

# **ADDENDUM TO THE OTAY LAKES CAMPGROUND PROJECT INITIAL STUDY/MITIGATED NEGATIVE DECLARATION (SCH No. 2020019003)**

**PREPARED FOR:**



## **County of San Diego**

Department of Parks and Recreation  
5500 Overland Avenue, Suite 310  
San Diego, CA 92123  
Contact: Kiran Kaur  
858-966-1378

**PREPARED BY:**

ICF  
525 B Street, Suite 1700  
San Diego, CA, 92101  
Contact: Claudia Watts  
858-444-3918

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## Acronyms and Abbreviations

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AB	Assembly Bill
approved project	approved Otay Lakes Campground Project
BMP	Best Management Practice
BSA	Boy Scouts of America
CEQA	California Environmental Quality Act
PRC	California Public Resources Code
COPE	Challenging Outdoor Personal Experience
CAP	Climate Action Plan
DPR	Department of Parks and Recreation
EAP	Emergency Action Plan
EIR	Environmental Impact Report
FPP	Fire Prevention Plan
GHG	greenhouse gas
IS	Initial Study
JPA	Joint Powers Authority
JRMP	Jurisdictional Runoff Management Plan
MND	Mitigated Negative Declaration
MSCP	Multiple Species Conservation Program
NOD	Notice of Determination
project or revised project	Addendum to the Otay Lakes Campground Project
PVC	polyvinyl chloride
QCB	Quino checkerspot butterfly
RAQS	Regional Air Quality Strategy
ROW	right-of-way
SDAPCD	San Diego Air Pollution Control District
SANDAG	San Diego Association of Government's
SB	Senate Bill
SIP	State Implementation Plan
SWPPP	Storm Water Pollution Prevention Plan

### 1.1 Introduction

This document comprises an Addendum to the Otay Lakes Campground Project (project or revised project) Initial Study (IS)/Mitigated Negative Declaration (MND) (State Clearinghouse No. 2020019003), adopted on June 24, 2020, by the County of San Diego Board of Supervisors. Since the adoption of the IS/MND, a new sewer force main and electrical upgrades have been proposed to service the Otay Lakes Campground. Consequently, further environmental analysis is required to address this change. The revised project is addressed in this Addendum.

The project proposes to convert the existing Otay Lakes County Park septic facility to sewer and upgrade existing electrical infrastructure at the park. The proposed sewer alignment would commence at an existing restroom facility within Otay Lakes County Park and travel north for approximately 1.3 miles, where it would connect with an existing City of Chula Vista sewer line. Electrical upgrades would occur within the Otay Lakes County Park, as needed, to support existing infrastructure. This Addendum was prepared per Section 15162 and 15164 of the California Environmental Quality Act (CEQA) Guidelines to analyze whether the changes to the approved Otay Lakes Campground Project (approved project) would result in any new or more significant environmental impacts or new mitigation measures, as compared to what was analyzed and proposed in the IS/MND.

The individual analysis of each CEQA impact is discussed in Chapter 3, *Environmental Impact Analysis*, of this Addendum. This analysis concludes that the revised project would not alter the conclusions reached in the impact analysis in the IS/MND. In sum, the project, with the proposed changes, would result in the following impacts, which are the same as those that would occur under the approved project analyzed in the IS/MND.

- No impacts on agriculture and forestry resources, land use and planning, mineral resources, and population and housing.
- Less-than-significant impacts on aesthetics, energy, greenhouse gas (GHG) emissions, hazards and hazardous materials, hydrology and water quality, noise, public services, recreation, transportation and utilities and services systems, and wildfire.
- Less-than-significant impacts, with mitigation incorporated, on air quality, biological resources, cultural resources, geology and soils, and tribal cultural resources.

The revised project would not result in any significant and unavoidable impacts under CEQA.

### 1.2 Background

The County of San Diego Department of Parks and Recreation (DPR) prepared an IS/MND for the approved project (SCH 2020019003), which was circulated for a 30-day public review period pursuant to the requirements of CEQA Section 15105. The review period gave agencies, organizations, and members of the public the opportunity to review the Draft IS/MND and provide

comments on the document and the environmental analysis presented therein. The 30-day review period commenced on January 2, 2020, and ended on January 31, 2021. The County considered all relevant comments in preparation of the Final MND, and the Final MND includes responses to the Draft MND comments and, where necessary, revisions pursuant to comments.

The Final MND for the approved project was prepared in accordance with the requirements of CEQA (California Public Resources Code [PRC] § 21000, *et seq.*) and the State CEQA Guidelines (California Administrative Code, Title 14 § 15000, *et seq.*). The purpose of the Final MND was to provide the decision-making body (i.e., County Board of Supervisors), responsible agencies, and the public with information regarding the environmental impacts of the project. The Board of Supervisors certified the Final MND on June 24, 2020, and a Notice of Determination (NOD) was filed with the County Clerk's Office and the State Clearinghouse on the same day.

Since adoption of the 2020 Final MND, a new sewer alignment has been proposed below or adjacent to Wueste Road, located north of the project site.

This Addendum analyzes the proposed sewer force main alignment, which is fully detailed in Chapter 2, *Project Description*, below.

## 1.3 Purpose of Addendum to the IS/MND

When a proposed project is changed or there are changes in the environmental setting, a determination must be made by the Lead Agency as to whether an Addendum or Subsequent/Supplemental Environmental Impact Report (EIR) or MND is needed. CEQA Guidelines Section 15162 and 15164 set forth criteria to assess which environmental document is sufficient and appropriate. The criteria for determining whether an Addendum or Subsequent/Supplemental MND should be prepared are outlined in this section. If the following statements are true, then preparation of an Addendum is appropriate.

- There are no substantial changes proposed in the project that will require major revisions of the previous environmental document due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.
- Substantial changes have not occurred with respect to the circumstances under which the project is undertaken that will require major revisions of the previous environmental document due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.
- There is no new information of substantial importance that was not known and could not have been known with the exercise of reasonable diligence at the time the previous environmental document was certified as complete or was adopted, shows any of the following:
  - The project will have one or more significant effects not discussed in the previous environmental document;
  - Significant effects previously examined will be substantially more severe than shown in the previous environmental document;
  - Mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measures or alternatives; or

- Mitigation measures or alternatives that are considerably different from those analyzed in the previous environmental document would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.
- An addendum to an adopted MND may be prepared if only minor technical changes or additions are necessary, or none of the conditions described in Section 15162 calling for preparation of a subsequent environmental document have occurred.

Based on the analysis in Chapter 3, *Environmental Impact Analysis*, of this document, the changes to the project analyzed in the IS/MND would not result in new significant impacts or substantially increase the severity of impacts previously identified in the IS/MND. Additionally, the mitigation measures set forth in the IS/MND are still applicable, and no new mitigation measures are required to mitigate the changes to the previously approved project. Therefore, the Lead Agency has determined that an Addendum to the IS/MND is sufficient and appropriate, and this environmental document has been prepared to analyze the environmental effects of the revised projects. Public review of this Addendum is not required per CEQA.



## **2.1 Project Location and Setting**

Otay Lakes County Park is located at 2270 Wueste Road in Chula Vista, San Diego County, California. The approved project is located on a 69-acre parcel of County property (APN: 644-100-19-00), within Otay Lakes County Park (Figure 1, Regional Location). The County of San Diego General Plan identifies the land use of the project site as Open Space and zoning is Open Space (S80) and Limited Agriculture (A70) (County of San Diego 2011). 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, S90 to the southeast and south, and Planned Community to the southwest and west. 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 (MSCP) Subarea Plan (City of San Diego 1997).

## **2.2 Project Modifications Since IS/MND Adoption**

The revised project would convert the existing Otay Lakes County Park septic facility to sewer and upgrade existing electrical infrastructure. The proposed sewer alignment would commence at an existing restroom facility within Otay Lakes County Park and travel north for approximately 1.3 miles where it would connect with an existing City of Chula Vista sewer line within the public right of way, as shown in Figure 2. The majority of the pipeline would traverse either below or adjacent to Wueste Road. The sewer alignment would involve approximately 6,200 linear feet of dual 2.5-inch force main in a trench up to 3 feet wide. The aboveground features associated with the sewer alignment would include manholes, cleanouts, lift stations and a grinder station at the ground surface level.

Within the approved project site, the proposed sewer collection pipe would connect to the existing upper restroom (Figure 3). As shown in Figure 4, from the upper restroom, a proposed 4-inch polyvinyl chloride (PVC) sanitary lateral would be installed and connect to an existing residence southeast of the upper restroom. A new 6-inch PVC sanitary sewer would be installed and connect to a proposed central lift station (System 1) within the project site. From System 1, the proposed sewer collection pipe would extend and connect to the existing lower restroom via a 4-inch PVC sanitary lateral. In addition, a new 6-inch PVC overflow would connect to an existing 7,500-gallon septic tank from the System. As shown in Figure 4, two proposed collection sewer force mains would extend from System 1 to two other proposed lift stations (System 2 and System 3). System 2 would connect to an existing sewer pipe via a proposed collection sewer pipe.

The electrical upgrades component of the project includes upgrades throughout the park to more adequately provide nighttime lighting and to support current operations and new recreation amenities at the park. The proposed electrical upgrade project would include replacement of non-

operable light fixtures, additional light fixtures in areas lacking adequate safety lighting, replacement of outdated electrical panels and upsizing of available power to the park.

Construction is anticipated to begin Fall/Winter 2021 and would continue for approximately 12 months. Installation of the proposed underground sewer alignment would involve trenching, removal of ornamental vegetation within the park, as well as hardscape removal and replacement (e.g., asphalt concrete, sidewalk). Construction would require use of off-road equipment including graders, dozers, loaders, rollers, paving equipment, excavators, and other similar types of equipment. All disturbed areas will be restored post-construction.

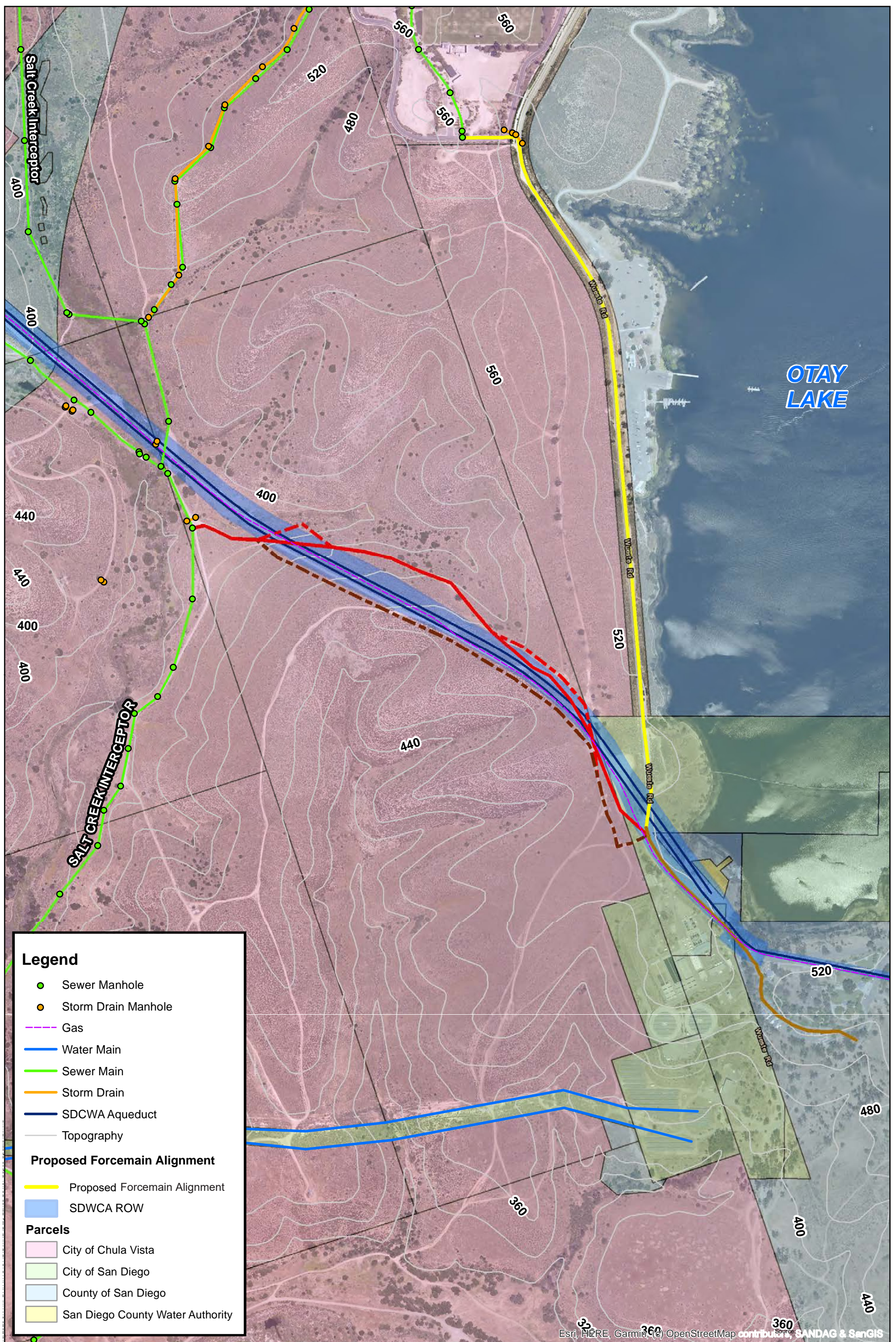
The environmental impacts associated with this change from the previously approved project are discussed in Chapter 3, *Environmental Impact Analysis*.



**Figure 1**  
**Regional Location**

**Addendum to the Otay Lakes Campground Project**

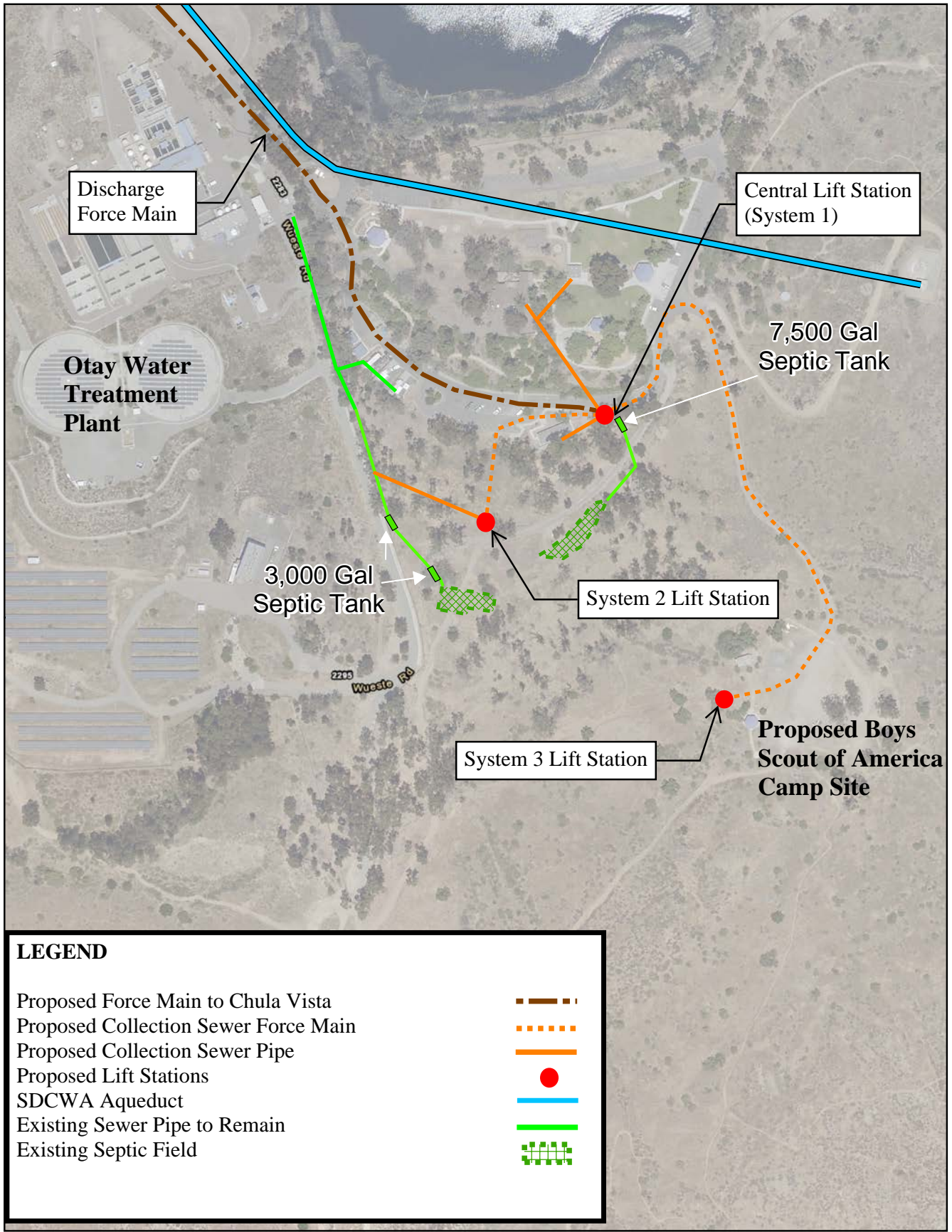




Source: Michael Baker International, 1/8/2020.

**Figure 2**  
**Proposed Forcemain Alignment**  
**Addendum to the Otay Lakes Campground Project**





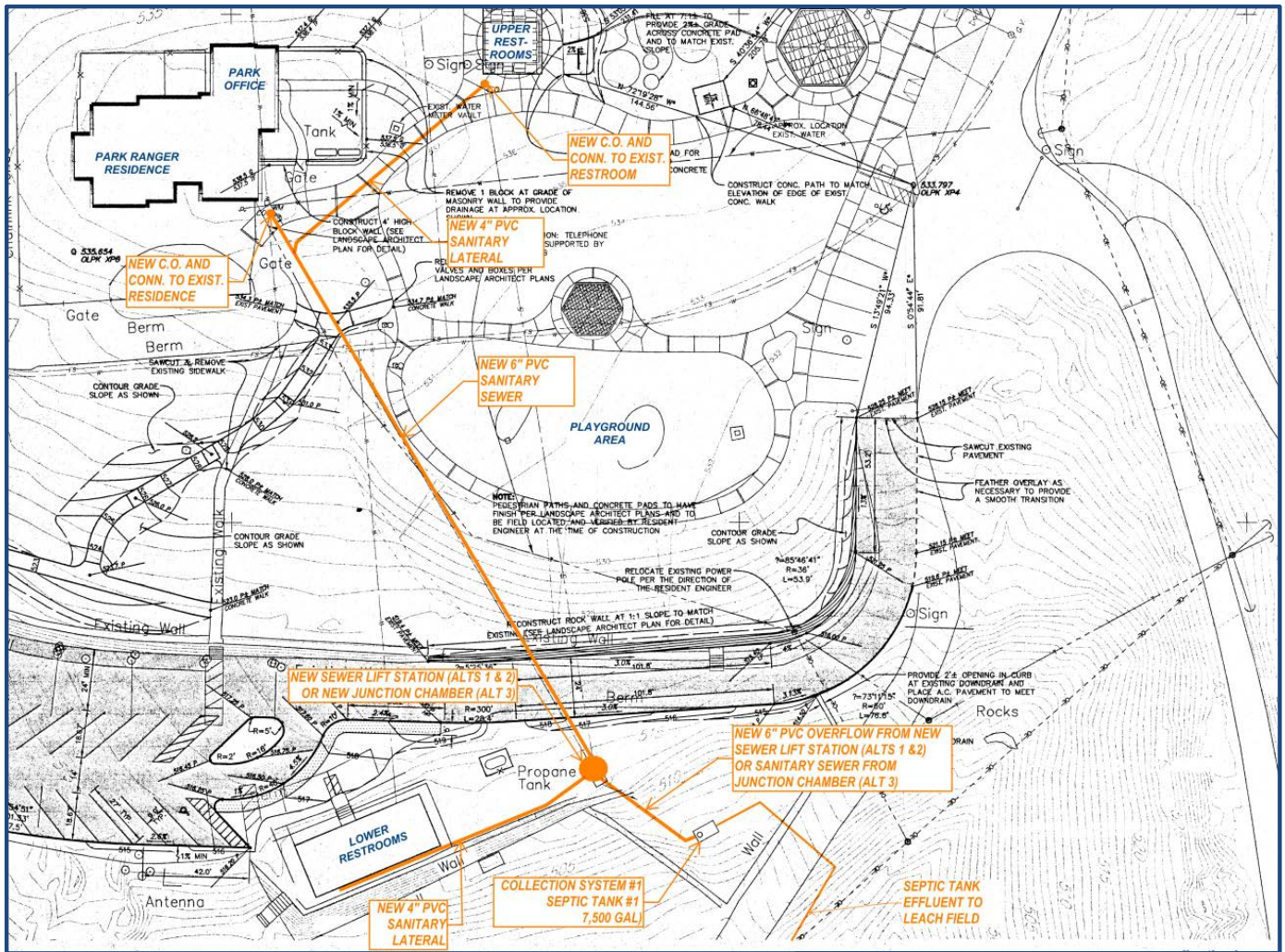
Source: Michael Baker International, 1/13/2020.



**Figure 3**  
**Proposed Sewer Collection System**  
**Addendum to the Otay Lakes Campground Project**



Figure 4 Proposed Collection System 1 Improvements



Key Map



Figure 4  
Proposed Sewer Collection System Details  
Addendum to the Otay Lakes Campground Project



Source: Michael Baker International, 1/13/2020.

## Chapter 3

# Environmental Impact Analysis

As described in Chapter 2, *Project Description*, a change to the previously approved project has been proposed since preparation of the IS/MND. As such, the following comparative analysis has been undertaken, pursuant to the provisions of CEQA Sections 15162 and 15164, to provide the factual basis for determining whether any changes in the project, change in circumstances, or new information since adoption of the IS/MND would require additional environmental review or preparation of a Subsequent IS/MND. This analysis focuses on whether the impact conclusions identified in the IS/MND would change under the revised project. The environmental analysis provided in the IS/MND remains current and applicable to the approved project in areas unaffected by the revised project for the environmental topics detailed in this section. An overview of the approved project impacts in relation to the previously adopted MND is provided in Table 1.

**Table 1. Impact Assessment Summary**

Environmental Issues	Approved MND	Revised Project	New Mitigation?	Project Resultant Impact
3.1, <i>Aesthetics</i>	Less than significant	No new impacts	No	Less than significant
3.2, <i>Agriculture and Forestry Resources</i>	No impact	No new impacts	No	No impact
3.3, <i>Air Quality</i>	Less than significant with mitigation	No new impacts	No	Less than significant with mitigation
3.4, <i>Biological Resources</i>	Less than significant with mitigation	No new impacts	No	Less than significant with mitigation
3.5, <i>Cultural Resources</i>	Less than significant with mitigation	No new impacts	No	Less than significant with mitigation
3.6, <i>Energy</i>	Less than significant	No new impacts	No	Less than significant
3.7, <i>Geology &amp; Soils</i>	Less than significant with mitigation	No new impacts	No	Less than significant with mitigation
3.8, <i>Greenhouse Gas Emissions</i>	Less than significant	No new impacts	No	Less than significant
3.9, <i>Hazards &amp; Hazardous Materials</i>	Less than significant with mitigation	No new impacts	No	Less than significant
3.10, <i>Hydrology &amp; Water Quality</i>	Less than significant	No new impacts	No	Less than significant
3.11, <i>Land Use &amp; Planning</i>	No impact	No new impacts	No	Less than significant
3.12, <i>Mineral Resources</i>	No impact	No new impacts	No	No Impact
3.13, <i>Noise</i>	Less than significant	No new impacts	No	Less than significant
3.14, <i>Population &amp; Housing</i>	No impact	No new impacts	No	No impact
3.15, <i>Public Services</i>	Less than significant	No new impacts	No	No impact
3.16, <i>Recreation</i>	Less than significant with mitigation	No new impacts	No	Less than significant
3.17, <i>Transportation</i>	Less than significant with mitigation	No new impacts	No	Less than significant
3.18, <i>Tribal Cultural Resources</i>	Less than significant with mitigation	No new impacts	No	Less than significant with mitigation

Environmental Issues	Approved MND	Revised Project	New Mitigation?	Project Resultant Impact
3.19, <i>Utilities &amp; Service Systems</i>	Less than significant	No new impacts	No	Less than significant
3.20, <i>Wildfire</i>	Less than significant with mitigation	No new impacts	No	Less than significant

## 3.1 Aesthetics

### IS/MND Conclusions

As discussed in the IS/MND, the approved project consists of the redevelopment of an existing campground, including 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, as necessary, on County property adjacent to Otay Lakes County Park, constructed within the viewshed of surrounding trails accessed from Otay Lakes County Park (Chambers 2020). The IS/MND identified that although the project site is not within an area specifically designated as a scenic vista, the *Otay Valley Regional Park Concept Plan* and *County of San Diego General Plan* emphasize the need to protect visual resources within the project area. Features of the project that were identified to have a potential visual impact included the zip-line and the COPE course stations. However, the IS/MND concluded the impact would be minimal as the COPE Course stations would be disassembled when not in use, and the zip-line would be constructed using wood or Trex®; either of these materials would likely blend into the existing environment in a way that does not significantly alter the viewshed from the project site. Construction activities and equipment would introduce temporary visual obstructions into the primarily natural, vegetated landscape of the project site and surrounding area. However, the IS/MND concluded that the degraded visual condition would be temporary and would return to preconstruction conditions after the construction is complete. Therefore, the IS/MND concluded impacts related to an adverse effect on a scenic vista were less than significant.

The IS/MND concluded that because the project site is not located within the viewshed of a scenic highway, there would be a less-than-significant impact on a scenic resource within a state scenic highway. In addition, the IS/MND identified that after construction is complete, the visual character of the site would remain the same as pre-project conditions. Therefore, impacts related to degrading the existing visual character or quality of the site and its surroundings were concluded to be less than significant.

The IS/MND identified that in accordance with the County of San Diego Noise Ordinance, construction activities associated with the approved project would occur only during daytime hours (7 a.m. to 7 p.m.). The approved project does not involve the establishment of any new lighting onsite, except for safety lighting for the restroom. The previous analysis identified that restroom light fixtures would be in compliance with lighting requirements described in Section 59.105 (Requirements for Lamp Source and Shielding) of the San Diego County Light Pollution Code. Therefore, the IS/MND concluded impacts on daytime and/or nighttime views in the area associated with light or glare to be less than significant.



## Revised Project Conclusion

The proposed change involves the installation of an underground sewer alignment within the approved project site that would extend approximately 1.3 miles to the north along Wueste Road and electrical upgrades to existing infrastructure at Otay Lakes County Park. The sewer alignment is an underground utility improvement primarily located below or adjacent to Wueste Road and on disturbed land. Electrical upgrades are limited to upgrading existing lighting features and installing safety infrastructure throughout the Otay Lakes County Park. Construction activities would be temporary and would return to preconstruction conditions after the construction is complete, with the addition of safety lighting. Therefore, the revised project would not result in additional impacts on aesthetics beyond those identified in the IS/MND. As such, the revised project would not change any of the IS/MND's findings with respect to aesthetics impacts. There is no new information, such as new regulations, a change of circumstances, or changes to the project, that would give rise to new significant environmental effects or a substantial increase in the severity of previously identified effects. This analysis does not result in any different conclusions than those reached in the IS/MND related to aesthetics, either on a project-related or cumulative basis. No new mitigation measures are required for the proposed change.

## 3.2 Agricultural and Forestry Resources

### IS/MND Conclusions

As discussed in the IS/MND, the approved project would consist of the development of existing campground facilities located on a portion of Otay Lakes County Park. The IS/MND identified the land use of the project site according to County of San Diego General Plan as Open Space, and zoning is Open Space (S80) and Limited Agriculture (A70). Despite the A70 zoning, the IS/MND determined there are no active farmlands or agricultural resources within the project site, and according to the California Department of Conservation, the project site is classified as Grazing Land and does not contain Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. Therefore, the IS/MND concluded the approved project would not conflict with or result in the conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use, and no impact would occur. Additionally, the approved project does not contain forestlands or timberland and would not conflict with existing zoning or cause rezoning of forestland, timberland, or timberland-production zones. Therefore, the IS/MND concluded no impacts would occur.

### Revised Project Conclusion

The proposed change to the project includes upgrades to existing electrical infrastructure and the installation of an underground sewer alignment within the approved project site that would extend approximately 1.3 miles to the north along Wueste Road (within the right-of-way (ROW) to connect with an existing City of Chula Vista sewer line. Although a portion of the approved project site is located on land zoned as A70, the proposed changes would not occur on land zoned for agricultural use. The proposed changes would not be located on land that contain Prime Farmland, Unique Farmland, or Farmland of Statewide Importance or land. Therefore, no potentially significant project or cumulative level conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide or Local Importance to a non-agricultural use would occur as a result of the proposed project. The site is not under a Williamson Act contract, and there would be no conflict with existing zoning for

agricultural use or a Williamson Act contract. The proposed changes would not occur in an area that contains forestlands or timberland and would not conflict with existing zoning or cause rezoning of forestland, timberland, or timberland-production zones. As such, the proposed change would not result in additional impacts on agricultural resources beyond those identified in the IS/MND. As such, the revised project would not change any of the IS/MND's findings with respect to agricultural and forestry impacts. There is no new information, such as new regulations, a change of circumstances, or changes to the project, that would give rise to new significant environmental effects or a substantial increase in the severity of previously identified effects. This analysis does not result in any different conclusions related to agricultural and forestry resources than those reached in the IS/MND, either on a project-related or cumulative basis. No new mitigation measures are required for the proposed change.

## 3.3 Air Quality

### IS/MND Conclusions

The approved project is located within the San Diego Air Pollution Control District (SDAPCD). The project was anticipated in the San Diego Association of Government's (SANDAG) growth projections used in development of the San Diego Regional Air Quality Strategy (RAQS) and State Implementation Plan (SIP). Operation of the project would result in emissions of ozone precursors that were considered as part of the RAQS based on growth projections. The operational emissions from the project would be below the screening levels and subsequently would not violate ambient air quality standards. The IS/MND concluded the project would not violate any air quality standard or contribute substantially to an existing or projected air quality violation. The approved project includes air quality emissions of particulate matter less than 2.5 microns in diameter, particulate matter less than 10 microns in diameter, nitrogen oxides, and volatile organic compounds from construction equipment exhaust and fugitive dust, as well as volatile organic compounds as the result of increase of traffic from operations at the facility. The vehicle trips generated from the project were concluded to be below the screening-level criteria. The approved project does not include uses or activities that would result in exposure of identified sensitive receptors to significant pollutant concentrations and would not expose sensitive receptors to toxic air contaminants. The approved project could produce fugitive dust as a result of construction activities and special events during operation; however, with mitigation measures **MM-AQ-1** and **MM-AQ-2** incorporated, the IS/MND identified that construction and operation of the approved project would not create substantial emissions of objectionable odors or dust affecting a substantial number of people, and impacts were concluded to be less than significant.

**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:

- 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 allow for water ponding.

## Revised Project Conclusion

The proposed change to the project includes upgrades to existing electrical infrastructure and the installation of an underground sewer alignment within the approved project site that would extend approximately 1.3 miles to the north, within the Wueste Road ROW, to connect with an existing City of Chula Vista sewer line. These changes would not result in a substantial increase in emissions associated with either project construction or operation.

Similar to the approved project, the proposed changes would require short-term construction that would result in worker, vendor, and haul trips to the project site. These vehicle trips would cease with the completion of construction, which is expected to last approximately 12 months. Construction would require use of off-road equipment including graders, dozers, loaders, rollers, paving equipment, excavators, and other similar construction equipment which would result in emissions from diesel exhaust. The proposed change would also produce fugitive dust as a result of construction activities, including site-grading and earth-movement, as well as re-entrained road dust from vehicle travel. As with the approved project, **MM-AQ-1** would be implemented to require compliance with BMPs that would reduce and avoid indirect air quality impacts due to dust generated from project construction. Based on a review of similar projects in proximity of the project site and with implementation of **MM-AQ-1**, construction-related criteria air pollutant emissions resulting from the installation of the underground sewer alignment are anticipated to be less than significant. The proposed change would not result in additional impacts associated with fugitive dust beyond those identified in the IS/MND.

The proposed changes would not result in any operational changes and would not generate additional daily trips during operation. As such, the proposed changes would be below the screening-level criteria established by the guidelines for criteria pollutants. The proposed change would not violate any air quality standard or contribute substantially to an existing or projected air quality violation.

Given the location of the project, objectionable odors associated with construction activities are not expected to affect a substantial number of people due to the distance to the closest sensitive receptor (residences approximately 0.62 mile north) and the lack of other sensitive receptors in the area. Therefore, the revised project would not change any of the IS/MND's findings with respect to air quality impacts. There is no new information, such as new regulations, a change of circumstances, or changes to the project, that would give rise to new significant environmental effects or a substantial increase in the severity of previously identified effects. This analysis does not result in any different conclusions than those reached in the IS/MND related to air quality, either on a project-related or cumulative basis. No new mitigation measures are required for the proposed change.

## 3.4 Biological Resources

### IS/MND Conclusions

As described in the IS/MND, a biological technical report dated December 2019 was prepared for the approved project. Construction and operation of the approved project would have the potential to impact sensitive species, due to habitat removal, increased land use disturbance by humans, and potential temporary fragmentation of movement corridors for various species. Implementation of **MM-BIO-1** through **MM-BIO-8** would reduce the potential impacts on federal and state-listed endangered species, and species of special concern to less than significant.

**MM-BIO-1:** The following measures will be implemented to avoid all impacts to the Quino checkerspot butterfly (QCB).

- Avoid all direct impacts on 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.
- 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 on 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 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; these areas include the entrance to and along the existing trails and roads in the northeastern portion of the campground, at the entrance to and along the existing trails and roads in the southern portion of the campground that connect the campsites to the Amphitheatre, and along the eastern edge of the campsites. Signage should clearly state that entry into the host plant area is prohibited.
- 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).

**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.

**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.

**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.

**MM-BIO-5:** Environmentally sensitive areas, including sensitive plant resources, within 20 ft. of construction areas shall be flagged for avoidance.

**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.

**MM-BIO-7:** BMPs shall be implemented to prevent new erosional features from developing in any newly contoured areas (including access roads and footpaths).

**MM-BIO-8:** Newly exposed bare ground shall be covered with native hydroseed appropriate to the immediately surrounding habitat.

The approved project would avoid sensitive habitat and would not result in significant impacts on riparian or natural communities. Project impacts on any riparian habitat or other sensitive natural community identified in the San Diego MSCP, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service are considered less than significant.

The approved project is located in the Otay River watershed, and the project site is dominated by topographical features that facilitate ephemeral drainages that eventually connect to the Otay River to the south. The IS/MND identified that project-related activities are not anticipated to affect any of the observed ephemeral drainage features or swales or the Otay River. Approved project features were designed to avoid affecting any drainage or jurisdictional features and associated habitat. Therefore, since the approved projects includes design features to avoid impacts on drainage or jurisdictional features, and associated habitat and the increased amount of impervious surfaces was identified as negligible, the IS/MND concluded impacts to be less than significant.

The IS/MND identified that the project site functions as part of the Otay River wildlife corridor for insect, amphibian, reptile, mammal, and avian species. The project site is situated on a hill outside of the Otay River floodplain and is not within the path of the wildlife corridor; however, the project site contributes to the functionality of the corridor by providing open space for foraging and dispersal of wildlife. Where the Otay River crosses through the project site, a steep, approximately 30-foot-tall cliff face separates the Otay River floodplain from approved project features, which are located approximately 250 feet north of the Otay River floodplain. This steep cliff decreases the quality of connectivity between the Otay River and the project site. The IS/MND did not identify any direct impacts on wildlife corridors because features of the approved project were not anticipated to be large enough to create physical barriers to wildlife movement. The IS/MND concluded that the quality of habitat for foraging and dispersal of wildlife may 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 with the implementation of **MM-BIO-2**, potential impacts on migratory bird species in the project area would be reduced to less than significant. Additionally, the IS/MND identified that the project is located within the San Diego MSCP (City of San Diego 1998) County of San Diego Subarea Plan (County of San Diego 1997, "South County Plan"), in a parcel designated as "Take Authorized" that does not require additional biological mitigation for covered species for development to occur. Therefore, indirect impacts on wildlife movement corridors as a result of the approved project were concluded to be less than significant with mitigation incorporated.

The IS/MND identified that the approved project would be consistent with the goals and policies of the County's MSCP Subarea Plan and would be situated in the least sensitive habitat areas. In addition, the IS/MND noted that although the project is not permitted through the City of San Diego, and is therefore not subject to the City of San Diego Multi-Habitat Planning Area Land Use Adjacency Guidelines, the approved project has been designed to conform with those Guidelines. Therefore, the IS/MND concluded that the approved project would not result in an impact associated with a local policy protecting biological resources such as an adopted Habitat Conservation Plan or Natural Community Conservation Plan.

## Revised Project Conclusion

The proposed change involves upgrades to existing electrical infrastructure and the installation of an underground sewer alignment within the approved project site that would extend approximately 1.3 miles to the north, within the ROW, along Wueste Road to connect with an existing City of Chula Vista sewer line. The revised alignment for the project is immediately west of the southwestern corner of Lower Otay Lake.

ICF conducted focused surveys for sensitive biological resources in 2020-2021 and prepared a biological resources report for the proposed change (Appendix A). Wueste Road is situated in Diegan coastal sage scrub, a sensitive natural vegetation community occupied by Federally-listed endangered QCB, Federally listed threatened and MSCP-covered California gnatcatcher, California fully-protected white-tailed kite, CRPR 1B.2 south coast saltscale (*Atriplex pacifica*), CRPR 2B.2 coast barrel cactus (*Ferocactus viridescens*), and several California species of special concern. The proposed change would not result in direct impacts on sensitive natural vegetation or these species utilizing it. Implementation of **MM-BIO-1**, **MM-BIO-2**, **MM-BIO-3**, **MM-BIO-4**, **MM-BIO-5**, and **MM-BIO-6** would ensure that the proposed change would not result in a potentially significant direct or indirect effect on sensitive natural vegetation communities or special-status species. No new

mitigation measures are required for the proposed change. The revised project would not change any of the IS/MND's findings with respect to biological resources. The proposed change would not result in a substantial increase, or new or more significant impacts, on biological resources beyond those considered in the approved project. As with the approved project, significant impacts on biological resources would be avoided or minimized through the mitigation measures detailed in the IS/MND.

There is no new information, such as new regulations, a change of circumstances, or changes to the project, that would give rise to new significant environmental effects or a substantial increase in the severity of previously identified effects. This analysis does not result in any different conclusions than those reached in the IS/MND related to energy, either on a project-related or cumulative basis.

## 3.5 Cultural Resources

### IS/MND Conclusions

As described in the IS/MND, a cultural resources report was prepared in September 2019 based on a file search and field survey conducted for the approved project to determine the presence or potential presence of archaeological resources within the project site. A records search for the project area, including a 1-mile area surrounding the site, was conducted at the South Coastal Information Center on November 13, 2019. Due to the number of archaeological resources recorded in the surrounding area, there is a potential for unidentified, subsurface archaeological resources to be present within the project site (Chambers Group 2019b). If present below the surface, these archaeological resources could be damaged by ground-disturbing activities associated with the project. The IS/MND concluded implementation of mitigation measure **MM-CUL-1** would reduce impacts to a level less than significant.

**MM-CUL-1:** The Applicant will retain a qualified archaeologist and Native American monitor 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 and Native American monitor to ensure satisfactory compliance with applicable regulations (State CEQA Guidelines Section 15064.5(f)).

No previously recorded sites with human remains were identified within the project site. However, due to the number of archaeological resources recorded in the surrounding area, there is a potential for unidentified human remains to be present within the project site. If present, the human remains could be damaged by ground-disturbing activities associated with the project. The IS/MND concluded implementation of mitigation measure **MM-CUL-2** would reduce impacts to less than significant.

**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.

## Revised Project Conclusion

A Phase I Cultural Resources Report was prepared for the revised project, dated August 2021 (Appendix B). An updated records search was provided by the SCIC on March 2, 2021. The record search indicated 39 previously recorded cultural resources are present within a 0.25-mile radius of the project site. On April 9, 2021, ICF archaeologists performed an intensive pedestrian survey of the project site and a 100-foot buffer from proposed project components. Based on the results of the archival research and pedestrian survey, four cultural resources are located within 100 feet of project components, but none are located within the project itself. These resources were not formally evaluated for their California Register of Historical Resources and/or National Register of Historic Properties eligibility as part of the current project, but preliminary significance inferences based on the resource types identified and the precedent used for determining the significance of similar resource types in the survey area vicinity are presented in Table 2 below.

**Table 2. Cultural Resources Impact Summary**

Resource	Description	Inferred Significance	Reasoning	Preliminary Recommendation
P-37-013453/ CA-SDI-13453	Prehistoric artifact scatter	Low	Site has been previously tested and is characterized as a “common” site in the Otay Mesa area with a minimal subsurface deposit. The site has limited potential for additional data	Avoidance and preservation
P-37-015375	Isolated prehistoric flake and fragments of historic-era glass	Low	Isolated resources have limited data potential	No mitigation measure required
P-37-038176	Isolated historic-era trash scatter	Low	Isolated resources have limited data potential	No mitigation measure required
OL-ISO-001	1969 survey marker	Low	Isolated resources have limited data potential	No mitigation measure required

This analysis does not result in any different conclusions than those reached in the IS/MND related to cultural resources. No new mitigation measures are required for the proposed change. Therefore, the revised project would not change any of the IS/MND’s findings with respect to cultural resources impacts. There is no new information, such as new regulations, a change of circumstances, or



changes to the project, that would give rise to new significant environmental effects or a substantial increase in the severity of previously identified effects. This analysis does not result in any different conclusions than those reached in the IS/MND related to cultural resources, either on a project-related or cumulative basis. No new mitigation measures are required for the proposed change.

## **3.6 Energy**

### **IS/MND Conclusions**

The IS/MND identified that construction associated with the approved project would result in a temporary increase in energy consumption due to the energy requirements associated with operating construction equipment. However, due to the temporary and limited nature of construction activities, the IS/MND concluded the approved project would not result in wasteful, inefficient, or unnecessary consumption of energy. The IS/MND also identified that operation of the approved project would result in a campground facility to serve the San Diego and Imperial Council of Boy Scouts of America and other approved local groups and would therefore require the use of energy to transport campers to the project site. A minimal amount of energy would be required to operate approved project features and the campsites, and the approved project does not involve the establishment of any lighting onsite. The IS/MND concluded that operation of the approved project would not result in wasteful, inefficient, or unnecessary consumption of energy.

Because the approved project would comply with both the County's Building Energy Efficiency Standards and the California Green Building Standards Code, the IS/MND concluded the approved project would not conflict with or obstruct any plan associated with energy efficiency, and impacts would be less than significant.

### **Revised Project Conclusion**

The proposed change to the project includes upgrades to existing electrical infrastructure and the installation of an underground sewer alignment within the approved project site that would extend approximately 1.3 miles to the north along Wueste Road within the ROW to connect with an existing City of Chula Vista sewer line. Construction activities would be temporary and limited nature, and operation would not generate energy demand. The proposed changes would not result in a significant energy demand; therefore, the project would not result in a wasteful, inefficient, or unnecessary usage of direct or indirect energy. This analysis does not result in any different conclusions than those reached in the IS/MND related to energy, either on a project-related or cumulative basis. No new mitigation measures are required for the proposed change. Therefore, the revised project would not change any of the IS/MND's findings with respect to energy impacts. There is no new information, such as new regulations, a change of circumstances, or changes to the project, that would give rise to new significant environmental effects or a substantial increase in the severity of previously identified effects. This analysis does not result in any different conclusions than those reached in the IS/MND related to energy, either on a project-related or cumulative basis. No new mitigation measures are required for the proposed change.

## 3.7 Geology and Soils

### IS/MND Conclusions

The approved project site is not located in an active fault zone according to the Alquist–Priolo Earthquake Fault Zoning Map. The nearest active fault zones are located approximately 0.5 mile to the south and approximately 6 miles to the east (County of San Diego 2011). The project site is susceptible to seismicity, but is not susceptible to fault rupture; therefore, impacts involving the rupture of a known earthquake fault were concluded to be less than significant. In addition, although the approved project has the potential to be subjected to ground motion, construction activities were identified to be temporary in nature relative to the frequency of occurrence of significant seismic events. Furthermore, the IS/MND-identified operational facilities would be designed in accordance with the California Building Code and all applicable building codes and standards established by regulatory agencies. Therefore, impacts related to seismic shaking and strong ground-motion hazards were concluded to be less than significant. The IS/MND identified that the southern portion of the project site is potentially prone to liquefaction, but that project features would be strategically placed outside of liquefaction zones. In addition, the project site is not located in a zone with the potential for landslides. The IS/MND determined that the potential susceptibility for slope failure and landslides during construction and operation is less than significant for the approved project. Implementation of appropriate erosion- and sediment-control BMPs that were identified through the preparation of a Storm Water Pollution Prevention Plan (SWPPP) and consistent with the County's *BMP Design Manual for Permanent Site Design* include storm water treatment and hydromodification management, which would be implemented during construction and operation of the approved project to mitigate potential impacts to less-than-significant levels. Impacts associated with the approved project to on- or offsite landslide, lateral spreading, subsidence, liquefaction, or collapse were determined to be less than significant in the IS/MND. Furthermore, the IS/MND identified that the approved project is not located in an area with expansive soils. The IS/MND concluded that impacts were less than significant and that no mitigation measures were necessary.

The approved project analyzed in the IS/MND includes the renovation of a restroom facility, which would connect to the existing park sewer infrastructure. The IS/MND concluded that the approved project would not require the installation of septic tanks or alternative wastewater-disposal systems.

A Phase I Paleontological Resources Report was prepared for the approved project (Chambers Group 2019c). The IS/MND identified that the high paleontological sensitivity of the Friars Formation in San Diego County suggests that there is the potential for construction of the approved project to result in impacts on paleontological resources. Any proposed excavation activities that extend deep enough to encounter previously undisturbed deposits of this geologic unit have the potential to impact the paleontological resources preserved therein. The IS/MND identified that monitoring during excavation is the essential measure to reduce significant impacts on paleontological resources to a level below significance. According to County guidelines, the type of 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 of San Diego 2007). Although the approved project would not require the excavation of more than 2,500 cubic yards, the project site is in an area of high paleontological

sensitivity. Therefore, the IS/MND concluded the approved project would implement **MM-PAL-1** to reduce impacts on paleontological resources to less than significant.

**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 on the discovery of fossils greater than twelve inches in any dimension.

## Revised Project Conclusion

The proposed change to the project includes upgrades to existing electrical infrastructure and the installation of an underground sewer alignment within the approved project site that would extend approximately 1.3 miles to the north along Wueste Road, within the ROW, to connect with an existing City of Chula Vista sewer line. The proposed changes would not result in a substantial increase in ground disturbance that could result in new or more significant impacts on geology and soils, as compared to the approved project. As with the approved project, geology and soils impacts associated with the project change would be avoided with implementation of BMPs related to erosion and stormwater.

The proposed changes are located in the Friars Formation, a high paleontological resource sensitivity geologic unit. The County of San Diego Paleontological Guidelines indicate that projects within High Paleontological Resources potential that propose to excavate equal to or greater than 2,500 cubic yards are required to mitigate potential paleontological impacts by using a project Paleontologist/Monitor during construction. The project change proposes to excavate less than 2,500 cubic yards for the proposed sewer alignment and electrical upgrades. As with the approved project, although the proposed changes would not require the excavation of more than 2,500 cubic yards, the project site is in an area of high paleontological sensitivity. Implementation of **MM-PAL-1** would reduce impacts associated with paleontological resources to a level less than significant.

The proposed change would not result in additional impacts on geology and soils or paleontological resources beyond those identified in the IS/MND. The revised project would not change any of the IS/MND's findings with respect to geology and soils or paleontological impacts. There is no new information, such as new regulations, a change of circumstances, or changes to the project, that would give rise to new significant environmental effects or a substantial increase in the severity of previously identified effects. This analysis does not result in any different conclusions than those reached in the IS/MND related to geology and soils or paleontological resources, either on a project-related or cumulative basis. No new mitigation measures are required for the proposed change.

## 3.8 Greenhouse Gas Emissions

### IS/MND Conclusion

The IS/MND identified that short-term GHG emissions during the construction phase of the approved project would not exceed the annual threshold of 900 metric tons of carbon dioxide equivalent. As such, the approved project would not exceed thresholds or result in violating GHG standards or contribute substantially to an existing or projected GHG violation. The primary source of emissions during operations is mainly the vehicles used by facility staff traveling to and from the project site. The IS/MND concluded emissions during the long-term operations would not be cumulatively considerable, and impacts were less than significant.

The IS/MND concluded that construction-related emissions from the approved would be temporary and finite in nature, below the thresholds being considered, and are consistent with Assembly Bill (AB) 32 and Senate Bill (SB) 32. The approved project's operations-related GHG emissions would be negligible and not comprise a cumulatively considerable contribution to climate change and, therefore, was determined to be less than significant. The IS/MND identified that a Climate Action Plan (CAP) Consistency Review was completed for the project, which detailed how the project would implement all applicable measures identified in the checklist and therefore be consistent with the County's CAP. In addition, the IS/MND identified that the project would be required to meet the most current Title 24, Part 6, Building Energy Efficiency Standards, and the Title 24, Part 10, California Green Building Standards Code, which would further reduce energy usage and corresponding GHG emissions generated by the project. The IS/MND concluded the project would be in compliance with both the County's and State's GHG emissions reduction plans, and, as such, the approved project would not conflict with any applicable plan, policy, or regulation to reduce GHG emissions.

### Revised Project Conclusion

The proposed change to the project includes upgrades to existing electrical infrastructure and the installation of an underground sewer alignment within the approved project site that would extend approximately 1.3 miles to the north along Wueste Road to connect with an existing City of Chula Vista sewer line. Based on a review of similar projects in proximity of the project site, this change would not result in additional impacts on GHG emissions beyond those identified in the IS/MND because construction-related emissions would be temporary and finite in nature. Proposed changes would be required to comply with the same regulations, including AB 32, SB 32, and any future updates to the County's CAP, which is currently in progress. The revised project would not change any of the IS/MND's findings with respect to GHG emissions impacts. There is no new information, such as new regulations, a change of circumstances, or changes to the project, that would give rise to new significant environmental effects or a substantial increase in the severity of previously identified effects. This analysis does not result in any different conclusions than those reached in the IS/MND related to GHG emissions, either on a project-related or cumulative basis. No new mitigation measures are required for the proposed change.

## 3.9 Hazards and Hazardous Materials

### IS/MND Conclusions

The IS/MND identified that construction and operation of the approved project would necessitate the routine transport of potentially hazardous commercial materials, including, but not limited to, gasoline, oil, solvents, cleaners, and paint. However, any potentially hazardous materials used or found onsite would be handled in accordance with state and federal regulations regarding the transport, use, and storage of hazardous materials. Furthermore, the IS/MND identified that all construction and operational activities would be required to adhere to local standards set forth by the County, as well as state and federal health and safety requirements that are intended to minimize risk to the public from hazardous materials, such as California Division of Occupational Safety and Health requirements, the Hazardous Waste Control Act, the California Accidental Release Prevention Program, and the California Health and Safety Code. As a result, the IS/MND concluded the approved project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials or result in a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials, and impacts would be less than significant.

The IS/MND identified that the closest school is 1.5 miles to the northwest and that hazardous materials would be handled in compliance with local regulations and standards set forth by the District, City, state, and federal government. Therefore, the IS/MND concluded the approved project would not have the potential to emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school, and no impact would occur.

Based on a regulatory database search, the IS/MND identified that the project site is not located within an identified hazardous material site pursuant to Government Code Section 65962.5 (DTSC 2019; SWRCB 2019). A hazardous material cleanup site was previously located approximately 0.2 mile away from the approved project site. The case summary disclosed that in 2004 there was a leaking underground storage tank cleanup site involving a gasoline tank. However, the tank was removed, and the case was closed in 2006 (SWRCB 2019). Therefore, the IS/MND concluded that because the project site is not listed as an open cleanup site or hazardous waste facility, no impact would occur.

The project site is located approximately 3.5 miles northeast of Brown Field Municipal Airport and 17 miles southeast of San Diego International Airport. As such, the project site is not within the Airport Influence Area for the Brown Field Municipal Airport nor the San Diego International Airport, and the IS/MND concluded no impact would occur.

Due to the project site's proximity to the Savage Dam (approximately 0.25 mile northeast), the southern portion of the project site is located within the dam inundation zone. The IS/MND identified that the project features would be strategically placed outside the inundation extent and would not have a significant impact to emergency response plans when evaluated under County significance guidelines. Additionally, the IS/MND identified construction and operational activities of the approved 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.

In the case of a special event with up to 400 attendees, the IS/MND concluded that implementation of **MM-HAZ-1**—which would require the preparation of an Emergency Action and Fire Prevention Plan detailing how council staff, volunteers, and members should respond during a crisis at the special event—would reduce impacts on an adopted emergency response plan or emergency evacuation plan to a level below significant.

The project site is located within an identified Very High Fire Hazard Severity Zone and the approved project, which includes the implementation of a fire ring, would result in an increased number of visitors to the project site. The IS/MND identified that the approved project would align with the goals of the County General Plan's Safety Element, including Goals S-3, S-4, and S-6, which focus on minimizing fire hazards, managing fuel loads, and ensuring adequate fire and medical services. Additionally, the approved project would comply with the regulations in the County Consolidated Fire Code and the Community Wildfire Protection Plan for Southwest San Diego County. Furthermore, the IS/MND identified that under the policies of the BSA and with implementation of **MM-HAZ-1**, the local council would be required to prepare an Emergency Action and Fire Prevention Plan for the day camp and each special event held at the project site; the plans will require evacuation preparation, safety training, and a ban on fire ring use on Red Flag warning days. Therefore, the IS/MND concluded the approved project would not increase the risk of wildfire at the project site and impacts would be less than significant.

**MM-HAZ-1:** In preparation for Day Camp 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 Occupational Safety and Health Administration standards 29 CFR 1910.38 and 29 CFR 1910.39. An Occupational Safety and Health Administration-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, 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), and responsible party for maintaining the EAP/FPP. Additionally, the FPP will require that the fire ring not be used on Red Flag warning days.

## Revised Project Conclusion

The proposed change involves upgrades to existing electrical infrastructure and the installation of an approximate 1.3-mile-long underground sewer alignment starting within the project site that would extend approximately 1.3 miles to the north along Wueste Road, within the ROW, until it connects with an existing City of Chula Vista sewer line adjacent to the southern end of the Chula Vista Elite Athlete Training Center. Construction activities would necessitate the routine transport of potentially hazardous commercial materials, including, but not limited to, gasoline, oil, solvents, cleaners, and paint. However, any potentially hazardous materials used or found onsite would be handled in accordance with state and federal regulations regarding the transport, use, and storage of hazardous materials.

The closest school would be approximately 1.1 miles northwest of the revised project site. As such, the revised project would not result in an impact to a school within one-quarter mile and would not change the IS/MNDs findings as relates to schools.

The revised project would be approximately 120 feet northeast of the hazardous material clean-up site that was identified in the vicinity of the project site. Due to the status of the case (i.e., closed), and the distance to the revised project site, the revised project would not be included in a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and would not create a significant hazard to the public or the environment. As such the revised project would not change the conclusions made in the IS/MND related to being located on a hazardous materials site.

The revised project would not change any other findings of the IS/MND with respect to hazards and hazardous materials impacts because construction activities would not result in any new or more severe impacts, and operations would not change as a result of the revised project. There is no new information, such as new regulations, a change of circumstances, or changes to the project, that would give rise to new significant environmental effects or a substantial increase in the severity of previously identified effects. This analysis does not result in any different conclusions than those reached in the IS/MND related to hazards and hazardous materials, either on a project-related or cumulative basis. No new mitigation measures are required for the proposed change.

## **3.10 Hydrology and Water Quality**

### **IS/MND Conclusions**

As described in the IS/MND, the approved project would disturb over 1 acre of land and would be required to obtain a National Pollution Discharge Elimination System General Construction Permit. Compliance with the General Construction Permit would require the preparation of an SWPPP for the project site and would identify potential pollutants and outline the BMPs that would be implemented during construction activities to prevent those pollutants from entering nearby water bodies. The approved project would be covered under the County's existing regional Waste Discharge Requirement Permit. The stormwater runoff would be consistent with the County of San Diego Jurisdictional Runoff Management Plan (JRMP) and the BMP Design Manual. The approved project's conformance to the waste discharge requirements ensures the project would not create cumulatively considerable water quality impacts related to waste discharge because, through the permit, the project would conform to countywide watershed standards in the JRMP and BMP Design Manual.

### **Revised Project Conclusion**

The proposed change to the project includes upgrades to existing electrical infrastructure and the installation of an underground sewer alignment within the approved project site that would extend approximately 1.3 miles to the north along Wueste Road (within the ROW) to connect with an existing City of Chula Vista sewer line. This change would not introduce any additional impacts related to hydrology and water quality because construction of the sewer line would comply with the BMPs and requirements outlined in the SWPPP prepared for the approved project and the JRMP and the BMP Design Manual. In addition, operation of the sewer line would not result in any changes to operation of the proposed project. Therefore, the revised project would not result in any impacts beyond those identified in the IS/MND. There is no new information, such as new regulations, a change of circumstances, or changes to the project, that would give rise to new significant environmental effects or a substantial increase in the severity of previously identified effects. This analysis does not result in any different conclusions than those reached in the IS/MND related to

hydrology and water quality, either on a project-related or cumulative basis. No new mitigation measures are required for the proposed change.

## 3.11 Land Use and Planning

### IS/MND Conclusions

As described in the IS/MND, the approved project is located in an area that has been characterized by agricultural uses for several decades and has been in transition to residential uses or vacant land and would be consistent with the surrounding area. The approved project would not divide an established community, nor conflict with the goals and policies of the County General Plan. Finally, the approved project would be consistent with the existing zoning. No mitigation measures specific to Land Use were identified in the IS/MND.

The IS/MND concluded the project would maintain consistency with the goals and policies of the County General Plan's Land Use Element and Zoning Ordinance. Specifically, the IS/MND identified that in accordance with Goal LU-2 of the Land Use Element, the project would maintain the County's rural character through conservation and enhancement of the rural setting at the project site. The project would also align with Goal LU-6 of the Land Use Element by creating a built environment in balance with the natural environment. Moreover, the IS/MND identified activities at the project site would be substantially similar to activities onsite currently and would therefore not conflict with an applicable land use criterion.

### Revised Project Conclusion

The proposed change involves upgrades to existing electrical infrastructure and the installation of a new sewer line from the approved project site to an existing City of Chula Vista sewer line. The alignment would begin within the Otay Lakes County Park located within the City of Chula Vista on County-owned property. The property is zoned as Open Space (S80) and Limited Agriculture (A70) and identified as Open Space land use designation by the *County of San Diego General Plan*. The proposed sewer line would traverse north along Wueste Road, which is within the City of Chula Vista and serves as part of the boundary for area to the west zoned as Planned Community (City of Chula Vista 2021). The proposed sewer would be entirely within ROW within Wueste Road and adjacent to the private road within the Chula Vista Elite Athlete Training Center.

The revised project would not introduce any changes that would divide an established community because the proposed sewer line and electrical infrastructure upgrades would be entirely within existing roadways or the Otay Lakes County Park. The revised project would also not conflict with any land use plan, policy, or regulation because it would not change any existing land use designations or zoning and would not substantially change the construction or operational activities of the approved project. Therefore, the revised project would not result in any impacts beyond what was identified in the IS/MND related to land use and planning. There is no new information, such as new regulations, a change of circumstances, or changes to the project, that would give rise to new significant environmental effects or a substantial increase in the severity of previously identified effects. This analysis does not result in any different conclusions than those reached in the IS/MND related to land use and planning, either on a project-related or cumulative basis. No new mitigation measures are required for the proposed change.



## 3.12 Mineral Resources

### IS/MND Conclusions

The IS/MND identified two Regionally Significant MRZ-2 Aggregate Resource Areas approximately 0.5 mile south and 3 miles northeast of the project site. The IS/MND identified that current land use precludes mineral extraction at the project site, and land use would not change as a result of the project. Implementation of the approved project would not result in the loss of availability of a known mineral resource that would be of value because mineral resources have not been previously found or developed on the project site. Therefore, the IS/MND concluded that no impact on any mineral resources would occur.

### Revised Project Conclusion

The proposed change involves upgrades to existing electrical infrastructure and installing a sewer line from the approved project site at Otay Lakes County Park that would extend approximately 1.3 miles to the north along the ROW of Wueste Road. The proposed sewer alignment is not identified as an area of known mineral resources, and this revised project would not change any of the IS/MND's findings with respect to mineral resources impacts. There is no new information, such as new regulations, a change of circumstances, or changes to the project, that would give rise to new significant environmental effects or a substantial increase in the severity of previously identified effects. This analysis does not result in any different conclusions than those reached in the IS/MND related to mineral resources, either on a project-related or cumulative basis. No new mitigation measures are required for the proposed change.

## 3.13 Noise

### IS/MND Conclusions

The IS/MND stated that the approved project would not expose people to potentially significant noise levels that exceed the allowable limits of the General Plan, Noise Ordinance, and other applicable standards. The approved project would not generate construction noise that would exceed the standards and would only occur during permitted hours of operation. The project's conformance to the County standards ensures the approved project would not create cumulatively considerable noise impacts because the project would not exceed the local noise standards for noise-sensitive areas. Although the approved project would introduce new noise sources, such as the amphitheater and new camp sites, the closest residences are approximately 1.5 miles away and were not anticipated to be affected by any of the proposed noise sources. Therefore, the IS/MND concluded the approved project would not generate substantial temporary or permanent increases in ambient noise levels or in excess of standards established in the General Plan, Noise Ordinance, or other applicable standards that may have a potentially significant impact on the environment, and impacts would be less than significant.

Construction and operation of the approved project would not result in the generation of excessive groundborne vibrations or groundborne noise levels, and impacts were concluded to be less than significant.

## Revised Project Conclusion

The proposed change involves improvements to existing electrical infrastructure and the installation of a new sewer line from the approved project site to the north along Wueste Road to connect to an existing City of Chula Vista sewer line. Some construction noise and vibration would be associated with installation of the proposed sewer alignment; however, noise generated from these activities would not be greater than what was described in the IS/MND for the approved project. As with the approved project, construction activities would comply with the Noise Ordinance and would only occur during permitted hours of operation. Furthermore, the closest sensitive receptors are located approximately 0.62 mile north. As such, the proposed change would not result in additional impacts on noise beyond those identified in the IS/MND, and the revised project would not change any of the IS/MND's findings with respect to noise impacts.

Operation of the revised project would not introduce any new sources of noise or vibration during operation. Therefore, the proposed change would not result in additional impacts on noise beyond those identified in the IS/MND, and the revised project would not change any of the IS/MND's findings with respect to noise impacts. There is no new information, such as new regulations, a change of circumstances, or changes to the project, that would give rise to new significant environmental effects or a substantial increase in the severity of previously identified effects. This analysis does not result in any different conclusions than those reached in the IS/MND related to noise, either on a project-related or cumulative basis. No new mitigation measures are required for the proposed change.

## 3.14 Population and Housing

### IS/MND Conclusions

The approved project would not create any direct or indirect population growth because the project does not propose any physical or regulatory change that would remove a restriction to or encourage population growth. Therefore, the project would have no impact on population and housing growth either directly or indirectly. The approved project would provide additional recreational facilities in order to accommodate the existing and planned population. Finally, the approved project would not displace any existing housing because the site is used for open space and recreational purposes. No existing housing is located on the project site.

### Revised Project Conclusion

The proposed change would not result in additional impacts on population and housing beyond those identified in the IS/MND because the proposed change would not induce population growth or result in new homes. The proposed change would extend infrastructure (the sewer and electrical lines), but it would only serve the approved project site in order to switch the approved project site from a septic system to a sewer system; it would not provide sewage disposal services to any other areas. Additionally, the proposed change would not displace any people or housing because all of it would occur within existing public ROW. Therefore, the revised project would not change any of the IS/MND's findings with respect to population and housing impacts. There is no new information, such as new regulations, a change of circumstances, or changes to the project, that would give rise to new significant environmental effects or a substantial increase in the severity of previously identified effects. This analysis does not result in any different conclusions than those reached in the

IS/MND related to population and housing, either on a project-related or cumulative basis. No new mitigation measures are required for the proposed change.

## **3.15 Public Services**

### **IS/MND Conclusions**

The approved project would be used as a campground and recreational facility, and its construction is not necessary to maintain acceptable service ratios, response times, or other performance service ratios or objectives for any public services. The approved project would not have an adverse physical effect on the environment because it does not require new or significantly altered services or facilities to be constructed. Impacts were concluded to be less than significant.

### **Revised Project Conclusion**

The proposed change involves upgrades to existing electrical infrastructure and the installation of a sewer line from the approved project site to the north along Wueste Road to connect with an existing City of Chula Vista sewer line. This project would not result in additional impacts on public services beyond those identified in the IS/MND because it would not result in any construction or operational changes that would increase the demand on fire, police, or other public services. The revised project would not change any of the IS/MND's findings with respect to public services impacts. There is no new information, such as new regulations, a change of circumstances, or changes to the project, that would give rise to new significant environmental effects or a substantial increase in the severity of previously identified effects. This analysis does not result in any different conclusions than those reached in the IS/MND related to public services, either on a project-related or cumulative basis. No new mitigation measures are required for the proposed change.

## **3.16 Recreation**

### **IS/MND Conclusions**

The IS/MND for the approved project states that the project would increase the number of visitors to the project site, which is designated as Open Space. To counteract the potential for physical deterioration from increased use of the facility, the approved project was designed to avoid special status species, and the use of proposed camp facilities would include public outreach and education on the surrounding natural habitat. Furthermore, campers using the approved project site would be managed and scheduled by the BSA to prevent misuse of the site and its facilities. Additionally, the approved project would expand recreational facilities and may include a COPE course, zip-line, amphitheater, and archery range, which could serve as a recreational amenity, and might result in a decreased use of existing neighborhood or regional parks. As such, the IS/MND concluded that the project would not 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, and impacts were concluded to be less than significant.

As described throughout the IS/MND, construction and improvement of recreational facilities within the project site would not result in any potentially significant impacts with implementation of

mitigation measures **MM-AQ-1**, **MM-AQ-2**, **MM-BIO-1** through **MM-BIO-8**, **MM-CUL-1**, **MM-CUL-2**, **MM-HAZ-1**, **MM-PAL-1**, **MM-TRA-1**, and **MM-TRC-1**. The approved 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. Therefore, impacts were concluded to be less than significant with mitigation incorporated.

## Revised Project Conclusion

The proposed change involves upgrades to existing electrical infrastructure and the installation of an underground sewer alignment within the approved project site that would extend approximately 1.3 miles to the north along Wueste Road. The proposed change would not result in additional impacts on recreation beyond those identified in the IS/MND. The revised project would not change any of the IS/MND's findings with respect to recreation impacts. Security lighting associated with upgrades to existing electrical infrastructure and new infrastructure would make recreation opportunities more safe. There is no new information, such as new regulations, a change of circumstances, or changes to the project, that would give rise to new significant environmental effects or a substantial increase in the severity of previously identified effects. This analysis does not result in any different conclusions than those reached in the IS/MND related to recreation, either on a project-related or cumulative basis. No new mitigation measures are required for the proposed change.

## 3.17 Transportation

### IS/MND Conclusions

A Transportation Scoping Memorandum and a Parking and On-Site Circulation Review was prepared by LLG to identify vehicular impacts associated with the approved project. The IS/MND identified that construction vehicles would use the existing roadways that surround the project site to deliver materials and haul waste. The main access road into the approved project site is Wueste Road to the north, which connects to Olympic Parkway and Interstate 805 through Chula Vista. Wueste Road is a two-way street in a rural area, with one lane in each direction, that serves as the only paved entry into Otay Lakes County Park. Roadway users could experience temporary delays from material deliveries, but the IS/MND concluded these delays would be both brief and infrequent. Therefore, they would not affect overall traffic circulation in the vicinity of the project site. In addition, the IS/MND stated that construction activities would not impede non-motorized travel or public transportation in the immediate vicinity of the approved project site because all construction would occur within the existing park boundary.

During operations, the IS/MND identified parking demand would be estimated at 40 spaces for special events (i.e., 400 attendees and staff, 4–6 times annually) and 27 spaces for overnight camping, which occurs year-round on weekends (Fridays–Sundays). The IS/MND concluded implementation of **MM-TRA-1** would ensure that there is sufficient parking for special events and overnight camping.

**MM-TRA-1:** Given the potential variability of the parking demand by event, the project would develop and maintain a Parking Management Plan that 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 offsite parking with a shuttle if necessary for the largest events.

The approved project would not conflict with applicable plans, ordinances, or policies for the project which include San Diego Forward: The Regional Plan (SANDAG 2015), the County General Plan's Mobility and Safety Elements, the City of San Diego's Traffic Impact Study Manual (1998), and the City of San Diego's Street Design Manual (2017). Land use would remain the same, and no changes to the existing circulation system are proposed; thus, the IS/MND concluded that the approved project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b). Finally, the approved 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. As such, no impacts associated with an increase in hazards due to a geometric design feature or incompatible use were identified.

## Revised Project Conclusion

As with the approved project, the revised project would result in no permanent changes that would affect transportation. The proposed change involves upgrades to existing infrastructure and the installation of an underground sewer alignment within the approved project site that would extend below or adjacent to Wueste Road. During construction of the proposed sewer line, temporary one lane closures of Wueste Road may be necessary. Additionally, construction may temporarily block the entrance for the boat launch area of the Lower Otay Lake Reservoir, which is accessed from Wueste Road. As discussed in the approved IS/MND, any temporary traffic control during construction would meet the requirements of the California Manual on Uniform Traffic Control Devices (Caltrans 2014). As these disruptions would be temporary and intermittent, impacts would be less than significant. Additionally, emergency access would be maintained at all times. The revised project would not change any of the IS/MND's findings with respect to transportation impacts. There is no new information, such as new regulations, a change of circumstances, or changes to the project, that would give rise to new significant environmental effects or a substantial increase in the severity of previously identified effects. This analysis does not result in any different conclusions than those reached in the IS/MND related to transportation, either on a project-related or cumulative basis. No new mitigation measures are required for the proposed change.

## 3.18 Tribal Cultural Resources

### IS/MND Conclusions

Pursuant to AB 52, consultation was initiated with culturally affiliated tribes. Iipay Nation of Santa Ysabel, Jamul Indian Village, and Viejas Band of Kumeyaay Indians indicated that the project area has cultural significance to their tribes. **MM-TCR-1** would reduce impacts to less than significant.

**MM-TCR-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.

## Revised Project Conclusion

The proposed change involves upgrades to existing electrical infrastructure and the installation of an underground sewer alignment within the approved project site that would extend approximately 1.3 miles to the north along Wueste Road to connect with an existing City of Chula Vista sewer line. The sewer alignment is an underground utility improvement primarily located below or adjacent to Wueste Road and on disturbed land. **MM-TCR-1** would require a qualified local Kumeyaay monitor for all ground-disturbing activities, including the new sewer alignment construction. Therefore, the proposed change would not result in additional impacts on tribal cultural resources beyond those identified in the IS/MND. The revised project would not change any of the IS/MND's findings with respect to tribal cultural resources impacts. There is no new information, such as new regulations, a change of circumstances, or changes to the project, that would give rise to new significant environmental effects or a substantial increase in the severity of previously identified effects. This analysis does not result in any different conclusions than those reached in the IS/MND related to tribal cultural resources, either on a project-related or cumulative basis. No new mitigation measures are required for the proposed change.

## 3.19 Utilities and Service Systems

### IS/MND Conclusions

The IS/MND for the approved project included a discussion of temporary and operational utilities and service-system impacts. The IS/MND identified that the main use of water would be associated with the renovated restroom facility, which would be connected to the existing Otay Lakes County Park water and sewer infrastructure. The IS/MND discussed an agreement between the County and the City of Chula Vista to tie into the municipal sewer system south of the approved project. As identified in the IS/MND, the City of Chula Vista does not currently operate a wastewater treatment plant, and therefore the wastewater flows are sent to the San Diego Metropolitan Joint Powers Authority (JPA) treatment facilities. The JPA wastewater treatment system capacity was concluded to be sufficient to meet the projected needs of the service area. Water at the project site would be provided by the City of San Diego PUD's Water Supply, which is also projected to have available water resources in the foreseeable future and continues to diversify its water sources (City of San Diego 2018). Portable toilets would be used in the southern portion of the project site, near the Camporee Field, to accommodate wastewater needs outside of the main camping area near the existing restroom. These portable toilets would also reduce significant water use during special events at the project site. The IS/MND identified compliance with the SWPPP would involve incorporation of temporary stormwater drainage BMPs during construction activities, but construction or relocation of permanent stormwater drainage facilities is not expected. Additionally, the approved project does not involve the establishment of any lighting onsite, except for safety lighting for the restroom, which would be solar-powered and does not require natural gas or telecommunications facilities. Therefore, impacts were concluded to be less than significant.

Solid waste generated during construction and operation activities would not be in excess of capacity of the Otay Landfill, which would serve the approved project. The IS/MND also concluded the approved project would comply with applicable federal, State, and local regulations related to solid waste and would align with the goals of the County of San Diego Strategic Plan to Reduce Waste. Therefore, impacts were concluded to be less than significant.

## Revised Project Conclusion

The proposed change involves upgrades to existing electrical infrastructure and the installation of an underground sewer alignment within the approved project site that would extend approximately 1.3 miles to the north along Wueste Road to connect with an existing City of Chula Vista sewer line. The IS/MND discussed connecting to the municipal sewer system south of the approved project in the City of Chula Vista. Though the proposed sewer line would now connect north of the approved project site, it would still be connected to the JPA wastewater treatment system within the City of Chula Vista. The impacts of the proposed sewer alignment have been evaluated throughout this addendum, and the sewer line would not cause significant environmental effects. The upgrades to the electrical infrastructure would be primarily minor replacements or upgrades to existing elements and would not cause significant environmental effects. The proposed changes would not result in additional impacts on utilities and service systems beyond those identified in the IS/MND. The revised project would not change any of the IS/MND's findings with respect to utilities and service systems impacts. There is no new information, such as new regulations, a change of circumstances, or changes to the project, that would give rise to new significant environmental effects or a substantial increase in the severity of previously identified effects. This analysis does not result in any different conclusions than those reached in the IS/MND related to utilities and service systems, either on a project-related or cumulative basis. No new mitigation measures are required for the proposed change.

## 3.20 Wildfire

### IS/MND Conclusions

The approved project is located within a Very High Fire Hazard Severity Zone and would not impact an emergency response or evacuation plan according to the County's Guidelines for Determining Significance for Emergency Response Plans. Additionally, the approved 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. However, an Emergency Action and Fire Prevention Plan would be prepared and campfires would not be allowed on Red Flag days (**MM-HAZ-1**).

Except for the fire ring, the approved project does not include any features that involve the installation or maintenance of associated wildfire infrastructure (e.g., road, fuel breaks, emergency water sources, other utilities) that may exacerbate a fire risk. The IS/MND identified that the approved project would align with 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. Furthermore, the BSA incorporates 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. Therefore, the IS/MND concluded wildfire risks were less than significant.

The IS/MND identified that the project area is generally susceptible to landslides. The southern border of the project site has moderate to high soil slip risk, but project features were strategically constructed in the northern portion of the site to avoid those areas. Therefore, the IS/MND

concluded that the approved project would not expose people or structures to significant risks related to downslope or downstream flooding or landslides, as a result of runoff, postfire slope instability, or drainage changes, and impacts would be less than significant.

## Revised Project Conclusion

The proposed change involves upgrades to existing electrical infrastructure and the installation of an underground sewer alignment within the approved project site that would extend approximately 1.3 miles to the north along Wueste Road, within the ROW to connect with an existing City of Chula Vista sewer line. The proposed change would not impair or interfere with the Operational Area Emergency Plan or the Multi-Jurisdictional Hazard Mitigation Plan because it would not prohibit subsequent plans from being established or prevent the goals and objectives of the existing plan from being carried out. Emergency access would be maintained at all times along Wueste Road. The new sewer line would not 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. The revised project would not change any of the IS/MND's findings with respect to wildfire impacts. There is no new information, such as new regulations, a change of circumstances, or changes to the project, that would give rise to new significant environmental effects or a substantial increase in the severity of previously identified effects. This analysis does not result in any different conclusions than those reached in the IS/MND related to wildfire, either on a project-related or cumulative basis. No new mitigation measures are required for the proposed change.



## Chapter 4

# Conclusions

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The purpose of this Addendum was to address and analyze the environmental effects associated with the change to the approved project that occurred since the adoption of the IS/MND. Based on the foregoing analysis, it is concluded that the analysis conducted, and the conclusions reached in the IS/MND adopted June 24, 2020, remain valid. The proposed change to the project would not cause new significant impacts not identified in the IS/MND, and no new mitigation measures would be necessary to reduce said environmental impacts.

Therefore, no further environmental documentation or review beyond this Addendum is required.

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Appendix A

**Addendum to the Otay Lakes Campground Project  
Biological Resources Report**

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Appendix B

**Addendum to the Otay Lakes Campground Project  
Phase I Cultural Resources Report**

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