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## **DRAFT FINAL MITIGATED NEGATIVE DECLARATION**

**PROJECT NAME: Jacumba Fire Station No. 43**

**This Document is Considered Draft Until it is Adopted by the Appropriate  
County of San Diego Decision-Making Body.**

This Mitigated Negative Declaration is composed of this form along with the Initial Study Checklist that includes the following:

A. Mitigation Monitoring and Report Program

B. Responses to comments received during public review

C. Final Initial Study – Environmental Checklist Form and Appendices

a) Initial Study— Environmental Checklist Form

b) Technical Studies and Reports as referenced

**Project Description:** The County of San Diego Department of General Services (DGS) is proposing to construct a new approximately 8,500 square foot fire station on an approximately 2.77-acre site (portion of APN 660-150-18-00) in the unincorporated community of Jacumba. The proposed fire station would replace the existing Jacumba fire station located at 1255 Jacumba Street, Jacumba, CA 91934 (APN 660-053-01-00). The new fire station would be identified by the same station number (i.e., Fire Station No. 43) and would have the same service area as the existing Jacumba Fire Station. The new fire station would be under the jurisdiction of the San Diego County Fire Protection District (San Diego County Fire). However, the station would be operated in cooperation with the California Department of Forestry & Fire Protection (CAL FIRE), who would be contracted by San Diego County Fire to provide fire protection and emergency medical services. See Attachment C, “Final CEQA Initial Study - Environmental Checklist Form,” for a detailed description of the proposed project.

**Project Location:** The proposed fire station would be developed on an approximately 2.77-acre portion (project site or project boundary) of a 5-acre property (APN 660-150-18-00). The project site is located at 44850 Old Highway 80 in the unincorporated community of Jacumba, which is situated in southeastern San Diego County, bordering Mexico along its northern perimeter. The project site is located approximately 0.4-mile north of the U.S. - Mexico International border. Primary access to the project site is provided by Old Highway 80, which forms the site’s southerly boundary. A project location map is shown in Figure 1.

**Project Proponent:** County of San Diego, Department of General Services



Source: Adapted by Ascent in 2024.

**Figure 1. Project Location**

Minor clarifications and revisions were made to the Draft Initial Study/Mitigated Negative Declaration in response to public comments received during the public review period. These minor revisions, which are indicated in strikeout for deletions and underline for additions, are intended to clarify or elaborate upon the findings in the Draft Initial Study and do not constitute a substantial revision of the Draft Initial Study. Furthermore, the minor clarifications would not alter the conclusions presented in the Draft Initial Study. These minor revisions and clarifications are provided in Attachment C, "Final CEQA Initial Study - Environmental Checklist Form."

1. California Environmental Quality Act Mitigated Negative Declaration Findings:

Find, that this Mitigated Negative Declaration reflects the decision-making body's independent judgment and analysis, and; that the decision-making body has reviewed and considered the information contained in this Mitigated Negative Declaration and the comments received during the public review period and, on the basis of the whole record before the decision-making body (including this Mitigated Negative Declaration) that there is no substantial evidence that the project will have a significant effect on the environment.

2. Required Mitigation Measures:

Refer to the attached Initial Study for the rationale for requiring the following mitigation measures (MMs):

**A. BIOLOGICAL RESOURCES:** Implementation of the following mitigation measures would reduce potential impacts to biological resources to less than significant levels:

**MM-BIO-1: Off-site Mitigation.** To offset the loss of 2.55-acres of non-native grassland habitat on the project site, the County of San Diego (County) shall purchase off-site mitigation credits from a County-approved mitigation bank at a 0.5:1 mitigation ratio, consistent with the County's Guidelines for Determining Significance—Biological Resources. The project proponent shall purchase 1.275-acres of non-native grassland habitat credits. If burrowing owls are identified during pre-construction take avoidance surveys (see **MM-BIO-2**), the mitigation ratio shall be increased to 1:1, requiring the purchase of 2.55 acres of non-native grassland habitat credits.

**MM-BIO-2: Burrowing Owl Surveys.** Prior to construction, the County of San Diego shall retain a qualified biologist to conduct pre-construction take avoidance surveys for burrowing owl. The pre-construction take avoidance surveys shall be conducted within 14 days of initiating ground disturbance and/or construction activities per guidelines specified in the Staff Report on Burrowing Owl Mitigation (CDFW 2012). In addition, within 24 hours of initiating ground disturbance and/or construction activities, the qualified biologist shall conduct a final pre-construction take avoidance survey. Surveys shall include areas within the Project footprint and a surrounding 500-foot buffer. The survey shall consist of walking parallel transects and noting any fresh burrowing owl sign or presence. The results of the take avoidance survey shall be provided to the California Department of Fish and Wildlife (CDFW). If more than 14 days pass between the take avoidance survey and initiation of project construction, additional take avoidance survey may be required by the qualified biologist, depending on what actions have been implemented to deter burrowing owls from moving into the project footprint and buffer area.

**MM-BIO-3: Biological Monitoring.** Prior to construction, the County shall retain a biological monitor. The biological monitor shall be present during all initial vegetation clearing, grubbing, and rough grading activities to relocate wildlife out of harm's way, including but not limited to protected birds (including tricolored blackbird and turkey vulture) and American badger. Biological monitoring will ensure the project remains in compliance with any mitigation, monitoring, and compliance reporting program, as well as industry standard Best Management Practices (BMP) such as fugitive dust control, on-site vehicle speed limits, Stormwater Pollution Prevention Plan (SWPPP) implementation, and conditions related to biological resource protection set forth by the County of San Diego and/or regulatory agencies.

**MM-BIO-4: Nesting Bird Avoidance Measures.** Vegetation removal should be conducted outside of the nesting bird season between September 1<sup>st</sup> and January 31<sup>st</sup>. If vegetation removal is required during the nesting bird season (i.e., February 1 and August 31), the County of San Diego shall retain a qualified biologist(s) to conduct a pre-construction avoidance survey for Migratory Bird Treaty Act (MBTA) and California Department of Fish and Wildlife (CDFW)-protected nesting birds within 100 feet of areas proposed for vegetation removal and/or initial grading activities. Additionally, the survey shall be extended to 500 feet for raptors between January 1<sup>st</sup> and July 15<sup>th</sup>. The survey shall be conducted by a qualified biologist(s), defined as someone with familiarity with avian species in the region and at least five years of experience conducting nesting bird surveys, within seven days (i.e., 168 hours) of vegetation removal and/or initial groundbreaking activities. If active, protected nests are observed within the survey area(s), a qualified biologist will determine appropriate minimum disturbance buffers or other adaptive mitigation techniques (e.g., biological monitoring of active nests during construction-related activities, staggered work schedules, altered work locations, sound walls, noise abatement, etc.) and work with the contractor to ensure that direct and indirect impacts on all protected nesting birds are avoided until such nests are no longer active. If the results of the survey are negative, the project will proceed without any further surveys or monitoring as long as there is not a significant lapse (i.e., greater than seven days) in project activity. If more than seven days of inactivity occurs, a new nesting bird survey shall be required prior to reconvening project construction.

**B. CULTURAL RESOURCES:** Implementation of the following mitigation measure would reduce potential impacts to cultural resources to less than significant levels:

**MM-CUL-1: Implement Archaeological and Native American Monitoring.** The County of San Diego (County) shall implement an archaeological and Native American monitoring program and potential data recovery program pursuant to the County's *Guidelines for Determining Significance and Report Format and Requirements for Cultural Resources* and the California Environmental Quality Act (CEQA). The archaeological and Native American monitoring program shall be described in a Monitoring and Discovery Plan and shall include the following requirements:

- Pre-Construction
  - Contract with a County approved archaeologist to perform archaeological monitoring and a potential data recovery program during all earth-disturbing activities, including but not limited to trenching for utilities and installation of BMPs and fencing. The Project Archaeologist shall subcontract with participating Tribes ~~Kumeyaay monitor~~ to conduct Native American monitoring for the project. The Project Archaeologist and ~~tribal~~ Native American monitor shall perform the monitoring duties before, during and after construction.
  - Pre-construction meeting to be attended by the Project Archaeologist and Kumeyaay Native American monitor to explain the monitoring requirements. Participating Tribes shall be invited to pre-construction meeting(s). Any Kumeyaay Native American will be an approved representative of the participating Tribes.
  - Prior to earth disturbing activities, the County shall consult with participating Tribes to identify any Culturally Significant Plants to the Kumeyaay People that may then be incorporated into the final landscape palette for the project.
- Construction
  - **Monitoring.** Both the Project Archaeologist and Kumeyaay Native American monitor are to be onsite during earth disturbing activities. The frequency and location of monitoring of native soils will be determined by the Project Archaeologist in consultation with ~~the~~ a Kumeyaay Native American monitor. Both the Project Archaeologist and Kumeyaay Native American monitor shall evaluate fill soils to ensure that they are negative for cultural resources. If multiple Kumeyaay Tribes are interested in participating in the monitoring effort, a daily/weekly rotation shall be developed to allow equal time for observation.
  - **Monthly Reporting.** Weekly summaries of activities and results will be shared with participating Tribes. If grading activities exceed one month, the Project Archaeologist shall submit monthly status reports to the County Director of General Services and participating Tribes starting from the date of the notice to proceed to termination of implementation of the grading monitoring program. The reports shall briefly summarize all activities during the period and the status of progress on overall plan implementation.
  - If cultural resources are identified during construction monitoring:
    - Both the Project Archaeologist and Kumeyaay Native American monitor have the authority to divert or temporarily halt ground disturbance operations in the area of the discovery.
    - The Project Archaeologist shall contact the County Archaeologist at the time of discovery.
    - The Project Archaeologist in consultation with the County Archaeologist and Kumeyaay Native American shall determine the significance of discovered resources.



- The Project Archaeologist shall notify the Campo Band of Mission Indians, Manzanita Band of the Kumeyaay Nation, Jamul Indian Village, and La Posta Band of Diegueño Mission Indians of the unanticipated discovery.
- Should a potential Tribal Cultural Resource (TCR) be identified, the Project Archaeologist shall consult with consulting tribes for a final determination.
- Construction activities will be allowed to resume after the County Archaeologist has concurred with the significance evaluation.
- Isolates and non-significant deposits shall be minimally documented in the field. Should the isolates and non-significant deposits not be collected by the Project Archaeologist, the Kumeyaay Native American monitor may collect the cultural material for transfer to a Tribal curation facility, onsite reinterment (if appropriate), or repatriation program.
- If cultural resources discovered during construction are determined to be significant, a new or modified Research Design and Data Recovery Program shall be prepared by the Project Archaeologist in consultation with the Kumeyaay Native American monitor and approved by the County Archaeologist. The program shall include reasonable efforts to preserve (avoid) unique cultural resources of Sacred Sites; the capping of identified Sacred Sites or unique cultural resources and placement of development over the cap if avoidance is infeasible; and data recovery for non-unique cultural resources. The preferred option is preservation (avoidance). If data recovery and collection are required, after avoidance and re-design are attempted, an appropriate on-site location or curation facility shall be determined in consultation with the participating Tribes.
- Discovery of Possible Human Remains.
  - The Property Owner or their representative shall contact the County Medical Examiner or representative and the Director of General Services when possible human remains are identified. The Project Archaeologist shall simultaneously inform the participating Tribes of the find.
  - Upon identification of possible human remains, no further disturbance shall occur in the area of the find until the County Medical Examiner has made the necessary findings as to origin. If the human remains are to be taken offsite for evaluation, they shall be accompanied by ~~the~~ a participating Kumeyaay Native American monitor.
  - If the remains are determined to be of Native American origin, the Most Likely Descendant (MLD), as identified by the Native American Heritage Commission (NAHC), shall be contacted by the Property Owner or their representative in order to determine proper treatment and disposition of the remains.
  - The Project Archaeologist shall notify the Campo Band of Mission Indians, Manzanita Band of the Kumeyaay Nation, Jamul Indian Village, and La Posta Band of Diegueño Mission Indians of the identification of human remains.
  - The immediate vicinity where the Native American human remains are located is not to be damaged or disturbed by further development activity until

consultation with the MLD regarding their recommendations as required by Public Resources Code Section 5097.98 has been conducted.

- Public Resources Code §5097.98, CEQA §15064.5 and Health & Safety Code §7050.5 shall be followed in the event that human remains are discovered.

• ~~Rough Grading~~

- **Final Monitoring Report.** Upon completion of earth-disturbing activities (e.g., grading, trenching, etc.)~~Rough Grading~~, the Project Archaeologist shall prepare a monitoring report identifying whether resources were encountered.
  - **No Resources Encountered.** If no archaeological resources are encountered during earth-disturbing activities, then a final Negative Monitoring Report substantiating that earth-disturbing activities are completed and no cultural resources were encountered shall be submitted. Archaeological monitoring logs showing the date and time that the monitor was on site and any comments from the Native American Monitor shall be included in the Negative Monitoring Report.
  - **Resources Encountered.** If archaeological resources were encountered during the earth disturbing activities, the Project Archaeologist shall provide an Archaeological Monitoring Report stating that the field monitoring activities have been completed, and that resources have been encountered. The report shall detail all cultural artifacts and deposits discovered during monitoring and the anticipated time schedule for completion of the curation and/or repatriation phase of the monitoring.
  - A copy of the monitoring report shall be provided to the Director of General Services, South Coastal Information Center, and any culturally-affiliated tribe who requests a copy.
  - The Final Monitoring Report will include:

• ~~Final Grading~~

- ~~**Final Report.** The Project Archaeologist shall prepare a final report that documents the results, analysis, and conclusions of all phases of the Archaeological Monitoring Program if cultural resources were encountered during earth-disturbing activities. The report shall include the following, if applicable:~~
  - ▶ Department of Parks and Recreation Primary and Archaeological Site forms
  - ▶ Daily Monitoring Logs
  - ▶ Evidence that all cultural materials have been conveyed as follows:
    - Evidence that all prehistoric materials collected during the archaeological monitoring program have been submitted to a San Diego or Imperial County curation facility or a culturally affiliated Native American Tribal curation facility that meets federal standards per 36 CFR Part 79, and, therefore, would be professionally curated and made available to other archaeologists/researchers for further study. The collections and associated records, including title, shall be transferred to

the San Diego or Imperial County curation facility or culturally affiliated Native American Tribal curation facility and shall be accompanied by payment of the fees necessary for permanent curation. Evidence shall be in the form of a letter from the curation facility stating that the prehistoric archaeological materials have been received and that all fees have been paid.

or

Evidence that all prehistoric materials collected during the grading monitoring program have been repatriated to a Native American group of appropriate tribal affinity and shall be accompanied by payment of the fees necessary, if required. Evidence shall be in the form of a letter from the Native American tribe to whom the cultural resources have been repatriated identifying that the archaeological materials have been received.

- Historic materials shall be curated at a San Diego or Imperial County curation facility and shall not be curated at a Tribal curation facility or repatriated. The collections and associated records, including title, shall be transferred to the San Diego or Imperial County curation facility and shall be accompanied by payment of the fees necessary for permanent curation. Evidence shall be in the form of a letter from the curation facility stating that the historic materials have been received and that all fees have been paid.

- ~~➤ If no cultural resources are discovered, a Negative Monitoring Report must be submitted stating that the archaeological monitoring activities have been completed. Grading Monitoring Logs must be submitted with the negative monitoring report.~~
- ~~○ A copy of the final report shall be submitted to the Director of General Services, South Coastal Information Center, and any culturally affiliated tribe who requests a copy.~~

**C. TRIBAL CULTURAL RESOURCES:** Implementation of the following mitigation measure would reduce potential impacts to tribal cultural resources to less than significant levels:

- Implement mitigation measure MM-CUL-1.

### 3. Project Design Features:

The following project design features (PDFs) are ~~included as part of~~ proposed by the project in compliance with specific environmental laws and regulations and were essential in reaching include environmental benefits considered in the conclusions outlined within the attached Initial Study. While the following are not technically mitigation measures, their implementation must be assured to avoid potentially significant environmental effects. These PDFs are deemed integral to the proposed project and must be implemented.



**PDF-HYD-1: Raise Finished Floor Elevation.** Prior to approval of final design plans, the County Department of Public Works shall verify that all project components located within the 100-year floodplain shall comply with the County of San Diego Flood Damage Prevention Ordinance, County Hydrology Manual, and County Hydraulic Design Manual, which includes raising the finished floor elevation of the site to one (1) foot above base flood elevation.

**PDF-HYD-2: Flood Fencing Types.** Flood fencing shall be either breakaway fencing or flow through fencing, as described below:

- Where flood fencing is provided along Old Highway 80, breakaway type fencing should be used where feasible. Flow-through fencing may be used along Old Highway 80 if drainage conditions warrant its use. However, if flood depths exceed 12 inches, breakaway type fencing (not flow through) must be used along Old Highway 80.
- Where flood fencing is provided elsewhere (not along Old Highway 80), either flow-through or breakaway fencing may be used.

**ADOPTION STATEMENT:** ~~This Draft Mitigated Negative Declaration and the above California Environmental Quality Act findings were made by the San Diego County Department of General Services on September 16, 2024. This document is considered draft until it is adopted by the appropriate County of San Diego decision-making body.~~ This Mitigated Negative Declaration was adopted and the above California Environmental Quality Act findings were made by the County of San Diego Board of Supervisors on March 11, 2025.

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

Marko Medved, P.E., C.E.M.  
Director, Department of General Services

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# **ATTACHMENT A:**

## **Final Mitigation Monitoring and Reporting Program**

**Jacumba Fire Station No. 43 Project**  
**Jacumba, California**  
**SCH No.: 2024090644**

**Lead Agency:**

County of San Diego  
Department of General Services  
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**January 2025**



# FINAL MITIGATION MONITORING AND REPORTING PROGRAM

## A1. INTRODUCTION

This document is the Mitigation Monitoring and Reporting Program (MMRP) for the Jacumba Fire Station No. 43 Project (proposed project). A MMRP is required for the proposed project because the Mitigated Negative Declaration (MND) prepared for the project identified significant adverse environmental impacts, and measures have been identified to mitigate those impacts. This MMRP has been prepared pursuant to Section 21081.6 of the California Public Resources Code, which requires public agencies to “adopt a reporting and monitoring program for the changes made to the project or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment.”

## A2. MITIGATION MONITORING AND REPORTING PROGRAM

As the lead agency, the County of San Diego (County) will be responsible for monitoring compliance with all mitigation measures. Different County departments may be responsible for various aspects of the project. The MMRP identifies the department with the responsibility for ensuring that each individual mitigation measure is completed; however, it is expected that one or more departments will coordinate efforts to ensure such compliance.

The MMRP is presented in tabular form on the following pages. The components of the MMRP are described briefly below.

- **Potential Significant Impact:** The significance threshold is restated to describe the potentially significant impact.
- **Mitigation Measure:** The mitigation measures to be adopted (as identified in the MND) are restated.
- **Timeframe of Mitigation:** Identifies at which stage of the project the mitigation measure shall be completed.
- **Monitoring, Enforcement, and Reporting Responsibility:** Identifies the department within the County with responsibility for mitigation monitoring.

**ATTACHMENT A: FINAL MITIGATION MONITORING AND REPORTING PROGRAM  
Jacumba Fire Station No. 43 Project**

Potential Significant Impact	Mitigation Measure	Timeframe of Mitigation	Monitoring, Enforcement, and Reporting Responsibility
<b>Biological Resources</b>			
<p><b>Impact IV.a)</b> Would the project 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 US Fish and Wildlife Service?</p>	<p><b>MM-BIO-1: Off-site Mitigation</b></p> <p>To offset the loss of 2.55-acres of non-native grassland habitat on the project site, the County of San Diego (County) shall purchase off-site mitigation credits from a County-approved mitigation bank at a 0.5:1 mitigation ratio, consistent with the County's Guidelines for Determining Significance—Biological Resources. The project proponent shall purchase 1.275-acres of non-native grassland habitat credits. If burrowing owls are identified during pre-construction take avoidance surveys (see MM-BIO-2), the mitigation ratio shall be increased to 1:1, requiring the purchase of 2.55 acres of non-native grassland habitat credits.</p> <p><b>MM-BIO-2: Burrowing Owl Surveys</b></p> <p>Prior to construction, the County of San Diego shall retain a qualified biologist to conduct pre-construction take avoidance surveys for burrowing owl. The pre-construction take avoidance surveys shall be conducted within 14 days of initiating ground disturbance and/or construction activities per guidelines specified in the Staff Report on Burrowing Owl Mitigation (CDFW 2012). In addition, within 24 hours of initiating ground disturbance and/or construction activities, the qualified biologist shall conduct a final pre-construction take avoidance survey. Surveys shall include areas within the Project footprint and a surrounding 500-foot buffer. The survey shall consist of walking parallel transects and noting any fresh burrowing owl sign or presence. The results of the take avoidance survey shall be provided to the California Department of Fish and Wildlife (CDFW). If more than 14 days pass between the take avoidance survey and initiation of project construction, additional take avoidance survey may be required by the qualified biologist, depending on what actions have been implemented to deter burrowing owls from moving into the project footprint and buffer area.</p>	<p>MM-BIO-1: Confirmation of purchase prior to project construction activities are initiated, based on results of pre-construction take avoidance surveys identified in MM-BIO-2.</p> <p>MM-BIO-2: Prior to construction, conduct surveys within 14 days of construction.</p> <p>MM-BIO-3: Prior to and during activities involving initial vegetation clearing, grubbing, and rough grading activities.</p> <p>MM-BIO-4: During nesting season (February 1 to August 31)</p>	<p>County of San Diego Department of General Services</p>



Potential Significant Impact	Mitigation Measure	Timeframe of Mitigation	Monitoring, Enforcement, and Reporting Responsibility
	<p><b>MM-BIO-3: Biological Monitoring</b></p> <p>Prior to construction, the County shall retain a biological monitor. The biological monitor shall be present during all initial vegetation clearing, grubbing, and rough grading activities to relocate wildlife out of harm's way, including but not limited to protected birds (including tricolored blackbird and turkey vulture) and American badger. Biological monitoring will ensure the project remains in compliance with any mitigation, monitoring, and compliance reporting program, as well as industry standard Best Management Practices (BMP) such as fugitive dust control, on-site vehicle speed limits, Stormwater Pollution Prevention Plan (SWPPP) implementation, and conditions related to biological resource protection set forth by the County of San Diego and/or regulatory agencies.</p> <p><b>MM-BIO-4: Nesting Bird Avoidance Measures</b></p> <p>Vegetation removal should be conducted outside of the nesting bird season between September 1<sup>st</sup> and January 31<sup>st</sup>. If vegetation removal is required during the nesting bird season (i.e., February 1 and August 31), the County of San Diego shall retain a qualified biologist(s) to conduct a pre-construction avoidance survey for Migratory Bird Treaty Act (MBTA) and California Department of Fish and Wildlife (CDFW)-protected nesting birds within 100 feet of areas proposed for vegetation removal and/or initial grading activities. Additionally, the survey shall be extended to 500 feet for raptors between January 1<sup>st</sup> and July 15<sup>th</sup>. The survey shall be conducted by a qualified biologist(s), defined as someone with familiarity with avian species in the region and at least five years of experience conducting nesting bird surveys, within seven days (i.e., 168 hours) of vegetation removal and/or initial groundbreaking activities. If active, protected nests are observed within the survey area(s), a qualified biologist will determine appropriate minimum disturbance buffers or other adaptive mitigation techniques (e.g., biological monitoring of active nests during construction-related activities, staggered work schedules, altered work locations, sound walls, noise abatement, etc.) and work with the contractor to ensure that</p>		

Potential Significant Impact	Mitigation Measure	Timeframe of Mitigation	Monitoring, Enforcement, and Reporting Responsibility
	direct and indirect impacts on all protected nesting birds are avoided until such nests are no longer active. If the results of the survey are negative, the project will proceed without any further surveys or monitoring as long as there is not a significant lapse (i.e., greater than seven days) in project activity. If more than seven days of inactivity occurs, a new nesting bird survey shall be required prior to reconvening project construction.		
<b>Impact IV.d)</b> 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?	Implement mitigation measures <b>MM-BIO-2</b> , <b>MM-BIO-3</b> , and <b>MM-BIO-4</b> .	See prior timeframes for respective mitigation measures above.	County of San Diego Department of General Services
<b>Impact IV.e)</b> Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	Implement mitigation measure <b>MM-BIO-1</b> .	See timeframe for MM-BIO-1 above.	County of San Diego Department of General Services
<b>Cultural Resources</b>			
<b>Impact V.b)</b> Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	<p><b>MM-CUL-1: Implement Archaeological and Native American Monitoring</b></p> <p>The County of San Diego (County) shall implement an archaeological and Native American monitoring program and potential data recovery program pursuant to the County's <i>Guidelines for Determining Significance and Report Format and Requirements for Cultural Resources</i> and the California Environmental Quality Act (CEQA). The archaeological and Native American monitoring program shall be described in a Monitoring and Discovery Plan and shall include the following requirements:</p> <ul style="list-style-type: none"> <li>• Pre-Construction <ul style="list-style-type: none"> <li>○ Contract with a County approved archaeologist to perform archaeological monitoring and a potential data recovery program</li> </ul> </li> </ul>	Prior to and during project construction activities	County of San Diego Department of General Services

Potential Significant Impact	Mitigation Measure	Timeframe of Mitigation	Monitoring, Enforcement, and Reporting Responsibility
	<p>during all earth-disturbing activities, including but not limited to trenching for utilities and installation of BMPs and fencing. The Project Archaeologist shall subcontract with participating Tribes to conduct Native American monitoring for the project. The Project Archaeologist and Native American monitor shall perform the monitoring duties before, during and after construction.</p> <ul style="list-style-type: none"><li>○ Pre-construction meeting to be attended by the Project Archaeologist and Kumeyaay Native American monitor to explain the monitoring requirements. Participating Tribes will be invited to pre-construction meeting(s). Any Kumeyaay Native American will be an approved representative of the participating Tribes.</li><li>○ Prior to ground disturbing activities, the County shall consult with participating Tribes to identify any Culturally Significant Plants to the Kumeyaay People that may then be incorporated into the final landscape palette for the project.</li><li>● Construction<ul style="list-style-type: none"><li>○ <b>Monitoring.</b> Both the Project Archaeologist and Kumeyaay Native American monitor are to be onsite during earth disturbing activities. The frequency and location of monitoring of native soils will be determined by the Project Archaeologist in consultation with a Kumeyaay Native American monitor. Both the Project Archaeologist and Kumeyaay Native American monitor shall evaluate fill soils to ensure that they are negative for cultural resources. If multiple Kumeyaay Tribes are interested in participating in the monitoring effort, a daily/weekly rotation shall be developed to allow equal time for observation.</li><li>○ <b>Reporting.</b> Weekly summaries of activities and results shall be shared with participating Tribes. If grading activities exceed one month, the Project Archaeologist shall submit monthly status reports to the County Director of General Services and participating Tribes starting from the date of the notice to</li></ul></li></ul>		

Potential Significant Impact	Mitigation Measure	Timeframe of Mitigation	Monitoring, Enforcement, and Reporting Responsibility
	<p>proceed to termination of implementation of the grading monitoring program. The reports shall briefly summarize all activities during the period and the status of progress on overall plan implementation.</p> <ul style="list-style-type: none"><li>○ If cultural resources are identified during construction monitoring:<ul style="list-style-type: none"><li>▪ Both the Project Archaeologist and Kumeyaay Native American monitor have the authority to divert or temporarily halt ground disturbance operations in the area of the discovery.</li><li>▪ The Project Archaeologist shall contact the County Archaeologist at the time of discovery.</li><li>▪ The Project Archaeologist in consultation with the County Archaeologist and Kumeyaay Native American shall determine the significance of discovered resources.</li><li>▪ The Project Archaeologist shall notify the Campo Band of Mission Indians, Manzanita Band of the Kumeyaay Nation, Jamul Indian Village, and La Posta Band of Diegueño Mission Indians of the unanticipated discovery.</li><li>▪ Should a potential Tribal Cultural Resource (TCR) be identified, the Project Archaeologist shall consult with consulting tribes for a final determination.</li><li>▪ Construction activities will be allowed to resume after the County Archaeologist has concurred with the significance evaluation.</li><li>▪ Isolates and non-significant deposits shall be minimally documented in the field. Should the isolates and non-significant deposits not be collected by the Project Archaeologist, the Kumeyaay Native American monitor may collect the cultural material for transfer to a curation facility, onsite reinterment (if appropriate), or repatriation program.</li></ul></li></ul>		

Potential Significant Impact	Mitigation Measure	Timeframe of Mitigation	Monitoring, Enforcement, and Reporting Responsibility
	<ul style="list-style-type: none"><li>▪ If cultural resources discovered during construction are determined to be significant, a new or modified Research Design and Data Recovery Program shall be prepared by the Project Archaeologist in consultation with the Kumeyaay Native American monitor and approved by the County Archaeologist. The program shall include reasonable efforts to preserve (avoid) unique cultural resources of Sacred Sites; the capping of identified Sacred Sites or unique cultural resources and placement of development over the cap if avoidance is infeasible; and data recovery for non-unique cultural resources. The preferred option is preservation (avoidance). If data recovery and collection are required, after avoidance and re-design are attempted, an appropriate on-site location or curation facility shall be determined in consultation with the participating Tribes.</li><li>○ Discovery of Possible Human Remains.<ul style="list-style-type: none"><li>▪ The Property Owner or their representative shall contact the County Medical Examiner or representative and the Director of General Services when possible human remains are identified. The Project Archaeologist shall simultaneously inform the participating Tribes of the find.</li><li>▪ Upon identification of possible human remains, no further disturbance shall occur in the area of the find until the County Medical Examiner has made the necessary findings as to origin. If the human remains are to be taken offsite for evaluation, they shall be accompanied by a participating Kumeyaay Native American monitor.</li><li>▪ If the remains are determined to be of Native American origin, the Most Likely Descendant (MLD), as identified by the Native American Heritage Commission (NAHC), shall be contacted by the Property Owner or their representative in order to determine proper treatment and disposition of the remains.</li></ul></li></ul>		

Potential Significant Impact	Mitigation Measure	Timeframe of Mitigation	Monitoring, Enforcement, and Reporting Responsibility
	<ul style="list-style-type: none"> <li>▪ The Project Archaeologist shall notify the Campo Band of Mission Indians, Manzanita Band of the Kumeyaay Nation, Jamul Indian Village, and La Posta Band of Diegueño Mission Indians of the identification of human remains.</li> <li>▪ The immediate vicinity where the Native American human remains are located is not to be damaged or disturbed by further development activity until consultation with the MLD regarding their recommendations as required by Public Resources Code Section 5097.98 has been conducted.</li> <li>▪ Public Resources Code §5097.98, CEQA §15064.5 and Health &amp; Safety Code §7050.5 shall be followed in the event that human remains are discovered.</li> <li>○ <b>Final Monitoring Report.</b> Upon completion of earth-disturbing activities (e.g., grading, trenching, etc.), the Project Archaeologist shall prepare a monitoring report identifying whether resources were encountered.</li> <li>▪ <b>No Resources Encountered.</b> If no archaeological resources are encountered during earth-disturbing activities, then a final Negative Monitoring Report substantiating that earth-disturbing activities are completed and no cultural resources were encountered shall be submitted. Archaeological monitoring logs showing the date and time that the monitor was on site and any comments from the Native American Monitor shall be included in the Negative Monitoring Report.</li> <li>▪ <b>Resources Encountered.</b> If archaeological resources were encountered during the earth disturbing activities, the Project Archaeologist shall provide an Archaeological Monitoring Report stating that the field monitoring activities have been completed, and that resources have been encountered. The report shall detail all cultural artifacts and deposits discovered during monitoring and the anticipated</li> </ul>		



Potential Significant Impact	Mitigation Measure	Timeframe of Mitigation	Monitoring, Enforcement, and Reporting Responsibility
	<p>time schedule for completion of the curation and/or repatriation phase of the monitoring.</p> <ul style="list-style-type: none"> <li>▪ A copy of the monitoring report shall be provided to the Director of General Services, South Coastal Information Center, and any culturally-affiliated tribe who requests a copy.</li> <li>▪ The Final Monitoring Report shall include: <ul style="list-style-type: none"> <li>▶ Department of Parks and Recreation Primary and Archaeological Site forms</li> <li>▶ Daily Monitoring Logs</li> <li>▶ Evidence that all cultural materials have been conveyed as follows: <ul style="list-style-type: none"> <li>➤ Evidence that all prehistoric materials collected during the archaeological monitoring program have been submitted to a San Diego or Imperial County curation facility or a culturally affiliated Native American Tribal curation facility that meets federal standards per 36 CFR Part 79, and, therefore, would be professionally curated and made available to other archaeologists/researchers for further study. The collections and associated records, including title, shall be transferred to the San Diego or Imperial County curation facility or culturally affiliated Native American Tribal curation facility and shall be accompanied by payment of the fees necessary for permanent curation. Evidence shall be in the form of a letter from the curation facility stating that the prehistoric archaeological materials have been received and that all fees have been paid.</li> </ul> </li> </ul> </li> </ul> <p style="text-align: center;">or</p> <p>Evidence that all prehistoric materials collected during the grading monitoring program have been</p>		

Potential Significant Impact	Mitigation Measure	Timeframe of Mitigation	Monitoring, Enforcement, and Reporting Responsibility
	<p>repatriated to a Native American group of appropriate tribal affinity and shall be accompanied by payment of the fees necessary, if required. Evidence shall be in the form of a letter from the Native American tribe to whom the cultural resources have been repatriated identifying that the archaeological materials have been received.</p> <p>➤ Historic materials shall be curated at a San Diego or Imperial County curation facility and shall not be curated at a Tribal curation facility or repatriated. The collections and associated records, including title, shall be transferred to the San Diego or Imperial County curation facility and shall be accompanied by payment of the fees necessary for permanent curation. Evidence shall be in the form of a letter from the curation facility stating that the historic materials have been received and that all fees have been paid.</p>		
<b>Impact V.c)</b> Would the project disturb any human remains, including those interred outside of formal cemeteries?	Implement mitigation measure <b>MM-CUL-1</b> .	During project construction activities	County of San Diego Department of General Services
<b>Hydrology and Water Quality</b>			
<b>Impact X.c.iv)</b> Impede or redirect flood flows?	<p>The following are not mitigation measures, but are required project design features. Therefore, project design features are included in this MMRP to ensure compliance.</p> <p><b>PDF-HYD-1: Raise Finished Floor Elevation</b></p> <p>Prior to approval of final design plans, the County Department of Public Works shall verify that all project components located within the 100-year floodplain shall comply with the County of San Diego Flood Damage Prevention Ordinance, County Hydrology Manual, and County</p>	Prior to approval of final design plans; verified during and after construction	County Department of Public Works; County of San Diego Department of General Services

Potential Significant Impact	Mitigation Measure	Timeframe of Mitigation	Monitoring, Enforcement, and Reporting Responsibility
	<p>Hydraulic Design Manual, which includes raising the finished floor elevation of the site to one (1) foot above base flood elevation.</p> <p><b>PDF-HYD-2: Flood Fencing Types</b></p> <p>Flood fencing shall be either breakaway fencing or flow through fencing, as described below:</p> <p>Where flood fencing is provided along Old Highway 80, breakaway type fencing should be used where feasible. Flow-through fencing may be used along Old Highway 80 if drainage conditions warrant its use. However, if flood depths exceed 12 inches, breakaway type fencing (not flow through) must be used along Old Highway 80.</p> <p>Where flood fencing is provided elsewhere (not along Old Highway 80), either flow-through or breakaway fencing may be used.</p>		
<b>Impact X.d)</b> In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	Implement project design feature <b>PDF-HYD-1</b> and <b>PDF-HYD-2</b> .	Prior to approval of final design plans; verified during and after construction	County Department of Public Works; County of San Diego Department of General Services
<b>Tribal Cultural Resources</b>			
<p><b>Impact XVII.i)</b> Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:</p> <p>i. Listed or eligible for listing in the California Register of Historical</p>	Implement mitigation measure <b>MM-CUL-1</b> .	Prior to and during project construction activities	County of San Diego Department of General Services

Potential Significant Impact	Mitigation Measure	Timeframe of Mitigation	Monitoring, Enforcement, and Reporting Responsibility
Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)?			
<p><b>Impact XVII.ii)</b> Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:</p> <p>ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code §5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code §5024.1, the Lead Agency shall consider the significance of the resource to a California Native American tribe.</p>	Implement mitigation measure <b>MM-CUL-1</b> .	Prior to and during project construction activities	County of San Diego Department of General Services
<b>Wildfire</b>			
<b>Impact X.c.iv)</b> Impede or redirect flood flows?	<p>The following is not mitigation, but it is a required project design feature. Therefore, project design features are included in this MMRP to ensure compliance.</p> <p>Implement project design features <b>PDF-HYD-1</b> and <b>PDF-HYD-2</b>.</p>	Prior to approval of final design plans; verified during and after construction	County Department of Public Works; County of San Diego Department of General Services

# **ATTACHMENT B:**

## **Public Comments and Responses**

**Jacumba Fire Station No. 43 Project**  
**Jacumba, California**  
**SCH No.: 2024090644**

**Lead Agency:**

County of San Diego  
Department of General Services  
5560 Overland Avenue, Suite 2207  
San Diego, California 92123

**Preparers:**

Ascent Environmental  
2550 Fifth Avenue, Suite 640  
San Diego, CA 92103

and

Ridgeline Environmental  
6977 Navajo Rd., #416  
San Diego, CA 92119

**January 2025**





## **PUBLIC COMMENTS AND RESPONSES**

### **B1. BACKGROUND**

A Draft Initial Study/Mitigated Negative Declaration was prepared for the Jacumba Fire Station No. 43 Project in accordance with the California Environmental Quality Act (CEQA), the State CEQA Guidelines (Sections 15070 and 15072), and County of San Diego (County) CEQA guidelines and procedures. The Draft Initial Study concluded that the proposed project would not result in any significant unavoidable impacts and that all impacts would be reduced to less than significant with implementation of the mitigation measures identified.

The Draft Initial Study/Mitigated Negative Declaration was released for public and agency review from September 16, 2024 to October 16, 2024 and was available on the County's website at: [https://www.sandiegocounty.gov/content/sdc/general\\_services/CEQA.html](https://www.sandiegocounty.gov/content/sdc/general_services/CEQA.html). The County received a total of two (2) comment letters during the 30-day public review period.

Based on the comments received during the public review period of the Draft Initial Study/Mitigated Negative Declaration, minor revisions and clarifications were made to the Draft Initial Study. These minor revisions, which are indicated in strikeout for deletions and underline for additions, are intended to clarify or elaborate upon the findings in the Draft Initial Study and do not constitute a substantial revision of the Draft Initial Study. Furthermore, the minor clarifications would not alter the conclusions presented in the Draft Initial Study. These minor revisions and clarifications are provided in Attachment C, "Final CEQA Initial Study - Environmental Checklist Form."

### **B2. LIST OF PERSONS, ORGANIZATIONS, AND PUBLIC AGENCIES THAT COMMENTED ON THE DRAFT INITIAL STUDY**

Table 1 presents a list of the comment letters received on the Draft Initial Study/Mitigated Negative Declaration during the public review period, including the numerical designation for each comment letter, the author of the comment letter, and the date of the comment letter. Comment letters and specific comments were numbered for reference purposes. A copy of the comment letter along with detailed responses to those comments is provided on the pages that follow.

**TABLE 1 LIST OF COMMENT LETTERS**

<b>Letter No.</b>	<b>Commenter</b>	<b>Date</b>
<b>AGENCIES</b>		
A1	California Department of Transportation	10/15/2024
<b>ORGANIZATIONS</b>		
O1	Manzanita Band of the Kumeyaay Nation	10/10/2024

CALIFORNIA STATE TRANSPORTATION AGENCY

GAVIN NEWSOM, GOVERNOR

## California Department of Transportation

DISTRICT 11  
4050 TAYLOR STREET, MS-240  
SAN DIEGO, CA 92110  
(619) 709-5152 | FAX (619) 688-4299 TTY 711  
[www.dot.ca.gov](http://www.dot.ca.gov)



Letter  
A1

October 15, 2024

11-SD-8  
PM R73.768  
Jacumba Fire Station No.43 Project  
MND/SCH#2024090644

Mr. Marcus Lubich  
Project Manager  
County of San Diego  
Department of General Services  
5560 Overland Avenue, Suite 410  
San Diego, CA 92123

Dear Mr. Lubich:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Mitigated Negative Declaration (MND) on the Jacumba Fire Station No. 43 project located on near Interstate 8 (I-8) in Jacumba. The mission of Caltrans is to provide a safe and reliable transportation network that serves all people and respects the environment. The Local Development Review (LDR) Program reviews land use projects and plans to ensure consistency with our mission and state planning priorities.

Safety is one of Caltrans' strategic goals. Caltrans strives to make the year 2050 the first year without a single death or serious injury on California's roads. We are striving for more equitable outcomes for the transportation network's diverse users. To achieve these ambitious goals, we will pursue meaningful collaboration with our partners. We encourage the implementation of new technologies, innovations, and best practices that will enhance the safety on the transportation network. These pursuits are both ambitious and urgent, and their accomplishment involves a focused departure from the status quo as we continue to institutionalize safety in all our work.

Caltrans is committed to prioritizing projects that are equitable and provide meaningful benefits to historically underserved communities, to ultimately improve transportation accessibility and quality of life for people in the communities we serve.

We look forward to working with the County of San Diego in areas where the County and Caltrans have joint jurisdiction to improve the transportation network and

A1-1

"Provide a safe and reliable transportation network that serves all people and respects the environment"

Mr. Marcus Lubich, Project Manager  
October 15, 2024  
Page 2

connections between various modes of travel, with the goal of improving the experience of those who use the transportation system.

A1-1  
cont.

Caltrans has the following comments:

#### **Land Use and Smart Growth**

Caltrans recognizes there is a strong link between transportation and land use. Development can have a significant impact on traffic and congestion on State transportation facilities. In particular, the pattern of land use can affect both local vehicle miles traveled and the number of trips. Caltrans supports collaboration with local agencies to work towards a safe, functional, interconnected, multi-modal transportation network integrated through applicable "smart growth" type land use planning and policies.

A1-2

The County of San Diego should continue to coordinate with Caltrans to implement necessary improvements at intersections and interchanges where the agencies have joint jurisdiction.

#### **Hauling**

Caltrans has discretionary authority with respect to highways under its jurisdiction and may, upon application and if good cause appears, issue a special permit to operate or move a vehicle or combination of vehicles or special mobile equipment of a size or weight of vehicle or load exceeding the maximum limitations specified in the California Vehicle Code. The Caltrans Transportation Permits Issuance Branch is responsible for the issuance of these special transportation permits for oversize/overweight vehicles on the State Highway network. Additional information is provided online at: <http://www.dot.ca.gov/trafficops/permits/index.html>

A1-3

#### **Environmental**

Caltrans welcomes the opportunity to be a Responsible Agency under the California Environmental Quality Act (CEQA), as we have some discretionary authority of a portion of the project that is in Caltrans' R/W through the form of an encroachment permit process. We look forward to the coordination of our efforts to ensure that Caltrans can adopt the alternative and/or mitigation measure for our R/W.

A1-4

An encroachment permit will be required for any work within the Caltrans' R/W prior to construction. As part of the encroachment permit process, the applicant must provide approved final environmental documents for this project, corresponding technical studies, and necessary regulatory and resource agency permits. Specifically, CEQA determination or exemption. The supporting documents must address all environmental impacts within the Caltrans' R/W and address any impacts from avoidance and/or mitigation measures.

Mr. Marcus Lubich, Project Manager  
October 15, 2024  
Page 3

We recommend that this project specifically identifies and assesses potential impacts caused by the project or impacts from mitigation efforts that occur within Caltrans' R/W that includes impacts to the natural environment, infrastructure including but not limited to highways, roadways, structures, intelligent transportation systems elements, on-ramps and off-ramps, and appurtenant features including but not limited to fencing, lighting, signage, drainage, guardrail, slopes and landscaping. Caltrans is interested in any additional mitigation measures identified for the project's draft Environmental Document.

A1-4  
cont.

#### **Right-of-Way**

- Per Business and Profession Code 8771, perpetuation of survey monuments by a licensed land surveyor is required, if they are being destroyed by any construction.
- Any work performed within Caltrans' R/W will require discretionary review and approval by Caltrans and an encroachment permit will be required for any work within the Caltrans' R/W prior to construction.

Additional information regarding encroachment permits may be obtained by visiting the website at <https://dot.ca.gov/programs/traffic-operations/ep>. Projects with the following:

A1-5

- require a Caltrans Encroachment Permit.
- have completed the Caltrans Local Development Review (LDR) process.
- have an approved environmental document.

are to submit documents for Quality Management Assessment Process (QMAP) process via email to [D11.QMAP.Permits@dot.ca.gov](mailto:D11.QMAP.Permits@dot.ca.gov). Early coordination with Caltrans is strongly advised for all encroachment permits.

If you have any questions or concerns, please contact Mark McCumsey, LDR Coordinator, at (619) 985-4957 or by e-mail sent to [mark.mccumsey@dot.ca.gov](mailto:mark.mccumsey@dot.ca.gov).

Sincerely,

*Kimberly D. Dodson*

KIMBERLY D. DODSON, GISP  
Branch Chief  
Local Development Review

**Letter A1 California Department of Transportation  
Kimberly D. Dodson, Branch Chief, Local Development  
Review**

**Response to Comment A1-1:**

The commenter thanks the County for being included in the environmental review process for the project and summarizes the California Department of Transportation's (Caltrans) mission to provide a safe and reliable transportation network and commitment to prioritizing projects that are equitable and provide meaningful benefits to historically underserved communities. The commenter states that Caltrans looks forward to working with the County of San Diego in areas where the County and Caltrans have joint jurisdiction.

The County appreciates Caltrans' interest in the proposed project. The comment is an introductory comment that does not raise any environmental issues regarding the adequacy of the Draft IS/MND. Responses to specific comments are provided below.

**Response to Comment A1-2:**

The commenter states that there is a strong link between transportation and land use. The commenter states that Caltrans supports collaboration with local agencies to work towards a safe, functional, interconnected, multi-modal transportation network integrated through applicable "smart growth" type land use planning and policies. The commenter states that the County should continue to coordinate with Caltrans to implement necessary improvements at intersections and interchanges where the agencies have joint jurisdiction.

The County will continue to coordinate with Caltrans in areas where their jurisdictions overlap. The comment does not raise any environmental issues regarding the adequacy of the Draft IS/MND. Therefore, no further response is required.

**Response to Comment A1-3:**

The commenter states that Caltrans has discretionary authority with respect to highways under its jurisdiction and issues a special permit to operate or move a vehicle or combination of vehicles or special mobile equipment of a size or weight of vehicle or load exceeding the maximum limitations specified in the California Vehicle Code.

The comment is informational in nature and does not raise any environmental issues regarding the adequacy of the Draft IS/MND. The County will obtain all necessary permits for the project, including a special permit from Caltrans, if required.

**Response to Comment A1-4:**

The commenter indicates that Caltrans has some discretionary authority over a portion of the project that is in Caltrans' right-of-way through the encroachment permit process. The commenter states that an encroachment permit will be required for any work within the Caltrans' right-of-way prior to construction and that the applicant must provide approved final environmental documents for this project, corresponding technical studies, and necessary regulatory and resource agency permits as part of the encroachment permit process. The commenter recommends that the project specifically identifies and assesses potential impacts caused by the project or impacts from mitigation efforts that occur within Caltrans' right-of-way that includes impacts on the natural environment, infrastructure, and appurtenant features. The commenter further states that Caltrans is interested in any additional mitigation measures identified for the project's draft Environmental Document.

The County acknowledges the process required for work conducted with Caltrans' right-of-way. The proposed project is located on an approximately 2.77-acre portion of a 5-acre property bounded by Old Highway 80 immediately to the south. Implementation of the proposed project would not require the construction, redesign, or alteration of any public roadways other than the construction of ingress/egress access driveways along Old Highway 80 that would allow access to the proposed project site. Although the project would encroach onto Old Highway 80 for the construction of new ingress/egress access driveways, this highway is a County maintained roadway. The project would not result in any modifications to any other roadways, including those in Caltrans' right-of-way. Therefore, the project would not be subject to Caltrans' encroachment permit process. No changes to the Draft IS/MND are required in response to this comment.

**Response to Comment A1-5:**

The commenter summarizes the requirements of Business and Profession Code 8771 related to survey monuments and states that any work within Caltrans' right-of-way will require discretionary review and an encroachment permit. The commenter states that projects requiring an encroachment permit, have completed the Caltrans Local Development Review process, and have an approved environmental document are required to submit documents for Caltrans' Quality Management Assessment Process.

As noted under the response to comment A1-5, the project would not result in any modifications to or require encroachment on any Caltrans' facilities. As such, the project would not be subject to Caltrans' encroachment permit process or Quality Management Assessment Process. In addition, the project would not result in the destruction of any survey monuments. No changes to the Draft IS/MND are required in response to this comment.



Letter  
O1

## Manzanita Band of the Kumeyaay Nation

October 10, 2024

County of San Diego  
Attn: Marcus Lubich  
Department of General Services  
5560 Overland Avenue, Suite 410  
San Diego, CA 92123-1239

Dear Mr. Lubich,

RE: Jacumba Fire Station No. 43  
Draft Mitigated Negative Declaration

The Manzanita Band of the Kumeyaay Nation ("Tribe"), also known as the Manzanita Band of Diegueno Mission Indians, is a federally recognized Self-Governance Indian Tribe that operates pursuant to its constitution and Bylaws adopted on July 12, 1975 pursuant to the Indian Reorganization Act of 1934 and approved by the Commissioner of Indian Affairs on January 9, 1976, and possesses inherent powers of self-governance with duties, rights and responsibilities, and with power, authority, and jurisdiction over the lands governed by the Manzanita Tribe and with interest and standing over lands that are within the Traditional Territory of the Kumeyaay People.

The Manzanita Tribe is one of twelve Tribes of the Kumeyaay Nation whose aboriginal territory extends from the Pacific Ocean to the desert lands of the Colorado River and approximately seventy-five miles north and south of the international border, adopted by the State of California through Assembly Joint Resolution No. 60 on the 29<sup>th</sup> day of August 2002. The Manzanita Tribe is also traditionally and culturally affiliated with cultural resources now submerged in the Pacific Ocean from three to seventeen kilometers further westward than today's coastline including the islands off the coast and as far as we could travel to harvest marine resources. Therefore, the Manzanita Tribe also strives to protect known and unknown cultural resources within the aboriginal territory.

The Manzanita Tribe has reviewed the Notice of Intent to Adopt a Mitigated Negative Declaration, the Draft Mitigated Negative Declaration, and Appendix B. Archaeological

O1-1

**PO Box 1302 Boulevard California 91905 Phone (619) 766-4930 Fax (619) 766-4957**



Survey Report September 2024 for the proposed new Jacumba Fire Station No. 43. In addition, the Manzanita Tribe has requested Government to Government Consultation, has met with County staff and participated in a site visit. The Manzanita Tribe is providing the following information, comments and requests:

O1-1  
cont.

1. The Manzanita Tribe is particularly interested in the Jacumba area for several reasons. First the Jacumba area is critically important to the Kumeyaay People's history and spirituality, which is well documented and evidenced by the many protection districts in the area and includes the healing waters of the hot springs, the many sacred sites in the area, the archaeological resources, the significant plant gathering sites, trade routes, and cremation sites. All of these significant cultural resources have been adversely affected in the past and the Tribe wants to make sure that they are protected for our future generations. Secondly the Jacumba area is the home of the Aswayo Clan as documented in "Southern Diegueno Customs" by Leslie Spier and all of the modern-day members of the Aswayo Clan are enrolled in the Manzanita Tribe. The Manzanita Tribe does want to protect and strengthen the Clan's, The Tribe's, and the Kumeyaay People's connection to the Jacumba Area.

O1-2

2. Comments on the Draft Mitigated Negative Declaration
  - a. Section 2 Required Mitigation Measures A. Biological Resources
    - i. MM-BIO-1 – The County should consider consulting with the Manzanita Tribe and other Kumeyaay Tribes to develop Resource Management Plans for Culturally Significant Plants in the Jacumba Area to ensure continued preservation, management, and availability of Culturally Significant Plants to Kumeyaay People.
  - b. Section 2 Required Mitigation Measures B. Cultural Resources
    - i. MM-CUL-1 – The Tribe agrees that archaeological and Native American Monitoring Plans need to be developed for the project, in addition there should be a Discovery Plan and a NAGPRA Plan as well.
    - ii. Pre-Construction – the Monitoring Plan should outline that monitors should be Tribally Approved by the Participating Tribes and rotated weekly through the Participating Tribes.
    - iii. Construction – Monthly Reporting – The Tribe requests weekly reporting and include the Participating Tribes when sending the reports. The Tribe also wants to clarify that earth-disturbing activities include not only grading but also include trenching for water and utility lines and any other activities where earth is moved.
    - iv. Construction – If Cultural Resources are Identified during construction monitoring – Point 7 – The Tribe requests all isolates, artifacts or deposits be fully documented and curated as all of these deposits cumulatively contribute to the significance of the Jacumba Area and many have been destroyed or taken in the past. Point 8 – When modifying or updating the Research Design, Discovery Plan,

O1-3

O1-4

O1-5

O1-6

O1-7



and/or the Data Recovery Plan the County should consult with the Manzanita Tribe and other participating Tribes.	O1-7 cont.
v. Construction – Human Remains – The Manzanita Tribe and the other Participating Tribes should be notified and consulted with as well.	O1-8
vi. Rough Grading Monitoring Report – Point 3 – The Manzanita Tribe and the other Participating Tribes should be sent a copy of all reports and supporting documentation.	O1-9
vii. Final Grading – Final Report – Point 3 – the County should consult with the Manzanita Tribe and the other Participating Tribes on the identification and selection of a curation facility for all of the collected Cultural Resources. Last Point in that section – A copy of the Final Report should be sent to the Manzanita Tribe and the other Participating Tribes.	O1-10
3. Comments on Appendix B Archaeological Survey Report September 2024	
a. Cultural Setting – Page 6 – the Manzanita Tribe is surprised to read that the analysis in this section includes does not include a discussion of the recent discoveries and information that was documented just down the road at the ECO Substation where the evidence confirmed what Kumeyaay Elders have said all along, that the People of this area have always been the same people the Kumeyaay People and yes we embraced technological advancements over the past twelve millennia, at the least, just as any other civilization throughout the world has.	O1-11
b. CA-SDI-8072 – Page 14 – Although Dudek made the determination that this site had a low potential for significant buried deposits or culturally sensitive materials and recommended that SDI-8027 was not significant the Manzanita Tribe asserts that all sites are significant and contribute to the collective and overall significance of the Tribal Cultural Landscape in the Jacumba Region and there is evidence in many different areas in the Jacumba Region that have revealed buried deposits so the Manzanita Tribe is insisting on the development of a Discovery Plan.	O1-12
c. Jacumba Valley Archaeological District (JVAD) – Page 15 – How can the County assist in the efforts to have this District approved?	O1-13
d. 1.3.3 – Traditional Cultural Properties / Tribal Cultural Resources – Page 18 – The Manzanita Tribe asserts and believes that the Jacumba Region has many critically significant Kumeyaay Traditional Cultural Properties and is a critically significant Kumeyaay Traditional Cultural Landscape that needs all of the available protections for its preservation for future generations of the Kumeyaay People.	O1-14
e. 4.1.1 – Archaeological Sites – Page 25 – Again the Manzanita Tribe asserts that all sites and resources including CA-SDI-8072 are connected to and contribute to the significance of the Kumeyaay Traditional Cultural Landscape in the Jacumba Region.	O1-15
f. 4.1.2 – Tribal Cultural Resources – Page 26 – The Manzanita Tribe agrees with the Campo Tribe in their assertion of the importance of the viewsheds in the Jacumba Region and their connection to the Kumeyaay Traditional Cultural	O1-16

Landscape in the Jacumba Region and this connection includes the unseen energy connection between the sacred sites and the water in the Jacumba Region.

O1-16  
cont.

- g. 5.1 Mitigable Impacts – Page 27 – a. 1. – The Manzanita Tribe would like to see Native American Monitors should be Tribally Approved and Monitors be rotated weekly through the Participating Tribes – a. 5. – the Manzanita Tribe would like notification be sent to the Participating Tribes of all discovered resources as outlined by a Discovery Plan that the Participating Tribes have been consulted on – Page 28 – a. 6. – the Tribe disagrees with this section and asserts that all isolates and deposits or resources be documented and curated – a. 7. – the Manzanita Tribe is asking the County to develop a Discovery Plan that would outline the steps, notifications, consultation, and reports that are required if deposits or resources are found on site – a. 8. – the Manzanita Tribe is asking the County to have a NAGPRA Plan that would outline immediate notification to the Participating Tribes – a. 10. – the Manzanita Tribe wants consultation on the identification of and selection of the curation facility and suggests including the other Participating Tribes on this consultation – a. 11. – Status Reports – the Manzanita Tribe is asking for Weekly Status Reports for this project – a. 12. – this report should be sent the Manzanita Tribe and the other Participating Tribes as well – a. 13. – this letter notification should be sent to the Manzanita Tribe and the other Participating Tribes as well.

O1-17

4. The Manzanita Tribe is requesting copies of all of the attachments including confidential attachments, cultural resource study, site records and/or other documents for this Declaration.

O1-18

The Manzanita Tribe requests to be kept up to date on developments on this project as it moves forward and when there are any new findings whether isolates, human remains, or any artifacts.

The Manzanita Tribe reserves the right to make additional comments and request further consultation on this project.

O1-19

Should you have any questions or need any further information you can contact the Manzanita Tribal Historic Preservation Officer Veronica Santos at (619)766-4930x1004 or at [veronicasantos@manzanita-nsn.gov](mailto:veronicasantos@manzanita-nsn.gov).

Respectfully,



for Angela Elliott Santos, Tribal Chairman  
Manzanita Band of the Kumeyaay Nation

## **Letter O1 Manzanita Band of the Kumeyaay Nation Angela Elliott Santos, Tribal Chairman**

### **Response to Comment O1-1:**

The commenter states that the Manzanita Band of the Kumeyaay Nation (Tribe), also known as the Manzanita Band of the Diegueno Mission Indians, is as federally recognized Self-Governance Indian Tribe and provides a description of the Tribe's aboriginal territory. The commenter states that the Manzanita Tribe has reviewed the Notice of Intent to Adopt a Mitigated Negative Declaration, the Draft Mitigated Negative Declaration, and Archaeological Survey report for the proposed project. The commenter also states that the Manzanita Tribe has requested Government to Government Consultation, met with County Staff, and participated in a site visit.

The County appreciates the Manzanita Tribe's interest in and input on the proposed project and its potential effect on Tribal Cultural Resources (TCRs). The comment is an introductory comment that does not raise any environmental issues regarding the adequacy of the Draft IS/MND. Responses to specific comments are provided below.

### **Response to Comment O1-2:**

The commenter describes the reasons for the Manzanita Tribe's interest in the Jacumba area and states that the Tribe wants to ensure that significant cultural resources are protected for future generations. The commenter states that the Jacumba area is home to the Aswayo Clan and that the Manzanita Tribe wants to protect and strengthen the Aswayo Clan's, the Tribe's, and the Kumeyaay People's connection to the Jacumba area.

The County recognizes and acknowledges the cultural significance of the Jacumba area to the Manzanita Tribe. The comment is informational in nature and does not raise any environmental issues regarding the adequacy of the Draft IS/MND. Therefore, no further response is required.

### **Response to Comment O1-3:**

The commenter requests revisions to Mitigation Measure MM-BIO-1 to include language that the County consider consulting with the Manzanita Tribe and other Kumeyaay Tribes to develop Resource Management Plans for Culturally Significant Plants in the Jacumba area to ensure continued preservation, management, and availability of Culturally Significant Plants to Kumeyaay People.

As provided in the project's Biological Resources Letter Report (Appendix A1) and on page 41 of the Initial Study (Attachment C to the Final MND), no special status species were observed during the field survey. Additionally, no suitable habitat for special status plant species occurs on the project site. Furthermore, opportunistic surveys for target list sensitive plant species were performed before and after focused surveys for burrowing owl and Quino checkerspot butterfly to definitively determine their absence. No sensitive plant species were observed. Historical agricultural use and grading and lack of

connectivity to natural source populations likely precludes special status plant species, including narrow endemics, from occurring within the project site. Moreover, no populations of special status plant species are known to occur immediately adjacent to the project site where they could be subjected to fugitive dust and/or encroachment upon by invasive and/or exotic landscape ornamental species. Therefore, potential direct and indirect impacts on special-status plant species would be less than significant.

Although the proposed project does not require a Resource Management Plan for existing plants that would be affected from earth-disturbing activities, MM-CUL-1 has been updated to include consultation with participating Tribes to determine if Culturally Significant Plants to the Kumeyaay People are present that could then be incorporated into the final landscape palette for the project. Please see the revisions and clarifications provided in the Final IS/MND.

**Response to Comment O1-4:**

The commenter agrees with the requirements in Mitigation Measure MM-CUL-1 for archaeological and Native American monitoring plans and suggests that there should also be a Discovery Plan and NAGPRA Plan as well.

Mitigation Measure MM-CUL-1 has been revised and clarified to include language requiring a Monitoring and Discovery Plan that includes State requirements for discovery of human remains. However, because there is no federal nexus, NAGRPA would not be applicable to the proposed project. Please see the revisions and clarifications provided in the Final IS/MND.

**Response to Comment O1-5:**

The commenter suggests that the Monitoring Plan included in Mitigation Measure MM-CUL-1 should state that monitors should be Tribally approved by the participating Tribes and rotated weekly through the participating Tribes.

Mitigation Measure MM-CUL-1 has been revised and clarified to include language requiring Native American monitors to be approved by the participating Tribes. In addition, MM-CUL-1 has been further revised to indicate that if multiple Kumeyaay Tribes are interested in participating in the monitoring effort, a daily/weekly rotation shall be developed to allow equal time for observation. Please see the revisions and clarifications provided in the Final IS/MND.

**Response to Comment O1-6:**

The commenter requests that construction monitoring reports be submitted weekly rather than monthly as currently stated in Mitigation Measure MM-CUL-1 and that the reports be provided to participating Tribes as well. The commenter also requests clarification that earth-disturbing activities include not only grading but also trenching for water and utility lines and any other activities where earth is moved.

In response to Comment O1-6, Mitigation Measure MM-CUL-1 has been updated. As revised, the County will provide weekly notification and summaries to participating Tribes. However, it is the County's practice to have construction monitoring reports prepared monthly and, therefore, reports would continue monthly. In addition, Mitigation Measure MM-CUL-1 has been revised and clarified that all earth-disturbing activities would include trenching for utilities, installation of BMPs and fencing, and other activities where earth is moved. Please see the revisions and clarifications provided in the Final IS/MND.

**Response to Comment O1-7:**

The commenter requests that all isolates, artifacts, or deposits discovered during construction monitoring to be fully documented and curated because all of these deposits cumulatively contribute to the significance of the Jacumba area and many have been destroyed or taken in the past. The commenter also requests that the County consult with the Manzanita Tribe and other participating Tribes when modifying or updating the Research Design, Discovery Plan, and/or Data Recovery Plan included in Mitigation Measure MM-CUL-1.

Mitigation Measure MM-CUL-1 has been revised and clarified to include the language requested in the comment. Please see the revisions and clarifications provided in the Final IS/MND.

**Response to Comment O1-8:**

The commenter requests that the Manzanita Tribe and other participating Tribes be notified and consulted with if any human remains are discovered per Mitigation Measure MM-CUL-1.

Mitigation Measure MM-CUL-1 has been revised and clarified to include the language requested in the comment. Please see the revisions and clarifications provided in the Final IS/MND.

**Response to Comment O1-9:**

The commenter requests that the Manzanita Tribe and other participating Tribes be sent a copy of all reports and supporting documentation per the "Rough Grading – Monitoring Report" requirements in Mitigation Measure MM-CUL-1.

Please note that MM-CUL-1 already specifies that "[a] copy of the monitoring report shall be provided to...any culturally-affiliated tribe who requests a copy." Other clarifications have been made to Mitigation Measure MM-CUL-1. Pursuant to the mitigation measure, the County will provide a copy of the monitoring report and any supporting documentation

**Response to Comment O1-10:**

The commenter requests that the County consult with the Manzanita Tribe and other participating Tribes on the identification and selection of a curation facility for all of the collected cultural resources and that a copy of the Final Grading Report be provided to the Manzanita Tribe and other participating Tribes per Mitigation Measure MM-CUL-1.

Mitigation Measure MM-CUL-1 has been revised and clarified to include the language requested in the comment. Please see the revisions and clarifications provided in the Final IS/MND.

**Response to Comment O1-11:**

The commenter expresses surprise that the analysis in the Cultural Setting of the Archaeological Survey Report does not include a discussion of the recent discoveries and information documented at the ECO Substation.

Please see the update to the Archaeological Survey Report on page 9, which now includes a discussion of the recent discoveries and information documented at the East County Substation Project site.

**Response to Comment O1-12:**

The commenter states that although Dudek made the determination that site CA-SDI-8072 is not significant, the Manzanita Tribe asserts that all sites are significant and contribute to the collective and overall significance of the Tribal Cultural Landscape in the Jacumba region and there is evidence in many different areas in the region that have revealed buried deposits. Based on this, the Manzanita Tribe requests development of a Discovery Plan.

Please see the update to the Archaeological Survey Report, specifically under Section 3.1, Native American Participation, which now states the Manzanita Tribe's belief that that all sites are significant and contribute to the collective and overall significance of the Tribal Cultural Landscape in the Jacumba region and there is evidence in many different areas in the region that have revealed buried deposits.

In addition, mitigation measure MM-CUL-1 has been clarified to include a Monitoring and Discovery Plan.

**Response to Comment O1-13:**

The commenter references page 15 of the Archaeological Survey Report and asks how the County can assist in the efforts to have the Jacumba Valley Archaeological District (JVAD) approved.

The Jacumba Valley Archaeological District was approved in 2013. Please see page 15 of the project's Archaeological Survey Report (Appendix B). The Jacumba Valley Archaeological District is not listed but has been determined eligible for both the California and National Registers. The County can assist with placement on the Local

Register but listing to the California or National Register would need to be completed by a consultant. Also, listing to the Local Register would require all property owners to be in agreement.

**Response to Comment O1-14:**

The commenter references Section 1.3.3, Traditional Cultural Properties/Tribal Cultural Resources, page 18, and indicates that the Manzanita Tribe asserts and believes that the Jacumba region has many critically significant Kumeyaay Traditional Cultural Properties and is a critically significant Kumeyaay Traditional Cultural Landscape that needs all available protections for its preservation for future generations of the Kumeyaay People.

Please see the update to the Archaeological Survey Report, specifically under Section 3.1, Native American Participation, which now states the Manzanita Tribe's belief that the Jacumba region has many critically significant Kumeyaay Traditional Cultural Properties and is a critically significant Kumeyaay Traditional Cultural Landscape that needs all available protections for its preservation for future generations of the Kumeyaay People.

**Response to Comment O1-15:**

The commenter references Section 4.1.1, Archaeological Sites, page 25, and states that the Manzanita Tribe asserts that all sites and resources including CA-SDI-8072 are connected to and contribute to the significance of the Kumeyaay Traditional Cultural Landscape in the Jacumba region.

Please see the update to the Archaeological Survey Report, specifically under Section 3.1, Native American Participation, which now states the Manzanita Tribe's belief that all sites and resources including CA-SDI-8072 are connected to and contribute to the significance of the Kumeyaay Traditional Cultural Landscape in the Jacumba region.

**Response to Comment O1-16:**

The commenter references Section 4.1.2, Tribal Cultural Resources, page 26, and indicates support for the Campo Tribe's assertion of the importance of viewsheds in the Jacumba Region, emphasizing their connection to the Kumeyaay Traditional Cultural Landscape, including the unseen energy linking sacred sites and water in the area.

Please see the update to the Archaeological Survey Report, specifically under Section 3.1, Native American Participation, which now includes a statement that the Manzanita Tribe supports the Campo Tribe's assertion of the importance of viewsheds in the Jacumba Region, emphasizing their connection to the Kumeyaay Traditional Cultural Landscape, including the unseen energy linking sacred sites and water in the area.

**Response to Comment O1-17:**

The commenter references Section 5.1, Mitigable Impacts, which has been clarified as Section 5, Management Considerations – Mitigation and Design Considerations, Section 5.1, Cultural Resources, on page 29. The commenter requests Tribally approved Native American monitors be rotated weekly among Participating Tribes and that tribes be notified of discovered resources per a consulted Discovery Plan. The commenter states that all resources, isolates, and deposits should be documented and curated and asks the County to develop a NAGPRA plan for immediate tribal notification. The commenter also requests consultation on selecting a curation facility, weekly status reports, and notifications be sent to all Participating Tribes.

Please see the update to the Archaeological Survey Report, specifically under Section 5, Mitigable Impacts, which modifies the Archaeological and Native American Monitoring mitigation measure to include Tribally approved Native American monitors rotated regularly (e.g., daily or weekly) among Participating Tribes, notification of participating tribes of discovered resources per the Monitoring and Discovery Plan, documentation and curation of resources (including isolates and deposits), onsite reinterment (if appropriate), or repatriation, consultation with participating Tribes on selecting the appropriate onsite location or curation facility, and weekly notifications and summaries of activities and results to be shared with participating tribes. Because the project does not occur on Federal or Tribal land, NAGPRA does not apply.

**Response to Comment O1-18:**

The commenter requests copies of all attachments, including confidential ones, cultural resource studies, site records, and related documents for the MND.

In addition to the Archaeological Survey Report that was circulated with the MND for public review, the County will provide the Manzanita Tribe with copies of all attachments, including confidential ones, cultural resource studies, site records, and related documents for the MND.

**Response to Comment O1-19:**

The commenter requests updates on the project's progress and any new findings, such as artifacts or remains. The commenter indicates that they reserve the right to provide further comments and request additional consultation. The comment concludes with the commenter providing their contact information.

The County appreciates the Manzanita Tribe's participation and input in the planning process for the Jacumba Fire Station No. 43 project.



# **ATTACHMENT C:**

## **Final CEQA Initial Study**

**Jacumba Fire Station No. 43 Project**  
**Jacumba, California**  
**SCH No.: 2024090644**

**Lead Agency:**

County of San Diego  
Department of General Services  
5560 Overland Avenue, Suite 2207  
San Diego, California 92123

**Preparers:**

Ascent Environmental  
2550 Fifth Avenue, Suite 640  
San Diego, CA 92103

and

Ridgeline Environmental  
6977 Navajo Rd., #416  
San Diego, CA 92119

**January 2025**





**GENERAL SERVICES**

5560 OVERLAND AVENUE, SUITE 410, SAN DIEGO, CALIFORNIA 92123  
(858) 694-2338

**MARKO MEDVED, PE, CEM**  
DIRECTOR

**NICOLE ALEJANDRE**  
ASSISTANT DIRECTOR

Draft IS/MND: September 16, 2024; Final IS/MND: January 2025

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

1. Title: Jacumba Fire Station No. 43
2. Lead agency name and address:  
County of San Diego, Department of General Services  
5560 Overland Avenue, Suite 410  
San Diego, CA 92123
3. a. Contact: Marcus Lubich, Environmental Project Manager  
b. Phone number: (858) 414-4593  
c. E-mail: [Marcus.Lubich@sdcounty.ca.gov](mailto:Marcus.Lubich@sdcounty.ca.gov)
4. Project location:  
The proposed fire station would be developed on an approximately 2.77-acre portion (project site or project boundary) of a 5-acre property. The project site is located at 44850 Old Highway 80 in the unincorporated community of Jacumba, which is situated in southeastern San Diego County, bordering Mexico along its northern perimeter. The project site is located approximately 0.4-mile north of the U.S. - Mexico International border. Primary access to the project site is provided by Old Highway 80, which forms the site's southerly boundary. A regional location map is provided in Figure 1 and a vicinity map is shown in Figure 2.
5. Project sponsor's name and address:  
County of San Diego, Department of General Services  
5560 Overland Avenue, Suite 410  
San Diego, CA 92123
6. General Plan: Village  
Community Plan: Mountain Empire Subregional Plan  
Land Use Designation: Specific Plan Area (SPA)  
Density: N/A  
Floor Area Ratio (FAR): N/A
7. Zoning  
Use Regulation: S88 – Specific Planning Area  
Minimum Lot Size: N/A  
Special Area Regulation: C – Airport Land Use Compatibility Plan Area
8. Description of project: See below.

## PROJECT OVERVIEW

The County of San Diego Department of General Services (DGS) is proposing to construct a new approximately 8,500 square foot fire station on an approximately 2.77-acre site (portion of APN 660-150-18-00) in the unincorporated community of Jacumba. The proposed fire station would replace the existing Jacumba fire station located at 1255 Jacumba Street, Jacumba, CA 91934 (APN 660-053-01-00). The new fire station would be identified by the same station number (i.e., Fire Station No. 43) and would have the same service area as the existing Jacumba Fire Station. The new fire station would be under the jurisdiction of the San Diego County Fire Protection District (San Diego County Fire). However, the station would be operated in cooperation with the California Department of Forestry & Fire Protection (CAL FIRE), who would be contracted by San Diego County Fire to provide fire protection and emergency medical services.

## PROJECT LOCATION

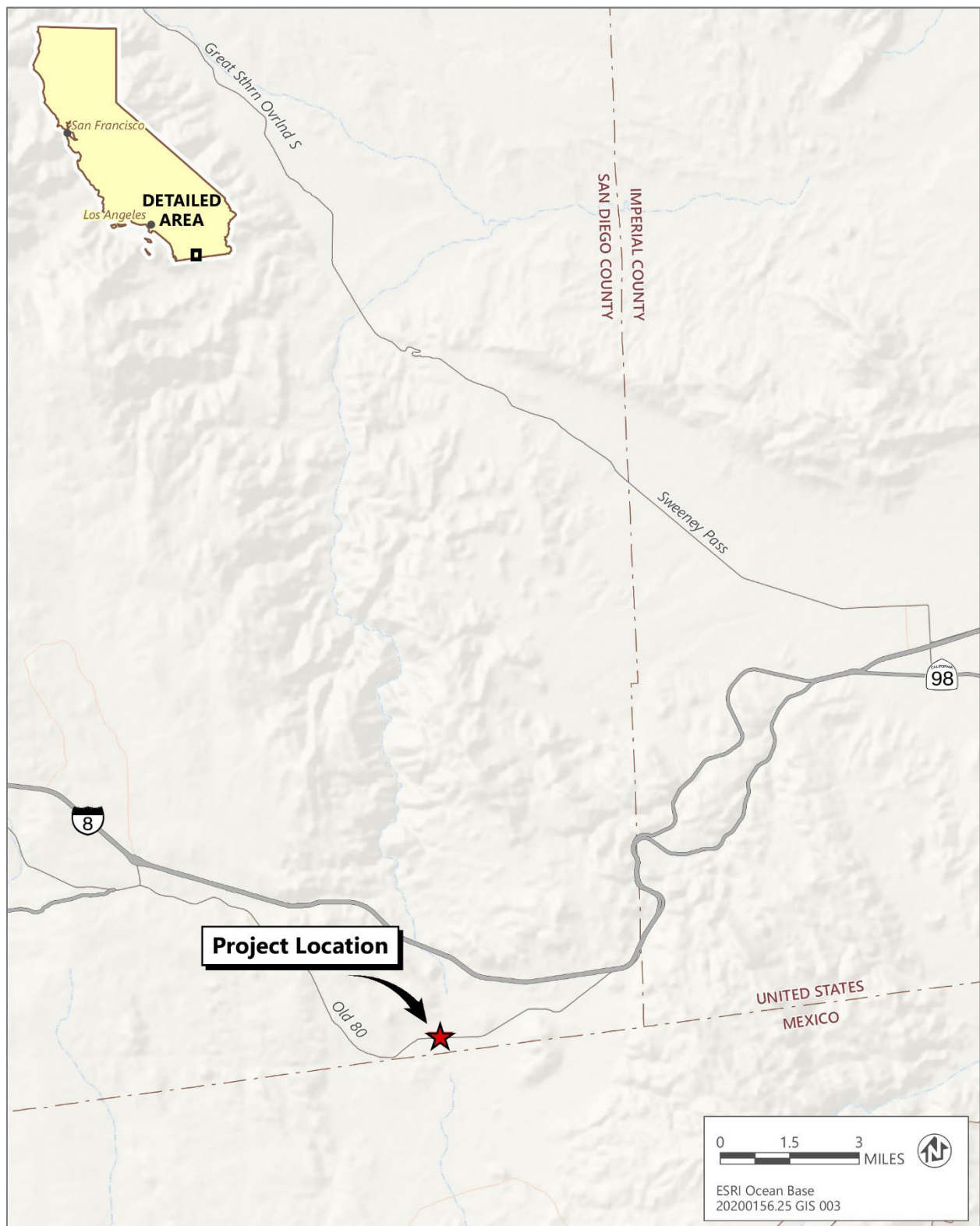
The proposed fire station would be developed on an approximately 2.77-acre portion (project site or project boundary) of a 5-acre property at 44850 Old Highway 80 in the unincorporated community of Jacumba, which is situated in southeastern San Diego County. The project site is located approximately 0.4-mile north of the U.S. - Mexico International border and is situated immediately east of development located within the community of Jacumba and approximately 0.5-mile west of the Jacumba Airport. Primary access to the project site is provided by Old Highway 80, which forms the site's southerly boundary. A regional location map is provided in Figure 1 and a vicinity map is shown in Figure 2. Jacumba is located within the Mountain Empire Sub-Regional planning area of the County of San Diego General Plan.

## Existing Setting

The approximately 5-acre property is currently undeveloped and vacant, including the approximately 2.77-acre project site. The project site is generally flat, with elevations ranging from 2,797 feet to 2,799 feet above mean sea level (msl) and gradually sloping from southwest to northeast. The project site is open to natural areas to the west, north, and east, and is bounded by Old Highway 80 on the south.

The project site has a County of San Diego General Plan land use designation of Specific Plan Area and zoning designation of S88 (Specific Planning Area). The proposed project is consistent with the existing County of San Diego General Plan land use (Specific Plan Area) and exempt from zoning (S88 – Specific Planning Area) designations for the site. The Specific Plan Area land use designation allows for major facilities that are built and maintained for public use, including community service facilities.

The Zoning Ordinance and zoning designation (S88 – Specific Planning Area) do not apply to this project pursuant to Section 1006(b) of the Zoning Ordinance as it involves the development of a County owned and operated facility and provides a public purpose.



Source: Adapted by Ascent in 2024.

**Figure 1. Regional Vicinity**





Source: Adapted by Ascent in 2024.

**Figure 2. Project Location**

Surrounding land uses include the community of Jacumba to the west, vacant land to the north and east, and Old Highway 80 and vacant land to the south. The JVR Energy Park project is an entitled solar energy and storage facility to be located east, north, and south of the project site; however, it has not been constructed as of the date of this document.

Habitat on site is limited to non-native grassland. More information about the existing habitat and special-status species on and adjacent to the project site is provided in Section IV, "Biological Resources," of the attached Initial Study/Environmental Checklist and Biological Resources Letter Report (Appendix A1).

Additionally, the project site is within the Jacumba Valley Archaeological District (JVAD), and there is one previously recorded archaeological site (CA-SDI-8072) that intersects the project site. More information about the existing cultural resources on the project site is provided in Section V, "Cultural Resources," of the attached Initial Study/Environmental Checklist and the *Archaeological Survey for the Jacumba Fire Station #43 Survey Project in Jacumba Hot Springs, San Diego County, California* (Appendix B).

## PROJECT OBJECTIVES

The County of San Diego DGS has developed the following objectives for the proposed project:

1. Construct a full-service purpose-built fire station to meet the fire protection and emergency services needs of the Jacumba area and surrounding unincorporated areas;
2. Replace the existing substandard Jacumba Fire Station 43 with a new full-service fire station;
3. Develop a new fire station that meets the design standards for County facilities and properties outlined in Board of Supervisors Policy G-15;
4. Continue to provide mutual aid assistance to Imperial County under the California Fire and Rescue Mutual Aid System.

## PROJECT DESCRIPTION

### Project Background

The County of San Diego DGS completed a County Fire Strategic Facility Plan (July 2022), and Jacumba Fire Station was ranked as the top priority facility for replacement/relocation. The existing Jacumba Fire Station 43 has a gross area of 2,760 square feet and consists of a pre-engineered metal building constructed in 2004. The station was originally designed for volunteer response and does not have an office or physical separation between interior uses. For example, there is no separation between the bunk room and kitchen or bathroom, and the fitness area is located in the apparatus bay. As such, the existing fire station does not meet operational or health/safety goals

outlined in the County Fire Strategic Facility Plan. The County Fire Strategic Facility Plan determined that the existing Jacumba Fire Station 43 does not meet multiple facility criteria including department operational requirements, essential facility criteria, security criteria, sustainability criteria, and ADA accessibility compliance. For these reasons, the existing Jacumba Fire Station 43 needs to be replaced. Once the new fire station is complete, the existing fire station would cease operations.

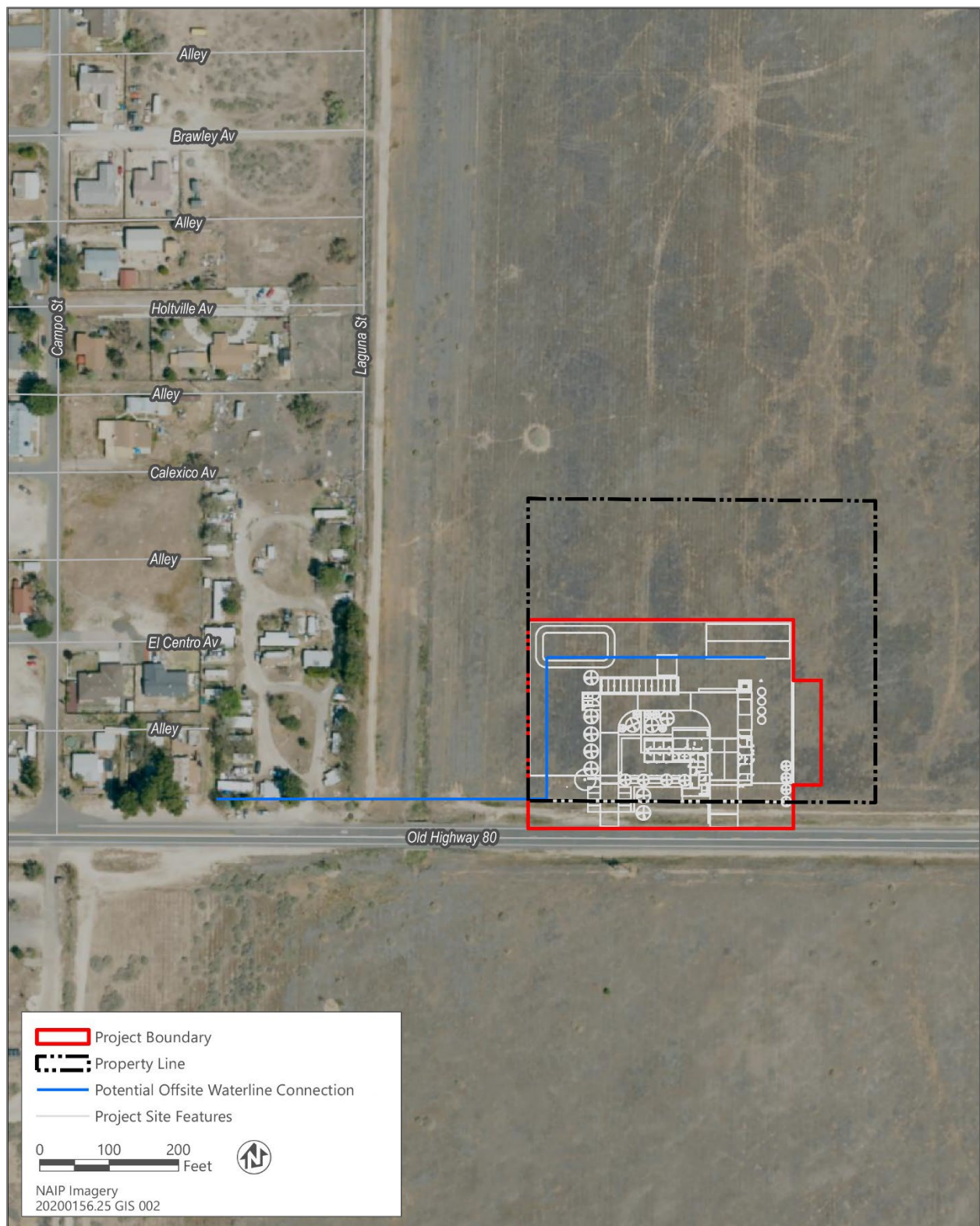
## Project Components and Operations

The proposed project involves the construction and operation of a new approximately 8,500 square foot fire station and associated facilities within an approximately 2.77-acre portion of a 5-acre property (portion of APN 660-150-18-00) located in the unincorporated community of Jacumba in southeastern San Diego County. The proposed fire station would replace the existing Jacumba fire station located at 1255 Jacumba Street in Jacumba Hot Springs, which would cease operations once the new fire station is complete and operational. The existing fire station property is leased by the County from a private property owner. The existing lease for the site will expire in October 2025, at which time the site could be renewed for continued fire station purposes until the new station is operational or repurposed by the property owner. However, any potential future repurposing of the existing fire station site would be independent of and separate from the proposed project. Furthermore, no demolition of the existing fire station site would occur as part of the proposed project. Therefore, analysis of future use or activity at the existing fire station site would be speculative.

The new fire station would be identified by the same station number and would have the same service area as the existing Jacumba Fire Station (i.e., Fire Station No. 43). In addition, the new fire station would continue to provide mutual aid assistance to adjacent Imperial County in the event of an emergency.

The fire station would be staffed and operated 7 days per week, 24 hours per day. Similar to the existing Jacumba Fire Station, each shift would include a minimum of three firefighters, one of which would be a paramedic. Each fire fighter would work three 24-hour shifts per week. In 2023, the existing fire station responded to a total of 435 calls, with an average of 1.2 calls per day. It is anticipated that operations at the new fire station would be similar to existing conditions. The new fire station would be under the jurisdiction of San Diego County Fire. However, the station would be operated in cooperation with CAL FIRE, who would be contracted by San Diego County Fire to provide fire protection and emergency medical services. Figure 3 overlays the conceptual site plan with the existing aerial of the property boundary and project boundary, Figure 4 shows the conceptual site layout, Figure 5 shows the sectional site layout, Figure 6 shows the exterior elevations, and Figure 7 shows a conceptual rendering of the project.

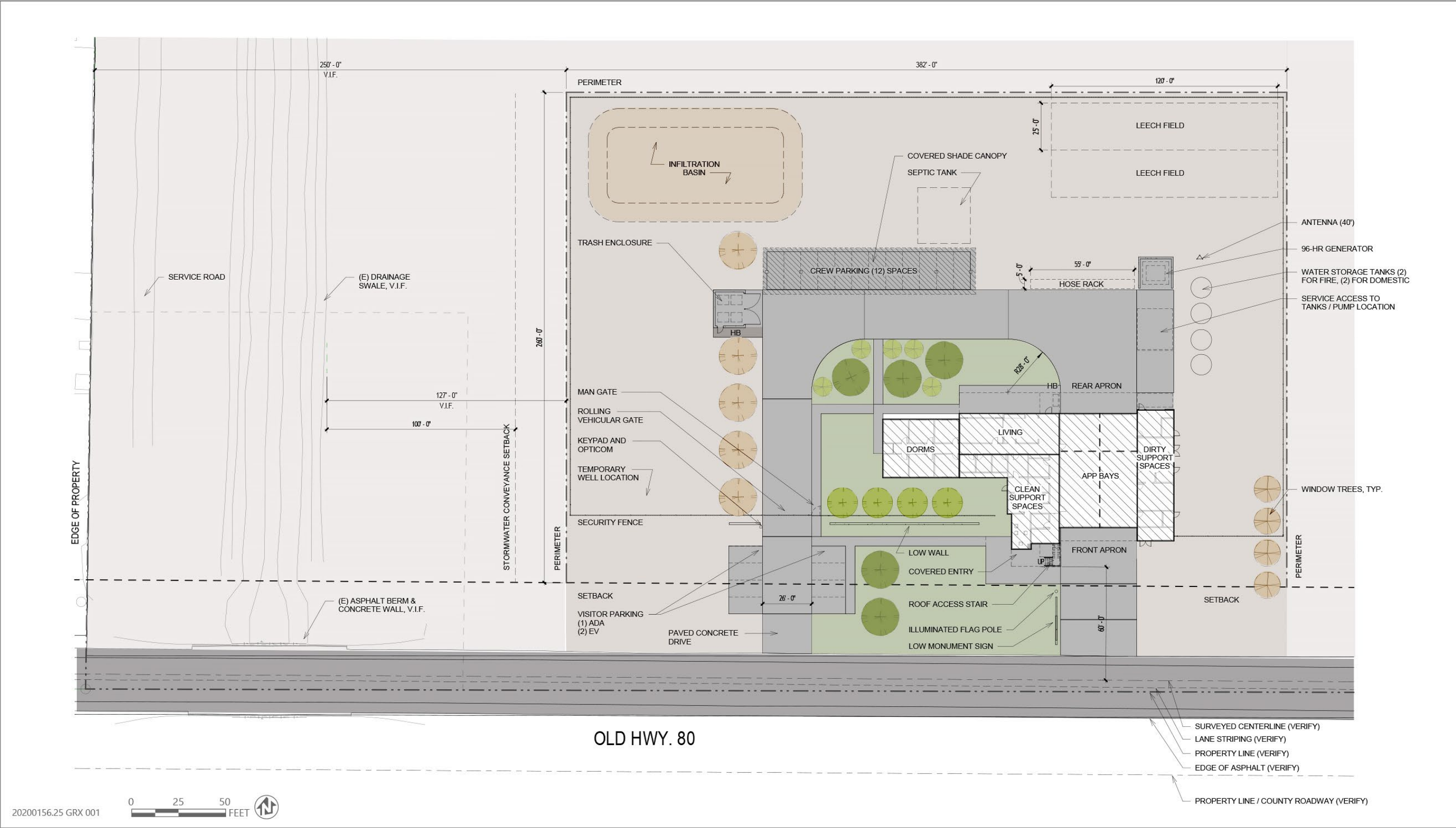




Source: Adapted by Ascent in 2024.

**Figure 3. Existing Conditions Aerial View Overlaid with Proposed Conceptual Site Plan**

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Source: Image produced and provided by Roesling Nakamura Terada Architects in 2024; Adapted by Ascent in 2024.

Figure 4. Jacumba Fire Station Conceptual Site Layout



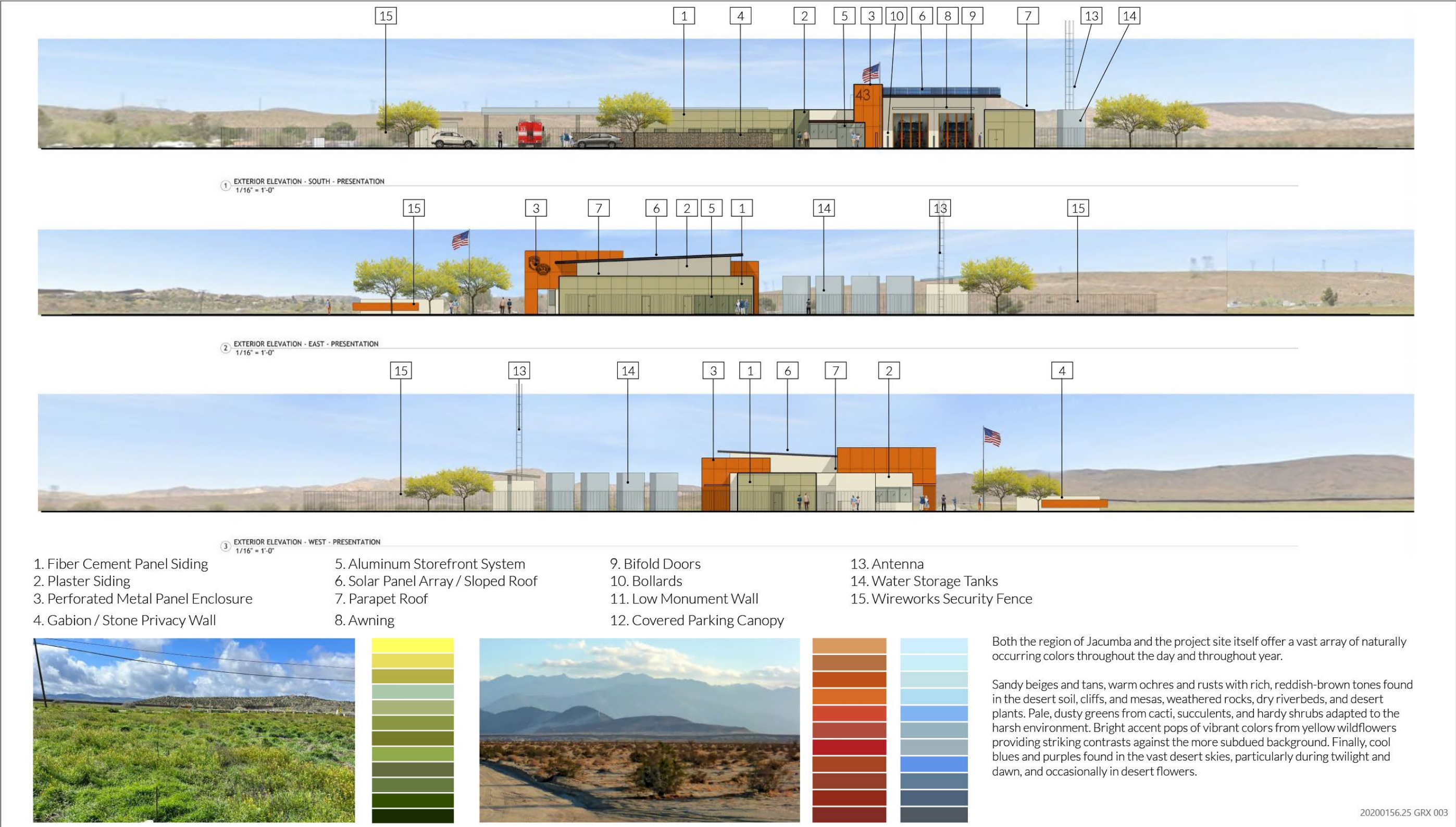




Source Image produced and provided by Roesling Nakamura Terada Architects in 2024; Adapted by Ascent in 2024.

Figure 5. Jacumba Fire Station Conceptual Sectional Site Layout





Source Image produced and provided by Roesling Nakamura Terada Architects in 2024; Adapted by Ascent in 2024.

Figure 6. Jacumba Fire Station Conceptual Exterior Elevations







Source: Image produced and provided by Roesling Nakamura Terada Architects in 2024; Adapted by Ascent in 2024.

**Figure 7. Jacumba Fire Station Conceptual Site Rendering**





The proposed fire station includes the following components within the 2.77-acre project site:

- An approximately 8,500 square-foot building with up to three bays that will accommodate five apparatus, including two type 1 (35-foot) fire trucks, two type 2 (24-foot) fire trucks, and one paramedic ambulance (24-foot);
- Building interior consisting of six double-bunk dorm rooms, a kitchen, dining room, day room, lobby, office, gym, laundry, restrooms, mechanical/electrical space, and equipment storage;
- Concrete ingress/egress access driveways, with an approximately 55-foot front setback and 60-foot-wide apron in front of the apparatus bays to facilitate access onto Old Highway 80;
- On-site parking consisting of approximately 12 spaces for employees, and up to nine visitor spaces to include one space for ADA Van, and two electric vehicle parking spaces with EV charging equipment;
- Two 10,000-gallon potable water storage tanks and two 10,000-gallon fire water storage tanks, each located above ground on 12 foot by 12 foot, 8-inch concrete pads with seismic restraints (tanks not to exceed 14 feet in height);
- One outdoor fire hose rack;
- An approximately 20-foot by 165-foot stormwater bioswale/infiltration basin to provide stormwater pollution, prevention, and flow control of stormwater generated onsite;
- An approximately 8,100-square-foot septic leech field and septic tank to provide on-site wastewater treatment for the proposed fire station;
- A new well and appurtenant small water treatment system to provide potable water to the proposed fire station;
- A 5,160-square-foot, 550-kilowatt (kW) ground mounted and/or roof mounted photovoltaic (PV) solar array to provide electrical power to the proposed fire station;
- An emergency diesel generator contained within a noise attenuating enclosure not to exceed 10-feet in height;
- Landscaping (native and drought tolerant), signage, security fencing, flagpole, trash enclosure, and shielded/downward-directed night lighting; and
- Radio communications antenna, not to exceed a height of 40 feet.

The proposed fire station may potentially include the following off-site components:

- *Optional:* If determined feasible, install an approximately 475-linear-foot waterline underground that would connect the project site with the closest connection point

of the Jacumba Community Service District (JCSD) water system. The waterline would travel west of the project site and north-adjacent of Hwy 80 (see Figure 4).

## Design Features

The proposed project will be designed in accordance with the County Board of Supervisors Policy G-15 (Policy G-15) Design Standards for County Facilities and Property, which establishes general principles and objectives for the design, construction, and improvement of owned or leased County facilities and property. Policy G-15 encourages green building design and operation, setting environmental standards that maximize energy efficiency and resource conservation. The proposed project would be designed to achieve US Green Building Council (USGBC) LEED Gold rating, would pursue Zero Net Energy construction supported by PV solar arrays and energy use enhancements beyond California Energy Code Title 24, would include water efficient landscaping and electric vehicle charging stations, and would utilize building materials and construction methods that reduce embodied carbon in order to reduce overall greenhouse gas emissions during the pre-occupancy phase.

The architectural features of the new fire station would utilize materials that are durable, require minimal maintenance, and complement the surrounding community and natural landscape. Exterior materials may include a combination of cast-in-place concrete, concrete masonry block, composite and steel architectural panels, exterior plaster, and exposed steel and/or wood framing. The roof may be a combination of either a non-reflective galvanized metal standing seam system or single-ply membrane roofing depending on the application. Vehicular doors would be either aluminum or steel accordion style doors with glass panels where required. Additionally, exterior wall construction would consist of steel or wood framing and moment-resisting assemblage of beams and columns with beams connected to columns, and cementitious plaster/fiber cement panel exterior finish, a weather barrier, and plywood wall sheathing. Except for communication antennas or similar structures, the maximum height of the new fire station facilities would not exceed 30 feet, which includes any roof-mounted mechanical equipment. The radio communications antenna would not exceed 40 feet in height. Shade canopies, where required, will be galvanized steel or wood framed with metal roofs. New hardscape and driveways would be paved with concrete over aggregate base, totaling approximately 21,000 square feet. Landscape design will utilize County approved planting palettes, low-water use, and are native to the site and local area.

In addition to the sustainability design features above, the proposed project includes the following project design features to address the potential for flooding at the project site.

- **PDF-HYD-1: Raise Finished Floor Elevation.** Prior to approval of final design plans, the County Department of Public Works shall verify that all project components located within the 100-year floodplain shall comply with the County of San Diego Flood Damage Prevention Ordinance, County Hydrology Manual,

and County Hydraulic Design Manual, which includes raising the finished floor elevation of the site to one (1) foot above base flood elevation.

- **PDF-HYD-2: Flood Fencing Types.** Flood fencing shall be either breakaway fencing or flow through fencing, as described below:
  - Where flood fencing is provided along Old Highway 80, breakaway type fencing should be used where feasible. Flow-through fencing may be used along Old Highway 80 if drainage conditions warrant its use. However, if flood depths exceed 12 inches, breakaway type fencing (not flow through) must be used along Old Highway 80.
  - Where flood fencing is provided elsewhere (not along Old Highway 80), either flow-through or breakaway fencing may be used.

## Construction Activities

The proposed project would be constructed on an undeveloped property. As such, no existing structures would be demolished as part of the project. Project construction would involve excavation for building foundations and utilities, as well as the proposed bioswale and leech field. The maximum depth of excavation would be approximately 5 feet below ground surface over an approximately 8,500 square foot area (i.e., fire station building footprint) for the fire station building foundation. In total, it is estimated that 1,500 cubic yards (cy) of excavation would be required for construction of the project. Given the relatively level nature of the project site, it is anticipated that only minor grading would be needed, and all excavation would be re-compacted and balanced onsite. Therefore, no soil would need to be exported from the project site.

## Utilities

The project site is in a rural part of the unincorporated county that is not currently served by municipal water or wastewater systems. Water to serve the project (potable and fire station operations) would be provided via a new onsite well and appurtenant small water treatment system. Should the sphere of influence of the JCSD be adjusted to include the project site, water may also be provided via an approximately 475 linear foot connection to the JCSD water system. Wastewater generated by the project would be disposed of via septic system. As noted in Section 2.5.1, the project includes the installation of an approximately 8,100 square foot leech field and septic tank for the proposed septic system. Additionally, as described in Section 2.5.2, the project includes an approximately 5,160 square foot, 550 kW PV solar array to provide electrical power to the proposed fire station. The proposed PV solar array would provide enough electricity to meet the energy demands of the new fire station. Electrical service would be provided by San Diego Gas & Electric (SDG&E) via the onsite PV solar system. Associated easements for necessary utilities are also included in this analysis.

## Project Schedule

The project will be built utilizing the Construction Manager at Risk procurement method. The anticipated procurement and construction schedule is as follows:

- Procurement: 8-9 months
- Design/permitting/approval: 12 months
- Construction: 12-14 months

Construction of the project is anticipated to begin in January 2026 and is expected to take 12 to 14 months. The new fire station is anticipated to be operational by April 2027. Estimated construction phasing is provided in Table 1.

**Table 1 Construction Phasing**

Phase	Components	Schedule
Site Grading and Utilities	<ul style="list-style-type: none"><li>• Clear Site – Best Management Practices (BMPs)</li><li>• Grade Site</li><li>• Install Site Drainage System</li><li>• Install Underground Utilities</li><li>• Finish Grade Site</li><li>• Install Caltrans Driveway Approach (Old Highway 80)</li></ul>	January 2026 – April 2026
Foundations	<ul style="list-style-type: none"><li>• Layout Survey Pad</li><li>• Excavate and Dig Footing</li><li>• Form Foundation</li><li>• Underground Plumbing / Electrical</li><li>• Fine Grade Slab</li><li>• Installation of Steel Rebar</li><li>• Prepare and Pour Concrete Slab on Grade</li><li>• Strip Forms and Fine Grade at Building Perimeter</li></ul>	March 2026 – May 2026
Structure	<ul style="list-style-type: none"><li>• Layout and Prep for Steel Structural Frame</li><li>• Erect Structural Steel Framing</li><li>• Frame Steel Roof / Insulate and Sheet</li></ul>	June 2026 – July 2026

Phase	Components	Schedule
Sub-Structure	<ul style="list-style-type: none"> <li>• Frame and Sheet Exterior Finish</li> <li>• Frame Interior Walls and Ceiling</li> <li>• Frame and Sheet Roof System</li> <li>• Rough Electrical, Plumbing, HVAC, and Alerting System</li> <li>• Dry Roofing Moisture System</li> <li>• Windows and Exterior Doors</li> <li>• Prerock Drywall</li> </ul>	July 2026 – September 2026
Fire Sprinkler and Alarm	<ul style="list-style-type: none"> <li>• Install fire sprinkler and alarm system</li> </ul>	August 2026 – September 2026
Exterior Miscellaneous	<ul style="list-style-type: none"> <li>• Garage Doors</li> <li>• Exterior Building Finishes</li> <li>• Trash Enclosure and Emergency Generator</li> </ul>	July 2026 – September 2026
Interior Finishes	<ul style="list-style-type: none"> <li>• Insulation</li> <li>• Drywall</li> <li>• Painting</li> <li>• Cabinets</li> <li>• Doors</li> <li>• Electrical, Plumbing, and Mechanical</li> <li>• Ceramic Walls</li> <li>• Vinyl Floors / Bath Floor Covering</li> </ul>	October 2026 – January 2027
Exterior Finishes	<ul style="list-style-type: none"> <li>• Stucco Exterior</li> <li>• Paint Exterior Doors</li> <li>• Exterior Signage</li> <li>• Architectural Metal Roof System</li> </ul>	January 2027 – February 2027
Landscaping and Septic System	<ul style="list-style-type: none"> <li>• Landscaping</li> <li>• Septic System / Leach Field</li> <li>• Hardscape / Asphalt and Concrete Paving</li> </ul>	February 2027 – March 2027
Final Closeout	<ul style="list-style-type: none"> <li>• Final Punch List</li> <li>• Signoff and Occupancy</li> </ul>	March 2027 – April 2027

## Anticipated Permits and Approvals Required

The anticipated permits and approvals required for the proposed project are provided in Table 2.

**Table 2 List of Anticipated Permits and Approvals Required**

Agency	Permit or Approval
San Diego Regional Water Quality Control Board	<ul style="list-style-type: none"><li>• National Pollutant Discharge Elimination System (NPDES) General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities (Construction General Permit)</li></ul>
County of San Diego	<ul style="list-style-type: none"><li>• Architectural Design Review and Building/Grading Permits</li><li>• Creation of New Parcel</li><li>• Adoption of the Mitigated Negative Declaration in compliance with CEQA</li><li>• Adoption of Mitigation Monitoring and Reporting Program</li><li>• Approval of the project</li><li>• Department of Environmental Health and Quality (DEHQ) Occupational Health Letter of Conformance</li><li>• Acceptance and Recordation of Easement Deed for Property</li><li>• DEHQ permits related to water well, small water systems, and on-site wastewater treatment systems (septic)</li></ul>
LAFCO	<ul style="list-style-type: none"><li>• (Optional) Jacumba Community Services District boundary adjustment to sphere of influence</li></ul>

9. Surrounding land uses and setting (Briefly describe the project's surroundings):

The area surrounding the project site includes the community of Jacumba, which includes primarily residential rural development to the west. Otherwise, the surrounding area is generally undeveloped except for the Jacumba Airport approximately 0.5-mile east and a few structures dispersed along Old Highway 80. The JVR Energy Park project is an entitled solar energy and storage facility to be located east, north, and south of the project site; however, it has not been constructed as of the date of this document.

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

See "Anticipated Permits and Approvals Required" under #8, above.



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

YES

☒

NO

☐

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

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

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

**DETERMINATION:**

On the basis of this initial evaluation:

- ☐ On the basis of this Initial Study, the Department of General Services finds that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- ☒ On the basis of this Initial Study, the Department of General Services finds that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- ☐ On the basis of this Initial Study, the Department of General Services finds that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

\_\_\_\_\_  
Signature

Marko Medved, PE, CEM  
\_\_\_\_\_  
Printed Name

\_\_\_\_\_  
Date

\_\_\_\_\_  
Director, DGS  
Title

## **INSTRUCTIONS ON EVALUATION OF ENVIRONMENTAL IMPACTS**

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

**I. AESTHETICS** – Would the project:

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

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

Discussion/Explanation:

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

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

The proposed project would be located on a currently undeveloped, vacant property in the unincorporated community of Jacumba. Based on a review of the County General Plan and Mountain Empire Subregional Plan, the project site does not contain any designated scenic vistas. Additionally, the project site is not located near or within the viewshed of a scenic vista, nor is it visible from a scenic vista (County of San Diego 2011, 2016). Therefore, the project would not have a substantial adverse effect on an existing scenic vista and this impact would be less than significant.

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

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

Discussion/Explanation:

**Less-than-Significant Impact:** State scenic highways refer to those highways that are officially designated by the California Department of Transportation (Caltrans) as scenic. Generally, the area defined within a State scenic highway is the land adjacent to and visible from the vehicular right-of-way. The dimension of a scenic highway is usually identified using a motorist's line of vision, but a reasonable boundary is selected when the view extends to the distant horizon. The scenic highway corridor extends to the visual limits of the landscape abutting the scenic highway. There are no officially Designated

State Scenic Highways in the vicinity of the project site; however, one Eligible State Scenic Highway and two County Scenic Highways are present, as described below.

The project site is located approximately 1.6 miles from Interstate 8 (I-8), which is designated as a County Scenic Highway from the City of El Cajon to the Imperial County line (County of San Diego 2011). Additionally, I-8 is listed as an Eligible State Scenic Highway from Sunset Cliffs Boulevard in the City of San Diego to Route 98 in Imperial County. Due to the project's distance from I-8 and its small scale, as well as intervening vegetation, buildings, and other visual features located between the highway and the project site, the project would not have a substantial adverse effect on scenic resources along or within view of this highway.

Old Highway 80 is also designated as a County Scenic Highway from State Route 79 (Pine Valley) to I-8 (Jacumba) (County of San Diego 2011). Because the front of the new fire station would directly abut this designated segment of Old Highway 80, the proposed project would be visible to those traveling in either direction along the Scenic Highway. However, landscaping native to the site and local area would be installed along the perimeter of the project site in accordance with County guidelines to reduce views of the project by travelers on the road. Additionally, the overall height of the fire station building would not exceed 30 feet, including any roof-mounted mechanical equipment, and the height of the radio communications antenna would not exceed 40 feet. Additionally, architectural features of the new fire station would include materials that complement the surrounding community and natural landscape. Exterior materials may include a combination of cast-in-place concrete, concrete masonry block, composite and steel architectural panels, exterior plaster, and exposed steel and/or wood framing. Furthermore, exterior wall construction would consist of steel or wood framing and moment-resisting assemblage of beams and columns with beams connected to columns, and cementitious plaster/fiber cement panel exterior finish, a weather barrier, and plywood wall sheathing. As such, materials would reflect the rural character of the community through the use of natural building materials such as wood or stone. Project design would conform to design requirements included in the County of San Diego General Plan and Central Mountain Subregional Plan.

Moreover, the project does not include the demolition of any structures, including historic structures, or the removal of any trees or rock outcroppings. Therefore, project impacts would be less than significant, and no mitigation is required.

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

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

Discussion/Explanation:

**Less-than-Significant Impact:** Visual character is the objective composition of the visible landscape within a viewshed. Visual character is based on the organization of the pattern elements line, form, color, and texture. Visual character is commonly discussed in terms of dominance, scale, diversity and continuity. Visual quality is the viewer's perception of the visual environment and varies based on exposure, sensitivity and expectation of the viewers. The existing visual character and quality of the project site and surrounding area can be characterized as rural. As such, the project site and surrounding area are classified as non-urbanized.

The proposed project involves the construction and operation of a new fire station on a currently undeveloped, vacant property in the unincorporated community of Jacumba. The area surrounding the project site includes the community of Jacumba, which includes primarily residential rural development to the west. Otherwise, the surrounding area is generally undeveloped except for the Jacumba Airport approximately 0.5-mile east and a few structures dispersed along Old Highway 80. Public views of the site would generally occur from vehicles traveling on Old Highway 80. Project construction activities would be visible from Old Highway 80. Construction equipment could include a grader, loader/backhoe, a dozer, crane, cement mixer, pavers, rollers, and air compressors. The equipment would be temporary and, given the lack of visual resources in the immediate area, would not substantially degrade the existing visual character or quality of views of the project site and its surroundings.

As discussed under item I(b) above, once operational, landscaping native to the site and local area would be provided along the perimeter of the project site in accordance with County guidelines in order to reduce views of the project by travelers on the road, and the height of the new fire station building and communications antenna would not exceed 30 feet and 40 feet, respectively. Additionally, architectural features of the new fire station would include materials that complement the surrounding community and natural landscape. Exterior materials may include a combination of cast-in-place concrete, concrete masonry block, composite and steel architectural panels, exterior plaster, and exposed steel and/or wood framing. Furthermore, exterior wall construction would consist of steel or wood framing and moment-resisting assemblage of beams and columns with

beams connected to columns, and cementitious plaster/fiber cement panel exterior finish, a weather barrier, and plywood wall sheathing. As such, materials would reflect the rural character of the community through the use of natural buildings materials such as wood or stone. Furthermore, project design would conform to design requirements included in the County of San Diego General Plan and/or Central Mountain Subregional Plan. As such, the project would be compatible with the existing visual character and quality of the area, and therefore would not substantially degrade the existing visual character or quality of public views of the site and its surroundings. Impacts would be less than significant, and no mitigation is required.

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

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

**Discussion/Explanation:**

**Less-than-Significant Impact:** The project site is located approximately 64 miles southeast of Palomar Observatory and approximately 20 miles southeast of Mount Laguna Observatory. Two zones have been defined to categorize distance from these observatories. Zone A for each observatory includes a 15-mile radius from the observatory's location; Zone B is all land outside that radius. As such, the project site is located in Zone B. The San Diego Light Pollution Code (Section 51.201-51.209) includes design restrictions for exterior lighting in Zone B. The proposed project would include new exterior lighting for safety purposes. All exterior lighting installed as part of the project would be installed and operated in compliance with the County's Light Pollution Code, and all outdoor lighting would be shielded and directed downward to minimize spillover onto adjacent properties. Additionally, exterior lighting included in project design would be the minimum amount required for vehicular and operational safety.

The proposed project also includes a 5,160-square-foot, 550 kW ground mounted/roof mounted PV solar array to provide electrical power to the proposed fire station. To address the potential for glare from the proposed PV solar array, a glare study was completed to determine if there would be any glare impact on drivers along Old Highway 80 (Appendix C). The glare study found that there would be no glare experienced by drivers along Old Highway 80. Therefore, based on the results of the Glare Study, the proposed project would not result in any substantial sources of glare that could significantly affect driver vision along Old Highway 80.

For the reasons described above, the project would not create a new source of substantial light or glare that would adversely affect day or nighttime views in the area. Therefore, impacts related to light and glare would be less than significant, and no mitigation is required.

**II. AGRICULTURE AND FORESTRY RESOURCES** – Would the project:

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

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

Discussion/Explanation:

**Less-than-Significant Impact:** The project site is located on land designated as Prime Farmland as shown on the maps prepared by the California Department of Conservation pursuant to the Farmland Mapping and Monitoring Program (FMMP) of the California Resources Agency (DOC 2024). The project site does not contain any land designated as Unique Farmland or Farmland of Statewide or Local Importance under the FMMP. The proposed project would involve the construction and operation of a new 8,500 square foot fire station on a 2.77-acre portion of a currently undeveloped, vacant 5-acre property that is approximately 250 feet east of rural residential development. Additionally, there are no existing agricultural resources or operations on the site or surrounding area. Therefore, no agricultural resources will be converted to non-agricultural use. This impact would be less than significant.

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

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

Discussion/Explanation:

**Less-than-Significant Impact:** The project site has a General Plan land use designation of Specific Plan Area and zoning designation of S88 (Specific Planning Area), which, among other uses, permits certain types of agricultural uses (horticulture, tree crops, row and field crops, and packaging and processing [limited]). However, the proposed project would not conflict with zoning for agricultural use because there are no existing agricultural uses on or in the vicinity of the project site. As such, the project would not create a conflict with existing zoning for agricultural use. Additionally, the Zoning Ordinance does not apply to this project pursuant to Section 1006(b) as it involves the development of a County owned and operated facility and provides a public purpose. Furthermore, the project site is not under a Williamson Act Contract. Therefore, the project would not result in a conflict with existing zoning for agricultural use or a Williamson Act contract. This impact would be less than significant.



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

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

Discussion/Explanation:

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

**d) Result in the loss of forest land, conversion of forest land to non-forest use, or involve other changes in the existing environment, which, due to their location or nature, could result in conversion of forest land to non-forest use?**

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

Discussion/Explanation:

**No Impact:** The project site does not contain any forest lands as defined in Public Resources Code section 12220(g). In addition, the project is not located in the vicinity of offsite forest resources, nor does it propose any offsite improvements that could result in the loss of forest resources. Therefore, the project would not result in the loss or conversion of forest land to non-forest use. No impact would occur.

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

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

Discussion/Explanation:

**Less-than-Significant Impact:** The project site and surrounding area do not contain any active agricultural operations or lands designated as Unique Farmland or Farmland of

Statewide or Local Importance as shown on the maps prepared by the California Department of Conservation pursuant to the FMMP. Although the project site is designated as Prime Farmland, there are no existing agricultural resources or operations on the site or in the immediate surrounding area. Notably, rural residential development is approximately 250 feet west of the project site. As such, the project would not convert existing agriculture to a non-agricultural use. Therefore, the project would not involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Important Farmland or other agricultural resources, to non-agricultural use. This impact would be less than significant.

### **III. AIR QUALITY**

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

**a) Conflict with or obstruct implementation of the applicable air quality plan?**

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

**Less-than-Significant Impact:** The San Diego Air Pollution Control District (SDAPCD)'s Regional Air Quality Strategy (RAQS) is the regional air quality plan for the San Diego region, which addresses State requirements, pursuant to the California Clean Air Act (CCAA) of 1998 and identifies feasible emissions control measures to provide expeditious progress toward attaining the state ozone standard in San Diego County. The RAQS relies on the San Diego Association of Governments (SANDAG) growth projections which are based on population, vehicle miles traveled (VMT), and land use plans developed by the City or County as part of their general plans. The RAQS was initially adopted in 1991 and is updated on a triennial basis. The most recent RAQS is the 2022 RAQS, which was approved by the SDAPCD board on March 9, 2023 (SDAPCD 2023).

The State Implementation Plan (SIP) includes strategies to be used to attain and maintain air quality standards in the County pursuant to the CCAA. The SIP includes strategies to be used to attain and maintain federal air quality standards. Under the SIP, SDAPCD has prepared the Plan for Attaining the National Ambient Air Quality Standards for Ozone in San Diego County (CARB 2023). The California Air Resources Board (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. As such, projects that propose development that is consistent with the growth anticipated by the general plans would be consistent with the RAQS and SIP.

The use of construction equipment in the RAQS and SIP are estimated for the region on an annual basis, and construction-related emissions are estimated as an aggregate.

Therefore, the project would not increase the assumptions for off-road equipment use in the RAQS or SIP. While the RAQS and SIP acknowledge mobile and area sources, minor changes in the assumptions relative to these sources would not obstruct successful implementation of the strategies for improvement of the San Diego Air Basin's (SDAB) air quality. Since the project would relocate existing fire and emergency services from the existing Jacumba Fire Station to a new facility, traffic and VMT are anticipated to remain the same as current operation. Thus, the project would not conflict with the RAQS and SIP.

Because the proposed project would not generate a substantial amount of additional vehicle trips, the proposed project would not result in notable additional emissions over the current assumptions used to develop the RAQS and SIP. Since the proposed project would not result in a substantial increase in criteria pollutant emissions compared to current assumptions, the project would not conflict with or obstruct implementation of the applicable air quality plan. This impact would be less than significant, and no mitigation is required.

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

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

**Less-than-Significant Impact:** San Diego County is currently designated as a nonattainment area for the 1-hour concentrations under the California Ambient Air Quality Standards (CAAQS) for Ozone (O<sub>3</sub>), 8-hour concentrations under both the CAAQS and National Ambient Air Quality Standards (NAAQS) for O<sub>3</sub>, 24-hour concentrations of particulate matter less than or equal to 10 microns (PM<sub>10</sub>) under the CAAQS, as well as the annual geometric mean of particulate matter less than or equal to 2.5 microns (PM<sub>2.5</sub>) under the CAAQS. O<sub>3</sub> is formed when volatile organic compounds (VOCs) and nitrogen oxides (NO<sub>x</sub>) react in the presence of sunlight. VOC sources include any source that burns fuels (e.g., gasoline, natural gas, wood, oil), solvents, petroleum processing and storage, and pesticides. Sources of PM<sub>10</sub> and PM<sub>2.5</sub> in both urban and rural areas include motor vehicles; wood-burning stoves and fireplaces; dust from construction; landfills; agriculture; wildfires; brush/waste burning; and industrial sources of windblown dust from open lands.

Construction emissions are described as "short-term" or temporary in duration; however, they have the potential to represent a significant impact with respect to air quality. Construction of the proposed project would result in the temporary generation of ROG, NO<sub>x</sub>, CO, SO<sub>2</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> emissions, as defined in Footnote 1 of Table 3. ROG, NO<sub>x</sub>, CO, and SO<sub>2</sub> emissions are primarily associated with mobile equipment exhaust, including off-road construction equipment and on-road motor vehicles. Fugitive PM dust emissions are primarily associated with site preparation and vary as a function of such parameters as soil silt content, soil moisture, wind speed, acreage of disturbance area, and VMT by construction vehicles on- and off-site.

As detailed in Chapter 2, “Project Description,” the proposed project involves the construction and operation of a new 8,500 square foot fire station and associated facilities on an approximately 2.77-acre portion of an undeveloped 5-acre property. Construction activities would be temporary and intermittent in nature occurring in phases from January 2026 to April 2027. Construction activities would involve site preparation, minor grading, and excavation for building foundations and utilities. Construction vehicles and equipment would access the project site via Old Highway 80 and all construction equipment and vehicle staging would occur within the limits of the project site.

Based on the County of San Diego Guidelines for Determining Significance, Air Quality, proposed projects would result in a significant impact if either construction or operation of the project would exceed the quantitative screening-level thresholds (SLTs) (County of San Diego 2007a).

Emissions associated with construction of the proposed uses were modeled using the California Emissions Estimator Model (CalEEMod), Version 2022.1.1.13, using a combination of project-specific information regarding construction schedule and vehicle trip distances, as well as model defaults. Construction is anticipated to start January 2026 and is expected to take 12 to 14 months. The new fire station is anticipated to be operational by April 2027. Maximum daily emissions were estimated and compared to the County’s SLTs. Emission modeling is conservative and assumes multiple phases overlapping and does not include emission reductions associated with compliance with San Diego County Grading Ordinance Section 87.428I, which requires watering to reduce fugitive dust.

The estimate of daily emissions of criteria pollutants over the entire construction period for the project is presented in Table 3. Additional modeling assumptions and details are provided in Appendix D.

**Table 3 Estimated Maximum Daily Construction Emissions**

	ROG	NO <sub>x</sub>	CO	SO <sub>2</sub>	PM <sub>10</sub> <sup>1</sup>	PM <sub>2.5</sub> <sup>1</sup>
Maximum Daily Construction Emissions (lbs/day)	4.91	44.51	47.75	0.08	28.96	15.35
Screening Level Threshold (lbs/day)	75	250	550	250	100	55
Significant Impact?	No	No	No	No	No	No

<sup>1</sup> PM<sub>2.5</sub> and PM<sub>10</sub> emissions shown include the sum of particulate matter with aerodynamic diameter 0 to 2.5 microns and particulate matter with aerodynamic diameter 2.5 to 10 microns, respectively.

ROG = reactive organic gases; NO<sub>x</sub> = oxides of nitrogen; CO = carbon monoxide; SO<sub>2</sub> = sulfur dioxide; PM<sub>10</sub>= suspended particulate matter; PM<sub>2.5</sub> = fine particulate matter.

Source: Ascent 2024.

As shown in Table 3, construction-generated emissions of ROG, NO<sub>x</sub>, CO, SO<sub>2</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> would not exceed the County’s SLTs. Moreover, emissions would also be controlled with standard construction practices enforceable pursuant to San Diego County Code of Regulatory Ordinances Title 9 Construction Codes and Fire Code.

Therefore, construction emissions would not violate an ambient air quality standard or contribute substantially to an existing violation. Construction-related impacts would be less than significant.

After construction, day-to-day activities associated with the operation of the proposed project would generate emissions from mobile and area sources. Operational emissions may be both direct and indirect emissions and would be generated by area and mobile sources associated with the project. Area-source emissions would be associated with maintenance activities. Mobile-source emissions would include vehicle trips by County Fire Authority personnel and members of the public.

The proposed fire station would replace the existing Jacumba fire station located at 1255 Jacumba Street, approximately 0.6-mile west of the project site. The new station would cover the same service area, would be staffed by the same number of daily employees, and the number of calls is not anticipated to change as a result of the project. The new fire station would be built in accordance with the County Board of Supervisors Policy G-15 (Policy G-15) Design Standards for County Facilities and Property, which encourages green building design and energy efficiency. The proposed project would be designed to achieve US Green Building Council (USGBC) LEED Gold rating, would pursue Zero Net Energy construction supported by PV solar arrays and energy use enhancements beyond California Energy Code Title 24, would include water efficient landscaping and electric vehicle charging stations, and would utilize building materials and construction methods that reduce resource consumption.

As noted, the proposed new fire station replaces the existing fire station. No change in service area, number of employees, or the number of emergency calls requiring fire response would change as a result of the project. Moreover, the proposed new fire station includes various sustainability features that are not present at the existing fire station. While the change in emissions between the existing and new fire station is likely to be minimal, for purposes of presenting a conservative analysis, emissions associated with operation of the new fire station were estimated and compared to the County's SLTs<sup>1</sup>. Emissions were quantified using CalEEMod, Version 2022.1.1.13, using a combination of project-specific information regarding vehicle trips and utility consumption, as well as model defaults. Additional modeling details are available in Appendix D. Emission estimates associated with operation of the proposed project are presented in Table 4.

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<sup>1</sup> Please note that the analysis does not consider emissions from existing operations and treats all activities and their associated emissions as new. This is a very conservative approach and has been done for impact purposes only due to the small quantity of operational emissions associated with the new fire station. If greater emissions were anticipated, the analysis would identify the net change in emissions when compared to emissions from the existing fire station.

**Table 4 Estimated Maximum Daily Operational Emissions**

	ROG	NO <sub>x</sub>	CO	SO <sub>2</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
Maximum Daily Operation Emissions (lbs/day)	0.35	0.10	0.61	0.001	0.01	0.01
Screening Level Threshold (lbs/day)	75	250	550	250	100	55
<i>Significant Impact?</i>	No	No	No	No	No	No

<sup>1</sup> PM<sub>2.5</sub> and PM<sub>10</sub> emissions shown include the sum of particulate matter with aerodynamic diameter 0 to 2.5 microns and particulate matter with aerodynamic diameter 2.5 to 10 microns, respectively.

ROG = reactive organic gases; NO<sub>x</sub> = oxides of nitrogen; CO = carbon monoxide; SO<sub>2</sub> = sulfur dioxide; PM<sub>10</sub> = suspended particulate matter; PM<sub>2.5</sub> = fine particulate matter

Source: Ascent 2024.

As shown in Table 4, the operational emissions would not exceed the County's SLTs. Therefore, construction and operation of the project would not violate an ambient air quality standard or contribute substantially to an existing violation. This impact would be less than significant, and no mitigation is required.

**c) Expose sensitive receptors to substantial pollutant concentrations?**

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

**Less-than-Significant Impact:** Sensitive receptors generally include those land uses where exposure to pollutants could result in health-related risks to sensitive individuals, such as children or the elderly. Residential dwellings, schools, hospitals, playgrounds, and similar facilities are of primary concern because of the presence of individuals particularly sensitive to pollutants and/or the potential for increased and prolonged exposure of individuals to pollutants.

Land uses immediately surrounding the project site include undeveloped, vacant land to the north, east, and west and Old Highway 80 and vacant land to the south. The nearest off-site sensitive receptors are residences within a mobile home park located approximately 250 feet west of the proposed project boundary. The residential units represent the nearest sensitive receptors with the potential to be impacted by construction and operation of the proposed project.

**Carbon Monoxide**

The primary mobile-source pollutant of localized concern is carbon monoxide (CO). Local mobile-source CO emissions near roadway intersections are a direct function of traffic volume, speed, and delay. Transport of CO is limited since it disperses rapidly with distance from the source under normal meteorological conditions. However, under specific meteorological conditions, CO concentrations near roadways and/or

intersections may reach unhealthy levels related to local sensitive land uses such as residential units, hospitals, schools, and childcare facilities.

CO concentration is a direct function of motor vehicle activity, particularly during peak commute hours, and meteorological conditions. Under specific meteorological conditions, CO concentrations may reach unhealthy levels with respect to local sensitive land uses, such as residential areas, schools, preschools, playgrounds, and hospitals. As a result, air districts typically recommend analysis of CO emissions at a local rather than a regional level.

The proposed project would not cause an increase in traffic volumes and would not result in CO concentrations exceeding the emission limit. The project would relocate existing fire and emergency services from the existing Jacumba Fire Station to a new facility and would not result in additional employee or emergency vehicle trips. While the project would relocate these trips from roadways near the existing fire station to roadways near the new fire station, these trips would be minimal and limited to six employee vehicle trips per day and the project would not result in any change in emergency response calls, which averaged 1.2 calls per day in 2023 (Toledo pers. comm., 2024). Moreover, the project site is in a more rural area in comparison to the existing fire station, which is within a residential neighborhood of Jacumba Hot Springs. Relocation of the fire station would likely reduce exposure to vehicle emissions because fewer sensitive receptors are located in the vicinity of the proposed project site. Accordingly, the CO concentrations resulting from the project would not violate the California Ambient Air Quality Standard for either the 1-hour period (20 parts per million [ppm]) or the 8-hour period (9.0 ppm). This impact would be less than significant.

### **Construction-Related Health Risks**

The greatest potential for toxic air contaminant (TAC) emissions resulting from construction of the proposed project would derive from diesel PM emissions associated with heavy equipment operations. Project construction would result in the generation of diesel PM from the use of off-road diesel construction equipment required for site preparation and building construction. Most diesel PM emissions associated with material delivery trucks and construction worker vehicles would occur off-site and would not substantially contribute to TAC emissions in the project area.

The generation of diesel PM emissions from construction projects typically occurs in a single area for a short period of time. The dose of TACs to which receptors are exposed is the primary factor used to determine health risk. Dose is a function of the concentration of a substance or substances in the environment and the extent of exposure a person has to the substance. Dose is positively correlated with time, meaning that a longer exposure period to a fixed amount of emissions results in a higher exposure level and higher health risks for the maximally exposed individual.

During construction, diesel PM is an issue of concern; however, project construction activities would be temporary, and long-term exposure to diesel PM would not occur. Site

grading activities during construction would also include dust control measures required by the San Diego County Grading Ordinance Section 87.428 such as: watering, application of surfactants, shrouding, control of vehicle speeds, paving of access areas, or other operational or technological measures to reduce dispersion of dust. Furthermore, SDAPCD rules and regulations would also reduce the project's construction generated PM emissions. Therefore, it is anticipated that PM concentrations would decrease substantially before affecting the nearest sensitive receptor.

Thus, considering the distance to the nearest sensitive receptor, intermittent emission source, and relatively low overall exposure period, construction emissions would not generate pollutant concentrations that expose sensitive receptors to substantial pollutant concentrations. This impact would be less than significant, and no mitigation is required.

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

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

**Less-than-Significant Impact:** Odors are generally regarded as an annoyance rather than a health hazard. Manifestations of a person's reaction to odors can range from psychological (e.g., irritation, anger, or anxiety) to physiological (e.g., circulatory and respiratory effects, nausea, vomiting, and headache). The occurrence and severity of odor impacts depend on numerous factors, including the nature, frequency, and intensity of the source; wind speed and direction; and the presence of sensitive receptors. While offensive odors rarely cause any physical harm, they still can be very unpleasant, leading to considerable distress and often generating citizen complaints to local governments and regulatory agencies.

Potential sources that may emit odors during construction of the proposed project would include exhaust from diesel construction equipment. The project would utilize typical construction techniques, and the odors from off-road equipment and on-road vehicles would be typical of most construction sites and temporary in nature.

The operation of the project would not add any new odor sources, and any odors generated would be similar to existing odors associated with land uses in the area. The land uses associated with the project would be public institutional uses. This type of land use is not typically a large generator of odor emissions. As a result, the project's construction and operational activities would not create objectionable odors affecting a substantial number of people. The impact would be less than significant, and no mitigation is required.



**IV. BIOLOGICAL RESOURCES** – 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 the U.S. Fish and Wildlife Service?**

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

Discussion/Explanation:

Prior to discussing project-related impacts on biological resources, the definitions of direct impacts and indirect impacts are provided below.

**Direct Impacts**

Direct impacts include those involving the loss, alteration and/or disturbance of plant communities, and consequently, the flora and fauna of the affected area. Direct impacts also include the destruction of individual plants and/or wildlife. Direct impacts may adversely affect regional populations of certain species or result in isolated populations, reducing genetic diversity and range- wide population stability; conversely, in some cases direct impacts may also have intended or unintended positive effects.

**Indirect Impacts**

Indirect impacts include a variety of effects related to areas or habitats that are not directly removed by Project development, such as loss of foraging habitat, increased ambient noise, artificial light, introduced predators (e.g., domestic cats, dogs and other non-native animals), competition with exotic plants and animals, and increased human presence and associated disturbances (e.g., trash, green waste, physical intrusion). Indirect impacts may include long- and/or short-term daily activities associated with project build-out, such as increased traffic, permanent barriers or fences, buildings, exotic seed-bearing ornamental plantings, irrigated landscapes and human presence, among others. These types of impacts are known as edge effects and over time, may result in some encroachment on native plants by exotic plants, altered behavioral wildlife patterns, reduced wildlife diversity, and decreased wildlife abundance in habitats adjacent to a given project site. However, as is the case with direct impacts, indirect impacts may also have intended or unintended positive effects for certain species.

**Less than Significant with Mitigation Incorporated:** Blackhawk Environmental, Inc. (Blackhawk) conducted a literature review/database search, performed baseline biological resources assessment surveys, assessed existing conditions, and gauged special-status species habitat suitability. The literature review/database search included the CDFW

California Natural Diversity Database (CNDDDB), the US Fish & Wildlife Service (USFWS) Species Occurrence Database, and the California Native Plant Society's (CNPS) Electronic Inventory (EI) of Rare and Endangered Vascular Plants of California.

Blackhawk prepared a Biological Resources Letter Report for the project on June 6, 2024 describing the results of the literature review/database search and biological resources assessment completed on the approximately 5-acre property and associated 100-foot buffer (survey area). The habitat assessment focused on determining whether sensitive habitat and special-status plant and wildlife species occur or have the potential to occur within the project area. Furthermore, species specific assessments for special-status species were completed before, during, and after subsequent field survey visits for Quino checkerspot butterfly (*Euphydras editha quino*), burrowing owl (*Athene cunicularia*), and sensitive plant species to determine presence and/or absence or their potential to occur. The Biological Resources Letter Report is provided as Appendix A1 of this IS/MND. The results of the report are summarized below.

#### Impacts on Mapped Habitat Types

A total of three vegetation communities and/or land cover types were observed within the survey area, including (1) non-native grassland, (2) disturbed habitat, and (3) developed areas. Vegetation within the approximately 2.77-acre project boundary consists of non-native grassland (2.55 acres) and disturbed habitat (0.22 acres); however, disturbed habitat is not considered a sensitive habitat by the County. As such, project-related impacts on mapped habitat are restricted to non-native grassland habitat only. Table 5 identifies the potential impacts on existing habitat/vegetation communities as a result of the proposed project. As shown in Table 5, implementation of the proposed project would result in direct impacts on 2.55 acres of non-native grassland habitat (**Impact-BIO-1**).

**Table 5 Potential Impacts on Mapped Habitat**

Habitat / Vegetation Community	Existing (acres)	Impacts onsite (acres)	Impacts offsite (acres)	Mitigation Ratio	Mitigation Required (acres)	Preserved Onsite (acres)
Non-Native Grassland	2.55	2.55	0	0.5:1 <sup>a</sup>	1.275	0
Total	2.55	2.55	0	0.5:1	1.275	0

Source: Appendix A1.

Notes: <sup>a</sup> Per the County of San Diego *Guidelines for Determining Significance for Biological Resources* (County of San Diego 2010), the mitigation ratio shall be 1:1 if the site is in East Otay Mesa, occupied by burrowing owl, or the land is considered part of the Ramona grasslands.

To address this potential direct impact, mitigation measure **MM-BIO-1** would be required. This mitigation measure requires the purchase of off-site mitigation credits from a County-approved mitigation bank. As shown in Table 5, the project proponent would be required to mitigate at a 0.5:1 ratio for the loss of non-native grassland habitat, which would require the preservation of 1.275 acres offsite. In the event that occupied burrowing owl burrows are identified during pre-construction take avoidance surveys, **MM-BIO-1** requires the

ratio for loss of non-native grassland habitat to be increased to 1:1, for a total of 2.55 acres preserved offsite. Implementation of **MM-BIO-1** would reduce potential direct impacts on mapped habitat to less than significant. Therefore, potential direct impacts on mapped habitat would be less than significant with mitigation incorporated.

Additionally, the removal of non-native grassland habitat could result in indirect impacts such as changes in stormwater discharge hydrology downstream of the project due to a net increase of impervious surfaces. However, the proposed project would be required to implement source control, site design, and structural BMPs per the Regional MS4 Permit. BMPs would be identified from the County's BMP Design Manual and would be implemented in accordance with the County's Watershed Protection Ordinance (WPO). The project would also propose low impact development (LID) stormwater drainage features. Specifically, the project proposes to include a 20-foot by 165-foot stormwater bioswale/infiltration basin to provide stormwater pollution, prevention, and flow control of stormwater generated onsite. This LID feature would ensure proper drainage onsite as well as no adverse indirect impacts from stormwater runoff from the proposed structures during rainy conditions. For these reasons, potential indirect impacts on mapped habitat would be less than significant.

#### Impacts on Special-Status Plant Species

The literature review revealed 28 special status plant species occurring in the vicinity of the project site; however, none were observed during the field survey efforts. Additionally, no suitable habitat for these special status plant species occurs on the project site and/or those with suitable habitat are perennial species that would have been identified during the field survey if present. Furthermore, opportunistic surveys for target list sensitive plant species were performed before and after focused surveys for burrowing owl and Quino checkerspot butterfly to definitively determine their absence. No sensitive plant species were observed. Historical agricultural use and grading and lack of connectivity to natural source populations likely precludes special status plant species, including narrow endemics, from occurring within the project site. Moreover, no populations of special status plant species are known to occur immediately adjacent to the project site where they could be subjected to fugitive dust and/or encroachment upon by invasive and/or exotic landscape ornamental species. Therefore, potential direct and indirect impacts on special-status plant species would be less than significant.

#### Impacts on Special-Status Wildlife

A total of 30 special status wildlife species were identified during the literature review and field survey (see Table 3 of Appendix A1). Eight special status species were found to have moderate to high potential to occur based on the presence of historical records within two miles of the project site and low- to high-quality suitable habitat. These species include burrowing owl (moderate), Cooper's hawk (moderate – foraging only), prairie falcon (moderate – foraging only), turkey vulture (high – foraging only), American badger (moderate), tricolored blackbird (high – foraging only), greater western mastiff bat (moderate – foraging only), and pocketed free-tail bat (moderate – foraging only). Two of the special status species were observed, or previously observed, in the surrounding area

of the project site. Turkey vultures were observed 550 feet west of the Project Site during the survey. Previously, the remains of an American badger were found approximately 0.67 miles east of the project site during burrowing owl surveys completed at the Jacumba Airport property in 2022.

Protocol presence/absence surveys were conducted for Quino checkerspot butterfly and burrowing owl in 2024. The results of the presence/absence surveys for Quino checkerspot butterfly and burrowing owl are provided as Appendices A2 and A3, respectively. Results of the surveys determined that both species were absent from the project site and subsequently recognized as unlikely to occur. As such, given that protocol surveys for Quino checkerspot butterfly determined that the species is absent from the project site, the proposed project would not result in direct or indirect impacts on this species. However, burrowing owls are known to migrate through the area at different times of the year. As such, the proposed project has the potential to result in direct impacts on burrowing owl (**Impact-BIO-2**).

To address this potentially significant impact, mitigation measure **MM-BIO-2** is proposed and requires take avoidance surveys to ensure potential direct impacts on the species, such as loss of individuals, do not occur. Implementation of this mitigation measure would reduce potential direct impacts on burrowing owl to less than significant.

The field survey also identified suitable habitat and substrate for migratory birds protected under the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code Sections 3503 and 3503.5, including the special status avian species identified above. Permanent direct impacts on migratory and special status birds as a result of the project may include habitat loss, nesting habitat removal, roosting site loss and/or loss of individuals (**Impact-BIO-3**).

To address this potentially significant impact, mitigation measures **MM-BIO-2**, **MM-BIO-3**, and **MM-BIO-4** are proposed. These mitigation measures require take avoidance burrowing owl surveys (**MM-BIO-2**), biological monitoring (**MM-BIO-3**), and pre-construction nesting bird surveys (**MM-BIO-4**). Implementation of these mitigation measures would reduce potential direct impacts on protected avian species to less than significant.

In addition to protected avian species, the field survey identified suitable habitat for special-status mammal, reptile, and amphibian species on the project site. Permanent direct impacts on these vertebrate species as a result of the project may include habitat loss, roosting site loss, and/or loss of individuals (**Impact-BIO-4**). To address this potentially significant impact, mitigation measure **MM-BIO-3** is proposed and requires biological monitoring during construction and would reduce potential direct impacts on protected mammal, reptile, and amphibian species to less than significant.

Lastly, the indirect impacts detailed for mapped habitat types above are equally applicable to special-status wildlife species. However, as described above, these indirect impacts would be less than significant due to the implementation of BMPs and LID stormwater drainage features. As mentioned above, the field survey identified suitable habitat and

substrate for migratory birds protected under the MBTA and California Fish and Game Code Sections 3503 and 3503.5, as well as suitable habitat for numerous other special status mammal, reptile, insect, and amphibian species. Construction-related noise, artificial lighting, and attracting pests and/or predators to the project site could affect these wildlife species by disrupting normal behaviors such as foraging and breeding (**Impact-BIO-5**). However, implementation of mitigation measures **MM-BIO-2**, **MM-BIO-3**, and **MM-BIO-4** would reduce indirect impacts on special-status wildlife to less than significant. These mitigation measures are fully described below.

### **Mitigation Measures**

**MM-BIO-1: Off-site Mitigation.** To offset the loss of 2.55-acres of non-native grassland habitat on the project site, the County of San Diego (County) shall purchase off-site mitigation credits from a County-approved mitigation bank at a 0.5:1 mitigation ratio, consistent with the County's Guidelines for Determining Significance—Biological Resources. The project proponent shall purchase 1.275-acres of non-native grassland habitat credits. If burrowing owls are identified during pre-construction take avoidance surveys (see **MM-BIO-2**), the mitigation ratio shall be increased to 1:1, requiring the purchase of 2.55 acres of non-native grassland habitat credits.

**MM-BIO-2: Burrowing Owl Surveys.** Prior to construction, the County of San Diego shall retain a qualified biologist to conduct pre-construction take avoidance surveys for burrowing owl. The pre-construction take avoidance surveys shall be conducted within 14 days of initiating ground disturbance and/or construction activities per guidelines specified in the Staff Report on Burrowing Owl Mitigation (CDFW 2012). In addition, within 24 hours of initiating ground disturbance and/or construction activities, the qualified biologist shall conduct a final pre-construction take avoidance survey. Surveys shall include areas within the Project footprint and a surrounding 500-foot buffer. The survey shall consist of walking parallel transects and noting any fresh burrowing owl sign or presence. The results of the take avoidance survey shall be provided to the California Department of Fish and Wildlife (CDFW). If more than 14 days pass between the take avoidance survey and initiation of project construction, additional take avoidance survey may be required by the qualified biologist, depending on what actions have been implemented to deter burrowing owls from moving into the project footprint and buffer area.

**MM-BIO-3: Biological Monitoring.** Prior to construction, the County shall retain a biological monitor. The biological monitor shall be present during all initial vegetation clearing, grubbing, and rough grading activities to relocate wildlife out of harm's way, including but not limited to protected birds (including tricolored blackbird and turkey vulture) and American badger. Biological monitoring will ensure the project remains in compliance with any mitigation, monitoring, and compliance reporting program, as well as industry standard Best Management Practices (BMP) such as fugitive dust control, on-site vehicle speed limits, Stormwater Pollution Prevention Plan (SWPPP) implementation, and conditions related to biological resource protection set forth by the County of San Diego and/or regulatory agencies.

**MM-BIO-4: Nesting Bird Avoidance Measures.** Vegetation removal should be conducted outside of the nesting bird season between September 1<sup>st</sup> and January 31<sup>st</sup>. If vegetation removal is required during the nesting bird season (i.e., February 1 and August 31), the County of San Diego shall retain a qualified biologist(s) to conduct a pre-construction avoidance survey for Migratory Bird Treaty Act (MBTA) and California Department of Fish and Wildlife (CDFW)-protected nesting birds within 100 feet of areas proposed for vegetation removal and/or initial grading activities. Additionally, the survey shall be extended to 500 feet for raptors between January 1<sup>st</sup> and July 15<sup>th</sup>. The survey shall be conducted by a qualified biologist(s), defined as someone with familiarity with avian species in the region and at least five years of experience conducting nesting bird surveys, within seven days (i.e., 168 hours) of vegetation removal and/or initial groundbreaking activities. If active, protected nests are observed within the survey area(s), a qualified biologist will determine appropriate minimum disturbance buffers or other adaptive mitigation techniques (e.g., biological monitoring of active nests during construction-related activities, staggered work schedules, altered work locations, sound walls, noise abatement, etc.) and work with the contractor to ensure that direct and indirect impacts on all protected nesting birds are avoided until such nests are no longer active. If the results of the survey are negative, the project will proceed without any further surveys or monitoring as long as there is not a significant lapse (i.e., greater than seven days) in project activity. If more than seven days of inactivity occurs, a new nesting bird survey shall be required prior to reconvening project construction.

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

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

**Discussion/Explanation:**

**No Impact:** As discussed under IV(a) above, Blackhawk conducted a literature review/database search, performed baseline biological resources assessment surveys, assessed existing conditions, and identified special-status species habitat suitability. Vegetation within the project site consists entirely of non-native grassland, which is not considered a sensitive natural community. No riparian habitat or other sensitive natural communities identified in local or regional plans, policies, regulations, or by CDFW were identified during the literature review, and none were found during the field survey. Therefore, no impact would occur.

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

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

**Discussion/Explanation:**

**No Impact:** As discussed under item IV(a) above, Blackhawk conducted a literature review/database search as well as a habitat assessment of the project site on March 13, 2024. The literature review did not yield any National Hydrography Dataset or National Wetland Inventory features within or immediately adjacent to the project site. Additionally, the field survey effort did not identify any ephemeral drainages, vernal pools, or any other isolated water features on the project site. Furthermore, Ascent Environmental biologist Scott Gressard completed an aquatic resources assessment of the project site in March 2024 to determine the extents of any potential jurisdictional resources within the proposed project boundary. The assessment evaluated characteristics that would indicate a particular resource would be under the jurisdiction of the United States Army Corps of Engineers (USACE) pursuant to Section 404 of the federal Clean Water Act (CWA), under the jurisdiction of the Regional Water Quality Control Board (RWQCB) pursuant to CWA Section 401 and the Porter-Cologne Water Quality Control Act, and CDFW pursuant to Sections 1600-1603 of the California Fish and Game Code. The project site consists primarily of non-native grassland within historic agricultural lands and disturbed upland habitat. No portion of the project boundary contains indicators of jurisdictional aquatic resources (e.g., bed and bank, hydrophytic vegetation, etc.). Therefore, the proposed project would not result in any direct impacts on aquatic resources.

Additionally, a north-south running stormwater conveyance channel is approximately 150 feet west of the project boundary. However, the proposed project would be required to implement source control, site design, and structural BMPs per the Regional MS4 Permit. BMPs would be identified from the County's BMP Design Manual and would be implemented in accordance with the County's WPO. The project proposes to include a 20-foot by 165-foot stormwater bioswale to provide stormwater pollution, prevention, and flow control of stormwater generated onsite. This LID feature would ensure proper drainage onsite as well as no adverse indirect impacts on the offsite stormwater conveyance from stormwater runoff during rainy conditions.

For these reasons, the project would not have substantial adverse effects 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. Therefore, no impact would occur.

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

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

Discussion/Explanation:

**Less than Significant with Mitigation Incorporated:** A wildlife corridor is a specific route that is used for migrations of species. A corridor is different from a linkage because it represents a smaller or narrower avenue for movement, whereas a linkage is an area of land which supports or contributes to the long-term movement of wildlife and genetic exchange by providing live-in habitat that connects to other habitat areas. The County of San Diego South County Subarea Plan of the Multiple Species Conservation Program (MSCP) defines regional linkages/corridors as land that “contains topography which serves to allow for the movement of all sizes of wildlife and is used by wildlife, including large animals on a regional scale; contains adequate vegetation cover providing visual continuity so as to encourage the use of the corridor by wildlife; or, has been identified as the primary linkage/corridor between the northern and southern regional populations of the California gnatcatcher in the population viability analysis for the California gnatcatcher.”

The project site is currently undeveloped, as well as the surrounding area to the north, east, and west. As such, the project site could function as a wildlife corridor or linkage. As discussed under item IV(a) above, burrowing owls are known to migrate through the area at different times of the year, and the proposed project therefore has the potential to result in direct impacts on this species. Additionally, the proposed project would have the potential to result in direct impacts on migratory and special status birds protected under the MBTA and California Fish and Game Code Sections 3503 and 3503.5 through habitat loss, nesting habitat removal, roosting site loss and/or loss of individuals. Similarly, the project could result in these direct impacts on special-status mammal, reptile, and amphibian species on the project site. Furthermore, the project would have the potential to result in indirect impacts on migratory birds protected under the MBTA and California Fish and Game Code, as well as other special-status mammal, reptile, insect, and amphibian species. Potential indirect impacts include construction-related noise, artificial lighting, and attracting pests and/or predators to the project site, which could affect these wildlife species by disrupting normal behaviors such as foraging and breeding. Collectively, these direct and indirect impacts would be potentially significant (**Impact-BIO-6**).

To address this potentially significant impact, mitigation measures **MM-BIO-2**, **MM-BIO-3**, and **MM-BIO-4** are proposed. Implementation of these mitigation measures would reduce this potential impact to less than significant by requiring completion of take avoidance burrowing owl surveys (**MM-BIO-2**), biological monitoring (**MM-BIO-3**), and pre-construction nesting bird surveys (**MM-BIO-4**).



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

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

Discussion/Explanation:

**Less than Significant with Mitigation Incorporated:** The project would not conflict with any local policies or ordinances protecting biological resources. As discussed under item IV(a) above, the project would comply with the County's Guidelines for Determining Significance—Biological Resources and the related County Biological Mitigation Ordinance. Moreover, there are no wetlands on the project site and onsite vegetation consists entirely of non-native grassland. The loss of 2.55 acres of non-native grassland habitat would be mitigated by purchasing off-site mitigation credits from a County-approved mitigation bank at a 0.5:1 ratio, as required under **MM-BIO-1**. In the event that occupied burrowing owl burrows are identified during pre-construction take avoidance surveys, **MM-BIO-1** requires the ratio for loss of non-native grassland habitat to be increased to 1:1, for a total of 2.55 acres preserved offsite. Therefore, no sensitive biological resources defined in the County's Resource Protection Ordinance would be significantly impacted. Additionally, there are no trees on the project site that would be removed.

Therefore, the proposed project would not conflict with any local policies or ordinances protecting biological resources, and impacts would be less than significant with incorporation of **MM-BIO-1**.

**f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?**

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

Discussion/Explanation:

**Less-than-Significant Impact:** The proposed project is not located within the boundaries of any adopted Habitat Conservation Plan or Natural Community Conservation Plan. However, the project site is within the planning boundaries for the draft East County Multiple Species Conservation Plan (MSCP), which is still in the planning phase and would extend the County's MSCP into the eastern portion of the unincorporated county, including backcountry communities such as Jacumba. The East County MSCP Planning Area is bounded on the west generally by the western boundary of the Cleveland National Forest, on the north by Riverside County, and on the east predominantly by Imperial

County, and the south by Mexico. Once approved, the East County MSCP would be a joint Natural Community Conservation Program Plan and Habitat Conservation Plan.

Although the East County MSCP is not yet adopted, certain projects and activities within its planning area are subject to the Interim Review Process pursuant to the East County MSCP Planning Agreement (County of San Diego 2021a). The proposed project is not subject to any of the permit types identified in the Interim Review Process. Additionally, the IS/MND will be sent to the wildlife agencies for review and comment during the public review period. Therefore, no conflicts with any such plans would occur with the project, and the project would not conflict with the provisions of a local, regional, or state habitat conservation plan. Impacts would be less than significant, and no mitigation is required.

**V. CULTURAL RESOURCES** – Would the project:

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

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

Discussion/Explanation:

**Less-than-Significant Impact:** Based on an analysis of records and a survey of the property by a County of San Diego approved archaeologist, ASM Affiliates, Inc. (ASM) on March 13, 2024, the project site does not contain any historical resources as defined in CEQA Guidelines Section 15064.5. The results of the records search and survey are included in the Archaeological Survey Report prepared by ASM, which is provided as Appendix B of this IS/MND. According to the Archaeological Survey Report prepared by ASM, the project site is within the Jacumba Valley Archaeological District (JVAD). Although the record search identified one archaeological site (CA-SDI-8072) that directly intersects the proposed project area, CA-SDI-8072 was previously evaluated for significance under CEQA and County Resource Protection Ordinance (RPO) and for eligibility to California Register of Historical Resources (CRHR) by Dudek in 2018-2019 for the JVR Energy Park Project. Dudek recommended that SDI-8072 was not significant under CEQA, not eligible for listing in the CRHR or Local Register, not a significant resource under County RPO, and not considered a contributor to the significance of the JVAD. Based on the survey completed for the proposed project, ASM concurred with this evaluation. Therefore, the project would not cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5. Impacts would be less than significant, and no mitigation is required.

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

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

**Discussion/Explanation:**

**Less than Significant with Mitigation Incorporated:** As discussed under item V(a) above, the project site is within JVAD. ASM conducted a cultural resource record search at the South Coastal Information Center (SCIC) of the California Historical Resources Information System for the proposed project to determine if any previously recorded archaeological sites are present within the project site and a 1-mile radius around the site. Additionally, ASM requested a Sacred Lands File (SLF) search from the Native American Heritage Commission (NAHC). ASM obtained a negative result of the SLF from the NAHC on March 11, 2024.

The record search revealed 67 previously recorded cultural resources within a 1-mile radius of the project site, which includes 53 archaeological sites and 14 isolates. The records search identified one previously recorded archaeological site (CA-SDI-8072) within the project site. The JVAD, including site CA-SDI-8072, directly intersects the project site.

On March 13, 2024, the project site, including site CA-SDI-8072, was surveyed by ASM. No artifacts were identified during the course of the survey. Further research revealed that CA-SDI-8072 was tested for significance under CEQA and County RPO and for eligibility to CRHR by Dudek in 2018-2019 for the JVR Energy Park Project. This study completed a full surface collection and subsurface testing on CA-SDI-8072, including within the current project area. This study excavated five shovel test pits, one Surface Scrap Unit, six auger units and a surface collection of artifacts across CA-SDI-8072. Dudek found that the site had a low potential for significant buried deposits or culturally sensitive materials and recommended that CA-SDI-8072 was not significant under CEQA, not eligible for listing in the CRHR or Local Register, not a significant resource under County RPO, and not considered a contributor to the significance of the JVAD. Accordingly, the County RPO does not apply to the proposed project. Based on the survey completed for the proposed project, ASM concurred with this evaluation.

Although the CA-SDI-8072 is not considered an archaeological resource under CEQA Guidelines Section 15064.5, grading and excavation for the proposed project would result in the potential destruction of possible archaeological material located in the northern half of CA-SDI-8072 within the JVAD. Therefore, given the project's location within JVAD, the presence of CA-SDI-8072 within the project site, and poor ground surface visibility within the site, project construction could result in potentially significant impacts on this archaeological site (**Impact-CUL-1**).

To address this potentially significant impact, mitigation measure **MM-CUL-1** is required. Implementation of this mitigation measure would reduce this impact to less than significant by requiring archaeological and Native American monitoring during all ground-disturbing activities of native soils associated with the project. This mitigation measure is fully described below.

## Mitigation Measures

**MM-CUL-1: Implement Archaeological and Native American Monitoring.** The County of San Diego (County) shall implement an archaeological and Native American monitoring program and potential data recovery program pursuant to the County's *Guidelines for Determining Significance and Report Format and Requirements for Cultural Resources* and the California Environmental Quality Act (CEQA). The archaeological and Native American monitoring program shall be described in a Monitoring and Discovery Plan and shall include the following requirements:

- Pre-Construction
  - Contract with a County approved archaeologist to perform archaeological monitoring and a potential data recovery program during all earth-disturbing activities, including but not limited to trenching for utilities and installation of BMPs and fencing. The Project Archaeologist shall subcontract with participating Tribes ~~Kumeyaay monitor~~ to conduct Native American monitoring for the project. The Project Archaeologist and ~~tribal~~ Kumeyaay Native American monitor shall perform the monitoring duties before, during and after construction.
  - Pre-construction meeting to be attended by the Project Archaeologist and Kumeyaay Native American monitor to explain the monitoring requirements. Participating Tribes shall be invited to pre-construction meeting(s). Any Kumeyaay Native American will be an approved representative of the participating Tribes.
  - Prior to earth disturbing activities, the County shall consult with participating Tribes to identify any Culturally Significant Plants to the Kumeyaay People that may then be incorporated into the final landscape palette for the project.
- Construction
  - **Monitoring.** Both the Project Archaeologist and Kumeyaay Native American monitor are to be onsite during earth disturbing activities. The frequency and location of monitoring of native soils will be determined by the Project Archaeologist in consultation with ~~the a~~ a Kumeyaay Native American monitor. Both the Project Archaeologist and Kumeyaay Native American monitor shall evaluate fill soils to ensure that they are negative for cultural resources. If multiple Kumeyaay Tribes are interested in

participating in the monitoring effort, a daily/weekly rotation shall be developed to allow equal time for observation.

- **Monthly Reporting.** Weekly summaries of activities and results will be shared with participating Tribes. If grading activities exceed one month, the Project Archaeologist shall submit monthly status reports to the County Director of General Services and participating Tribes starting from the date of the notice to proceed to termination of implementation of the grading monitoring program. The reports shall briefly summarize all activities during the period and the status of progress on overall plan implementation.
- If cultural resources are identified during construction monitoring:
  - Both the Project Archaeologist and Kumeyaay Native American monitor have the authority to divert or temporarily halt ground disturbance operations in the area of the discovery.
  - The Project Archaeologist shall contact the County Archaeologist at the time of discovery.
  - The Project Archaeologist in consultation with the County Archaeologist and Kumeyaay Native American shall determine the significance of discovered resources.
  - The Project Archaeologist shall notify the Campo Band of Mission Indians, Manzanita Band of the Kumeyaay Nation, Jamul Indian Village, and La Posta Band of Diegueño Mission Indians of the unanticipated discovery.
  - Should a potential Tribal Cultural Resource (TCR) be identified, the Project Archaeologist shall consult with consulting tribes for a final determination.
  - Construction activities will be allowed to resume after the County Archaeologist has concurred with the significance evaluation.
  - Isolates and non-significant deposits shall be minimally documented in the field. Should the isolates and non-significant deposits not be collected by the Project Archaeologist, the Kumeyaay Native American monitor may collect the cultural material for transfer to a Tribal curation facility, onsite reinterment (if appropriate), or repatriation program.
  - If cultural resources discovered during construction are determined to be significant, a new or modified Research Design and Data Recovery Program shall be prepared by the Project Archaeologist in consultation with the Kumeyaay Native American monitor and approved by the County Archaeologist. The program shall include reasonable efforts to preserve (avoid) unique cultural resources of Sacred Sites; the capping of identified Sacred Sites or unique cultural resources and placement of development over the cap if avoidance is infeasible; and data recovery

for non-unique cultural resources. The preferred option is preservation (avoidance). If data recovery and collection are required, after avoidance and re-design are attempted, an appropriate on-site location or curation facility will be determined in consultation with the participating Tribes.

○ Discovery of Possible Human Remains.

- The Property Owner or their representative shall contact the County Medical Examiner or representative and the Director of General Services when possible human remains are identified. The Project Archaeologist will simultaneously inform the participating Tribes of the find.
- Upon identification of possible human remains, no further disturbance shall occur in the area of the find until the County Medical Examiner has made the necessary findings as to origin. If the human remains are to be taken offsite for evaluation, they shall be accompanied by ~~the a~~ participating Kumeyaay Native American monitor.
- If the remains are determined to be of Native American origin, the Most Likely Descendant (MLD), as identified by the Native American Heritage Commission (NAHC), shall be contacted by the Property Owner or their representative in order to determine proper treatment and disposition of the remains.
- The Project Archaeologist shall notify the Campo Band of Mission Indians, Manzanita Band of the Kumeyaay Nation, Jamul Indian Village, and La Posta Band of Diegueño Mission Indians of the identification of human remains.
- The immediate vicinity where the Native American human remains are located is not to be damaged or disturbed by further development activity until consultation with the MLD regarding their recommendations as required by Public Resources Code Section 5097.98 has been conducted.
- Public Resources Code §5097.98, CEQA §15064.5 and Health & Safety Code §7050.5 shall be followed in the event that human remains are discovered.

● ~~Rough Grading~~

- **Final Monitoring Report.** Upon completion of earth-disturbing activities (e.g., grading, trenching, etc.)~~Rough Grading~~, the Project Archaeologist shall prepare a monitoring report identifying whether resources were encountered.
- **No Resources Encountered.** If no archaeological resources are encountered during earth-disturbing activities, then a final Negative

Monitoring Report substantiating that earth-disturbing activities are completed and no cultural resources were encountered shall be submitted. Archaeological monitoring logs showing the date and time that the monitor was on site and any comments from the Native American Monitor shall be included in the Negative Monitoring Report.

- **Resources Encountered.** If archaeological resources were encountered during the earth disturbing activities, the Project Archaeologist shall provide an Archaeological Monitoring Report stating that the field monitoring activities have been completed, and that resources have been encountered. The report shall detail all cultural artifacts and deposits discovered during monitoring and the anticipated time schedule for completion of the curation and/or repatriation phase of the monitoring.
- A copy of the monitoring report shall be provided to the Director of General Services, South Coastal Information Center, and any culturally-affiliated tribe who requests a copy.
- The Final Monitoring Report will include:

• ~~Final Grading~~

- ~~**Final Report.** The Project Archaeologist shall prepare a final report that documents the results, analysis, and conclusions of all phases of the Archaeological Monitoring Program if cultural resources were encountered during earth-disturbing activities. The report shall include the following, if applicable:~~

- ▶ Department of Parks and Recreation Primary and Archaeological Site forms
- ▶ Daily Monitoring Logs
- ▶ Evidence that all cultural materials have been conveyed as follows:
  - Evidence that all prehistoric materials collected during the archaeological monitoring program have been submitted to a San Diego or Imperial County curation facility or a culturally affiliated Native American Tribal curation facility that meets federal standards per 36 CFR Part 79, and, therefore, would be professionally curated and made available to other archaeologists/researchers for further study. The collections and associated records, including title, shall be transferred to the San Diego or Imperial County curation facility or culturally affiliated Native American Tribal curation facility and shall be accompanied by payment of the fees necessary for permanent curation. Evidence shall be in the form of a letter from the curation facility

stating that the prehistoric archaeological materials have been received and that all fees have been paid.

or

Evidence that all prehistoric materials collected during the grading monitoring program have been repatriated to a Native American group of appropriate tribal affinity and shall be accompanied by payment of the fees necessary, if required. Evidence shall be in the form of a letter from the Native American tribe to whom the cultural resources have been repatriated identifying that the archaeological materials have been received.

- Historic materials shall be curated at a San Diego or Imperial County curation facility and shall not be curated at a Tribal curation facility or repatriated. The collections and associated records, including title, shall be transferred to the San Diego or Imperial County curation facility and shall be accompanied by payment of the fees necessary for permanent curation. Evidence shall be in the form of a letter from the curation facility stating that the historic materials have been received and that all fees have been paid.

~~➤ If no cultural resources are discovered, a Negative Monitoring Report must be submitted stating that the archaeological monitoring activities have been completed. Grading Monitoring Logs must be submitted with the negative monitoring report.~~

~~○ A copy of the final report shall be submitted to the Director of General Services, South Coastal Information Center, and any culturally affiliated tribe who requests a copy.~~

**c) Substantially disturb any human remains, including those interred outside of formal cemeteries?**

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

Discussion/Explanation:

**Less than Significant with Mitigation Incorporated:** The project site is not a formal cemetery and is not near a formal cemetery. Additionally, the project site is not known to be on a burial ground. However, as described in response to V(b) above, grading and excavation for the proposed project would result in the potential destruction of possible archaeological material located in the northern half of CA-SDI-8072 within the JVAD. Therefore, there is a potential that implementation of the project would disturb human remains during ground-disturbing construction activities on the project site (**Impact-CUL-2**).



To address this potentially significant impact, mitigation measure **MM-CUL-1** is required. As described above, implementation of this mitigation measure would reduce this impact to less than significant by requiring archaeological and Native American monitoring during all ground-disturbing activities of native soils associated with the project to ensure that human remains, if encountered, are properly handled.

**VI. ENERGY** – Would the project:

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

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

**Less-than-Significant Impact:** Construction activities would primarily consume nonrenewable energy resources such as oil, diesel, and gasoline through operation of construction equipment, material deliveries, and debris hauling. However, construction-related energy consumption would be temporary, and no permanent new source of energy demand would result from construction activities. In addition, activities involving the use of nonrenewable energy resources would follow construction site BMPs, such as reducing idling time of equipment and vehicles to reduce energy use. While construction of the proposed project components would result in a short-term increase in energy use, construction-related fuel use would have no noticeable effect on peak or baseline demands for energy, and construction design features would further help with energy conservation. The one-time expenditure of fuel is not considered a wasteful or inefficient use of nonrenewable resources.

Project operation would primarily require energy for the operations and maintenance of the fire station and associated facilities. The proposed project components would be designed, constructed, operated, and maintained in compliance with the County Policy G-15, which encourages green building design and operation, setting environmental standards that maximize energy efficiency and resource conservation. The proposed project would be designed to achieve USGBC LEED Gold rating, would include water efficient landscaping and electric vehicle charging stations, and would utilize building materials and construction methods that reduce embodied carbon in order to reduce overall greenhouse gas emissions during the pre-occupancy phase. Additionally, the project would pursue Zero Net Energy construction supported by a 550-kW onsite PV solar array to power the fire station and energy use enhancements beyond California Energy Code Title 24. As such, the project would use renewable energy for its electricity needs. These design features would ensure that the project would not result in significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources during project operations.

Therefore, the construction and operation of the proposed project would not result in wasteful, inefficient, or unnecessary consumption of energy resources. This impact would be less than significant.

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

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

**Less-than-Significant Impact:** State and local agencies regulate the use and consumption of energy through various policies and programs. California has adopted a number of bills and regulations, which seek to reduce GHG emission throughout the state. The 2022 Scoping Plan for Achieving Carbon Neutrality (2022 Scoping Plan) lays out a path to achieve targets for carbon neutrality and reduce anthropogenic greenhouse gas (GHG) emissions by 85 percent below 1990 levels no later than 2045, as directed by Assembly Bill 1279.

Energy resources consumed during the construction of the proposed project would be predominantly combustion of petroleum-based fuels from vehicle and equipment use. Project construction would result in a one-time expenditure of energy use, including diesel fuel and gasoline. Energy demand during project operations would be minimized through compliance with the California Green Building Standards Code - Part 11, Title 24 (CALGreen) and the Building Energy Efficiency Standards - Title 24 would ensure that construction would be consistent with State and local energy plans and policies to reduce energy (DGS 2023).

The proposed project would not conflict with or obstruct any State or local plan for renewable energy or energy efficiency and would adhere to the initiatives of the County General Plan, including Conservation and Open Space Element Policy COS-15.5 (Design and Construction of New Buildings), which requires that new buildings be designed and constructed in accordance with “green building” programs that incorporate techniques and materials that maximize energy efficiency, incorporate the use of sustainable resources and recycled materials, and reduce emissions of GHGs and toxic air contaminants. In addition, the proposed project would not interfere with San Diego Gas and Electric’s (SDG&E’s) commitment to sustainability and their goal of achieving net zero GHG emissions by 2045 and would not result in a wasteful or inefficient expenditure of SDG&E resources (SDG&E 2023). Moreover, the project includes a 550 kW PV solar array to power fire station operations, which would reduce reliance on SDG&E-provided energy.

The proposed project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency because it would implement energy reduction design features and comply with the most recent energy building standards consistent with applicable plans and policies. This impact would be less than significant.

**VII. GEOLOGY AND SOILS** – Would the project:

**a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:**

- i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

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

Discussion/Explanation:

**No Impact:** The project site is in the seismically active region of southern California where several known faults exist. The project site lies within the Peninsular Ranges physiographic province, which consists of a series of northwest-southeast trending mountain ranges separated by long valleys, formed by the faults of the southern San Andreas fault system. The major southern California fault systems include the San Andreas, San Jacinto, Elsinore, and Imperial fault zones to the east and north; the San Clemente, Coronado Bank, and Rose Canyon fault zones to the west; and the Agua Blanca and San Miguel fault zones to the south. The closest active fault is the Laguna Salada section of the Elsinore fault zone, mapped approximately 16 miles to the east of the project site. Faults that could produce strong shaking in the project area include the Elsinore fault zone, San Jacinto fault zone, and San Andreas fault zone. Several, mostly northwest trending faults have been mapped in the project area. These faults offset Miocene and older bedrock units. They were not mapped as Holocene active. These bedrock faults are due to the Miocene-age intrusive events that resulted in volcanic peaks, cones, and vents. In addition, there is a linear escarpment along the west side of the Jacumba Mountains approximately 4 miles east of the project area that has been mapped as a fault and that may be associated with a series of microseismic events. This fault trends northeast, and the geomorphic expression along the fault suggests limited Quaternary-age fault surface rupture activity and no evidence of active fault rupture.

Although there are multiple fault zones in the region, there are no known active faults underlying the project site or in the project vicinity, and the project site is not within an Alquist-Priolo Earthquake Fault Zone or any other area with substantial evidence of a known fault (Universal Engineering Services 2024). As such, construction and operation of the proposed project would not exacerbate or otherwise cause the rupture of a known earthquake fault that could directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death. Therefore, no impact would occur.

**ii. Strong seismic ground shaking?**

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

Discussion/Explanation:

**Less-than-Significant Impact:** As discussed above, the project site is in a known seismically active region where the potential for seismic hazards exists. Although there are no active or potentially active faults underlying the project site, the southern California region is seismically active. A seismic event from a nearby fault could cause substantial ground shaking on the project site. However, to ensure the structural integrity of all buildings and structures, the project would be required to comply with all seismic-safety requirements outlined in the current California Building Code (CBC), and would incorporate recommended design measures, as applicable, to reduce potential damage from a seismic event. Compliance with these standards would reduce hazards associated with strong seismic ground shaking and ensure that the project would not exacerbate or otherwise cause potential substantial adverse effects, including the risk of loss, injury, or death from strong seismic ground shaking. Impacts would be less than significant, and no mitigation is required.

**iii. Seismic-related ground failure, including liquefaction?**

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

Discussion/Explanation:

**Less-than-Significant Impact:** The following information is summarized from the Geotechnical Investigation prepared for the project by Universal Engineering Services (Universal Engineering Services 2024). Liquefaction occurs when saturated fine-grained sands or silts lose their physical strength during earthquake-induced shaking and behave like a liquid. This is due to loss of point-to-point grain contact and transfer of normal stress to the pore water. Liquefaction potential varies with water level, soil type, material gradation, relative density, and probable intensity and duration of ground shaking. Seismic settlement can occur with or without liquefaction; it results from densification of loose soils. The secondary effects of liquefaction include sand boils, soil strength loss, and associated phenomena.

According to the County of San Diego Hazard Mitigation Planning Map, the site is within a mapped zone of potential liquefaction susceptibility. As such, the Geotechnical Investigation prepared for the project included a liquefaction and seismic settlement analysis. Based on direct measurement during the subsurface exploration conducted for the Geotechnical Investigation, groundwater was encountered at a depth of 53 feet below

ground surface (bgs) within the project boundaries. Given the available information and regional conditions, a conservative high groundwater depth of 40 feet bgs was modeled for the liquefaction analysis. The Geotechnical Investigation concluded that, based on the depth and distribution of the potential liquefiable layers, surface effects are generally not anticipated. Given the regional conditions and lack of free faces<sup>2</sup> adjacent to the site, the potential hazard associated with lateral spreading is anticipated to be low and no mitigation is required.

Additionally, strong ground motion can cause the densification of soils, resulting in settlement of the ground surface. This phenomenon is known as seismically induced settlement or seismic compaction, which typically occurs in dry, loose cohesionless soils. During an earthquake, soil grains may become more tightly packed due to the collapse of voids or pore spaces, resulting in a reduction in the thickness of the soil column. The Geotechnical Investigation prepared for the project did not identify potential hazards associated with seismically induced settlement and no mitigation is required.

As such, construction and operation of the proposed project would not exacerbate or otherwise cause a hazard associated with seismic-related ground failure, including liquefaction. Impacts would be less than significant.

**iv. Landslides?**

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

**Discussion/Explanation:**

**No Impact:** As indicated in the project's Geotechnical Investigation (Universal Engineering Services 2024), no known landslides are mapped in the vicinity of the site, and the project area is essentially flat. As such, landslides are not considered to be a hazard to the proposed project, nor would the project exacerbate landslide hazards. Therefore, the project would not exacerbate or otherwise cause potential substantial adverse effects, including the risk of loss, injury, or death from landslides. No impact would occur.

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

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

---

<sup>2</sup> An outcrop of rock which is too steep for the accumulation of soil and rock debris

Discussion/Explanation:

**Less-than-Significant Impact:** Projects within the County are required to design storm drainage system to meet the standards in the County's Hydraulic Design Manual and employ BMPs from the County's BMP Design Manual to avoid significant erosion impacts. Additionally, project-specific plans are required to be prepared in accordance with the County's WPO and the BMP Design Manual to avoid or minimize water quality impacts. The County's BMP Design Manual establishes standards for new development to minimize runoff and maximize infiltration and contains mandatory measures that development projects must employ to address pollutant control and hydromodification management, and therefore reduce the level of significance of effects related to on- or off-site erosion. The County also maintains the Grading Ordinance. Projects within the County are subject to the provisions of the Grading Ordinance to protect development sites against erosion and instability and must demonstrate compliance with the Grading Ordinance on development plans.

The project proposes the construction and operation of a new fire station on a 2.77-acre portion of a currently undeveloped, vacant 5-acre property in the unincorporated community of Jacumba. Construction of the proposed project would involve the use of heavy equipment, grading, paving, and other typical construction activities that could modify existing drainage patterns if not properly addressed and result in substantial erosion on or offsite. Pollutants associated with construction activities typically include soils, debris, fuels and other fluids associated with the equipment used for construction, paints, concrete slurries, and asphalt materials. The project would also construct LID stormwater drainage features. Specifically, the project proposes to include a 20-foot by 165-foot stormwater bioswale/infiltration basin to provide stormwater pollution, prevention, and flow control of stormwater generated onsite. This LID feature would ensure proper drainage onsite that would avoid significant erosion during the project-operational phase.

Overall, the project will implement site design measures, source control, and/or treatment control BMPs, consistent with the County's BMP Design Manual and the WPO to ensure significant erosion and/or siltation do not occur. These measures will satisfy waste discharge requirements as required by the MS4 permit (SDRWQCB Order No. R9-2013-0001, as amended by Order Nos. R9-2015-0001 and R9-2015-0100), as implemented by the San Diego County Jurisdictional Urban Runoff Management Program (JURMP) and Standard Urban Storm Water Mitigation Plan (SUSMP). Therefore, impacts related to the potential to result in substantial erosion would be less than significant, and no mitigation is required.

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

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

Discussion/Explanation:

**Less-than-Significant Impact:** Please see the discussion under VII (a)(iii) and (iv) above. As discussed, there is little to no potential for landslides, liquefaction, or lateral spreading (Universal Engineering Services 2024). Moreover, given the geologic and hydrogeologic setting of the site, the potential for subsidence is low.

Loose granular soils can be subject to collapse due to wetting and/or inundation. Collapse can occur in dry granular soils that have an unstable soil structure due to deposition or irrigation processes, typically with a skeletal structure that is weakly cemented by soluble salts or clay. Increases in moisture content, especially due to irrigation or drainage near proposed buildings, can cause the inter-particle cementation to reduce, causing changes in volume (collapse), especially when loaded. The alluvial soils at the site are generally comprised of granular, sandy material and the blow counts indicate the alluvium is generally medium dense material. Therefore, the potential for collapsible soils to impact the proposed improvements is considered low. As such, impacts related to being located on a geologic unit or soil that is unstable or would become unstable as a result of the project would be less than significant, and no mitigation is required.

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

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

Discussion/Explanation:

**Less-than-Significant Impact:** The alluvial soils at the site are generally granular and composed primarily of sandy material. Expansive clays were not observed during the geotechnical investigation; thus, the potential for expansion at the site is considered low (Universal Engineering Services 2024). Therefore, the proposed project would not be located on expansive soil that would potentially exacerbate or otherwise cause risks to life or property. Impacts would be less than significant, and no mitigation is required.

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

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

Discussion/Explanation:

**Less-than-Significant Impact:** As discussed under VII (a)(iii) and (iv), (c), (d), and (e), there are no geologic hazards that would preclude development of the proposed project. As stated, groundwater is estimated to occur at a minimum depth of 30 feet. No expansive clays were observed during the geotechnical investigation. In addition, there is a low potential for collapse of soils, liquefaction, and lateral spreading. As such, the project site would be able to support a septic system and no significant adverse geology or soil-related impacts would occur as a result of its installation. Impacts would be less than significant, and no mitigation is required.

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

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

Discussion/Explanation:

**Less-than-Significant Impact:** According to the project's Preliminary Geotechnical Investigation for the project, the project site is underlain by quaternary young alluvium (Qya) and beyond that the older Jacumba Volcanics and Table Mountain Formation. However, the Jacumba Volcanics and Table Mountain Formation were only encountered at depths of 77 feet bgs in the temporary water well boring conducted as part of the geotechnical investigation (Universal Engineering Services 2024). As such, excavation during project construction would not extend into the underlying Jacumba Volcanics and Table Mountain Formation. Additionally, a review of the County's Paleontological Resources Maps indicates that the project site has a paleontological resource sensitivity of zero to low, and therefore has a low potential for producing fossil remains. The site does not contain any unique geologic features that have been listed in the County's Guidelines for Determining Significance for Unique Geology Resources (County of San Diego 2007b) nor does the site support any known geologic characteristics that have the potential to support unique geologic features. Impacts would be less than significant, and no mitigation is required.



**VIII. GREENHOUSE GAS EMISSIONS** – Would the project:

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

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

Discussion/Explanation:

**Less-than-Significant Impact.** Certain gases in the earth's atmosphere, classified as GHGs, play a critical role in determining the earth's surface temperature. Solar radiation enters the earth's atmosphere from space. Most solar radiation passes through GHGs; however, infrared radiation is absorbed by these gases. As a result, radiation that otherwise would have escaped back into space is instead "trapped," resulting in a warming of the atmosphere. This phenomenon, known as the greenhouse effect, is responsible for maintaining a habitable climate on earth.

Prominent GHGs contributing to the greenhouse effect are CO<sub>2</sub>, methane (CH<sub>4</sub>), nitrous oxide (N<sub>2</sub>O), hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride. GHG emissions contributing to global climate change are attributable, in large part, to human activities associated with on-road and off-road transportation, industrial/manufacturing, electricity generation by utilities and consumption by end users, residential and commercial on-site fuel usage, and agriculture and forestry. It is "extremely likely" that more than half of the observed increase in global average surface temperature from 1951 to 2010 was caused by the anthropogenic increase in GHG concentrations and other anthropogenic factors together (IPCC 2014: 5).

The County of San Diego does not currently have any approved quantitative thresholds related to GHG emissions. Therefore, the quantitative analysis provided herein relies upon the South Coast Air Quality Management District (SCAQMD) adopted screening threshold for industrial projects of 10,000 metric tons of carbon dioxide equivalent (MTCO<sub>2e</sub>) (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). Additionally, the relative mix of GHG sources in the two regions is similar. Cumulative GHG impacts would be potentially significant and require further analysis if the project results in emissions that exceed 10,000 MTCO<sub>2e</sub> beyond current baseline emissions.

The proposed project involves the construction and operation of a new 8,500 square foot fire station and associated facilities on an approximately 2.77-acre portion of an undeveloped 5-acre property. GHG emissions associated with project construction were quantified using CalEEMod. The CalEEMod input data, included in this report as Appendix D, lists the assumed equipment to be used for project construction, the duration of each phase, and changes to default settings that were made for project-specific

conditions. Construction activities would be temporary and intermittent in nature occurring in phases between January 2026 and April 2027, and would involve site preparation, grading, and excavation for building foundations, driveways, and utilities. Sources such as heavy-duty off-road equipment, trucks hauling materials to and from the site, and construction worker commutes would all generate construction related GHG exhaust emissions. Given that exhaust emissions from the construction equipment fleet are expected to decrease over time as stricter standards take effect, construction emissions were estimated using the earliest calendar year when construction would begin to generate conservative estimates. If construction occurs in later years, it is anticipated that advancements in engine technology, retrofits, and turnover in the equipment fleet are to result in lower levels of emissions.

Regarding project operations, the proposed fire station would replace the existing Jacumba fire station located at 1255 Jacumba Street, approximately 0.6 miles west of the project site. The new station would cover the same service area, would be staffed by the same number of daily employees, and the number of calls is not anticipated to change. The new fire station would be built in accordance with Policy G-15 Design Standards for County Facilities and Property, which encourages green building design and energy efficiency. The proposed project would be designed to achieve USGBC LEED Gold rating, would pursue Zero Net Energy construction supported by PV solar arrays and energy use enhancements beyond California Energy Code Title 24, would include water efficient landscaping and electric vehicle charging stations, and would utilize building materials and construction methods that reduce resource consumption.

While the change in emissions between the existing and new fire station would be minimal, for purposes of presenting a conservative analysis, emissions associated with operation of the new fire station were considered new emissions.<sup>3</sup> Operational emissions were quantified using CalEEMod, Version 2022.1.1.13, using a combination of project-specific information regarding vehicle trips and utility consumption, as well as model defaults. Additional details are available in Appendix D and GHG emission estimates from construction and operation are summarized in Table 6.

**Table 6 Estimated Annual GHG Emissions**

Category	MTCO <sub>2</sub> e/year
<b>Construction</b>	
2026	286
2027	19

<sup>3</sup> Please note that the analysis does not consider emissions from existing operations and treats all proposed activities and their associated emissions as new. This is a very conservative approach and has been done for impact purposes only due to the small quantity of operational emissions associated with the new fire station. If greater emissions were anticipated, the analysis would identify the net change in emissions when compared to emissions from the existing fire station.

Category	MTCO <sub>2</sub> e/year
<b>Total Construction Emissions</b>	<b>305</b>
<b>Operation</b>	
Area	<0.1
Energy	17
Mobile	2
Waste	3
Water	6
<b>Total Operation Emissions</b>	<b>28</b>
<b>Total Emissions (Construction Plus Operation)</b>	<b>333</b>
SCAQMD Screening Threshold	10,000
<b>Exceed Threshold</b>	<b>No</b>

Note: Values may not add up due to rounding.

Source: Ascent 2024.

As shown in Table 6, total emissions from construction and operation emissions were estimated to be well below relevant thresholds, including SCAQMD's 10,000 MTCO<sub>2</sub>e threshold. No additional analysis is required. Therefore, the project would not generate GHG emissions that may have a significant impact on the environment. This impact would be less than significant, and no mitigation is required.

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

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

Discussion/Explanation:

**Less-than-Significant Impact.** State and local agencies regulate the use and consumption of energy through various policies and programs. The California Global Warming Solutions Act of 2006 (AB 32), which seeks to reduce the effects of GHG emissions, helped establish the foundation for most of the State regulations intended to reduce energy use and GHG emissions. Senate Bill 375 (SB 375), passed in 2008, links transportation and land use planning with global warming. It requires CARB to set regional targets for the purpose of reducing GHG emissions from passenger vehicles. Under this law, if regions develop integrated land use, housing, and transportation plans that meet SB 375 targets, new projects in these regions can be relieved of certain review requirements under CEQA. On September 8, 2016, the Governor signed Senate Bill 32 (SB 32), which established a midterm target between 2020 and 2050 that helps frame the

suite of policy measures, regulations, planning efforts, and investments in clean technologies and infrastructure needed to continue driving down GHG emissions. On August 31, 2022, the California Legislature passed Assembly Bill 1279 (AB 1279), which requires California to achieve “net zero greenhouse gas emissions” as soon as possible, but no later than 2045, and to achieve and maintain net negative GHG emissions thereafter. It also requires that statewide anthropogenic GHG emissions be reduced to at least 85 percent below 1990 levels. The bill directs CARB to ensure that its scoping plan identifies and recommends measures to achieve these policy goals. It also directs CARB to identify policies and strategies to enable carbon capture, storage, and utilization, and CO<sub>2</sub> removal technologies to complement emission reductions to achieve the bill’s neutrality goals. The County of San Diego has also adopted various GHG-related goals and policies in the General Plan.

CARB adopted the *2022 Scoping Plan for Achieving Carbon Neutrality* (2022 Scoping Plan) on December 16, 2022, establishing the state’s the pathway to achieve carbon neutrality and an 85 percent reduction in 1990 emissions goal by 2045 using a combined top-down, bottom-up approach under various scenarios (CARB 2022). The 2022 Scoping Plan identifies the reductions needed by each GHG emission sector (e.g., transportation [including off-road mobile source emissions], industry, electricity generation, agriculture, commercial and residential, pollutants with high global warming potential, and recycling and waste) to achieve these goals. The proposed project would comply with any mandate or standards set forth by the 2022 Scoping Plan.

SANDAG plans are developed based on land use, population, and commercial/industrial growth projections from local jurisdictions in the region, including the County of San Diego. The County of San Diego General Plan was approved in 2011 and includes strategies that focus growth into mixed-use activity centers that are pedestrian friendly and linked to an improved regional transit system. Projects consistent with the County of San Diego’s General Plan would be considered to comply with the planning efforts in the SANDAG Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), which was designed to achieve the region’s fair-share GHG emission reductions pursuant to SB 32 and SB 375. Therefore, projects consistent with the County of San Diego’s General Plan would also be consistent with the GHG emission reduction goals of the 2022 Scoping Plan. Since the proposed project is a relocation of existing land uses, vehicle trips and other project activities would be included in the assumptions for the General Plan, RTP/SCS, and 2022 Scoping Plan.

To implement State mandates to address climate change in local land use planning, local land use jurisdictions are generally preparing GHG emission inventories and reduction plans and incorporating climate change policies into local General Plans to ensure development is guided by a land use plan that reduces GHG emissions. The County of San Diego’s General Plan incorporates various climate change goals and policies. The project’s consistency with specific General Plan Conservation and Open Space Element policies is provided in Table 7.

**Table 7 County General Plan Policies**

<b>Policy</b>	<b>Project Consistency</b>
<b><i>COS14.3 Sustainable Development.</i></b> Require design of residential subdivisions and nonresidential development through “green” and sustainable land development practices to conserve energy, water, open space, and natural resources.	<b>Consistent.</b> The project would meet this requirement as part of its compliance with the CALGreen Code.
<b><i>COS14.10 Low Emission Construction Vehicles and Equipment.</i></b> Require County contractors and encourage other developers to use low-emission construction vehicles and equipment to improve air quality and reduce GHG emissions.	<b>Consistent.</b> The project would be consistent with this policy and would use low- emission construction vehicles and equipment in accordance with Policy G-15.
<b><i>COS15.1 Design and Construction of New Buildings.</i></b> Require that new buildings be designed and constructed in accordance with “green building” programs that incorporate techniques and materials that maximize energy efficiency, incorporate the use of sustainable resources and recycled materials, and reduce emissions of GHGs and toxic air contaminants.	<b>Consistent.</b> The project would meet this requirement as part of its compliance with the CALGreen Code and in accordance with Policy G-15.
<b><i>COS15.4 Title 24 Energy Standards.</i></b> Require development to minimize energy impacts from new buildings in accordance with or exceeding Title 24 energy standards.	<b>Consistent.</b> The project would pursue Zero Net Energy construction supported by PV solar arrays and energy use enhancements beyond California Energy Code Title 24.

As discussed in Section VII(a) above, the project would replace an existing station and project emissions would be minimal and well below thresholds. Furthermore, as depicted by Table 7 above, the project would not conflict with the County’s GHG goals and policies of the General Plan. Therefore, the project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases; therefore, the impact would be less than significant.

**IX. HAZARDS AND HAZARDOUS MATERIALS** – Would the project:

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

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

Discussion/Explanation:

**Less-than-Significant Impact:** The proposed project involves the construction and operation of a new fire station on a 2.77-acre portion of a currently undeveloped, vacant 5-

acre property in the unincorporated community of Jacumba. Construction of the project would involve the routine transport, use, and disposal of hazardous materials typically used in construction, including paints, oils, solvents, fuels, lubricants, asphalt products, and other materials. Hazardous waste generated during construction may consist of welding materials, fuel and lubricant containers, paint and solvent containers, and cement products containing strong basic or acidic chemicals. All hazardous materials would be used, stored, handled, and disposed of according to the manufacturers' recommendations and in accordance with local, state, and federal regulations. These regulations include the Hazardous Materials Transportation Act, Resource Conservation and Recovery Act, the California Hazardous Material Management Act, and the California Code of Regulations, Title 22. Because the project site is currently undeveloped, the project does not propose to demolish any existing structures onsite and therefore would not create a hazard related to the release of asbestos, lead based paint or other hazardous materials from construction-related activities.

The San Diego County Department of Environmental Health and Quality Hazardous Materials Division (DEHQ HMD) is the Certified Unified Program Agency (CUPA) for San Diego County responsible for enforcing Chapter 6.95 of the Health and Safety Code. As the CUPA, the DEHQ HMD is required to regulate hazardous materials business plans and chemical inventory, hazardous waste and tiered permitting, underground storage tanks, and risk management plans. The Hazardous Materials Business Plan is required to contain basic information on the location, type, quantity and health risks of hazardous materials stored, used, or disposed of onsite. The plan also contains an emergency response plan which describes the procedures for mitigating a hazardous release, procedures and equipment for minimizing the potential damage of a hazardous materials release, and provisions for immediate notification of the HMD, the Office of Emergency Services, and other emergency response personnel such as the local Fire Agency having jurisdiction. Additionally, the California Accidental Release and Prevention Program (CCR Title 19, Division 2, Chapter 4.5) ensures that accidental release scenarios are considered and that measures are included to reduce the risk of accidental spills. Compliance with these regulations would ensure that operation of the project would not cause a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. Therefore, operation-related impacts would be less than significant, and no mitigation is required.

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

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

Discussion/Explanation:

**Less-than-Significant Impact:** The project site is currently vacant and undeveloped. As described above, neither construction nor operation of the proposed project would involve the routine transport, use, and disposal of substantial amounts of hazardous materials. During construction of the proposed project, standard construction controls and safety procedures would be implemented in accordance with the applicable federal and state regulations described above to minimize the risk of accidental release. The project would not involve the on-site storage of substantial amounts of hazardous materials, and the risk associated with an accidental release is low due to the small volume and low concentration of any materials that could be present. Therefore, due to the strict local, state, and Federal hazardous material-related requirements outlined under Section IX(a) above, the project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and/or accident conditions involving the release of hazardous materials into the environment. Therefore, impacts would be less than significant, and no mitigation is required.

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

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

Discussion/Explanation:

**No Impact:** The project is not located within one-quarter mile of an existing or proposed school. The closest school to the project site is Clover Flat Elementary School, which is located approximately 7 miles to the northwest in the unincorporated community of Boulevard. Therefore, the project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. No impact would occur.

**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?**

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

Discussion/Explanation:

**No Impact:** A review of regulatory databases compiled pursuant to Government Code Section 65962.5 was conducted to document the locations of known hazardous waste sites, landfills, leaking underground storage tanks, permitted facilities that utilize underground storage tanks (USTs), and facilities that use, store, or dispose of hazardous materials/wastes. The database search included a review of the Environmental Data Resources (EDR), State Water Resource Control Board's (SWRCB) GeoTracker, and California Department of Substances Control (DTSC) EnviroStor databases. The GeoTracker database consists of records related to contaminated property investigations involving leaking underground storage tanks (LUSTs); spills, leaks, investigations, and cleanups (SLIC); land disposal; Department of Defense (non-UST), wells; and registered underground storage tank (UST) sites throughout California. The EnviroStor database consists of federal National Priority List sites, voluntary cleanup sites, and school cleanup sites. The project site was not listed on either the GeoTracker database or the EnviroStor database (SWRCB 2024; DTSC 2024). Additionally, a review of the EDR database did not identify any open hazardous materials cases within 0.5-mile of the project site. Therefore, no impact would occur.

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

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

Discussion/Explanation:

**Less-than-Significant Impact:** The proposed project is located 0.5-mile west of the existing Jacumba Airport property. The proposed project is anticipated to be in conformance with the Federal Aviation Administration Regulations, Part 77 – Objects Affecting Navigable Airspace and would comply with any FAA notification requirements. Additionally, the project is in compliance with the ALUCP, is outside of the airport safety zones boundaries identified in Figure 2-1 of the ALUCP, and does not propose any distracting visual hazards such as distracting lights, sources of smoke or other obstacles or an electronic hazard that would interfere with aircraft instruments or radio



communications. Furthermore, the height of the new fire station building would not exceed 30 feet, including any roof-mounted mechanical equipment, and the height of the communications antenna would not exceed 40 feet. Finally, the project does not propose any artificial bird attractor, including but not limited to reservoirs, golf courses with water hazards, large detention and retention basins, wetlands, landscaping with water features, wildlife refuges, or agriculture (especially cereal grains). Therefore, the project would not result in an airport-related safety hazard for people residing or working in the project area. Impacts would be less than significant, and no mitigation is required.

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

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

**Discussion/Explanation:**

**No Impact:** The Operational Area Emergency Plan is a comprehensive emergency plan that defines responsibilities, establishes an emergency organization, defines lines of communications, and is designed to be part of the statewide Standardized Emergency Management System. The Operational Area Emergency Plan provides guidance for emergency planning and requires subsequent plans to be established by each jurisdiction that has responsibilities in a disaster situation. The Multi-Jurisdictional Hazard Mitigation Plan includes an overview of the risk assessment process, identifies hazards present in the jurisdiction, hazard profiles, and vulnerability assessments. The plan also identifies goals, objectives, and actions for each jurisdiction in the County of San Diego, including all cities and the County unincorporated areas.

The proposed project involves the construction and operation of a new fire station to serve Jacumba and the surrounding area. The new fire station would replace the existing fire station currently serving the area. During construction of the project, the existing fire station would continue to operate and respond to emergencies until the new fire station is complete and operational. Additionally, except for two new curb cuts and driveways to access the proposed fire station, the project would not result in any changes to Old Highway 80, which is the primary ingress/egress route for Jacumba and would be used by emergency responders and the public in the event of an evacuation. The addition of two new curb cuts and driveways on Old Highway 80 would not impede emergency response or evacuation. Therefore, the project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. No impact would occur.

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

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

Discussion/Explanation:

**Less-than-Significant Impact:** The proposed project would involve the construction and operation of a new fire station, which would replace the existing fire station currently serving the Jacumba community and surrounding area. The project site is located within an area of the county classified as a high fire hazard severity zone (CAL FIRE 2023). However, the proposed new fire station would not exacerbate wildfire risk; rather, it would provide the Jacumba community and surrounding area with a new, modern fire station that would enhance the ability of CAL FIRE to respond to wildfires and other emergencies. There would be no interruption to existing fire service availability or response during construction of the proposed project. Additionally, because the project would replace the existing Jacumba fire station, it would not introduce new employees or residents to the area, and therefore would not increase exposure of people to wildland fires and related hazards. Furthermore, the project would be implemented in compliance with all applicable state and County requirements related to wildfire hazards (i.e., the California Fire Code and Consolidated Fire Code, respectively), including maintaining defensible spaces and incorporating fire-resistant building materials into the design of the fire station. Therefore, this impact would be less than significant.

**X. HYDROLOGY AND WATER QUALITY – Would the project:**

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

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

Discussion/Explanation:

**Less-than-Significant Impact:** The San Diego RWQCB is responsible for developing and enforcing water quality objectives and implementing plans that will best protect San Diego's waters while recognizing our local differences in climate, topography, geology and hydrology. The CWA authorizes the NPDES Permit Program, which controls water pollution by regulating point sources that discharge pollutants into waters of the United States. Point sources are discrete conveyances such as pipes or man-made ditches. The San Diego RWQCB adopted the NPDES Regional Municipal Separate Storm Sewer Systems (Regional MS4) Permit that covers San Diego County Co-permittees. As a co-permittee, the County was required to develop and regularly update Runoff Management

Plans and Programs, including Water Quality Improvement Plans and a Jurisdictional Management Program. Permit requirements in the County are generally implemented through the County's WPO. In addition, the County's BMP Design Manual provides specific guidance and measures for land development and public improvement projects to comply with the Regional MS4 Permit. As such, project-specific plans are required to be prepared in accordance with the County's WPO and BMP Design Manual to ensure compliance with the Regional MS4 permit (County of San Diego 2021b).

Additionally, construction projects that disturb 1 acre or more of land must obtain coverage under the SWRCB Construction General Permit (Order 2009-0009-DWQ as amended by Order 2010-0014-DWQ and Order 2012-006-DWQ). Under the terms of the permit, applicants must file complete and accurate Notice of Intent and Permit Registration Documents with the SWRCB. Applicants must also demonstrate conformance with applicable construction BMPs and prepare a construction Storm Water Pollution Prevention Plan (SWPPP) containing a site map that shows the construction site perimeter, existing and proposed buildings, lots, roadways, stormwater collection and discharge points, general topography both before and after construction, and drainage patterns across the project site.

Finally, the Regional MS4 Permit (see provision E.3.b) identifies additional construction, source control, site design, and structural BMP requirements for projects that meet the definition of a Priority Development Project (PDP). Common examples of a project that meets the definition of a PDP are projects that would result in 10,000 square feet or more of impervious services or projects that would disturb one or more acres of land. The County's PDP Stormwater Quality Management Plan (SWQMP) must be completed by the applicant and approved by the County.

The proposed project is located in the Jacumba Valley subbasin of the Anza Borrego hydrologic unit. The project proposes the construction and operation of a new fire station on a 2.77-acre portion of a currently undeveloped, vacant 5-acre property in the unincorporated community of Jacumba. Construction of the proposed project would involve the use of heavy equipment, grading, paving, and other typical construction activities that could adversely affect water quality standards or waste discharge requirements if not properly addressed. Pollutants associated with construction activities typically include soils, debris, fuels and other fluids associated with the equipment used for construction, paints, concrete slurries, and asphalt materials. These pollutants would degrade water quality if they were carried by stormwater or other runoff into surface waters. However, the project site is not in the vicinity of any surface waterbodies, including lakes, rivers, creeks, or streams that could be affected by stormwater runoff during project construction and operation.

Because project construction would involve more than one acre of ground disturbance, it would be subject to the Construction General Permit and its requirements, including the preparation and implementation of a SWPPP. The SWPPP would identify BMPs that must be implemented to reduce the potential for pollutants from construction to degrade water

quality, including BMPs that minimize disturbance, reduce erosion, and limit or prevent various pollutants from entering surface water runoff.

Following project construction, operation of the new fire station could have the potential to degrade water quality through non-point source pollution into groundwater bodies. Because the project site is currently undeveloped, the proposed project would result in new impervious surfaces that would increase urban runoff containing oil, grease, metals, pathogens, TDS, sediments, or toxic chemicals, which could degrade water quality if they enter surface or groundwater bodies.

Based on the County's PDP SWQMP guidance, the project would be considered a PDP because it would disturb more than 1 acre of land. Consequently, the proposed project would be required to implement construction, source control, site design, and structural BMPs to ensure water quality is not degraded. BMPs would be identified from the County's BMP Design Manual and would comply with the County's WPO.

Finally, the project would propose LID stormwater drainage features. Specifically, the project proposes to include a 20-foot by 165-foot stormwater bioswale to provide stormwater pollution, prevention, and flow control of stormwater generated onsite. This LID feature would ensure proper drainage onsite as well as no adverse impacts on water quality resulting from stormwater runoff from the proposed structures during rainy conditions. Compliance with applicable regulations and implementation of construction and post-construction BMPs would ensure that the proposed project would not violate any water quality standards or waste discharge requirements, or otherwise substantially degrade surface water quality. Impacts would be less than significant, and no mitigation is required.

**b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?**

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

Discussion/Explanation:

**Less-than-Significant Impact:** The water supplier for the community of Jacumba Hot Springs is the JCSD. However, the project site is located immediately adjacent to, but outside of, JCSD's service area (San Diego County LAFCO 2023). It should be noted that the County plans to pursue annexation into the JCSD service area to provide water service to the project site. Potential plans for annexation are still in process at the time of

this IS/MND. However, in the event that annexation into the JCSD service area is not approved by JCSD and other relevant agencies, the project would rely on groundwater. Therefore, this analysis conservatively assumes that the proposed project would need to obtain its water supply from groundwater.

The closest source of groundwater is the Jacumba Valley alluvial aquifer, which the California Department of Water Resources (DWR) has designated as the Jacumba Valley Groundwater Basin (7-047). The Sustainable Groundwater Management Act (SGMA) that was signed into law by Governor Brown in September 2014 requires sustainable management of all groundwater basins designated as medium- or high priority by DWR. California's 515 groundwater basins are classified into one of four categories: high-, medium-, low-, or very low-priority. These categories are based on components identified in the California Water Code Section 10933(b), including documented impacts on the groundwater within the basin. DWR assigned a very low-priority ranking to the Jacumba Valley Groundwater Basin. Very low-priority basins are currently not required to prepare a Groundwater Sustainability Plan under SGMA.

Additionally, recent groundwater in storage within the Jacumba Valley alluvial aquifer is estimated to be 9,005 acre-feet. The estimated future maximum extraction by all known sources from the Jacumba Valley alluvial aquifer is 584.5 acre-feet, or a 6.5 percent reduction in estimated groundwater in storage (JCSD 2019). The proposed project is anticipated to require approximately 0.5-acre feet of water per year. This amount can be accommodated by the existing groundwater supply.

As such, project water supply via a new groundwater well would not cause a conflict with the SGMA. Impacts on groundwater supply would be less than significant, and no mitigation is required.

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

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

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

Discussion/Explanation:

**Less-than-Significant Impact:** Projects within the County are required to design storm drainage system to meet the standards in the County's Hydraulic Design Manual and employ BMPs from the County's BMP Design Manual to avoid significant hydrology-related impacts. Additionally, project-specific plans are required to be prepared in accordance with the WPO and the BMP Design Manual to avoid or minimize water quality impacts. The County's BMP Design Manual establishes standards for new development

to minimize runoff and maximize infiltration and contains mandatory measures that development projects must employ to address pollutant control and hydromodification management, and therefore reduce the level of significance of effects related to on- or off-site erosion and siltation. The County also maintains the Grading Ordinance. Projects within the County are subject to the provisions of the Grading Ordinance to protect development sites against erosion and instability. Projects proposed within the County must demonstrate compliance with the Grading Ordinance on development plans.

The project proposes the construction and operation of a new fire station on a 2.77-acre portion of a currently undeveloped, vacant 5-acre property in the unincorporated community of Jacumba. Construction of the proposed project would involve the use of heavy equipment, grading, paving, and other typical construction activities that could modify existing drainage patterns if not properly addressed and result in substantial erosion on or offsite. Pollutants associated with construction activities typically include soils, debris, fuels and other fluids associated with the equipment used for construction, paints, concrete slurries, and asphalt materials. The project would also construct LID stormwater drainage features. Specifically, the project proposes to include a 20-foot by 165-foot stormwater bioswale/infiltration basin to provide stormwater pollution, prevention, and flow control of stormwater generated onsite. This LID feature would ensure proper drainage onsite that would avoid significant erosion or siltation during the project-operational phase.

Overall, the project will implement site design measures, source control, and/or treatment control BMPs, consistent with the County's BMP Design Manual and the WPO to ensure significant erosion and/or siltation do not occur. These measures will satisfy waste discharge requirements as required by the MS4 permit (SDRWQCB Order No. R9-2013-0001, as amended by Order Nos. R9-2015-0001 and R9-2015-0100), as implemented by the San Diego County JURMP and Standard SUSMP. Therefore, impacts related to the potential to substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site would be less than significant, and no mitigation is required.

**ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?**

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

Discussion/Explanation:

**Less-than-Significant Impact:** The proposed project would not significantly alter established drainage patterns or significantly increase the amount of runoff. Drainage will be conveyed to the proposed 20-foot by 165-foot stormwater bioswale/infiltration basin to provide stormwater pollution, prevention, and flow control of stormwater generated onsite. This LID feature would ensure proper drainage onsite and avoid causing any flooding on or offsite.

Therefore, the project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site. Impacts would be less than significant, and no mitigation is required.

**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?**

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

Discussion/Explanation:

**Less-than-Significant Impact:** The project is located in a rural area on a site that does not currently support a developed storm drainage system. The project does not propose to create or contribute runoff water that would exceed the capacity of the planned storm water drainage system. While the proposed project would increase the amount of impervious surface area compared to existing conditions, it would also include development of a LID stormwater drainage feature. Specifically, the project proposes to include a 20-foot by 165-foot stormwater bioswale/infiltration basin to provide stormwater pollution, prevention, and flow control of stormwater generated onsite. This LID feature would ensure proper drainage onsite and is sized adequately to capture all onsite runoff. Impacts would be less than significant, and no mitigation is required.

**iv) Impede or redirect flood flows?**

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

Discussion/Explanation:

**Less-than-Significant Impact:** The project site is not near any waterways, including lakes, rivers, streams, or creeks. According to the Federal Emergency Management Agency (FEMA) flood maps, the project site is not located within a mapped FEMA floodway or flood plain. However, the project site is within FEMA Zone D, which indicates that flood risk is undetermined because the agency has not conducted a flood hazard analysis (FEMA 2012). Based on the flood mapping completed for the adjacent JVR Energy Park project, the project site is within an area that was identified as being subject to inundation by the calculated 100-year flood (above 6-inch depth). As such, although the project site is not within a FEMA mapped floodway or floodplain, it is in an area that is subject to flooding and the project could therefore impede or redirect flood flows.

To address the potential for flooding on the project site, the proposed project includes project design features PDF-HYD-1 and PDF-HYD-2. Under PDF-HYD-1, the proposed project would be designed in accordance with the County of San Diego Flood Damage Prevention Ordinance, County Hydrology Manual, and County Hydraulic Design Manual, which includes raising the finished floor elevation 1 foot above base flood elevation. Under PDF-HYD-2, flood fencing would either be breakaway or flow through fencing. The full descriptions of these project design features are provided in the "Project Description," under the subheading "Design Features," above. Therefore, with the incorporation of project design features PDF-HYD-1 and PDF-HYD-2, the proposed project would not impede or redirect flood flows. This impact would be less than significant.

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

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

**Discussion/Explanation:**

**Less-than-Significant Impact:** The project site is not located in the vicinity of a water body large enough to present a risk of inundation by seiche or tsunami. The project vicinity is generally flat and does not include slopes that would be subject to mudflow under rain event or seismic shaking conditions. However, as discussed under item X(c)(iv), the project site is within an area that was identified as being subject to inundation by the calculated 100-year flood (above 6-inch depth), based on the flood mapping completed as part of the JVR Energy Park project. To address the potential for flooding on the project site, the proposed project includes project design features PDF-HYD-1 and PDF-HYD-2. Under PDF-HYD-1, the proposed project would be designed in accordance with the County of San Diego Flood Damage Prevention Ordinance, County Hydrology Manual, and County Hydraulic Design Manual, which includes raising the finished floor elevation 1 foot above base flood elevation. Under PDF-HYD-2, flood fencing would either be breakaway or flow through fencing. Therefore, with the incorporation of project design features PDF-HYD-1 and PDF-HYD-2, the proposed project would not risk the release of pollutants due to project inundation. This impact would be less than significant.



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

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

Discussion/Explanation:

**Less-than-Significant Impact:** Please see the analysis provided in items X(a) and X(b). As analyzed in item X(a), the proposed project would be in conformance with the County's WPO and would implement BMPs identified in the County's BMP Design Manual, both of which ensure consistency with the Regional MS4 permit. The project would include a 20-foot by 165-foot stormwater bioswale/infiltration basin to provide stormwater pollution, prevention, and flow control of stormwater generated onsite. This LID feature would ensure proper drainage onsite and avoid causing any flooding on or offsite. Therefore, the proposed project would not conflict with or obstruct implementation of a water quality control plan.

As analyzed in item X(b), the proposed project would obtain water from a new groundwater well. The closest groundwater basin is the Jacumba Valley Groundwater Basin, which is classified as a very-low priority basin by DWR. Very-low priority basins are not required to prepare GSPs. Therefore, water obtained from a groundwater well on the project site would not conflict with an existing applicable GSP or SGMA. Impacts would be less than significant, and no mitigation is required.

**XI. LAND USE AND PLANNING** – Would the project:

**a) Physically divide an established community?**

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

Discussion/Explanation:

**No Impact:** The project involves the construction and operation of a new fire station on a 2.77-acre portion of a currently undeveloped, vacant 5-acre property in the unincorporated community of Jacumba. The project is located on the north side of Old Highway 80, approximately 0.4-mile north of the US-Mexico International Border. The project site has a General Plan land use designation of Specific Plan Area and is zoned S88 – Specific Planning Area, which allows for Fire Protection Services per Section 2802 of the County's Zoning Ordinance. Although Fire Protection Services is an allowable use, the Zoning Ordinance does not apply to the project pursuant to Section 1006(b) because it involves the development of a County owned and operated facility and provides a public purpose. Surrounding land uses include the community of Jacumba to the west, vacant land to the north and east, and Old Highway 80 and vacant land to the south. The project would not

require any changes to the General Plan land use designation or zoning of the project site or adjoining properties. Additionally, the project would not displace any existing housing in the project area because there are no existing residences surrounding the project site. Therefore, the proposed project would not physically divide an established community. No impact would occur.

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

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

Discussion/Explanation:

**Less-than-Significant Impact:** The project site has a General Plan land use designation of Specific Plan Area and is zoned S88 – Specific Planning Area. The project is exempt from the County’s Zoning Ordinance, including the S88 zoning requirements. The project would not require any changes to the General Plan land use designation or zoning of the project site or adjoining properties. Additionally, the project site is outside of the airport safety zones boundaries identified in Figure 2-1 of the Jacumba Airport ALUCP (SDCRAA 2022). Furthermore, the project is in compliance with the ALUCP and does not propose any distracting visual hazards such as distracting lights, sources of smoke or other obstacles or an electronic hazard that would interfere with aircraft instruments or radio communications. Therefore, the proposed project is anticipated to be in conformance with the Federal Aviation Administration Regulations, Part 77 – Objects Affecting Navigable Airspace and the County will comply with any FAA consultation requirements.

The Zoning Ordinance does not apply to this project pursuant to Section 1006(b) of the Zoning Ordinance as it involves the development of a County owned and operated facility and provides a public purpose. Therefore, the project would not cause a significant environmental impact due to a conflict with any land use plans, policies, or regulations. Impacts would be less than significant, and no mitigation is required.

**XII. MINERAL RESOURCES** – Would the project:

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

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

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

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

**Discussion/Explanation:**

**No Impact:** The Surface Mining and Reclamation Act of 1975 required the State Geologist to initiate mineral land classification to help identify and protect mineral resources in areas within the state. The lands within Jacumba, including the project site, are outside of the Western Production-Consumption region boundary for San Diego County, and therefore have not been classified by the California Department of Conservation – Division of Mines and Geology (Department of Conservation 1997). The project site is not currently being utilized for any type of mineral extraction and does not contain any known mineral resources that would be of value to the region or the state. Additionally, the project site and surrounding area have not been delineated as a locally important mineral resource recovery site in a local general plan, specific plan, or other land use plan. Therefore, the project would not result in the significant loss of availability of a known mineral resource of value to the region or state or a locally important mineral resource recovery (extraction) site delineated on a local general plan, specific plan, or other land use plan. No impact would occur.

**XIII. NOISE** – Would the project result in:

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

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

**Less-than-Significant Impact.** The proposed project would replace the existing Jacumba fire station with a new fire station located in the unincorporated community of Jacumba. This discussion includes an analysis of short-term construction noise and long-term operational noise.

**Construction Noise (Temporary)**

To assess potential short-term (construction-related) noise impacts, sensitive receptors and their relative exposure were identified. Project-generated construction source noise levels were determined based on methodologies, reference emission levels, and usage factors from the Federal Transit Administration's (FTA) Guide on Transit Noise and Vibration Impact Assessment methodology (FTA 2018) and Federal Highway

Administration's (FHWA) Roadway Construction Noise Model User's Guide (FHWA 2006). Reference noise levels for specific equipment and activity types are well documented, and the usage thereof is common practice in the field of acoustics.

Construction is typically a temporary activity and noise from construction ceases once construction is complete. Construction noise levels vary from hour to hour and day to day, depending on the equipment in use, the operations being performed, and the distance between the noise source and receiver. Construction of the proposed project is anticipated to begin in January 2026 and is expected to be completed in approximately 12 to 14 months.

As detailed in Chapter 2, "Project Description," construction of the proposed project would involve excavation for building foundations, utilities, and the proposed bioswale and leech field and construction of an approximately 8,500 square-foot building as well as ingress/egress driveways and onsite parking. The proposed project would be constructed on undeveloped land; thus, no demolition would be required. Construction activities would occur between the hours of 7:00 a.m. and 7:00 p.m. and would not take place on Sundays or holidays to comply with the County's Code of Regulatory Ordinances (Section 36.408 and 36.409).

Typical equipment that would be used during construction would include heavy-duty trucks, backhoes, front-end loaders, excavators, and paving equipment. Construction equipment with substantially higher noise-generation characteristics, such as pile drivers, rock drills, and blasting equipment, would not be used for construction of any phase of the proposed project. Construction-generated noise levels would fluctuate depending on the type, number, and duration of equipment used. The effects of construction noise largely depend on the type of construction activities occurring on any given day, noise levels generated by those activities, distances to noise sensitive receptors, and the ambient noise environment at nearby receptors.

The typical maximum noise levels (i.e.,  $L_{max}$ ) for various pieces of construction equipment at a distance of 50 feet are presented in Table 8. However, construction equipment operates in alternating cycles of full power and low power, producing average noise levels less than the maximum noise level. The average sound level of construction activity also depends on the amount of time that the equipment operates and the intensity of construction activities during that time.

**Table 8 Typical Noise Levels from Construction Equipment**

<b>Equipment Type</b>	<b>Typical Noise Level (<math>L_{max}</math> dBA) @ 50 feet</b>
Backhoe	80
Concrete Mixer	85
Compactor	80
Crane/Lift	85
Compressor (Air)	80

Equipment Type	Typical Noise Level ( $L_{\max}$ dBA) @ 50 feet
Dozer	85
Dump Truck	84
Excavator	85
Flat Bed Truck	84
Front End Loader	80
Generator	70
Grader	85
Paver	85
Roller	85
Pickup Trucks	54

Notes: Assumes all equipment is fitted with a properly maintained and operational noise control device, per manufacturer specifications. Noise levels listed are manufacture-specified noise levels for each piece of heavy construction equipment.

Source: FTA 2018: 176.

As shown in Table 8, the maximum noise levels at 50 feet for typical construction equipment could result in levels up to 85 dBA. Sound from a localized source (i.e., a point source) propagates uniformly outward in a spherical pattern. The sound level attenuates (or decreases) at a rate of 6 dBA for each doubling of distance from a point source. The closest noise-sensitive receptors are residential uses located approximately 255 feet west of the proposed project boundary.

Modeling for on-site construction noise conservatively assumed simultaneous operation of four pieces of heavy equipment (a backhoe, excavator, front end loader, and paver) within close proximity and at the edge of the proposed project site. These four pieces of equipment would generate a combined noise level of 81.2 dBA  $L_{eq}$  and 85 dBA  $L_{\max}$  at 50 feet. Modeling was also conducted to convert the construction noise level of 81.2 dBA  $L_{eq}$  to a Community Noise Equivalent Level (CNEL) which is the energy average of the A-weighted sound levels occurring over a 24-hour period, with a 10-dBA penalty applied to sound levels occurring during the nighttime hours between 10:00 p.m. and 7:00 a.m. and a 5-dBA penalty applied to the sound levels occurring during evening hours between 7:00 p.m. and 10:00 p.m. This conversion from  $L_{eq}$  to CNEL resulted in an exterior noise level of 79.2 CNEL. See Appendix E for detailed calculations.

The attenuated noise level at the nearest noise-sensitive receptor approximately 255 feet from the western project boundary would be 67.1 dBA  $L_{eq}$  and 65 dBA CNEL. Thus, noise generated by construction activities is not expected to exceed the County's sound level limitations on construction equipment of 75 dBA for an eight-hour period between the hours of 7:00 a.m. and 7:00 p.m. (San Diego County Code of Regulatory Ordinances Section 36.409). Calculations of these combined noise levels are provided in Appendix E.

For these reasons, construction noise would not be expected to result in adverse effects to nearby sensitive receptors. Therefore, the noise impact related to construction of the proposed project would be less than significant.

Operational Noise (Permanent) Stationary Noise

Development of the project would result in the installation of stationary noise sources used during building operation such as heating, ventilation, and air conditioning (HVAC) equipment. Based on project site plans, HVAC equipment would be located in a fully enclosed area within the fire station footprint, and the emergency backup generator would be located on an exterior ground set concrete pad with an overhead enclosure. Noise levels from HVAC equipment vary substantially depending on unit efficiency, size, and location. Noise levels from HVAC equipment range from 45 to 70 dBA  $L_{eq}$  at 50 feet (EPA 1971). Using the highest noise level in the range for HVAC equipment and assuming the equipment would be installed on the side of the building nearest to the surrounding noise sensitive receptor, the noise level at the sensitive receptor location would be 55.8 dBA  $L_{eq}$  (or 62.5 CNEL). See Appendix E for detailed calculations. Applying an additional 24 dBA noise reduction associated with the average exterior-to-interior noise level reduction typically provided by residential buildings with the windows closed (EPA 1978), the HVAC system would result in an interior noise level of 31.8 dBA  $L_{eq}$  (or 38.5 CNEL) at the sensitive receptor, which is below the County's interior threshold of 45 dBA between the hours of 10:00 p.m. and 7:00 a.m. Additionally, the noise level would likely be even lower because the HVAC equipment would be enclosed.

Therefore, HVAC noise levels would not exceed the County's 60 dBA CNEL threshold for residential uses at the nearest sensitive receptor nor would it exceed the most stringent sound level limits (i.e., 50 dBA between the hours of 7:00 a.m. and 10:00 p.m. and 45 dBA between 10:00 p.m. and 7:00 a.m.) provided in Table 36.404 in the County's Code of Regulatory Ordinances (Section 36.404).

An emergency power source for the facility would be provided by an emergency generator. Generators may reach a maximum noise level of 82 dBA at 50 feet (FHWA 2006). Additionally, the emergency generator would only operate in the event of a loss of power; thus, this type of noise would occur very infrequently. Section 36.417 of the County of San Diego Code of Regulatory Ordinances provides an exemption for "the operation of an emergency generator after a power failure, by an employee or agent of a law enforcement agency, fire department, hospital or other medical or surgical facility that is providing emergency medical services." Therefore, emergency generator noise is exempt from the noise standards provided in Chapter 4 of the County of San Diego Code of Regulatory Ordinances.

For these reasons, new stationary noise sources associated with the proposed project would not result in adverse effects to nearby sensitive receptors and the impact would be less than significant.

### Traffic Noise

As detailed in Chapter 2, "Project Description," the proposed project would replace the existing Jacumba Fire Station, which is located approximately 0.6-mile away from the project site. Therefore, trips already generated by existing fire station personnel would be redistributed to roadways accessing the new location of the proposed project. Additionally, it is expected that only two firefighters and one paramedic would be on-duty at a time, consistent with existing fire station operations. Therefore, traffic generated by the proposed project would be minimal (i.e., 3 daily work-commute trips) plus emergency response trips, as needed.

It is widely accepted that people can begin to detect sound level increases of 3 dBA in typical noisy environments. Further, a 5 dBA increase is generally perceived as a distinctly noticeable increase, and a 10 dBA increase is generally perceived as a doubling of loudness (Caltrans 2013: 2-10). Therefore, a doubling of sound energy (e.g., doubling the volume of traffic on a highway) that would result in a 3 dBA increase in sound would generally be perceived as barely detectable. Because the project would replace an existing fire station and would not result in increases in employees, project-generated daily trip volumes would not increase over existing conditions or result in a noticeable increase in noise. Thus, it is anticipated that traffic noise would not adversely affect any nearby sensitive receptors due to the implementation of the proposed project and the impact would be less than significant.

### Fire Truck Noise

Noise associated with the use of emergency vehicle sirens is often a concern as it relates to the quality of life of nearby residents. The concern is related to the perception that fire stations would typically respond to many emergencies leaving the site daily and that emergency sirens are intentionally loud and that such loud noise could disrupt the surrounding community.

Although fire trucks could generate noise levels that are disruptive, noise events from fire trucks would be infrequent and individual events would be short in duration, fire truck noise would not result in long-term effects to any single sensitive receptor that could result in substantial increases in noise leading to adverse health effects. Additionally, as detailed in Chapter 2, "Project Description," the service area would remain unchanged from the existing Jacumba Fire Station 43. The relocation of the existing Jacumba Fire Station 43 would not result in overall increases in community noise because the frequency of calls would not be affected by the project as compared to existing conditions. Similar to existing conditions, it is anticipated that the new fire station would respond to an average of 1.2 calls per day (Toledo, pers. comm. 2024)

A typical siren emits approximately 100 dBA at 100 feet (City of Goleta 2018). The residential uses located approximately 255 feet from the western edge of the proposed project site would experience peak short-duration exterior noise levels of approximately 91.9 dBA an average of 1.2 times per day as the fire truck leaves the proposed project site to respond to an emergency. See Appendix E for detailed noise modeling. Following

EPA guidance and applying an additional 24 dBA noise reduction for buildings with the windows closed, the fire truck siren would result in an interior noise level of 67.9 dBA at the nearest sensitive receptor.

The duration of exposure to peak noise levels of approximately 91.9 dBA is estimated to last for a maximum of 10 seconds as emergency vehicles pause at the driveway exit, engage the siren and turn onto Highway 80 and accelerate rapidly away from the fire station. Thus, residents of existing nearby homes would be exposed to high noise levels for approximately 10 seconds, an average of 1.2 times per day. Additionally, the typical practice for emergency vehicle use for San Diego County Fire is to use sirens to break traffic at intersections or warn drivers of the emergency vehicle approach when traffic is congested. Responses to nighttime emergency calls, when nuisance noise is most noticeable, routinely occur without the use of sirens. Further, the Medical Priority Dispatch System currently employed by first responders in the County was recently updated. Through the updated dispatch system, many low priority screened calls do not require lights or sirens, which further reduces noise during emergency response. It should be noted that other homes and residents along Highway 80 and other routes used for emergency access would also be exposed to possibly higher noise levels, although the magnitude and frequency of this exposure would vary by distance from the road and proximity to proposed fire station. The duration of such exposure would likely be less than the projected 10 seconds for homes near the proposed project as the emergency vehicles would generally be assumed to be passing at full speed, with no time required for turning out of the driveway or accelerating. Based on the brevity of the siren noise, no measurable change would occur to the existing CNEL levels. Overall, the noise associated with an increase of approximately one emergency vehicle trip per day would not be considered a significant impact because average noise levels at sensitive receptors would not change.

Therefore, the proposed project would not generate 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?**

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

**Less-than-Significant Impact.** The County of San Diego does not have vibration thresholds; however, County General Plan Policy N-3.1, "Groundborne Vibration," recommends using FTA and Federal Railroad Administration guidelines to limit the extent of exposure that sensitive uses may have from construction equipment. Therefore, the proposed project-generated construction source noise and vibration levels were determined based on methodologies, reference emission levels, and usage factors from FTA's Guide on Transit Noise and Vibration Impact Assessment methodology (FTA 2018).



Construction activities that may expose people to excessive vibration, resulting in sleep disturbance or prolonged disruption to daily activities/work, are more likely to occur during extended construction schedules that involve impact equipment (e.g., pile drivers, jackhammers), blasting, or large haul trucks. Based on FTA guidance, transient vibrations, such as construction activity with a 0.2 inches per second (in/sec) peak particle velocity (PPV) may be characterized as causing structural damage to non-engineered timber and masonry buildings, 0.3 PPV in/sec for engineered concrete masonry, and 0.5 PPV in/sec for reinforced concrete, steel, or timber structures. In addition, peak vibration levels (VdB) established by the FTA, recommend a level of 80 VdB for the purpose of evaluating disturbance to sensitive land uses where people sleep.

Based on the proposed construction activity and types of equipment that would be used, the heaviest piece of construction equipment that would generate the highest levels of vibration would be a vibratory roller. A vibratory roller operated within approximately 26 feet of an existing building or structure could expose that structure to levels of ground vibration that exceed FTA recommended level of 0.2 in/sec PPV with respect to the prevention of structural damage. Also, a vibratory roller operated within 73 feet of a building could expose the building occupants to ground vibration levels that exceed the FTA maximum-acceptable vibration standard of 80 VdB with respect to human annoyance for residential uses. Because all construction activity would take place more than 73 feet from sensitive receptors (i.e., the nearest receptor is approximately 255 feet from the western project boundary), there would be no exceedance of FTA's recommended level of 0.2 in/sec PPV with respect to the prevention of structural damage or FTA's standard of 80 VdB with respect to human annoyance for residential uses. Refer to Appendix E for detailed vibration modeling calculations. Therefore, the project's exposure of persons to excessive levels of groundborne vibration during construction would be less than significant.

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

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

**Less-than-Significant Impact.** The proposed project would be located approximately 0.5-mile west of Jacumba Airport. The proposed project would not increase existing airport noise or result in changes to existing airport operations. Thus, the proposed project would not expose people residing or working in the project area to excessive airport-related noise. Therefore, the project would not expose people working in the project area to excessive levels of airport noise. Impacts would be less than significant, and no mitigation is required.

**XIV. POPULATION AND HOUSING** – Would the project:

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

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

Discussion/Explanation:

**Less-than-Significant Impact:** The proposed project site is located on a 2.77-acre portion of a currently undeveloped, vacant 5-acre property in the unincorporated community of Jacumba. The project does not propose the construction of new homes, businesses, or infrastructure, nor would it require the extension of water or sewer lines that could induce population growth. Although the proposed project involves the construction of a new fire station, it would replace the existing Jacumba Fire Station No. 43 that currently serves the Jacumba community and surrounding area. As such, the proposed project would not induce substantial population growth either directly or indirectly, nor would it remove any preexisting barriers to growth.

Additionally, although project construction would generate temporary construction jobs, given the scale of construction, these jobs would likely be filled by construction workers who currently live in the region. As such, the temporary construction jobs generated by the project would not result in the substantial relocation of any population into the region that could increase demand for housing, goods, or other services. Therefore, the proposed project would not directly or indirectly induce substantial population growth through the creation of new homes or businesses or through the extension of any roads or other infrastructure. Impacts would be less than significant, and no mitigation is required.

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

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

Discussion/Explanation:

**No Impact:** The proposed project is located on a 2.77-acre portion of a currently undeveloped, vacant 5-acre property in the unincorporated community of Jacumba. As such, there are no existing housing units on the site that would be displaced by the project. Additionally, the proposed new fire station would include up to 12 bunks (six double-bunk dorm rooms) for firefighters and paramedics that are on duty for each shift. As a result, the proposed project would not increase the demand for housing in Jacumba or surrounding communities that could displace existing residents. Therefore, no impact would occur.

## **XV. PUBLIC SERVICES**

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

i. **Fire protection?**

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

Discussion/Explanation:

**Less Than Significant with Mitigation Incorporated:** The proposed project involves the construction and operation of a new fire station on a 2.77-acre portion of a currently undeveloped, vacant 5-acre property which would replace the existing fire station currently serving the community and surrounding area. Once project construction is complete, the existing fire station would cease to operate.

Potential impacts associated with construction of the new fire station have been analyzed throughout this IS/MND. As detailed in Sections I through XX of this IS/MND, construction of the proposed project would have the potential to result in significant impacts on biological resources, cultural resources, and tribal cultural resources. However, as discussed in those sections, the implementation of mitigation measures **MM-BIO-1** through **MM-BIO-4** and **MM-CUL-1** would reduce impacts on biological resources, cultural resources, and tribal cultural resources to less than significant. Please refer to Sections IV, V, and XVIII for more information.

ii. **Police protection?**

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

Discussion/Explanation:

**No Impact:** The addition of a new fire station to the existing Jacumba community would not increase the demand for police protection services such that new or expanded police facilities would be required. The proposed fire station would replace the existing fire station that currently serves Jacumba and the surrounding area. As such, the new fire station would not be considered new infrastructure that could induce population growth and increase the demand for police protection services. Therefore, the proposed project

would not have an adverse physical effect on the environment from the construction of new or significantly altered police protection services or facilities. No impact would occur.

**iii. Schools?**

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

Discussion/Explanation:

**No Impact:** The addition of a new fire station to the existing Jacumba community would not increase the demand on schools such that new or expanded school facilities would be required. The proposed fire station would replace the existing fire station that currently serves Jacumba and the surrounding area. As such, the new fire station would not be considered new infrastructure that could induce population growth and increase the demand for school services. Therefore, the proposed project would not have an adverse physical effect on the environment from the construction of new or significantly altered school services or facilities. No impact would occur.

**iv. Parks?**

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

Discussion/Explanation:

**No Impact:** The addition of a new fire station to the existing Jacumba community would not increase the demand on park facilities such that new or expanded parks would be required. The proposed fire station would replace the existing fire station that currently serves Jacumba and the surrounding area. As such, the new fire station would not be considered new infrastructure that could induce population growth and increase the demand on parks. Therefore, the proposed project would not have an adverse physical effect on the environment from the construction of new or significantly altered parks. No impact would occur.

**v. Other public facilities?**

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

Discussion/Explanation:

**No Impact:** The proposed project includes the construction of a new fire station to replace the existing fire station currently serving Jacumba and the surrounding area. The land where the proposed new fire station would be located has been donated to the County

as part of the conditions of approval for PDS2012-MUP-18-022, as a portion of the community benefit requirement of the JVR Energy Project. The project would not include the construction of any new housing or other uses that would result in increased demand for public facilities. Therefore, the proposed project would not have an adverse physical effect on the environment from the construction of new or significantly altered public services or facilities. No impact would occur.

**XVI. RECREATION** – Would the project:

- a) **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) **Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?**

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

Discussion/Explanation:

**No Impact:** The proposed project involves the construction and operation of a new fire station on a 2.77-acre portion of a currently undeveloped, vacant 5-acre property in the unincorporated community of Jacumba. The project site is not a park and does not contain any recreational facilities, and there are no planned or proposed Community Plan trails on or along the project site. As such, the project would not result in the loss of existing recreational facilities necessitating the construction of replacement recreational facilities elsewhere. Additionally, the project does not propose any residential use, included but not limited to a residential subdivision, mobile home park, or construction of single-family residences that may increase the use of existing neighborhood and regional parks or other recreational facilities in the vicinity. Therefore, the project does not include recreational facilities or require the construction or expansion of recreational facilities that could have an adverse physical effect on the environment. No impact would occur.

**XVII. TRANSPORTATION** – Would the project:

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

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

Discussion/Explanation:

**Less-than-Significant Impact:** Potential impacts related to the circulation system are detailed below.

Roadway Network

Implementation of the proposed project would not require the construction, redesign, or alteration of any public roadways other than the construction of ingress/egress access driveways along Old Highway 80 that would allow access to the proposed project site.

Bicycle and Pedestrian Facilities

The bicycle and transportation system in San Diego County is composed of regional and local bikeways, pathways, and trails. San Diego County has over 158 miles of existing bikeways, and as of 2018, San Diego County had 1 mile of Class I bicycle paths, 145 miles of bicycle lanes, and 9 miles of bicycle routes (County of San Diego 2018). There are Class II bicycle lanes present along Old Highway 80 in the vicinity of the proposed project site; however, there are no pedestrian facilities present. The nearest pedestrian facilities are located approximately 0.25 mile west of the proposed project site on Old Highway 80. As detailed above, the proposed project would not change the existing surrounding roadway network. Additionally, there are no planned bicycle or pedestrian facilities in the vicinity of the project site. Therefore, the proposed project would not conflict with existing or planned bicycle or pedestrian facilities.

Transit System

The San Diego Metropolitan Transit System (MTS) operates bus, light rail, and paratransit services throughout San Diego County. The nearest bus stop, which serves the 888 bus route, is located approximately 0.12 miles from the proposed project site at the Campo Street and Old Highway 80 intersection. MTS bus route 888 operates between Parkway Plaza and Jacumba Hot Springs on Mondays and Fridays only. Eastbound buses operate between 9:40 a.m. and 11:30 a.m., and westbound buses operate between approximately 4:10 p.m. and 6:00 p.m. Eastbound and westbound buses have approximately 15-minute headways for the majority of the span of service. The proposed project would not alter or conflict with any existing transit facilities, and there are no planned or programmed transit facilities in the vicinity of the project site. Therefore, the proposed project would not adversely affect or conflict with any existing or planned transit facilities or service.

In summary, the proposed project would not conflict with a program, plan, ordinance, or policy addressing the circulation system. This impact would be less than significant.

**b) Conflict or be inconsistent with CEQA Guidelines section 15064.3(b), which pertains to vehicle miles travelled?**

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

Discussion/Explanation:

**Less-than-Significant Impact:** Applicable regulatory information and impacts related to vehicle miles traveled (VMT) generated from construction and operation of the project are discussed below.

State CEQA Guidelines Section 15064.3 was added on December 28, 2018, to address the determination of significance for transportation impacts, which requires VMT as the basis of transportation analysis instead of congestion (such as LOS). Section 15064.3(b)(3), "Qualitative Analysis," explains that there may be conditions under which a qualitative rather than quantitative analysis of VMT is appropriate. This section states that if existing models or methods are not available to estimate the VMT for the particular project being considered, a lead agency may qualitatively analyze VMT generated by a project. This section notes that for many projects, a qualitative analysis of construction traffic may be appropriate. Additionally, Section 15064.3(b)(4), "Methodology," explains that the lead agency has discretion to choose the most appropriate methodology to evaluate VMT subject to other applicable standards such as CEQA Guidelines Section 15151 (standards of adequacy for EIR analyses).

In December of 2018, OPR published the most recent version of the Technical Advisory on Evaluating Transportation Impacts in CEQA (Technical Advisory), which provides guidance for VMT analysis. The OPR Technical Advisory provides guidance related to screening thresholds for small projects to indicate when detailed analysis is needed or if a project can be presumed to result in a less-than-significant VMT impact. The OPR Technical Advisory notes that projects that generate or attract fewer than 110 trips per day generally may be assumed to cause a less-than-significant transportation impact, absent substantial evidence indicating otherwise (OPR 2018).

In September of 2022, the County of San Diego adopted the Transportation Study Guide (TSG) that establishes VMT guidelines and thresholds to meet the State requirements set by Senate Bill (SB) 743 and that address CEQA Guidelines Section 15064.3. The County TSG establishes screening criteria for CEQA VMT Analysis. Following guidance provided by OPR, the County TSG states that public facilities that service the community, such as law enforcement and fire facilities, may be presumed to have a less-than-significant impact absent substantial evidence to the contrary. The VMT analysis herein relies on the guidance provided in OPR's Technical Advisory and the County's TSG.

Construction

As detailed in "Project Description," the proposed project involves the construction and operation of a new 8,500 square foot fire station and associated facilities on a 2.77-acre portion of a currently undeveloped, vacant 5-acre property. Project construction would require a maximum of 18 construction workers per day. Project construction activities would be temporary and intermittent in nature occurring in phases between January of 2026 and April of 2027, and thus would not result in long-term increases in vehicular trips. Construction workers for the proposed project are expected to generate a total of 36

average daily trips, assuming that they would not carpool and would generate two trips per worker per day. Therefore, the number of daily construction trips generated would be fewer than 110 trips per day, thus satisfying the screening threshold for small projects as detailed in the OPR Technical Advisory. Therefore, construction activities for the proposed project are not expected to significantly increase VMT in the region.

#### Operations

As discussed in “Project Description,” the proposed project would replace the existing fire station with a new fire station. As detailed in Section 3.3.1, “Screening Criteria for CEQA VMT Analysis” of the County’s TSG, locally serving public facilities and other uses including law enforcement and fire facilities would be presumed to have a less-than-significant VMT impact and can be screened from further analysis.

Additionally, as detailed in “Project Description,” the new fire station would serve the same service area as the existing fire station and would continue to provide mutual aid assistance to adjacent Imperial County in the event of an emergency. Similar to the existing Jacumba Fire Station 43, each shift would include a minimum of three firefighters, one of which would be a paramedic. Therefore, there would be no substantial increase in the number of employees at the new fire station or the intensity of operations as compared to existing conditions. Consequently, the proposed project would only redistribute trips from the existing fire station to the proposed project’s new location and would not generate new trips. Based on OPR Technical Advisory screening criteria for small projects, the proposed project would not generate 110 trips or more per day. Therefore, operation of the proposed project would not result in a substantial increase in VMT.

In summary, construction and operation of the proposed project would not conflict or be inconsistent with CEQA Guidelines section 15064.3(b). This impact would be less than significant.

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

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

Discussion/Explanation:

**Less-than-Significant Impact:** The proposed project’s impacts related to transportation hazards during construction and operation are detailed below.

#### Construction

As detailed in “Project Description,” construction activities would involve site preparation, minor grading, and excavation for building foundations and utilities. Construction vehicles and equipment would access the project site via Old Highway 80 and all construction equipment and vehicle staging would occur within the limits of the project site.



In accordance with existing County requirements, the proposed project would be required to obtain a traffic control permit and implement a traffic control plan (TCP) for construction occurring in County right-of-way, such as the construction of new access points from Old Highway 80 to the proposed project site (County of San Diego n.d.). The TCP would be required to demonstrate appropriate traffic handling during construction activities that could impact the traveling public (e.g., the transport of equipment and materials to the project area); thus, any increased hazards related to traffic and transportation during construction would be minimized. Additionally, the proposed project would be subject to review by County staff to ensure safety standards are met during construction activities. Therefore, the impact related to transportation hazards during construction would be less than significant.

#### Operations

As discussed in "Project Description," the proposed project would involve the construction of a full-service purpose-built fire station that meets the design standards for County facilities and properties outlined in Board of Supervisors Policy G-15. The proposed project would not significantly alter roadway geometry on Old Highway 80; however, to facilitate access to the site, the proposed project would include the construction of ingress/egress access driveways with an approximately 55-foot front setback and 60-foot-wide apron in front of the apparatus bays.

All road improvements would be constructed according to the County of San Diego Public and Private Road Standards and the County Board of Supervisors Policy G-15 Design Standards for County Facilities and Property. Additionally, the proposed project would be subject to review by County staff, which would ensure the project design would comply with all applicable industry roadway design standards. Therefore, the proposed project would not substantially increase hazards due to a design feature or incompatible uses, and the impact would be less than significant.

#### **d) Result in inadequate emergency access?**

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

#### Discussion/Explanation:

**Less-than-Significant Impact:** As discussed in "Project Description," the existing fire station does not meet multiple facility criteria including department operational requirements and essential facility criteria. The proposed project would replace the existing fire station with a full-service fire station, thus enhancing the ability to provide emergency services in the area. Emergency services provided by the existing fire station would continue to operate until the proposed project is complete and operational. Therefore, dispatches of emergency services would not experience any delay compared to existing conditions during construction.

Onsite circulation would be designed to meet San Diego County Consolidated Fire Code standards and regulations pertaining to the design of roadways and emergency access. Additionally, the proposed project would be subject to review by the San Diego County Fire Protection District ensuring that the proposed project would maintain emergency access during construction and operations. Therefore, the proposed project would not result in inadequate emergency access and the impact would be less than significant.

**XVIII. TRIBAL CULTURAL RESOURCES** – Would the project:

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

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

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

**Discussion/Explanation:**

**Less than Significant with Mitigation Incorporated:** As discussed under item V(a), ASM conducted a cultural resource record search at the SCIC of the California Historical Resources Information System for the proposed project to determine if tribal cultural resources are present within the project site. Additionally, an SLF search was requested from the NAHC for information on any recorded Native American cultural sites located within the vicinity of the project site. The SLF search results were negative, and no sacred lands were identified by the NAHC. The results of the SLF and NAHC request are included in the Archaeological Survey Report prepared by ASM for the project, which is provided as Appendix B of this IS/MND.

The records search identified one previously recorded archaeological site (CA-SDI-8072) within the project site, which was surveyed by ASM on March 13, 2024. No artifacts were identified during the course of the survey. Further research revealed that CA-SDI-8072 was tested for significance under CEQA and County RPO and for eligibility to CRHR by Dudek in 2018-2019 for the JVR Energy Park Project. This study completed a full surface collection and subsurface testing on CA-SDI-8072, including within the current project area. This study excavated five shovel test pits, one Surface Scrap Unit, six auger units and a surface collection of artifacts across CA-SDI-8072. Dudek found that the site had a low potential for significant buried deposits or culturally sensitive materials and recommended that CA-SDI-8072 was not significant under CEQA, not eligible for listing in the CRHR or Local Register, not a significant resource under County RPO, and not

considered a contributor to the significance of the JVAD. Based on the survey completed for the proposed project, ASM concurred with this evaluation.

However, given the project's location within the JVAD, the presence of CA-SDI-8072 within the project site, and poor ground surface visibility within the site, there is a potential that ground-disturbing construction activities would result in the potential destruction of possible archaeological material located in the northern half of CA-SDI-8072. This would lead to the displacement of archaeological material and the partial destruction of an important resource. Given the importance of the general area with multiple archaeological districts, and the site being located within JVAD, project construction could result in potentially significant impacts on this resource and disturb human remains potentially present on the site.

To address this potentially significant impact, mitigation measure **MM-CUL-1** is required. As described in Section IV, Cultural Resources, implementation of the mitigation measure would reduce this impact to less than significant by requiring archaeological and Native American monitoring during all ground-disturbing activities of native soils associated with the project.

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

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

Discussion/Explanation:

**Less than Significant with Mitigation Incorporated:** Pursuant to AB 52, the County initiated consultation with culturally affiliated tribes. As of ~~August~~ January 2024, government to government AB-52 consultation was still in process. AB 52 consultation letters were mailed on April 18, 2024, with a requested response date of May 24, 2024. Two tribes responded requesting consultation under AB 52, including the Campo Kumeyaay Nation ~~Band of the Diegueno Mission Indians~~ and Manzanita Band of the Kumeyaay Nation. ~~Once complete, a~~ summary of the consultation will be included in the ~~Final MND~~ Archaeological Survey Report (Appendix B of this IS/MND).

However, as discussed under XVIII(i), above, mitigation measure **MM-CUL-1** is required to avoid a potentially significant impact on a Tribal Cultural Resource (TCR). Implementation of this mitigation measure would reduce this impact to less than

significant by requiring Native American monitoring during all ground-disturbing activities of native soils associated with the project.

**XIX. UTILITIES AND SERVICE SYSTEMS** – Would the project:

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

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

Discussion/Explanation:

**Less than Significant with Mitigation Incorporated:** The project involves the construction of a new fire station on a 2.77-acre portion of a currently undeveloped, vacant 5-acre property in the unincorporated community of Jacumba. Because the project site is undeveloped, it is not currently served by existing utilities. As such, new water, wastewater, stormwater drainage, electric power, and natural gas conveyances would be required to serve the project.

The project site is in a rural part of the unincorporated county that is not currently served by municipal water or wastewater systems. Water to serve the project (potable and fire station operations) would be provided via a new onsite well and appurtenant small water treatment system and wastewater would be disposed of via septic system. Additionally, the project includes the installation of an approximately 8,100 square foot leech field for the proposed septic system. The project also includes an approximately 5,160 square foot, 550 kW PV solar array to provide electrical power to the proposed fire station. The proposed PV solar array would provide enough electricity to meet the energy demands of the new fire station. Electrical service would be provided by SDG&E via the onsite PV solar system.

Potential impacts associated with construction of these new utilities have been analyzed throughout this IS/MND. As detailed in Sections I through XX of this IS/MND, construction of the proposed project, including the proposed utilities described above, would have the potential to result in significant impacts on biological resources, cultural resources, and tribal cultural resources. However, as discussed in those sections, the implementation of mitigation measures **MM-BIO-1** through **MM-BIO-4** and **MM-CUL-1** would reduce impacts on biological resources, cultural resources, and tribal cultural resources to less than significant. Please refer to Sections IV, V, and XVIII for more information. The construction of new utilities, including recordation of associated utility easements, to serve the project would not result in any additional impacts beyond those already disclosed in this IS/MND.

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

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

Discussion/Explanation:

**Less-than-Significant Impact:** The water supplier for the community of Jacumba Hot Springs is the JCSD. However, the project site is located immediately adjacent to, but outside of, JCSD's service area (San Diego County LAFCO 2023) and no water provider currently serves the project site. It should be noted that the County plans to pursue annexation into the JCSD service area to provide water service to the project site. Potential plans for annexation are still in process at the time of this IS/MND. However, in the event that annexation into the JCSD service area is not approved by JCSD and other relevant agencies, the project would rely on groundwater. Therefore, this analysis conservatively assumes that the proposed project would need to obtain its water supply from installing a groundwater well.

The closest source of groundwater is the Jacumba Valley alluvial aquifer, which the California DWR has designated as the Jacumba Valley Groundwater Basin (7-047). The SGMA that was signed into law by Governor Brown in September 2014 requires sustainable management of all groundwater basins designated as medium- or high priority by DWR. California's 515 groundwater basins are classified into one of four categories: high-, medium-, low-, or very low-priority. These categories are based on components identified in the California Water Code Section 10933(b), including documented impacts on the groundwater within the basin. DWR assigned a very low-priority ranking to the Jacumba Valley Groundwater Basin. Very low-priority basins are currently not required to prepare a Groundwater Sustainability Plan under SGMA.

Additionally, recent groundwater in storage within the Jacumba Valley alluvial aquifer is estimated to be 9,005 acre-feet. The estimated future maximum extraction by all known sources from the Jacumba Valley alluvial aquifer is 584.5 acre-feet, or a 6.5 percent reduction in estimated groundwater in storage (JCSD 2019). The proposed project is anticipated to require approximately 0.5-acre feet of water per year. This amount can be accommodated by the existing groundwater supply.

As such, project water supply via a new groundwater well would not cause a conflict with the SGMA and the impact on groundwater supply would be less than significant.

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

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

Discussion/Explanation:

**No Impact:** The project site is in a rural part of the unincorporated county that is not currently served by municipal wastewater systems. As such, the proposed project would rely completely on an on-site wastewater system (i.e., septic system), and the project would not affect the treatment capacity of any wastewater treatment provider. Therefore, no impact would occur.

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

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

Discussion/Explanation:

**Less-than-Significant Impact:** Implementation of the project would generate solid waste. All solid waste facilities, including landfills require solid waste facility permits to operate. In San Diego County, the County Department of Environmental Health and Quality, Local Enforcement Agency issues solid waste facility permits with concurrence from the California Integrated Waste Management Board (CIWMB) under the authority of the Public Resources Code (Sections 44001-44018) and California Code of Regulations Title 27, Division 2, Subdivision 1, Chapter 4 (Section 21440et seq.). There are five permitted, active landfills in San Diego County with remaining capacity, including Otay Landfill, which is the landfill that would accept construction and operation-related waste associated with the project. This landfill is located at 1700 Maxwell Road in the City of Chula Vista.

Project construction activities, including demolition, would generate a limited amount of construction waste, and operation of the fire station would generate a minimal amount of day-to-day waste from on-duty firefighters and paramedics. All solid waste from construction and operation of the fire station would be trucked to Otay Landfill, which has adequate capacity to accept the waste generated by the project. Construction of the proposed project would not be required to comply with the County of San Diego Construction and Demolition Debris Recycling Ordinance because the ordinance only applies to projects that are 40,000 square feet or greater. However, construction of the proposed project would incorporate source reduction techniques and recycling measures to divert waste away from area landfills to aim to meet County and State requirements.

The source reduction techniques and recycling measures would minimize the amount of construction waste that would need to be disposed of at Otay Landfill. Furthermore, the proposed project has been designed in accordance with Policy G-15, which includes standards for solid waste reduction such as providing proper recycling and organics disposal containers and signage. Therefore, impacts would be less than significant, and no mitigation is required.

**d) Fail to comply with federal, state, and local management and reduction statutes and regulations related to solid waste?**

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

Discussion/Explanation:

**Less-than-Significant Impact:** The proposed project would comply with all federal, state, and local statutes and regulations related to solid waste. Construction and use of the proposed project would not generate a substantial increased amount of solid waste or require the transport of substantial amounts of solid or hazardous waste. As described under Section XIX(d) above, construction of the proposed project would incorporate source reduction techniques and recycling measures to minimize the amount of construction waste that would need to be disposed of at Otay Landfill. Impacts related to solid waste regulations would be less than significant, and no mitigation is required.

**XX. WILDFIRE:**

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?**

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

Discussion/Explanation:

**No Impact:** The proposed project is in a State Responsibility Area (SRA) classified as a high fire hazard severity zone (CAL FIRE 2024). The Operational Area Emergency Plan is a comprehensive emergency plan that defines responsibilities, establishes an emergency organization, defines lines of communications, and is designed to be part of the statewide Standardized Emergency Management System. The Operational Area Emergency Plan provides guidance for emergency planning and requires subsequent plans to be established by each jurisdiction that has responsibilities in a disaster situation. The Multi-

Jurisdictional Hazard Mitigation Plan includes an overview of the risk assessment process, identifies hazards present in the jurisdiction, hazard profiles, and vulnerability assessments. The plan also identifies goals, objectives and actions for each jurisdiction in the County of San Diego, including all cities and the County unincorporated areas.

As discussed in Section IX(f), the construction and operation of a new fire station would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. During construction of the project, the existing fire station would continue to operate and respond to emergencies until the new fire station is complete and operational. Additionally, except for two new curb cuts and driveways to access the proposed fire station, the project would not result in any changes to Old Highway 80, which is the primary ingress/egress route for Jacumba and would be used by emergency responders and the public in the event of an evacuation. The addition of two new curb cuts and driveways on Old Highway 80 would not impede emergency response or evacuation. Therefore, no impact would occur.

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

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

Discussion/Explanation:

**Less-than-Significant Impact:** Although the project is in an area classified as a high fire hazard severity zone, the proposed new fire station would not exacerbate wildfire risk. Rather, the project would provide the Jacumba community and surrounding area with a new, modern fire station that would enhance the ability of CAL FIRE to respond to wildfires. Additionally, because the project would replace the existing Jacumba fire station, it would not introduce new employees or residents to the area, and therefore would not increase exposure of people to wildland fires and related hazards. Furthermore, the project would be implemented in compliance with all applicable state and County requirements related to wildfire hazards (i.e., the California Fire Code and Consolidated Fire Code, respectively), including maintaining defensible spaces and incorporating fire-resistant building materials into the design of the fire station. As such, the project does not include any characteristics that would exacerbate wildfire risk due to slope, prevailing winds, and other factors. Therefore, this impact would be less than significant.



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

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

Discussion/Explanation:

**Less-than-Significant Impact:** The project is located on an undeveloped property in the unincorporated community of Jacumba. As such, there are no roads, utilities, or other infrastructure currently on the project site. Accordingly, the project includes the construction of new driveways, a parking lot, and the extension of power lines and other utilities to serve the new fire station. However, it is not anticipated that wildfire risk would be exacerbated given the nature of the project (i.e., a new fire station). Additionally, the new fire station would be maintained in compliance with County requirements intended to reduce the risk of wildfire damage, such as brush clearing and the use of fire-resistant building materials. Therefore, the proposed project would not exacerbate fire risk or result in temporary or ongoing impacts to the environment. Impacts would be less than significant, and no mitigation is required.

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

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

Discussion/Explanation:

**No Impact:** Although the project site is in an area classified as a high fire hazard severity zone, it is not within a landslide hazard zone. Additionally, as discussed in items XX(a) through (c), the proposed project would not exacerbate the risk of wildfire. However, as discussed under item X(c)(iv), the project site is within an area that was identified as being subject to inundation by the calculated 100-year flood (above 6-inch depth), based on the flood mapping completed as part of the JVR Energy Park project. To address the potential for flooding on the project site, the proposed project includes project design features PDF-HYD-1 and PDF-HYD-2. Under PDF-HYD-1, the proposed project would be designed in accordance with the County of San Diego Flood Damage Prevention Ordinance, County Hydrology Manual, and County Hydraulic Design Manual, which includes raising the finished floor elevation one (1) foot above base flood elevation. Under PDF-HYD-2, flood fencing would either be breakaway or flow through fencing. With the incorporation of project design features PDF-HYD-1 and PDF-HYD-2, the proposed project would not

exacerbate downslope or downstream flooding hazards. Therefore, the project would not expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. This impact would be less than significant.

**XXI. MANDATORY FINDINGS OF SIGNIFICANCE:**

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

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

Discussion/Explanation:

**Less than Significant with Mitigation Incorporated:** As detailed in this Initial Study, the proposed project has the potential to degrade the quality of the environment by resulting in potentially significant impacts on biological, cultural, and tribal cultural resources. Regarding biological resources, the project would have the potential to result in significant impacts on habitat, special-status wildlife species, and avian species protected under the MBTA and California Fish and Game Code. However, these impacts would be reduced to less than significant with the implementation of mitigation measures **MM-BIO-1** through **MM-BIO-4**. Additionally, construction of the proposed project would have the potential to encounter archaeological resources, human remains, and tribal cultural resources during ground-disturbing activities. However, these impacts would be reduced to less than significant with the implementation of mitigation measure **MM-CUL-1**.

Therefore, the project would not degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory. Impacts would be less than significant with mitigation incorporated.

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

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

Discussion/Explanation:

Table 9 provides a list of the past, present and probable future projects that were considered and evaluated as a part of this Initial Study.

**Table 9 Past, Present, and Probable Future Projects**

Project Name	Permit/Map Number	Description	Distance from Project Site	Significant Impacts Identified in CEQA Documents	Status
Jacumba Solar Energy Project	PDS 2014-MUP-14-041; PDS2014-ER-14-22-001	Up to 20 megawatts (MW) of alternating current (AC) generating capacity, consisting of approximately 81,108 PV modules fitted on 2,253 fixed-tilt rack panels (solar arrays). Located on 108 acres.	Approximately 2 miles to the east	<ul style="list-style-type: none"> <li>Aesthetics (Visual Character)</li> </ul>	Operational
JVR Energy Park	PDS2018-MUP-18-022; Log No. PDS2018-ER-18-22-001	Up to 90 MW of AC generating capacity, consisting of approximately 300,000 PV modules mounted on support structures (single-axis solar trackers). Located on 623 acres within the 1,356-acre privately-owned Project site.	Adjacent to the project site's western boundary	<ul style="list-style-type: none"> <li>Aesthetics (Visual Character and Long Distant Views from scenic roads, landmarks, and parks)</li> <li>Mineral Resources (loss of access to mineral resources due to habitat conservation easements)</li> </ul>	Project Approved. Initiation date for construction is unknown.

### Cumulative Setting

The Final EIR for the Jacumba Solar Energy Project identified significant and unavoidable aesthetic impacts related to the change in visual character that would occur with the project's implementation. No other significant and unavoidable impacts were identified.

The Draft Final EIR for the JVR Energy Park identified unavoidable significant aesthetic impacts related to the change in visual character as well as the aesthetic impact from long distance views from the surrounding area toward the JVR Energy Park project site. The Draft Final EIR also identified significant and unavoidable *cumulative* aesthetic impacts associated with changes to the visual character of the area and long-distance views if the JVR Energy Park project is constructed. Additionally, the Draft Final EIR for the JVR Energy Park identified significant impacts on mineral resources as a result of a habitat conservation easement that would preclude extraction of mineral resources.

The cumulative effect on aesthetics from these two projects would be considered cumulatively significant. However, the cumulative impact on mineral resources would be considered less than cumulatively significant because the impact is specific to the JVR Energy Park as it, alone, would preclude future access to an area that supports mineral resources through the proposed conservation easement.

### Project Contribution

**Less-than-Significant Impact.** As indicated above, significant cumulative impacts from projects listed in Table 9 include significant cumulative impacts on scenic vistas, views from sensitive resources such as scenic highways, and as a result of a change in the visual character of the area. Therefore, the analysis below evaluates whether the proposed project's incremental contribution to these significant cumulative impacts would be cumulatively considerable.

### ***Aesthetics***

As analyzed in items I(a), I(b), and I(c) in this IS/MND, the proposed project would not result in any significant aesthetic impacts.

### ***Scenic Vistas***

The project site does not contain any designated scenic vistas, is not located near or within the viewshed of a scenic vista, and is not visible from a scenic vista. Therefore, the proposed project would not substantially change the composition of an existing scenic vista and the project's incremental contribution to the cumulatively significant aesthetic impact on scenic views would not be cumulatively considerable.

*Visual Character/Views from Scenic Highways*

Old Highway 80 is designated as a County Scenic Highway from State Route 79 (Pine Valley) to I-8 (Jacumba) (County of San Diego 2011). Because the front of the new fire station would directly abut this portion of this designated segment of Old Highway 80, the proposed project would be visible to those traveling in either direction along the scenic highway, which, when combined with the JVR Energy Park, could be considered cumulatively considerable visual impact along the County scenic highway. However, the project is located near existing residential development to the west. Additionally, landscaping native to the site and local area would be planted along the perimeter of the project site in accordance with County guidelines to reduce views of the project by travelers on the road and the overall height of the fire station building and communications antenna would not exceed 30 feet and 40 feet, respectively. Furthermore, architectural features of the new fire station would include materials that complement the surrounding community and natural landscape. Exterior materials may include a combination of cast-in-place concrete, concrete masonry block, composite and steel architectural panels, exterior plaster, and exposed steel and/or wood framing. Furthermore, exterior wall construction would consist of steel or wood framing and moment-resisting assemblage of beams and columns with beams connected to columns, and cementitious plaster/fiber cement panel exterior finish, a weather barrier, and plywood wall sheathing. As such, materials would reflect the rural character of the community through the use of natural building materials such as wood or stone. Project design would conform to design requirements included in the County of San Diego General Plan and Central Mountain Subregional Plan. Given the small scale of the visual change along Highway 80 associated with the proposed project, the project features that would avoid a negative site aesthetic, and the site's proximity to existing residential development, the project's incremental contribution to the significant cumulative impact on visual character and views from a scenic highway would not be cumulatively considerable.

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

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

Discussion/Explanation:

**Less-than-Significant Impact:** As part of the evaluation of environmental impacts in this Initial Study, the potential for the project to result in adverse direct and indirect impacts on human beings were considered in the response to certain questions in sections I. Aesthetics, III. Air Quality, VII. Geology and Soils, IX. Hazards and Hazardous Materials, X. Hydrology and Water Quality, XIII. Noise, XIV. Population and Housing, and XVII. Transportation and Traffic. Based on the analysis contained in this Initial Study, no significant impacts on human beings would occur and no mitigation measures are required.

## **XXII. REFERENCES USED IN THE COMPLETION OF THE INITIAL STUDY CHECKLIST:**

*All references to Federal, State and local regulation are available on the Internet. For Federal regulation refer to <http://www4.law.cornell.edu/uscode/>. For State regulation refer to [www.leginfo.ca.gov](http://www.leginfo.ca.gov). For County regulation refer to [www.amlegal.com](http://www.amlegal.com). All other references are available upon request.*

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