



County of San Diego

MARK WARDLAW
DIRECTOR

PLANNING & DEVELOPMENT SERVICES
5510 OVERLAND AVENUE, SUITE 310, SAN DIEGO, CA 92123
(858) 694-2962 • Fax (858) 694-2555
www.sdcounty.ca.gov/pds

KATHLEEN A. FLANNERY
ASSISTANT DIRECTOR

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

Date: ~~September 12, 2019~~ June 25, 2020
Project Title: North County Environmental Resources
Record ID: PDS2008-3500-08-015, PDS2013-BC-13-0019; PDS2008-3910-0808012
Plan Area: Twin Oaks Community Sponsor Group
GP Designation: I-3 (High Impact Industrial)
Density: -
Zoning: M54 (Industrial)
Min. Lot Size: -
Special Area Reg.: B – Site Plan
Lot Size: -
Applicant: Arie DeJong, Hilltop Group, Inc.
807 E. Mission Rd., San Marcos, CA 92069 – (760) 744-9040
Staff Contact: ~~David Sibbet – (858) 694-3094~~ Regina Ochoa – (858) 495-5338
David.Sibbet@sdcounty.ca.gov regina.ochoa@sdcounty.ca.gov

Project Description

Location

The proposed project site is located at 25568 Mesa Rock Road and adjacent to the west side of I-15, in the Twin Oaks Community Sponsor Group Area of the North County Metropolitan Subregional Plan Area in the unincorporated County of San Diego. The project site encompasses six commonly owned separate parcels of real property identified as San Diego County Assessor Parcel Numbers (APNs) 187-100-23, 187-100-31, 187-100-33, 187-100-35, 187-100-37, and 187-100-38. Proposed recycling facilities and operations would be conducted on APN 187-100-37-00, over 0.25 miles south of Mesa Rock Road.

Site Description

The six parcels comprising the project site ownership are subject to the Semi-Rural Regional Category. The three westernmost parcels (APNs 187-100-23, -33, and -38) have a General Plan Land Use Designation of Semi-Rural Residential (SR-4), and a zoning classification of Rural Residential (RR, parcels -23 and -33) and Limited Agriculture (A70, parcel -38). These three parcels total 92.97 acres. The three easternmost parcels (-31, -35, and -37) are adjacent to the west side of I-15 and have a land Use Designation of High Impact Industrial (I-3) and zoning classification of General Impact Industrial (M54) with a “B” Special Area Designator. These parcels total 45.15 acres.

Access to the proposed recycling operations on APN 187-100-37, would be provided by a proposed improved private easement road that would traverse northerly across APNs 187-100-35, -31, -38, -23, and -33 from parcel -37 to connect with Mesa Rock Road (County Maintained) on the west side of I-15

Regional access is provided by I-15 to the Deer Springs Road exit and local access to the site is provided by a private easement road via Mesa Rock Road. Fire protection services would be provided by the Deer Springs Fire Protection District, potable water would be provided by the Vallecitos Water District, and an onsite septic system is proposed.

APN 187-100-37 currently contains a patio structure, security trailer, and various stored materials on previously disturbed areas of that parcel. This parcel also contains native habitat (e south and west sides of the parcel) and has an elevational range from 960 feet above mean sea level (amsl) in the eastern portion of the parcel to 1,200 feet in the western portion. The remaining project ownership contains native Coastal Sage Scrub habitat and three of the parcels (-23, -35, and -38) contain an existing dirt road that provides access to parcel -37.

The site contains six permitted groundwater wells; however, these wells will be destroyed under permit and inspection by the Department of Environmental Health.

Discretionary Actions

The project involves the processing of two discretionary permits: Site Plan and Boundary Adjustment/Certificate of Compliance (B/C). The Site Plan would allow for the proposed recycling facilities and activities, with the "B" Special Area Designator within the M54 zone.

The Boundary Adjustment/Certificate of Compliance between parcels 187-100-35 and 187-100-37 would provide additional buffer to residential properties located south of the project, by transferring acreage (approximately 17.5 acres) on the west (300 feet in width) and south (400 feet in width) sides of parcel -37 to parcel -35. All proposed recycling facilities and activities would be located on the reduced acreage (approximately 18 acres) of parcel -37.

Project Description

The project is a recycling facility for tree waste chipping and grinding; the recycling of wood and construction debris ("C&D wood"); and the recycling of concrete, asphalt, and inert material from demolition projects ("CDI debris"). Only pre-sorted, non-contaminated tree trimmings, wood and construction debris would be accepted for processing and there would be no composting or acceptance of solid waste. The proposed NCER facility would likely require permits for both a Medium Volume CDI facility, regulated by CCR Title 14, Division 7, Chapter 3.0, Article 5.9 Section 17383.5, and a Compostable Material Chipping and Grinding permit. NCER is anticipated to release two truckloads per day (approximately 48 tons per day, 15,000 net tons annually) of finished product. The daily maximum combined process tonnage of C&D wood debris and/or CDI debris allowed by the Local Enforcement Agency (LEA) is 174 tons. The proposed project consists of a 12,000-square foot steel recycling processing building, 100,000-gallon water tank, a security trailer, truck scales, and up to twenty (60 feet by 60 feet by 18 feet high) adjustable storage containers. The steel recycling building will be 200 feet in length by 60 feet in width with a maximum height of 37.5 feet. The building includes four overhead doors on each side, each 24 feet in width and 26 feet in height. An additional overhead door of the same dimensions is located on the south end of the building that provides access to the wash facility. The steel building will be tan in color with brown trim. The facility would operate six days a week, Monday through Saturday, from 5:00 AM to 7:00 PM. A Site Plan is required in conformance with the County Zoning Ordinance and a Habitat Loss Permit for impacts to Coastal Sage Scrub habitat is required in

conformance with the Natural Communities Conservation Planning Act. The project also includes a Boundary Adjustment between APNs 187-100-35 and 187-100-37 to buffer residential property to the south. Combined, the project site consists of six parcels totaling 139.5 gross acres (135.6 net acres). However, the proposed NCER Recycling Facilities would be constructed on the adjusted acreage (18 acres) of parcel 187-100-37 in the southeast portion of the site.

Proposed earthwork quantities for the project consist of 95,710 cubic yards of cut and 182,430 cubic yards of fill with approximately 72,360 cubic yards of imported soil required. The project would require approval of a grading plan if the Site Plan and Boundary Adjustment/Certificate of Compliance are approved. An existing security trailer, patio cover, septic system, and concrete pad will be removed during the site development and construction phase.

Grading is required to improve the private access road from Mesa Rock Road to the project parcel (APN 187-100-037), and grade pads for the proposed recycling operation. The access road begins at an elevation of 961 feet above mean sea level (amsl) at Mesa Rock Road and climbs to the south to an elevation of over 1,095 feet amsl before dropping back down to an elevation of 1,032 feet amsl at the driveway to the 12,000 square foot recycling building on the project facilities parcel. Grading and improvements for the access road will include two crib walls in two separate locations; one approximately 110 feet in length and the other approximately 180 feet in length, each having a maximum height of 10 feet. The first crib wall will have a fill slope ranging in height from 22 feet to 35 feet above it, and the second crib wall will have a fill slope ranging in height from 20 to 33 feet above it. Five pads will be created by the grading on the recycling facilities parcel, the largest of which is Pad A which will be over seven acres in area and encircled by an access road. All project operations are proposed on this pad including material storage, processing, truck scales, security trailer, and the 12,000 square foot recycling building with associated parking lot. A 100,000-gallon water tank will be located on Pad E which will be 0.13 acres in area. No operations are proposed on Pads B (0.27 acres), C (0.28 acres), or D (0.38 acres).

Overview

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 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 North County Environmental Resources Site Plan is consistent with the analysis performed for the GPU EIR. Further, the GPU EIR adequately anticipated and described the impacts of the proposed project, identified applicable mitigation measures necessary to reduce project specific impacts, and the project implements

these mitigation measures (see https://www.sandiegocounty.gov/content/dam/sdc/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 proposes operation of a recycling facility on a parcel that would be approximately 18 acres following approval of a Site Plan and Boundary Adjustment/Certification of Compliance. The Site Plan would allow for the proposed recycling facilities and activities, by implementing the Community Design Review Area “B” Special Area Designator within the General Impact Industrial (M54) zone. The proposed uses are classified as a Recycling Processing Facility, Heavy Light. The M54 zone does not specify density limitations and other applicable sections of the Zoning Ordinance do not specify any density or area restrictions; however, a “G” height designator is specified allowing for a maximum height of 35 feet and two stories. The M54 zone also specifies

a “W” building type designator allowing for one or more nonresidential detached main buildings per lot or attached nonresidential buildings on the same lot or separate lots.

The North County Metropolitan Community Plan including the I-15 Corridor Scenic Preservation Guidelines do not specify density limitations for industrial zoned properties.

The proposed project is therefore consistent with the General Impact Industrial Zoning Designation as well as the High Impact Industrial Land Use Designation of the General Plan and the certified GPU FEIR.

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.

The project site lies along I-15 and is subject to Site Plan review as it is in the I-15 design review corridor. The site also contains native habitat including Diegan Coastal Sage Scrub. Potentially significant impacts were identified related to biological resources; however, these impacts can be mitigated with measures that are consistent with those identified in the GPU FEIR and have been made conditions of approval in the project decision documents.

Specific mitigation measures are contained in the Biological Assessment Report and are consistent with mitigation measures Bio-1.5 and Bio-1.6 of the GU FEIR.

Pursuant to the above findings, the proposed project would not result in any project specific effects that area peculiar or which the GPU FEIR failed to analyze.

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

The proposed project is consistent with the use characteristics and limitations of the development considered by the GPU EIR through the application of a Site Plan and would represent a small part of the growth that was forecast for build-out of the General Plan. The GPU EIR considered the incremental impacts of the proposed 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 exemption 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. All project potential impacts have been mitigated to less than significant levels; whereas, the GPU FEIR identified many potentially significant and unmitigable impacts.

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

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

Signature **June 25, 2020**
Date

Regina Ochoa **Project Manager**
Printed Name Title

CEQA Guidelines §15183 Exemption Checklist

Overview

This checklist provides an analysis of potential environmental impacts resulting from the proposed 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) There is no substantial adverse effect on a scenic vista because views are transitory and the project lies approximately 80- feet higher in elevation than I-15 adjacent to the east side of the project site. The access road to the recycling processing area will be improved mainly along the route of an existing dirt road. Total height of the 12,000 square foot recycling processing building will be 37.5 feet but will be located at the west side of the processing pad (Pad A) further out of the line of sight from I-15 and lower lying areas. Recycling materials will be limited to 20 feet in height and will be located within the proposed circular roadway around Pad A. The facility, processing area, access road, and retaining walls will be screened by intervening topography from the south and west, some existing vegetation, and a proposed six-foot fence and landscaping. See the Visual Resources Impact Report for Hilltop Group, by TRS Consultants, dated December 2014 and Memorandum concerning the Visual Impact Analysis for the NCER Project, by Dudek, dated December 22, 2017 for additional detail.

1(b) The property is within the viewshed of the North County Metro I-15 Design Corridor. Goal A of the I-15 Corridor Subregional Plan (Appendix C to the North County Metro Subregional Plan) is in regard to Scenic Preservation - Preserve to extent possible, the scenic attributes of the I-15 corridor. Goal B concerns Land Use – provide a land use pattern sensitive to the opportunities and constraints of the I-15 corridor. Goal E applies to Conservation – Protect environmental resources along the corridor including but not limited to those contained within Resource Conservation Areas. Pad A on which the recycling facility will be located lies at an elevation ranging between 1,022 and 1,031 feet amsl while I-15, 200 feet to the east, lies at an elevation of approximately 940 feet amsl. This 80 to 90-foot elevation difference is comprised of a 30 to 70-foot slope along the freeway to the project parcel, then two crib walls on the project parcel each with a maximum height of 10 feet, followed by an additional 15 to 20 feet of fill slope, 20-foot wide bench, and 10 more feet of fill slope. Grading for the access road will occur mainly along the route of an existing dirt road; and grading for the recycling facility will occur primarily on a previously disturbed area used by Caltrans as a borrow pit decades ago. Grading on previously disturbed areas will minimize impact to scenic attributes of the site and proposed landscaping will screen proposed fill slopes, retaining walls, and the recycling processing area and facilities. The proposed project will have no impact or less than significant impact from all key views analyzed in the Visual Resources Impact Report

and will implement and be consistent with I-15 Corridor Scenic Preservation Guidelines. Therefore, the project will not substantially damage scenic resources.

- 1(c) Please see response to 1(b) above. The project does not substantially degrade the existing visual character or quality of the site and its surrounding area. The project is set back and well above I-15, proposes the facilities and access road mainly on previously disturbed areas, and will be well screened by topography, some existing vegetation, and proposed landscaping.
- 1(d) The project proposes minimal lighting for safety and security. The project site is located more than 15 miles from the Palomar Observatory and the project’s lighting will be required to conform with the County’s Light Pollution Code (Zone B) and Zoning Ordinance to prevent spillover onto adjacent properties and to minimize impacts to dark skies. Therefore, the proposed project would not adversely affect day or nighttime views in the area, which would adversely affect day or nighttime views in the area.

Conclusion

As discussed above, the project will have a less than significant impact to aesthetics/visual resources. The project will not result in an impact which was not adequately evaluated by the GPU FEIR.

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland zoned Timberland Production?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion

- 2(a) The project site and surrounding area does not contain land designated as Farmland of Statewide and Local Importance as well as unique according to the State Farmland

Mapping and Monitoring Program (FMMP). The site and surrounding area are mapped as "Other Land". The site does contain an area of Prime Soils; however, much of that area coincides with the area previously disturbed many decades ago for a borrow pit by Caltrans for construction of I-15. No agricultural production is taking place on or near the project site based on a review of current aerial photographs. Thus, the proposed project would not 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.

- 2(b) The project site is not located within or adjacent to a Williamson Act contract. The nearest agricultural contract area is located 1.4 miles to the north-northwest of the project site. Therefore, the project would not conflict with existing zoning for agricultural use or a Williamson Act contract.
- 2(c) There are no timberland production zones on or near the proposed project site.
- 2(d) The project site is not located near any forest lands. Therefore, the proposed project would not result in the loss or conversion of forest lands.
- 2(e) The project site is located adjacent to I-15 and land zoned for agricultural and rural residential use. However, the area surrounding the project site is quite rugged and contains open space with native habitats. No agricultural production is taking place on adjacent lands. The project site is not located adjacent to any properties that are considered Important Farmland or other active agricultural production areas. Therefore, the proposed project would not result in changes to the existing environment which could result in the conversion of Important Farmland or other agricultural resources to non-agricultural uses.

Conclusion

As discussed above, the project would not result in any significant impacts to agricultural resources; therefore, the project would not result in an impact which was not adequately evaluated by the GPU FEIR.

	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?
- e) Create objectionable odors affecting a substantial number of people?

Discussion

3(a) An Air Quality and Greenhouse Gas Emissions Assessment was prepared by Dudek, dated June 3, 2019. As the proposed project would be consistent with the project site’s General Plan land use designation, and because the SIP and RAQS rely on information from CARB and SANDAG including growth projections based on population, vehicle trends, and land use plans developed by the County and the cities in the County as part of the development of their general plans, the proposed land uses would be accounted for in the projections contained in the SIP and RAQS. Therefore, the proposed project would not conflict with or obstruct the implementation of local air quality plans and impacts would be less than significant. Please refer to Section 3.2.1 of the Air Quality and Greenhouse Gas Emissions Assessment prepared by Dudek, dated June 3, 2019 for additional detail.

3(b) Project construction and operational emissions associated with the development of the proposed commercial development would not exceed the County’s construction and operational significance level thresholds. Therefore, the project would not violate any air quality standard or contribute substantially to an existing or projected air quality violation. Please refer to Section 3.2.2 of the Air Quality and Greenhouse Gas Emissions Assessment prepared by Dudek, dated June 3, 2019 for additional detail.

3(c) San Diego County is presently in non-attainment for the National and California Ambient Air Quality Standard (NAAQS and CAAQS, respectively) for ozone (O₃). San Diego County is also presently in non-attainment for concentrations of Particulate Matter less than or equal to 10 microns (PM₁₀) and Particulate Matter less than or equal to 2.5 microns (PM_{2.5}) under the CAAQS. O₃ is formed when volatile organic compounds (VOCs) and oxides of nitrogen (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 PM₁₀ in both urban and rural areas include motor vehicles, wood burning stoves and fireplaces, dust from construction, landfills, agriculture, wildfires, brush/waste burning, and industrial sources of windblown dust from open lands.

The project would contribute PM₁₀, PM_{2.5}, NO_x, and VOCs emissions from construction/grading activities; however, the incremental increase would not exceed established significance level thresholds (see Question 3(b) above). Additionally, grading activities associated with construction of the project would be subject to the County of San Diego Grading Ordinance and the San Diego Air Pollution Control District (SDAPCD) Rule 55, which requires the implementation of dust control measures. the proposed project would not result in a cumulatively considerable contribution to regional O₃ concentrations or other criteria pollutant emissions. Cumulative impacts would be less than significant. Please refer to Section 3.2.3 of the Air Quality and Greenhouse Gas Emissions Assessment prepared by Dudek, dated June 3, 2019 for additional detail.

3(d) The closest receptor to the project site is a residence approximately 620 feet to the south. the project would not add trips to an intersection currently operating at LOS E or F, and would not degrade an existing intersection LOS from an acceptable level (D or better) to

LOS E or F. Therefore, impacts from CO “hotspots” would be less than significant. The greatest potential for TAC emissions during construction would be diesel particulate matter (DPM) emissions from heavy equipment operations and heavy-duty trucks, and the associated health impacts to sensitive receptors. This equipment would be subject to CARB regulations for nonroad equipment and would be used on an as-needed basis. Because of the steep terrain between the project and closest receptor and the prevailing wind direction, the TAC emissions from operation are not expected to impact the closest receptor. Therefore, TAC emissions from construction and operation are expected to be less than significant. Health impacts associated with criteria air pollutants (PM10, PM2.5, NOx, CO, O3, and VOCs) would be considered less than significant. Please refer to Section 3.2.4 of the Air Quality and Greenhouse Gas Emissions Assessment prepared by Dudek, dated June 3, 2019 for additional detail.

3(e) The NCER Recycling Facility would engage in three forms of recycling; of these forms of recycling, chipping and grinding of wood would be the primary sources of potential odor generation. The proposed project would prepare and implement an Odor Impacts Minimization Plan (OIMP) according to Title 14 California Code of Regulations Division 7, Chapter 3.1 17863.4. As specified in the California Code of Regulations, an OIMP shall include an odor monitoring protocol, identification of potential odor receptors, a description of meteorological conditions that would affect the movement of odor, a response protocol, design considerations intended to minimize odor, and a description of operation procedures intended to minimize odor. The project could produce objectionable odors during construction from paving, painting, and equipment operation; however, these substances, if present at all, would be minimal and temporary. The operation of retail and storage uses are not associated with typical odor generating uses. Subsequently, no significant air quality odor impacts are expected to affect surrounding receptors. Therefore, the proposed project would not create objectionable odors that would affect a substantial number of people. With the implementation of the required OIMP and subsequent incorporation of the above identified odor minimization best management practices (BMPs) (such BMPs would be incorporated into the OIMP), odors impacts would be less than significant. Moreover, the effects of objectionable odors are localized to the immediate surrounding area and would not contribute to a cumulatively considerable odor impact. Please refer to Section 3.2.5 of the Air Quality and Greenhouse Gas Emissions Assessment prepared by Dudek, dated June 3, 2019 for additional detail.

Conclusion

As discussed above, the project would not result in any significant impacts to air quality; therefore, the project would not result in an impact which was not adequately evaluated by the GPU FEIR.

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?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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- 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?

- 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) Biological resources on the project site were evaluated in a Biological Assessment Report prepared by BLUE Consulting, dated March 10, 2013 and additional memorandums by Dudek as listed in Appendix A. The project will impact 1.07 acres of Diegan coastal sage scrub, 9.86 acres of mafic southern mixed chaparral, 0.08 acres of coast live oak woodland and 0.17 acre of southern coast live oak riparian forest. These impacts are considered significant and will be mitigated through both onsite and offsite mitigation. The project will also need approval of a Habitat Loss Permit for impacts to Diegan coastal sage scrub. One sensitive plant species and one sensitive wildlife species were detected during field surveys: summer holly (*Comarostaphylis diversifolia ssp. diversifolia*) and red-tailed hawk (*Buteo jamaicensis*). The project will avoid impacts to the sensitive plant species and potential impacts to sensitive wildlife species will be mitigated through habitat-based mitigation (onsite and offsite mitigation).

As considered by the GPU EIR, project impacts to sensitive habitat and/or species will be mitigated through ordinance compliance and through implementation of the following mitigation measures: purchase of offsite mitigation, dedication of biological open space and a limited building zone easement, the installation of open space signage and fencing, biological monitoring and breeding season avoidance to prevent brushing, clearing, and/or grading between February 15 and August 31. The GPU EIR identified these mitigation measures as Bio 1.5 and Bio 1.6. Please see Sections 2 and 3 of the Biological Assessment Report as well as the additional memorandums by Dudek for additional discussion regarding these impacts and mitigation measures.

4(b) Based on the Biological Assessment Report, the project will impact 0.17 acre of southern coast live oak riparian forest. The project will also result in impacts to the following sensitive natural communities: Diegan coastal sage scrub, mafic southern mixed chaparral, coast live oak woodland.

As considered by the GPU EIR, project impacts to sensitive habitats will be mitigated through ordinance compliance and through implementation of the following mitigation measures: purchase of offsite mitigation, dedication of biological open space and a limited building zone easement, the installation of open space signage and fencing, biological monitoring and breeding season avoidance to prevent brushing, clearing, and/or grading between February 15 and August 31. The GPU EIR identified these mitigation measures as Bio 1.5 and Bio 1.6. Please see Section 4 of the Biological Assessment Report as well as the additional memorandums by Dudek for additional discussion regarding these impacts and mitigation measures.

- 4(c) The proposed project site does not contain wetlands or waters as defined by Section 404 of the Clean Water Act. Therefore, no impacts to these resources occur and no mitigation is required. Please see Section 5 of the Biological Assessment Report for additional discussion.
- 4(d) The project will have no significant impacts to wildlife movement or nursery sites. Therefore, no specific mitigation for impacts to Wildlife Movement or Nursery Sites is necessary. Please see Section 6 of the Biological Assessment Report as well as the additional memorandums by Dudek for additional discussion.
- 4(e) The project is consistent with the Resource Protection Ordinance (RPO), Natural Communities Conservation Planning (NCCP) Process, and Migratory Bird Treaty Act (MBTA). Appropriate mitigation is proposed for all biological resources impacts. Please see Section 7 of the Biological Assessment Report for additional discussion regarding conformance with these plans.

Conclusion

As discussed above, the project will result in potentially significant impacts to biological resources; however, all impacts are appropriately mitigated to a level less than significant. These impacts and proposed mitigation measures were anticipated and evaluated by the GPU FEIR.

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
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"/>
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"/>
c) Directly or indirectly destroy a unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Directly or indirectly destroy a unique paleontological resource or site?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

Discussion

5(a) Based on an analysis of records and a survey of the property by County approved archaeologists Micah Hale and Brian Smith, it has been determined that there are no impacts to historical resources because they do not occur within the project site. The results of the survey are provided in the cultural resources reports titled, *Negative Cultural Resources Survey Report for the North County Environmental Recycling Facility* (January 2019) prepared by Micah Hale, and *Negative Cultural Resources Survey Report – The Mesa Rock Nursery Project* (June 1, 2009) prepared by Brian F. Smith.

5(b) Based on an analysis of records and a survey of the property by County approved archaeologists Micah Hale and Brian Smith, it has been determined that there are no impacts to archaeological resources because they do not occur within the project site. The results of the survey are provided in the cultural resources reports titled, *Negative Cultural Resources Survey Report for the North County Environmental Recycling Facility* (January 2019) prepared by Micah Hale, and *Negative Cultural Resources Survey Report – The Mesa Rock Nursery Project* (June 1, 2009) prepared by Brian F. Smith. Native American monitoring (Gabe Kitchen and Clint Linton of Red Tail Monitoring and Research, Inc.) was provided during the two surveys. No issues were raised by the Native American monitors.

Native American consultation was initiated on April 3, 2015. Twenty-nine tribes and tribal organizations were contacted inquiring whether they would like to engage in Native tribal consultation. Three tribes (Pauma, Rincon, San Luis Rey) requested consultation, and copies of studies and project documents. County staff met with all three tribes. During consultation, it was identified that a tribal cultural resource (TCR) was located outside of the parcels on which the access road and recycling facility would be constructed and operate, but still within the overall 139.5-acre site ownership area. The TCR (TCR-1) was recorded and is on file with the South Coastal Information Center. One tribe requested that the applicant place the TCR within an open space easement. The TCR is located within the proposed biological resources open space proposed on the site ownership area.

Due to the disturbed nature of the project site, monitoring was not required as a condition of approval. However, as considered by the GPU EIR, potential impacts to cultural resources will be mitigated through ordinance compliance and conformance with the County’s Cultural Resource Guidelines (grading monitoring), if resources are encountered. The GPU EIR identified these mitigation measures as Cul-2.5.

5(c) 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.

5(d) A review of the County’s Paleontological Resources Maps and data on San Diego County’s geologic formations indicates that the project is located on geological formations (Cretaceous plutonic) that do not have the potential to contain unique paleontological resources.

As considered by the GPU EIR, potential impacts to paleontological resources will be mitigated through ordinance compliance and conformance with the County’s

Paleontological Resource Guidelines (grading monitoring), if resources are encountered. The GPU EIR identified these mitigation measures as Cul-3.1

- 5(e) Based on an analysis of records and archaeological surveys of the property, it has been determined that the project site does not include a formal cemetery or any archaeological resources that might contain interred human remains. The results of the survey are provided in the archaeological survey report entitled, “*Negative Cultural Resources Survey Report for the North County Environmental Recycling Facility* (January 2019) prepared by Micah Hale, and *Negative Cultural Resources Survey Report – The Mesa Rock Nursery Project* (June 1, 2009) prepared by Brian F. Smith. In addition, the project must comply with the San Diego County Grading, Clearing, and Watercourse Ordinance (Sections 87.101-87.804), CEQA Section 15064.5(d), and Section 7050.5 of the Health & Safety Code. These regulations require the suspension of grading operations should human remains or Native American artifacts be encountered.

Conclusion

The surveys conducted the project will not result in any potentially significant impacts to cultural resources. No further environmental analysis is required because:

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 FEIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU FEIR.
4. Feasible mitigation measures contained within the GPU FEIR will be applied to the project.

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
6. Geology and Soils – Would the Project:			
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving: rupture of a known earthquake fault, strong seismic ground shaking, seismic-related ground failure, liquefaction, and/or 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?

Discussion

6(a)(i) The project site is not located in a fault rupture hazard zone identified by the Alquist-Priolo Earthquake Fault Zoning Act, Special Publication 42, Revised 1997, Fault-Rupture Hazards Zones in California, or located within any other area with substantial evidence of a known fault. Therefore, the proposed project would not expose people or structures to potential adverse effects involving: rupture of a known earthquake fault, strong seismic ground shaking, seismic-related ground failure, liquefaction, and/or landslides.

6(a)(ii) To ensure the structural integrity of all buildings and structures, the proposed project must conform to the Seismic Requirements as outlined within the California Building Code. Compliance with the California Building Code and the County Building Code will ensure that the project would not result in a significant impact.

6(a)(iii) The project site is not within a “Potential Liquefaction Area” as identified in the County Guidelines for Determining Significance for Geologic Hazards. In addition, the site is not underlain by poor artificial fill or located within a floodplain.

6(a)(iv) The site is located within a “Landslide Susceptibility Area” as identified in the County Guidelines for Determining Significance for Geologic Hazards. Landslide Susceptibility Areas were developed based on landslide risk profiles included in the *Multi-Jurisdictional Hazard Mitigation Plan, San Diego, CA* (URS, 2004). Landslide risk areas from this plan were based on data including steep slopes (greater than 25%); soil series data (SANDAG based on USGS 1970s series); soil-slip susceptibility from USGS; and Landslide Hazard Zone Maps (limited to western portion of the County) developed by the California Department of Conservation, Division of Mines and Geology (DMG). Also included within Landslide Susceptibility Areas are gabbroic soils on slopes steeper than 15% in grade because these soils are slide prone. According to the Report of Geotechnical Investigation for the site dated November 1, 2012 and Addendum No. 2 to the report dated May 7, 2013, the report concluded that there is no evidence of past slope failure on site or in the historic aerial photographs reviewed. Additionally, the report concluded that cut slopes are to be cut in very dense granitic bedrock and would be stable. Therefore, impacts from landslides at the project site are considered to be less than significant.

6(b) According to the Soil Survey of San Diego County, the soils on-site are identified as Cienega very rocky coarse sandy loam, Fallbrook Sandy Loam, Placentia Sandy Loam and Ramona Sandy Loam that have a moderate soil erodibility rating. However, the project will not result in substantial soil erosion or the loss of topsoil because the project will be required to comply with the Watershed Protection Ordinance (WPO) and Grading Ordinance which will ensure that the project would not result in any unprotected erodible soils, will not alter existing drainage patterns, and will not develop steep slopes. Additionally, the project will be required to implement Best Management Practices (BMPs) as proposed in the project Stormwater Quality Management Plan (SWQMP) dated August 29, 2019 to prevent erosion and transport of sediment offsite.

6(c) The project site is not located on or near geological formations that are unstable or would potentially become unstable as a result of the project. Furthermore, the project will be

required to comply with the WPO and Grading Ordinance which will ensure that the project would not result in any unprotected erodible soils and will not develop steep slopes that could cause landslides, lateral spreading, subsidence, liquefaction, or collapse.

6(d) The project is not underlain by an expansive soils as defined within Table 18-I-B of the Uniform Building Code (1994). The soils on-site are Cieneba very rocky coarse sandy loam, 30 to 75 percent slopes and Ramona sandy loam, 9 to 15 percent slopes, eroded. These soils have a shrink-swell behavior of low and represent no substantial risks to life or property. Additionally, the project will not result in substantial risks to life or property because compliance with the Building Code and implementation of standard engineering techniques would ensure structural safety.

6(e) The project will discharge domestic wastewater to on-site wastewater systems (OSWS). The project involves the installation of two onsite wastewater treatment systems to accommodate the employees, a security trailer. The employee facilities comprise a 2,000-gallon septic tank connected to a 208-foot horizontal seepage pit with 100 percent reserve area. The security trailer/caretaker’s residence would be a 1,000-gallon septic tank connected to a 50-foot horizontal seepage pit with 100 percent reserve area. This system will require the installation of a pump system. Discharged wastewater must conform to the Regional Water Quality Control Board’s (RWQCB) applicable standards, including the Regional Basin Plan and the California Water Code. California Water Code Section 13282 allows the RWQCB to authorize a local public agency to issue permits for OSWS “to ensure that systems are adequately designed, located, sized, spaced constructed and maintained.” The RWQCB with jurisdiction over San Diego County have authorized the County of San Diego, Department of Environmental Health (DEH) to issue certain OSWS permits through the County and within the incorporated cities. DEH has reviewed the OSWS lay-out for the project pursuant to DEH, Land and Water Quality Division’s, “On-site Wastewater Systems: Permitting Process and Design Criteria.” DEH approved the project’s OSWS on April 19, 2013. Therefore, the project has soils capable of adequately supporting the use of septic tanks or alternative wastewater disposal systems as determined by the authorized, local public agency. In addition, the project will comply with the San Diego County Code of Regulatory Ordinances, Title 6, Div. 8, Chap. 3, Septic Tanks and Seepage Pits. Therefore, the project has soils capable of adequately supporting the OSWS as determined by the authorized local public agency.

Conclusion

As discussed above, the project would not result in any significant impacts to/from geology/soils; 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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7. Greenhouse Gas Emissions – Would the Project:

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"/>
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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"/>
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Discussion

7(a) The project would produce GHG emissions through construction activities, truck and vehicle trips, and operation of recycling equipment. An Air Quality and Greenhouse Gas Emissions Assessment was prepared by Dudek (2019). This assessment concluded that the proposed project's GHG emissions for both construction and operations, would not exceed 900 metric tons of carbon dioxide equivalent (MT CO₂E) per year, which the California Air Pollution Control Officers Association (CAPCOA) recommends as a "screening threshold" when evaluating whether a project would impede the State's GHG reduction goals under AB 32. (Air Quality and GHG Assessment, pp. 28-29.) Specifically, the GHG Assessment determined that the proposed project would emit 378 MT CO₂E per year, including both amortized construction emissions and annual operation emissions, well below the 900 MT CO₂E per year screening threshold. (pp. 35- 36.) In addition, the proposed project, as a facility that recycles construction debris, furthers the County's objective of intercepting construction and demolition waste, diverting it away from landfills, and converting it into repurposed materials. (See 2017 Strategic Plan to Reduce Waste, pp. 1-2, 34-35). Impacts would therefore not be significant.

In addition, although the Climate Action Plan (CAP) does not apply, the project would implement all applicable measures identified in the Climate Action Plan (CAP) Consistency Review Checklist as conditions of approval.

~~However, the project was deemed consistent with the County's Climate Action Plan (CAP) through application of the CAP Consistency Checklist and would have a less than significant impact from the generation of greenhouse gas emissions. Please see Section 4.2 of the Air Quality and Greenhouse Gas Emissions Assessment prepared by Dudek, dated June 3, 2019 for additional analysis of this issue.~~

~~The County of San Diego adopted a Climate Action Plan on February 14, 2018 which outlines actions that the County will undertake to meet its greenhouse gas (GHG) emissions reductions targets. Implementation of the CAP requires that new development projects incorporate more sustainable design standards and implement applicable reduction measures consistent with the CAP. To help streamline this review and determine consistency of proposed projects with the CAP during development review, the County has prepared a CAP Consistency Review Checklist (Checklist). The proposed project would implement all applicable measures identified in the Checklist and would therefore be consistent with the County's Climate Action Plan.~~

7(b) The project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs. The project is below the CAPCOA screening threshold and would further the County's goals of intercepting construction debris. No significant impact would occur. Although the Climate Action Plan (CAP) does not apply, the project would implement all applicable measures identified in the CAP Consistency Review Checklist as conditions of approval. ~~The project was deemed consistent with the County's Climate Action Plan (CAP) through application of the CAP Consistency Checklist.~~

Conclusion

As discussed above, the proposed project would not result in any significant or new significant impacts to greenhouse gas emissions; therefore, the project would not result in an impact which was not adequately evaluated by the GPU FEIR.

Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
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8. 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"/>
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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"/>
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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"/>
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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"/>
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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"/>
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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"/>
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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"/>
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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"/>
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Discussion

- 8(a) The project is for a recycling processing facility for tree waste chipping and grinding; the recycling of wood and construction debris (“C&D wood”); and the recycling of concrete, asphalt, and inert material from demolition projects (“CDI debris”). The project will not accept, transport, use, store, or dispose hazardous wastes or materials. All incoming loads would be checked and approved for recycling prior to being unloaded at the facility. A Hazardous Materials Program and Hazardous Load Check Program will be implemented Hazardous Materials Program and Hazardous Load Check Program to prevent these materials from coming onto the project site. Please see the Hazardous Load Check/Materials Program document for additional detail regarding implementation of this plan.

The San Diego County Department of Environmental Health Hazardous Materials Division (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. **Should** the facility propose the storage of potentially hazardous materials (such as diesel fuel) in the future, a Hazardous Materials Business Plan would be required is required to contain basic information on the location, type, quantity and health risks of hazardous materials stored or used onsite. The plan would also contain an emergency response plan which 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 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 would facilitate rapid response in the event of an accidental spill or release, thereby reducing potential adverse impacts. Furthermore, the DEH HMD would be 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, because the facility will not accept, transport, use, store, or dispose hazardous wastes or materials, and will implement a Hazardous Materials Program and Hazardous Load Check Program to prevent these materials from coming onto the project site, no impacts will occur.

- 8(b) The project is not located within one-quarter mile of an existing or proposed school. Therefore, the project will not have any effect on an existing or proposed school.
- 8(c) Based on a regulatory database search, the project site has not been subject to a release of hazardous substances. The project site is not included in any of the following lists or databases: the State of California Hazardous Waste and Substances sites list compiled pursuant to Government Code Section 65962.5., the San Diego County Hazardous Materials Establishment database, the San Diego County DEH Site Assessment and Mitigation (SAM) Case Listing, the Department of Toxic Substances Control (DTSC) Site Mitigation and Brownfields Reuse Program Database (“CalSites” Envirostor Database), the Resource Conservation and Recovery Information System (RCRIS) listing, the EPA’s Superfund CERCLIS database or the EPA’s National Priorities List (NPL). Additionally, the project does not propose structures for human occupancy or significant linear excavation within 1,000 feet of an open, abandoned, or closed landfill, is not located on or within 250 feet of the boundary of a parcel identified as containing burn ash (from the

historic burning of trash), is not on or within 1,000 feet of a Formerly Used Defense Site (FUDS), does not contain a leaking Underground Storage Tank, and is not located on a site with the potential for contamination from historic uses such as intensive agriculture, industrial uses, a gas station or vehicle repair shop. Therefore, the project would not create a significant hazard to the public or environment.

- 8(d) The proposed project is not located within an Airport Land Use Compatibility Plan (ALUCP), an Airport Influence Area, or a Federal Aviation Administration Height Notification Surface. Also, the project does not propose construction of any structure equal to or greater than 150 feet in height, constituting a safety hazard to aircraft and/or operations from an airport or heliport. Therefore, the project will not constitute a safety hazard for people residing or working in the project area.
- 8(e) The proposed project is not within one mile of a private airstrip. Therefore, the proposed project would not result in a safety hazard for people residing or working in the project area.
- 8(f)(i) OPERATIONAL AREA EMERGENCY PLAN AND MULTI-JURISDICTIONAL HAZARD MITIGATION PLAN: The Operational Area Emergency Plan is a comprehensive emergency plan that defines responsibilities, establishes an emergency organization, defines lines of communications, and is designed to be part of the statewide Standardized Emergency Management System. The Operational Area Emergency Plan provides guidance for emergency planning and requires subsequent plans to be established by each jurisdiction that has responsibilities in a disaster situation. The Multi-Jurisdictional Hazard Mitigation Plan includes an overview of the risk assessment process, identifies hazards present in the jurisdiction, hazard profiles, and vulnerability assessments. The plan also identifies goals, objectives and actions for each jurisdiction in the County of San Diego, including all cities and the County unincorporated areas. The project will not interfere with this plan because it will not prohibit subsequent plans from being established or prevent the goals and objectives of existing plans from being carried out.
- 8(f)(ii) SAN DIEGO COUNTY NUCLEAR POWER STATION EMERGENCY RESPONSE PLAN: The San Diego County Nuclear Power Station Emergency Response Plan will not be interfered with by the project due to the location of the project, plant and the specific requirements of the plan. The emergency plan for the San Onofre Nuclear Generating Station includes an emergency planning zone within a 10-mile radius. All land area within 10 miles of the plant is not within the jurisdiction of the unincorporated County and as such a project in the unincorporated area is not expected to interfere with any response or evacuation.
- 8(f)(iii) OIL SPILL CONTINGENCY ELEMENT: The project is not located along the coastal zone.
- 8(f)(iv) EMERGENCY WATER CONTINGENCIES ANNEX AND ENERGY SHORTAGE RESPONSE PLAN: The Emergency Water Contingencies Annex and Energy Shortage Response Plan will not be interfered with because the project does not propose altering major water or energy supply infrastructure, such as the California Aqueduct.
- 8f)(v) DAM EVACUATION PLAN: The project is not located within a dam inundation zone.
- 8(g) The proposed project is adjacent to wildlands that have the potential to support wildland fires. However, the project will not expose people or structures to a significant risk of loss, injury or death involving wildland fires because the project does not propose residential development; however, it will comply with applicable regulations (California Fire Code

Article 86) relating to emergency access, water supply, and defensible space specified in the Consolidated Fire Code for the 16 Fire Protection Districts in San Diego County for an industrial project of this nature. Implementation of these fire safety standards will occur during construction and operation of the recycling facility. Also, the Deer Springs Fire Protection District has reviewed and accepted the Fire Protection Plan-Short Form dated November 27, 2012 that describes how the project will comply with Article 86 and the Consolidated Fire Code. Therefore, based on the review of the project by Deer Springs fire Protection District, through compliance with Article 86 and the Consolidated Fire Code, the project is not anticipated to expose people or structures to a significant risk of loss, injury or death involving hazardous wildland fires. Moreover, the project will not contribute to a cumulatively considerable impact, because all past, present and future projects in the surrounding area are required to comply with the Consolidated Fire Code.

8(h) The project includes bioretention areas for stormwater runoff to comply with State and local stormwater regulations; however, these facilities must be designed so that no standing water occurs for a period over 72 hours. The facility does not propose any other uses that would allow water to stand for a period of 72 hours (3 days) or more (e.g. artificial lakes, agricultural irrigation ponds). Also, the project proposes a recycling processing facility for tree waste chipping and grinding; the recycling of wood and construction debris (“C&D wood”); and the recycling of concrete, asphalt, and inert material from demolition projects (“CDI debris”). The project will implement an Integrated Pest Management Plan as described in the Integrated Pest Management Report for the project. The facility will not produce or collect animal waste or solid waste. Therefore, the project will not substantially increase exposure to vectors, including mosquitoes, rats or flies.

Conclusion

As discussed above, the proposed project would not result in any significant impacts to/from hazards/hazardous materials; therefore, the project would not result in an impact which was not adequately evaluated by the GPU FEIR.

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
9. 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	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

would not support existing land uses or planned uses for which permits have been granted)?

- 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?
- 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?
- g) Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems?
- h) Provide substantial additional sources of polluted runoff?
- 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?
- j) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?
- 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

9(a) The project will require a National Pollutant Discharge Elimination System (NPDES) General Permit for Discharges of Storm Water Associated with Construction Activities. A Priority Development Project Stormwater Quality Management Plan (SWQMP) was prepared for the project by Excel Engineering dated August 29, 2019. The SWQMP demonstrates that the project would comply with all requirements of the Watershed Protection Ordinance (WPO). The project will be required to implement site design measures, source control BMPs, and/or structural BMPs to reduce potential pollutants and address hydromodification impacts to the maximum extent practicable. These measures will enable the project to meet waste discharge requirements as required by the San Diego Municipal Permit, as implemented by the San Diego County Jurisdictional Runoff Management Program (JRMP) and BMP Design Manual, 2019.

In addition to WPO compliance this facility is subject to compliance with the Industrial Storm Water Permit with the CA State Water Resources Control Board (SWRCB) and is required to file a Notice of Intent (NOI) and develop and implement a Storm Water Pollution Prevention Plan (SWPPP) prior to occupancy

- 9(b) The project lies in the Escondido (904.62) hydrologic subarea within the Carlsbad hydrologic unit. According to the Clean Water Act Section 303(d) list, a portion of these watersheds are impaired. Constituents of concern in the Escondido watershed include pesticides, fecal indicator bacteria, metals, other inorganics, nutrients, salinity and toxicity. The project could contribute to release of these pollutants; however, the project will comply with the WPO and implement site design measures, source control BMPs, and structural BMPs to prevent a significant increase of pollutants to receiving waters.
- 9(c) As stated in responses 9(a) and 9(b) above, implementation of BMPs and compliance with required ordinances will ensure that project impacts are less than significant.
- 9(d) The project would obtain its water supply from the Vallecitos Water District that obtains water from surface reservoirs or other imported sources. The project would not use any groundwater. In addition, the project does not involve operations that would interfere substantially with groundwater recharge.
- 9(e) A Drainage Study was prepared by Excel Engineering dated August 29, 2019 for the proposed project. It was determined that the proposed project would not substantially alter the existing drainage pattern of the project site or area. As outlined in the project's SWQMP, the project will implement source control and/or structural BMP's to reduce potential pollutants, including sediment from erosion or siltation, to the maximum extent practicable from entering storm water runoff.
- 9(f) The Drainage Study determined that the proposed project would not alter the existing drainage pattern in a manner which would result in flooding on- or off-site. The proposed project would convey drainage to natural drainage channels. The project would not significantly alter established drainage patterns or substantially increase the amount of runoff in a manner which would result in flooding on- or off-site.
- 9(g) The project proposes to convey drainage to natural drainage channels. Therefore, the project does not propose to create or contribute runoff water that would exceed the capacity of existing or planned storm water drainage systems.
- 9(h) The project has the potential to generate pollutants; however, site design measures, source control BMPs, and structural BMPs will be employed such that potential pollutants will be reduced to the maximum extent practicable.
- 9(i) The proposed project is for an industrial recycling processing facility. No structures would be placed within a 100-year flood hazard area.
- 9(j) No 100-year flood hazard areas were identified on the project site or off-site improvement locations. Therefore, no structures would be placed within a 100-year flood hazard area which would impede or redirect flood flows.
- 9(k) The project site lies outside any identified special flood hazard area. Additionally, the FEMA FIRM indicates that the project is located in a Zone X, which is an area of minimal flooding.

9(l) The project site lies outside a mapped dam inundation area for a major dam/reservoir within San Diego County. In addition, the project is not located immediately downstream of a minor dam that could potentially flood the property.

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

9(m)(ii) TSUNAMI: The project site is not located in a tsunami hazard zone.

9(m)(iii) MUDFLOW: Mudflow is type of landslide. See response to question 6(a)(iv).

Conclusion

As discussed above, the project would not result in any significant impacts to/from hydrology/water quality; therefore, the project would not result in an impact which was not adequately evaluated by the GPU FEIR. Please see the Drainage Study and Stormwater Quality Management Plan for additional details regarding those analyses.

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
10. Land Use and Planning – Would the Project:			
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion

10(a) The project does not propose the introduction of new infrastructure such as major roadways, water supply systems, or utilities to the area that would physically divide the existing community. Additionally, build-out of this site was anticipated in the GPU EIR and GPU EIR mitigation measures Lan-1.1 through Lan-1.3 requiring coordination efforts to ensure that development of the site would not divide an established community.

10(b) The proposed project is subject to the General Plan Semi-Rural Regional Category and contains lands within the High Impact Industrial (I-3) Land Use Designation. The project is also subject to the policies of the North County Metro Subregional Plan. The property is zoned M54 which permits light and heavy recycling processing facilities pursuant to the Zoning Ordinance Section 6975. The project is consistent with applicable policies of the General Plan, the North County Metro Subregional Plan, and the I-15 Design Review Guidelines. The project would not conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect, including policies of the General Plan and Community Plan.

Conclusion

As discussed above, the project would not result in any significant impacts to land use/planning; 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
11. 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"/>
11(a) The project site has been classified by the California Department of Conservation Division of Mines and Geology as “Resources Potentially Present” (MRZ-3). However, the project site has land uses to the south including single-family residences which could be incompatible to future extraction of mineral resources on the project site. A future mining operation at the project site would need to undergo complete environmental review for potential impacts to neighboring properties for issues such as noise, air quality, traffic, and possibly other impacts. Furthermore, the proposed project does not proposed a land use that would prevent a proposal for mineral extraction sometime in the future. Therefore, implementation of the project will not result in the loss of availability of a known mineral resource that would be of value since the mineral resource would not be locked up by the proposed project indefinitely.			
11(b) The project site is not located in an Extractive Use Zone (S-82), nor does it have an Impact Sensitive Land Use Designation (24) with an Extractive Land Use Overlay (25). Therefore, the proposed project would not result in the loss of a locally-important mineral resource recovery site.			

Conclusion

As discussed above, the project would not result in any significant impacts to mineral resources; 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. 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

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?

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?

Discussion

12(a) The project is a light recycling processing facility to handle green waste, construction, and demolition waste. Based on a Noise Analysis prepared by LDN Consulting dated May 21, 2013 and the Supplemental Noise Report by Dudek dated May 21, 2019, the project will not expose people or noise sensitive land uses to potentially significant noise levels that exceed the allowable limits of the County of San Diego General Plan, County of San Diego Noise Ordinance, and other applicable standards for the following reasons:

General Plan – Existing transportation noise sources near the project site include Mesa Rock Road and Interstate 15 (I-15). Mesa Rock Road is classified as a 2.2E Light Collector by the County’s Mobility Element. I-15 is not a County Mobility Element road. The proposed project is a light recycling industrial facility and is not a sensitive receptor to noise impacts. The existing sensitive receptors to noise impacts from the proposed recycling industrial facility would include housing to the east and south of the project site. Based on the Traffic Study, the increase in ADT (110 passenger car equivalent) to Mesa Rock Road by the proposed project would not constitute a substantial increase to noise levels that would result in off-site impacts to the existing residences. Moreover, the proposed recycling facility is consistent with the existing General Plan Land Use Designation. The project related traffic contributions to nearby roadways would not result in significant off-site noise impacts that would exceed the allowable limits of the County of San Diego General Plan, Noise Element.

Noise Ordinance – Section 36.404: The project is a light recycling industrial facility. Primary non-transportation noise sources from the project site during operation would include a Wheel Loader, C & D Crusher, Tub Grinder, Trommel Screen, and dump trucks. Due to distance of the operating equipment from the property lines of sensitive receptors, and intervening topography, the resultant noise level at property line would comply with County noise standards.

Noise Ordinance – Section 36-409: Based on the Noise Analysis prepared by LDN Consulting, Inc. May 21, 2013 and Supplemental Noise Report by Dudek dated May 21, 2019, noise from grading and construction activities would include haul trucks, water trucks, graders, dozers, loaders and scrapers which can reach relatively high levels. However, the project would not generate construction noise in excess of Noise Ordinance standards. The County Noise Ordinance, Section 36.409, allows an eight-hour average 75 dBA sound level limit at the boundary of an occupied structure for the operations of construction equipment. At an average distance of 150-feet, noise level and grading

activities are not anticipated to exceed 75 dBA. The proposed project anticipates an average distance of more than 300-feet from adjacent property lines with the activities to be spread out over the project site. Additionally, construction and grading operations will occur only during permitted hours of operation. The nearest existing residence is located over 1,500 feet to the east. Based on noise attenuation by distance and shielding by intervening topography temporary construction operations would comply with County noise standards. The primary noise source associated with temporary construction operations are from rock crushing activities and would require a minimum set back of 225 feet from any occupied residential property line. The temporary rock crushing activities would generate levels not exceeding the 75 dBA requirement due to the shielding from intervening topography and distance to sensitive receptors. The project demonstrates Noise Ordinance compliance and conformance to the Noise Element. No noise mitigation is required.

12(b) The proposed project is not a sensitive receptor to groundborne noise or vibration, nor does the project propose any major, new, or expanded infrastructure such as mass transit, highways, major roadways or intensive extractive industry that could generate excessive groundborne vibration or groundborne noise levels. Therefore, the project will not expose persons to or generate excessive groundborne vibration or groundborne noise levels on a project or cumulative level.

12(c) As indicated in the response listed under Section 12(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 direct or cumulative noise impacts over existing ambient noise levels.

12(d) The project involves the following permanent noise sources that may increase the ambient noise level: Vehicular traffic on nearby roadways and recycling machinery and equipment. 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 the County of San Diego General Plan, County of San Diego Noise Ordinance, and other applicable local, State, and Federal noise control. Impacts would be less than significant.

The project does not involve any operational uses that may create substantial temporary or periodic increases in ambient noise levels in the project vicinity. Also, consistent with GPU EIR mitigation measure Noi-4.1, the project must comply with the Noise Ordinance; general construction noise is not expected to exceed the construction noise limits of the Noise Ordinance. Construction operations will occur only during permitted hours of operation. Also, the project will not operate construction equipment in excess of 75 dB for more than eight hours during a 24-hour period.

12(e) The project is not located within an Airport Land Use Compatibility Plan (ALUCP) for airports or within two miles of a public airport or public use airport.

12(f) The project is not located within a one-mile vicinity of a private airstrip.

Conclusion

As discussed above, the project would not result in any significant impacts to/from noise; 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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13. 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"/>
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b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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Discussion

13(a) The proposed project will not induce substantial population growth in the area because the project does not propose any physical or regulatory change that would remove a restriction to or encourage population growth in an area including, but limited to the following: new or extended infrastructure or public facilities; new commercial facilities; large-scale residential development; accelerated conversion of homes to commercial or multi-family use; or regulatory changes including General Plan amendments, specific plan amendments, zone reclassifications, sewer or water annexations; or LAFCO annexation actions. Therefore, the proposed project would not induce substantial population growth in the area.

13(b) The property currently has an unoccupied trailer, which is to remain as a security trailer for the recycling facility. This project would not displace any amount of existing housing.

13(c) The property currently has an unoccupied trailer, which is to remain as a security trailer for the recycling facility. Therefore, this project would not displace a substantial number of people.

Conclusion

As discussed above, the project would result in less than significant impacts to populations/housing; 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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14. 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,

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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response times or other performance service ratios for fire protection, police protection, schools, parks, or other public facilities?

Discussion

14(a) The project does not include construction of new or altered governmental facilities. The proposed industrial development is consistent with the General Plan projections and Land Use Map, therefore, service ratios for public services associated with the project were analyzed within the GPU EIR and the project is generally not anticipated to require additional services.

Conclusion

As concluded above, the project would not result in any significant impacts to public services; therefore, the project would not result in an impact which was not adequately evaluated by the GPU EIR.

15. 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?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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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?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
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Discussion

15(a) The project does not propose any residential use that may increase the use of existing neighborhood and regional parks or other recreational facilities in the vicinity.

15(b) The project does not include recreational facilities or require the construction or expansion of recreational facilities. Therefore, the construction or expansion of recreational facilities cannot have an adverse physical effect on the environment.

Conclusion

As discussed above, the project would not result in any significant impacts to recreation; therefore, the project would not result in an impact which was not adequately evaluated by the GPU EIR.

16. Transportation and Traffic – Would the Project:

a) Conflict with an applicable plan, ordinance or policy establishing measures of the effectiveness for the

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
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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?

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

Discussion

16(a) Level of Service (LOS) is a professional industry standard by which the operating conditions of a given roadway segment or intersection is measured. Level of Service is defined on a scale of A to F; where LOS A represents the best operating conditions and LOS F represents the worst operating conditions. LOS A facilities are characterized as having free flowing traffic conditions with no restrictions on maneuvering or operating speeds; traffic volumes are low and travel speeds are high. LOS F facilities are characterized as having forced flow with many stoppages and low operating speeds.

A Preliminary Traffic Assessment was prepared by RBF, May 6, 2013. The proposed project would result in an additional 110 passenger car equivalent (PCE) average daily trips (ADTs) to roadways in the project area. All project intersection and road segment level of service were projected to operate at a LOS D or better. Since the project falls below the threshold for needing a traffic study and the total ADT of the study roadway segments are within the capacity thresholds for acceptable levels of service, a traffic report is not necessary for this project. The addition of project traffic by does not exceed the significant thresholds established by the County’s Guidelines for Determining Significance and would not result in any significant direct impacts. The project will be subject to the payment of Traffic Impact Fees associated with the forecast project daily trip generation which will address cumulative impacts that may occur in the vicinity of the project site. The proposed project would not conflict with an applicable plan, ordinance, or policy establishing measures of the effectiveness for the performance of the circulation system. In addition, the project would

not conflict with policies related to non-motorized travel such as mass transit, pedestrian or bicycle facilities.

- 16(b) The additional 110 PCE ADTs from the proposed project do not exceed the 2400 trips (or 200 peak hour trips) required for study under the region’s Congestion Management Program as developed by SANDAG. The project would not conflict with an applicable congestion management program or other standards established by the County Congestion Management agency for designated roads or highways.
- 16(c) The proposed project is located outside of an Airport Influence Area and is not located within two miles of a public or public use airport. Therefore, the project would not result in a change in air traffic patterns that results in substantial safety risks.
- 16(d) The proposed project will not alter traffic patterns, roadway design, place incompatible uses (e.g., farm equipment) on existing roadways, or create curves, slopes or walls which would impede adequate sight distance on a road. The Preliminary Traffic Assessment provided an analysis of sight distance and determined the proposed access road and associated driveway will provide sufficient corner sight distance north and south, which exceed the County requirement. Therefore, the project access will meet County of San Diego Corner Sight Distance requirements.
- 16(e) The Deer Springs Fire Protection District has reviewed the project and its Fire Protection Plan-Short Form and have determined that there is adequate emergency fire access.
- 16(f) The project will 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.

Conclusion

As discussed above, the project would not result in any significant impacts to transportation/traffic; therefore, the project would not result in an impact which was not adequately evaluated by the GPU FEIR. Please see the Preliminary Traffic Assessment for additional evaluation of this subject.

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
17. 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?
- 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?
- f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?
- g) Comply with federal, state, and local statutes and regulations related to solid waste?

Discussion

- 17(a) The project will discharge domestic wastewater to on-site wastewater systems (OSWS). The project involves the installation of two onsite wastewater treatment systems to accommodate the employees, a security trailer. The employee facilities comprise a 2,000-gallon septic tank connected to a 208-foot horizontal seepage pit with 100 percent reserve area. The security trailer/caretaker's residence would be a 1,000-gallon septic tank connected to a 50-foot horizontal seepage pit with 100 percent reserve area. This system will require the installation of a pump system. Discharged wastewater must conform to the Regional Water Quality Control Board's (RWQCB) applicable standards, including the Regional Basin Plan and the California Water Code. California Water Code Section 13282 allows the RWQCB to authorize a local public agency to issue permits for OSWS "to ensure that systems are adequately designed, located, sized, spaced constructed and maintained." The RWQCB with jurisdiction over San Diego County have authorized the County of San Diego, Department of Environmental Health (DEH) to issue certain OSWS permits through the County and within the incorporated cities. DEH has reviewed the OSWS lay-out for the project pursuant to DEH, Land and Water Quality Division's, "On-site Wastewater Systems: Permitting Process and Design Criteria." DEH approved the project's OSWS on April 19, 2013. Therefore, the project has soils capable of adequately supporting the use of septic tanks or alternative wastewater disposal systems as determined by the authorized, local public agency. In addition, the project will comply with the San Diego County Code of Regulatory Ordinances, Title 6, Div. 8, Chap. 3, Septic Tanks and Seepage Pits. Therefore, the project has soils capable of adequately supporting the OSWS as determined by the authorized local public agency.
- 17(b) The project does not include new or expanded water or wastewater treatment facilities. Based on the service availability forms received, the project will not require construction of new or expanded water or wastewater treatment facilities. Service availability forms have been provided which indicate adequate water treatment facilities are available to the project from the following agencies/districts: Vallecitos Water District dated February 27, 2013. Therefore, the project will not require any construction of new or expanded facilities, which could cause significant environmental effects.
- 17(c) The project involves new storm water drainage facilities including bioretention systems. Refer to the Stormwater Quality Management Plan (SWQMP) dated August 29, 2019 for more information. However, these facilities will not result in additional adverse physical effects beyond those already identified in other sections of this environmental analysis.

- 17(d) The project requires water service from the Vallecitos Water District. A Service Availability Letter from the Water District has been provided, indicating adequate water resources and entitlements are available to serve the requested water resources. Therefore, the project will have sufficient water supplies available to serve the project.
- 17(e) The proposed project will rely completely on an on-site wastewater system (septic system); therefore, the project will not interfere with any wastewater treatment provider's service capacity.
- 17(f) Implementation of the project would generate solid waste. All solid waste facilities, including landfills require solid waste facility permits to operate. There are five permitted active landfills in San Diego County with remaining capacity to adequately serve the project. Furthermore, operation of the proposed facility will help with local and state plans and goals to reduce green waste and CDI materials being disposed at landfills.
- 17(g) Implementation of the project will 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 21440et seq.). The project will deposit all solid waste at a permitted solid waste facility and therefore, will comply with Federal, State, and local statutes and regulations related to solid waste.

Conclusion

As discussed above, the project would not result in any significant impacts to utilities and service systems; therefore, the project would not result in an impact which was not adequately evaluated by the GPU EIR.

Appendix:

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 a list of project specific technical studies used to support the analysis of each potential environmental effect:

Aesthetics

Visual Resources Impact Report for Hilltop Group, by TRS Consultants, dated December 2014

Memorandum concerning the Visual Impact Analysis for the NCER Project, by Dudek, dated December 22, 2017

Air Quality

Air Quality and Greenhouse Gas Emissions Assessment (Memorandum), Dudek, dated June 3, 2019.

Biology

Biological Assessment Report, North County Environmental Resources, BLUE Consulting, March 10, 2013

Analysis of California Gnatcatcher Movement through the North County Environmental Resources (NCER) Recycling Facility Project Site, Dudek, December 8, 2017

California Gnatcatcher Presence-Absence Survey Report for the North County Environmental Resources (NCER) Recycling Facility Project, Dudek, December 6, 2017

North County Environmental Resources – Vegetation Mapping Update, Dudek, August 27, 2019

Cultural

Negative Cultural Resources Survey Report for the Mesa Rock Nursery Project, Brian F. Smith and Associates, June 1, 2009

Tribal Outreach Summary for the North County Environmental Resources (NCER) Recycling Facility Project, Dudek, January 3, 2019

Hazards/Hazardous Materials

Fire Protection Plan-Short Form dated November 27, 2012

Hazardous Materials Review of North County Environmental Resources (NCER) Recycling Facility Project, Memorandum from Nicolas Gustafson, August 26, 2019

Hazardous Load Check/Materials Program, received 10/15/2018, based on Integrated Waste Management Board Publication #232-06-005 05/07

Integrated Pest Management Report, received 10/15/2018, (Draft provided by the IPM Institute)

Hydrology/Water Quality

Drainage Study, Excel Engineering dated August 29, 2019

Stormwater Quality Management Plan (SWQMP), Excel Engineering dated August 29, 2019

Noise

Noise Assessment, North County Environmental Resources Recycling Center, LDN Consulting, Inc., May 21, 2013

Supplementary Noise Technical Analysis, North County Environmental Resources Recycling Facility Access Road, DUDEK, May 21, 2019

Traffic/Transportation

Preliminary Traffic Assessment, prepared by RBF, May 6, 2013

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.sandiegocounty.gov/content/dam/sdc/pds/gpupdate/docs/BOS_Aug2011/EIR/FEIR_5.00 - References 2011.pdf](http://www.sandiegocounty.gov/content/dam/sdc/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