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# Statement of Reasons for Exemption from Additional Environmental Review and 15183 Checklist

## Pursuant to CEQA Guidelines §15183

| | |
|---|---|
| **Date***:* | October 23, 2014 |
| **Project Title***:* | Nelson Grading Plan |
| **Record ID:** | PDS2008-2700-15413 |
| **Plan Area:** | Valley Center |
| **GP Designation**: | General Commercial (C-1) |
| **Density:** | NA |
| **Zoning:** | General Commercial (C36) |
| **Min. Lot Size:** | 6,000 & 0.5 acre/6,000 |
| **Special Area Reg.**: | B |
| **Lot Size:** | 6.44 acres (188-260-50) & 5.03 acres (188-260-49) |
| **Applicant:** | Jerry Gaughn (619) 204-8797 |
| **Staff Contact:** | Emmet Aquino (858) 694-8845<br>Emmet.Aquino@sdcounty.ca.gov |

## Project Description

The project is a major grading plan for the placement of excess fill of materials. This would result in the creation of two pads located south of the Valley Center Road and Miller Road intersection in the Valley Center Community Plan area, APN 188-260-49 and -50 (Portion). Access to the property would be from Indian Creek Road to the east. The site is currently vacant and earthwork would consist of a cut of 9 cubic yards, fill of 62,018 cubic yards and import of 62,009 cubic yards of materials. The fill material would be imported from an adjacent site located immediately to the north under an approved grading plan, file number PDS2012-2700-15688 (APN 188-231-34-00).

The project site is subject to the Village General Plan, General Commercial (C-1) Land Use Designation. Zoning for the site is General Commercial (C36). The project is consistent with lot size requirements of the General Plan and Zoning Ordinance as the project is a grading plan application with no proposed structures. The project is consistent with the development density established by the General Plan Update for which an Environmental Impact Report (EIR) was certified by the Board of Supervisors on August 3, 2011 (GPU EIR).

## Overview

California Public Resources Code section 21083.3 and California Environmental Quality Act (CEQA) Guidelines Section 15183 provide an exemption from additional environmental review for projects that are consistent with the development density established by existing zoning, community plan or general plan policies for which an Environmental Impact Report (EIR) was certified, except as might be necessary to examine whether there are project-specific significant effects which are peculiar to the

project or its site. Section 15183 specifies that examination of environmental effects shall be limited to those effects that: (1) Are peculiar to the project or the parcel on which the project would be located, and were not analyzed as significant effects in a prior EIR on the zoning action, general plan, or community plan, with which the project is consistent, (2) Are potentially significant off-site impacts and cumulative impacts which were not discussed in the prior EIR prepared for the general plan, community plan or zoning action, or (3) Are previously identified significant effects which, as a result of substantial new information which was not known at the time the EIR was certified, are determined to have a more severe adverse impact than discussed in the prior EIR. Section 15183(c) further specifies that if an impact is not peculiar to the parcel or to the proposed project, has been addressed as a significant effect in the prior EIR, or can be substantially mitigated by the imposition of uniformly applied development policies or standards, then an additional EIR need not be prepared for that project solely on the basis of that impact.

## General Plan Update Program EIR

The County of San Diego General Plan Update (GPU) establishes a blueprint for future land development in the unincorporated County that meets community desires and balances the environmental protection goals with the need for housing, agriculture, infrastructure, and economic vitality. The GPU applies to all of the unincorporated portions of San Diego County and directs population growth and plans for infrastructure needs, development, and resource protection. The GPU included adoption of new General Plan elements, which set the goals and policies that guide future development. It also included a corresponding land use map, a County Road Network map, updates to Community and Subregional Plans, an Implementation Plan, and other implementing policies and ordinances. The GPU focuses population growth in the western areas of the County where infrastructure and services are available in order to reduce the potential for growth in the eastern areas. The objectives of this population distribution strategy are to: 1) facilitate efficient, orderly growth by containing development within areas potentially served by the San Diego County Water Authority (SDCWA) or other existing infrastructure; 2) protect natural resources through the reduction of population capacity in sensitive areas; and 3) retain or enhance the character of communities within the unincorporated County. The SDCWA service area covers approximately the western one third of the unincorporated County. The SDWCA boundary generally represents where water and wastewater infrastructure currently exist. This area is more developed than the eastern areas of the unincorporated County, and would accommodate more growth under the GPU.

The GPU EIR was certified in conjunction with adoption of the GPU on August 3, 2011. The GPU EIR comprehensively evaluated environmental impacts that would result from Plan implementation, including information related to existing site conditions, analyses of the types and magnitude of project-level and cumulative environmental impacts, and feasible mitigation measures that could reduce or avoid environmental impacts.

## Summary of Findings

The Nelson Pad Grading Plan PDS2008-2700-15413 is consistent with the analysis performed for the GPU EIR. Further, the GPU EIR adequately anticipated and described the impacts of the proposed project, identified applicable mitigation measures necessary to reduce project specific impacts, and the project implements these mitigation measures (see http://www.sdcounty.ca.gov/PDS/gpupdate/docs/BOS_Aug2011/EIR/FEIR_7.00_-_Mitigation_Measures_2011.pdf for complete list of GPU Mitigation Measures.

A comprehensive environmental evaluation has been completed for the project as documented in the attached §15183 Exemption Checklist. This evaluation concludes that the project qualifies for an exemption from additional environmental review because it is consistent with the development density and use characteristics established by the County of San Diego General Plan, as analyzed by the San

Diego County General Plan Update Final Program EIR (GPU EIR, ER #02-ZA-001, SCH #2002111067), and all required findings can be made.

In accordance with CEQA Guidelines §15183, the project qualifies for an exemption because the following findings can be made:

1. **The project is consistent with the development density established by existing zoning, community plan or general plan policies for which an EIR was certified.**
   The project is a grading plan for the placement of excess fill of materials. The grading plan does not proposed any buildings and/or structures. The project would be consistent with the General Commercial (C-1) development density established by the General Plan and the certified GPU EIR.

2. **There are no project specific effects which are peculiar to the project or its site, and which the GPU EIR Failed to analyze as significant effects.**
   The subject property is no different than other properties in the surrounding area, and there are no project specific effects which are peculiar to the project or its site. The project site is located in an area with similarly sized lots with commercially designated properties to the east and west of the project site. The property does not support any peculiar environmental features, and the project would not result in any peculiar effects.

   In addition, as explained further in the 15183 Checklist below, all project impacts were adequately analyzed by the GPU EIR. The project could result in potentially significant impacts to biological and paleontological resources. However, applicable mitigation measures specified within the GPU EIR will be made prior to approval of the grading plan.

3. **There are no potentially significant off-site and/or cumulative impacts which the GPU EIR failed to evaluate.**
   The proposed project is consistent with the density and use characteristics of the development considered by the GPU EIR and would represent a small part of the growth that was forecast for build-out of the General Plan. The GPU EIR considered the incremental impacts of the proposed project, and as explained further in the 15183 Exemption Checklist below, no potentially significant off-site or cumulative impacts have been identified which were not previously evaluated.

4. **There is no substantial new information which results in more severe impacts than anticipated by the GPU EIR.**
   As explained in the 15183 exemption checklist below, no new information has been identified which would result in a determination of a more severe impact than what had been anticipated by the GPU EIR.

5. **The project will undertake feasible mitigation measures specified in the GPU EIR.**
   As explained in the 15183 exemption checklist below, the project will undertake feasible mitigation measures specified in the GPU EIR. These GPU EIR mitigation measures will be undertaken through project design, compliance with regulations and ordinances, and/or prior to approval of the grading plan.

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|---|---|
| | **October 23, 2014** |
| Signature | Date |
| **Emmet Aquino** | **Environmental Planner** |
| Printed Name | Title |

# CEQA Guidelines §15183 Exemption Checklist

**Overview**

This checklist provides an analysis of potential environmental impacts resulting from the proposed project. Following the format of CEQA Guidelines Appendix G, environmental effects are evaluated to determine if the project would result in a potentially significant impact triggering additional review under Guidelines section 15183.

- Items checked "Significant Project Impact" indicates that the project could result in a significant effect which either requires mitigation to be reduced to a less than significant level or which has a significant, unmitigated impact.

- Items checked "Peculiar Impact not identified by GPU EIR" indicates the project would result in a project specific significant impact (peculiar off-site or cumulative that was not identified in the GPU EIR.

- Items checked "Substantial New Information" indicates that there is new information which leads to a determination that a project impact is more severe than what had been anticipated by the GPU EIR.

A project does not qualify for a §15183 exemption if it is determined that it would result in: 1) a peculiar impact that was not identified as a significant impact under the GPU EIR; 2) a more severe impact due to new information; or 3) a potentially significant off-site impact or cumulative impact not discussed in the GPU EIR.

A summary of staff's analysis of each potential environmental effect is provided below the checklist for each subject area. A list of references, significance guidelines, and technical studies used to support the analysis is attached in Appendix A. Appendix B contains a list of GPU EIR mitigation measures.

| | Significant Project Impact | Peculiar Impact Not identified by GPU EIR | Substantial New Information |
|---|---|---|---|
| **1. AESTHETICS** – Would the Project: | | | |
| a) Have a substantial adverse effect on a scenic vista? | ☐ | ☐ | ☐ |
| b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway? | ☐ | ☐ | ☐ |
| c) Substantially degrade the existing visual character or quality of the site and its surroundings? | ☐ | ☐ | ☐ |
| d) Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area? | ☐ | ☐ | ☐ |

**Discussion**

1(a) The project would be visible from public roads and trails; however, the site is not located within a viewshed of a scenic vista.

1(b) The property is not within the viewshed of state scenic highway. The project site does not support any significant scenic resources that would be lost or modified through the proposed placement of fill materials on the project site.

1(c) The project would be consistent with existing community character. The project is located in an area characterized as vacant lands with residential and commercial uses. West of the project site along Valley Center Road are scattered residences. Farther to the east are commercial uses long the Valley Center Road and Cole Grade Road intersection. The proposed grading application would not substantially degrade the visual quality of the site or its surroundings.

1(d) The project is a grading plan to allow the placement of fill materials on the project site. The project consists of a grading plan and does not propose any lighting that would spillover onto adjacent properties and wound not adversely affect day or nighttime views.

**Conclusion**

As discussed above, the project would not result in any significant impacts to aesthetics; therefore, the project would not result in an impact which was not adequately evaluated by the GPU EIR.

| | Significant Project Impact | Peculiar Impact Not identified by GPU EIR | Substantial New Information |
|---|---|---|---|
| **2. Agriculture/Forestry Resources** – Would the Project: | | | |
| a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide or Local Importance as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, or other agricultural resources, to a non-agricultural use? | ☐ | ☐ | ☐ |

| | | | |
|---|---|---|---|
| b) Conflict with existing zoning for agricultural use, or a Williamson Act contract? | ☐ | ☐ | ☐ |
| c) Conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland zoned Timberland Production? | ☐ | ☐ | ☐ |
| 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? | ☐ | ☐ | ☐ |
| 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? | ☐ | ☐ | ☐ |

**Discussion**

2(a) The project site is not considered an agricultural resource, as defined by the "County Guidelines for Determining Significance / Report Format and Content Requirements for Agricultural Resources." There is no history of agricultural production within the last 20 years, no existing agricultural operations on the project site and there are no existent lands designated as Prime Farmland, Unique Farmland, or Farmland of Statewide or Local Importance as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency. Therefore, no agricultural resources including Prime Farmland, Unique Farmland, or Farmland of Statewide or Local Importance will be converted to a non-agricultural use.

The surrounding area, within radius of one-quarter mile, is designated as Farmland of Local Importance, an FMMP designation. As a result, the proposed project was reviewed by the County Agricultural Specialist and it was determined not to have significant adverse impacts related to the conversion of Prime Farmland, Unique Farmland, Farmland of Statewide or Local Importance or active agricultural operations to a non-agricultural use for the following reasons:

- The site is considered by the FMMP as Other Lands and is located within the General Plan Valley Center North Village.
- The surrounding lands are located within the Village area and along Valley Center Road, are zoned General Commercial.
- Although, within 100 feet to the east of the subject project site, the FMMP designates land as Farmland of Local Importance, the actual agricultural uses are located north of Valley Center Road and east of Cole Grade Road, approximately one-half mile from the project site.
- The proposed grading operation would not affect the continued agricultural production at the surrounding locations. Further, the existing agricultural production areas are also located within Valley Center North Village General Plan designation, which is meant to include high density residential land uses

and high intensity commercial lands. The General Plan Guiding Principles require preservation of existing agricultural lands in the Semi-Rural and Rural designations, which are located outside of the Village designations.

- The surrounding active agricultural operations are separated from proposed land uses on the project site one-half mile. These lands consist of row crops and fallow lands.

- Active agricultural operations in the surrounding area are already interspersed with single family residential and commercial uses. The proposed use would not significantly change the existing land uses in the area, resulting in a change that could convert agricultural operations to a non-agricultural use.

Therefore, no potentially significant project or cumulative level conversion of Prime Farmland, Unique Farmland, Farmland of Statewide Importance, or Farmland of Local Importance to a non-agricultural use will occur as a result of this project.

2(b) The project site is not located within or immediately adjacent to a Williamson Act contract or agriculturally zoned land.

2(c) There are no timberland production zones on or near the property.

2(d) The project site is not located near any forest lands.

2(e) The surrounding area, within radius of of one-quarter mile, is designated as Farmland of Local Importance, an FMMP designation. As a result, the proposed project was reviewed by the County Agricultural Specialist and it was determined not to have significant adverse impacts related to the conversion of Prime Farmland, Unique Farmland, Farmland of Statewide or Local Importance or active agricultural operations to a non-agricultural use for the following reasons:

- The site is considered by the FMMP as Other Lands and is located within the General Plan Valley Center North Village.

- The surrounding lands are located within the Village area and along Valley Center Road, are zoned General Commercial.

- Although, within 100 feet to the east of the subject project site, the FMMP designates land as Farmland of Local Importance, the actual agricultural uses are located north of Valley Center Road and east of Cole Grade Road, approximately one-half mile from the project site.

- The proposed grading operation on the subject site will not affect the continued agricultural production, at that off-site location. Further, the existing agricultural production areas are also located within Valley Center North Village General Plan designation, which is meant to include high density residential land uses and high intensity commercial lands. The General Plan Guiding Principles require preservation of existing agricultural lands in the Semi-Rural and Rural designations, which are located outside of the Village designations.

- The surrounding active agricultural operations are separated from proposed land uses on the project site one-half mile. These lands consist of row crops and fallow lands.

- Active agricultural operations in the surrounding area are already interspersed with single family residential and commercial uses. The proposed use would not significantly change the existing land uses in the area, resulting in a change that could convert agricultural operations to a non-agricultural use.

Therefore, no potentially significant project or cumulative level conversion of Prime Farmland, Unique Farmland, Farmland of Statewide Importance, or Farmland of Local Importance to a non-agricultural use will occur as a result of this project.

**Conclusion**
As discussed above, the project would not result in any significant impacts to agricultural resources; therefore, the project would not result in an impact which was not adequately evaluated by the GPU EIR.

| | Significant Project Impact | Peculiar Impact Not identified by GPU EIR | Substantial New Information |
|---|---|---|---|
| **3. Air Quality** – Would the Project: | | | |
| a) Conflict with or obstruct implementation of the San Diego Regional Air Quality Strategy (RAQS) or applicable portions of the State Implementation Plan (SIP)? | ☐ | ☐ | ☐ |
| b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation? | ☐ | ☐ | ☐ |
| c) 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 (including releasing emissions which exceed quantitative thresholds for ozone precursors)? | ☐ | ☐ | ☐ |
| d) Expose sensitive receptors to substantial pollutant concentrations? | ☐ | ☐ | ☐ |
| e) Create objectionable odors affecting a substantial number of people? | ☐ | ☐ | ☐ |

**Discussion**

3(a) The applicant proposes to place fill materials on the project site which would require the approval of a grading plan. An end use for the site is not proposed at this time; therefore, there would be no growth or operational emissions associated with the project. Air emissions would be limited to fugitive dust and criteria air pollutants emitted during grading and the placement of fill materials.. These emissions would be temporary and would cease at the completion of grading. Because the project would not lead to long-

term operational emissions under this action, it is not expected to conflict with either the RAQS or the SIP.

3(b) The applicant proposes to grade a portion of the project site to create large development pads on APN 188-260-49 and a portion of APN 188-260-50. Earthwork would consist of a cut of 9 cubic yards, fill of 62,018 cubic yards and import of 62,009 cubic yards of materials. The fill material would be imported from an adjacent site located to the north. Grading will take approximately 10 weeks to complete with a maximum daily intensity of 2,500 cubic yards per day. Grading emissions at this intensity would not exceed the County's screening level thresholds. Additionally, grading operations associated with the construction of the project would be subject to County of San Diego Grading Ordinance, which requires the implementation of dust control measures and San Diego Air Pollution Control District (SDAPCD) Rule 55. The applicant would be required to water the site three times daily and replace ground cover in disturbed areas when they become inactive. Emissions from the construction phase would be temporary and localized, resulting in pollutant emissions below the screening-level criteria established by the LUEG guidelines for determining significance. In addition, the project would not generate any vehicle trips after the grading is completed. As such, the project will not violate any air quality standard or contribute substantially to an existing or projected air quality violation.

3(c) San Diego County is presently in non-attainment for the 1-hour concentrations under the California Ambient Air Quality Standard (CAAQS) for Ozone ($O_3$). San Diego County is also presently in non-attainment for the annual geometric mean and for the 24-hour concentrations of Particulate Matter less than or equal to 10 microns ($PM_{10}$) and Particulate Matter less than or equal to 2.5 microns ($PM_{2.5}$) under the CAAQS. $O_3$ is formed when volatile organic compounds (VOCs) and nitrogen oxides ($NO_X$) react in the presence of sunlight. The project would contribute $PM_{10}$, $PM_{2.5}$, $NO_X$, and VOC emissions from construction/grading activities; however, the incremental increase would not exceed established screening thresholds (see question 3(b) above). Compliance with the County's Grading Ordinance and SDAPCD Rule 55 will ensure that fugitive dust emissions will be minimized at the property line.

3(d) The project is a major grading plan. No new receptors will be introduced by the project. Additionally, the project site is not located within a quarter-mile of any identified point source of significant emissions. There are scattered residential receptors located within a quarter-mile (the radius determined by the South Coast Air Quality Management District (SCAQMD) in which the dilution of pollutants is typically significant) of the proposed project. However, no receptors are located in the immediate vicinity of the proposed grading activities. Based on review by a PDS staff air quality specialist, this project does not propose uses or activities that would result in exposure of these identified sensitive receptors to significant pollutant concentrations and will not place sensitive receptors near carbon monoxide hotspots. Grading emissions will be temporary and localized and would be controlled through the implementation of dust control measures.

3(e) The project could produce objectionable odors, which would result from volatile organic compounds, ammonia, carbon dioxide, hydrogen sulfide, methane, alcohols, aldehydes, amines, carbonyls, esters, disulfides dust and endotoxins from the grading activities. However, these substances, if present at all, would only be in trace amounts (less that 1 µg/m3). Subsequently, no significant air quality – odor impacts are expected to affect

surrounding receptors. Moreover, the effects of objectionable odors are localized to the immediate surrounding area and will not contribute to a cumulatively considerable odor.

**Conclusion**
As discussed above, the project would not result in any significant impacts to air quality; therefore, the project would not result in an impact which was not adequately evaluated by the GPU EIR.

| | Significant Project Impact | Peculiar Impact Not identified by GPU EIR | Substantial New Information |
|---|---|---|---|
| **4. Biological Resources** – Would the Project: | | | |
| a) Have a substantial adverse effect, either directly or through habitat modifications, on any candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service? | ☐ | ☐ | ☐ |
| b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or US Fish and Wildlife Service? | ☒ | ☐ | ☐ |
| c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means? | ☐ | ☐ | ☐ |
| d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites? | ☐ | ☐ | ☐ |
| e) Conflict with the provisions of any adopted Habitat Conservation Plan, Natural Communities Conservation Plan, other approved local, regional or state habitat conservation plan or any other local policies or ordinances that protect biological resources? | ☐ | ☐ | ☐ |

**Discussion**
4(a) Biological resources on the project site were evaluated in a Biological Resources Letter Report prepared by Vincent Scheidt, dated February 2014, and a PDS addendum dated July 29, 2014. No List A or B sensitive plants or Group 1 wildlife species were observed (Group 2 listed orange–throated whiptail and coastal western whiptail were present) and raptors would be expected to forage in the vicinity including the grassland and woodland portions of the site. Other sensitive species are not expected due to the site's disturbed

nature and its proximity to a Mobility Element roadway. However, the site is located within future Pre-Approved Mitigation Area (PAMA) of the Draft North County Multiple Species Conservation Plan. The PAMA designation will not be in effect until the plan is approved, but these areas are considered for future preserve planning.

The PAMA associated with the project is intended to preserve connectivity along Keys Creek in northern Valley Center. Habitats that would be impacted on the 8.2-acre grading footprint (project site) include non-native grassland (NNG), disturbed habitat, urban/developed habitat, and coast live oak woodland (CLOW). The creek habitat trends east/west about 275 feet south of the proposed grading site. The creek habitat is characterized by a corridor of mature riparian vegetation up to 300-feet wide in a future PAMA planning area that is 1300 to 2000 feet wide in the vicinity of the project. Wildlife movement would be associated with Keys Creek and follow the creek's east/west direction south of the project site. A small tributary to Keys Creek is at least 100 feet south of the proposed grading footprint. The grading site is positioned adjacent and south of Valley Center Road in the most disturbed portion and at the outer edge of the PAMA.

The project site and this portion of the PAMA have been in an agricultural use area for many decades. There is existing commercial development adjacent on the west of the grading project (between the project and the creek). More intensive land uses (industrial and commercial) occur in the vicinity to the east of the project site. To the north, the proposed grading abuts an east-west portion of Valley Center Road, which is a busy transportation corridor and the main road through the area. The project is within an area that the County General Plan designates as "Village." Finally, there is a Mobility Element (ME) Road (Miller Road) planned immediately south of the project area. In the future, implementation of County plans for the area could isolate the grading project area from the surrounding habitat.

Impacts to NNG and CLOW will be mitigated off-site for at a ½-to-1 and a 3-to-1 ratio, respectively, in a County-approved location. In addition, a pre-grading avian nesting survey and/or breeding season avoidance on site grading will be implemented to provide project consistency with the Migratory Bird Treaty Act and the California Fish and Wildlife Code. The GPU EIR identified these mitigation measures as Bio 1.6 and Bio 1.7.

4(b) Based on the Biological Resources Letter Report, no wetlands or jurisdictional waters were found onsite or offsite. The following sensitive habitats were identified on the site: non-native grassland and coast live oak woodland, but, direct and indirect impacts to sensitive natural communities identified in the RPO, NCCP, Fish and Wildlife Code, and Endangered Species Act are mitigated through implementation of offsite habitat purchases.

As considered by the GPU EIR, project impacts to sensitive habitats will be mitigated through ordinance compliance and through implementation of the following mitigation measures: preservation of 3.1-acres of non-native grassland and 0.3 acre of oak woodland habitat within a formal mitigation bank or Director approved location and breeding season avoidance to prevent brushing, clearing, and/or grading between January 15 and August 31. The GPU EIR identified these mitigation measures as Bio 1.6 and Bio 1.7.

4(c) The proposed project site does not contain any wetlands as defined by Section 404 of the Clean Water Act, therefore, no impacts will occur.

4(d) The following discussion is based on a GIS analysis, site photos, a site visit by County staff, and a Biological Resources Letter Report with an addendum addressing wildlife movement. The site is on the edge of the draft PAMA planning area for Keys Creek as it goes through the village of Valley Center. PAMA wildlife movement follows Keys Creek moving east and west. The site does not assist in local wildlife movement as it lacks connecting vegetation due to surrounding land uses and its history as agricultural land. The functions of the off-site Keys Creek wildlife corridor would not be impacted by the project because the proposed grading is positioned adjacent to and south of 1,360 feet of Valley Center Road; the grading area is a narrow band of disturbance (about 250 feet wide) running parallel to the creek and it is at least 275 feet from the creek habitat, well outside of any wetland buffer. The biology report and addendum also indicates that the project site was not observed to be part of any wildlife movement area. Therefore, it was determined that the project site is not part of a regional linkage/corridor nor is it in an area considered regionally important for wildlife dispersal.

4(e) Even though grading permits are not subject to the Resource Protection Ordinance (RPO), the project would be consistent with RPO requirements because no RPO sensitive habitat lands or wetlands will be impacted and off-site mitigation will be required to compensate for the loss of significant habitat.

**Conclusion**
The project could result in potentially significant impacts to biological resources; however, further environmental analysis is not required because:

1. No peculiar impacts to the project or its site have been identified.

2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.

3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.

4. Feasible mitigation measures contained within the GPU EIR will be applied to the project.

| | Significant Project Impact | Peculiar Impact Not identified by GPU EIR | Substantial New Information |
|---|---|---|---|
| **5. Cultural Resources** – Would the Project: | | | |
| a) Cause a substantial adverse change in the significance of a historical resource as defined in 15064.5? | ☐ | ☐ | ☐ |
| b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to 15064.5? | ☐ | ☐ | ☐ |
| c) Directly or indirectly destroy a unique geologic feature? | ☐ | ☐ | ☐ |
| d) Directly or indirectly destroy a unique paleontological resource or site? | ☒ | ☐ | ☐ |

| | | | |
|---|---|---|---|
| e) Disturb any human remains, including those interred outside of formal cemeteries? | ☐ | ☐ | ☐ |

**Discussion**

5(a) Based on an analysis of County of San Diego cultural resource files, records, maps, and aerial photographs by County of San Diego staff archaeologist, Donna Beddow on November 7, 2013, it has been determined that the project site does not contain any historical resources. Three studies (Chace 84-84, 87-95, FosterD 00-10) have been completed which were negative. Therefore, the project would not result in impacts to historical resources.

5(b) Based on an analysis of County of San Diego cultural resource files, records, maps, and aerial photographs by County of San Diego staff archaeologist, Donna Beddow on November 7, 2013, it has been determined that the project site does not contain any archaeological resources. Three studies (Chace 84-84, 87-95, FosterD 00-10) have been completed which were negative. The project includes minimal grading (9 cubic yards); as such a grading monitoring program is not required. The project must comply with the San Diego County Grading, Clearing, and Watercourse Ordinance (§87.101-87.804), CEQA §15064.5(d), and §7050.5 of the Health & Safety Code. Section 87.429 of the Grading, Clearance, and Watercourse Ordinance requires the suspension of grading operations when human remains or Native American artifacts are encountered.
The Native American Heritage Commission (NAHC) was contacted (11/7/2013 and 12/15/2013) for a listing of Native American Tribes whose ancestral lands may be impacted by the project. To date, no response has been received from the NAHC. Once a response is received, the listed tribes will be contacted.

As considered by the GPU EIR, potential impacts to cultural resources will be mitigated through ordinance compliance. Grading monitoring (CUL-1.1 and Cul-2.5) is not required because the grading is minimal.

5(c) 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 nor does the site support any known geologic characteristics that have the potential to support unique geologic features.

5(d) A review of the County's Paleontological Resources Maps and data on San Diego County's geologic formations, the project is located on geological formations that potentially contain a low level of paleontological resources. Although the geological formations that underlie the project have a low probability of containing paleontological resources, monitoring during grading excavation would be required.

5(e) Based on an analysis of records and archaeological surveys of the property, it has been determined that the project site does not include a formal cemetery or any archaeological resources that might contain interred human remains.

**Conclusion**
The project could result in potentially significant impacts to cultural resources; however, further environmental analysis is not required because:

1. No peculiar impacts to the project or its site have been identified.

2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.

3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.

4. Feasible mitigation measures contained within the GPU EIR will be applied to the project.

| | Significant Project Impact | Peculiar Impact Not identified by GPU EIR | Substantial New Information |
|---|---|---|---|
| **6. Geology and Soils** – Would the Project: | | | |
| a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving: rupture of a known earthquake fault, strong seismic ground shaking, seismic-related ground failure, liquefaction, and/or landslides? | ☐ | ☐ | ☐ |
| b) Result in substantial soil erosion or the loss of topsoil? | ☐ | ☐ | ☐ |
| 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? | ☐ | ☐ | ☐ |
| d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property? | ☐ | ☐ | ☐ |
| e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater? | ☐ | ☐ | ☐ |

**Discussion**

6(a)(i) The project is not located in a fault rupture hazard zone identified by the Alquist-Priolo Earthquake Fault Zoning Act, Special Publication 42, Revised 1997, Fault-Rupture Hazards Zones in California, or located within any other area with substantial evidence of a known fault.

6(a)(ii) The project is a grading plan. No proposed buildings and structures are a part of this project. Additionally, any project proposing buildings must conform to the Seismic Requirements as outlined within the California Building Code. Compliance with the California Building Code and the County Building Code will ensure that the project will not result in a significant impact.

6(a)(iii) The project site is located within a "Potential Liquefaction Area" as identified in the County Guidelines for Determining Significance for Geologic Hazards. However, the project would not expose people or structures to potential substantial adverse effects. No structures are proposed as it relates to this grading plan. All future development would be subject to building permit review in which liquefaction would be required to be addressed.

6(a)(iv) The site is not located within a "Landslide Susceptibility Area" as identified in the County Guidelines for Determining Significance for Geologic Hazards.

6(b) The project is a grading plan to import approximately 62,000 cubic yards of materials. The project will not result in substantial soil erosion or the loss of topsoil because the project will be required to comply with the Watershed Protection Ordinance (WPO) and Grading Ordinance which will ensure that the project would not result in any unprotected erodible soils, will not alter existing drainage patterns, and will not develop steep slopes. Additionally, the project will be required to implement Best Management Practices (BMPs) to prevent fugitive sediment.

6(c) The project is not located on or near geological formations that are unstable or would potentially become unstable as a result of the project.

6(d) The project is underlain by Clayey alluvial land & Placentia sandy loam, which is considered to be an expansive soil as defined within Table 18-I-B of the Uniform Building Code (1994). However, the project will not result in a significant impact because compliance with the Building Code and implementation of standard engineering techniques will ensure structural safety. No structures are proposed as part of this grading plan. All future development would be subject to building permit review in which expansive soils would be required to be addressed.

6(e) The project will not rely on public water and sewer for the disposal of wastewater. No septic tanks or alternative wastewater disposal systems are proposed as the project is a grading plan.

**Conclusion**
As discussed above, the project would not result in any significant impacts to/from geology/soils; therefore, the project would not result in an impact which was not adequately evaluated by the GPU EIR.

| | Significant Project Impact | Peculiar Impact Not identified by GPU EIR | Substantial New Information |
|---|---|---|---|
| **7. Greenhouse Gas Emissions** – Would the Project: | | | |
| a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment? | ☐ | ☐ | ☐ |
| b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases? | ☐ | ☐ | ☐ |

**Discussion**

7(a) Greenhouse gas (GHG) emissions result in an increase in the earth's average surface temperature commonly referred to as global warming. This rise in global temperature is associated with long-term changes in precipitation, temperature, wind patterns, and other elements of the earth's climate system, known as climate change. These changes are now broadly attributed to GHG emissions, particularly those emissions that result from the human production and use of fossil fuels.

GHGs include carbon dioxide, methane, hydrofluorocarbons (HFCs), and nitrous oxide, among others. Human induced GHG emissions are a result of energy production and consumption, and personal vehicle use, among other sources. A regional GHG inventory prepared for the San Diego Region identified on-road transportation (cars and trucks) as the largest contributor of GHG emissions in the region, accounting for 46% of the total regional emissions. Electricity and natural gas combustion were the second (25%) and third (9%) largest regional contributors, respectively, to regional GHG emissions.

Climate changes resulting from GHG emissions could produce an array of adverse environmental impacts including water supply shortages, severe drought, increased flooding, sea level rise, air pollution from increased formation of ground level ozone and particulate matter, ecosystem changes, increased wildfire risk, agricultural impacts, ocean and terrestrial species impacts, among other adverse effects.

In 2006, the State passed the Global Warming Solutions Act of 2006, commonly referred to as AB 32, which set the greenhouse gas emissions reduction goal for the State of California into law. The law requires that by 2020, State emissions must be reduced to 1990 levels by reducing greenhouse gas emissions from significant sources via regulation, market mechanisms, and other actions.

Senate Bill 375 (SB 375), passed in 2008, links transportation and land use planning with global warming. It requires the California Air Resources Board (ARB) to set regional targets for the purpose of reducing greenhouse gas 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. SANDAG has prepared the region's Sustainable Communities Strategy (SCS) which is a new element of the 2050 Regional Transportation Plan (RTP). The strategy identifies how regional greenhouse gas reduction targets, as established by the ARB, will be achieved through development patterns, transportation infrastructure investments, and/or transportation measures or policies that are determined to be feasible.

It should be noted that an individual project's GHG emissions will generally not result in direct impacts under CEQA, as the climate change issue is global in nature, however an individual project could be found to contribute to a potentially significant cumulative impact. CEQA Guidelines Section 15130(f) states that an EIR shall analyze greenhouse gas emissions resulting from a proposed project when the incremental contribution of those emissions may be cumulatively considerable.

The County has prepared Guidelines for Determining Significance and Report Format and Content Requirements for addressing climate change in CEQA documents. The County has also adopted a Climate Action Plan (CAP) that includes GHG reduction

measures that, if fully implemented, would achieve an emissions reduction target that is consistent with the state-mandated reduction target embodied in AB 32. A set of project-specific implementing thresholds are included in the Draft Guidelines that will be used to ensure consistency of new project's with the County's CAP and the GHG emission reduction target. Development projects that could have cumulatively considerable GHG emissions impacts would need to incorporate relevant measures from the County's CAP and use one of the implementing thresholds from the Significance Guidelines-Efficiency Threshold, Bright Line Threshold, Stationary Source Threshold, or Performance Threshold-to assess significance. The Bright Line Threshold of 2,500 metric tons of carbon dioxide equivalent ($MTCO_2e$) per year is used to assess the project's impacts.

GHG emissions associated with grading activities were quantified by County Staff. Total GHG emissions associated with grading operations would be less than 100 metric tons per year. Total annual emissions would be below the Bright Line Threshold of 2,500 metric tons per year. Project GHG impacts would not be cumulatively considerable. Projects with emissions below the Bright Line Threshold are required to implement at least one GHG reduction measure from the CAP. Since the project's emissions would occur over a finite period and cease at the end of grading, none of the CAP measures that are relevant to long-term operation of projects would be applicable to the proposed project.

Furthermore, projects that generate less than 2,500 $MTCO_2e$ per year of GHG will also participate in emission reductions because air emissions including GHGs are under the purview of the California Air Resources Board (CARB) (or other regulatory agencies) and will be "regulated" either by CARB, the Federal Government, or other entities. For example, new vehicles will be subject to increased fuel economy standards and emission reductions, large and small appliances will be subject to more strict emissions standards, and energy delivered to consumers will increasingly come from renewable sources. As a result, even the emissions that result from projects that produce less than 2,500 $MTCO_2e$ per year of GHG will be subject to emission reductions.

7(b) In 2006, the State passed the Global Warming Solutions Act of 2006, commonly referred to as AB 32, which set the greenhouse gas emissions reduction goal for the State of California into law. The law requires that by 2020, State emissions must be reduced to 1990 levels by reducing greenhouse gas emissions from significant sources via regulation, market mechanisms, and other actions.

Senate Bill 375 (SB 375), passed in 2008, links transportation and land use planning with global warming. It requires the California Air Resources Board (ARB) to set regional targets for the purpose of reducing greenhouse gas 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. SANDAG has prepared the region's Sustainable Communities Strategy (SCS) which is a new element of the 2050 Regional Transportation Plan (RTP). The strategy identifies how regional greenhouse gas reduction targets, as established by the ARB, will be achieved through development patterns, transportation infrastructure investments, and/or transportation measures or policies that are determined to be feasible.

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 climate change policies. These policies provide direction for individual development projects to reduce GHG emissions and help the County meet its GHG emission reduction targets. The County has also adopted a Climate Action Plan (CAP) that includes GHG reduction measures that, if fully implemented, would achieve an emissions reduction target that is consistent with the state-mandated reduction target embodied in AB 32. A set of project-specific implementing thresholds are included in the Draft Guidelines that will be used to ensure consistency of new project's with the County's CAP and the GHG emission reduction target.

As discussed in 7(a) above, the project's emissions would be below the Bright Line Threshold. The project's emissions would occur only during the duration of grading activities and would cease at completion of such activities. As such, the project would not conflict with the County CAP. Therefore, the project would not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

**Conclusion**
As discussed above, the project would not result in any significant impacts to greenhouse gas emissions; therefore, the project would not result in an impact which was not adequately evaluated by the GPU EIR.

| | Significant Project Impact | Peculiar Impact Not identified by GPU EIR | Substantial New Information |
|---|---|---|---|
| **8. Hazards and Hazardous Materials** – Would the Project: | | | |
| a) Create a significant hazard to the public or the environment through the routine transport, storage, use, or disposal of hazardous materials or wastes or through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment? | ☐ | ☐ | ☐ |
| b) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school? | ☐ | ☐ | ☐ |
| c) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, or is otherwise known to have been subject to a release of hazardous substances and, as a result, would it create a significant hazard to the public or the environment? | ☐ | ☐ | ☐ |
| d) 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 for people residing or working in the project area? | | | |
| e) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area? | ☐ | ☐ | ☐ |
| f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan? | ☐ | ☐ | ☐ |
| g) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands? | ☐ | ☐ | ☐ |
| h) Propose a use, or place residents adjacent to an existing or reasonably foreseeable use that would substantially increase current or future resident's exposure to vectors, including mosquitoes, rats or flies, which are capable of transmitting significant public health diseases or nuisances? | ☐ | ☐ | ☐ |

**Discussion**

8(a) The project will not create a significant hazard to the public or the environment because it does not propose the storage, use, transport, emission, or disposal of Hazardous Substances, nor are Hazardous Substances proposed or currently in use in the immediate vicinity. The project is a grading plan and the project does not propose to demolish any existing structures onsite which could produce a hazard related to the release of asbestos, lead based paint or other hazardous materials.

8(b) The project is not located within one-quarter mile of an existing or proposed school.

8(c) Based on a site visit and a comprehensive review of regulatory databases (see attached Hazards/Hazardous Materials references), the project site has not been subject to a release of hazardous substances. Additionally, the project does not propose structures for human occupancy or significant linear excavation within 1,000 feet of an open, abandoned, or closed landfill, is not located on or within 250 feet of the boundary of a parcel identified as containing burn ash (from the historic burning of trash), and is not on or within 1,000 feet of a Formerly Used Defense Site.

8(d) The proposed project is not located within an Airport Land Use Compatibility Plan (ALUCP), an Airport Influence Area, or a Federal Aviation Administration Height Notification Surface. Also, the project does not propose construction of any structure equal to or greater than 150 feet in height, constituting a safety hazard to aircraft and/or operations from an airport or heliport.

8(e) The proposed project is not within one mile of a private airstrip.

8(f)(i) OPERATIONAL AREA EMERGENCY PLAN AND MULTI-JURISDICTIONAL HAZARD MITIGATION PLAN: The project will not interfere with this plan because it will not

prohibit subsequent plans from being established or prevent the goals and objectives of existing plans from being carried out.

8(f)(ii) SAN DIEGO COUNTY NUCLEAR POWER STATION EMERGENCY RESPONSE PLAN: The property is not within the San Onofre emergency planning zone.

8(f)(iii) OIL SPILL CONTINGENCY ELEMENT: The project is not located along the coastal zone.

8(f)(iv) EMERGENCY WATER CONTINGENCIES ANNEX AND ENERGY SHORTAGE RESPONSE PLAN: The project would not alter major water or energy supply infrastructure which could interfere with the plan.

8f)(v) DAM EVACUATION PLAN: The project is not located within a dam inundation zone.

8(g) The proposed project is adjacent to wildlands that have the potential to support wildland fires. However, the project will not expose people or structures to a significant risk of loss, injury or death involving wildland fires because the project is a grading plan and does not propose any structures.

8(h) The project does not involve or support uses that would allow water to stand for a period of 72 hours or more (e.g. artificial lakes, agricultural ponds). Also, the project does not involve or support uses that will produce or collect animal waste, such as equestrian facilities, agricultural operations (chicken coops, dairies etc.), solid waste facility or other similar uses. Moreover, based on a site visit conducted by County staff, there are none of these uses on adjacent properties.

**Conclusion**
As discussed above, the project would not result in any significant impacts to/from hazards/hazardous materials; therefore, the project would not result in an impact which was not adequately evaluated by the GPU EIR.

| | Significant Project Impact | Peculiar Impact Not identified by GPU EIR | Substantial New Information |
|---|---|---|---|
| **9. Hydrology and Water Quality** – Would the Project: | | | |
| a) Violate any waste discharge requirements? | ☐ | ☐ | ☐ |
| b) Is the project tributary to an already impaired water body, as listed on the Clean Water Act Section 303(d) list? If so, could the project result in an increase in any pollutant for which the water body is already impaired? | ☐ | ☐ | ☐ |
| c) Could the proposed project cause or contribute to an exceedance of applicable surface or groundwater receiving water quality objectives or degradation of beneficial uses? | ☐ | ☐ | ☐ |
| d) 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)? | | | |
| e) 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? | ☐ | ☐ | ☐ |
| f) 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? | ☐ | ☐ | ☐ |
| g) Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems? | ☐ | ☐ | ☐ |
| h) Provide substantial additional sources of polluted runoff? | ☐ | ☐ | ☐ |
| i) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map, including County Floodplain Maps? | ☐ | ☐ | ☐ |
| j) Place within a 100-year flood hazard area structures which would impede or redirect flood flows? | ☐ | ☐ | ☐ |
| k) Expose people or structures to a significant risk of loss, injury or death involving flooding? | ☐ | ☐ | ☐ |
| l) Expose people or structures to a significant risk of loss, injury or death involving flooding as a result of the failure of a levee or dam? | ☐ | ☐ | ☐ |
| m) Inundation by seiche, tsunami, or mudflow? | ☐ | ☐ | ☐ |

**Discussion**

9(a) The project will require a NPDES General Permit for Discharges of Storm Water Associated with Construction Activities. The project applicant has provided a Stormwater Management Plan (SWMP) which demonstrates that the project will comply with all requirements of the WPO. The project will be required to implement site design measures, source control BMPs, and/or treatment control BMPs to reduce potential pollutants to the maximum extent practicable. These measures will enable the project to meet waste discharge requirements as required by the San Diego Municipal Permit, as implemented by the San Diego County Jurisdictional Urban Runoff Management Program (JURMP) and Standard Urban Storm Water Mitigation Plan (SUSMP).

9(b) The project lies in the Rincon (903.16) hydrologic subarea, within the San Luis Rey hydrologic unit. There are no impaired water bodies according to the Clean Water Act Section 303(d) list. The project will comply with the WPO and implement site design measures, source control BMPs, and treatment control BMPs to prevent a significant increase of pollutants to receiving waters.

9(c) As stated in responses 9(a) and 9(b) above, implementation of BMPs and compliance with required ordinances will ensure that project impacts are less than significant.

9(d) The project is a grading plan and would not use any groundwater as it relates to grading activities. In addition, the project does not involve operations that would interfere substantially with groundwater recharge.

9(e) As outlined in the project's SWMP, the project will implement source control and/or treatment control BMP's to reduce potential pollutants, including sediment from erosion or siltation, to the maximum extent practicable from entering storm water runoff.

9(f) The project will not significantly alter established drainage patterns or significantly increase the amount of runoff for the following reasons: based on a Drainage Study prepared by Gary Lipska, R.C.E. on October 22, 2013, drainage will be conveyed to either natural drainage channels or approved drainage facilities.

9(g) The project does not propose to create or contribute runoff water that would exceed the capacity of existing or planned storm water drainage systems.

9(h) The project has the potential to generate pollutants; however, site design measures, source control BMPs, and treatment control BMPs will be employed such that potential pollutants will be reduced to the maximum extent practicable.

9(i) No housing will be placed within a FEMA mapped floodplain or County-mapped floodplain or drainage with a watershed greater than 25 acres.

9(j) No 100-year flood hazard areas were identified on the project site or offsite improvement locations.

9(k) The project site lies outside any identified special flood hazard area.

9(l) The project site lies outside a mapped dam inundation area for a major dam/reservoir within San Diego County. In addition, the project is not located immediately downstream of a minor dam that could potentially flood the property.

9(m)(i) SEICHE: The project site is not located along the shoreline of a lake or reservoir.

9(m)(ii) TSUNAMI: The project site is not located in a tsunami hazard zone.

9(m)(iii) MUDFLOW: Mudflow is type of landslide. See response to question 6(a)(iv).

**Conclusion**
As discussed above, the project would not result in any significant impacts to/from hydrology/water quality; therefore, the project would not result in an impact which was not adequately evaluated by the GPU EIR.

| | Significant Project Impact | Peculiar Impact not identified by GPU EIR | Substantial New Information |
|---|---|---|---|
| **10. Land Use and Planning** – Would the Project: | | | |
| a) Physically divide an established community? | ☐ | ☐ | ☐ |
| b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect? | ☐ | ☐ | ☐ |

**Discussion**

10(a) The project does not propose the introduction of new infrastructure such as major roadways, water supply systems, or utilities to the area.

10(b) The project would not conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect, including policies of the General Plan and Community Plan.

**Conclusion**
As discussed above, the project would not result in any significant impacts to land use/planning; therefore, the project would not result in an impact which was not adequately evaluated by the GPU EIR.

| | Significant Project Impact | Peculiar Impact Not identified by GPU EIR | Substantial New Information |
|---|---|---|---|
| **11. 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? | ☐ | ☐ | ☐ |
| 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? | ☐ | ☐ | ☐ |

11(a) The project site has been classified by the California Department of Conservation – Division of Mines and Geology as MRZ-4 which are areas of unknown mineral resource potential. Therefore, the project will not result in the loss of a known mineral resource.

11(b) The project site is not delineated on a local general plan, specific plan or other land use plan and therefore would not result in the loss of availability of a locally-important mineral resource recovery site.

**Conclusion**
As discussed above, the project would not result in any significant impacts to mineral resources; therefore, the project would not result in an impact which was not adequately evaluated by the GPU EIR.

| | Significant Project Impact | Peculiar Impact Not identified by GPU EIR | Substantial New Information |
|---|---|---|---|
| **12. Noise** – Would the Project: | | | |
| a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies? | ☐ | ☐ | ☐ |
| b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels? | ☐ | ☐ | ☐ |
| c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project? | ☐ | ☐ | ☐ |
| d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project? | ☐ | ☐ | ☐ |
| 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 expose people residing or working in the project area to excessive noise levels? | ☐ | ☐ | ☐ |
| f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels? | ☐ | ☐ | ☐ |

**Discussion**

12(a) The project will not expose people to potentially significant noise levels that exceed the allowable limits of the General Plan, Noise Ordinance, or other applicable standards for the following reasons:

General Plan – Noise Element: Noise sensitive areas requires projects to comply with a Community Noise Equivalent Level (CNEL) of 60 and 65 decibels (dBA) for proposed noise sensitive land uses. The project is a grading plan that does not propose any noise sensitive receptors. Therefore, the project would not expose existing or planned noise sensitive areas to noise in excess of 60 dB(A).

Noise Ordinance – Section 36.404: Non-transportation noise generated by the project is not expected to exceed the standards of the Noise Ordinance at or beyond the project's property line. The project is a grading plan and no permanent noise sources are proposed as part of this project. Therefore, the project does not involve any noise

producing equipment that would exceed applicable noise levels at the adjoining property line.

Noise Ordinance – Section 36.408 & 409: The project will not generate construction noise in excess of Noise Ordinance standards. Construction operations will occur only during permitted hours of operation. Also, it is not anticipated that the project will operate construction equipment in excess of an average sound level of 75dB between the hours of 7 AM and 7 PM.

12(b) The project does not propose any of the following land uses that can be impacted by groundborne vibration or groundborne noise levels.

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

Also, the project does not propose any major, new or expanded infrastructure such as mass transit, highways or major roadways or intensive extractive industry that could generate excessive groundborne vibration or groundborne noise levels on-site or in the surrounding area.

12(c) As indicated in the response listed under Section 12(a), the project would not expose existing or planned noise sensitive areas in the vicinity to a substantial permanent increase in noise levels that exceed the allowable limits of any applicable noise standards. Also, the project is a grading plan and does not propose any noise sensitive receptors on-site. No permanent noise sources are anticipated as it relates to this grading plan application. The project is not expected to expose existing or planned noise sensitive areas to noise 10 dB CNEL over existing ambient noise levels.

12(d) The project does not involve any operational uses that may create substantial temporary or periodic increases in ambient noise levels in the project vicinity. Also, general construction noise is not expected to exceed the construction noise limits of the Noise Ordinance. Construction operations will occur only during permitted hours of operation. Also, the project will not operate construction equipment in excess of 75 dB for more than an 8 hours during a 24 hour period.

12(e) The project is not located within an Airport Land Use Compatibility Plan (ALUCP) for airports or within 2 miles of a public airport or public use airport.

12(f) The project is not located within a one-mile vicinity of a private airstrip.

**Conclusion**

As discussed above, the project would not result in any significant impacts to/from noise; therefore, the project would not result in an impact which was not adequately evaluated by the GPU EIR.

| | Significant Project Impact | Peculiar Impact Not identified by GPU EIR | Substantial New Information |
|---|---|---|---|
| **13. 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)? | ☐ | ☐ | ☐ |
| b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere? | ☐ | ☐ | ☐ |
| c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere? | ☐ | ☐ | ☐ |

**Discussion**

13(a) The project will not induce substantial population growth in an area because the project does not propose any physical or regulatory change that would remove a restriction to or encourage population growth in an area. Additionally, the project is a grading plan for the placement of fill materials. No structures are proposed as part of this project..

13(b) The project will not displace existing housing.

13(c) The proposed project will not displace a substantial number of people since the site is currently vacant and the project is for temporary grading operations.

**Conclusion**

As discussed above, the project would not result in any significant impacts to populations/housing; therefore, the project would not result in an impact which was not adequately evaluated by the GPU EIR.

| | Significant Project Impact | Peculiar Impact Not identified by GPU EIR | Substantial New Information |
|---|---|---|---|
| **14. Public Services** – Would the Project: | | | |
| a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance service ratios for fire protection, police protection, schools, parks, or other public facilities? | ☐ | ☐ | ☐ |

**Discussion**

14(a) The project is a grading plan for the placement of fill materials on site that would not result in the need for significantly altered services or facilities.

**Conclusion**
As discussed above, the project would not result in any significant impacts to public services; therefore, the project would not result in an impact which was not adequately evaluated by the GPU EIR.

| | Significant Project Impact | Peculiar Impact Not identified by GPU EIR | Substantial New Information |
|---|---|---|---|
| **15. Recreation** – Would the Project: | | | |
| a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated? | ☐ | ☐ | ☐ |
| b) Does the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment? | ☐ | ☐ | ☐ |

**Discussion**

15(a) The project is a grading plan and would not incrementally increase the use of existing parks and other recreational facilities; However, projects would typically be required to pay fees or dedicate land for local parks pursuant to the Park Land Dedication Ordinance.

15(b) The project is a grading plan for the placement of fill materials. The project does not include trails and/or pathways. Impacts from these amenities have been considered as part of the overall environmental analysis contained elsewhere in this document.

**Conclusion**
As discussed above, the project would not result in any significant impacts to recreation; therefore, the project would not result in an impact which was not adequately evaluated by the GPU EIR.

| | Significant Project Impact | Peculiar Impact Not identified by GPU EIR | Substantial New Information |
|---|---|---|---|
| **16. Transportation and Traffic** – Would the Project: | | | |
| a) Conflict with an applicable plan, ordinance or policy establishing measures of the effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths and mass transit? | ☐ | ☐ | ☐ |
| b) Conflict with an applicable congestion management | ☐ | ☐ | ☐ |

| | | | |
|---|---|---|---|
| program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways? | | | |
| c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks? | ☐ | ☐ | ☐ |
| d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)? | ☐ | ☐ | ☐ |
| e) Result in inadequate emergency access? | ☐ | ☐ | ☐ |
| f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities? | ☐ | ☐ | ☐ |

**Discussion**

16(a) The project will not result in an additional ADT other than the temporary grading operations. The project will not conflict with any established performance measures because the project does not propose any trips. In addition, the project would not conflict with policies related to non-motorized travel such as mass transit, pedestrian or bicycle facilities.

16(b) The project does not propose any ADT, therefore the project does not exceed the 2400 trips (or 200 peak hour trips) required for study under the region's Congestion Management Program as developed by SANDAG.

16(c) The proposed project is located outside of an Airport Influence Area and is not located within two miles of a public or public use airport.

16(d) The proposed project will not alter traffic patterns, roadway design, place incompatible uses (e.g., farm equipment) on existing roadways, or create curves, slopes or walls which would impede adequate sight distance on a road.

16(e) The Valley Center Fire Protection District (VCFPD) and the San Diego County Fire Authority have reviewed the project and have preliminarily determined that there is adequate emergency fire access. The proposed grading plan would also require formal approval from the local FPD prior to approval of any grading plan.

16(f) The project will not result in the construction of any road improvements or new road design features that would interfere with the provision of public transit, bicycle or pedestrian facilities. In addition, the project does not generate sufficient travel demand to increase demand for transit, pedestrian or bicycle facilities.

**Conclusion**

As discussed above, the project would not result in any significant impacts to transportation/traffic; therefore, the project would not result in an impact which was not adequately evaluated by the GPU EIR.

| | Significant Project Impact | Peculiar Impact Not identified by GPU EIR | Substantial New Information |
|---|---|---|---|
| **17. Utilities and Service Systems** – Would the Project: | | | |
| a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board? | ☐ | ☐ | ☐ |
| b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects? | ☐ | ☐ | ☐ |
| c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects? | ☐ | ☐ | ☐ |
| d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed? | ☐ | ☐ | ☐ |
| e) Result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments? | ☐ | ☐ | ☐ |
| f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs? | ☐ | ☐ | ☐ |
| g) Comply with federal, state, and local statutes and regulations related to solid waste? | ☐ | ☐ | ☐ |

**Discussion**

17(a) The project is a grading plan and would not exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board.

17(b) The project is a grading plan and does not involve new water and wastewater pipeline extensions.

17(c) The project involves new storm water drainage facilities. However, these extensions will not result in additional adverse physical effects beyond those already identified in other sections of this environmental analysis.

17(d) The project has sufficient water supply, no entitlements are needed.

17(e) The project is a grading plan and does not require wastewater treatment.

17(f) The project is a grading plan and does not require solid waste facility permits to operate.

17(g) The project is a grading plan and would not produce solid waste.

**Conclusion**
As discussed above, the project would not result in any significant impacts to utilities and service systems; therefore, the project would not result in an impact which was not adequately evaluated by the GPU EIR.

**Attachments:**
Appendix A – References
Appendix B – Summary of Determinations and Mitigation within the Final Environmental Impact Report, County of San Diego General Plan Update, SCH # 2002111067

# Appendix A

The following is a list of project specific technical studies used to support the analysis of each potential environmental effect:

Gary Lipska (10/22/13) Drainage Study
Gary Lipska (2/6/13) Minor SWMP
Vince Scheidt (February 2014) Summary Biology Report
Maggie Loy (July 29, 2014) Addendum for Nelson Grading Permit Biological Letter Report

For a complete list of technical studies, references, and significance guidelines used to support the analysis of the General Plan Update Final Certified Program EIR, dated August 3, 2011, please visit the County's website at:

http://www.sdcounty.ca.gov/PDS/gpupdate/docs/BOS_Aug2011/EIR/FEIR_5.00_-_References_2011.pdf

# Appendix B

A Summary of Determinations and Mitigation within the Final Environmental Impact Report, County of San Diego General Plan Update, SCH # 2002111067 is available on the Planning and Development Services website at:
http://www.sdcounty.ca.gov/pds/gpupdate/GPU_FEIR_Summary_15183_Reference.pdf