 2009 EIR, impacts would be less than significant.

Therefore, the project would not result in any new significant environmental effects or a substantial increase in the severity of previously identified significant effects regarding geological hazards.

- b) According to the project-specific Geotechnical Investigation (Appendix E), the surficial soil types located at the project site consist of artificial fill, topsoil, alluvium and colluvium. These soil types are unsuitable in their present condition for support of fill and/or structural loads and would require remedial grading in the form of removal and compaction where improvements are planned. As discussed in a) above, the proposed project would not result in hazards from landslides or liquefaction.

Consistent with the 2009 EIR, implementation of the proposed project would result in a potentially significant impact associated with unstable soils. Mitigation Measures GEO-1 and GEO-2 require soil remediation prior to the construction of the any new improvements. Mitigation Measures GEO-1 and GEO-2 have been updated to refer to the Recommended Grading Specifications identified in the Geotechnical Investigation (Appendix E). Implementation of Mitigation Measures GEO-1 and GEO-2 would reduce impacts to less than significant. Therefore, the project would not result in any new significant environmental effects or a substantial increase in the severity of previously identified significant effects regarding unstable soils.

- c) The proposed project would involve construction activities that would result in ground disturbance, including excavation, grading, and soil removal. Consistent with the 2009 EIR, the proposed project would comply with the City's Municipal Code and the CBC, which

regulate excavation activities, construction of foundations and retaining walls, and grading activities including drainage and erosion control. In addition, implementation of the proposed project would result in an increase in impervious surfaces on the project site from development of the distribution warehouse and surface parking areas. The proposed project would comply with all applicable regulations, including the City's Standard Urban Stormwater Management Plan and Stormwater Management and Erosion Control Ordinance. The proposed project would implement construction site erosion and sedimentation control BMPs as needed to minimize erosion and topsoil loss. Consistent with the 2009 EIR, proposed project compliance with these regulations during construction and operation would provide adequate protection against soil erosion during and after site construction. Therefore, the proposed project would not result in any new significant environmental effects or a substantial increase in the severity of previously identified significant effects regarding soil erosion or loss of topsoil.

3.6 Global Climate Change and Energy

Section 4.6 of the 2009 EIR evaluated the potential for global climate change and energy impacts associated with implementation of the 2009 project and concluded that implementation would result in less than significant impacts related to the contribution of greenhouse gas (GHG) emissions and the cumulative effect of global climate change (Section 4.6.4). In addition, implementation of the 2009 project would have a less than significant impact related to energy consumption (Section 4.6.5). No mitigation measures were required for global climate change and energy impacts as described in the 2009 EIR.

	Impact Analyzed in the 2009 EIR	Impact Not Examined in 2009 EIR		
		No Impact	Less Than Significant Impact	Potentially Significant Impact
a. Would implementation of the proposed project contribute significantly to global climate change?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Would the proposed project be impacted by the effects of global climate change?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Would implementation of the proposed project result in the wasteful, inefficient and unnecessary consumption of energy?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

a) Construction

Similar to the 2009 project, construction of the proposed project would include grading, paving, building construction, and architectural coating activities. A GHG and Energy Technical Memorandum was prepared for the proposed project by Harris & Associates (January 2021) (Appendix F). GHG emissions from construction and operation of the proposed project were estimated using CalEEMod, Version 2016.3.2, based on project assumptions provided by the project applicant. This model replaced the previously used URBEMIS Model

and includes an estimate of carbon dioxide equivalent (CO₂e) and GHG emissions from water and wastewater use, solid waste, and area sources. Construction of the proposed project is estimated to result in total GHG emissions of 763 metric tons (MT) CO₂e compared to 2,960 MT CO₂ under the 2009 project. Therefore, total GHG emissions from proposed project construction would be reduced compared to the emissions identified for the 2009 project and the impact would be less than significant.

Operation

The proposed project is calculated to result in fewer operational trips, the largest source of project GHG emissions, compared to the number of trips identified for the 2009 project. The 2009 project would generate 3,704 average daily trips. In comparison, the proposed project would result in 1,994 average daily trips. CalEEMod default assumptions were used to estimate the remaining emissions sources. Table 6 shows a comparison of operational GHG emissions associated with electricity use, natural gas use, and vehicular emissions between the 2009 project and the proposed project.

Table 6. Proposed Project Operational Greenhouse Gas Emissions

Emissions Source	Annual Emissions (MT/year)
Area	0.017
Energy	340.27
Mobile	3,362.70
Waste	67.04
Water	186.54
Proposed Project Total CO₂e Emissions	3,956.58
2009 Project Total CO₂e Emissions	14,795

Source: Appendix F.

Notes: CO₂e = carbon dioxide equivalent; MT = metric ton

As shown in Table 6, GHG emissions from the proposed project would not result in an increase in operational GHG emissions compared to those accounted for in the 2009 EIR. The net change in calculated annual GHG emissions is a reduction of 10,838 MT CO₂ compared to the GHG emissions identified in the 2009 EIR.

Additionally, the 2020 modeling is conservative and does not take into account the site user's corporate sustainability policy, which sets a goal to reach zero net carbon by 2040 by setting an interim target to use 100 percent renewable energy by 2025 ([User]. n.d.). The user intends to meet these goals by installing on-site solar panels, pursuing green building certifications, using carbon neutral packaging (50 percent of shipments net zero carbon by 2030), and electrifying their transportation fleet (10,000 electric vehicle fleet by 2022 and 100,000 by 2030). In addition, the project is located less than a half-mile from the San Diego Metropolitan Transit System San Diego Trolley Stop, Gillespie Field Station. Gillespie Field Station is

located on the Green Line. The location provides the opportunity for employees to use alternate transportation to further reduce emissions from vehicle trips. The project would be required to comply with the California Green Building Standards Code (CALGreen), which includes, but is not limited to, energy efficiency and electric vehicle parking requirements. The project would also provide bicycle racks for employees.

Therefore, the operational GHG emissions associated with the proposed project would be reduced compared to the GHG emissions identified in the 2009 EIR and the impact would be less than significant. The project would not result in any new significant environmental effects or a substantial increase in the severity of previously identified significant effects regarding GHG emissions.

- b) Impacts of global climate change, including biological resources, sea-level rise, natural disasters, and potable water supply, that could affect the proposed project are summarized below.

Biological Resources

As discussed in Section 3.3(d), the project site is surrounded on all sides by residential, commercial, and transportation development and is unlikely to function as a wildlife corridor or habitat linkage. Consistent with the 2009 EIR, construction of the proposed project would not block any existing wildlife corridors that would negatively impact the ability for animals to adapt to global climate change and impact would be less than significant.

Sea-Level Rise

The City of San Diego's Vulnerability Assessment report estimated that the City of San Diego may experience between 1.6 to 2.5 feet of sea-level rise by the year 2050 and between 3.3 and 6.5 feet by the year 2100 (City of San Diego 2020). Although the projections show greater levels of sea-level rise since the 2009 EIR was prepared (estimated between 4 and 30 inches), the project location has not changed. The project site is inland and, after construction, would be elevated to a minimum of 358 feet above mean sea level (SanGIS 2020). Consistent with the 2009 EIR, based on the site's geographic location, potential rising sea levels would have a less than significant impact on the proposed project.

Natural Disasters

As discussed in the 2009 EIR, climate change could result in increased flooding and weather-related disasters. No changes in the flood zone designations intersecting the project site have occurred since certification of the 2009 EIR. The project site would be designed to handle the flows of a 100-year storm event to avoid flooding on site. Consistent with the 2009 EIR, the impact of climate change related to natural disasters on the proposed project would be less than significant.

Potable Water Supply

The proposed project is anticipated to generate a small demand for water due to operational uses. In addition, due to the decrease in the project size, water demand would decrease compared to demand identified for the 2009 project. Moreover, the proposed project would not directly induce population growth, which is a greater determinant for water demand. As required by state mandates and consistent with the 2009 project, the proposed project would install drought-tolerant native plant material for landscaping, which would require less water than non-native landscape materials. These efforts would reduce the magnitude of the impact that a climate-induced water shortage would have on the proposed project. Consistent with the 2009 EIR, the impact would be less than significant.

Therefore, the proposed project would not result in any new significant environmental effects or a substantial increase in the severity of previously identified significant effects regarding global climate change on the project.

- c) Construction and operational energy consumption associated with the proposed project are addressed separately below.

Construction

As described in Section 1.3, the proposed project development would be smaller than the 2009 project, and the total construction effort to build the project would be reduced. Construction would not result in GHG emissions beyond those accounted for in buildout of the 2009 project. Therefore, it can be assumed that fuel use would be reduced as well. Project construction would also not necessitate the use of construction equipment that would be less energy efficient than comparable construction sites in the region or state. Consistent with the 2009 EIR construction would not result in wasteful, inefficient, or unnecessary consumption of energy and the impact would be less than significant.

Operation

Transportation Energy Demand

As discussed above in Section 3.6(a), the proposed project is calculated to result in fewer operational trips compared to the number of trips identified for the 2009 project and it can be assumed that less fuel would be consumed than what was identified for the 2009 project. Therefore, consistent with the 2009 EIR, the project's transportation energy demand would not result in the wasteful, inefficient and unnecessary consumption of energy.

Building Demand

Because the proposed project development is significantly smaller than the 2009 project, it can also be assumed that building energy demand associated with the operation of the warehouse

and office space would be less than what was identified for the 2009 project. The site user's corporate sustainability policy would further minimize energy use by expanding building control system technology and real-time data analytics to optimize heating and cooling systems ([User]. n.d.). As such, the proposed project would result in reduced energy use compared to the energy use identified for 2009 project during operation. Therefore, consistent with the 2009 EIR, the proposed project's building energy demand would not result in the wasteful, inefficient and unnecessary consumption of energy.

Natural Gas Energy Demand

As is the case for building energy demand, because the proposed project development is significantly smaller than the 2009 project, it can be assumed that the natural gas energy demand associated with the operation of the distribution warehouse and office space would be less than what was identified for the 2009 project. Therefore, consistent with the 2009 EIR, the project's natural gas energy demand would not result in the wasteful, inefficient and unnecessary consumption of energy.

Therefore, the proposed project would not result in any new significant environmental effects or a substantial increase in the severity of previously identified significant effects regarding wasteful, inefficient and unnecessary consumption of energy.

3.7 Hazards and Hazardous Materials

Section 4.7 of the 2009 EIR evaluates the potential for hazards and hazardous materials impacts associated with implementation of the 2009 project and concludes that construction activities would result in a potentially significant impact related to safety hazard from aircraft operations (Section 4.7.6). Operation of the proposed project would not result in a significant safety hazard for people working in the area due to proximity to the Gillespie Field airport (Section 4.7.6). The 2009 project would result in less than significant impacts related to transport or disposal of hazardous materials, reasonably foreseeable upset or accident conditions involving the release of hazardous materials or be located on a listed hazardous materials site compiled pursuant to California Government Code, Section 65962.5 (Section 4.7.4); pose a health risk to nearby schools (Section 4.7.6) or expose people or structures to a significant risk involving wildland fires (Section 4.7.8). The 2009 project would not result in an impact related to impairing implementation of or physically interfering with an adopted emergency response plan or emergency evacuation plan (Section 4.7.5).

Implementation of Mitigation Measure HAZ-1, which requires the coordination with the Gillespie Field Airport Manager, would reduce the impact related to safety hazard from aircraft operations to less than significant.

Would the project:	Impact Analyzed in the 2009 EIR	Impact Not Examined in 2009 EIR		
		No Impact	Less Than Significant Impact	Potentially Significant Impact
a. Create a significant hazard to the public or the environment through the routine use, transport, or disposal of hazardous materials?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset or accident conditions involving the release of hazardous materials?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. Result in a safety hazard for people working in the area due to proximity to an airport or private airstrip?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
g. Expose people or structures to a significant risk of loss, injury or death involving wildland fires?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- a) The project proposes to construct a distribution warehouse that may involve the transport, use, and disposal of hazardous materials as part of everyday operations. Examples may include the use, fuels associated with delivery trucks, and typical household cleaners for general cleaning and maintenance activities. Similar to the 2009 project, these materials would be contained, stored, and used on site in accordance with manufacturers' instructions, applicable standards and federal, state and local regulations including the preparation of a hazardous materials business plan, as required by the Hazardous Materials Release Response Plans and Inventory Act. Consistent with the 2009 EIR, the proposed project would not create a significant hazard to the public or environment through the transport, use, and disposal of hazardous materials. Therefore, the project would not result in any new significant environmental effects or a substantial increase in the severity of previously identified significant effects regarding routine transport, use, or disposal of hazardous materials.
- b) As described in the 2009 EIR, a Phase I Environmental Assessment identified a leaking underground storage tank in the vicinity of the project site that may result in a significant hazard to the project site (Rincon 2008a). Subsequent groundwater well testing determined

that it is unlikely that impacted soil or groundwater is present beneath the project site at concentrations that would require remediation (Rincon 2008b).

A Phase I and Phase II Environmental Site Assessment (ESA) was prepared for the proposed project by Geocon Incorporated (December 2020) (Appendix G). The ESA identified a recognized environmental condition related to the U.S. Navy's use of the eastern and southcentral portions of the project site as a firing range from approximately 1942 to 1944. As part of the Phase II ESA, soil samples were collected at 27 locations on the project site. The soil samples were analyzed and did not identify lead at concentrations exceeding the California Department of Toxic Substance Control screening level for lead in commercial/industrial soil (Appendix G). Therefore, no additional investigation of site soil related to the former firing range was required, and no impact would occur. Therefore, consistent with the 2009 EIR, implementation of the proposed project would not create a significant hazard to the public or the environment related to the accidental release of hazardous materials during construction activities.

Similar to the 2009 project, construction equipment that would be used to build the proposed project has the potential to release oils, greases, solvents, and other finishing materials through accidental spills. Spill or upset of these materials could have the potential to impact surrounding land uses; however, federal, state, and local controls have been enacted to reduce the effects of such potential hazardous materials spills. Compliance with these requirements is mandatory as standard permitting conditions, and would minimize the potential for the accidental release or upset of hazardous materials, thus ensuring public safety. Consistent with the 2009 EIR, construction-related activities of the proposed project would not result in the release of hazardous materials into the environment.

As discussed in Section 3.7(a) operation of the proposed project would involve an unquantifiable, but limited, use of potentially hazardous materials. Compliance with applicable regulations would serve to protect against a significant and irreversible environmental change that could result from the accidental release of hazardous materials. Consistent with the 2009 EIR, operation-related activities would not result in the release of hazardous materials into the environment. Therefore, the project would not result in any new significant environmental effects or a substantial increase in the severity of previously identified significant effects regarding accidental release of hazardous materials.

- c) The project site is not located on a list of hazardous materials site compiled pursuant to California Government Code, Section 65962.5, and would not create a significant hazard to the public or environment. Therefore, the proposed project would not result in any new significant environmental effects or a substantial increase in the severity of previously identified significant effects regarding hazardous material sites.

- d) Similar to the 2009 project, it is not anticipated that road or lane closures along Weld Boulevard or Cuyamaca Street would be required for construction of the proposed project. Construction staging would be accommodated on the project site and would not affect surrounding roads. Further, the project would provide emergency access in accordance with the requirements of the City of El Cajon Fire Department. Consistent with the 2009 EIR, implementation of the proposed project would not interfere with an adopted emergency response or evacuation plan. Therefore, the project would not result in any new significant environmental effects or a substantial increase in the severity of previously identified significant effects regarding emergency response or evacuation plan.
- e) The project site is located adjacent to the Gillespie Field airport and is located in the airport influence area. A portion of the proposed project site is located in the Runway Protection Zone (RPZ), which includes land use restrictions for safety issues. A RPZ is an area of risk resulting from aircraft takeoff and landing. The only land uses considered to be compatible with the restrictions required of the RPZs are: vacant land, natural park and recreational areas or habitat and special preservations areas; public rights-of-way; agriculture, except livestock, and sand and gravel extraction; storage facilities, not including flammables, explosives and corrosives, and low-intensity land uses characterized by a low number of employees and customers per square foot of building area. The RPZ that extends onto the project site is located in an area on the eastern side of the project site that includes a large detention basin. The proposed distribution warehouse building, driveways, and parking would not be located within the RPZ. Additionally, areas immediately adjacent to the airport are zoned with height limits of 35–50 feet. The warehouse building would have a maximum building height of 30 feet. The proposed project would be compatible with land use restrictions for an RPZ and would not exceed the allowable height limit of the site. Consistent with the 2019 EIR, operation of the proposed project would not result in a significant safety hazard.

Construction of the proposed project would require the use of a crane that would extend beyond 35 feet above the ground that would pose a potential hazard to aircraft operations. Mitigation Measure HAZ-1 identified for the 2009 project requires the coordination with the Gillespie Field Airport Manager to ensure that appropriate actions are taken so that construction activities on the project site do not pose a hazard to air navigation. The Federal Aviation Administration (FAA) would also be required to approve the use of a crane during construction. Therefore, a significant impact would not occur.. Thus, the proposed project would not result in any new significant environmental effects or a substantial increase in the severity of previously identified significant effects regarding airport hazards.

- f) The project site is not located within 0.25 mile of an existing or proposed school. The closest school is Prospect Avenue School, which is located at 9303 Prospect Avenue in Santee, approximately 0.35 miles from the project site. Consistent with the 2009 EIR, the proposed

project would not create a significant hazard to the public or environment through the transport, use, disposal, or release of hazardous materials and impacts would be less than significant. Therefore, the proposed project would not result in any new significant environmental effects or a substantial increase in the severity of previously identified significant effects regarding emitting hazardous materials near schools.

- g) The project site is not located adjacent to any open space areas that would be susceptible to wildland fires. The proposed project is located in a developed area of the City of El Cajon on the boundary of a developed area in the City of Santee. According to the County's Fire Hazard Severity Zone maps, the proposed project site is not located within a very high, high, or moderate fire hazard severity zone (County of San Diego 2021). Consistent with the 2009 EIR, the proposed project would not expose people or structures to a significant risk involving wildland fires. Therefore, the project would not result in any new significant environmental effects or a substantial increase in the severity of previously identified significant effects regarding wildland fires.

3.8 Hydrology and Water Quality

Section 4.8 of the 2009 EIR evaluates the potential for hydrology and water quality impacts associated with implementation of the 2009 project and concludes that implementation would result in less than significant impacts related to site drainage and hydrology (Section 4.8.4), water quality (Section 4.8.5), and flood hazard area (Section 4.8.6). No mitigation measures were identified for hydrology and water quality impacts as described in the 2009 EIR.

Would the project:	Impact Analyzed in the 2009 EIR	Impact Not Examined in 2009 EIR		
		No Impact	Less Than Significant Impact	Potentially Significant Impact
a. Alter the existing drainage or hydrology of the site or area in a manner which would result in flooding, exceed the capacity of the stormwater drainage system, or result in substantial erosion or siltation on or off site?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Violate water quality standards or waste discharge requirements, provide substantial additional sources of polluted runoff, or otherwise substantially degrade surface water or groundwater quality during or after construction?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Place habitable structures within the 100-year floodplain or be subject to inundation by levee or dam failure or seiche?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- a) Consistent with the 2009 EIR, construction activities could result in temporary on-site alteration of drainage patterns and temporarily increase erosion and sedimentation in the construction area through a variety of activities, clearing, grading excavation, concrete

pouring, and asphalt surfacing. The proposed project would be required to comply with the City's Stormwater Management and Discharge Control Program Ordinance, City's Stormwater Management Plan, project-specific Stormwater Pollution Prevention Plan, and National Pollutant Discharge Elimination System Construction General Permit requirements to minimize any short-term impacts resulting from alterations of drainage and hydrology during construction.

Development of the project site would convert much of the project site from softscape to hardscape, increasing runoff. Currently 7 percent of the site is impervious surface. Implementation of the proposed project would increase impervious surfaces to 73 percent of the project site. The existing drainage pattern for the site consists of three concentrated flows that discharge at three locations along the property line into Forester Creek. Two off-site flows enter the site along the southern property line, while the third off-site flow lays midpoint on the western boundary. The southeastern channel remains within a well-defined channel and exits the site into Forester Creek within a 48-inch culvert. The southwestern channel discharges onto the site to cause a defined channel that eventually disperse into shallow flow across the site. Approximately half of the site's runoff combines with the flow from this channel before it eventually discharges into a 36-inch culvert to Forester Creek. The western channel discharges and quickly spreads into a shallow flow across the site. The remaining half of the site's runoff contributes to this flow and discharges into Forester Creek through another 36-inch culvert.

Post construction the drainage patterns would change. The drainage would combine the two southerly off-site flows and discharge them into Forester Creek via the 48-inch culvert at the terminus of the southeastern channel. The western channel flow would be undergrounded as part of the project and would be conveyed within a bypass storm drain line that connects to the existing 36-inch culvert. All surface runoff developed on site would be conveyed through an underground storm drain network to the proposed biofiltration basin located near the eastern property line near Forester Creek. The biofiltration basin would be adequately sized to collect and treat the on-site flow prior to discharge into Forester Creek.

As shown in Table 7 peak stormwater runoff volumes would be reduced compared to existing conditions directing a lower amount of stormwater going into the City's storm drain system.

Table 7. Existing and Peak Stormwater Runoff

Existing Condition (cfs)	Proposed Condition (cfs)
177.29	150.22

Notes: cfs= cubic feet per second

Consistent with the 2009 EIR, the proposed project would result in less than significant impacts during operation. Therefore, the proposed project would not result in any new significant

environmental effects or a substantial increase in the severity of previously identified significant effects regarding altering the existing drainage or hydrology.

- b) Consistent with the 2009 EIR, construction activities associated with the project could result in substantial additional sources of polluted runoff which could have short-term impacts on surface water quality. However, adherence to applicable Regional Water Quality Control Board permit regulations, the City's Stormwater Management Plan and the City's Stormwater Management and Discharge Control Ordinance related to stormwater runoff would minimize the potential for pollutants to enter receiving waters during construction.

Construction BMPs for water quality typically include, but are not limited to, the following:

- Proper storage, use, and disposal of construction materials.
- Removal of sediment from surface runoff before it leaves the site by silt fences or other similar devices around the site perimeter.
- Protection of all storm drain inlets downstream of the construction site to eliminate entry of sediment.
- Stabilization of cleared or graded slopes.
- Diversion of runoff from uphill areas around disturbed areas of the site.
- Prevention of tracking soil off site through use of a gravel strip or wash facilities at exit areas.
- Protection or stabilization of stockpiled soils.
- Continual inspection and maintenance of all specified BMPs through the duration of construction.

Operation of the proposed project could also result in an increase in the potential discharge of pollutants to receiving waters. All on-site runoff would be directed to an on-site biofiltration basin located on the eastern property boundary where it is then treated and conveyed to Forester Creek. Consistent with the 2009 EIR, proposed project impacts would be less than significant impact. Therefore, the proposed project would not result in any new significant environmental effects or a substantial increase in the severity of previously identified significant effects regarding the violation of water quality standards.

- c) The northeastern portion of the project site is located in Federal Emergency Management Agency Flood Hazard Zone X. Zone X is located above the base flood elevation and is not located within the 100-year floodplain. Consistent with the 2009 EIR, the proposed project would not place structures within the 100-year floodplain. Therefore, the proposed project would not result in any new significant environmental effects or a substantial increase in the severity of previously identified significant effects regarding flood hazard area.

3.9 Land Use

Section 4.9 of the 2009 EIR evaluated the potential for land use impacts associated with implementation of the 2009 project and concluded that implementation would not result in inconsistencies with the City of El Cajon General Plan or conflict with any applicable land use plan, policy, or regulation (Section 4.9.4) or substantial physical conflict with existing adjacent land uses (Section 4.9.6). In addition, there is no potential for significant impacts related to physically dividing an established community (Section 4.9.5). No mitigation measures were identified for land use impacts as described in the 2009 EIR.

Would the project result in:	Impact Analyzed in the 2009 EIR	Impact Not Examined in 2009 EIR		
		No Impact	Less Than Significant Impact	Potentially Significant Impact
a. A substantial conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project adopted for the purpose of avoiding or mitigating an environmental effect?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. A substantial physical conflict with any applicable habitat conservation plan or natural community conservation plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. The physical division of an established community?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. A substantial physical conflict with existing adjacent land uses?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- a) Consistent with the 2009 EIR, the applicable land use plans, policies, and regulations for the proposed project include the City of El Cajon General Plan 2000, Gillespie Field Specific Plan 291, City of El Cajon Zoning Ordinance, El Cajon Noise Ordinance, Airport Land Use Compatibility Plan (ALUCP) for Gillespie Field, Gillespie Field Airport Land Use Plan (ALP) Update, FAA Advisory Circular 150/5200-33B, City of Santee General Plan, and other regional plans including the SIP, RCP, RTP and the San Diego Basin Plan. The 2009 project resulted in a change to the land use designation for the project site from Open Space (OS) and Special Development Area 1 (SDA-1) to Industrial Park (IP) and from commercial use to warehousing and distribution. The 2009 project also included an amendment to the Gillespie Field Specific Plan 291 that changed the land use designation of the project site from commercial use to warehousing and distribution. Finally, the 2009 project also resulted in a rezone from OS to the Manufacturing (M) zone. The following consistency analysis is based on the current land use and zoning designations as a result of the approval of the 2009 project.

City of El Cajon General Plan 2000

The current land use designation for the project site is IP. The proposed distribution warehouse is consistent with the Industrial Park (IP) land use designation. Therefore, consistent with the

2009 EIR, the proposed project would not result in actions that are inconsistent with the established policies and regulations of the City of El Cajon General Plan.

City of El Cajon Zoning Ordinance

The project site is zoned as M, which is compatible with the following land uses: residential; manufacturing industries; transportation and communication facilities; trade, business, repair and professional services; and resource production. The Zoning Ordinance also identifies requirements for conduct of use, minimum size for each M district, lot requirements, development standards, density, yards, coverage, height, parking and loading, trash areas, walls, landscaping, signs, and on-site lighting. The proposed project has been designed to be consistent with the requirements of the M zone as identified in Chapter 17.50 of the Zoning Ordinance including lot requirements, development standards, density, yards, coverage, height, parking and loading, trash areas, walls, landscaping, signs, and on-site lighting.

El Cajon Noise Ordinance

The El Cajon Noise Ordinance provides performance standards for noise quality within specific zones. Pursuant to Section 17.115.130C, all industrially zoned properties, which includes the M zone, must meet the 75 dB 1-hour average sound level decibel at all times. However, where outdoor noise levels are higher, the allowable sound level is 80 dB conditionally for industrially zoned properties. As described in Section 3.10, Noise, project features would not violate the El Cajon Noise Ordinance.

Airport Land Use Compatibility Plan for Gillespie Field

The ALUCP for Gillespie Field identifies the airport influence area, projected noise contours, flight activity zones, a land use compatibility matrix, and plan recommendations. The ALUCP also identifies RPZs and land uses that are compatible within these zones. The proposed project falls within Runway Safety Zones 1 and 2, each with specific land use restrictions. A large portion of the project site falls within Zone 2: Inner Approach/Departure Zone, while a small portion of the site is located within Zone 1: RPZ. Land use restrictions for Zone 2: Inner Approach/Departure Zone allow for low-intensity nonresidential uses, characterized as attracting few people. The proposed building falls within this zone. Distribution warehouse is considered a low-intensity land use because it is characterized by a low number of employees per square foot, as compared to higher intensity land uses with higher numbers of employees per square foot such as office buildings or hotels.

The portion of the site located within Zone 1 (RPZ) is proposed to be used as a stormwater detention basin and van parking area. No proposed project buildings would be located within this area. Additionally, areas immediately adjacent to the airport are limited to height limits between 35 and 50 feet. The proposed project would have a maximum building height of 30

feet, which would comply with the height limit requirements of the site. Therefore, the proposed project is compatible with ALUCP land use restrictions for Runway Safety Zones 1 and 2 and would not exceed the allowable height limit of the project site. However, similar to the 2009 project, during project construction, the use of cranes or other construction equipment that may extend higher than 35 feet above the ground would pose a potential hazard to aircraft operations. Consistent with the 2009, the proposed project would result a potentially significant impact during construction. Mitigation Measure HAZ-1 require the coordination with the Gillespie Field Airport Manager at least 2 weeks prior to the start of construction-related activities on the project site, and on a bi-weekly basis throughout the construction period, to ensure that appropriate actions are taken so that construction activities at the project site do not pose a hazard to air navigation. Implementation of Mitigation Measure HAZ-1 would reduce impacts to less than significant.

Gillespie Field Airport Layout Plan Update

As mentioned above, the project is located in the Gillespie Field airport influence area and is therefore within the planning area identified in the ALP. The ALP has been developed to be consistent with the guidelines identified in the ALUCP (SDALUC 2010). The proposed project would be consistent with the ALUCP once the Gillespie Field Airport Manager and FAA determines project consistency with this plan. In addition, the proposed project would not develop the project site with uses that are inconsistent with those identified in the ALP. Therefore, consistent with the 2009 EIR, the proposed project would not conflict with the ALP.

FAA AC 150/5200-33B

The proposed project has been designed to comply with AC 150/5200-33B, which recommends that off-airport stormwater management systems be designed and operated to avoid the presence of aboveground standing water. The proposed project's biofiltration basin, located in the eastern area of the site, would be designed, engineered, constructed, and maintained for a maximum 48-hour detention period after storms, up to 100-year storm flows, and remain completely dry between storms. Therefore, consistent with the 2009 EIR, the project would not conflict with AC 150/5200-33B.

- b) The project is not in the County MSCP. The City does not have an approved MSCP Subarea Plan under the County MSCP and is, therefore, not required to comply with the conservation policies included in the program. However, the County MSCP was taken into account during the preparation of the biological resources analysis for the project due to its applicability to the surrounding region. Where appropriate, the project analysis of biological impacts reflects many of the standards established by the County MSCP, including species and vegetation community sensitivities and mitigation where applicable. Consistent with the 2009 EIR, no impacts to local conservation plans would occur from implementation of the proposed project. Therefore, the

proposed project would not result in any new significant environmental effects or a substantial increase in the severity of previously identified significant effects regarding conflict with an applicable habitat conservation plan or natural community conservation plan.

- c) The project proposes the development of a distribution warehouse within an approximately 31.7 acre site. The project would not alter the existing transportation corridors of the area, such as Weld Boulevard and Cuyamaca Street. The proposed project would include the northern extension of Gillespie Way for the purpose of providing access to the site. Consistent with the 2009 EIR, the proposed project would not result in a physical division of an established community and impacts would be less than significant. Therefore, the proposed project would not result in any new significant environmental effects or a substantial increase in the severity of previously identified significant effects regarding physically dividing an established community.
- d) The project proposes the construction of an approximately 142,756-square-foot distribution warehouse. Similar to the 2009 project, land uses surrounding the project site include a mixture of single-family residential uses (10 to 18 dwelling units per acre) to the west, general industrial land uses to the north and south, and Gillespie Field airport to the east. The proposed project would be similar to and compatible with adjacent industrial uses within Gillespie Field airport. Compliance with the City of El Cajon General Plan and Zoning Ordinance; Municipal Code, Section 17.195; and City's Landscape Design requirements would ensure that the proposed project does not conflict with adjacent residential land uses. Consistent with the 2009 EIR, the proposed project would not result in a substantial physical conflict with existing adjacent land uses. Therefore, the proposed project would not result in any new significant environmental effects or a substantial increase in the severity of previously identified significant effects regarding physical conflict with existing adjacent land uses.

3.10 Noise

Section 4.10 of the 2009 EIR evaluated the potential for noise impacts associated with implementation of the 2009 project and concluded that implementation would result in potentially significant impacts from project-generated operational noise to off-site residences (Section 4.10.4). Implementation of the 2009 project would also result in a significant temporary impact from construction equipment noise (Section 4.10.5). Impacts related to transportation noise and exposure of people to excessive aircraft noise would be less than significant (Sections 4.10.4 and 4.10.6).

Mitigation Measure NOI-1 requires heating, ventilation, and air conditioning (HVAC) equipment noise shielding. Mitigation Measure NOI-2 requires construction noise reduction measures to be implemented by the construction contractor. Implementation of Mitigation Measures NOI-1 and NOI-2 would reduce impacts to less than significant.

Would the project result in:	Impact Analyzed in the 2009 EIR	Impact Not Examined in 2009 EIR		
		No Impact	Less Than Significant Impact	Potentially Significant Impact
a. A substantial permanent increase in ambient noise levels or expose persons to noise in excess of standards?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. A substantial temporary or periodic increase in ambient noise levels in the project vicinity?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Exposure of people residing or working in the project area to excessive noise levels resulting from aircraft?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

a) **Transportation Noise Sources**

The proposed project would modify the 2009 project land uses and the proposed operating hours. As with the 2009 project, development of the proposed project could increase noise on the project site and at neighboring land uses as a result of the projected increase in the amount of vehicle trips to and from the site, which would increase traffic noise on area roadways. An updated Noise Technical Memorandum was prepared for the proposed project by Harris & Associates (January 2021) (Appendix H). Consistent with the methods of the 2009 project, acoustical calculations were performed for existing and future traffic volumes along roadway segments most affected by the project using California Vehicle Noise Emission Levels and standard noise modeling equations adapted from the Federal Highway Administration noise prediction model and data from the project-specific Transportation Impact Analysis (Appendix B) (NV5 2020).

Near-Term Scenario

Table 8 summarizes the calculated existing and future project levels with and without the proposed project under typical project operation. Noise levels are indicated at 50 feet from the centerline of each roadway segment. The highest noise level increase due to the proposed project was calculated to be approximately 1.3 dBA along Weld Boulevard from Gillespie Way to Cuyamaca Street compared to 2 dBA under the 2009 project. Similar to the 2009 project, the proposed project-related increase would generally not be audible because differences of less than 3 dBA in noise levels are generally not detected by the human ear. The calculated changes in noise levels do not cause any roadway to exceed the applicable noise compatibility standard for adjacent land uses. Therefore, project-generated traffic would not result in a significant impact on the project site or at neighboring land uses under the near-term typical operation scenario.

Table 8. Typical Conditions Near-Term Future Traffic Noise Levels

Roadway Segment	Existing (dBA CNEL)	Existing + Cumulative Projects (dBA CNEL)	Change in Existing Noise Level Due to Future Projects	Existing + Cumulative + Project (dBA CNEL)	Applicable Threshold (Compatibility Standard (dBA CNEL)/ Increase in dBA CNEL)	Change in Future Noise Level Due to Proposed Project	Significant Impact?
Cuyamaca Street from Prospect Avenue to Weld Boulevard	71.4	71.5	+0.1	71.9	75/≥1.5	+0.4	No
Cuyamaca Street from Weld Boulevard to Bradley Avenue	70.6	70.7	+0.1	71	65 ¹ /≥1.5	+0.3	No
Weld Boulevard from Fanita Drive to Gillespie Way	62.2	62.9	+0.7	63.2	65/≥3	+0.3	No
Weld Boulevard from Gillespie Way to Cuyamaca Street	64	64.4	+0.4	65.8	75/≥3	+1.4	No

Source: Appendix H.

Notes: CNEL = community noise equivalent level; dB = decibel

¹ Land uses along this segment are primarily industrial; however, Chaparral High School is at the intersection of Cuyamaca Street and Bradley Avenue. Therefore, the threshold of 65 dBA CNEL for sensitive receptors is applied to this segment.

Noise levels are given at 50 feet from the roadway centerline.

Table 9 summarizes the calculated existing and future project levels with and without the proposed project under peak-season operation. Noise levels are indicated at 50 feet from the centerline of each roadway segment. The highest noise level increase due to the proposed project was calculated to be approximately 2.1 dBA along Weld Boulevard from Gillespie Way to Cuyamaca Street compared to approximately 2 dBA under the 2009 project and would generally not be audible. Additionally, the calculated changes in noise levels would not cause any roadway to exceed the applicable noise compatibility standard for adjacent land uses. Therefore, project-generated traffic would not result in a significant impact on the project site or at neighboring land uses under the peak-season near-term scenario.

Table 9. Peak-Season Near-Term Future Traffic Noise Levels

Roadway Segment	Existing (dBA CNEL)	Existing + Cumulative Projects (dBA CNEL)	Change in Existing Noise Level Due to Future Projects	Existing + Cumulative + Peak Project (dBA CNEL)	Applicable Threshold (Compatibility Standard (dBA CNEL)/ Increase in dBA CNEL)	Change in Future Noise Level Due to Proposed Project	Significant Impact?
Cuyamaca Street from Prospect Avenue to Weld Boulevard	71.4	71.5	+0.1	72	75/≥1.5	+0.5	No
Cuyamaca Street from Weld Boulevard to Bradley Avenue	70.6	70.7	+0.1	71	65/≥1.5	+0.3	No
Weld Boulevard from Fanita Drive to Gillespie Way	62.2	62.9	+0.7	63.2	65/≥3	+0.3	No
Weld Boulevard from Gillespie Way to Cuyamaca Street	64	64.4	+0.4	66.7	75/≥3	+2.3	No

Source: Appendix H.

Notes: CNEL = community noise equivalent level; dB = decibel

¹ Land uses along this segment are primarily industrial; however, Chaparral High School is at the intersection of Cuyamaca Street and Bradley Avenue. Therefore, the threshold of 65 dBA CNEL for sensitive receptors is applied to this segment.

Noise levels are given at 50 feet from the roadway centerline.

Long-Term Scenario

Table 10 summarizes the calculated existing and future project levels with and without buildout of the proposed project for the long-term cumulative scenario during typical operation. The highest noise level increase due to the proposed project in the long term was calculated to be approximately 0.9 dBA along Weld Boulevard from Gillespie Way to Cuyamaca Street compared to 1 dBA under the 2009 project and would generally not be audible. In addition, the calculated change in noise levels would not cause any roadway to exceed the applicable noise compatibility standard for adjacent land uses. Therefore, the proposed project would not result in a significant impact under the long-term scenario during typical operation.

Table 10. Typical Conditions Long-Term Future Traffic Noise Levels

Roadway Segment	Existing (dBA CNEL)	Existing + Future (dBA CNEL)	Change in Existing Noise Level Due to Future Projects	Existing + Future + Project (dBA CNEL)	Applicable Threshold (Compatibility Standard (dBA CNEL)/ Increase in dBA CNEL)	Change in Future Noise Level Due to Proposed Project	Significant Impact?
Cuyamaca Street from Prospect Avenue to Weld Boulevard	71.4	71.5	+0.1	71.9	75/≥1.5	+0.4	No
Cuyamaca Street from Weld Boulevard to Bradley Avenue	70.6	70.7	+0.1	71	65/≥1.5	+0.3	No
Weld Boulevard from Fanita Drive to Gillespie Way	62.2	66	+3.8	66.4	65/≥1.5	+0.4	No
Weld Boulevard from Gillespie Way to Cuyamaca Street	64	65.9	+1.9	67.0	75/≥1.5	+1.1	No

Source: Appendix H.

Notes: CNEL = community noise equivalent level; dB = decibel

¹ Land uses along this segment are primarily industrial; however, Chaparral High School is at the intersection of Cuyamaca Street and Bradley Avenue. Therefore, the threshold of 65 dBA CNEL for sensitive receptors is applied to this segment.

Noise levels are given at 50 feet from the roadway centerline.

Table 11 summarizes the calculated existing and future project levels with and without buildout of the proposed project for the long-term cumulative scenario during peak-season operation. The highest noise level increase due to the proposed project for the long-term cumulative scenario during peak-season operation was calculated to be approximately 1.7 dBA along Weld Boulevard between Gillespie Way to Cuyamaca Street compared to 1 dBA under the 2009 project. The calculated noise level would not cause any roadway to exceed the applicable noise compatibility standard for adjacent land uses. Therefore, the proposed project would not result in a significant impact under the long-term scenario during peak-season operation.

Table 11. Peak-Season Long-Term Future Traffic Noise Levels

Roadway Segment	Existing (dBA CNEL)	Existing + Future (dBA CNEL)	Change in Existing Noise Level Due to Future Projects	Existing + Future + Peak Project (dBA CNEL)	Applicable Threshold (Compatibility Standard (dBA CNEL)/ Increase in dBA CNEL)	Change in Future Noise Level Due to Proposed Project	Significant Impact?
Cuyamaca Street from Prospect Avenue to Weld Boulevard	71.4	71.5	+0.1	72	75/≥1.5	+0.5	No
Cuyamaca Street from Weld Boulevard to Bradley Avenue	70.6	70.7	+0.1	71	65 ¹ /≥1.5	+0.3	No
Weld Boulevard from Fanita Drive to Gillespie Way	62.2	66	+3.8	66.3	65/≥1.5	+0.3	No
Weld Boulevard from Gillespie Way to Cuyamaca Street	64	65.9	+1.9	67.7	75/≥1.5	+1.8	No

Source: Appendix H.

Notes: CNEL = community noise equivalent level; dB = decibel

¹ Land uses along this segment are primarily industrial; however, Chaparral High School is at the intersection of Cuyamaca Street and Bradley Avenue. Therefore, the threshold of 65 dBA CNEL for sensitive receptors is applied to this segment.

Noise levels are given at 50 feet from the roadway centerline.

Project-generated traffic would not result in a significant impact related to vehicle traffic noise. Additionally, the proposed project would have similar less than significant noise impacts from area roadways and operation of the San Diego Metropolitan Transit System Trolley because industrial land uses are generally not considered to be sensitive to noise, and noise levels are not calculated to exceed 75 dBA community noise level equivalent (CNEL). Therefore, impacts related to transportation noise would be consistent with the noise analysis evaluated in the 2009 EIR.

Operational Noise Sources

Impacts related to the HVAC equipment, parking lots, and truck deliveries would be the same as the 2009 project and are discussed below.

Parking Lot Noise

Similar to the 2009 project, noise sources from project parking lots, including staff and delivery van parking areas, would include car alarms, door slams, radios, and tire squeals. Consistent with the 2009 EIR, noise from these sources was assumed to range from approximately 54 to 69 dBA at a distance of 50 feet. Periodic and temporary noise sources from the parking lot would be different from each other in kind, duration, and location, and therefore, the overall effects would be separate and, in most cases, would not affect the receptors at the same time. Thus, consistent with the 2009 EIR, parking lot noise is considered nuisance noise that would not be significant. However, due to the changes in operating hours compared to those identified for the 2009 project, potential parking lot noise at surrounding residences was evaluated for the proposed project in additional detail. Intermittent parking lot noise would not exceed the applicable 75 dBA standard for existing or proposed industrial land uses; therefore, industrial land uses are not further evaluated below.

The proposed delivery van parking lot would be subject to parking lot noise during limited hours when vans are retrieved for the day (primarily between 9:00 a.m. and 11:00 a.m.) and retired for the evening (primarily between 5:00 p.m. and 9:00 p.m.). Van loading would occur in the van loading area in the morning hours (primarily between 9:00 a.m. and 11:00 a.m.) and would potentially result in higher frequencies of typical noise, such as door slams. A staff parking lot would generate parking lot noise primarily during shift changes, which would occur at several points throughout a 24-hour period. Delivery van operation and associated shift changes would generally be staggered, with some overlap anticipated to occur in the afternoon (5:00 p.m. to 6:00 p.m.).

The proposed project would modify the 2009 project proposed operating hours. Therefore, it is assumed that parking lot noise would also be generated throughout the day, evening, and night; however, noises would be intermittent. The nearest residences to the proposed parking areas are approximately 60 feet west and north of the proposed delivery van parking lot, which would be active during daytime and evening hours. Without the proposed six-foot wall, at these distances, maximum intermittent parking lot noise events would range between 52 and 67 dBA. However, this parking area would surround the proposed building to the west, east, and north so individual noise events would be spread out across the site at varying distances from residences. Van loading would occur during the morning hours. The van loading area would be at least 375 feet from the nearest residence, and noise levels would range from 37 to 52 dBA at the nearest receptors. Maximum parking lot noise associated with delivery vans would

generally not exceed measured ambient daytime and evening noise levels of approximately 62 dBA and 57 dBA, respectively, or the Santee Noise Ordinance evening standard of 65 dBA at any individual receptor.

The nearest residence to the staff parking lot proposed at the southern boundary of the project site would be approximately 780 feet northwest from the lot, and intermittent noise would range from 30 to 45 dBA. Parking lot noise would generally not exceed ambient daytime and evening noise levels or measured ambient nighttime noise levels of 42 dBA at any individual receptor and would not exceed the Santee Noise Ordinance standard of 65 dBA at the nearest residences during evening and nighttime hours.

Therefore, intermittent parking lot noise from the proposed project would not result in a new source of noise that would violate applicable noise ordinances and would result in less than significant impacts. Therefore, impacts related to parking lot noise would be consistent with the noise analysis evaluated in the 2009 EIR.

Heating, Ventilation, and Air Conditioning Equipment

The specifications of the proposed HVAC system are unknown at this time but would be similar to what would be required for the 2009 project because a similar building type is proposed. Noise from new mechanical HVAC equipment was assumed to generate continuous noise levels up to 73 dBA CNEL at a distance of 50 feet. Noise levels up to 73 dBA on the project site would not exceed the limit of 75 dBA during daytime hours established in the El Cajon Noise Ordinance for properties zoned as Industrial. The proposed building would be approximately 530 feet southeast of the nearest sensitive receptor, the single residence north of the project boundary. At this distance, rooftop HVAC noise would be reduced to approximately 53 dBA CNEL compared to 63 dBA CNEL at the nearest residence under the 2009 project and would not exceed the Santee General Plan noise compatibility standard of 65 dBA CNEL for residences.

Truck Delivery

Individual truck deliveries would be similar to the 2009 project; however, operating hours compared to the 2009 project would be different. For the proposed project, there would typically be approximately 21 line-haul trucks delivering packages to the delivery station each night primarily between the hours of 10:00 p.m. and 8:00 a.m. During the holiday season, peak operation may reach up to 48 trucks in a 24-hour period. During both typical and peak-season operations, a maximum of two truck deliveries would occur per hour during nighttime hours. During typical operation, truck trips would generally be limited to two per hour during daytime and evening hours as well. During the peak season, up to eight deliveries are anticipated in a given hour during daytime hours and up to seven during evening hours. The 2009 EIR calculated that truck deliveries would result in noise levels of approximately 68 dBA at 50 feet.

A noise analysis for a facility with similar operation to the proposed project in the County estimated that individual truck deliveries would generate noise levels of 67 dBA at 23 feet (60 dBA at 50 feet) for approximately 15 minutes (Ldn Consulting 2018). Therefore, the 2009 EIR estimate is conservative for the proposed project. The truck docks would be approximately 330 feet southeast of the nearest sensitive receptor, the residence north of the project site. At this distance, noise levels from individual truck deliveries would be reduced to approximately 52 dBA compared to 59 dBA at the nearest residence under the 2009 project. Following project grading, this residence and the project site would be at approximately the same elevation and topography was not included in the noise calculation. Combined noise levels from simultaneous operation of seven trucks (the maximum anticipated during evening or nighttime hours) would be approximately 60 dBA at the nearest receptor. This estimate is conservative and represents a worst-case scenario for multiple truck deliveries. It is likely that trucks would be staggered throughout the hour, so that the actual simultaneous number of trucks would be less than seven, and combined noise from multiple deliveries would be reduced. Noise from truck deliveries would be perceptible at the nearest receptor, but would be short in duration and would not exceed the 65 dBA evening and nighttime screening level for disturbance under the Santee Noise Ordinance. The maximum anticipated truck delivery during a 1-hour period is eight trucks, and would occur during daytime hours. Assuming each truck would operate for 15 minutes, the maximum number of truck deliveries would result in an hourly average noise level of 71 dBA at 50 feet from the truck delivery area. Peak-season truck deliveries would also not exceed the 75 dBA noise level limit for industrial land uses in the El Cajon Noise Ordinance.

Combined Heating, Ventilation, and Air Conditioning and Truck Delivery Noise Sources

The 2009 EIR concluded that combined HVAC and truck delivery noise could result in future noise levels as high as 68 dBA CNEL at nearby residences. As described previously, truck delivery and HVAC noise would result in a similar noise level at 50 feet compared to the noise level identified in the 2009 project. However, due to changes in operating hours compared to the hours identified in the 2009 project, a revised CNEL was calculated for project operation that accounts for nighttime truck deliveries. Assuming peak-season operation, with each truck delivery generating peak noise level for 15 minutes, the proposed project would result in a maximum combined future noise level of 75 dBA CNEL at a point 50 feet from the proposed building and 50 feet from the truck docks. Peak-season noise levels would be reduced to below 65 dBA CNEL beyond 175 feet from the proposed noise sources. The nearest residence is approximately 330 feet north of the proposed truck docks. Therefore, noise levels would not exceed the applicable 65 dBA CNEL noise compatibility standard for residences or the 75 dBA CNEL noise standard for industrial land uses. A significant impact would not occur, and

Mitigation Measure NOI-1 identified for the 2009 project would not be required for the proposed project.

The proposed project would modify the 2009 project land uses and the proposed operating hours. However, it would not include any new project components that would result in additional noise sources beyond what was accounted for in the 2009 EIR analysis. Additionally, Mitigation Measure NOI-1 identified for the 2009 project would not be required for the proposed project. Therefore, the proposed project would not result in any new significant environmental effects or a substantial increase in the severity of previously identified significant effects regarding permanent noise impacts.

- b) Similar to the 2009 project, construction of the proposed project would include grading, building construction, and paving and would use typical construction equipment. The construction period would be reduced compared to the 3-year period assumed for the 2009 project. The 2009 project assumed that cut and fill would be balanced on site. In contrast, the proposed project would require import of fill material; however, truck trips would not exceed the 96 daily trucks trips assumed for project operation. As discussed above in a) increase in traffic would not result in a significant noise increase.

The proposed project would not require any unique or unusual construction practices that were not accounted for in the 2009 EIR. As with the 2009 project, the proposed project would comply with the limits on construction hours of the El Cajon Noise Ordinance. The project applicant would not be subject to the notice requirement of the Santee Noise Ordinance. However, construction would occur throughout the site, particularly during the grading and paving phases that would occur within 300 feet of existing residences. Individual receptors would have limited exposure to heavy construction equipment noise with the potential to generate 85 dBA at 50 feet for more than 10 consecutive days. Consistent with the 2009 EIR, a significant construction noise impact would occur because noise levels from equipment would potentially exceed 85 dBA. Mitigation Measure NOI-2 would reduce temporary noise impacts from construction activities to below a level of significance through compliance with the limits on construction hours established in the Santee Noise Ordinance. Therefore, the project would not result in any new significant environmental effects or a substantial increase in the severity of previously identified significant effects regarding construction noise impacts.

- c) The project proposes similar light-industrial land uses compared to the 2009 EIR. The Gillespie Field ALUCP was updated in 2010. The project site remains within the 65 dBA CNEL noise contour, and warehousing and industrial land uses are considered compatible with noise levels up to 70 dBA CNEL. Noise levels up to 65 dBA CNEL are considered compatible with office areas of industrial land uses (SDALUC 2010). The project would continue to be outside of the 70–75 dBA CNEL noise contour for Gillespie Field. Therefore, impacts related to aircraft noise

would be less than significant and consistent with the aircraft noise analysis evaluated in the 2009 EIR. Therefore, the project would not result in any new significant environmental effects or a substantial increase in the severity of previously identified significant effects regarding aircraft noise impacts.

- d) The proposed project would require the same type of construction activities and equipment as the 2009 project and would not involve the use of pile driving equipment. In addition, no new sensitive receptors have been developed within 200 feet of the construction area. Impacts would be less than significant and would be consistent with the groundborne vibration analysis evaluated in the 2009 EIR. Therefore, the project would not result in any new significant environmental effects or a substantial increase in the severity of previously identified significant effects regarding groundborne vibration impacts.

3.11 Public Services

Section 4.11 of the 2009 EIR evaluates the potential for demand for public services including police and fire protection associated with implementation of the 2009 project. It concluded that implementation of the 2009 project would result in less than significant impacts pertaining to additional police protection facilities (Section 4.11.4) and fire protection facilities (Section 4.11.5). No mitigation measures were identified for public services impacts as described in the 2009 EIR.

Would the project:	Impact Analyzed in the 2009 EIR	Impact Not Examined in 2009 EIR		
		No Impact	Less Than Significant Impact	Potentially Significant Impact
a. Have a demand for police capacity that would result in substantial adverse physical impacts associated with the provision of 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 objectives for police protection?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Have a demand for fire protection result in substantial adverse physical impacts associated with the provision of 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 objectives for fire protection?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- a) The 2009 EIR concluded that the current capacity at the El Cajon Police Department would be able to serve the project site adequately. In addition, the El Cajon Police Department has indicated that it would be able to serve the proposed project. Therefore, the project would not

result in any new significant environmental effects or a substantial increase in the severity of previously identified significant effects regarding police capacity.

- b) The 2009 EIR concluded that the current capacity of the El Cajon Fire Department would be able to serve the project site adequately. In addition, the El Cajon Fire Department has indicated that it would be able to serve the proposed project. Therefore, the project would not result in any new significant environmental effects or a substantial increase in the severity of previously identified significant effects regarding fire protection.

3.12 Traffic

Section 4.12 of the 2009 EIR evaluates the traffic impacts associated with implementation of the 2009 project. It concluded that implementation of the 2009 project would result in direct and cumulative significant impacts to roadway intersections in the project site (Section 4.12.4) and would result in an increase in hazards due to a design feature or incompatible uses (Section 4.12.5). The 2009 EIR also concluded that the project would result in less than significant impacts related to inadequate emergency access (Section 4.12.6) and inadequate parking capacity (Section 4.12.7).

Mitigation Measure TRA-1 requires a contribution of a fair share toward the future signalization of the Fanita Drive/Grossmont College Drive intersection. Mitigation Measure TRA-2 requires the installation of a traffic signal at the Weld Boulevard/Gillespie Way intersection and lane configuration improvements. Mitigation Measure TRA-3 requires that the final certificate of occupancy permit be issued once extension of SR-52 from SR-125 to SR-67 has been completed and is operational. Implementation of Mitigation Measure TRA-1, TRA-2, and TRA-3 would reduce impacts to less than significant.

Would the project:	Impact Analyzed in the 2009 EIR	Impact Not Examined in 2009 EIR		
		No Impact	Less Than Significant Impact	Potentially Significant Impact
a. Cause an increase in traffic that is substantial in relation to the existing traffic load and capacity of the street system?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Exceed, either individually or cumulatively, a level of service standard established for designated roadways?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Substantially increase hazards due to a design feature or incompatible uses?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Result in inadequate emergency access?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. Result in inadequate parking capacity?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- a, b) Construction and operational traffic impacts associated with the proposed project are addressed separately below. A project- specific Transportation Impact Analysis was prepared by Linscott, Law & Greenspan, Engineers, in December 2020 and is provided as Appendix B.

Construction

Similar to the 2009 project, proposed project construction would generate worker-related vehicle trips and heavy-truck trips from the delivery of construction materials. The proposed project would require the import of 20,000 cubic yards of material that would result in an additional 20 truck trips per day during construction. The 2009 project did not require the import of material. However, the additional excavation material hauling trips would be temporary lasting for approximately 20 days during the grading phase of the project and would not result in a substantial increase in traffic volumes. Worker trips, which would be less than the proposed project's operational trips (discussed below), would not result in a significant impact.

Operation

The 2009 EIR determined the amount of project-generated trips based on the proposed square footage. The proposed project would modify the 2009 project land uses and the proposed operating hours. In addition, the construction period would be reduced compared to the 3-year period assumed for the 2009 project. A project-specific Transportation Impact Analysis was prepared by Linscott, Law & Greenspan, Engineers, in December 2020 and is provided as Appendix B.

The following intersections and segments analyzed were based on coordination with the City of El Cajon as these locations would carry the majority of the proposed project traffic.

Intersections

1. Cuyamaca Street/Prospect Avenue
2. Weld Boulevard/Fanita Drive
3. Weld Boulevard/Gillespie Way (Future Western Driveway)
4. Weld Boulevard/Cuyamaca Street
5. Cuyamaca Street/Bradley Avenue
6. Weld Boulevard/Future Middle Associate Driveway
7. Weld Boulevard/Future Eastern Driveway

Segments

Cuyamaca Street

1. State Route 52 to Prospect Avenue
2. Prospect Avenue to Weld Boulevard
3. Weld Boulevard to Bradley Avenue

Weld Boulevard

1. Fanita Drive to Gillespie Way
2. Gillespie Way to Cuyamaca Street

Trip generation estimates for the proposed project were determined by detailed hourly traffic volume projections provided by the applicant. The traffic volume projections include trips associated with associates, trucks, delivery drivers, and delivery vans.

During standard operations, the proposed project is calculated to generate 1,476 ADT with 2 AM peak hour trips (1 inbound/1 outbound) and 91 PM peak hour trips (61 inbound/30 outbound) during the PM peak hour. During peak-season operations, the proposed project is calculated to generate 3,548 ADT with 241 AM peak hour trips (89 inbound/152 outbound) and 456 PM peak hour trips (318 inbound/138 outbound) during the PM peak hour. Standard operations are expected throughout the majority of the year (9 months). However, the peak-season traffic volumes based on Table 2 were used to evaluate the project's potential impacts to the circulation system. Intersections and segments analyzed were based on coordination with the City of El Cajon as these locations would carry the majority of the project traffic.

Table 12 summarizes the near-term (existing plus cumulative projects) plus project peak hour intersection operations. All intersections are shown to continue to operate at LOS D or better with the addition of project traffic and no significant impact would occur. Therefore, the direct impact to the Weld Boulevard/Gillespie Way intersection would not occur under the proposed project as described in the 2009 EIR. Mitigation Measure TRA-2 identified for the 2009 project would not be required for the proposed project. The proposed project would signalize the intersection at Weld Boulevard/Gillespie Way as a project feature as described in Section 1.3.

Table 12. Near-Term Intersection Operations

Intersection	Control Type	Peak Hour	Near-Term Without Project		Near-Term With Project		Δ^c	Impact Type
			Delay ^a	LOS ^b	Delay	LOS		
1. Cuyamaca Street/Prospect Avenue	Signal	AM	53.3	D	53.4	D	0.1	None
		PM	52.2	D	52.3	D	0.1	
2. Weld Boulevard/Fanita Drive	Signal	AM	12.2	B	12.3	B	0.1	None
		PM	11.7	B	11.7	B	0.0	
3. Weld Boulevard/Gillespie Way/Western Driveway	MSSC ^d /Signal ^e	AM	15.1	B	14.1	B	(1.0)	None
		PM	12.1	B	11.9	B	(0.2)	
4. Weld Boulevard/Cuyamaca Street	Signal	AM	37.3	D	41.7	D	4.4	None
		PM	33.9	C	41.0	D	7.1	
5. Cuyamaca Street/Bradley Avenue	Signal	AM	18.7	B	19.5	B	0.8	None
		PM	17.6	B	18.7	B	1.1	
6. Weld Boulevard/Middle Associate Driveway ^f	MSSC	AM	-	-	0.0	A	-	None
		PM	-	-	14.1	B	-	
	MSSC	AM	-	-	9.4	A	-	None

Table 12. Near-Term Intersection Operations

Intersection	Control Type	Peak Hour	Near-Term Without Project		Near-Term With Project		Δ^c	Impact Type
			Delay ^a	LOS ^b	Delay	LOS		
7. Weld Boulevard/Eastern Driveway ^f		PM	-	-	10.3	B	-	

Source: Appendix B.

Notes:

^a Average delay expressed in seconds per vehicle.

^b Level of Service.

^c Δ denotes the increase in delay due to Project.

^d MSSC = Minor Street Stop Controlled intersection. Worst-Case movement approach delay and LOS reported.

^e The intersection is proposed to be signalized as a Project feature.

^f Intersection does not exist in "without project" conditions.

SIGNALIZED

UNSIGNALIZED

DELAY/LOS THRESHOLDS

DELAY/LOS THRESHOLDS

Delay	LOS	Delay	LOS
0.0 ≤ 10.0	A	0.0 ≤ 10.0	A
10.1 to 20.0	B	10.1 to 15.0	B
20.1 to 35.0	C	15.1 to 25.0	C
35.1 to 55.0	D	25.1 to 35.0	D
55.1 to 80.0	E	35.1 to 50.0	E
≥ 80.1	F	≥ 50.1	F

Table 13 summarizes the Long-Term segment operations. The Long-Term traffic volumes were calculated by applying a 2 percent growth factor to the adjusted Year 2020 traffic volumes. As shown in the table, the study area segments are calculated to operate at LOS D or better both without and with the project. Similar to the 2009 project, the proposed project would not result in a significant impact on any roadway segment under long-term conditions. The proposed project would not result in the cumulative impact to the intersection of Fanita Drive and Grossmont College Drive that was identified in the 2009 EIR. Intersections were generally selected for analysis at locations where the project is expected to add 50 or more new peak hour trips in either direction. The project is not expected to add 50 or more peak hour trips to the intersection of Fanita Drive and Grossmont College Drive, and therefore this intersection was not selected for analysis and no impact would occur. Therefore, Mitigation Measures TRA-1 and TRA-3 identified for the 2009 project would not be required for the proposed project.

Table 13. Long-Term Segment Operations

Street Segment	Capacity (LOS E) ^a	Long-Term			Long-Term + Project		
		ADT ^b	LOS ^c	V/C ^d	ADT ^b	LOS ^c	V/C ^d
Cuyamaca Street							
State Route 52 to Prospect Avenue	57,000	47,120	D	0.827	48,890	D	0.858
Prospect Avenue to Weld Boulevard	37,000	26,640	C	0.720	28,630	C	0.774
Weld Boulevard to Bradley Avenue	57,000	18,430	B	0.498	19,460	B	0.526
Weld Boulevard							
Fanita Drive to Gillespie Way	37,000	8,800	A	0.238	8,980	A	0.243
Gillespie Way to Cuyamaca Street	37,000	8,600	A	0.232	11,900	A	0.322

Source: Appendix B.

Notes:

^a Capacity based on the County of San Diego Roadway Classification & LOS table (see Appendix C in Appendix B).

- ^b Average Daily Trips
- ^c Level of Service.
- ^d Volume to Capacity

The proposed project would not result in substantial effects to the study area intersections or street segments and Mitigation Measures TRA-1, TRA-2, and TRA-3 identified for the 2009 project would not be required for the proposed project. The proposed project would not result in any new significant environmental effects or a substantial increase in the severity of previously identified significant effects regarding LOS impacts.

- c) Vehicle access to the site would be via three driveways on Weld Boulevard. All trucks and vans would enter the site via the eastern driveway. This driveway would only be accessible from the eastern approach of Weld Boulevard and would provide a right turn dedicated lane onto Weld Boulevard. No left turns would be permitted from the eastern driveway onto Weld Boulevard. The western driveway would be located at the intersection of Weld Boulevard and Gillespie Way and would provide egress only for all vans. The intersection would be reconfigured to provide three outbound lanes from the site, a dedicated right turn, left turn and through lane and a dedicated left turn lane. In addition, the project would install a traffic signal at this intersection. The potential intersection hazard impact at the Weld Boulevard/Gillespie Way intersection would not occur under the proposed project as described in the 2009 EIR. Mitigation Measure TRA-2 identified for the 2009 project would not be required for the proposed project.

The middle driveway would be located between Gillespie Way and Cuyamaca Street. This driveway would only provide access to the associates parking lot. The driveway would provide one dedicated right only inbound lane and a right and left outbound lane onto Weld Boulevard. The proposed driveway configurations would ensure that adequate site distances would be provided for drivers leaving the site and would not result in a design features that would cause increased hazards

In addition, a Synchro queue analysis was prepared as part of the project Transportation Impact Analysis in order to ensure that the closely spaced intersections would not result in congestion and backups along Weld Boulevard resulting in increased traffic hazards (Appendix B). The analysis determined there would be adequate vehicle storage space available for traffic traveling westbound on Weld Boulevard to make a left turn at Gillespie Way. In addition, there is adequate storage space for vehicles heading eastbound on Weld Boulevard making a left turn at Cuyamaca Street.

The proposed project would provide improvements to roadways along the perimeter of the project site including the dedication of right-of-way and construction of curb, gutter, and sidewalk improvements on Weld Boulevard along the project site frontage. All roadway improvements would occur within the existing rights-of-way. All improvements would be designed and

constructed according to the City's roadway design standards. These improvements would not result in changes to roadway design that would cause increased hazards.

Consistent with the 2009 EIR, proposed project impacts associated with hazards from design features or incompatible uses would be less than significant. Therefore, the proposed project would not result in any new significant environmental effects or a substantial increase in the severity of previously identified significant effects regarding increase hazards due to a design feature or incompatible uses.

- d) Access to the site would be via three driveways on Weld Boulevard. Emergency vehicles would access the project site via the eastern driveway. In addition, operation of the proposed project would not alter existing emergency access routes to off-site neighboring land uses. Therefore, operation of the proposed project would not result in inadequate emergency access to the project site or adjacent off-site residences and impacts would be less than significant. The proposed project would not result in any new significant environmental effects or a substantial increase in the severity of previously identified significant effects regarding inadequate emergency access.
- e) Similar to the 2009 project, the proposed project would meet the City's parking requirements for the various types of uses proposed on the project site. The number of parking spaces is based on the amount of building square footage. For warehouse uses, a parking ratio of 1.65 space per 1,000 square feet of building space is required. Finally, for office and mezzanine uses, a parking ratio of one space per 300 square feet of building space is required. Based on these parking requirements, the total number of parking spaces required for the proposed project is 296. The project site would be developed with approximately 967 total parking spaces, including designated 335 spaces for associates, support staff, and managers, and 632 spaces for warehouse delivery vans in the northern, eastern, southern, and western outskirts of the project site. Consistent with the 2009 EIR, the proposed project would not result in inadequate parking capacity. Therefore, the proposed project would not result in any new significant environmental effects or a substantial increase in the severity of previously identified significant effects regarding inadequate parking capacity.

3.13 Utilities

Section 4.13 of the 2009 EIR evaluates impacts to utilities, including water, wastewater, drainage, gas and electric, telecommunications, and solid waste associated with implementation of the 2009 project. It concluded that implementation of the 2009 project would not result in a significant impact related to sufficient water supply and infrastructure (Section 4.13.4); wastewater treatment requirements, wastewater treatment capacity, or sewer infrastructure improvements (Section 4.13.5); construction of new stormwater facilities (Section 4.13.6); construction of new natural

gas, electricity or telecommunications facilities (Section 4.13.7); and solid waste disposal (Section 4.13.8). No mitigation measures were identified for utilities impacts in the 2009 EIR.

Would the project:	Impact Analyzed in the 2009 EIR	Impact Not Examined in 2009 EIR		
		No Impact	Less Than Significant Impact	Potentially Significant Impact
a. Have sufficient water supplies to serve the project from existing entitlements and resources, or would new or expanded entitlements be needed?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Require or result in the construction of new water facilities or the expansion of existing facilities, the construction of which could cause significant environmental effects?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Exceed the City of El Cajon's contracted sewer capacity of 10.92 million gallons per day?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Result in a determination by the wastewater treatment provider which serves the project that it has adequate capacity to serve the project's projected demand in addition to its existing commitments?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. Require or result in the construction of new wastewater treatment facilities or the expansion of existing facilities, the construction of which could cause significant environmental effects?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f. Require or result in the construction of new stormwater facilities, the construction of which could cause significant environmental effects?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
g. Energy consumption exceed the capacity of existing facilities such that additional transmission or distribution lines must be installed and/or electrical substations upgraded?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
h. Require or result in the construction or expansion of telecommunications facilities, the construction of which could have an adverse physical effect on the environment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
i. Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

a, b) Implementation of the proposed project would increase potable water usage within the Padre Dam Municipal Water District, however, not beyond levels anticipated in the 2009 EIR. The proposed project is significantly smaller than the 2009 project so it can be assumed that potable water usage associated with operation of a distribution warehouse and office space would be less than the 2009 project. Therefore, the impact would be less than significant and the proposed project would not result in any new significant environmental effects or a substantial increase in the severity of previously identified significant effects regarding water supply and infrastructure.

- c, d, e) Implementation of the proposed project would increase average daily wastewater flow, however, not beyond the future flows calculated in the 2009 EIR. The proposed project is significantly smaller than the 2009 project so it can be assumed that wastewater flows associated with operation of a distribution warehouse and office space would be less than the 2009 project. Therefore, the impact would be less than significant and the proposed project would not result in any new significant environmental effects or a substantial increase in the severity of previously identified significant effects regarding wastewater treatment.
- f) As discussed in Section 3.8, Hydrology and Water Quality, all stormwater facilities conveying project runoff would be located on site and drain directly to Forester Creek. The proposed project would not require or result in the construction or upgrade of any existing off-site stormwater facilities, which may result in a physical impact to the environment. Consistent with the 2009 EIR, the proposed project would result in less than significant impacts. Therefore, the impact would be less than significant and the proposed project would not result in any new significant environmental effects or a substantial increase in the severity of previously identified significant effects regarding the construction of new stormwater facilities.
- g) Similar to the 2009 project, the proposed project would require gas and electricity service from San Diego Gas & Electric, which services the project site. Project construction would include the extension of gas and electric lines from existing facilities located within the Weld Boulevard and Cuyamaca Street rights-of-way and the installation of a transformer. Because the proposed project is significantly smaller than the 2009 project, it can also be assumed that electricity and natural gas demand associated with the operation of the distribution warehouse and office space would be less than the 2009 project. Therefore, the impact would be less than significant and the proposed project would not result in any new significant environmental effects or a substantial increase in the severity of previously identified significant effects regarding electricity or natural gas.
- h) Similar to the 2009 project, the proposed project would require telecommunication service from AT&T, which services the project site. Because the proposed project is significantly smaller than the 2009 project, it can also be assumed that telecommunication demand associated with the operation of the distribution warehouse and office space would be less than the 2009 project. Therefore, the impact would be less than significant and the proposed project would not result in any new significant environmental effects or a substantial increase in the severity of previously identified significant effects regarding telecommunication service.
- i) Implementation of the project would generate solid waste, however, not beyond levels anticipated in the 2009 EIR. The proposed project is significantly smaller than the 2009 project so it can be assumed that solid waste generation associated with operation of a distribution warehouse and office space would be less than the 2009 project. Consistent with the 2009 EIR,

it is anticipated that adequate landfill capacity is currently available and would continue to be available in the future for the solid waste disposal needs of the proposed project. Therefore, the proposed project would not result in any new significant environmental effects or a substantial increase in the severity of previously identified significant effects regarding solid waste disposal.

3.14 Mandatory Findings of Significance

Would the project:	Impact Analyzed in the 2009 EIR	Impact Not Examined in 2009 EIR		
		No Impact	Less Than Significant Impact	Potentially Significant Impact
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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. 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)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- a) All applicable mitigation measures and project design features identified in the 2009 EIR to avoid and reduce impacts are integrated into the project and with the integration of these measures, the project would not substantially degrade the quality of the environment. As described in Section 3.3, Biological Resources, the proposed project would result in direct impacts to San Diego ambrosia as well as permanent impacts to Diegan coastal sage scrub, non-native grassland, disturbed emergent wetland, and non-vegetated channel. Impacts would be addressed with the implementation of the 2009 EIR Mitigation Measures BIO-1, BIO-2, BIO-3, BIO-4, BIO-5, BIO-6, as modified, and Mitigation Measures BIO-5 and BIO-6, as refined in Mitigation Measure BIO-7. Consistent with the 2009 EIR, project impacts to biological resources would be reduced to less than significant.

As described in Section 3.4, Cultural Resources, no historic resources were identified on the project site. During the 2020 pedestrian survey, two of the previously identified sites were relocated. Since intact subsurface deposits, temporally diagnostic artifacts, or other significant

resources or features may still exist, subsurface and ground disturbing activities may adversely impact this resource. Therefore, Mitigation Measure CUL-1 from the 2009 EIR has been revised to ensure that impacts to previously unrecorded cultural resources or human remains remain less than significant. Prior to ground disturbing activities a California Register of Historical Resources evaluation and Unanticipated Discovery Plan would be developed to identify standard operational procedures in the event of the identification of previously unrecorded cultural resources or human remains. An archaeological monitor and a Native American monitor would be present during construction activities that would involve the excavation of over 3 feet into native soil. If an unknown cultural resource is encountered during site development, all construction activities in the vicinity would be suspended. In addition, potential impacts to undiscovered human remains would be addressed by 2009 Mitigation Measure CUL-1. Therefore, the project would not eliminate any examples of the major periods of California history or prehistory.

- b) The 2009 EIR did not identify any significant and unavoidable cumulative impacts. There would not be new significant cumulative impacts from proposed project changes and no conditions have changed, and no new information has become available since certification of the 2009 EIR that would alter the previous analysis.
- c) Effects of the project would not result in substantial adverse effects on human beings beyond those analyzed in the 2009 EIR. No conditions have changed, and no new information has become available since certification of the 2009 EIR that would alter this analysis. All impacts with the potential to affect human beings were determined to be less than significant.



Source: SanGIS Imagery 2017.



Harris & Associates



0 100 200
Feet

Figure 4

Sensitive Plant Species Observations

Weld Boulevard Distribution Center Project

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Source: SanGIS Imagery 2017.



Harris & Associates



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Feet

Figure 5

Biological Resources Impacts

Weld Boulevard Distribution Center Project

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Source: SanGIS Imagery 2017.



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Section 4 **Summary of Applicable Mitigation Measures**

Biological Resources

As described in Section 3.3, Mitigation Measures BIO-1, BIO-2, BIO-3, BIO-4 BIO-5, and BIO-6 have been updated from the 2009 EIR. In addition a new Mitigation Measure BIO-7 has been created. The following are the updated applicable mitigation measures for the proposed project.

BIO-1: Impacts to 1.25 acres of disturbed Diegan coastal sage scrub shall be mitigated at a 1:1 ratio for a total of 1.25 acres of required mitigation. Mitigation shall consist of acquisition of 1.25 acres of Diegan coastal sage scrub at a City of El Cajon-approved mitigation bank within or adjacent to the project's ecoregion. The wildlife agencies and the City of El Cajon shall approve the location and habitat quality of the off-site mitigation site.

BIO-2: Impacts to 23.70 acres of non-native grassland shall be mitigated at a 0.5:1 ratio for a total of 11.85 acres of required mitigation. Mitigation shall consist of the off-site acquisition of 11.85 acres of non-native grassland. The wildlife agencies and the City of El Cajon shall approve the location and habitat quality of the off-site mitigation site.

It is desirable to mitigate impacts by purchasing mitigation credits at banks within the impacts' ecoregion. Although the City of El Cajon is located within the "South County" jurisdiction, no non-native grassland credits are available for purchase within this ecoregion. Therefore, credits shall be purchased in the adjacent (North County) ecoregion. If no non-native grassland credits are available for purchase in either ecoregion, then the equivalent amount of chaparral credits shall be purchased instead of non-native grassland credits.¹

BIO-3: Mitigation for impacts to migratory bird and raptor nesting habitat shall consist of the following: no clearing of eucalyptus woodland shall take place during the nesting migratory bird and raptor breeding season (January 15 through August 31). If clearing is proposed to take place during the breeding season, a preconstruction survey shall be conducted by a qualified biologist to determine if migratory bird and raptor nests (or nest building or other breeding or nesting behavior) occur in the eucalyptus woodland. If no birds or raptors are nesting (which includes nest building or other breeding or nesting behavior) in this area, clearing shall be allowed to proceed. If birds or raptors

¹ The City of El Cajon does not currently have specific parameters or guidelines outlining the required purchase location in regard to ecoregion location or non-allowance for replacement habitat purchase. Because no non-native grassland credits have not been in South County for some time, it is common for non-native grassland credits to be purchased from mitigation banks in North County. It is also common for allowances to be made for substituting higher tier chaparral credits for non-native grassland credits when non-native grassland credits are not available in a specific ecoregion.

are observed nesting (or displaying breeding or nesting behavior), construction shall be postponed until a qualified biologist determines that all nesting (or breeding or nesting behavior) has ceased or until after August 31.

BIO-4: No grading or clearing within 500 feet of a bird or raptor nest during the migratory bird and raptor breeding season (January 15 through August 31) shall occur. All grading permits, improvement plans, and final maps shall state the same. If clearing or grading shall occur during the migratory bird and raptor breeding season (January 15 through August 31), a preconstruction survey shall be conducted by a qualified biologist to determine if migratory birds and raptors occur in the areas impacted by noise. If no birds or raptors are nesting (which includes nest building or other breeding or nesting behavior) in this area, development shall be allowed to proceed. However, if migratory birds or raptors are observed nesting (or displaying breeding or nesting behavior) within 500 feet of construction activities, construction shall (1) be postponed until a qualified biologist determines that all nesting (or breeding or nesting behavior) has ceased or until after August 31, or (2) a temporary noise barrier or berm shall be constructed at the edge of the development footprint to ensure that noise levels are reduced to below 60 dBA Leq (time weighted average of the level of sound in decibels). Alternatively, the use of construction equipment could be scheduled to keep noise levels below 60 dBA Leq in lieu of or in concert with a wall or other noise barrier.

BIO-5: A Water Quality Certification pursuant to Section 401 of the Clean Water Act shall be issued by the Regional Water Quality Control Board as a condition of issuance of the Section 404 permit. Before construction in any areas containing wetland features, the project proponent shall obtain a Water Quality Certification for the project (independent of Section 404 of the Clean Water Act, which does not apply to the project). Any measures required as part of the issuance of the Water Quality Certification shall be implemented.

Compensatory mitigation approved by the Regional Water Quality Control Board shall be implemented to mitigate impacts to aquatic resources. This mitigation shall be in the form of credit purchases at an approved wetlands mitigation bank, in-lieu fee mitigation, or permittee responsible mitigation (including restoration and enhancement of the on-site eastern channel). Should the project select to mitigate on site through improvement of the eastern channel, a Habitat Restoration Plan shall be prepared for the restoration and enhancement of the eastern channel; the Habitat Restoration Plan shall include a 5-year post-restoration monitoring and maintenance program. The Habitat Restoration Plan and monitoring and maintenance program shall be approved by the Regional Water Quality Control Board. The eastern channel mitigation site shall be conserved in perpetuity through an agency-approved conservation easement that

names a regulatory agency (either the Regional Water Quality Control Board or the California Department of Fish and Wildlife) as a third-party beneficiary. An endowment shall be invested that would generate enough annual interest to provide adequate funding for management and monitoring of the restoration site in perpetuity; the endowment shall be calculated using a tool compatible with the Center of Natural Lands Management Property Analysis Record.

Report of waste discharge pursuant to California Water Code, Section 13050, shall be required for the waters of the state determined to be non-jurisdictional under Sections 404 and 401 of the Clean Water Act. Any measures required as part of the issuance of the Report of Waste Discharge shall be implemented.

BIO-6: Authorization for the alteration of streambeds and banks in the state shall be required under Section 1602 of the California Fish and Game Code, and a Streambed Alteration Agreement application shall be required prior to work occurring in California Department of Fish and Wildlife jurisdictional areas. Mitigation requirements determined through the process of obtaining the necessary permits shall be implemented (See BIO-5).

BIO-7: Before the issuance of a site grading permit, impacts to San Diego ambrosia (*Ambrosia pumila*) shall be mitigated. Because there is no federal action or federal jurisdiction on the project, Sections 7 or 10(a) of the federal Endangered Species Act do not apply. However, the following mitigation shall be required to mitigate the direct impact to the 250-stem and 3,000-stem populations of San Diego ambrosia to a level below significance.

The project applicant shall prepare a Translocation Plan for San Diego ambrosia (Appendix C, San Diego Ambrosia Conceptual Mitigation and Translocation Plan, of Appendix C, Biological Technical Report Update). The Translocation Plan shall be prepared by a qualified biologist familiar with the species. An appropriate receiver site shall be selected that contains suitable landscape position (e.g., upper terrace within the floodplain of streams or wetlands or in depressions with seasonally perched groundwater), soils, hydrology, and native vegetation communities for the survival of the species. Receiver site selection shall consider the genetic properties and structure of the translocated population. The receiver site shall be conserved and the translocated population managed in perpetuity.

Translocation shall occur at the appropriate season when the plant expresses itself early in the season (late winter/early spring) and shall provide enough recovery time for the species at the receiver site throughout the growing season. Both the donor and receiver sites shall be surveyed by a qualified biologist familiar with the species and growing

conditions before translocation. The donor and receiver site may require pre-translocation preparation in the form of dethatching and site preparation. Translocation shall be overseen by a restoration ecologist familiar with the species and implemented by a qualified habitat restoration contractor.

Cultural Resources

As described in Section 3.4(a), revisions to Mitigation Measure CUL-1 has been updated from the 2009 EIR. The following are the updated applicable mitigation measures for the proposed project.

CUL-1

- a. **Discovery of Human Remains.** If human remains are found on the project site during grading or excavation, these finds shall be dealt with in accordance with State of California Health and Safety Code, Section 7050.5, and Senate Bill 2641. This code section states that no further disturbance shall occur until the County Coroner has made a determination of origin and disposition pursuant to California Public Resources Code, Section 5097.98. The County Coroner shall be notified of the find immediately. If the human remains are determined to be prehistoric, the Coroner shall notify the Native American Heritage Commission, which shall determine and notify a most likely descendant. The most likely descendant shall complete the inspection of the site within 48 hours of receiving permission from the landowner to inspect the site, and shall discuss and confer with the landowner over reasonable options for treatment.
- b. **Unanticipated Discovery Plan for On-Site Resources.** Prior to ground disturbing activities an Unanticipated Discovery Plan would be developed by a qualified archaeologist to identify standard operation procedures in the event of the identification of previously unrecorded cultural resources or human remain. An archaeological monitor and Native American monitor shall be present for all construction activities where excavation over 3 feet into native soil would occur. In the event a cultural resource is encountered, construction activities in the vicinity of the resource shall be suspended and requirements of the Unanticipated Discovery Plan shall be followed. The resource shall be in place until a qualified archaeologist can examine it and determine appropriate next steps in accordance with the prepared Unanticipated Discovery Plan.

Geological Resources

GEO-1: After site clearing and grubbing has been completed, all fill material, topsoil, subsoil, and younger alluvial deposits shall be removed in the areas to be graded or that will support settlement-sensitive improvements, in compliance with the CBC. In the areas where structures and streets are proposed, the younger alluvium shall be removed to the granitic bedrock, older alluvium, or at least two feet above the groundwater table,

whichever is less. In areas that will be paved for parking or driveway access, material removal shall extend to a depth of 4 feet below subgrade.

GEO-2: Prior to placing any new fill soils or constructing any new improvements in areas that have been cleaned out to receive fill, the exposed soils should be scarified to a depth of 12 inches, moisture conditioned, and compacted to at least 90 percent relative compaction, in compliance with the CBC. In areas supporting fill slopes, keys should be cut into the competent supporting materials. The keys should be at least 12 feet wide and be sloped back into the hillside at least 2 percent.

Refer to the Geotechnical Investigation (Appendix E) for more detailed information regarding soil remediation.

Hazards and Hazards Resources

HAZ-1: At least 2 weeks prior to the start of construction-related activities on the project site, and on a bi-weekly basis throughout the construction period, the construction contractor shall coordinate with the Gillespie Field Airport Manager to ensure that appropriate actions are taken so that construction activities at the project site do not pose a hazard to air navigation. Such actions may include the issuance of a Notice to Airmen (NOTAM) with sufficient lead time to notify pilots of potentially hazardous flight conditions at or around the proposed project site.

Noise

Mitigation Measure NOI-1 identified for the 2009 project would not be required for the proposed project.

NOI-2: The project applicant shall implement the following measures to minimize short-term noise levels caused by construction activities. Measures to reduce construction/demolition noise to the maximum extent feasible shall be included in contractor specifications and shall include, but not be limited to, the following:

- Construction equipment shall be properly outfitted and maintained with manufacturer recommended noise reduction devices to minimize construction-generated noise.
- Stationary construction noise sources such as generators or pumps shall be located at least 100 feet from noise-sensitive land uses, to the extent feasible.
- Lay-down and construction vehicle staging areas shall be located as far from noise-sensitive land uses as feasible.
- Construction activity shall be restricted to occur between the hours of 7:00 a.m. and 7:00 p.m. Monday through Friday, excluding holidays, and 8:00 a.m. and 5:00 p.m. on Saturday.

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Section 5 **References**

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Appendix A. Air Quality Technical Memorandum

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Appendix B. Transportation Impact Analysis

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Appendix C. Biological Technical Report Update

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Appendix D1. Archaeological Resource Management Report

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Appendix D2. Cultural Resources Testing Report

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Appendix E. Geotechnical Investigation

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Appendix F. Greenhouse Gas Emissions and Energy Technical Memorandum

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Appendix G. Phase I and Phase II Environmental Site Assessment

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Appendix H. Noise Technical Memorandum

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