

**CAMP BASHOR PROJECT MND ADDENDUM
SAN DIEGO COUNTY, CALIFORNIA**

Prepared for:

**COUNTY OF SAN DIEGO
DEPARTMENT OF PARKS AND RECREATION**

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SECTION 1.0 – INTRODUCTION

1.1 OVERVIEW/PURPOSE

This addendum to the Final Initial Study/Mitigated Negative Declaration Otay Lakes Campground Project (June 2020 MND; SCH #2020019003) analyzes potential environmental impacts that would result from changes to the original project description since certification of the June 2020 MND. The June 2020 MND for the Camp Bashor Project (formerly the Otay Lakes Campground Project) was certified by the County of San Diego Board of Supervisors on June 24, 2020. Since the June 2020 MND approval, the County Department of Parks and Recreation has proposed alteration and/or relocation of various Project features and construction of some additional Project features, as detailed in Table 2 below.

1.2 CEQA REQUIREMENTS

In order to satisfy the conditions set forth in §15162 through §15164 of the *State CEQA Guidelines*, the County of San Diego has used a matrix entitled *Environmental Checklist for the Camp Bashor Project* (Project) to make the following determinations:

- Ø No substantial changes are proposed in the Project that require major revisions to the original Final Mitigated Negative Declaration (MND) prepared by the County of San Diego Department of Parks and Recreation due to the involvement of significant environmental effects or a substantial increase in the severity of previously identified significant effects;
- Ø No substantial changes will occur with respect to the circumstances under which the proposed Project is undertaken, and no major revisions to the Final MND will be required; and
- Ø No substantial new information has been provided that would require a major revision to the Final MND.

Based on the information incorporated into the *Environmental Checklist for the Camp Bashor Project*, there are no conditions that would require the preparation of a subsequent or supplemental MND pursuant to §15162 through §15164 of the CEQA Guidelines.

SECTION 2.0 – PROJECT DESCRIPTION

2.1 PROJECT BACKGROUND

The County of San Diego (County) Department of Parks and Recreation (DPR), as the lead agency under the California Environmental Quality Act (CEQA), has prepared this Initial Study (IS) and Addendum to evaluate the potential environmental impacts associated with the Camp Bashor Project (Project). The Project involves the alteration and/or relocation of various Project features proposed in the June MND, as well as construction of some additional features, at the County's existing Otay Lakes County Park (Park) in San Diego County, California.

A MND was completed in June 2020 for the original project (June 2020 Project). The June 2020 Project involved the development of new camping facilities, a flag plaza, archery range, fire ring and amphitheater, zip-line, demolition of existing restroom and construction of a new and larger restroom facility with showers overlapping the existing restroom footprint, development of the Camporee Field, construction of a fenced storage facility, development of six Challenging Outdoor Personal Experience (COPE) stations, and minor road improvements on County property adjacent to Otay Lakes County Park. A site plan for the June 2020 Project is shown in Figure 1. The County Board of Supervisors approved the June Project on June 24, 2020.

The June 2020 MND concluded that the June 2020 Project would have potentially significant impacts to aesthetics, biological resources, cultural resources, geology and soils, hazards and hazardous materials, transportation, and tribal cultural resources. The mitigation measures in Table 1 below were incorporated to reduce all impacts to a less than significant level.

Table 1: June 2020 Project Mitigation Measures

Mitigation Measures by Area
I. Air Quality
MM-AQ-1: To reduce and avoid indirect air quality impacts due to dust generated from Project construction, the following Best Management Practices (BMPs) will be implemented: <ul style="list-style-type: none">• Appropriate construction scheduling and sequencing will be established to reduce the amount and duration of soil exposed to vehicle tracking.• Vehicle speeds will be limited to 15 miles per hour in the Project area.• Watering of roadways will be conducted as needed to alleviate dust generation visible offsite, but will not be applied in quantities that will allow for water ponding. Limits of construction areas will be fenced or flagged and maintained throughout the construction activities.
MM AQ-2: During Special Events at the Project site, watering of roadways will be conducted as needed to alleviate dust generation visible offsite, but will not be applied in quantities that will allow for water ponding.
II. Biological Resources
MM-BIO-1: The following measures will be implemented to avoid all impacts to the Quino Checkerspot Butterfly (QCB): <ul style="list-style-type: none">• Avoid all direct impacts to locations of host plants, including a 100 ft buffer, as mapped during the QCB focused surveys and refined during the 2019 rare plant surveys conducted by Chambers Group;• Prior to construction, but no more than two weeks prior to ground disturbing activities, pre-construction surveys to identify QCB host plant locations will be conducted;

Mitigation Measures by Area
<ul style="list-style-type: none"> All construction or other ground-disturbing maintenance activities within a 100-ft. buffer of mapped QCB host plants will be prohibited during the QCB flight season (defined as the third week of February through the second Saturday of May). Boy Scouts of America (BSA) will conduct environmental awareness training for all personnel entering the Project site during construction and operation of the Project. During flight season, limit activities within the campground to Project features or currently established and maintained trails; no activities will be permitted within area inhabited by host plants and their buffers. Due to the inherent sensitivity of QCB host plants and the proximity of suitable habitat to existing trails, larger events where the trails may be utilized increasing the propensity for people to venture off the established trails. Educational campaigns will be conducted to minimize potential impacts to host plant patches during host plant booming season (generally March to April). Install permanent physical barrier(s) (i.e., fence) and signage, as appropriate, between locations of host plants and Project components to facilitate avoidance of host plant areas. Placement of fencing should be located immediately adjacent to developed areas rather than within habitat such that movement of QCB and other wildlife is not impeded. Signage should clearly state that entry into the host plant area is prohibited. <p>A speed limit of 10 miles per hour will be instituted for all access roads during the QCB flight season (defined as the third week of February through the second Saturday of May)</p>
<p>MM-BIO-2: To avoid the destruction of active nests and to protect the reproductive success of birds protected by Migratory Bird Treaty Act, nesting bird surveys shall be performed not more than 3 days (72 hours) prior to the scheduled construction in the Project site and surrounding area. In the event that active nests are discovered, a suitable buffer should be established around such active nests and no construction within the buffer allowed until a qualified biologist has determined that the nest is no longer active (e.g. the nestlings have fledged and are no longer reliant on the nest). No ground disturbing activities shall occur within this buffer until the qualified biologist has confirmed that breeding/nesting is complete, and the young have fledged the nest. Survey results shall be presented in a letter report and submitted to the County. Nesting bird surveys are not required for construction activities occurring between September 16 and January 31.</p>
<p>MM-BIO-3: A qualified biological monitor shall conduct an environmental awareness training prior to the start of any construction related activities. Special focus should be made on sensitive animals and plants that are present or have a potential for occurrence and sensitive habitat located adjacent to the Project site.</p>
<p>MM-BIO-4: Heavy equipment shall work from existing access roads, footpaths, and bare ground areas as much as possible to avoid unnecessary soil compaction or impacts.</p>
<p>MM-BIO-5: Environmentally sensitive areas, including sensitive plant resources, within 20 ft. of construction areas shall be flagged for avoidance.</p>
<p>MM-BIO-6: A qualified biologist will monitor all construction activities to ensure that standard and special-status species-specific avoidance and minimization recommendations are adhered to. The biological monitor will conduct a general preconstruction survey no more than 14 days prior to the start of construction to verify that no special-status species are in the Project area or its buffers. The monitor shall also conduct a daily survey in and around work areas before activities start.</p>
<p>MM-BIO-7: BMPs shall be implemented to prevent new erosional features from developing in any newly contoured areas (including access roads and footpaths).</p>
<p>MM-BIO-8: Newly exposed bare ground shall be covered with native hydroseed appropriate to the immediately surrounding habitat.</p>
<p>III. Cultural Resources</p>
<p>MM-CUL-1: The Applicant will retain a qualified archaeologist for construction monitoring of all ground disturbing activities located within 50 feet of a known archaeological and/or historic resource. In the event unexpected archaeological and/or historic resources are uncovered during ground-disturbing activities associated with the Project, work must stop in the immediate area until it is evaluated by a qualified archaeologist to ensure satisfactory compliance with applicable regulations (State CEQA Guidelines Section 15064.5(f)).</p>

Mitigation Measures by Area
<p>MM-CUL-2: Should human remains be uncovered during construction, as specified by State Health and Safety Code Section 7050.5, no further disturbance would occur until the County Coroner has made the necessary findings as to the origin and disposition pursuant to PRC 5097.98. If such a discovery occurs, excavation or construction would halt in the area of the discovery, the area would be protected, and consultation and treatment would occur as prescribed by law. If the County Coroner recognizes the remains to be Native American, he or she would contact the Native American Heritage Commission, who would appoint the Most Likely Descendant. Additionally, if the bones are determined to be Native American, a plan would be developed regarding the treatment of human remains and associated burial objects, and the plan would be implemented in coordination with the Most Likely Descendant.</p>
<p>IV. Geology and Soils</p> <p>MM-PAL-1: The Applicant will retain a Standard Monitor, defined by the County as any one person who is on the Project site during all the original cutting of undisturbed substratum, for the portion of the construction activities that extend into the Friars Formation. The Standard Monitor shall be any one person who is on the Project site during all the original cutting of undisturbed substratum. The Standard Monitor must be designated by the Applicant and given the responsibility of watching for fossils so that the Project is in conformance with Section 87.430 of the Grading Ordinance. All ground disturbing activities that extend into the Friars Formation will be monitored and the suspension of grading operation is required upon the discovery of fossils greater than twelve inches in any dimension.</p>
<p>V. Hazards and Hazardous Materials</p> <p>MM-HAZ-1: In preparation for Day Camps and Special Events at the Project site, BSA local councils will prepare an Emergency Action Plan (EAP) and a Fire Prevention Plan (FPP) that is compliant with OSHA standards 29 CFR 1910.38 and 29 CFR 1910.39. An OSHA-compliant EAP/FPP must include but is not limited to the following: a written evacuation plan, site plans showing primary and secondary evacuation routes, emergency alarm system (e.g., manual pull station, public address, radio, two-way radio, voice, or camp signal), the posting of emergency numbers, training of employees on the plan and the procedures, inspection of fire extinguishers, location(s) of hazardous materials (e.g., paints, varnish, inks, propane and gasoline storage tanks, etc.), and responsible party for maintaining the EAP/FPP. Additionally, the FPP shall require that the fire ring not be used on Red Flag warning days.</p>
<p>VI. Transportation</p> <p>MM-TRA-1: Given the potential variability of the parking demand by event, the Project would develop and maintain a Parking Management Plan (PMP). The PMP would provide levels of parking management ranging from “no action” for minor event profiles such as “day camp”, up to actions such as vehicles tandem parked and/or parked in the parking drive-aisle, or possibly off-site parking with a shuttle, if necessary, for the largest events.</p>
<p>VII. Tribal Cultural Resources</p> <p>MM-TRC-1: The Applicant will retain a qualified local Kumeyaay monitor for all ground disturbing activities during construction of the Project. The role of the Native American monitor would be to work with the Project’s Qualified Archaeologist, identify potential Native American Tribal Cultural Resources, represent tribal concerns, and communicate concerns and appropriate handling to the Applicant. Appropriate representatives would be identified, based on the location of the identified traditional location or place.</p>

With implementation of these mitigation measures, no significant impacts were anticipated to result from the June 2020 Project.

2.1.1 Project Location and Site Characteristics

Otay Lakes County Park is located at 2270 Wueste Road in Chula Vista, California, San Diego County. The Project would occur within a 69-acre parcel of County property (APN 644-100-19-00) within the Park (Project site). The Park is located within the boundaries of the Otay Valley Regional Park, which is a multi-

jurisdictional regional park that is jointly owned and managed by the County, the City of Chula Vista, and the City of San Diego.

The Project site currently consists of camping facilities (not presently used), a non-operable restroom building, a walkway attached to a hexagonal covered pavilion with a diameter of approximately 30 to 35 feet, a number of dirt roads that traverse the property, and access to surrounding trails for hiking, biking, and horseback riding. These facilities are currently used by the public and this area would serve as the location of new Project features.

The County General Plan identifies the land use of the Project site as Open Space and zoning as Open Space (S80) and Limited Agriculture (A70) (County 2011; 2020). The S80 zoning designation is intended for recreation areas or areas with severe environmental constraints; A70 is intended for crop or animal agriculture. Surrounding zoning includes S80 to the north and east, Holding Area (S90) to the southeast and south, and Planned Community to the southwest and west. It should be noted that the Project site is generally surrounded by undeveloped land, aside from the Otay Water Treatment Plant to the west/northwest. Most of the undeveloped land is designated as Multiple Habitat Planning Area Cornerstone Lands, Otay Lakes, within the City of San Diego's Multiple Species Conservation Program Subarea Plan (City of SD 1997).

2.2 PROJECT DESCRIPTION

The proposed changes to the June 2020 Project include those listed in Table 2 below. An overview of the proposed site plan is shown in Figure 2.

Table 2 – Proposed Project Changes

Project Feature	June 2020 Project	Description of Proposed Change
<i>New and Not Included in June 2020 Project Scope</i>		
Brush Management Areas	Not Included	Establishment of 100-foot buffer around other project features (in addition to the fire pit), and 1-foot buffer on either side of the fire road
Irrigation	Not Included	Water main extension from central mesa to the lower mesa along the existing trail; water main extension along access road between archery range and amphitheater; proposed 1 ¼ and ¾ inch irrigation lines within central mesa, archery range, and amphitheater.

Landscaping	Not Included	Planting of trees, establishment of landscaped areas within work limits of amphitheater and archery range, and addition of numerous rocks/boulders
ADA Parking Spaces	Not Included	Establishment of a pair of ADA parking spaces by the existing restroom on the central mesa and by the north end of the archery range
Footpaths	Not Included	Construction of a new decomposed granite footpath from the central mesa ADA parking spaces to the existing restrooms
Signage	Not Included	Installation of signs at three locations
<i>Altered from June 2020 Project Scope</i>		
Archery Range	The June 2020 Project included an approximately 50 ft by 100 ft archery range along the western edge of the Project site in a generally northwest-southeast orientation. The range would include temporary bumpers that will be set up along the eastern and western sides of the range to contain any stray arrows and associated impacts associated with retrieval of lost arrows.	Size increase and addition of landscaping (see Table 3 below)
Amphitheater and Fire Ring	The June 2020 Project included an approximately 150 square foot stage and seating for approximately 100 people. Additionally, a fire ring three feet in diameter will be installed. The stage and seating would be constructed of wood. Minor brush clearing and ground leveling may be required; however, the site would not require grading or significant earthwork to accommodate the amphitheater. Events at the amphitheater would likely include programmed activities (i.e. informational presentations or talent shows). Campfires contained within the fire ring would not be allowed during Red Flag days.	Relocation and landscaping of Amphitheater Establishment of 200-foot brush management radius around the fire pit.
Access/Fire Road	The June 2020 Project included minor road improvements, as necessary, to the existing dirt road servicing the Project site. No changes to the existing paved roads and parking lots, including changes to site circulation, would have occurred. Improvements to the dirt road involved minor ground leveling and pothole maintenance (i.e. decomposed granite installation) where needed. The roads were to be improved as needed to ensure safe travel within the Project site. All vehicles travelling within the Project site would be limited to 10 miles per hour and vehicles would be restricted to the existing dirt roads within the Project site.	Widening of access/fire road to 16-feet

Storage	The June 2020 Project included storage facilities that would be constructed with two large cargo containers adjacent to the new campsites; the storage containers would be inside a fenced area. Construction of the storage areas would require minor brush clearing and fence installation. The storage containers are 20 ft by 20 ft with a peak height of 12.5 ft. The storage containers would store equipment for instruction and enjoyment of the local surroundings. Additionally, the fenced and secured storage facilities would provide a secure facility to secure equipment associated with Project programming, including but not limited to mountain and road bikes, archery equipment, fishing, canoeing, zip-line equipment, and COPE course equipment. It should be noted that no hazardous materials, aside from routine maintenance and cleaning supplies, would be stored in the storage facilities	Reconfiguration and size change of storage in central mesa (see Table 3 below)
Flag Plaza	The June 2020 Project included a flag plaza with a concrete slab that would accommodate three flag poles. The flag plaza would be erected as a place of ceremony, commemoration, and communication, and would be located adjacent to the new campsites associated with the Project. The flag plaza would be approximately 30 feet (ft) by 10 ft and the flag poles would be approximately 25 ft in height.	Size increase (see Table 3 below)
COPE Stations	The June 2020 Project included a COPE Course that would include six stations (four stations at 10 ft by 20 ft, one plot at 20 ft by 30 ft, and one at 15 ft by 15 ft) and would be located adjacent to an existing trail. General activities at each station include team initiative games that would require a group of participants to plan and work together to solve a problem or accomplish a goal. Another COPE station would require the group to actively look out for each other through spotting, which increases group trust. Facilitators will frequently engage the group in reflections to encourage group discussion and learning. Most involve the team moving some or all members through or across an element made of wood and rope; each activity would be designed to be disabled when not in use. The stations would be designed in a way that guides users from one station to the next with the final station leading to the zip-line platform. When not in use, the COPE Course stations would be disassembled. Site preparation for the COPE Course stations include brush clearing and ground leveling.	Two COPE stations have been relocated to the southeast side of the access road
Camping Facilities	The June 2020 Project included establishment of seven new multipurpose campsites and rehabilitation of six existing campsites that are conducive to family-style or group camping. Each campsite would require surface preparation (i.e. site clearing and ground leveling) to adequately accommodate tents and would be located near a water source. Existing campsites, currently in disrepair, would be restored for camping purposes; work associated with the restoration of existing campsites would also require site clearing and ground leveling. It is anticipated that each campsite would be multipurpose, serving as an instructional and activity area and as a campsite. Each	Locations further refined; Size increase (see Table 3 below)

	campsite would have a small hard covered area for food and personal equipment storage with two picnic tables and would be designed to accommodate 6 to 8 people.	
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Ground disturbance resulting from the footprints of June 2020 Project and current Project features is quantified in Table 3 below. The resulting difference in ground disturbance between the two projects has been calculated to show that the Project would result in approximately 52,826.46 square feet (sq ft), (1.2 acres) or a 0.02% increase in ground disturbance than was predicted in the June 2020 MND.

Table 3 – Project Feature Footprints for June 2020 Project and Current Project

Project Feature	June 2020 Project Footprint (Sq Ft)	Current Project Footprint (Sq Ft)	Resulting Footprint Change (Sq Ft)
<i>New and Not Included in June 2020 Project Scope</i>			
Brush Management Areas*	-	-	-
Irrigation	0	13,961.83	+13,961.83
Landscaping*	-	-	-
ADA Parking Spaces	0	928.88	+928.88
Footpaths	0	775.64	+775.64
Signage	0	338.85	+338.85
<i>Altered from June 2020 Project Scope</i>			
Archery Range	5,008.21	17,614.27	+12,606.06
Amphitheater and Fire Ring	6,016.88	7,789.43	+1,772.55
Access/Fire Road	117,445.14	118,537.94	+1,092.80
Storage	903.13	1,601.87	+698.74
Flag Plaza	521.58	3,524.53	+3,002.95
COPE Stations	1,986.33	1,351.41	-634.92
Camping Facilities	9,087.12	27,370.20	+18,283.08
Total	140,968.39	193,794.85	+52,826.46
*Denotes Project features that do not have permanent impacts or whose impacts are incorporated into the footprints of other features onsite			

2.2.1 Construction Activities/Equipment

Construction of the Project is anticipated to occur in a single phase over a period of 6 months. Construction activities would be limited to the hours between 7 AM and 7 PM, Monday through Saturday to comply with the County Noise Ordinance. Construction equipment would include a concrete truck, truck mounted crane, backhoe, forklifts, augurs, a motograder for ground leveling, and hand tool for minor brush clearing. Grading and building performed during construction would be done in accordance with the grading and building permits issued by the County.

Figure 1 - June 2020 Project Site Plan

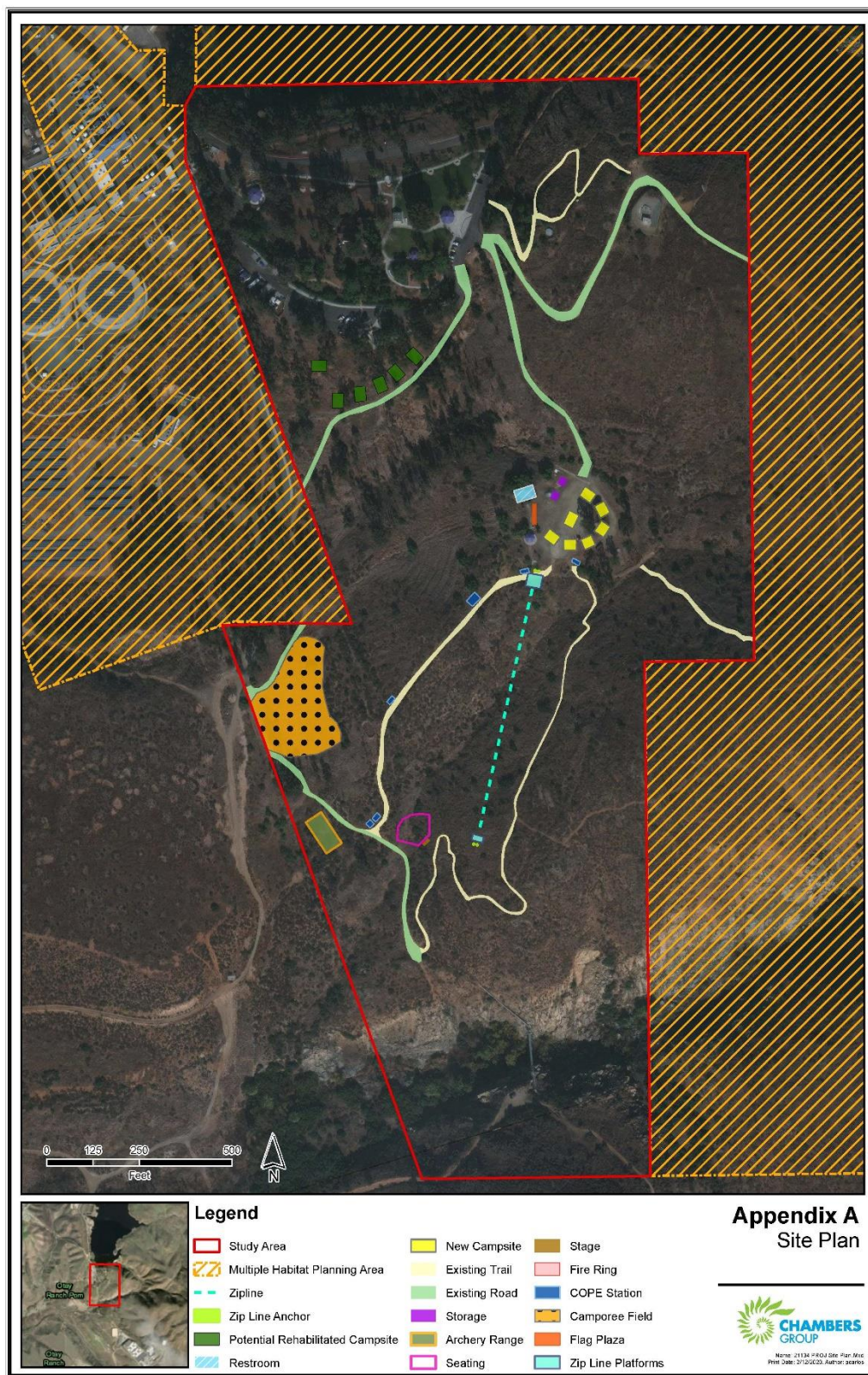
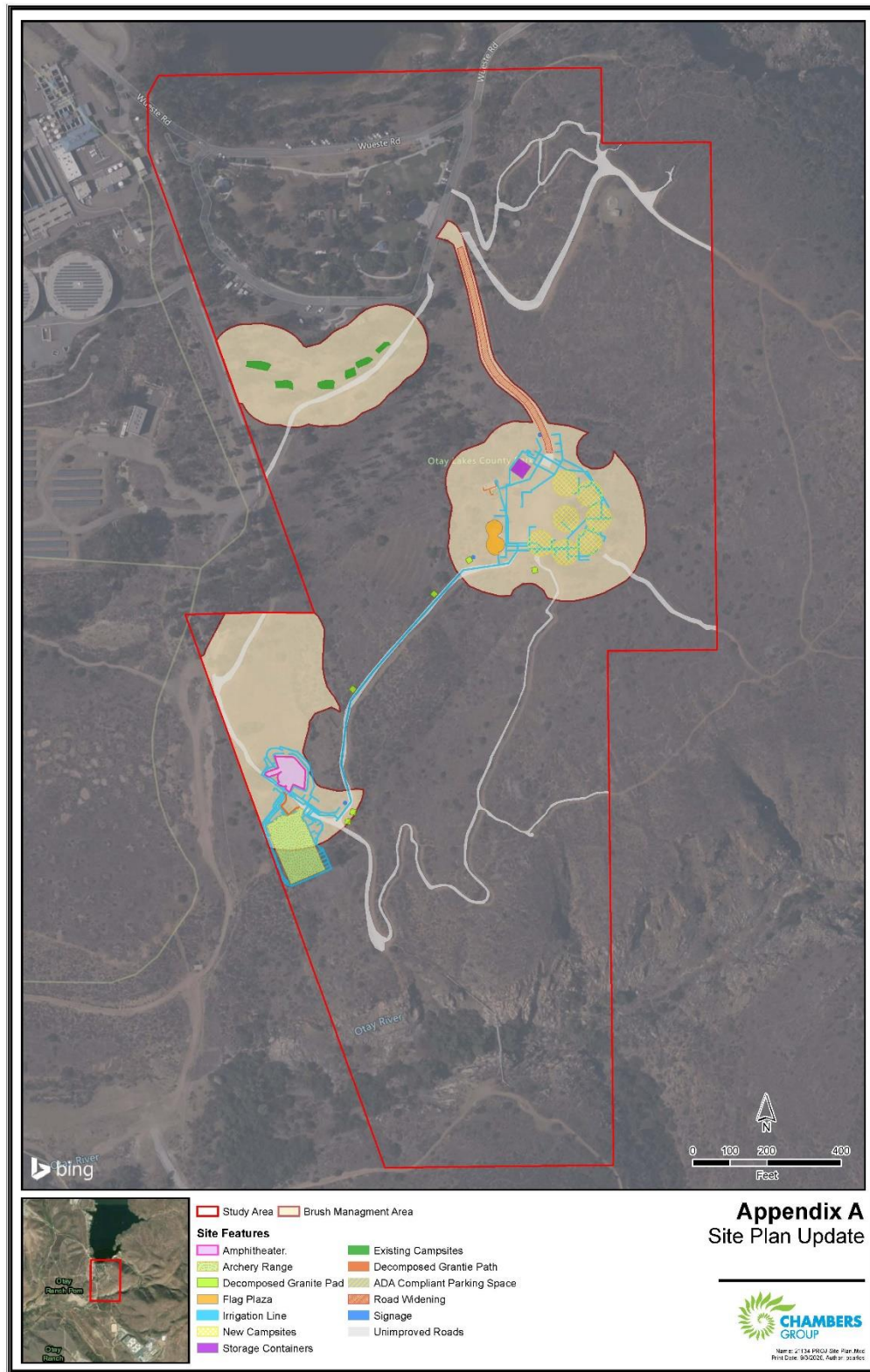


Figure 2 – Project Site Plan



SECTION 3.0 – ENVIRONMENTAL DETERMINATION

3.1 ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below would potentially be affected by this project, involving at least one impact that is a "Potentially Significant Impact," as indicated by the checklists on the following pages. For each of the potentially affected factors, mitigation measures are recommended that would reduce the impacts to less than significant levels.

<input type="checkbox"/> Aesthetics	<input type="checkbox"/> Agriculture and Forestry Resources	<input checked="" type="checkbox"/> Air Quality
<input checked="" type="checkbox"/> Biological Resources	<input checked="" type="checkbox"/> Cultural Resources	<input type="checkbox"/> Energy
<input checked="" type="checkbox"/> Geology /Soils	<input type="checkbox"/> Greenhouse Gas Emissions	<input type="checkbox"/> Hazards & Hazardous Materials
<input type="checkbox"/> Hydrology /Water Quality	<input type="checkbox"/> Land Use / Planning	<input type="checkbox"/> Mineral Resources
<input type="checkbox"/> Noise	<input type="checkbox"/> Population / Housing	<input type="checkbox"/> Public Services
<input type="checkbox"/> Recreation	<input checked="" type="checkbox"/> Transportation	<input checked="" type="checkbox"/> Tribal Cultural Resources
<input type="checkbox"/> Utilities /Service Systems	<input type="checkbox"/> Wildfire	<input checked="" type="checkbox"/> Mandatory Findings of Significance

3.2 DETERMINATION

On the basis of this initial evaluation:

The following checklist below includes information from the June 2020 MND, but includes analysis of the Project in relation to the changes described above. Application of the checklist to the Project indicates that no substantial changes are proposed in the Project that would require major revisions to the June 2020 Project Final MND. Based on the information incorporated into the *Environmental Checklist for the Camp Bashor Project*, there are no conditions associated with Project that would result in additional impacts or additional mitigation measures requiring the preparation of a subsequent or supplemental MND pursuant to §15162 through §15164 of the CEQA Guidelines.

SECTION 4.0 – EVALUATION OF ENVIRONMENTAL IMPACTS

1. A brief explanation is required for all answers except “No Impact” answers that are adequately supported by the information sources a lead agency cites. A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A “No Impact” answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
2. All answers must take account of the whole action involved, including offsite as well as onsite, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. “Potentially Significant Impact” is appropriate if substantial evidence exists that an effect may be significant. If one or more “Potentially Significant Impact” entries are marked when the determination is made, an EIR is required.
4. “Negative Declaration: Less Than Significant With Mitigation Incorporated” applies where the incorporation of mitigation measures has reduced an effect from “Potentially Significant Impact” to a “Less Than Significant Impact.” The lead agency must describe the mitigation measures and briefly explain how they reduce the effect to a less than significant level (mitigation measures from earlier analyses may be cross-referenced).
5. Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
 - a. Earlier Analysis Used. Identify and state where they are available for review.
 - b. Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c. Mitigation Measures. For effects that are “Less than Significant with Mitigation Measures Incorporated,” describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

7. Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
8. The explanation of each issue should identify:
 - a. the significance criteria or threshold, if any, used to evaluate each question; and
 - b. the mitigation measure identified, if any, to reduce the impact to less than significant.

*Note: Instructions may be omitted from final document.

SECTION 5.0 – CHECKLIST OF ENVIRONMENTAL ISSUES

5.1 AESTHETICS

1.	AESTHETICS. Except as provided in Public Resources Code Section 21099, would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 checked="" type="checkbox"/>	<input type="checkbox"/>
(c)	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 experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 checked="" type="checkbox"/>	<input type="checkbox"/>

a) Would the project have a substantial adverse effect on a scenic vista?

Less Than Significant Impact. The June 2020 MND concluded that impacts to scenic vistas would be less than significant. Neither the Otay Valley Regional Park Concept Plan nor the County General Plan specifically designated any areas within the June 2020 Project site as scenic vistas. Additionally, June 2020 Project features identified as having potential impacts to the existing viewshed were the Zip Line and the COPE Course stations. The current Project site remains the same as the June 2020 Project site, and no scenic vistas have been designated in the vicinity since certification of the June 2020 MND (County 2011; 2016). Although two COPE course stations have been relocated from the northeast side of the access road to the southeast side, these features would still be disassembled when not in use and would be relocated to approximately 100 feet southeast of the original location. Visual impacts would therefore be considerably similar to those disclosed in the June 2020 MND.

The Project also involves expansion of June 2020 Project features such as the archery range, fire/access road, fenced storage area, and flag plaza; as well as introduction of landscaping, brush management areas, structures over the tent sites, ADA parking spaces, a gravel footpath, camp signage, and irrigation (Table 2 and Table 3). These changes are not anticipated to introduce new impacts beyond those analyzed in the June 2020 MND as the Project features will remain consistent with previous views of the Project site, which has been used as a campground and park since the early 1980s. The ground footprint associated with Project features is approximately 52,826.46 square feet more than the footprint associated with June 2020 Project features (Table 3), however this increase in ground disturbance is approximately a 0.02% increase. Thus, the Project would preserve the rural appearance of the Project site.

Similar to the June 2020 Project, construction of the Project would include the use of equipment which would introduce temporary visual obstructions into the primarily natural, vegetated landscape of the Project site and surrounding area. However, the degraded visual condition would be temporary and would return to pre-construction conditions once construction is complete.

No new impacts to scenic vistas would result from the Project and no major revisions to the June 2020 MND will be required, thus impacts would remain less than significant.

- b) *Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?*

Less Than Significant Impact. In the June 2020 MND, impacts to scenic resources within a state scenic highway were determined to be less than significant. The Project site is the same area as was analyzed in the June 2020 MND and the closest designated scenic highways to the Project site remain as County-designated Otay Lakes Road and portions of State Route (SR) 94 (County 2011). The designated section of SR 94 is located between Spring Valley and Interstate 8 is approximately 11 miles north of the Project site; therefore, the Project site remains outside of the scenic highway's viewshed. Otay Lakes Road is designated as a scenic road from the City of Chula Vista limits to SR 94. This portion of Otay Lakes Road is approximately 2 miles north of the Project site, across Lower Otay Lake. The Project would be constructed south of Otay Lakes County Park, which is forested along the shore of Lower Otay Lake. Thus, the Project would not be visible from the scenic highway to the north (County of San Diego 2011a). Since the Project site is still not located within the viewshed of a scenic highway the Project would result in no new impacts, no major revisions to the June 2020 MND will be required, and impacts would remain less than significant.

- 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 experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?*

Less Than Significant Impact. Impacts to visual character and quality of public views associated with the June 2020 Project were determined to be less than significant. According to the Otay Valley Regional Park Concept Plan, the visual character of the area surrounding the Project site is primarily characterized by low-lying vegetation and gradually sloped mesas (County 2016). As previously mentioned, the June 2020 Project features with the greatest potential to impact visual character and quality were the COPE course stations and the zip line. Though, as explained in Impact a above, impacts resulting from relocation of the COPE course stations would be considerably similar to those disclosed in the June 2020 MND.

Moreover, the Project involves both expansion of certain June 2020 Project features and introduction of new Project features (see Table 2 and Table 3 in Section 2.2 Project Description). Ultimately, these changes are not anticipated to introduce new impacts beyond those analyzed in the June 2020 MND as the Project features will remain consistent with previous views of the Project site, which has been used as a campground and park since the early 1980s. Further, the ground footprint associated with Project features is approximately 0.02% larger than the footprint associated with April 2020 Project features (Table 3). This minimal increase in ground disturbance helps preserve the rural appearance

of the Project site. Despite modifications to the June 2020 Project, no major revisions to the June 2020 MND will be required, no new impacts related to the existing visual character or quality of the site and its surroundings would occur, and impacts would remain less than significant.

- d) *Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?*

Less Than Significant Impact. It was determined in the June 2020 MND that impacts on daytime and/or nighttime views due to light or glare were less than significant. The only lighting proposed in the June 2020 Project was safety lighting on the renovated restroom building. As seen in Tables 2 and 3, there are no other Project features that require lighting. Further, the Project will maintain compliance with the County Noise Ordinance, limiting construction activities associated with the Project to daytime hours (7 AM to 7 PM). Therefore, no construction lighting would be required for the Project. No new impacts to daytime or nighttime views would result from implementation of the Project, no major revisions to the June 2020 MND will be required, and impacts would remain less than significant.

5.2 AGRICULTURE & FORESTRY RESOURCES

2.	AGRICULTURE & FOREST RESOURCES. (In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(b)	Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(c)	Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

(d)	Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(e)	Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or the conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

- a) *Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?*

No Impact. The June 2020 MND concluded that the June 2020 Project would not result in impacts to Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. The Project site is located on the same parcels as analyzed in the June 2020 MND, which are still classified as Grazing Land according to the California Department of Conservation Important Farmland Finder (DOC 2020). The Project site does not currently contain Prime Farmland, Unique Farmland, or Farmland of Statewide Importance; therefore, same as the June 2020 Project, no new impacts would occur and no major revisions to the June 2020 MND will be required.

- b) *Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?*

No Impact. It was determined in the June 2020 MND that no impacts related to zoning for agricultural use or a Williamson Act contract were associated with the June 2020 Project. As mentioned above, the Project site is located within the same parcels as analyzed in the June 2020 MND. These parcels are zoned S80 and A70, which are zones intended for recreation areas and crop or animal agriculture respectively. As was true in June 2020, there are currently no active farmlands or agricultural resources within the Project site despite zoning for agricultural uses. Considering the Project still consists of outdoor recreation features with limited ground disturbance, the Project would not require changes in the Project site's land use or zoning and would not preclude the use of the site for agriculture in the future. Moreover, there are still no existing Williamson Act contracts within the Project site (DOC 2013). Thus, the Project would be consistent with the June 2020 Project, no new impacts would occur, and no major revisions to the June 2020 MND will be required.

- c) *Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?*

No Impact. No impacts to land zoned as forest land or timberland were expected to result from the June 2020 Project because the June 2020 Project site was zoned S80 and A70. As discussed in Impact b) above, the Project site is located within the same parcels as analyzed in the June 2020 MND and the zoning for these parcels has not changed. None of the parcels that make up the Project site are zoned as forest land or timberland. Parallel with the June 2020 MND, no new impacts to zoned forest land or timberland would occur as a result of the Project, and no major revisions to the June 2020 MND will be required.

d) *Would the project result in the loss of forest land or conversion of forest land to non-forest use?*

No Impact. The June 2020 MND concluded that the June 2020 Project would not cause the loss of forest land or conversion of forest land to non-forest use, resulting in no impacts. As mentioned above, the Project site is located within the same parcels as analyzed in the June 2020 MND and these parcels are still zoned S80 and A70. None of the parcels are zoned forest land or timberland. The area surrounding the Project site is primarily characterized by low-lying vegetation and gradually sloped mesas, with the main vegetation communities south of Lower Otay Reservoir being chaparral (County 2016). Additionally, the Project site has been used as a campground and park since the early 1980s, leading to ground disturbance throughout the area. As determined in the June 2020 MND, the Project would not result in the loss or conversion of forest land; no new impacts would occur, and no major revisions to the June 2020 MND will be required.

e) *Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or the conversion of forest land to non-forest use?*

No Impact. No impacts to agricultural land or forest land were expected to occur with implementation of the June 2020 Project. The Project is consistent with this determination because the Project site still does not contain forest land, would not require changes in the Project site's S80 or A70 zoning, and would not preclude the use of the site for agriculture in the future; therefore, no new impacts would occur, and no major revisions to the June 2020 MND will be required.

5.3 AIR QUALITY

3.	AIR QUALITY. Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(b)	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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(c)	Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(d)	Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

a) *Would the project conflict with or obstruct implementation of the applicable air quality plan?*

Less Than Significant Impact. The June 2020 MND determined that impacts resulting from the June 2020 Project regarding air quality plans were less than significant. The air quality plans that apply to the June 2020 Project included the San Diego Air Pollution Control District's (SDAPCD) Regional Air

Quality Strategy (RAQS) and the California State Implementation Plan (SIP). Since the Project site is located within the same parcels analyzed in the June 2020 MND, these plans would apply to the Project site. Analysis in the June 2020 MND determined that projects that propose development that is consistent with the growth anticipated by SANDAG would also be consistent with the RAQS and the SIP (Chambers 2020). The Project is consistent with the current land use designations and would not require a General Plan Amendment or zone change.

Additionally, construction and operations associated with the Project would be substantially similar to that anticipated for the June 2020 Project. Construction associated with the June 2020 Project was required to comply with SDAPCD Rules and Regulations, including Rules 50, 51, and 55, which forbid visible emissions, forbid nuisance activities, and require fugitive dust control measures, respectively. Project construction would also comply with these SDAPCD rules as the construction activities would be similar in nature. Similar to the June 2020 Project during operations, the Project would not permanently change the existing or planned transportation network or traffic patterns anywhere in the San Diego Air Basin (same as the June 2020 Project). As such, the Project would be consistent with the County General Plan and SANDAG's growth projections. Considering the Project would not introduce any new conflicts with or obstructions of implementation of applicable air quality plans, impacts would remain less than significant and no major revisions to the June 2020 MND will be required.

- 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?*

Less Than Significant Impact. The June 2020 MND concluded that impacts regarding air quality standards were less than significant for the June 2020 Project. The attainment status of criteria pollutants in the San Diego Air Basin has not changed since certification of the June 2020 MND; the Project area remains designated as a federal and/or state nonattainment area for ozone, PM₁₀, and PM_{2.5} (SDAPCD 2020). The June 2020 MND quantified construction and operational emissions to determine if the June 2020 Project would adversely affect the air quality in the region. Ultimately, the results determined that June 2020 Project activities would fall well below SDAPCD pollutant emissions thresholds (Chambers 2020). As formerly mentioned, construction and operational activities associated with the Project would be substantially similar to those anticipated for the June 2020 Project. The Project would not introduce new equipment or activities that would substantially increase pollutant emissions to levels surpassing SDAPCD thresholds. No new impacts would occur, no major revisions to the June 2020 MND will be required, and impacts would remain less than significant.

- c) *Would the project expose sensitive receptors to substantial pollutant concentrations?*

Less Than Significant Impacts. The June 2020 Project was determined to have less than significant impacts when analyzing the potential to expose sensitive receptors to substantial pollutant concentrations. The June 2020 MND identified the nearest sensitive receptors to the June 2020 Project as off-site workers at the Otay Water Treatment Plant (as near as 300 feet), County trail users (as near as 50 feet), and nearby homes (approximately 1.5 miles northwest). The Project site is located on the same area previous analyzed in the June 2020 MND and no new sensitive receptors have been identified in the vicinity (Google 2020). Further, Project construction and operations would remain

substantially similar to those proposed for the June 2020 Project, which were found to be within the SDAPCD allowable thresholds.

An additional set of pollutants that the June 2020 MND identified as potentially being problematic for nearby sensitive receptors are toxic air contaminants (TACs) created from the operation of diesel-powered equipment. Project construction would require similar equipment, consequently increasing the potential for TAC exposure for sensitive receptors. As with the June 2020 Project, to reduce impacts from TACs the Project will limit idling of equipment to no more than five minutes, require equipment operators to label each piece of equipment, and provide annual reports to the California Air Resources Board (CARB) of their fleet's usage and emissions in compliance with California Code of Regulations Title 13, Article 4.8, Chapter 9, Section 2449. The Project does not require any new equipment or activities that would markedly increase pollutant emissions. No new impacts to sensitive receptors in the area would occur, no major revisions to the June 2020 MND will be required, and impacts would remain less than significant.

- d) *Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?*

Less Than Significant Impact with Mitigation Incorporated. The June 2020 MND concluded that the June 2020 Project would result in less than significant impacts regarding odors and dust with implementation of mitigation measures MM-AQ-1 and MM-AQ-2 (Table 1). All odors and dust were anticipated to be generated from diesel equipment required for the June 2020 Project. The Project would require the same equipment for construction, thus introducing the same potential for odors and dust. No new equipment that would substantially increase odor and dust generation onsite would be required for the Project. Moreover, the Project would adhere to SDAPCD Rules 50, 51, and 55, as well as implement MM-AQ-1 and MM-AQ-2 from the June 2020P Project (Table 1) to ensure mitigation of any potential impacts associated with fugitive dust during construction and operation. No new impacts would occur, no major revisions to the June 2020 MND will be required, and impacts would remain less than significant with mitigation incorporated.

5.4 BIOLOGICAL RESOURCES

4.	BIOLOGICAL RESOURCES. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(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 U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

4.	BIOLOGICAL RESOURCES. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(c)	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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(e)	Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(f)	Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

- a) *Would the project have a substantial adverse effect, either directly or through habitat modification, on any species identified as candidate, sensitive or special status species in local or regional plans, policies or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?*

Less Than Significant with Mitigation Incorporated. The June 2020 MND concluded that impacts regarding habitat modification and candidate, sensitive, or special status species were less than significant with the implementation of mitigation measures MM-BIO-1 through MM-BIO-8. As previously discussed, the Project would be located entirely within the same parcels analyzed in the June 2020 MND. The Project, therefore, is located within the Multiple Habitat Planning Area (MHPA) Cornerstone Lands, Otay Lakes, within the City of San Diego's Multiple Species Conservation Program Subarea Plan (MSCP; City of SD 1997). Project construction and operations activities would also be substantially similar to those associated with the June 2020 Project. The main implication for habitat impacts associated with the Project is the increase in certain Project feature footprints on undisturbed habitat, which would result in direct, permanent impacts to these habitats. Table 3 in Section 2.2 reveals changes in footprint square footage associated with the Project would not significantly increase overall, increasing by 1.2 acres or approximately 0.02%. Expanded or new features are proposed to be located on previously undisturbed habitat; thus, the overall habitat impacts associated with the Project would increase from those calculated in the June 2020 MND (Table 4).

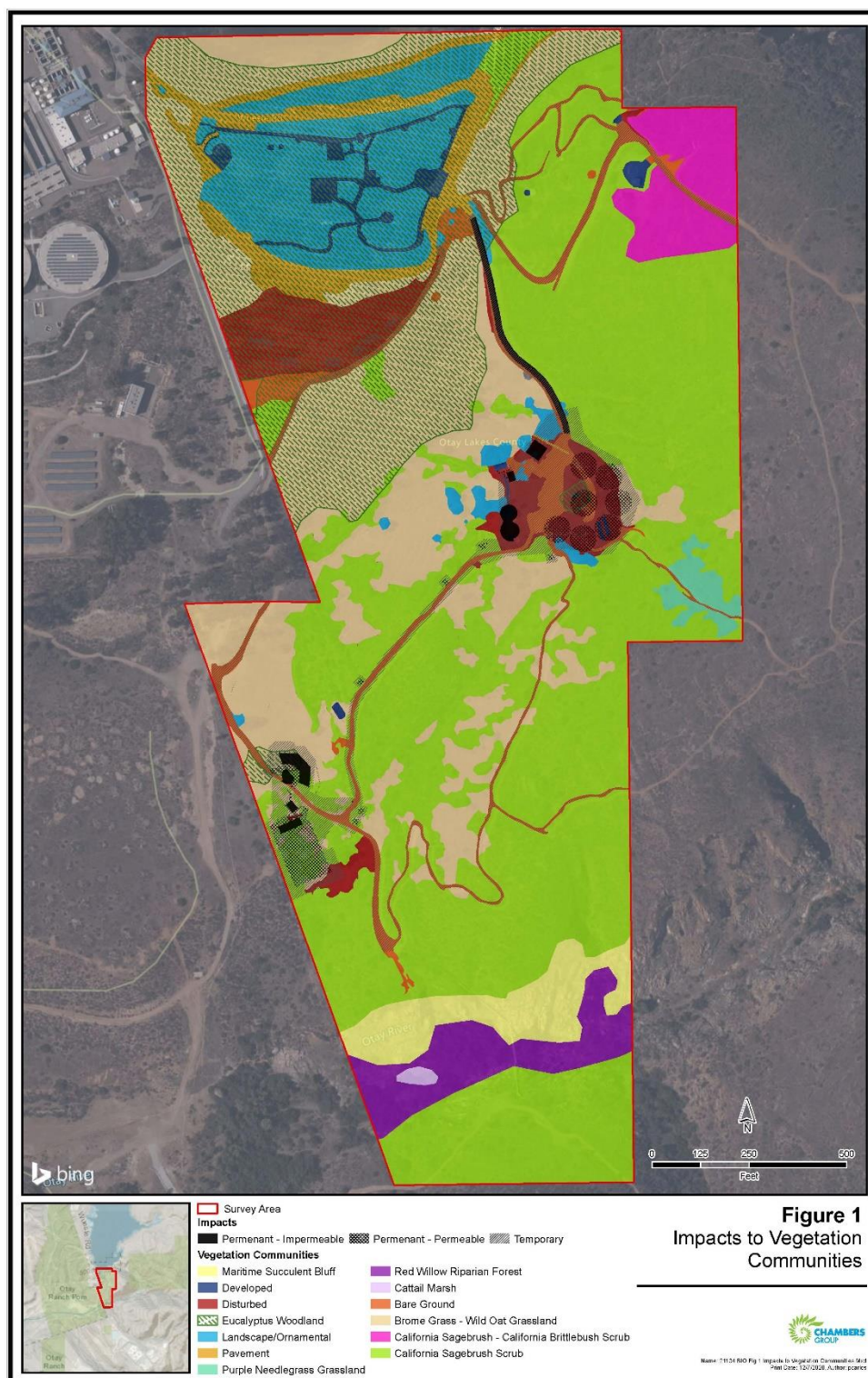
Table 4 – Summary of Permanent Habitat Impacts Associated with Project Activities

Habitat/Vegetation Community	June 2020 Project Permanent Impacts (acres)	Project Permanent Impacts (acres)
Bare Ground	1.74	0.90
Brome Grass-Wild Oat Grassland	1.39	1.84
California Sagebrush Scrub	0.48	1.55
California Sagebrush-California Brittlebrush Scrub	0.01	0.07
Eucalyptus Woodland	0.71	0.57
Disturbed	0.33	0.76
Landscape/Ornamental	0.05	0.15
Purple Needlegrass Grassland	0.03	0.05
Total	4.73	5.87

As seen in Table 4 above and Figure 3 below, permanent habitat impacts resulting from the Project would increase from approximately 4.73 acres to 5.87 acres, a difference of approximately 1.2 acres. Considering the Project site is 69 acres, this would account for a minor 0.02% increase in habitat impacts onsite. Additionally, with implementation of MM-BIO-1 through MM-BIO-8 any potential impacts resulting from this minimal loss of habitat would be mitigated (Table 1).

In regard to special status species onsite, no additional species have been identified during preliminary biological monitoring for June 2020 Project construction. This Project remains located within a designated “Take Authorized” parcel that is associated with Otay Lakes County Park. This area was previously mitigated for at the inception of San Diego County’s MSCP. The Take Authorized qualifier pertains only to species covered within the San Diego County MSCP, which does not include QCB. Project features such as the brush management areas, widened fire/access road, and irrigation system have been designed to pass through the 100-foot Quino Checkerspot Butterfly (QCB) buffer established during the June 2020 Project. These Project features would still provide a significant buffer around host plants and MM-BIO-1 would be implemented to continue to mitigate impacts related to QCB. Thus, no new significant impacts would occur, no major revisions to the June 2020 MND will be required, and impacts would remain less than significant with mitigation.

Figure 3 – Temporary and Permanent Impacts to Vegetation Communities within the Project Site



- b) *Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?*

Less Than Significant Impact. The June 2020 MND determined that impacts resulting from the June 2020 Project regarding riparian habitat or other sensitive communities were less than significant. The Project site would be located entirely within the June 2020 Project site, which contains approximately 2.15 acres of Red Willow Riparian Forest adjacent to the Otay River (Chambers 2020). Though, as with the June 2020 Project, all Project features would be strategically located outside the vicinity of this habitat. The Red Willow Riparian Forest is the only riparian habitat or sensitive natural community located within the Project site; thus, no new impacts would occur and impacts would remain less than significant. No major revisions to the June 2020 MND will be required.

- 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?*

Less Than Significant Impact. The June 2020 Project was determined to have less than significant impacts on federally protected wetlands. As mentioned above, the Project site would remain entirely within the June 2020 Project site, which is located in the 1807030410 (Otay River) watershed (Hydrologic Unit Codes [HUC-10]). This watershed is the source the Otay River, a traditionally navigable waterway (Chambers 2020). No new wetland features have been identified beyond those analyzed in the June 2020 MND (USFWS 2020). Project features have been designed to avoid wetlands and other water features onsite. Additionally, impervious surface on the Project site is expected to remain the same as the amount associated with the June 2020 Project. No new impacts would occur, no major revisions to the June 2020 MND will be required, and impacts would remain less than significant.

- d) *Would the project 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?*

Less Than Significant Impact with Mitigation Incorporated. The June 2020 MND concluded that impacts concerning migratory species resulting from the June 2020 Project would be less than significant with incorporation of mitigation measure MM-BIO-2. The Project site is located on the parcels previously analyzed for the June 2020 Project, which function as part of the Otay River Wildlife Corridor. Similar to the June 2020 Project, no direct impacts to wildlife corridors would occur as a result of the Project. None of the Project features are anticipated to be large enough to create physical barriers to wildlife movement. The quality of habitat for foraging and dispersal of wildlife may still be diminished on a temporary basis from noise during construction; however, the surrounding area consists primarily of undeveloped open space containing high-quality habitat and MM-BIO-2 would reduce potential impacts to migratory bird species in the Project area. No new impacts are expected to result from the Project; thus, impacts would remain less than significant with mitigation incorporated and no major revisions to the June 2020 MND will be required.

- e) *Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?*

No Impact. According to the June 2020 MND, no impacts concerning local policies or ordinances protecting biological resources would occur as a result of the June 2020 Project. The Project would be consistent with all relevant goals and policies of the County's MSCP, particularly the objectives focused on no-net-loss of wetlands and developing in the least sensitive habitat areas. The Project would not develop land in the area adjacent to wetlands in the southern portion of Otay Lakes County Park and Project features would be designed to occur in the least sensitive habitat areas within the parcel whenever feasible. While the Project is not permitted through the City of San Diego, and is therefore not subject to the City of San Diego MHPA Land Use Adjacency Guidelines that are identified in the MSCP Subarea Plan (City of SD 1997), the Project has been designed to conform with the Land Use Adjacency Guidelines, as follows:

- Drainage will not drain directly into the MHPA.
- Lighting of all developed areas will be directed away from the MHPA.
- Operating procedures must include noise restrictions and will consider the breeding season of sensitive species.
- Signage will be implemented to prevent errant impacts on sensitive vegetation communities.
- No invasive non-native plant species will be used within the Project.
- Development has been sited to avoid brush management into sensitive habitat.
- The soils on the Project site are primarily San Miguel-Exchequer rocky silt loam and Huerhuero loam (USDA 2020). No hydric or sensitive soils are present on site. No soils associated with vernal pools are present within the study area.

Additionally, landscaping associated with the Project would comply with the County's Landscaping Ordinance and Water Efficient Landscape Design Manual. No new impacts would occur and no major revisions to the June 2020 MND will be required.

- f) *Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservancy Conservation Plan, or other approved local, regional, or state habitat conservation plan?*

No Impact. The June 2020 Project was determined to have no impacts to conservation plans. The Project, being located on the same parcels as the June 2020 Project, is within the County MSCP South County Subarea. As described above, the Project would be consistent with all relevant goals and policies of the County's MSCP and would not introduce new impacts regarding the County MSCP.

5.5 CULTURAL RESOURCES

5.	CULTURAL RESOURCES. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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(a)	Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	<input type="checkbox"/>	<input checked="" 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(c)	Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- a) *Would the project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?*
- b) *Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?*

Less Than Significant With Mitigation Incorporated. According to the June 2020 MND, impacts resulting from the June 2020 Project regarding historical and archaeological resources were less than significant with incorporation of mitigation measure MM-CUL-1 (Table 1). The Project site is located entirely within the parcels previous analyzed for the June 2020 Project. A records search performed for the June 2020 Project revealed 62 previously recorded cultural resources within 0.5 mile of the search radius (Chambers 2020). Cultural monitoring during preliminary construction activities for the June 2020 Project have not identified any new historical or archaeological resources on the Project site. In addition, construction and operations activities associated with the Project would be substantially similar to those proposed in the June 2020 MND. Project activities would therefore not increase the potential for impacts to cultural resources, but due to potential for the presence of cultural resources onsite mitigation measure MM-CUL-1 from the June 2020 MND would be implemented. No new impacts would occur, no major revisions to the June 2020 MND will be required, and impacts remain less than significant with mitigation incorporated.

- c) *Would the project disturb any human remains, including those interred outside of formal cemeteries?*

Less Than Significant Impact With Mitigation Incorporated. The June 2020 MND concluded that impacts concerning human remains associated with the June 2020 Project were less than significant with incorporation of mitigation measure MM-CUL-2 (Table 1). The Project site is the same parcels analyzed in the June 2020 MND, which were not characterized as a formal cemetery or site near a formal cemetery. No Project activities would increase the likelihood of disturbing human remains onsite; however, in the event human remains are discovered on the Project site, MM-CUL-2 from the June 2020 MND would be implemented. No new impacts would result from the Project, no major revisions to the June 2020 MND will be required, and impacts would remain less than significant with mitigation incorporated.

5.6 ENERGY

6.	ENERGY Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(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 checked="" 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 checked="" type="checkbox"/>	<input type="checkbox"/>

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

Less Than Significant Impact. The June 2020 MND determined that construction and operation of the June 2020 Project would result in less than significant impacts on consumption of energy and energy resources. Although the Project involves alteration of some June 2020 Project features and introduction of some new Project features, the type, amount, and usage of construction equipment required for the Project is expected to be the considerable similar to that predicted for the June 2020 Project. Thus, consistent with the June 2020 Project, Project construction would not waste energy or involve activities that result in inefficient use of energy.

The main operational energy requirement for the Project will also remain the same as the June 2020 Project's main energy requirement: gasoline to transport campers to and from the Project site. No 2020 Project features were expected to have energy requirements as the safety light on the renovated restrooms was expected to be entirely run off solar power. The only new Project feature with energy requirements would be the irrigation system, which needs minimal amounts of electricity to power the controller.

The Project's energy consumption would be substantially similar to energy consumption anticipated in the June 2020 MND, with a very minor increase due to the inclusion of the irrigation systems. The Project energy consumption would still be efficient and necessary to Project construction and operations; therefore the added impacts would be less than significant and no major revisions to the June 2020 MND will be required.

- b) *Would the project Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?*

Less Than Significant Impact. The June 2020 Project was not anticipated to conflict with or obstruct any energy plans, therefore impacts were concluded to be less than significant in the June 2020 MND. Project energy consumption would be efficient and necessary, aligning with the County's Strategic Energy Plan goal to "reduce per capita energy use in the County communities by addressing energy efficiency in new construction, existing buildings, and water use" (County 2015). No new buildings would be located onsite as a result of the Project, with the sole building being the restroom proposed

in the June 2020 Project. The Project would comply with the County's Building Energy Efficiency Standards and the California Green Building Standards Code during restroom design, construction, and operation. No new impacts regarding state or local energy plans would result from implementation of the Project, thus impacts would remain less than significant.

5.7 GEOLOGY AND SOILS

7.	GEOLOGY AND SOILS. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
	i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(b)	Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 direct or indirect risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(f)	Directly or indirectly destroy a unique paleontological resource or site or unique geological feature?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- a) i) *Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.*

Less Than Significant Impact. Impacts associated with rupture of a known earthquake fault resulting from the June 2020 Project were concluded to be less than significant. As previously mentioned, the Project is located on the same parcels that were analyzed in the June 2020 MND. These parcels are not located within an active Alquist-Priolo Earthquake Fault Zone and no new fault lines have been identified in the Project vicinity since certification of the June 2020 MND. The closest fault lines to the Project site are still those identified in the June 2020 MND, approximately 0.5 mile south and 6 miles east (County 2011). Further, the two June 2020 Project features that were identified as having potential for loss, injury, or death during an earthquake fault rupture were the renovated restroom and the zip line; both of which remain unchanged as a result of the Project. No new Project features would introduce the potential for loss, injury, or death during a fault rupture; thus, no new impacts would occur, no major revisions to the June 2020 MND will be required, and impacts would remain less than significant.

ii) Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking?

Less Than Significant Impact. The June 2020 MND determined impacts resulting from the June 2020 Project regarding strong seismic ground shaking were less than significant. As mentioned in Impact a) above, the Project is located on the same parcels that were analyzed in the June 2020 MND. These parcels are not located within an active Alquist-Priolo Earthquake Fault Zone and no new fault lines have been identified in the Project vicinity since certification of the June 2020 MND. The closest fault lines to the Project site are still those identified in the June 2020 MND, approximately 0.5 mile south and 6 miles east (County 2011). Additionally, the two June 2020 Project features that were identified as having potential for loss, injury, or death during an earthquake fault rupture were the renovated restroom and the zip line; both of which remain unchanged as a result of the Project. No new Project features have the potential for loss, injury, or death if strong seismic ground shaking were to occur; thus, no new impacts would result, no major revisions to the June 2020 MND will be required, and impacts would remain less than significant.

iii) Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction?

Less Than Significant Impact. The June 2020 MND determined impacts resulting from the June 2020 Project concerning seismic-related ground failure, particularly liquefaction, were less than significant. The Project site is located entirely within the area analyzed in the June 2020 MND, which contained an area potentially prone to liquefaction in its southern portion. This liquefaction area is still present within the current Project site, but as with the June 2020 Project, features would be strategically placed outside of liquefaction zones (City of CV 2005; County 2017). No new areas prone to liquefaction have been identified in the Project vicinity. Additionally, design and construction of the new facilities would comply with all seismic-safety development requirements. No new impacts would occur, no major revisions to the June 2020 MND will be required, and impacts would remain less than significant.

iv) Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides?

Less Than Significant Impact. Impacts resulting from the June 2020 Project concerning landslides were concluded to be less than significant in the June 2020 MND. The Project site boundaries are exactly the same as the area analyzed in the June 2020 MND, which was characterized as relatively flat and not lying below any slopes steep enough to pose a risk of landslide. No new areas prone to landslides have been identified in the Project vicinity (City of CV 2005; County 2017) therefore, no new impacts would occur, no major revisions to the June 2020 MND will be required, and impacts would remain less than significant.

b) Would the project result in substantial soil erosion or the loss of topsoil?

Less Than Significant Impact. Impacts resulting from the June 2020 Project concerning soil erosion and loss of topsoil were concluded to be less than significant in the June 2020 MND. The Project site boundaries are exactly the same as the area analyzed in the June 2020 MND, where soils were characterized as primarily San Miguel-Exchequer rocky silt loam and Huerhuero loam (USDA 2020). San Miguel-Exchequer rocky silt loams have a moderate to high erosion hazard and Huerhuero loams have a moderate erosion hazard (USFWS 2014). Construction activities identified in the June 2020 MND as having the highest potential for soil erosion or loss of topsoil include minor brush clearing and ground leveling. The Project involves expansion of some of the June 2020 Project features, which would increase the amount of brush clearing and ground leveling associated with those Project features. Additionally, the Project includes establishing brush management areas throughout the site: a 200-foot radius around the fire pit, a 100-foot buffer around project features, and a 1-foot buffer on either side of the fire/access road (Table 2). The expansion of features and inclusion of brush management areas is still not expected to significantly increase soil erosion or loss of topsoil, as these activities do not require significant movement or disturbance of native soils. Further, as shown in Table 3 above, the amount of ground disturbance associated with the footprints of Project features is approximately 1.2 acres or 0.02% more than the ground disturbance expected from the June 2020 Project features.

The amount of impervious surface, resulting in opportunities for rapid stormwater runoff on the Project site, is not expected to increase compared to predictions made in the June 2020 MND. The June 2020 Project features expected to be impervious were the flag plaza, camping areas, restroom facilities, and fenced storage area. Table 3 in Section 2.2 above shows that the footprints of the flag plaza, camping areas, and fenced storage area would increase by approximately 21,984.77 square feet. Though, the camping areas associated with the Project no longer include impervious overhead roofing. The Project has added paved ADA parking spaces and a small concrete pad to the archery range, but the reduction of impacts from the loss of campsite roofing is anticipated to account for these additional features. Further, the Project will comply with the June 2020 Project's Storm Water Pollution Prevention Plan (SWPPP) through implementing stormwater best management practices (BMPs). No new impacts would occur, no major revisions to the June 2020 MND will be required, and impacts would remain less than significant.

c) Would the project 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 on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

Less Than Significant Impact. The June 2020 MND determined that impacts resulting from the June 2020 Project regarding geologic unit or soil instability would be less than significant. As discussed in

Impacts a) i) through a) iii), the Project is located on the same parcels analyzed in the June 2020 MND, none of which are located within an active or potentially active fault zone or in an area at risk of landslide. There is a small area with potential for liquefaction on the southern edge of the Project site, but all Project features will be placed strategically outside of this area (City of CV 2005; County 2011). No new impacts would occur, no major revisions to the June 2020 MND will be required, and impacts would remain less than significant.

- 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 risks to life or property?*

Less Than Significant Impact. The June 2020 MND concluded that impacts resulting from the June 2020 Project concerning expansive soils would be less than significant. The Project site is located on the same parcels as analyzed in the June 2020 MND and according to the United States Department of Agriculture (USDA) Web Soil Survey, the soils onsite remain primarily San Miguel-Exchequer rocky silt loam and Huerhuero loam (USDA 2020). San Miguel-Exchequer rocky silt loams generally have no clay sediments, but Huerhuero loams generally have a clay subsoil (USFWS 2014). Nonetheless, the County General Plan does not identify any areas within the Project site as having expansive soils and no new areas of expansive soil have been recorded in the area (County 2011). No new impacts would occur, no major revisions to the June 2020 MND will be required, and impacts would remain less than significant.

- e) *Would the project 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 waste water?*

No Impact. The June 2020 Project was determined to cause no impacts from septic tanks and alternative wastewater disposal systems, as the renovated restroom facility is expected to connect to existing park sewer infrastructure. Portable toilets are anticipated to accommodate the lower portion of the June 2020 Project site. The Project would not introduce any new Project features requiring wastewater disposal. No new impacts would occur and no major revisions to the June 2020 MND will be required.

- f) *Would the project directly or indirectly destroy a unique paleontological resource or site or unique geological feature?*

Less Than Significant Impact with Mitigation Incorporated. The June 2020 MND concluded that impacts to paleontological resources or unique geological features resulting from the June 2020 Project would be less than significant with incorporation of mitigation measure MM-PAL-1 (Table 1). The Project would be located on the same parcels that were analyzed in the June 2020 MND, which are characterized as having a high paleontological sensitivity. As with the June 2020 Project, any proposed excavation activities associated with the Project that extend deep enough to encounter previously undisturbed deposits have the potential to impact the paleontological resources. According to County guidelines, the type of paleontological monitoring required is based on the amount of excavation and the site's paleontological resource potential and sensitivity. The guidelines state that when the volume of excavation exceeds 2,500 cubic yards, the potential loss of paleontological resources is much higher than for lesser amounts of excavation (County 2007). The Project would not require more excavation than that required for the June 2020 Project, which was

calculated to be less than 2,500 cubic yards. The Project would continue to implement MM-PAL-1 from the June 2020 MND, but no new impacts would occur and impacts would remain less than significant with mitigation incorporated.

5.8 GREENHOUSE GAS EMISSIONS

8.	GREENHOUSE GAS EMISSIONS. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(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 checked="" 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 checked="" type="checkbox"/>	<input type="checkbox"/>

- a) *Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?*

Less Than Significant Impact. According to the June 2020 MND, greenhouse gas emissions resulting from the June 2020 Project would cause less than significant impacts. The June 2020 Project was predicted to emit a total of 234.49 metric tons of CO₂ equivalent (MTCO₂e) per year, which is well below the County's 900 MTCO₂e cumulatively considerable threshold (Chambers 2020). Although the Project would expand some June 2020 Project features as well as introduce some new Project features, the type, amount, and usage of construction equipment required for the Project is expected to be substantially similar to construction equipment predicted for the June 2020 Project. Additionally, operations at the Project site would not alter greenhouse gas emissions from levels predicted for the June 2020 Project. The largest source predicted for both the original and proposed project is the number of vehicles driving to and from the site, and the expansion of existing features and introduction of new features associated with the Project would not increase vehicle traffic to and from the Project site. Moreover, none of the new Project features would emit greenhouse gas emissions. Thus, the Project would not change June 2020 Project greenhouse gas emissions predictions and no new impacts would occur. No major revisions to the June 2020 MND will be required and impacts would remain less than significant.

- b) *Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?*

Less Than Significant Impact. The June 2020 MND determined the June 2020 Project would have less than significant impacts on applicable plans, policies, and regulations for the purpose of reducing greenhouse gas emissions. The County's Climate Action Plan (CAP) Consistency Review Checklist demonstrates that the June 2020 Project aligned with the goals of the County's CAP and implemented all applicable measures to reduce GHG emissions and meet reduction targets. A CAP Consistency Review Checklist has been completed for the Project and is included in Appendix A. The Project, being substantially similar in nature to the June 2020 Project, maintains consistency with the County CAP

(Appendix A). In addition, Title 24 Part 6 Building Energy Efficiency standards and the Title 24 Part 10 CalGreen standards would be applied during renovation of the restroom building proposed in the June 2020 Project and no other buildings are proposed for the Project. No new impacts would occur, no major revisions to the June 2020 MND will be required, and impacts would remain less than significant.

5.9 HAZARDS AND HAZARDOUS MATERIALS

9.	HAZARDS AND HAZARDOUS MATERIALS. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(b)	Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(c)	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"/>	<input checked="" type="checkbox"/>
(d)	Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(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 airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(f)	Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(g)	Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- a) *Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?*
- b) *Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?*

Less Than Significant Impact. The June 2020 Project was determined to have less than significant impacts concerning hazardous materials transport, use, disposal, and release. As previously

mentioned, Project construction and operations would be considerably similar to the June 2020 Project construction and operations. Implementation of the Project would therefore require the routine transport of potentially hazardous commercial materials, including but not limited to gasoline, oil, solvents, cleaners, and paint. However, as with the June 2020 Project, any potentially hazardous materials used or found on site would be handled in accordance with state and federal regulations regarding the transport, use, and storage of hazardous materials, as well as local standards set forth by the County. State and federal health and safety requirements that are intended to minimize risk to the public from hazardous materials include California Division of Occupational Safety and Health (Cal/OSHA) requirements, the Hazardous Waste Control Act, the California Accidental Release Prevention (CalARP) Program, and the California Health and Safety Code. No new hazardous materials would be introduced during the Project beyond what was proposed in the June 2020 MND and no new upset and/or accident conditions would be created. Therefore, no new impacts would occur, and no major revisions to the June 2020 MND will be required, and impacts would remain less than significant.

- c) *Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?*

No Impact. The June 2020 Project was determined to have no impacts regarding hazardous materials handling or emission within one-quarter mile of an existing or proposed school. Although the June 2020 Project involved the use of heavy equipment that was expected to generate diesel and gasoline emissions, the closest school to the June 2020 Project site was approximately 1.5 miles away. The Project is located on the same parcels analyzed in the June 2020 MND and no new schools have been built or proposed since the document's certification. No new impacts would occur and no major revisions to the June 2020 MND will be required.

- d) *Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?*

No Impact. In the June 2020 MND no impacts concerning hazardous materials sites were identified. A review of federal and state standard and supplemental databases, including the State Water Resources Control Board's Geotracker database and the Department of Toxic Substances Control's Envirostor database, indicated that the June 2020 Project site was not located within an identified hazardous material site pursuant to Government Code Section 65962.5. The Project is located on the same parcels as the June 2020 Project, and recent review of these databases revealed no new hazardous materials sites established since certification of the June 2002 MND (DTSC 2020; SWRCB 2020). No new impacts would occur and no major revisions to the June 2020 MND will be required.

- 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 airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?*

No Impact. The June 2020 MND identified no impacts concerning hazards or excessive noise associated with public airports. The Project site is located on the same parcels as previously analyzed in the June 2020 MND, which are located approximately 3.5 miles northeast of Brown Field Municipal

Airport and 17 miles southeast of San Diego International Airport. No new airports have been established in the Project vicinity since certification of the June 2020 MND. Therefore, the Project site is still not within the Airport Influence Area for the Brown Field Municipal Airport nor the San Diego International Airport. No impact would occur and no major revisions to the June 2020 MND will be required.

- f) *Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?*

Less Than Significant Impact with Mitigation Incorporated. The June 2020 MND concluded that impacts resulting from the June 2020 Project regarding adopted emergency response plans or emergency evacuation plans were less than significant with implementation of mitigation measure MM-HAZ-1 (Table 1). The Project, which remains on the parcels analyzed in the June 2020 MND, would remain located in the Savage Dam inundation zone. As with the June 2020 Project though, Project features would be strategically placed outside the inundation extent. Additionally, construction and operational activities associated with the Project would not interfere with the San Diego County Operational Area Emergency Plan or the Multi-Jurisdictional Hazard Mitigation Plan because the activities would not prohibit subsequent plans from being established or prevent the goals and objectives of existing plans from being carried out. Special events with up to 400 attendees may occur upon completion of the Project, but implementation of MM-HAZ-1 from the June 2020 MND would require BSA local councils to prepare an Emergency Action and Fire Prevention Plan detailing how council staff, volunteers, and members should respond during a crisis at these special events. No new impacts would occur as a result of the Project and no major revisions to the June 2020 MND will be required, thus impacts would remain less than significant with mitigation incorporated.

- g) *Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?*

Less Than Significant with Mitigation Incorporated. The June 2020 Project was determined to have less than significant impacts concerning exposure to wildland fires with implementation of mitigation measure MM-HAZ-1 (Table 1). The Project site is located entirely within the site analyzed in the June 2020 MND, which is located within a Very High Fire Hazard Severity Zone (VHFHSZ). No changes have been made to the boundaries of the VHFHSZ since certification of the June 2020 MND. Project construction and operations would be considerably similar to those proposed for the June 2020 Project, with the inclusion of more extensive brush management areas to further prevent the risk of fire (Table 2). The Project would also continue to implement MM-HAZ-1 from the June 2020 MND, uphold the goals of the County General Plan's Safety Element, follow the regulations in the County Consolidated Fire Code, and execute the goals of the Community Wildfire Protection Plan for Southwest San Diego County (County 2010; County 2017). Impacts concerning wildland fire would slightly decrease with the Project's inclusion of established brush management areas, but impacts would remain less than significant with mitigation incorporated.

5.10 HYDROLOGY AND WATER QUALITY

10.	HYDROLOGY AND WATER QUALITY. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(b)	Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(c)	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:				
	i) Result in substantial erosion or siltation on- or off-site;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flood on- or off-site;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	iv) Impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(d)	In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(e)	Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a) *Would the project violate any water quality standards or waste discharge requirements, or otherwise substantially degrade surface or ground water quality?*

Less Than Significant Impact. The June 2020 Project concluded that the County would be required to comply with SWRCB's National Pollutant Discharge Elimination System (NPDES) General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities (General Construction Permit). Compliance with the General Construction Permit requires the development of a SWPPP by a qualified SWPPP developer, the elimination or reduction of non-stormwater discharge off site into storm drainage systems or other water bodies, and the implementation of BMPs throughout the construction period. Construction of the Project would be substantially similar to the June 2020 Project, and would also be required to develop a SWPPP. The SWPPP requires a description of the Project site; identification of sources of sediment and other pollutants that may affect the quality of stormwater discharges; and a list of BMPs to provide sediment and erosion control, waste handling measures, and non-stormwater management. The specific BMPs that would be implemented with the Project would be identified during development of the SWPPP, which would

occur concurrently with final Project design and be completed prior to construction. Compliance with the SWPPP would ensure that construction activities would not degrade the surface water quality of receiving waters to levels that would exceed the standards considered acceptable by the San Diego Regional Water Quality Control Board or other regulatory agencies. No new impacts would occur, and no major revisions to the June 2020 MND will be required, and impacts would remain less than significant.

- 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?*

No Impact. The June 2020 Project noted that the Project would not use groundwater to fulfill water requirements which would be mostly required for the renovated restrooms. The Project would not introduce any new features onsite that would require the use of groundwater. The irrigation system associated with the Project would be connected to the existing Otay Lakes County Park water infrastructure, which utilizes the City of San Diego PUD's Water System. As such, the Project would not deplete groundwater supplies or interfere substantially with groundwater recharge. No new impacts would occur and no major revisions to the June 2020 MND will be required.

- c) *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:*
- i) *result in substantial erosion or siltation on- or off-site;*
 - ii) *substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;*
 - iii) *create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources or polluted runoff; or*
 - iv) *impede or redirect flood flows?*

Less Than Significant Impact. The June 2020 MND determined that June 2020 Project impacts regarding drainage patterns on the site or area were less than significant. Like the June 2020 Project, the majority of construction activities associated with the Project include minor ground leveling and brush clearing that would occur in compliance with the County grading permit. The Project involves expansion of some of the June 2020 Project features, which would increase the amount of brush clearing and ground leveling associated with those Project features. Additionally, the Project includes establishing brush management areas throughout the site: a 200-foot radius around the fire pit, a 100-foot buffer around Project features, and a 1-foot buffer on either side of the fire/access road (Table 2). The expansion of features and inclusion of brush management areas is still not expected to significantly increase soil erosion or drainage patterns onsite, as these activities do not require significant movement or disturbance of soils. Further, as shown in Table 3 in Section 2.2, the amount of ground disturbance associated with the footprints of Project features is approximately 0.02% larger than the ground disturbance expected from the June 2020 Project features.

Additionally, the Project would not install a significant amount of additional impervious surfaces. The June 2020 Project features expected to be impervious were the flag plaza, camping areas,

restroom facilities, and fenced storage area. The restroom facilities would remain unchanged as a result of the Project, but Table 3 in Section 2.2 above shows that the footprints of the flag plaza, camping areas, and fenced storage area would increase by approximately 21,984.77 square feet. The Project has also added paved ADA parking spaces and a small concrete pad to the archery range. Although the camping areas associated with the Project no longer include impervious overhead roofing, expansion and introduction of new Project features would increase the amount of impervious surface onsite by approximately 18,595 square feet or approximately 0.43 acre. However, none of the Project features would result in substantial alteration of the existing drainage pattern of the site. Additionally, no stream or river courses exist within the Project site. The Otay River is located directly south of the Project site, but BMPs would be implemented during construction in compliance with the SWPPP and the General Construction Permit issued for the Project, which would ensure that erosion and siltation do not result in any offsite water quality impacts. All disturbed buffer areas would be restored to pre-Project conditions once construction has been completed.

A minimal increase (approximately 0.02%) in ground disturbance is expected as a result of Project implementation, but no new impacts would occur. Impacts would remain less than significant and no major revisions to the June 2020 MND will be required.

- d) *Would the project in flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?*

Less Than Significant Impact. The June 2020 Project noted that the Project site is located approximately 12 miles east of the coast of the Pacific Ocean but is approximately 0.25 mile from Savage Dam on the Lower Otay Reservoir. The June 2020 Project concluded that there is minimal risk of flood, tsunami, or seiche releasing pollutants due to inundation. The Project as proposed would be entirely within the June 2020 Project site and therefore no new impacts would occur, and impacts would remain less than significant.

- e) *Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?*

Less Than Significant Impact. The June 2020 MND concluded that June 2020 Project impacts related to water quality control plans and sustainable groundwater management plans were less than significant. As noted above in Impact b) above, the Project would not introduce new impacts on groundwater resources; therefore, the Project would not result in an impact associated with a sustainable groundwater management plan.

As described in Impact a) above, compliance with the General Construction Permit and the SWPPP would ensure that construction activities would not result in the degradation of surface water quality of receiving waters to levels that would exceed the standards considered acceptable by the San Diego Regional Water Quality Control Board or other regulatory agencies. BMPs implemented through the SWPPP would align with the County's BMP Design Manual and would ensure consistency with the County's Jurisdictional Runoff Management Program (JRMP). Additionally, the amount of stormwater runoff from the site would not change substantially after implementation of the Project due to the limited amount of impervious surface. Table 3 in Section 2.2 above shows that the footprints of the flag

plaza, camping areas, and fenced storage area would increase by approximately 21,984.77 square feet. The Project has also added paved ADA parking spaces and a small concrete pad to the archery range. However, expansion and introduction of new Project features would nominally increase the amount of impervious surface onsite by approximately 0.43 acre. Therefore, with the implementation of both construction and permanent BMPs, the Project would not introduce new impacts to obstruct any water quality control plan. Impacts would remain less than significant and no major revisions to the June 2020 MND will be required.

5.11 LAND USE AND PLANNING

11.	LAND USE/PLANNING Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(b)	Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a) *Would the project physically divide an established community?*

No Impact. The June 2020 MND noted the Project would not physically divide an established community and would not include features that would preclude mobility across the Project site. The uses onsite will remain as open space. The changes associated with the Project would not result in a new barrier in the community. The Project as proposed would result in minor changes to the June 2020 Project that would also not physically divide an established community. No new impacts would occur and no major revisions to the June 2020 MND will be required.

b) *Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?*

No Impact. The June 2020 MND concluded that the uses associated with the June 2020 Project would be consistent with the applicable plans including zoning and General Plan Land Use Element. The Project as proposed would result in minor changes to the June 2020 Project and no component of the Project, once operational, would have the potential to conflict with adjacent land uses. No new impacts would occur and no major revisions to the June 2020 MND will be required.

5.12 MINERAL RESOURCES

12.	MINERAL RESOURCES Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact

(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"/>	<input checked="" 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"/>	<input checked="" type="checkbox"/>

a) *Would the project 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?*

No Impact. The Project Site is entirely within the site for the June 2020 Project, which is not within an area of known mineral resources and no mineral resource extraction or other mining operations. Similar to the June 2020 Project, the Project would not include any mining activities that would result in the loss of availability of known mineral resources. Additionally, similar to the June 2020 Project, the current land use precludes mineral extraction at the Project site and land use would not change as a result of the Project. Therefore, the Project would not result in a new impact associated with mineral resource availability, and no major revisions to the June 2020 MND will be required.

b) *Would the project 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?*

No Impact. As noted above in Impact a), the Project site is not mapped within an area of known mineral resources and no mineral resource extraction or other mining operations currently occur within the Project site. The current land use precludes mineral extraction at the Project site and land use would not change as a result of the Project. Similar to the June 2020 Project, no mining or mineral extracting activities are proposed. No new impacts would occur and no major revisions to the June 2020 MND will be required.

5.13 NOISE

13.	NOISE Would the project result in:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(b)	Generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(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 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"/>	<input checked="" type="checkbox"/>

A noise analysis was completed for the June 2020 Project, which outlined potential noise levels associated with June 2020 Project construction and operational activities. The Project site is the same as was analyzed in the previously approved June 2020 MND. The construction and operational activities associated with the Project are substantially similar to those analyzed in the June 2020 MND and are not anticipated to significantly increase previous noise impact results.

San Diego County Noise Ordinance

Section 36.409 of the County's Municipal Code prohibits construction activities from causing, at or beyond the property line of any property zoned residential, an average sound level greater than 75 decibels during the 12-hour hour period from 7:00 a.m. and 7:00 p.m. All construction activities for the Project would occur during the allowable hours for construction activities that are detailed in Section 36.408 of the County's Municipal Code.

- 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?*

Less Than Significant Impact. The June 2020 MND concluded that the June 2020 Project construction noise impacts would be within the County's 75 dBA construction noise standard. Additionally, it was concluded that although the June 2020 Project would introduce new noise sources, such as the proposed amphitheater and new camp sites, the nearest homes are approximately 1.5 miles away, which are not anticipated to be impacted by any of the proposed noise sources. The additional vehicle trips would also result in less than significant impacts.

Construction and operation of the Project would be largely similar to that of the June 2020 Project and therefore there would be no new impacts associated with an increase in noise. Impacts would remain less than significant and no major revisions to the June 2020 MND will be required.

- b) *Would the project result in generation of excessive groundborne vibration or groundborne noise levels?*

Less Than Significant Impact. The June 2020 MND concluded that a loaded truck operating off-road would create the highest vibration levels during project construction. However, it was found that this construction-related vibration levels would be within the 0.25 inch-per-second PPV threshold. Construction of the Project as proposed, would be largely similar to that of what was previously proposed in the June 2020 MND and therefore would not result in additionally impacts from vibration. Operation of the Project would be largely similar to the June 2020 Project which was determined to not create any known vibration sources. As such, no new impacts would occur and impacts would remain less than significant.

- 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 two miles of a public airport or public us airport, would the project expose people residing or working in the project area to excessive noise levels?*

No Impact. The Project site is located approximately 3.5 miles northeast of Brown Field Municipal Airport and 17 miles southeast of San Diego International Airport. The Project site is not within the Airport Influence Area for the Brown Field Municipal Airport nor the San Diego International Airport; therefore, no impact would occur.

5.14 POPULATION AND HOUSING

14.	POPULATION AND HOUSING. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(b)	Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a) Would the project induce substantial unplanned 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)?

No Impact. The June 2020 MND concluded that the June 2020 Project would not directly or indirectly induce population growth and therefore, no impacts would occur. The Project would be substantially similar to the June 2020 Project and would not directly or indirectly induce population growth. As such, no new impacts would occur and no major revisions to the June 2020 MND will be required.

b) Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

No Impact. The June 2020 MND concluded that the Project would exist within the Park boundaries and the Park does not contain any housing units. As such, no existing housing units or people would be removed or displaced. The Project is largely similar to the June 2020 Project, and therefore, the Project would not require the construction of replacement housing elsewhere. No impact would occur and no major revisions to the June 2020 MND will be required.

5.15 PUBLIC SERVICES

15.	PUBLIC SERVICES.	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact

(a)	Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
	i) Fire Protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	ii) Police Protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	iii) Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	iv) Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	v) Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

- a) i) *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection?*
- a) ii) *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police protection?*

Less Than Significant Impact. The June 2020 MND noted that although the Project would result in additional users accessing the park for temporary use, the Project would maintain compliance with the County General Plan's Safety Element. The June 2020 MND concluded that the distances between the closest Police Station and County Fire Station were under the maximum allowable emergency travel time for rural lands. As the Project would be located within the boundaries of the June 2020 Project and would not increase the estimate attendance that was previously proposed, the Project would not require new or physically altered, Police or Fire Stations. Additionally, similar to the June 2020 Project, in the case of special events being held at the Project site, with up to 400 attendees, the BSA policies would require preparation of an Emergency Action and Fire Prevention Plan for each event. This plan would ensure acceptable service ratios and response times for fire and police protection. Additionally, the majority of attendees would be dropped off at special events in a coordinated fashion, preventing the risk of vehicles blocking emergency access routes. Consequently, no new impacts would occur, no major revisions to the June 2020 MND will be required, and impacts would remain less than significant.

- a) iii) *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for schools?*
- a) iv) *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for parks?*

- a) v) *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for other public facilities?*

Less Than Significant Impact. Similar to the June 2020 Project, the Project would not result in an increase in a permanent population within the Project site or surrounding areas; implementation of the Project would not induce permanent population growth in any way. However, also similar to the June 2020 Project, the Project would result in additional users accessing the Park. As the Project would not increase the estimate attendance that was previously proposed, the Project would not require new or physically altered, school, park or any other public facilities. Similar to the June 2020 Project, the site will only be in use during the programmed activities and when other local community groups reserve use of the Project site through BSA. Consequently, no new impacts would occur, no major revisions to the June 2020 MND will be required, and impacts would remain less than significant.

5.16 RECREATION

16.	RECREATION. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(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 checked="" type="checkbox"/>	<input type="checkbox"/>
(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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- 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?*

Less Than Significant Impact. The Project would slightly alter the June 2020 Project by altering the size and location of the proposed facilities within the Project site and eliminating others. Changes to Project features are not intended to accommodate more users and are only to account for unanticipated design needs following the contractor's arrival onsite. Thus, implementation of the Project would not increase the number of visitors to the Project site beyond those expected from the June 2020 Project. Nonetheless, to counteract any potential for physical deterioration of the facility, the Project activities would be aligned with goals of the County General Plan's Conservation and Open Space Element. Similar to the June 2020 Project, the Project would be designed to avoid special status species, and the use of proposed camp facilities would include public outreach and education on the surrounding natural habitat in order to be consistent with the County's Goals. The majority of users of the Project site would be associated with BSA and would be managed and scheduled by the BSA to prevent misuse of the site and its facilities and to reduce environmental impact. Similar to the June

2020 Project, the Project would not result in an increase in use that would result in physical deterioration. No new impacts would occur, no major revisions to the June 2020 MND will be required, and impacts would remain less than significant.

- 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?*

Less Than Significant With Mitigation Incorporated. Similar to the June 2020 Project, the Project involves the rehabilitation and expansion of recreational facilities in the form of a camping facility and associated outdoor features intended for the engagement of boy scouts and the local community to the natural environment in the County of San Diego. The Project does not include the construction or operation of recreational facilities in addition to activities analyzed in the June 2020 MND. The Project would implement similar mitigation measures as the June 2020 MND to ensure that the construction and/or improvement of recreational facilities would remain less than significant. These mitigation measures include, MM-AQ-1 and MM-AQ-2, MM-BIO-1 through MM-BIO-8, MM-CUL-1 and MM-CUL-2, MM-HAZ-1, MM-PAL-1, MM-TRA-1, and MM-TRC-1. The Project would provide an additional recreational facility in the region, which would reduce overall demand on the existing infrastructure, thereby reducing deterioration of existing facilities. No new impacts would occur, no major revisions to the June 2020 MND will be required, and impacts would remain less than significant with mitigation.

5.17 TRANSPORTATION

17.	TRANSPORTATION. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadways, bicycle and pedestrian facilities?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(b)	Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(c)	Substantially increase hazards due to a geometric 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"/>	<input checked="" type="checkbox"/>
(d)	Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

A Traffic Scoping Memorandum (Memo) and Parking and On-site Circulation Review Letter (Letter) were prepared by Linscott Law & Greenspan Engineers (LLG) in May 2019 and September 2019 were prepared for the June 2020 Project. The trip generation data in the Memo and Letter was based on the total number of users (campers/attendees and staff), which is not expected to increase with implementation of the Project.

- a) *Would the project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadways, bicycle and pedestrian facilities?*

Less Than Significant Impact With Mitigation Incorporated. The June 2020 Project found that construction activities would not impede non-motorized travel or public transportation in the immediate vicinity of the Project site because all construction would occur within the existing park boundary. Any temporary traffic control during construction would meet the requirements of the California Manual on Uniform Traffic Control Devices (Caltrans 2014). Construction of the Project would be largely similar to the June 2020 Project and would also meet the requirements of the California Manual on Uniform Traffic Control Devices and therefore no new impacts would occur and impacts would be less than significant.

Operation of the June 2020 Project was analyzed for traffic impacts. It was concluded that the weekday trip generation calculations forecast 176 ADT with 88 AM and 22 PM peak hour trips. Although the weekday ADT is less than 200 trips which may correlate to the preparation of an Issue Specific Traffic Impact Study (TIS), the 88 AM peak hour trips exceed the threshold for a Focused TIS. However, as emphasized in the trip generation section of the Memo, the peak weekday trip generation would only be expected to occur during a limited four-week period when summer camps are offered and ambient traffic volumes on the surrounding street network would be expected to be lower. The Memo and Letter also determined there is ample queuing space for drop-offs and pickups during programmed activities with use of the southerly-east-west drive aisle which is currently gated-off from public use. The June 2020 Project also analyzed parking which was found to be sufficient with its existing 62 available parking spaces during normal operating times. For Special events and overnight camping the June 2020 Project proposed the mitigation measure MM-TRA-1.

The Project would result in substantially similar construction and operation as the June 2020 Project. Similar to the June 2020 Project, the Project would also implement existing Mitigation Measure MM-TRA-1, however, no new impacts would occur that were not previously analyzed. Impacts would remain less than significant.

b) Would the project Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

Less Than Significant Impact. The County Report Format and Content Requirements for Transportation and Traffic states that a Project that generates less than 200 ADT, in most cases, will not result in direct traffic impacts (County 2011). The June 2020 Project concluded that with a maximum of 176 ADT generated from day camp drop-offs and pick-ups, day camps are therefore not expected to have significant traffic impacts. Special events would generate a maximum of 528 ADT, though these events would only occur 4 to 6 times per year so impacts would be temporary. The Project would be substantially similar to the June 2020 Project and no new impacts would occur. Impacts would remain less than significant and no major revisions to the June 2020 MND will be required.

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)?

No Impact. Similar to the June 2020 Project, the Project does not include design features or new uses that would change the existing traffic operations. Construction activities would not significantly affect circulation and would not increase hazards due to design features of incompatible uses. If construction traffic control is required, flagging personnel would ensure that traffic congestion or

blocked roads do not occur. Therefore, the Project would not increase hazards due to design features or incompatible uses and no impacts would occur.

d) *Would the project result in inadequate emergency access?*

Less than Significant Impact. The June 2020 Project concluded that less than significant impacts regarding emergency access would occur during construction. The June 2020 MND found that emergency access to the Project site would remain the same as the existing condition as all construction staging would occur within the Project site and a limited number of construction vehicles would be required. Construction of the Project would remain relatively similar and therefore no new impacts would occur.

Operational activities at the Project site would be the same as the activities associated with the June 2020 Project and implementation of MM TRA-1 from the June 2020 MND would reduce parking-related impacts to less than significant. Thus, circulation is not anticipated to be significantly affected by the Project and the Project would not result in inadequate emergency access. No new impacts would occur, no major revisions to the June 2020 MND will be required, and impacts would remain less than significant.

5.18 TRIBAL CULTURAL RESOURCES

18.	TRIBAL CULTURAL RESOURCES. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(b)	A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

a) *Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?*

- b) *Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?*

Less Than Significant With Mitigation Incorporated. The June 2020 Project conducted AB 52 consultation on June 12, 2019. The tribes included in the AB 52 notification process included: Barona Band of Mission Indians, Jamul Indian Village, Iipay Nation of Santa Ysabel, Kwaaymii Laguna Band, Sycuan Band of the Kumeyaay Nation, Viejas Band of Kumeyaay Indians, Campo Band of Mission Indians, and the Manzanita Band of Kumeyaay Nation. The County received three responses from Jamul Indian Village, Iipay Nation of Santa Ysabel, and Viejas Band of Kumeyaay Indians. The County met with the Jamul Indian Village and Iipay Nation of Santa Ysabel on June 7th and the Viejas Band of Kumeyaay Indians on July 16th. All consultation was closed prior to the June 2020 Project approval. Due to the potential for resources to be found the June 2020 Project proposed the mitigation measure MM-TCR-1 (Table 1).

The Project would involve a similar amount of ground disturbance and would be within the footprint of the June 2020 Project. Similar to the June 2020 Project, the Project would also implement existing Mitigation Measure MM-TCR-1, however, no new impacts would occur that were not previously analyzed. Impacts would remain less than significant and no major revisions to the June 2020 MND will be required.

5.19 UTILITIES AND SERVICE SYSTEMS

19.	UTILITIES/SERVICE SYSTEMS. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(b)	Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(c)	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 checked="" type="checkbox"/>	<input type="checkbox"/>

19.	UTILITIES/SERVICE SYSTEMS. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(d)	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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(e)	Comply with federal, state, and local management and reduction statutes and regulations related to solid wastes?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

- a) *Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or expansion of which could cause significant environmental effects?*

Less Than Significant Impact. The June 2020 MND concluded the Project would not require relocation or construction of new utilities for wastewater, stormwater, electric power, natural gas, or telecommunications. Water and wastewater needs for the June 2020 Project were associated with the proposed renovated restroom and portable toilets. The Project does not propose any alterations to the restroom renovation or portable toilet use, and the restroom is still expected to connect to existing park water and sewer infrastructure. The Project would introduce a new irrigation system onsite, but the irrigation systems would connect to the existing park water infrastructure. Further, the Project's irrigation system would not generate substantial wastewater as water usage would be minimal and any anticipated runoff would percolate into the groundwater system. Additionally, the Project would comply with the SWPPP which would involve incorporation of temporary stormwater drainage BMPs during construction activities to ensure that permanent stormwater drainage facilities would not be expected. No new Project features would require electric power, natural gas, or telecommunications. The Project would result in the same uses as the June 2020 Project and would not result in increased population. No new impacts would occur and no major revisions to the June 2020 MND will be required.

- 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?*

Less Than Significant Impact. The June 2020 MND concluded that the majority of water use would be associated with the renovated restrooms, but overall, the current water system would remain viable to serve the Project site. The Project would include the installation of an irrigation system that would connect to the existing water main line. Water needs associated with the irrigation system would be considerably less than the requirements of the previously proposed restroom, and therefore would not substantially increase the water usage. Similar to water anticipated for the June 2020 Project's restroom, water for the irrigation system would be connected to the existing Otay Lakes County Park water infrastructure, which utilizes the City of San Diego PUD's Water System. Impacts to water supply would be incrementally greater, however, impacts would remain less than significant, and no major revisions to the June 2020 MND will be required.

- c) *Would the project 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?*

Less Than Significant Impact. The June 2020 MND concluded that the majority of water use would be associated with the renovated restrooms and therefore a majority of the wastewater generation would also be associated with the renovated restrooms. The Project as proposed would not alter the plans for the restroom from those proposed in the June 2020 MND. The County has reached an agreement with the City of Chula Vista to tie into the municipal sewer system north of the Project. Until this sewer system is connected, the Project would utilize the repurposed septic system. As proposed in the June 2020 Project, portable toilets would be used on the south portion of the Project site, especially during special events, to avoid a significant increase in wastewater. A new irrigation would be installed as a result of the Project, but the irrigation system would not generate substantial wastewater as water usage would be minimal and any anticipated runoff would percolate into the groundwater system. The Project would not result in any uses that would generate a significant increase in wastewater. Impacts to the wastewater system would be incrementally greater, however impacts would remain less than significant and no major revisions to the June 2020 MND will be required.

- d) *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?*

Less Than Significant Impact. The June 2020 Project assumed that the amount of waste generated during construction would be minimal and easily accommodated by the County's permitted solid waste capacity, which is predicted to be available through 2059 (County 2017b). Additionally, although solid waste would increase when compared to existing conditions, the additional waste is assumed to be minimal and consistent with other parts of the park that generate waste. The Project as proposed would not involve a significant increase in construction or incorporate uses that would result in increased solid waste generation when compared to the June 2020 Project. Further, the construction and operational waste would be accommodated by the County's permitted capacity. As such, no new impacts would occur, and impacts would remain less than significant.

- e) *Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?*

Less than Significant Impact. Similar to the June 2020 Project, all activities associated with construction and operation of the Project, would comply with all City, county, and State solid waste diversion, reduction, and recycling mandates, including compliance with AB 1826 and AB341. The Project would also align with the goals of County of San Diego Strategic Plan to Reduce Waste. No new impacts would occur and no major revisions to the June 2020 MND will be required.

5.20 WILDFIRE

20.	WILDFIRE. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 checked="" 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 to the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(d)	Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a) Would the project impair an adopted emergency response plan or emergency evacuation plan?

Less Than Significant Impact. The June 2020 MND concluded that the Project site is within a VHFHSZ; however, the Project would not impact an emergency response or evacuation plan according to the County's Guidelines for Determining Significance for Emergency Response Plans. Similar to the June 2020 Project, the Project would not interfere with the San Diego County Operational Area Emergency Plan or the Multi-Jurisdictional Hazard Mitigation Plan because the activities at the Project site would not prohibit subsequent plans from being established or prevent the goals and objectives of existing plans from being carried out. During construction and operation, emergency access to the Project site would remain the same as the existing condition, except for during special events. In the case of a special event with up to 400 attendees, BSA local councils would be required to prepare an Emergency Action and Fire Prevention Plan detailing how council staff, volunteers, and members should respond during a crisis at the event. The Project does include the construction of a fire ring; however, no campfires would be allowed on Red Flag days and to counteract the risk of wildfire the Project would align with Goals S-3, S-4, and S-6 of the County General Plan's Safety Element. As such, no new impacts would occur, and no major revisions to the June 2020 MND will be required, and impacts would remain less than significant.

b) Would the project, 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?

Less Than Significant Impact. The June 2020 MND concluded that the Project site is within a VHFHSZ. Except for the proposed fire ring, the Project does not include any features that involve the installation

or maintenance of associated wildfire infrastructure (such as road, fuel breaks, emergency water sources, or other utilities) that may exacerbate a fire risk. As in the June 2020 Project, the fire ring would remain banned from use on Red Flag days under MM HAZ-1. Additionally, the Project would align with the Goals S-3, S-4, and S-6 of the County General Plan's Safety Element to minimize fire hazards, manage fuel loads, and ensure adequate fire and medical services.

In accordance with the policies under Goal S-3, the Project would ensure that access roads within the Project site could provide safe access for emergency equipment and civilian evacuation and that there would be multiple ingress and egress routes. To maintain consistency with the policies under Goal S-4, the BSA and the County would coordinate to create a fuel management program for the Project site. In alignment with the policies under Goal S-6, the Project site would be adjacent to Lower Otay Lake, which would serve as an adequate water supply to combat wildland fire, and fire services would meet the travel time standards from the closest fire station. The June 2020 MND concluded that the distance between the closest County Fire Station was under the maximum allowable emergency travel time for rural lands. As the Project would be located within the boundaries of the June 2020 Project, the Project would also be under the maximum allowable emergency travel time. Furthermore, the Project includes establishment of brush management areas including a 200-foot radius around the fire pit, 100-foot buffer around other project features (in addition to the fire pit), and 1-foot buffer on either side of the fire road (Table 2 and Table 3). These brush management areas will require removal of potential fuel for wildfires, contribute to an overall reduction in wildfire potential on the Project site. As such, no new impacts would occur, and impacts would remain less than significant.

- c) *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 risk or that may result in temporary or ongoing impacts to the environment?*

Less Than Significant Impact. The June 2020 MND concluded that the Project site is within a VHFHSZ. Except for the fire ring, which would not be in use during Red Flag days, the Project would not involve the construction or maintenance of any new infrastructure that may increase fire risk. Similar to the June 2020 Project, to reduce the risk onset from the fire ring, the Project would align with the Goals S-3, S-4, and S-6 of the County General Plan's Safety Element to minimize fire hazards, manage fuel loads, and ensure adequate fire and medical services. The Project would ensure that access roads within the Project site could provide safe access for emergency equipment and civilian evacuation, that there would be multiple ingress and egress routes. Additionally, the BSA and the County would coordinate to create a fuel management program for the Project site. The BSA also incorporate fire safety into their curriculum and are required to prepare an Emergency Action and Fire Prevention Plan for the camp and each special event held at the Project site with implementation of MM-HAZ-1 above (BSA 2019). As such, no new impacts would occur, no major revisions to the June 2020 MND will be required, and impacts would remain less than significant.

- d) *Would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability or drainage changes?*

Less Than Significant Impact. The June 2020 MND noted that the Project site is in an area categorized as generally susceptible to landslides, which is the lowest ranking on the State scale of generally susceptible to marginally susceptible to most susceptible. Similar to the June 2020 Project, the Project

is strategically designed to avoid the moderate to high soil slip risk area along the southern border and the FEMA 100-year floodway and County 100-year floodway to the north. As such, the Project would not result in any changes, no major revisions to the June 2020 MND will be required, and impacts would remain less than significant.

5.21 MANDATORY FINDINGS OF SIGNIFICANCE

21.	MANDATORY FINDINGS OF SIGNIFICANCE.	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(b)	Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects?)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(c)	Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- a) *Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?*
- b) *Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects?)*

Less Than Significant Impact with Mitigation Incorporated. The Project site is completely within the boundaries of the June 2020 Project which was found to be located within a designated "Take Authorized" parcel, under the association of Otay Lakes County Park. This area was previously mitigated for at the inception of San Diego County's MSCP. Therefore, cumulative impacts associated with biological resources would be less than significant. Additionally, all potentially significant impacts can be reduced to less than significant via the implementation of mitigation measures and would not result in any new impacts when compared to the June 2020 Project. The cumulative impacts

associated with the Project remain less than significant with mitigation incorporated, and no major revisions to the June 2020 MND will be required.

- c) *Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?*

Less Than Significant Impact With Mitigation Incorporated. Similar to the June 2020 Project, all environmental impacts associated with implementation of the Project can be reduced to less than significant with implementation of mitigation measures. The Project would not result in significant impacts on human beings, either directly or indirectly, with implementation of mitigation measures and would not result in any new impacts when compared to the June 2020 Project. This impact is less than significant with mitigation incorporated, and no major revisions to the June 2020 MND will be required.

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APPENDIX A – CAP Consistency Checklist





Permit Number: _____

COUNTY OF SAN DIEGO
LAND USE AND ENVIRONMENT GROUP
Department of Planning & Development Services

Appendix A: Draft Climate Action Plan

Consistency Review Checklist

Introduction

The County of San Diego (County) Climate Action Plan (CAP), adopted by the Board of Supervisors on [DATE], outlines actions that the County will undertake to meet its greenhouse gas (GHG) emissions reduction targets. Implementation of the CAP will require that new development projects incorporate more sustainable design standards and implement applicable reduction measures consistent with the CAP. To help plan and design projects consistent with the CAP, and to assist County staff in implementing the CAP and determining the consistency of proposed projects with the CAP during development review, the County has prepared a CAP Consistency Review Checklist (Checklist). This Checklist, in conjunction with the CAP, provides a streamlined review process for proposed discretionary projects that require environmental review pursuant to the California Environmental Quality Act (CEQA). Please refer to the County's Guidelines for Determining Significance for Climate Change (Guidelines) for more information on GHG emissions, climate change impact requirements, thresholds of significance, and compliance with CEQA Guidelines Section 15183.5.

The purpose of this Checklist is to implement GHG reduction measures from the CAP that apply to new development projects. The CAP presents the County's comprehensive strategy to reduce GHG emissions to meet its reduction targets. These reductions will be achieved through a combination of County initiatives and reduction actions for both existing and new development. Reduction actions that apply to existing and new development will be implemented through a combination of mandatory requirements and incentives. This Checklist specifically applies to proposed discretionary projects that require environmental review pursuant to CEQA. Therefore, the Checklist represents one implementation tool in the County's overall strategy to implement the CAP. Implementation of measures that do not apply to new development projects will occur through the implementation mechanisms identified in Chapter 5 of the CAP. Implementation of applicable reduction measures in new development projects will help the County achieve incremental reductions towards its targets, with additional reductions occurring through County initiatives and measures related to existing development that are implemented outside of the Checklist process.

The Checklist follows a two-step process to determine if projects are consistent with the CAP and whether they may have a significant cumulative impact under the County's adopted GHG thresholds of significance. The Checklist first assesses a project's consistency with the growth projections and land use assumptions that formed the basis of CAP emissions projections. If a project is consistent with the projections and land use assumptions in the CAP, its associated growth in terms of GHG emissions would have been accounted for in the CAP's projections and project implementation of the CAP reduction measures will contribute

towards reducing the County's emissions and meeting the County's reduction targets. Projects that include a land use plan and/or zoning designation amendment that would result in an equivalent or less GHG-intensive project when compared to existing designation, would also be within the projections assumed in the CAP. Projects responding in the affirmative to Step 1 questions can move forward to Step 2 of the Checklist. If a land use and/or zoning designation amendment results in a more GHG-intensive project, the project is required to demonstrate consistency with applicable CAP measures and offset the increase in emissions as described in the Guidelines. Step 2 of the Checklist contains the CAP GHG reduction measures that projects are required to implement to ensure compliance with the CAP. Implementation of these measures would ensure that new development is consistent with relevant CAP strategies and measures and will contribute towards achieving the identified GHG reduction targets. Projects that are consistent with the CAP, as determined using this Checklist, may rely on the CAP for the cumulative impacts analysis of GHG emissions under CEQA.

A project's incremental contribution to cumulative GHG emissions may be determined to not be cumulatively considerable if it is determined to be consistent with the CAP. As specified in the CEQA Guidelines, the mere existence of significant cumulative impacts caused by other projects alone shall not constitute substantial evidence that the project's incremental effects are "cumulatively considerable" (CCR, Title 14, Division 6, Chapter 3, Section 15064[h][4]). Projects requiring discretionary review that cannot demonstrate consistency with the CAP using this Checklist may have a cumulatively considerable contribution to a significant cumulative impact and would be required to prepare a separate, more detailed project-level GHG analysis as part of the CEQA document prepared for the project.

Checklist Applicability

This Checklist only applies to development projects that require discretionary review and are subject to environmental review (i.e., not statutorily or categorically exempt projects) pursuant to CEQA. Projects that are limited to ministerial review and approval (e.g., only building permits) would not be subject to the Checklist. The CAP contains other measures that, when implemented, would apply broadly to all ministerial and discretionary projects. These measures are included for discretionary projects in this Checklist, but could also apply more broadly once the County takes action to codify specific requirements or standards.

Checklist Procedures

General procedures for Checklist compliance and review are described below. Specific guidance is also provided under each of the questions under Steps 1 and 2 of the Checklist in subsequent pages.

1. The County's Department of Planning & Development Services (PDS) reviews development applications and makes determinations regarding environmental review requirements under CEQA. Procedures for CEQA can be found on the County's [Process Guidance & Regulations/Statutes Homepage](#). The Director of PDS will determine whether environmental review is required, and if so, whether completion of the CAP Checklist is required for a proposed project or whether a separate project-level GHG analysis is required.
2. The specific applicable requirements outlined in the Checklist shall be required as a condition of project approval.
3. The project must provide substantial evidence that demonstrates how the proposed project will implement each applicable Checklist requirement described herein to the satisfaction of the Director of PDS.

4. If a question in the Checklist is deemed not applicable (N/A) to a project, substantial evidence shall be provided to the satisfaction of the Director of PDS demonstrating why the Checklist item is not applicable. Feasibility of reduction measures for new projects was assessed in development of the CAP and measures determined to be feasible were incorporated into the Checklist. Therefore, it is expected that projects would have the ability to comply with all applicable Checklist measures.
5. Development projects requiring discretionary review that cannot demonstrate consistency with the CAP using this Checklist shall prepare a separate, project-level GHG analysis as part of the CEQA document prepared for the project and may be required to prepare an Environmental Impact Report (EIR). Guidance for project-specific GHG Technical Reports is outlined in the Report Format and Content Requirements for Climate Change document, provided under separate cover. The Report Format and Content Requirements document provides guidance on the outline and content of GHG analyses for discretionary projects processed by PDS that cannot show compliance with the CAP Checklist.

Checklist Updates

The Guidelines and Checklist may be administratively updated by the County from time to time to comply with amendments to State laws or court directives, or to remove measures that may become mandatory through future updates to State or local codes. Administrative revisions to the Guidelines and Checklist will be limited to changes that do not trigger a subsequent EIR or a supplement to the SEIR for the CAP pursuant to CEQA Guidelines Section 15162. Administrative revisions, as described above, will not require approval by the Board of Supervisors (Board). All other changes to the Guidelines and Checklist require Board approval.

Comprehensive updates to the Guidelines and Checklist will be coordinated with each CAP update (i.e., every five years beginning in 2025) and would require Board approval. Future updates of the CAP, Guidelines, and Checklist shall comply with CEQA.

Application Information

Contact Information

Project No. and Name: _____

Property Address and APN: _____

Applicant Name and Co.: _____

Contact Phone: _____ Contact Email: _____

Was a consultant retained to complete this checklist? ☐ Yes ☐ No

If Yes, complete the following:

Consultant Name: _____ Contact Phone: _____

Company Name: _____ Contact Email: _____

Project Information

1. What is the size of the project site (acres [gross and net])? _____

2. Identify all applicable proposed land uses (indicate square footage [gross and net]):

☐ Residential (indicate # of single-family dwelling units): _____

☐ Residential (indicate # of multi-family dwelling units): _____

☐ Commercial (indicate total square footage [gross and net]): _____

☐ Industrial (indicate total square footage [gross and net]): _____

☐ Agricultural (indicate total acreage [gross and net]): _____

☐ Other (describe): _____

3. Provide a description of the project proposed. This description should match the project description used for the CEQA document. The description may be attached to the Checklist if there are space constraints.

CAP Consistency Checklist Questions

Step 1: Land Use Consistency

For projects that are subject to CAP consistency review, the first step in determining consistency is to assess the project's consistency with the growth projections used in the development of the CAP. This section allows the County to determine a project's consistency with the land use assumptions used in the CAP.

Step 1: Land Use Consistency		
Checklist Item (Check the appropriate box and provide explanation and supporting documentation for your answer)	Yes	No
1. Is the proposed project consistent with the existing General Plan regional category, land use designations, and zoning designations?	<input type="checkbox"/>	<input type="checkbox"/>
<p>Project Detail: Please substantiate how the project satisfies question 1.</p> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/>		
<p>If "Yes," proceed to Step 2 (CAP Measures Consistency) of the Checklist.</p> <p>If "No," proceed to question 2 below.</p>		
2. Does the project include a land use element and/or zoning designation amendment that would result in an equivalent or less GHG-intensive project when compared to the existing designations?	<input type="checkbox"/>	<input type="checkbox"/>
<p>Project Detail: Please substantiate how the project satisfies question 2.</p> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/>		
<p>If "Yes," the project must provide estimated project GHG emissions under both existing and proposed designation(s) for comparison to substantiate the response and proceed to Step 2 (CAP Measures Consistency) of the Checklist.</p> <p>If "No," the project must prepare a separate, more detailed project-level GHG analysis, as outlined in the County's Guidelines for Determining Significance for Climate Change and Report Format and Content Requirements for Climate Change, to demonstrate how the project would offset the increase in GHG emissions over the existing designations or baseline conditions. The project must also incorporate each of the CAP measures identified in Step 2 to mitigate cumulative GHG emissions impacts. Proceed and complete a separate project-specific GHG analysis and Step 2 of the Checklist. Refer to Section 4 of the County's Guidelines for procedures on analyzing General Plan Amendments.</p>		

Step 2: CAP Measures Consistency

The second step of the CAP consistency review is to review and evaluate a project's consistency with the applicable measures of the CAP. Each checklist item is associated with a specific GHG reduction measure(s) in the County CAP.

Step 2: CAP Measures Consistency				
Checklist Item (Check the appropriate box and provide an explanation for your answer)	CAP Measure	Yes	No	N/A
Step 2A: Construction Activities (All projects with a construction component must fill out this portion of the Checklist)				
Construction Equipment				
1a. Construction Equipment <u>Residential and Non-Residential Projects that propose use of more than ten pieces of construction equipment:</u> Will 10% of construction equipment in-use during construction activities use alternative fuels such as renewable diesel, renewable natural gas, compressed natural gas or electricity?	T-3.1	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Check "N/A" only if the project does not propose any construction activities or would use fewer than 10 pieces of equipment.				
1b. Project Detail: Please substantiate how the project satisfies question 1a.				
<hr/> <hr/> <hr/> <hr/> <hr/> <hr/>				
Step 2B: Project Operations (All projects with an operational component must fill out this portion of the Checklist)				
Transportation Demand Management				
2a. Transportation Demand Management (TDM) <u>Non-Residential:</u> For non-residential projects with anticipated employment of 25 or more, will the project implement a TDM program to achieve a 15% reduction in commute vehicle miles traveled (VMT), and commit to monitoring and reporting results to demonstrate on-going compliance?	T-2.2	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
TDM components may include, but are not limited to: <input type="checkbox"/> Telecommuting <input type="checkbox"/> Car Sharing <input type="checkbox"/> Shuttle Service <input type="checkbox"/> Carpools <input type="checkbox"/> Vanpools <input type="checkbox"/> Bicycle Parking Facilities <input type="checkbox"/> Transit Subsidies				
The project may incorporate the TDM components listed above, and propose additional trip reduction measures, as long as a 15% reduction in commute VMT can be demonstrated				

Step 2: CAP Measures Consistency

Checklist Item (Check the appropriate box and provide an explanation for your answer)	CAP Measure	Yes	No	N/A
through substantial evidence.				
Check "N/A" if the project is a residential project or if the project would not accommodate more than 25 employees.				
2b. Project Detail: Please substantiate how the project satisfies question 2a.				

Shared and Reduced Parking

3a. Shared and Reduced Parking				
<p><u>Non-Residential:</u> For non-residential projects, will the project implement shared and reduced parking strategies that achieves a 10% reduction in commute VMT?</p> <p>Shared and reduced parking strategies may include, but are not limited to:</p> <p><input type="checkbox"/> Shared parking facilities</p> <p><input type="checkbox"/> Carpool/vanpool-only parking spaces</p> <p><input type="checkbox"/> Shuttle facilities</p> <p><input type="checkbox"/> Electric Vehicle-only parking spaces</p>	T-2.4	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Check "N/A" if the project is a residential project.				
3b. Project Detail: Please substantiate how the project satisfies question 3a.				

Building Energy Efficiency

4a. Energy Efficiency Standards for New Non-Residential Development and Zero Net Energy (ZNE) Requirements for New Residential Development:				
<p><u>Non-Residential:</u> For projects that include new non-residential construction, will the non-residential component of the project achieve a 10% greater building energy efficiency than required by the 2016 State energy efficiency standards in Title 24, Part 6 of the California Code of Regulations? For projects for which building permits would be issued after January 1, 2030, will the non-residential portion of the project achieve zero net energy (ZNE) performance, in accordance with standards, specifications or guidance issued by the California Energy Commission under Title 24 of the California Code of Regulations?</p>	E-1.1	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<u>Residential:</u> For projects that include new residential construction for which building				

Step 2: CAP Measures Consistency

Checklist Item (Check the appropriate box and provide an explanation for your answer)	CAP Measure	Yes	No	N/A
permits would be issued after January 1, 2020, will the residential portion of the project achieve ZNE performance, in accordance with standards, specifications or guidance issued by the California Energy Commission under Title 24 of the California Code of Regulations?				
Check "N/A" if the project is a residential project for which building permits will be issued prior to January 1, 2020.				

4b. Project Detail:

Please substantiate how the project satisfies question 4a.

Water Heating Systems

5a. Electric or Alternately-Fueled Water Heating Systems

Residential: For projects that include residential construction, will the project, as a condition of approval, install the following types of electric or alternately-fueled water heating system(s)? Please check which types of system(s) will be installed:

- ☐ Solar thermal water heater
- ☐ Tankless electric water heater
- ☐ Storage electric water heaters
- ☐ Electric heat pump water heater
- ☐ Tankless natural gas water heater
- ☐ Other

E-1.2

☐
☐
☐

Check "N/A" if the project does not contain any residential buildings.

5b. Project Detail:

Please substantiate how the project satisfies question 5a.

Renewable Electricity

6a. Renewable Electricity

Non-Residential: For new non-residential projects, will the project provide 100% of the project's expected annual electricity use through rooftop photovoltaic panels or other onsite renewable sources, or procure 100% renewable electricity from a utility purveyor?

E-2.2

☐
☐
☐

Check "N/A" only if the project does not contain any non-residential buildings.

6b. Project Detail:

Step 2: CAP Measures Consistency

Checklist Item (Check the appropriate box and provide an explanation for your answer)	CAP Measure	Yes	No	N/A
Please substantiate how the project satisfies question 6a.				

Water-Efficient Appliances and Plumbing Fixtures

7a. Water Efficient Appliances and Plumbing Fixtures

Residential: For new residential projects, will the project comply with all of the following water efficiency and conservation BMPs¹?

- ☐ Kitchen Faucets: The maximum flow rate of kitchen faucets shall not exceed 1.5 gallons per minute at 60 psi. Kitchen faucets may temporarily increase the flow above the maximum rate, but not to exceed 2.2 gallons per minute at 60 psi, and must default to a maximum flow rate of 1.5 gallons per minute at 60 psi².
- ☐ Energy Efficient Appliances: Install at least one qualified ENERGY STAR dishwasher or clothes washer per unit.

W-1.1

☐
☐
☐

Check "N/A" if the project is a non-residential project.

7b. Project Detail:

Please substantiate how the project satisfies question 7a.

Rain Barrel Installations

8a. Rain Barrel Installations

Residential: For new residential projects, will the project make use of incentives to install one rain barrel per every 500 square feet of available roof area?

Check "N/A" if the project is a non-residential project; if State, regional or local incentives/rebates to purchase rain barrels are not available; or if funding for programs/rebates has been exhausted.

W-2.1

☐
☐
☐

8b. Project Detail:

Please substantiate how the project satisfies question 8a.

¹ CALGreen Tier 1 residential voluntary measure A4.303 of the [California Green Building Standards Code](#).

² Where complying faucets are unavailable, aerators or other means may be used to achieve reduction.

Step 2: CAP Measures Consistency

Checklist Item (Check the appropriate box and provide an explanation for your answer)	CAP Measure	Yes	No	N/A
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Reduce Outdoor Water Use

9a. Reduce Outdoor Water Use

Residential: Will the project submit a Landscape Document Package that is compliant with the County's Water Conservation in Landscaping Ordinance³ and demonstrates a 40% reduction in current Maximum Applied Water Allowance (MAWA) for outdoor use, as outlined below?

Maximum Applied Water Allowance for Residential Compliance (gallons/year) ⁴				
Regional Area	Size of Landscaped Area			
	500-999 Square Feet	1,000-1,499 Square Feet	1,500-1,999 Square Feet	2,000-2,499 Square Feet
Coastal	9,484	14,231	18,977	23,724
Coastal Corridor	9,484	14,231	18,977	23,724
Inland	10,445	13,872	20,903	26,127
Desert	15,412	23,125	30,838	38,552

Non-Residential: Will the project submit a Landscape Document Package that is compliant with the County's Water Conservation in Landscaping Ordinance and demonstrates a 40% reduction in current MAWA for outdoor use, as outlined below?

Maximum Applied Water Allowance for Non-Residential Compliance (gallons/year) ⁵				
Regional Area	Size of Landscaped Area			
	500-999 Square Feet	1,000-1,499 Square Feet	1,500-1,999 Square Feet	2,000-2,499 Square Feet
Coastal	7,760	11,643	15,527	19,411
Coastal Corridor	7,760	11,643	15,527	19,411
Inland	8,546	12,823	17,069	21,377
Desert	12,610	18,920	25,231	31,542

Check "N/A" if the project does not propose any landscaping.

W-1.2

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9b. Project Detail:

Please substantiate how the project satisfies question 9a.

³ [San Diego County Water Efficient Landscape Design Manual, Appendix B.](#)

⁴ Values in the table reflect a 40% reduction in the County's current MAWA. See [Appendix A of the San Diego County Water Efficient Landscape Design Manual](#) for definitions of Regional Areas.

⁵ Values in the table reflect a 40% reduction in the County's current MAWA. See [Appendix A of the San Diego County Water Efficient Landscape Design Manual](#) for definitions of Regional Areas.

Step 2: CAP Measures Consistency

Checklist Item (Check the appropriate box and provide an explanation for your answer)	CAP Measure	Yes	No	N/A

Agricultural and Farming Operations⁶

10a. Agricultural and Farming Equipment

Will the project use the San Diego County Air Pollution Control District's (SDAPCD's) farm equipment incentive program to convert gas- and diesel-powered farm equipment to electric equipment?

Check "N/A" if the project does not contain any agricultural or farming operations; if the SDAPCD incentive program is no longer available; or if funding for the incentive program has been exhausted.

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10b. Project Detail:

Please substantiate how the project satisfies question 10a.

11a. Electric Irrigation Pumps

Will the project use SDAPCD's farm equipment incentive program to convert diesel- or gas-powered irrigation pumps to electric irrigation pumps?

Check "N/A" if the project does not contain any agricultural or farming operations; if the SDAPCD incentive program is no longer available; or if funding for the incentive program has been exhausted.

A-1.2

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11b. Project Detail:

Please substantiate how the project satisfies question 11a.

Tree Planting

12a. Tree Planting

Residential: For residential projects, will the project plant, at a minimum, two trees per

A-2.1

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⁶ Existing agricultural operations would not be subject to questions 10 and 11 of the Checklist, unless a proposed expansion is subject to discretionary review and requires environmental review pursuant to CEQA.

Step 2: CAP Measures Consistency

Checklist Item (Check the appropriate box and provide an explanation for your answer)	CAP Measure	Yes	No	N/A
every new residential dwelling unit proposed?				
Check "N/A" if the project is a non-residential project.				
12b. Project Detail: Please substantiate how the project satisfies question 12a.				