



County of San Diego

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June 17, 2020

DRAFT
CEQA Initial Study - Environmental Checklist Form
(Based on the State CEQA Guidelines, Appendix G)

1. Project Title:

County of San Diego Sanitation District: Los Coches Sanitary Sewer Improvements from Maintenance Hole LSMH0555 to LSMH0599 Project

2. Lead agency name and address:

County of San Diego, Department of Public Works
5510 Overland Avenue, Suite 410
San Diego, CA 92123-1239

- a. Contact: Cynthia Curtis, Planning Manager
- b. Phone number: (858) 694-3906
- c. E-mail: Cynthia.Curtis@sdcounty.ca.gov

3. Project location:

The proposed project is located within a 7,300-foot section of an existing sanitary sewer collection line situated just south of Old Hwy 80 between its intersections with Gaucho Lane to the west and Flinn Crest Street to the east.

4. Project Applicant name and address:

County of San Diego Sanitation District
5500 Overland Avenue, Suite 315
San Diego, CA 92123-1239

5. Description of project:

The County of San Diego Sanitation District proposes the Los Coches Sanitary Sewer Improvements from Maintenance Hole LSMH0555 to LSMH0599 Project (proposed project) to rehabilitate a section of an existing sanitary sewer pipeline in a commercial/residential area of the unincorporated community of Lakeside. The proposed project follows the alignment of a sewer line, which is situated just south of Old Hwy 80 between its intersections with Gaucho Lane to the west and Flinn Crest Street to the east. It generally follows Los Coches Creek (Creek), crossing through the creek bed in multiple locations.

The proposed project will rehabilitate approximately 7,300 feet of an existing sewer collection system pipeline located between maintenance holes LSMH0555 to LSMH0599 (subject reach). The pipeline serves as a local collector for sewer services south of the Creek and as a bypass for the newer collector pipeline within Old Highway 80.

Based on an evaluation of pipeline surveying data, the proposed work includes two main elements: installation of a composite lining within the existing pipe using the Cured-in-Place Pipe (CIPP) method. The installation of CIPP is trenchless and only requires insertion at existing maintenance holes with very little ground disturbance. The CIPP liner serves to reinforce the existing pipe by precluding decay and providing additional structure.

Also, in three minor sections of the subject reach, the exterior of deteriorating pipe requires reinforcement through concrete encasement and a cover of Articulated Concrete Block (ACB) to strengthen the cover and stability of streambed surfaces above the pipe section. Sectional concrete encasement is warranted where the sections of the pipeline have less than the recommended soil cover above the pipe. To perform pipe replacement and concrete encasement in these areas, a mini-backhoe and a small skid loader will be used to excavate between 3 to 5 feet in diameter of native soil around the existing sewer main located in these three sections. Upon completion of the pipe section's concrete encasement, excavated areas will be backfilled with native soil, aligned with ACB and the area would be restored using a native species hydroseed.

These repairs and improvements would protect and stabilize the long-term safety and reliability of the sewer pipeline to reduce the likelihood of future sewage spills and damage caused by pipe material degradation and erosion. Construction on the sewer pipeline and maintenance holes will occur within an existing sewer easement. Temporary construction access to the sewer facilities will be coordinated with surrounding property owners, and temporarily disturbed areas will be restored. To help avoid impacts to sensitive vegetation communities outside of the project footprint during construction, temporary environmental fencing would be installed prior to construction activities. Construction duration is approximately 180 days, and temporary traffic control measures will be in place during that time as needed for mobilization of equipment and safety of the workers.

6. Surrounding land uses and setting:

The proposed project is surrounded by semi-rural development, including residential and commercial areas, and a large segment of open space. Portions of the cities of El Cajon and Lakeside surround the proposed project site. Land uses include commercial, residential, Flinn Springs County Park, and open space.

There is one school located less than one mile from the project site. It is Rios Elementary School of the Cajon Valley Union School District, which is located to the south of the project site. The nearest medical facility is Kaiser Permanente Bostonia Medical Offices, which is located approximately 4.1 miles west of the project site at 1630 East Main Street in the City of El Cajon.

7. Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement):

Permit Type/Action	Agency
401 Permit – Water Quality Certification	Regional Water Quality Control Board (RWQCB)
404 Permit – Dredge and Fill	US Army Corps of Engineers (USACE)
1602 Permit- Fish & Game Code	California Department of Fish & Wildlife (CDFW)

8. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code §21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?

YES

NO

Note: Conducting consultation early in the CEQA process allows tribal governments, public lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and to reduce the potential for delay and conflict in the environmental review process (see Public Resources Code §21080.3.2). Information is also available from the Native American Heritage Commission’s Sacred Lands File per Public Resources Code §5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code §21082.3(e) contains provisions specific to confidentiality.

AB-52 consultation with registered tribes was initiated between the County and each tribal contact on May 25, 2020 and the consultation request period ends June 25, 2020. These tribes included: Barona Band of Mission Indians, Campo Band of Mission Indians, Lipay Nation of Santa Ysabel, Jamul Indian Village, Kwaaymii Laguna Band of Mission Indians, Manzanita Band of Kumeyaay Indians, San Pasqual Band of Mission Indians, Sycuan Band of the Kumeyaay Nation, and Viejas Band of Kumeyaay Indians. The site was surveyed by a Native American monitor from the Jamul Indian Village tribe on May 7, 2020.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED: The environmental factors checked below would be potentially affected by this project and involve at least one impact that is a “Potentially Significant Impact” or a “Less Than Significant With Mitigation Incorporated,” as indicated by the checklist on the following pages.

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

DETERMINATION: (To be completed by the Lead Agency)

On the basis of this initial evaluation:

- On the basis of this Initial Study, County of San Diego Sanitation District finds that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- On the basis of this Initial Study, County of San Diego Sanitation District finds that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- On the basis of this Initial Study, County of San Diego Sanitation District finds that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- On the basis of this Initial Study, County of San Diego Sanitation District finds that the proposed project MAY have a “potentially significant impact” or “potentially significant unless mitigated” impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

- On the basis of this Initial Study, County of San Diego Sanitation District finds that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.



Signature

Cynthia Curtis
Printed Name

Date June 16, 2020

Environmental Planning Manager
Title

INSTRUCTIONS ON EVALUATION OF ENVIRONMENTAL IMPACTS

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

I. AESTHETICS

Except as provided in Public Resources Code Section 21099, would the project:

a) Have a substantial adverse effect on a scenic vista?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

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

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

No Impact: Scenic vistas are singular vantage points that offer unobstructed views of valued viewsheds, including areas designated as official scenic vistas along major highways or County designated visual resources. Based on the site visits by County staff on April 17, 2019 and September 4, 2019, the proposed project is not located near or within, or visible from, a scenic vista and would not substantially alter the composition of an existing scenic vista in a way that would adversely alter the visual quality or character of the view. The project site is located in a commercial and residential area, with the closest land uses being single-home residences and commercial businesses. The goal of the project is to rehabilitate a section of an existing sanitary sewer pipeline. This would protect and stabilize the long-term safety and reliability of the sewer pipeline, to reduce the likelihood of future sewage spills and damage caused by pipe erosion. The ACB would be placed over the sewer line within the streambed. Any areas temporarily disturbed during the construction would be restored through recompacting and revegetation. Therefore, the improvements would not be visible from or substantially change the composition of an existing scenic vista or adversely alter the visual quality or character of the view. Therefore, the proposed project would not have an adverse effect on a scenic vista.

b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

State scenic highways refer to those highways that are officially designated by the California Department of Transportation (Caltrans) as scenic ([Caltrans-California Scenic Highway Program](#)). Generally, the area defined within a state scenic highway is the land adjacent to and visible from the vehicular right-of-way. The dimension of a scenic highway is usually identified using a motorist's line of vision, but a reasonable boundary is selected when the view extends to the distant horizon. The scenic highway corridor extends to the visual limits of the landscape abutting the scenic highway.

No Impact: The proposed project is not located near or visible within the composite viewshed of a State scenic highway and would not damage or remove scenic resources, including, but not limited to trees, rock outcroppings, and historic buildings within a State scenic highway. Therefore, the proposed project would not have any substantial adverse effect on a scenic resource within a State scenic highway.

c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage points). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

Visual character is the objective composition of the visible landscape within a viewshed. Visual character is based on the organization of the pattern elements line, form, color, and texture. Visual character is commonly discussed in terms of dominance, scale, diversity and continuity. Visual quality is the viewer's perception of the visual environment and varies based on exposure, sensitivity and expectation of the viewers. The existing visual character and quality surrounding the proposed project area can be characterized as consisting of residential and commercial development.

No Impact: The proposed project does not propose discernable changes to the visual environment. The project site is located in a commercial and residential area, with the closest land uses being single-home residences and commercial businesses. The project proposes to rehabilitate a section of an existing sanitary sewer pipeline. This would protect and stabilize the long-term safety and reliability of the sewer pipeline, to reduce the likelihood of future sewage spills and damage caused by pipe erosion. The ACB would be placed over the existing sewer line within the streambed. Any areas temporarily disturbed during construction would be restored through recompacting and revegetation. Given the unobtrusive location of ACB, the existing visual character or quality of public views of the site and its surroundings would not be degraded.

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

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
|---|---|

- Less Than Significant With Mitigation Incorporated No Impact

Discussion/Explanation:

No Impact: The proposed project would not introduce new lighting sources or change the existing lighting at the Creek. The project does not propose any use of outdoor lighting or building materials with highly reflective properties, such as highly reflective glass or high-gloss surface colors. Based on this, the project would not create any new sources of light pollution that could contribute to skyglow, light trespass or glare and adversely affect day or nighttime views in area.

II. AGRICULTURE AND FORESTRY RESOURCES

Would the project:

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

- Potentially Significant Impact Less than Significant Impact
 Less Than Significant With Mitigation Incorporated No Impact

Discussion/Explanation:

No Impact: The project site contains agricultural resources, such as lands designated as Prime Farmland and Farmland of Local Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency. The project site does not contain lands designated as Unique Farmland or Farmland of Statewide Importance. However, while the proposed project site is located on Prime Farmland and Farmland of Local Importance, the proposed project is located entirely within an existing sewer easement and would not change the existing land use. Additionally, the project site does not contain lands designated as Unique Farmland or Farmland of Statewide Importance, and, therefore, no agricultural resources would be converted to a non-agricultural use.

- b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?

- Potentially Significant Impact Less than Significant Impact
 Less Than Significant With Mitigation Incorporated No Impact

Discussion/Explanation:

No Impact: The project site is zoned commercial/residential, which is not considered to be an agricultural zone. Additionally, the project site's land is not under a Williamson Act Contract. Therefore, the project does not conflict with existing zoning for agricultural use, or a Williamson Act Contract.

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

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: The project site does not contain forest lands or timberland. The County of San Diego does not have any existing Timberland Production Zones. In addition, the project is consistent with existing zoning and a rezone of the property is not proposed. Therefore, project implementation would not conflict with existing zoning for, or cause rezoning of, forest land, timberland or timberland production zones.

d) Result in the loss of forest land or conversion of forest land to non-forest use?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: The project site, including any off-site improvements, do not contain any forest lands as defined in Public Resources Code section 12220(g), therefore project implementation would not result in the loss or conversion of forest land to a non-forest use. In addition, the project is not located in the vicinity of off-site forest resources.

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

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: While the proposed project site is located on Prime Farmland and Farmland of Local Importance, the proposed project is located entirely within an existing sewer easement and would not change the existing land use. Additionally, the project site does not contain lands designated as Unique Farmland or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency. Therefore, no agricultural resources would be converted to a non-agricultural use.

III. AIR QUALITY

Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:

a) Conflict with or obstruct implementation of applicable air quality plans?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: The project proposes sanitary sewer line facility improvements that would not affect implementation of applicable air quality plans or SANDAG growth projections used in development of the RAQS and SIP. The project proposes to rehabilitate a section of an existing sanitary sewer pipeline. The project does not propose a change in land use designation or development that would result in operational emissions. Therefore, there would not be operational emissions, and, therefore, the project would not conflict or obstruct implementation of applicable air quality plans, the RAQS or the SIP on a project-based or cumulative level.

b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

In general, air quality impacts from land use projects are the result of emissions from motor vehicles, and from short-term construction activities associated with such projects. The San Diego County Land Use Environment Group (LUEG) has established guidelines for determining significance which incorporate the Air Pollution Control District's (SDAPCD) established screening-level criteria for all new source review (NSR) in APCD Rule 20.2. These screening-level criteria can be used as numeric methods to demonstrate that a project's total emissions (e.g. stationary and fugitive emissions, as well as emissions from mobile sources) would not result in a significant impact to air quality. Since APCD does not have screening-level criteria for emissions of volatile organic compounds (VOCs), the use of the screening level for reactive organic compounds (ROC) from the South Coast Air Quality Management District (SCAQMD) for the Coachella Valley (which are more appropriate for the San Diego Air Basin) are used.

The proposed project is located within the San Diego Air Basin (SDAB). Under the California Ambient Air Quality Standard (CAAQS), the SDAB is presently in non-attainment for the 1-hour and 8-hour concentrations for Ozone (O₃). SDAB is also presently in non-attainment for the annual geometric mean and for the 24-hour concentrations of Particulate Matter less than or equal to 10 microns (PM₁₀) and 2.5 microns (PM_{2.5}). O₃ is formed when VOCs and nitrogen

oxides (NO_x) react in the presence of sunlight. VOC sources include any source that burns fuels (e.g., gasoline, natural gas, wood, oil); solvents; petroleum processing and storage; and pesticides. Sources of PM₁₀ in both urban and rural areas include: motor vehicles, wood burning stoves and fireplaces, dust from construction, landfills, agriculture, wildfires, brush/waste burning, and industrial sources of windblown dust from open lands.

Less Than Significant Impact: The project proposes to rehabilitate a section of an existing sanitary sewer pipeline. This would protect and stabilize the long-term safety and reliability of the sewer pipeline, to reduce the likelihood of future sewage spills and damage caused by pipe erosion.

No operational source of emissions are proposed as part of the project. However, short-term air quality emissions associated with construction of the proposed project could include emissions of: PM₁₀, PM_{2.5}, NO_x, SO_x, CO, and VOCs. Grading activities associated with the construction would be subject to the San Diego County Grading, Clearing and Watercourses Ordinance, which requires the implementation of dust control measures. Emissions from construction would be limited to the duration of construction earthwork, localized, and temporarily resulting in PM₁₀ and VOC emissions below the screening-level criteria established by the LUEG guidelines for determining significance.

As stated above, the objective of the project is to rehabilitate and protect an existing sewer pipeline. The project would not increase vehicle trips, vehicles miles travelled, or roadway capacity. Therefore, potential operation emissions associated with the proposed project are not expected to create a cumulatively considerable impact, nor a considerable net increase in criteria pollutants. As such, the proposed project's potential impacts due to cumulatively considerable net increase of criteria pollutants would be less than significant.

The construction-related emissions of the criteria pollutants would not exceed the County's significance level thresholds for construction and, therefore, would not cause a significant direct impact. These thresholds were developed based on the CAA de minimis level, which are designed to provide limits below which project emissions from an individual project would not significantly affect regional air quality or the timely attainment of the NAAQS and CAAQS. The construction contractor is required to incorporate standard County-required dust control measures, and construction is expected to be short-term (6 months), and the project would not result in operational emissions. Upon review of cumulative projects in the vicinity of the County's proposed project, none were identified that would contribute to a significant air quality impact in combination with the proposed project. Therefore, the project would not result in a cumulatively considerable net increase in emissions of ozone, PM₁₀, or PM_{2.5}, and impacts would be less than significant.

c) Expose sensitive receptors to substantial pollutant concentrations?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Air quality regulators typically define sensitive receptors as schools (Preschool-12th Grade), hospitals, resident care facilities, or day-care centers, or other facilities that may house individuals with health conditions that would be adversely impacted by changes in air quality. The County of San Diego also considers residences as sensitive receptors since they house children and the elderly.

Less Than Significant Impact: The project proposes to rehabilitate a section of an existing sanitary sewer pipeline. This would protect and stabilize the long-term safety and reliability of the sewer pipeline, to reduce the likelihood of future sewage spills and damage caused by pipe erosion. The project is located in a commercial and residential land use area. Due to construction methods to reduce particulate matter and the limited duration of proposed grading, this project does not propose uses or activities that would result in exposure of these identified sensitive receptors to significant pollutant concentrations and would not place sensitive receptors near carbon monoxide hotspots. In addition, the project would not contribute to a cumulatively considerable exposure of sensitive receptors to substantial pollutant concentrations because the proposed project, as well as the listed projects, have emissions below the screening-level criteria established by the LUEG guidelines for determining significance. Therefore, the potential for the proposed project to expose sensitive receptors to substantial concentrations due to temporary construction or operational impacts of the proposed project would be considered less than significant.

d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: The project proposes to rehabilitate a section of an existing sanitary sewer pipeline. A temporary bypass pipeline will be used during the construction to divert sewer material away from construction areas so that there will not be areas of the sewer facility exposed to open air. The project does not include the construction or operation of heavy industrial or agricultural uses that are typically associated with odor complaints. During construction, use of the temporary bypass pipeline and diesel equipment may generate some temporary nuisance odors. However, exposure to odors associated with project construction would be short-term and temporary in nature. There would be no permanent or operational source of odors associated with the project. Therefore, the project would not result in the creation of objectionable odors or other emissions that may affect a substantial number of people.

IV. BIOLOGICAL RESOURCES

Section IV of the IS/MND is based on the Biological Resources Letter Report for the Los Cochets Creek Sewer Improvements Project, dated June 12, 2020 (BRLR), prepared by RECON Environmental, Inc. Citations to impacts and mitigation are listed as referenced in the BRLR.

Would the project:

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

- | | |
|--|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input checked="" type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less Than Significant With Mitigation Incorporated:

The BRLR includes a comprehensive review of the biological resources present and potentially present at the project site, as determined by surveys conducted by a qualified biologist in 2019 and 2020. Biological resources were mapped within the project footprint and an additional 20-foot buffer. Eleven vegetation communities, including six sensitive vegetation communities – southern willow scrub, mule fat scrub, herbaceous wetland, southern riparian forest, southern coast live oak riparian forest, and non-native riparian – were mapped with the survey area. Although no sensitive wildlife species were observed, seven species – Coronado skink, coastal whiptail, San Diego legless lizard, Cooper’s hawk, yellow warbler, western red bat, and southern mule deer – have a moderate to high potential to occur. None of these species are state or federally listed as endangered or threatened. However, all are County of San Diego Group 1 or Group 2 species and many are California Department of Fish and Wildlife (CDFW) species of special concern. Additionally, Cooper’s hawk and southern mule deer are Multiple Species Conservation Program (MSCP)-covered species, and Cooper’s hawk is a CDFW watch list species. No sensitive plant species were observed or have the potential to occur.

To reduce impacts to sensitive species during the Migratory Bird Treaty Act (MBTA) general avian breeding season (February 1-September 15) and/or the raptor breeding season (January 15-July 15), construction in or adjacent to suitable habitat shall be avoided to the extent feasible. However, impacts to species may occur if earthwork or vegetation trimming/clearing will occur during the avian breeding season, including impacts to roosting western red bats. The following impacts will be addressed through avoidance/mitigation measures as follows:

BIO-3: Temporary impacts as a result of vegetation trimming and permanent impacts as a result of earthwork to a combined total of 0.21 acre of suitable habitat types has potential to result in significant direct impacts to Cooper’s hawk and yellow warbler. Additionally, increased noise levels due to construction during the breeding seasons for these species (January 15 to July 15) for Cooper’s hawk and February 1 to August 31 for yellow warbler) could result in indirect impacts to any individuals determined to be nesting within the habitats adjacent to the project impact areas.

Nesting bird species covered under the MBTA or CFGC Section 3503 also have potential to be directly impacted by the temporary impacts, as a result of vegetation trimming and permanent impacts as a result of earthwork.

BIO-4: Direct impacts to roosting western red bats could occur during any vegetation trimming of trees with potential to support this species day-roosting. This would be significant and would require species-specific avoidance, minimization, and/or mitigation measures.

Implementation of mitigation measures MIT-BIO-3 and MIT-BIO-4 would reduce impacts to the sensitive birds, raptors and mammals with moderate to high potential to occur within the proposed project area to a level less than significant.

MIT-BIO-3: To avoid direct impacts to potentially nesting individuals of sensitive bird species, a qualified biologist will conduct a survey prior to the start of construction activities. The pre-construction survey will be conducted within 10 calendar days prior to the start of construction activities (including removal of vegetation). If an active bird nest is found, additional measures will be implemented to ensure that take of birds or eggs or disturbance of breeding activities is avoided. With implementation of these measures, the project is expected to avoid significant direct and indirect impacts to Cooper's hawk and yellow warbler, as well as species protected by the MBTA or California Fish & Game Code (CFGC).

MIT-BIO-4: To avoid direct impacts to any potentially roosting western red bats, a biological monitoring will survey any trees with potential to support this species that are proposed for trimming immediately prior to the trimming activities. If any trees are occupied by western red bat, additional avoidance/mitigation measures will be implemented, as recommended by the biological monitor. The biological monitor will be present during all vegetation removal and tree trimming at the occupied habitat. With the implementation of these measures, the project is expected to avoid significant direct impacts to western red bat.

Cumulative impacts from the project were evaluated with regard to past, present, and future projects within the project vicinity. While there would be a small permanent loss of riparian habitat, the impacts would be minimal and are not expected to contribute to cumulative loss of habitat for sensitive wildlife species with potential to occur on or around the proposed project area.

Therefore, any substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service will be mitigated to a level below significance.

b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?

- | | |
|--|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input checked="" type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less Than Significant With Mitigation Impact: Earthwork is required in areas where structural reinforcements are necessary in sections of the pipeline. Proposed earthwork areas contain

riparian habitat and other sensitive natural communities including Herbaceous Wetland, Southern Riparian Forest, Southern Coast Live Oak Riparian Forest, and Non-Vegetated Channel, as defined by the County of San Diego MSCP, CDFW, US Fish and Wildlife Service. No sensitive plant species were observed or have a moderate or high potential to occur within the proposed project site. The acreages of vegetation communities/land cover types throughout the survey area are listed in Table 1 below.

Table 1 Vegetation Communities On-site	
Vegetation Type	Acres
No Tier	
Non-vegetated Channel	0.42
Tier I	
Southern Willow Scrub	0.02
Mule Fat Scrub	0.02
Herbaceous Wetland	0.07
Southern Riparian Forest	0.40
Southern Coast Live Oak Riparian Forest	0.53
Non-native Riparian	0.01
Tier IV	
Eucalyptus Woodland	0.44
Non-native Woodland	0.21
Disturbed Habitat	3.45
Urban/Developed	5.33
Total	10.90

Within the 10.90-acre survey area, the proposed project would result in permanent impacts to minor sections of vegetation communities due to the installation of ACB within the three pipe replacement and concrete encasement areas. Temporary impacts to vegetation and non-vegetated land would result from the installation of CIPP, potentially requiring trimming of vegetation around some maintenance holes, and vegetation clearing in access routes for equipment. As shown in Table 2 below, direct impacts as a result of earthwork for pipe replacement and concrete encasement total 0.10 acre, including 0.07 acre of permanent impacts and 0.03 acre of temporary impacts, resulting from the installation of ACB. However, because the interlocking ACB is constructed with voids of 30%, they can support vegetation and these areas would be backfilled with native soil and revegetated using native hydroseed, therefore permanent impact calculations here are reduced by 30 percent.

BIO-1: A total of 0.03 acre of permanent impacts would occur to sensitive vegetation communities, including herbaceous wetland and southern riparian forest, and 0.21 acre of temporary impacts to mule fat scrub, herbaceous wetland, southern riparian forest, and southern coast live oak riparian forest. The acreages of vegetation communities/land cover types and permanent and temporary impacts are listed in Table 2.

Table 2 Project Impacts to Vegetation Communities/Land Cover Types and Mitigation Required					
Vegetation Community/Land Cover Type	Survey Area (acres)	Temporary Impacts (acres) ¹	Permanent Impacts (acres)	Mitigation Ratio for Permanent Impacts ²	Mitigation Required
Southern Willow Scrub (Tier I)	0.02	0.00	0.00	1:1	--
Mule Fat Scrub (Tier I)	0.02	0.01	0.00	1:1	--
Herbaceous Wetland (Tier I)	0.07	0.01 ³	0.02 ³	1:1	0.02
Southern Riparian Forest (Tier I)	0.40	0.10 ³	0.01 ³	1:1	0.01

Southern Coast Live Oak Riparian Forest (Tier I)	0.53	0.09	0.00	1:1	--
Non-native riparian (Tier I ⁴)	0.01	0.00	0.00	0:1	--
Non-vegetated channel (No Tier ⁵)	0.42	0.09 ³	0.01 ³	0:1	--
Eucalyptus Woodland (Tier IV)	0.44	0.07	0.00	0:1	--
Non-native Woodland (Tier IV)	0.21	0.05	0.00	0:1	--
Disturbed Habitat (Tier IV)	3.45	0.44 ³	0.02 ³	0:1	--
Urban/Developed (Tier IV)	5.33	0.45 ³	0.01 ³	0:1	--
Total	10.90	1.31³	0.07³	--	0.03

¹Areas of temporary impacts to Tier I vegetation communities would be restored to their pre-impact conditions.
²Ratios may vary based on the location of mitigation and whether or not it meets the definition of a Biological Resources Core Area
³Permanent impact totals have been reduced by 30 percent and the reduced acreages has been added to their respective temporary impact totals.
⁴No mitigation ratio is proposed for this community because it is dominated by a California Invasive Plant Council high rated non-native plant species. However, this vegetation may be considered wetland waters of the U.S. and/or State and mitigation may be required as part of project-specific permits.
⁵Non-vegetated channel is not considered a sensitive vegetation community, but mitigation for impacts to these areas would likely be required by the wetland agencies.

MIT-BIO-1: In-kind mitigation for 0.01 acre of permanent impacts to southern riparian forest and 0.02 acre of permanent impacts to herbaceous wetland shall occur at a 1:1 ratio, in accordance with the MSCP. This compensatory mitigation may occur via onsite restoration/habitat creation or off-site through preservation or purchase of mitigation credits at an approved mitigation bank. Mitigation for impacts to temporarily impacted sensitive vegetation communities will occur via the restoration of these temporary impact areas to their pre-impact conditions.

No substantial edge effects will be created through the impacts to vegetation communities due to the small size of the impact areas and the abundance of existing disturbed habitat throughout the surrounding area. The use of ACB to overlay the pipe within the pipe replacement and concrete encasement areas will provide stabilization of the streambed surfaces and is not expected to significantly alter the hydrologic regime of the creek. Other potential construction-related indirect impacts (erosion, dust, etc.) are expected to be minimal, due to the small size of the project and construction BMP measures. Therefore, indirect impacts to vegetation communities are not expected to be significant.

To avoid any cumulative impacts to these vegetation communities, the project will comply with CDFW or US Fish and Wildlife Service-approved compensatory mitigation for permanent impacts to sensitive vegetation communities. No sensitive plant species will be impacted by the project.

Therefore, any adverse effect, whether direct or indirect, on riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the CDFW or US Fish and Wildlife Service, will be mitigated to a level below significance.

c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

- Potentially Significant Impact Less than Significant Impact
 Less Than Significant With Mitigation Incorporated No Impact

Discussion/Explanation:

Less Than Significant Impact With Mitigation Incorporated: The USFWS has developed a series of maps, known as the National Wetlands Inventory (NWI) to illustrate wetlands and deepwater habitat across the country. A review of this database showed Freshwater Forested/Shrub Wetland and Riverine NWI features within the proposed project area. The field investigation showed proposed earthwork areas generally parallel to the Creek, crossing it in many locations.

The project proposes permanent and temporary impacts from the earthwork and placement of ACB to overlay concrete encasement areas. The use of ACB for pipeline stabilization, in lieu of poured concrete, was selected in an effort to reduce the placement of permanent fill in the streambed while meeting the structural requirements to preserve the sewer pipeline. It is designed with large voids to allow the percolation of water and plant establishment, allowing for minimal impacts to the functions and values of Los Coches Creek. The permanent and temporary impacts to jurisdictional areas are listed in BIO-2 and in Table 3 below.

BIO-2: A total of 0.024 acre of permanent impacts would occur to Wetland Waters of the U.S./State and an additional 0.003 acre of permanent impacts would occur to Wetland Waters of the State. Permanent impacts to Non-wetland Waters of the U.S./State would total 0.015 acre and 100 linear feet. A total of 0.027 acre of temporary impacts would occur to Wetland Waters of the U.S./State and an additional 0.183 acre of temporary impacts would occur to Wetland Waters of the State. Temporary impacts to Non-wetland Waters of the U.S./State would total 0.105 acre and 344 linear feet.

MIT-BIO-2: Unavoidable impacts to jurisdictional waters may be authorized by the USACE through the Section 404 Permit Program, by the CDFW through a 1602 Streambed Alteration Agreement, and by the RWQCB through a 401 State Water Quality Certification. Approved impacts to USACE, CDFW, and RWQCB jurisdictional waters require mitigation through habitat creation, enhancement, and/or credits in a mitigation bank to achieve a no-net loss of jurisdictional waters.

Mitigation will be analyzed as part of the consultation process with applicable jurisdictional agencies and implemented as conditions of the project. The non-wetland waters portions of Los Coches Creek that will be temporarily impacted by the use of access routes that cross the creek channel and would be restored to their pre-impact contours and conditions. The restoration of temporarily impacted jurisdictional areas will be analyzed as part of the consultation process.

**Table 3
 Project Impacts to Jurisdictional Areas**

Jurisdictional Areas	Total Survey Area in Acres (linear feet)	Temporary Impacts in Acres (linear feet)	Permanent Impacts in Acres (linear feet)
USACE Total Jurisdiction	0.667 (1,567)	0.132 (344)	0.039 (100)
Wetland Waters of the U.S.	0.131	0.027	0.024
Non-wetland Waters of the U.S.**	0.536 (1,567)	0.105 (344)	0.015 (100)
CDFW and RWQCB Total Jurisdictional Areas*	1.270 (1,567)	0.288 (344)	0.042 (100)
Wetland Waters of the State (Riparian Habitat)	0.734	0.183	0.027
Non-wetland Waters of the State (Streambed)**	0.536 (1,567)	0.105 (344)	0.015 (100)

*CDFW/RWQCB area of jurisdiction includes all USACE jurisdictional waters.
**Non-wetland waters/streambed area not included in the wetland/riparian areas so that no area is counted twice for the same jurisdiction.

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

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less than Significant Impact: The BRLR determined that several non-special status wildlife species have a moderate to high potential to occur within the survey area and could be affected by the project: Coronado skink, San Diegan whiptail, San Diegan legless lizard, Cooper’s hawk, yellow warbler, western red bat, and southern mule deer. Potential impacts to these wildlife species will be mitigated by pre-construction biological surveys, and in conjunction with the habitat-based mitigation. No sensitive wildlife species were observed on or around the proposed project area. Movement of large terrestrial wildlife is not expected to occur through the survey area, which is mostly constrained by surrounding development. Wildlife occurring within the large expanses of undeveloped land south and east of the survey area as part of the Crestridge Ecological Reserve may occasionally utilize the survey area, including Los Coches Creek. However, the creek and survey area contain a patchwork of developed and undeveloped land and do not provide connectivity to any other large areas of undeveloped land. Therefore, the survey area does not function as a wildlife movement corridor.

Further, the project site is not located within or adjacent to any USFWS-designated critical habitat. The natural habitat within the proposed project earthwork is limited to impacts to herbaceous wetland, southern riparian forest, and non-vegetated channel. Therefore, while the project earthwork would cause temporary and minimal permanent impacts to a number of sensitive vegetation communities and sensitive animal species, the project would not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, and, therefore, impacts would be less than significant.

e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less Than Significant Impact: The proposed project site is located within the adopted South County MSCP and is located on lands designated by the MSCP as “Unincorporated Land in Metro-Lakeside-Jamul Segment”. The project would comply with the County’s MSCP Subarea

Plan, Biology Guidelines, and BMO; therefore, the project would not affect the subregional NCCP Process. Mitigation measures MIT-BIO-1, discussed in this Initial Study, Biological Resources Section IV(b) and MIT-BIO-2, discussed in Section IV(c), are proposed to reduce the impact to a level of less than significant. By incorporating these measures, the proposed project will not conflict with the provisions of any adopted Habitat Conservation Plan, Natural Communities Conservation Plan, other approved local, regional or state habitat conservation plan or any other local policies or ordinances that protect biological resources.

If construction activities are to occur within the MBTA avian or raptor breeding season as discussed in BIO-3 or BIO-4 in Section IV (a), pre-construction surveys as discussed in Biological Resources Section IV(a) MIT-BIO-3 and MIT-BIO-4 will preclude impacts to nesting birds.

The proposed project is exempt from the County's RPO, which regulates land within unincorporated San Diego County, because the project is an essential public facility pursuant to Article 5 (Exemptions), No. 3. Therefore, the proposed project would not conflict with this local policy, protecting biological resources.

f) Conflict with the provisions of any adopted Habitat Conservation Plan, Natural Communities Conservation Plan (NCCP), or other approved local, regional or state habitat conservation plan?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less Than Significant Impact: The County's MSCP Subarea Plan was prepared to guide implementation of the MSCP Plan in the South County subarea, including the project area. The proposed project site is located within the adopted South County MSCP and is located on lands designated by the MSCP as "Unincorporated Land in Metro-Lakeside-Jamul Segment". The project is consistent with the County's MSCP Subarea Plan, Biology Guidelines, including mitigation ratios, and the Biological Mitigation Ordinance; therefore, the project would not affect the subregional NCCP Process.

As such, mitigation measures MIT-BIO-1, discussed in this Initial Study, Biological Resources Section IV(b) and MIT-BIO-2, discussed in Section IV(c), are consistent with MSCP mitigation requirements and are proposed to reduce the impact to a level of less than significant. By incorporating these measures, the proposed project would not conflict with the provisions of any adopted Habitat Conservation Plan, NCCP, other approved local, regional or state habitat conservation plan or any other local policies or ordinances that protect biological resources.

The proposed project is exempt from the County's RPO, which regulates land within unincorporated San Diego County, because the project is an essential public facility pursuant to Article 5 (Exemptions), No. 3. Therefore, the proposed project would not conflict with this local policy protecting biological resources, including adopted habitat conservation plans.

V. CULTURAL RESOURCES

Section V of this IS/MND is based on the Negative Cultural Resources Survey Report for the Los Coches Sanitary Sewer Improvements from Maintenance Hole LSMH0555 to LSMH0599 Report prepared by Carmen Zepeda-Herman, Project Archaeologist of RECON Environmental, Inc., on May 22, 2020 (Cultural Report).

Would the project:

a) Cause a substantial adverse change in the significance of a historical resource, pursuant to CEQA Section 15064.5?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: Based on an analysis of records and a survey of the project site by the Project Archaeologist on May 7, 2020, it has been determined that there are no impacts to historical resources because they do not occur within the project site. Therefore, the proposed project would not cause a substantial adverse change in the significance of a historical resource, pursuant to CEQA Section 15064.5.

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Section 15064.5?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: Based on an analysis of records and a survey of the project site by the Project Archaeologist on May 7, 2020, it has been determined that the project site does not contain archeological resources. The results of the survey are provided in the Cultural Report. Therefore, the proposed project would not cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Section 15064.5.

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

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: Based on an analysis of records and a survey of the site by the Project Archaeologist on May 7, 2020, it has been determined that the project would not disturb any human remains

because the project site does not include a formal cemetery or any archaeological resources that might contain interred human remains. The results of the survey are provided in the Cultural Report. Therefore, the proposed project would not disturb human remains, including those interred outside of formal cemeteries.

VI. ENERGY

Would the project:

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

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less than Significant Impact: The project proposes to rehabilitate a section of an existing sanitary sewer pipeline. This would protect and stabilize the long-term safety and reliability of the sewer pipeline, to reduce the likelihood of future sewage spills and damage caused by pipe erosion. The project does not involve or introduce ongoing operational uses that would create a new source of energy consumption. During construction, temporary consumption of energy resources would occur for the purpose of equipment and materials, but the duration and area of construction are limited. Compliance with local, state, and federal regulations, which limit engine idling times and require recycling construction debris, would reduce short-term energy demand during the proposed project's construction to the extent feasible, and project construction would not result in a wasteful or inefficient use of energy. There are no unusual project characteristics or construction processes that would require the use of equipment that would be more energy-intensive than is used for comparable activities or use of equipment that would not conform to current emissions standards and related fuel efficiencies. Furthermore, individual project elements are required to be consistent with County policies and emissions reductions strategies, and therefore, would not consume energy resources in a wasteful, inefficient, or unnecessary manner.

b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

State and local authorities regulate energy use and consumption through various means and programs. These regulations at the state level intended to reduce energy use and greenhouse gas (GHG) emissions. These include, among others, Assembly Bill (AB) 1493–Light-Duty Vehicle Standards, California Code of Regulations Title 24, Part 6–Energy Efficiency Standards, California Code of Regulations Title 24, Part 11–California Green Building Standards.

No Impact: On February 14, 2018, the County Board of Supervisors adopted the Climate Action Plan (CAP), which identifies specific strategies and measures to reduce GHG emissions in the largely rural, unincorporated areas of San Diego County, as well as County government operations. The CAP updates and implements the County's 2011 General Plan Update goals, policies, and mitigation measures to meet the state's 2020 and 2030 GHG reduction targets, and demonstrates progress towards a 2050 GHG reduction goal (County 2018). The CAP contains 11 strategies, 26 GHG reduction measures, and supporting efforts organized under five GHG emissions categories: Built Environment and Transportation, Energy, Solid Waste, Water and Wastewater, and Agriculture and Conservation. Although the County's CAP is currently in litigation, the proposed project's construction methods are consistent with the County's General Plan. Additionally, the project is consistent with the County plans, including the Strategic Energy Plan, Renewable Energy Plan, Comprehensive Strategic Plan to Reduce Waste, and is consistent with the SDG&E Long-term Resource Plan. Accordingly, the proposed project would not conflict with or obstruct plans for renewable energy or energy efficiency.

VII. GEOLOGY AND SOILS

Would the project:

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

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: The project is not located in a fault rupture hazard zone identified by the Alquist-Priolo Earthquake Fault Zoning Act, Special Publication 42, Revised 1997, Fault Rupture Hazards Zones in California, or located within any other area with substantial evidence of a known fault. Therefore, there would be no impact from the exposure of people or structures to adverse effects from a known fault-rupture hazard zone as a result of this project.

- ii. Strong seismic ground shaking?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: The project proposes to rehabilitate a section of an existing sanitary sewer pipeline. This would protect and stabilize the long-term safety and reliability of the sewer pipeline, to

reduce the likelihood of future sewage spills and damage caused by pipe erosion. The project does not propose buildings or structures that could expose people or structures to potential adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking.

iii. Seismic-related ground failure, including liquefaction?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less than Significant Impact: The project site is not within a “Potential Liquefaction Area” as identified in the County Guidelines for Determining Significance for Geologic Hazards. This indicates that the liquefaction potential at the site is low. In addition, the site is not underlain by poor artificial fill, however, it is located within a 100-year floodplain and floodway. Notwithstanding, the primary objective of the project is to improve the safety and reliability of the existing sewer line. The rehabilitation and stabilization of a section of this sewer line would reduce the likelihood of future spills and prevent damage caused by pipe erosion. There would be a less than significant impact from the exposure of people or structures to adverse effects from a known area susceptible to ground failure, including liquefaction. In addition, since liquefaction potential at the site is low, earthquake-induced lateral spreading is not considered to be a seismic hazard at the site and impacts would be less than significant.

iv. Landslides?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less Than Significant Impact: The project is located within an identified Landslide Susceptibility Area, as identified in the County Guidelines for Determining Significance for Geologic Hazards. However, there are no known landslides within or near the proposed project site, and no evidence of landslides or deep-seated slope instability were noted. Additionally, the proposed project is limited to stabilization of a section of an existing sanitary sewer pipeline. This would protect and stabilize the long-term safety and reliability of the sewer pipeline, to reduce the likelihood of future sewage spills and damage caused by pipe erosion. Because the proposed project’s earthwork footprint is small and is limited to improvement of existing facilities, and the fact that the geologic environment has a low probability to become unstable, the project would have less than significant impact from the exposure of people or structures to potential adverse effects from landslides.

b) Result in substantial soil erosion or the loss of topsoil?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
|---|--|

- Less Than Significant With Mitigation Incorporated No Impact

Discussion/Explanation:

Less than Significant Impact: According to the Soil Survey of San Diego County, the geology of the site consists of This geology is found in peninsular ranges and is composed of predominantly weakly metamorphosed andesitic to rhyolitic flows, tuff, agglomerate, and breccia, with minor sedimentary rocks and basalt. consists of Visalia sandy loam soils, which are moderately well-drained, very deep sandy loams, derived from granitic alluvium. These soils are found on alluvial fans and floodplains at 400 to 2,000 feet elevation. Visalia sandy loam (2 to 5 percent slopes) have a low shrink/swell potential, slow runoff, and a slight erosion hazard index (U.S. Department of Agriculture, Soil Conservation and Forest Service, 1973). The project would not result in significant unprotected erodible soils, despite being in a floodplain and wetlands, and, therefore, would not develop steep slopes. The proposed project would result in site disturbance and grading activity within the proposed project site. However, the proposed project is required to comply with the San Diego County Code of Regulations, Title 8, Zoning and Land Use Regulations, Division 7, Sections 87.414 (Drainage - Erosion Prevention) and 87.417 (Planting). A Stormwater Pollution Prevention Plan and a Stormwater Quality Management Plan will be prepared for the project. Finally, the plan would include the Best Management Practices to ensure sediment does not erode from the project site: installation of gravel bags, silt fencing, and fiber rolls and revegetation, as applicable. Due to these factors, it has been found that the project would not result in substantial soil erosion or the loss of topsoil.

In addition, the project would not contribute to a cumulatively considerable impact because the past, present and future projects included on the list of projects that involve grading or land disturbance are required to follow the requirements of the San Diego County Code of Regulations, Title 8, Zoning and Land Use Regulations, Division 7, Sections 87.414 (DRAINAGE - EROSION PREVENTION) and 87.417 (PLANTING); Order 2001-01 (NPDES No. CAS 0108758), adopted by the San Diego Region RWQCB on February 21, 2001; County Watershed Protection, Storm Water Management, and Discharge Control Ordinance (WPO) (Ord. No. 9424); and County Storm Water Standards Manual adopted on February 20, 2002, and amended January 10, 2003 (Ordinance No. 9426). Refer to Section XXI, Mandatory Findings of Significance, for a comprehensive list of the projects considered.

- c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in an on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

- Potentially Significant Impact Less than Significant Impact
 Less Than Significant With Mitigation Incorporated No Impact

Discussion/Explanation:

Less than Significant Impact: The project proposes to rehabilitate a section of an existing sanitary sewer pipeline. This would protect and stabilize the long-term safety and reliability of the sewer pipeline, to reduce the likelihood of future sewage spills and damage caused by pipe

erosion. Although the proposed project is located within an identified Landslide Susceptibility Area, as identified in the County Guidelines for Determining Significance for Geologic Hazards, the primary objective of the project is to complete sanitary sewer facilities improvements through sectional sewer line repairs. Although the project site is located in the Federal Emergency Management Agency (FEMA) and the County of San Diego's 100-year floodplain and 100-year floodway, the project proposes improvements to existing facilities and does not propose creation of new structures. Additionally, the proposed project involves grading that would result in the creation of areas overlain by Articulated Concrete Block; however, no buildings are being proposed and the project site is not located in a fault rupture hazard zone. Therefore, the stability of the geologic conditions of the project area would be less than significant as a result of the proposed sanitary sewer facilities improvements. For further information regarding landslides, liquefaction, and lateral spreading, refer to VII Geology and Soils, Question (a), i-iv listed above.

d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: The project proposes to rehabilitate a section of an existing sanitary sewer pipeline. This would protect and stabilize the long-term safety and reliability of the sewer pipeline, to reduce the likelihood of future sewage spills and damage caused by pipe erosion. The soil on site is identified as Visalia sandy loam with a surface at 2 to 5 percent slopes. No buildings are proposed to be constructed as part of the project. The project is not located on expansive soils, as defined within Table 18-1-B of the Uniform Building Code (1994). Visalia sandy loam soils have a low shrink/swell potential and represent no substantial risks to life or property because of the implementation of this project. This was confirmed by staff review of the Soil Survey for the San Diego Area, prepared by the US Department of Agriculture, Soil Conservation and Forest Service dated December 1973. Therefore, these soils would not create substantial risks to life or property.

e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: The project proposes to rehabilitate a section of an existing sanitary sewer pipeline. The project does not propose septic tanks or alternative wastewater disposal systems, as no wastewater would be generated.

f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: The site does not contain unique geologic features that have been listed in the County's Guidelines for Determining Significance for Unique Geology Resources, nor does the site support any known geologic characteristics that have the potential to support unique geologic features. According to the Soil Survey of San Diego County, the geology of the site consists of and not suitable for creation of fossils. Impacts to paleontological resources typically occur during grading activities (excavation) associated with project construction on previously undisturbed land, or redevelopment where much deeper grading in native soil is proposed. The project site is not located within an area likely to contain paleontological resources and is within an existing sewer easement subject to previous and ongoing maintenance. Furthermore, it is not anticipated that project construction would require depths of excavation that would reach previously undisturbed soil. Therefore, no impact would occur.

VIII. GREENHOUSE GAS EMISSIONS

Would the project:

a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

The State of California has developed guidelines to address the significance of climate change impacts based on Appendix G of the CEQA Guidelines, which contains two significance criteria for evaluating greenhouse gas (GHG) emissions of a project. CEQA Guidelines Section 15064.4 states that the "determination of the significance of greenhouse gas emissions calls for a careful judgment by the lead agency consistent with the provisions in Section 15064. A lead agency should make a good-faith effort, based to the extent possible on scientific and factual data, to describe, calculate or estimate the amount of greenhouse gas emissions resulting from a project."

Section 15064.4(b) further states that a lead agency should consider the following nonexclusive list of factors when assessing the significance of GHG emissions:

1. The extent to which the project may increase or reduce GHG emissions as compared to the existing environmental setting;

2. The extent to which project emissions exceed a threshold of significance that the lead agency determines applies to the project; and
3. The extent to which the project complies with regulations or requirements adopted to implement statewide, regional, or local plans for the reduction or mitigation for GHG emissions.

CEQA Guidelines Section 15064(h)(1) states that “the lead agency shall consider whether the cumulative impact is significant and whether the effects of the project are cumulatively considerable.” A cumulative impact may be significant when the project’s incremental effect, though individually limited, is cumulatively considerable.

GHGs include carbon dioxide, methane, hydrofluorocarbons, and nitrous oxide, among others. Human-induced GHG emissions are a result of energy production and consumption, and personal vehicle use, among other sources.

Less Than Significant Impact: The project involves structural improvements to an existing sewer pipeline, and GHG emissions would be temporarily emitted during the duration of construction activities. Temporary vehicular emissions from construction equipment would be the minimum necessary to perform the infrastructure improvements, and the engines are required to meet regulatory air quality requirements. Construction methods would include standard construction BMPs to minimize the release of particulate matter during earthwork. The project will not contribute ongoing operational emissions, as there are no GHGs associated with this section of sewer pipeline. Thus, for the proposed project, construction emissions are considered the only source of GHG emissions, are temporary and short-term during the construction period.

The County Sanitation District relies on a programmatic quantification of DPW infrastructure maintenance activities calculated in a Greenhouse Gas Guidance Letter dated July 2017 by RECON Environmental, Inc. Sewer line relining is a regular activity of DPW and the analysis used for emissions modeling to calculate GHG emissions for CIPP installation projects is based on typical assumptions. The modeled project scenario was estimated to emit 233 metric tons of carbon dioxide equivalents (MT CO₂E) per mile. Using the proposed project description length of approximately 7,300 linear feet, amounts to approximately 1.4 miles. Accordingly, this project is estimated to emit a total of 326.2 MT CO₂E.

A screening level based on the California Air Pollution Control Officers Association’s (CAPCOA) report CEQA & Climate Change has typically been used to determine whether further analysis would be needed to examine the GHG impacts of a proposed project (CAPCOA 2008). CAPCOA developed a 900 MT CO₂E per year screening threshold by analyzing the capture of 90 percent or more of future discretionary development for residential and commercial projects across the state. Direct and cumulative impacts would be potentially significant and require further analysis if the project results in emissions that exceed 900 MT CO₂E beyond current baseline emissions. Because the project would be completed during or after 2020, the 900 MT CO₂E screening threshold would no longer be applicable. Senate Bill (SB) 32 sets a GHG emission reduction target of 40 percent below 1990 levels by 2030, or 540 MT CO₂E. To achieve this target, a regression trajectory was projected reducing the operational year emissions target from the 900

MT CO₂E target in 2020 to the 540 MT CO₂E target in 2030. This trajectory is outlined in Table 4:

Table 4: GHG Significance Thresholds Trajectory	
Year	Emissions Threshold (MT CO ₂ e)
2020	900
2021	855
2022	813
2023	772
2024	734
2025	697
2026	662
2027	629
2028	598
2029	568
2030	540

Source: CAPCOA 2008; SB 32
 MT = metric tons; CO₂e = carbon dioxide equivalents
 Note: Emissions thresholds reduce by 4.98 percent each year to achieve SB 32's 2030 target.

The annual emissions screening level of 900 MT CO₂E was originally developed to address operational impact of GHG emissions from land use development. Since the introduction of the CAPCOA guidance, several air districts in the state have issued additional guidance that construction emissions should be included in assessment of operational GHG emissions by amortizing the total GHG construction emissions over the lifespan of a project, and then adding that amortized total to the operational emissions. This approach ensures all GHG emissions that occur from a project are included in the assessment. While similar to land use developments, different improvements or maintenance activities can vary depending on the improvement, unlike typical land use developments where an average lifespan is used, infrastructure projects should be assessed based on the specific improvement life span (e.g., 21-year lifespan on asphalt-concrete resurfacing). Greenhouse gas emissions would be approximately 326.2 metric tons of MT CO₂E or 16.3 MT CO₂E, when amortized over 20 years in accordance with County guidelines. Due to the minimal equipment required for this sewer pipeline rehabilitation, total project emissions (the sum of construction and operations) would be far below any relevant numerical threshold in the state. Furthermore, the project's incremental contribution to cumulative GHG emissions is determined to not be cumulatively considerable because emissions are far below relevant numerical thresholds. Impacts would be less than significant.

b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less Than Significant Impact: The State passed the Global Warming Solutions Act of 2006, commonly referred to as Assembly Bill (AB) 32, which set the GHG emissions reduction goal for the State of California into law. The law requires that by 2020, state emissions must be reduced to 1990 levels by reducing GHG emissions from significant sources via regulation, market mechanisms, and other actions. The State subsequently passed SB 32, which set an additional GHG emissions reduction goal for the State of California into law. The law requires that by 2030, state emissions must be reduced to 40 percent below 1990 levels by reducing GHG emissions from significant sources via regulation, market mechanisms, and other actions.

To implement State mandates to address climate change in local land use planning, local land use jurisdictions are generally preparing GHG emission inventories and reduction plans and incorporating climate change policies into local general plans to ensure development is guided by a land use plan that reduces GHG emissions. The County's General Plan incorporates various climate change goals and policies. These policies provide direction for individual development projects to reduce GHG emissions and help the County meet its GHG emission reduction targets identified in the County's Climate Action Plan (CAP).

On February 14, 2018, the County Board of Supervisors adopted the CAP, which identifies specific strategies and measures to reduce GHG emissions in the largely rural, unincorporated areas of San Diego County, as well as County government operations. The CAP updates and implements the County's 2011 General Plan Update goals, policies, and mitigation measures to meet the state's 2020 and 2030 GHG reduction targets, and demonstrates progress towards a 2050 GHG reduction goal (County 2018). The CAP contains 11 strategies, 26 GHG reduction measures, and supporting efforts organized under five GHG emissions categories: Built Environment and Transportation, Energy, Solid Waste, Water and Wastewater, and Agriculture and Conservation. Although the County's CAP is currently in litigation, the proposed project's construction methods are consistent with the County's General Plan. Additionally, the project is consistent with the County plans, including the Strategic Energy Plan, Renewable Energy Plan, Comprehensive Strategic Plan to Reduce Waste, and is consistent with the SDG&E Long-term Resource Plan. The project would not result in additional vehicular traffic and the project's incremental contribution to cumulative GHG emissions is determined to not be cumulatively considerable because emissions are far below relevant numerical thresholds. Impacts would be less than significant.

The project's minimal incremental contribution to cumulative GHG emissions is determined to not be cumulatively considerable because GHG emissions would be approximately 326.2 MT CO₂E or 16.3 MT CO₂E, when amortized over 20 years in accordance with County guidelines, is an amount far below any relevant numerical thresholds. The project's GHG emissions are, therefore, determined to be consistent with the CAP and General Plan which together are the most applicable plans, policies, or regulations adopted for the purpose of reducing the emissions of GHGs. Therefore, the project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

IX. HAZARDS AND HAZARDOUS MATERIALS

Would the project:

- a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: The project proposes to rehabilitate a section of an existing sanitary sewer pipeline. This would protect and stabilize the long-term safety and reliability of the sewer pipeline, to reduce the likelihood of future sewage spills and damage caused by pipe erosion. The project would not create a significant hazard to the public or the environment because it does not propose the storage, use, transport, emission, or disposal of hazardous substances, nor are hazardous substances proposed or currently in use in the immediate vicinity. In addition, the project does not propose to demolish any existing structures onsite and, therefore, would not create a hazard related to the release of asbestos, lead-based paint or other hazardous materials from demolition activities.

- b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: A single school located nearest to proposed construction activities is Rios Elementary School of the Cajon Valley Union School District, which is located approximately 0.20 mile to the south of the project site. However, the main objective of the proposed project is to rehabilitate a section of an existing sanitary sewer pipeline. Appropriate Best Management Practices would be implemented during construction to prevent effluents from leaving the project site. There are no Leaking Underground Storage Tanks (LUST), military or other hazardous material cleanup sites in the project area, per the GEOTRACKER listing, EPA's Superfund CERCLIS database, and CalSites EnviroStar database.

Therefore, due to the strict requirements that regulate hazardous substances and the fact that the project is not located in the vicinity of a known hazardous waste site and would occur in compliance with local, State, and Federal regulations, the 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 into the environment. Therefore, the project would not have an impact on an existing or proposed school.

- c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
|---|---|

- Less Than Significant With Mitigation Incorporated No Impact

Discussion/Explanation:

No Impact: As discussed in Section IX(b) above, the project is located within one-quarter mile of a school, however, the project does not propose the handling, storage, or transport of hazardous materials. Therefore, the project would not have any effect on an existing or proposed school.

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

- Potentially Significant Impact Less than Significant Impact
 Less Than Significant With Mitigation Incorporated No Impact

Discussion/Explanation:

No Impact: Based on site visits and regulatory database searches, the project site has not been subject to any recent release of hazardous substances. Four sites located within the project area are included in the following lists or databases: the State of California Hazardous Waste and Substances sites list compiled pursuant to Government Code Section 65962.5., the San Diego County Hazardous Materials Establishment database, the San Diego County DEH Site Assessment and Mitigation (SAM) Case Listing, the Department of Toxic Substances Control (DTSC), Site Mitigation and Brownfields Reuse Program Database (“CalSites” Envirostor Database), the Resource Conservation and Recovery Information System (RCRIS) listing, the EPA’s Superfund CERCLIS database or the EPA’s National Priorities List (NPL). Of the four sites, all are closed cleanup cases.

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

The County of San Diego DEH maintains the Site Assessment and Mitigation (SAM) list of contaminated sites that have previously or are currently undergoing environmental investigations and/or remedial actions. Four sites are listed in the DEH SAM Case Listing in the project area; however, all four cleanup cases have been closed by DEH and no further action is required.

The proposed project site is not on or within 2,000 feet of any properties listed in DTSC’s Site Mitigation and Brownfields Reuse Program Database (“CalSites” Envirostor Database). It is, therefore, not considered a contaminated property, and no precautions need to be taken by the proposed project as a result of this listing.

In summation, although the four sites in the vicinity of the proposed project are listed in the DEH SAM listing and/or Geotracker database, the project would not create a significant hazard to the public or the environment because all site remediation and clean up has occurred and would not contribute to a cumulatively considerable impact.

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: The proposed project is not located within an Airport Influence Area, Airport Safety Zone, or FAA Height Notification zone. The project involves the improvement a section of an existing sanitary sewer pipeline and does not propose construction of any structures. Therefore, the project would not constitute a safety hazard for people residing or working in the project area.

f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: The project is located within the Emergency Response Travel Time Screening 0 to 5 Minutes. However, the project is limited to the rehabilitation of a section of an existing sanitary sewer pipeline and would not affect the surrounding circulation network utilized for emergency access, which are up to County standards. Temporary construction traffic control will be used, as-needed, for the mobilization of construction equipment or to protect the safety of workers. At least one travel lane will be open at all times. No impact would occur.

g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: The proposed project is located in an area designated as State Responsibility Area under the Fire Responsibility category, as well as a Fire History zone. However, the project is limited to the rehabilitation of a section of an existing sanitary sewer pipeline. Therefore, the

proposed project would not expose people or structures to a significant risk of loss, injury or death involving wildland fires because the project would comply with the regulations relating to emergency access, water supply, and defensible space specified in the County Fire Code. Moreover, the project would not contribute to a cumulatively considerable impact, because all past, present and future projects in the surrounding area are required to comply with the County Fire Code.

X. HYDROLOGY AND WATER QUALITY

To fulfill its commitment and to comply with RWQCB Order No. RS-2019-0020 and Settlement Agreement described below, the Sanitation District developed the proposed project with the goal to improve and stabilize a section of an existing deteriorating sanitary sewer pipeline, to preclude potential future impacts to water quality in Los Coches Creek. The sewer main was damaged as result of stream bank erosion that occurred during a 25-year, 24-hour storm event near the end of February 2017. The damaged sewer main was discovered by Sanitation District staff during a routine maintenance inspection. Subsequently, a Notice of Violation and Investigative Order was issued to the District by the California Regional Water Quality Control Board. To resolve the pipeline failure and associated water quality violation, a settlement agreement was executed on February 1, 2019. The intent of this project is to strengthen and prevent potential future storm or erosion damage to the existing sewer pipeline.

Would the project:

a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less Than Significant Impact: The project proposes to rehabilitate a section of an existing sanitary sewer pipeline below a section of the ephemeral Los Coches Creek. This would protect and stabilize the long-term safety and reliability of the sewer pipeline, to reduce the likelihood of future sewage spills and damage caused by pipe erosion. The project would be required to implement applicable site design measures and/or source control BMPs and/or treatment control BMPs during construction to reduce potential pollutants to the maximum extent practicable from entering stormwater runoff. These measures may include inlet filter rolls, silt fencing, gravel bags, and erosion control recompacting and revegetation post-construction. These measures would enable the project to meet waste discharge requirements as required by the Land-Use Planning for New Development and Redevelopment Component of the San Diego Municipal Permit (SDRWQCB Order No. R9-2007-0001), as implemented by the San Diego County Jurisdictional Urban Runoff Management Program (JURMP) and Standard Urban Storm Water Mitigation Plan (SUSMP).

Finally, the project's conformance to the waste discharge requirements listed above ensures the project would not create cumulatively considerable water quality impacts related to waste discharge. The permit would require the project to conform to Countywide watershed standards

in the JURMP and SUSMP, derived from State regulation to address human health and water quality concerns. Therefore, the project would not contribute to a cumulatively considerable impact to water quality from waste discharges.

b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that project may impede sustainable groundwater management of the basin?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: The project lies in the San Diego hydrologic subarea, within the Lower San Diego Hydrologic Area (7.13). The project proposes to rehabilitate a section of an existing sanitary sewer pipeline within the unincorporated community of Lakeside in eastern San Diego County. This would protect and stabilize the long-term safety and reliability of the sewer pipeline, to reduce the likelihood of future sewage spills and damage caused by pipe erosion.

The project does not propose the use of groundwater for any purpose, including irrigation, domestic or commercial demands. In addition, the project does not involve operations that would interfere substantially with groundwater recharge including but not limited to: the project does not involve regional diversion of water to another groundwater basin; or diversion or channelization of a stream course or waterway with impervious layers. These activities and operations can substantially affect rates of groundwater recharge. Therefore, the project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin.

c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

i. Result in substantial erosion or siltation on- or off-site?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less Than Significant Impact: The project proposes to rehabilitate a section of an existing sanitary sewer pipeline. The proposed work is limited to: 1) the installation of a composite lining within the existing pipe, and 2) sectional concrete encasement and pipe replacement, along with a recompacted cover of the Articulated Concrete Block above the pipe section, to increase stability of the pipe in the event of erosion. This would protect and stabilize the long-term safety and reliability of the sewer pipeline, to reduce the likelihood of future sewage spills and damage caused by pipe material degradation and erosion. The project footprint is the minimum necessary to complete the work and would not include substantial alteration of the existing

drainage pattern of the site or area including through the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on- or off-site.

As part of the project's design and construction, the County would implement site design measures, source control, and/or treatment control BMPs to reduce potential pollutants, including sediment from erosion or siltation, to the maximum extent practicable from entering stormwater runoff. Therefore, the proposed project would result in less than significant impacts from erosion or siltation on- or off-site.

- ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less Than Significant Impact: The project proposes to rehabilitate a section of an existing sanitary sewer pipeline. The proposed work is limited to: 1) the installation of a composite lining within the existing pipe, and 2) sectional concrete encasement and pipe replacement, along with a recompacted cover of the Articulated Concrete Block above the pipe section, to increase stability of the pipe in the event of erosion. This would protect and stabilize the long-term safety and reliability of the sewer pipeline, to reduce the likelihood of future sewage spills and damage caused by pipe material degradation and erosion.

Therefore, the project would not substantially alter existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site. Moreover, the project would not contribute to a cumulatively considerable alteration or a drainage pattern or increase in the rate or amount of runoff, because the project would not substantially increase water surface elevation or runoff exiting the site, as detailed above.

- iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: The project proposes to rehabilitate a section of an existing sanitary sewer pipeline. The proposed work is limited to: 1) the installation of a composite lining within the existing pipe, and 2) sectional concrete encasement and pipe replacement, along with a recompacted cover of the Articulated Concrete Block above the pipe section, to increase stability of the pipe in the

event of erosion. This would protect and stabilize the long-term safety and reliability of the sewer pipeline, to reduce the likelihood of future sewage spills and damage caused by pipe material degradation and erosion. The project will not generate any runoff water post construction. Therefore, the project is not anticipated to create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide additional sources of polluted runoff.

i. Impede or redirect flood flows?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: The project proposes to rehabilitate a section of an existing sanitary sewer pipeline within its existing alignment and would not redirect or impact the timely direction of water flow. The project does not include structures that could be considered obstacles to flood flows. Therefore, the project would not impede or redirect flood flows.

d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: The proposed project is located more than a mile from the coast; therefore, in the event of a tsunami, the project site would not be inundated. The project site is not located along the shoreline of a lake or reservoir; therefore, the project site could not be inundated by a seiche. Although the project site is located in the Federal Emergency Management Agency (FEMA) and the County of San Diego's 100-year floodplain and 100-year floodway, the proposed project is limited to improvements of existing facilities with no change in alignment or capacity, and does not propose creation of new structures. Additionally, there is no risk of the release of pollutants due to project inundation in a flood hazard area. Therefore, no impact.

e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: The project would not create new sources of pollution that would obstruct implementation of a water quality control plan. Also, the project does not propose the use of groundwater for any purpose, including irrigation, domestic or commercial demands. In addition,

the project does not involve operations that would interfere substantially with groundwater recharge. Therefore, the proposed project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

XI. LAND USE AND PLANNING

Would the project:

a) Physically divide an established community?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: The project proposes to rehabilitate a section of an existing sanitary sewer pipeline and does not propose the introduction of new infrastructure such as major roadways, water supply systems, or utilities to the area. Therefore, the proposed project would not significantly disrupt or divide the established community.

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

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: The project proposes to rehabilitate a section of an existing sanitary sewer pipeline and is consistent with the County General Plan, and the Lakeside Community Plan, which perpetuates Lakeside's rural atmosphere. The project is consistent with the Multiple Species Conservation Plan (MSCP) and will mitigate impacts to sensitive vegetation communities in accordance with the Plan's required mitigation ratios. Therefore, the project does not cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

XII. MINERAL RESOURCES

Would the project:

a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: The project site has been classified by the California Department of Conservation – Division of Mines and Geology (Update of Mineral Land Classification: Aggregate Materials in the Western San Diego Production-Consumption Region, 1997) as an area of “Potential Mineral Resource Significance” (MRZ-3). However, the project site is surrounded by commercial land use and private residences. These land uses are incompatible with future extraction of mineral resources. Furthermore, the project is limited to rehabilitation an existing section of a sanitary sewer pipeline within a sewer easement without changing the alignment or capacity of the system; therefore, implementation of the project would not result in the loss of availability of a known mineral resource that would be of value.

b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: The project site is not located in an area or within 1,300 feet of lands designated as a locally-important mineral resource recovery site. Therefore, the proposed project would not result in the loss of availability of locally-important mineral resources.

XIII. NOISE

Would the project result in:

a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less Than Significant Impact: The project proposes to rehabilitate a section of an existing sanitary sewer pipeline. This would protect and stabilize the long-term safety and reliability of the sewer pipeline, to reduce the likelihood of future sewage spills and damage caused by pipe erosion.

There will be short-term noise associated with construction activities. Construction noise will be intermittent over the 6-month construction period and comply with Section 36.409 of the County of San Diego Noise Ordinance both in time of day and type of machinery.

County Noise Ordinance – Section 36.409

The project would not generate construction noise that may exceed the standards of the County of San Diego Noise Ordinance (Section 36.409). Construction operations will occur only during permitted hours of operation pursuant to Section 36.409. Also, it is not anticipated that the project will operate construction equipment in excess of an average sound level of 75dB between the hours of 7 AM and 7 PM.

With respect to construction noise, the proposed project would include a variety of construction activities, including grading and clearing, installation of Cured-In-Place Pipe, excavation using a mini-backhoe and a small skid loader for sectional pipe replacement and concrete encasement, installation of ACB material, and soil recompacting and revegetation. A temporary construction easement will be negotiated with affected adjacent parcel owners to acknowledge the proximity of construction activities. Construction noise levels are not anticipated to exceed 75 dB(A) at adjacent property lines. Therefore, noise levels from construction activities would not exceed the County threshold for construction and would be less than significant.

The proposed project would not expose people to potentially significant noise levels that exceed the allowable limits of the County of San Diego General Plan, County of San Diego Noise Ordinance, and other applicable standards for construction activities. Post-construction, the project would not generate new sources of operational noise in the vicinity.

To ensure construction noise is reduced to the extent feasible, the following design considerations are proposed:

- All construction equipment shall be properly maintained and equipped with noise-reduction intake and exhaust mufflers and engine shrouds, in accordance with manufacturers' recommendations. Equipment engine shrouds shall be closed during equipment operation.
- Whenever feasible, electrical power shall be used to run air compressors and similar power tools.
- Equipment staging areas should be located as far as feasible from occupied residences.

General Plan – Noise Element

The County of San Diego General Plan, Noise Element, Tables N-1 and N-2 addresses noise sensitive areas. Project implementation would not expose existing or planned noise sensitive areas to road, airport, heliport, railroad, industrial or other noise in excess of the 60 dBA CNEL or 65 dBA CNEL. Therefore, the project would not expose people to potentially significant noise levels that exceed the allowable limits of the County of San Diego General Plan, Noise Element.

Finally, the project's conformance to the County of San Diego General Plan Noise Element and County of San Diego Noise Ordinance (Section 36-404 and 36.410) ensures the project would not create cumulatively considerable noise impacts, because the project would not exceed the local noise standards for noise sensitive areas; and the project would not exceed the applicable noise level limits at the property line or construction noise limits, derived from State regulation to address human health and quality of life concerns. Therefore, the project would not contribute to a cumulatively considerable exposure of persons or generation of noise levels in excess of standards established in the local General Plan, Noise Ordinance, and applicable standards of other agencies.

b) Generation of excessive groundborne vibration or groundborne noise levels?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: The project does not propose construction of any of the following land uses that can be impacted by groundborne vibration or groundborne noise levels:

1. Buildings where low ambient vibration is essential for interior operation, including research and manufacturing facilities with special vibration constraints.
2. Residences and buildings where people normally sleep including hotels, hospitals, residences and where low ambient vibration is preferred.
3. Civic and institutional land uses including schools, churches, libraries, other institutions, and quiet office where low ambient vibration is preferred.
4. Concert halls for symphonies or other special use facilities where low ambient vibration is preferred.

The goal of the project is to rehabilitate a section of an existing sanitary sewer pipeline. The project does not propose any major, new, or expanded infrastructure such as mass transit, highways or major roadways, or intensive extractive industry that could generate excessive groundborne vibration or groundborne noise levels on-site or in the surrounding area.

c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: The proposed project is not located within the vicinity of a private airstrip or an airport land use plan or within two miles of a public airport or public use airport. Therefore, the project would not expose people residing or working in the project area to excessive airport-related noise levels.

XIV. POPULATION AND HOUSING

Would the project:

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

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: The project proposes to rehabilitate a section of an existing sanitary sewer pipeline without change to the alignment or capacity of the system. The proposed project would not induce substantial population growth because the project does not propose any physical or regulatory change that would remove a restriction to or encourage population growth in an area including, but limited to: new or extended infrastructure or public facilities; new commercial or industrial facilities; large-scale residential development; accelerated conversion of homes to commercial or multi-family use; or regulatory changes including General Plan amendments, Specific Plan amendments, zone reclassifications, sewer or water annexations; or LAFCO annexation actions.

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

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: The project proposes to rehabilitate a section of an existing sanitary sewer pipeline within its existing alignment and would not displace any existing housing, as no existing residential structures will be impacted by the project.

XV. PUBLIC SERVICES

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

- i. Fire protection?
- ii. Police protection?
- iii. Schools?
- iv. Parks?
- v. Other public facilities?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: The project proposes to rehabilitate a section of an existing sanitary sewer pipeline. This would protect and stabilize the long-term safety and reliability of the sewer pipeline, to reduce the likelihood of future sewage spills and damage caused by pipe erosion.

Existing utilities within the project site include sanitary sewer pipeline, potable water lines, power, and communication poles. However, these utilities would not be impacted by project construction.

Additionally, the project does not involve the construction of new or physically-altered governmental facilities, including but not limited to: fire protection facilities, sheriff facilities, schools, or parks in order to maintain acceptable service ratios, response times or other performance service ratios or objectives for any public services. Therefore, the project would not have an adverse physical effect on the environment because the project does not require new or significantly-altered services or facilities to be constructed.

XVI. RECREATION

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

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: The project proposes to rehabilitate a section of an existing sanitary sewer pipeline. This would protect and stabilize the long-term safety and reliability of the sewer pipeline, to reduce the likelihood of future sewage spills and damage caused by pipe erosion.

The project does not involve construction of new residences or in any way promote residential development. Therefore, 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.

b) Does the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: The project proposes to rehabilitate a section of an existing sanitary sewer pipeline. This would protect and stabilize the long-term safety and reliability of the sewer pipeline, to reduce the likelihood of future sewage spills and damage caused by pipe erosion. The project does not include improvement of recreational facilities or require the construction or expansion

of recreational facilities and will not have an adverse physical effect on the environment associated with recreational facilities.

XVII. TRANSPORTATION

Would the project:

a) Conflict with a program or plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

The County of San Diego Guidelines for Determining Significance for Traffic and Transportation (Guidelines) establish measures of effectiveness for the performance of the circulation system. These Guidelines incorporate standards from the County of San Diego Public Road Standards and Mobility Element, the County of San Diego Transportation Impact Fee Program and the Congestion Management Program.

No Impact: The project proposes to rehabilitate a section of an existing sanitary sewer pipeline. This would protect and stabilize the long-term safety and reliability of the sewer pipeline, to reduce the likelihood of future sewage spills and damage caused by pipe erosion. The project would not result in increased vehicle trips, vehicles miles travelled, or roadway capacity. Therefore, the project would not conflict with any applicable plan, ordinance or policy establishing measures of the effectiveness of the circulation system.

If construction detours or temporary road closures are required during temporary construction activities, the instances would be limited in time and scope as minimally necessary to mobilize equipment or materials. For most of the estimated 180-day construction duration, all roads would remain open to traffic. Therefore, access to residences along: Old Highway 80, Sierra Alta Way, Calle de Ernesto, Rios Canyon Road, Legacy Lane, Legacy Court, Kelli Lane, Pecan Park Lane, Costa Lane, Spring View Court, Soldin Lane, and any private roads or private driveways within the Project Impact Area would remain available.

b) Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3 subdivision (b)?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: The proposed project involves sewer pipeline improvements. As the proposed project would not change the traffic patterns or capacity, or result in increased vehicles miles

travelled, the project would not conflict or be inconsistent with CEQA Guidelines section 15064.3 subdivision (b).

c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: The project proposes to rehabilitate a section of an existing sanitary sewer pipeline. Accordingly, the project would not increase hazards, alter traffic patterns, place incompatible uses (e.g., farm equipment), or create or place curves, slopes, or walls which impedes adequate site distance on a road.

d) Result in inadequate emergency access?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: The project proposes to rehabilitate a section of an existing sanitary sewer pipeline. This would protect and stabilize the long-term safety and reliability of the sewer pipeline, to reduce the likelihood of future sewage spills and damage caused by pipe erosion. As discussed in Section XVII(a) above, access along: Olde Highway 80, Sierra Alta Way, Calle de Ernesto, Rios Canyon Road, Legacy Lane, Legacy Court, Kelli Lane, Pecan Park Lane, Costa Lane, Spring View Court, Soldin Lane, and any private roads or private driveways within the Project Impact Area would be provided at all times for emergency access. Periodic and temporary detours may be needed during equipment or materials mobilization, but the proposed project would not result in inadequate emergency access.

XVIII. TRIBAL CULTURAL RESOURCES

Would the project:

a) Cause a substantial adverse change in the significance of a tribal cultural resource, as defined in Public Resources Code §21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of Historical Resources as defined in Public Resources Code §5020.1(k), or

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
|---|---|

- Less Than Significant With Mitigation Incorporated No Impact

Discussion/Explanation:

No Impact: Tribal Cultural Resources are sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either included or determined to be eligible for inclusion in the CRHR or included in a local register of historical resources, as defined in subdivision (k) of Public Resources Code Section 5020.1. Pursuant to AB-52, consultation was initiated with culturally-affiliated Native American tribes. The County Sanitation District submitted consultation letters on May 26, 2020 to 9 (nine) tribes, including: Barona Group of the Capitan Grande, Campo Kumeyaay Nation, Iipay Nation of Santa Ysabel, Jamul Indian Village, Kwaaymii Laguna Band of Mission Indians, Manzanita Band of Kumeyaay Nation, San Pasqual Band of Mission Indians, Sycuan Band of the Kumeyaay Nation, and Viejas Band of Kumeyaay Indians. In accordance with the project-specific archaeological survey, no cultural resources were encountered during the field review by the Project Archaeologist and Native American monitor, and due to the nature of the site, no resources are expected during construction and, therefore, monitoring is not required.

- ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code §5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code §5024.1, the Lead Agency shall consider the significance of the resource to a California Native American tribe.

- Potentially Significant Impact Less than Significant Impact
 Less Than Significant With Mitigation Incorporated No Impact

Discussion/Explanation:

No Impact: Pursuant to AB-52, consultation was initiated with culturally-affiliated Native American tribes. The County Sanitation District submitted consultation letters on May 26, 2020 to 9 (nine) tribes, including: Barona Group of the Capitan Grande, Campo Kumeyaay Nation, Iipay Nation of Santa Ysabel, Jamul Indian Village, Kwaaymii Laguna Band of Mission Indians, Manzanita Band of Kumeyaay Nation, San Pasqual Band of Mission Indians, Sycuan Band of the Kumeyaay Nation, and Viejas Band of Kumeyaay Indians. A California Historical Resources Information System file search and cultural survey identified significant archaeological resources, as described in section V, Cultural Resources. In addition, the NAHC indicated that the results of the Sacred Lands File search were positive for the Study Area.

XIX. UTILITIES AND SERVICE SYSTEMS

Would the project:

- a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: The project proposes to rehabilitate a section of an existing sanitary sewer pipeline. This would protect and stabilize the long-term safety and reliability of the sewer pipeline, to reduce the likelihood of future sewage spills and damage caused by pipe erosion. Existing utilities within the project site include sanitary sewer pipeline, potable water lines, power, and communication poles. However, these utilities would not be impacted by project construction. Therefore, there would be no significant environmental effects caused by the construction or relocation of above-listed utilities associated with the project.

b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: The project proposes to rehabilitate a section of an existing sanitary sewer pipeline. The proposed project does not involve or require services from a water provider. Therefore, the project would not affect existing or future water supplies.

c) Result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: The project proposes to rehabilitate a section of an existing sanitary sewer pipeline. The project would not generate wastewater and, therefore, would not require a determination by a wastewater treatment provider regarding capacity to serve the project's projected demand.

d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: The project proposes to rehabilitate a section of an existing sanitary sewer pipeline. This would protect and stabilize the long-term safety and reliability of the sewer pipeline, to reduce the likelihood of future sewage spills and damage caused by pipe erosion. As part of the sewer pipeline improvements, the project may generate a negligible amount of solid waste or export material. All solid waste facilities, including landfills, require solid waste facility permits to operate. In San Diego County, the County Department of Environmental Health, Local Enforcement Agency issues solid waste facility permits with concurrence from the California Integrated Waste Management Board (CIWMB) under the authority of the Public Resources Code (Sections 44001-44018) and California Code of Regulations Title 27, Division 2, Subdivision 1, Chapter 4 (Section 21440et seq.). If the export of solid waste or other materials is needed, the project will deposit all solid waste at a permitted solid waste facility and, therefore, will comply with Federal, State, and local statutes and regulations related to solid waste. Therefore, the project would not generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals.

e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: The project proposes to rehabilitate a section of an existing sanitary sewer pipeline. This would protect and stabilize the long-term safety and reliability of the sewer pipeline, to reduce the likelihood of future sewage spills and damage caused by pipe erosion. As part of the sewer pipeline improvements, the project may generate a negligible amount of solid waste or export material. All solid waste facilities, including landfills, require solid waste facility permits to operate. In San Diego County, the County Department of Environmental Health, Local Enforcement Agency issues solid waste facility permits with concurrence from the California Integrated Waste Management Board (CIWMB) under the authority of the Public Resources Code (Sections 44001-44018) and California Code of Regulations Title 27, Division 2, Subdivision 1, Chapter 4 (Section 21440et seq.). If the export of solid waste or other materials is needed, the project will deposit all solid waste at a permitted solid waste facility and therefore, will comply with Federal, State, and local statutes and regulations related to solid waste. Therefore, the project would not generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals.

XX. WILDFIRE

If located in or near state responsibility areas or lands classified as very high fire severity zones, would the project:

a) Substantially impair an adopted emergency response plan or emergency evacuation plan?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: The project proposes to rehabilitate a section of an existing sanitary sewer pipeline. The project would not interfere with an adopted emergency response plan or emergency evacuation plan because it would not prohibit subsequent plans from being established or prevent the goals and objectives of existing plans from being carried out. Therefore, the project would not result an impact to emergency plans.

b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: The project proposes to rehabilitate a section of an existing sanitary sewer pipeline. This would protect and stabilize the long-term safety and reliability of the sewer pipeline, to reduce the likelihood of future sewage spills and damage caused by pipe erosion. Therefore, the proposed project would not add or increase occupants, or exacerbate wildfire risks thereby exposing occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire.

c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: The project proposes to rehabilitate a section of an existing sanitary sewer pipeline. As such, the project would not require the installation or maintenance of associated infrastructure that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment.

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

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
|---|---|

- Less Than Significant With Mitigation Incorporated No Impact

Discussion/Explanation:

No Impact: The project proposes to rehabilitate a section of an existing sanitary sewer pipeline. The project 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.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE

a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

- Potentially Significant Impact Less than Significant Impact
 Less Than Significant With Mitigation Incorporated No Impact

Discussion/Explanation:

Less Than Significant With Mitigation Incorporated: Per instructions for evaluating environmental impacts in this Initial Study, the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory were considered in the response to each applicable question of this form. In addition to project-specific impacts, this evaluation considered the projects potential for significant cumulative effects. Resources that have been evaluated as significant would be potentially impacted by the project, particularly biological resources. However, mitigation has been included that reduces these effects to a level below significance. This mitigation includes the following: impacts to sensitive vegetation communities and jurisdictional resources would require mitigation through habitat creation or enhancement to achieve no-net-loss of jurisdictional resources. In accordance with MIT-BIO-1 and MIT-BIO-2, such mitigation would be determined by a qualified biologist in consultation with the regulatory agencies during the permitting process. Additionally, impacts to wildlife species with moderate to high potential to occur within the proposed project would require MIT-BIO-3 and MIT-BIO-4 mitigation, which would reduce the impact to less than significant. As a result of this evaluation, there is no substantial evidence that, after mitigation, significant effects associated with this project would occur. Therefore, this project has been determined not to meet this Mandatory Finding of Significance.

b) Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

- Potentially Significant Impact Less than Significant Impact
 Less Than Significant With Mitigation Incorporated No Impact

Discussion/Explanation:

Less than Significant: Cumulative impacts evaluation includes review and analysis of past, present, and reasonably foreseeable future actions and their impact on environmental resources in the context of the proposed project. A list of the projects considered in the cumulative impact analysis is presented in Table 5. These projects are located within the unincorporated County of San Diego.

Table 5. Cumulative Projects

	Project Name	Project Status	Description
1	No Name; APN #3983205200	Open	Major Grading Permit
2	Lake Jennings Park Road	Open	Major Subdivision Improvement Plan/Grading Permit
3	7-11 Sign (#1039864)	Director Approved	Major Use Permit Minor Deviation
4	Lake Jennings Village, GPA, REZ, TM, STP	BOS Approved	General Plan Amendment/Rezoning
5	Lake Jennings Village	Approved	Plan Amendment Authorization
6	Lake Jennings Market Place	BOS Approved	General Plan Amendment/Rezoning/Major Use Permit/Rezoning
7	No Name; APN #3981100900	Open	Major Subdivision Improvement Plan
8	East Valley Christian Fellowship Major Use Permit	Director Approved	Major Use Permit Minor Deviation
9	No Name; APN #3981203000	Open	Grading Permit
10	2017 GP Clean Up	BOS Approved	General Plan Amendment
11	No Name; APN # 3981203700	Open	Grading Permit
12	Lakeside Tractor Supply Company MUP	PC Approved	Major Use Permit
13	Peter Rios Estates Apartment Complex	Issued	Grading Permit Major

Impacts associated with the proposed project would affect sensitive vegetation communities, potential impacts to avian and mammal species, and existing wetland and non-wetland Waters of the U.S. and State and CDFW jurisdictional areas, considered biological resources. These impacts would be mitigated to a level less than significant. All other project impacts to environmental resources would be less than significant without mitigation. As a result of this evaluation, there is no substantial evidence that there are cumulative effects associated with this project. Therefore, this project has been determined not to meet this Mandatory Finding of Significance.

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

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less than Significant Impact: In the evaluation of environmental impacts in this Initial Study, the potential for adverse direct or indirect impacts to human beings were considered in the response to certain questions in sections I. Aesthetics, III. Air Quality, VII. Geology and Soils, IX. Hazards and Hazardous Materials, X. Hydrology and Water Quality, XIII. Noise, XIV. Population and Housing, XVII. Transportation and Traffic, and XX. Wildfire. As a result of this evaluation, there is no substantial evidence that there are adverse effects on human beings associated with this project. Therefore, this project has been determined not to meet this Mandatory Finding of Significance.

XXII. REFERENCES USED IN THE COMPLETION OF THE INITIAL STUDY CHECKLIST

All references to federal, state and local regulation are available on the Internet. For federal regulation refer to <http://www4.law.cornell.edu/uscode/>. For state regulation refer to www.leginfo.ca.gov. For County regulation refer to www.amlegal.com. All other references are available upon request.

PROJECT-SPECIFIC REFERENCES

HELIX Environmental Planning, Inc. Air Quality and Greenhouse Gas Emission Technical Memorandum for the Sycuan-Sloane Trail Project, March 27, 2020.

RECON Environmental, Inc. Biological Resources Letter Report for the Los Coches Creek Sewer Improvements Project (RECON Number 9009-12), Lakeside, San Diego County, California. June 12, 2010.

RECON Environmental, Inc. Greenhouse Gas Guidance Letter (RECON Number 8249), July 13, 2017.

RECON Environmental, Inc. Negative Cultural Resources Survey Report for the Los Coches Sanitary Sewer Improvements from Maintenance Hole LSMH0555 to LSMH0599 Project #1023359, Lakeside, San Diego County, California. May 22, 2020.

AESTHETICS

California Street and Highways Code [California Street and Highways Code, Section 260-283. (<http://www.leginfo.ca.gov>)

California Scenic Highway Program, California Streets and Highways Code, Section 260-283. (<http://www.dot.ca.gov/hq/LandArch/scenic/scpr.htm>)

County of San Diego, Planning & Development Services. The Zoning Ordinance of San Diego County. Sections 5200-5299; 5700-5799; 5900-5910, 6322-6326. (www.co.san-diego.ca.us)

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MULTIPLE SPECIES CONSERVATION PROGRAM CONFORMANCE STATEMENT

County of San Diego Sanitation District: Los Cochets Sanitary Sewer Improvements from Maintenance Hole LSMH0555 to LSMH0599 Project

June 17, 2020

The project proposes the installation of a composite lining within the existing pipe and sectional concrete encasement and pipe replacement, along with a recompacted cover of the Articulated Concrete Block (ACB) above the pipe section, to increase stability of the pipe in the event of erosion. These improvements would protect and stabilize the long-term safety and reliability of the sewer pipeline, to reduce the likelihood of future sewage spills and damage caused by pipe material degradation and erosion. The project site is located within the Metro-Lakeside-Jamul segment of the County's Multiple Species Conservation Program.

Pursuant to the County of San Diego Biological Mitigation Ordinance (BMO), Attachment K, "List of San Diego County Vegetation Communities and Their Levels Within the MSCP," the proposed project does not contain habitat regulated by the BMO. Therefore, the project is not subject to the requirements of the BMO. While the proposed project is within the MSCP County Subarea Plan, regardless of exemption status, it would not conflict, or otherwise hinder, the MSCP preserve system.

The project site supports sensitive habitat and wildlife species; however, the site is not within a core, linkage, Preserve Area or other highly sensitive area, as designated by the MSCP.

Based on the above facts, County staff has determined that the proposed project will not hinder or conflict with the County Subarea Plan. No take authorization for incidental or deliberate impacts to state- or federally-listed species is granted with this determination. While no impacts to listed species are anticipated based on staff's review of the project, the Applicant is responsible for ensuring that none occur and/or appropriate authorization has been obtained.