



County of San Diego

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Statement of Reasons for Exemption from Additional Environmental Review and 15183 Checklist Pursuant to CEQA Guidelines §15183

Project Name: Camp Lockett Master Plan and Overlay Zone
Project Record Numbers: PDS2017-POD-17-003
Environmental Log Number: PDS2020-ER-20-00-001
APN(s): 655-100-44-00, 656-030-34-00, 656-030-35-00, 656-030-36-00,
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656-040-73-00, 656-090-10-00, 656-090-12-00, 656-090-13-00,
760-114-03-00

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Project Location:
The Camp Lockett Master Plan and Overlay Zone area is located in the Campo/Lake Morena Planning Area in the south-central unincorporated San Diego County, approximately 39 miles southeast of downtown San Diego. The project area is 0.28-mile north of the international border with Mexico to the south and east of the intersection of State Route 94 (SR 94) and Forrest Gate Road. To the east are the Campo Indian Reservation and the Community of Boulevard (12 miles). To the north are Interstate 8 (7.5 miles) and the community of Pine Valley (14 miles). To the west is the community of Potrero (8 miles).

Project Applicant Name and Address:
County of San Diego, Planning & Development Services
5510 Overland Avenue, Suite 110
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General Plan

Community Plan: Mountain Empire Subregional Plan
Regional Categories: Village, Semi-Rural, No Jurisdiction
Land Use Designations: Rural Commercial, Public/Semi-Public Facilities, Semi-Rural Residential (SR-4), Open Space-Conservation

Zoning

Use Regulation: Heavy Commercial (C37), Service Commercial (C38), Limited Industrial (M52), Mobilehome Residential (RMH), Rural Residential (RR), Open Space (S80), and General Rural (S92)
Minimum Lot Size: (-), 6,000 Square Feet (SF), 10,000 SF, 1 Acre, 4 Acres, 20 Acres
Special Area Regulation: None

Project Summary:

The Camp Lockett Master Plan and Overlay Zone project is a Master Plan and Overlay Zone to renovate and develop Camp Lockett as a historic campus and a local tourism area supported by community amenities, educational programs, and other similar services (project). The project site is in the Campo/Lake Morena Community Plan Area of the Mountain Empire Subregional Plan within the unincorporated San Diego County. Access to the project is provided by local roads connecting to SR-94. Figure 2 of the Master Plan depicts the project site's regional location and Figure 3 of the Master Plan depicts the project vicinity map. For the majority of the project site, water and wastewater would be served by the Campo Water Maintenance District. The Camp Lockett Event and Equestrian Facility, described further in detail below, proposed the use of onsite septic for wastewater.

The Master Plan does not specifically propose development at this time, though it does identify conceptual uses. It is intended to be a planning document that guides the development of the Campo Lockett area. This plan also intends to implement the General Plan by providing a special set of planning policies and development standards. Any new developments within the defined area must be consistent with the Master Plan. The Master Plan provide a policy framework to guide development and design, as well as the implementation of subsequent projects.

Discretionary Actions:

The project requires a Master Plan and a Rezone to place the specific overlay zones on the project site. As part of the Rezone, the project would also place a Historic Area Special Area Designation over portions of the project site.

Project Site Description:

The project site has varying topography with areas of steep slopes. The site slopes average between 5% and 35%, with some areas of site greater than 35% slopes. In addition, the site is physically constrained by steep topography and open space to the west. Historically the site has been used as a United States military encampment and was home of the 10th, 11th, and 28th Calvary during World War II, including the famous "Buffalo Soldiers". Some buildings exist onsite that are proposed as adaptive reuse with the project.

Surrounding Land Uses: The area surrounding the project site is developed with a mix of agricultural and rural residential development and limited industrial development.

Background and Existing Context:

Previously, the County and a group of various non-profit entities, initiated discussions about the future potential for the Camp Lockett area to serve as a center for the Campo community. The Camp Lockett Interest Group (CLIG) was formed as a result and is composed of the Camp Lockett Event and Equestrian Facility (CLEEF), Pacific Southwest Railway Museum (PSRM), Mountain Empire Historical Society (MEHS), San Ysidro Health (SYH), Motor Transport Museum (MTM), and Mountain Empire Unified School District (MEUSD). These entities proposed to use the property for the benefit of the public, to provide additional community services to the Campo area residents, expand educational programs, and preserve the historic aspects of the area. The project will help create a vision for the Camp Lockett area, and guide implementation of the long-range goals and objectives for the site based on the Camp Lockett Framework Management Plan (FMP). This plan was prepared in 2007 and approved by the Board of Supervisors to convey approximately 167 acres of County-owned property to CLEEF in March 2016, and an additional 247 acres to various non-profit entities in July 2016.

The project area includes a development boundary of approximately 194 acres to be redeveloped within the approximate 400-acre Master Plan and Overlay Zone area in Campo. Figures 7 through 16 of the Master Plan depicts the Master Plan and Overlay Zone area (project area) and the location of each of the six members of the CLIG (planning areas). The environmental analysis provided herein considers the impacts of approving the Master Plan and Overlay Zone and associated Rezone at a program level. Other future potential development within the 194-acre development boundary, or outside of the development boundary, would need to be analyzed under a future discretionary action and separate California Environmental Quality Act (CEQA) analysis.

The project area is currently designated under the County's 2011 General Plan Update for the following land uses: Semi-Rural Residential; Rural Commercial; Public/Semi-Public Facilities (P/SP); and Open Space-Conservation (OS-C). Existing zoning designations applicable to the project area include the following: Heavy Commercial (C37); Service Commercial (C38); Limited Industrial (M52); Mobilehome Residential (MH); Open Space (S80); and General Rural (S92).

Under the adopted 2011 General Plan Update, the majority of the site is located within the Rural Village Boundary, with a portion of the northern site designated Semi-Rural. Land uses within the Rural Village Boundary are applied to large open space and very low-density private and public owned lands that provide for agriculture, managed resource production, conservation, and recreation. Rural areas are not appropriate for intensive residential or commercial uses due to significant topographical or environmental constraints, limited access, and the lack of public services or facilities.

The following provides a brief overview of the existing conditions of each of the six planning areas within the project area:

- **CLEEF:** The CLEEF is a non-profit, volunteer-led organization formed by local citizens to operate an equestrian facility within a 167-acre portion of the southern region of the Master Plan and Overlay Zone area. The facility, located within the southernmost portion of Camp Lockett, currently includes a recreated Buffalo Soldiers equestrian obstacle course, a small museum of artifacts, various outdoor arenas, dry camping sites, and the Ferguson House. Existing onsite structures include the Ferguson House Museum, a garage (400 square feet [sf]), a pump house (200 sf), a caretaker's cabin (656 sf), and an obstacle course. Currently, CLEEF boards approximately 5 to 10 horses per week, and has approximately 3,000 visitors per year.

- **PSRM:** The PSRM is a non-profit educational organization dedicated to the preservation and interpretation of railroads as they existed in the Pacific Southwest; the museum houses over 80 pieces of railroad equipment, including steam and diesel locomotives, passenger cars, freight cars, and cabooses within its approximately 129-acre grounds located in the northwestern portion of Camp Lockett. The PSRM site currently includes the restored Campo Depot (13,120 sf), which functions as a train station and gift shop, and includes exhibit halls and display areas showcasing historic railroad cars and locomotives, as well as the Southwest Railway Library. Other facilities include a display area (14,200 sf), library/theater (5,040 sf), train depot (2,000 sf), restroom (1,152 sf), rental house (2,820 sf), and horse barn (3,900 sf). Currently, the PSRM receives approximately 15,000 visitors per year and operates three trains using diesel-electric, each Saturday and Sunday. The train rides travel 4 miles one-way, with between 12,000 and 15,000 rides provided annually.
- **MEHS:** The MEHS is a non-profit historical society and museum located within the Gaskill Brothers' Stone Store Museum located at the intersection of Forest Gate Road and SR-94. The Museum is located north of the development boundary within land leased from the County of San Diego. The building was a central hub of commerce, travel, and ranching from the 1860s to 1920s, and currently acts as a museum commemorating the history of the Gaskill Brothers and other displaced Texans during the Civil War. A parking area (8,000 sf) for visitor use is located at the intersection of SR-94 and Forrest Gate Road. There are currently between 1,500 and 2,000 visitors to the site per year. The existing two-story onsite structure measures 2,160 sf.
- **SYN:** SYH is a non-profit federally qualified health center that operates the San Ysidro Health Community Center in order to provide healthcare in the underserved rural Mountain Empire region. The SYH occupies approximately 122 acres within the Master Plan and Overlay Zone area. The clinic, located in the center of the SYN Planning Area, provides services including California Work Opportunity and Responsibility to Kids Information Network (CalWIN) applications for food stamps, MediCal, senior transport, emergency food boxes, and onsite senior lunches. The Community Center provides meals three times per week, currently serving over 9,000 meals per year. There are 34 existing structures on the SYH property, ranging in size from approximately 675– 9,500 sf.
- **MTM:** The MTM is a non-profit museum founded in 1986, with the primary objective of educating the public by creating awareness of, and appreciation for, the development of the motor transport industry. The museum, which occupies approximately 3.98 acres within the Master Plan and Overlay Zone area, includes the historic Campo Feldspar Mill and four buildings within the central portion of the project area. MTM also preserves, restores, and displays antique trucks, equipment, and artifacts that have influenced the motor transport industry. The four existing structures are each 7,590 sf. The site also includes a baseball field. Currently, the MTM has approximately 100 visitors per month.
- **MEUSD:** The MEUSD encompasses over 660 square miles throughout the Mountain Empire region and includes two Pre-K through 8th grade elementary schools, two Pre-K through 5th grade elementary schools, two 6th through 8th grade middle schools, one high school, and an Alternative Education Program and Transition Program. The MEUSD Planning Area includes approximately 14 acres within the Master Plan and Overlay Zone area. The two closest schools to the development area are Camp Lockett Middle School located north of the development boundary, and Cottonwood Community Day School, located in Pine Valley. Camp Lockett Middle School has a current enrollment of 109 students, and Cottonwood Community Day School has a current enrollment of 5 students.

Detailed Project Description:

The project includes goals and policies as well as establishes new zoning classifications to guide future development within the development area. Expansion of the Camp Lockett Historic District is also included within the project. Each of these components is described further below.

Goals and Policies

Goal 1 Create a community destination.

- Policy 1.1 Create a cohesive and unified district and tourist destination.
- Policy 1.2 Enhance availability and access to community services and amenities.
- Policy 1.3 Bring additional services and housing to seniors.
- Policy 1.4 Expand museum uses.
- Policy 1.5 Provide overnight stay accommodations and camping sites.
- Policy 1.6 Develop facilities suitable for use by large groups.
- Policy 1.7 Expand educational programs for local youth.
- Policy 1.8 Provide entrance signage to identify Camp Lockett.

Goal 2 Revitalize the Campo Community.

- Policy 2.1 Revitalize Camp Lockett with a mix of civic-oriented uses that benefit local residents and promote regional tourism
- Policy 2.2 Encourage local employment opportunities.
- Policy 2.3 Foster small-scale retail opportunities for visitors.

Goal 3 Build on history.

- Policy 3.1 Maintain a link with the historical importance of the site.
- Policy 3.2 Preserve, restore, or recreate prominent elements of Camp Lockett.
- Policy 3.3 Design new buildings that complement existing historic buildings and character.
- Policy 3.4 Protect and interpret historic and prehistoric cultural resources predating Camp Lockett.

Goal 4 Improve circulation and connectivity.

- Policy 4.1 Create uniform wayfinding and signage to identify Camp Lockett as a cohesive district.
- Policy 4.2 Connect entities through an interpretive trail system.
- Policy 4.3 Improve vehicular circulation routes and traffic safety.
- Policy 4.4 Provide additional public parking for visitors.
- Policy 4.5 Explore opportunities to designate or construct future trails.
- Policy 4.6 Evaluate creating connections to both the regional trail network and Pacific Crest Trail.
- Policy 4.7 Reduce vehicle miles traveled for local residents.

Goal 5 Expand active and passive recreation opportunities.

- Policy 5.1 Embrace and enhance access to Chaffee Park.
- Policy 5.2 Expand recreational activities for Campo residents.
- Policy 5.3 Provide amenities to users of the Pacific Crest Trail.

Goal 6 Update historic buildings.

- Policy 6.1 Preserve and adaptively reuse historic buildings.
- Policy 6.2 Maintain integrity of design, materials, workmanship, association, and site layout.
- Policy 6.3 Bring attention to other historic elements and landscape features (e.g. roads, walls, drainage features).
- Policy 6.4 Preserve and protect the old oaks in Chaffee Park from pests to extend their lives.

Goal 7 Protect wildlife habitat.

- Policy 7.1 Preserve and manage the wild oaks.
- Policy 7.2 Minimize conflict and sensitive biological resources.
- Policy 7.3 Locate uses in response to development constraints.
- Policy 7.4 Preserve existing open space.
- Policy 7.5 Encourage use of non-native plants and replacement of non-native plants with low water use native plants.
- Policy 7.6 Identify opportunities to address invasive species and help control vermin.

Proposed Zoning

As noted above, the proposed project involves a Master Plan and Overlay Zone to renovate and develop Camp Lockett as a historic campus and a locally-serving tourism area. The Master Plan and Overlay Zone includes changes to existing zoning that would permit civic, cultural, visitor, and community-oriented uses at the Camp Lockett properties. Changes to zoning classifications for the properties would accommodate future land uses such as museums, historic displays, and community serving facilities such as parks, schools, trails, daycare centers, and community centers. These changes are intended to help revitalize the Campo community.

Under the proposed project, the entire Master Plan and Overlay Zone area would be a rezoned Master Plan, which is used to designate the Master Plan area. In addition, all planning areas would include the Special Area Regulation H (Historic) due to the site's distinction as a historic district on the Local Register (Camp Lockett Historic District) and as a California Historic Landmark (CHL). Zoning classifications allowed under the project are defined in Table 1, and the zoning map for the project site is shown on Master Plan Figure 5. Specific zoning and anticipated development for each of the six planning areas is detailed under their respective discussions below.

Table 1. Proposed and Existing Zoning Classifications for the Camp Lockett Master Plan and Overlay Zone

Use	Description
Residential Uses	
Family Residential	Residential occupancy of living units by families on a weekly or longer basis, including occupancy of dwelling or apartment.
Civic Uses	
Administrative and Professional Services	Offices of private firms or organizations that are primarily used for the provision of professional, executive, management, or administrative services, including administrative offices, legal offices, or architectural firms.
Child Care Center	The care of children in a state-licensed childcare center, including childcare centers, preschools, and day nurseries.
Clinic Services	Provides non-profit medical services to persons afflicted with bodily or mental disease or injury without provision for onsite residence or confinement.
Civic, Fraternal, or Religious Assembly	Meetings and activities attended regularly by and conducted primarily for their members, by nonprofit organizations that may meet during or after regular business hours. Typical uses include meeting places for civic clubs, ethnic associations, social clubs, scouting organizations, churches, mosques, synagogues, temples, or fraternal or veteran's organizations.
Community Recreation	Recreational, social or multi-purpose uses within buildings with no fixed seats and occupancy limited to 500 persons.
Cultural Exhibits and Library Services	Non-profit, museum-like preservation, exhibition of objects of permanent interest in one or more of the arts and sciences, gallery exhibition of works of art or library collection of books, manuscripts, etc., for study and reading.
Essential Services	Services that are necessary to support principal development and involve only minor structures, such as utility lines and/or poles, which are necessary to support principal development. Also includes a public passive park/recreational area.
Group Care	Services provided in facilities and authorized, certified, or licensed by the state to provide board, room, and personal care to 7 or more persons or dependent and neglected children or in facilities authorized to provide daycare services, including halfway houses, intermediate care facilities, and daycare facilities serving more than 50 persons.
Laundry Services	Establishments engaged in the provision of laundering, dry cleaning, or dyeing services, including laundry agencies, diaper services, or linen supply services.
Major Impact Services and Utilities	Public or private services and utilities that have substantial impact. Such uses may be conditionally permitted in any zone when the public interest supersedes the usual limitations placed on land use and transcends the usual restraints of zoning for reasons of necessary location and community-wide interest. Typical places or uses are schools, sanitary landfills, public and private airports, public park/playground/ recreational areas (other than public passive park/recreational areas), hospitals, psychiatric facilities, cemeteries,

Use	Description
	nursing homes, detention and correction institutions, trade schools (with outdoor training facilities) or security, law enforcement, military, paramilitary type training facilities, or field medical training uses.
Small Schools	The education of 7 or more children, adults, elderly persons, or handicapped persons at one time (but not more than 50); but excluding overnight care or uses classified as Group Care or Major Impact Services and Utilities. Typical uses include daycare facilities for the elderly and schools for not more than 50 children or adults.
Transient Habitation	<p>Establishments primarily engaged in the provision of lodging services on a less than weekly basis with incidental food, drink, and other sales and services intended for the convenience of guests. The following are Transient Habitation use types:</p> <p>a. Campground. Campground services involving transient habitation areas for travelers in recreational vehicles or tents, including recreational vehicle parks.</p> <p>b. Lodging. Lodging services involving the provision of room and/or board, including hotels, motels, or transient boarding houses.</p> <p>c. Resort. Resort services including the provision of extensive outdoor recreation and entertainment services especially for vacationers, including resort and recreational facilities, dude ranches, health spas, and resort hotels, motels, and nudist facilities.</p> <p>d. Rental Units. Residences, condominiums, apartments and townhomes that are rented on a daily, weekly, or monthly basis. When used in this way, a rental unit is not occupied by the owner nor is the occupant using the rental unit as his or her primary or permanent residence.</p>
Commercial Uses	
Animal Sales and Services	A property, establishment or place of business primarily engaged in animal-related sales and services. The following are animal sales and services use types: auctioning, grooming, horse stables, kennels, stockyards, and veterinary (large and small animals).
Building Maintenance Services	Establishments primarily engaged in the provision of maintenance and custodial services to firms rather than individuals, including janitorial, landscape maintenance, or window cleaning services.
Convenience Sales and Personal Services	Establishments or places of business primarily engaged in the provision of frequently or recurrently needed small personal items or services for residents within reasonable walking distance, including neighborhood grocery or drug stores.
Civic Plaza	Property owned by a public or non-profit civic organization for purposes of accommodating the public in the conduct of outdoor events of general community interest including, but not limited to, assemblages of persons for: hobby shows; club meetings; the display and/or sale of art and craft objects; farmer's market, home-grown agricultural products only; and passive recreational uses.

Use	Description
Medical Services	Establishments primarily engaged in the provision of personal health services ranging from prevention, diagnosis, and treatment or rehabilitation services provided by physicians, dentists, nurses, and other health personnel as well as the provision of medical testing and analysis services, including medical offices, dental laboratories, or health maintenance organizations.
Participant Sports and Recreation	Establishments or places primarily engaged in the provision of sports or recreation by and for participants. Any spectators would be incidental and on a nonrecurring basis. Includes indoor (conducted within an enclosed building, such as bowling alleys or billiard parlors) and outdoor use types (conducted in open facilities, including golf courses, athletic facilities, carnival facilities, sports fields, health clubs and spas, swimming beaches, swimming pools, and nudist facilities).
Personal Services	Establishments primarily engaged in the provision of informational, instructional, personal improvement, and similar services of a nonprofessional nature but excludes services classified a Spectator Sports and Entertainment, Participant Sports and Recreation, or Transient Habitation. Typical uses include art studios, barber shops, beauty salons, photography studios, massage parlors, vocational schools, trade schools, dance studios, or reducing salons.
Retail Sales	Establishments or places primarily engaged in the sale or rental of goods or merchandise for personal or household use. Includes General (goods for regular or recurring personal or household needs) and Specialty (establishment offering a single type or closely related types of merchandise oriented toward impulse or discretionary purchases, such as crafts, jewelry, antique shops, flower shops, gifts, novelties or souvenirs, beachwear stores, etc.).
Spectator Sports (Limited)	Establishments or places primarily engaged in the provision of cultural, entertainment, athletic, and other events to spectators as well as those involving social or fraternal gatherings. Includes Limited (conducted within an enclosed building with a capacity of 500 people or less) and General (conducted in open facilities or within an enclosed building with a capacity of more than 500 people such as large exhibition halls or sports stadiums).
Wholesaling, Storage and Distribution	Establishments or places of business primarily engaged in wholesaling, storage, distribution and handling of materials and equipment other than live animals and plants and includes mini-warehouses (primarily for individuals to store personal effects); light (wholesale distributors, moving and storage firms); and heavy (open air storage, distribution and handling of materials and equipment).

Planning Areas

Zoning boxes for each of the six planning areas would be identified within the project area. The proposed zoning boxes are intended to identify allowable uses to help implement the vision of the Master Plan, as well as the goals of the individual entities that occupy the planning areas.

In addition, for the purposes of this analysis, buildout assumptions for future development that could occur, or is anticipated to occur, with implementation of the project are also established for each of the planning areas. It is important to note that the buildout assumptions do not constitute actual development proposals, but provide a potential buildout scenario based on the allowable uses and development standards of the proposed zoning, as well as input from CLIG members on facilities or features they may be interested in constructing within their properties. These buildout assumptions are used to analyze the potential physical environmental impacts that may occur within the development boundary due to implementation of the project. Each planning area is described below that details these assumptions along with the zoning classifications assigned.

It should be noted that the details provided below are conceptual; each project would be required to provide specific development details (site plan, plot plan, etc.) that would be subsequently reviewed by PDS to determine which permit type would be required.

Camp Lockett Event Equestrian Facility

Zoning classifications within the CLEEF Planning Area would allow uses to accommodate the Master Plan and Overlay Zone goals and policies, as well as the CLEEF-specific policies. In the Master Plan, CLEEF would be divided into four subareas (see Master Plan Figure 12), as described below.

1. **Ferguson House and Museum.** This area would accommodate Cultural Exhibits and Library Services uses. Specifically, this building would be repurposed to serve as a museum.
2. **Events and Equestrian Activity Area.** The Master Plan would allow for a number of uses in this subarea, including Animal Sales and Services, Spectator Sports and Entertainment, Participant Sports and Recreation, Civic Plaza, Convenience Sales and Personal Services, Community Recreation, Cultural Exhibits and Library Services, and Transient Habitation. Anticipated development would include four additional caretaker accommodations, barrack/restroom buildings, an event space, picnic area with tables, food preparation/kitchen, cultural exhibit stalls, and replica obstacle course. Solar panels may be installed on the roof of the concession building. Automobile and horse trailer parking are also proposed, as is a perimeter walking/jogging trail around the property.

Approximately 30 small events with approximately 30–50 spectators and participants, and 5 larger events with approximately 500 spectators and participants would occur per year. Additionally, one large event with approximately 1,000 spectators and participants would be held once per year. The anticipated number of daily visitors to the CLEEF under the proposed project would be 10–15 per day, for a total of 5,000 per year. Events held at CLEEF would require nighttime lighting, and four portable public address (PA) systems would be used.
3. **Camping.** Transient Habitation and Animal Sales/Services would be allowed in this subarea and would include tent camping and dry camping to support Pacific Crest Trail (PCT) hikers. Eight campsites would be allowed in this area.
4. **Open Space and Recreation Area.** This subarea includes most of the southern and northern areas of the CLEEF Planning Area. These areas would be zoned for Essential Services, and would include open space for potential mitigation, existing and proposed (4) caretaker accommodations, picnic areas, and hiking trails.

Pacific Southwest Railway Museum

To meet the goals and policies identified within the project, PSRM plans to add additional exhibit space, tracks/turntable, display tracks, a roundhouse, campgrounds, indoor and outdoor storage, offices, parking, mechanical shops, and a kitchen. Small retail shops and/or kiosks would operate on Main Street. These uses would be accommodated within the following four subareas (see Figure 10 of Master Plan).

1. **Main Street Retail and Depot.** The proposed uses include Cultural Exhibits/Library Service and Retail uses in this subarea. Future development within this subarea could include the “main street retail,” as well as a mini depot. Provision of a caboose for the public to ride and be conveyed to other parts of the PSRM site would also be available.
2. **PSRM Storage and Exhibit Halls.** There are two areas within PSRM’s property that would include the existing library/theater, covered train warehouse, storage, the depot, shops, campgrounds, and exhibit halls. Allowable uses proposed for this subarea include Cultural Exhibits/Library Services, Wholesaling, Storage, and Distribution as well as Retail Sale (Specialty). Future development occurring under this subarea would include a mine exhibit, additional exhibit space, and parking.
3. **Camping and Recreational Area.** Allowable uses in this subarea include Transient Habitation, Cultural Exhibits, and Library Services in order to accommodate a campground with up to 20 campsites.
4. **Open Space.** The open space subarea is located south of Forest Gate Road and is separated from the rest of the PSRM site. This area has been identified as a space for potential mitigation.

With implementation of the proposed Master Plan and Overlay Zone, it is anticipated that PSRM would accommodate up to approximately 30,000 visitors per year.

Mountain Empire Historical Society

As noted above under *Background and Existing Context*, MEHS leases a property from the County of San Diego (see Master Plan Figure 10). No new structures are proposed as part of the project. MEHS has indicated interest in potentially developing parking for museum visitors, as well as a 1.5-mile hiking trail, which would be located outside of the development boundary and is not analyzed as part of the project. If, at a future date, MEHS decides to develop this trail, subsequent environmental analysis would be required.

San Ysidro Health

SYH proposes to develop a number of new uses within their project area, including children's activities and a new health center (see Figure 8 of Master Plan). To accommodate the goals for this area, the Master Plan and Overlay Zone would assign new zoning classifications within three subareas, as detailed below.

1. **Children's Activity Center.** This subarea is located in the northern portion of the Planning Area, west of the Veteran's Village. Allowable uses include Major Impact Services and Utilities (Public Park/Playground Recreational Areas), Child Care Center, Small School, Group Care, and Participant Sports and Recreation. This area has existing daycare uses and proposes a senior services area, reuse of the children's activity center, and reuse of the swimming pool.
2. **SYH Community Services Center.** Allowed uses would include Administrative and Professional Services, Convenience Sales and Personal Services, Personal Services, Laundry Services, Community Recreation, Small School, Spectator Sports, Major Impact Services and Utilities (Public Park), Medical Services, Group Care, and Building Maintenance Services. Potential future development could include expansion of the Community Center to provide new administrative offices and building services (that could accommodate up to 40 employees), reuse of the SYH facility maintenance center, community services such as a wellness center, senior services, and drug and alcohol classes serving between 200 and 400 people per month. Amenities for residents would also be provided, including Chaffe Park (existing), reuse/restoration of the theater, and a laundromat. Meal service would be offered five times per week as a result of the expanded Community Center.
3. **Open Space.** There are two open space areas within this subarea, one north of subarea 3 and one in the southern portion of the Planning Area. This area would be used for preservation and mitigation, and potentially for an area covering approximately 2,700 sf to provide alternative energy production such as solar or wind for SYH buildings. Allowed uses would be Open Space and Essential Services.

Motor Transport Museum

Allowable uses within the MTM Planning Area would include Community Recreation, Cultural Exhibits and Library Services, as well as Civic, Fraternal or Religious Assembly. The four existing buildings are proposed to be adaptively reused to house 30,360 sf of museum space, community event space, and meeting space for civic clubs, social clubs, and scouting organizations. No new structures would be developed within this planning area. Food service and overnight accommodations for educational uses by the Boy Scouts, the Pacific Crest Trail Association, schools, or trade groups would also be provided, with one overnight event per month anticipated throughout the year, except during the winter months. Between 40 and 60 people are anticipated to attend each event. In addition, MTM's area would also include a visitor parking lot measuring approximately 100 by 50 feet located adjacent to Sheridan Road, or a joint parking area with SYH located in the unpaved overflow lot immediately to the south of the MTM property. The joint lot would connect to the MTM with a pedestrian connection. Solar panels may be installed between Sheridan Road and existing structures. Additionally, the existing fence would be relocated, or one with a compatible design would be installed at the property line. Improvements are expected to increase the number of visitors per month to approximately 250–300.

Mountain Empire Unified School District

Allowable uses under the Master Plan and Overlay Zone for the MEUSD Planning Area include Major Impact Services and Utilities.

Camp Lockett Historic District:

Except for the PSRM site, the rest of the development boundary is part of an existing historic district, the Camp Lockett Historic District, which was listed on the Local Register on October 25, 2003. The Local Register nomination identifies 53 contributing buildings or structures from 1940 to 1949 that retain their historic integrity. A 122-acre portion of the project area was also designated as a CHL in October 2009. This historic landmark district encompasses 62 buildings, structures, and building remnants from 1941 through 1946.

Camp Lockett Historic Landscape District:

As part a future project, the current Camp Lockett Historic District (listed on the Local Register and as a CHL) will be expanded to include the surrounding landscape features, which also make up an important component of the history of the district.

Project Mobility

Access to the overall Camp Lockett Master Plan and Overlay Zone study area is served by the following roadways and intersections:

- Buckman Springs Road is a north-south, two-lane Light Collector roadway, extending from Interstate (I-) 8 to the north to SR-94 to the south. The posted speed limit is 55 miles per hour (mph). Parking restrictions are not posted and there are no sidewalks. The roadway is designated as a Class III bike route.
- Campo Road (SR-94) is an east-west, two-lane highway, extending from Jamacha Road in the City of El Cajon to the west and continuing as Old Highway 80/SR-94 east of the project area. Within the project area, Campo Road is a two-lane undivided roadway with a posted speed limit of 55 mph. Parking restrictions are not posted. Sidewalks are not present; however, the shoulder is paved in some locations. Bicycle facilities are not present. Metropolitan Transit System (MTS) Bus Route 894 serves the corridor from the City of El Cajon to Lake Morena.
- Forest Gate Road is a north-south Local Public Road, extending from Campo Road to the north to the U.S.-Mexico border to the south. Forest Gate Road is a two-lane undivided roadway and transitions to an unmaintained dirt road adjacent to the CLEEF. Parking is not permitted along the roadway.
- Sheridan Road is a north-south running two-lane Local Public Road, extending from Campo Road to the north to Jeb Stuart Road to the south. Sheridan Road is a two-lane undivided roadway. A speed limit is not posted with the exception of signage indicating a speed limit of 25 mph ("6:30 AM to 8:30 PM DAILY") adjacent to the Mountain Empire Community Park and Community Center. Although there are no sidewalks, walking paths/shoulders generally run adjacent to the roadway.

Overview of 15183 Checklist

California Public Resources Code section 21083.3 and California Environmental Quality Act (CEQA) Guidelines Section 15183 provide an exemption from additional environmental review for projects that are consistent with the development density established by existing zoning, community plan or general plan policies for which an Environmental Impact Report (EIR) was certified, except as might be necessary to examine whether there are project-specific significant effects which are peculiar to the project or its site. Section 15183 specifies that examination of environmental effects shall be limited to those effects that: (1) Are peculiar to the project or the parcel on which the project would be located, and were not analyzed as significant effects in a prior EIR on the zoning action, general plan, or community plan, with which the project is consistent, (2) Are potentially significant off-site impacts and cumulative impacts which were not discussed in the prior EIR prepared for the general plan, community plan or zoning action, or (3) Are previously identified significant effects which, as a result of substantial new information which was not known at the time the EIR was certified, are determined to have a more severe adverse impact than discussed in the prior EIR. Section 15183(c) further specifies that if an impact is not peculiar to the parcel or to the proposed project, has been addressed as a significant effect in the prior EIR, or can be substantially mitigated by the imposition of uniformly applied development policies or standards, then an additional EIR need not be prepared for that project solely on the basis of that impact.

General Plan Update Program EIR

The County of San Diego General Plan Update (GPU) establishes a blueprint for future land development in the unincorporated County that meets community desires and balances the environmental protection goals with the need for housing, agriculture, infrastructure, and economic vitality. The GPU applies to all of the unincorporated portions of San Diego County and directs population growth and plans for infrastructure needs, development, and resource protection. The GPU included adoption of new General Plan elements, which set the goals and policies that guide future development. It also included a corresponding land use map, a County Road Network map, updates to Community and Subregional Plans, an Implementation Plan, and other implementing policies and ordinances. The GPU focuses population growth in the western areas of the County where infrastructure and services are available in order to reduce the potential for growth in the eastern areas. The objectives of this population distribution strategy are to: 1) facilitate efficient, orderly growth by containing development within areas potentially served by the San Diego County Water Authority (SDCWA) or other existing infrastructure; 2) protect natural resources through the reduction of population capacity in sensitive areas; and 3) retain or enhance the character of communities within the unincorporated County. The SDCWA service area covers approximately the western one third of the unincorporated County. The SDWCA boundary generally represents where water and wastewater infrastructure currently exist. This area is more developed than the eastern areas of the unincorporated County, and would accommodate more growth under the GPU.

The GPU EIR was certified in conjunction with adoption of the GPU on August 3, 2011. The GPU EIR comprehensively evaluated environmental impacts that would result from Plan implementation, including information related to existing site conditions, analyses of the types and magnitude of project-level and cumulative environmental impacts, and feasible mitigation measures that could reduce or avoid environmental impacts.

Summary of Findings

The Camp Lockett Master Plan and Overlay Zone Project is consistent with the analysis performed for the GPU EIR. Further, the GPU EIR adequately anticipated and described the impacts of the Project, identified applicable mitigation measures necessary to reduce Project specific impacts, and the Project implements these mitigation measures (see [http://www.sdcountry.ca.gov/PDS/gpupdate/docs/BOS_Aug2011/EIR/FEIR_7.00 -
_Mitigation_Measures_2011.pdf](http://www.sdcountry.ca.gov/PDS/gpupdate/docs/BOS_Aug2011/EIR/FEIR_7.00_-_Mitigation_Measures_2011.pdf) for complete list of GPU Mitigation Measures.

A comprehensive environmental evaluation has been completed for the Project as documented in the attached §15183 Exemption Checklist. This evaluation concludes that the Project qualifies for an exemption from additional environmental review because it is consistent with the development density and use characteristics established by the County of San Diego General Plan, as analyzed by the San Diego County General Plan Update Final Program EIR (GPU EIR, ER #02-ZA-001, SCH #2002111067), and all required findings can be made.

In accordance with CEQA Guidelines §15183, the Project qualifies for an exemption because the following findings can be made:

- 1. The Project is consistent with the development density established by existing zoning, community plan or general plan policies for which an EIR was certified.**

The project site is currently designated under the General Plan for the following land uses: Rural Commercial, Public/Semi-Public Facilities, Semi-Rural Residential, and Open Space-Conservation. The Project requires a Rezone for the specific Camp Lockett Master Plan and Overlay Zone and a “H” Special Area Designator due to the site’s distinction as a historic district on the Local Register and as a CHL. All proposed uses are compatible with their respective General Plan land use designations. The project and all future development projects would comply with the County Zoning Ordinance through the majority of development requiring subsequent discretionary permits (i.e. Site Plan, Major Use Permit) and to a lesser extent, through ministerial building permits. The proposed Master Plan and Overlay Zone provides development regulations and design guidelines for the project that would ensure consistency with the surrounding area and would be compatible with the Campo/Lake Morena Community Plan.
- 2. There are no Project specific effects which are peculiar to the Project or its site, and which the GPU EIR Failed to analyze as significant effects.**

As explained further in the 15183 Checklist below, all Project impacts were adequately analyzed by the GPU EIR. The project site includes special effects that are peculiar to the project or its site: 1) sensitive species and vegetation communities; 2) San Diego County Local Register of Historic Places; and 3) Formerly Used Defense Site (FUDS). However, the GPU EIR did analyze each of the above effects: 1) identified as GPU EIR mitigation measures Bio-1.5, Bio-1.6, Bio-2.2 and Bio-2.3; 2) identified as GPU EIR mitigation measures Cul-1.1 and Cul-1.3; and 3) discussed within the GPU EIR under Existing Regulatory Processes and Sites with Known Hazardous Materials Issues. The project could result in potentially significant effects; however, applicable mitigation measures specified within the GPU EIR have been applied to the project.

3. There are no potentially significant off-site and/or cumulative impacts which the GPU EIR failed to evaluate.

The Project is consistent with the County Zoning Ordinance and General Plan land use regulations. The GPU EIR considered the incremental impacts of the Project, and as explained further in the 15183 Exemption Checklist below, no potentially significant off-site or cumulative impacts have been identified which were not previously evaluated.

4. There is no substantial new information which results in more severe impacts than anticipated by the GPU EIR.

As explained in the 15183 Checklist below, no new information has been identified which would result in a determination of a more severe impact than what had been anticipated by the GPU EIR.

5. The Project will undertake feasible mitigation measures specified in the GPU EIR.

As explained in the 15183 Checklist below, the Project will undertake feasible mitigation measures specified in the GPU EIR. These GPU EIR mitigation measures will be undertaken through future discretionary actions compliance with regulations and ordinances or through the future project's conditions of approval.

<hr/> Signature	<hr/> 10/29/20 Date
<hr/> Greg Kazmer Printed Name	<hr/> Planning Manager Title

CEQA Guidelines §15183 Exemption Checklist

Overview

This checklist provides an analysis of potential environmental impacts resulting from the Project. Following the format of CEQA Guidelines Appendix G, environmental effects are evaluated to determine if the Project would result in a potentially significant impact triggering additional review under Guidelines section 15183.

- Items checked “Significant Project Impact” indicates that the Project could result in a significant effect which either requires mitigation to be reduced to a less than significant level or which has a significant, unmitigated impact.
- Items checked “Impact not identified by GPU EIR” indicates the Project would result in a Project specific significant impact (peculiar off-site or cumulative that was not identified in the GPU EIR.
- Items checked “Substantial New Information” indicates that there is new information which leads to a determination that a Project impact is more severe than what had been anticipated by the GPU EIR.

A Project does not qualify for a §15183 exemption if it is determined that it would result in: 1) a peculiar impact that was not identified as a significant impact under the GPU EIR; 2) a more severe impact due to new information; or 3) a potentially significant off-site impact or cumulative impact not discussed in the GPU EIR.

A summary of staff’s analysis of each potential environmental effect is provided below the checklist for each subject area. A list of references, significance guidelines, and technical studies used to support the analysis is attached in Appendix A. Appendix B contains a list of GPU EIR mitigation measures.

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
1. AESTHETICS – Would the Project:			
a) Have a substantial adverse effect on a scenic vista?	<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 type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	<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 type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion:

- 1(a) The GPU EIR concluded this impact to be less than significant with mitigation. A vista is a view from a particular location or composite views along a roadway or trail. Scenic vistas often refer to views of natural lands but may also be compositions of natural and developed areas, or even entirely of developed and unnatural areas, such as a scenic vista of a rural town and surrounding agricultural lands. What is scenic to one person may not be scenic to another, so the assessment of what constitutes a scenic vista must consider the perceptions of a variety of viewer groups.

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

As described in the General Plan Update Environmental Impact Report (GPU EIR; County of San Diego 2011), the County contains visual resources affording opportunities for scenic vistas in every community. Resource Conservation Areas (RCAs) are identified within the GPU EIR and are the closest that the County comes to specifically designating scenic vistas. Many public roads in the County currently have views of RCAs or expanses of natural resources that would have the potential to be considered scenic vistas. Numerous public trails are also available throughout the County. New development can often have the potential to obstruct, interrupt, or detract from a scenic vista.

The project site is located in the Campo/Lake Morena Planning Area in the South-central unincorporated San Diego County. The land within the project development boundary has a mix of agricultural and rural residential development, with limited industrial development. The SR-94, a County General Plan Designated Scenic Corridor, borders the northern portion of the project site. Further discussion on the Scenic Corridor is provided in Aesthetics 1(b).

No RCAs have been designated in the Campo/Lake Morena Planning Area. The closest RCAs located to the project site are the following: Laguna Meadow, approximately 8.4 miles north; Tecate Peak, approximately 10.8 miles west; and Otay Mountains, approximately 10.9 miles west. Due to distance, no impacts would occur to a County RCA. In addition, future projects within the development boundary would be consistent with existing and surrounding development. The project is not located near, within, or visible from, a scenic vista, and none of the future development occurring within the development boundary would substantially change the composition of an existing scenic vista.

As previously discussed, the GPU EIR determined impacts on scenic vistas to be less than significant with mitigation. As the proposed Project would have a less than significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 1(b) The GPU EIR concluded this impact to be less than significant with mitigation. State scenic highways refer to those highways that are officially designated by the California Department of Transportation (Caltrans) as scenic (Caltrans - California Scenic Highway Program). Generally, the area defined within a State scenic highway is the land adjacent to and visible from the vehicular right-of-way. The dimension of a scenic highway is usually identified using a motorist's line of vision, but a reasonable boundary is selected when the view extends to the distant horizon. The scenic highway corridor extends to the visual limits of the landscape abutting the scenic highway.

No Scenic Highways designated by Caltrans are in proximity to the Project site. However, the County General Plan identifies roadways that are designated as scenic corridors within the Conservation and Open Space Element and have been included as part of the County Scenic Highway System. The project site abuts the SR-94, designated as a County Scenic Corridor from SR-125 to I-8 and an eligible State Scenic Highway. For viewers traveling north along SR-94, views are generally obstructed by vegetation and rock outcroppings. However, three proposed exhibit buildings within PSRM would be visible from SR-94. In addition, development proposed within the project site would result in the removal of trees and require grading resulting in changes to the topography. All future development subject to discretionary review would be required to be consistent with the County Guidelines for Determining Significance for Aesthetics and conform to community character. The General Plan Update EIR identified this mitigation measure as Aes-1.3.

Project Mitigation

The following includes the Project Mitigation Measure:

- **Visual Resources Review:** The project shall include design guidelines and community character statements to ensure that new development reflects the character and visions for the Camp Lockett community. All future discretionary projects will require a visual resources review consistent with these guidelines as well as the County Guidelines for Determining Significance for Visual Resources. Development in the project site shall be well designed so as to not degrade or detract from the character of surrounding land and development.

A historical building is visible at the intersection of SR-94 and Forrest Gate Road; however, no changes would occur to the historical building due to the location outside of the project site. In addition, future development within the project site would require a discretionary Site Plan approval or other potential future discretionary actions and associated future environmental review. If the future development has been identified to cause potentially significant impacts resulting in substantially damaging a scenic resource not limited to trees, rock outcroppings, and historic buildings within scenic highway or corridor under CEQA, additional review and analysis would be required. Therefore, with the implementation of project mitigation measures and future discretionary Site Plan Review, the project would not detract from the existing viewshed from a scenic corridor.

As previously discussed, the GPU EIR determined impacts on scenic resources to be less than significant with mitigation. The project determined impacts would be less than significant with mitigation for development conformance with the community character consistent with GPU EIR mitigation measure Aes-1.3. Therefore, the project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 1(c) The GPU EIR concluded this impact to be significant and unavoidable. Visual character is the objective composition of the visible landscape within a viewshed. Visual character is based on the organization of the pattern elements line, form, color, and texture. Visual character is commonly discussed in terms of dominance, scale, diversity and continuity. Visual quality is the viewer's perception of the visual environment and varies based on exposure, sensitivity and expectation of the viewers.

The existing visual character and quality of the Project site and surrounding area can be described as rural residential and natural open space. The topography of the project site is generally flat with steep slopes in the western portion of the project site. A mixture of rural residences, scattered small commercial, agricultural, and recreational uses are also part of the visual character of the area. Existing development is characteristic of a rural area, including simple structures that dominate the landscape. Commercial uses include a small country store, a community center, and museums with gift shops and exhibition halls. The CLEEF entity includes recreational uses such as an equestrian facility and an obstacle course. The PCT travels through portions of the Master Plan area and the development boundary. Future development for the project would be compatible with the existing environment's visual character and quality because it would not dominate the landscape or strongly influence the pattern character of the surrounding environment. While new structures would be introduced into the project area, the structures would be consistent with the existing structures and compatible with the visual character of the surrounding area. Views from a distance would not be interrupted as the project would consist of several small-scale structures that would not dominate the landscape. A viewer is likely to view the proposed development as a component of the overall landscape. The project within the landscape would not detract from or contrast with the existing visual character and/or quality of the surrounding area for the following reasons: the height, mass, and design of the proposed development are consistent with the surrounding area. The proposed development would not increase density and would maintain the same land uses. Proposed development would be subject to goals and policies of the project which aim to maintain integrity of design within the project

site. Therefore, the project would not result in a substantial effect on the existing visual character or quality of the site and its surroundings.

As previously discussed, the GPU EIR determined impacts on visual character or quality to be significant and unavoidable. However, the Project would have a less than significant impact for the reasons detailed above. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 1(d) The GPU EIR concluded this impact to be significant and unavoidable. The project would result in the use of outdoor lighting within the project site, which is located within Zone B of the County of San Diego Light Pollution Code, approximately 16 miles from the Mount Laguna Observatory. However, the project would not adversely affect nighttime views or astronomical observations because the project would conform to the Light Pollution Code (Section 51.201-51.209), including the Zone B lamp type and shielding requirements per fixture, and hours of operation limitations for outdoor lighting and searchlights.

The County of San Diego Light Pollution Code was developed by the County in cooperation with lighting engineers, astronomers, and other experts to effectively address and minimize the impact of new sources light pollution on nighttime views. The standards in the Code are the result of this collaborative effort and establish an acceptable level for new lighting. Compliance with the Code is required prior to issuance of any building permit for any project. Therefore, compliance with the Code ensures that the project would not create a significant new source of substantial light or glare, which would adversely affect daytime or nighttime views in the area.

As previously discussed, the GPU EIR determined impacts from light or glare to be significant and unavoidable. However, the project would have a less than significant impact for the reasons detailed above. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

Conclusion

With regards to the issue area of Aesthetics, the following findings can be made:

1. No peculiar impacts to the Project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. Feasible mitigation measure contained in the GPU EIR (Aes-1.3) have been applied to the project. The mitigation measure, as detailed above, requires future discretionary projects to design all development to conform with the community character through a visual resources review.

Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
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2. Agriculture/Forestry Resources

– Would the Project:

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

☐☐☐

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

☐☐☐

c) Conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland zoned Timberland Production?

☐☐☐

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

☐☐☐

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

☐☐☐

Discussion

2(a) The GPU EIR concluded this impact to be significant and unavoidable. The Project site does not contain lands designated as Prime Farmland, Unique Farmland, or Farmland of Statewide or Local Importance as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program (FMMP) of the California Resources Agency, Department of Conservation. Additionally, the project site is classified as "Urban Built-up Land" or "other land" and are not considered important farmland designations. No existing active agricultural operations exist within the project boundary and the site does not have a history of agricultural use.

The project site does contain County of San Diego Prime and Statewide Significance soil candidates defined by the FMMP. However, much of the site has been developed with structures and has been disturbed. Within these areas, the soil structure and quality has likely been compromised due to soil compaction from development and operation of commercial uses. In addition, future development projects in the project area would be required to obtain Site Plan discretionary permits or other potential future discretionary permits. Future development would be subject to additional analysis under CEQA. Therefore, no potentially significant impact or conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide or Local Importance to a non-agricultural use would occur as a result of this project.

As previously discussed, the GPU EIR determined impacts from direct and indirect conversion of agricultural resources to be significant and unavoidable. However, the proposed Project would have a less than significant impact to agricultural resources. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 2(b) The GPU EIR concluded this impact to be less than significant with mitigation. The existing zoning within the development boundary includes Open Space (S80), Rural Residential (RR), Mobile Home Residential (RMH), Limited Industrial (M52), Heavy Commercial (C37), Service Commercial (C38), and Single-Family, Duplex, Multi and Variable Family Residential (RV), which are not considered to be agricultural zones. The northeastern portion of the PSRM entity is zoned General Rural (S92), which is a residential and agriculture zone intended to provide approximate controls for land with rugged terrain, watershed, dependent on groundwater for water supply, desert, susceptible to fire and erosion, or subject to other environmental constraints. An existing museum is located within the area zoned as S92 within the PSRM entity. The museum has been operated by the PSRM entity for over 30 years; therefore, agricultural operation does not occur within this entity. In addition, the land within the development boundary is not under a Williamson Act Contract, nor is it surrounded by any such land. The closest preserve or Williamson Act Contract is approximately 8 miles east of the project site. Therefore, the project would not conflict with existing zoning for agricultural use, or a Williamson Act Contract.

As previously discussed, the GPU EIR determined impacts from land use conflicts to be less than significant with mitigation. As the proposed Project would have a less than significant impact for the reasons detailed above, the Project would be consistent with the analysis provided in the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 2(c) Forestry Resources were not specifically analyzed under the GPU EIR because Appendix G of the State CEQA Guidelines was amended to include significance criteria for forestry resources after the release of the Notice of Preparation for the GPU EIR. The County of San Diego does not have any existing Timberland Production Zones, and the project area does not contain land zoned for forest lands or timberland. In addition, the outer edge of the Cleveland National Forest is located approximately 4.0 miles to the northwest of the project site. Therefore, project implementation would not conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland production zones.

As previously discussed, Forestry Resources were not specifically analyzed under the GPU EIR because Appendix G of State CEQA Guidelines was amended to include significance criteria for forestry resources after the release of the NOP for the GPU EIR. However, because the Project would have a less than significant impact to forest resources for the reasons detailed above, the Project would not increase impacts identified within the GPU EIR.

- 2(d) Forestry Resources were not specifically analyzed under the GPU EIR because Appendix G of the State CEQA Guidelines was amended to include significance criteria for forestry resources after the release of the Notice of Preparation for the GPU EIR. The project site including any offsite improvements do not contain any forest

lands as defined in Public Resources Code section 12220(g), therefore Project implementation would not result in the loss or conversion of forest land to a non-forest use. In addition, the project is not located in the vicinity of offsite forest resources.

As previously discussed, Forestry Resources were not specifically analyzed under the GPU EIR because Appendix G of State CEQA Guidelines was amended to include significance criteria for forestry resources after the release of the NOP for the GPU EIR. However, because the Project would have a less than significant impact to forest resources for the reasons detailed above, the Project would not increase impacts identified within the GPU EIR.

- 2(e) The GPU EIR concluded this impact to be significant and unavoidable. Agricultural interface issues such as dust, noise, and conflicts with pesticide use typically occur within one-quarter mile of agricultural uses. The Master Plan and Overlay Zone area and surrounding area within a radius of one-quarter mile do not contain any active agricultural operations or lands designated as Prime Farmland, Unique Farmland, or Farmland of Statewide or Local Importance as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency. Therefore, no Prime Farmland, Unique Farmland, Farmland of Statewide or Local Importance, or active agricultural operations would be converted to a non-agricultural use,

As previously discussed, the GPU EIR determined impacts from direct and indirect conversion of agricultural resources to be significant and unavoidable. Forestry resources were not specifically analyzed under the GPU EIR because Appendix G of State CEQA Guidelines was amended to include significance criteria for forestry resources after the release of the NOP for the GPU EIR. However, because the project would have a less than significant impact to Forestry Resources for the reasons detailed above, the Project would not increase impacts identified within the GPU EIR. In addition, the project would be consistent with the analysis within the GPU EIR for Agricultural Resources because it would not increase impacts to Agricultural Resources identified within the GPU EIR.

Conclusion

With regards to the issue area of Agricultural/Forestry Resources, the following findings can be made:

1. No peculiar impacts to the Project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. No mitigation measures contained within the GPU EIR would be required because Project specific impacts would be less than significant. Therefore, the Project would not result in an impact which was not adequately evaluated by the GPU EIR.

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
3. Air Quality – Would the Project:			
a) Conflict with or obstruct implementation of the San Diego Regional Air Quality Strategy (RAQS) or applicable portions of the State Implementation Plan (SIP)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Create objectionable odors affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion:

- 3(a) The GPU EIR concluded this impact to be less than significant. San Diego County is currently designated as a nonattainment area for the federal standards for ozone (O₃) as well as the state standards for O₃, particulate matter less than or equal to 10 microns (PM₁₀), and particulate matter less than or equal to 2.5 microns (PM_{2.5}). The RAQS and the region's portion of the SIP are the region's plans for attainment and maintaining air quality standards. The RAQS and SIP rely on information from CARB and San Diego Association of Governments (SANDAG), including projected growth, in order to project future emissions and determine from that the strategies necessary for the reduction of stationary source emissions through regulatory controls. Projects that propose development that is consistent with the land use designations and growth anticipated by the local general plans and SANDAG are, by definition, consistent with the RAQS and SIP. Projects that propose development that is greater than that anticipated by the local general plans and SANDAG may be in conflict with the RAQS and SIP, and further analysis is required.

The proposed project consists of development within a 194-acre boundary, with the discretionary actions of a Rezone and Master Plan. The project is consistent with the County General Plan. For more information on the project consistency, please see Land Use and Planning 11(b).

The Rezone is required for the project to place the specific overlay zones on the project site, including a Historic Area Special Area Designation over portions of the project site. The specific overlay zones are consistent with the existing County General Plan designations. In addition, the Proposed developments would provide additional recreational and commercial opportunities, as well as amenities for the existing and

planned population. These changes would broaden the uses within the project boundary but would not increase the intensity of uses. These changes would not induce unplanned population growth within the area or increase visitation beyond what is currently planned. Additionally, the project is not proposing expansion into the County's natural and rural areas. The proposed regulatory changes would not increase the density or intensity of land use that would be inconsistent with the General Plan or regional plans for attainment and maintaining air quality standards. Therefore, because the project would not result in population or employment growth beyond that assumed in SANDAG's growth assumptions or in the General Plan projections, the project would not conflict with or obstruct implementation of the RAQS or SIP.

As previously discussed, the GPU EIR determined impacts on air quality plans to be less than significant with mitigation. As the proposed Project would have a less than significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 3(b) The GPU EIR concluded impacts to be significant and unavoidable. In general, air quality impacts from land use projects are the result of emissions from area sources (landscaping and consumer products), energy (natural gas and electricity), transportation (on-road mobile sources), and from short-term construction activities. The County has established Guidelines for Determining Significance for Air Quality which incorporate the San Diego Air Pollution Control District's (SDAPCD) established air quality impact analysis SLTs for all new source review (NSR) in SDAPCD Rule 20.2 and Rule 20.3.

As discussed in Air Quality 3(a), the project would provide additional recreational and commercial opportunities, as well as amenities for the existing and planned population. Emissions from the grading and construction required for the project would be minimal, temporary and localized, resulting in pollutant emissions below the screening-level criteria established by the Guidelines for Determining Significance for Air Quality. In addition, the proposed project area changes would broaden the uses within the project boundary but would not increase the intensity of uses. The proposed regulatory changes would not increase the density or intensity of land use that would be inconsistent with the General Plan or regional plans for attainment and maintaining air quality standards. In addition, any new future projects would require a discretionary Site Plan or other discretionary approval subject to Air Quality review under CEQA.

As previously discussed, the GPU EIR determined significant and unavoidable impacts to air quality violations. However, the Project would have a less than significant impact to air quality violations for the reasons detailed above. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 3(c) The GPU EIR concluded this impacts to be significant and unavoidable. As discussed in Air Quality 3(a), San Diego County is currently in non-attainment for O₃ under the National Ambient Air Quality Standard (NAAQS). San Diego County is also presently in non-attainment for O₃, PM₁₀ and PM_{2.5} under the California Ambient Air Quality Standard (CAAQS). O₃ is formed when volatile organic compounds (VOCs) and nitrogen oxides (NO_x) react in the presence of sunlight. VOC sources include any

source that burns fuels (e.g., gasoline, natural gas, wood, oil), solvents, petroleum processing and storage, and pesticides. Sources of NO_x include any source that burns fuel. Sources of PM₁₀ and PM_{2.5} in both urban and rural areas include the following: motor vehicles, wood burning stoves and fireplaces, dust from construction, landfills, agriculture, wildfires, brush/waste burning, and industrial sources of windblown dust from open lands.

Construction

Air quality emissions associated with the project include emissions of NO_x, VOC, PM₁₀, and PM_{2.5} associated with construction activities, as well as emissions associated with construction trucks and worker vehicles. Grading operations associated with the construction of the project would require a minimum watering of the project site two times per day to reduce fugitive dust under the San Diego Air Pollution Control District (SDAPCD) Rule 55 and would be subject to the County of San Diego Grading Ordinance. However, the maximum level of daily emissions during construction are expected to exceed the VOC screening-level thresholds established by the County Guidelines for Determining Significance for Air Quality. The majority of the construction-related VOC emissions are attributed to the application of architectural coatings. As such, the project would use low-VOC coatings during construction consistent with GPU EIR mitigation measure Air-2.5.

Project Mitigation

The following includes the Project Mitigation Measure:

- Multiple applications of water during grading between dozer/scrapper passes
- Paving, chip sealing or chemical stabilization of internal roadways after completions of grading
- Use of sweepers or water trucks to remove “track out” at any point of public street access
- Termination of grading if winds exceed 25 miles per hour
- Stabilization of dirt storage piles by chemical binders, tarps, fencing or other erosion control
- Use of low-sulfur fuels in construction equipment
- Use of Low-VOC Paints; use of architectural coatings compliant with the San Diego Air Pollution Control District (SDAPCD) Rule 67.

Other construction emissions are expected to be below all other criteria pollutants during construction. After implementation of the above mitigation measure, construction emissions generated by the project during construction would not exceed the County’s screening levels for any criteria pollutants, including VOCs. Therefore, the project would not violate any air quality standard or contribute substantially to an existing or projected air quality violation during project construction.

Operation

Operation of the proposed project would result in emissions of criteria pollutants from motor vehicle travel, onsite combustion of natural gas for space and water heating, consumer products (cleaning supplies, kitchen aerosols, cosmetics, and toiletries), landscaping, and the re-application of architectural coatings. Operational emissions generated by the project are not expected to exceed the screening level thresholds for any criteria pollutants. The project involves additional recreational and commercial

opportunities, as well as amenities for the existing and planned populations. In addition, new construction in the future would be required to obtain either a discretionary Site Plan approval or other discretionary approval subject to air quality review under CEQA.

The project, as well as the past, present and future projects within the surrounding area, have emissions below the screening-level criteria established by the County Guidelines for Determining Significance for Air Quality. Therefore, the construction and operational emissions associated with the project are not expected to create a cumulatively considerable impact nor a considerable net increase of any non-attainment pollutant, including PM₁₀, PM_{2.5}, or any O₃ precursors.

As previously discussed, the GPU EIR determined significant and unavoidable impacts to air quality violations. However, the Project would have a less than significant impact to air quality violations with the incorporation of Project Mitigation for use of low-VOC paint coatings consistent with GPU EIR mitigation measures Air-2.5. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 3(d) The GPU EIR concluded this impact to be significant and unavoidable. Air quality regulators typically define sensitive receptors as schools (Preschool-12th Grade), hospitals, resident care facilities, or day-care centers, or other facilities that may house individuals with health conditions that would be adversely impacted by changes in air quality. The County of San Diego also considers residences as sensitive receptors since they house children and the elderly.

The following sensitive receptors have been identified within a quarter-mile (the radius determined by the South Coast Air Quality Management District in which the dilution of pollutants is typically significant) of the proposed project: low-density residential subdivision northeast of the project site. However, the proposed project does not propose uses or activities that would result in exposure of these identified sensitive receptors to substantial pollutant concentrations and would not place sensitive receptors near carbon monoxide hotspots. Construction would be short-term, sporadic, and transitory, and operations would mostly be related to gasoline-powered passenger vehicles and low emitting uses within the project boundary; therefore, exposure to project-generated emissions is expected to be minimal. The project would also not place receptors within 500 feet of a signalized intersection operating at or below LOS E and therefore would not place sensitive receptors near carbon monoxide hotspots. In addition, the proposed project would not contribute to a cumulatively considerable exposure of sensitive receptors to substantial pollutant concentrations because the proposed project, in combination with past, present, and future projects within the surrounding area, would not result in emissions in excess of the criteria established by the County of San Diego Guidelines for Determining Significance.

As previously discussed, the GPU EIR determined significant and unavoidable impacts to sensitive receptors. However, the project would have a less than significant impact for the reasons detailed above. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 3(e) The GPU EIR concluded this impact to be less than significant. According to CARB's Air Quality and Land Use Handbook, typical land uses that produce sources of odor include sewage treatment plants, landfills, livestock operations, recycling facilities, among other uses. The project does not include any of these uses. Construction of the proposed project may produce discernible odors typical of most construction sites, such as paving, painting, and equipment operation. However, these substances if present at all, would be minimal and temporary. Additionally, material deliveries and heavy-duty haul trucks could create an occasional "whiff" of diesel exhaust for nearby receptors. However, such odors would be a temporary source of nuisance to adjacent uses and would not affect a substantial number of people or violate SDAPCD Rule 51.

Once constructed, CLEEF Planning Area would include expanded equestrian facilities such as arenas, and an obstacle course. The equestrian facility has the potential to generate nuisance odors due to manure and soiled bedding generated on site. However, good housekeeping and best management practices can eliminate nuisance concerns. Manure that is properly handled or composted provides environmental benefits and can be used as a valuable soil amendment. Improper handling and storage of manure, along with odor migration, may lead to offsite nuisance violations. Therefore, conditions consistent with the Guidelines for Determining Significance for Air Quality for the equestrian facility would be applied to the project to reduce potential objectionable odors. The GPU EIR concluded less than significant impacts to objectionable odors due to existing regulations, policies and enforcement measures to reduce odor impacts to nearby receptors. The following project condition is consistent with these measures identified by the GPU EIR.

Project Condition

The following includes the Project Condition of Approval:

- **Manure Management Plan:** Prior to the approval of any future discretionary plan or issuance of any future discretionary permit, the Manure Management Plan shall be reviewed and approved by the Department of Environmental Health (DEH).

With the inclusion of the above condition of approval, the project would not result in objectionable odors affecting a substantial number of people.

As previously discussed, the GPU EIR determined less than significant impacts from objectionable odors. As the proposed Project would have a less than significant impacts with the incorporation of a project condition for a manure management plan consistent with County regulations, policies and enforcement measures identified in the GPU EIR, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

Conclusion

With regards to the issue area of Air Quality, the following findings can be made:

1. No peculiar impacts to the Project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.

3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. Feasible mitigation measures and conditions of approval from the GPU EIR have been applied to the project. These conditions and measures include approval of a Manure Management Plan and the use of low-VOC paint coatings.

Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
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4. Biological Resources – Would the Project:

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

☐☐☐

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

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c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

☐☐☐

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

☐☐☐

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

☐☐☐

Discussion:

- 4(a) The GPU EIR concluded this impact to be significant and unavoidable. A file search and field survey were conducted to assess the presence and potential for presence of vegetation communities, special-status species, and habitat. The data used to assess the site was the following: the County's geographic information system (GIS) records, the County's Comprehensive Matrix of Sensitive Species, photos of the project area, California Department of Fish and Wildlife (CDFW) California Natural Diversity Database (CNDDB), U.S. Fish and Wildlife Service (USFWS) National Wetlands Inventory (NWI), USFWS Carlsbad Fish and Wildlife Office species occurrence data,

the San Diego Natural History Museum's *San Diego County Plant Atlas*, and U.S. Department of Agriculture (USDA) Natural Resources Conservation Service (NRCS) soil survey maps for the project area and surrounding area. In addition, on May 9 and 10, 2018, ICF biologists conducted a habitat assessment and vegetation mapping survey of the 194-acre proposed development boundary. A selection of figures illustrates the known sensitive biological resources in the vicinity. Biological Resources Figures 1a through 1i denote areas that are likely jurisdictional waterways or wetlands. Biological Resources Figures 2a through 2i illustrate the vegetation communities mapped onsite in 2018. Figure 3 displays the USFWS designated critical habitats and known records of species listed under the Endangered Species Act. Figure 4 shows the known records of sensitive plant and animal species from the CNDDDB database. Figure 5 displays the known records of sensitive plant and animal species from the SanBIOS database. The discussion below summarizes the results of the file searches and field survey.

Vegetation Communities

Twelve vegetation communities (Table 2) have been mapped within the project area and are described below. With the exceptions of disturbed habitat and urban/developed, these communities are potential habitat for sensitive plant and animal species and are regarded as sensitive vegetation communities by the County.

Table 2. Vegetation Communities

Vegetation Community	Acres
Big Sagebrush Scrub	3.7
Big Sagebrush Scrub - Disturbed	2.6
Chamise Chaparral	13.4
Chamise Chaparral - Disturbed	7.0
Coast Live Oak Woodland	14.6
Disturbed Habitat	63.5
Disturbed Wetland	0.1
Elderberry Savanna	1.1
Granitic Northern Mixed Chaparral	4.4
Granitic Northern Mixed Chaparral Disturbed	5.5
Non-Native Grassland	0.7
Non-Native Woodland	0.2
Open Coast Live Oak Woodland	4.4
Southern Coast Live Oak Riparian Forest	0.1
Southern Cottonwood Riparian Forest - Disturbed	0.1
Southern Willow Scrub - Disturbed	0.1
Urban/Developed	72.6
Grand Total	194.2

Disturbed Wetland (11200)

Disturbed wetland areas are permanently or periodically inundated with water but have also been significantly modified by humans via artificial structures. An area of disturbed wetland identified within the development boundary included a lined ditch with a few scattered arroyo willows (*Salix lasiolepis*) and less than 2% cover of native species, including yerba buena (*Anemopsis californicus*) and rush (*Juncus* spp.). The overall cover was dominated by non-native annual grasses and mustards. These

areas have the potential to be classified as wetlands under the County Resource Protection Ordinance (RPO).

Disturbed Habitat (11300)

Disturbed habitat areas have been physically disturbed and are no longer recognizable as native or naturalized vegetation association. If vegetation is present, it typically consists of non-native plant species, including ornamentals or ruderal exotic species that take advantage of the disturbance. The habitat onsite was dominated by non-native mustards (*Sisymbrium irio* and *Hirschfeldia incana*) as well as cheeseweed (*Malva parviflora*). Other characteristic species may include thistles (*Centaurea*, *Carduus* and *Cynara* spp.), Russian thistle (*Salsola tragus*), crown daisy (*Glebionis coronaria*), telegraph weed (*Heterotheca grandiflora*), horehound (*Marrubium vulgare*), wild radish (*Raphanus sativa*), and fountain grass (*Pennisetum setaceum*).

Urban/Developed (12000)

Urban/developed areas have been constructed upon or physically altered to an extent that native vegetation can no longer grow. These areas are identified as containing permanent or semi-permanent structures, pavements, or landscaped areas that require irrigation. They are usually unvegetated or landscaped with ornamental species.

Big Sagebrush Scrub (35200)

This habitat type is typically dominated by big sagebrush (*Artemisia tridentata*) with bare ground underneath and between the shrubs. The community is fairly open with soft-woody shrubs reaching 0.5–2 meters tall. In San Diego County, this habitat type often occurs in alluvial washes along the dry margins of the high desert and montane valleys. Soils and terrain can vary from rocky, well-drained slopes to finer-textured valley soils with a high water table. Other species found within this community include four-wing saltbush (*Atriplex canescens*), buckwheats (*Eriogonum* spp.) and grasses such as cheatgrass (*Bromus tectorum*). Areas mapped as disturbed big sagebrush scrub have a similar species composition but generally higher amount of disturbance and non-native plant species. No determination was made regarding the source of disturbance during the May 2018 field surveys. This habitat is uncommon in the County and has potential to support sensitive plant and animal species. Big sagebrush scrub is considered sensitive by the County of San Diego and can support nesting birds, which are protected under state and federal laws.

Granitic Northern Mixed Chaparral (37131)

This habitat type consists of broad-leaved sclerophyll shrubs that are 2–4 meters tall and form dense, nearly impenetrable thickets of vegetation. The dominant species found in this habitat type are scrub oak (*Quercus berberidifolia*), chamise (*Adenostoma fasciculatum*), big berry manzanita (*Arctostaphylos glauca*), and chaparral whitethorn (*Ceanothus leucodermis*). The plants are typically deep-rooted with little to no understory except leaf litter. The defining distinction for this vegetation classification is the occurrence on granitic soils as opposed to mafic soils. This habitat has potential to support sensitive plant and animal species and is considered sensitive by the County of San Diego.

Areas mapped as disturbed granitic northern mixed chaparral have a similar species composition but generally higher amount of disturbance and non-native plant species. The County considers disturbed granitic northern mixed chaparral to be sensitive.

Chamise Chaparral (37200)

Chamise is the overwhelmingly dominant species in this vegetation community of 1- to 3-meter-tall chaparral. Other associated species, such as deerweed (*Acemisson glaber*), California buckwheat (*Eriogonum fasciculatum*), mountain mahogany (*Cercocarpus betuloides*), yerba santa (*Eriodictyon californicum*), hollyleaf cherry (*Prunus ilicifolia*), sugar bush (*Rhus ovata*), laurel sumac (*Malosma laurina*), and various manzanitas (*Arctostaphylos* spp.), sages (*Salvia* spp.), and lilacs (*Ceanothus* spp.) contribute little to the cover. There is a non-existent herbaceous understory in mature, dense stands. This community thrives on shallow, dry soils on xeric slopes and ridges, adjacent to more mesic habitats.¹ This habitat has potential to support sensitive plant and animal species and is considered sensitive by the County of San Diego.

Areas mapped as disturbed chamise chaparral have a similar species composition but generally higher amount of disturbance and non-native plant species. The County considers disturbed chamise chaparral to be sensitive.

Non-Native Grassland (42200)

Non-native grasslands are dominated by non-native grass species, such as bromes (*Bromus* spp.), barley (*Hordeum* spp.), and oat (*Avena* spp.) as well as non-native forbs storkbill (*Erodium* spp.) and mustards (*Brassica* and *Hirshfeldia*). Some native annual, flowering forbs, such as California poppy (*Eschscholtzia californica*), *Gilia* spp., gold fields (*Lasthenia* spp.), lupines (*Lupinus* spp.), and *Phacelia* spp., can be found, especially in years with good rainfall, but grasses will soon be the dominant presence in the dense to sparse species coverage. This habitat type occurs on fine-textured, often clay soils that are moist or even waterlogged during the rainy winter and very dry during the summer and fall. The dominant species within the development boundary was red brome (*Bromus rubens*). This habitat has potential to support sensitive plant and animal species and is considered foraging habitat for sensitive raptors. Non-native grassland is considered sensitive by the County of San Diego.

Southern Coast Live Oak Riparian Forest (61310)

This vegetation community is dominated by coast live oak (*Quercus agrifolia*) and other evergreen sclerophyllous trees, and consists of a dense, closed to nearly-closed canopy. The understory is lacking in shrubs but has a robust amount of herbs. Other species in the development boundary with a high-cover percentage include toyon (*Heteromeles arbutifolia*) and arroyo willow (*Salix lasiolepis*). This habitat is commonly found on fine-grained, rich alluvium soils in the bottomlands and outer floodplains along larger streams of canyons and valleys. This habitat has potential to support sensitive plant and animal species and is considered sensitive by the County of San Diego.

¹ Xeric habitats are adapted to a dry climate and include areas where evaporation exceeds rainfall (areas generally receiving less than 10 inches of rainfall annually). Mesic habitats have a moderate or well-balanced supply of moisture.

Southern Cottonwood-Willow Riparian Forest – Disturbed (61330)

This vegetation community is an open, broadleaved riparian forest dominated by tall cottonwoods (*Populus fremontii*) and several tree willows (*Salix lasiandra* and *S. gooddingii*). The understory is usually made up of shrubby willows, such as arroyo willow, and sandbar willow (*Salix exigua*), and other wetland plants, including California mugwort (*Artemisia douglasiana*), mule fat (*Baccharis salicifolia*), wild cucumber (*Marah macrocarpus*), and stinging nettle (*Urtica dioica*). This habitat is found along sub-irrigated and frequently overflowed lands along rivers and streams with the dominant species requiring moist, bare mineral soils. This habitat has potential to support sensitive plant and animal species, and is considered sensitive by the County of San Diego.

Southern Willow Scrub – Disturbed (63320)

Dominated by arroyo and red willow (*Salix laevigata*), these dense, broadleaved riparian thickets may also contain scattered cottonwoods and sycamores (*Platanus racemosa*). The vegetation community within the development boundary was dominated by arroyo willow, mule fat, and tarragon (*Artemisia dracunculus*). This habitat occurs in loose, sandy, or fine gravelly alluvium deposits near stream channels during flood flows. This habitat has potential to support sensitive plant and animal species and is considered sensitive by the County of San Diego.

Coast Live Oak Woodland & Dense Coast Live Oak Woodland (71160 & 71162)

Coast live oak is the dominant species in this woodland. The shrub tier is typically sparse as the only other shrub species observed onsite was toyon. The understory was dominated by non-native grasses and mustards. This community usually occurs along north-facing slopes and shaded ravines. Open coast live oak woodland is defined as having a canopy cover of less than 50%, and the coast live oak is often co-dominant with other woodland, riparian, or chaparral species. The open coast live oak woodland that occurred onsite contained California buckwheat, big sagebrush, and assorted non-native grasses. Dense coast live oak woodland (71162) is defined as having a canopy cover between 50 and 75% and considered more representative of riparian woodlands than coast live oak forests. This habitat has potential to support sensitive plant and animal species and is considered sensitive by the County of San Diego.

Non-Native Woodland (79000)

This woodland contains exotic trees, typically planted, which are not maintained or irrigated. Species found in this habitat include gum trees (*Eucalyptus* spp.) and salt cedar (*Tamarix* spp.) but may also include pepper trees (*Schinus* spp.) and other ornamentals. This habitat is not considered a sensitive habitat, and no habitat-based mitigation would be required. This habitat can support nesting birds, which are protected under state and federal laws.

Elderberry Savanna (63440)

This vegetation community is dominated by blue elderberry (*Sambucus nigra* ssp. *caerulea*) and sometimes includes other trees that contribute to a low percentage of the canopy cover, such as California walnut (*Juglans californica*), southern cottonwood, and coast live oak. The canopy can be open to continuous, and the herbaceous layer is variable and consists of mainly grasses. Within the development boundary, the understory consists of non-native grasses and scattered shrubs such

as California buckwheat, sticky monkeyflower (*Diplaucus aurantiacus*), and big basin sagebrush. This habitat is usually found on gravelly alluvium soils that intermittently flood in stream terraces and in bottomlands. This habitat is considered a riparian scrub. This habitat has potential to support sensitive plant and animal species and is considered sensitive by the County of San Diego.

Special Status Plants and Wildlife

Under CEQA, species are considered to be sensitive or have special status if they meet at least one of the following criteria:

- Species listed or proposed for listing as threatened or endangered under the Federal Endangered Species Act (FESA) (Code of Federal Regulations [CFR], Title 50, Section 17.12 [listed plants]); 50 CFR 17.11 (listed animals); and various notices in the *Federal Register* (FR) (proposed species).
- Species that are candidates for possible future listing as threatened or endangered under the FESA.
- Species listed or proposed for listing by the State of California as threatened or endangered under the California Endangered Species Act (CESA) (14 California Code of Regulations [CCR] 670.5).
- Plant species listed as rare under the California Native Plant Protection Act (NPPA; California Fish and Game Code [FGC] 1900 et seq.).
- Species that meet the definitions of “rare” or “endangered” under CEQA (State CEQA Guidelines Sections 15380 and 15125).
- Animal species of special concern to the CDFW.
- Animals that are “fully protected” in California (FGC Sections 3511 [birds], 4700 [mammals], 5050 [amphibians and reptiles], and 5515 [fish]).
- Species listed as having a California Rare Plant Rank (CRPR) of 1A (presumed extinct in California), 1B (rare, threatened, and endangered in California and elsewhere), or 2 (rare, threatened, or endangered in California, but more common elsewhere). CRPR List 1A, 1B, and 2 species are considered special-status plant species as defined in the NPPA, FGC Section 1901, the CESA FGC Sections 2050 through 2098, and CEQA Section 15380.
- Species considered CRPR 3 (plants for which more information is needed) or CRPR 4 (plants of limited distribution). Many CRPR List 3 and List 4 species may not meet the definitions of special status as defined in the NPPA, FGC Section 1901, or the CESA, FGC Sections 2050 through 2098, but are strongly recommended for consideration under CEQA.

The County identifies sensitive plant species as either List A, B, C or D. Plants categorized as County List A species are plants that are rare, threatened, or endangered in California and elsewhere. Plants categorized as County List B are rare, threatened or endangered in California, but more common elsewhere. County List C species are plants that may be rare, but more information is needed to determine their true rarity status. County List D species are of limited distribution and are uncommon, but not presently rare or endangered.

The County also identifies sensitive wildlife species as County Group 1 or 2. Group 1 species include those with a higher sensitivity and are listed as threatened or endangered or have a natural history requirement that increases their sensitivity. Group 2 species include those that are becoming less common, although are not so rare that extinction is imminent without immediate action.

Table 3 lists the special-status plant and wildlife species that were identified to have a high potential to occur within the development boundary.

Table 3. Special-Status Plant and Wildlife Species

Common Name	Scientific Name	Sensitivity Rankings	Habitat Associations – Potential to Occur in Onsite Communities
Plants			
Dean's milkvetch	<i>Astragalus deaneii</i>	CRPR 1B.1, List A	Forest, woodland, chaparrals, and big sagebrush scrub
Delicate clarkia	<i>Clarkia delicata</i>	CRPR 1B.2, List A	Oak woodland
Jacumba milkvetch	<i>Astragalus douglasii</i> var. <i>perstrictus</i>	CRPR 1B.2, List A	Forest, woodland, chaparrals, big sagebrush scrub, elderberry scrub, and non-native grassland
Southern jewelflower	<i>Streptanthus campestris</i>	CRPR 1B.3, List A	Rocky areas within chaparral
Southern mountains skullcap	<i>Scutellaria bolanderi</i> ssp. <i>austromontana</i>	CRPR 1B.2, List A	Chaparral and oak woodland
Sticky geraea	<i>Geraea viscida</i>	CRPR 2B.2, List B	Often occurs in disturbed areas in chaparral
Tecate tarplant	<i>Deinandra floribunda</i>	CRPR 1B.3, List A	Primarily drainages or other mesic areas within riparian areas or other habitats
Insects			
Quino checkerspot butterfly	<i>Euphydryas editha quino</i>	FE, List A	Openings in non-native grassland, big sagebrush scrub, elderberry scrub, chaparrals, and oak woodlands
Herpetofauna			
Baja California coachwhip	<i>Coluber fuliginosus</i>	SSC, Group 2	Uplands including chaparrals, big sagebrush scrub, and elderberry scrub
Coast horned lizard	<i>Phrynosoma blainvillii</i>	SSC, Group 2	Primarily feeds on native ants within non-native grassland, big sagebrush scrub, and openings in chaparrals
Cope's leopard lizard	<i>Gambelia copei</i>	SSC, Group 2	Chaparrals, big sagebrush scrub, and oak woodland
Orange-throated whiptail	<i>Aspidoscelis hyperythra</i>	CDFW WL, Group 2	Often utilizes riparian communities but can occur in

Common Name	Scientific Name	Sensitivity Rankings	Habitat Associations – Potential to Occur in Onsite Communities
			any community within the plan area
Two-striped garter snake	<i>Thamnophis hammondi</i>	SSC, Group 1	Riparian areas, wetlands, and waterways
Birds			
Barn owl	<i>Tyto alba</i>	Group 2	Nests in woodland and forests
Bell's sparrow	<i>Artemisiospiza belli</i>	CDFW WL, Group 1	Big sagebrush scrub, or openings in chaparrals
Cooper's hawk	<i>Accipiter cooperi</i>	CDFW WL, Group 1	Nests in forest and woodland communities; forages in woodland and grassland communities.
Golden eagle	<i>Aquila chrysaetos</i>	BaGE Protection Act, CDFW FP, Group 1	Potential to forage in the non-native grasslands
Great blue heron	<i>Ardea herodias</i>	Group 2	Communal nesting in trees including non-native woodlands; forages along streams and wetlands, or occasionally in grasslands
Least Bell's vireo	<i>Vireo bellii pusillus</i>	FE/SE, SSC, Group 1	Summer resident and nesting in riparian forest, southern willow scrub, and elderberry savanna
Mountain quail	<i>Oreortyx pictus eremophila</i>	Group 2	Potential to occupy all communities within the plan area
Prairie falcon	<i>Falco mexicanus</i>	CDFW WL, Group 1	Cliff nesting; forages in non-native grassland
Red-shouldered hawk	<i>Buteo lineatus</i>	Group 1	Nests in forest and woodland communities; forages in forest, woodland, and grassland communities
Tricolored blackbird	<i>Agelaius tricolor</i>	--/ST, SSC, Group 1	Communal nesting in large freshwater marshes; forages in agricultural areas including pasture and hay farms
Western bluebird	<i>Sialia mexicana</i>	Group 2	Nests in forest and woodland communities
White-tailed kite	<i>Elanus caeruleus</i>	CDFW FP, Group 1	Nests in woodland, forest, or chaparral communities; within the project area, would primarily forage over non-

Common Name	Scientific Name	Sensitivity Rankings	Habitat Associations – Potential to Occur in Onsite Communities
			native grasslands and big sagebrush scrub
Yellow warbler	<i>Dendroica petechia brewsteri</i>	SSC, Group 2	Summer resident and nesting in riparian forest
Mammals			
Dulzura pocket mouse	<i>Chaetodipus californicus femoralis</i>	SSC, Group 2	Resides in big sagebrush scrub, elderberry scrub, and chaparral
Mountain lion	<i>Felis concolor</i>	Group 2	Potential within all vegetation communities within the project area
San Diego black-tailed jackrabbit	<i>Lepus californicus bennettii</i>	SSC, Group 2	Preferentially occurs in open habitats including non-native grassland and elderberry scrub
Special Status: FE = Federally Endangered, ST = State Threatened, SSC = CDFW Species of Special Concern, WL= CDFW Watch List, CDFW FP = CDFW Fully-Protected, CRPR = California Rare Plant Ranking. Group 1 and 2 = County of San Diego Sensitive Animal List; List A-B = County of San Diego Sensitive Plant List; BaGE Protection Act = Bald and Golden Eagle Protection Act			

As listed above, the project area includes a variety of vegetation communities, sensitive species, and their associated habitat. Specific locations and types of disturbance associated with construction and operation of the project are unknown at this time. However, if ground-disturbing construction activities, noisy construction activities, or noisy operational activities are proposed in or within 100 feet of sensitive vegetation communities, mapped areas where sensitive species are present, or mapped habitat locations, the sensitive plant and wildlife species and communities may be disturbed directly or indirectly. Direct or indirect disturbance could result in a substantial adverse effect on special status species. The following mitigation measures required for all future discretionary actions were identified by, or consistent with, the following GPU mitigation measures: Bio-1.5, Bio-1.6, Bio-2.2, and Bio-2.3.

Project Mitigation

The following includes the Project Mitigation Measure:

- Biological Resources Review:** Prior to approval of any discretionary project, a biological resources review consistent with the County of San Diego Guidelines for Determining Significant for Biological Resources, the County Report Format and Content Requirements for Biological Resources, Resource Protection Ordinance and other County regulations, shall be conducted. The level of analysis required shall be determined by the County Staff Biologist. Specific mitigation measures and conditions, if required, that are consistent with the GPU EIR mitigation measures, shall be applied to the project.
- Jurisdictional Delineations:** Prior to approval of any project that may impact a State or Federal Jurisdictional Water/Wetland or County Resource Protection Ordinance Wetland, the project proponent must present the proposed

disturbance plan to the County staff biologist for review. The project proponent shall comply with the recommendations from the County staff biologist, which could include, but are not limited to, the following:

- Conduct a jurisdictional determination
- If the jurisdictional determination confirms there are no wetlands present within the disturbance area, no further action is required.
- If the jurisdictional determination identifies state or federally listed waters/wetlands that will be impacted by the future project, the following shall be conducted:
 - Obtain a Clean Water Act Section 401/404 permit issued by the California Regional Water Quality Control Board (RWQCB) and U.S. Army Corps of Engineers (USACE) for any impacts on waters of the State, waters of the U.S., or jurisdictional wetlands.
 - Obtain a California Fish and Game Code Section 1602 Streambed Alteration Agreement issued by CDFW for any impacts on CDFW-jurisdictional streambeds or associated fish and wildlife habitat.
- Conform to the County RPO. Areas meeting the wetland definition in the RPO shall be avoided and have a minimum 50-foot avoidance buffer implemented, except for road or driveway crossings, or as otherwise exempted by provisions in San Diego County Code Section 86.605. Road crossings shall comply with San Diego County Code Section 86.604 (a)(5), which states that crossings are only allowed when there is no feasible alternative, crossings are limited to the minimum number, are located in the least environmentally damaging location and constructed with least damaging means, and if the crossing could serve adjoining properties. If crossing meets the requirements of the RPO and is allowable by PDS, any impacts on wetlands shall be mitigated at a minimum ratio of 3:1, with a minimum 1:1 creation component.
- **Purchase or Preserve Big Sagebrush Scrub Habitat.** Mitigation for impacts on big sagebrush scrub shall occur at a 2:1 ratio and follow County requirements, such as stipulated in the Report Format and Content Requirements (2010). Mitigation shall occur “in-kind” unless a biologically based determination can be made to substitute habitat with similar functions and values to that which was impacted.
- **Quino Checkerspot Butterfly Surveys.** Future projects would be required to conduct project-specific Quino checkerspot butterfly surveys during project scoping, in compliance with the County of San Diego Guidelines for Determining Significance – Biological Resources (2010), Report Format and Content Requirements (2010), Resource Protection Ordinance, and other County regulations. The project proponent must present the proposed disturbance plan to the County staff biologist, who shall confirm the extent of the surveys. The project proponent shall comply with the recommendations from the County staff biologist, which could include, but are not limited to, the following:

- If proposed disturbance is located within big sagebrush scrub, granitic northern mixed chaparral, chamise chaparral, or non-native grassland habitats, conduct surveys for the Quino checkerspot butterfly consistent with current USFWS guidance. As of 2014, this consists of weekly surveys of suitable “non-excludable” habitat from the third week of February through the second Saturday in May.
- If Quino checkerspot butterfly are not identified, no further action is required.
- If Quino checkerspot butterfly is identified, conduct additional biological analysis and permitting through the USFWS.
- Include the results of this survey within the biological technical report
- **Purchase or Preserve Granitic Northern Mixed Chaparral Habitat.** Mitigation for impacts on granitic northern mixed chaparral shall occur at a 0.5:1 ratio and follow County requirements, such as stipulated in the Report Format and Content Requirements (2010). Mitigation shall occur “in-kind” unless a biologically based determination can be made to substitute habitat with similar functions and values to that which was impacted.
- **Purchase or Preserve Chamise Chaparral Habitat.** Mitigation for impacts on chamise chaparral (including chamise chaparral – disturbed) shall occur at a 0.5:1 ratio and follow County requirements, such as stipulated in the Report Format and Content Requirements (2010). Mitigation shall occur “in-kind” unless a biologically based determination can be made to substitute habitat with similar functions and values to that which was impacted.
- **Purchase or Preserve Non-Native Grassland Habitat.** Mitigation for impacts on non-native grassland shall occur at a 0.5:1 ratio and follow County requirements, such as stipulated in the Report Format and Content Requirements (2010). Mitigation shall occur “in-kind” unless a biologically based determination can be made to substitute habitat with similar functions and values to that which was impacted.
- **Purchase or Preserve Southern Coast Live Oak Riparian Forest Habitat.** Mitigation for impacts on southern coast live oak riparian forest shall occur at a 3:1 ratio and follow County requirements, such as stipulated in the Report Format and Content Requirements (2010). Mitigation shall occur “in-kind” unless a biologically based determination can be made to substitute habitat with similar functions and values to that which was impacted.
- **Purchase or Preserve Southern Cottonwood-Willow Riparian Forest-Disturbed Habitat.** Mitigation for impacts on southern cottonwood-willow riparian forest-disturbed shall occur at a 3:1 ratio and follow County requirements, such as stipulated in the Report Format and Content Requirements (2010). Mitigation shall occur “in-kind” unless a biologically based determination can be made to substitute habitat with similar functions and values to that which was impacted.
- **Purchase or Preserve Southern Willow Scrub-Disturbed Habitat.** Mitigation for impacts on southern willow scrub-disturbed shall occur at a 3:1

ratio and follow County requirements, such as stipulated in the Report Format and Content Requirements (2010). Mitigation shall occur “in-kind” unless a biologically based determination can be made to substitute habitat with similar functions and values to that which was impacted.

- **Purchase or Preserve Coast Live Oak Habitat.** Mitigation for impacts on coast live oak shall occur at a 3:1 ratio and follow County requirements, such as stipulated in the Report Format and Content Requirements (2010). Mitigation shall occur “in-kind” unless a biologically based determination can be made to substitute habitat with similar functions and values to that which was impacted.
- **Establish Oak Root Protection Zones.** For development proposed within 100-feet of oak trees, oak root protection zones shall be established following the details in the County Report Format and Content Requirements (County 2010a), including that development plans shall include a minimum 50-foot oak root protection zone between the dripline of the oak trees and the nearest ground disturbance (i.e., grading or trenching). Oak woodlands and oak root protection zones shall be included in a biological open space easement or impacts must be addressed. Impacts from ground disturbance and compaction in the oak root protection zone will result in proportional impacts on the oak woodland and would be mitigated according to **Purchase and Preserve Coast Live Oak Habitat**.
- **Purchase or Preserve Elderberry Scrub Habitat.** Mitigation for impacts on elderberry scrub shall occur at a 3:1 ratio and follow County requirements, such as stipulated in the Report Format and Content Requirements (2010). Mitigation shall occur “in-kind” unless a biologically based determination can be made to substitute habitat with similar functions and values to that which was impacted.

The mitigation measures provided above would be applied on a project-specific basis as future discretionary projects are applied for. In addition, this list is not an exhaustive list of all mitigation measures that may be required on future discretionary projects. As described below, impacts on vegetation communities would be reduced with the incorporation of project mitigation measures. Table 4 lists the vegetation communities that were observed within the project area during the field survey and identifies applicable mitigation measures.

Table 4. Impacts by Vegetation Community and Mitigation

Vegetation Community	Impact	Applicable Mitigation Measure(s)
Disturbed Wetland	Construction and operational activities have the potential to disturb or destroy this vegetation community	Biological Resources Review, Jurisdictional Delineations
	Construction and operational activities have the potential to disrupt the nesting success of riparian birds	Biological Resources Review
	Construction in wetlands could conflict with local ordinances	Biological Resources Review, Jurisdiction Delineations
Disturbed Habitat	None – not sensitive	None; compliance with regulations
Urban/Developed	None – not sensitive	None; compliance with regulations
Big Sagebrush Scrub	Construction and operational activities have the potential to disturb or destroy this vegetation community	Biological Resource Review, Purchase or Preserve Big Sagebrush Scrub
	Construction and operational activities have the potential to disrupt the nesting success of birds	Biological Resources Review
	Construction and operational activities have the potential to disturb Quino checkerspot butterfly or damage their habitat	Biological Resources Review, Quino Checkerspot Butterfly Surveys
Granitic Northern Mixed Chaparral	Construction and operational activities have the potential to disturb or destroy this vegetation community	Biological Resources Review, Purchase or Preserve Granitic Northern Mixed Chaparral
	Construction and operational activities have the potential to disrupt the nesting success of birds	Biological Resources Review
	Construction and operational activities have the potential to disturb Quino checkerspot butterfly or damage their habitat	Biological Resources Review, Quino Checkerspot Butterfly Surveys
Chamise Chaparral	Construction and operational activities have the potential to disturb or destroy this vegetation community	Biological Resources Review, Purchase or Preserve Chamise Chaparral
	Construction and operational activities have the potential to disrupt the nesting success of birds	Biological Resources Review
	Construction and operational activities have the potential to disturb Quino	Biological Resources Review, Quino

Vegetation Community	Impact	Applicable Mitigation Measure(s)
	checkerspot butterfly or damage their habitat	Checkerspot Butterfly Surveys
Non-Native Grassland	Construction and operational activities have the potential to disturb or destroy this vegetation community	Biological Resources Review, Purchase or Preserve Non-Native Grassland
	Construction and operational activities have the potential to disrupt the nesting success of birds	Biological Resources Review
	Construction and operational activities have the potential to disturb Quino checkerspot butterfly or damage their habitat	Biological Resources Review, Quino Checkerspot Butterfly Surveys
Southern Coast Live Oak Riparian Forest	Construction and operational activities have the potential to disturb or destroy this vegetation community	Biological Resources Review, Purchase or Preserve Southern Coast Live Oak Riparian Forest
	Construction and operational activities have the potential to disrupt the nesting success of birds	Biological Resources Review
Southern Cottonwood-Willow Riparian Forest – Disturbed	Construction and operational activities have the potential to disturb or destroy this vegetation community	Biological Resources Review, Purchase Southern Cottonwood-Willow Riparian Forest - Disturbed
	Construction and operational activities have the potential to disrupt the nesting success of birds	Biological Resources Review
Southern Willow Scrub – Disturbed	Construction and operational activities have the potential to disturb or destroy this vegetation community	Biological Resources Review, Purchase or Preserve Southern Willow Scrub - Disturbed
	Construction and operational activities have the potential to disrupt the nesting success of birds	Biological Resources Review
Coast Live Oak Woodland	Construction and operational activities have the potential to disturb or destroy this vegetation community	Biological Resources review, Purchase or Preserve Coast Live Oak Woodland
	Construction and operational activities have the potential to impact the shallow root systems of oaks	Biological Resources review, Establish Oak Root Protection Zone

Vegetation Community	Impact	Applicable Mitigation Measure(s)
	Construction and operational activities have the potential to disrupt the nesting success of birds	Biological Resources Review
Non-Native Woodland	Construction and operational activities have the potential to disrupt the nesting success of birds	Biological Resources Review
Elderberry Savanna	Construction and operational activities have the potential to disturb or destroy this vegetation community	Biological Resources Review, Purchase or Preserve Elderberry Savanna
	Construction and operational activities have the potential to disrupt the nesting success of birds	Biological Resources Review

Impacts on sensitive species and their habitat would be reduced to less than significant with the incorporation of the above mitigation measures.

As previously discussed, the GPU EIR determined impacts to special status species as significant and unavoidable. However, the Project determined impacts to be less than significant with the incorporation of project mitigation measures identified by, or consistent with, the GPU EIR mitigation measures Bio-1.5, Bio-1.6, Bio-2.2, and Bio-2.3. Therefore, the Project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 4(b) The GPU EIR concluded this impact to be significant and unavoidable. Specific locations and types of disturbance associated with construction and operation of the project are unknown at this time. If ground-disturbing construction activities or noisy construction or operational activities are proposed in or within 100 feet of riparian habitat or other sensitive natural communities, potentially significant impacts may occur due to the disturbance of sensitive plant and wildlife species and communities. However, future discretionary projects would be required to comply with the mitigation measures identified in Biological Resources 4(a) on a project-basis pursuant to County staff review. Therefore, no impacts would occur to riparian habitat or other sensitive natural community.

As previously discussed, the GPU EIR determined impacts to riparian habitat and other sensitive natural communities as significant and unavoidable. However, the proposed Project's impacts would be less than significant with the implementation of Project mitigation measures consistent with GPU EIR mitigation measures Bio-1.5, Bio-1.6, Bio-2.2 and Bio-2.3. Therefore, the Project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 4(c) The GPU EIR concluded this impact to be less than significant with mitigation. During habitat assessments conducted in May 2018, areas that are likely wetlands or waterways protected by federal, state, or local laws and regulations were identified and mapped on Biological Resources Figures 1a through 1i. These areas are located

sporadically throughout the project site. However, future discretionary projects would be required to comply with mitigation measures, such as Biological Resources Review and Jurisdictional Delineations listed in Biological Resources 4(a). These measures were identified by GPU EIR mitigation measures Bio-1.5, Bio-1.6, Bio-2.2, and Bio-2.3. Therefore, no impacts to federally protected wetlands would occur

As previously discussed, the GPU EIR determined impacts to federally protected wetlands as significant with mitigation. However, the proposed Project determined impacts would be less than significant with mitigation measures identified by the GPU EIR mitigation measures as Bio 1.5, Bio-1.6, Bio-2.2 and Bio 2.3. Therefore, the Project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 4(d) The GPU EIR concluded this impact to be significant and unavoidable. The project is located within the draft East County Multiple Species Conservation Plan (MSCP) planning area. The draft East County MSCP plan has not been adopted, and therefore, no core habitat areas or priority linkages have been delineated. However, the project site and surrounding area does not support ridges or valleys that could direct and concentrate wildlife movement. Riparian corridors are also frequently used for wildlife habitat and movement. Campo Creek to the north of project area may be used by birds and medium-to-large mammals for movement; however, the project does not propose development near Campo Creek. No other unique geological or biological features were observed that would concentrate usage of animals for nursery sites. In addition, all future discretionary actions would be required to comply with project mitigation measures listed under Biological Resources 4(a) as well as the Migratory Bird Treaty Act of the US Fish and Wildlife Service. Therefore, the project would not interfere substantially with the movement of any native resident or migratory fish or wildlife species, wildlife corridors, or wildlife nursery sites.

As previously discussed, the GPU EIR determined impacts to wildlife movement corridors as significant and unavoidable. However, the Project impacts were determined to be less than significant for the reasons detailed above. Therefore, the Project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 4(e) The GPU EIR concluded this impact to be less than significant. As previously stated in Biological Resources 4(d), the project site is located within the draft East County MSCP planning area. Implementation of the project would not prevent the adoption of the East County MSCP. The project is clustered around existing development and, as discussed above, any impacts on sensitive natural vegetation communities would be mitigated following the ratios in the County Guidelines for Determining Significance, which are at least as restrictive, or more restrictive than, mitigation ratios expected to be developed in the East County MSCP.

The project site does not contain coastal sage scrub habitat, and therefore projects within are not subject to the Habitat Loss Permit Ordinance. The Master Plan and Overlay Zone is outside of the existing San Diego MSCP and, therefore, projects within the zone are not subject to the County Biological Mitigation Ordinance. All future discretionary projects would be required to comply with the County Resource Protection Ordinance, including steep slope lands and RPO wetlands. Therefore, for

the reasons detailed above, the project would not conflict with the provisions of approved local, regional, or state habitat conservations plans and other policies and ordinances to protect biological resources.

As previously discussed, the GPU EIR determined impacts on local policies and ordinances as well as habitat conservation plans and natural community conservation plans as less than significant. As the proposed Project would have a less-than-significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

Conclusion

With regards to the issue area of Biological Resources, the following findings can be made:

1. No peculiar impacts to the Project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. Feasible mitigation measures contained within the GPU EIR (Bio 1.5, Bio-1.6, Bio-2.2 and Bio 2.3) would be applied to the Project. Those mitigation measures, as detailed above, requires further biological resources review and the Project applicant to comply with the County's Guidelines for Determining Significance for Biological Resources, the County RPO, to obtain permits through the RWQCB and USACE (if necessary), and ensure that wetlands and wetland buffer areas are adequately preserved.

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
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5. Cultural Resources – Would the Project:

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

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to 15064.5?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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c) Directly or indirectly destroy a unique geologic feature?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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d) Directly or indirectly destroy a unique paleontological resource or site?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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e) Disturb any human remains, including those interred outside of formal cemeteries?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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A *Cultural Technical Report* and a *Cultural Landscape Technical Report* were prepared for the project by ICF, July 2020 and December 2019, respectively. Since these studies were prepared, the project description has slightly changed to remove previously proposed residential components within the SYH planning area. The removed residential uses include the following: Senior and Veteran Housing Area; Affordable Housing (duplex, triplex); Veteran Legacy Village; and Mixed Use Residential. Because these use types were removed, the analysis provided within these studies is considered conservative.

Discussion

5(a) The GPU EIR concluded this impact to be less than significant with mitigation. The project area overlaps with a known historical resource. The Camp Lockett Rural Historic Landscape District was listed on the San Diego County Local Register of Historic Places (Local Register) on October 25, 2003. The property was further documented for a National Register of Historic Places (NRHP) application in 2006, but the nomination was not approved by the State Historic Preservation Officer (SHPO). A 122-acre portion of the Master Plan area was also designated as CHL Number 1045 on October 30, 2009.

In 2019, the County of San Diego Department of Planning & Development Services (PDS) retained ICF to perform an updated field survey and research effort of Camp Lockett in order to fill in gaps in the earlier investigations in the vicinity of the Historic District. As a result of this analysis, two technical reports were produced: the *Cultural Resources Technical Report for the Camp Lockett Master Plan and Overlay Zone* and the *Camp Lockett Cultural Landscape Technical Report*.

The *Cultural Resources Technical Report* largely focused on updating the National Register Nomination to reflect current site conditions but retained the district boundary and period of significance as they were outlined in previous documentation. The *Cultural Landscape Technical Report* identified a Cultural Landscape Area boundary that extended beyond and was inclusive of the Historic District boundary and included both buildings and landscape features associated with the development of Camp Lockett. The *Cultural Landscape Technical Report* retained the previously determined

period of significance of 1941 to 1946. Examples of the types of landscape features that were identified in the *Cultural Landscape Technical Report* include historic-era land patterns, land use, roads, drainage, and signage.

The *Cultural Resources Technical Report* and the *Cultural Landscape Technical Report* evaluated different aspects of the resource and included different boundaries and lists of contributing features. Both reports considered together represent a holistic and complete inventory of contributing elements of the historical resource known as Camp Lockett and are used in combination to define the historical resource in this impact analysis. The Historic District and Cultural Landscape boundaries and the Master Plan and Overlay Zone are illustrated in the Master Plan Figure 6.

The project site will be rezoned with a Historic Special Area Designator (H) which will require that all proposed development be subject to the County Zoning Ordinance Section 5700, Historic/Archaeological Landmark and District Area Regulations. This requirement was identified in the GPU EIR mitigation measure Cul-1.3. Future development projects would require a discretionary site plan approval and review of cultural resources pursuant to CEQA, unless a Site Plan exemption is granted per Zoning Ordinance Section 5700. If the County finds that a future project does not comply with the Guidelines for Determining Significance for Cultural Resources or other local, state or federal regulation, the project proponent shall consult with County staff and interested parties to determine whether there are feasible means to redesign the project to avoid significant impacts.

Because current proposed activities within the approximately 194-acre development area call for improvements that may require ground disturbance, vegetation clearing, alterations of existing roads and buildings, new construction, and demolition of infrastructure, utilities, and buildings that contribute to the Camp Lockett Historic Landscape District and the Camp Lockett Cultural Landscape, these proposed activities, among others, could result in significant impacts on historical resources. Therefore, the following mitigation measures would be applied to all future discretionary actions and has been identified as GPU EIR mitigation measure Cul-1.1.

Project Mitigation

The following includes the project mitigation measure:

- **Conduct a Project Assessment.** The County will conduct an initial assessment for future proposed projects associated with implementation of the project to determine if the project complies with Zoning Ordinance Section 5700, "H" Special Area designator. If the County determines that project activities are not consistent with the Guidelines for Determining Significance for Cultural Resources or other requirements, the project proponent would be required to prepare a Project Assessment to assess the potential project-specific impacts on the district and cultural landscape as part of a future discretionary action.

Aspects of the project have the potential to impact historical resources. Implementation of the "H" Special Area designator and project mitigation would ensure that no impacts would occur to Historic Resources.

As previously discussed, the GPU EIR determined impacts on historic resources to be less than significant with mitigation. The project would also result in a less than significant impact with mitigation with the incorporation of the “H” Special Area Designator, as identified by the GPU EIR as Cul-1.3, and the Project Assessment, identified as GPU EIR mitigation measure CUL-1.1. Therefore, the Project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 5(b) The GPU EIR concluded this impact to be less than significant with mitigation. The project site was surveyed by County-approved archaeologist Patrick McGinnis, M.A., RPA, in November 2018. Mr. McGinnis determined that there are 63 archaeological resources present on the project site. These resources include 11 prehistoric archaeological resources and 52 historic-period archaeological resources.

The eleven prehistoric archaeological resources include five bedrock milling sites, one large habitation site, and five prehistoric isolate artifacts. The historic-period archaeological sites include landscaping such as retaining walls, stairs, rock-lined pathways, and monuments; recreational elements such as ball fields and ballcourts; and infrastructure elements such as sewer/septic lines, manhole covers, aboveground barbecue pits, and drinking fountains. A large number of concrete foundations and wall remnants were also recorded. Most of the historic period archaeological resources date to the Camp Lockett period (1941–1946); however, some date to the early period of Juvenile Ranch Facility (JRF) use from the late 1960s to the early 1970s. Table 5 lists all 63 archaeological resources identified within the project area and their potential significance.

Table 5. Archaeological Resources Identified in the Project Area

Resource #	Description	Historic or Prehistoric	Relocated or Newly Identified	Eligibility Status
P-37-000083/ CA-SDI-00083	Pottery and BRM	Prehistoric	Relocated – mis-mapped and only bedrock milling was identified.	Not evaluated for listing in CRHR or NRHP
ICF-CL-P-01	Two grinding surfaces on granitic bedrock (2 slicks)	Prehistoric	Previously unrecorded	Not evaluated for listing in CRHR or NRHP
ICF-CL-P-02	Two grinding surfaces on two nearby granitic bedrock outcrops	Prehistoric	Previously unrecorded	Not evaluated for listing in CRHR or NRHP
ICF-CL-P-03	Large habitation site with possible burned mammal remains, pottery sherds, lithic flakes, bedrock milling	Prehistoric	Previously unrecorded	Not evaluated for listing in CRHR or NRHP but appears to be a potentially significant resource
ICF-CL-P-04	Three grinding surfaces on a large, disturbed granitic bedrock outcrop	Prehistoric	Previously unrecorded	Not evaluated for listing in CRHR or NRHP

Resource #	Description	Historic or Prehistoric	Relocated or Newly Identified	Eligibility Status
P-37-025226/ CA-SDI-16718	Camp Lockett: foundations and pilings for men's dormitories	Historic	Relocated – concrete pilings and stairs	Appears eligible for listing as a contributor to a district through survey evaluation
P-37-025228/ CA-SDI-16720	Camp Lockett: foundation for the chapel and hospital-era lab	Historic	Relocated – concrete piers	Appears eligible for listing as a contributor to a district through survey evaluation
P-37-025232/ CA-SDI-16724	Camp Lockett: foundation for the latrines and officers' quarters	Historic	Relocated – foundation and stem wall	Appears eligible for listing as a contributor to a district through survey evaluation
P-37-025233/ CA-SDI-16725	Camp Lockett: foundation for the administration building, latrine, fishpond, and other buildings	Historic	Relocated – concrete foundation and walls	Appears eligible for listing as a contributor to a district through survey evaluation
P-37-025235/ CA-SDI-16727	Camp Lockett: foundation for the Troop A Day Room and two barracks building; the Troop A Mess Hall and Storeroom are standing and were included in the site form	Historic	Relocated – concrete foundations	Appears eligible for listing as a contributor to a district through survey evaluation
P-37-025236/ CA-SDI-16728	Troop B Day Room (T-323) Foundations	Historic	Relocated – concrete foundation and footings	Appears eligible for listing as a contributor to a district through survey evaluation
P-37-025237/ CA-SDI-16729	Camp Lockett: foundation for the Troop C Day Room and Troop C Supply House foundations and existing/ standing Mess Hall	Historic	Relocated – concrete foundation slabs and footings	Appears eligible for listing as a contributor to a district through survey evaluation
P-37-025238/ CA-SDI-16730	Camp Lockett: foundation for Troop F Storeroom and Day Room	Historic	Relocated – concrete foundation and footings	Appears eligible for listing as a contributor to a district through survey evaluation
P-37-025247/ CA-SDI-16739	Camp Lockett: 10 th Calvary Motor Pool buildings foundation slabs	Historic	Relocated – concrete foundations in poor condition	Appears eligible for listing as a contributor to a district through survey evaluation
P-37-025241/	Cell block foundations and latrine	Historic	Relocated – concrete foundations for	Appears eligible for listing as a contributor

Resource #	Description	Historic or Prehistoric	Relocated or Newly Identified	Eligibility Status
CA-SDI-16733			latrine and piers for stockade	to a district through survey evaluation
P-37-025251/ CA-SDI-16743	Camp Lockett: structural remains of the barracks, company administration, supply house, latrine, and mess hall	Historic	Relocated – concrete piers	Appears eligible for listing as a contributor to a district through survey evaluation
P-37-025264/ CA-SDI-16756	Camp Lockett: foundations of four quartermaster warehouses	Historic	Relocated – mostly destroyed, some still in place; concrete debris around area	Appears eligible for listing as a contributor to a district through survey evaluation
P-37-025270/ CA-SDI-16762	Pioneer cemetery – no headstones or burial records	Historic	Relocated – cemetery still there	Appears eligible for listing as a contributor to a district through survey evaluation
P-37-025272/ CA-SDI-16764	Camp Lockett: structural remains of dog kennel, rockwork, and board construction	Historic	Relocated – stairs, rock masonry walls, concrete foundation	Appears eligible for listing as a contributor to a district through survey evaluation
P-37-025273/ CA-SDI-16765	Camp Lockett: structural remains of a latrine within Mitchell Convalescent Hospital	Historic	Relocated – concrete pad with interior walls	Appears eligible for listing as a contributor to a district through survey evaluation
P-37-025275/ CA-SDI-16767	Camp Lockett: Structural remains veterinary ward and corral Lockett Building #92	Historic	Relocated – concrete pad	Appears eligible for listing as a contributor to a district through survey evaluation
P-37-025279/ CA-SDI-16771	Camp Lockett: structural remains of veterinary ward and corral	Historic	Relocated – concrete pad and remains	Appears eligible for listing as a contributor to a district through survey evaluation
ICF-CL-H-01	Very dispersed historic and modern trash scatter	Historic	Previously unrecorded	Not evaluated for listing in CRHR or NRHP
ICF-CL-H-02	Abandoned concrete manhole with historic artifacts	Historic	Previously unrecorded	Not evaluated for listing in CRHR or NRHP
ICF-CL-H-03	Concrete pad	Historic	Previously unrecorded	Not evaluated for listing in CRHR or NRHP

Resource #	Description	Historic or Prehistoric	Relocated or Newly Identified	Eligibility Status
ICF-CL-H-08	Possible septic cover dated 5/21/21	Historic	Previously unrecorded	Not evaluated for listing in CRHR or NRHP
ICF-CL-H-04	Concrete stairway leading from track field to baseball field	Historic	Previously unrecorded	Not evaluated for listing in CRHR or NRHP
ICF-CL-H-05	Concrete athletic courts	Historic	Previously unrecorded	Not evaluated for listing in CRHR or NRHP
ICF-CL-H-06	Two concrete retaining/landscaping walls and one concrete masonry unit wall	Historic	Previously unrecorded	Not evaluated for listing in CRHR or NRHP
P-37-25820 ICF-CL-H-10	Concrete pad with aprons; remains of stable buildings T-607, T-608, T-609 and other buildings	Historic	Partially recorded	Appears eligible for listing as a contributor to a district through survey evaluation
ICF-CL-H-11	Concrete walls, stairs, and a pathway leading to swimming pool area	Historic	Previously unrecorded	Not evaluated for listing in CRHR or NRHP
ICF-CL-H-12	Monument with red white blue rocks	Historic	Previously unrecorded	Appears eligible for listing as a contributor to a district through survey evaluation
ICF-CL-H-16	Two concrete pads and three ornamental planters	Historic	Previously unrecorded	Appears eligible for listing as a contributor to a district through survey evaluation
ICF-CL-H-17	Low concrete and fieldstone wall	Historic	Previously unrecorded	Appears eligible for listing as a contributor to a district through survey evaluation
ICF-CL-H-18	Concrete flagpole base, JRF period	Historic	Previously unrecorded	Not evaluated for listing in CRHR or NRHP
ICF-CL-H-19	Water fountain, JRF period	Historic	Previously unrecorded	Not evaluated for listing in CRHR or NRHP
ICF-CL-H-22	Low rock and concrete, JRF period	Historic	Previously unrecorded	Not evaluated for listing in CRHR or NRHP
ICF-CL-H-25	Possible cattle trough	Historic	Previously unrecorded	Not evaluated for listing in CRHR or NRHP

Resource #	Description	Historic or Prehistoric	Relocated or Newly Identified	Eligibility Status
ICF-CL-H-26	BBQ from 1970s, JRF period	Historic	Previously unrecorded	Not evaluated for listing in CRHR or NRHP
ICF-CL-H-28	Concrete manhole, wheelbarrow, and historic debris. Located on site of T-308, which was not relocated	Historic	Previously unrecorded	Not evaluated for listing in CRHR or NRHP
ICF-CL-H-29	Concrete manhole with cover	Historic	Previously unrecorded	Not evaluated for listing in CRHR or NRHP
ICF-CL-H-32	BBQ grill and bench, JRF period	Historic	Previously unrecorded	Not evaluated for listing in CRHR or NRHP
ICF-CL-ISO-01	Dense, grey, metavolcanic flake tool	Prehistoric	Previously unrecorded	Isolate, not recommended eligible for listing in CRHR or NRHP
ICF-CL-ISO-02	Black porphyritic flake	Prehistoric	Previously unrecorded	Isolate, not recommended eligible for listing in CRHR or NRHP
ICF-CL-ISO-03	1 Metavolcanic flake green and 1 metavolcanic flake (grey)	Prehistoric	Previously unrecorded	Isolate, not recommended eligible for listing in CRHR or NRHP
ICF-CL-ISO-04	Prehistoric pottery sherd (small, Tizon brown)	Prehistoric	Previously unrecorded	Isolate, not recommended eligible for listing in CRHR or NRHP
ICF-CL-ISO-05	Two porphyritic black flakes with cortex	Prehistoric	Previously unrecorded	Isolate, not recommended eligible for listing in CRHR or NRHP
ICF-CL-ISO-06	CCS tool with step fractures	Prehistoric	Previously unrecorded	Isolate, not recommended eligible for listing in CRHR or NRHP
ICF-CL-ISO-07	10 cent store token	Historic	Previously unrecorded	Isolate, not recommended eligible for listing in CRHR or NRHP
T-308	Troop E Barracks site	Historic	Not relocated, no foundations identified	Recommended not eligible

Resource #	Description	Historic or Prehistoric	Relocated or Newly Identified	Eligibility Status
T-328	Troop F Barracks	Historic	Not relocated, no foundations identified	Recommended not eligible
T-302	First Squadron Headquarters Barracks	Historic	Not relocated, no foundations identified	Recommended not eligible
T-310	Troop E Barracks	Historic	Not relocated, no foundations identified	Recommended not eligible
T-312	Second Squadron Headquarters Barracks	Historic	Not relocated, no foundations identified	Recommended not eligible
T-324	Troop B Barracks	Historic	Not relocated, no foundations identified	Recommended not eligible
T-330	Troop F Barracks	Historic	Not relocated, no foundations identified	Recommended not eligible
T-311	Troop E Mess Hall	Historic	Not relocated, no foundations identified	Recommended not eligible
T-329	Troop F Mess Hall	Historic	Not relocated, no foundations identified	Recommended not eligible
T-333	Troop E Store House	Historic	Not relocated, no foundations identified	Recommended not eligible
T-322	Troop B Barracks	Historic	Not relocated, no foundations identified; basketball court on site but does not match orientation of building pad	Recommended not eligible
T-232	Officer's Quarters	Historic	Not relocated, no foundations identified	Recommended not eligible
T-234	Officer's Quarters	Historic	Not relocated, no foundations identified	Recommended not eligible
T-307	Troop E Store House	Historic	Not relocated, no foundations identified	Recommended not eligible
Note: Gray shading denotes listed in the 2006 or 2009 Nomination Form.				

An archaeological technical study entitled, *Draft Cultural Resources Technical Report for the Camp Lockett Master Plan Overlay Zone, San Diego, California*, prepared by ICF, dated August 2019 evaluated the significance of the archaeological resources based on survey data, analysis of recovered artifacts, and other investigations. Pursuant to the State CEQA Guidelines Section 15064.5, significant archaeological resources were found on the site. Table 5 lists all 63 archaeological resources identified within the project area and their potential significance. Impacts on the significant resources, and any unevaluated resources, can be reduced with the implementation of specific mitigation measures identified by the GPU EIR as mitigation measure Cul-2.5.

As considered by the GPU EIR, potential impact to cultural resources will be mitigated through ordinance compliance and through implementation of the following mitigation measures: grading monitoring under the supervision of a County-approved archaeologist and a Native American Observer (if required, to be determined by County Staff Culturalist) and conformance with the County's Cultural Resource Guidelines if resources are encountered. The GPU EIR identified these mitigation measures as Cul-2.5. All future discretionary actions would be conditioned with archaeological monitoring that includes the following requirements:

Project Mitigation

The following includes the project mitigation measure:

- **Archaeological Monitoring Program:**
 - Pre-construction
 - Pre-construction meeting to be attended by the Project Archaeologist and Native American monitor(s) to explain the monitoring requirements.
 - Construction
 - Monitoring. Both the Project Archaeologist and Native American monitor(s) are to be onsite during earth disturbing activities. The frequency and location of monitoring of native soils will be determined by the Project Archaeologist in consultation with the Native American monitor(s). Monitoring of previously disturbed soils will be determined by the Project Archaeologist in consultation with the Native American monitor(s).
 - If cultural resources are identified:
 - Both the Project Archaeologist and Native American monitor(s) have the authority to divert or temporarily halt ground disturbance operations in the area of the discovery.
 - The Project Archaeologist shall contact the County Archaeologist.
 - The Project Archaeologist in consultation with the County Archaeologist and Native American monitor(s) shall determine the significance of discovered resources.
 - Construction activities will be allowed to resume after the County Archaeologist has concurred with the significance evaluation.
 - Isolates and non-significant deposits shall be minimally documented in the field. Should the isolates and non-significant deposits not be collected by the Project Archaeologist, the Native American monitor(s) may collect the

- cultural material for transfer to a Tribal curation facility or repatriation program.
- If cultural resources are determined to be significant, a Research Design and Data Recovery Program shall be prepared by the Project Archaeologist in consultation with the Native American monitor(s) and approved by the County Archaeologist. The program shall include reasonable efforts to preserve (avoid) unique cultural resources of Sacred Sites; the capping of identified Sacred Sites or unique cultural resources and placement of development over the cap if avoidance is infeasible; and data recovery for non-unique cultural resources. The preferred option is preservation (avoidance).
- Human Remains.
 - The Property Owner or their representative shall contact the County Coroner and the PDS Staff Archaeologist.
 - Upon identification of human remains, no further disturbance shall occur in the area of the find until the County Coroner has made the necessary findings as to origin. If the human remains are to be taken offsite for evaluation, they shall be accompanied by the Native American monitor(s).
 - If the remains are determined to be of Native American origin, the Most Likely Descendant (MLD), as identified by the Native American Heritage Commission (NAHC), shall be contacted by the Property Owner or their representative in order to determine proper treatment and disposition of the remains.
 - The immediate vicinity where the Native American human remains are located is not to be damaged or disturbed by further development activity until consultation with the MLD regarding their recommendations as required by Public Resources Code Section 5097.98 has been conducted.
 - Public Resources Code §5097.98, CEQA §15064.5 and Health & Safety Code §7050.5 shall be followed in the event that human remains are discovered.
- Rough Grading
 - Upon completion of Rough Grading, a monitoring report shall be prepared identifying whether resources were encountered.
- Final Grading
 - A final report shall be prepared substantiating that earth-disturbing activities are completed and whether cultural resources were encountered.
- Cultural Material Conveyance.
 - The final report shall include evidence that all prehistoric materials have been repatriated to a tribe of appropriate cultural affinity; or that they have been curated at a San Diego curation facility or Tribal curation facility that meets federal standards per 36 CFR Part 79.
 - The final report shall include evidence that all historic materials have been curated at a San Diego curation facility that meets federal standards per 36 CFR Part 79.

As previously discussed, the GPU EIR determined impacts to archaeological resources as less than significant with mitigation. The Project determined impacts to archaeological resources as potentially significant. However, the Project would incorporate specific mitigation measure for Archaeological Monitoring as identified by the GPU EIR Mitigation Measure Cul-2.5, for a less than significant impact with mitigation. Therefore, the Project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 5(c) The GPU EIR concluded this impact to be less than significant. The site does not contain any unique geologic features that have been listed in the County's Guidelines for Determining Significance for Unique Geology Resources nor does the site support any known geologic characteristics that have the potential to support unique geologic features. Therefore, the project would not result in a significant impact to a unique geologic feature.

As previously discussed, the GPU EIR determined impacts on unique geologic features as less than significant. As the Project would have a less-than-significant impacts for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 5(d) The GPU EIR concluded this impact to be less than significant with mitigation. A review of the County's Paleontological Resources Maps and data on San Diego County's geologic formations indicates that the project is underlain by Cretaceous Plutonic and Quaternary Alluvium, which has a low potential for containing paleontological resources. Low resource potential and low sensitivity are assigned to geologic formations that, based on their relatively young age and/or high energy depositional history, are judged unlikely to produce unique fossil remains. Low resource potential formations rarely produce fossil remains of scientific significance and are considered to have low sensitivity (County 2007). Pursuant to the County's Guidelines for Determining Significance – Paleontological Resources (2009), projects within areas of Low or Marginal Potential are required to be monitored by a Standard Monitor. Therefore, because specific grading details, including depth of excavation, are not known at this time; future discretionary actions would be subject to mitigation identified by the GPU EIR as mitigation measure Cul-3.1.

Project Mitigation

The following is the project mitigation measure:

- **Paleontological Monitoring:** For any excavation into the substratum that does not require the expertise of a Project Paleontologist as described in Section 6.3.1 of the Paleontological Guidelines (2009), incidental monitoring by a Standard Monitor is required. A Standard Monitor is any one person who is on the site during all the original cutting of undisturbed substratum. A Standard Monitor must be designated by the project applicant and given the responsibility of watching for fossils so that the project is in conformance with Section 87.430 of the Grading Ordinance. If a fossil of greater than 12 inches in any dimension, including circumference, is encountered during excavation or grading, all excavation operations in the area where the fossil was found shall be suspended immediately, the Department of Planning & Development Services Permit Compliance

Coordinator shall be notified, and a Project Paleontologist shall be retained by the project proponent to assess the significance of the find and, if the fossil is significant, to oversee the salvage program, including salvaging, cleaning, and curating the fossil(s), and documenting the find, as follows:

- If no fossils of greater than 12 inches in any dimension are found during grading and excavation, a letter shall be submitted to the County Department of Planning & Development Services identifying who conducted the monitoring, stating that no fossils were found, and signed by the Standard Monitor. The letter shall be submitted to the County within 90 days following cessation of grading and excavation.
- If fossils meeting the description above are found and the services of a Project Paleontologist are retained, the paleontologist will prepare a report documenting the mitigation program, including field and laboratory methodology, location and the geologic and stratigraphic setting, list(s) of collected fossils and their paleontological significance, descriptions of any analyses, conclusions, and references cited. The report shall include appropriate graphics (index map, fossil localities, stratigraphic column) and photographic documentation of where the fossil(s) and other paleontological resources were found. A summary stratigraphic section shall be included that records the stratigraphic section exposed by the excavation (i.e., lithology and stratigraphic thicknesses) and stratigraphic positions of recovered paleontological resources, to the extent possible.
- Two hard copies and an electronic copy of the report shall be submitted to the Director, Department of Planning & Development Services Use of the County of San Diego within 90 days following the collection of fossils on the project site. Exceptions will be considered by the County Department of Planning & Development Services. Reports are to be submitted to the Director of Planning & Development Services at 5510 Overland Ave., Suite 310, San Diego, CA 92123-1666.

With the implementation of the above mitigation measures identified by GPU EIR mitigation measure Cul-3.1, no impacts would occur to a unique paleontological resource or site.

As previously discussed, the GPU EIR determined impacts on paleontological resources as less than significant with mitigation. The proposed Project determined impacts to paleontological resources as potentially significant. However, the proposed Project would incorporate the GPU EIR mitigation measures Cul-3.1 for a less than significant impact with mitigation. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 5(e) The GPU EIR concluded this impact to be less than significant with mitigation. Interred human remains exist on the project site. This is known because site P-37-025270/CA-SDI-16762, known as a pioneer cemetery, is present in the project area. This resource was originally recorded in 2003 by California State Parks, Colorado Desert Archaeological Society, and Mt. Empire Historical Society volunteers as a site and potential contributor to a district. The site record identified a late nineteenth century

pioneer cemetery northeast of the intersection of Moore Road and J.E.B. Stuart Road. The pioneer cemetery consists of a 30- by 18-foot area surrounded by a 4-foot-high field fence supported by assorted 2- by 4-inch and 4- by 6-inch lengths of lumber. No records or headstones are associated with this cemetery; however, an inventory from 1949 gives a listing of names including "Allister (?) Gaskill, Honora Gaskill, Mrs. Beckley" and others. According to the 2006 NRHP nomination form, when Camp Lockett was undergoing construction in 1941 the USACE conferred with local residents including the McCain family and agreed to preserve and avoid disturbing the cemetery. The site was evaluated in 2006 and found to be significant pursuant to the NRHP and State CEQA Guidelines Section 15064.5. Potential impacts on this significant resource would be reduced with the implementation of the following mitigation measures identified in Cultural Resources 5(b): Archaeological Monitoring. Therefore, the project will not result in any significant impact on human remains within the project area.

As previously discussed, the GU EIR determined impacts to human remains as less than significant with mitigation. The proposed Project determined impacts to human remains as potentially significant. However, the proposed Project would incorporate the GPU EIR mitigation measure Cul-2.5 for a less than significant impact with mitigation. Therefore, the Project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR

Conclusion

With regards to the issue area of cultural/paleontological resources, the following findings can be made:

1. No peculiar impacts to the Project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. Feasible mitigation measures contained within the GPU EIR (Cul-1.1, Cul-1.3, Cul-2.5 and Cul-3.1), would be applied to the Project. Those mitigation measures, detailed above, require future project assessments, paleontological monitoring during grading, as well as implement the requirements of the Grading Ordinance to minimize impacts to paleontological resources.

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
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6. Energy Use – Would the Project:

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

☐☐☐

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

☐☐☐

Discussion

Energy use was not specifically analyzed within the GPU EIR as a separate issue area under CEQA. At the time, Energy Use was contained within Appendix F of the CEQA Guidelines and since then has been moved to the issue areas within Appendix G of the CEQA Guidelines. However, the issue of energy use in general was discussed within the GPU and the GPU EIR. For example, within the Conservation and Open Space Element of the GPU, Goal COS-15 promotes sustainable architecture and building techniques that reduce emissions of criteria pollutants and GHGs, while protecting public health and contributing to a more sustainable environment. Policies, COS-15.1, COS-15.2, and COS-15.3 would support this goal by encouraging design and construction of new buildings and upgrades of existing buildings to maximize energy efficiency and reduce GHG. Goal COS-17 promotes sustainable solid waste management. Policies COS-17.1 and COS-17.5 would support this goal by reducing GHG emissions through waste reduction techniques and methane recapture. The analysis below specifically analyzes the energy use of the Project.

- 6(a) The Project would increase the demand for electricity and natural gas at the Project site and gasoline consumption at the Project site during construction and operation, relative to existing conditions. CEQA requires mitigation measures to reduce “wasteful, inefficient and unnecessary” energy usages (Public Resources Code Section 21100, subdivision [b][3]). Neither the law nor the State CEQA Guidelines establish criteria that define wasteful, inefficient, or unnecessary use. Compliance with the California Code of Regulations 2019 Title 24 Part 6 Building Code would result in highly energy-efficient buildings. However, compliance with building codes does not adequately address all potential energy impacts during construction and operation. The Project includes renovation and development within the project area to support local tourism. Development would include the construction of exhibits, additional community amenities and educational programs intended to attract additional visitors to the project area. The project would result in the use of electricity, natural gas, petroleum, and other consumption of energy resources during both construction and operation.

Grading and Construction

During the grading and construction phases of the Project, the primary energy source utilized would be petroleum from construction equipment and vehicle trips. To a lesser extent, electricity would also be consumed for the temporary electric power for as-

necessary lighting and electronic equipment. Activities including electricity would be temporary and negligible; therefore, electricity use during grading and construction would not result in wasteful, inefficient, or unnecessary consumption of energy. In addition, natural gas is not anticipated to be required during construction of the proposed Project. Any minor amounts of natural gas that may be consumed as a result of the Project construction would be temporary and negligible and would not have an adverse effect; therefore, natural gas used during grading and construction would also not result in wasteful, inefficient, or unnecessary consumption of energy.

The energy needed for the Project grading and construction would be temporary and is not anticipated to require additional capacity or increase peak or base period demands for electricity or other forms of energy. The Project would rely on petroleum consumption throughout the grading as well as the construction phases. Fuel consumed by construction equipment would be the primary energy resources expended over the course of grading and construction. Vehicle trips associated with the transportation of construction materials and construction workers commutes would also result in petroleum consumption, but to a lesser extent. Petroleum consumptions would be necessary for operation and maintenance of construction equipment and would not be beyond what is necessary for the Project.

The project would also be required to comply with the Construction and Demolition Materials Diversion Ordinance (Sections 68.511 through 68.518 of the County Code of Regulatory Ordinances). The ordinance requires that 90% of inert material (concrete, asphalt, dirt, etc.) and 65% of all other materials must be recycled from the project. The ordinance also requires projects to recycle or reuse 100% of excavated soils, trees, stumps, rocks, and vegetation. In order to comply with the ordinance, proponents must submit a Debris Management Plan and a fully refundable Performance Guarantee prior to building permit issuance. This ultimately will result in less energy use overall as the demolished materials will be reused after recycling.

Due to the aforementioned factors, the project's energy consumption during grading and construction would not be considered wasteful, inefficient, or unnecessary.

Operational

Operation of the Project would be typical of commercial land uses requiring natural gas for space and water heating and potential landscape maintenance activities. Indirect energy use would include wastewater treatment and solid waste removal at offsite facilities.

The Project would implement additional sustainability measures that are feasible right now at the program level. Please refer to Greenhouse Gas 8(a) for 25 sustainability measures. Several of these measures relate to energy such as on-site electric vehicle (EV) charging capabilities, on-site renewable energy generation, cool roofs and "cool parking", solar-ready roofs, energy-efficient lighting for street, parking and area lighting, etc. Each discretionary project that is proposed after the adopted of the Master Plan would be required to evaluate and substantiate the feasibility of these measures prior to approval until such time a Climate Action Plan is adopted by the County.

In addition to the above sustainability measures, fuel efficiency of vehicles is expected to increase as older vehicles are replaced with newer, more efficient models throughout the lifetime of this project. As such, the amount of petroleum consumed as a result of vehicles trips to and from the Project site during operation would decrease over time. State and Federal regulations regarding standards for vehicles (e.g. Advanced Clean Cars Program, CAFÉ Standards) are designed to reduce wasteful, unnecessary, and inefficient use of fuel. The coupling of various State policies and regulations such as the Zero-Emission Vehicles Mandate and Senate Bill 350 would result in the deployment of electric vehicle which would be powered by an increasingly renewable electrical grid. These actions would reduce energy use compared to other similar projects consistent with the General Plan.

The Project would use electricity for site and parking lot lighting and appliances and lighting within the commercial and retail spaces. The Project would be required to meet Title 24 of the California Building Code, which establishes energy efficiency standards for buildings to reduce energy demand and consumption. In addition, the project would be required to incorporate carpool and vanpool-only parking spaces, and electric vehicle-only parking incorporated per CALGreen Standards. The Project is consistent with the General Plan and would not be expected to result in wasteful, inefficient, or unnecessary electric energy usage throughout Project operations.

As previously discussed, the GPU EIR did not analyze Energy as a separate issue area under CEQA. Energy was analyzed under the GPU and GPU EIR and has been incorporated within General Plan Elements. The Project would not conflict with policies with the GPU related to energy use, nor would it result in the wasteful, inefficient, or unnecessary consumption of energy resources, as specified within Appendix G of the CEQA Guidelines.

- 6(b) Many of the regulations regarding energy efficiency are focused on increasing the energy efficiency of buildings and renewable energy generation, as well as reducing water consumption and vehicle miles traveled (VMT). As stated in Energy 6(a), the project would utilize various energy efficient and savings measures that meet and exceed the regulatory requirements.

In addition, the project would be consistent with several energy reduction policies of the Conservation and Open Space Element of the County General Plan, including policies COS-14.1, COS-14.3, and COS-16.2. The project would be consistent with Goal COS-15, which promotes sustainable architecture and building techniques that reduce emissions of criteria pollutants and GHGs, while protecting public health and contributing to a more sustainable environment. Policies COS-15.1, COS-15.2, COS-15.3, and COS-15.4, would support this goal by encouraging design and construction of new buildings and upgrades of existing buildings to maximize energy efficiency and reduce GHG emissions. Goal COS-17 promotes sustainable solid waste management. Policies COS-17.1 and COS-17.2 would support this goal by reducing GHG emissions through waste reduction techniques and recycling and reuse of construction and demolition waste.

As previously discussed, the GPU EIR did not analyze Energy as a separate issue area under CEQA. Energy was analyzed under the GPU and GPU EIR and has been incorporated within General Plan Elements. The Project would not conflict with policies

within the GPU related to energy use or conflict with or obstruct a state or local plan for renewable energy or energy efficiency as specified within Appendix G of the CEQA Guidelines.

Conclusion

With regards to the issue area of Energy, the following findings can be made:

1. No peculiar impacts to the Project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. No mitigation measures contained within the GPU EIR would be required because Project specific impacts would be less than significant. Therefore, the Project would not result in an impact which was not adequately evaluated by the GPU EIR.

7. Geology and Soils – Would the Project:

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving: (i) rupture of a known earthquake fault, (ii) strong seismic ground shaking or seismic-related ground failure, (iii) liquefaction, and/or (iv) landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in an on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion

- 7(a)(i) The GPU EIR concluded this impact to be less than significant. The project area is not located in a fault rupture hazard zone identified by the Alquist-Priolo Earthquake Fault Zoning Act, Special Publication 42 (SP 42), Revised 1997, Fault-Rupture Hazards Zones in California, or within any other area with substantial evidence of a known fault. The project site is not located in a County Special Study Zone, which signifies late-Quaternary faults mapped by the California Geological Survey (CGS), formerly the

California Division of Mines and Geology (DMG), that have been designated by the County (San Diego County 2007). Therefore, there would be no impact from the exposure of people or structures to adverse effects from a known fault-rupture hazard zone as a result of this project.

- 7(a)(ii) The GPU EIR concluded this impact to be less than significant. To ensure the structural integrity of all buildings and structures, the Project must conform to the Seismic Requirements as outlined within the California Building Code of Regulations, Title 24. In addition, the San Diego County Code Section 87.101 requires a soils compaction report with proposed foundation recommendation would be required to be approved before the issuance of a building permit. Therefore, compliance with the California Building Code and the County Building Code would ensure that the Project would not result in a significant impact from the exposure of people or structures to potential adverse effects from strong seismic ground shaking.
- 7(a)(iii) The GPU EIR concluded this impact to be less than significant. A portion of all project entities within the development boundary are located within a "Potential Liquefaction Area," as identified in the County Guidelines for Determining Significance for Geologic Hazards. Feasible foundation designs exist that can mitigate the liquefaction hazard (including liquefaction-induced lateral spreading). In order to assure that any proposed buildings (including those proposed within the project entities) are adequately supported (whether on native soils, cut, or fill), a Soils Engineering Report is required as part of the Building Permit process, per Section 87.101 of the County Code. That report would evaluate the strength of underlying soils and make recommendations on the design of building foundation systems. The Soils Engineering Report must demonstrate that a proposed building meets the structural stability standards required by the California Building Code, and the report must be approved by the County prior to the issuance of a Building Permit.
- 7(a)(iv) The GPU EIR concluded this impact to be less than significant. The project area is located within a "Landslide Susceptibility Area" as identified in the County Guidelines for Determining Significance for Geologic Hazards. Landslide Susceptibility Areas were developed based on landslide risk profiles included in the *Multi-Jurisdictional Hazard Mitigation Plan, San Diego, CA* (County 2017). Landslide risk areas from this plan were based on data including steep slopes (greater than 25%), soil series data (San Diego Association of Governments [SANDAG], based on U.S. Geological Survey [USGS] 1970s series), soil-slip susceptibility from USGS, and Landslide Hazard Zone Maps (limited to western portion of the County) developed by the California Department of Conservation, Division of Mines and Geology (DMG). Also included within Landslide Susceptibility Areas are gabbroic soils on slopes steeper than 15% in grade because these soils are slide prone.

The area of landslide susceptibility within the project site is relatively flat, and future development within the development boundary would be constructed in compliance with the most current California Building Code requirements to ensure structural stability. Construction of future development would not require significant grading into hillside areas or any other activity that would exacerbate existing geologic or seismic conditions. Therefore, the project would not cause an impact from the exposure of people or structures to adverse effects of landslides.

As previously discussed, the GPU EIR determined less than significant impacts from exposure to seismic-related hazards and soil stability. As the proposed Project would have a less-than-significant impact with the incorporation of Project conditions for a geological soils report, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 7(b) The GPU EIR concluded this impact to be less than significant. According to the United States Department of Agriculture (USDA) Web Soil Survey, the soils within the development boundary are identified as the following: Mottsville loamy coarse sand, 2 to 9% slopes (MvC); La Posta rocky loamy coarse sand, 5 to 30% slopes, eroded (LcE2); Mottsville loamy coarse sand, 0 to 2% slopes (MvA); and Calpine coarse sandy loam, 9 to 15% slopes eroded (CaD2) (USDA 2019). The soil erodibility rating of these soils range from “moderate” to “severe” as indicated by the *Soil Survey for the San Diego Area*, prepared by the USDA, Soil Conservation and Forest Service dated December 1973. However, future development within the development boundary would not result in substantial soil erosion or the loss of topsoil for the following reasons:

- Future development would not result in unprotected erodible soils; would not alter existing drainage patterns; is not located in a floodplain, wetland, or significant drainage feature; and would not develop steep slopes.
- A Storm Water Quality Management Plan would be required to be prepared prior to issuance of a Building Permit. The Storm Water Quality Management Plan would include Best Management Practices (BMPs) to ensure sediment does not erode from the project site. BMPs would potentially include the following:
 - The County Standard lot perimeter protection detail and the County Standard desilting basin would be used as the erosion control method for disturbed flat areas.
 - Hydraulic stabilization hydroseeding would be used as the erosion control measure on disturbed slopes.
 - Sediment control measures such as silt fence, fiber rolls, sandbags, storm drain inlet protection, and an engineered desilting basin would be used for all disturbed onsite areas.
 - A stabilized construction entrance and street sweeping and vacuuming would be used to prevent offsite tracking of sediment.
 - For runoff or dewatering operation that is concentrated, water velocity would be controlled using an energy dissipater outlet protection.

Future development within the project site would involve grading. However, the project is required to comply with the San Diego County Code of Regulations, Title 8, Zoning and Land Use Regulations, Division 7, Sections 87.414 (Drainage – Erosion Prevention) and 87.417 (Planting). Compliance with these regulations minimizes the potential for water and wind erosion.

Due to the above factors, the project would not result in substantial soil erosion or the loss of topsoil.

As previously discussed, the GPU EIR determined impacts from soil erosion and topsoil loss to be less than significant. As the Project would have a less-than-significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 7(c) The GPU EIR concluded this impact to be less than significant. The amount of grading that would be required for future development is unknown at this time and could result in the creation of areas of cut and areas underlain by fill. In order to assure that any proposed buildings within the development boundary are adequately supported (whether on native soils, cut, or fill), per Section 87.101 of the County Code, a Soils Engineering Report is required as part of the Building Permit process. This report would evaluate the strength of underlying soils and make recommendations on the design of building foundation systems. The Soils Engineering Report must demonstrate that a proposed building meets the structural stability standards required by the CBC. The report must be approved by the County prior to the issuance of a Building Permit. For further information regarding landslides, liquefaction, and lateral spreading, see Geology and Soils response 7(a)(iii-iv).

As previously discussed, the GPU EIR determined impacts from soil stability to be less than significant. As the proposed Project would have a less-than-significant impact with the incorporation of standard conditions, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 7(d) The GPU EIR determined impacts from expansive soils to be less than significant. The development boundary within the project site is located on expansive soils as defined by 2016 CBC Section 1803.5.3. The soils on site are identified as Mottsville loamy coarse sand, La Posta rocky loamy coarse sand, and Calpine coarse sandy loam. These soils have a low shrink-swell behavior and represent no substantial risks to life or property. In addition, all future development projects would be required to conform to the Building Code with implementation of standard engineering techniques, ensuring structural safety.

As previously discussed, the GPU EIR determined impacts from expansive soils to be less than significant. As the proposed Project would have a less-than-significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 7(e) The GPU EIR concluded this impact to be less than significant. Project entities including SYH, MTM, and portions of the CLEEF and PSRM would rely on sewer services provided by Campo Water Maintenance District for the disposal of wastewater. Only CLEEF has an existing septic system for wastewater that has been previously permitted. Additionally, no extension of sewer or utility lines is proposed at this time. Therefore, no impacts related to unsuitable soils for septic systems would occur.

As previously discussed, the GPU EIR determined impacts to wastewater disposal systems to be less than significant. As the proposed Project would have a less-than-significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

Conclusion

With regards to the issue area of Geology and Soils, the following findings can be made:

1. No peculiar impacts to the Project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. No mitigation measures contained within the GPU EIR would be required because Project specific impacts would be less than significant by adhering to the Project conditions of approval, which are consistent with the GPU EIR.

8. Greenhouse Gas Emissions – Would the Project:

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Analysis

- 8(a) The GPU EIR concluded this impact to be less than significant with mitigation. The General Plan identified several mitigation measures, including CC-1.1, CC-1.5, CC-1.10 and CC-1.11, which encourage incentives for energy efficient development, coordination with the San Diego County Water Authority and other water agencies, and implementation of the Ordinance Relating to Water Conservation for Landscaping. These measures are further refined below and will be required to be implemented as feasible for subsequent projects implemented under the Master Plan.

For background, in February 2018, the County Board of Supervisors adopted the *County of San Diego Climate Action Plan* (CAP) that included strategies and measures to reduce GHG emissions from the unincorporated County and County government operations. These strategies and measures were developed to reduce GHG emissions by 2020 and 2030, in line with the State's legislative GHG reduction targets through AB 32 and SB 32 and demonstrate progress toward the State's 2050 GHG reduction goal. In December 2018, because of the lawsuit filed against the County and the CAP, the San Diego County Superior Court issued a writ ordering the approval of the CAP and associated SEIR be set aside. In June 2020, this decision

was upheld by the California Court of Appeal, Fourth District following the County's appeal of the San Diego County Superior Court decision and the County Board of Supervisors subsequently rescinded approvals of the CAP, SEIR and related approvals in September 2020. Through the holding of this decision, the County's CAP can no longer be considered the applicable plan in the unincorporated County for the purpose of reducing GHG emissions, and consistency with the CAP cannot be used as a determination of significance until such a time as it is reapproved in compliance with CEQA. However, GHG reduction strategies and measures included in the CAP continue to be implemented pending preparation of an updated CAP for consideration by the County Board of Supervisors.

Until such time that a Climate Action Plan is adopted by the County, subsequent projects implemented under the Master Plan would be required to comply with applicable GPU mitigation measures. This includes GPU mitigation measures CC-1.7, which states to incorporate the recommendations of the California Air Resources Board (CARB) related to climate change. Though CARB has not released a threshold of significance, CARB developed a 2017 Scoping Plan, which is intended to reduce GHG emissions to meet the statewide targets set forth in AB 32 and SB 32 and provides examples of local actions that can be implemented to support the State's climate goals.

As previously described, the Master Plan provides a framework to renovate and develop Camp Lockett as a historic campus and a local tourism area supported by community amenities, educational programs, and other similar services. The Master Plan does not specifically propose development at this time, though it does identify conceptual uses. Therefore, it is reasonably foreseeable that the approval of the Master Plan could lead to future development, which would result in GHG emissions due to construction activities and operational aspects of the project (building energy use, vehicle trips). This section intends to provide policy framework of GHG reduction measures that future projects can implement, as feasible.

The 25 measures identified below correlate with the GPU mitigation measures CC-1.1 through CC-1.19. Each discretionary project that is proposed after the adoption of the Master Plan will be required to evaluate and substantiate the feasibility of these measures prior to approval until such time a CAP is adopted by the County.

Construction Measures

1. Enforce idling time restrictions for construction vehicles.
2. Require construction vehicles to operate with the highest tier engines commercially available.
3. Divert and recycle construction and demolition waste, and use locally-sourced building materials with a high recycled material content to the greatest extent feasible.
4. Increase use of electric and renewable fuel powered construction equipment and require renewable diesel fuel where commercially available.
5. Require diesel equipment fleets to be lower emitting than any current emission standard.

Transportation Measures

6. Require on-site EV charging capabilities for parking spaces serving the project to meet jurisdiction-wide EV proliferation goals.
7. Allow for new construction to install fewer on-site parking spaces than required by local municipal building code, if appropriate.
8. Dedicate on-site parking for shared vehicles.
9. Provide adequate, safe, convenient, and secure on-site bicycle parking and storage
10. Provide on- and off-site safety improvements for bike, pedestrian, and transit connections, and/or implement relevant improvements identified in an applicable bicycle and/or pedestrian master plan.

Project Design Measures

11. Require on-site renewable energy generation.
12. Prohibit wood-burning fireplaces in new development and require replacement of wood-burning fireplaces for renovations over a certain size developments.
13. Require cool roofs and “cool parking” that promotes cool surface treatment for new parking facilities as well as existing surface lots undergoing resurfacing.
14. Require solar-ready roofs.
15. Require low-water landscaping in new developments (see CALGreen Divisions 4.3 and 5.3 and the Model Water Efficient Landscape Ordinance [MWELO], which is referenced in CALGreen). Require water efficient landscape maintenance to conserve water and reduce landscape waste.
16. Require the design of bike lanes to connect to the regional bicycle network.
17. Expand urban forestry and green infrastructure in new land development.
18. Require preferential parking spaces for park and ride to incentivize carpooling, vanpooling, commuter bus, electric vehicles, and rail service use.
19. Require a transportation management plan for specific plans which establishes a numeric target for non-SOV travel and overall VMT.
20. Require electric vehicle charging station (Conductive/inductive) and signage for non- residential developments.
21. Provide electric outlets to promote the use of electric landscape maintenance equipment to the extent feasible on parks and public/quasi-public lands.
22. Require buildings to utilize low flow water fixtures such as low flow toilets and faucets (see CALGreen Divisions 4.3 and 5.3 as well as Appendices A4.3 and A5.3)
23. Require the use of energy-efficient lighting for all street, parking, and area lighting.
24. Require the landscaping design for parking lots to utilize tree cover and compost/mulch.
25. Incorporate water retention in the design of parking lots and landscaping, including using compost/mulch.

As previously discussed, the GPU EIR determined impacts on GHG emissions to be less than significant. The Master Plan is consistent with the land use designations of the General Plan and therefore would not increase emissions compared to the analysis within the GPU EIR. In addition, as subsequent projects are proposed and come forward for discretionary permits, each project would be required to implement the 25 measures identified above, as feasible. These measures are in line with the numerous mitigation measures of the GPU EIR. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 8(b) The GPU EIR concluded this impact to be less than significant. As described above, the Project would not result in a cumulatively considerable contribution to global climate change. As such, the Project would be consistent with County goals and policies included in the County General Plan that address greenhouse gas reductions. Therefore, the Project would be consistent with emissions reduction targets of Senate Bill 32 and the Global Warming Solutions Act. Each project proposed under the Master Plan would be required to implement the 25 measures identified above, as feasible. These measures outline project design features for energy efficiency related to lighting, water heating, and photovoltaic systems.

The Project would not conflict with any applicable plan, policy or regulation adopted for the purpose of reducing emissions of greenhouse gas emissions. As previously discussed, the GPU EIR determined impacts to applicable regulation compliance to be less than significant. As the proposed Project would have a less-than-significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

Conclusion

With regards to the issue area of Global Climate Change, the following findings can be made:

1. No peculiar impacts to the Project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. No mitigation measures contained within the GPU EIR would be required because Project specific impacts would be less than significant.

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
9. Hazards and Hazardous Materials – Would the Project:			
a) Create a significant hazard to the public or the environment through the routine transport, storage, use, or disposal of hazardous materials or wastes or through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<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, or is otherwise known to have been subject to a release of hazardous substances and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<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, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
h) Propose a use, or place residents adjacent to an existing or reasonably foreseeable use that would substantially increase current or future resident's exposure to vectors, including mosquitoes, rats or flies, which are capable of transmitting significant public health diseases or nuisances?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion

- 9(a) The GPU EIR concluded this impact to be less than significant. Construction activities associated with future development of the project site would involve routine transport, use, and disposal of typical hazardous materials such as solvents, paints, oils and grease. Such transport, use, and disposal must be compliant with applicable regulations such as the Resource Conservation and Recovery Act (RCRA), U.S. Department of Transportation (DOT) Hazardous Materials Regulations, and the San Diego County Department of Environmental Health Hazardous materials Division (DEH HMD) regulations. Although small amounts of hazardous materials would be transported, used, and disposed during construction, these materials are typically used in construction projects and would not represent the transport, use and disposal of acutely hazardous materials that would create a significant hazard to the public or environment.

Future development associated with the project could also require the demolition of existing structures (subject to the "H" Special Area Designator). Due to the age of many buildings and other structures within the project site, it is likely that lead-based paint and asbestos-containing materials are present. Demolition of these structures could release lead-based paint and asbestos-containing materials into the environment. However, implementation of standard conditions would be required for all future discretionary actions pursuant to Federal, State and Local Regulations and the County Guidelines for Determining Significance for Hazards and Hazardous Materials as determined by County staff and the Department of Environmental Health. These standard conditions were identified by the GPU EIR under the Existing Regulatory Processes.

Project Conditions

The following are the project conditions of approval:

- **Lead-Based Paint:** Prior to issuance of a building permit that includes demolition of onsite structures and prior to commencement of demolition or renovation activities, a survey shall be performed by a California Department of Health Services (DHS) certified lead inspector/risk assessor to determine the presence or absence of lead-based paint located in structures proposed for demolition. All lead containing materials scheduled for demolition shall comply with applicable regulations for demolition methods and dust suppression. Lead containing materials shall be managed in accordance with applicable regulations including, at a minimum, the hazardous waste disposal requirements (22 CCR 4.5), the worker health and safety requirements (8 CCR 1532.1), and the State Lead Accreditation, Certification, and Work Practice Requirements (17 CCR 1(8)).
- Prior to the issuance of a grading permit or demolition permit, the contractor shall show proof to the County of San Diego that a Certified Lead Inspector/Assessor, as defined in 17 CCR 35005, and in accordance with all applicable laws pertaining to the handling and disposal of lead-based paint, has been retained to perform demolition and removal of all existing onsite structures constructed before 1979. Lead-based materials exposure is regulated by the California Division of Occupational Safety and Health (Cal/OSHA). California Code of Regulations, Title 8, Section 1532.1 requires testing, monitoring, containment, and disposal of lead-based materials so that

exposure levels do not exceed California Division of Occupational Safety and Health standards.

- **Asbestos-Containing Material:** Prior to issuance of a building permit that includes demolition of onsite structures and prior to commencement of demolition or renovation activities, a facility survey shall be performed to determine the presence or absence of ACMs, regardless of the age of the facility. Facility surveys must be completed in compliance with Section (d) of Rule 1206, adopted by the San Diego Air Pollution Control District. Suspect materials that will be disturbed by the demolition or renovation activities shall be sampled and analyzed for asbestos content or assumed to be asbestos containing. The survey shall be conducted by a person certified by Cal/OSHA pursuant to regulations implementing subdivision (b) of Section 9021.5 of the Labor Code and shall have taken and passed an EPA-approved Building Inspector Course. Should regulated asbestos-containing materials be found, they shall be handled in compliance with the San Diego County Air Pollution Control District Rule 361.145 – Standard for Demolition and Renovation. Evidence of completion of the facility survey shall consist of a signed, stamped statement from the person certified to complete the facility survey indicating that the survey has been completed and that either regulated asbestos is present or absent. If present, the letter shall describe the procedures that will be taken to remediate the hazard.
- At least 10 working days prior to the issuance of the demolition permit or commencement of any asbestos stripping or removal work (such as site preparation that would break up, dislodge, or similarly disturb ACM, the contractor shall submit an Asbestos Demolition or Renovation Operational Plan (Notice of Intention) to the County of San Diego. The plan shall be prepared by an asbestos consultant licensed with the California State Licensing Board and certified by the California Division of Occupational Safety and Health to conduct an asbestos inspection in compliance with the asbestos National Emission Standards for Hazardous Air Pollutants requirements. The asbestos National Emission Standards for Hazardous Air Pollutants, as specified under 40 CFR 61, Subpart M (enforced locally by the San Diego Air Pollution Control District, under authority, per Regulation XI, Subpart M – Rule 361.145), requires the Asbestos Demolition or Renovation Operational Plan to include the facility information, project description, presence of asbestos, removal and demolition contractors, means of waste transportation off site, contingency plan, and certified specialist who shall be present on site during removal of asbestos. Removal of all ACM or presumed ACM on the project site shall be monitored by the certified asbestos consultant and shall be performed in accordance with all applicable laws, including 8 CCR 1529, Asbestos; Occupational Health and Safety Administration and California Division of Occupational Safety and Health standards; and the San Diego Air Pollution Control District's Rule 361.145, Standard for Demolition and Renovation. Notification of at least 10 days of any removal or demolition work and payment of the appropriate fee(s) is required by the San Diego Air Pollution Control District.

Operation of proposed uses within the development boundary, such as commercial, visitor-serving uses, museums, and the equestrian facility, would not involve the routine use and storage of hazardous materials. Prior to obtaining a building permit, project would be required to conform to Section 65850.2 of the California Government Code which prohibits building departments from issuing a final Certificate of Occupancy to businesses or facilities that handle hazardous materials unless they have submitted and met the requirements of Health and Safety Code, Division 20, Chapter 6.95, Article 2, Section 25500-25520, which requires the establishment of a Hazardous Materials Business Plan.

In addition, the DEH HMD is the Certified Unified Program Agency (CUPA) for San Diego County responsible for enforcing Chapter 6.95 of the Health and Safety Code. As the CUPA, the DEH HMD is required to regulate hazardous materials business plans and chemical inventory, hazardous waste and tiered permitting, underground storage tanks, and risk management plans. The Hazardous Materials Business Plan is required to contain basic information on the location, type, quantity, and health risks of hazardous materials stored, used, or disposed of on site. The plan also contains an emergency response plan that describes the procedures for mitigating a hazardous release, procedures and equipment for minimizing the potential damage of a hazardous materials release, and provisions for immediate notification of the DEH HMD, the Office of Emergency Services, and other emergency response personnel such as the local Fire Agency having jurisdiction. Implementation of the emergency response plan facilitates rapid response in the event of an accidental spill or release, thereby reducing potential adverse impacts. Furthermore, the DEH HMD is required to conduct ongoing routine inspections to ensure compliance with existing laws and regulations, to identify safety hazards that could cause or contribute to an accidental spill or release, and to suggest preventative measures to minimize the risk of a spill or release of hazardous substances.

Therefore, due to the low quantity of hazardous materials used during construction, the strict requirements that regulate hazardous substances outlined above, implementation of above mitigation measures as discussed by the GPU EIR under Existing Regulatory Processes, and the fact that the initial planning, future monitoring, and inspections would occur in compliance with local, state, and federal regulation, the project would not result in any potentially significant impacts related to the routine transport, use, and disposal of hazardous substances or related to the accidental explosion or release of hazardous substances.

As previously discussed, the GPU EIR determined impacts from transport, use and disposal of hazardous materials and accidental release of hazardous materials to be less than significant. The project would have a less-than-significant impact with standard project conditions as mentioned above and consistent with the GPU EIR discussion under Existing Regulatory Processes. Thus, for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 9(b) The GPU EIR concluded this impact to be less than significant. The closest existing school to the development boundary is Camp Lockett Middle School, approximately 0.3 mile west of the development boundary at 31360 Highway 94, Campo CA. While MEUSD intends, ultimately, to adaptively reuse 13 existing buildings for a middle school campus, they are not currently proposing uses as part of the project. Note that any future alterations or renovations to existing uses or development would need to conform to the existing civic use permitted as part of this project.

Although the project is located within one-quarter mile of a potential future school site (a school is not currently proposed), construction of future development associated with the project would not involve the handling, storage, or transport of acutely hazardous materials. As discussed in Hazards and Hazardous Materials 9(a), construction would require the minor use of typical hazardous materials; however, this use is controlled by multiple federal, state, and local regulations. In addition, the standard conditions identified under Hazards and Hazardous Materials 9(a) would reduce impacts related to demolition and removal of Lead-Based Paint and Asbestos-Containing Materials.

Operation of future projects within the development boundary would also not involve the use of hazardous or acutely hazardous materials. As discussed above, Section 65850.2 of the California Government Code and Health and Safety Code, Division 20, Chapter 6.95, Article 2, Section 25500-25520 regulate the use of hazardous materials. Therefore, due to the low quantity of hazardous materials used during construction, the strict requirements that regulate hazardous substances outlined above, implementation of standard project conditions discussed in the GPU EIR Existing Regulatory Condition, and the fact that the initial planning, future monitoring, and inspections would occur in compliance with local, state, and federal regulation, the project would not result in any potentially significant impacts related to hazardous or acutely hazardous emissions, materials, substances, or waste within one-quarter mile of an existing or proposed school.

As previously discussed, the GPU EIR determined impacts from hazards to schools to be less than significant. As the proposed Project would have a less-than-significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 9(c) The GPU EIR concluded this impact to be less than significant. The project does not propose structures for human occupancy or significant linear excavation within 1,000 feet of an open, abandoned, or closed landfill; is not located on or within 250 feet of the boundary of a parcel identified as containing burn ash (from the historic burning of trash) (County of San Diego 2011b, Envirostor 2019, Geotracker 2019); and is not located on a site with the potential for contamination from historic uses such as industrial uses, a gas station, or vehicle repair shop. In addition, no operating solid waste facilities are located within the development boundary (CalRecycle 2019).

Based on the regulatory database search, the development boundary has been subject to a release of hazardous substances that could create a significant hazard to the public or environment. A Formerly Used Defense Site (FUDS) and a Leaking Underground Storage Tank (LUST) cleanup site have been identified within the

development boundary, as identified in Table 6 (Envirostor 2019, Geotracker 2019). In addition, parts or all of the development boundary may have been subject to historical agricultural uses (County of San Diego 2011).

Table 6. Open/Closed Hazardous Waste Sites within the Development Boundary

Site Name/Address	Site Type	Cleanup Status	Contaminants of Potential Concern	Potential Media Affected
Camp Lockett, Campo, CA 91906	FUDs	Inactive, Needs evaluation as of 7/31/2018	Diesel, Explosives (UXO, MEC), Gasoline, Munitions debris (MD), Total Petroleum Hydrocarbons (TPH)	Soil
Campo Little League 976 Sheridan Road, Campo, CA 91906	LUST	Open	Diesel, Gasoline	Soil and Groundwater
Source: GeoTracker 2019, Envirostor 2019. Notes: Additional sites were identified in Geotracker (2019) and Envirostor (2019); however, they were listed as closed or inactive.				

The Camp Lockett FUDS encompasses hundreds of acres around Campo, including the entire development boundary (Bering Sea Environmental, LLC 2016). The former Camp Lockett was used by the U.S. Army for cavalry training and border defense, then for training of troops during World War II. Training ranges were established for small arms, grenades, mortar rounds, artillery, and other weapons. The USACE designated the former Camp Lockett as FUDS eligible with project number J09CA707802. The Camp Lockett FUDS consists of four munitions response sites (MRS): MRS01 – Mortar Range No. 1, MRS02 – Rifle Range, MRS03 – Hand Grenade Range, and MRS04 – Range Complex No. 1. An MRS is an area within a FUDS property that requires some type of action (for example, an investigation or cleanup) to protect human health and the environment. The exact location and nature of the munitions is still being determined.

The development boundary within the project site is not located within a known MRS; however, due to the past history as a munitions training area and the ongoing investigations, the possibility exists that munitions could be located within the development boundary. If construction or operational activities were to encounter munitions or contamination resulting from munitions, a significant impact would occur. However, implementation of standard conditions of approval and compliance with federal, state, and local regulations would ensure the proper identification and treatment of munitions within the development boundary, which would reduce any potential impacts to less than significant. The GPU EIR discussed these regulations

under Existing Regulatory Processes and Sites with Known Hazardous Materials Issues.

Project Conditions

The following are the project conditions of approval:

- **Comply with USACE Recommendations.** Prior to the commencement of construction activities within the project, the project proponent shall contact the USACE, Los Angeles District and inform them of the proposed development. All USACE recommendations shall be implemented and could include, but are not limited to, the following:
 - Preparation of a site investigation report
 - Preparation of and compliance with a munition response plan
 - Preparation and compliance with a community health and safety plan
 - Restrictions on excavation

The Campo Little League site is located within the PSRM Planning Area. A release was identified in groundwater at the site in July 2008, after complaints by an area resident identified a strong hydrocarbon odor in the irrigation water from a well to the north of the baseball field (AECOM 2019). A groundwater sample was subsequently collected from this irrigation well and total petroleum hydrocarbon (TPH) impacts were identified. The source of the impacts was suspected to be associated either with a former fueling area and underground storage tank (UST) of unknown contents, approximately 175 feet east of the irrigation well, or two 5,000-gallon steel USTs containing gasoline, which were approximately 210 feet east-southeast of the impacted irrigation well. These USTs were removed in April 2009. Numerous environmental investigations have been conducted since the case opened on March 22, 2010.

The site is currently open and is being treated with a two-phase extraction system. If development is proposed within the Campo Little League site, significant impacts could occur for multiple reasons, including if the contamination were exposed during construction, or enclosed structures were constructed, and soil vapor was trapped. Implementation of standard conditions and compliance with applicable federal, state, and local regulations would reduce impacts to less-than-significant levels because these mitigation measures outline the required steps for construction and operational activities to minimize releases of hazardous substances. These conditions were discussed in the GPU EIR under Regulatory Framework, including County Policy I-78 for a Hazardous Materials Assessment with remediation measures.

Project Conditions

The following are the project conditions of approval:

- **DEH Review.** Prior to the commencement of construction activities within the Campo Little League site, the project proponent shall contact the County of San Diego DEH and inform them of the proposed development. All DEH recommendations shall be implemented and could include, but are not limited to, the following:
 - Prepare and comply with the Soil Management Plan:
 - Prior to the commencement of construction activities that would result in building demolition or soil disturbance, a Soil Management Plan shall be

prepared, subject to the approval of the County of San Diego. The plan shall detail excavated soil management techniques and set forth a soil sampling protocol, soil sampling objectives, and soil characterization methodology.

- In addition, the stockpile shall be constructed and managed by the contractor in accordance with federal, state, and local regulations and guidance (e.g., the *Site Assessment and Mitigation Manual*), project documents, the Soil Management Plan, the Community Health and Safety Plan, and the contractor's Stormwater Pollution Prevention Plan. Contaminated substances, hazardous substances, and/or hazardous waste stockpiles shall be removed from the site in less than 90 days from the date of starting the stockpile.
- The contractor shall manage the loading, transportation, and disposal of wastes to an appropriate treatment, disposal, or recycling facility. The contractor shall prepare waste profiles and manifests. The contractor shall be responsible for the scheduling of shipments of wastes after notice of acceptance. Hazardous wastes transportation off site for disposal shall be performed in accordance with U.S. DOT Hazardous Material Transportation regulations. Trucks carrying contaminated substances, hazardous substances, or hazardous wastes shall be enclosed such that there are no odor or dust emissions during transportation along the haul route identified in the project specifications/contractor's transportation plan.
- Prepare and comply with a Community Health and Safety Plan:
 - Prior to the commencement of construction activities that would result in building demolition or soil disturbance, a Community Health and Safety Plan shall be prepared in accordance with federal and state Occupational Safety and Health Administration Hazardous Waste Operations and Emergency Response Standards; 29 CFR 29, Section 1910.120; and 8 CCR 5192. Generally, the procedures that shall be implemented to minimize hazards during construction include, but are not limited to, the following:
 1. **Dust Monitoring.** The dust monitoring program shall be implemented by the project's environmental consultant and shall consist of the following activities.
 - Monitor for the presence of visible dust generated during earth-moving activities.
 - If dust is observed, notify the contractor and request that dust be reduced/eliminated by appropriate engineering controls (e.g., application of water via hose, water truck).
 - Use a portable monitoring instrument to measure total dust levels at the downwind perimeter of the site at an appropriate sampling frequency (e.g., every half hour or hour).
 - Document dust monitor readings, including date, time, and location of each measurement.

2. **Control Methods.** Administrative and engineering controls shall be implemented by the contractor to prevent or minimize public exposure to potential hazards created by field activities. Control methods to reduce public access, prevent or minimize dust, and reduce noise and other physical hazards shall be used. If other contamination hazards are observed by the contractor during the course of work, the project's environmental consultant shall be notified and appropriate assessment performed.
3. **Emergency Planning.** In the event of an emergency or unauthorized release of a hazardous substance or waste, the contractor shall immediately notify its Site Health and Safety Officer, who is the individual with the authority and knowledge necessary to implement the site safety and health plan and verify compliance with applicable safety and health requirements, and inform them of the health and/or environmental risk. These individuals have the knowledge and integrated authorities to cease any activity or condition contributing to the hazard.

Although hazardous materials sites are located within and surrounding the development boundary, the project would not create a significant hazard to the public or the environment because standard conditions would be implemented, and the project would be required to comply with numerous federal, state, and local regulations.

As previously discussed, the GPU EIR determined impacts from transport, use and disposal of hazardous materials and accidental release of hazardous materials to be less than significant. The proposed Project would have a less-than-significant impact with standard project conditions discussed in GPU EIR under Regulatory Framework. Thus, for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 9(d) The GPU EIR concluded this impact to be less than significant with mitigation. The project site is not located within an Airport Land Use Compatibility Plan (ALUCP), or an Airport Influence Area. The closest public airport to the development boundary is Jacumba Airport, approximately 17 miles east of the project site. The project site does not fall within the Airport Influence Area identified in the Jacumba Airport ALUCP. In addition, the project does not propose construction of any structures equal to or greater than 150 feet in height, constituting a safety hazard to aircraft and/or operations from an airport or heliport. Therefore, the project would not result in a safety hazard for people residing or working in the project area.

As previously discussed, the GPU EIR determined impacts on public airports to be less than significant. As the proposed Project would have a less-than-significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 9(e) The GPU EIR concluded this impact to be less than significant with mitigation. The proposed Project is not within one mile of a private airstrip. The closest private airstrip is the Reider Ranch private airstrip located approximately 10 miles west. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

9(f)(i) OPERATIONAL AREA EMERGENCY PLAN AND MULTI-JURISDICTIONAL HAZARD MITIGATION PLAN:

The GPU EIR concluded this impact to be less than significant with mitigation. The Operational Area Emergency Plan is a comprehensive emergency plan that defines responsibilities, establishes an emergency organization, defines lines of communications, and is designed to be part of the statewide Standardized Emergency Management System. The Operational Area Emergency Plan provides guidance for emergency planning and requires subsequent plans to be established by each jurisdiction that has responsibilities in a disaster situation. The Multi-Jurisdictional Hazard Mitigation Plan includes an overview of the risk assessment process, and identifies hazards present in the jurisdiction, hazard profiles, and vulnerability assessments. The plan also identifies goals, objectives, and actions for each jurisdiction in the County, including all cities and the County unincorporated areas. Future development associated with the project will not interfere with these plans because it will not prohibit subsequent plans from being established or prevent the goals and objectives of existing plans from being carried out. The potential effects on emergency response and evacuation plans resulting from implementation of the project would be reduced to a level below significant through compliance with applicable emergency response and evacuation policies outlined in existing regulations, such as the Operational Area Emergency Plan and Multi-Jurisdictional Hazard Mitigation Plan.

9(f)(ii) SAN DIEGO COUNTY NUCLEAR POWER STATION EMERGENCY RESPONSE PLAN:

The San Diego County Nuclear Power Station Emergency Response Plan was prepared for the San Onofre Nuclear Generating Station, which is located 82 miles from the development boundary. The emergency response plan for the San Onofre Nuclear Generating Station includes an emergency planning zone within a 10-mile radius. Because the development boundary is over 10 miles from the San Onofre Nuclear Generating Station, future development associated with the project would not interfere with the emergency response plan. Therefore, no impacts would occur.

9(f)(iii) OIL SPILL CONTINGENCY ELEMENT:

The Project would not interfere with the Oil Spill Contingency Element because the project is not located along the coastal zone or coastline.

9(f)(iv) EMERGENCY WATER CONTINGENCIES ANNEX AND ENERGY SHORTAGE RESPONSE PLAN:

The project would not interfere with the Emergency Water Contingencies Annex and Energy Shortage Response Plan because the project does not propose altering major water or energy supply infrastructure, such as the California Aqueduct.

9(f)(v) DAM EVACUATION PLAN:

The Project would not interfere with the Dam Evacuation Plan because the development boundary is not located within a dam inundation zone.

As previously discussed, the GPU EIR determined impacts from emergency response and evacuation plans to be less than significant with mitigation. As the Project would have a less-than-significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR

- 9(g) The GPU EIR concluded this impact as significant and unavoidable. The development boundary is located within a County-identified Wildland Urban Interface (WUI) zone. A WUI is defined as an area where development is in proximity to open space or lands with native vegetation and habitat that are prone to brush fires. Most of the unincorporated County is within the WUI. In addition, the California Department of Forestry and Fire Protection (CAL FIRE) has mapped areas of significant fire hazards throughout the state and classifies areas with different Fire Hazard Severity Zones (FHSZ) based upon fuels, terrain, weather, and other relevant factors. The FHSZ are divided into three levels of fire hazard severity: Moderate, High, and Very High. The majority of the County is in the High and Very High FHSZ. The development boundary is located within the State Responsibility Area (SRA) Very High Fire Hazard Severity Zone (VHFHSZ).

The development boundary is also located within the Real East County Community Wildfire Protection Plan (CWPP) area, which was developed by the Real East County Safe Council. The Communities within the Fire Safe Council and CWPP consist of Jacumba Hot Springs, Boulevard, Lake Morena, La Posta, and Campo (Communities). The intent of the plan is to prioritize projects as follows:

1. Conduct brush management projects within the 100-foot defensible space zone around homes and structures on private properties.
2. Conduct, or advocate for, maintenance projects whereby fuel loads are reduced along selected routes and higher risk areas near energy infrastructure.

All future projects within the project site would be required to comply with a number of regulations and plans relating to emergency access and response, water supply, and defensible space, including the Operational Area Emergency Plan, Multi-Jurisdictional Hazard Mitigation Plan, and Consolidated Fire Code for the 16 Fire Protection Districts in San Diego County. Implementation of these fire safety standards would occur during the building permit process.

Due to the development boundary's location within a VHFHSZ, there is the potential for the project to expose people or structures to a significant risk of loss, injury, or death involving wildland fires. To reduce this, all future discretionary projects would be required to incorporate project conditions for a Fire Protection Plan (FPP). The FPP would include guidance for emergency response and evacuation in the case of a wildland fire and would be developed to be consistent with the existing Operational Area Emergency Plan and the Multi-Jurisdictional Hazard Mitigation Plan, which

provide guidance for regional emergency response, as well as the CWPP. This project condition was discussed by the GPU EIR under Regulatory Framework.

Project Conditions

The following are the project conditions of approval:

- **FPP.** A FPP shall be developed that includes, but not be limited to, the following:
 - Facility contact list
 - Contains the names, responsibilities, and contact numbers of key building contacts.
 - Building and site map
 - Evacuation map outlining the evacuation route(s) and assembly area(s) for the facility. A copy of this map is provided to emergency responders.
 - Plan for fire vehicle access routes and water tank locations.
 - Exit routes
 - Personnel roster description: Used to take attendance at the assembly area following an evacuation.
 - Site evacuation team: Responsible for complete evacuation of, and accounting for, all employees, visitors, and customers in their area of responsibility.
 - Checklist for the facility evacuation coordinator: Ensures consistency and completeness during an emergency.
 - Checklist for the floor warden: Ensures consistency and completeness during an emergency.
 - Evacuation/fire drill observation form
 - Fire Safety Plan overview: Establishes procedures for identifying fire hazards and preventing fires.

Implementation of the project condition as discussed in the GPU EIR under Regulatory Framework and compliance with the applicable regulations listed above would reduce potential impacts to less than significant. Therefore, although the project is in the VHFHSZ, construction and operation within the development boundary would not expose people or structures to a significant risk of loss, injury or death involving wildland fires.

As previously discussed, the GPU EIR determined impacts from wildland fires to be significant and unavoidable. However, the proposed Project would have a less-than-significant impact with no required mitigation for the reasons detailed above. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 9(h) The GPU EIR concluded this impact as less than significant. The project involves future development of the CLEEF entity, which would involve the development of an equestrian facility. The equestrian facility may produce or collect animal waste, which would potentially increase equestrian site user exposure to vectors, including mosquitoes, rats, or flies. Future operations within the CLEEF entity would include dry camping to support PCT hikers, thereby potentially exposing future visitors to vectors. Future development within the CLEEF entity would be required to prepare and implement a Vector Management Plan and Facility Manure Management Plan (as provided in Air Quality 3(e)), which would contain design measures and procedures to reduce potential vectors that are specific to the site. The Vector Management Plan will

be reviewed by the County Department of Environmental Health, Vector Surveillance Program. The plan must contain measures intended to reduce the potential exposure of visitors or nearby residences to flies from manure caused by the equestrian uses. The above project conditions would reduce potential project-related impacts from construction and operation to level less than significant. The project would not substantially increase current or future exposure to vectors, including mosquitoes, rats, or flies because no proposed uses on site or in the surrounding area would produce significant sources of vectors.

As previously discussed, the GPU EIR determined less than significant impacts with mitigation from vectors. However, the proposed Project would have a less-than-significant impact with project conditions discussed above. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

Conclusion

With regards to the issue area of Hazards and Hazardous Materials, the following findings can be made:

1. No peculiar impacts to the Project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. No mitigation measures contained within the GPU EIR would be required because Project specific impacts would be less than significant by adhering to the Project conditions of approval, which are consistent with the GPU EIR.

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
10. Hydrology and Water Quality – Would the Project:			
a) Violate any waste discharge requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Is the project tributary to an already impaired water body, as listed on the Clean Water Act Section 303(d) list? If so, could the project result in an increase in any pollutant for which the water body is already impaired?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Could the proposed project cause or contribute to an exceedance of applicable surface or groundwater receiving water quality objectives or degradation of beneficial uses?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
g) Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
h) Provide substantial additional sources of polluted runoff?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
i) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map, including County Floodplain Maps?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
j) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- k) Expose people or structures to a significant risk of loss, injury or death involving flooding? ☐ ☐ ☐
- l) Expose people or structures to a significant risk of loss, injury or death involving flooding as a result of the failure of a levee or dam? ☐ ☐ ☐
- m) Inundation by seiche, tsunami, or mudflow? ☐ ☐ ☐

Discussion

- 10(a) The GPU EIR concluded this impact to be significant and unavoidable. Implementation of future development projects would have the potential to generate pollutants during both the construction and operational phases. For the Project to avoid potential violations of any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality, storm water management plans would be prepared for both phases of the development Project.

During the construction phase, the Project would prepare and implement a Storm Water Pollution Prevention Plan (SWPPP). The SWPPP would implement typical erosion control BMPs such as hydraulic stabilization and hydroseeding on disturbed slopes, silt fencing, fiber rolls, gravel and sandbags, storm drain inlet protection and engineered desilting basin for sediment control. The SWPPP would be prepared in accordance with Order No. 2009-009-DWQ, National Pollutant Discharge Elimination System (NPDES) order CAS000002 Construction General Permit (CGP) adopted by the State Water Resources Control Board (SWRCB) on September 9, 2009.

In the post-construction phase, future development projects would implement site design, source control and structural BMPs to prevent potential pollutants from entering storm water runoff. The SWQMP would be prepared in accordance with the County of San Diego BMP Design Manual (2019) and SDRWQCB Order No. R9-2013-0001 Municipal Separate Storm Sewer System (MS4) permit (2013), as adopted by the RWQCB on May 8, 2013.

As previously discussed, the GPU EIR determined significant and unavoidable impacts to water quality standards and requirements. However, the proposed Project would have a less than significant impact to water quality standards with the implementation of stormwater management BMPs during construction and operation phases of future projects as described above as identified by the GPU EIR mitigation measures Hyd-1.2, Hyd-1.3 and Hyd-1.5. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 10(b) The GPU EIR concluded this impact to be significant and unavoidable. The Project lies in the Canyon City (911.82) hydrologic subarea, within the Tijuana hydrologic unit. According to the Clean Water Act Section 303(d) list, Campo Creek is impaired for Indicator Bacteria (source unknown). Cottonwood Creek is located just north of the project area, on the north side of the Carrizo Gorge Railway on the east side of SR-94, and on the north side of SR-94 from the Gaskill Bros Stone Store Museum building and to the west. Implementation of future development projects would have the

potential to contribute to release of these pollutants; however, the development projects would comply with the Watershed Protection Ordinance (WPO) and implement necessary site design measures, source control BMPs, and treatment control BMPs to prevent a significant increase of pollutants to receiving waters.

As previously discussed, the GPU EIR determined significant and unavoidable impacts to water quality standards and requirements. However, the Project would have a less than significant impact with mitigation (Hyd-1.2, Hyd-1.3 and Hyd-1.5) to water quality standards and requirements. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 10(c) The GPU EIR concluded this impact to be significant and unavoidable. Beneficial uses of Campo Creek include contact and non-contact water recreation, warm freshwater habitat, and wildlife habitat. Beneficial uses of groundwater within the Campo hydrologic area include municipal and domestic water supply, agricultural water supply, and industrial service supply. Water quality objectives for the Campo hydrologic area are as listed in the Water Quality Control Plan for the San Diego Basin. Although the GPU EIR concluded potential impacts to water quality objectives and beneficial uses be significant and unavoidable in general for overall implementation of the General Plan, implementation of BMPs and compliance with required ordinances will ensure that potential impacts of future development projects at the project site are less than significant.

As previously discussed, the GPU EIR determine significant and unavoidable impacts to water quality standards and requirements and groundwater supplies and recharge. However, the proposed Project would have a less than significant impact with mitigation to water quality standards and requirements, and groundwater supplies and recharge (Hyd-1.2, Hyd-1.3 and Hyd-1.5). Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 10(d) The GPU EIR concluded this impact to be significant and unavoidable. The project analysis includes the following: a Groundwater Investigation for the Camp Lockett Master Plan and Overlay Zone dated April 16, 2020 prepared by Jim Bennett, Water Resources Manager for San Diego County, Planning & Development Services; and a Memorandum dated October 21, 2020 also prepared by Mr. Bennett. Although anticipated development projects would obtain water supply from groundwater, the uses proposed would increase groundwater demand by only 11.7 acre-feet/year over existing water demand. The Project would not involve uses or operations that would interfere substantially with groundwater recharge. In addition, all future projects would be required to comply with the Groundwater Ordinance as identified by GPU EIR mitigation measure Hyd-2.2.

As previously discussed, the GPU EIR determined significant and unavoidable impacts to groundwater supplies and recharge. However, the proposed Project would have a less than significant impact to groundwater supply and recharge for the reasons stated above and through implementation of GPU EIR mitigation measures Hyd-1.2, Hyd-1.3, Hyd-1.5 and Hyd-2.2. Therefore, the Project would be consistent with the

analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 10(e) The GPU EIR concluded potential impacts related to substantial changes to drainage patterns that would result in erosion or sedimentation to be less than significant with mitigation. Existing drainage patterns of the project site result in stormwater runoff leading to Campo Creek downstream. Anticipated development projects within the project site would not substantially alter drainage patterns or result in substantial erosion or siltation on or off-site because as previously stated in Hydrology and Water Quality 10(a), storm water management plans would be prepared for both the construction and post-construction phases of future development projects. The SWPPP and SWQMP specify and describe the implementation process of all BMPs that would address equipment operation and materials management, prevent the erosion process from occurring, and prevent sedimentation in any onsite and downstream receiving waters. County staff would ensure that these Plans are implemented as required. In addition, the project would be required to locate future development away from ridgelines, conform to the natural topography, the Grading, Clearing and Watercourses Ordinance, and the RPO. These requirements were identified by the GPU EIR mitigation measures Hyd-3.1 through Hyd.-3.3.

As previously discussed, the GPU EIR determined significant and unavoidable impacts to erosion or siltation and less than significant impacts. However, the anticipated development projects within Camp Lockett would have a less-than-significant impact to erosion or siltation (Hyd-1.2, Hyd-1.3, Hyd-1.5, and Hyd-3.1 through Hyd-3.3). Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 10(f) The GPU EIR concluded potential impacts related to substantial changes to drainage patterns that would result in flooding on or offsite to be less than significant with mitigation. Portions of the project site are mapped as being within a 100-year County floodplain area or 100-year County floodway. The PSRM Planning Area is also adjacent to an area identified as Zone A, in FEMA FIRMette 06073C2300G. However, the development area is not location within the FEMA floodplain. The northern portion of the CLEEF Planning Area is within a 100-year County floodplain area and 100-year County floodway; the eastern and southern portions of the MESD Planning Area fall within a 100-year County floodplain area and 100-year County floodway. The MHCS Planning Area is within 0.5 mile of a FEMA 100-year floodplain, and the northeastern portion of the MHCS Planning Area falls within a 100-year floodplain. The entire MEHS Planning Area falls within a 100-year County floodplain and 100-year floodway; however, no development is proposed in this area.

Future development occurring under the project would involve construction activities that may temporarily alter drainage patterns, such as grading and trenching, which could increase the rate or amount of surface runoff in certain areas. However, these are temporary activities, and construction BMPs would be implemented as part of the project's SWPPP, in order to reduce potential impacts on drainage patterns.

The project would allow for the operation of uses within the development boundary that would potentially convert permeable surfaces to impermeable surfaces, such as

buildings and parking lots. An increase in impermeable surfaces would substantially alter the existing drainage pattern of a site or area by increasing the amount and rate of surface runoff, potentially resulting in flooding on- or off site. Additionally, impermeable surfaces and development could create a diversion from the natural runoff pattern and potentially result in flooding. However, future development within the project site would be required to comply with a number of regulations that govern the rate or amount of surface runoff such as the County BMP Design Manual and the Grading, Clearing and Watercourse Ordinance, as identified by GPU EIR in Surface Water Hydrology and mitigation measure Hyd-3.3.

The County of San Diego BMP Design Manual establishes the minimum BMP requirements applicable to all development projects, regardless of size or type. These measures include general BMP siting, source control BMPs, and site design BMPs. The County's 2013 MS4 Permit requires Copermittees impose additional requirements on those projects considered Priority Development Projects (PDPs), which are required to comply with structural BMP performance requirements specified in the BMP Design Manual. This measure was identified by the GPU EIR under Regulatory Framework. The MS4 permit requires certain PDPs to comply with hydromodification management requirements, as specified in the BMP Design Manual, which address flow duration impacts and critical sediment yield areas. The MS4 permit also requires onsite BMPs to manage hydromodification that may be caused by stormwater runoff discharged from a project. The purpose of hydromodification management requirements for PDPs is to minimize the potential of stormwater discharges to alter flow regimes, leading to flooding. PDPs subject to hydromodification management requirements must provide flow control for post-project runoff to meet the flow control performance standard.

Future projects would also be required to comply with the WPO, as identified by GPU EIR mitigation measure Hyd-1.2, which requires PDPs to implement BMPs designed to retain (i.e., intercept, store, infiltrate, evaporate, and evapotranspire) on site the pollutants contained in the volume of stormwater runoff produced from a 24-hour, 85th percentile storm event. As a result of these requirements, discretionary projects are reviewed for hydrology in a manner similar to that used for stormwater quality. Regulations require site design to account for hydrology, and drainage studies are required for projects that would significantly increase impervious surfaces. Projects are discouraged from diverting or increasing flows that cross a site, and larger projects are subject to hydromodification requirements and must develop a project-level Hydromodification Management Plan.

Therefore, compliance with existing regulations would reduce all future development impacts related to flooding on- or off site because they require implementation of ordinances designed to reduce flooding impacts.

As previously discussed, the GPU EIR determined impacts to flooding as less than significant with mitigation. The proposed Project would have a less than significant impact to flooding with the incorporation of design features and improvements and implementation of GPU EIR mitigation measures Hyd-1.2, Hyd-1.3, Hyd-1.5, and Hyd-3.3. Therefore, the Project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 10(g) The GPU EIR concluded this impact to be less than significant with mitigation. Drainage facilities—including storm drains, culverts, inlets, channels, curbs, roads, or other such structures—are designed to prevent flooding by collecting stormwater runoff and directing flows to either the natural drainage course and/or away from urban development. If drainage facilities within the development boundary are not adequately designed, built, or properly maintained, the capacity of the existing facilities can be exceeded, resulting in flooding and increased sources of polluted runoff.

Future development associated with the project could exceed the capacity of the County's existing or planned stormwater drainage facilities. Future development would have the potential to substantially alter existing drainages and hydrology or increase the amount of impermeable surfaces within the development boundary, which would increase the volume or rate of runoff. Although future development would be required to incorporate design elements such as storm drains, ditches, swales, or other means of conveying runoff, if drainage facilities are not adequate to accommodate a potential increase in stormwater flows, overflow or failure of such systems may occur, causing an exceedance in the capacity of the County's stormwater systems.

Development projects in the County must comply with the WPO in order to receive approval. This regulation requires development projects to demonstrate they have provided stormwater facilities sized appropriately to accommodate runoff flows. Additional environmental regulations related to stormwater drainage facilities and stormwater discharges include: the federal Clean Water Act (CWA), which regulates discharges of pollutants into waters of the U.S.; the California Water Code, which controls almost all considerations of water and its use; and the state's Porter-Cologne Water Quality Control Act, which controls polluted discharges into state waters. These regulations often result in alternative ways of managing stormwater runoff other than constructing new conveyance systems or drainage facilities, such as reducing impervious surfaces in site design, incorporating low-impact design (LID) techniques, and employing low-impact BMPs.

The project would be required to implement the applicable drainage and hydrology regulations; therefore, the project would not result in an impact on storm drain capacities.

As previously discussed, the GPU EIR determined impacts to exceed capacity of stormwater systems as less than significant with mitigation. With mitigation, the proposed Project would have a less-than-significant impact with regards to exceeding the capacity of stormwater systems with implementation of GPU EIR mitigation measures (Hyd-1.2, Hyd-1.3, Hyd-1.5, and Hyd-3.3). Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 10(h) The GPU EIR concluded potential impacts related to additional sources of polluted runoff to be significant and unavoidable. The project has the potential to generate pollutants; however, site design measure, source control BMPs, and treatment control BMPs as indicated in Hydrology and Water Quality 10(a) would be employed such that potential pollutants would be reduced to the maximum extend practicable.

As previously discussed, the GPU EIR determine impacts to water quality standards and requirements as significant and unavoidable. However, the proposed Project would have a less-than-significant impact to water quality standards with the implementation of project conditions listed in 10(a). GPU EIR mitigation measures Hyd-1.2, Hyd-1.3 and Hyd-1.5 would be implemented to reduce potential impacts to less than significant. Therefore, the Project would not be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 10(i) The GPU EIR concluded potential impacts related to placement of housing within a flood hazard area to be less than significant with mitigation. Although portions of the project site are mapped within a 100-year County floodplain or 100-year County floodway, anticipated development within the project site does not propose new residential development. In addition, any future development would be required to comply with the County RPO, County's Flood Damage Prevention Ordinance, the Grading, Clearing and Watercourses Ordinance, and County Policies I-68, I-45 and I-56 related to floodways as identified by GPU EIR mitigation measures Hyd-4.1 through Hyd-4.3 and Hyd-6.1.

As previously discussed, the GPU EIR determined impacts from housing within a 100-year flood hazard area as less than significant with mitigation. The project would have a less-than-significant impact for the reasons detailed above and through implementation of GPU EIR mitigation measures Hyd-4.1 through Hyd-4.3 and Hyd-6.1 on future projects. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 10(j) The GPU EIR concluded potential impacts related to placement of structures within a 100-year flood hazard area that would impede or redirect flood flows to be less than significant with mitigation. Portions of the project site are mapped as being within a 100-year County floodplain area or 100-year County floodway and future development projects could result in new or expanded structures in these areas. However, compliance with the County RPO, County's Flood Damage Prevention Ordinance, the Grading, Clearing and Watercourses Ordinance, and County Policies I-68, I-45 and I-56 related to floodways, would ensure no impacts would result from redirecting or impeding flood flows.

As previously discussed, the GPU EIR determined impacts from impeding or redirecting flood flows as less than significant with mitigation. The proposed Project would have a less than significant impact for the reasons detailed above and through implementation of GPU EIR mitigation measures as stated in 10(i) above. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 10(k) The GPU EIR concluded potential impacts related to exposing people or structures to significant risk of loss, injury or death involving flooding to be less than significant with mitigation. Although portions of the Camp Lockett site are mapped as being within a 100-year County floodplain area or 100-year County floodway, no structures are currently proposed in these areas. In addition, no residential units are proposed, and all future development projects would be required to comply with the County's Flood

Damage Prevention Ordinance, the Grading, Clearing and Watercourses Ordinance, and County Policies I-68, I-45 and I-56 related to floodways. Therefore, future development projects would not result in exposing people or structures to significant risk of loss, injury or death involving flooding.

As previously discussed, the GPU EIR determined impacts from housing within a 100-year flood hazard areas and emergency response and evacuations plans as less than significant with mitigation. The proposed Project would have a less than significant impact with the implementation of GPU EIR mitigation measures Hyd-4.1 through Hyd-4.3, and Hyd-6.1. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 10(l) The GPU EIR concluded this impact to be less than significant with mitigation. The County Office of Emergency Services maintains Dam Evacuation Plans for each dam operational area. These plans contain information concerning the physical situation, affected jurisdictions, evacuation routes, unique institutions, and event responses. If a "unique institution" is proposed, such as a hospital, school, or retirement home, within dam inundation area, an amendment to the Dam Evacuation Plan would be required. The project site is not located within a Dam Inundation Zone as identified by GPU EIR mitigation measure Hyd-8.2. Therefore, no impacts would occur as a result of a levee or dam failure.

As previously discussed, the GPU EIR determined impacts from dam inundation and flood hazards and emergency response and evacuation plans as less than significant with mitigation. The proposed Project would have a less-than-significant impact and conforms with GPU EIR mitigation measure Hyd-8.2 for reviewing potential project impacts from dam inundation hazards. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 10(m) The GPU EIR concluded this impact to be less than significant with mitigation.

- 10(m)(i) SEICHE: The Project site is not located along the shoreline of a lake or reservoir.

- 10(m)(ii) TSUNAMI: The Project site is not located in a tsunami hazard zone.

- 10(m)(iii) MUDFLOW: Mudflow is type of landslide. See response to question 7(a)(iv).

As previously discussed, the GPU EIR determined impacts from seiche, tsunami and mudflow hazards to be less than significant with mitigation. However, the proposed Project would have a less-than-significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

Conclusion

With regards to the issue area of Hydrology and Water Quality, the following findings can be made:

1. No peculiar impacts to the project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. Feasible mitigation measures contained within the GPU EIR (Hyd-1.2, Hyd-1.3, Hyd-1.5, Hyd-2.2, Hyd-3.1 through Hyd-3.3, Hyd-4.1 through Hyd-4.3, Hyd-6.1 and Hyd-8.2) would be applied to the Project. The mitigation measures, as detailed above, requires the Project applicant to comply with Watershed Protection Ordinance, Stormwater Standards Manual, Guidelines for Determining Significance for Hydrology and Water Quality.

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
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11. Land Use and Planning – Would the Project:

a) Physically divide an established community?

☐
☐
☐

b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

☐
☐
☐

Discussion

11(a) The GPU EIR concluded this impact to be less than significant with mitigation. The project is located in the southern portion of the community of Campo/Lake Morena and would be consistent with the surrounding uses. The area surrounding the development boundary is developed with a mix of agricultural and rural residential development and limited industrial development. Future development associated with the project includes expanding the existing services of museums and other community serving facilities such as parks, schools, daycare centers, and community centers within the projects site. The project does not propose the introduction of new infrastructure such as major roadways or water supply systems, or utilities to the area. Therefore, the project would not significantly disrupt or divide the established community of Campo/Lake Morena.

As previously discussed, the GPU EIR determined impacts from physically dividing an established community as less than significant with mitigation. However, the proposed Project would have a less-than-significant impact for the reasons detailed above. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 11(b) The GPU EIR concluded this impact to be less than significant. The project site is currently designated under the General Plan for the following land uses: Rural Commercial, Public/Semi-Public Facilities, Semi-Rural Residential, and Open Space-Conservation. The Project requires a Rezone for the specific Camp Lockett Master Plan and Overlay Zone and a “H” Special Area Designator due to the site’s distinction as a historic district on the Local Register and as a CHL.

All proposed uses are compatible with their respective General Plan land use designations. Most of the Master Plan area is designated as Public/Semi-Public Facilities. This designation identifies major facilities built and maintained for public use and may include privately owned facilities built and maintained for public use. Some of the uses proposed by the Camp Lockett Event Equestrian Facility (CLEEF) and all uses proposed by the San Ysidro Health (SYH), the Pacific Southwest Railway Museum, and the Motor Transport Museum are in lands designated as Public/Semi-Public Facilities and are compatible with this land use designation.

As stated above, a Rezone is required to place the specific Camp Lockett Master Plan and Overlay Zone and “H” Special Area Designator over the project site. However, the project and all future development projects would comply with the County Zoning Ordinance through the majority of development requiring subsequent discretionary permits (i.e. Site Plan, Major Use Permit) and to a lesser extent, through ministerial building permits. Further details on required future actions are provided in each chapter of the Master Plan in the following tables: Table 8: SYH Future Permits, Table 12: PSRM Future Permits, Table 16: CLEEF Future Permits, and Table 20: MTM Future Permits. MEHS is not proposing uses currently but would require future ministerial buildings permits for new fencing, signage and parking and would be subject to potential Site Plan review, or Site Plan Exemption, pursuant to Zoning Ordinance Section 5700. In addition, MEUSD is not proposing uses at this time or structures.

CLEEF is the only CLIG member proposing uses within Open Space Conservation Lands. This designation is primarily applied to large, undeveloped tracts of land typically dedicated to open space. These lands are usually owned by a jurisdiction, public agency, or conservancy group. Allowed uses include habitat preserves, passive recreation, and reservoirs. All uses proposed by the CLEEF are compatible with Open Space Conservation Lands. The property owned by the Mountain Empire Unified School District, which is not proposing uses as part of the Master Plan, is also located within the Open Space Conservation land use designation. No uses are being proposed within the Rural Commercial land use designation.

The proposed Master Plan and Overlay Zone provides development regulations and design guidelines for the project that would ensure consistency with the surrounding area and would be compatible with the Campo/Lake Morena Community Plan. For the above stated reasons, the project would not cause a significant environmental impact due to a conflict with any applicable land use plan, policy, or regulation adopted for the purposes of avoiding or mitigating an environmental effect.

As previously discussed, the GPU EIR determined impacts to conflicts with land use plans, policies, regulations as less than significant. As the Project would have a less-than significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

Conclusion

With regards to the issue area of Land Use and Planning, the following findings can be made:

1. No peculiar impacts to the Project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. No mitigation measures contained within the GPU EIR would be required because Project specific impacts would be less than significant. Therefore, the Project would not result in an impact which was not adequately evaluated by the GPU EIR.

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
12. Mineral Resources – Would the Project:			
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
12(a) The GPU EIR determined that impacts to mineral resources would be significant and unavoidable. The California Surface Mining and Reclamation Act (SMARA) required classification of land into Mineral Resource Zones (MRZs); however, the project site has not been classified by the California Department of Conservation – Division of Mines and Geology as the site does not lay within the Western San Diego Production-Consumption Region. However, the Project site contains existing residential, commercial, and public service land uses which are incompatible to future extraction of any mineral resources that may be present within the project site. In addition, implementation of the project will place a Special Area Regulation H (Historic) on all project parcels due to the site's distinction as a historic district on the Local Register (Camp Lockett Historic District) and as a CHL. Finally, the project site lies too distant from market areas for construction aggregates to be of value to the region. Therefore, implementation of the Project will not result in the loss of availability of a known mineral resource that would be of value to the region or residents of the state.			

As previously discussed, the GPU EIR determined impacts to mineral resources to be significant and unavoidable. As the proposed Project would have a less-than-significant impact for the reasons described above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 12(b) The GPU EIR concluded this impact to be significant and unavoidable. However, the Camp Lockett site is not located in a locally-important mineral resource recovery site that has been delineated on a local general plan, specific plan or other land use plan. Therefore, no potentially significant loss of availability of a known mineral resource of locally important mineral resource recovery (extraction) site delineated on a local general plan, specific plan or other land use plan will occur as a result of this project. The Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

Conclusion

With regards to the issue area of Mineral Resources, the following findings can be made:

1. No peculiar impacts to the Project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. The GPU EIR concluded significant and unavoidable impacts to mineral resources, however, the Project would have less than significant impacts for the reasons detailed above. Therefore, the Project would not result in an impact which was not adequately evaluated by the GPU EIR.

13. Noise – Would the Project:

a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

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b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

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c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?

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d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

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Significant
Project
Impact

Impact not
identified by GPU
EIR

Substantial
New
Information

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

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f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

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Discussion

13(a) The GPU EIR concluded this impact to be less than significant with mitigation. The land uses surrounding the Camp Lockett area are primarily low-density residential and open space. A residential subdivision of single-family homes is located northeast of the project site. Land uses in the central portion of Campo that are not within the project area include homes, a church, and institutional and commercial uses. The existing noise environment in the project vicinity is generally quiet. The primary sources of noise are traffic on Sheridan Road and Campo Road (State Route 94) and train operations from the Pacific Southwest Railway museum.

General Plan – Noise Element: Policy 4b addresses noise sensitive areas and requires projects to comply with a Community Noise Equivalent Level (CNEL) of 60 decibels (dBA). Projects which could produce noise in excess of 60 dB(A) are required to incorporate design measures or mitigation as necessary to comply with the Noise Element. The project would generate new vehicle trips that would add to traffic on surrounding streets and change the associated traffic noise. Table 3.1 of the Camp Lockett Master Plan/Overlay Zone Local Mobility Analysis dated August 2020 prepared by Chen Ryan, summarizes the trip generation from anticipated land uses of the proposed project. A total of 2,369 trips are anticipated to be generated daily. This increase in trips is not expected to expose onsite noise sensitive land uses (NSLU) to traffic noise levels in excess of 60 dB CNEL, nor would offsite NSLU be exposed to noise level increases in excess of 3 dB CNEL as a result of project traffic. Project traffic noise impacts are anticipated to be less than significant, and no mitigation would be required. Future development projects in Camp Lockett would be subject to discretionary permit review and approval (e.g Site Plan, Major Use Permit) and project-specific analysis of traffic noise would be conducted at that time as required by GPU EIR mitigation measure Noi-1.1. This required mitigation is listed below as **Acoustical Analysis**.

Noise Ordinance – Section 36-404, Operational Noise

Individual uses within the project site represent a mix of existing uses, reuse of existing facilities, and new uses as listed in Table 3.1 of the Camp Lockett Master Plan/Overlay Zone Local Mobility Analysis dated August 2020 prepared by Chen Ryan. Potential noise impacts of these proposed uses are not anticipated to be significant for one or more of the following reasons:

- The use represents continuation of existing operations or reuse of a building for similar activities that would not noticeably increase existing noise levels (e.g. reusing a children's activity center as a public park or playground, or reusing a daycare as a small school, etc.).
- The use would be passive and would not include major new noise sources that would generate substantial noise levels or noise increases (e.g., caretaker accommodations, gift shops, restrooms, hiking trails, etc.).

- The use would occur within a new or existing building so that activity noise would be contained (e.g. Ferguson House and Museum, food preparation/kitchen, etc.)
- The use would occur at large distances (hundreds of feet or more) from the closest offsite NSLU, such that any noise from day-to-day sources such as parking lots or heating, ventilation, and cooling (HVAC) equipment would be negligible at offsite NLSUs.
- Modest visitor levels during typical days of operations, such as 10 to 15 visitors per day to the CLEEF.

Some uses identified in the project description might be more likely to represent more substantial noise sources. These noise sources include:

- Equestrian events at the CLEEF planning area which include amplified public address (PA) systems and would be attended by larger-than-typical crowds.
- An event space at the CLEEF planning area.
- New overnight accommodations at the CLEEF and PSRM planning areas (barracks, tent camping, and/or dry camping).
- New tracks and rail operations (caboose rides) at the PSRM planning area.
- A new well and pump house at the MHCS planning area.

Future development projects in Camp Lockett would be subject to discretionary permit review and approval (e.g Site Plan, Major Use Permit) and project-specific analysis of operational noise would be conducted at that time to ensure noise levels do not exceed noise ordinance limits. Future projects would be required to comply with GPU EIR mitigation measure Noi-1.1 and GPU Policy N-4.7.

Project Mitigation

The following is the project mitigation measures:

- **Acoustical Analysis:** Require an acoustical analysis whenever a new development may result in any existing or future noise sensitive land uses being subject to on-site noise levels of 60 dBA (CNEL) or greater, or other land uses that may result in noise levels exceeding the “Acceptable” standard in the Noise Compatibility Guidelines (Table N-1 in the Noise Element).
- **Railway Jurisdictional Coordination:** As consistent with Policy N-4.7, require any new railroad operations to work with the San Diego Association of Governments (SANDAG), Caltrans, Metropolitan System (MTS), California High-Speed Rail Authority, and passenger and freight train operators as appropriate to install noise attenuation features to minimize impacts to adjacent residential or other noise sensitive uses from railroad operations.

Noise Ordinance – Section 36-410, Construction Noise

Project construction will occur only during the permitted hours of 7:00 a.m. to 7:00 p.m. pursuant to Section 36.409 of the County of San Diego municipal code. Although short term noise levels at nearby NSLU would increase relative to existing ambient, project construction will not generate construction noise in excess of the County’s standard of 75 dBA (A-weighted decibels) 8-hour L_{eq} (equivalent sound level). To ensure this future discretionary review of proposed land uses would implement GPU EIR mitigation measure

Noi-4.1 to ensure any noise reduction measures are required. Therefore, construction noise impacts would be less than significant.

Project Mitigation

The following is the project mitigation measure:

- **Hours of Construction:** All future construction projects are required to comply with the Noise Ordinance and Section 6300 of the Zoning Ordinance, as necessary, to ensure appropriate restrictions for intermittent, short-term, or other nuisance noise sources.

As previously discussed, the GPU EIR determined impacts to excessive noise levels as less than significant with mitigation. As the proposed Project would have a less-than-significant impact through implementation of GPU Policy N-4.7 and the GPU EIR mitigation measures Noi-1.1 and Noi-4.1, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 13(b) The GPU EIR concluded potential impacts related to groundborne vibration or noise to be less than significant with mitigation. The project does not propose any residential uses which are sensitive to low ambient vibration; however, proposed uses may include additional railway use of the Carrizo Gorge Railway. Future development projects in Camp Lockett would be subject to discretionary permit review and approval (e.g Site Plan, Major Use Permit) and project-specific analysis of groundborne vibration or groundborne noise would be conducted at that time to ensure noise levels are not significant. Future discretionary projects would be required to comply with the mitigation measures **Acoustical Analysis** and **Railway Jurisdictional Coordination** listed in Noise 13(a), and GPU Policy N-3.1.

Project Mitigation

The following is the project mitigation measure:

- **Groundborne Vibration:** As consistent with Policy N-3.1, use the Federal Transit Administration and Federal Railroad Administration Guidelines, where appropriate, to limit the extent of exposure that sensitive uses may have to groundborne vibration from trains, construction equipment, and other sources.

As previously discussed, the GPU EIR determined impacts to excessive groundborne vibration as less than significant with mitigation. As the project would result in a less-than-significant impact with mitigation identified by GPU Policy N-3.1, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 13(c) The GPU EIR concluded potential impacts related to permanent increases in noise levels to remain significant even with mitigation. As indicated in the response listed under Noise 13(a), the project would not expose existing or planned noise sensitive areas in the vicinity to a substantial permanent increase in noise levels that exceed the allowable limits of any applicable noise standards. Also, the project is not expected to expose existing or planned noise sensitive areas to noise 10 dB CNEL over existing ambient noise levels. Future development projects in Camp Lockett would be subject to discretionary permit review and approval (e.g Site Plan, Major Use Permit) and project-specific analysis of operational noise would be conducted at that time to ensure noise levels do not exceed noise ordinance limits. Future discretionary projects would be required to submit an **Acoustical Analysis**, as required by GPU EIR mitigation measures Noi-1.1.

As previously discussed, the GPU EIR determined impacts to permanent increase in ambient noise levels as less than significant with mitigation. As the proposed Project would have a less-than-significant impact with implementation of GPU EIR mitigation measure Noi-1.1, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 13(d) The GPU EIR concluded impacts related to substantial temporary or periodic increases in ambient noise levels in the project vicinity above levels existing without the project to be less than significant with mitigation.

The project does not involve any operational uses that are anticipated to create substantial temporary or periodic increases in ambient noise levels in the project vicinity. Also, the project will not operate construction equipment in excess of 75 dB for more than 8 hours during a 24 hour period. Future development projects in Camp Lockett would be subject to discretionary permit review and approval (e.g Major Use Permit) and project-specific analysis of operational noise would be conducted at that time to ensure noise levels do not exceed noise ordinance limits. This mitigation was identified by the GPU EIR as mitigation measure Noi-1.1, listed in Noise 13(a).

As previously discussed, the GPU EIR determined impacts to temporary or permanent increase in ambient noise levels as less than significant with mitigation. As the proposed Project would have a less-than-significant impact for the reasons detailed above and with implementation of GPU EIR mitigation measures listed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 13(e) The GPU EIR concluded impacts related to excessive noise levels from proximity to a public airport or public use airport, would to be less than significant with mitigation. The project is not located within an Airport Land Use Compatibility Plan (ALUCP) for airports or within 2 miles of a public airport or public use airport. The closest airport is Jacumba Airport, which is approximately 17 miles to the east. In addition, the project would not change the operations at any airport or airstrip and would not alter the aircraft noise exposure at any existing NSLUs. As such, the project implementation would not expose people residing or working in the project area to excessive aircraft noise levels and there would be no impact.

As previously discussed, the GPU EIR determined impacts from excessive noise exposure from a public or private airport as less than significant with mitigation. As the proposed Project would have a less-than-significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 13(f) The GPU EIR concluded impacts related to excessive noise levels from proximity to a private airstrip would be less than significant with mitigation. The project is not located within a one-mile vicinity of a private airstrip. The closest airport is Jacumba Airport, which is approximately 17 miles to the east.

As previously discussed, the GPU EIR determined impacts from excessive noise exposure from a public or private airport as less than significant with mitigation. As the proposed Project would have a less-than-significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

Conclusion

With regards to the issue area of Noise, the following findings can be made:

1. No peculiar impacts to the Project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. Feasible mitigation measures and policies contained within the GPU and the GPU EIR (Noi-1.1, Noi-4.1 and Policies N-3.1, N-4.7) would be applied to the project. The mitigation measures, as detailed above, requires the project applicant to submit an acoustical analysis, coordinate with other railway jurisdictions, comply with the hours of construction in the Zoning Ordinance and Noise Ordinance, as well as comply with the Federal Transit Administration and Federal Railroad Administration Guidelines for groundborne vibration.

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
14. Population and Housing – Would the Project:			
a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion

- 14(a) The GPU EIR concluded this impact to be less than significant. The project would result in the future development of the Camp Lockett site to provide additional recreational and commercial opportunities, and amenities for the existing and planned population. Therefore, the project would not induce substantial unplanned population growth in the project area. New development in proposed within the project site, not requiring further expansion into the County's natural and rural areas. The site is currently subject to the following General Plan land use designations: Public/Semi-Public Facilities (P/SP), Rural Commercial, Semi-Rural Residential, Rural Residential, and Open Space-Conservation (OS-C) Land Use Designations. The regulatory change does not increase density or intensity of land use that would be inconsistent with the General Plan. As the proposed Project would have a less-than-significant impact for the reasons detailed above, the

Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 14(b) The GPU EIR concluded this impact to be less than significant. The Project does not propose the demolition of any residential structures and thus would not displace substantial numbers of existing housing. Existing housing located within the project site would remain and construction of replacement housing elsewhere would not be necessary. As such, the project would not displace a substantial number of existing housing.

As previously discussed, the GPU EIR determined impacts from displacement of housing to be less than significant. As the proposed Project would have a less-than-significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 14(c) The GPU EIR concluded this impact to be less than significant. The Project does not propose the demolition of any residential structures and thus would not displace a substantial number of people. As such, replacement housing would not be required elsewhere.

As previously discussed, the GPU EIR determined impacts from displacement of people to be less than significant. As the proposed Project would have a less-than-significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

Conclusion

With regards to the issue area of Population and Housing, the following findings can be made:

1. No peculiar impacts to the Project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. No mitigation measures contained within the GPU EIR would be required because Project specific impacts would be less than significant. Therefore, the Project would not result in an impact which was not adequately evaluated by the GPU EIR.

Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
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15. Public Services – Would the Project:

a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance service ratios for fire protection, police protection, schools, parks, or other public facilities?

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Discussion

15(a) The GPU EIR concluded this impact to be less than significant with mitigation with the exception of school services, which remained significant and unavoidable. Existing fire protection services within the Master Plan and Overlay Zone area are provided by San Diego County Fire Station 46 Campo, located adjacent to the PSRM and MHCS entities. Police protection services within the Master Plan and Overlay Zone area, are provided by San Diego County Sheriff's Department (SDSD). The Campo Substation is located within the Master Plan Overlay Zone at 378 Sheridan Road.

School services are provided by Mountain Empire Unified School District (MEUSD), which encompasses over 660 square miles and includes: two Pre-K through 8th grade elementary schools; two Pre-K through 5th grade elementary schools; two 6th through 8th grade middle schools, including Camp Lockett Middle School (with an enrollment of 109 students) located approximately 0.3 mile west of the PSRM development boundary, at 31360 Highway 94, Campo CA; one high school; and an Alternative Education Program and Transition Program. Cottonwood Community Day School is located approximately 8 miles north of the development boundary and has a current enrollment of five students.

Library services are provided by the Campo-Morena Village Library branch of the San Diego County Public Library, located 0.5 mile north of the Master Plan and Overlay Zone area. The project does not propose the construction of new library facilities. Therefore, the Master Plan and Overlay Zone would not have an adverse physical effect on the environment because the project does not require new or significantly altered library facilities to be constructed.

Future discretionary projects that would occur in the Camp Lockett Masterplan area would be required to undergo a review process in which County Fire Authority staff would issue a fire service availability form before the development project can be approved to ensure adequate fire protection services are available.

Service availability forms would be provided to indicate existing services are available to the project from the following agencies/districts: San Diego County Fire Authority, the SDSD, and the MEUSD. Service availability forms are required by Board Policy I-84 and is implemented by GPU EIR mitigation measure Pub-1.5. It is not anticipated that the construction of new or physically altered governmental facilities including, but

not limited to, fire protection facilities, sheriff facilities, or libraries or parks in order to maintain acceptable service ratios, response times, or other performance service ratios or objectives for any public services will be required. Therefore, the project would not have an adverse physical effect on the environment because the project does not require new or significantly altered services or facilities to be constructed.

Future development projects in Camp Lockett would be subject to discretionary permit review and approval (e.g. Site Plan, Major Use Permit) and project-specific analysis of public services would be conducted and include the review of service availability forms as required by GPU EIR mitigation measure Pub-1.5.

Based on the discussion above, the Project is not anticipated to result in the need for significantly altered services or facilities. As previously discussed, the GPU EIR determined impact to fire protection services, police protection services and other public services as significant with mitigation while school services remained significant and unavoidable. However, as the Project would have a less-than-significant impact for the reasons stated above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

Conclusion

With regards to the issue area of Public Services, the following findings can be made:

1. No peculiar impacts to the Project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. No mitigation measures contained within the GPU EIR would be required because Project specific impacts would be less than significant. Therefore, the Project would not result in an impact which was not adequately evaluated by the GPU EIR.

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
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16. Recreation – Would the Project:

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

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

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Discussion

16(a) The GPU EIR concluded this impact to be less than significant with mitigation. Existing recreational facilities within the project area include the PCT—which travels through portions of the Master Plan and Overlay Zone area and the development boundary—and the Campo Stone Store County Park north of the development boundary, adjacent to the Gaskill Stone Brothers Store within the MEHS entity. Lake Morena, located approximately 5.8 miles northwest of the project area, is the closest regional park to the development boundary.

The project includes renovation and development within the project site to support local tourism within the Master Plan and Overlay Zone. Development would include the construction of exhibits and additional community amenities and educational programs intended to attract additional visitors to the project site. Additional visitors and residents within the development boundary would increase the use of existing neighborhood and regional parks or other recreational facilities. To avoid substantial physical deterioration of local recreation facilities the project will be required to pay fees or dedicate land for local parks to the County pursuant to the Park Land Dedication Ordinance (PLDO). The PLDO is the mechanism that enables the funding or dedication of local parkland in the County and establishes several methods by which developers may satisfy their park requirements. Options include the payment of park fees, the dedication of a public park, the provision of private recreational facilities, or a combination of these methods. PLDO funds must be used for the acquisition, planning, and development of local parkland and recreation facilities. Local parks are intended to serve the recreational needs of the communities in which they are located. Future development within the project site would be required to pay park fees. The GPU EIR identified this requirement under existing Regulatory Process.

Project Condition

The following is the project's condition of approval:

- **Payment into the PLDO:** All future projects shall pay a fee at the building counter to pay into the PLDO as required by the PLDO.

Additionally, the project includes the development of recreational facilities within the CLEEF facility, including a replica obstacle course, a perimeter walking/jogging trail around the perimeter of the CLEEF entity, and camping facilities to accommodate PCT hikers and additional visitors. The project includes the adaptive reuse of existing buildings within the MTM entity to expand operations for community gatherings and recreational opportunities.

Therefore, through development of additional recreational facilities and compliance with the requirements set forth by the PLDO for adequate parkland dedication, no impacts to local or regional recreational facilities would occur due to the project.

As previously discussed, the GPU EIR determined impacts related to deterioration of parks and recreational facilities to be less than significant. As the proposed Project would have a less-than-significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 16(b) The GPU EIR concluded this impact to be less than significant with mitigation. The project involves expanding recreational opportunities through development of an equestrian facility, camping facilities, and recreational facilities within the project site. The facilities include exhibit stalls, a picnic area with tables, four caretaker residences, a perimeter hiking trail, an event space, a replica obstacle course, restroom and concession facilities, and dry camping. However, the expanded facilities would not have an adverse physical effect on the environment because all associated impacts from the proposed recreation facilities would be mitigated to a level below significance.

As previously discussed, the GPU EIR determined impacts related to construction of new recreational facilities to be less than significant. As the proposed Project would have a less-than-significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

Conclusion

With regards to the issue area of Recreation, the following findings can be made:

1. No peculiar impacts to the Project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. No mitigation measures contained within the GPU EIR would be required because Project specific impacts would be less than significant. Therefore, the Project would not result in an impact which was not adequately evaluated by the GPU EIR.

Significant
Project
Impact

Impact not
identified by
GPU EIR

Substantial
New
Information

17. Transportation and Traffic – Would the Project:

a) Conflict with an applicable plan, ordinance or policy establishing measures of the effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths and mass transit?

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b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

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c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

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

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e) Result in inadequate emergency access?

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f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

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A *Transportation Impact Study* and a *Local Mobility Analysis* were prepared for the project by Chen Ryan, August 2020. Since these studies were prepared, the project description has slightly changed to remove previously proposed residential components within the SYH planning area. The removed residential uses include the following: Senior and Veteran Housing Area; Affordable Housing (duplex, triplex); Veteran Legacy Village; and Mixed Use Residential. Because these use types were removed, the analysis provided within these studies is considered conservative.

Discussion

17(a) The GPU EIR concluded this impact to be significant and unavoidable. The County of San Diego Guidelines for Determining Significance for Traffic and Transportation (Guidelines) establish measures of effectiveness for the performance of the circulation system. These Guidelines incorporate standards from the County of San Diego Public Road Standards, Mobility Element, and the Transportation Impact Fee Program.

Impacts on the circulation system, including transit, roadway, bicycle, and pedestrian facilities could occur if the proposed project would conflict with the programs, plans, ordinances, or policies related to these facilities. Generally, policies in San Diego County General Plan Mobility Element (2011) focus on creating efficient and interconnected public road networks within community planning areas, maintaining the rural character of rural areas, accommodating emergency vehicles, and improving/increasing availability of alternative modes of transportation, such as pedestrian, bicycle, and transit facilities.

During construction activities, construction vehicles would use the roadways that surround the project site to deliver materials and haul construction debris. Roadway users could experience temporary delays during material deliveries, but these delays would be both brief and infrequent. Therefore, they would not affect overall traffic circulation in the vicinity of the project. In addition, construction staging generally would not affect traffic operations on adjacent roadways or the use of bicycle, pedestrian, or transit facilities. Construction activities would not impede non-motorized travel or public transit in the vicinity of the proposed project.

Moreover, the proposed project would not interfere with or remove any transit, bicycle, or pedestrian facilities. The project area does not currently have many pedestrian, bicycle, or transit facilities and, while the project may involve the addition of new lanes or other changes to roadways, including any roadways identified in the County's Mobility Element, the project also aims to improve traffic safety, reduce vehicle miles traveled (VMT), and expand opportunities for the construction of future trails and increasing connections with regional trails (see the goals and policies identified under the project description). Therefore, the proposed project would not conflict with a program, plan, ordinance or policy addressing the circulation system.

As previously discussed, the GPU EIR determined significant and unavoidable impacts to unincorporated County traffic and LOS standards. The Project would have a less than significant impact for the reasons stated above. Therefore, the project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 17(b) The GPU EIR concluded this impact to be significant and unavoidable. The designated congestion management agency for the County is the San Diego Association of governments (SANDAG). In October 2009, the San Diego region elected to be exempt from the State CMP and, since this decision, SANDAG has been abiding by 23 CFR 450.320 to ensure the region's continued compliance with the federal congestion management process.

Section 15064.3 of the CEQA Guidelines details new regulations, effective statewide July 1, 2020 that sets forth specific considerations for evaluations a project's transportation impacts. Generally, vehicle miles traveled (VMT) is the most appropriate measure of transportation impacts. VMT refers to the amount and distance of automobile travel attributable to a project. Other relevant considerations may include the effects of the project on transit and non-motorized travel. Except as provided regarding roadway capacity, a project's effect on automobile delay shall not constitute a significant environmental impact.

The San Diego County Board of Supervisors adopted the County of San Diego Transportation Study Guidelines (County TSG) on June 24, 2020. The recently adopted County TSG is consistent with the CEQA guidelines and utilized VMT as a metric for evaluation transportation-related impacts. Per the County TSG, all projects within the Unincorporated portions of San Diego County are required to go through a screening process to determine the level of transportation analysis that is required.

A Transportation Impact Study (TIS) was prepared by Chen Ryan Associates, dated July 1, 2020. As part of the TIS, a screening analysis was conducted for the proposed project using the County TSG screening criteria. Based on Section 3.3 of the County TSG, when conducting a screening analysis, projects that can be classified as any of the following screening criteria would have a less than significant VMT impact due to project's characteristic and/or location and are therefore exempt from additional VMT CEQA analysis:

- Projects Located in VMT Efficient Area – A VMT efficient area is any area with an average VMT per Resident, VMT per Employee, or VMT per Service Population 15% below the baseline average for the San Diego region.
- Small Residential and Employment Projects – Projects generating less than 110 daily trips.
- Projects Located in a Transit Accessible Area – Projects located within a half mile of an existing major transit stop or an existing stop along a high-quality transit corridor.
- Locally Serving Retail/Service Projects – Local serving retail/service projects less than 50,000 square feet.
- Locally Serving Public Facilities and Other Uses – Public facilities that serve the surrounding community or public facilities that are passive use.
- Redevelopment Projects with Greater VMT Efficiency – Total project VMT is less than the existing land use's total VMT.
- Affordable Housing – Housing project where 100% of units are affordable.

Projects that do not meet the screening criteria are required to conduct a VMT analysis using either the County's screening map or the SANDAG Regional Transportation Model to determine whether the project is below the threshold established in the County TSG. The screening analysis was completed for each entity individually and addressed all features presented in the Camp Lockett Master Plan/Overlay Zone Overlay Zone Exhibits. The results of the screening level analysis are presented in Table 7 below.

Table 7. Screening Analysis Results

Feature	Screening Results	Quantity	Trip Rate	ADT
Camp Lockett Event & Equestrian Facility				
1. Existing Historic Ferguson House		N/A - Existing Use		
2. Existing Caretaker Accommodations		N/A - Existing Use		
3. Existing Warm Up Arena		N/A - Existing Use		
4. Existing Horse Trailer Parking		N/A - Existing Use		
5. Existing Gymkhana Events Arena		N/A - Existing Use		
6. Existing Broadcast Booth		N/A - Existing Use		
7. Existing Roping and Rodeo Arena		N/A - Existing Use		
8. Existing Vendor Display Area		N/A - Existing Use		
9. Existing Well and Pump House		N/A - Existing Use		
10. Existing Electrical Panel		N/A - Existing Use		
11. Proposed Additional Caretaker Accommodations	Locally serving public facilities and other uses	4 dwelling units	8 trips / dwelling unit	32
12. Proposed Food Preparation/Kitchen (Permits Required)		N/A – Additional Feature of Existing Park		
13. Existing Automobile Parking		N/A - Existing Use		
14. Proposed Cultural Exhibit Stalls		N/A – Additional Feature of Existing Park		
15. Existing Water Storage Tank		N/A - Existing Use		
16. Proposed Barracks/Restrooms (Accessory Use)		N/A – Non-Trip Generating		
17. Existing Bleachers		N/A - Existing Use		
18. Proposed Replica Obstacle Course		N/A – Additional Feature of Existing Park		
19. Proposed Perimeter Hiking Trail (Accessory Use with Private Improvement Plan or Grading Permit)		N/A – Additional Feature of Existing Park		
20. Existing Tent Camping for Pacific Crest Trail		N/A - Existing Use		
21. Existing Obstacle Course		N/A - Existing Use		
22. Existing Arena		N/A - Existing Use		
23. Proposed Event Space (Permits Required)		N/A – Additional Feature of Existing Park		
24. Proposed Dry Camping	Locally serving public facilities and other uses	8 campsites	4 trips / campsite	32
25. Proposed Parking		N/A – Non-Trip Generating		
26. Proposed Picnic Area with Tables		N/A – Additional Feature of Existing Park		

Feature	Screening Results	Quantity	Trip Rate	ADT
27. Existing Outhouse	N/A – Existing Use			
28. Proposed Fenced Dog Run (DEH Permits May Be Required)	N/A – Additional Feature of Existing Park			
29. Proposed Septic	N/A – Non-Trip Generating			
30. Proposed Electric/Water – No Sewer	N/A – Non-Trip Generating			
31. Existing Horseshoe Pits	N/A - Existing Use			
32. Proposed Fencing	N/A – Non-Trip Generating			
33. Existing Equipment Yard	N/A - Existing Use			
34. Existing Dry Camping	N/A - Existing Use			
San Ysidro Health				
1. Proposed Reuse Central Administration and Purchasing Area	Locally serving retail/service projects	2,175 SF	14 trips / KSF	31
2. Proposed Reuse MHCS Facility Maintenance Center	Locally serving public facilities and other uses	2,372 SF	5 trips / KSF	12
3. Proposed Reuse Proposed Reuse Joint-Use Dining Hall, Special Events, Food, and Nutrition Center	N/A – Existing service moving to a smaller facility			
4. Proposed Reuse Homemaker Thrift Store	Locally serving retail/service projects	4,510 SF	40 trips / KSF	181
5. Proposed Reuse Laundromat	Locally serving retail/service projects	1,295 SF	40 trips / KSF	52
6. Proposed Reuse Drug/Alcohol Services	Locally serving public facilities and other uses	8,142 SF	14 trips / KSF	114
7. Proposed Reuse Wellness Center	Locally serving public facilities and other uses	8,267 SF	30 trips / KSF	249
8. Proposed Reuse Theater	Locally serving retail/service projects	3,780 SF	80 trips / KSF	303
9. Proposed Reuse Staff Cottages/Rental Housing	N/A – Existing Use; buildings to be renovated			
10. Existing Daycare	N/A - Existing Use			
11. Proposed Reuse Pool	Locally serving public facilities and other uses	12,000 SF	50 trips / acre	14
12. Proposed Reuse Children's Activity Center	N/A – Programmatic offerings to support existing daycare space (11. Existing Daycare)			
13. Proposed Open Space	N/A – Non-Trip Generating			
14. Proposed Parking	N/A – Non-Trip Generating			
15. Proposed Well and Pump House	N/A – Non-Trip Generating			
16. Proposed Solar	N/A – Non-Trip Generating			
Motor Transport Museum				
1. Proposed Exhibit	Locally serving public facilities and other uses	30,360 SF	3.5 trips / SF	107
2. Existing Parking	N/A - Existing Use			

Feature	Screening Results	Quantity	Trip Rate	ADT
3. Proposed Realignment of Fences to Property Line	N/A – Non-Trip Generating			
4. Proposed Joint Use Parking with MHCS and Pedestrian Access to MTM	N/A – Non-Trip Generating			
Pacific Southwest Railroad Museum				
1. Existing Storage	N/A - Existing Use			
2. Existing Library/Theater	N/A - Existing Use			
3. Proposed Campgrounds	Locally serving public facilities and other uses	20 campsites	4 trips / campsite	80
4. Existing Covered Train	N/A - Existing Use			
5. Existing Shops	N/A - Existing Use			
6. Existing Campo Depot	N/A - Existing Use			
7. Proposed Mine Exhibit	Locally serving public facilities and other uses	1 exhibit	52 trips / exhibit ¹	52
8. Proposed Retail	Locally serving retail/service projects	0.5 acres	250 trips / acre	125
9. Proposed Caboose	N/A – Non-Trip Generating			
10. Proposed Mini Depot	Locally serving public facilities and other uses	1 exhibit	52 trips / exhibit ¹	52
11. Proposed Exhibit	Locally serving public facilities and other uses	3 exhibits	52 trips / exhibit ¹	156
12. Proposed Parking	N/A – Non-Trip Generating			
13. Proposed Interpretive Signage Along Sheridan Road	N/A – Non-Trip Generating			
14. Proposed Small Railroad or Shuttle to Connect PSRM to Chafee Park	N/A – Non-Trip Generating			
15. Proposed Entry Signage	N/A – Non-Trip Generating			
16. Proposed MEHS Parking	N/A – Non-Trip Generating			
Pacific Southwest Railroad Museum / Mountain Empire Historical Society				
1. Proposed Mitigation Land	N/A – Non-Trip Generating			
2. Proposed Fence Along Railroad	N/A – Non-Trip Generating			
3. Proposed Approach Sign ¼ Mile	N/A – Non-Trip Generating			
4. Proposed Traffic Calming Warning Signs	N/A – Non-Trip Generating			
5. Proposed Entrance Signarch	N/A – Non-Trip Generating			
6. Proposed Secondary Direction Sign	N/A – Non-Trip Generating			
7. Proposed MEHS Parking	N/A – Non-Trip Generating			
8. Proposed Advanced Railroad Crossing	N/A – Non-Trip Generating			
9. Existing Gaskill Stone Brothers Store	N/A - Existing Use			

Based on the analysis results provided in the above table and pursuant to Section 3.3 of the County TSG, the proposed project is presumed to have a less than significant VMT impact and no additional transportation analysis is required.

17(c) The GPU EIR concluded this impact to be less than significant with mitigation. The Project site is not located within an Airport Influence Area, Airport Safety Zone, Airport Land Use Compatibility Plan Area, Avigation Easement, or Overflight Area. Therefore, the Project would have a less than significant impact to air traffic patterns. The Project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

17(d) The GPU EIR concluded this impact to be significant and unavoidable. The proposed project would not alter traffic patterns, roadway design, place incompatible uses (e.g., farm equipment) on existing roadways, or create or place curves, slopes or walls that would impede adequate sight distance on any roadways. Additionally, no new roadways are proposed that could include sharp curves or dangerous intersections and any new roads or expansions to existing roads would be constructed according to the County's Road Standards (2012), which would ensure that no hazardous design features would occur and that traffic generated by the various proposed uses could be accommodated.

As previously discussed, the GPU EIR determined impacts on rural road safety to be significant and unavoidable. However, the Project would have a less-than-significant impact for the reasons detailed above. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

17(e) The GPU EIR concluded this impact to be less than significant with mitigation. The proposed project will not result in inadequate emergency access. The project is not served by a dead-end road that exceeds the maximum cumulative length permitted by the San Diego County Consolidated Fire Code. In addition, consistent with GPU EIR mitigation measure Tra-4.2, all future development would implement the Building and Fire codes to ensure emergency vehicle accessibility.

As previously discussed, the GPU EIR determined impacts on emergency access as less than significant with mitigation. As the Project would have a less-than-significant impact for the reasons detailed above and is consistent with GPU EIR Mitigation Measure Tra-4.2, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR..

17(f) The GPU EIR concluded this impact to be less than significant with mitigation. The Project would not result in the construction of any road improvements or new road design features that would interfere with the provision of public transit, bicycle or pedestrian facilities. In addition, the Project does not generate sufficient travel demand to increase demand for transit, pedestrian or bicycle facilities.

As previously discussed, the GPU EIR determined impacts on alternative transportation and rural safety as less than significant with mitigation. As the proposed Project would have a less-than-significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

Conclusion

With regards to the issue area of Transportation and Traffic, the following findings can be made

1. No peculiar impacts to the Project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. No mitigation measures contained within the GPU EIR would be required because Project specific impacts would be less than significant. Therefore, the Project would not result in an impact which was not adequately evaluated by the GPU EIR.

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
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18. Utilities and Service Systems – Would the Project:

- | | | | |
|--|--------------------------|--------------------------|--------------------------|
| a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| e) Result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| g) Comply with federal, state, and local statutes and regulations related to solid waste? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Discussion

- 18(a) The GPU EIR concluded this impact to be less than significant with mitigation. The project would discharge domestic waste to the Campo Water Maintenance District that is permitted to operate by the Regional Water Quality Control Board (RWQCB). As individual development projects are proposed, each project will need to estimate its wastewater generation based on more detailed information and demonstrate that the wastewater systems have the capacity and capabilities to service the development project. A Project facility availability form by the Campo Water Maintenance District would be required for all future projects that indicates that there is adequate capacity to serve the project.

As previously discussed, the GPU EIR determined impacts on wastewater treatment requirements to be less than significant. As the proposed Project would have a less-than-significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 18(b) The GPU EIR concluded this impact to be less than significant with mitigation. The Project does not include new or expanded water or wastewater treatment facilities. In addition, the project does not require the construction or expansion of water or wastewater treatment facilities.

Water Treatment

Pursuant to the Groundwater Investigation prepared for the Camp Lockett Master Plan and Overlay Zone dated April 16, 2020 and with update memo dated October 21, 2020, adequate water resources are available for the project from the Campo Water Maintenance District. The Campo Water Maintenance District currently provides water service to approximately 332 customers in the unincorporated community of Campo. Two separate drinking water systems are utilized: Rancho del Campo (Zone A) and Campo Hills (Zone B). Rancho del Campo supplies water to the southern portion, and Campo Hills supplies water to the northern portion of the Campo community. Zone B serves only the Campo Hills subdivision, which lies outside of the project and is not relevant to this analysis. Zone A serves the majority of the project area, excluding the southern half of the CLEEF Planning Area.

The Rancho del Campo public water system serves nearly 110 customers and has three active groundwater production wells with a total maximum pumping capacity of 240 gallons per minute (gpm). The project is proposing uses that would require an additional 11.7-acre-feet/year over the existing water demand. The system consists of two 110-foot-deep water wells, and one 180-foot-deep water well with a combined average production of 35,000 gallons per day (gpd). The treated potable water is stored in two interconnected storage tanks. The combined capacity of these storage tanks consists of more than 15 days of potable water supply. The water is distributed by approximately 70,000 linear feet (13.25 miles) of distribution pipes that are 6 to 10 inches in diameter. Based on the required water needed for the project of 11.7-acre-feet/year, the minimum groundwater in storage estimated during any give month under existing conditions with the addition of the project would be above the 50% threshold, as required by the County Guidelines for determining significance. Therefore, the project water demand would be met by the existing Rancho del Campo public water system.

The Rancho del Campo water system relies on several groundwater wells that have naturally occurring uranium, which is removed during the water treatment process. The untreated well water contains uranium and gross alpha that exceeds the EPA maximum contaminant level (20 picocuries per liter (pCi/L) for uranium; 15 pCi/L for gross alpha). For this reason, the Campo Water Maintenance District utilizes an ion exchange system that removes uranium and gross alpha from the source water prior to distribution to its customers. As required by the Safe Drinking Water Act, the Campo Water Maintenance District provides annual water quality reports to its customers. The consumer confidence report for the 2018 period (the most recent available) shows that the drinking water supplied to customers within Zone A meets all state and federal drinking water standards. Therefore, the project would also not require additional facilities, or an expansion of facilities, for water treatment purposes.

Wastewater Treatment

The Campo Water Maintenance District would also be the wastewater services provided for the project. The sewer collection system and the wastewater treatment system provide service to the Rancho Del Campo community and the adjacent 222-lot Campo Hills residential subdivision. Existing conditions annual wastewater generation for the wastewater treatment plans is estimated to be 45,000 gpd based on average daily use from 2016 through 2019.

Additional average wastewater generation for the proposed uses of the project are estimated at approximately 9,970 gpd. Combining existing average flow of 45,000 gpd with the proposed average flow of 9,970 gpd result in a combined average wastewater flow of 54,970 gpd. Due to the minimal change in capacity requirements, the Campo Water Maintenance District is expected to have adequate capacity to service the project. However, future projects are required to submit more detailed information and demonstrate the existing wastewater systems have the capacity and capabilities to service the development project. Future development projects would also be required to provide project service availability forms to the County of San Diego Building Division prior to obtaining a building permit.

As previously discussed, the GPU EIR determined impacts on wastewater treatment requirements to be less than significant. As the proposed project would have a less-than-significant impact for the reasons detailed above, the project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 18(c) The GPU EIR concluded this impact to be less than significant with mitigation. Specific development projects are not known at this time. Future development projects would be required to comply with the County BMP Design Manual and the Grading, Clearing and Watercourses Ordinance. The project has the potential to require the construction of new storm water drainage facilities or require the expansion of existing facilities. However, future development projects would be required to obtain discretionary actions (i.e. Site Plan, Major Use Permit) subject to CEQA. Any future drainage facilities would be required to be analyzed for impacts pursuant to CEQA.

As previously discussed, the GPU EIR determined impacts on sufficient stormwater drainage facilities to be less than significant. As the proposed project would have a

less-than-significant impact for the reasons detailed above, the project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 18(d) The GPU EIR concluded this impact to be significant and unavoidable. As discussed in Utilities and Service Systems 18(b), the project is within the Rancho del Campo water system, with the exception of the southern portion of the CLEEF, which lies outside the development boundary. However, the Ranch del Campo water system relies entirely upon groundwater as its source of water in its mission to provide at least 15 days of water storage for the community of Campo. Because the project is dependent upon groundwater but lies within the boundaries of a water service agency, there was no requirement to comply with the groundwater investigation requirements of the County's Groundwater Ordinance. However, the requirements to meet the 50% reduction of groundwater in storage and well interference guidelines were applicable. Therefore, a Groundwater Investigation was performed for the project area.

As analyzed in the Groundwater Investigation, existing groundwater use at the Rancho Del Campo Public Water System is approximately 33.6 acre-feet per year. The groundwater investigation included evaluation of the additional project use of 11.7 acre-feet per year for a total of 45.3. It evaluated up to 150 acre-feet per year of pumping from Rancho Del Campo Well #1 and Well #3 and continued use of up to 12.6 acre-feet per year from Rancho Del Campo Well #4.

The Groundwater Investigation concluded that the project would have a less-than-significant impact based on the water balance analysis that was conducted. The Groundwater Investigation also concluded that the project would have a less-than-significant impact on offsite well users and groundwater-dependent habitat based on the well interference/distance-drawdown analysis conducted as part of the groundwater investigation. Relative to the southern portion of the CLEEF, which lies outside the Rancho Del Campo's system, CLEEF would continue to use their private wells they own. In addition, wastewater on this site is serviced from septic tanks also within their property. In addition, and as stated in Utilities and Service Systems 18(a), all future projects would be required to provide a project facility availability form by the Campo Water Maintenance District that indicates that there is adequate water facilities capacity to serve the project. Therefore, because the project site currently has sufficient water supplies available to serve the project from existing entitlements and resources, and all future projects would be required to provide a project facility availability form prior to obtaining a building permit, no impacts would occur.

As previously discussed, the GPU EIR determined impacts to adequate water supplies be significant and unavoidable. However, the proposed Project would have a less-than-significant impact with no required mitigation for the reasons detailed above. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 18(e) The GPU EIR determined impacts to adequate wastewater facilities be less than significant with mitigation. Project entities including MEHS, SYH, MTM, and portions of the CLEEF and PSRM would rely on sewer services provided by the Campo Water Maintenance District for the disposal of wastewater. MEUSD would rely on the use of an existing septic tank. Future development implemented under the project would

result in additional demand on existing wastewater systems. Adequate wastewater treatment facilities are expected to be available to the project from the Campo Water Maintenance District. However, similar to water services, all future projects would be required to provide a project facility availability form by the Campo Water Maintenance District that indicates that there is adequate wastewater facilities capacity to service the project.

As previously discussed, the GPU EIR determined impacts to adequate wastewater facilities be less than significant with mitigation. However, the proposed Project would have a less-than-significant impact with no required mitigation for the reasons detailed above. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 18(f) The GPU EIR concluded this impact to be significant and unavoidable. Numerous federal, state, and local regulations exist to ensure adequate solid waste facilities are available. These include the Integrated Waste Management Act (AB 939) and AB 341, which regulate the management of solid waste within the state; the Non-Exclusive Solid Waste Management Agreement, which regulates waste collection in a market driven business; and the Integrated Waste Management Plan, which presents strategies to assist in the siting of solid waste disposal facilities.

Future development occurring under the project would generate solid waste. All solid waste facilities, including landfills, require solid waste facility permits to operate. In San Diego County, the County Department of Environmental Health, Local Enforcement Agency issues solid waste facility permits with concurrence from the California Integrated Waste Management Board (CIWMB) under the authority of the Public Resources Code (Sections 44001-44018) and California Code of Regulations Title 27, Division 2, Subdivision 1, Chapter 4 (Section 21440 et seq.). There are six, permitted active landfills in San Diego County with remaining capacity to serve the project. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 18(g) The GPU EIR concluded this impact to be less than significant. Future development occurring under the project would generate solid waste. All solid waste facilities, including landfills, require solid waste facility permits to operate. In San Diego County, the County Department of Environmental Health, Local Enforcement Agency issues solid waste facility permits with concurrence from the CIWMB under the authority of the Public Resources Code (Sections 44001-44018) and California Code of Regulations Title 27, Division 2, Subdivision 1, Chapter 4 (Section 21440 et seq.).

The Otay Landfill permit was issued on June 26, 2017, and the facilities are inspected monthly (CalRecycle 2019). Because the project would deposit all solid waste at this permitted solid waste facility, it would comply with federal, state, and local statutes and regulations related to solid waste and would not result in related impacts. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

Conclusion

With regards to the issue area of Utilities and Service Systems, the following findings can be made:

1. No peculiar impacts to the Project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. No mitigation measures contained within the GPU EIR would be required because Project specific impacts would be less than significant. Therefore, the Project would not result in an impact which was not adequately evaluated by the GPU EIR.

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
19. Wildfire – If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the Project:			
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts in the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Expose people or structures to significant risk, including downslopes or downstream flooding or landslides, as a result of runoff, post-fire instability, or drainage changes?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion

Wildfire was analyzed within the GPU EIR within Section 2.7, Hazards and Hazardous Materials. The guidelines for determining significance stated: the proposed General Plan Update would have a significant impact if it would expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands. In 2019, the issue of Wildfire was separated into its own section within Appendix G of the CEQA Guidelines to incorporate the four issue questions above. The GPU EIR did address these issues within the analysis; however, they were not called out as separate issue areas. Within the GPU EIR, the issue of Wildland Fires was determined to be significant and unavoidable.

- 19(a) The GPU EIR concluded this impact to be significant and unavoidable. The project site is located within the SRA VHFHSZ. However, as discussed in Hazards and Hazardous Materials 9(g), the project would not conflict with the Operational Area Emergency Plan, the Multi-Jurisdictional Hazard Mitigation Plan, the San Diego County Nuclear Power Station Emergency Response Plan, the Oil Spill Contingency Element, the Emergency Water Contingencies Annex and Energy Shortage Response Plan, or the Dam Evacuation Plan.

The Real East County Community Wildfire Protection Plan (CWPP) was developed by the Real East County Safe Council. The Communities within the Fire Safe Council and CWPP consist of Jacumba Hot Springs, Boulevard, Lake Morena, La Posta, and Campo, (Communities). The intent of the plan is to prioritize projects as follows:

1. Conduct brush management projects within the 100-foot defensible space zone around homes and structures on private properties.
2. Conduct, or advocate for maintenance projects whereby fuel loads are reduced along selected routes and higher risk areas near energy infrastructure.

Development proposed by the project would include minimum 100-foot fuel modification zones around proposed structures to comply with County fire regulations. Limited Building Zone Easements would be dedicated around these structures, as described in the County Fire Code. Any vegetation communities within these Fuel Modification Zones/Limited Building Zone Easements would be considered impacted and would be mitigated as described in Biological Resource 4(a).

In addition, FPP(s) would be prepared for future development projects, which would include guidance for emergency response and evacuation in the case of a wildland fire. The FPP(s) would be developed to be consistent with the existing Operational Area Emergency Plan and the Multi-Jurisdictional Hazard Mitigation Plan, which provide guidance for regional emergency response. Implementation of the FPP would ensure no potential impacts would occur. Therefore, although the project is in the VHFHSZ, construction and operation within the development boundary would not conflict with emergency response plans, and impacts would be less than significant. As previously stated, Wildfire was analyzed within the GPU EIR within Section 2.7, Hazards and Hazardous Materials and was determined to be significant and unavoidable. However, the proposed Project would have a less-than-significant impact with a project condition of FPP(s). Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 19(b) The GPU EIR concluded this impact to be significant and unavoidable. Development within or adjacent to areas designated as VHFHSZ and/or WUI areas has the potential to exacerbate wildfire risk, particularly if it occurs in areas with steep topography and/or prevailing winds as these conditions contribute to the spread of wildfires and make it more difficult to contain wildfires. The project site is located within a VHFHSZ, and thus a FPP is required. The conditions of the project including the climate and vegetation, make it suitable for potential wildland fires. The nearest fire station, San Diego County Fire Station 46 Campo, is located adjacent to the PSRM and SYH entities.

Future development within the development boundary would be required to implement applicable fire measures that include fire sprinklers, site inspections, premises identification, fire apparatus access, access road requirements, fire hydrants, and vegetation removal/clearance. In the County, proposed discretionary projects are required to undergo a review process in which County staff evaluates potential fire hazards using the County Guidelines for Determination of Significance and the Consolidated Fire Code. The applicable fire authority having jurisdiction is consulted on new projects, along with the San Diego County Fire Authority. In all cases, a fire service availability form must be approved for fire services before a development project can be approved. As noted above, the nearest fire station, San Diego County Fire Station 46 Campo, is located within adjacent to the PSRM and SYH entities.

In addition, future development within the development boundary would be required to comply with the regulations relating to emergency access, water supply, and defensible space specified in the County Code of Regulatory Ordinances, Title 3, Division 5, Chapter 3 and Appendix II-A of the Uniform Fire Code. The project is also required to comply with the County of San Diego Fire Service Conditions stipulated by the County Fire Services staff (i.e., County Fire Marshall) upon review and approval of the project.

The Campo/Lake Morena Community Plan includes the following policies that would reduce the potential for future development associated with the proposed Master Plan and Overlay Zone to exacerbate wildfire risk by requiring adequate law enforcement and emergency services, staffing, and equipment to ensure timely response and a safe and secure environment for residents and visitors alike:

- **Policy S-2.1.1:** Seek funding opportunities for year-round staffing of the Campo Fire Department.
- **Policy S-2.1.2:** Seek funding opportunities and sponsors to secure emergency supplies and equipment, including emergency generators and adequate and safe fuel storage.

The project would allow the general public to access exhibits, recreational facilities, and museums within the project site, and would result in an increase of visitors that may be exposed to wildfire risks. However, implementation of project conditions requiring the preparation and implementation of FPP(s) to ensure that all new development is in compliance with regulatory requirements.

Therefore, based on compliance with the County Code of Regulatory Ordinances, Title 3, Division 5, Chapter 3 and Appendix II-A of the Uniform Fire Code, through compliance with the County of San Diego Fire Service conditions, and implementation of FPPs for future discretionary projects, the project would not exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire.

As previously stated, Wildfire was analyzed within the GPU EIR within Section 2.7, Hazards and Hazardous Materials and was determined to be significant and unavoidable. However, the proposed Project would have a less-than-significant impact for the reasons detailed above. Therefore, the Project would be consistent with the

analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 19(c) The GPU EIR concluded this impact to be significant and unavoidable. The project site is within a high or very high fire severity zone; however, no installation or maintenance of associated infrastructure, such as roads, fuel breaks, or emergency water sources, power lines, or other utilities would be required for the project. Impacts would be less than significant. Therefore, the project would not include any activities related to infrastructure that would result in direct or cumulatively considerable impacts on the environment.

As previously discussed, the GPU EIR determined impacts from Wildfire to be significant and unavoidable. However, the Project would have a less-than-significant impact for the reasons detailed above. Therefore, the Project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 19(d) The GPU EIR concluded this impact to be significant and unavoidable. The project site is located in a climate and topography that is prone to wildfires, and has natural habitats of vegetation that could be a fuel source for wildfires, especially during droughts or dry periods. Wildfire risk tends to be high in locations where dense vegetation occurs on a steep slope. Post-wildfire risks associated with slopes, including mudflow or landslides, could occur when the vegetation that anchors soils to the hillside has burned, increasing the potential for mudflow or landslide in the event of heavy rains. The project site is at risk for this situation to occur and would expose more people to the risk of post-wildfire hazards, including mudflow, landslide, or other forms of slope instability. However, future development would be required to implement standard safety practices, and to be consistent with the Multi-Jurisdictional Hazard Mitigation Plan, if safety risks associated with mudflows, landslides, or other post-fire hazards would occur. Furthermore, implementation of FPP(s) and the 100-foot fuel modification zone would reduce potential impacts.

The GPU EIR concluded significant and unavoidable impacts associated with Wildfire under Section 2.7, Hazards and Hazardous Materials. However, the proposed Project would have a less-than-significant impact with for the reasons detailed above. Therefore, the Project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

Conclusion

With regards to the issue area of Wildfire, the following findings can be made:

1. No peculiar impacts to the Project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. No mitigation measures contained within the GPU EIR would be required because Project specific impacts would be less than significant by adhering to the Project conditions of approval, which are consistent with the GPU EIR.

Appendices

Appendix A – References

Appendix B – Summary of Determinations and Mitigation within the Final Environmental Impact Report, County of San Diego General Plan Update, SCH # 2002111067

Appendix A

The following is the list of Project specific technical studies used to support the Project's environmental analysis. All technical studies are available on the website here https://www.sandiegocounty.gov/content/sdc/pds/Current_Projects.html#par_title or hard copies are available at the County of San Diego Zoning Counter, 5510 Overland Avenue, Suite 110, San Diego, 92123:

Bennett, Jim; County of San Diego (October 2020), Groundwater Investigation

Chen Ryan (August 2020), Camp Lockett Master Plan/Overlay Zone Local Mobility Analysis

County of San Diego (June 2020) Biological Resources Figures

Figari, Elyssa; ICF (December 2019), Camp Lockett Cultural Landscape Technical Report, San Diego County, California

Prescott, Andrew; Chen Ryan (August 2020), Camp Lockett Master Plan/Overlay Zone – Transportation Impact Study

Yates, Tim; McGinnis, Patrick; ICF (July 2020), Cultural Resources Technical Report for the Camp Lockett Master Plan and Overlay Zone, San Diego County, California

References

For a complete list of technical studies, references, and significance guidelines used to support the analysis of the General Plan Update Final Certified Program EIR, dated August 3, 2011, please visit the County's website at:

[http://www.sdcounty.ca.gov/PDS/gpupdate/docs/BOS_Aug2011/EIR/FEIR_5.00 -
_References_2011.pdf](http://www.sdcounty.ca.gov/PDS/gpupdate/docs/BOS_Aug2011/EIR/FEIR_5.00_-_References_2011.pdf)

Appendix B

A Summary of Determinations and Mitigation within the Final Environmental Impact Report, County of San Diego General Plan Update, SCH # 2002111067 is available on the Planning and Development Services website at:

http://www.sdcounty.ca.gov/pds/gpupdate/GPU_FEIR_Summary_15183_Reference.pdf