Environmental Initial Study/
Draft Negative Declaration

EDCO Expansion Project
City of La Mesa, County of San Diego, California

January 2022

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CITY OF LA MESA
COMMUNITY DEVELOPMENT DEPARTMENT
DRAFT NEGATIVE DECLARATION

Project Title:	EDCO Expansion Project
Lead Agency Name and Address:	City of La Mesa Community Development Department 8130 Allison Avenue La Mesa, CA 91942
Contact Person and Phone Number:	Laura Traffenstedt Assistant Planner 619-667-1188
Project Location:	8184 Commercial Street La Mesa, CA 91942
La Mesa General Plan Land Use Designation:	City Public Use
Applicant Names and Addresses:	EDCO, Attn: Steve South 6670 Federal Boulevard Lemon Grove, CA 91945
Zoning:	M-D – Industrial Service and Manufacturing/ Urban Design Overlay
Assessor's Parcel Numbers:	464-600-07-00

Project Description:

The EDCO Material Recovery Facility and Transfer Station (Station) is a fully surfaced, existing solid waste facility, with some structures and a landscaped perimeter. It has been operating since 1999 under a City of La Mesa (City) March 25, 1997-approved Conditional Use Permit (CUP) # CP-06-96 for the operation of EDCO Station, with a permitted tonnage limit of 1,000 tons per day (tpd). EDCO is requesting an "expansion" of the facility. This includes both focused footprint effects, as well an expansion in daily tonnage treated.

Expansion is proposed due to continued growth in the region, including increased public disposal (self-haulers) and seasonal surges, which require an increase in tonnage capacity to a total of 2,000 tpd. Additionally, increased use of the facility has independently resulted from people being at home/telecommuting in greater numbers during the Coronavirus (COVID-19) pandemic. Pursuant to §17210.3 of the California Code of Regulations (CCR) Title 14, the Local Enforcement Agency (LEA) issued emergency waivers of terms and conditions of the EDCO Station Permit #37-AA-0922 during the declared State emergency. These waivers were issued for 120-day increments on March 26, 2020, July 24, 2020, November 18, 2020, February 25, 2021, June 15, 2021, and October 15, 2021, which allow the facility to operate at up to 2,000 tons per day; it has been operating at an average of 1,500 tpd. The Emergency Waivers have demonstrated that the facility can operate safely at these higher limits.

An Environmental Impact Report (EIR) was prepared and certified in 1997 for the La Mesa Materials Recovery and Transfer Station/Public Works Yard Project that evaluated construction and operation of the EDCO Station (State Clearinghouse # 96071012) at a maximum capacity of up to 4,224 tpd (City 1997). This document is referred to throughout this Initial Study/Negative Declaration (IS/ND) and is hereby incorporated by reference pursuant to CEQA Guidelines Section 15150.

Because design elements approved in the 1997-certified EIR allow for up to 4,224 tpd of load out capacity, no physical changes to the main building are necessary to accommodate the requested increase to a maximum of 2,000 tpd. However, an exit scale and scale house are proposed to be added, which comprises the only proposed change to facility footprint. The proposed exit scale/scale house would be for self-haulers who need to weigh out to conclude their transactions and would be located on the centerline west area of what is currently southbound Industrial Lane, retaining the current remaining lane. EDCO collection vehicles would bypass the proposed scale and scale house, exiting onto westbound Commercial Street. The new facilities would not require use of any public streets not already incorporated into Station function.

Routing some traffic to this locale would eliminate the need for these vehicles to return to the main scale house. Currently, this requires vehicles (approximately 70 per day) to re-enter the facility, which can lead to occasional traffic back up on Commercial Street. Installation of a second scale house would allow vehicles to be re-weighed on Industrial Way as they leave the facility rather than backtracking through the facility to the existing scale house at the Station entrance. It also would allow for all on-site traffic to follow a single directional pattern. The new weigh station would thereby improve circulation—allowing for adequate on-site queuing, offloading and efficient overall site circulation, as well as for maximum safety by separating commercial and public vehicles. EDCO would also take over maintenance of a portion of Industrial Lane, which would reduce the City's overall cost to serve the site.

Approximately 1,900 SF of existing paved area would be removed in the vicinity of the scale/scale house. A concrete pad would be installed to support the scale house, and a small (103 SF) pre-engineered metal building (PEMB) would be brought in by truck, unloaded, and secured to the concrete. The structure would be relatively square in shape, have a door and window, and a relatively flat roof. It would not exceed 12 feet 8 inches in height. The scale would consist of an approximately 70-foot-long steel platform truck scale with 15-foot-long concrete ramps on both sides of the platform.

Project construction would be completed within approximately 60 days.

Community Development Department Determination:

On the basis of the initial environmental study prepared for the proposal, it has been determined that the project would not have an adverse impact on the environment.

Community Development Department, City of La Mesa

12/23/2021
Date

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1. Project Title

   EDCO Expansion Project

2. Lead Agency Name and Address

   City of La Mesa Community Development Department
   8130 Allison Ave
   La Mesa, CA 91942

3. Contact Person and Phone Number

   Laura Traffenstedt
   Assistant Planner
   619-667-1188

4. Project Location

The EDCO facility is located at 8184 Commercial Street in the City of La Mesa (City), north of Commercial Street, east of the City Public Works Facility, and west of commercial uses. The focused location of structure improvement is on Industrial Lane, north of Commercial Street, and south of the primary processing structure (see Figure 1, *Regional Location*, Figure 2, *Site Location,* and Figure 3, *Aerial Photograph*).

5. Existing Setting

The site is currently improved with hardscape, processing structures, perimeter walls and fencing, and screening landscaping. The facility is owned and operated by EDCO Disposal Corporation and is located on land owned by the City. Existing on-site structures are permitted to reach up to 50 feet in height and include a 50,000-square foot (SF) Main Building, a 3,200-SF BuyBack Center and Office area, and a 1,672-SF covered Permanent Household Hazardous Waste Collection Facility (PHHWCF). Access to the site is via Interstate 8 (I-8), and then via Center Street and Commercial Street.

Surrounding land uses to the north include light rail/trolley tracks and right-of-way to the north (and commercial uses south of Fletcher Parkway north of that). Industrial/commercial uses are located to the east and south, including EDCO office and parking and storage uses south of Commercial Street from the Industry Lane exit (at 8173 Commercial Street). A City Public Works Facility is located to the west.

6. General Plan Designation/Zoning

EDCO Station has a General Plan designation of City Public Use and a zoning designation M-D (Industrial Service and Manufacturing/ Urban Design Overlay).

Surrounding designations include Regional Serving Commercial to the north, Commercial Light Industrial to the east and south, and City Public Works Facility to the west. Surrounding zoning designations are CM-F-D (Light Industrial and Commercial Service/ Floodway Overlay/Urban Design Overlay) to the north and M-D (Industrial Services and Manufacturing/Urban Design Overlay) to the east, south, and west.

7. Description of Project

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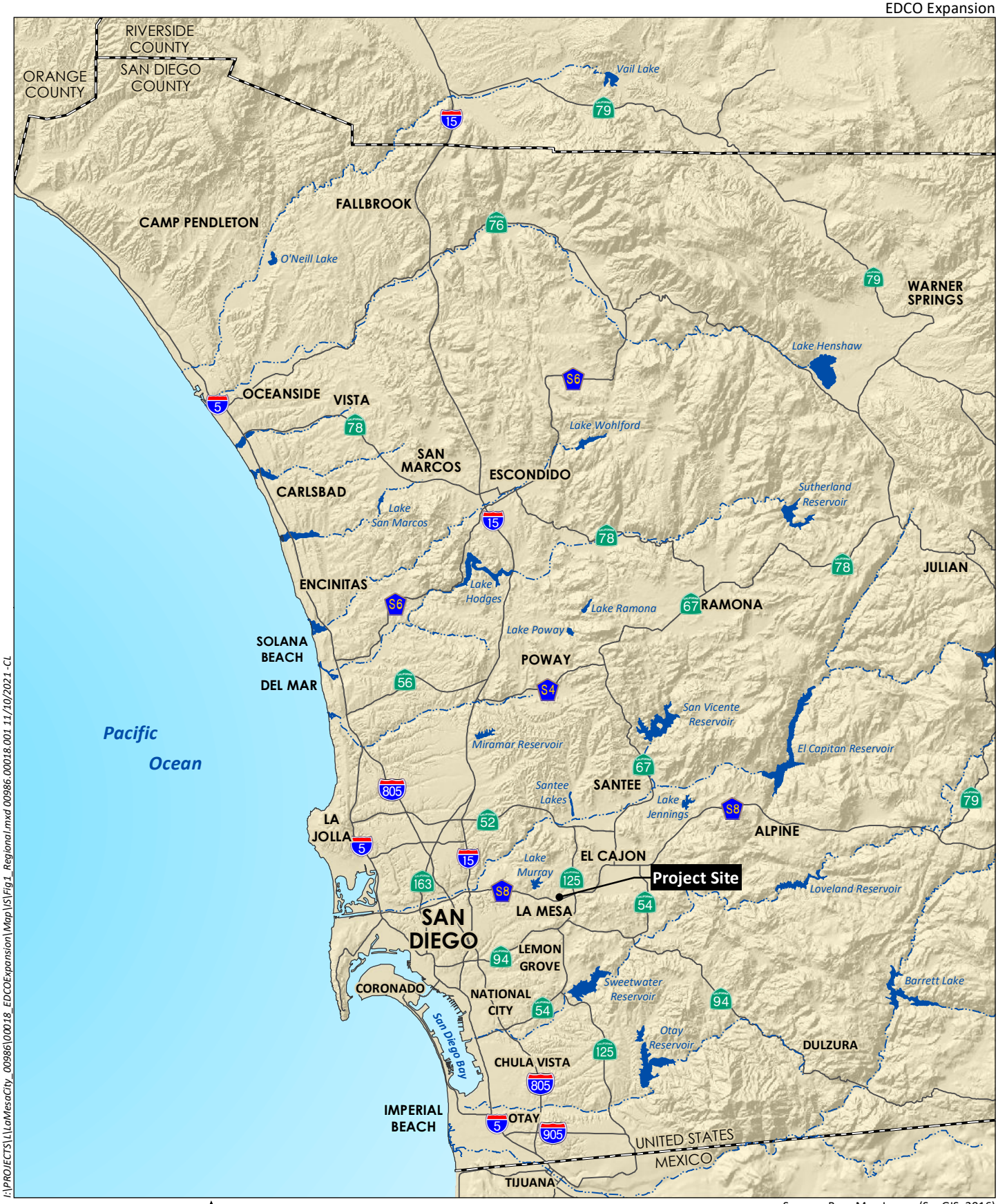

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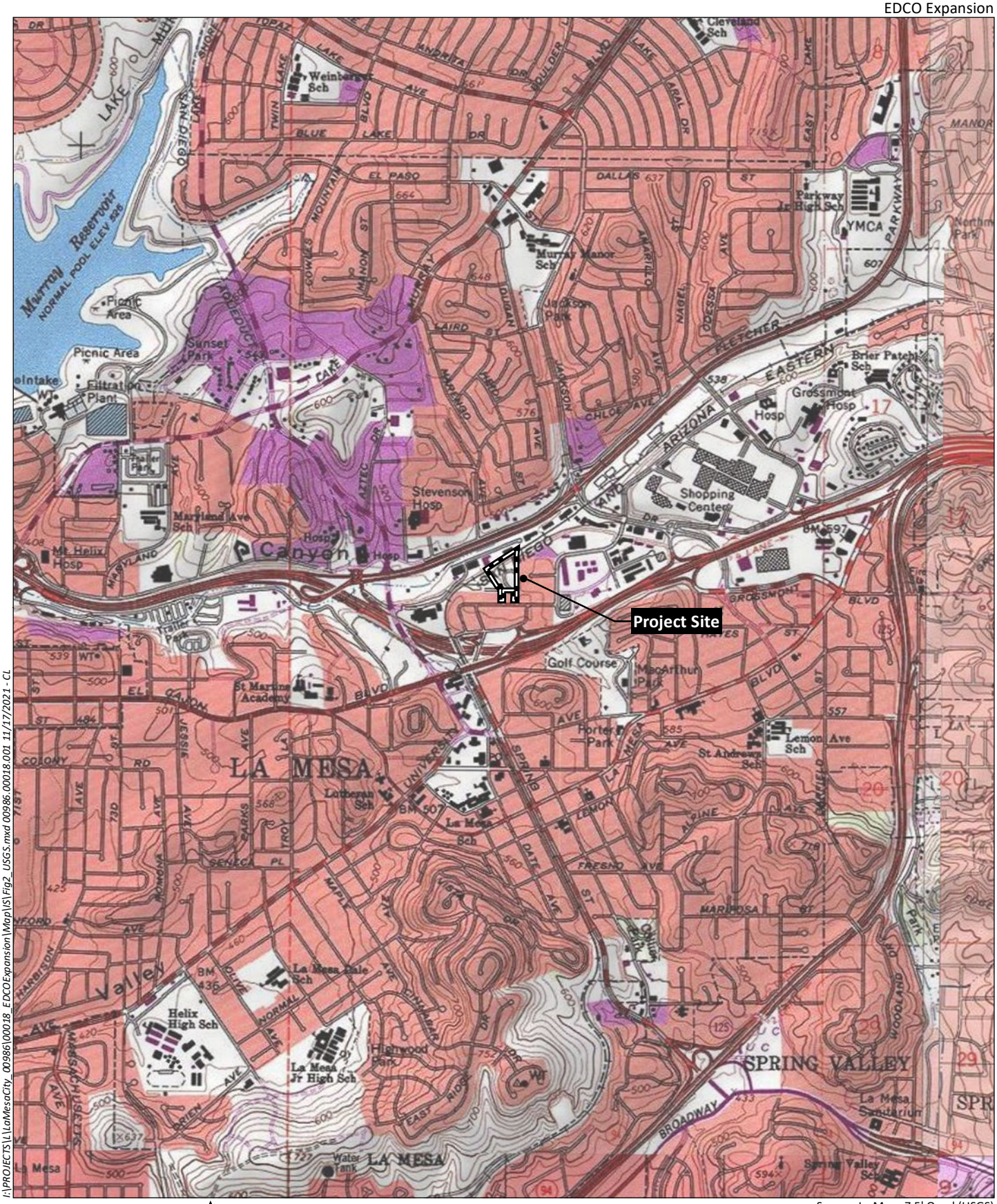
0 8 Miles

Source: Base Map Layers (SanGIS, 2016)

HELIX Environmental Planning

Regional Location

Figure 1



Source: La Mesa 7.5' Quad (USGS)

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Site Location

Figure 2

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0 500 Feet

Source: Aerial (SanGIS 2019)

HELIX Environmental Planning

Aerial Photograph

Figure 3

EDCO would also take over maintenance of a portion of Industrial Lane, which would reduce the City's overall cost to serve the site. Figure 4, *On-site Existing and Proposed Circulation*, depicts changes from existing vehicular patterns, and shows the location of the new scale and scale house on Industrial Lane.

Figure 5a, *Site Plan,* and Figure 5b, *Scale House and Scale*, provide a site plan and elevations of the scale and scale house. Approximately 1,900 SF of existing paved area would be removed in the vicinity of the scale/scale house. A concrete pad would be installed to support the scale house, and a small (103 SF) pre-engineered metal building (PEMB) would be brought in by truck, unloaded, and secured to the concrete. The structure would be relatively square in shape, have a door and window, and a flat roof. It would not exceed 12 feet 8 inches in height. The scale would consist of an approximately 70-foot-long steel platform truck scale with 15-foot-long concrete ramps on both sides of the platform.

Project construction would be completed in approximately 60 days.

These improvements would support City and State goals relative to increased landfill diversion and local and efficient long-term disposal in response to diversion mandates outlined in the California Integrated Waste Management Act of 1989 (AB 939), as well as goals to reduce air emissions, fuel consumption, and vehicle miles traveled. These latter benefits would be increased through additional consolidation of smaller loads into larger vehicles and provision of screening of waste for special handling in proximity to City residences and businesses resulting from the proposed project.

Absent the focused changes related to circulation and the scale facilities noted above, changes from existing conditions and procedures would not occur. The activities of the Station would continue to include the manual sorting and transfer of residential, commercial, and industrial refuse, transfer of self-haul public refuse, processing of materials collected by curbside recycling programs, a public drop-off area for recyclable materials, and a Permanent Household Hazardous Waste Collection Facility (PHHWCF). Once off-loaded inside the facility, waste is loaded into transfer trucks and transported to a permitted landfill. The off-loading of recyclables, storage of materials awaiting transfer, retention of 63 parking spaces (for employees, visitors, and handicapped spaces), overall site access, other on-site structures, utilities location and design (water, sewer, power), sign locations, fencing/walls along the site perimeter, and landscaping would all continue under current conditions.

Specific to types of materials accepted at the facility, again, no changes are proposed. Mixed municipal wastes (including residential and commercial/industrial wastes that do not require special handling) will continue to be accepted. These include:

- Residential and industrial/commercial generated, source-separated recyclable materials
- Non-hazardous industrial/construction/demolition wastes
- Organics, wood and yard wastes

Waste oil, anti-freeze, car and household batteries, paint products, household cleaning items, and yard and garden products may be accepted by appointment.

Similarly, the proposed Station expansion would not affect hours of operation. The facility would remain open seven days per week, with deliveries accepted during hours ranging from 5:00 a.m. to 6:00 p.m., however as needed, deliveries may be accepted outside of these hours.

Processing/maintenance occurs as needed round the clock, as shown below on Table 1, *Current Hours of Operation to Remain*.[1]

Table 1
CURRENT HOURS OF OPERATION TO REMAIN

Operation	Hours	Days
Refuse Receiving - Haulers	6:00 a.m. - 6:00 p.m.	Sunday - Saturday
Refuse Receiving - Public	5:00 a.m. - 1:00 p.m. 8:00 a.m. - 4:30 p.m.	Monday - Saturday Sunday
Internal Refuse Processing	Up to 24 hours	Sunday - Saturday
Refuse Transfer	Up to 24 hours	Sunday - Saturday
Buy-Back Center	10:00 a.m. - 4:00 p.m. 8:00 a.m. – 4:00 p.m.	Tuesday - Friday Saturday
Internal Maintenance	Up to 24 hours	Sunday - Saturday

8. Required Approvals

EDCO Station operation requires a Solid Waste Facility Permit (SWFP) from the LEA as designated by the City (here the County of San Diego Environmental Health Department [EHD]), with concurrence from the State Department of Resources Recycling and Recovery (Cal Recycle). The current and valid operating permit (37-AA-0922) is regulated by the LEA, which serves as the regional regulatory arm of Cal Recycle.

The LEA is responsible for the review, issuance of permits, and the monthly inspection of solid waste facilities under the SWFP process. In addition to the monthly inspections, once the SWFP is issued, the facility is also subject to a permit review every five years. Any violations of the SWFP or any of the permit conditions would be noted and citations issued. The LEA has the right to require modifications to the facility operation to remedy any identified problems and may revoke the SWFP if just cause is found. The LEA inspects for such conditions as noise, odor, dust, traffic, vectors, and hazardous materials.

Consistent with Article 3.1, Section 18201 of the CCR, in order to review a modification to an existing SWFP, the following must be completed and submitted:

- Transfer and Processing Report (TPR)
- Conformance with Land Use and/or Conditional Use Permits

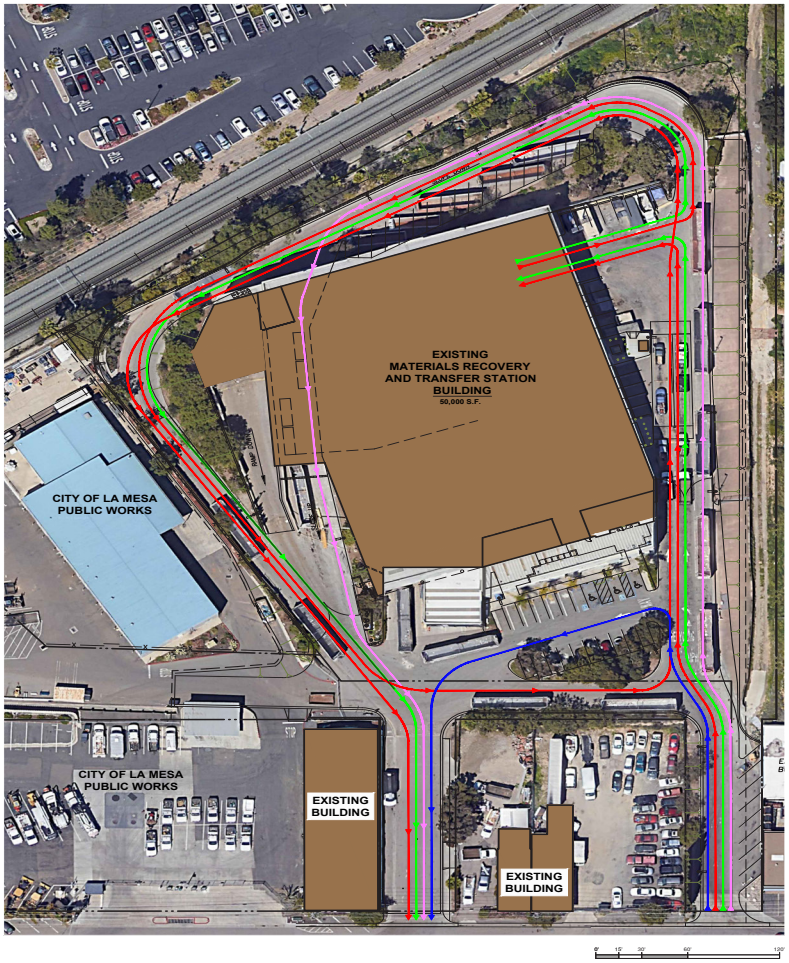
The TPR will be provided to the LEA in conjunction with the SWFP modification application, and land use conformance is addressed within this IS/ND.

The following City approvals would be required:

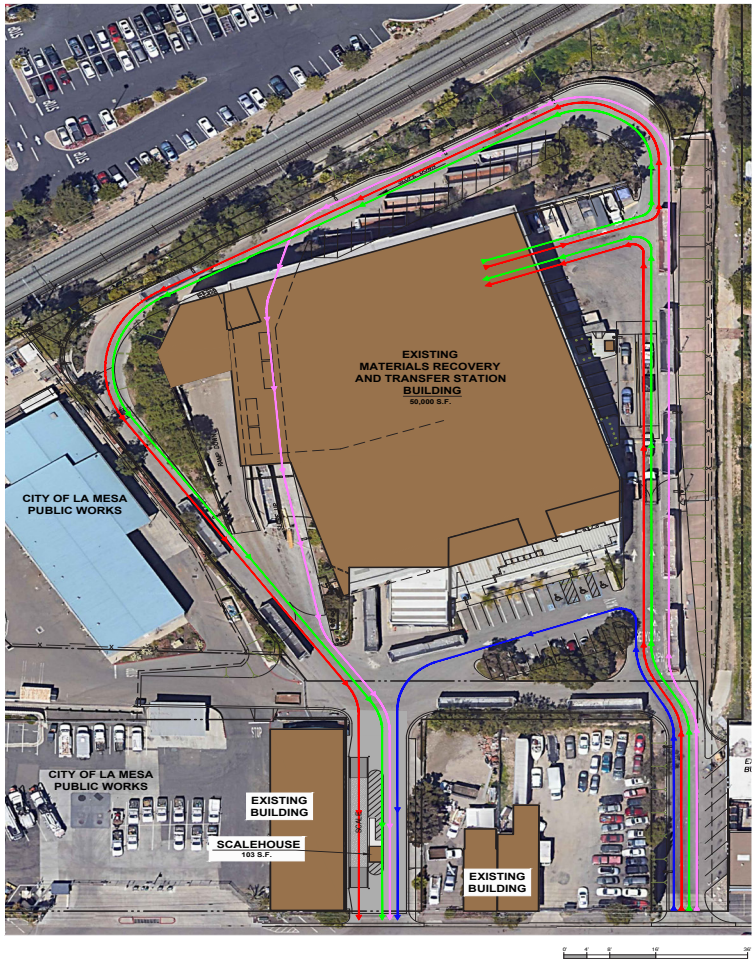
- Conditional Use Permit to allow continued function at a capacity of 2,000 tpd
- Encroachment Permit to allow installation of the scale house in public right-of-way
- Adoption of this IS/ND and a Mitigation Monitoring and Reporting Program
- Building Permit
- Grading Permit

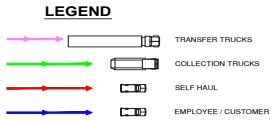
[1] Although not proposed as part of the current project, it is noted that hours of operation listed in Table 1 are based on business demands and are subject to change.

EXISTING



PROPOSED





Source: JRMA Architect Engineers (2021)

HELIX Environmental Planning

On-site Existing and Proposed Circulation

Figure 4

PROJECT INFORMATION

PROJECT NAME:	EDCO STATION
PROJECT ADDRESS:	8184 COMMERCIAL ST, LA MESA, CA
PROJECT DESCRIPTION:	MODIFY TONNAGE LIMIT OF EXISTING SOLID WASTE AND RECYCLING FACILITY. EDCO STATION IS AN EXISTING SOLID WASTE AND RECYCLING FACILITY OPENED IN 1999 THAT IS LIMITED TO A MAXIMUM OF 1,000 TONS PER DAY (TPD). DURING THE DECLARED STATE OF EMERGENCY FOR COVID, THE LEA GRANTED EMERGENCY WAIVERS ALLOWING THE FACILITY TO OPERATE AT UP TO 2,000 TPD FROM 3.26.21 THROUGH THIS FILING. THIS PROJECT IS TO ALLOW THE 2,000 TPD MAXIMUM AS THE NEW CAPACITY LIMIT AND ADD AN OUTBOUND SCALE AND SCALEHOUSE TO IMPROVE ON SITE CIRCULATION.
ASSESSOR'S PARCEL NUMBER (APN):	464-600-07-00
ZONING:	M-D (INDUSTRIAL SERVICE AND MANUFACTURING)-(URBAN DESIGN)
OCCUPANCY:	F-1
TYPE OF CONSTRUCTION:	II-N

LEGAL DESCRIPTION:

THE LAND REFERRED TO HEREIN IS SITUATED IN THE STATE OF CALIFORNIA, COUNTY OF SAN DIEGO, AND IS DESCRIBED AS FOLLOWS:

THAT PORTION OF LOT 2 OF LA MESA INDUSTRIAL CENTER ACCORDING TO MAP NO. 2505 AND A PORTION OF LOT 130 OF LA MESA COLONY ACCORDING TO MAP NO. 676 ALL IN THE CITY OF LA MESA, COUNTY OF SAN DIEGO, STATE OF CALIFORNIA AS PER MAPS FILED IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY, BEING DESCRIBED AS FOLLOWS:

COMMENCING AT THE SOUTHWEST CORNER OF SAID LOT 2; THENCE NORTH 89°57'15" EAST 35.00 FEET ALONG THE SOUTHERLY LINE OF SAID LOT 2 TO THE POINT OF BEGINNING; THENCE LEAVING THE SOUTHERLY LINE OF SAID LOT 2 ALONG A LINE THAT IS PARALLEL WITH AND 35.00 FEET EASTERLY OF THE WESTERLY LINE OF SAID LOT 2 NORTH 00°00'09" EAST 179.91 FEET; THENCE ALONG A LINE PARALLEL WITH AND 30.00 FEET NORTHERLY OF THE NORTHERLY LINEOF SAID MAP NO. 2503 SOUTH 89°58'47" WEST 135.17 FEET TO A POINT ON THE NORTHEASTERLY LINE OF THE LAND DESCRIBED IN ROADWAY DEDICATION FOR A PORTION OF INDUSTRIAL LANE ACCORDING TO CITY OF LA MESA RESOLUTION NO. 8792 FILED JULY 5, 1962 AT FILE/PAGE NO. 115910 IN THE OFFICE OF SAID COUNTY RECORDER, SAID POINT BEING ON AN NON TANGENT CURVE CONCAVE SOUTHWESTERLY HAVING A RADIUS OF 49.31 FEET A RADIAL BEARING TO SAID POINT BEARS NORTH 52°28'23" EAST; THENCE LEAVING SAID PARALLEL LINE ALONG THE NORTHEASTERLY AND NORTHERLY LINE OF SAID INDUSTRIAL LANE ALONG THE ARC OF SAID CURVE AN ARC DISTANCE OF 45.34 FEET THROUGH A CENTRAL ANGLE OF 50°21'19"; THENCE NORTH 87°52'56" WEST 41.20 FEET; THENCE LEAVING THE NORTHERLY LINE OF SAID INDUSTRIAL LANE NORTH 33°26'22" WEST 305.82 FEET TO THE SOUTHEASTERLY RIGHT OF WAY LINE OF SAN DIEGO AND ARIZONA EASTERN RAILWAY; THENCE ALONG SAID SOUTHEASTERLY LINE NORTH 56°55'44" EAST 556.25 FEET TO THE WESTERLY LINE OF MAP NO. 4793 ACCORDING TO MAP THEREOF ON FILE IN THE OFFICE OF SAID COUNTY RECORDER; THENCE LEAVING THE SOUTHEASTERLY LINE OF SAID RAILROAD RIGHT OF WAY SOUTH 00° 02'31" EAST 609.02 FEET ALONG THE WESTERLY LINE OF SAID MAP NO. 4793 TO THE NORTHERLY LINE OF AFORESAID MAP NO. 2503; THENCE SOUTH 89°27'52" WEST 9.28 FEET TO THE NORTHEAST CORNER OF SAID MAP NO. 2503; THENCE LEAVING SAID NORTHERLY LINE ALONG THE EASTERLY LINE OF SAID LOT 2 SOUTH 00°02'09" WEST 150.22 FEET TO THE SOUTHEAST CORNER OF SAID LOT 2; THENCE LEAVING SAID EASTERLY LINE ALONG THE SOUTHERLY LINE OF SAID LOT 2 SOUTH 89°57'15" WEST 14.66 FEET TO THE POINT OF BEGINNING.

SITE AREA CALCULATIONS:

SITE AREA:	196,290 SF	100%
BUILDING AREA:		
EXISTING BUILDING:	53,660 SF	
NEW SCALE HOUSE:	250 SF	
TOTAL:	54,110 SF	27%
LANDSCAPE AREA:	34,942 SF	21%
HARDSCAPE AREA:	102,313 SF	52%

PARKING CALCULATIONS:

	PROVIDED	% OF TOTAL
STANDARD HANDICAP PARKING:	2	3%
VAN ACCESSIBLE HANDICAP PARKING:	1	2%
STANDARD AUTOMOBILE PARKING:	52	80%
COMPACT PARKING:	9	15%
TOTAL PARKING PROVIDED:	64	100%

PROJECT TEAM

PROPERTY OWNER

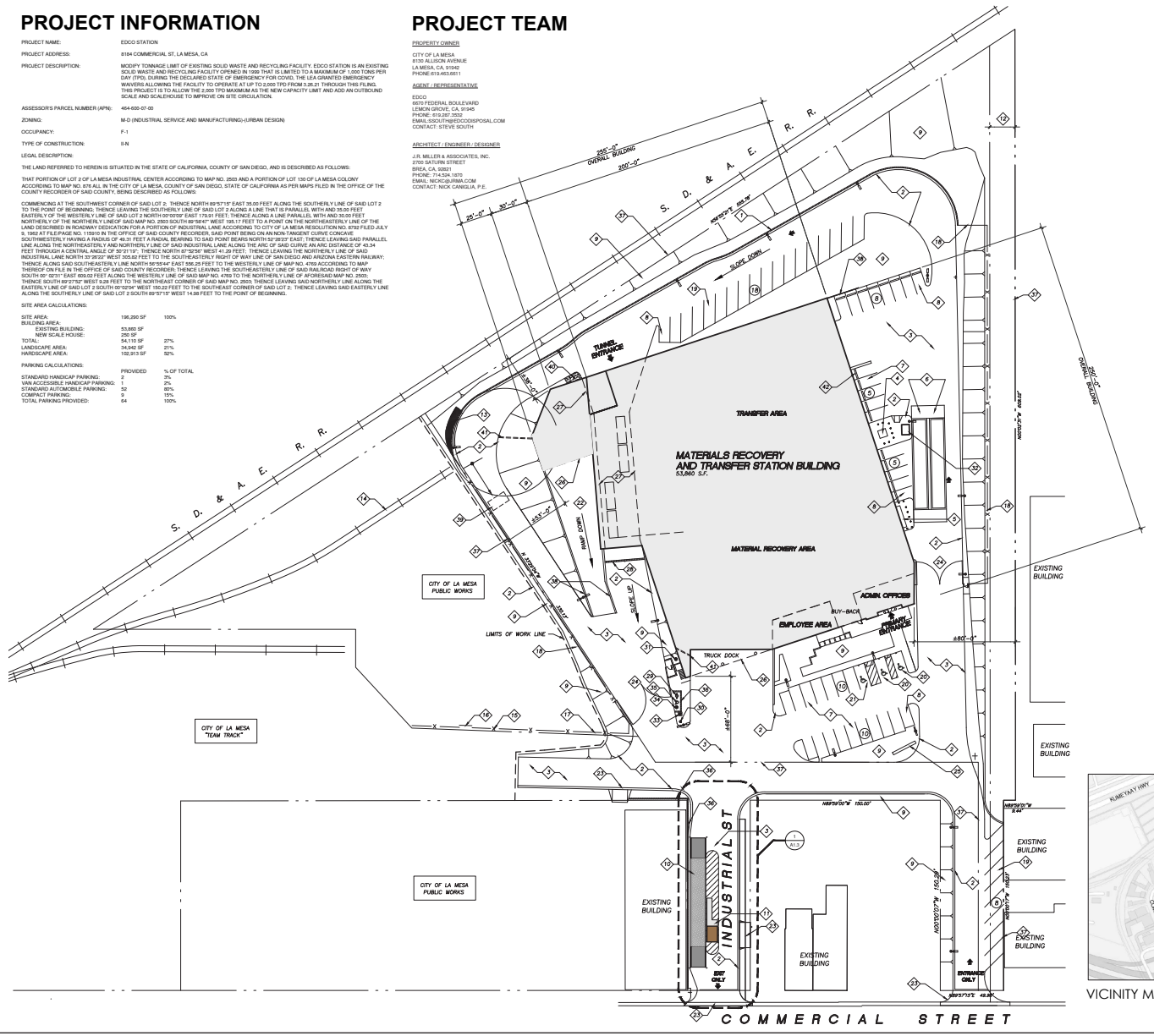
CITY OF LA MESA
8130 ALLISON AVENUE
LA MESA, CA, 91942
PHONE:619.463.6611

AGENT / REPRESENTATIVE

EDCO
6670 FEDERAL BOULEVARD
LEMON GROVE, CA, 91945
PHONE: 619.287.3532
EMAIL:SSOUTH@EDCODISPOSAL.COM
CONTACT: STEVE SOUTH

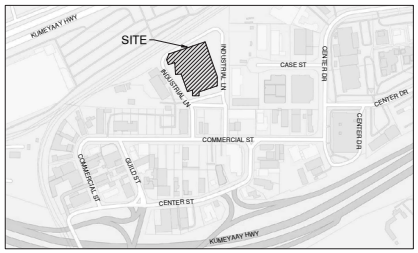
ARCHITECT / ENGINEER / DESIGNER

J.R. MILLER & ASSOCIATES, INC.
2700 SATURN STREET
BREA, CA, 92821
PHONE: 714.524.1870
EMAIL: NICKC@JRMA.COM
CONTACT: NICK CANGILIA, P.E.



KEYNOTES

1. 6' HIGH CMU BLOCK SCREEN WALL
2. CONC. CURB
3. PAVING
4. ELECTRICAL TRANSFORMER
5. ELECTRICAL SWITCHGEAR
6. EXISTING TRUCK SCALE
7. 9' X 19' STD. AUTOMOBILE PARKING STALL
8. 8' X 17' COMPACT AUTOMOBILE PARKING STALL
9. LANDSCAPING
10. PROPOSED SCALE
11. PROPOSED SCALE HOUSE
12. 20" HELIX WATER DISTRICT EASEMENT
13. STORM DRAIN AND CONTECH FILTERRA UNIT
14. RAIL SPUR
15. C.L. FENCE
16. GATE
17. NOT USED
18. 6' HIGH C.L. FENCE W/ BARBED WIRE
19. 9' X 20' STD. AUTOMOBILE PARKING STALL
20. 9' X 19' STD. HANDICAP PARKING STALL
21. 9' X 19' STD. VAN ACCESSIBLE HANDICAP PARKING STALL
22. CONC. RAMP
23. EXISTING CONC. DRIVE APPROACH
24. W.I. SWING GATES
25. MONUMENT SIGN
26. LINE OF ROOF OVERHANG ABOVE
27. OUTLINE OF RETAINING WALLS BELOW
28. TRENCH DRAIN
29. FIRE HYDRANT
30. WATER METER
31. FIRE SPRINKLER RISER
32. EXISTING SCALEHOUSE
33. LANDSCAPE IRRIGATION METER
34. P.I.V.
35. F.D.C.
36. RETAINING WALL
37. PROPERTY LINE
38. CONC. RETAINING WALL
39. CLARIFIER AND PUMP
40. 4" THICK CONCRETE SERVICE PAD
41. ROOF DRAIN AND OVERFLOW
42. CONCRETE WHEEL STOP (TYP.)



VICINITY MAP

Source: JRMA Architect Engineers (2021)

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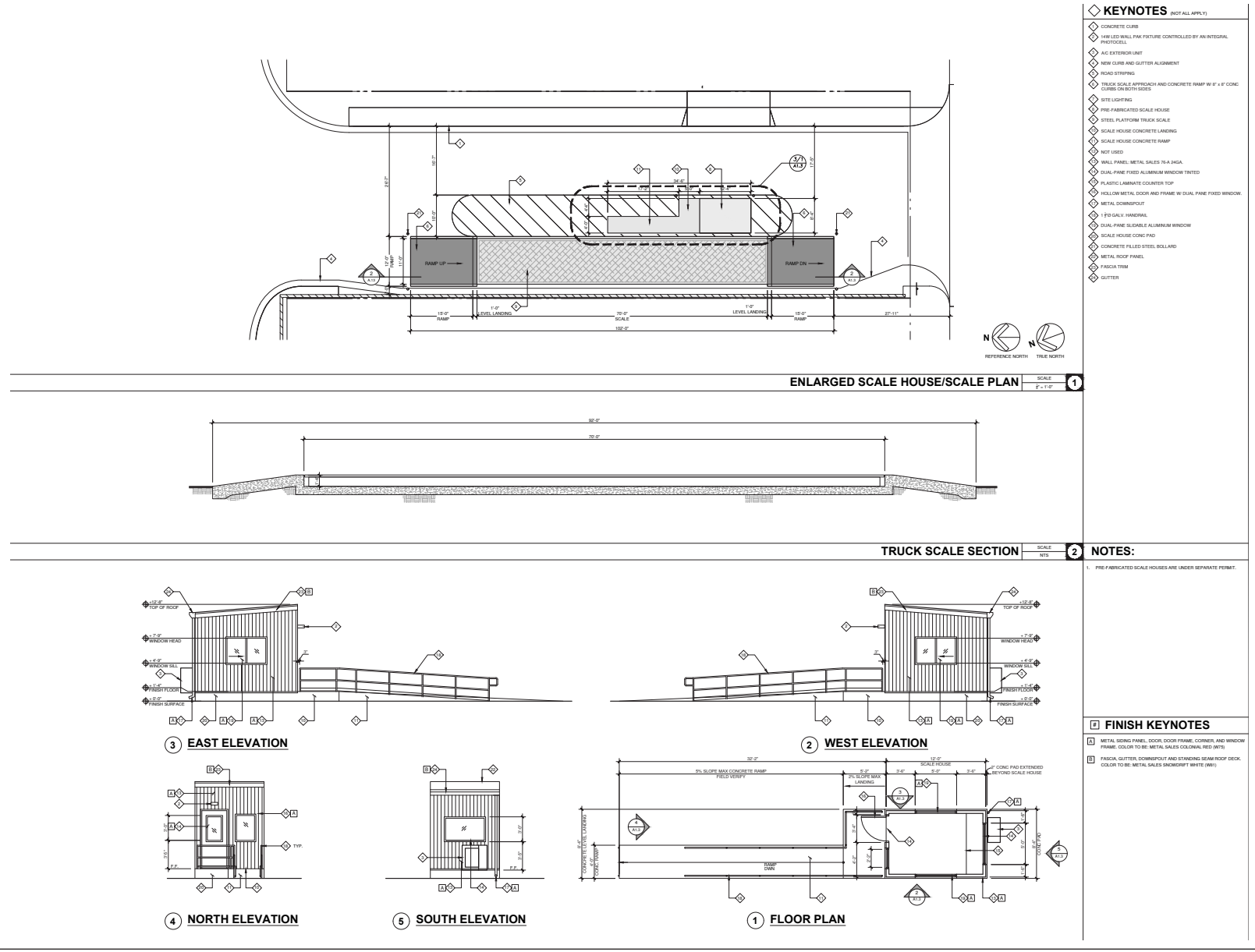
Site Plan

Figure 5a



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Source: JRMA Architect Engineers (2021)

HELIX Environmental Planning

Scale House and Scale

Figure 5b

This project would potentially affect the environmental factors checked, involving at least one impact that is a “Potentially Significant Impact” or is “Less than Significant with Mitigation Incorporated” as indicated by the checklist on the following pages.

☐ Aesthetics	☐ Agriculture and Forest Resources	☐ Air Quality
☐ Biological Resources	☐ Cultural Resources	☐ Energy
☐ Geology and Soils	☐ Greenhouse Gas Emissions	☐ Hazards and Hazardous Materials
☐ Hydrology / Water Quality	☐ Land Use / Planning	☐ Mineral Resources
☐ Noise	☐ Population / Housing	☐ Public Services
☐ Recreation	☐ Transportation	☐ Tribal Cultural Resources
☐ Utilities / Service Systems	☐ Wildfire	☐ Mandatory Findings of Significance

Determination

Based on this initial evaluation:

☒ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☐ I find 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.

☐ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find 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.

☐ I find 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.

Laura Traffenstedt
Signature

12/23/2021
Date

Laura Traffenstedt
Printed Name

Assistant Planner
Title

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 would 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, 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 15063I(3)(D). In this case, a brief discussion should identify the following:

    a) Earlier Analyses 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 which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

7. Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.

8. This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.

9. The explanation of each issue should identify:

    a) the significance criteria or threshold, if any, used to evaluate each question; and

    b) the mitigation measure identified, if any, to reduce the impact to less than significant.

Environmental Checklist

1. Aesthetics

		Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Except as provided in Public Resources Code Section 21099, would the project:					
a.	Have a substantial 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?	☐	☐	☐	☒
c.	In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☐	☒
d.	Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

a. The Land Use and Urban Design Element of the La Mesa General Plan identifies specific vistas that contribute to the City's community image. Vistas are described in the La Mesa General Plan as views with a narrow angle characterized by long vertically defined spaces that open to allow sight of a few select elements. The General Plan designates four vistas within the City: the view of Lake Murray from Baltimore Drive; the view from Fletcher Parkway near Baltimore Drive; and two views along La Mesa Boulevard in the Downtown Village. None of these views encompass or are adjacent to the EDCO site. The nearest designated vista to EDCO Station as identified on Figure LD-10, *Community Image*, of the City's General Plan Land Use and Urban Design Element (City 2012) is the view from just east of the Fletcher Parkway intersection with Baltimore Drive. This is approximately 0.25 mile from the EDCO Station, which is sited on the ridgeline above commercial structures in the valley. The built-up commercial/light industrial nature of the surrounding area overall precludes expansive views. Specific to this section of Fletcher Parkway, the project site is largely obscured from view by intervening and closer commercial uses. Even if the site was visible, the proposed changes would have no effect on the existing setting from this viewpoint as the large existing structure would intervene between the viewer and the proposed small scale house structure to the south. The project would not result in a substantial adverse effect on a scenic vista (no effect is identified), and no impacts would occur.

b. No designated scenic resources or scenic highways are present within or adjacent to the project site. The site is developed with storage and processing uses and does not contain any historic buildings, rock outcrops, or protected trees. The nearest designated scenic highway is a two-mile portion of State Route (SR) 125 as it transitions from SR 94 to I-8, approximately one mile easterly of the project site at its closest point. The project, therefore,

would not substantially damage scenic resources (would not impact them at all), including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway. No impacts to scenic resources would occur.

c. The 1997 certified Final EIR found beneficial impacts based on modifications to an already developed City works yard by the Station, that would remove older dilapidated buildings, incorporate specific additional notable bult uses, be consistent with and complement the urbanized area, and incorporate a landscaping plan. Buildout has been consistent with the overall design, and the current Station buffers facility operations from adjacent land uses through the use of solid walls and fences (at least six feet in height) around the property, as well as perimeter landscaping, with additional trees planted along the entrance, east, and north borders of the property.

The protection of scenic resources relevant to the project is guided by the La Mesa General Plan. The stated goal of the La Mesa Urban Design Program is to "Preserve and enhance the community character and sense of place by delivering projects and programs that build upon positive design features." Projects subject to design review include new or substantially renovated commercial properties, multi-unit residential developments, projects within the City's mixed-use corridors, and sites within the Downtown Village Specific Plan (DVSP) area. As an incremental physical expansion of an existing industrial facility outside of the DVSP, the EDCO expansion does not fall under the purview of the Urban Design program. It is noted, however, that General Plan Policy LU-4.2.1 focuses on "compatibility of the proposed development with surrounding uses and design objectives" and Policy LU-4.2.2 focuses on consistency of height limits for non-residential buildings with specified limits in each zone.

In this case, the scale and scale house would be visually compatible with other Station uses (rectilinear and industrial in nature), but also would be small in scale relative to those existing and abutting uses. The approved height of structures within the EDCP facility is up to 50 feet, and the approximately 100-SF scale house would fall below that height. It would be notably shorter than existing buildings on site and would not draw the eye from off-site. Construction would take place from the road centerline to the west. Existing vegetation on the east side of Industrial Lane would not be impacted.

Visibility to these modified features also is limited. Figure 6, *Views Toward Industrial Lane from Commercial Street*, depicts two views—from westbound Commercial Street just east of the Industrial Lane exit, and looking into the property from across Commercial Street (standing in front of the EDCO uses on the south side of the street). As shown, looking along Commercial Street, the primary view to the Station on the north consists of vegetated wall. The junction with Industrial Lane can be seen but is largely notable even from close to the turn by the sign prohibiting turns onto the lane. From across the street, the proximity to the structure to the west (left-hand side of the photograph) and the visually constrained nature of views on site given structures both to the west and east, is evident. While views onto the site generally would be fleeting from passing cars, they are illustrative. Currently, during some time periods, trucks can park along this lane. This would not be the case when the scale house and scale would take up through the center of the road, and the right-hand eastern side of the road would be used for exiting vehicles. The structure in the background could become incrementally more visible, as would the landscaping within the Station on the east side of Industrial Lane north of Commercial Street. Finally, as required and discussed further below in Item 1.d, project lighting would be directed downward onto the property and would not result in spillover onto adjacent properties, including Commercial Street.

Looking westerly toward the EDCO Station Industrial Lane exit onto Commercial Street.

Looking north onto EDCO Station Industrial Lane exit

Source: HELIX 2021

HELIX Environmental Planning

Views Toward Industrial Lane from Commercial Street

Figure 6

In conclusion, the project would expand upon existing uses on site, and would not conflict with applicable zoning and other regulations governing scenic quality. No impact is identified for this issue.

d. There are two primary sources of light associated with built uses: light emanating from building interiors (e.g., through windows or open doors) and light from exterior sources (e.g., street lighting, security/parking lot lighting, landscape lighting, etc.). The introduction of light can be a nuisance by affecting adjacent areas and diminishing the view of the clear sky depending on the location of the light sources and its proximity to nearby light-sensitive areas.

   The project site is in a developed commercial/industrial area surrounded with substantial existing nighttime lighting from nearby off-site existing light industrial, commercial/retail, and transportation facility land uses, as well as more distant residential uses.

   The new weigh-station building/scale could emanate some light during operations but would not be active when weighing operations would not be in action. Security lights are already present. As needed, any new lighting would be at a low level as possible, timed as appropriate, directed downward, and shielded to minimize spillover onto adjacent properties. Operations within the larger 4-acre site are already active 24 hours a day. Changes from the existing condition due to implementation of this very focused improvement are not expected to be notable from off site. Although focused new project lighting could produce light levels incrementally brighter than currently exists on the site, the net increase in nighttime lighting would not be considered substantial due to the developed nature of the site and surrounding area. Exterior lighting would continue to be subject to Section 24.06.030 of the City's Zoning Code, which requires lighting to be designed, installed, and maintained to prevent light spillover onto adjacent properties. Furthermore, the proposed building (as shown in Figure 5b) would not include large expanses of reflective material or surfaces such as glass. Therefore, the proposed project would not result in a significant impact related to new sources of substantial light and glare that would adversely affect day or nighttime views in the area. Impacts would be less than significant.

2. Agriculture and Forestry Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:				

		Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a.	Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non- agricultural use?	☐	☐	☐	☒
b.	Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c.	Conflict with existing zoning for or cause rezoning of forest land (as defined in Public Resources Code Section 12220(g)); timberland (as defined by Public Resources Code Section 4526); or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?	☐	☐	☐	☒
d.	Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e.	Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

a. A review of the California Department of Conservation (DOC) online California Important Farmland Finder Map query program designates the project site and surrounding area as Urban Built-Up Land. The Urban Built-Up Land designation applies to land that the DOC has identified as being used for a variety of urban uses and contains man-made structures or buildings under construction and the infrastructure required for development that are specifically designed to serve that land. No agricultural resources or operations are located within the vicinity of the project area. Therefore, the project would not convert farmland to non-agricultural use. No impact would occur for this issue.

b. The Williamson Act, also known as the California Land Conservation Act of 1965, is designed to prevent the premature and unnecessary conversion of open space lands and agricultural areas to urban uses. It enables local governments to enter into contracts with private landowners for the purpose of restricting specific parcels of land to agricultural or related open space use. In return, landowners receive lower property tax assessments because they are based upon farming and open space uses as opposed to full market value assuming highest use. The Williamson Act is only applicable to parcels within an established agricultural preserve consisting of at least 20 acres of Prime Farmland, or at least 40 acres of land not designated as Prime Farmland. As stated in Item 2.a, the project site is developed and currently in industrial use—neither farmland nor agricultural resources are present. The project site is currently zoned M (an industrial/manufacturing category) rather than for agricultural use. Additionally, it is not within an established agricultural preserve consisting of at least 20 acres of Prime Farmland or at least 40 acres of land not designated as Prime Farmland. As a result, the project would not conflict with existing zoning for agricultural use, or a Williamson Act contract. No impact is identified for this issue.

c. Public Resources Code Section 12220(g) defines "forest land" as land that can support 10 percent native cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits. There is no land zoned as forest land or timberland on site or in the immediate vicinity and there are no "natural conditions" as the site is fully developed. Therefore, the proposed project would not conflict with existing zoning for forest land or timberland, and no impact is identified for this issue.

d. Based on the definition of forest land provided in Item 2.c, above, no forest land occurs within or adjacent to the project site. Under "natural conditions," this site would be expected to contain scrub habitats. There are mature street trees comprising part of the EDCO Station landscaping along parcel boundaries, and there are trees associated with ornamental landscaping scattered throughout the greater project area; however, there is no concentration of trees that would constitute a forest. As a result, EDCO Station expansion could not result in the loss or conversion of forest land to non-forest. No impact is identified for this issue.

e. As stated in items 2.a and 2.d, above, implementation of the project would not result in the conversion of agricultural land to non-agricultural use or forest land to non-forest use. Therefore, no impact would occur for this issue.

3. Air Quality

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:				
a. Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
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?	☐	☐	☒	☐
c. Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

An Air Quality Analysis was prepared for the project, which is included as part of Appendix A to this IS/ND (HELIX 2021a). The results of this analysis are summarized in this section.

a. The San Diego Air Pollution Control District (SDAPCD) and San Diego Association of Governments (SANDAG) are responsible for developing and implementing the clean air

plan for attainment and maintenance of the ambient air quality standards in the San Diego Air Basin (SDAB). The regional air quality plan for San Diego County is SDAPCD's 2020 Plan for Attaining the National Ambient Air Quality Standards for Ozone in San Diego County (Attainment Plan; SDAPCD 2020). The Attainment Plan, which would be a revision to the state implementation plan (SIP), outlines SDAPCD's plans and control measures designed to attain the national ambient air quality standards (NAAQS) for ozone. These plans accommodate emissions from all sources, including natural sources, through implementation of control measures, where feasible, on stationary sources to attain the standards. Mobile sources are regulated by the United States Environmental Protection Agency (USEPA) and CARB, and the emissions and reduction strategies related to mobile sources are considered in the Attainment Plan and SIP.

The Attainment Plan relies on information from the California Air Resources Board (CARB) and SANDAG, including mobile and area source emissions, as well as information regarding projected growth in the County of San Diego, to project future emissions and then determine from that the strategies necessary for the reduction of emissions through regulatory controls. CARB mobile source emission projections and SANDAG growth projections are based on population and vehicle trends and land use plans developed by the cities and by the County. Projects which are consistent with the growth assumptions used in the Attainment Plan and do not conflict with the control measures in the Attainment Plan, and which do not result in criteria pollutant and precursor emissions in excess of the thresholds adopted by the County (as described below), would not hinder the goal of the Attainment Plan to bring the SDAB into compliance with the NAAQS and California ambient air quality standards (CAAQS) for the protection of public health.

The SIP relies on the same information from SANDAG to develop emission inventories and emission reduction strategies that are included in the attainment demonstration for the air basin.

Emissions reduction strategies include SDAPCD Rules such as identified below:

- Rule 50 (visible emissions) sets emission limits based on the apparent density or opacity of the emissions using the Ringelmann scale.

- Rule 51 (nuisance) states that a person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public or which endanger the comfort, repose, health, or safety of any such persons or the public or which cause or have a natural tendency to cause injury or damage to business or property.

- Rule 55 (fugitive dust control) requires action be taken to limit dust from construction and demolition activities from leaving the property line. Similar to Rule 50 (Visible Emissions), Rule 55 places limits on the amount of visible dust emissions in the atmosphere beyond the property line. It further stipulates that visible dust on roadways as a result of track-out/carry-out shall be minimized through implementation of control measures and removed at the conclusion of each workday using street sweepers.

A project would be inconsistent with the Attainment Plan if it is inconsistent with the population and employment growth assumptions within the General Plan or if the project's

emissions would exceed the applicable thresholds. As discussed in Item 3.b, below, construction or operation of the project would not result in pollutant emissions in excess of applicable thresholds. Because emissions would be below the applicable thresholds, and because the project would expand the permitted capacity for a solid waste transfer facility and would not result in notable population or employment increases (and may not result in any at all if the 16 new employees are residents of and currently working in La Mesa), the proposed project would not conflict with or obstruct implementation of the Attainment Plan for the SDAB. Impacts would be less than significant for this issue.

b. Criteria pollutant and precursor emissions resulting from construction of the EDCO Station and the renovation to the City Public Works Yard were analyzed in the 1997 EIR; those impacts were specific to construction of the EDCO Station and renovation of the City Public Works Yard. They have been completed and are not applicable to the project. Nonetheless, it is noted that the EIR identified significant impacts requiring mitigation for NO_X during the construction period. Mitigation measures were identified to reduce impacts to less than significant (City 1997, pp. 4.4-11 through 4.4-18).

   The EIR found that criteria pollutant and precursor emissions from mobile and stationary source operational emissions for the EDCO Station would not exceed the SDAPCD thresholds and the impact would be less than significant (City 1997, pp. 4.4-14 through 4.4-18). Similarly, emissions of odors and dust during operation of the EDCO facility were found to be less than significant based on adherence to State waste handling regulations, the distance to the closest residential areas, and implementation of proper operation and maintenance of the facility (City 1997, pp. 4.5-1 through 4.4-5).

   For the proposed action, the EDCO Station expansion would generate criteria pollutants and precursors in the short-term during the 60-day construction period, as well as during long-term operations. To determine whether a project would result in a cumulatively considerable net increase in criteria pollutants that would violate an air quality standard or contribute substantially to an existing or projected air quality violation, a project's emissions are evaluated based on the quantitative emission thresholds established by the SDAPCD, as shown in Table 2, *Screening-Level Thresholds for Air Quality Impact Analysis*.

Table 2
SCREENING-LEVEL THRESHOLDS FOR AIR QUALITY IMPACT ANALYSIS

Pollutant	Total Emissions		
Construction Emissions (Pounds/Day)			
Respirable Particulate Matter (PM_{10})	100		
Fine Particulate Matter ($PM_{2.5}$)	67		
Oxides of Nitrogen (NO_X)	250		
Oxides of Sulfur (SO_X)	250		
Carbon Monoxide (CO)	550		
Volatile Organic Compounds (VOCs)	137		
Operational Emissions			
	lbs. per Hour	**lbs. per Day**	**Tons per Year**
Respirable Particulate Matter (PM_{10})	---	100	15
Fine Particulate Matter ($PM_{2.5}$)	---	67	10
Oxides of Nitrogen (NO_X)	25	250	40
Oxides of Sulfur (SO_X)	25	250	40
Carbon Monoxide (CO)	100	550	100
Lead and Lead Compounds	---	3.2	0.6
Volatile Organic Compounds (VOC)	---	137	15
Toxic Air Contaminant Emissions			
Excess Cancer Risk	1 in 1 million 10 in 1 million with T-BACT		
Non-Cancer Hazard	1.0		

Source: HELIX 2021a; SDAPCD 2019
T-BACT = Toxics-Best Available Control Technology

Criteria pollutant and precursor emissions were calculated using the California Emissions Estimator Model (CalEEMod), Version 2020.4.0 CalEEMod is a computer model used to estimate air emissions resulting from land development projects throughout the state of California. CalEEMod was developed by the California Air Pollution Control Officers Association (CAPCOA) in collaboration with the California air quality management and pollution control districts, primarily the South Coast Air Quality Management District (SCAQMD). The calculation methodology, source of emission factors used, and default data is described in the CalEEMod User's Guide, and Appendices A, D, and E (CAPCOA 2021).

Construction activities during the 60-day construction period would include demolition of approximately 1,900 SF of asphalt, grading/excavation for the scale and scale house pad, installation of the scale and PEMB scale house, and pavement repair around the scale and scale house. Construction equipment assumptions were based on CalEEMod defaults and equipment used for past similar projects. The assumed equipment types and quantity used in the analysis is shown in Table 3, *Construction Equipment.*

Table 3
CONSTRUCTION EQUIPMENT

Activity	Equipment	Quantity
Demolition	Concrete/Industrial Saws	1
	Rubber-Tired Dozers	1
	Tractors/Loader/Backhoes	2
Grading	Excavators	1
	Rubber-Tired Dozers	1
	Tractors/Loader/Backhoes	1
Building Construction	Cranes	1
	Forklifts	1
	Tractors/Loader/Backhoes	1
Paving	Cement and Mortar Mixers	1
	Rollers	1
	Tractors/Loader/Backhoes	1

An estimated 1,900 SF of pavement (approximately 70 tons of old asphalt) would be removed and was included in the modeling as material export during demolition. The scale house would be prefabricated and would not require assembly or painting. Installation of the scale and scale house was assumed to require an average crew of five and an import of approximately 10 loads of concrete. Pavement repairs were assumed to require an import of two loads of aggregate/ asphalt. Construction emissions modeling assumes the implementation of standard dust control best management practices to meet the requirements of the SDAPCD Rule 55, including watering all exposed surfaces twice daily.

The potential increase in operational mobile emissions resulting from implementing the project were modeled based on the project trip generation analysis provided in the Transportation Impact Analysis (TIA, Appendix C to this IS/ND) which concluded that expanding the EDCO Station permitted waste processing from 1,000 tpd to 2,000 tpd would result in the following new trips: 36 average daily trips (ADT) from employees; 616 ADT from self-haul vehicles; 222 ADT from solid waste collection vehicles; and 92 ADT from solid waste transfer vehicles (Linscott, Law and Greenspan, Engineers [LLG] 2021). Employee vehicles were assumed to be a mix of light duty automobiles and light trucks, self-haul vehicles were assumed to be a mix of light and medium trucks (maximum two axles), and collection and transfer vehicles were assumed to be heavy trucks. The vehicle miles traveled (VMT) analysis in the TIA estimated that the average employee trip distance would be 12.4 miles. Because self-hauling and collection vehicles would travel to/from similar areas as project employees (the City and surrounding area), the trip distances for those vehicles would be similar to the employee trip distance. Transfer vehicles would primarily travel to the nearby active landfills, such as the Republic Services Sycamore Landfill and the Otay Landfill. All project trips were conservatively assumed to average the same distance as the employee trips (12.4 miles).

Construction Emissions

The project's construction emissions were estimated using equipment assumptions described above. The emissions generated from construction activities would include:

- Dust (including PM_{10} and $PM_{2.5}$) primarily from fugitive sources such as soil disturbance and vehicle travel over unpaved surfaces

- Combustion emissions of air pollutants (including VOC, NO_X, PM_{10}, $PM_{2.5}$, CO, and SO_X), primarily from: operation of heavy off-road equipment; on-road worker commute vehicle traveling to and from the project site; and trucks hauling equipment, material, and debris to and from the project site

- Emissions of VOCs from the application of asphalt.

The results of the calculations for project construction activities are shown in Table 4, *Maximum Daily Construction Emissions*. The data are presented as the maximum anticipated daily emissions for comparison with the SDAPCD thresholds. The model output is included in Attachment A to Appendix A. As shown, the project's construction emissions would not exceed SDAPCD thresholds and would not result in a cumulatively considerable net increase of any criteria pollutant.

Table 4
MAXIMUM DAILY CONSTRUCTION EMISSIONS

Construction Activity	VOC*	NO_X*	CO*	SO_X*	PM_{10}*	$PM_{2.5}$*
Demolition	0.8	7.0	7.9	<0.1	0.8	0.4
Grading	1.0	9.9	8.1	<0.1	2.8	1.6
Building Construction	0.5	4.8	4.4	<0.1	0.3	0.2
Paving	0.4	3.6	4.1	<0.1	0.3	0.2
Maximum Daily Emissions	**1.0**	**9.9**	**8.1**	**<0.1**	**2.8**	**1.6**
SDAPCD Thresholds	*137*	*250*	*550*	*250*	*100*	*67*
Exceed Thresholds?	***No***	***No***	***No***	***No***	***No***	***No***

Source: CalEEMod (output data is provided in Attachment A)
* Pollutant Emissions (pounds per day)
VOC = volatile organic compound; NO_X = nitrogen oxides; CO = carbon monoxide; SO_X = sulfur oxides; PM_{10} = particulate matter 10 microns or less in diameter; $PM_{2.5}$ = particulate matter 2.5 microns or less in diameter; SDAPCD = San Diego County Air Pollution Control District

Operations Emissions

Because EDCO Station was designed for a maximum capacity of 4,224 tpd of solid waste, increasing the permitted throughput to 2,000 tpd would not require a physical expansion of the processing facility or result in any additional on-site criteria pollutant and precursor emission compared to conditions prior to issuance of emergency waivers. The increase in operational mobile emissions related to additional VMT from employee, customer, and waste collection/transfer vehicle are compared to the SDAPCD thresholds in Table 5, *Operational Mobile Emissions*.

Table 5
OPERATIONAL MOBILE EMISSIONS

	VOC*	NO_X*	CO*	SO_X*	PM_{10}*	$PM_{2.5}$*
Maximum pounds per day	3.6	60.1	52.0	0.4	18.7	5.4
SDAPCD Daily Thresholds	*137*	*250*	*550*	*250*	*100*	*67*
Exceed Daily Thresholds?	***No***	***No***	***No***	***No***	***No***	***No***
Maximum tons per year	0.5	7.8	6.7	<0.1	2.4	0.7
SDAPCD Annual Thresholds	*15*	*40*	*100*	*40*	*15*	*10*
Exceed Annual Thresholds?	***No***	***No***	***No***	***No***	***No***	***No***

Source: CalEEMod (output data is provided in Attachment A)
* Pollutant Emissions (pounds per day)
VOC = volatile organic compound; NO_X = nitrogen oxides; CO = carbon monoxide; SO_X = sulfur oxides; PM_{10} = particulate matter 10 microns or less in diameter; $PM_{2.5}$ = particulate matter 2.5 microns or less in diameter; SDAPCD = San Diego County Air Pollution Control District

As shown in Table 5, mobile emissions resulting from increasing the EDCO Station permitted waste processing volume from 1,000 tpd to 2,000 tpd would not exceed the SDAPCD annual or daily screening-level threshold. Therefore, the project would not result in a cumulatively considerable net increase of any criteria pollutant. Impacts would be less than significant for this issue.

c. Land uses that are commonly considered sensitive receptors include residences, schools, hospitals, and daycare centers. The closest sensitive receptors to the project site are single-family residential buildings approximately 1,000 feet southeast of the project site and across I-8. Multi-family homes are located over 1,000 feet to the northwest, north of Fletcher Parkway. There are no schools, hospitals, or daycare facilities within 1,000 feet of the project site. The closest hospital (Sharp Grossmont) is approximately 0.9 mile to the east. Several schools are within 1.0 mile of the project site, including Christ Lutheran School (approximately 0.6 mile to the southwest), Lemon Avenue Elementary School (approximately 0.8 mile to the southeast), Murray Manor Elementary School (approximately 0.9 mile to the north), St. Martin of Tours Academy (approximately 0.6 mile to the southwest), Warren-Walker School/La Mesa (approximately 0.8 mile to the east), and East Region Community School of Greater La Mesa (approximately 0.3 mile to the east). Developed uses and roadways/freeways intervene between the project site and these schools. The closest daycare center is the Bunny Bears Preschool, approximately 1,300 feet (0.2 mile) to the northeast. The primary pollutants of concern for sensitive receptors are toxic air contaminants (TACs) and carbon monoxide (CO) hotspots.

Construction of the project would result in diesel particulate matter (DPM) from the operation of diesel-powered construction equipment. The amount to which the receptors could be exposed, which is a function of concentration and duration of exposure, is the primary factor used to determine health risk. Current models and methodologies for conducting cancer health risk assessments are associated with longer-term exposure periods (typically 30 years for individual residents) and are best suited for evaluation of long duration TAC emissions with predictable schedules and locations. These assessment models and methodologies do not correlate well with the temporary and highly variable nature of construction activities. Project construction is anticipated to last approximately two months. Of this period, only one to two weeks would involve intense use of off-road equipment (during demolition of pavement and grading). Due to the short construction schedule, and

the distance to the nearest sensitive receptors, construction of the project would not expose sensitive receptors to substantial pollutant concentrations.

The handling and transport of hazardous waste collected by the PHHWCF is regulated by CCR Title 22, Division 4.5, *Environmental Health Standards for the Management of Hazardous Waste*, as well as other State and federal regulations. Adherence to hazardous waste handling, transport, and disposal regulations would ensure sensitive receptors are not exposed to substantial concentrations TACs resulting from continued operation of the PHHWCF on the project site.

Project-generated traffic has the potential of contributing to localized concentrations of CO, or "CO hot spots." Because CO is a byproduct of incomplete combustion, exhaust emissions are worse when fossil-fueled vehicles are operated inefficiently, such as in stop-and-go traffic or through heavily congested intersections, where the level of service (LOS) is severely degraded. In accordance with the Transportation Project-Level Carbon Monoxide Protocol, CO hot spots are typically evaluated when: (a) the LOS of an intersection decreases to a LOS E or worse because of the project; (b) signalization and/or channelization is added to an intersection; and (c) sensitive receptors such as residences, schools, hospitals, etc., are located in the vicinity of the affected intersection or roadway segment (California Department of Transportation [Caltrans] 1998). According to the TIA, all of the analyzed intersections are forecast to operate at LOS D or better in the project opening year condition, without implementation of the project. Implementation of the project would not result in the LOS of any of the analyzed intersections degrading (LLG 2021). Therefore, consistent with the CO Protocol, operation of the project would not result in exposure of sensitive receptors to substantial localized CO concentrations.

Therefore, the project would not expose sensitive receptors to substantial pollutant concentrations, and impacts would be less than significant for this issue.

d. The State of California Health and Safety Code Sections 41700 and 41705, and SDAPCD Rule 51, prohibit emissions from any source whatsoever in such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to the public health or damage to property.

Facilities which handle solid waste, such as the EDCO Station, are a potential source of odors resulting from the decomposition of organic matter within the solid waste. Waste arriving at the EDCO Station is required by law to be covered or transported in enclosed vehicles. Waste is unloaded inside the enclosed processing structure. Nonrecyclable solid waste is compacted and transported off-site to the final disposal facility (e.g., landfill) within 48 hours, in accordance with State regulations for solid waste handling (CCR Title 14, Division 7, Chapter 3, Minimum Standards for Solid Waste Handling and Disposal) minimizing odors from the decomposition of organic matter during transport and on the project site. Implementation of the project would not result in new sources of odors or substantial changes to the intensity of existing odors in the project vicinity. In addition, as discussed above, the project site is located in an industrial/commercial area and the closest residential land uses are located approximately 930 feet from the project site. Therefore, the project would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people. Impacts would be less than significant for this issue.

4. Biological Resources

The 1997-certified EIR did not provide detailed analysis of biological resources. The site was already largely disturbed at that time as it was part of the City Public Works Yard and was being used as an open storage area adjacent to Public Works buildings. The section below addresses changes to the 2021 existing condition, which contains the current EDCO Station.

		Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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?	☐	☐	☐	☒
b.	Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
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?	☐	☐	☐	☒
d.	Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☐	☒
e.	Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☐	☒
f.	Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒

a. The project site is fully developed with structures or paving. Limited vegetation planted for screening purposes along site perimeter areas consists of non-native ornamental landscaping that does not provide suitable habitat to support candidate, sensitive, or special status species. None of the existing vegetation would be removed or impacted during the limited pavement removal along Industrial Lane and replacement with weigh station facilities. No impact is identified for this issue.

b. As noted in Item 4.a, the project site is fully developed. There is no riparian habitat or other sensitive vegetation community on site that is identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service. No impact would occur for this issue.

c. The project site is developed with structures and pavement and does not contain wetlands of any description. Site runoff is captured and treated, as described in Item 10.a of this IS/ND. As a result, the focused improvement area would not result in removal, filling, hydrological interruption, or other means of adverse impact to state or federal wetlands. No impact is identified for this issue.

d. Wildlife corridors usually consist of natural habitat areas that connect wildlife populations. The EDCO Station site is fenced and located in a developed area that lacks any of the features of a wildlife corridor and includes many hindrances, such as the site fencing, round-the-clock human activity, adjacent commercial and industrial uses, and an established and busy roadway network. Taken together, these preclude the area from being a corridor or migratory route. No impact would occur for this issue.

e. The project would impact some existing planting areas due to modifications of the curb cuts at the site entrances. Relative to trees on the east side of Industrial Lane, these also would not be impacted during construction. Activities would occur from the centerline west of the lane, as depicted in Figures 5 and 6. The project would not conflict with applicable goals, objectives, and policies within the General Plan Conservation and Sustainability Element or Recreation and Open Space Element, including Policy CS-1.1.3 (preserve existing trees where appropriate). As discussed in Items 4.a through 4.d, the project would not impact sensitive biological resources. Therefore, the proposed project would not conflict with local policies or ordinances protecting biological resources. No impact would occur for this issue.

f. The San Diego Multiple Species Conservation Plan (MSCP) is intended to provide for the protection and conservation of the region's sensitive plant and wildlife species habitat while continuing to allow appropriate levels of development and growth. As a planning tool, the MSCP protects the region's biodiversity while reducing conflicts between development interests and natural resources. The City of La Mesa Subarea Habitat Conservation Plan/Natural Community Conservation Plan (HCP/NCCP; City 1998) is a local habitat conservation plan prepared pursuant to the NCCP to supplement the MSCP. EDCO Station is located within the boundaries of the City of La Mesa Subarea HCP/NCCP, but not within or in the vicinity of areas designated as Multi-Habitat Planning Area, Core Biological Resource Areas and Linkages, or other preserve lands as identified in the Subarea HCP/NCCP. Based on HCP Figure 2 (Vegetation Communities for MSCP Study Area), it is located in an area identified as "Developed" north of I-8 and does not even contain/is not adjacent to even "Disturbed Habitat." The project site is not within a preserve or core biological area of the MSCP or contains species protected by any other approved local, regional, or state HCP. Therefore, no impact would occur for this issue.

5. Cultural Resources

		Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:					
a.	Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	☐	☐	☐	☒
b.	Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	☐	☒	☐
c.	Disturb any human remains, including those interred outside of dedicated cemeteries?	☐	☐	☒	☐

a. The EDCO Station site is fully developed with industrial uses and pavement. There is no potential for historic structures within the project site as the oldest structures were built post approval of the Station in 1997. As a result, the project would have no impact on built-environment historical resources.

b. The project primarily proposes an increase in materials processing. Ground disturbance would be restricted to the focused locale of the weigh station on (currently paved) Industrial Lane. Roadway construction requires excavation for base materials prior to paving of the surface, which would have resulted in ground disturbance/modification prior to facility opening in 1999. Due to the developed nature of the project site and minimal nature of proposed changes (removal of blacktop, pouring of a concrete pad, and installation of a prefabricated small structure), it is highly unlikely that construction activities would extend into previously undisturbed materials. Thus, the likelihood to encounter intact subsurface archaeological resources is very low. However, a possibility for buried, unknown archaeological resources to occur has been conservatively assessed. As a condition of approval, a note shall be placed on the building plans stating that should any archaeological (cultural) resources or human remains be discovered during construction-phase ground-disturbing activities, all work in the immediate vicinity must stop and the project applicant shall notify the City immediately. A qualified professional shall be retained to evaluate the finds and recommend appropriate action. With the inclusion of this condition of approval and the required regulatory compliance, impacts to archaeological resources would be less than significant.

c. Disturbance to human remains, including those interred outside of formal cemeteries is not anticipated given the developed nature of the project site and the extent of historic and modern development within the project area, as described above for Item 5.b. If human remains are discovered, California Health and Safety Code Section 7050.5 states that further disturbance and activities shall cease in any area or nearby area suspected to overlie remains and the County Coroner contacted. Pursuant to Public Resources Code (PRC) Section 5097.98, if the Coroner recognizes the remains to be Native American, the Coroner shall notify the Native American Heritage Commission, who would then notify the Most Likely Descendent. If Native American remains are discovered, the remains shall be kept *in situ*, or in a secure location in close proximity to where they were found, and the analysis of the remains shall only occur on-site in the presence of a Native American monitor. Further provisions of PRC Section 5097.98 are to be followed as applicable. Based on the existing

developed nature of the site, EDCO Station improvements are not expected to disturb any human remains. In the unlikely event that human remains are identified during additional surficial ground disturbance, mandatory compliance with existing codes would result in impacts being less than significant.

6. Energy

		Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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?	☐	☐	☒	☐
b.	Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☐	☒

An Energy Analysis was prepared for the project, which is included as part of Appendix A to this IS/ND (HELIX 2021a). The results of this analysis are summarized in this section.

a. The level of change to the existing facility would be small in both footprint and effect on energy use, for both construction and operational periods. Change would be incremental and the adverse versus beneficial effects may cancel each other out.

   Energy consumed for project construction would primarily consist of fuels in the form of diesel and gasoline. Fuel consumption would result from: the use of on-road trucks for the transportation of construction materials and water; construction worker vehicles traveling to and from the project site; and from the use of off-road construction equipment. While construction activities would consume petroleum-based fuels, consumption of such resources would be temporary and would cease upon the completion of construction. The petroleum consumed during project construction would be typical of similar industrial projects and would not require the use of new petroleum resources beyond those typically consumed in California annually for construction activities.

   Because the EDCO Station was designed for a maximum capacity of 4,224 tpd of solid waste, increasing the permitted throughput to 2,000 tpd would not require a physical expansion of the processing facility or result in significant additional on-site energy consumption compared to conditions prior to issuance of emergency waivers. Implementation of the project would result additional vehicles traveling to and from the project site. However, solid waste would be generated in the City and the surrounding area regardless of implementation of the project. Without the project, solid waste in excess of the EDCO Station permitted throughput would be collected and transported to other waste handling and/or disposal facilities, resulting in similar use of transportation fuels compared to implementation of the project, depending on where the waste would be hauled. Therefore, the project would not result in the wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation. The impact would be less than significant for this issue.

b. Several levels of government have implemented regulatory programs in response to reducing greenhouse gas emissions (GHG) emissions, which consequently serve to increase energy efficiency. Several state agencies, including CARB, California Energy Commission, California Public Utilities Commission, CalRecycle, California Department of Transportation (Caltrans), and the Department of Water Resources have developed regulatory and incentive programs that promote energy efficiency. Many of the measures are generally beyond the ability of any future development to implement and are implemented at the utility provider or the manufacturer level.

Locally, the City adopted its Climate Action Plan (CAP) in March 2018, which provides the framework for reducing the City's GHG emissions and consequently improving energy efficiency. Often local energy conservation plans and goals, such as those in the City's CAP are devised based upon the anticipated land uses within a planning area as outlined in planning documents including a City's General Plan or Zoning Ordinance. The project would not conflict with the General Plan or Zoning Ordinance land uses and is wholly consistent with existing on-site uses. Furthermore, because the project's long-term effects are limited to the expansion of the permitted throughput for the EDCO Station to meet existing solid waste and recycling collection demands, the project is not anticipated to result in a long-term increase in energy use in the state or region.

Thus, the project would not conflict with or obstruct a state or local plan for renewable energy efficiency. In fact, the improvements would augment efforts the City is already undertaking to reduce fuel consumption and road wear through reduction in vehicle miles driven as described in Item 17.b. The project would have no impact in relation to this issue.

7. Geology and Soils

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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?	☐	☐	☐	☒
ii. Strong seismic ground shaking?	☐	☐	☒	☐
iii. Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
iv. Landslides?	☐	☐	☒	☐
b. Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐

		Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
c.	Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	☐	☐	☒	☐
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?	☐	☐	☐	☒
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?	☐	☐	☐	☒
f.	Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☒	☐

a.i. Seismically induced surface or ground rupture occurs when movement on a fault deep within the earth breaks through to the surface as a result of seismic activity. Fault rupture almost always follows pre-existing faults, which are zones of weakness. Sudden displacements are more damaging to structures because they are accompanied by shaking. Under the Alquist-Priolo Earthquake Fault Zoning Act, the California State Geologist identifies areas in the State that are at risk from surface fault rupture (areas that are active or potentially active). The Alquist-Priolo Act's main purpose is to prevent the construction of buildings used for human occupancy on the surface trace of active faults; that requires the State Geologist to establish regulatory zones, known as Alquist-Priolo Earthquake Fault Zones, around the surface traces of active faults and to issue appropriate maps that identify these zones. As stated in the 1997 certified EIR, "no known or potentially active faults directly underlie the site or are located within approximately 10 miles of the site." The physical conditions, as they relate to earthquake faults, have not changed in the project area since the 1997 EIR. The project is not located within a designated Alquist-Priolo Earthquake Fault Zone. Thus, no impact would occur in relation to this issue.

a.ii. The closest notable fault to the project site is the Rose Canyon Fault, which is approximately 10 miles west of the site. Like most of southern California, the project site is susceptible to strong seismic shaking during an earthquake and can therefore be subject to strong seismic ground motion. The 1997 EIR found that a Richter magnitude 7.0 earthquake on the Rose Canyon Fault could cause significant damage to on-site structures, but that those impacts were "mitigable to levels below significance through adherence to standard seismic building codes" (City 1997:4.10-11). In this instance, the only structure in question is the weigh station house. This would be a pre-fabricated small structure (approximately 100 SF) that would be secured to the cement pad it sits on. The space is small and would not support many occupants at any one time. It also would be a place of business as opposed to a residence, with multiple hours of the day when it would be empty (as no trucks to be weighed would be coming through) based on Station activity hours. The securing of the structure to the pad combined with the low potential number of occupants and the restricted hours when they might be present, result in a less than

significant impact related to risk of loss, injury or death based on strong seismic ground shaking.

a.iii. Liquefaction is a soil phenomenon in which water-saturated soils lose strength (cohesion) when subject to the forces of intense and prolonged ground shaking and begin to act as a liquid rather than a solid. Liquefaction is more likely to occur in loose to moderately saturated soils with poor drainage, such as silty sands or sands and gravel containing impermeable sediments. The presence of a shallow groundwater table can also increase the susceptibility of liquefaction during seismic events. The 1997 EIR identified on-site fill soils as having potential for liquefaction. Those soils were identified for removal in order to implement development of the EDCO Station, with the resulting conclusion that liquefaction potential would be reduced to less than significant levels (City 9917:4.10-13). Underlying that fill was Stadium Conglomerate, a bedrock unit (City 1997: 4.10-4). Given the developed nature of the site, it is assumed that the fill soils were previously removed as needed to support paved roadway and liquefaction potential would remain less than significant.

a.iv. Landslides and slope instability were reviewed for the entire EDCO Station facility in the 1997 EIR. While potential was considered moderate due to mesa relief, “based on inherent stabilities of the underlying formation, no impacts associated with landsliding are anticipated” (City 1997:4.10-13). This is especially true for the location of the proposed improvements, which would be located at the southern extent of the property, farthest from the slope downward toward Fletcher Parkway. The conclusion remains the same; no impact is identified for potential substantial adverse effect, including risk of loss, injury, or death in project improvement areas based on landslide.

b. The improvement area is under asphalt, and it is assumed that topsoils would have been removed or covered during fill remediation noted in Item 7.a.iii, above. Specific to erosion, the improvement area is not within an area subject to natural drainage systems, is “flat” overall, and is wholly developed in hardscape. For the brief period that the existing asphalt is removed prior to installing weigh station improvements, if friable soil is exposed and wind or anticipated rain conditions could result in erosion, it would be watered or covered as part of standard construction procedure and compliance with local dust control measures as described in Item 3.a, above.

   Once constructed, the project site would no longer include exposed soil in the weigh area that would contribute to erosion and sedimentation. Therefore, the absence of topsoil issues, and the combination of a small development footprint, short construction period of 60 days, and lack of slope or runoff issues result in a less than significant impact related to a threshold of substantial soil erosion or loss of topsoils.

c. The project site is in an area that is flat, with little topographic variation in the immediate affected area. As discussed in Items 7.a.iii and 7.a.iv, above, impacts associated with liquefaction and landslides would be less than significant. With regard to other potential geologic instability hazards, placement of scale and associated scale house facilities onto Industrial Lane would not be expected to substantially affect subsurface soils such that soils would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse. Thus, the project would have less than significant impact for this issue.

d. As stated in the 1997 EIR, expansive soils can affect the integrity of overlying structure, foundations, and underground facilities. On-site soils are rated as having a high potential for expansive behavior (City 1997:4.10-7). The physical conditions, as they relate to on-site soils, have not changed in the project area since the 1997 EIR. The fact that proposed improvements would be sited in an area currently supporting a paved roadway indicates that any excavation and remediation that was previously identified as necessary has already taken place. Nonetheless, the City's Grading Ordinance would reduce hazards related to expansive soils. Specifically, the Grading Ordinance states, "The City Engineer shall not issue a grading permit in any case where the City Engineer finds that the work, as proposed by the applicant, will damage any private or public property, or interfere with any existing drainage course in a manner which may cause damage to any adjacent property, *or create an unreasonable hazard to person or property*" (emphasis added). Thus, with the required adherence to City Grading Ordinance, the project would have no impact for this issue.

e. The project does not involve the installation of septic tanks or alternative wastewater systems. Therefore, no impact would occur for this issue.

f. The improvement area for the project is entirely within the previously developed roadway. Due to the previous ground disturbance associated with roadway construction, as well as the relatively shallow excavation anticipated to support the weigh station and concrete pad under the scale house, it is unlikely that project construction activities would extend into previously undisturbed sensitive materials. If fill of any description underlies the road, there is zero potential for it to contain sensitive paleontological resources. The Stadium Conglomerate formation, however, underlies any fill soils on the site. This formation has a high potential to contain sensitive paleontological resources. Given the limited grading/excavation required for the scale and placement of scale house, it is very unlikely that construction activities would encroach into undisturbed portions of the underlying Stadium Conglomerate formation. Thus, the likelihood of encountering intact paleontological resources is extremely low to nonexistent. As a condition of approval, a note shall be placed on the building plans stating that should any paleontological resources be discovered during construction-phase ground-disturbing activities, all work in the immediate vicinity must stop and the project applicant shall notify the City immediately. A qualified professional shall be retained to evaluate the finds and recommend appropriate action. With the inclusion of this condition of approval and the required regulatory compliance, impacts to paleontological resources would be less than significant.

8. Greenhouse Gas Emissions

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

A Greenhouse Gas Emissions Analysis was prepared for the project, which is included as part of Appendix A to this IS/ND (HELIX 2021a). The results and conclusions of this analysis are summarized in this section.

a. Global climate change refers to changes in average climatic conditions on Earth, including temperature, wind patterns, precipitation, and storms. Global temperatures are moderated by atmospheric gases. These gases are commonly referred to as GHGs because they function like a greenhouse by letting sunlight in but preventing heat from escaping, thus warming the Earth's atmosphere. GHGs are emitted by natural processes and human (anthropogenic) activities. Anthropogenic GHG emissions are primarily associated with burning of fossil fuels during motorized transport; electricity generation; natural gas consumption; industrial activity; manufacturing; and other activities such as deforestation, agricultural activity, and solid waste decomposition.

   GHGs have long atmospheric lifetimes that range from one year to several thousand years. Long atmospheric lifetimes allow for GHG emissions to disperse around the globe. Because GHG emissions vary widely in the power of their climatic effects, climate scientists have established a unit called global warming potential (GWP). The GWP of a gas is a measure of both potency and lifespan in the atmosphere as compared to CO_2. For example, because methane and N_2O are approximately 25 and 298 times more powerful than CO_2, respectively, in their ability to trap heat in the atmosphere, they have GWPs of 25 and 298, respectively (CO_2 has a GWP of 1). CO_2e is a quantity that enables all GHG emissions to be considered as a group despite their varying GWP. The GWP of each GHG is multiplied by the prevalence of that gas to produce CO_2e.

   Because neither the City nor the SDAPCD have adopted quantitative thresholds related to GHG emissions from industrial projects, the quantitative analysis provided herein relies upon the SCAQMD adopted screening threshold for heavy industrial projects of 10,000 metric tons (MT) CO_2e (SCAQMD 2008). The SCAQMD's jurisdiction has similar climate and land use patterns as San Diego County (i.e., dense population centers and industrial areas to the west and along the coast, and rural, low population density areas to the east) and the relative mix of GHG sources in the two regions are similar.

   The project would generate GHG emissions during construction and operation of the project, as discussed below. It is noted, however, that facilities such as EDCO Station play a significant role in reducing both air emissions and vehicle miles traveled, primarily through the consolidation of loads. Benefits include, but are not limited to:

   - Reducing overall community truck traffic by consolidating smaller loads into larger vehicles.
   - Reducing air pollution, fuel consumption and road wear by consolidating loads into fewer vehicles.
   - Allowing for screening of waste for special handling.
   - Offering residents a convenient drop-off of waste and recyclables and reducing the overall impact of miles driven to a landfill through load consolidation.

   Project construction period and operation mobile GHG emissions were calculated using CalEEMod, as described for Item 3.a, above.

During construction of the scale and scale house, the use of off-road vehicles and equipment, and construction related on-road vehicles traveling to and from the project site, would result in emissions of GHGs from engine exhaust totaling 18.6 MT CO_2e. In accordance with SCAQMD recommendations, the construction period GHG emissions are amortized over the anticipated 30-year lifespan of the exit scale and scale house and added to the operational GHG emissions.

Increasing the permitted throughput of the EDCO Station from 1,000 tpd to 2,000 tpd would not require a physical expansion of the processing facility or result in any additional sources of GHG emissions, except for mobile emissions resulting from the additional on-road vehicle trips, described above. Solid waste would be generated in the City and the surrounding area regardless of implementation of the project. Without the project, solid waste in excess of the EDCO Station permitted throughput would be collected and transported to other waste handling and/or disposal facilities, resulting in similar or higher GHG emissions compared to implementation of the project, depending on where the waste would be hauled. However, to be conservative in accounting for GHG emissions in the City, this analysis assumes that all on-road trips (and the associated GHG emissions) resulting from implementation of the project would be new to the region. The calculated project operational mobile GHG emissions would be 4,618.2 MT CO_2e per year. With the addition of 0.6 MT CO_2e per year amortized construction emissions, the total project GHG emissions would be 4,618.8 MT CO_2e per year. This would not exceed the SCAQMD industrial source threshold of 10,000 MT CO_2e. Therefore, the project would not generate GHG emissions that may have a significant impact on the environment. The impact would be less than significant.

b. There are numerous State plans, policies, and regulations adopted for the purpose of reducing GHG emissions. The principal overall State plan and policy is Assembly Bill (AB) 32, the California Global Warming Solutions Act of 2006. The quantitative goal of AB 32 is to reduce GHG emissions to 1990 levels by 2020. SB 32 would require further reductions of 40 percent below 1990 levels by 2030. Because the project's operational year is post-2020, the project aims to reach the quantitative goals set by SB 32. Statewide plans and regulations such as GHG emissions standards for vehicles (AB 1493), the low carbon fuel standard (LCFS), and regulations requiring an increasing fraction of electricity to be generated from renewable sources are being implemented at the statewide level; as such, compliance at the project level is not addressed. Therefore, the proposed project would not conflict with those plans and regulations.

   The City's Climate Action Plan (CAP) was adopted in March 2018. The CAP describes the 2010 GHG emissions baseline and forecasted emissions for 2020 and 2035, and identifies achievable, measurable strategies and actions for the City to implement to reduce emissions to 15 percent below 2010 levels by 2020 and 53 percent below 2010 levels by 2035 (City 2018). These CAP reduction goals were designed to enable the City to meet the 2020 GHG reduction mandates of AB 32, the 2030 GHG reduction mandates SB 32, and to be on-track to meet the 2050 of EO-S-3-05 goal of GHG emissions 80 percent below 1990 levels by 2050. The CAP contains reduction measures within the City's direct influence to achieve the City's 2020 and 2035 GHG reduction targets in five strategy areas: energy; transportation and land use; water; solid waste; and green infrastructure (urban forest) (City 2018).

   By expanding the permitted capacity of the EDCO Station to meet existing solid waste and waste recycling demand, the project would support the City's CAP Solid Waste Strategy goals SW-3 (75 percent waste diversion) by providing local collection and separation of

household and commercial recyclable materials. The project would not conflict with any of the CAP's GHG reduction measures.

The transportation sector is the largest source of GHG emissions in the state and in the San Diego region. A project's GHG emissions from cars and light trucks are directly correlated to the project's VMT. The TIA (Appendix C to this IS/ND) analyzed the project's VMT and concluded VMT impacts would be less than significant (LLG 2021). Therefore, the project would not conflict with or obstruct the implementation of the SANDAG's Regional Plan (which includes climate change adaptation strategies).

As discussed in Item 8.a, above, without the project, solid waste in excess of the EDCO Station permitted throughput would be collected and transported to other waste handling and/or disposal facilities, resulting in similar or higher GHG emissions compared to implementation of the project. Therefore, although the project would result in 4,618 MT CO_2e per year from on-road vehicles, these emissions would not represent new or additional transportation sector emissions in the State's GHG emissions inventory. In addition, expanding the permitted capacity of the EDCO Station to meet existing demand would support the State's solid waste diversion goals and mandates. Thus, the project would not conflict with transportation and solid waste GHG emissions control measures contained in a state plan such as CARB's Climate Change Scoping Plan.

Therefore, the project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs, and the impact would be less than significant.

9. Hazards and Hazardous Materials

		Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:					
a.	Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
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?	☐	☐	☒	☐
c.	Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of 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 § 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☒	☐

		Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No 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?	☐	☐	☐	☒
f.	Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
g.	Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☐	☒

a. In overview, the transport, use, and disposal of hazardous materials and/or wastes would be conducted in accordance with applicable federal and state laws. The remainder of this discussion focuses on specifics particular to EDCO Station.

The EDCO expansion focuses on provision of a scale and scale house for the use of self-haul vehicles that need to document an empty weight in order to conclude their transaction. Following deposit of their materials, their actions would be to drive onto the scale, interact with the operator, conclude their transaction, and depart from Industrial Lane, turning westbound onto Commercial Street. Because the primary building for tipping, sorting and temporary storage was built to accommodate over 4,000 tpd, no changes would occur to locations or procedures based on the proposed increase in materials. As noted in Section 7, *Description of Project*, the facility is already operating safely under emergency permits allowing for up to 2,000 tpd, with an average of 1,500 tpd currently being safely handled. As a result, the principal changes from real existing conditions would consist of physical changes associated with the proposed project relative to internal traffic routing and weigh scales for empty trucks. Neither of these would have hazardous materials concerns. Regardless, the following is provided for information due to a permanent increase in tpd.

Materials and waste are generally considered hazardous if they are poisonous (toxicity), can be ignited by open flame (ignitability), corrode other materials (corrosivity), or react violently, explode, or generate vapors when mixed with water (reactivity). The term “hazardous material” is defined in the State Health and Safety Code (Chapter 6.95, Section 25501[o]) as any material that, because of quantity, concentration, or physical or chemical characteristics, poses a significant present or potential hazard to human health and safety or to the environment. Hazardous “waste” is defined as any hazardous material that is abandoned, discarded, or recycled, as defined in the State Health and Safety Code (Chapter 6.95, Section 25125). The transportation, use, and disposal of hazardous materials, as well as the potential releases of hazardous materials to the environment, are closely regulated through many state and federal laws.

Safe and sanitary storage and removal of solid waste is regulated by the California Integrated Waste Management Board (CIWMB) The CIWMB, in conjunction with local agencies, is responsible for promoting waste management practices aimed at reducing the amount of waste that is disposed in landfills. The CCR contains standards for storage,

collection, and removal of waste (Article 5 of Title 14), as well as standards for transfer and processing stations (Article 6 or Title 14). EDCO Station operation requires a SWFP from the LEA as designated by the City (County EHD), with concurrence from Cal Recycle. The current and valid operating permit (37-AA-0922) is regulated by the LEA, which serves as the regional regulatory arm of Cal Recycle.

The LEA is responsible for the review, issuance of permits, and the monthly inspection of solid waste facilities under the SWFP process. In addition to the monthly inspections, once the SWFP is issued, the facility is also subject to a permit review every five years. Any violations of the SWFP, or any of the permit conditions would be noted and citations issued. The LEA has the right to require modifications to the facility operation to remedy any identified problems and may revoke the SWFP if just cause if found. The LEA inspects for such conditions as noise, odor, dust, traffic, vectors, and hazardous materials.

Consistent with Article 3.1, Section 18201 of the CCR, in order to review a modification to an existing SWFP, the following must be completed and submitted:

- Transfer and Processing Report (TPR)
- Conformance with Land Use and/or Conditional Use Permits

The TPR will be submitted to the LEA project in conjunction with the SWFP modification application, and land use conformance is addressed in Item 7 of this IS/ND.

Specifically with regard to potential hazardous materials on site during operations, EDCO Station does not require use of hazardous materials. EDCO Station also does not accept high liquid content wastes (i.e., municipal sewage sludge or residues, or industrial wastewater sludge), designated wastes as defined by the RWQCB, or wastes requiring special handling, autoclaving, fixation, or solidification processes. The facility is not permitted to accept hazardous materials and is controlled through an on-site inspection program performed by the LEA, which is outlined in the CUP. All facility employees receive training in the identification of potentially hazardous substances.

The PHHWCF does receive materials by appointment including such items as: waste oil, car batteries, anti-freeze, paint, pesticides, and household cleaning items; however, and it is understood that small amounts of hazardous material could enter the facility as waste mixed with collected rubbish. In the event any hazardous materials enter the site accidentally, an on-site hazardous material response plan would be implemented. This plan has been included in the operational information submitted as part of the TPR and is required by the Hazardous Materials Management Division prior to the issuance of a SWFP permit to operate. The Hazardous Materials Plan includes emergency response procedures on how to safely store hazardous materials, evacuation procedures, a description of the employee training program, and safety measures. Potentially hazardous materials are temporarily stored in a permitted hazardous materials locker designed to properly segregate and secure hazardous substances. This secure locker will be approved by the Fire Department, and under State law, any material stored in the locker must be removed from the site within a 90-day period.

EDCO Station does, therefore, receive and store some hazardous materials in its business practice. As stated in the 1997 EIR:

> *In order to handle and store hazardous materials, the facility would be responsible for providing the necessary information required in the Hazardous Materials Business Plan. Business Plans contain basic information on the location, type, quantity, and health risks of hazardous materials stored, used, or disposed of at a facility. The Business Plan includes an inventory of hazardous materials onsite, an emergency response plan, and an employee training description. The information would be submitted to the County DEH to ensure completeness and accuracy* (City 1997:4.7-9).

The 1997 EIR reviewed both potential impacts to on-site workers, potential vectors (birds, insects, and rodents) as well as potential for release of hazardous waste from the facility due to a spill, chemical reaction, or fire. Mitigation measures including an Employee Safety Compliance Program, and Hazardous Material Training Plan were identified as requiring enforcement "throughout the life of the project, and the effectiveness of the programs shall be reviewed annually and updated accordingly" (City 1997:4.7-12). It was also required that a medical surveillance program would be incorporated into the Employee Safety Compliance Program, and that the applicant would provide programs/plans to DEH for review and approval, with plan updated completed when requested by the appropriate agency. Finally, prior to the initial Certificate of Occupancy, the applicant was required to submit documentation regarding implementation of safety programs and records verifying compliance, with annual updates required to appropriate agencies for review. These measures were identified as lowering potentially significant effects to a level of no impact in the 1997 EIR ("No residual public health and safety impacts would remain after implementation of the above measures" [City 1997:4.7-13]).

Given the required responsible agency monitoring, training and control plans and programs noted above, and ongoing updates as necessary, this is expected to continue for the incremental changes proposed as part of the expansion. Operations would not create a significant hazard to the public or the environment. Operational impacts associated with this issue would be less than significant.

During the project 60-day construction period, some limited amounts of hazardous substances used to maintain and operate construction equipment (such as fuel, lubricants, adhesives, and solvents) would be present. The small area of ground disturbance and presence of existing storm water system controls would keep potential impacts during the short construction period to less than significant.

b. As discussed in response to Item 9.a, above, any transport, use, or disposal of hazardous materials would be limited to typical equipment used during construction or routine operation subject to substantial regulations, controls, and periodic updates. Therefore, 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. Impacts would be less than significant for this issue.

c. There are no schools located within one-quarter mile of the project site. The nearest school is Bunny Bears Preschool, approximately 1,300 feet (0.2 mile) northeast of the project site. Based on the controls noted in the response to Item 9.a, as well as the distance from the school, impacts would be less than significant for this issue.

d. The 1997 EIR addressed potential hazardous materials on site prior to project implementation. Based on a 1996 geotechnical investigation prepared by Leighton & Associates, an underground storage tank (UST) had been removed from the site (unknown specific location). Previous uses at the site included a concrete batch plant and car wash, with some remnants of the batch plant (including an abandoned gasoline pump) having been noted in a 1987 Woodward-Clyde Report. Vehicles from the concrete plant also were maintained on site, with evidence of waste oil/fuels having been present. The site at that time also was being used for dumping and storage of construction materials such as old concrete, asphalt, and fill.

   The Leighton report documented excavation of 16 exploratory trenches on site, including areas previously used for the car wash drain area and the concrete batch plant. Samples from each trench were collected to determine presence of total petroleum hydrocarbons (TPH) and metals. Based on trenching locations as shown in Figure 4.8-1 (Site Assessment of Soil conditions at Project Site), neither of these areas was on or near Industrial Lane portions of the parcel. In addition, analyzed metals concentrations were “below the regulatory guidelines for classification of hazardous waste” (City 1997:4.8-7).

   Relative to risk of upset, the 1997 EIR considered the likelihood for significant impact low. In part, this was based on the types of adjacent uses (no residences, hospitals, schools, etc.) Additionally:

   > *…the volumes of household hazardous waste that may be encountered are likely to be small since household hazardous wastes are generally purchased and discarded in containers with less than 1-gallon capacity. Releases of small volumes would be easily mitigated before they could leave the property boundaries. A spill would most likely occur inside the facility during the sorting process, where it can be controlled and discharge prevented* (City 1997:4.8-13).

   A mitigation measure was identified to address contamination identified during site grading and utility installation. Those actions have been completed, and as noted elsewhere in this IS/ND, substantial new grading is not anticipated. In consideration of that, combined with the lack of identified problem areas near Industrial Lane when soils were visible, and the lack of metals concentrations needed to be classified as hazardous waste in the samples taken from 16 trenches, likelihood of issues related to hazardous material pre-existing the Station development is considered less than significant.

   Government Code 65962.5 stipulates that the Department of Toxic Substances Control (DTSC), the Department of Health Services (DHS), the State Water Resources Control Board (SWRCB), and any local enforcement agency, as designated by Section 18051, Title 14 of the CCR, identify and update annually a list of sites that have been reported to have certain types of contamination.

   The project site address was searched on the Facility and Manifest Database (HAZNET) maintained by the California Environmental Protection Agency (Cal EPA), NPDES, and the California Integrated Water Quality System Database (CIWQS) maintained by the State Water Resources Control Board. No record was found. The DTSC EnviroStor and SWRCB GeoTracker data bases were also checked. One record was found for 5200 Industrial Lane (the approximate location of the EDCO Station Transfer Building). It was noted as a leaking UST (LUST) cleanup that was completed and closed. No other on-site locales were noted. Overall, impacts associated with this issue would be less than significant.

e. The project area is located approximately 4.5 miles southwest of Gillespie Field Airport, approximately 7 miles southeast of the Montgomery Field Airport, and approximately 10 miles northeast of San Diego International Airport as measured off Google Earth. The project site is not located within the Airport Influence Area or within safety zones or noise contours of these airports, as defined in their Airport Land Use Compatibility Plans (San Diego County Regional Airport Authority 2014, 2010a, and 2010b, respectively). No impact is identified.

f. The project would require removal of approximately 1,900 SF of existing asphalt and the import and placement of weigh facilities and a small PEMB for the scale house. These trips are assumed to be easily accommodated within the traffic and vehicle types that already access this area and EDCO Station. As such, it is not anticipated that the construction-related vehicles would potentially affect emergency response in the area or emergency evacuation procedures in the event of an emergency (e.g., vehicles traveling behind the slow-moving truck). Nonetheless, if and as necessary, a traffic control plan would be prepared and approved by the City Engineer. This plan would include the appropriate measures to assure that emergency access and response procedures would not be hindered by the project. During operations, the project is required to adhere to the CBC, as encoded in the City's Municipal Code and the California Fire Code, both of which provide design standards to prevent the interference with emergency response plans. It is noted that the proposed improvements are anticipated to reduce existing intermittent periods of congestion in order for trucks to re-access the existing weigh station. This would be an improvement. Thus, impacts related to emergency evacuation and the implementation of an emergency response plan would be less than significant.

g. The California Department of Forestry and Fire Protection (CALFIRE) classifies lands in accordance with whether a very high fire hazard is present so that public officials are able to identify measures that will retard the rate of fire spread and reduce the intensity of uncontrolled fire through vegetation management and building standards. The designation of being within a very high or high fire severity hazard zone is based upon a combination of fuels, terrain, weather, and other relevant factors. According to the County of San Diego (2121) online Wildfire Hazard Map, the EDCO facility is in an area identified as "No Designation," i.e., it not classified as Very High, High, or even Moderate in terms of fire hazard severity zone. No impact is identified for this issue.

10. Hydrology and Water Quality

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☐	☒

		Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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 a substantial erosion or siltation on- or off-site;	☐	☐	☒	☐
	ii. substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	☐	☐	☒	☐
	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	☐	☐	☒	☐
	iv. impede or redirect flood flows?	☐	☐	☒	☐
d.	In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☐	☒
e.	Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐

a. The EDCO Station expansion would occur wholly within a site already developed to receive and process refuse and recyclables. As such, the full site is already subject to a surface drainage conveyance system. This system is controlled by paved concrete and asphalt directing surface waters to storm drains on the property and public streets. The on-site storm drains are outfitted with mesh filter systems engineered to capture and control foreign debris from entering the storm drains.

The storm drains are regularly maintained (e.g., cleaned out and serviced) to ensure no litter enters the drainage system. All refuse material handling is conducted within the fully enclosed transfer building, resulting in on-site materials being protected from contact during rain events.

The primary storm water system control is a Filtera bio filtration unit in the northwest corner of the property, which containers specialized media that removes pollutants such as sediment, oil, grease, and metals. The facility also utilizes a variety of best management practices (BMPs) and housekeeping, including daily hand sweeping, use of a regenerative street sweeper, and storm water media rolls to filter water prior to going to the Filtera units.

Impervious surfaces would not be increased as a result of the tpd increase and weigh station improvements, and it is not anticipated that improvements would introduce new sources of water pollutants in site runoff during long-term operations as the subject trucks are already using Industrial Lane. Rather, improvements would shorten time required for private haul vehicles to be on site and may incrementally reduce pollutants associated with those trucks.

There is the potential for water pollutants to be generated in the short-term during construction activities. Construction-related pollutants might include short-term periods of loose soils, liquid and solid construction materials and wastes, and accidental spills of concrete, fuels, and other materials. Standard construction BMPs would be implemented during the short 60-day construction period that would address erosion and sedimentation, as well as construction-related pollutants. The system would continue to capture and treat runoff through its existing water control and drainage systems. Based on the above considerations, the project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality. Impacts would be less than significant in relation to this issue.

b. Incrementally increased water demand is expected to occur due to the presence of additional staff on site and potential additional cleansing of work areas given additional tpd. This would be met through piped connections to the municipal water system supported by the Helix Water District and would not be drawn from groundwater. According to the District's 2020 Urban Water Management Plan Update (UWMP), less than one percent of the District's water supply comes from groundwater. Of that one percent, that supply comes from a single well that extracts from the San Diego River Valley Basin (Basin). There is no sustainable groundwater management act for the Basin; however, the Sustainable Groundwater Management Act of 2014 requires the Department of Water Resources to classify all basins in relation to the threat of overdraft (high, medium, and low priority). The Basin has been designated as a low priority with no restrictions on pumping (District 2021).

   The EDCO site does not include any groundwater extraction wells. Water to the site is provided through the municipal water system supported by the Helix Water District. No impact is identified for this issue.

c.i. The project site is on a fully developed lot in the midst of other developed lots within an area identified for industrial use. There are no on-site natural drainage courses and no nearby off-site drainage courses that would be altered by the project. The proposed scale improvements would replace existing asphalt with new impervious surfaces. Substantial on-site erosion would not occur from these facilities. Similarly, the fact that they would be within existing Station activity areas and subject to an existing drainage collection system would eliminate potential for off-site erosion.

   As discussed in Item 7.a, the project would implement standard construction BMPs to address siltation and erosion during project construction. In addition, the project would be required to adhere to the City's Storm Water Ordinance that is codified in the City's Municipal Code Chapter 7.18. In part, this Ordinance would require that the project comply with the City's Standard Urban Storm Water Mitigation Plan (SUSMP), that provides operational storm water discharge and conveyance regulations. The SUSMP contains BMPs that serve two overarching goals: (1) to provide effective means to prohibit non storm water discharges; and (2) reduce the discharge of pollutants from storm water conveyance systems to the maximum extent practicable during construction and throughout the use of a developed site. Impacts would be less than significant.

c.ii. As stated in Item 10.c.i, the proposed scale improvements would replace existing asphalt with new impervious surfaces. No substantial change to the rate or amount of site runoff would occur. The existing storm drain system would adequately collect, convey, and discharge on-site runoff and would not result in flooding of the site or surrounding properties

during storm events. Therefore, the project would have a less than significant impact for this issue.

c.iii. Please refer to Item 10.c.ii. No substantial change to rate and amount of on-site runoff would occur. Pollutants resulting from vehicle passage along the roadway are part of the existing condition as Industrial Lane provides the exit from EDCO Station. Therefore, as a result of minimal potential change combined with the existing stormwater collection system, the improvements would neither exceed the capacity of the drainage system nor provide a substantial additional source of polluted runoff. Impacts would be less than significant for this issue.

c.iv. The 1997 EIR noted that the Station location is not identified in the City's General Plan Safety Element as being within an area of potential flooding, and also stated that the site's location at the top of a mesa and the elevation above Alvarado Creek rendered the potential for flooding as nonexistent (City 1997:4.9-3). The physical conditions, as they relate to flooding, have not changed in the project area since the 1997 EIR. Therefore, proposed project improvements would not impede or redirect flood flows. Impacts would be less than significant for this issue.

d. Please refer to Item 10.c.iv. The project site is in an area of minimal flood hazard and is not in a mapped floodplain or flood hazard zone (FEMA 2021). An event associated with a tsunami would occur as a result of an oceanic disturbance; likewise, a seiche event would occur if there was a disturbance to an inland body of water. The project site is located over 10 miles from the Pacific Ocean and approximately 1.25 miles from Lake Murray, which has a surface elevation approximately 140 feet below EDCO Station and a general flood path moving toward the ocean. Therefore, given distance and topography, it is highly unlikely that the project site would experience inundation from either a tsunami or seiche and thus would not release pollutants due to inundation. No impact would occur for this issue.

e. The project site is located within the regulatory boundaries of the San Diego RWQCB. The San Diego RWQCB is responsible for the adoption and implementation of water quality control plans, issuance of discharge permits, and performance of other functions in relation to regulating the region's water quality. Issues identified in the 1997 EIR for this issue included potential for erosion during construction on the larger site edging the valley to the north, and addition of impervious surfaces. The current level of development, continuation of existing impervious surfaces, and the drainage system installed for the Station overall as part of earlier actions substantially minimize or eliminate these concerns. Proposed improvements would not conflict with or obstruct the RWQCB Basin Plan.

With regard to sustainable groundwater management, please see Item 7.b. In addition, the project site is located within the larger Basin that is comprised of four contiguous sub-basins. The Basin has multiple users, is not adjudicated, and currently does not have an overall groundwater basin management plan. To comply with the Sustainable Groundwater Management Act and the California Statewide Groundwater Elevation Monitoring Program, in 2015, several local jurisdictions and water agencies formed a cooperative to monitor groundwater. Currently, the Basin is not exhibiting signs of overdraft or being at risk of overdraft. Impacts would be less than significant in relation to this issue.

11. Land Use and Planning

		Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:					
a.	Physically divide an 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?	☐	☐	☒	☐

a. The physical division of an established community typically refers to the construction of a linear feature (e.g., a highway or railroad tracks), or the removal of a means of access (e.g., local road or bridge) that would impede movement within an existing community or between a community and outlying area. The current project would not change any circulation or access patterns between community inhabitants and desired services or locations. Rather, it would continue to operate within an existing solid waste facility site in an area characterized as developed/urban and designated by the General Plan as City Public Use and zoned as M-D (Industrial Service and Manufacturing/Urban Design Overlay). The proposed project would be consistent with these designations. Therefore, the proposed project would not physically divide an established community. No impact would occur for this issue.

b. Proposed improvements are industrial in nature, would be located within the industrial area of the City, would be internal to EDCO Station, and would be wholly compatible with the existing EDCO Station's facilities. The improvements are consistent with both the existing zoning and land use designation.

   The facility and the proposed project would be directly responsive to the City's General Plan Objective LU-3.2, supporting an industrial employment center attractive to customers from both local neighborhoods and regional communities.

   General Plan Policy LU-4.2.2 addresses height limits for non-residential buildings and notes that approval of a Special Permit may allow a building to exceed the specified height limit on a site-by-site basis. In this case, the new scale house height of 12 foot 8 inches would be well below the maximum allowable height on site (50 feet) and therefore would not require a Special Permit.

   General Plan Policy LU-4.2.3 focuses on adequate parking for new development. In this case, the improvements do not constitute new development so much as modifications to an existing use. Nonetheless, it is noted that the original project required 26 employee and 11 visitor parking spaces, as well as handicapped and van accessible spaces for a facility treating 1,000 tpd. At this point, EDCO Station has 63 parking spaces, which would continue to accommodate operations with the proposed improvements.

   As discussed above and elsewhere in this IS/ND, the project would be consistent with the General Plan Land Use and Urban Design Element (City 2012), does not conflict with policies regarding scenic resources, does not contain any open space or conservation

resources subject to goals and policies of the City's General Plan Conservation and Sustainability Element (City 2012), and is not designated as a preserve or conservation area within an HCP/NCCP or other conservation plans. Further, the project site does not contain any historic or known archaeological resources (refer to Section 5, Cultural Resources), and there are no goals or policies in the City's General Plan Historic Preservation Element that are pertinent to the project. The proposed project would be adequately served by existing public services (i.e., police and fire protection) and would require compliance with the City's building and fire codes. No inconsistencies with the City's Public Services and Facilities, Safety, or Health and Wellness Elements (City 2012) are anticipated because of project implementation. As discussed in Item 17.a, the proposed project would not adversely affect with the City's General Plan Circulation Element.

The goal of the Noise Element of the La Mesa General Plan (City 2012) is to minimize the impact of noise on the community by identifying existing and potential noise sources and providing the policies and standards needed to keep noise from reducing the quality of life in La Mesa. The General Plan Noise Element establishes guidelines to evaluate the compatibility of land uses and noise exposure levels. Table 6, *Land Use/Noise Compatibility Guidelines*, summarizes the City's exterior land use-noise compatibility guidelines. Shading in this table represents the maximum noise exposure level considered compatible for each land use category. The goal for maximum outdoor noise levels in commercial areas is 70 CNEL (north of EDCO Station) and industrial/manufacturing areas are 75 CNEL. The construction activities associated with the proposed project would occur in an industrial/manufacturing area. These CNEL levels are intended to guide the design and location of future development and serve as a target for the reduction of noise in existing development.

Table 6
EXTERIOR LAND USE/NOISE COMPATIBILITY GUIDELINES

Land Use Category	55*	60*	65*	70*	75*
Residential – Low Density Single Family, Duplex, and Mobile homes					
Residential – Multiple Family					
Transient Lodging – Motels, Hotels					
Schools, Libraries, Churches, Hospitals, and Nursing Homes					
Auditoriums, Concert Halls, Amphitheaters					
Sports Arena, Outdoor Spectator Sports					
Playgrounds, Neighborhood Parks					
Golf Courses, Riding Stables, Water Recreation, Cemeteries					
Offices Buildings, Business, Commercial, and Professional					
Industrial, Manufacturing, Utilities, Agriculture					

Source: City 2012
Notes: Shading represents the maximum noise exposure level considered normally acceptable for each land use category.
*Annual CNEL (dBA)

Similarly, the La Mesa Municipal Code Chapter 10.80, Noise Regulation, prohibits unnecessary, excessive, and annoying noises in the City. Section 10.80.040 establishes noise limits for on-site generated noise at adjacent properties and is based on zone or land use designation. The noise limits for each zone classification are summarized in Table 7, *La Mesa Municipal Code Noise Limits*. As shown, 70 dBA is the applicable limit. These

standards apply when the ambient noise level does not already exceed the noise limit. In cases where the ambient noise level already exceeds the noise limit, the ambient noise level is the applicable noise limit.

Table 7
LA MESA MUNICIPAL CODE NOISE LIMITS

Zone or Land Use Designation	Noise Level (dBA L_{EQ}) Daytime (7 AM to 10 PM)	Noise Level (dBA L_{EQ}) Nighttime (10 PM to 7 AM)
R1 (Urban Residential) and R2 (Medium Low Density Residential)	55	50
R3 (Multiple Unit Residential) and RB (Residential Business)	60	55
C (General Commercial), CN (Neighborhood Commercial), CD (Downtown Commercial), and CM (Light Industrial and Commercial Service)	65	60
M (Industrial Service and Manufacturing)	70	70

Source: La Mesa Municipal Code Section 10.80.040
dBA = A-weighted decibel; L_{EQ} = one-hour average sound level

Section 10.80.100 regulates construction noise, and states that it is unlawful for any person within a residential zone or CN (neighborhood commercial) zone, or within 500 feet of these zones, to operate equipment or perform any outside construction or repair work on buildings, structures, or projects or to operate any pile driver, power shovel, pneumatic hammer, derrick, power hoist, or any other construction-type device between the hours of 10:00 p.m. of one day and 7:00 a.m. of the next day, or on Sundays unless a special permit authorizing the activity has been duly obtained from the chief building official. As discussed in Item 13.a, construction noise, on-site operational noise, or operational transportation noise resulting from implementation of the project would not generate a substantial permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the General Plan or noise ordinance. As such, construction and operation of the proposed project would not conflict with land use policies relative to land use – noise compatibility.

In consideration of the above discussion in Item 11.b, the EDCO Station improvements would 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. Impacts would be less than significant for this issue.

12. Mineral Resources

		Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:					
a.	Result in the loss of availability of a known mineral resource that would be a value to the region and the residents of the state?	☐	☐	☐	☒
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?	☐	☐	☐	☒

a. Mineral resources are commonly defined as a concentration or occurrence of natural, solid, inorganic, or fossilized organic material in or on the earth's crust in such form and quantity and of such a grade or quality that it has reasonable prospects for economic extraction. Mineral resources can be categorized into three classes: fuel, metallic, and non-metallic. Fuel resources comprise coal, oil, and natural gas. Metallic (metal) resources include categories such as gold, silver, iron, and copper. Non-metallic (non-metal) resources include industrial minerals such as boron compounds, rare-earth elements, clays, limestone, gypsum, salt, and dimension stone; and construction aggregate (sand and gravel, and crushed stone).

The Surface Mining and Reclamation Act of 1975 (SMARA) is the primary regulator of surface mining in the state. The act requires the state geologist (California Geological Survey) to identify all mineral deposits in the state and to classify them based on their significance. SMARA defines a mineral deposit as a naturally occurring concentration of minerals in amounts or arrangement that under certain conditions may constitute a mineral resource. The concentration may be of value for its chemical or physical characteristics. The classification of these mineral resources is a joint effort of the state and local governments. It is based on geologic factors and requires that the State Geologist classify the mineral resources area as one of the four Mineral Resource Zones (MRZs), Scientific Resource Zones (SZs), or Identified Resource Areas (IRAs), described below:

- MRZ-1: A Mineral Resource Zone where adequate information indicates that no significant mineral deposits are present or likely to be present.
- MRZ-2: A Mineral Resource Zone where adequate information indicates that significant mineral deposits are present, or a likelihood of their presence and development should be controlled.
- MRZ-3: A Mineral Resource Zone where mineral resource significance is undetermined.
- MRZ-4: A Mineral Resource Zone where there is insufficient data to assign any other MRZ designation.
- SZ Areas: Containing unique or rare occurrences of rocks, minerals, or fossils that are of outstanding scientific significance shall be classified in this zone.

- IRA Areas: County or State Division of Mines and Geology Identified Areas where adequate production and information indicate that significant minerals are present.

The California Geological Survey has designated portions of the City as MRZ-2 (Division of Mines and Geology 1996). The La Mesa General Plan Conservation and Open Space Element, however, states that the City does not have any significant mineral resources (City 2012). As noted throughout this IS/ND, the entire EDCO Station is developed area. It is not being used for mineral resource extraction, and mineral resource extraction would be an incompatible use with the site's current and proposed zoning and adjacent civic, commercial/retail, and residential land uses. Thus, no impact would occur in relation to this issue.

b. Please refer to response to Item 12.a, above. No impact would occur for this issue.

13. Noise

		Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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?	☐	☐	☒	☐
b.	Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
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?	☐	☐	☒	☐

A Noise and Vibration Assessment was prepared for the project, which is included as Appendix B to this IS/ND (HELIX 2021b). The results and conclusions of this analysis are summarized in this section.

a. The project would result in an increase in noise during project construction and operation, as discussed below. All noise level or sound level values presented herein are expressed in terms of decibels (dB), with A-weighting (dBA) to approximate the hearing sensitivity of humans. Time-averaged noise levels are expressed by the symbol L_{EQ}, with a specified duration. The Community Noise Equivalent Level (CNEL) is a 24-hour average, where noise levels during the evening hours of 7:00 p.m. to 10:00 p.m. have an added 5 dBA weighting, and noise levels during the nighttime hours of 10:00 p.m. to 7:00 a.m. have an added 10 dBA weighting.

Per the City Noise Ordinance, construction-related noise impacts would be considered significant if construction noise would exceed 10 dBA above existing ambient noise levels, or if construction activities occur during the hours of 10:00 p.m. and 7:00 a.m., or on Sunday, within 500 feet of residences. Operational noise impacts would be considered

significant if the project would generate noise levels at the property line of any property exceeding: 70 dBA next to commercial zone property lines and 75 dBA next to industrial/manufacturing zone property lines. For traffic-related noise, impacts are considered significant if noise levels at nearby noise-sensitive land uses (NSLUs) would increase by 3 CNEL or more.

Construction/installation of the exit scale and scale house would require the use of equipment. Anticipated construction activities include demolition of pavement, grading and excavations, installation of the exit scale and scale house, and pavement repair. Standard equipment used on the site is assumed to include a concrete/pavement saw, backhoe, dozer, excavator, and roller. Blasting or the use of pile drivers is not anticipated to be required. The loudest construction equipment anticipated to be used would be a concrete/asphalt saw which generate typical noise levels of 82.6 dBA L_{EQ} at a distance of 50 feet (USDOT 2008). At the nearest NSLU to the construction area (residential buildings approximately 1,000 feet northwest), the resulting noise would be 56.6 dBA L_{EQ}, without considering intervening terrain or structures. Based on the noise survey measurements conducted in the project area, the daytime ambient noise level in the vicinity of the NSLUs to the northwest is approximately 55 dBA L_{EQ}. Therefore, the loudest construction anticipated noise would not exceed the ambient noise level at nearby NSLU by the 10 dBA increase threshold.

Once operational, the exit scale and scale house would not be a significant source of noise. Increasing the permitted throughput of the EDCO Station from 1,000 tpd to 2,000 tpd would not require a physical expansion of the facility or modifications to any equipment within the facility. Therefore, the project would not result in a permanent increase in ambient noise levels from on-site noise sources.

Changes in off-site traffic noise as a result of increasing the EDCO Station's maximum permitted throughput was analyzed using U.S. Department of Transportation Federal Highway Administration (FHWA) Traffic Noise Model (TNM) version 2.5 and the project trip analysis contained in the TIA, as described above. The results of the traffic noise analysis for receivers 50 feet from the roadway centerline are shown in Table 8, *Operational Traffic Noise Levels (dBA CNEL)*. The increase in noise is compared to the allowable increase of 3 dBA.

Table 8
OPERATIONAL TRAFFIC NOISE LEVELS (DBA CNEL)

Roadway Segment	Existing AM Peak Hour	Existing + Project PM Peak Hour	Increase	Allowable Increase	Exceed Allowable Increase?
Spring Street – I-8 Ramps to University Avenue	65.8	66.2	0.4	3	No
Center Street – Guild Street to Commercial Street	59.9	62.2	2.3	3	No
Commercial Street – Center Street to Spring Street	61.8	63.9	2.1	3	No
Center Drive – Commercial Street to Jackson Drive	60.0	61.1	1.1	3	No

Source: TNM 2.5

It is noted that there are no NSLUs along any of the project-affected road segments. As shown in Table 8, the maximum noise increase as a result of the addition of project traffic would be 2.3 dBA CNEL. This increase would not exceed the 3 dBA CNEL level which is considered a "just detectable" sound level increases in typical noisy environments. Therefore, construction noise, on-site operational noise, or operational transportation noise resulting from implementation of the project would not generate a substantial permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the General Plan or noise ordinance. Impacts would be less than significant for this issue.

b. Vibration is measured in feet or inches (in). Acceleration is measured by comparing acceleration to that of the Earth's gravity, and this unit is "G." These units of acceleration or velocity are relative to time in seconds (sec) and are noted as in/sec^2 for acceleration and in/sec for velocity. Displacement is not relative to time and is only shown as inches. Vibration effects can be described by its peak and root mean square (RMS) amplitudes. Building damage is often discussed in terms of peak velocity, or peak particle velocity (PPV). The PPV is defined as the maximum instantaneous positive or negative peak of the vibration signal. Decibel notation is for vibration is noted as VdB.

   Excessive ground-borne vibration would occur if construction-related ground-borne vibration exceeds the "strongly perceptible" vibration annoyance potential criteria for human receptors of 0.1 inch per second PPV or the damage potential criteria to relatively old residential structures 0.5 inch per second PPV for continuous/frequent intermittent construction sources (such as impact pile drivers, vibratory pile drivers, and vibratory compaction equipment), as specific by Caltrans (2020). For transit sources, vibration impacts are considered significant if vibration levels would exceed 72 VdB.

   Construction activities known to generate excessive ground-borne vibration, such as pile driving or blasting, would not be conducted by the project. A possible source of vibration during project construction activities would be a vibratory roller, which may be used during pavement repair around the exit scale on Industrial Lane, approximately 20 feet from the nearest off-site building (industrial/commercial). There are no vibration sensitive land uses in the project vicinity. A large vibratory roller would create approximately 0.210 inch per second PPV at a distance of 25 feet (Caltrans 2013). A 0.210 inch per second PPV vibration level would equal 0.27 inch per second PPV at a distance of 20 feet. These vibrations would net exceed the potential damage criteria for normal structures of 0.5 inch per second PPV. Once operational, the project would not be a substantial source of ground-borne vibrations. Therefore, although a vibratory roller may be perceptible to nearby industrial/commercial building occupants, impacts associated with construction equipment or operational vibration impacts would be less than significant for this issue.

c. The closest airport to the project site is Gillespie Field, approximately 4.5 miles to the northeast. Montgomery Field is located approximately 7 miles to the northwest, Marine Corps Air Station (MCAS) Miramar is located approximately 9 miles to the northwest, and San Diego International Airport is approximately 10 miles to the southwest. The project site is not located within the 60 dBA CNEL noise contours for any of these airports (San Diego Regional Airport Authority 2010a; 2010b; 2011; 2014). Therefore, the project would not expose people residing or working in the project area to excessive noise from aircraft or airport operations and the impact would be less than significant.

14. Population and Housing

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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)?	☐	☐	☐	☒
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

a. The project does not propose construction of new homes. Rather, it would be a focused industrial expansion, much of which has been in place as a result of emergency need for additional service over the past year plus. It would support 16 additional employees each day over past conditions. These employees may already reside in the City, or may be within driving distance from an abutting City (e.g., El Cajon, San Diego, etc.), which would result in no change to housing in the City. Even if these new employees moved to the City and established new households, the City could obtain approximately 16 to 40 new City residents based upon the San Diego Association of Governments (SANDAG 2019) rate of 2.40 persons per household. This would not represent substantial unplanned population growth in a city with a population of approximately 59,000 residents. The project would not be extending roads or other major infrastructure that could affect areal growth patterns. The project would have no impact for this issue.

b. No housing is sited within EDCO Station, and no people or housing would be displaced with improvement implementation. No impact would occur.

15. Public Services

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:				
i. Fire protection?	☐	☐	☒	☐
ii. Police protection?	☐	☐	☒	☐

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
iii. Schools?	☐	☐	☐	☒
iv. Parks?	☐	☐	☐	☒
v. Other public facilities?	☐	☐	☒	☐

a.i. The proposed focused expansion is in a developed area of the City, which is not considered at high risk for wildland fires. Placement of a 100 SF metal structure on an existing industrial site would not noticeably change fire protection service needs already existing for EDCO Station. Although the project could potentially incrementally result in increases in calls for fire protection and/or emergency service due to the small number of 16 potential additional employees, no new facilities or improvements to existing facilities would be required as a result of the project. As such, the project would not result in substantial adverse physical impacts associated with the provision of new or physically altered fire facilities and impacts for this issue would be less than significant.

a.ii. The project proposes receipt and management of an additional 1,000 tpd of waste per day, which would require an additional approximately 16 employees. The additional number of employees, as well as additional facility users based on increased tonnage, could incrementally increase the demand for La Mesa Police Department protection services in the service area that would be a very small percentage of City-wide need. The increase would not be expected to result in the need for new or altered governmental facilities which would, in turn, result in significant environmental impacts. Impacts would be less than significant for this issue.

a.iii. The project is associated with an increase in tonnage of recycled materials processing and improvements in internal site circulation. As such, it is an industrial/commercial facility without associated residential uses. No school-aged children would be added to local school loads due to project implementation. As such, no impact would occur.

a.iv. As noted in Item a.iii, the project is not residential in nature, and is therefore not required to pay into City park development impact fees designed to address additional park use associated with new housing. No impact is identified.

a.v. As noted in Item a.iii, the project is not residential in nature. The small number of additional employees (16) may already live in the City or may live elsewhere. Regardless, their use of other public facilities such as senior centers, community centers, public pools, and/or libraries during non-work hours would have a less than significant impact on the facilities, as those few employees could constitute only a very small increase in number of visitors to any particular facility on any given day. The proposed EDCO Station improvements would not individually result in a need to construct new types of other public facilities. Impacts would be less than significant for this issue.

16. Recreation

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☒	☐
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?	☐	☐	☐	☒

a. Please refer to Item 15.a.v. The small number of additional employees (16) may already live in the City or may live elsewhere. Regardless, their small number would not be expected to result in substantial physical deterioration (or acceleration of that deterioration) of existing park facilities. A less than significant impact is assessed.

b. Please refer to Item 16.a. The EDCO focused expansion would not require the construction or expansion of off-site recreational facilities. No impact is identified for this issue.

17. Transportation

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	☐	☐	☐	☒
b. Conflict or be inconsistent with CEQA Guidelines § 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)?	☐	☐	☒	☐
d. Result in inadequate emergency access?	☐	☐	☒	☐

LLG prepared a Transportation Impact Analysis (TIA) in November 2021 that includes a local mobility analysis and vehicle miles traveled (VMT) analysis for the project. The TIA is included as Appendix C of this IS/ND and is summarized below.

a. The project entails minor facility improvements within the EDCO Station, as well as an increase in daily allowable load out capacity. No changes to Circulation Element roadways are proposed. During construction, Commercial Street may be temporarily obstructed for

short periods of time; however, the City requires traffic control plans for any construction activity that will disrupt traffic flow on city streets. There are no existing sidewalks, transit stations, bus stops, or bicycle lanes along surrounding roadways. The project would not affect any such facilities in the vicinity. Following construction, all forms of circulation would occur in the same manner as present. Thus, the project would have no impact in relation to this issue.

b. In September 2013, the Governor's Office signed Senate Bill (SB) 743 into law, starting a process that fundamentally changes the way transportation impact analyses are conducted under CEQA. In response to the passage of SB 743, the Governor's Office of Planning and Research (OPR) was required to amend the CEQA Guidelines to provide a new approach to evaluating traffic impacts. These changes include the elimination of auto delay, level of service, and similar measurements of vehicular roadway capacity and traffic congestion as the basis for determining significant impacts. The mandate of SB 743 was to devise an alternative traffic impact evaluation criterion that would promote the reduction of GHG emissions as well as foster the development of multi-modal transportation networks and a diversity of land uses. SB 743 further suggested that a measurement such as VMT would be an appropriate method to evaluate traffic impacts. VMT is defined as a measurement of miles traveled by vehicles within a specified region and for a specified time period. VMTs are calculated based on individual vehicle trips generated and their associated trip lengths.

   The Institute of Transportation Engineers (ITE) San Diego Section prepared Guidelines for Transportation Impact Studies in May 2019 for use in the San Diego Region. The recommended methodology for conducting a VMT analysis is based on guidance prepared by OPR as provided in the published Technical Advisory on Evaluating Transportation Impacts in CEQA (OPR 2018).

   Based on guidance from ITE, transportation VMT analysis for CEQA should be conducted using the SANDAG Regional Travel Demand Model. The model outputs can be used to produce VMT/ capita, VMT / employee, and total VMT. The EDCO Station is an industrial land use type. ITE and OPR do not recommend a specific threshold of significance for industrial projects. Within the City of Carlsbad and the City of Escondido, an industrial project is considered to have a significant impact if its VMT/employee exceeds the regional average VMT/employee. It should be noted that goods movement is not subject to VMT analysis per OPR guidelines. Therefore, goods movement trips associated with an industrial project would not be included when determining VMT/employee; in this case trips created by the project's collection trucks and transfer tractor/trailers.

   The SANDAG Series 14 Year 2016 Travel Demand Model was used to calculate the regional average baseline and the project-specific VMT per employee. The model generates a land use-specific average trip length as well as an average daily volume, which ultimately calculates the total VMT per employee. The SANDAG Series 14 Year 2016 Travel Demand Model can be found at the link below, with the Project specific results included in Appendix B to the IS/ND Appendix C. https://sandag.maps.arcgis.com/apps/webappviewer/index.html?id=5b4af92bc0dd4b7babbce21a7423402a).

   The regional average baseline VMT results provided by SANDAG show that the regional average baseline VMT per employee is 27.2 miles. For the purpose of determining the significance of VMT impacts, the EDCO Station VMT per employee would need to be at or below the regional average in order to result in a less-than-significant transportation impact. The project-specific VMT per employee is calculated at 24.8 VMT per employee per the

SANDAG Series 14 Year 2016 Travel Demand Model, which is less than the regional average. As a result, the project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3. Impacts would be less than significant for this issue.

c. There would be no hazardous design features or incompatible uses introduced because of EDCO Station improvements. Access to the Station would remain as under existing conditions. The project does not propose new roadways. The only alteration to an existing roadway would be to Industrial Lane. One travel lane would be removed. That lane already functions as a one-way street (see existing signage in Figure 6 of this IS/ND), and is also used solely by EDCO Station-related traffic. No unique roadway features, traffic patterns, or incompatible vehicles would be introduced as part of the development. As a result, the project would not substantially increase hazards due to a geometric design feature. Less than significant impacts would occur in relation to this issue.

d. During construction of the project, it is not anticipated that construction-related vehicles could interfere with emergency response to the site or emergency evacuation procedures in the event of an emergency (e.g., vehicles traveling behind the slow-moving truck). However, such trips would be brief and infrequent. Furthermore, as discussed in Item 9.f, the City requires traffic control plans for any construction activity that will disrupt traffic flow on city streets and project conditions of approval would require that emergency access be maintained during construction. Upon construction, emergency vehicle access would be provided via Allison and Date Avenues. Impacts would be less than significant.

18. Tribal Cultural Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, 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 section 5020.1(k), or	☐	☐	☒	☐
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 Resource Code §5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☐	☒	☐

a.i-ii In accordance with the requirements of AB 52, the City initiated correspondence and sent out notification letters regarding the project to Native American Tribes traditionally and culturally affiliated with the project area. The notices were sent on November 9, 2021.

Responses confirming receipt of the notice were received by the Mesa Grande Band of Mission Indians, the Barona Band of Mission Indians, and the Torres Martinez Desert Cahuilla Indians.

As CEQA lead agency, the City does not have any knowledge supporting potential for the site to be a place or cultural landscape with cultural value to a California Native American tribe. Due to the long term developed nature of the EDCO Station site and the previous ground disturbance, it is unlikely that project construction activities would extend into previously undisturbed materials. Thus, the likelihood to encounter intact subsurface tribal cultural resources is low. However, there is still a possibility for buried, unknown tribal cultural resources to occur. As noted in Item 5.b, as a condition of approval, a note shall be placed on the building plans stating that should any archeological (cultural) resources or human remains be discovered during construction-phase ground-disturbing activities, all work in the immediate vicinity must stop and the project applicant shall notify the City immediately. A qualified professional shall be retained to evaluate the finds and recommend appropriate action. For human remains, the applicant shall notify the County Coroner. For human remains determined to be of Native American origin, the procedures outlined in CEQA Section 15064.5 (d) and (e) shall be followed. The applicant shall ensure, to the satisfaction of the City and the Native American Heritage Foundation, if applicable, that appropriate measures are undertaken prior to resuming any project activities that may affect such resources. With the inclusion of this condition of approval and the required regulatory compliance, impacts to tribal cultural resources would be less than significant.

19. Utilities and Service Systems

		Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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?	☐	☐	☒	☐
b.	Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	☐	☐	☒	☐
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?	☐	☐	☒	☐
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?	☐	☐	☐	☒
e.	Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☐	☒

a. Each of these utilities is already in place and serving the existing EDCO Station. The proposed actions would not result in relocation or construction of new or expanded facilities, and therefore would not result in associated significant environmental effects related to that construction. Any increases in utilities needs would be accommodated within existing collection, treatment, or transmission facilities. Impacts would be less than significant.

b. Helix Water District (District) supplies water to the site, which has supported EDCO Station for 24 years. Inclusion of approximately 16 new employees and potential need for additional maintenance water would result in an incremental change to demand. The District prepared a UWMP that provides forecasts for water demand and supply. As part of the planning process, current and projected population data within the District's service area is provided by SANDAG and the growth/use type parameters established by local community general plans. Thus, since the project would continue to be consistent with the General Plan designation of City Public Use, the project's growth is accounted for in the UWMP.

   The UWMP (in Table 7-4, Multiple Dry Years Supply and Demand Comparison identifies the District's water supply and projects the reliability through the 25-year planning horizon, for a single year and five consecutive dry years beginning in year 2025. The District forecasts indicate that even for a 6-year dry period, the District would continue to have adequate supply to meet the service area demands. Through the exercise of preparing the UWMP, the District concluded that if supplies continue to be developed as planned and conservation measure continue to be employed, no shortages are anticipated for the District during future normal, single-dry years, or a consecutive five-year drought through the 25-year planning horizon to 2045 (UWMP 2021). Thus, since the project's water demands have been accounted for in the UWMP and that the District has not forecasted any shortages under any scenarios, the project would have a less than significant impact in relation to this issue.

c. The City is a member of the Metro Wastewater Joint Powers Authority (MWJPA), a coalition of agencies that utilize the Point Loma Wastewater Treatment Plant (WTP) operated by the City of San Diego. Wastewater generated within the City is collected by the City's sewer service and then conveyed to the Point Loma WTP located at the south end of the Point Loma peninsula. The Point Loma WTP treats approximately 175 million gallons per day (mgd) of wastewater generated in a 450-square-mile area by more than 2.2 million residents. The WTP has a treatment capacity of 240 mgd (City of San Diego 2020). The Point Loma WTP is owned and operated by the City of San Diego and allows 15 other municipalities, including the City, to purchase allocations of wastewater treatment capacity at the plant.

   The project would incrementally increase wastewater generation at the site due use of the facility by 16 additional employees, and possible additional wash water used during facility cleaning. Given the WTP's existing remaining treatment capacity of 65 mgd, the project's increase would represent a negligible portion of the WTP's remaining capacity. Therefore, the Point Loma WTP has adequate capacity to serve the project's projected demand in addition to its existing commitments. Impacts would be less than significant.

d. The proposed improvements would generate solid waste during construction based on removal of approximately 1,900 SF of asphalt and would be expected to lay a concrete pad to support the scale house. Consistent with Title 14 of the La Mesa Building Code (Chapter 14.27, Construction and Demolition Debris Diversion Deposit Program), 75 percent of designated recyclables (including asphalt, concrete, and dirt reuse) as appropriate, would occur.

Once operational, the new scale and scale house would be integral to continued function of EDCO Station. The Station is critical to minimization of municipal solid waste generation through its diversion of waste from landfills through provision of a purpose-built facility for storage and collection of recyclables and yard waste in accordance with 2019 Title 24 Part 11 CALGreen Standards. Project implementation would support Title 7.22, Mandatory Recycling, of the La Mesa Municipal Code and AB 939, which mandates that 50 percent of solid waste generated be diverted from landfill disposal through source reduction, recycling, or composting. 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. Rather, it would incrementally help the City to meet federal, state, and La Mesa management and reduction statutes and regulations related to solid waste. Thus, the project would have a beneficial effect and no impact is identified for this issue.

e. Please refer to item 19.d. Proposed project improvements would support improved operations as a facility specifically designed to support regulations related to solid waste under the California Integrated Waste Management Act and City recycling programs. Project effects would be beneficial and are identified as having no impact.

20. Wildfire

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
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?	☐	☐	☐	☒
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?	☐	☐	☐	☒
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?	☐	☐	☐	☒

a. Please refer to items 9.f and 17.c. The project would have a less than significant impact in relation to this issue.

b. The project site improvement area is level and does not contain slopes. The surrounding area is highly developed and does not support the common characteristics identified as a wildfire risk, such as difficult terrain, inadequate access, and unmaintained vegetation. As

discussed in Item 9.g, the project is not within a very high fire hazard severity zone as mapped by CALFIRE. The project would have no impact for this issue.

c. Please refer to Item 20.b. The proposed project is located in a developed area. The project does not involve the installation of fuel breaks, emergency water sources, power lines, or extension or upgrades of existing utilities, such as sewer, water, electric, gas, and telecommunication facilities. Therefore, no impacts related to exacerbated fire risk associated with such extension would occur. No impact would occur for this issue.

d. Please refer to items 7.a.iv, 10.c, and 20.b. The project is in a developed area. It would not expose people or structures to significant risk related to downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. No impact would occur for this issue.

21. Mandatory Findings of Significance

		Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Does the project:					
a.	Have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number, or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☐	☒	☐
b.	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.)	☐	☐	☒	☐
c.	Have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☒	☐

a. The project site is developed with structures and pavement in a similarly developed industrial area. The site does not contain or support sensitive habitat or special status species.

The project would not affect any known archaeological, tribal cultural, or paleontological resources. Yet, while the project site is highly disturbed, there is still a slight potential for unknown paleontological resources to be disturbed or uncovered during project construction. With required compliance with regulatory codes for discovery of archaeological, tribal cultural resources, or paleontological resources, the project would not eliminate important examples of the major periods of California history or prehistory.

a. A total of 10 cumulative projects have been identified in consultation with the City for inclusion in the cumulative analysis, which include the following past, current, and probable future projects:

- Allison Avenue Transit Oriented Development (TOD) Project: consisting of construction of an affordable workforce residential community on 1.23 acres located at the southeast corner of the Allison Avenue/Date Avenue intersection in the Downtown village area.
- Wilson Street Mixed Use: includes 49 residential units and 1,345 SF of gross leasable retail at 5220 Wilson Street.
- Costco Gas Station: included the installation of a gas station at the existing Costco store on Fletcher Parkway, just north of Baltimore Drive.
- Alvarado Specific Plan: includes the up to 950 apartments in four buildings on a site south of I-8 and east of 70th Street.
- Lake Murray Village: included the development of a 2,000-SF Starbucks coffee shop located in the northwest quadrant of the Jackson Drive/Center Drive intersection in the City.
- Spring Street Starbucks: included an 1,850-SF coffee shop located in the northeast quadrant of the Spring Street/Palm Avenue intersection in the City.
- Spring Street Mixed-Use Project: consists of 48 multi-family dwelling units located at 4210 Spring Street.
- 7601 University Avenue Project: consists of 60 multi-family dwelling units.
- Jefferson La Mesa project: consists of 230 multi-family dwelling units and 4 live/work units. The “work” part is 712 SF per unit, for a total of 2,848 SF. The total square footage of these dwelling units is 165,760.
- Montebello: consists of Montebello North and Montebello South and is located east of Maple Avenue on either side of El Cajon Boulevard. Montebello North Site consists of 120 multi-family units and 6,000 of retail. This development will replace the existing 37 multi-family units, 5 single family units and 5,500 restaurant/ specialty retail currently on the site. Montebello South is located in the southwest quadrant of the El Cajon Boulevard/Maple Avenue intersection and consists of 80 apartments, 5,000 SF of specialty retail and 3,000 SF of office.

Although not anticipated, there may be short-term cumulative impacts in relation to any diversion of traffic or access to the greater project site area. However, as necessary and appropriate the project would prepare a traffic control plan. Similarly, the other cumulative projects would be required to prepare traffic control plans when required. Each plan would require approval of the City Engineer prior to the issuance of the appropriate permits. Further, the TIA (see Appendix C) prepared for the project evaluated the potential for cumulative impacts to occur in relation to the projects listed above and the proposed project. It was determined that no significant transportation impacts would occur.

As discussed under Item 3.b, the project's long-term emissions of criteria pollutants and precursors would not exceed the SDAPCD daily or annual screening thresholds. Therefore, the project's operational activities would not result in a cumulatively considerable net increase of criteria pollutants that would violate any air quality standard or contribute substantially to an existing or projected air quality violation. Similarly, the project would have a less than significant impact in relation to GHG, which is inherently discussed in terms of cumulative impacts.

All resource topics associated with the project have been analyzed in accordance with State CEQA Guidelines and found to pose no impact, less-than-significant impact, or less than significant with mitigation. Potential cumulative projects that could be constructed in the vicinity of the project would be required to comply with existing applicable federal, state, and local regulations.

c. The project would not consist of uses or activities that would substantially and negatively affect persons in the vicinity. In addition, all resource topics associated with the project have been analyzed in accordance with CEQA and the State CEQA Guidelines and found to pose no impact, less-than-significant impact, or less than significant with mitigation. As discussed in Item 9, Hazards and Hazardous Materials of this IS/ND, there are no concerns from past activities at the site and no present hazardous materials and/or wastes concerns have been identified. All of the collected, putrescible waste unloading and transfer operations occur within an enclosed building, minimizing, or eliminating negative impacts due to dust, noise, or odor.

   Consequently, the project would not result in any environmental effects that would cause substantial adverse effects on human beings directly or indirectly.

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