



# County of San Diego

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## **Statement of Reasons for Exemption from Additional Environmental Review and 15183 Checklist Pursuant to CEQA Guidelines §15183**

**Date:** September 21, 2017  
**Project Title:** Gildred Tentative Parcel Map  
**Record ID:** PDS2010-3200-21176, LOG NO. PDS2010-3910-1009003  
**Plan Area:** Ramona  
**GP Designation:** Semi-Rural Residential (SR-10)  
**Density:** N/A  
**Zoning:** General Agriculture (A72)  
**Min. Lot Size:** 10 acres  
**Special Area Reg.:** N/A  
**Lot Size:** 53.11  
**Applicant:** James E. Whalen, (619) 683-5544  
**Staff Contact:** Bronwyn Brown, (858) 495-5516  
[Bronwyn.Brown@sdcounty.ca.gov](mailto:Bronwyn.Brown@sdcounty.ca.gov)

### **Project Description**

The project is a minor subdivision to divide a 53.11 acre property into four lots. The project site is located at 1264 Highland Valley Road in the Ramona Community Planning Area. The site contains an existing avocado orchard that would be retained. Access to the site would be provided by driveways connecting to Highland Valley Road (Parcels 1 and 2) and Highland Trails Drive (Parcels 3 and 4). The project would be served by an on-site wastewater treatment system and imported water from the Ramona Municipal Water District. Proposed grading will consist of 51,400 cubic yards of cut and fill for pads and driveways. The project includes biological open space easements which total 33.9 acres, and 1.37 acres of steep slope easement.

The project site is subject to the Semi-Rural General Plan Regional Category, Land Use Designation Semi-Rural (SR-10). Zoning for the site is General Agriculture (A72). The project is consistent with density and lot size requirements of the General Plan and Zoning Ordinance.

### **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 Gildred Tentative Parcel Map (PDS2010-3200-21176) 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. For a complete list of GPU mitigation measures, see:

[http://www.sdcounty.ca.gov/PDS/gpupdate/docs/BOS\\_Aug2011/EIR/FEIR\\_7.00 -  
Mitigation Measures 2011.pdf](http://www.sdcounty.ca.gov/PDS/gpupdate/docs/BOS_Aug2011/EIR/FEIR_7.00_-_Mitigation_Measures_2011.pdf)

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 would subdivide a 53.11-acre property into four lots, which is consistent with the Semi-Rural (SR-10) 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 developed with similarly sized, estate residential lots with associated accessory uses. 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, cultural resources, and noise. However, applicable mitigation measures specified within the GPU EIR have been made conditions of approval for this project.
- 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, or through the project's conditions of approval.

|   |  |
|---|--|
| _____<br>Signature                            | _____<br><b>September 21, 2017</b><br>Date |
| _____<br><b>Bronwyn Brown</b><br>Printed Name | _____<br><b>Project Manager</b><br>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 “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<br>Project<br>Impact | Impact not<br>identified by GPU<br>EIR | Substantial<br>New<br>Information |
|--|----------------------------------|--|-----------------------------------|
| <b>1. AESTHETICS</b> – Would the Project:  |                                  |  |                                   |
| a) Have a substantial adverse effect on a scenic vista?  | <input type="checkbox"/>         | <input type="checkbox"/>               | <input type="checkbox"/>          |
| b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway? | <input type="checkbox"/>         | <input type="checkbox"/>               | <input type="checkbox"/>          |
| c) Substantially degrade the existing visual character or quality of the site and its surroundings?  | <input type="checkbox"/>         | <input type="checkbox"/>               | <input type="checkbox"/>          |
| d) Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?                                   | <input type="checkbox"/>         | <input type="checkbox"/>               | <input type="checkbox"/>          |

### 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 project site is not within the viewshed of a State-designated scenic highway. The project would be visible from Highland Valley Road, which is designated as a County Scenic Highway per the General Plan. The project is a minor subdivision to divide an approximately 53-acre site into four lots, consistent with the density and lot size requirements of the General Plan and Zoning Ordinance. The project would include a 24.22 acres of agricultural easement, 9.66 acres of biological open space, and 1.37 acres of steep slope easement within the project site; thus approximately 66 percent of the project site would not be developed. Therefore, the project would not significantly impact the County Scenic Highway.
- 1(c) The project would be consistent with existing community character. The project is located along Highland Valley Road in an area characterized by agricultural, open space and residential uses. The addition of four new residential parcels on an approximately 53-acre project site would not substantially degrade the visual quality of the site or its surroundings.
- 1(d) Residential lighting would be required to conform with the County's Light Pollution Code to prevent spillover onto adjacent properties and minimize impacts to dark skies.

### 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<br>Project<br>Impact | Impact not<br>identified by GPU<br>EIR | Substantial<br>New<br>Information |
|--|----------------------------------|--|-----------------------------------|
| <b>2. Agriculture/Forestry Resources</b>   |                                  |  |                                   |
| – 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? | <input type="checkbox"/>         | <input type="checkbox"/>               | <input type="checkbox"/>          |
| b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?   | <input type="checkbox"/>         | <input type="checkbox"/>               | <input type="checkbox"/>          |
| c) Conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland zoned Timberland Production?  | <input type="checkbox"/>         | <input type="checkbox"/>               | <input type="checkbox"/>          |
| 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"/>         | <input type="checkbox"/>               | <input type="checkbox"/>          |
| 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"/>         | <input type="checkbox"/>               | <input type="checkbox"/>          |

**Discussion**

- 2(a) The project and surrounding properties do not support any Farmland of Local Importance, Prime Farmland, Unique Farmland, or Farmland of Statewide Importance.
- 2(b) The project site is located within agriculturally zoned land, General Agriculture (A20). A Local Agricultural Resources Assessment (LARA) Model was prepared by the County's Agricultural Resources specialist. Based on the results of the LARA Model, the project site is not considered an important agricultural resource. The site received a low rating for soil quality. The site received a high rating for climate and a moderate rating for water resources. To be considered an important agricultural resource under the LARA Model, the three required factors (soils/water resources/climate) must rate either high or moderate. If one factor rates low, the property is not considered an important agricultural resource. Therefore, the site's low soil quality rating means that the site is not an important agricultural resource.
- 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 project site is not located near any important farmlands or active agricultural production areas.

**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<br>Project<br>Impact | Impact not<br>identified by GPU<br>EIR | Substantial<br>New<br>Information |
|---|----------------------------------|--|-----------------------------------|
| <b>3. Air Quality – Would the Project:</b>  |                                  |  |                                   |
| a) Conflict with or obstruct implementation of the San Diego Regional Air Quality Strategy (RAQS) or applicable portions of the State Implementation Plan (SIP)?  | <input type="checkbox"/>         | <input type="checkbox"/>               | <input type="checkbox"/>          |
| b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?  | <input type="checkbox"/>         | <input type="checkbox"/>               | <input type="checkbox"/>          |
| 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)? | <input type="checkbox"/>         | <input type="checkbox"/>               | <input type="checkbox"/>          |
| d) Expose sensitive receptors to substantial pollutant concentrations?  | <input type="checkbox"/>         | <input type="checkbox"/>               | <input type="checkbox"/>          |
| e) Create objectionable odors affecting a substantial number of people?   | <input type="checkbox"/>         | <input type="checkbox"/>               | <input type="checkbox"/>          |

**Discussion**

- 3(a) The project proposes development that was anticipated and considered by the San Diego Association of Governments (SANDAG) growth projections used in development of the RAQS and SIP. As such, the project would not conflict with either the RAQS or the SIP. In addition, construction and operational emissions from the project are anticipated to be below established screening-level thresholds (SLTs), as addressed under question 3(b) below, and will not violate any ambient air quality standards.
- 3(b) Grading operations associated with the construction of the project would be subject to the Grading Ordinance, which requires the implementation of dust control measures. Emissions from the construction phase would be minimal, temporary and localized, resulting in pollutant emissions below the SLTs established by County air quality guidelines for determining significance<sup>1</sup>. These SLTs can be used as numeric methods to demonstrate that a project's total emissions (e.g. stationary and fugitive emissions, as well as emissions from mobile sources) would not result in a significant impact to air quality. Since SDAPCD does not have a SLT for emissions of volatile organic

<sup>1</sup> County of San Diego. 2007. *Guidelines for Determining Significance and Format and Content Requirements, Air Quality*. Available at:

<http://www.sandiegocounty.gov/content/dam/sdc/pds/ProjectPlanning/docs/AQ-Guidelines.pdf>  
and <http://www.sandiegocounty.gov/content/dam/sdc/pds/ProjectPlanning/docs/AQ-Report-Format.pdf>.



compounds (VOCs), the use of the screening level for reactive organic gases (ROG) from the South Coast Air Quality Management District (SCAQMD) for the Coachella Valley (which are more appropriate for the San Diego Air Basin) is used.

The project proposes to subdivide a 53-acre site into 4 lots approximately 10 acres in size each. Project construction would begin in the first quarter of 2018 for a duration of 7 months. Project construction would include blasting operations. It is estimated that each blast could utilize as much as 4,000 pounds of ammonium nitrate based blasting material. It is assumed that no more than 16,000 pounds of blasting material will be utilized for the entire project. Blast areas would be as large as 2,500 square feet per blast. 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. SDAPCD Rule 55 requires the implementation of dust control measures such as application of water to graded/exposed surfaces and during loading/unloading activities, wheel-washing or other means to minimize track out dust on vehicles entering/leaving the project site, stabilization of dirt piles, and hydroseeding of graded areas to minimize dust emissions from exposed surfaces, which requires the implementation of dust control measures. Emissions from the construction phase would be minimal, temporary and localized, resulting in pollutant emissions below the SLTs. According to County of San Diego Guidelines, grading activities trigger the SLTs if more than 3.5 acres is disturbed in a single day. Grading would be completed over 9 weeks with activities occurring 5 days a week. Thus, daily ground disturbance is estimated to be an average of 1.2 acres per day, which is less than the screening criterion. Construction emissions were estimated using the California Emissions Estimator Model (CalEEMod) Version 2016.3.1 and are shown in Table 1 (see Gildred Tentative Parcel Map (TPM 21176) Greenhouse Gas and Air Quality Screening Letter – San Diego County, dated August 31, 2017, for construction emissions modeling files).

**Table 1 - Gildred Construction Criteria Air Pollutant Emissions**

| <b>Year</b>  | <b>VOC</b> | <b>NO<sub>x</sub></b> | <b>CO</b>  | <b>SO<sub>x</sub></b> | <b>PM<sub>10</sub></b> | <b>PM<sub>2.5</sub></b> |
|--|------------|-----------------------|------------|-----------------------|------------------------|-------------------------|
| Construction (lb/day) 2018   | 7          | 25                    | 11         | <1                    | 18                     | 5                       |
| Blasting (lb/day) 2018   | -          | 34                    | 134        | -                     | <1                     | -                       |
| Total  | 7          | 59                    | 145        | <1                    | 18                     | 5                       |
| <b>Screening Level</b>   | <b>75</b>  | <b>250</b>            | <b>550</b> | <b>250</b>            | <b>100</b>             | <b>55</b>               |
| <b>Exceeds Levels?</b>   | No         | No                    | No         | No                    | No                     | No                      |
| VOC = volatile organic compounds; NO <sub>x</sub> = nitrogen oxides; CO = carbon monoxide;<br>SO <sub>x</sub> = oxides of sulfur; PM <sub>10</sub> = respirable particulate matter; PM <sub>2.5</sub> = fine particulate matter;<br>lbs/day = pounds per day<br>Columns may not add due to rounding. |            |                       |            |                       |                        |                         |

As shown above, construction emissions would not exceed the County's SLTs.

Operational emissions trigger the SLTs if the project develops more than 300 single-family residential units. The project is a 4-unit residential development, and would fall below the screening criterion of 300 single-family residential units.

In addition, the vehicle trips generated from the project will result in 48 average daily trips (ADTs). For 300 single-family homes, it is assumed that a San Diego Association of

Governments (SANDAG) trip generation rate of 3,000 are below the screening level criteria established from the County air quality guidelines.

- 3(c) The project would contribute particulate matter less than 10 microns (PM<sub>10</sub>), particulate matter less than 2.5 microns (PM<sub>2.5</sub>), nitrogen oxide (NO<sub>x</sub>), and VOCs emissions from construction/grading activities; however, the incremental increase would not exceed established screening thresholds (see question 3(b above)).
- 3(d) Air quality emissions associated with the project include emissions of PM<sub>10</sub>, PM<sub>2.5</sub>, NO<sub>x</sub> and VOCs from construction/grading activities, and also as the result of increase of traffic from project implementation. However, 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 SDAPCD Rule 55. Emissions from the construction phase would be minimal, localized and temporary resulting in PM<sub>10</sub>, PM<sub>2.5</sub>, NO<sub>x</sub>, and VOC emissions below the SLTs established by the County guidelines for determining significance. The proposed project would subdivide the property into four lots. The vehicle trips generated from the project would result in 48 ADTs. For 300 single-family homes, it is assumed that a San Diego Association of Governments (SANDAG) trip generation rate of 3,000 are below the screening level criteria established from the County air quality guidelines, therefore the proposed project for a four lot subdivision is below the screening level.
- 3(e) No potential sources of objectionable odors have been identified in association with the proposed project. As such, no direct or cumulative impact from odors is anticipated. Construction activities would take place during the daytime hours when, generally, most people are away from their homes (e.g., school and work), and would be temporary (i.e., 7 months). The project would not result in any new land uses typically considered to be associated with odorous emissions (e.g., refineries, coffee roasters, wastewater treatment plants, etc.). In addition, odorous emissions disperse throughout the air as distance increases from the source. Therefore, considering that construction activities would be limited to the daytime hours, when people are likely not at home, would be temporary, and would disperse with increasing distance from the source would not affect a substantial number of people. Moreover, the effects of objectionable odors are localized to the immediate surrounding area and will not contribute to a cumulatively considerable odor impact.

The project is not an agricultural, commercial, or an industrial activity that will generate objectionable odors or place sensitive receptors next to existing objectionable odors, which will affect a considerable number of persons or the public.

### **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<br>Project<br>Impact    | Impact not<br>identified by<br>GPU EIR | Substantial<br>New<br>Information |
|--|-------------------------------------|--|-----------------------------------|
| <b>4. Biological Resources – Would the Project:</b>  |                                     |  |                                   |
| 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? | <input type="checkbox"/>            | <input type="checkbox"/>               | <input type="checkbox"/>          |
| b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?   | <input checked="" type="checkbox"/> | <input type="checkbox"/>               | <input type="checkbox"/>          |
| 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?                         | <input checked="" type="checkbox"/> | <input type="checkbox"/>               | <input type="checkbox"/>          |
| 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"/>            | <input type="checkbox"/>               | <input type="checkbox"/>          |
| 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?                              | <input type="checkbox"/>            | <input type="checkbox"/>               | <input type="checkbox"/>          |

### Discussion

4(a) Biological resources on the project site were evaluated in a Biological Resources Report prepared by Gretchen Cummings of Cummings and Associates, dated August 10, 2017. The 53.1-acre project site contains disturbed coastal sage scrub (1.39 acres), coast live oak woodland (2.37 acres), mule fat scrub (1.4 acres), coastal and valley freshwater marsh habitats (0.1 acre), avocado orchards (45.68 acres), disturbed habitat (1.16 acres), and urban/developed (1.0 acre).

No sensitive plant species were identified within the project site; however, there is a high probability for ashy spike moss to occur on the project site. This species was noted just off-site to the east. This spike moss is on the County's List D plant list and has a Ranking of 4.1 according to the California Native Plant Society.

Four sensitive wildlife species were observed within the project site: Rufous-crowned sparrow, orange-throated whiptail, coastal western whiptail, and southern mule deer. As the observations of orange-throated whiptail and coastal western whiptail were of two

and three individuals respectively, it is anticipated that the project site is only occupied by a small population of each. The loss of a small population of these two reptile species is not considered a threat to the survival of the species. The mule deer tracks were observed on the edges of the marsh, which will be preserved as open space. The project is not considered a threat to the long-term survival of the species as a whole.

The proposed project will impact 0.1 acre of coast live oak woodland and 18.1 acres of avocado orchards. As considered by the GPU EIR, project impacts to sensitive habitat and/or species will be mitigated through ordinance compliance and through implementation of GPU EIR mitigation measures Bio 1.6 and 1.7. The project proposes a total of 33.9 acres of biological open space. Measures to avoid impacts to gnatcatcher, nesting birds and raptors. No brushing, clearing, rock breaking, rock blasting and/or grading will be allowed during the breeding season of gnatcatcher, nesting migratory birds, and raptors. The breeding season is defined as occurring between January 1 and August 31. The Director of PDS may waive this condition, through written concurrence with the USFW and CDFW, provided that no nesting migratory birds are present in the vicinity of brushing, clearing or grading.

- 4(b) Based on the Biological Resources report, County RPO wetlands, non-wetland waters of the U.S., coastal sage scrub, and coast live oak woodland were occur onsite. Direct and indirect impacts to sensitive natural communities identified in the RPO, NCCP, Fish and Wildlife Code, and Endangered Species Act are mitigated through avoidance measures or onsite biological open space easements.

As considered by the GPU EIR, project impacts to sensitive habitats will be mitigated through ordinance compliance and through implementation of the GPU EIR mitigation measures Bio 1.6 and 1.7. Specifically, the project will be provide a total of 33.9 acres of biological open space easement, a 50-foot buffer around RPO wetlands, establishment of 975 square feet of riparian habitat within the biological open space to mitigate for non-wetland water impacts, avoidance/preservation of 1.39 acres of coastal sage scrub habitat, and preservation of 2.07 acres of coast live oak woodland within a biological open space easement.

- 4(c) All federal wetlands onsite will be preserved within the biological open space. A total of 325 square feet of non-wetland waters of the U.S. will be impacted by the project. A U.S. Army Corps of Engineers 404 permit and Regional Water Quality Control Board 401 certificate will be required for these impacts. The project will be conditioned to provide evidence of these permits prior to construction. The project will be required to establish 975 square feet of riparian habitat within the proposed biological open space, in accordance with the Conceptual Vegetation Plan prepared for the project.
- 4(d) Based on a GIS analysis, the County's Comprehensive Matrix of Sensitive Species, site photos, a site visit by County staff, and a Biological Resources Report, it was determined that the site is not part of a regional linkage as identified on MSCP maps however the project site provides for wildlife movement. The topographical layout of the 53-acre project site forms a low point where two slopes come together that functions like a funnel for wildlife movement. The majority of the project site features an avocado orchard. To the north are undeveloped lands, and immediately to the east, adjoining the eastern property boundary, is a portion of the former Gildred Ranch which is part of the Ramona Grasslands Preserve within the Draft North County Plan area. Given the layout of the property and the adjoining North County preserve to the east, any wildlife movement is expected to occur in the northeasterly-southwesterly fashion along steep slopes. The

areas which provide functional wildlife corridor will be placed within a biological open space easement.

- 4(e) Nine acres of the project site are located within the MSCP County Subarea Plan area and 44 acres are located within the draft MSCP North County Plan area. The portion of the project site located within the County Subarea Plan is not designated as a Pre-approved Mitigation Area (PAMA) or a Biological Resource Core Area (BRCA). The portion located within the draft MSCP North County Plan area is identified as PAMA in draft North County Plan. The project proposes a total of 33.9 acres of biological open space easement; a portion of this open space easement would be located within the County Subarea Plan area with the majority located in the draft North County Plan boundaries.

The project is consistent with the MSCP, Biological Mitigation Ordinance, and Resource Protection Ordinance (RPO). In addition, the project was reviewed by the California Department of Fish and Wildlife and U.S. Fish and Wildlife Service as part of the Planning Agreement for the development of the North County Multiple Species Conservation Program at a meeting with the county on November 18, 2010.

### 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<br>Project<br>Impact    | Impact not<br>identified<br>by GPU<br>EIR | Substantial<br>New<br>Information |
|--|-------------------------------------|---|-----------------------------------|
| <b>5. Cultural Resources – Would the Project:</b>  |                                     |   |                                   |
| a) Cause a substantial adverse change in the significance of a historical resource as defined in 15064.5?    | <input type="checkbox"/>            | <input type="checkbox"/>                  | <input type="checkbox"/>          |
| b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to 15064.5? | <input checked="" type="checkbox"/> | <input type="checkbox"/>                  | <input type="checkbox"/>          |
| c) Directly or indirectly destroy a unique geologic feature?   | <input type="checkbox"/>            | <input type="checkbox"/>                  | <input type="checkbox"/>          |
| d) Directly or indirectly destroy a unique paleontological resource or site?                                 | <input type="checkbox"/>            | <input type="checkbox"/>                  | <input type="checkbox"/>          |

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

☐☐☐

### Discussion

5(a) Based on an analysis of records and prior surveys of the property (WHATFJ 07-01, HECTOR 02-194, APEC 81-25), it has been determined that there are no impacts to historical resources because they do not occur within the project site.

5(b) No archaeological resources were identified during prior archaeological surveys (WHATFJ 07-01, HECTOR 02-194, APEC 81-25) of the project site. As considered by the GPU EIR, potential impacts to cultural resources will be mitigated through compliance with the Grading Ordinance and through conformance with the County's Cultural Resource Guidelines if resources are encountered. Although no resources were identified, there is the potential for the presence of subsurface deposits. The project will be conditioned with archaeological monitoring (Cul-2.5) that includes the following requirements:

- Pre-Construction
  - Pre-construction meeting to be attended by the Project Archaeologist and Kumeyaay Native American monitor to explain the monitoring requirements.
- 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 Kumeyaay Native American monitor. Both the Project Archaeologist and Kumeyaay Native American monitor will evaluate fill soils to ensure that they are negative for cultural resources
  - If cultural resources are identified:
    - 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.
    - The Project Archaeologist in consultation with the County Archaeologist and Kumeyaay Native American shall determine the significance of discovered resources.
    - 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 or repatriation program.
    - If cultural resources are determined to be significant, a 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).

- Human Remains.
    - The Property Owner or their representative shall contact the County Coroner and the PDS Staff Archaeologist.
    - Upon identification of human remains, no further disturbance shall occur in the area of the find until the County Coroner has made the necessary findings as to origin.
    - 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 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
    - Upon completion of Rough Grading, a monitoring report shall be prepared identifying whether resources were encountered. A copy of the monitoring report shall be provided to any culturally-affiliated tribe who requests a copy.
  - Final Grading
    - A final report shall be prepared substantiating that earth-disturbing activities are completed and whether cultural resources were encountered. A copy of the final report shall be submitted to the South Coastal Information Center and any culturally-affiliated tribe who requests a copy.
  - Disposition of Cultural Material.
    - The final report shall include evidence that all prehistoric materials have been curated at a San Diego curation facility or Tribal curation facility that meets federal standards per 36 CFR Part 79, or alternatively have been repatriated to a culturally affiliated tribe.
    - The final report shall include evidence that all historic materials have been curated at a San Diego curation facility that meets federal standards per 36 CFR Part 79.
- 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 indicates that the project is located on Cretaceous Plutonic formations that have no (zero) potential to contain unique paleontological resources. No impacts are identified with paleontological resources.

- 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<br>Project<br>Impact | Impact not<br>identified by<br>GPU EIR | Substantial<br>New<br>Information |
|---|----------------------------------|--|-----------------------------------|
| <b>6. Geology and Soils</b> – 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? | <input type="checkbox"/>         | <input type="checkbox"/>               | <input type="checkbox"/>          |
| b) Result in substantial soil erosion or the loss of topsoil?   | <input type="checkbox"/>         | <input type="checkbox"/>               | <input type="checkbox"/>          |
| 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"/>         | <input type="checkbox"/>               | <input type="checkbox"/>          |
| 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?  | <input type="checkbox"/>         | <input type="checkbox"/>               | <input type="checkbox"/>          |
| 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"/>         | <input type="checkbox"/>               | <input type="checkbox"/>          |

### 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) To ensure the structural integrity of all buildings and structures, the project 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 not within a "Potential Liquefaction Area" as identified in the County Guidelines for Determining Significance for Geologic Hazards. In addition, the site is not underlain by poor artificial fill or located within a floodplain.
- 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) According to the Soil Survey of San Diego County, the soils on-site are identified as acid igneous rock land that has a soil erodibility rating of severe 1 and vista rocky coarse sandy loam that has a soil erodibility rating of moderate. However, 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 located on expansive soils as defined within Table 18-I-B of the Uniform Building Code (1994). This was confirmed by staff review of the Soil Survey for the San Diego Area, prepared by the US Department of Agriculture, Soil Conservation and Forest Service dated December 1973. The soils on-site are acid igneous rock land (AcG) and vista rocky coarse sandy loam VvE). However the project will not have any significant impacts because the project is required to comply the improvement requirements identified in the 1997 Uniform Building Code, Division III – Design Standard for Design of Slab-On-Ground Foundations to Resist the Effects of Expansive Soils and Compressible Soils, which ensure suitable structure safety in areas with expansive soils. Therefore, these soils will not create substantial risks to life or property.
- 6(e) The project proposes to discharge domestic waste to on-site wastewater systems (OSWS), also known as septic systems. The project involves four proposed on-site wastewater systems. Proposed parcel 2 will include a supplemental treatment system (STS) that is required to be approved for use (NSF Standard 40) and will be required to obtain an Annual Operating Permit from the Department of Environmental Health. Discharged wastewater must conform to the Regional Water Quality Control Board's (RWQCB) applicable standards, including the Regional Basin Plan and the California Water Code. California Water Code Section 13282 allows RWQCBs to authorize a local public agency to issue permits for OSWS "to ensure that systems are adequately designed, located, sized, spaced, constructed and maintained." The RWQCBs with jurisdiction over San Diego County have authorized the County of San Diego, Department of Environmental Health (DEH) to issue certain OSWS permits throughout the County and within the incorporated cities. DEH has reviewed the OSWS lay-out for the project pursuant to DEH, Land and Water Quality Division's, "On-site Wastewater Systems: Permitting Process and Design Criteria." DEH approved the project's OSWS on December 8, 2015. Therefore, the project site has soils capable of adequately

supporting the use of septic tanks or alternative wastewater disposal systems as determined by the authorized, local public agency. In addition, the project will comply with the San Diego County Code of Regulatory Ordinances, Title 6, Div. 8, Chap. 3, Septic Tanks and Seepage Pits.

### 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<br>Project<br>Impact | Impact not<br>identified by<br>GPU EIR | Substantial<br>New<br>Information |
|--|----------------------------------|--|-----------------------------------|
| <b>7. Greenhouse Gas Emissions – Would the Project:</b>  |                                  |  |                                   |
| a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?      | <input type="checkbox"/>         | <input type="checkbox"/>               | <input type="checkbox"/>          |
| b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases? | <input type="checkbox"/>         | <input type="checkbox"/>               | <input type="checkbox"/>          |

### Discussion

7(a) The project would generate greenhouse gas (GHG) emissions through construction activities, blasting operations, vehicle trips, and residential fuel combustion. The annual 900 metric tons of carbon dioxide equivalent (MTCO<sub>2</sub>e) screening level which is referenced in the California Air Pollution Control Officers Association (CAPCOA) white paper is used as a conservative screening level for determining which projects require further analysis and identification of project design features or potential mitigation measures with regard to GHG emissions. However, the project falls below the screening level that were developed to identify project types and sizes that would have less than cumulatively considerable GHG emissions (i.e., the project would result in less than 50 single-family residential units).

The screening criteria is based on various land use densities and project types. Projects that meet or fall below the screening criteria are expected to result in 900 MT per year of GHG emissions or less and would not require additional analysis.

Construction emissions were estimated using CalEEMod. Based on the emissions modeling conducted, the project estimated total construction-related GHG emissions are estimated to be 116 MTCO<sub>2</sub>e per year (see Gildred Tentative Parcel Map (TPM 21176) Greenhouse Gas and Air Quality Screening Letter – San Diego County, dated August 31, 2017, for construction emissions modeling files).

The project proposes the development of 4 single-family residential units, and therefore would fall below the screening criterion of 50 units. For projects of this size, it is presumed that the construction and operational GHG emissions would not exceed 900 MTCO<sub>2</sub>e per year, and there would be a less-than cumulatively considerable impact.

- 7(b) As described above, the project would not result in a cumulatively considerable contribution to global climate change. As such, the project would be consistent with County goals and policies included in the County General Plan that address GHG reductions. Therefore, the project would be consistent with emissions reduction targets of Assembly Bill 32, the Global Warming Solutions Act. Thus, the project would not conflict with any applicable plan, policy or regulation adopted for the purpose of reducing emissions of greenhouse gas emissions.

### Conclusion

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

|   | Significant<br>Project<br>Impact | Impact not<br>identified by<br>GPU EIR | Substantial<br>New<br>Information |
|---|----------------------------------|--|-----------------------------------|
| <b>8. Hazards and Hazardous Materials – Would the Project:</b>  |                                  |  |                                   |
| 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?                    | <input type="checkbox"/>         | <input type="checkbox"/>               | <input type="checkbox"/>          |
| b) 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"/>         | <input type="checkbox"/>               | <input type="checkbox"/>          |
| 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? | <input type="checkbox"/>         | <input type="checkbox"/>               | <input type="checkbox"/>          |
| 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?  | <input type="checkbox"/>         | <input type="checkbox"/>               | <input type="checkbox"/>          |
| 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?   | <input type="checkbox"/>         | <input type="checkbox"/>               | <input type="checkbox"/>          |

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 proposes a residential subdivision. 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. In addition, 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.

A Limited Phase II Environmental Site Assessment dated November 15, 2010 was completed for the subject property. The focus of the Limited Phase II was based on the historic agricultural uses of the site. Current evidence of the agricultural use is present in the form of avocado orchards. The Phase II assessment included field sampling of surficial soils from eight locations on the property, at depths of six to twelve inches below ground surface (bgs) on the property. The locations of the soil sample borings were chosen to represent the proposed building lots. All soil samples were analyzed for Organochlorine Pesticides.

Chlorinated pesticides were not detected above the respective laboratory detection limit on any of the soil samples. The one soil sample submitted for evaluation of chlorinated herbicides posted a concentration of 3,500 micrograms per kilogram (ug/kg) of the compound MCPA (2-methyl-4-chlorophenoxyacetic acid) a phenoxy acid herbicide. All other chlorinated herbicide analytes posted levels below their respective laboratory detection limits. The United States Environmental Protection Agency (USEPA) posts screening levels of compounds in soil for designated residential land use in their Preliminary Remediation Goals (PRG Table). The PRG value for MCPA in residential soil is 310,000 ug/kg. This concentration, if not exceeded, will not cause adverse health effects to human receptors via the three exposure pathways (inhalation, ingestion, and dermal contact). The reported concentration (3,500 ug/kg) of MCPA is 2 orders of magnitude, or 88x lower, than the reported PRG value for the compound.

The Phase II findings concluded that there is no human health exposure concern on the subject property and no further hazardous materials investigation is required.

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.

The project site contained the potential for contamination from historic agriculture. Current evidence of the agricultural use is present in the form of avocado orchards. As discussed under item 8 (a), a Limited Phase II Environmental Site Assessment dated November 15, 2010 was completed for the subject property. The Phase II assessment included field sampling of surficial soils from eight locations on the property. All samples reported no concentrations above the Preliminary Remediation Goals established for residential properties by the United States Environmental Protection Agency (EPA). The Phase II findings concluded that there is no human health exposure concern on the subject property and no further hazardous materials investigation is required.

Therefore, since the property shows no evidence of contamination from historic uses, the project will not result in any potentially significant impacts related to the release of hazardous substances onsite.

- 8(d) The subject property contains patches of land within the FAA Height Notification Surface due to its topography and proximity to the Ramona Airport. However, the proposed project would not result in hazards to airport safety or surrounding land uses because the project would not involve any of the following: distracting visual hazards including but not limited to distracting lights, glare, sources of smoke or other obstacles or an electronic hazard that would interfere with aircraft instruments or radio communications; 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; or 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).
- 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.

- 6(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 will comply with the regulations relating to emergency access, water supply, and defensible space specified in the Consolidated Fire Code, as described in the approved Fire Protection Plan prepared for the project by David C. Bacon, (December 1, 2010). Also, a Fire Service Availability Letter dated October 26, 2015 has been received from the Ramona Fire Protection District which indicates the expected emergency travel time to the project site to be 12.4 minutes which is within the 20 maximum travel time allowed by the County Public Facilities Element.
- 6(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<br>Project<br>Impact | Impact not<br>identified by<br>GPU EIR | Substantial<br>New<br>Information |
|---|----------------------------------|--|-----------------------------------|
| <b>9. Hydrology and Water Quality – Would the Project:</b>  |                                  |  |                                   |
| a) Violate any waste discharge requirements?  | <input type="checkbox"/>         | <input type="checkbox"/>               | <input type="checkbox"/>          |
| 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?  | <input type="checkbox"/>         | <input type="checkbox"/>               | <input type="checkbox"/>          |
| 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?   | <input type="checkbox"/>         | <input type="checkbox"/>               | <input type="checkbox"/>          |
| 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)? | <input type="checkbox"/>         | <input type="checkbox"/>               | <input type="checkbox"/>          |
| e) Substantially alter the existing drainage pattern of the   | <input type="checkbox"/>         | <input type="checkbox"/>               | <input type="checkbox"/>          |

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) A Drainage Study (Landmark Consulting, January 25, 2017) and a Stormwater Quality Management Plan (Landmark Engineering, July 26, 2017) have been prepared for the project.

The project will require a NPDES General Permit for Discharges of Storm Water Associated with Construction Activities. The project applicant has provided a Stormwater Quality Management Plan (SWQMP) 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 Runoff Management Program (JRMP) and BMP Design Manual.

9(b) The project site lies in the 905.32/ Las Lomas Muertas sub-basin, within the San Dieguito hydrologic unit. According to the Clean Water Act Section 303(d) list, a portion

of this watershed is impaired for pollutants/ stressors. Constituents of concern in the Lake Hodges and San Dieguito River include Enterococcus, Manganese, Mercury, Nitrogen, Phosphorus, turbidity, PH and heavy metals. The project could contribute to release of these pollutants; however, the project will comply with the WPO and implement site design measures, source control BMPs, and structural 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 will obtain its water supply from the Ramona Municipal Water District that obtains water from surface reservoirs or other imported sources. The project will not use any groundwater. In addition, the project does not involve operations that would interfere substantially with groundwater recharge.
- 9(e) As outlined in the project's SWQMP, the project will implement source control and structural BMPs to reduce potential pollutants, including sediment from erosion or siltation, to the maximum extent practicable from entering storm water runoff.
- 9(f) An existing stream parallels Highland Valley Road. It should be noted that the USGS blue-line stream mapping for the project site is not accurate. The stream flows through the mapped RPO wetland on the west side of the property and does not flow north through the northern property boundary, as depicted on the USGS blue-line stream mapping. The mapping in the Biological Resources Report for the project reflects the observed on site conditions.

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 Landmark Consulting (David H. Yeh) on January 25, 2017, drainage will be conveyed to either natural drainage channels or approved drainage facilities.

- 9(g) The project results in very minimal increase in runoff volume in one of the sub-basins; however the Drainage Study prepared for the project thoroughly examined the capacity of the downstream drainage facility to ensure no increase to the outlet velocity and water surface elevation is caused by this minimal increase. Additionally there is a decrease in runoff volume in the remainder two sub-basins which indicate that the project overall has no impacts to the downstream drainage facilities.
- 9(h) The project has the potential to generate pollutants; however, site design measures, source control BMPs, and structural BMPs will be employed such that potential pollutants will be reduced to the maximum extent practicable.
- 9(i) No FEMA mapped floodplains, County-mapped floodplains or drainages with a watershed greater than 25 acres were identified on the project site or off-site improvement locations. The limits of existing wetland and adequate buffers have been clearly shown and identified on the Tentative Parcel Map.
- 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<br>Project<br>Impact | Impact not<br>identified by<br>GPU EIR | Substantial<br>New<br>Information |
|---|----------------------------------|--|-----------------------------------|
| <b>10. Land Use and Planning – Would the Project:</b>   |                                  |  |                                   |
| a) Physically divide an established community?  | <input type="checkbox"/>         | <input type="checkbox"/>               | <input type="checkbox"/>          |
| 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? | <input type="checkbox"/>         | <input type="checkbox"/>               | <input type="checkbox"/>          |

### 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<br>Project<br>Impact | Impact not<br>identified by<br>GPU EIR | Substantial<br>New<br>Information |
|--|----------------------------------|--|-----------------------------------|
| <b>11. Mineral Resources – Would the Project:</b>  |                                  |  |                                   |
| a) Result in the loss of availability of a known mineral resource that would be of value to the region and the | <input type="checkbox"/>         | <input type="checkbox"/>               | <input type="checkbox"/>          |

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 Aggregate Materials in the Western San Diego Production-Consumption Region, 1997 (MRZ-3). However, the project site is surrounded by developed land uses including residential uses, which are incompatible to future extraction of mineral resources on the project site. A future mining operation at the project site would likely create a significant impact to neighboring properties for issues such as noise, air quality, traffic, and possibly other impacts. Therefore, the project will not result in the loss of a known mineral resource because the resource has already been lost due to incompatible land uses.

11(b) The project site is not located in an Extractive Use Zone (S-82), nor does it have an Impact Sensitive Land Use Designation (24) with an Extractive Land Use Overlay (25).

## 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<br>Project<br>Impact    | Impact not<br>identified by GPU<br>EIR | Substantial<br>New<br>Information |
|---|-------------------------------------|--|-----------------------------------|
| <b>12. Noise</b> – 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?   | <input checked="" type="checkbox"/> | <input type="checkbox"/>               | <input type="checkbox"/>          |
| b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?   | <input type="checkbox"/>            | <input type="checkbox"/>               | <input type="checkbox"/>          |
| c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?  | <input type="checkbox"/>            | <input type="checkbox"/>               | <input type="checkbox"/>          |
| d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?  | <input checked="" type="checkbox"/> | <input type="checkbox"/>               | <input type="checkbox"/>          |
| 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 | <input type="checkbox"/>            | <input type="checkbox"/>               | <input type="checkbox"/>          |

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) A Noise Study dated July 29, 2017 was prepared by Ldn Consulting for the project. The area surrounding the project site consists of primarily of single family residential and agricultural uses. 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 – The project is subject to the County Noise Element which requires an exterior noise level threshold of 60 dBA CNEL for single family residences. Based on the Noise Study, the proposed residential subdivision would not be exposed to levels exceeding the 60 dBA CNEL County Noise Element threshold requirement for proposed single family lots. Due to the low level ADT from Highland Valley Road and Highland Trails Drive, the project site would be exposed to a future traffic noise level as high as 55 dBA CNEL on Pad 4. Based on noise attenuation by distance and existing site features, future traffic noise levels would not exceed the 60 dBA CNEL requirement at the ground level and second story level of the proposed residential lots. Additionally, the project related traffic contributions to nearby roadways would not create any off-site direct and/or cumulative noise impacts. The project conforms with the General Plan Noise Element.

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 does not involve any permanent noise producing equipment that would exceed applicable noise levels at the adjoining property line.

Noise Ordinance – Section 36-409 & 36-310:

The project is also subject to the County Noise Ordinance which governs the amount of noise during the temporary construction equipment operations.

Substantial noise generating equipment and operations are comprised of rock drilling, blasting and rock breaking. Rock drilling operations must be setback a minimum of 160 feet from any occupied noise sensitive land use. The project would be subject to a noise mitigation plan which may include temporary barriers and/or other noise reducing options if rock drilling is staged within the 160 foot setback requirement. Rock breaking operations must be setback a minimum of 180 feet from any occupied noise sensitive land use. The project would be subject to a noise mitigation plan which may include temporary barriers and/or other noise reducing options if rock breaking is staged within this 180 foot setback.

General construction equipment operations were also assessed. Grading operations comprised of dozers, a compactor and water truck are not anticipated to exceed County noise standards because setbacks to occupied neighboring property lines are over 100 feet. Therefore, with noises measures incorporated for the rock drilling and blasting, the project subdivision is consistent with the County Noise Element and County Noise Ordinance.

- 12(b) The project proposes residences where low ambient vibration is essential for interior operation and/or sleeping conditions. However, the facilities are typically setback more than 50 feet from any County Mobility Element (ME) roadway using rubber-tired vehicles with projected groundborne noise or vibration contours of 38 VdB or less; any property line for parcels zoned industrial or extractive use; or any permitted extractive uses. A setback of 50 feet from the roadway centerline for heavy-duty truck activities would insure that these proposed uses or operations do not have any chance of being impacted significantly by groundborne vibration or groundborne noise levels (Harris, Miller and Hanson Inc., Transit Noise and Vibration Impact Assessment 1995, Rudy Hendriks, Transportation Related Earthborne Vibrations 2002). This setback insures that this project site will not be affected by any future projects that may support sources of groundborne vibration or groundborne noise related to the adjacent roadways.

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 and impact vibration sensitive uses in the surrounding area.

Therefore, the project will not expose persons to or generate excessive groundborne vibration or groundborne noise levels on a project or cumulative level.

- 12(c) As indicated in the response listed under Section 12(a), the residential subdivision 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 not expected to expose existing or planned noise sensitive areas to direct and cumulative noise impacts over existing ambient noise levels.

- 12(d) As discussed under 12(a) above, the project is subject to the County Noise Ordinance which governs the amount of noise during the temporary construction equipment operations. Substantial noise generating equipment and operations are comprised of rock drilling, blasting and rock breaking. Construction of the project would involve rock drilling, breaking and blasting operations. Rock drilling operations must be setback a minimum of 160 feet from any occupied noise sensitive land use. The project would be subject to a noise mitigation plan which may include temporary barriers and/or other noise reducing options if rock drilling is staged within the 160 foot setback requirement. Rock breaking operations must be setback a minimum of 180 feet from any occupied noise sensitive land use. The project would be subject to a noise mitigation plan which may include temporary barriers and/or other noise reducing options if rock breaking is staged within this 180 foot setback.

General construction equipment operations were also assessed. Grading operations comprised of dozers, a compactor and water truck are not anticipated to exceed County noise standards because setbacks to occupied neighboring property lines are over 100 feet. Therefore, with noises measures incorporated for the rock drilling, breaking and blasting, the project is consistent with the County Noise Element and County Noise Ordinance.

- 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 with the incorporation of noise measures pursuant to Mitigation Measures Noi-1.1 and Noi-4.2; therefore, the project would not result in an impact which was not adequately evaluated by the GPU EIR.

|   | Significant<br>Project<br>Impact | Impact not<br>identified by<br>GPU EIR | Substantial<br>New<br>Information |
|---|----------------------------------|--|-----------------------------------|
| <b>13. Population and Housing</b> – 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"/>         | <input type="checkbox"/>               | <input type="checkbox"/>          |
| b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?   | <input type="checkbox"/>         | <input type="checkbox"/>               | <input type="checkbox"/>          |
| c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?   | <input type="checkbox"/>         | <input type="checkbox"/>               | <input type="checkbox"/>          |

**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.

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

13(c) The proposed project will not displace a substantial number of people since no residences are currently located on the project site.

**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<br>Project<br>Impact | Impact not<br>identified by<br>GPU EIR | Substantial<br>New<br>Information |
|--|----------------------------------|--|-----------------------------------|
| <b>14. Public Services</b> – 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? | <input type="checkbox"/>         | <input type="checkbox"/>               | <input type="checkbox"/>          |

**Discussion**

14(a) Based on the project's service availability forms, the project 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<br>Project<br>Impact | Impact not<br>identified by<br>GPU EIR | Substantial<br>New<br>Information |
|--|----------------------------------|--|-----------------------------------|
| <b>15. Recreation – Would the Project:</b>   |                                  |  |                                   |
| a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated? | <input type="checkbox"/>         | <input type="checkbox"/>               | <input type="checkbox"/>          |
| b) Does the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?                       | <input type="checkbox"/>         | <input type="checkbox"/>               | <input type="checkbox"/>          |

**Discussion**

15(a) The project would incrementally increase the use of existing parks and other recreational facilities; however, the project will be required to pay fees or dedicate land for local parks pursuant to the Park Land Dedication Ordinance.

15(b) The project includes 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<br>Project<br>Impact | Impact not<br>identified by<br>GPU EIR | Substantial<br>New<br>Information |
|--|----------------------------------|--|-----------------------------------|
| <b>16. Transportation and Traffic – Would the Project:</b>   |                                  |  |                                   |
| 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 | <input type="checkbox"/>         | <input type="checkbox"/>               | <input type="checkbox"/>          |

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? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 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?  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| d) 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"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| e) Result in inadequate emergency access?  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 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?   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

### Discussion

- 16(a) The project will result in an additional 48 ADTs. However, the project will not conflict with any established performance measures because the project trips do not exceed the thresholds established by County guidelines. 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 additional 48 ADTs from the project do 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. However, the subject property contains patches of land within the FAA Height Notification Surface due to its topography and proximity to the Ramona Airport. The main compatibility concerns for the protection of airport airspace are related to airspace obstructions (building height, antennas, etc.) and hazards to flight (wildlife attractants, distracting lighting or glare, etc.). The project would not result in a change in air traffic patterns because, the project would not exceed the Federal Aviation Administration Regulations, Part 77 – Objects Affecting Navigable Airspace (FAAR Part 77) criteria related to airspace obstructions. Therefore, the proposed project would not have a significant impact on air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks. Refer to section VIII.d Hazards and Hazardous Materials for more information on the project's compliance with FAAR Part 7716(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) A Fire Protection Plan dated December 1, 2010 and Addendum dated May 30, has been prepared by Firewise 2000 Inc., Ron Woychak. The Ramona Fire Protection District and the San Diego County Fire Authority have reviewed the project and its Fire Protection Plan and have determined that there is adequate emergency fire access.
- 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<br>Project<br>Impact | Impact not<br>identified by<br>GPU EIR | Substantial<br>New<br>Information |
|--|----------------------------------|--|-----------------------------------|
| <b>17. Utilities and Service Systems – Would the Project:</b>  |                                  |  |                                   |
| a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?  | <input type="checkbox"/>         | <input type="checkbox"/>               | <input type="checkbox"/>          |
| 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?                             | <input type="checkbox"/>         | <input type="checkbox"/>               | <input type="checkbox"/>          |
| 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?                                      | <input type="checkbox"/>         | <input type="checkbox"/>               | <input type="checkbox"/>          |
| d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?   | <input type="checkbox"/>         | <input type="checkbox"/>               | <input type="checkbox"/>          |
| 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? | <input type="checkbox"/>         | <input type="checkbox"/>               | <input type="checkbox"/>          |
| f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?   | <input type="checkbox"/>         | <input type="checkbox"/>               | <input type="checkbox"/>          |
| g) Comply with federal, state, and local statutes and regulations related to solid waste?  | <input type="checkbox"/>         | <input type="checkbox"/>               | <input type="checkbox"/>          |

### Discussion



- 17(a) The project proposes to discharge domestic waste to on-site wastewater systems (OSWS), also known as septic systems. The project involves four proposed on-site wastewater systems. Proposed parcel 2 will include a supplemental treatment system (STS) with that is required to be approved for use (NSF Standard 40) and will be required to obtain an Annual Operating Permit from the Department of Environmental Health. Discharged wastewater must conform to the Regional Water Quality Control Board's (RWQCB) applicable standards, including the Regional Basin Plan and the California Water Code. California Water Code Section 13282 allows RWQCBs to authorize a local public agency to issue permits for OSWS "to ensure that systems are adequately designed, located, sized, spaced, constructed and maintained." The RWQCBs with jurisdiction over San Diego County have authorized the County of San Diego, Department of Environmental Health (DEH) to issue certain OSWS permits throughout the County and within the incorporated cities. DEH has reviewed the OSWS lay-out for the project pursuant to DEH, Land and Water Quality Division's, "On-site Wastewater Systems: Permitting Process and Design Criteria." DEH approved the project's OSWS on December 8, 2015. Therefore, the project has soils capable of adequately supporting the use of septic tanks or alternative wastewater disposal systems as determined by the authorized, local public agency. In addition, the project will comply with the San Diego County Code of Regulatory Ordinances, Title 6, Div. 8, Chap. 3, Septic Tanks and Seepage Pits.
- 17(b) The project involves new water pipeline extensions. However, these extensions will not result in additional adverse physical effects beyond those already identified in other sections of this environmental analysis.
- 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) A Service Availability Letter from the Ramona Municipal Water District has been provided which indicates that there is adequate water to serve the project.
- 17(e) The project would rely on a private septic system for each parcel. Therefore, a Service Availability Letter from a sewer district is not required.
- 17(f) All solid waste facilities, including landfills require solid waste facility permits to operate. There are five, permitted active landfills in San Diego County with remaining capacity to adequately serve the project.
- 17(g) The project will deposit all solid waste at a permitted solid waste facility.

### **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:

Cummings and Associates, Gretchen Cummings, August 10, 2017, Full Biological Resources Report, Over APN 276-100-400-00, County of San Diego, California, TPM 21176; County Log No. 3910-10-09-003 (ER)

Ldn Consulting, Jeremy Loudon, July 29, 2017, Noise Study Gildred Subdivision, TPM 21176 , APN 276-100-40

FireWise 2000, Inc., David C Bacon, President, December 1, 2010, Fire Protection Plan, and Addendum dated May 30, 2017, Gildred Project Highland Valley Road, TM 21176 Environmental Log # 3910-10-09-003

County of San Diego, Dennis Campbell, County Agricultural Resources Specialist, May 27, 2010, Agricultural Resources Local Agricultural Resources Assessment (LARA) model results, for highland trails, Ramona, San Diego County, California, 3200-21176 (TPM)

Vinje & Middleton engineering, Inc., Bradley W. Crawshaw Jr, Professional Geologist, November 15, 2010, Limited Phase II Environmental Site Assessment for Gildred Tentative Map 3200-21176, Assessor's Parcel No. 276-100-40

Ldn Consulting, Jeremy Loudon, August 31, 2017, Gildred Tentative Parcel Map (TPM 21176) Greenhouse Gas and Air Quality Screening Letter – San Diego County

Landmark Consulting, David Yeh, July 26, 2017, County of San Diego, Priority Development Project (PDP), Gildred TPM, PDS2010-3200-21176, Highland Valley Road, Ramona, CA 92027

Landmark Consulting, David Yeh, July 19, 2017, Hydromodification Management Plan (HMP) for Gildred TPM, San Diego County

Landmark Consulting, David Yeh, January 25, 2017, Preliminary Drainage Study for Gildred TPM, San Diego County

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](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](http://www.sdcounty.ca.gov/pds/gpupdate/GPU_FEIR_Summary_15183_Reference.pdf)