

CHAPTER 1.0 – PURPOSE AND NEED, SCOPE AND ORGANIZATION

1.1 Introduction

This Environmental Impact Report (EIR) evaluates the potential environmental impacts of approval of a Specific Plan Amendment (SPA), Major Use Permit (MUP), Reclamation Plan, and Boundary Adjustment for the Otay Hills Construction Aggregate and Inert Debris Engineered Fill Operation (IDEFO) (hereinafter referred to as “Proposed Project” or “Project”) within the unincorporated community of East Otay Mesa in south San Diego County (Figure 1-1, *Regional Location* and Figure 2-2, *Aerial Photograph*). The full duration of the Proposed Project would be approximately 120 years and would include site preparation, extraction and processing of construction aggregate, backfilling the pit with inert debris (i.e., IDEFO), and reclamation of the extraction areas.

The alternatives evaluated in this EIR include two project/action alternatives: Extraction to Natural Grade Alternative and Extraction to Varying Depths Alternative. A No Project Alternative is also evaluated.

1.2 Purpose of this EIR

This EIR has been prepared in compliance with CEQA (California Public Resources Code [PRC] Section 21000 et seq.) as implemented by the CEQA Guidelines (California Code of Regulations [CCR], Title 14, Division 6, Chapter 3, Sections 15000-15387). The Project would require approval and adoption of a SPA, MUP, Reclamation Plan, and Boundary Adjustment, as well as the issuance of an amended incidental take permit (ITP) under Section 10(a)(1)(B) of the Federal Endangered Species Act (ESA). The County has prepared this EIR to inform the public of the potential environmental effects of the Proposed Project, seek comments from the public, and to present the information collected and analyzed to County decision-makers to make informed decisions concerning the SPA, MUP, Reclamation Plan, and Boundary Adjustment.

1.3 Background Information

Implementation of the Project would require a major amendment to the Multiple Species Conservation Program (MSCP) County Subarea Plan (Subarea Plan). On March 17, 1998, the U.S. Fish and Wildlife Service (USFWS) issued a section 10(a)(1)(B) permit (PRT-840414) pursuant to the Federal ESA, as amended (16 U.S.C. 1531 *et seq.*) for the Subarea Plan. The California Department of Fish and Wildlife (CDFW) also issued Natural Community Conservation Plan Approval and Take Authorization per Section 2800 *et seq.*, of the California Fish and Game Code. The Subarea Plan and associated Implementing Agreement and permits with the USFWS and CDFW (collectively referred to as the Wildlife Agencies) establish the conditions under which the County receives take authorizations for 85 Covered Species incidental to land development and other lawful land uses that are authorized by the County and are covered by the permits (i.e., covered activities). The Biological Mitigation Ordinance (BMO) is the implementing ordinance for the Subarea Plan. Compliance with this ordinance allows the County to issue ITPs.

The Subarea Plan is divided into three segments. Within the South County Segment, certain lands were designated as “Major or Minor Amendment” areas where the location of the preservation and

development was not resolved prior to permit issuance. For lands designated as “Major or Minor Amendment” areas, the County's take authorizations do not apply until the major or minor amendment process has been completed. The Proposed Project occurs within both “Major and Minor Amendment” areas. Thus, the County is requesting an amendment to their Subarea Plan and has reviewed the Habitat Conservation Plan for the Otay Hills Project: Major Amendment to the Multiple Species Conservation Program County of San Diego Subarea Plan (Otay Hills HCP) to address certain MSCP Covered Species that occur within the proposed project site and the federally listed quino checkerspot butterfly (QCB). All major and minor amendments must conform to the MSCP and Subarea Plan requirements, and requests for amendments must be processed by the Wildlife Agencies in conformity with all applicable laws and regulations including the National Environmental Policy Act (NEPA), CEQA, the Federal ESA and State of California ESA in effect at the time the request for an amendment is received.

The Project site is located within portions of ten parcels (Assessor's Parcel Numbers [APNs] 648-050- 12 (por), 13 (por), 14, 17 (por); 648-080-13, 14 (por) and 25 (por); and 648-040-39 (por), 40 and 55 (por) that total approximately 410 acres. Figure 1-3, *Project Location – USGS Quadrangle Map*, shows the Project's boundaries on the Otay Mesa topographic quadrangle.

The Project site is located in the East Otay Mesa Specific Plan (EOMSP) area of the County. The County Board of Supervisors certified the Final EIR for the EOMSP (Specific Plan [SP] 93-004; General Plan Amendment [GPA] 94-02; Log No. 93-19-6) on July 27, 1994. The EOMSP encompasses an area of approximately 3,300 unincorporated acres in the southwestern portion of San Diego County, adjacent to the United States (U.S.)-Mexico international border. The EOMSP area adjoins the City of San Diego's (City's) Otay Mesa Community Plan Area. The original EOMSP designated approximately 72 percent of the land area within its boundaries as a Mixed Industrial zone, and approximately 23 percent as a Rural Residential zone. The EOMSP allows certain interim uses (e.g., agricultural services; automotive and equipment; storage of vehicles, recreational vehicles, boats, etc.) with issuance of an MUP, provided that the land is returned to its original land use designation at the end of the period of MUP implementation.

The EOMSP Final EIR found significant effects from plan implementation to biological resources, noise, land use, landform alteration/visual quality, cultural resources, geology and soils, hydrology and water quality, transportation and circulation, air quality, health and safety, public services and utilities, and population/housing/employment. With the exceptions of biological resources and noise, it was determined that these effects could be avoided or mitigated to less-than-significant levels through implementation of adopted mitigation measures. A Statement of Overriding Considerations was adopted for significant and unmitigable impacts to biological resources and noise.

In the years since certification of the original EOMSP EIR, 21 addenda, 16 projects with reliance on the previous EIR unmodified, and three Supplemental EIRs have been processed and approved by the County. Eight amendments have been approved by the Board of Supervisors since the 1994 adoption of the plan; the most significant amendments to the plan have been three County-initiated SPAs. An amendment, approved in 2002, divided the EOMSP into two subareas, designating the western portion (approximately 2,017 acres) as Subarea 1 and the eastern portion (approximately 1,283 acres) as Subarea 2. At the same time, the 2002 SPA modified the land use categories in Subarea 1, including changing the Commercial and Mixed Industrial land use designations to

Technology Business Park, Light Industrial and Heavy Industrial, and modifying the Rural Residential designation to Conservation/Limited Use. A County-initiated SPA, approved on August 1, 2007, addressed both subareas and revised the circulation plan, bicycle network, and regulatory standards relating to site plan requirements, fencing detail, driveway location criteria, and sidewalk design. The 2007 amendment also modified noise requirements for Subarea 2 to make them consistent with those of Subarea 1 (as discussed in Subchapter 3.5, *Noise*). In April 2009, the County modified the plan to correct minor issues related to landscape requirements for public roads, modify the land use plan for the Heavy Industrial area, and define development standards for correctional facilities in Heavy Industrial, among other items. SPA 10-001 was approved by the Board of Supervisors on September 15, 2010. This SPA removed inconsistencies between Subareas 1 and 2 and combined the two subareas; modified streetscape, public right-of-way and landscape requirements; and allowed the use of chain link and decomposed granite surface for interim uses on the State Route 11 (SR 11) right-of-way. In addition, the SPA included a Zone Reclassification (REZ 10-001) that modified the boundary of the EOMSP area in response to Proposition A, the East Otay Mesa Recycling Collection Center and Landfill Ordinance, and rezoned approximately 33 acres of land from S-88 to RS-40 to accommodate a future solid waste facility east of the EOMSP area. The SPA also specified that a 1,000-foot Landfill Overlay Buffer be established around the landfill site to prevent land use conflicts. The Project is located within the area formerly known as Subarea 2. The eighth amendment to the Specific Plan (SPA 14-002) was approved by the Board of Supervisors on April 22, 2015. This amendment deleted the segment of Airway Road between Alta Road and Siempre Viva Road.

The County General Plan and the EOMSP govern allowable land uses on the site. The primary land use goal of the EOMSP is to promote the development of the area into a comprehensive industrial and business district. The EOMSP provides land use regulations, which are zoning equivalents, for each of the land use categories. These regulations identify allowable land uses and development standards. Uses within Mixed Industrial allow a wide range of commercial and industrial use, while uses within Rural Residential are limited in scope. Extractive uses are permitted only in the Rural Residential and Mixed Industrial designations (within the area formerly known as Subarea 2), if an MUP is obtained and the use conforms to the Specific Plan.

Heavy and Mixed Industrial uses, along with a small area designated District Commercial are planned for the eastern portion of the EOMSP. The far eastern portion of the EOMSP, including a large portion of the Project site, is designated Rural Residential, which allows low density residential development (1 dwelling unit [du] per 20 acres) due to the occurrence of steep slopes and sensitive biological resources. Development in the residential designated areas may only proceed following detailed environmental review, approval of a Resource Conservation Plan (as required by the EOMSP), and site plan review. Areas designated as Rural Residential would require a Major Amendment to the MSCP.

An Initial Study was completed by the County for the Proposed Project on May 18, 2005, at which time Planning and Development Services (PDS) concluded that an EIR would be necessary. It was decided that an EIR, not a Supplemental EIR, was the appropriate CEQA document given that interim uses (such as the Proposed Project) were included but not analyzed as part of the EOMSP Final EIR. On May 26, 2005, the Notice of Preparation (NOP) of an EIR was published and the Initial Study and NOP were distributed by the County to the State Clearinghouse (SCH), responsible agencies and interested citizens and community groups for a 30-day public review

period, pursuant to CEQA Guidelines. A Public Scoping Meeting was held on June 16, 2005 at the County. Nine letters were received in response to the NOP. Appendix A1 includes the initial NOP prepared in 1985 in its entirety and the related comment letters.

Concerns were expressed by County staff and the Wildlife Agencies regarding the Project footprint and potential biological impacts. The Project Proponent has spent several years working with County staff and Wildlife Agencies on an adequate biological mitigation strategy to address sensitive biological habitat on the Project site. Numerous meetings have been held with County staff, Wildlife Agencies and the Project Proponent between 2005 and 2010 to address these concerns. The Project Proponent worked with County staff to revise the footprint, which resulted in a reduced mining impact footprint of approximately 100 acres. A SPA application was resubmitted to the County on November 19, 2010. Following review of the SPA application, the County determined that a new NOP should be prepared because substantial changes were made to the Project since the initial NOP dated May 26, 2005. Appendix A2 includes the 2011 NOP in its entirety and the related comment letters. Seven letters were received in response to the 2011 NOP. In addition, a new NOP was also required because a joint EIR/EIS was contemplated for this Project in cooperation with the USFWS to address the environmental effects associated with an ITP under Section 10(a)(1)(B) of the ESA. Since that time, it was decided to separate the Federal Action and address it in a stand-alone Environmental Assessment (EA) prepared in accordance with NEPA.

1.3.1 California Natural Community Conservation Planning Act and Multiple Species Conservation Program

The Natural Community Conservation Planning (NCCP) program is a cooperative effort to protect habitats and species. It began under the State's NCCP Act of 1991, legislation broader in its orientation and objectives than the California and Federal ESAs. These laws are designed to identify and protect individual species that have already declined in number significantly. The NCCP Act of 1991 and the associated Southern California Coastal Sage Scrub NCCP Process Guidelines (1993), Southern California Coastal Sage Scrub NCCP Conservation Guidelines (1993) and NCCP General Process Guidelines (1998) have been superseded by the NCCP Act of 2003.

The primary objective of the NCCP program is to conserve natural communities at the ecosystem level while accommodating compatible land use. The program seeks to anticipate and prevent the controversies and gridlock caused by species' listings by focusing on the long-term stability of wildlife and plant communities and including key interests in the process.

This voluntary program allows the State to enter into planning agreements with landowners, local governments, and other stakeholders to prepare plans that identify the most important areas for a threatened or endangered species, and the areas that may be less important. These NCCP plans may become the basis for a State permit to take threatened and endangered species in exchange for conserving their habitat. The resource agencies worked to combine the NCCP program with the Federal HCP process to provide take permits for State and Federal listed species. Under the NCCP, local governments, such as the County, can take the lead in developing these NCCP plans and become the recipients of State and Federal incidental take permits.

To meet the requirements of the NCCP and Federal ESA, local jurisdictions participated in preparation of the MSCP. The MSCP is a long-term habitat conservation program for the region of southwestern San Diego County. The main goal of the MSCP is to establish a network of viable habitat and open space to protect biodiversity and sensitive species while allowing for smart growth. One of the primary objectives of the MSCP is to identify and maintain a preserve system that allows for animals and plants to exist at both the local and regional levels. Local jurisdictions, including the County, implement their portions of the regional MSCP through local subarea plans that describe specific MSCP implementing mechanisms within their respective jurisdictions. The USFWS Section 10 permit (PRT-840414) and the State's NCCP permit for the Subarea Plan (County 1997) authorize take for 85 specific species (i.e., MSCP Covered Species; USFWS and CDFW 1998).

1.4 Goals and Objectives of the Proposed Project

The goal of the Project is the establishment of a mineral resource recovery operation and associated activities to create much-needed construction aggregates and materials to serve the economy of San Diego County for an approximate 90+-year period. During and after mineral resource recovery operations, the open pit would serve as a receiver site for inert debris such as concrete, asphalt, rock and soil.

The overall objectives of the Project are to:

- Secure permits for a long-term, dependable source of high quality aggregate located close enough to high development areas in the South County region, including the City of San Diego, the City of Chula Vista, and the unincorporated community of East Otay Mesa, in order to feasibly serve these areas.
- Establish an on-site processing plant in order to achieve maximum possible operational efficiency.
- Provide aggregate material to southern San Diego County, where it has been determined by the San Diego Association of Governments (SANDAG) that there is a significant shortfall of permitted, long-term aggregate reserves (2011a).
- Provide an IDEFO for debris such as concrete, asphalt, rock and soil.
- Return extracted areas to a useful purpose following depletion of mineral resources.
- Ensure compliance with the California NCCP Act and the California ESA.
- Provide conservation for the MSCP covered species and the QCB through conservation of a portion of the Project site to be managed in accordance with the Resource Management Plan (RMP) approved by the County and Wildlife Agencies.

1.5 Scope and Intent of this EIR

1.5.1 Scoping Process

As discussed in subsection 1.1.3, an Initial Study was completed by the County for the Proposed Project on May 18, 2005, at which time PDS concluded that an EIR would be necessary. On May 26, 2005, the NOP of an EIR was published and the Initial Study and NOP were distributed by the County to the SCH, responsible agencies and interested citizens and community groups for a 30-day public review period, pursuant to CEQA Guidelines. A Public Scoping Meeting was held on June 16, 2005 at the County. Nine letters were received in response to the NOP. Appendix A1 includes the initial NOP in its entirety and the related comment letters.

A SPA application was resubmitted to the County on November 19, 2010. Following review of the SPA application, the County determined that a new NOP should be prepared because substantial changes were made to the Project since the initial NOP dated May 26, 2005. In addition, a new NOP was also required because a joint EIR/EIS was contemplated for this Project in cooperation with the USFWS to address the environmental effects associated with an ITP under Section 10(a)(1)(B) of the ESA. An Initial Study was completed by the County for the revised Project on January 5, 2011. The resource areas potentially affected by the Proposed Project included land use and planning/community character, aesthetics, hazards, utilities/service systems, hydrology/water quality, geology/soils, noise, cultural resources, air quality, transportation/circulation, biological resources, greenhouse gas emissions, and public services. On March 17, 2011, the NOP for an EIR/EIS was published, and the Initial Study and NOP were distributed by the County to the SCH, responsible agencies and interested citizens and community groups for a 30-day public review period, pursuant to CEQA Guidelines. A Public Scoping Meeting was held on March 30, 2011 at the County. Six letters were received in response to the NOP. Appendix A2 includes the NOP dated March 17, 2011 in its entirety and the related comment letters.

The USFWS issued a Notice of Intent (NOI) in the Federal Register on August 18, 2014 for a 30-day review period, pursuant to NEPA requirements. Two letters were received in response to the NOI. Appendix A3 includes the NOI in its entirety and the related comment letters.

Based upon a preliminary analysis, USFWS has determined that their action would not result in significant impacts to the human environment under NEPA. Therefore, they anticipate going forward with a separate Environmental Assessment and Finding of No Significant Impact, for the issuance of an Incidental Take Permit under Section 10 of the Federal ESA.

1.5.2 Project Approvals and Permits

This environmental analysis has been prepared to support the discretionary actions and approvals necessary for the implementation of the Proposed Project. The Project would require a number of approvals and permits, as listed below and shown in Table 1-1, *Required Permits*.

1.5.3 Decisions to be Made

This EIR is an informational document which has been prepared to: (1) inform public agency decision-makers and the public of the potential for significant environmental impacts as a result of the Proposed Project; (2) identify mitigation measures that would reduce Project impacts; and

(3) identify alternatives that would reduce or avoid potentially significant impacts. The County decision-makers will consider the information in this EIR.

1.5.3.1 U.S. Fish and Wildlife Service

The USFWS will prepare an EA which will consider the proposed Major Amendment to determine if the Amendment can be issued consistent with the Federal ESA.

Federal ESA Section 10(a)(2)(B) requires that specific permit issuance criteria be met before USFWS may issue ITPs.

1.5.3.2 California Department of Fish and Wildlife

The CDFW, as a responsible agency under CEQA, shall use this EIR to determine whether to issue or deny incidental take authorization under Section 2835 of the NCCP Act, and utilize the provisions in the Act when determining stream avoidance and impact minimization measures and compensatory mitigation when administering Section 1600 et. seq. of the California Fish and Game Code.

1.5.3.3 County of San Diego

The County, as the lead agency for the Project under CEQA, must make findings for each of the significant impacts identified in the EIR, and if appropriate, prepare a Statement of Overriding Considerations if mitigation presented does not reduce impacts to less than significant levels. The County must determine whether to certify the EIR, approve the SPA, MUP, Reclamation Plan, and Boundary Adjustment, and adopt the Major Amendment to the Subarea Plan.

1.5.4 Project Inconsistencies with Applicable Regional and General Plans

A number of general and regional plans apply to this Project and were considered during the Project Proponent's preparation of the Reclamation Plan. In particular, the County General Plan (GP), EOMSP and Subarea Plan were reviewed for all applicable designations, goals, and policies. Other plans and regulations were reviewed, including: the state and Federal ESAs, the Clean Water Act (CWA), the State Implementation Plan (SIP) and the San Diego Air Pollution Control District (APCD) Regional Air Quality Strategy (RAQS), the County's Resource Protection Ordinance (RPO), the Water Quality Control Plan for the San Diego Basin (Basin Plan) and SANDAG's Congestion Management Plan. Specific County regulations include the BMO, the Noise Ordinance and the Light Pollution Code (LPC)/Dark Sky Ordinance. The Project's compliance or non-compliance, with these plans and ordinances is evaluated throughout the EIR, with discussions in Chapter 4.0, *Environmental Impacts/Environmental Consequences and Mitigation*.

The RPO (effective October 10, 1991 and revised effective April 18, 2007), provides development controls for unique resources within the County deemed to be fragile, irreplaceable and vital to the general welfare of the County's residents. The resources protected by the County include: wetlands, floodplains/floodways, steep slopes, sensitive biological habitats and certain prehistoric and historic sites. The RPO requires that prior to approval of certain discretionary permits, a Resource Protection Study be completed and findings made relative to compliance with the provisions of the RPO. Pursuant to Section 86.605(d)(3) of the RPO, sand, gravel, or mineral

extraction projects (such as the Proposed Project) would be exempt from RPO requirements provided that certain mitigation measures regarding restoration/revegetation are implemented as a condition of the MUP.

The Proposed Project is generally consistent with all of the above-named plans and ordinances, with the exception of the Subarea Plan. Although located within the Subarea Plan, the County's Section 10 permit does not authorize take within the Project site. Approval of the proposed Major Amendment to the Subarea Plan and amendment of the County's Section 10(a)(1)(B) permit would remove any Project inconsistencies with the County's MSCP Subarea Plan. Project compliance with the MSCP is discussed in detail in Subsection 3.3.1, *Biological Resources – Regulatory Framework*.

1.6 Organization of the EIR

Issues and concerns raised through the public involvement and scoping process, as well as meetings with the County, Wildlife Agencies and the Project Proponent, contributed to the overall scope of this Draft EIR. A summary of the Proposed Project, alternatives, impacts and mitigation measures is provided in the Summary Chapter. Chapter 1.0 describes the purpose and scope of the Project including goals/objectives under CEQA. Chapter 2.0 of this includes a description of the Proposed Project and alternatives. Chapter 3.0 includes the Existing Conditions for each of the 12 issue areas. Chapter 4.0 includes the Environmental Impacts and Mitigation for each of the 12 issue areas. For potential significant environmental impacts that could result from the Project or any of the alternatives, this EIR identifies mitigation measures available to reduce impacts to less than significant. A Mitigation Monitoring and Reporting Program (MMRP) will be prepared with the Final EIR. Chapter 5.0 of this EIR includes a list of the cumulative projects and the cumulative analyses for each of the 12 issue areas. Chapter 6.0 includes other required analysis for CEQA. Chapter 7.0 includes a list of references. Chapter 8.0 includes a list of the EIR preparers as well as persons and organizations contacted during preparation of the EIR. Chapter 9.0 includes a list of mitigation measures and project design features as required by the County.

It was determined that the following issues area could be significantly affected by the Proposed Project:

- Geological Resources
- Hydrology/Water Quality
- Biological Resources
- Cultural Resources
- Noise
- Air Quality/Climate Change
- Transportation/Circulation
- Hazardous Material, Public Health and Safety
- Land Use
- Aesthetics
- Public Services and Utilities
- Paleontological Resources

1.7 CEQA Guidelines and Appendix G Updates

In 2013, the Governor’s Office of Planning and Research initiated a comprehensive, multiyear effort aimed at updating the CEQA Guidelines, including the Appendix G environmental checklist. The proposed updates to the CEQA Guidelines were published in November 2017. The Natural Resources Agency has finalized the updates to the CEQA Guidelines and changes have been approved by the Office of Administrative Law and were in effect as of January 2019. Preparation of this EIR has been underway for several years and, therefore, follows the previous CEQA Guidelines.

The approved updates to the CEQA Guidelines fall into two categories: (1) efficiency and organizational improvements, and (2) major substantive improvements. These updates incorporate California Supreme Court decisions and recently adopted legislation amending CEQA Guidelines, including major reforms pertaining to the metrics used in evaluating transportation impacts and new environmental resource topics such as tribal cultural resources.

While the updated 2019 CEQA Guidelines Appendix G environmental checklist includes changes to 12 of the 18 existing environmental resource topics and 2 new resource topics, this EIR includes an analysis of all applicable thresholds. Table 1-2, *Updated CEQA Guidelines Checklist – New or Modified*, summarizes the updated 2019 CEQA Guidelines Appendix G environmental issue areas that include new or modified thresholds, and where the relevant analysis is provided in the EIR. Table 1-3, *Updated CEQA Guidelines Checklist – Removed*, summarizes the updated CEQA Guidelines Appendix G environmental issue areas from which thresholds were removed.

Table 1-1 REQUIRED PERMITS		
Discretionary Approval/Permit	Approving Agency	Description
Major Use Permit	County	Required to authorize any proposed mining activities within the EOMSP for which Major Use Permit Findings must be made.
Amendment of the East Otay Mesa Specific Plan (EOMSP)	County	The EOMSP would be amended to change the designation of approximately 33 acres of Mixed Industrial land to Conservation/ Limited Open Space. Approximately 78 acres of land currently designated Rural Residential would be designated as Mixed Industrial. Finally, the SPA would change the designation of 189 acres of Rural Residential to Conservation/ Limited Use.
Boundary Adjustment	County	The Project Applicant intends to purchase property as part of the proposed Otay Hills Conservation Area (OHCA). These areas are not currently separate legal lots, and per the Subdivision Map Act, parcels which are not legal lots cannot be purchased; therefore, the Project Applicant has filed a Boundary Adjustment (PDS2018-BC-18-0017) for APNs 648-050-12, 13, 14, and 17, to create legal parcels which can be purchased for the OHCA.
Reclamation Plan	County/State Board of Mining and Geology	Required under the California Surface Mining and Reclamation Act (SMARA) of 1975 (PRC Section 2710 et. seq.). A Reclamation Plan defines the activities to be carried out when extraction has been completed at a particular site. The extracted land must be returned to a useful, approved alternative purpose. The State Board of Mining and Geology certifies lead agencies after the adoption of ordinances that embody the requirements of SMARA. Through the adoption of Ordinance 87.701 and as further clarified in Section 6556 of the County Zoning Ordinance, the County has been recognized as Lead Agency for the implementation of SMARA.
Annexation to Otay Water District's Southern Service Area (Improvement District 22)	Otay Water District (OWD)	Water service is only furnished by the OWD to properties within (annexed to) a water improvement district within the OWD service area.

Table 1-1 (cont.) REQUIRED PERMITS		
Discretionary Approval/Permit	Approving Agency	Description
National Pollutant Discharge Elimination System (NPDES) General Industrial Activity Storm Water Permit	State Water Resources Control Board (SWRCB)	The Clean Water Act (CWA) prohibits discharges of wastes into a "water of the United States" without an NPDES permit.
Major Amendment to the MSCP Subarea Plan	County U.S. Fish and Wildlife Service (USFWS) California Department of Fish and Wildlife (CDFW)	Due to the location of the Project property, this is required under the MSCP Subarea Plan in order to develop (rather than conserve) the property.
Amendment to Endangered Species Act Section 10 Permit	USFSW	Federal ESA Section 10(a)(2)(B) requires that specific permit issuance criteria be met before USFWS may issue ITPs.
California Fish and Game Section 1602 Streambed Alteration Agreement	CDFW	This is required prior to commencing any activity that may do one or more of the following: <ul style="list-style-type: none"> • Substantially divert or obstruct the natural flow of any river, stream or lake; • Substantially change or use any material from the bed, channel or bank of any river, stream, or lake; or • Deposit debris, waste or other materials that could pass into any river, stream or lake.
CWA Section 404 Permit	U.S. Army Corps of Engineers (Corps)	The CWA requires a permit before dredged or fill material may be discharged into waters of the United States.
CWA Section 401 Certification	California Regional Water Quality Control Board (RWQCB)	This Program regulates discharges of fill and dredged material to all waters of the state, including waters of the U.S. under CWA Section 401 and the Porter-Cologne Water Quality Control Act.
Section 106 Compliance	State Historic Preservation Officer (SHPO)	Section 106 of the National Historic Preservation Act of 1966 (NHPA) requires Federal agencies to consider the effects of projects they carry out, approve, or fund on historic properties.

Table 1-1 (cont.) REQUIRED PERMITS		
Discretionary Approval/Permit	Approving Agency	Description
Air Quality Authority to Construct and Permit to Operate	San Diego Air Pollution Control District (APCD)	Any person or organization proposing to construct, modify, or operate a facility or equipment that may emit pollutants from a stationary source into the atmosphere is required to obtain these permits under Rule 10 of the APCD.
Inert Debris Recycling Center Notification	County of San Diego Local Enforcement Agency (LEA)	Pursuant to CCR Title 14, Division 7, Article 3, Section 18103 - 18103.3, any operator proposing to engage in solid waste handling must notify the LEA prior to commencing operations.

**Table 1-2
UPDATED CEQA GUIDELINES CHECKLIST – NEW OR MODIFIED**

2019 Modification	Updated Appendix G Guideline	Where Addressed in EIR	Significance Determination in EIR (After Mitigation)	Significance Determination with Updated Guidelines
<i>I. Aesthetics</i>				
Edited	Threshold C: Would the project, in non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experiences from publicly accessible vantage points). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	Section 4.10, Aesthetics Threshold 1: Would the Project introduce features that would detract from or contrast with the existing visual character and/or quality of a neighborhood, community, or localized area by conflicting with important visual elements or the quality of the area (such as theme, style, setbacks, density, size, massing, coverage, scale, color, architecture, building materials, etc.) or by being inconsistent with applicable design guidelines?	Less than Significant	Remains unchanged
<i>III. Air Quality</i>				
Edited	Threshold B: Would the project 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?	Section 4.6, Air Quality Threshold 2: Would the Project result in emissions that would violate any air quality standard or contribute substantially to an existing or projected air quality violation as follows: a. Result in emissions that exceed 250 pounds per day of NO _x , or 75 pounds per day of VOCs?	Significant	Remains unchanged

<p style="text-align: center;">Table 1-2 (cont.) UPDATED CEQA GUIDELINES CHECKLIST – NEW OR MODIFIED</p>				
2019 Modification	Updated Appendix G Guideline	Where Addressed in EIR	Significance Determination in EIR (After Mitigation)	Significance Determination with Updated Guidelines
III. Air Quality (cont.)				
		b. Result in emissions of CO of 550 pounds per day, and when totaled with the ambient concentrations, would exceed a 1-hour concentration of 20 ppm or an 8-hour average of 9 ppm? c. Result in emissions of PM _{2.5} that exceed 55 pounds per day? d. Result in emissions of PM ₁₀ that exceed 100 pounds per day and increase the ambient PM ₁₀ concentration by 5.0 micrograms per cubic meter or greater at the maximum exposed individual?		
Edited	Threshold D: Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	Section 4.6, Air Quality Threshold 5: Would the project generate objectionable odors or place sensitive receptors next to existing objectionable odors, which will affect a considerable number of people?	Less than Significant	Remains unchanged

Table 1-2 (cont.)
UPDATED CEQA GUIDELINES CHECKLIST – NEW OR MODIFIED

2019 Modification	Updated Appendix G Guideline	Where Addressed in EIR	Significance Determination in EIR (After Mitigation)	Significance Determination with Updated Guidelines
IV. Biological Resources				
Edited	Threshold C: Would the project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	Section 4.3, Biological Resources Threshold 2: Would the Project cause any of the following to occur to or within jurisdictional wetlands and/or riparian habitats as defined by the Corps, CDFW, and County: vegetation removal; grading; obstruction or diversion of water flow; adverse change in velocity, siltation, volume of flow, or runoff rate; placement of fill; placement of structures; road crossing construction; placement of culverts or other underground piping; any disturbance of the substratum; and/or any activity that may cause an adverse change in native species composition, diversity and abundance?	Less than Significant	Remains unchanged

Table 1-2 (cont.) UPDATED CEQA GUIDELINES CHECKLIST – NEW OR MODIFIED				
2019 Modification	Updated Appendix G Guideline	Where Addressed in EIR	Significance Determination in EIR (After Mitigation)	Significance Determination with Updated Guidelines
V. Cultural Resources				
Edited	Threshold A: Would the project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	Section 4.4, Cultural Resources Threshold 1: Would the Project cause a substantial adverse change in the significance of a historical resource, as defined in §15064.5 of the State CEQA Guidelines? This shall include the destruction, disturbance or any alteration of characteristics or elements of a resource that cause it to be significant in a manner not consistent with the Secretary of Interior Standards.	Less than Significant	Remains unchanged
Edited	Threshold C: Would the project disturb any human remains, including those interred outside of dedicated cemeteries?	Section 4.4, Cultural Resources Threshold 3: Would the Project disturb any human remains, including those interred outside of formal cemeteries?	No impact	Remains unchanged

<p style="text-align: center;">Table 1-2 (cont.) UPDATED CEQA GUIDELINES CHECKLIST – NEW OR MODIFIED</p>				
2019 Modification	Updated Appendix G Guideline	Where Addressed in EIR	Significance Determination in EIR (After Mitigation)	Significance Determination with Updated Guidelines
VI. Energy				
New	Threshold A: Would the project result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	<p>Section 4.12, Climate Change</p> <p>The Project would implement best available control technologies, use of clean-burning off-road equipment, and compliance with 2016 Title 24 Energy Efficiency standards to reduce GHG emissions.</p>	--	Less than Significant – Through implementation of measures to reduce GHG emissions, the Project would also reduce energy use and consumption, and would therefore not result in a significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources.

2019 Modification	Updated Appendix G Guideline	Where Addressed in EIR	Significance Determination in EIR (After Mitigation)	Significance Determination with Updated Guidelines
VI. Energy (cont.)				
New	Threshold B: Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	Section 4.12, Climate Change The Project would implement best available control technologies, use of clean-burning off-road equipment, and compliance with 2016 Title 24 Energy Efficiency standards to reduce GHG emissions and be consistent with applicable plans for reducing GHG emissions.	--	Less than Significant – Through implementation of Title 24 Energy Efficiency standards, the Project would not conflict with state or local plans related to energy.
VII. Geology and Soils				
Edited	Threshold A: Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: i. Strong seismic ground shaking; and ii. Seismic-related ground failure, including liquefaction.	Section 4.1, Geological Resources County Guidelines related to strong seismic ground shaking are not applicable to the Proposed Project are not addressed in the EIR.	No further analysis required	No further analysis required
		Threshold 3: Would the Proposed Project expose people or structures to potential adverse effects, including potentially liquefiable soils or in-situ soil densities that are not sufficiently high to preclude liquefaction?	Less than Significant	Remains unchanged

<p style="text-align: center;">Table 1-2 (cont.) UPDATED CEQA GUIDELINES CHECKLIST – NEW OR MODIFIED</p>				
2019 Modification	Updated Appendix G Guideline	Where Addressed in EIR	Significance Determination in EIR (After Mitigation)	Significance Determination with Updated Guidelines
VII. Geology and Soils (cont.)				
Edited	Threshold D: Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risk to life or property?	Section 4.1, Geological Resources County Guidelines related to expansive soils are not applicable to the Proposed Project and are not addressed in the EIR.	No further analysis required	No further analysis required
Relocated	Threshold F: Would the project directly or indirectly destroy a unique paleontological resources or site or unique geologic feature?	Section 4.13, Paleontological Resources Threshold 1: Would the Project propose activities that directly or indirectly damage a unique paleontological resource or site?	Less than Significant	Remains unchanged
IX. Hazards and Hazardous Materials				
Combined	Threshold E: For a project located within an airport land use plan, or where such a plan has not been adopted, within 2 miles of a public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	Threshold identified as requiring no analysis. The Project site is not located within 2 miles of a public airport or public use airport.	No further analysis required	No further analysis required

<p style="text-align: center;">Table 1-2 (cont.) UPDATED CEQA GUIDELINES CHECKLIST – NEW OR MODIFIED</p>				
2019 Modification	Updated Appendix G Guideline	Where Addressed in EIR	Significance Determination in EIR (After Mitigation)	Significance Determination with Updated Guidelines
<i>IX. Hazards and Hazardous Materials (cont.)</i>				
Edited	Threshold G: Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	<p>Section 4.8, Hazardous Materials, Public Health and Safety</p> <p>Threshold 4: Would the Project expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildland fires are adjacent to urbanized areas or where residences are intermixed with wildlands?</p>	Less than Significant	Remains unchanged
<i>X. Hydrology and Water Quality</i>				
Combined	Threshold A: Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	<p>Section 4.2, Hydrology/Water Quality</p> <p>Threshold 6: Would the Project potentially degrade the water quality of any impaired water course or water body, as listed on the CWA Section 303(d) list and contribute additional pollutants for which the receiving water body is already listed?</p>	Less than Significant	Remains unchanged

<p style="text-align: center;">Table 1-2 (cont.) UPDATED CEQA GUIDELINES CHECKLIST – NEW OR MODIFIED</p>				
2019 Modification	Updated Appendix G Guideline	Where Addressed in EIR	Significance Determination in EIR (After Mitigation)	Significance Determination with Updated Guidelines
<i>X. Hydrology and Water Quality (cont.)</i>				
		Threshold 7: Would the Project not conform to applicable Federal, State, or local statutes and regulations related to surface or groundwater quality including but not limited to: the IBWC, CWA/NPDES, and California Porter-Cologne Water Quality Control Act?	Less than Significant	Remains unchanged
Edited	Threshold B: Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	Section 4.2, Hydrology/Water Quality The Proposed Project would not result in the addition of substantial areas of impervious surfaces.	--	Less than Significant – Because the Proposed Project would not result in the addition of substantial areas of impervious surfaces, it would not reduce infiltration and would therefore not interfere with groundwater recharge.

**Table 1-2 (cont.)
UPDATED CEQA GUIDELINES CHECKLIST – NEW OR MODIFIED**

2019 Modification	Updated Appendix G Guideline	Where Addressed in EIR	Significance Determination in EIR (After Mitigation)	Significance Determination with Updated Guidelines
<i>X. Hydrology and Water Quality (cont.)</i>				
Edited	Threshold C(i): Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would: <ul style="list-style-type: none"> Result in substantial erosion or siltation on- or off-site? 	Section 4.2, Hydrology/Water Quality Threshold 1: Would the Project substantially alter the existing drainage patterns 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?	Less than Significant	Remains unchanged
Edited	Threshold C(ii): Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would: <ul style="list-style-type: none"> Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off-site? 	Section 4.2, Hydrology/Water Quality Threshold 2: Would the Project substantially later the existing drainage patterns 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?	Less than Significant	Remains unchanged

<p style="text-align: center;">Table 1-2 (cont.) UPDATED CEQA GUIDELINES CHECKLIST – NEW OR MODIFIED</p>				
2019 Modification	Updated Appendix G Guideline	Where Addressed in EIR	Significance Determination in EIR (After Mitigation)	Significance Determination with Updated Guidelines
<i>X. Hydrology and Water Quality (cont.)</i>				
Edited	<p>Threshold C(iv): Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:</p> <ul style="list-style-type: none"> • Impede or redirect flood flows? 	<p>Section 4.2, Hydrology/Water Quality</p> <p>Threshold 4: Would the Project place structures within a 100-year flood hazard area which would impede or redirect flood flows?</p>	No impact – the Project site is not mapped within a 100-year flood hazard area.	Remains unchanged – The Project site is not within a flood hazard area and would therefore not impede or redirect flood flows.
Edited	<p>Threshold D: Would the project, in flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?</p>	<p>Section 4.2, Hydrology/Water Quality</p> <p>The project site is not mapped within a flood hazard area.</p>	--	Less than Significant – The project site is not at risk of flood, tsunami, or seiche and would therefore not risk release of pollutants due to inundation.

<p style="text-align: center;">Table 1-2 (cont.) UPDATED CEQA GUIDELINES CHECKLIST – NEW OR MODIFIED</p>				
2019 Modification	Updated Appendix G Guideline	Where Addressed in EIR	Significance Determination in EIR (After Mitigation)	Significance Determination with Updated Guidelines
<i>X. Hydrology and Water Quality (cont.)</i>				
New	Threshold E: Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<p>Section 4.2, Hydrology/Water Quality</p> <p>Threshold 7: Would the Project not conform to applicable Federal, State or local statutes and regulations related to surface or groundwater quality including but not limited to: the IBWC, CWA/NPDES, and California Porter-Cologne Water Quality Control Act?</p>	Less than Significant	Remains unchanged
<i>XIII. Noise</i>				
Combined	Threshold A: Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<p>Section 4.5, Noise</p> <p>Threshold 1: Would the Project generate construction noise that exceeds the standards listed in the San Diego County Code, Section 36.409, Sound Level Limitations on Construction Equipment?</p>	Less than Significant	Remains unchanged

Table 1-2 (cont.)
UPDATED CEQA GUIDELINES CHECKLIST – NEW OR MODIFIED

2019 Modification	Updated Appendix G Guideline	Where Addressed in EIR	Significance Determination in EIR (After Mitigation)	Significance Determination with Updated Guidelines
<i>XIII. Noise (cont.)</i>				
		<p>Threshold 2: Would the Project expose exterior on- or off-site, existing or reasonably foreseeable future, NSLUs to noise (including road noise) in excess of 60 dBA CNEL for single-family residential uses, 65 dBA CNEL for multi-family residential uses, or an increase of 10 dBA CNEL or more over pre-existing noise levels (if that noise level is less than 50 CNEL); or expose interior on- or off-site, existing or reasonably foreseeable future, NSLUs to noise in excess of 45 dBA CNEL?</p>	Significant	Remains unchanged
		<p>Threshold 3: Would the Project generate non-transportation noise that exceeds the standards listed in the San Diego County Code, Section 36.404, Sound Level Limits, or Section 6300 et seq. of the San Diego County Zoning Ordinance, at all property lines or other applicable locations?</p>	Less than Significant	Remains unchanged

Table 1-2 (cont.) UPDATED CEQA GUIDELINES CHECKLIST – NEW OR MODIFIED				
2019 Modification	Updated Appendix G Guideline	Where Addressed in EIR	Significance Determination in EIR (After Mitigation)	Significance Determination with Updated Guidelines
<i>XIII. Noise (cont.)</i>				
Edited	Threshold B: Would the project result in generation of excessive groundborne vibration or groundborne noise levels?	Section 4.5, Noise Threshold 4: Would the Project expose the uses listed in Threshold Matrix 1 to ground-borne vibration or noise levels equal to or in excess of the levels shown?	Less than Significant	Remains unchanged
Combined	Threshold C: For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within 2 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?	Threshold identified as requiring no analysis. The Project site is not located within 2 miles of a public airport or public use airport.	No further analysis required	No further analysis required
<i>XVII. Transportation</i>				
Combined	Threshold A: Would the project conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	Section 4.7, Transportation/Circulation		
		Threshold 1 (County of San Diego – impacts to roadway segments)	Less than Significant	Remains unchanged
		Threshold 2 (County of San Diego – impacts to signalized intersections)	Less than Significant	Remains Unchanged
		Threshold 3 (County of San Diego – impacts to unsignalized intersections)	Less than Significant	Remains Unchanged

**Table 1-2 (cont.)
UPDATED CEQA GUIDELINES CHECKLIST – NEW OR MODIFIED**

2019 Modification	Updated Appendix G Guideline	Where Addressed in EIR	Significance Determination in EIR (After Mitigation)	Significance Determination with Updated Guidelines
<i>XVII. Transportation (cont.)</i>				
		Threshold 4 (County of San Diego – impacts to regionally significant arterials)	No further analysis required	No further analysis required
		Threshold 5 (County of San Diego – impacts to ramps)	No further analysis required	No further analysis required
		Threshold 7 (County of San Diego – impacts to pedestrians and/or bicyclists)	Less than Significant	Remains Unchanged
		Threshold 8 (City of San Diego – impacts to intersections, roadway segments, or freeways)	Less than Significant	Remains Unchanged
		Threshold 9 (City of San Diego – impacts to ramps)	No further analysis required	No further analysis required
		Threshold 10 (City of San Diego – impacts to congested freeway segment, interchange, or ramp)	No further analysis required	No further analysis required
		Threshold 11 (City of San Diego – impacts from traffic hazards to motor vehicles, bicyclists, or pedestrians)	Less than Significant	Remains Unchanged
		Threshold 12 (California Department of Transportation – Impacts to intersections, freeway segments, or ramps)	Less than Significant	Remains Unchanged

<p style="text-align: center;">Table 1-2 (cont.) UPDATED CEQA GUIDELINES CHECKLIST – NEW OR MODIFIED</p>				
2019 Modification	Updated Appendix G Guideline	Where Addressed in EIR	Significance Determination in EIR (After Mitigation)	Significance Determination with Updated Guidelines
<i>XVII. Transportation (cont.)</i>				
New	Threshold B: Would the project conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)?	<p>Section 4.12, Climate Change</p> <p>The Proposed Project would generate less than 10,000 MT CO₂e per year for all Phases. As such, Therefore, GHG impacts associated with the Proposed Project would be less than significant.</p>	Less than significant	Remains unchanged because the Project would generate less than 10,000 MT CO ₂ e per year for all Phases , it would be consistent with CEQA Guidelines §15064.3, subdivision (b).
Edited	Threshold C: Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<p>Section 4.7, Transportation/Circulation</p> <p>Threshold 6 (County of San Diego): A significant traffic hazard impact due to a design feature would occur if the Project would (on a case-by-case basis):</p> <p>a. Have design features/physical configurations of access roads that would adversely affect the safe transport of vehicles along the roadway;</p>	No impact	Remains unchanged

Table 1-2 (cont.) UPDATED CEQA GUIDELINES CHECKLIST – NEW OR MODIFIED				
2019 Modification	Updated Appendix G Guideline	Where Addressed in EIR	Significance Determination in EIR (After Mitigation)	Significance Determination with Updated Guidelines
<i>XVII. Transportation (cont.)</i>				
		b. Result in a percentage or magnitude of increased traffic on the road that would affect the safety of the roadway; c. Result in physical conditions of the project site and surrounding area, such as curves, slopes, walls, landscaping or other barriers, that could result in vehicle conflicts with other vehicles and/or stationary objects; or d. Does not conform to the requirements of the private or public road standards, as applicable. Threshold 11 (City of San Diego): Would the Project increase traffic hazards to motor vehicles, bicyclists, or pedestrians due to proposed non-standard design features (e.g., poor sight distance, proposed driveway onto an access-restricted roadway)?	Less than Significant	Remains Unchanged

**Table 1-2 (cont.)
UPDATED CEQA GUIDELINES CHECKLIST – NEW OR MODIFIED**

2019 Modification	Updated Appendix G Guideline	Where Addressed in EIR	Significance Determination in EIR (After Mitigation)	Significance Determination with Updated Guidelines
<i>XIX. Utilities and Service Systems</i>				
Combined	Threshold A: Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	Section 4.11, Public Services and Utilities		
		Threshold 2: Would the Project require construction of new gas or electric facilities or expansion or relocation of existing facilities, either of which would cause significant environmental effects?	Less than Significant	Remains unchanged
		Threshold 3: Would the Project require construction of new storm drainage facilities or expansion of existing facilities, either of which would cause significant environmental effects?	Less than Significant	Remains unchanged
Edited	Threshold B: Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	Section 4.11, Public Services and Utilities Threshold 4: Would the Project lack availability of sufficient water supplies to serve the Project from existing entitlements and resources?	Less than Significant	Remains unchanged

Table 1-2 (cont.)
UPDATED CEQA GUIDELINES CHECKLIST – NEW OR MODIFIED

2019 Modification	Updated Appendix G Guideline	Where Addressed in EIR	Significance Determination in EIR (After Mitigation)	Significance Determination with Updated Guidelines
<i>XIX. Utilities and Service Systems (cont.)</i>				
Edited	Threshold D: Would the project generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	Section 4.11, Public Services and Utilities Threshold 5: Would the Project lack availability of sufficient permitted landfill capacity to accommodate the Project's solid waste disposal needs?	Less than Significant	Remains unchanged
Edited	Threshold E: Would the project comply with federal, state, or local management and reduction statutes and regulations related to solid waste?	Section 4.11, Public Services and Utilities Threshold 6: Would the Project not comply with Federal, State, and local solid waste statutes and regulations?	Less than Significant	Remains unchanged
<i>XX. Wildfire</i>				
New	Threshold A: If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project impair an adopted emergency response plan or emergency evacuation plan?	Section 4.8, Hazardous Materials, Public Health and Safety Threshold 4: Would the Project 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.	Less than Significant	Remains unchanged
New	Threshold B: If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project due to slope, prevailing winds, and other factors, exacerbate fire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?		Less than Significant	Remains unchanged

**Table 1-2 (cont.)
UPDATED CEQA GUIDELINES CHECKLIST – NEW OR MODIFIED**

2019 Modification	Updated Appendix G Guideline	Where Addressed in EIR	Significance Determination in EIR (After Mitigation)	Significance Determination with Updated Guidelines
XX. Wildfire (cont.)				
New	Threshold C: If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project 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 risks or that may result in temporary or ongoing impacts to the environment?		Less than Significant	Remains unchanged
New	Threshold D: If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire instability, or drainage changes?		Less than Significant	Remains unchanged

**Table 1-3
UPDATED CEQA GUIDELINES CHECKLIST – REMOVED**

Potential Environmental Impact	EIR Location	Significance Determination in EIR (After Mitigation)
III. Air Quality		
Threshold B: Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation?	Section 4.6, Air Quality Threshold 2: Would the Project result in emissions that would violate any air quality standard or contribute substantially to an existing or projected air quality violation as follows: <ul style="list-style-type: none"> a. Result in emissions that exceed 250 pounds per day of NO_x, or 75 pounds per day of VOCs? b. Result in emissions of CO of 550 pounds per day, and when totaled with the ambient concentrations, would exceed a 1-hour concentration of 20 ppm or an 8-hour average of 9 ppm? c. Result in emissions of PM_{2.5} that exceed 55 pounds per day? d. Result in emissions of PM₁₀ that exceed 100 pounds per day and increase the ambient PM₁₀ concentration by 5.0 micrograms per cubic meter or greater at the maximum exposed individual? 	Less than Significant
IX. Hazards and Hazardous Materials		
Threshold F: 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?	Threshold identified as requiring no analysis. The Project site is not located within 2 miles of a private airstrip.	No further analysis required

Table 1-3 UPDATED CEQA GUIDELINES CHECKLIST – REMOVED		
Potential Environmental Impact	EIR Location	Significance Determination in EIR (After Mitigation)
X. Hydrology and Water Quality		
Threshold H: Would the project place housing within a 100-year flood hazard area as mapped on a federal flood hazard boundary map or FIRM or other flood hazard delineation map?	Threshold identified as requiring no analysis. The Project does not propose housing.	No further analysis required
Threshold I: Would the project place within a 100-year flood hazard area structures which would impede or redirect flood flows?	Section 4.2, Hydrology/Water Quality Threshold 4: Would the Project place structures within a 100-year flood hazard area which would impede or redirect flood flows?	No impact
XI. Land Use and Planning		
Threshold C: Would the project conflict with any applicable habitat conservation plan or natural community conservation plan?	Section 4.9, Land Use and Planning Threshold 2: Would the Project conflict with any habitat conservation plan or natural community conservation plan applicable to the Project site?	Less than significant
XII. Noise		
Threshold C: Would the project result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	Section 4.5, Noise Threshold 2: Would the Project expose exterior on- or off-site, existing or reasonably foreseeable future, NSLUs to noise (including road noise) in excess of 60 dBA CNEL for single-family residential uses, 65 dBA CNEL for multi-family residential uses, or an increase of 10 dBA CNEL or more over pre-existing noise levels (if that noise level is less than 50 CNEL); or expose interior on- or off-site, existing or reasonably foreseeable future, NSLUs to noise in excess of 45 dBA CNEL?	Significant

**Table 1-3
UPDATED CEQA GUIDELINES CHECKLIST – REMOVED**

Potential Environmental Impact	EIR Location	Significance Determination in EIR (After Mitigation)
XII. Noise (cont.)		
	Threshold 3: Would the Project generate non-transportation noise that exceeds the standards listed in the San Diego County Code, Section 36.404, Sound Level Limits, or Section 6300 et seq. of the San Diego County Zoning Ordinance, at all property lines or other applicable locations?	Less than Significant
Threshold D: Would the project result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	Section 4.5, Noise Threshold 1: Would the Project generate construction noise that exceeds the standards listed in the San Diego County Code, Section 36.409, Sound Level Limitations on Construction Equipment?	Less than Significant
Threshold 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?	Threshold identified as requiring no analysis. The Project site is not located within 2 miles of a private airstrip.	No further analysis required
XVII. Transportation		
Threshold B: Would the project 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?	Section 4.7, Transportation/Circulation	
	Threshold 1 (County of San Diego – impacts to roadway segments)	Less than Significant
	Threshold 2 (County of San Diego – impacts to signalized intersections)	Less than Significant
	Threshold 3 (County of San Diego – impacts to unsignalized intersections)	Less than Significant
	Threshold 4 (County of San Diego – impacts to regionally significant arterials)	No further analysis required
	Threshold 5 (County of San Diego – impacts to ramps)	No further analysis required

**Table 1-3
UPDATED CEQA GUIDELINES CHECKLIST – REMOVED**

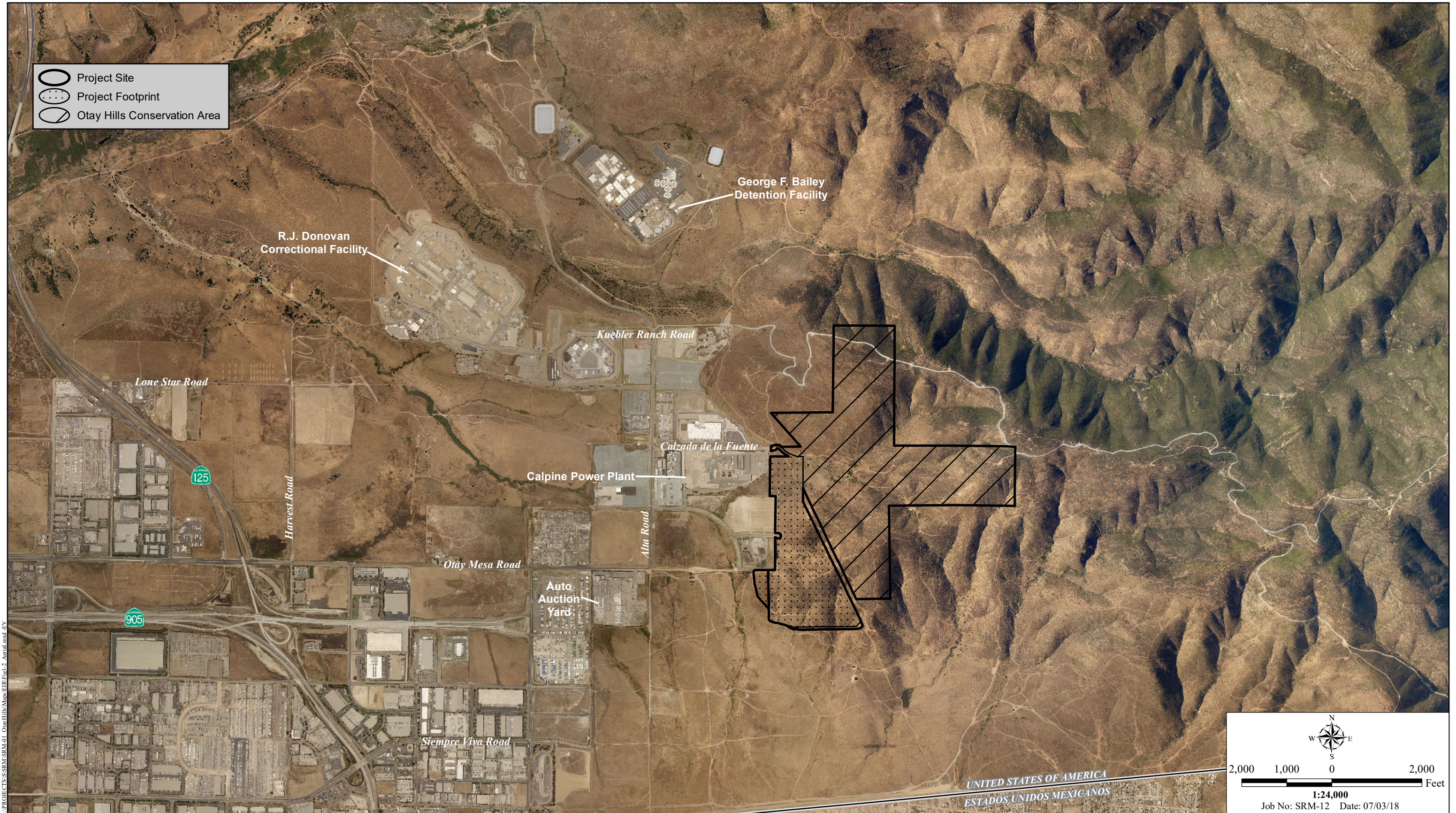
Potential Environmental Impact	EIR Location	Significance Determination in EIR (After Mitigation)
<i>XVII. Transportation (cont.)</i>		
	Threshold 8 (City of San Diego – impacts to intersections, roadway segments, or freeways)	Less than Significant
	Threshold 9 (City of San Diego – impacts to ramps)	No further analysis required
	Threshold 10 (City of San Diego – impacts to congested freeway segment, interchange, or ramp)	No further analysis required
	Threshold 12 (California Department of Transportation – Impacts to intersections, freeway segments, or ramps)	Less than Significant
Threshold C: Would the project 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?	Threshold identified as requiring no analysis. The Project site is not in the vicinity of an airport and would not result in a change in air traffic patterns.	No further analysis required
<i>XIX. Utilities and Service Systems</i>		
Threshold A: Would the project exceed wastewater treatment requirements of the applicable RWQCB?	Threshold identified as requiring no analysis. Because the Project would not introduce a permanent population to the site or a land use that generates a substantial amount of wastewater, the Project would not exceed the wastewater treatment requirements of the applicable RWQCB.	No further analysis required.
Threshold C: Would the project require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	Section 4.11, Public Services and Utilities Threshold 3: Would the Project require construction of new storm water drainage facilities or expansion or relocation of existing facilities, the construction of which could cause significant environmental effects?	Less than Significant



Regional Location

OTAY HILLS EIR

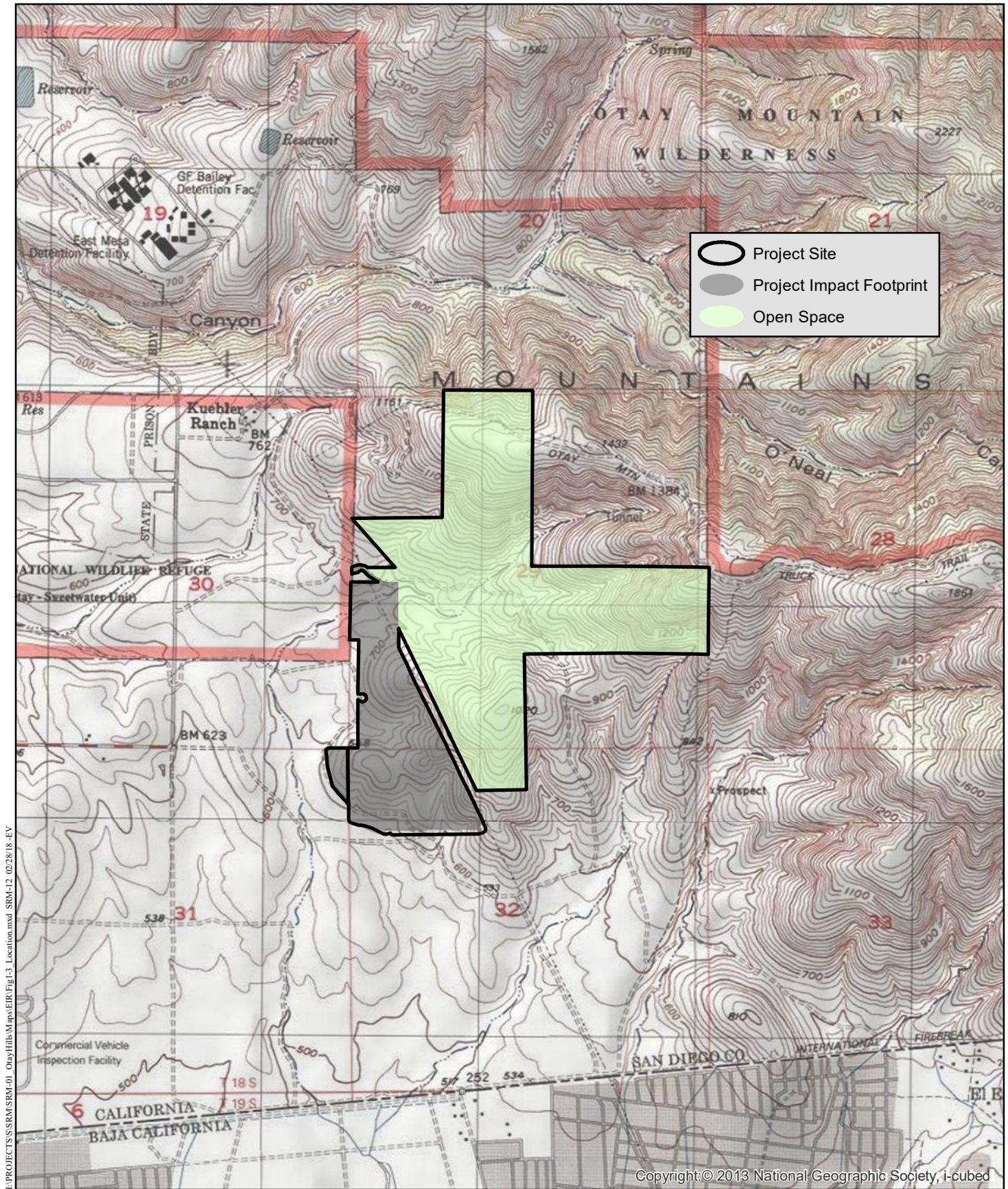
Figure 1-1



Aerial Photograph

OTAY HILLS EIR

Figure 1-2



Project Location - USGS

OTAY HILLS EIR

Figure 1-3