



County of San Diego

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November 13, 2023

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

Project Name: Ortega Construction Expansion
Project Record ID: PDS2018-STP-98-031W1
Environmental Log No. LOG NO. PDS2023-ER-23-14-013

Lead Agency Name and Address:
County of San Diego
Planning and Development Services
5510 Overland Avenue, Suite 310
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County Staff Contact:
Sean Oberbauer, Project Manager
Phone: (619) 323-5287
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Project Location:
15247 Olde Highway 80 and 15229 Highway 8 Business, El Cajon, CA 92021
Lakeside Community Planning Area
Unincorporated County of San Diego
Thomas Guide Coordinates: Page 1233, Grid A3
APNs: 396-111-10-00, 396-111-17-00

Project Applicant:
Contact: Larry Walsh, 607 Aldwych Road, El Cajon, CA 92020
Phone: (619) 588-6747
Owner: Archie Maurice Ortega, 10125 Channel Road, Lakeside, CA 92040
Phone: (619) 719-8710

General Plan

Community Plan: Lakeside
Regional Category: Semi-Rural
Land Use Designation: Limited Impact Industrial (I-1)/Medium Impact Industrial (I-2)
Density: -
Floor Area Ratio (FAR): 0.50/0.60

Zoning

Use Regulation: Limited Impact Industrial (M52)/General Impact Industrial (M54)
Minimum Lot Size: 2 Acres
Building Type: L – Detached or Attached Nonresidential Buildings
Setback: C – 60-foot Front Yard, 15-foot Interior Side Yard, 35-foot Exterior Side Yard, 50-foot Rear Yard
Height: G – 35-feet maximum, 2 stories
Special Area Designator: B – Community Design Review

Project Description

Location:

The proposed project is located at 15247 Olde Highway 80 and 15229 Highway 8 Business in the Lakeside Community Planning Area in the unincorporated County of San Diego. The project site includes two adjacent parcels for a total of an approximately 5.07-acre project site. The western parcel (APN: 396-111-10-00) is approximately 2.57 acres and the eastern parcel (APN: 396-111-17-00) is approximately 2.5 acres.

Site Description:

The Site Plan Modification is proposed on an approximately 5.07-acre project site consisting of two adjacent parcels in order to expand an existing construction yard as well as construct an approximately 20,000 square foot warehouse with 10,000 square feet of office in two stories. The project site is subject to the Semi-Rural General Plan Regional Category. The western parcel is subject to the Limited Impact Industrial (I-1) Land Use Designations the eastern parcel is subject to the Medium Impact Industrial (I-2) Land Use Designation. The Zoning Use Regulation for the western parcel is Limited Impact Industrial (M52) and the eastern parcel is General Impact Industrial (M54). The project site is located at 15247 Olde Highway 80 and 15229 Highway 8 Business, in the Lakeside Community Planning Area in the unincorporated County of San Diego.

On August 13, 1999, a Site Plan Record ID: S98-031 was approved to permit the installation of a modular office building on the existing construction yard on the eastern parcel. The western parcel previously contained a residential structure that was removed under demolition permit Record ID: PDS2016-RESALT-006162.

Discretionary Actions:

The project consists of the following action: Site Plan (STP) Modification. The STP Modification would allow for the expansion of an existing construction yard as well as construct an approximately 20,000 square foot warehouse with 10,000 square feet of office in two stories on two parcels on a 5.07-acre project site. The Site Plan Modification is required in accordance with the “B” Special Area designator for the property for community design review.

Project Description:

The project is a Site Plan Modification is on an approximately 5.07-acre project site consisting of two adjacent parcels in order to expand an existing construction yard as well as construct an approximately 20,000 square foot warehouse with 10,000 square feet of office in two stories. The eastern parcel is developed with existing office structures, accessory structures, and a shade structure which are proposed to be retained. 60 new parking spaces are proposed on the western parcel to serve the proposed warehouse and offices and 18 parking spaces will be retained on the eastern parcel. Water service is proposed to be provided by Padre Dam Municipal Water District. Sewer service for the expansion is proposed to be provided by the San Diego County Sanitation District in the Lakeside Service Area. The project will require annexation into the applicable sewer district upon coordination with the Local Agency Formation Commission (LAFCO). Access would be provided by two driveways on the eastern parcel connecting to Olde Highway 80 and a single driveway on the western parcel connecting to Olde Highway 80. Earthwork will consist of a balanced site of 10,000 cubic yards of cut and fill of material.

The project site is subject to the Semi-Rural General Plan Regional Category. The western parcel is subject to the Limited Impact Industrial (I-1) Land Use Designations the eastern parcel is subject to the Medium Impact Industrial (I-2) Land Use Designation. The Zoning Use Regulation for the western parcel is Limited Impact Industrial (M52) and the eastern parcel is General Impact Industrial (M54). The Site Plan Modification is required in accordance with the “B” Special Area designator for the property for community design review.

Overview of 15183 Checklist

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

General Plan Update Program EIR

The County of San Diego General Plan Update (GPU) establishes a blueprint for future land development in the unincorporated County that meets community desires and balances the environmental protection goals with the need for housing, agriculture, infrastructure, and economic vitality. The GPU applies to all of the unincorporated portions of San Diego County and directs population growth and plans for infrastructure needs, development, and resource protection. The GPU included adoption of new General Plan elements, which set the goals and policies that guide future development. It also included a corresponding land use map, a County Road Network map, updates to Community and Subregional Plans, an Implementation Plan, and other implementing policies and ordinances. The GPU focuses population growth in the western areas of the County where infrastructure and services are available in order to reduce the potential for growth in the eastern areas. The objectives of this population distribution strategy are to: 1) facilitate efficient, orderly growth by containing development within areas potentially

served by the San Diego County Water Authority (SDCWA) or other existing infrastructure; 2) protect natural resources through the reduction of population capacity in sensitive areas; and 3) retain or enhance the character of communities within the unincorporated County. The SDCWA service area covers approximately the western one third of the unincorporated County. The SDWCA boundary generally represents where water and wastewater infrastructure currently exist. This area is more developed than the eastern areas of the unincorporated County, and would accommodate more growth under the GPU.

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

Summary of Findings

The Project 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 [http://www.sdcounty.ca.gov/PDS/gpupdate/docs/BOS_Aug2011/EIR/FEIR_7.00 -
_Mitigation Measures 2011.pdf](http://www.sdcounty.ca.gov/PDS/gpupdate/docs/BOS_Aug2011/EIR/FEIR_7.00_-_Mitigation_Measures_2011.pdf) for complete list of GPU Mitigation Measures.

A comprehensive environmental evaluation has been completed for the project as documented in the attached §15183 Environmental Checklist. This evaluation concludes that the project qualifies for an conformance with CEQA in accordance with §15183 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.

The project qualifies for conformance with CEQA in accordance with CEQA Guidelines §15183 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 proposed project consists of industrial uses and does not propose additional development density or residential uses that would be in conflict with the Limited Impact Industrial (I-1) and Medium Impact Industrial (I-2) General Plan Land Use Designations or Semi-Rural Regional Category for which the GPU EIR was certified.

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 subject property is no different than other properties in the surrounding area, and there are no project specific effects which are peculiar to the project or its site. The project site is located in an area adjacent to industrial zoned property along Olde Highway 80. The property does not support any peculiar environmental features, and the project would not result in any peculiar effects.

In addition, as explained further in the 15183 Checklist below, all project impacts were adequately analyzed by the GPU EIR. The project could result in potentially significant impacts to Biological Resources. However, applicable mitigation measures and project design features related to Biological Resources as specified within the GPU EIR have been made conditions of approval for this project. Additionally, project design features consistent with recent State regulations as well as consistency with applicable ordinances, CEQA guidelines for determining significance, and

Board Policies that were identified as mitigation measures within the GPU EIR associated with Transportation/Traffic, Air Quality, Greenhouse Gas Emissions, Noise, Wildfire, Hydrology/Water Quality, Public Services, and Land Use and Planning have been made conditions of approval for this project.

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 Modification and would represent a small part of the growth that was forecasted 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 Checklist below, no potentially significant off-site or cumulative impacts have been identified which were not previously evaluated.

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

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

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

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

_____ Signature	November 16, 2023 Date
Sean Oberbauer Printed Name	Project Manager Title

CEQA Guidelines §15183 Environmental 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 conformance with CEQA in accordance with §15183 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
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1. Aesthetics – Would the Project:

- | | | | |
|--|--------------------------|--------------------------|--------------------------|
| a) Have a substantial adverse effect on a scenic vista? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| c) Substantially degrade the existing visual character or quality of the site and its surroundings? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| d) Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Discussion

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

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

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

Approximately five Resource Conservation Areas (RCAs) have been identified by the County in the Lakeside Community Plan. The nearest RCA is located south of project site across Interstate 8. The RCA is the Puetz Valley RCA which primarily consists of biological resources such as oak woodland and riparian vegetation. The proposed project will not impact views of the RCA as the RCA is located across Interstate 8 and south of the project site.

The project is located adjacent to a portion of Interstate 8 that is designated as a Scenic Highway identified in the General Plan. The project site contains existing landscaping along the rear of the site. In addition, Interstate 8 contains existing landscaping and mature trees along the entire northern edge of Interstate 8 that screens the project site from views along Interstate 8. Drivers utilizing Interstate 8 would have limited views of the proposed

project due to the mature landscaping located directly adjacent to Interstate 8 and the project site. The proposed warehouse and office will be visually compatible with existing structures and industrial uses that are located along Interstate 8 and in the project vicinity. The project is located within the boundaries of the Lakeside Community Planning Area on a site subject to a "B" Special Area Designator which requires the processing of a Site Plan Modification permit in order to demonstrate conformance with the Lakeside Community Plan. Plot plans including a site design and layout, architecture elevations, conceptual signage, and conceptual landscaping have been submitted as part of the Site Plan Modification application process. Therefore, the Project will not have a substantial adverse effect on a scenic vista.

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

No Scenic Highways designated by Caltrans are in proximity to the Project site. However, the County General Plan identifies roadways that are designated as scenic corridors within the Conservation and Open Space Element and have been included as part of the County Scenic Highway System. The response to 1(a) includes an analysis related to the project's proximity to Interstate 8, the nearest scenic highway identified in the County of San Diego General Plan. The project is conditioned to maintain existing mature trees located in the rear of the property. The project consists of a balanced graded site and does not propose additional construction on steep slopes that require major alterations to the existing landform. Additional analysis regarding impacts to scenic resources and visual character can be found in response 1(c). As the proposed Project would have a less than significant impact for the reasons detailed above and responses 1(a) and 1(c), the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

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

The project is located within the boundaries of the Lakeside Community Planning Area on a site subject to a "B" Special Area Designator which requires the processing of a Site Plan Modification permit in order to demonstrate conformance with the Lakeside Community Plan. Plot plans including a site design and layout, architecture elevations, conceptual signage, and conceptual landscaping have been submitted as part of the Site Plan Modification application process. The project would be consistent with the existing visual character of the project site and views within the community. Uses in the surrounding project vicinity consist of industrial uses located along Olde Highway 80 as well as recreational vehicle (RV) parks. The proposed warehouse and office structure reaches a maximum height of 35 feet and is two stories. The property is subject to a "G" height designator which requires all structures to meet a maximum height of 35 feet and

be two stories. The structure will be compatible with the existing structures in the project vicinity as there are structures of comparable bulk and scale such as an over 25,000 square foot warehouse and office structure located approximately 800 feet of the project site. The project also proposes landscaping such as trees within the parking lot in order to comply with the Lakeside Design Guidelines and to assist with screening the on-site structures from public views. Refer to response 1(a) and 1(b) for additional discussions regarding impacts to the existing visual character of the project site and vicinity. The project as designed will not substantially degrade the existing visual character or quality of the site and its surroundings.

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

- 1(d) The GPU EIR concluded this impact to be significant and unavoidable. Commercial lighting would be required to conform with the County’s Light Pollution Code to prevent spillover onto adjacent properties and minimize impacts to dark skies. The project has been conditioned to ensure conformance with the County’s Lighting Code during any processing of a building permit for the project. The Project is conditioned to be subject to the performance and lighting standards outlined Section 6300 of the Zoning Ordinance in order to prevent light pollution and spill onto adjacent properties. Lighting for the signage of the project is required to be externally illuminated in accordance with the Lakeside Design Guidelines. The project contains windows and other typical architectural glass features associated with office and warehouse structures. Therefore, the project will not create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area.

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

Conclusion

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

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

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

- a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide or Local Importance as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, or other agricultural resources, to a non-agricultural use?
- b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?
- c) Conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland zoned Timberland Production?
- d) Result in the loss of forest land, conversion of forest land to non-forest use, or involve other changes in the existing environment, which, due to their location or nature, could result in conversion of forest land to non-forest use?
- e) Involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Important Farmland or other agricultural resources, to non-agricultural use?

Discussion

2(a) The GPU EIR concluded this impact to be significant and unavoidable. The Project site contains lands designated as prime soils but not as Farmland of Local Importance according to the Farmland Mapping and Monitoring Program (FMMP). The eastern parcel does not contain agricultural resources and received approval for the operation of a construction yard tied to the original Site Plan in the late 1990s. The eastern parcel has previously been utilized for construction equipment rental uses. Based on historic imagery, a single-family residence was constructed on the western parcel in the mid-1960s. The residence was demolished in the mid-2010s in accordance with demolition permit Record ID: PDS2016-RESALT-006162. Based on historic imagery, the western parcel has not had an agricultural use such as agricultural fields for at least 30 years. The soils have been compacted and used for storage associated with the residential property. Additionally, the Project site does not contain 10 acres or contiguous Prime Farmland or Statewide Importance Soils as defined by the FMMP. Therefore, the site would not be considered to be a viable agricultural resource and no potentially significant project or cumulative level conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide or Local Importance to a non-agricultural use would occur as a result of this Project. Therefore, no potentially significant impact or conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide or Local Importance to a non-agricultural use would occur as a result of this project. As previously discussed, the GPU EIR determined impacts from direct and indirect conversion of agricultural resources to be significant and unavoidable. As the project would have a less than significant impact for the reasons detailed above, the project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 2(b) The GPU EIR concluded this impact to be less than significant with mitigation. The Project site is zoned Limited Industrial and General Impact Industrial Zoning Use Regulations. The nearest lands under Williamson Act Contract or in an agricultural preserve are located over 2 miles north of the Project site. Due to distance, no land-use interface conflicts would occur. Additionally, the Project is for the development of an industrial use such as a construction yard and warehouse office which is permitted within the M52 and M54 zones and is adjacent to properties subject to commercial, industrial, and residential uses. Therefore, the Project would not conflict with existing zoning for agricultural use or a Williamson Act Contract.

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

- 2(c) The GPU EIR concluded this impact to be significant and unavoidable. The project site including any offsite improvements do not contain any forest lands as defined in Public Resources Code section 12220(g), therefore project implementation would not result in the loss or conversion of forest land to a non-forest use. The outer edge of the Cleveland National Forest is located approximately 2 miles northeast of the project site. Thus, due to distance, the Project would have no impact on the Forest. In addition, the County of San Diego does not have any existing Timberland Production Zones.

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

- 2(d) The GPU EIR concluded this impact to be significant and unavoidable. As indicated in response 2(c), the Project site, or any off-site improvements, are not located near any forest lands. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 2(e) The GPU EIR concluded this impact to be significant and unavoidable. No agricultural operations are currently taking place on the Project site. In addition, no impacts would occur in association with interface conflicts. Please refer to response 2(a) and 2(b) for a discussion on off-site agricultural resources and interface conflicts.

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

Conclusion

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

1. No peculiar impacts to the Project or its site have been identified.

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

Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
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3. Air Quality – Would the Project:

- | | | | |
|---|--------------------------|--------------------------|--------------------------|
| a) Conflict with or obstruct implementation of the San Diego Regional Air Quality Strategy (RAQS) or applicable portions of the State Implementation Plan (SIP)? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| d) Expose sensitive receptors to substantial pollutant concentrations? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| e) Create objectionable odors affecting a substantial number of people? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Discussion

3(a) The GPU EIR concluded this impact to be less than significant. The Regional Air Quality Standard (RAQS) and State Implementation Plan (SIP) are based on General Plans within the region and the development assumptions contained within them. The project site is subject to the Semi-Rural General Plan Regional Category. The western parcel is subject to the Limited Impact Industrial (I-1) Land Use Designations the eastern parcel is subject to the Medium Impact Industrial (I-2) Land Use Designation. The Zoning Use Regulation for the western parcel is Limited Impact Industrial (M52) and the eastern parcel is General Impact Industrial (M54). The Limited Impact Industrial (M52) zone permits all uses associated with the construction yard, warehouse, and office within an enclosed structure in accordance with sections 2520 through 2525 of the Zoning Ordinance. The existing construction yard is permitted within the General Impact Industrial (M54) zone without enclosures in accordance with sections 2540 through 2545 of the Zoning Ordinance. The Site Plan Modification is required in accordance with the “B” Special Area designator for the property for community design review. The proposed uses are consistent with the General Plan Designation and the Zoning for the site and a General Plan Amendment or Zoning Reclassification is not required for the project. Because the proposed Project is allowed under the General Plan land use designation, which is used in San Diego

Association of Governments' (SANDAG's) growth projections, it is consistent with San Diego County Air Pollution Control District's (SDAPCD's) Regional Air Quality Strategy (RAQS) and portions of the State Implementation Plan (SIP). The project is conditioned for the installation of electrical vehicle parking spaces consistent with CALGreen Tier 2 Standards which is consistent with measure Air-2.1 in the General Plan EIR. In addition, the construction and operational emissions from the Project would be below established screening-level thresholds (SLTs), as addressed under 3(b) below, and would not violate any ambient air quality standards. As such, the project would not conflict with either the RAQS or the SIP. Therefore, the project was anticipated in RAQS and SIP and would not conflict or obstruct implementation of these plans.

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

- 3(b) The GPU EIR concluded impacts to be significant and unavoidable. In general, air quality impacts from land use projects are the result of emissions from area sources (landscaping and consumer products), energy (natural gas), transportation (on-road mobile sources), and short-term construction activities. The County of San Diego (County) has identified significance SLTs which incorporate SDAPCD's established air quality impact analysis trigger levels for all new source review (NSR) in SDAPCD Rule 20.2 and Rule 20.3. These SLTs identified in the County Guidelines can be used as numeric methods to demonstrate that a project's total emissions (e.g., stationary and fugitive emissions, as well as emissions from mobile sources) would not result in a significant impact to air quality. SLTs for volatile organic compounds (VOCs) are based on the threshold of significance for VOCs from the South Coast Air Quality Management District (SCAQMD) for the Coachella Valley (which is more appropriate for the San Diego Air Basin). The County's SLTs and SDAPCD's trigger levels were developed in support of State and federal ambient air quality standards that are protective of human health.

The project is a Site Plan Modification is on an approximately 5.07-acre project site consisting of two adjacent parcels in order to expand an existing construction yard as well as construct an approximately 20,000 square foot warehouse with 10,000 square feet of office in two stories. The eastern parcel is developed with existing office structures, accessory structures, and a shade structure which are proposed to be retained. 60 new parking spaces are proposed on the western parcel to serve the proposed warehouse and offices and 18 parking spaces will be retained on the eastern parcel. Access would be provided by two driveways on the eastern parcel connecting to Olde Highway 80 and a single driveway on the western parcel connecting to Olde Highway 80. Earthwork will consist of a balanced site of 10,000 cubic yards of cut and fill of material. Construction activities would be subject to SDAPCD Rule 55 to reduce fugitive dust and the project is conditioned to implement dust control measures to reduce fugitive dust. The air quality emissions for construction of the project are evaluated in an Air Quality and Greenhouse Gas Technical Study by Bluescape Environmental dated May 2, 2023. As detailed in the analysis, the emissions generated during construction activities and the operation of the project would not exceed San Diego County screening level thresholds for VOCs, NO_x, CO, SO_x, PM₁₀, or PM_{2.5}. Operations of the project are anticipated to generate approximately 90 average daily trips (ADT). Due to the minimal amount of additional average daily trips associated with the project, the project is not anticipated to generate air quality emissions above screen level thresholds associated with the accumulation of vehicles in high quantities of traffic. Sources of emissions or pollutants associated with

operation of the project are primarily from mobile sources and operation of vehicles and construction equipment for the project. As detailed in the analysis, the project will not result in emissions or pollutants beyond screening level thresholds or violate any air quality standard. Additionally, the warehouse and offices will include storage of vehicles within a warehouse which will assist with preventing emissions from leaving the interior of structures and affecting nearby properties. The emissions generated during construction activities of the project will also primarily involve emissions from mobile sources with construction vehicles and fugitive dust. As detailed in the analysis for the project, the emissions and pollutant concentrations would not exceed San Diego County screening level thresholds for VOCs, NO_x, CO, SO_x, PM₁₀, or PM_{2.5}. The project is consistent with measures Air-2.5, 2.6, and 2.7 outlined in the General Plan EIR which require projects to be consistent with APCD requirements, implementation of dust control measures such as water trucks, and the use of the County Guidelines of Determining Significance for Air Quality. Therefore, the project's regional air quality impacts would be less than significant through the implementation of measures as detailed in the General Plan EIR.

- 3(c) The GPU EIR concluded this impact to be significant and unavoidable. The project would contribute PM₁₀, NO_x, and VOCs emissions from construction/grading activities; however, the incremental increase would not exceed established screening thresholds (see response 3(b)).

As previously discussed, the GPU EIR determined significant and unavoidable impacts to non-attainment criteria pollutants. However, the project would have a less than significant impact to non-attainment criteria pollutants for the reasons stated above. Therefore, the project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 3(d) The GPU EIR concluded this impact to be significant and unavoidable. The project consists of the construction and operation of a construction office and warehouse and does not propose residential uses or uses typically associated with sensitive receptors. The project is located along Olde Highway 80 and Interstate 8 and is adjacent to industrial and commercial uses as well as an RV park. All properties adjacent to the project site are industrial zoning. As detailed in the analysis prepared for the project, the operation of the construction warehouse and office is not anticipated to be a point-source of significant emissions of pollutants. Further information can be found in response 3(b).

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

- 3(e) The GPU EIR determined less than significant impacts from objectionable odors. The project could produce objectionable odors during construction; however, these substances, if present at all, would only be in trace amounts and would not be distinguishable due to the location of the project adjacent to Olde Highway 80 and Interstate 8. Land uses and industrial operations typically associated with odor complaints include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, refineries, landfills, dairies, and fiberglass molding. Operations of the project may result in temporary objectionable odors through the use of construction equipment and vehicles and odors resulting from exhaust and asphalt paving activities. The project does not include uses that are typically associated with long-term objectionable odors. The project is located along Olde Highway 80 and Interstate 8 and is adjacent to industrial and

commercial uses as well as an RV park. All properties adjacent to the project site are industrial zoning. It is unlikely that the odors from the project would be distinguishable from existing sources given the vehicle emissions associated with adjacent roadways in the vicinity of the project site as the project is adjacent to Interstate 8 and Olde Highway 80. The project is also required to comply with SDAPCD Rule 51, public nuisance, which would require the limiting of objectionable odors to be emitted from the site. Therefore, the project would not create objectionable odors affecting a substantial number of people and the project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

As previously discussed, the GPU EIR determined less than significant impacts from objectionable odors. As the Project would have a less than significant impact from objectionable odors for the reasons stated above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

Conclusion

The project could result in potentially significant impacts to Air Quality; however, further environmental analysis is not 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 EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. Feasible mitigation measures contained within the GPU EIR will be applied to the project. Air-2.1, Air-2.5, Air-2.6, Air-2.7

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?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool,

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

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

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

Discussion

4(a) The GPU EIR concluded this impact to be significant and unavoidable. Biological resources on the project site were evaluated in a Biological Resource Letter Report prepared by Vincent Scheidt dated May 2023. The site contains 0.53 acres of disturbed southern coast live oak riparian forest, 4.36 acres of disturbed/developed habitat, and 0.21 acres of coast live oak woodland. No sensitive wildlife or plant species were identified on the site. As a result of this project, impacts will occur to 1.53 acres of disturbed habitat. The site is located within the MSCP but is not designated as a Pre-approved Mitigation Area (PAMA) or a Biological Resource Core Area (BRCA).

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: permanent fencing retained along the riparian and coast live oak woodland habitat to protect from indirect impacts, installation of a continuous ring of six foot long concrete wheel stops to prevent traffic and storage under the oak trees, and breeding season avoidance to prevent brushing, clearing, and/or grading between January 1 and September 15. The GPU EIR identified these mitigation measures as Bio 1.6 and Bio 1.7.

4(b) The GPU EIR concluded this impact to be significant and unavoidable. Based on the Biological Resource Letter Report, there is a drainage present on the project site which qualifies as a wetland and jurisdictional water. No impacts will occur to the drainage. The following sensitive habitats were identified on the site: disturbed southern coast live oak riparian forest and coast live oak woodland. As detailed in response a) above, direct and indirect impacts to sensitive natural communities identified in the RPO, NCCP, Fish and Wildlife Code, and Endangered Species Act are mitigated.

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: permanent fencing retained along the riparian and coast live oak woodland habitat to protect from indirect impacts, installation of a continuous ring of six foot long concrete wheel stops to prevent traffic and storage under the oak trees, and breeding season avoidance to prevent brushing, clearing, and/or grading between January 1 and September 15. The GPU EIR identified these mitigation measures as Bio 1.6 and Bio 1.7.

4(c) The GPU EIR concluded this impact to be less than significant with mitigation. The proposed project site contains a wetland as defined by Section 404 of the Clean Water

Act identified as Los Coches Creek in the rear of the property. The previously approved Site Plan for the eastern parcel includes conditions for wheel stops in order to prevent impacts to oak trees and resources in the rear of the property. Fencing and wheel stops will be retained and installed on both parcels in order to prevent indirect impacts to the resource in the rear of the property. As previously discussed, the GPU EIR determined impacts to federally protected wetlands as significant with mitigation. Therefore, the Project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 4(d) The GPU EIR concluded this impact to be significant and unavoidable. Based on a GIS analysis, the County's Comprehensive Matrix of Sensitive Species, and a Biological Resource Letter Report, it was determined that the site is not part of a regional linkage/corridor as identified on MSCP maps nor is it in an area considered regionally important for wildlife dispersal. The site would not assist in local wildlife movement as it lacks connecting vegetation and visual continuity with other potential habitat areas in the general project vicinity. The primary wildlife corridors near the project site are located south of Interstate 8. The adjacent parcels to the project site have been graded and impacted or have been built. Lastly, the project site is also not located within a pre-approved mitigation area within an adopted MSCP Subarea.

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

- 4(e) The GPU EIR concluded this impact to be less than significant. The project is located within the adopted South County Multiple Species Conservation Program (MSCP) which requires the project to conform with the Biological Mitigation Ordinance (BMO). MSCP Findings of Conformance dated November 16, 2023 have been prepared for the project demonstrating the project's conformance with the MSCP and BMO. The project is consistent with the County's Guidelines for Determining Significance for Biological Resources, the Resource Protection Ordinance (RPO), and the Migratory Bird Treaty Act (MBTA) with the implementation of mitigation. The project will not 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. Therefore, the project will not 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.

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

Conclusion

The project could result in potentially significant impacts to biological resources; however, further environmental analysis is not 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 EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. Feasible mitigation measures contained within the GPU EIR will be applied to the project.

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

- | | | | |
|--|--------------------------|--------------------------|--------------------------|
| a) Cause a substantial adverse change in the significance of a historical resource as defined in 15064.5? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Discussion

- 5(a) The GPU EIR concluded this impact to be less than significant with mitigation. Based on an analysis of records, previous negative surveys, databases, historic imagery, aerial imagery, and review of previous permits by a County approved archaeologist, it has been determined that there are no impacts to historical resources because they do not occur within the project site. On August 13, 1999, a Site Plan Record ID: S98-031 was approved to permit the installation of a modular office building on the existing construction yard on the eastern parcel. The western parcel previously contained a residential structure that was removed under demolition permit Record ID: PDS2016-RESALT-006162. As previously discussed, the GPU EIR determined impacts on historic resources to be less than significant with mitigation. However, he proposed Project determined impacts on historic resources to be less than significant with no required mitigation. Therefore, the Project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.
- 5(b) The GPU EIR concluded this impact to be less than significant with mitigation. The grading and earth-disturbing activities required for the project will occur on the western parcel of the project site. Based on an analysis of records and historic imagery, the western parcel of the project site has contained agricultural uses or structures since the early 1950s at a minimum. Portions of the western parcel have previously been graded for the construction of a previous single-family residence on the project site. As considered by the General

Plan EIR, potential impacts to cultural resources will be mitigated through ordinance compliance and conformance with the County's Cultural Resource Guidelines if resources are encountered. The environmental documentation associated with the project does not consist of a Mitigated Negative Declaration, Negative Declaration, or Environmental Impact Report which requires AB-52 consultation. The project is required to conform with Grading Ordinance Sections 87.429 and 87.430 which requires grading operations to be suspended in the event that resources are encountered and a County Official shall be informed to evaluate potentially significant resources.

- 5(c) The GPU EIR concluded this impact to be less than significant. The site does not contain any unique geologic features that have been listed in the County's Guidelines for Determining Significance for Unique Geology Resources nor does the site support any known geologic characteristics that have the potential to support unique geologic features. As previously discussed, the GPU EIR determined impacts on unique geologic features as less than significant. As the Project would have a less-than-significant impacts for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.
- 5(d) The GPU EIR concluded this impact to be less than significant with mitigation. A review of the County's Paleontological Resources Maps and data on San Diego County's geologic formations indicates that the project is located on geological formations (Cretaceous Plutonic) that have a low sensitivity of containing unique paleontological resources. The project is required to conform with Grading Ordinance Sections 87.429 and 87.430 which requires grading operations to be suspended in the event that resources are encountered and a County Official shall be informed to evaluate potentially significant 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 if resources are encountered.
- 5(e) The GPU EIR concluded this impact to be less than significant with mitigation. Based on an analysis of records and historic imagery, 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 project is required to conform with Grading Ordinance Sections 87.429 and 87.430 which requires grading operations to be suspended in the event that resources are encountered and a County Official shall be informed to evaluate potentially significant resources. As previously discussed, the GPU EIR determined impacts to human remains as less than significant with mitigation. The proposed Project determined impacts to human remains as potentially significant.

Conclusion

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

1. No peculiar impacts to the project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.

- 4. Feasible mitigation measures contained within the GPU EIR will be applied to the project.

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

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|---|--------------------------|--------------------------|--------------------------|
| a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Discussion

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

6(a) The project would increase the demand and consumption of electricity at the project site during construction and operation, relative to existing conditions. CEQA requires mitigation measures to reduce “wasteful, inefficient and unnecessary” energy usages (Public Resources Code Section 21100, subdivision [b][3]). Neither the law nor the State CEQA Guidelines establish criteria that define wasteful, inefficient, or unnecessary use. The project is a Site Plan Modification is on an approximately 5.07-acre project site consisting of two adjacent parcels in order to expand an existing construction yard as well as construct an approximately 20,000 square foot warehouse with 10,000 square feet of office in two stories. The eastern parcel is developed with existing office structures, accessory structures, and a shade structure which are proposed to be retained. 60 new parking spaces are proposed on the western parcel to serve the proposed warehouse and offices and 18 parking spaces will be retained on the eastern parcel. Earthwork will consist of a balanced site of 10,000 cubic yards of cut and fill of material. Compliance with building code standards would result in highly energy-efficient buildings. However, compliance with building codes does not adequately address all potential energy impacts during construction and operation. The project is conditioned to not use natural gas for operations of the project throughout the duration of the permit. It can be expected that energy consumption, outside of the building code regulations, would occur through the transport of construction materials to and from the site during the construction phase, and trips to and from the site during the operational phase.

During the grading and construction phases of the Project, the primary energy source utilized would be petroleum from construction equipment and vehicle trips. To a lesser extent, electricity would also be consumed for the temporary electric power for as-necessary lighting and electronic equipment. Activities including electricity would be temporary and negligible; therefore, electricity use during grading and construction would not result in wasteful, inefficient, or unnecessary consumption of energy. Vehicle trips associated with the transportation of construction materials and construction workers commutes would also result in petroleum consumption, but to a lesser extent. Petroleum consumptions would be necessary for operation and maintenance of construction equipment and would not be beyond what is necessary for the Project. Lastly, the project is conditioned to prepare a debris management plan in order to recycle materials during construction and grading activities of the project. Due to the aforementioned factors, the Project's energy consumption during the grading and construction phase would not be considered wasteful, inefficient, or unnecessary.

Operation of the project would require use of water for landscape maintenance. The Project will obtain its water supply from Padre Dam Municipal Water District. The project would provide multiple sustainability features that would reduce transportation and building energy consumption and increase the efficient use of water through consistency with the County's Landscaping Ordinance, the project not requiring the use of natural gas for the operation of the project structures, and consistency with CALGreen Tier 2 standards for off-street vehicle requirements.

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

- 6(b) Many of the regulations regarding energy efficiency are focused on increasing the energy efficiency of buildings and renewable energy generation, as well as reducing water consumption and reliance on fossil fuels. The project includes sustainability measures such as water reduction measures as required by the Landscaping Ordinance and complying with CALGreen Tier 2 standards for off-street vehicle requirements. By complying the CALGreen Tier 2 standards, the Project will increase the availability of electrical vehicle charging spaces within the Lakeside community. Additionally, the project would be consistent with sustainable development and energy reduction policies such as policies COS-14.3 and COS-15.4 of the General Plan, through compliance with the most recent building code and Energy Efficiency Standards at the time of project construction. Further information can be found within response 6(a) as well as Section 8: Greenhouse Gas Emissions of the 15183 Environmental Checklist. Therefore, the project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

As previously discussed, the GPU EIR did not analyze Energy as a separate issue area under CEQA. Energy was analyzed under the GPU and GPU EIR and has been incorporated within General Plan Elements. The Project would not conflict with policies within the GPU related to energy use or conflict with or obstruct a state or local plan for renewable energy or energy efficiency as specified within Appendix G of the CEQA Guidelines.

Conclusion

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

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

Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
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7. Geology and Soils – Would the Project:

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

Discussion

7(a)(i) The GPU EIR concluded this impact to be less than significant. The Project 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, nor is it located within a known Active Fault Near-Source Zone. The County Guidelines for Determining Significance for Geologic Hazards consider a project to have a potentially significant impact if the project proposes any building or structure to be used for human occupancy over or within 50 feet of the trace of an Alquist-Priolo fault or County Special Study Zone Fault. The Project site is located approximately 20 miles northeast as well as southwest from the nearest Alquist-Priolo Fault Zones. Additionally, construction in accordance with the California Building Code Seismic Requirements would be required prior to the issue of a building permit. Therefore, a less than significant impact from the

exposure of people or structures to adverse effects from a known fault-rupture hazard zone would occur as a result of the proposed Project.

- 7(a)(ii) The GPU EIR concluded this impact to be less than significant. To ensure the structural integrity of all buildings and structures, the project must conform to the Seismic Requirements as outlined within the California Building Code. Therefore, compliance with the California Building Code and the County Building Code will ensure that the project will not result in a significant impact.
- 7(a)(iii) The GPU EIR concluded this impact to be less than significant. To ensure the structural integrity of all buildings and structures, the project must conform to the Seismic Requirements as outlined within the California Building Code. Therefore, compliance with the California Building Code and the County Building Code would ensure that the project would not result in a significant impact.
- 7(a)(iv) The GPU EIR concluded this impact to be less than significant. The site is not 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). As previously discussed, the GPU EIR determined less than significant impacts from exposure to seismic-related hazards and soil stability. As the proposed Project would have a less-than-significant, the project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.
- 7(b) The GPU EIR concluded this impact to be less than significant. According to the Soil Survey of San Diego County, the soils on-site are identified as Fallbrook-Vista sandy loams, 15 to 30 percent slopes, and Visalia sandy loam, 2 to 5 percent slopes, that have a soil erodibility rating of severe. 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) to prevent fugitive sediment. As previously discussed, the GPU EIR determined impacts from soil erosion and topsoil loss to be less than significant. As the project would have a less than significant impact for the reasons detailed above, the project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.
- 7(c) The GPU EIR concluded this impact to be less than significant. Landslide Susceptibility Areas was discussed in response (a)(iv). As indicated in response (a)(iv), the project site is not located within a "Landslide Susceptibility Area" as identified in the County Guidelines for Determining Significance for Geologic Hazards, and the potential for landslides to impact the proposed development is considered to be low.

Lateral spreading is a principal effect from liquefaction which was discussed in response 7(a)(iii). As discussed in response 7(a)(iii), the project site is located within a "Potential Liquefaction Area" as identified in the County Guidelines for Determining Significance for

Geologic Hazards. Subsidence and collapse may be caused by unstable geological structures or conditions. As stated in response 7(a), impacts to the project site from rupture of a known earthquake fault and strong seismic ground shaking or seismic-related ground failure would be unlikely to occur due to compliance with building code standards. Structures associated with the project consist of a 20,000 square foot warehouse with 10,000 square feet of office in two stories and do not consist of residential uses. The grading associated with the project will require the processing of a Major Grading Permit through Final Engineering which will require final geotechnical reports and soils report in order to ensure the structural integrity of the grading and buildings associated with the project. As previously discussed, the GPU EIR determined impacts from soil stability to be less than significant. As the project would have a less than significant impact with the consistency with building code standards, the project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 7(d) The GPU EIR determined impacts from expansive soils to be less than significant. The Project is not underlain by expansive soils. In addition, the Project would not result in a significant impact because compliance with the Building Code, preparation of a Soils Engineering Report, and implementation of standard engineering techniques would ensure structural safety. According to the Soil Survey of San Diego County the project is underlain by Fallbrook-Vista sandy loams, 15 to 30 percent slopes, and Visalia sandy loam, 2 to 5 percent slopes, and is not in an area anticipated to have expansive soils. The project will not result in a significant impact because compliance with the Building Code and implementation of standard engineering techniques will ensure structural safety.

As previously discussed, the GPU EIR determined impacts from expansive soils to be less than significant. As the Project would have a less-than-significant impact for the reasons detailed above, the Project would be consistent with the analysis within the GPU EIR because it would not create new impacts, increase impacts, and there is no new information of substantial importance than identified within the GPU EIR.

- 7(e) The GPU EIR concluded this impact to be less than significant. The Project site would rely on public water and sewer for the disposal of wastewater associated with the expanded construction of the warehouse and office for the project. The eastern parcel is developed with existing office structures, accessory structures, and a shade structure which are proposed to be retained and have been served by an on-site wastewater treatment system. Sewer service for the expansion is proposed to be provided by the San Diego County Sanitation District in the Lakeside Service Area as detailed in the service availability form dated September 2023. The project will require annexation into the applicable sewer district upon coordination with the Local Agency Formation Commission (LAFCO). The project is located within the Sphere of Influence boundary of the sewer district and nearby properties have been annexed into the San Diego County Sanitation District in the Lakeside Service Area. As such, the Project would not place septic tanks or alternative wastewater disposal systems on soils incapable of adequately supporting the tanks or system.

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

Conclusion

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

1. No peculiar impacts to the Project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. No mitigation measures contained within the GPU EIR would be required because Project specific impacts would be less than significant. 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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8. 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"/> |
| 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"/> |

Discussion

8(a) The General Plan and GPU EIR contain policies and mitigation measures associated with reducing greenhouse gas emissions including but not limited to compliance with the County Groundwater Ordinance, Landscape Ordinance, as well as implementation of solid waste reduction measures, reduction of Vehicle Miles Traveled (VMT). Additionally, the County of San Diego (County) General Plan incorporates smart growth and land planning principles intended to reduce vehicle miles traveled, and thereby reduce GHG emissions. Specifically, the General Plan directed preparation of a County Climate Action Plan (CAP) with reduction targets; development of regulations to encourage energy efficient building design and construction; and development of regulations that encourage energy recovery and renewable energy facilities, among other actions. As such, on February 14, 2018, the County Board of Supervisors (Board) adopted a CAP, which identifies specific strategies and measures to reduce GHG emissions in the largely rural, unincorporated areas of San Diego County as well as County government operations. The County’s 2018 Climate Action Plan (CAP) was set aside by the Fourth District Court of Appeal and rescinded by the Board. On September 30, 2020, the Board voted to set aside its approval of the County’s 2018 CAP and related actions because the Final Supplemental Environmental Impact Report (2018 CAP SEIR) was found to be out of compliance with CEQA. In response to this Board action, the County is preparing a CAP Update to revise the 2018 CAP and correct the items identified by the 4th District Court of Appeal in San Diego within the Final 2018 CAP SEIR that were not compliant. Therefore, compliance with the 2018 CAP was not utilized to determine potential greenhouse gas (GHG) emission impacts.

Executive Order (EO) S-3-05 and EO B-30-15 established GHG emission reduction targets for the state, and AB 32 launched the CARB Climate Change Scoping Plan that outlined the reduction measures needed to reach the 2020 target, which the state has achieved. As required by SB 32, the California Air Resource Board's (CARB) 2017 Climate Change Scoping Plan outlines reduction measures needed to achieve the 2030 target. AB 1279, the California Climate Crisis Act, codified the carbon neutrality target as 85 percent below 1990 levels by 2045. CARB's 2022 Scoping Plan was adopted by the CARB Board December of 2022. In the absence of a locally adopted significance threshold and a GHG emission reduction plan, Project impacts were assessed using a project-specific, locally appropriate threshold, as guided by CEQA Guidelines Section 15064.4. Pending adoption of a new CAP, appropriate GHG emissions thresholds were considered for purposes of this analysis. Based on the specific characteristics of this project including the Project's less than significant impact associated with Vehicle Miles Traveled (VMT), current guidance provided by the Bay Area Air Quality Management District (BAAQMD) was used to evaluate GHG emissions. For land use development projects, the BAAQMD recommends using the approach endorsed by the California Supreme Court in *Center for Biological Diversity v. Department of Fish & Wildlife* (2015) (62 Cal.4th 204), which evaluates a project based on its effect on California's efforts to meet the state's long-term climate goals. As the Supreme Court held in that case, a project that would be consistent with meeting those goals can be found to have a less than significant impact on climate change under CEQA. If a project would contribute its "fair share" of what would be required to achieve those long-term climate goals, then a reviewing agency can find that the impact would not be significant because the project would help to solve the problem of global climate change (62 Cal.4th 220–223). If a land use project incorporates all of the design elements necessary for it to be carbon neutral by 2045, then it would contribute its portion of what is needed to achieve the state's climate goals and would help to solve the cumulative problem. It can therefore be found to make a less than cumulatively-considerable climate impact. Because this guidance supports how a project would contribute its "fair share" of the statewide long-term GHG reduction goals, it is not specific to the BAAQMD region and can also be applied in the San Diego region. The information provided in the BAAQMD Justification Report is intended to provide the substantial evidence that lead agencies need to support their determinations about significance using these thresholds. The BAAQMD Justification Report analyzes what would be required of new land use development projects to achieve California's long-term climate goal of carbon neutrality by 2045. A new land use development project being built today needs to incorporate the following design elements to do its "fair share" of implementing the goal of carbon neutrality by 2045:

A) Projects must include, at a minimum, the following project design elements:

1) Buildings

- a) The project will not include natural gas appliances or natural gas plumbing (in both residential and nonresidential development).
- b) The project will not result in any wasteful, inefficient, or unnecessary energy usage as determined by the analysis required under CEQA Section 21100(b)(3) and Section 15126.2(b) of the State CEQA Guidelines.

2) Transportation

- a) Achieve a reduction in project-generated VMT below the regional average consistent with the current version of the California Climate Change Scoping Plan (currently 15 percent) or meet a locally adopted Senate Bill 743 VMT target, reflecting the recommendations provided in the Governor's Office of Planning and Research's Technical Advisory on Evaluating Transportation Impacts in CEQA:

- (i) Residential projects: 15 percent below the existing VMT per capita
 - (ii) Office projects: 15 percent below the existing VMT per employee
 - (iii) Retail projects: no net increase in existing VMT
- b) Achieve compliance with off-street electric vehicle requirements in the most recently adopted version of CALGreen Tier 2.

The Project is consistent with both the Building and Transportation design elements as outlined in the BAAQMD Justification Report. The Project is conditioned to not use natural gas for the operations of the warehouse and offices as detailed in the Air Quality and Greenhouse Gas Technical Study dated May 2, 2023 by BlueScape Environmental. Primary utilities and energy use associated with the operation of the project are anticipated to be associated with the use of electricity to power lighting and ongoing water and sewer services. Operation of the project would require use of water for landscape maintenance which is required to be in conformance with the Landscape Ordinance and requirements to demonstrating water use reduction. As detailed in Section 6: Energy Use, the Project is not expected to result in the wasteful use of energy.

In accordance with the traffic analysis prepared for the project by Urban Systems Associates, Inc dated November 23, 2021, the project is anticipated to generate 80 additional average daily trips. As detailed in the traffic analysis, the proposed offices and warehouse are intended to consolidate existing operations of the A.M. Ortega Construction company in the Lakeside area. The existing operations on the project site consist of ongoing construction equipment storage that have been generating trips since approval of the original Site Plan on the eastern property. In accordance with the adopted Transportation Study Guidelines, the project meets the CEQA VMT screening criteria for projects generating less than 110 average daily trips (ADT) and will not result in a significant VMT impact. Additionally, the Governor's Office of Planning and Research Technical Advisory on Evaluating Transportation Impacts in CEQA dated December 2018 includes an analysis that many agencies have chosen to adopt screening thresholds of 110 ADT as a small project screening threshold in order to determine if a project would not lead to a significant transportation/traffic impact associated with VMT. Because the project is anticipated to generate 80 ADT which is less than the 110 ADT small project screening threshold contemplated in the December 2018 Technical Advisory, the project would not lead to a significant transportation/traffic impact associated with VMT. The Project is also conditioned to be consistent with the CALGreen Tier 2 standards for compliance with off-street electric vehicle requirements which will result in increased availability of electrical vehicle charging stations within the Lakeside Community.

Lastly, the emissions associated with construction and operation of the project were quantified in the Air Quality and Greenhouse Gas Technical Study dated May 2, 2023 by BlueScape Environmental. Construction emissions associated with the development of the Project are temporary and expected to be approximately 291.8 metric tons of carbon dioxide equivalent (MTCO_{2e}). Operational emissions of the Project were estimated to be 177.1 MTCO_{2e}.

The project's implementation of design features for a "fair share" contribution towards the statewide goal of carbon neutrality by 2045 and the project's less than significant impact related to Vehicle Miles Traveled demonstrates that the project would not make a cumulatively considerable contribution to GHG emissions. Therefore, the project would not generate GHG emissions, either directly or indirectly, that would have a significant impact on the environment, and impacts would be less than significant.

- 8(b) The project site is subject to the Semi-Rural General Plan Regional Category. The western parcel is subject to the Limited Impact Industrial (I-1) Land Use Designations the eastern parcel is subject to the Medium Impact Industrial (I-2) Land Use Designation. The Zoning Use Regulation for the western parcel is Limited Impact Industrial (M52) and the eastern parcel is General Impact Industrial (M54). The Limited Impact Industrial (M52) zone permits all uses associated with the construction yard, warehouse, and office within an enclosed structure in accordance with sections 2520 through 2525 of the Zoning Ordinance. The existing construction yard is permitted within the General Impact Industrial (M54) zone without enclosures in accordance with sections 2540 through 2545 of the Zoning Ordinance. The Site Plan Modification is required in accordance with the “B” Special Area designator for the property for community design review. The proposed uses are consistent with the General Plan Designation and the Zoning for the site and a General Plan Amendment or Zoning Reclassification is not required for the project. Through its goals, policies, and land use designations, the County’s General Plan aims to reduce County-wide GHG emissions. Furthermore, the County’s General Plan growth projections were used to inform the development of the SANDAG Regional Transportation Plan and Sustainable Communities Strategy (SANDAG RTP/SCS). SANDAG’s RTP/SCS is the region’s applicable plan for reducing GHG emissions and is consistent with State GHG emissions reductions goals set by the California Air Resources Board (CARB).

In December of 2022, the CARB adopted a new Scoping Plan which outlined policies and strategies focused on three priority areas: 1. Transportation Electrification, 2. VMT Reduction, and 3. Building Decarbonization. As detailed in response 8(a), the Project will comply the three priority areas of the CARB scoping plan by increasing the availability of electrical vehicle charging stations, having a less than significant impact associated with VMT, and not including the use of natural gas for the operation of the project. Because the proposed project is consistent with the General Plan land use and zoning, it is also consistent with State GHG emission reduction targets as identified in the SANDAG RTP/SCS. Therefore, the project would be consistent with any applicable plan, policy, or regulation adopted for the purpose of reducing greenhouse gas emissions.

Conclusion

With regards to the issue area of Greenhouse Gas Emissions, the following findings can be made:

1. No peculiar impacts to the project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. The project will apply measures outlined within GPU EIR including but not limited to compliance with the County Groundwater Ordinance, Landscape Ordinance, as well as reduction of Vehicle Miles Traveled (VMT). Therefore, the Project would not result in an impact which was not adequately evaluated by the GPU EIR. The project will also apply project design features such as no use of natural gas as well as consistency with CALGreen Tier 2 standards for off-street parking.

Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
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9. Hazards and Hazardous Materials – Would the Project:

- | | | | |
|---|--------------------------|--------------------------|--------------------------|
| a) Create a significant hazard to the public or the environment through the routine transport, storage, use, or disposal of hazardous materials or wastes or through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| c) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, or is otherwise known to have been subject to a release of hazardous substances and, as a result, would it create a significant hazard to the public or the environment? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| d) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| e) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| g) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| h) Propose a use, or place residents adjacent to an existing or reasonably foreseeable use that would substantially increase current or future resident’s exposure to vectors, including mosquitoes, rats or flies, which are capable of transmitting significant public health diseases or nuisances? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Discussion

9(a) The GPU EIR concluded this impact to be less than significant. The project consists of the expansion of a construction yard to include an office and storage warehouse. The property

will store construction equipment and vehicles which may include incidental maintenance materials such as fuel and batteries for construction equipment and vehicles. As previously discussed, the GPU EIR determined impacts from transport, use and disposal of hazardous materials and accidental release of hazardous materials to be less than significant. The project conditions are consistent with General Plan Policy S-11.4 as analyzed in the GPU EIR. Any transportation of hazardous materials will require permitting from the Department of Environmental Health and Quality which may require the preparation of a hazardous materials business plan. Thus, for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 9(b) The GPU EIR concluded this impact to be less than significant. The project is located approximately a quarter of a mile south of the existing Blossom Valley Elementary School. The project consists of the expansion of a construction yard to include an office and storage warehouse. The property will store construction equipment and vehicles which may include incidental maintenance materials such as oil and batteries for construction equipment and vehicles. The project does not consist of the storage of hazardous materials or waste that would pose a hazard to nearby schools. Further information can be found in response 9(a) regarding required maintenance and handling of potentially hazardous materials associated with the project. Therefore, the project will not have any effect on an existing or proposed school.
- 9(c) The GPU EIR concluded this impact to be less than significant. The adjacent property to the east previously had an open case on Geotracker in the late 1980s. The case has since been closed. Based on historic imagery, the western parcel of the project site previously had agricultural fields in the 1950s. As detailed in the Air Quality section, the project is required to comply with APCD regulations and utilize water trucks during grading/construction in order to minimize dust and prevent release of materials in the ground and dirt. 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), and is not on or within 1,000 feet of a Formerly Used Defense Site. Further information regarding ongoing operations of the site and potential release of hazardous substances can be found in response 9(a). Therefore, the project will not emit or release hazardous materials due to the historic uses of the site.
- 9(d) The GPU EIR concluded this impact to be less than significant with mitigation. The proposed Project is not located within an Airport Influence Area or an Airport Land Use Compatibility Plan Area. Additionally, the Project is not located within an Airport Safety Zone, within an Avigation Easement, an Overflight area or within a Federal Aviation Administration Height Notification Surface area. In addition, 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.

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

- 9(e) The GPU EIR concluded this impact to be a significant and unavoidable impact. 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.

- 9(f)(i) OPERATIONAL AREA EMERGENCY PLAN AND MULTI-JURISDICTIONAL HAZARD MITIGATION PLAN: The GPU EIR concluded this impact related to section 9(f) to be significant and unavoidable. 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.
- 9(f)(ii) SAN DIEGO COUNTY NUCLEAR POWER STATION EMERGENCY RESPONSE PLAN: The property is not within the San Onofre emergency planning zone.
- 9(f)(iii) OIL SPILL CONTINGENCY ELEMENT: The project is not located along the coastal zone.
- 9(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.
- 9(f)(v) DAM EVACUATION PLAN: The Project site is not located within an identified dam inundation zone. Additionally, the development would not constitute a "Unique Institution" such as a hospital, school, or retirement home pursuant to the Office of Emergency Services included within the County Guidelines for Determining Significance, Emergency Response Plans.

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

- 9(g) The GPU EIR concluded this impact to be significant and unavoidable. 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 will comply with the regulations relating to emergency access, water supply, and defensible space specified in the Consolidated Fire Code. The project design has been reviewed and approved by the Lakeside Fire Protection District. The project will result in construction on currently vacant land that will develop the site with structures and landscaping that will be routinely maintained. The project does not propose a residential use for occupancy. Therefore, the project will not 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

9(h) The GPU EIR concluded this impact as less than significant. The project does not involve or support uses that would allow water to stand for a period of 72 hours or more (e.g. artificial lakes, agricultural ponds). The bioretention basins prepared for the project are required to be routinely maintained and monitored. Also, the project does not involve or support uses that will produce or collect animal waste, such as equestrian facilities, agricultural operations (chicken coops, dairies etc.), solid waste facility or other similar uses. Therefore, the project will not substantially increase current or future resident’s exposure to vectors, including mosquitoes, rats, or flies.

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

Conclusion

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

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

Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
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10. Hydrology and Water Quality – Would the Project:

a) Violate any waste discharge requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Is the project tributary to an already impaired water body, as listed on the Clean Water Act Section 303(d) list? If so, could the project result in an increase in any pollutant for which the water body is already impaired?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Could the proposed project cause or contribute to an exceedance of applicable surface or groundwater receiving water quality objectives or degradation of beneficial uses?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

10(a) The GPU EIR concluded this impact to be significant and unavoidable. A Priority Development Project Stormwater Quality Management Plan dated July 2022 prepared by Walsh Engineering and Surveying has been prepared for the project which identifies temporary/construction BMPs as well as post-construction BMPs in order to ensure that the project does not violate any waste discharge requirements. The project includes BMPs such as a biofiltration basin in order to treat stormwater runoff potential pollutants from the project resulting from operations and aspects of the project such as vehicle cleaning, parking lot runoff, and interior floor drains. Temporary construction BMPs such as hydroseeding will minimize erosion or siltation on or off-site. All proposed BMPs are outlined in the Priority Development Project Stormwater Quality Management Plan will be reviewed for conformance with any future construction permit associated with the project such as a Major Grading Permit reviewed during final engineering. These measures will enable the project to meet waste discharge requirements as required by the San Diego

Municipal Permit, as implemented by the BMP Design Manual. All stormwater and drainage facilities are required to comply with RWQCB requirements in accordance with the Municipal Separate Storm Sewer System (MS4) permit.

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) in the event that the project impacts an area of 1 or more acres.

10(b) The GPU EIR concluded this impact to be significant and unavoidable. The Project lies in the Coches (907.14) of the San Diego hydrologic unit. According to the Clean Water Act Section 303(d) list, a portion of this watershed is impaired including the Los Coches Creek and San Diego River. Pollutants of concern in the watershed include selenium, bacteria, manganese, nitrogen, phosphorous and dissolved solids. The project would comply with the Watershed Protection Ordinance (WPO) and would implement BMPs (as detailed in responses 10(a)) in order to prevent additional runoff and increase of pollutants into the water body. As previously discussed, the GPU EIR determined significant and unavoidable impacts to water quality standards and requirements. However, the proposed Project would have a less than significant impact to water quality standards with the implementation of a Project condition and compliance with local and state requirements. These requirements were identified by the GPU EIR as mitigation measures Hyd-1.2 through Hyd-1.5 for implementation of Low Impact Development Standards (LID), compliance with the Watershed Protection Ordinance (WPO), the Best Management Practices Design Manual, Groundwater Ordinance, and the County Guidelines for Determining Significance for Surface Water Quality, Hydrology and Groundwater Resources. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

10(c) The GPU EIR concluded this impact to be significant and unavoidable. The project does not propose the use of groundwater and will obtain water service from the Padre Dam Municipal Water District. As stated in responses 10(a) and 10(b) above, implementation of BMPs and compliance with required ordinances will ensure that project impacts are less than significant and the water quality of groundwater will not be significantly impacted.

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

10(d) The GPU EIR concluded this impact to be significant and unavoidable. The project will obtain water service from Padre Dam Municipal Water District and will not utilize groundwater resources for operations of the project. A water service availability form dated September 2023 has been provided for the project from Padre Dam Municipal Water District. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

10(e) The GPU EIR concluded this impact to be less than significant with mitigation. The project will result in the placement of fencing and support columns of a shade structure within a designated County of San Diego floodway. A No Rise Certification dated April 23, 2021

prepared by Walsh Engineering & Surveying, Inc. certifies that perimeter fencing for the project as well as the support columns for a shade structure will not result in any increase in flood levels or the volume or velocity of flood flows. Additionally, a CEQA Preliminary Drainage Study dated July 2022 prepared by Walsh Engineering & Surveying demonstrates that the project will not result in increased off-site flow of water. The project will implement temporary construction BMPs during construction which will minimize erosion or siltation on or off-site. Therefore, the project will not substantially alter the existing drainage pattern of the area and would be consistent with the analysis provided within the GPU EIR.

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

- 10(f) The GPU EIR concluded this impact to be less than significant with mitigation. As outlined in the project's SWQMP and in responses 10(a) and 10(b), the project will implement temporary/construction BMP's to reduce potential pollutants, including sediment from erosion or siltation, to the maximum extent practicable from entering storm water runoff and will ensure that project impacts are less than significant. The project will result in the placement of fencing and support columns of a shade structure within a designated County of San Diego floodway. A No Rise Certification dated April 23, 2021 prepared by Walsh Engineering & Surveying, Inc. certifies that perimeter fencing for the project as well as the support columns for a shade structure will not result in any increase in flood levels or the volume or velocity of flood flows. Additionally, a CEQA Preliminary Drainage Study dated July 2022 prepared by Walsh Engineering & Surveying demonstrates that the project will not result in increased off-site flow of water. Therefore, the project will not substantially alter the existing drainage pattern of the area and would be consistent with the analysis provided within the GPU EIR.

As previously discussed, the GPU EIR determined to be less than significant with mitigation. However, the proposed Project would have a less-than-significant impact to erosion or siltation (Hyd-1.2 through Hyd-1.5). Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR. Therefore, the Project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 10(g) The GPU EIR concluded this impact to be less than significant with mitigation. A CEQA Preliminary Drainage Study dated July 2022 prepared by Walsh Engineering & Surveying demonstrates that the project will not result in increased off-site flow of water. Additionally, a No Rise Certification dated April 23, 2021 prepared by Walsh Engineering & Surveying, Inc. certifies that perimeter fencing for the project as well as the support columns for a shade structure will not result in any increase in flood levels or the volume or velocity of flood flows. With mitigation, the proposed Project would have a less-than-significant impact with regards to exceeding the capacity of stormwater systems with consistency with measures (Hyd-1.2 through Hyd-1.5). Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 10(h) The GPU EIR concluded this impact to be significant and unavoidable. The project does not consist of the storage or generation of many pollutants related to runoff. The project

consists of the expansion of an existing construction equipment yard to include an office and a warehouse which primarily has potential sources of pollutants related to surface runoff from a parking lot and storage of construction equipment. As stated in responses 10(a) and 10(b) above, implementation of BMPs and compliance with required ordinances will ensure that project impacts are less than significant.

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

- 10(i) The GPU EIR concluded this impact to be less than significant with mitigation. The project does not propose any housing or structures for residential occupancy. The project will result in the placement of fencing and support columns of a shade structure within a designated County of San Diego floodway. A No Rise Certification dated April 23, 2021 prepared by Walsh Engineering & Surveying, Inc. certifies that perimeter fencing for the project as well as the support columns for a shade structure will not result in any increase in flood levels or the volume or velocity of flood flows. As previously discussed, the GPU EIR determined impacts from housing within a 100-year flood hazard area as less than significant with mitigation. The proposed Project would have a less-than-significant impact for the reasons detailed above. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.
- 10(j) The GPU EIR concluded this impact to be less than significant with mitigation. The project does not propose any housing or structures for residential occupancy. The project will result in the placement of fencing and support columns of a shade structure within a designated County of San Diego floodway. A No Rise Certification dated April 23, 2021 prepared by Walsh Engineering & Surveying, Inc. certifies that perimeter fencing for the project as well as the support columns for a shade structure will not result in any increase in flood levels or the volume or velocity of flood flows. Therefore, no structures would be placed within a 100-year flood hazard area which would impede or redirect flood flows.
- 10(k) The GPU EIR concluded this impact to be less than significant with mitigation. The project does not propose any housing or structures for residential occupancy. The project will result in the placement of fencing and support columns of a shade structure within a designated County of San Diego floodway. A No Rise Certification dated April 23, 2021 prepared by Walsh Engineering & Surveying, Inc. certifies that perimeter fencing for the project as well as the support columns for a shade structure will not result in any increase in flood levels or the volume or velocity of flood flows. Additionally, a CEQA Preliminary Drainage Study dated July 2022 prepared by Walsh Engineering & Surveying demonstrates that the project will not result in increased off-site flow of water. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.
- 10(l) The GPU EIR concluded this impact to be less than significant with mitigation. The County Office of Emergency Services maintains Dam Evacuation Plans for each dam operational area. These plans contain information concerning the physical situation, affected jurisdictions, evacuation routes, unique institutions, and event responses. If a “unique

institution” is proposed, such as a hospital, school, or retirement home, within dam inundation area, an amendment to the Dam Evacuation Plan would be required. As previously discussed in response 10(j), the project site lies outside a mapped dam inundation area for a major dam/reservoir within San Diego County.

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

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

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

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

Conclusion

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

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

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

- | | | | |
|---|--------------------------|--------------------------|--------------------------|
| a) Physically divide an established community? | <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

11(a) The GPU EIR concluded this impact to be less than significant with mitigation. The project does not propose the introduction of new infrastructure such as major roadways, water supply systems, or utilities to the area. 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 for roadway widening and improvements to ensure that development of the site would not divide an established community. As previously discussed, the GPU EIR determined impacts from physically dividing an established community as less than significant with mitigation. However, the proposed Project would have a less-than-

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

- 11(b) The GPU EIR concluded this impact to be less than significant. The project site is subject to the Semi-Rural General Plan Regional Category. The western parcel is subject to the Limited Impact Industrial (I-1) Land Use Designations the eastern parcel is subject to the Medium Impact Industrial (I-2) Land Use Designation. The Zoning Use Regulation for the western parcel is Limited Impact Industrial (M52) and the eastern parcel is General Impact Industrial (M54). The Limited Impact Industrial (M52) zone permits all uses associated with the construction yard, warehouse, and office within an enclosed structure in accordance with sections 2520 through 2525 of the Zoning Ordinance. The existing construction yard is permitted within the General Impact Industrial (M54) zone without enclosures in accordance with sections 2540 through 2545 of the Zoning Ordinance. The Site Plan Modification is required in accordance with the "B" Special Area designator for the property for community design review. The project would be consistent with the existing visual character of the project site and views within the community. Uses in the surrounding project vicinity consist of industrial uses located along Olde Highway 80 as well as recreational vehicle (RV) parks. The proposed warehouse and office structure reaches a maximum height of 35 feet and is two stories. The property is subject to a "G" height designator which requires all structures to meet a maximum height of 35 feet and be two stories. The structure will be compatible with the existing structures in the project vicinity as there are structures of comparable bulk and scale such as an over 25,000 square foot warehouse and office structure located approximately 800 feet of the project site. The project also proposes landscaping such as trees within the parking lot in order to comply with the Lakeside Design Guidelines and to assist with screening the on-site structures from public views. The Project is conditioned to be subject to the performance and lighting standards outlined Section 6300 of the Zoning Ordinance in order to prevent light pollution and spill onto adjacent properties as well as prevent the production of noise in excess of levels beyond adopted ordinances. The project is also conditioned to require building permits for unpermitted structures on the site such as a shade structure in the rear of the property of the eastern parcel. Therefore, 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. Therefore, the project would not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project.

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

Conclusion

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

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

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

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

- | | | | |
|---|--------------------------|--------------------------|--------------------------|
| a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

12(a) The GPU EIR determined that impacts to mineral resources would be significant and unavoidable. The California Surface Mining and Reclamation Act (SMARA) required classification of land into Mineral Resource Zones (MRZs). The project site has not been classified by the California Department of Conservation – Division of Mines and Geology (Update of Mineral Land Classification: Aggregate Materials in the Western San Diego Production-Consumption Region, 1997) as an area for known mineral resources. The project site is primarily classified as existing industrial land as well as a vacant industrial-zoned property that previously contained a residential use. The surrounding uses in the project vicinity are industrial uses, commercial uses, residential uses, and recreational vehicle park uses. The eastern parcel of the project site contains a previously permitted construction yard. A future mining operation at the Project site would likely create a significant impact to neighboring properties for issues such as noise, air quality, traffic, and possibly other impacts. 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 has already been lost due to incompatible land uses.

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

12(b) The GPU EIR concluded this impact to be significant and unavoidable. 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). The project site is not located in an area that has MRZ-2 designated lands, nor is it located within 1,500 feet of such lands. The nearest MRZ-2 designated lands are located over a mile and a half northwest of the project site. Therefore, no potentially significant loss of availability of a known mineral resource would occur as a result of the project.

As previously discussed, the GPU EIR determined impacts to mineral resources to be significant and unavoidable. As the project would have a less than significant impact for

the reasons detailed above, the project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

Conclusion

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

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

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
13. Noise – Would the Project:			
a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion

13(a) The GPU EIR concluded this impact to be less than significant with mitigation.

The area surrounding the project site consists of commercial and rural residential uses. The project will not expose people to potentially significant noise levels that exceed the allowable limits of the General Plan, Noise Ordinance, or other applicable standards for the following reasons:

General Plan – Noise Element: Policy 4b addresses noise sensitive areas and requires projects to comply with a Community Noise Equivalent Level (CNEL) of 70 decibels (dBA). Projects which could produce noise in excess of 70 dB(A) are required to incorporate design measures or mitigation as necessary to comply with the Noise Element. Based on a review of the County’s noise contour maps, the project is not expected to expose existing or planned noise sensitive areas to noise in excess of 70 dB(A). The project is located within noise contours of approximately 60 CNEL as identified in the Noise Element of the General Plan. The project does not propose any noise sensitive land uses and would not expose any existing noise sensitive receptors to noise levels that exceeds the County’s noise standards.

Noise Ordinance – Section 36-404: Non-transportation noise generated by the project is not expected to exceed the standards of the Noise Ordinance at or beyond the project’s property line. The project sites are zoned industrial zones. The western parcel is Limited Impact Industrial (M52) and the eastern parcel is General Impact Industrial (M54) that have a one-hour average sound limit of 70 dBA daytime and nighttime. The adjacent properties are also zoned Limited Impact Industrial and General Impact Industrial. The mean one-hour average sound limit at the nearest property line is a sound limit of 70 dBA daytime and nighttime. The proposed project consists of constructing a new warehouse and office for a construction company. The Limited Impact Industrial zone requires all operations of the use to be enclosed and operated within the warehouse and office. Noise sources associated with the project consist of moving of construction equipment and vehicles. The majority of uses associated with the project will be required to be within the warehouse and office. The warehouse and office structure will attenuate noise. Uses on the previously approved eastern parcel will not be expanded and only include additional shade structures for on-site storage. The project does not involve amplified music or noise producing equipment that would exceed applicable noise levels at the adjoining property lines. Therefore, the project complies with Section 36.404 of the Noise Ordinance.

Noise Ordinance – Section 36-410: The project will not generate construction noise in excess of Noise Ordinance standards. Construction operations will occur only during permitted hours of operation. As currently designed, the project does consist of blasting. If any blasting is required, appropriate permits must be obtained from the County Sheriff and additional agencies. It is not anticipated that the project will operate construction equipment in excess of an average sound level of 75 dBA between the hours of 7 AM and 7 PM. Additionally, the project is not expected to generate impulsive noise beyond 85 dBA.

13(b) The GPU EIR concluded this impact to be less than significant with mitigation. The proposed project does not propose residential occupancy, nor does the project propose any major, new, or expanded infrastructure such as highways, or intensive extractive industry that could generate excessive groundborne vibration or groundborne noise levels. The nearest residential uses are located within a recreational vehicle park. Potential groundborne vibrations associated with the project would be minimal and could result in vibrations from movement of construction equipment within the proposed warehouse.

Therefore, the project will not expose persons to or generate excessive groundborne vibration or groundborne noise levels on a project or cumulative level. As previously discussed, the GPU EIR determined impacts to excessive groundborne vibration as less than significant with mitigation. As the proposed Project would have a less-than-significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

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

As indicated in the response listed under Section 13(a), the project is not anticipated expose existing or planned noise sensitive areas in the vicinity to a substantial permanent increase in noise levels that exceed the allowable limits of any applicable noise standards. Also, the project is not expected to expose existing or planned noise sensitive areas to noise 10 dB CNEL over existing ambient noise levels. In accordance with the traffic memo prepared for the project prepared by Urban Systems Associated, Inc dated November 2021, the expanded project is anticipated to generate an additional 80 average daily trips. Based on the limited amount of ADT generated by the project, it is not anticipated that traffic generated by the project will result in large clusters of vehicles that can generate noise.

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

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

As indicated in the response listed under Section 13(a), the project does not involve operational uses that are anticipated to create substantial temporary or periodic increases in ambient noise levels in the project vicinity. In addition, general construction noise is not expected to exceed the construction noise limits of the County of San Diego Noise Ordinance (Section 36.409), which are derived from State regulations to address human health and quality of life concerns. 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 8 hours during a 24-hour period. Operations of the project are required to be enclosed in the warehouse and office in accordance with the zoning use regulation of the warehouse. Therefore, the project would not result in a substantial temporary or periodic increase in existing ambient noise levels in the project vicinity.

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

- 13(e) The GPU EIR concluded this impact to be less than significant with mitigation. The project is not located within an Airport Land Use Compatibility Plan (ALUCP) or within 2 miles of a public airport or public use airport. The nearest airport is Gillespie Field, which is located approximately 7 miles west of the project site.

As previously discussed, the GPU EIR determined impacts from excessive noise exposure from a public or private airport as less than significant with mitigation. As the proposed

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

- 13(f) The GPU EIR concluded this impact to be less than significant with mitigation. The project is not located within a one-mile vicinity of a private airstrip. As previously discussed, the GPU EIR determined impacts from excessive noise exposure from a public or private airport as less than significant with mitigation. As the proposed Project would have a less-than-significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

Conclusion

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

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

14. Population and Housing – Would the Project:

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

Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
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<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

- 14(a) The GPU EIR concluded this impact to be less than significant. The project site is subject to the Limited Impact Industrial (I-1) and Medium Impact Industrial (I-2) General Plan Designations and the Limited Industrial (M52) and General Impact Industrial (M54) and the Zoning Use Regulations which are intended for industrial uses. The project will not induce substantial population growth in an area because the project does not propose any physical or regulatory change that would remove a restriction to or encourage population growth in an area. The project does not include an increase in population as it consists of

an industrial use in the construction of a storage warehouse and office for a construction company operation.

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

- 14(b) The GPU EIR concluded this impact to be less than significant. The project will not displace existing housing as the project involves the expansion of a construction yard operation to include a storage warehouse and office on a property that does not have any existing residential uses. The western parcel previously contained a residential structure that was removed under demolition permit Record ID: PDS2016-RESALT-006162. No occupied residential structures or housing are proposed to be removed as part of the project.

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

- 14(c) The GPU EIR concluded this impact to be less than significant. As indicated in response 14(b), the project will not displace existing housing as the project involves expansion of a construction yard operation to include a storage warehouse and office on a property that does not have any existing residential uses. The western parcel previously contained a residential structure that was removed under demolition permit Record ID: PDS2016-RESALT-006162. No occupied residential structures or housing are proposed to be removed as part of the project.

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

Conclusion

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

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

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

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

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

15(a) The GPU EIR concluded this impact to be less than significant with mitigation for the exception of school services, which remained significant and unavoidable. The project is a Site Plan Modification is on an approximately 5.07-acre project site consisting of two adjacent parcels in order to expand an existing construction yard as well as construct an approximately 20,000 square foot warehouse with 10,000 square feet of office in two stories. The eastern parcel is developed with existing office structures, accessory structures, and a shade structure which are proposed to be retained and have been served by an on-site wastewater treatment system. Water, sewer, and fire service availability forms have been provided for the project. Water service is proposed to be provided by Padre Dam Municipal Water District as detailed in the service availability form dated September 2023. Fire service is proposed to be provided by the Lakeside Fire Protection District as detailed in the service availability form dated September 2023. Sewer service for the expansion is proposed to be provided by the San Diego County Sanitation District in the Lakeside Service Area as detailed in the service availability form dated September 2023. The project will require annexation into the applicable sewer district upon coordination with the Local Agency Formation Commission (LAFCO). The project is located within the Sphere of Influence boundary of the sewer district and nearby properties have been annexed into the San Diego County Sanitation District in the Lakeside Service Area. The proposed project does not contain residential uses which require adequate school services and recreational facilities. The project does not include construction of new or altered public service facilities including but not limited to fire protection facilities, sheriff facilities, schools, or parks in order to maintain acceptable service ratios, response times, or other performance objects for public services. The proposed development is consistent with the General Plan projections and Land Use regulations, therefore, service ratios for public services associated with the project were analyzed within the GPU EIR and the project is not anticipated to require additional services. Based on the project’s service availability forms, the project would not result in the need for significantly altered services or facilities.

Conclusion

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

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

3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. Feasible mitigation measures from the GPU EIR (Pub-1.1 and Pub-3.2) would be applied to the project. This mitigation measures, as detailed above, requires the County to participate in interjurisdictional and interagency reviews and for the project to conform to Board Policy I-84, which requires project Facility Availability and Commitment for Public Sewer, Water, School and Fire Services.

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

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

<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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Discussion

16(a) The GPU EIR concluded this impact to be less than significant with mitigation. The Project does not propose any residential uses, including but not limited to a residential subdivision, mobile home park, or construction for a single-family residence that may increase the use of existing neighborhood and regional parks or other recreational facilities in the vicinity. No impact to parks or recreation facilities would occur as a result of the Project as it consists of a construction yard and storage warehouse.

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

16(b) The GPU EIR concluded this impact to be less than significant with mitigation. The Project does not include recreational facilities or require the construction or expansion of recreational facilities such as parks. As previously discussed, the GPU EIR determined impacts related to construction of new recreational facilities to be less than significant. As the proposed Project would have a less than significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

Conclusion

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

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

- 3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
- 4. No mitigation measures contained within the GPU EIR would be required because Project specific impacts would be less than significant.

Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
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17. Transportation and Traffic – Would the Project:

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

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

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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e) Result in inadequate emergency access?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

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

17(a) The GPU EIR concluded this impact to be significant and unavoidable. The County of San Diego Transportation Study Guidelines have been adopted by the County Board of Supervisors in September of 2022 to address Senate Bill 743 (SB 743). SB 743 changed the way that public agencies evaluate transportation impacts under CEQA. A key element of this law is the elimination of using auto delay, Level of Service (LOS), and other similar measures of vehicular capacity or traffic congestion as a basis for determining significant transportation impacts under CEQA. The new established criteria for determining the significance of transportation impacts is Vehicle Miles Traveled (VMT) and is further

addressed below. Although no longer utilized as the standard for evaluating transportation impacts under CEQA, the County's General Plan identified LOS as being a required analysis per Policy M-2.1 and is therefore also addressed.

Section 15064.3 of the CEQA Guidelines details new regulations, effective statewide July 1, 2020, based on SB 743 that sets forth specific considerations for evaluating a project's transportation impacts. As previously discussed, the new established criteria for determining the significance of transportation impacts is Vehicle Miles Traveled (VMT). VMT refers to the amount and distance of automobile travel attributable to a project. The project is a Site Plan Modification is on an approximately 5.07-acre project site consisting of two adjacent parcels in order to expand an existing construction yard as well as construct an approximately 20,000 square foot warehouse with 10,000 square feet of office in two stories. The eastern parcel is developed with existing office structures, accessory structures, and a shade structure which are proposed to be retained. 60 new parking spaces are proposed on the western parcel to serve the proposed warehouse and offices and 18 parking spaces will be retained on the eastern parcel. Access would be provided by two driveways on the eastern parcel connecting to Olde Highway 80 and a single driveway on the western parcel connecting to Olde Highway 80. Earthwork will consist of a balanced site of 10,000 cubic yards of cut and fill of material. In accordance with the traffic analysis prepared for the project by Urban Systems Associates, Inc dated November 23, 2021, the project is anticipated to generate 80 additional average daily trips. As detailed in the traffic analysis, the proposed offices and warehouse are intended to consolidate existing operations of the A.M. Ortega Construction company in the Lakeside area. The existing operations on the project site consist of ongoing construction equipment storage that have been generating trips since approval of the original Site Plan on the eastern property. In accordance with the adopted Transportation Study Guidelines, the project meets the CEQA VMT screening criteria for projects generating less than 110 average daily trips (ADT) and will not result in a significant VMT impact. Additionally, the Governor's Office of Planning and Research Technical Advisory on Evaluating Transportation Impacts in CEQA dated December 2018 includes an analysis that many agencies have chosen to adopt screening thresholds of 110 ADT as a small project screening threshold in order to determine if a project would not lead to a significant transportation/traffic impact associated with VMT. Because the project is anticipated to generate 80 ADT which is less than the 110 ADT small project screening threshold contemplated in the December 2018 Technical Advisory, the project would not lead to a significant transportation/traffic impact associated with VMT.

The project is demonstrating conformance with CEQA in accordance with CEQA Section 15183. The General Plan EIR contains implementation of the Transportation Impact Fee (TIF) as an overall programmatic solution that addresses existing and projected future road deficiencies in the unincorporated portion of San Diego County. The TIF program creates a mechanism to proportionally fund improvements to roadways necessary to mitigate potential cumulative impacts caused by traffic from future development. The potential growth represented by this project was included in the growth projections upon which the TIF program is based. The TIF measures was identified by the GPU EIR as Tra-1.7.

A Local Mobility Analysis is the tool utilized by the Transportation Study Guidelines to assess projects impacts to LOS. However, the Transportation Study Guidelines have also adopted thresholds for determining when a project must prepare a Local Mobility Analysis based on project type and number of trips. The project is consistent with the County General plan and would not result in more than 250 ADT. In accordance with the

Transportation Study Guidelines, a Local Mobility Analysis was not required for the project. Therefore, the project would not conflict with an applicable plan, ordinance or policy related to local mobility.

As previously discussed, the GPU EIR determined significant and unavoidable impacts to unincorporated County traffic and LOS standards. However, the project would have a less than significant impact to County traffic and LOS standards as well as VMT with the incorporation of mitigation as detailed above. The measures were identified in the GPU EIR as Tra-1.7 and Tra-6.9 which require payment into the County TIF program as well as implementation of the County Subdivision Ordinance and the Community Trails Master Plan. In addition, the project would not conflict with SB 743 because it is anticipated to generate 80 ADT and is below the County's adopted small project screening threshold of 110 ADT and the small project screening threshold of 110 ADT contemplated in the December 2018 Technical Advisory. Therefore, the project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

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

As previously stated, Section 15064.3 of the CEQA Guidelines details new regulations, effective statewide July 1, 2020 that sets forth specific considerations for evaluating a project's transportation impacts. As discussed in 17(a), the project would result in a less than significant impact associated with VMT. As discussed in 17(a), the project is conditioned for the installation of a driveway, processing of Centerline Review, and maintenance of adequate sight distance. The project will require the preparation of a haul route plan and a traffic control plan in order minimized temporary traffic impacts during grading and construction activities. Therefore, the project would not conflict with an applicable congestion management program.

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

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

- 17(d) The GPU EIR concluded this impact to be significant and unavoidable. The proposed Project would not substantially 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 project proposes to utilize three driveways connecting to Olde Highway 80. The project will be conditioned to maintain

adequate unobstructed sight distance for the driveways. Olde Highway 80 located along the project frontage is primarily linear and does not contain curves or bends. The project will not require substantial road improvements to Olde Highway 80 that could alter the alignment of the road. Therefore, 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.

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

- 17(e) The GPU EIR concluded this impact to be less than significant with mitigation. The proposed project will not result in inadequate emergency access. The project is not served by a dead-end road that exceeds the maximum cumulative length permitted by the San Diego County Consolidated Fire Code. A fire service availability form from the Lakeside Fire Protection District has been prepared and submitted for the project. In addition, consistent with GPU EIR mitigation measure Tra-4.2, the Project would implement the Building and Fire codes to ensure emergency vehicle accessibility.

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

- 17(f) The GPU EIR concluded this impact to be less than significant with mitigation. The Project would not result in the construction of any road improvements or new road design features that would interfere with the provision of public transit, bicycle or pedestrian facilities. In addition, the Project does not generate sufficient travel demand to increase demand for transit, pedestrian or bicycle facilities. As discussed in 17(a) the project is conditioned for Centerline Review in accordance with the County of San Diego Public Road Standards. Lastly, the project includes the installation of bike racks in order to comply with parking standards.

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

Conclusion

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

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

5. Feasible measures contained within the GPU EIR (Tra-1.4, Tra-1.7, and Tra-4.2, and) would be applied to the project. The mitigation measures, as detailed above, would require payment into the County TIF Program as well as consistency with the Building Code, Fire Code, and County Public Road Standards.

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

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

Discussion

18(a) The GPU EIR concluded this impact to be less than significant with mitigation. The Project would discharge domestic waste to a community sewer system that is permitted to operate by the Regional Water Quality Control Board (RWQCB). The eastern parcel is developed with existing office structures, accessory structures, and a shade structure which are proposed to be retained and have been served by an on-site wastewater treatment system. Sewer service for the expansion is proposed to be provided by the San Diego County Sanitation District in the Lakeside Service Area as detailed in the service availability form dated September 2023. The project will require annexation into the applicable sewer district upon coordination with the Local Agency Formation Commission (LAFCO). The project is located within the Sphere of Influence boundary of the sewer

district and nearby properties have been annexed into the San Diego County Sanitation District in the Lakeside Service Area.

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

- 18(b) The GPU EIR concluded this impact to be less than significant with mitigation. The Project involves new water and wastewater pipeline extensions. However, these extensions would be on-site or within adjacent public roads and would not result in additional adverse physical effects beyond those already identified in other sections of this environmental analysis. Water and sewer service availability forms from the Padre Dam Municipal Water District and the San Diego County Sanitation District in the Lakeside Service area dated September 2023 have been provided for the project. Additional analysis for sewer service is included in response 18(a).

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

- 18(c) The GPU EIR concluded this impact to be less than significant with mitigation. The project involves stormwater facilities in the form of construction/temporary BMPs as well as site design BMPs in the form of an on-site biofiltration basin. All drainage facilities and equipment will be constructed on-site. A CEQA Preliminary Drainage Study dated July 2022 prepared by Walsh Engineering & Surveying demonstrates that the project will not result in increased off-site flow of water. All stormwater and drainage facilities are required to comply with RWQCB requirements in accordance with the Municipal Separate Storm Sewer System (MS4) permit.

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

- 18(d) The GPU EIR concluded this impact to be significant and unavoidable. Water service for the project will be provided by the Padre Dam Municipal Water District as detailed in the service availability letter for the project dated September 2023.

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

- 18(f) The GPU EIR concluded this impact to be less than significant. 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. Therefore, the project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

18(g) The GPU EIR concluded this impact to be less than significant. The project would deposit all solid waste at a permitted solid waste facility. Therefore, the project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

Conclusion

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

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

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

Discussion

Wildfire was analyzed within the GPU EIR within Section 2.7, Hazards and Hazardous Materials. The guidelines for determining significance stated: the proposed General Plan Update would have a significant impact if it would expose people or structures to a significant risk of loss, injury, or

death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands. In 2019, the issue of Wildfire was separated into its own section within Appendix G of the CEQA Guidelines to incorporate the four issue questions above. The GPU EIR did address these issues within the analysis; however they were not called out as separate issue areas. Within the GPU EIR, the issue of Wildland Fires was determined to be significant and unavoidable.

- 19(a) The GPU EIR concluded this impact to be significant and unavoidable. The site is located within a very high fire hazard severity zone (FHSZ). The Project site is within the Lakeside Fire Protection District and is located approximately less than half of a mile south of the nearest fire station. A Fire Service Availability Form dated September 2023 has been provided for the project. Based on a review by County Staff of GIS Aerial Imagery, the site would have an Emergency Response Travel Time of 2 minutes, which meets the General Plan Safety Element standard for lands designated as Industrial within the Semi-Rural Regional Category of 10 minutes.

As previously stated, Wildfire was analyzed within the GPU EIR within Section 2.7, Hazards and Hazardous Materials and was determined to be significant and unavoidable. However, the proposed Project would have a less-than-significant impact for the reasons detailed above. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 19(b) The GPU EIR concluded this impact to be significant and unavoidable. The Project is within a very high fire hazard severity zone and within the Urban-Wildlife Interface Zone. The Project would comply with regulations relating to emergency access, water supply, and defensible space specified in the County Fire Code and Consolidated Fire Code. Implementation of these fire safety standards would occur during the building permit process and is consistent with GPU mitigation measures Haz-4.2 and Haz-4.3. In addition, the Project is consistent with the Zoning Ordinance and the County of San Diego General Plan. The project is conditioned to have the Lakeside Fire Protection District review the building permits for the project in order to ensure that the project will comply with the County Consolidated Fire Code. Therefore, for the reasons stated above, the Project would not be expected to experience exacerbated wildfire risks due to slope, prevailing, winds or other factors.

As previously stated, Wildfire was analyzed within the GPU EIR within Section 2.7, Hazards and Hazardous Materials and was determined to be significant and unavoidable. However, the proposed Project would have a less-than-significant impact for the reasons detailed above. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 19(c) The GPU EIR concluded this impact to be significant and unavoidable. The GPU EIR concluded this impact to be significant and unavoidable. The project would require the installation and maintenance three driveways located along the frontage of the three parcels and includes an on-site hammerhead turnaround. No major road improvements or extensions of roadways are required for the construction and operation of the use. Therefore, no additional temporary or ongoing impacts to the environment related to associated infrastructure would occur that have not been analyzed in other sections of this environmental document.

- 19(d) The GPU EIR concluded this impact to be significant and unavoidable. As stated in response 10(f), the drainage study concluded the project would not alter existing drainage

patterns onsite in a manner which would result in flooding on or offsite. In addition, as stated in responses 10(i) and 10(j), construction associated with the project will not be not be impacted from downstream flooding. In addition, the project would not develop any steep slopes. Therefore, the project would not expose people or structures to a significant risk, including downslopes or downstream flooding or landslides, as a result of runoff, post-fire instability, or drainage changes.

As previously discussed, the GPU EIR determined impacts from Wildfire to be significant and unavoidable. The GPU EIR measure Haz-4.3 requires compliance with the Building and Fire Code and the project has incorporated the GPU EIR Mitigation Measure Haz-4.2 for brush management as a standard project design feature. Therefore, the project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

Conclusion

The GPU EIR concluded significant and unavoidable impacts associated with wildfire under Section 2.7, Hazards and Hazardous Materials. Based on the incorporation of project design features measures, impacts associated with wildfire would be less than significant. Therefore, the project would not exacerbate wildfire risks and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire.

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

1. No peculiar impacts to the Project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. Feasible mitigation measures incorporated as standard design features associated with the project contained within the GPU EIR (Haz-4.2 and Haz-4.3) would be applied to the Project. These measures, as detailed above, requires the Project applicant to implement brush management and comply with the building and fire codes.

Attachments:

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:

Air Quality and Greenhouse Gas

Air Quality and Greenhouse Gas Technical Study, BlueScape Environmental, May 2, 2023
Bay Area Air Quality Management District, Justification Report: CEQA Thresholds for Evaluating the Significance of Climate Impacts From Land Use Projects and Plans, Bay Area Air Quality Management District and Ascent Environmental, April 2022

Biological Resources:

Biological Resources, Project Impacts, and Proposed Mitigation, The Ortega Construction Yard Project, Vincent N. Scheidt, May 2023

Hydrology/Water Quality:

No Rise Certification, Walsh Engineering & Surveying, Inc., April 23, 2021
Priority Development Project Stormwater Quality Management Plan (SWQMP), Walsh Engineering & Surveying, Inc., July 22, 2022
CEQA Preliminary Drainage Study for Olde Highway 80, Walsh Engineering & Surveying, Inc., July 21, 2022

Service Availability Forms:

San Diego County Sanitation District – Lakeside Service Area Project Facility Availability – Sewer dated September 20, 2023
Lakeside Fire Protection District Project Facility Availability – Fire dated September 7, 2023
Padre Dam Municipal Water District – Project Facility Availability – Water September 20, 2023

Traffic and Transportation:

Ortega Construction Yard Olde Highway 80 Transportation Memo, Urban Systems Associates, Inc., November 23, 2021

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 websites at:

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

<https://www.sandiegocounty.gov/content/sdc/pds/generalplan/GP-EIR.html#EIR>

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