



# County of San Diego

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**MARK WARDLAW**  
DIRECTOR

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

**Date:** August 31, 2017  
**Project Title:** Shady Oak  
**Record ID:** PDS2016-REZ-16-005; PDS2016-TM-5614; PDS2016-STP-16-019  
**LOG NO.** PDS2016-ER-16-08-008  
**Planning Area:** Valley Center  
**GP Designation:** Village Core Mixed Use  
**Density:** 30 dwelling units per acre (du/ac)  
**Zoning:** Holding Zone  
**Min. Lot Size:** One Acre  
**Special Area Reg.:** B-Designator (Site Plan Review)  
**Lot Size:** 5.2 acres  
**Applicant:** Kerry Garza, President, Touchstone Communities, (858) 248-4951  
**Staff Contact:** Benjamin Mills, Project Manager, Planning & Development Services  
(858) 495-5234, Benjamin.Mills@sdcounty.ca.gov

### **Project Description**

#### Location

The proposed project is located in the unincorporated portion of northern San Diego County, in the South Village of the Valley Center community, west of Valley Center Road and south of Mirar De Valle Road. The site is one legal lot, with the following Assessor's Parcel Number (APN): 186-270-01.

#### Site Description

The 5.2-acre project site is located in the valley bottom in Valley Center. The site has an elevational range of approximately 17 feet. On-site elevations generally range from approximately 1,301 feet above mean sea level (amsl) running northeast to southwest and 1,318 feet amsl in the southwestern corner of the site. The project site has historically been used for agriculture and residential purposes.

#### Discretionary Actions

The project consists of the following discretionary actions: Rezone (REZ), Tentative Map (TM), and Site Plan (STP).

The REZ would amend the S-90 Holding Zone Use Regulation to Rural Residential (RR), the setback designator from the B-Designator to the V-Designator, and the minimum lot size from one acre to 2600 square feet. As described in Section 2900 of the County of San Diego Zoning Ordinance, it is intended that the Holding Area Use Regulations be replaced by other use regulations when the following occurs: adequate services and facilities are available, the proposed use regulation would not preclude any proposed or adopted projects and/or there is adequate geographic, economic and demographic data available. Adequate services are available to serve the proposed project. Service Availability Forms

have been provided indicating adequate service from the Valley Center Municipal Water District, Valley Center Fire Protection District, and the Valley Center-Pauma Unified School District; the proposed Variable Residential Use Regulation would not preclude any proposed or adopted projects; and adequate data is available to evaluate the proposed Zoning Amendment.

The TM would divide 5.2-acres into 47 single-family residential lots, pathways, trails, roadways, and retention basins.

The STP guides the project's architecture, landscaping, and design features to ensure consistency with the Valley Center Design Guidelines and defines the lot setbacks.

#### Project Description

A total of 47 single-family two-story homes would be constructed with multiple architectural treatment options and floor plans. Lot sizes would vary among the homes with a range between 2,620 square feet to 4,328 square feet. Landscaping will be planted along the perimeter of the project. Homes will be provided access from proposed private alley roads that would connect to a main proposed private road running east to west that bisects the site. Another private road running north to south would connect the project to Mirar De Valle, which is a public road. The project would improve Mirar De Valle Road to public road standards. The proposed project would also construct decomposed granite pathways, which would connect the private roads to Mirar De Valle Road.

Secondary access in accordance with the County Consolidated Fire Code will be provided by one of two options, which will be made conditions of project approval:

- 1) If the in-process Park Circle project, located to the north of the project site, is approved and Park Circle's proposed public road is constructed; the Shady Oak project would not need to construct a road for secondary access.
- 2) If Park Circle's proposed public road is not constructed, Shady Oak would be required to construct a road for secondary access connecting to Valley Center road. The secondary access roadway would be improved to public road standards.

Water and sewer would be provided by Valley Center Municipal Water District. Earthwork is anticipated to consist of 8,000 cubic yards of cut and fill. The project site is subject to the Village General Plan Regional Category, Land Use Designations Village Core Mixed Use. Existing zoning for the site is Holding Zone (S90).

#### **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. CEQA Guidelines 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 Program EIR was certified in conjunction with adoption of the GPU on August 3, 2011. The GPU Program 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 Park Circle project is consistent with the analysis performed for the GPU Program EIR. Further, the GPU Program EIR adequately anticipated and described the impacts of the proposed project, identified applicable mitigation measures necessary to reduce project specific impacts, and the project implements these mitigation measures. See [http://www.sdcounty.ca.gov/PDS/gpupdate/docs/BOS\\_Aug2011/EIR/FEIR\\_7.00\\_Mitigation\\_Measures\\_2011.pdf](http://www.sdcounty.ca.gov/PDS/gpupdate/docs/BOS_Aug2011/EIR/FEIR_7.00_Mitigation_Measures_2011.pdf) for complete list of GPU Mitigation Measures.

A comprehensive environmental evaluation has been completed for the project as documented in the attached §15183 Exemption Checklist. This evaluation concludes that the project qualifies for an exemption from additional environmental review because it is consistent with the development density and use characteristics established by the County of San Diego General Plan, as analyzed by the San Diego County GPU 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 74-acre property into 332 residential lots, which is consistent with the Village Core, Village Residential and Rural Land development densities established by the General Plan and the certified GPU Program EIR.
2. **There are no project specific effects which are peculiar to the project or its site, and which the GPU Program 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, residential and agricultural 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 Exemption Checklist below, all project impacts were adequately analyzed by the GPU Program EIR. The project could result in potentially significant impacts to agricultural resources, biological resources, cultural resources, hydrology and water quality, public services, recreation, noise and traffic. However, applicable mitigation measures specified within the GPU Program EIR have been made conditions of approval for this project and are referenced within the attached Environmental Checklist, where appropriate.

**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 Program EIR and would represent a small part of the growth that was forecast for build-out of the General Plan. The GPU Program 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 or that would result in any new significant impacts.

**4. There is no substantial new information which results in more severe impacts than anticipated by the GPU Program 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 Program EIR.**

As explained in the 15183 Exemption Checklist below, the project will undertake feasible mitigation measures specified in the GPU Program EIR. These GPU Program EIR mitigation measures will be implemented through project design, compliance with regulations and ordinances, or through the project's conditions of approval.

**August 31, 2017**

Signature

Date

**Benjamin Mills**

Printed Name

**Project Manager**

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 Program 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 Program 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 Program 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 Program EIR.

A summary of staff’s analysis of each potential environmental effect is provided below the checklist for each subject area. Attachment 1 contains a list of GPU Program EIR mitigation measures.

	Significant Project Impact	Impact not Identified by GPU EIR	Substantial New 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) Scenic vistas are available from public hiking trails within the Daley Ranch Conservation Area, located approximately 2.5 miles southwest of the project site. These views may encompass portions of the project site, as well as off-site elements such as surrounding hillsides, and neighboring and intervening development. However, open views from Daley Ranch would only be available from limited locations, with the majority of trail views toward the project site being screened by larger topographic forms. The proposed project will not have a substantial adverse effect on a scenic vista for the following reasons: the relatively small size of the proposed project, the project is consistent with existing visual and community character of the Valley Center Community Plan Area, and design of individual structures within the project would not be notably different from structural design seen elsewhere in the immediate vicinity; the relative distance of the project site from the trails; the location of the property downslope, which serves to foreshorten proposed built structures; and the extremely limited nature of views to the property from identified trails within Daley Ranch.
- 1(b) The project site cannot be seen within a State-designated scenic highway. The closest County-designated scenic highways to the project site are segments of Lilac Road and Valley Center Road where they intersect with State Route 76 (both approximately 0.27-mile north from the site at their closest proximity). The project site is not visible from either of these facilities due to the winding nature of the roads; as well as intervening landscaping structures and topography, therefore, the project would not significantly impact a scenic resource.
- 1(c) The project would be consistent with existing visual and community character of the Valley Center Community Plan Area. The project is located in the Valley Center South Village in an area generally characterized by residential, commercial and agricultural uses. The Village Core Area of the Valley Center South Village is anticipated to contain mixed-use residential and commercial development. The inclusion of residential lots from the proposed Shady Oak project would not substantially degrade the visual quality of the site or its surroundings. Although the visual character of the site would change from existing conditions, it would not change the relative scale of development planned in the area, as the project would be consistent with the Village designation applied to the site within the 2011 GPU. The project provides detailed site design and layout,

architecture criteria, and guidance related to lighting, walls, fences and landscape palettes; design of individual structures within the project would not be notably different from structural design seen elsewhere in the immediate vicinity. In addition, the project has incorporated a number of design measures to ensure that the off-site viewer's experience remains positive in terms of visual diversity and consistency with the existing and planned character of the area. These measures include varied (i.e., not repetitive and monotonous) structure styles that incorporate rural design elements, and incorporation of open space (park areas, landscape/greensward and retained. Further, the project would be consistent with applicable goals and policies related to aesthetics contained within the County General Plan, the Valley Center Community Plan and the Valley Center Design Guidelines. Based on the aforementioned, development of the proposed project would not substantially degrade the existing visual character or quality of the site and its surroundings.

- 1(d) Residential lighting would be required to conform with the County's Light Pollution Code and Zoning Ordinance to prevent spillover onto adjacent properties and to minimize impacts to dark skies. Therefore, the proposed project would not create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area.

## Conclusion

With incorporation of mitigation measures, the GPU EIR concluded less than significant impacts associated with scenic vistas and scenic resources, but significant and unavoidable impacts associated with visual character and light and glare. As discussed above, the project would result in less than significant impacts to aesthetics; therefore, the project would not result in an impact which was not adequately evaluated by the GPU EIR.

	Significant Project Impact	Impact not Identified by GPU EIR	Substantial New 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,	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

which, due to their location or nature, could result in conversion of Important Farmland or other agricultural resources, to non-agricultural use?

### Discussion

- 2(a) As described in the Agricultural Resources Report prepared by Recon Environmental, INC., dated December 2016 (Appendix A), by 1967, the historical agricultural uses on-site were replaced with a single-family residence occupying a portion of the site and the remainder being periodically mowed. The biology report for the project states that the majority of the site is mapped as non-native grassland and disturbed. The site has not been used for any commercial agricultural use within the last 50 years; therefore, as defined by the County of San Diego's Guidelines for Determining Significance for Agricultural Resources, the project site does not meet any of the three criteria to be considered an agricultural resource. Due to the lack of agricultural resources on the project site, a Local Area Resources Assessment (LARA) model was not completed for the site. Since no resources are present, the project would have no direct impacts to agricultural resources and no mitigation would be required.
- 2(b) The project site is not located within or adjacent to a Williamson Act contract or agriculturally zoned land.
- 2(c) There are no timberland production zones on or near the property.
- 2(d) The project site is not located near any forest lands.
- 2(e) The conversion of the subject property to residential uses would be limited to the project footprint and would not result in conversion of off-site agricultural resources to non-agricultural resources.

### Conclusion

The GPU EIR concluded less than significant impacts associated with land use conflicts but significant and unavoidable impacts associated with direct and indirect conversion of agricultural resources. As discussed above, the project would result in less than significant impacts to Agriculture and forestry resources; therefore, the project would not result in an impact which was not adequately evaluated by the GPU EIR

	Significant Project Impact	Impact not Identified by GPU EIR	Substantial New 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-	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>



attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

d) Expose sensitive receptors to substantial pollutant concentrations?

☐☐☐

e) Create objectionable odors affecting a substantial number of people?

☐☐☐

### Discussion

3(a) An Air Quality Assessment was prepared by Eliar Associates, Inc. Acoustical & Environmental Consulting on July 29, 2016 (Appendix B). The project proposes development that was anticipated and considered by the San Diego Association of Governments (SANDAG) growth projections used in development of the Regional Air Quality Strategy (RAQS) and State Implementation Plan (SIP). As such, the project would not conflict with either the RAQS or the SIP. In addition, the operational emissions from the project are below screening levels, 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 County 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 screening level criteria established by County air quality guidelines for determining significance.

Operational emissions associated with the project are below the County's screening-level thresholds for all pollutants. Because vehicular emissions decrease over time with phase-out of older vehicles and implementation of increasingly stringent emission controls, future emissions would decrease. Projects involving traffic impacts may result in the formation of locally high concentrations of carbon monoxide (CO), known as CO "hot spots." To verify that the project would not cause or contribute to a violation of the CO standard, a screening evaluation of the potential for CO "hot spots" was conducted. The Traffic Impact Study (Darnell and Associates 2017) evaluated whether or not there would be a decrease in the level of service at the roadways and/or intersections affected by the project. The potential for CO "hot spots" was evaluated based on the results of the Traffic Impact Study. The project would not result in a degradation in level of service (LOS) to E or worse at any of the study intersections. The project would therefore not result in a CO "hot spot" due to its trip generation. Operational impacts would therefore be less than significant.

3(c) The project would contribute particulate pollution (PM<sub>10</sub>), nitrogen oxide gases (NO<sub>x</sub>), and volatile organic compounds (VOCs) emissions from construction/grading activities; however, the incremental increase would not exceed established screening thresholds (see question 3(b) above).

3(d) The project will introduce additional residential homes, which are considered new sensitive receptors; however, the project site is not located within a quarter-mile of any identified point source of significant emissions. Similarly, the project does not propose

uses or activities that would result in exposure of these sensitive receptors to significant pollutant concentrations and will not place sensitive receptors near any CO hotspots.

- 3(e) The project could produce objectionable odors during construction and operation; however, these substances, if present at all, would only be in trace amounts (less than 1 microgram per cubic meter ( $\mu\text{g}/\text{m}^3$ )). Therefore, the project would not create objectionable odors affecting a substantial number of people.

### Conclusion

The GPU EIR concluded less than significant impacts related to consistency with air quality plans and objectionable odors. With incorporation of mitigation measures, the GPU EIR concluded significant and unavoidable impacts associated with air quality violations, non-attainment criteria pollutants and sensitive receptors. As discussed above, the project would result in less than significant impacts to air quality; therefore, the project would not result in an impact which was not adequately evaluated by the GPU EIR.

	Significant Project Impact	Impact not Identified by GPU EIR	Substantial New 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 checked="" 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 (CDFW) or US Fish and Wildlife Service (USFWS)?	<input 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 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 REC Consultants, dated April 2017 (Appendix C). No state- or federal-listed endangered or threatened species have been found on-site. In addition, no County Group A, B, C or D plant species, County Group 1 or 2 animal species, or state Species of Special Concern have been found on-site. The site contains the following habitats: 1.13 acres of disturbed/developed habitat, .03 field/pasture habitat, and 4.8 acres of non-native grassland habitat. Impacts to 4.8 acres of non-native grassland and 0.03 acres of field/pasture are considered significant and will require mitigation at a 0.5:1 ratio. Impacts to agriculture, developed and disturbed land are not considered significant and will not require mitigation.

Mitigation is proposed to be achieved off-site using one of the following options: 1) Brook Forest Conservation/Mitigation Bank, this bank includes approximately 224 acres of conserved land in Valley Center, west of the proposed project. The bank has approximately 55.5 acres of non-native grassland credits which would allow the project to obtain the 2.06 acres of credits needed; 2) Mitigation Credit Services LLC, this group also has non-native grassland credits in North County which could be purchased for mitigating the project's impacts or; Mitigation Land Specialists, this organization has non-native grassland credits within the North County Multiple Species Conservation Program (MSCP) Boundary which could also accommodate the project's mitigation needs. All of these options would include an endowment for the long-term management of conserved lands; one would be selected with the approval of the County of San Diego, the U.S. Fish and Wildlife Service, and the California Department of Fish and Wildlife. Proof of purchase of the necessary credits would be required to be submitted to the County prior to issuance of the project's grading permit. Impacts to biological habitat are considered less than significant with the inclusion of mitigation.

- 4(b) Based on the Biological Resources Report, jurisdictional wetlands, waters, and/or riparian habitats as defined by the Army Corps of Engineers (ACOE), California Department of Fish and Wildlife (CDFW), and the County of San Diego would not be impacted. The non-native grassland includes a mesic area that contains western ragweed (*Ambrosia psilostachya*) and curly dock (*Rumex crispus*) and can be clearly seen in Google Earth images as a green band running northwest-southeast across the Site. However, no bed and bank, evidence of surface water or nexus to the intermittent/ephemeral blue line drainages east and west of the site were found during the survey or in a review of historic aeriels. Therefore, no jurisdictional wetlands or waterways occur on-site.
- 4(c) As discussed in 4(a) and 4(b) the project would not have any direct impacts to any federal protected wetlands, therefore, no impacts to federally protected wetlands will occur.
- 4(d) The Site's usage as a wildlife corridor or linkage is limited due to its open and exposed nature. The site is surrounded by developed land and agriculture. While the nearest Pre-Approved Mitigation Area (PAMA) is approximately 1600 feet to the north along Moosa Creek, the quality of the creek has been degraded by long-term agricultural uses (e.g., the former Konyn Dairy Farm). In addition, consistent with GPU EIR mitigation measure 1.7, the project would be required to comply with the County's "Dark Skies" ordinance to minimize edge effects, including light trespass, from the project.

Consistent with GPU EIR mitigation measure Bio-1.6, the project will comply with the Resource Protection Ordinance (RPO) which require protection of sensitive habitats and species and include preservation measures such as breeding season avoidance during construction to prevent brushing, clearing, and/or grading between January 15 and August 31.

- 4(e) The site is located within the Draft North County Multiple Species Conservation Program (MSCP). The site is not designated as PAMA. The project is consistent with the MSCP, BMO, and RPO because no sensitive habitat, animal species or plant species would be impacted.

### Conclusion

The GPU EIR concluded less than significant impacts related to consistency with local policies and habitat conservation plans. With incorporation of mitigation measures, the GPU EIR concluded less than significant impacts to federally protected wetlands; significant and unavoidable impacts were identified for impacts associated with special status species, riparian habitat, and wildlife movement corridors. The project could result in potentially significant impacts to biological resources; however, all impacts would be mitigated to a less than significant level. 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 identified as Bio-1.6 and 1.7 will be applied to the project.

### 5. Cultural Resources – Would the Project:

	Significant Project Impact	Impact not Identified by GPU EIR	Substantial New Information
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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

## **Discussion**

- 5(a) Based on an analysis of records and a survey of the property by County of San Diego approved historian, Richard Carrico, it has been determined that there are no impacts to historical resources because they do not occur within the project site. The results of the survey are provided in an historical resources report titled, "Negative Archaeological Inventory Report for APN 186-270-01-00, Located in Valley Center, California", prepared by Richard Carrico, dated January 3, 2017, Appendix D.
- 5(b) Based on an analysis of records and a survey of the property by County of San Diego approved archaeologist, Richard Carrico, it has been determined that there are no impacts to archaeological resources because they do not occur within the project site. The results of the survey are provided in an historical resources report titled, "Negative Archaeological Inventory Report for APN 186-270-01-00, Located in Valley Center, California", prepared by Richard Carrico, dated January 3, 2017, Appendix D.

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. In addition, the project will be conditioned with archaeological monitoring (Cul-2.5) that includes the following:

### **Pre-Construction**

Pre-construction meeting to be attended by the Project Archaeologist and Luiseno Native American monitor to explain the monitoring requirements.

### **Construction Monitoring**

Both the Project Archaeologist and Luiseno 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 Luiseno Native American monitor. Monitoring of previously disturbed soils will be determined by the Project Archaeologist in consultation with the Luiseno Native American monitor.

If cultural resources are identified:

Both the Project Archaeologist and Luiseno 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 Luiseno Native American monitor 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 Luiseno 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 Luiseno 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.

### **Final Grading**

A final report shall be prepared substantiating that earth-disturbing activities are completed and whether cultural resources were encountered.

### **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. Alternatively, prehistoric cultural materials may be 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 geological formations (sensitivity rating of low) that have a limited probability for the presence of paleontological resources.

As considered by the GPU EIR, potential impacts to paleontological resources will be mitigated through monitoring during grading, ordinance compliance and through conformance with the County's Paleontological Resource Guidelines if resources are encountered. The GPU EIR identified these mitigation measures as Cul-3.1.

- 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

With implementation of mitigation measures, the GPU EIR concluded less than significant impacts to cultural resources. The project could result in potentially significant impacts to cultural resources; however, all impacts will be reduced to a less than significant level. 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 (Cul-1.1, 1.6, 2.2, 2.4, 2.5, 2.6, 3.1 and 3.2) will be applied to the project.

	Significant Project Impact	Impact not Identified by GPU EIR	Substantial New Information
<b>6. Geology and Soils – Would the Project:</b>			
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) A Preliminary Geotechnical Site Assessment dated August 5, 2017 was prepared by Christian Wheeler Engineering (Appendix E). 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 near-surface soils encountered at the site are not considered susceptible to liquefaction due to such factors as depth to the groundwater table, soil density and grain-size distribution. Therefore, the liquefaction hazard at the subject site is less than significant and no specific mitigation is required.
- 6(a)(iv) The site is located in landslide susceptibility Area 2. Land within Area 2 is considered to be "marginally susceptible" to land sliding. However, based on the absence of significant slopes on or within the vicinity of the subject site, the potential for slope failures can be considered negligible.
- 6(b) 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 will not result in a significant impact because compliance with the Building Code and implementation of standard engineering techniques will ensure structural safety.
- 6(e) The project will rely on public water and sewer for the disposal of wastewater. No septic tanks or alternative wastewater disposal systems are proposed.

### Conclusion

The GPU EIR concluded less than significant impacts to geology and soil resources. As discussed above, the project would result in less than significant impacts to/from geology/soils; therefore, the project would not result in an impact which was not adequately evaluated by the GPU EIR.

Significant Project Impact	Impact not Identified by GPU EIR	Substantial New Information
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### 7. Greenhouse Gas Emissions – Would the Project:

- a) Generate greenhouse gas (GHG) emissions, either directly or indirectly, that may have a significant impact on the environment?
- b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>



## Discussion

The project would produce GHG emissions through construction activities, vehicle trips, and residential fuel combustion. The annual 900 metric ton carbon dioxide equivalent (MT CO<sub>2</sub>e) screening level is referenced in the California Air Pollution Control Officers Association (CAPCOA) white paper is used as a conservative screening criterion 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 criteria 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).

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

The project proposed the development of 47 dwelling units, and therefore would fall below the screening criteria of 50 units. For projects of this size, it is presumed that the construction and operational GHG emissions would not exceed 900 MT CO<sub>2</sub>e per year, and there would be a less-than cumulatively considerable impact.

As described in the Global Climate Change Evaluation prepared by Eilar Associates, Inc. dated March 27, 2017 (Appendix F), the County PDS draft guidance recommends that the emissions be amortized over 20 years and added to operational emissions, as appropriate. Amortized over 20 years, construction would contribute 31 metric tons per year of CO<sub>2</sub>e emissions. These emissions were added to the operational GHG emissions to evaluate their significance. Operational GHG emissions were calculated using the CalEEMod Model, with adjustments to account for site-specific conditions. Operational emissions are estimated to be 874 metric tons of CO<sub>2</sub>e annually. Project design features include EnergyStar appliances, low-flow fixtures, water-efficient outdoor irrigation, and a 20% reduction in solid waste generation. Therefore, the project would not result in a significant impact due to greenhouse gas emissions.

- 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 greenhouse gas reductions. The project would also be consistent with state regulations that set forth emissions reduction targets, such as Assembly Bill 32 and the Global Warming Solutions Act (as evaluated in Appendix F). 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 greenhouse gas emissions; therefore, the project would not result in an impact which was not adequately evaluated by the GPU EIR.

	Significant Project Impact	Impact not Identified by GPU EIR	Substantial New 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

## Discussion

- 8(a) A Phase I Environmental Site Assessment dated September 1, 2016 was prepared by Christian Wheeler Engineering (Appendix G). As discussed in these reports, 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.
- 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, the project site has not been subject to a release of hazardous substances. Additionally, the project does not propose structures for human occupancy or significant linear excavation within 1,000 feet of an open, abandoned, or closed landfill, is not located on or within 250 feet of the boundary of a parcel identified as containing burn ash (from the historic burning of trash), and is not on or within 1,000 feet of a Formerly Used Defense Site.
- 8(d) The proposed project is not located within an Airport Land Use Compatibility Plan (ALUCP), an Airport Influence Area, or a Federal Aviation Administration Height Notification Surface. Also, the project does not propose construction of any structure equal to or greater than 150 feet in height, constituting a safety hazard to aircraft and/or operations from an airport or heliport.
- 8(e) The proposed project is not within one mile of a private airstrip.
- 8(f)(i) Operational Area Emergency Plan and Multi-Jurisdictional Hazard Mitigation Plan: The project will not interfere with this plan because it will not prohibit subsequent plans from being established or prevent the goals and objectives of existing plans from being carried out.
- 8(f)(ii) SAN DIEGO COUNTY NUCLEAR POWER STATION EMERGENCY RESPONSE PLAN: The property is not within the San Onofre emergency planning zone.
- 8(f)(iii) OIL SPILL CONTINGENCY ELEMENT: The project is not located along the coastal zone.
- 8(f)(iv) EMERGENCY WATER CONTINGENCIES ANNEX AND ENERGY SHORTAGE RESPONSE PLAN: The project would not alter major water or energy supply infrastructure which could interfere with the plan.
- 8f)(v) DAM EVACUATION PLAN: The project is not located within a dam inundation zone.
- 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 Santa Margarita Consulting (Appendix M). Also, a Fire Service Availability Letter has been received from the Valley Center Fire Protection District which indicates the expected emergency travel time to the project site to be less

than 5 minutes which is within the 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.

### Conclusion

The GPU EIR concluded less than significant impacts regarding the following: use, disposal and transportation of hazardous materials; accidental release of hazardous materials; hazards to schools; the presence of existing hazardous material sites; and hazards associated with vectors. In addition, with implementation of mitigation measures, the GPU EIR concluded less than significant impacts associated with public and private airports, and consistency with emergency response and evacuation plans. The GPU concluded significant and unavoidable impacts associated with wildfires. As discussed above, the project would result in less than significant impacts to/from hazards/hazardous materials; therefore, the project would not result in an impact which was not adequately evaluated by the GPU EIR.

	Significant Project Impact	Impact not Identified by GPU EIR	Substantial New 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 checked="" 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 checked="" 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 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) Substantially alter the existing drainage pattern of the	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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 Preliminary Drainage Study (TSAC Engineering, July 2017; Appendix H) and a Priority Development Project Stormwater Quality Management Plan (SWQMP; TSAC Engineering June 2017; Appendix I), have been prepared for the project.

The project will require a National Pollutant Discharge Elimination System (NPDES) General Permit for Discharges of Storm Water Associated with Construction Activities. The project applicant has provided a 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 Urban Runoff Management Program (JURMP) and Standard Urban Storm Water Mitigation Plan (SUSMP). These measures are consistent with GPU EIR mitigation measures Hyd-1.1 through Hyd-1.4.

9(b) The project lies in the San Luis Rey – Escondido Watershed. According to the Clean Water Act Section 303(d) list, a portion of this watershed is impaired with the following constituents of concern: coliform bacteria, nutrients, sediment, lowered dissolve oxygen, and trace 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 treatment control BMPs to prevent a significant increase of pollutants to receiving waters. These measures are consistent with GPU EIR mitigation measures Hyd-1.1 through Hyd-1.4.

- 9(c) As stated in responses 9(a) and 9(b) above, implementation of GPU EIR mitigation measures Hyd-1.1 through Hyd-1.4., BMPs and compliance with required ordinances will ensure that project impacts are less than significant.
- 9(d) The project will obtain potable water from the Valley Center Municipal Water District that obtains water from surface reservoirs or other imported sources.
- 9(e) As outlined in the project's SWQMP, the project will implement source control and/or treatment control BMP's to reduce potential pollutants, including sediment from erosion or siltation, to the maximum extent practicable from entering storm water runoff. These measures would be consistent with GPU mitigation measures Hyd-1.2 and Hyd-1.3.
- 9(f) The project will not significantly alter established drainage patterns or significantly increase the amount of runoff for the following reasons: based on a Drainage Study prepared by TSAC Engineering dated July 2017, drainage will be conveyed to either natural drainage channels or approved drainage facilities.
- 9(g) Drainage will be conveyed to either natural drainage channels or approved drainage facilities. The project does not propose to create or contribute runoff water that would exceed the capacity of existing or planned storm water drainage systems. Implementation of GPU EIR mitigation measures Hyd-1.1 through Hyd-1.4, BMPs and compliance with required ordinances will ensure that project impacts are less than significant.
- 9(h) As described in question 9 a) above, the project has the potential to generate pollutants; however, GPU EIR mitigation measures Hyd-1.1 through Hyd-1.4, site design measures, source control BMPs, and treatment control BMPs will be employed such that potential pollutants will be reduced to the maximum extent practicable, such that the proposed project will not cause or contribute to an exceedance of applicable surface or groundwater receiving water quality objectives or degradation of beneficial uses.
- 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.
- 9(j) No 100-year flood hazard areas were identified on the project site or off-site 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

The GPU EIR concluded significant and unavoidable impacts associated with consistency with water quality standards and requirements. With implementation of mitigation measures, the GPU EIR concluded less than significant impacts for all other issues areas associated with hydrology and water quality. As discussed above, the project would result in less than significant impacts to/from hydrology/water quality; therefore, the project would not result in an impact which was not adequately evaluated by the GPU EIR.

	Significant Project Impact	Impact not Identified by GPU EIR	Substantial New 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 that would divide an established community. Build-out of this site was anticipated in the GPU EIR and GPU EIR mitigation measures Lan-1.1 through Lan-1.3 requiring coordination efforts to ensure that development of the site would not divide an established community.

10(b) The project would subdivide a 5.2-acre property into 47 residential lots, which is consistent with the Village Core, Village Residential and Rural Land development densities established by the General Plan. Existing zoning for the site is Holding Zone (S90). The proposed REZ would alter the S90 zone to Variable Residential (RV). Therefore, 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.

CEQA Guidelines Section 15183 allows for any rezoning action that is consistent with the GPU EIR. The project REZ would change the S90 zone to RV, which is consistent with the underlying land use designation of Village Core.

### Conclusion

The GPU EIR concluded less than significant impacts associated with consistency of land use plans, policies, regulations, and habitat conservation plans. With implementation of mitigation measures, the GPU EIR concluded less than significant impacts associated with the physical division of established communities. As discussed above, the project would result in less than

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

	Significant Project Impact	Impact not Identified by GPU EIR	Substantial New 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 residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

### Discussion

11(a) The project site has been classified by the California Department of Conservation – Division of Mines and Geology as inconclusive (MRZ-4). However, the project site is surrounded by existing and entitled residential development 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

The GPU EIR concluded significant and unavoidable impacts to mineral resources. As discussed above, the project would result in less than significant impacts to mineral resources; therefore, the project would not result in an impact which was not adequately evaluated by the GPU EIR.

	Significant Project Impact	Impact not Identified by GPU EIR	Substantial New Information
<b>12. Noise – Would the Project:</b>			
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 checked="" 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?

☒☐☐

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

☐☐☐

f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

☐☐☐

### Discussion

- 12(a) An Acoustical Analysis Report was prepared by Eliar Associates, Inc. on January 2017 (Appendix J). The project is a subdivision of a 5-acre lot consisting of 47 single-family, two-story, detached residences area. Noise mitigation in the form of sound walls and a Noise Restriction Easement would be required to ensure the project would not expose people to potentially significant noise levels that exceed the allowable limits of the County of San Diego General Plan, County of San Diego Noise Ordinance, and other applicable standards for the following reasons:

#### General Plan – Noise Element

The County of San Diego General Plan, Noise Element addresses noise sensitive areas and requires an acoustical study to be prepared for any use that may expose noise sensitive receptors at single-family residences to noise in excess of 60 A-weighted decibels (dBA) Community Noise Equivalent Level (CNEL) for exterior areas or 45 dBA CNEL for interior habitable rooms. Moreover, if the project is in excess of 60 dBA CNEL, modifications must be made to project to reduce noise levels.

The 60 dBA CNEL noise contour would extend into approximately the first two rows of homes from Mirar de Valle Road. Exterior noise levels would exceed thresholds for the first row of homes (Lots 7, 13, 19, 25, 31, 37, 42, and 48). To ensure any exterior areas of these homes are in conformance of the Noise Element, noise mitigation would be required that would require a six-foot sound wall spanning the north edges of Lots 7, 13, 19, 25, 31, 37, 42, and 48, with a return along the west sides of Lots 6 and 7 and along the east sides of Lots 46 through 48 (please see Figure 8 of the Acoustical Analysis Report for conceptual sound wall layout). Incorporation of the sound walls would reduce traffic noise to 60 dBA CNEL and below at the exterior areas. After implementation of the sound wall, second story habitable rooms at Lots 6, 7, 12, 13, 18, 19, 24, 25, 30, 31, 36, 37, 41, 42, 47, and 48 may still exceed the 45 dBA CNEL interior noise threshold. The project would be required to dedicate a Noise Restriction Easement to ensure the project will demonstrate interior noise levels of 45 dBA CNEL and exterior noise levels of 60 dBA CNEL are demonstrated prior to building permit approval. Additionally, the project related traffic contributions to nearby roadways would not create any off-site noise impacts. Therefore, with incorporation of mitigation and a Noise Restriction Easement, the project will not expose people to potentially significant noise levels that exceed the allowable limits of the County of San Diego General Plan, Noise Element.

Noise Ordinance – Section 36.404

The project is subject to County Noise Ordinance limits for stationary sources, listed in Section 36.404. Based upon the Acoustical Analysis Report prepared by Eilar Associates, Inc., dated January 16, 2017, the project's heating, ventilation, and air conditioning (HVAC) units would not exceed the most restrictive nighttime noise limit of 45 dBA at the project property lines, and the project would be in compliance with Section 36.404. Impacts from project stationary sources would be less than significant.

Noise Ordinance – Section 36.409

The project is also subject to temporary construction noise requirements. The County Noise Ordinance, Section 36.409, allows an eight-hour average 75 dBA sound level limit at the boundary of an occupied structure for the operations of construction equipment. Grading is expected to take place over three to four weeks. No materials processing and no blasting would occur. The construction equipment hours would be limited pursuant to Section 36.408. Construction equipment operations would be conditioned to comply with the County Noise Ordinance not to exceed the 75 dBA eight-hour average sound level requirement. Based on the aforementioned reasons, staff does not anticipate noise levels to exceed the 75 dBA eight-hour average construction noise limit and impacts from construction noise would be less than significant. 12(b) The project proposes residences where low ambient vibration is essential for interior operation and/or sleeping conditions. However, consistent with GPU EIR mitigation measure Noi-3.2, facilities are typically setback more than 50 feet from any County Mobility Element roadway using rubber-tired vehicles with projected groundborne noise or vibration contours of 38 vibration decibels (VdB) or less; any property line for parcels zoned industrial or extractive use; and/or any permitted extractive uses. A setback of 50 feet from the roadway centerline for heavy-duty truck activities would ensure that these proposed uses or operations would not be impacted significantly by groundborne vibration or groundborne noise levels (Harris, Miller Miller and Hanson Inc., Transit Noise and Vibration Impact Assessment 1995, Rudy Hendriks, Transportation Related Earthborne Vibrations 2002). This setback ensures 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) 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 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.

In addition, 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(d) The project involves the following permanent noise sources that may increase the ambient noise level: Vehicular traffic on nearby roadways and heating, ventilation and air conditioning (HVAC) equipment. The project would not expose existing or planned noise sensitive areas in the vicinity to a substantial permanent increase in noise levels that exceed the allowable limits of the County of San Diego General Plan, County of San Diego Noise Ordinance, and other applicable local, State, and Federal noise control. Impacts would be less than significant.
- 12(d) The project does not involve any operational uses that may create substantial temporary or periodic increases in ambient noise levels in the project vicinity. Also, consistent with GPU EIR mitigation measure Noi-4.1, the project must comply with the Noise Ordinance; general construction noise is not expected to exceed the construction noise limits of the Noise Ordinance. Construction operations will occur only during permitted hours of operation. Also, the project will not operate construction equipment in excess of 75 dB for more than eight hours during a 24 hour period.
- 12(e) The project is not located within an Airport Land Use Compatibility Plan (ALUCP) for airports or within two 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**

The GPU EIR concluded significant and unavoidable impacts associated with the permanent increase in ambient noise levels. With implementation of mitigation measures, the GPU EIR concluded less than significant impacts associated with all other resource topics for noise. The project could result in potentially significant impacts related to noise; however, impacts would be reduced to a less than significant level. 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 as Noi-1.2, 3.2 and 4.1 will be applied to the project.

	Significant Project Impact	Impact not Identified by GPU EIR	Substantial New Information
<b>13. Population and Housing – Would the Project:</b>			
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 proposes 47 residential units. Based on SANDAG population data for North County East, there would be 3.04 residents per household for a total population of 1,012 residents. However, the project will not induce substantial population growth in an area, because the extension of infrastructure and public facilities such as water, sewer or roadways into previously unserved areas is consistent with the County General Plan and the project will be consistent County planning goals. Furthermore, the project is consistent with the development density analyzed in the GPU EIR for this site.
- 13(b) The vacant site would be replaced by 47 residential units. Therefore, the project will not displace a significant amount existing housing.
- 13(c) The proposed project will not displace a substantial number of people because the site does not contain residences.

### Conclusion

The GPU EIR concluded less than significant impacts associated with population and housing. As discussed above, the project would result in less than significant impacts to populations/housing; therefore, the project would not result in an impact which was not adequately evaluated by the GPU EIR.

Significant Project Impact	Impact not Identified by GPU EIR	Substantial New Information
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#### 14. Public Services – Would the Project:

a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance service ratios for fire protection, police protection, schools, parks, or other public facilities?



#### Discussion

14(a) The project does not include construction of new or altered governmental facilities. The proposed residential units are consistent with the General Plan projections, therefore, service ratios for public services associated with the project were analyzed within the GPU EIR and the project is generally not anticipated to require additional services.

The project's Service Availability Form from the Valley Center Fire Protection District (Appendix K) identifies that the department does not have adequate resources to accommodate for an increase in wildfire risks. The project is required to pay development fees for fire services to ensure adequate service ratios, consistent with GPU EIR mitigation measure 1.9.

Although, the project's residents were assumed in the GPU EIR, if required, the project would be subject to payment of public facilities development impact fees at the rate in effect at the time building permits are issued to ensure adequate police protection services are available.

The Service Availability Forms from Valley Center Elementary, Middle, and High Schools (Appendix K) identify that the project would result in overcrowding of the elementary school. However, consistent with GPU EIR mitigation measure 3.1, the project will pay development fees to the school.

Consistent with GPU EIR mitigation measure 1.5, to avoid substantial physical deterioration of local recreation facilities the project will be required to pay in-lieu fees pursuant to the Park Land Dedication Ordinance (PLDO).

Based on the aforementioned, the project will not result in substantial adverse physical impacts associated with fire and police protection, schools, parks or other public facilities.

#### Conclusion

The GPU EIR concluded significant and unavoidable impacts associated with school services. With implementation of mitigation measures, the GPU EIR concluded less than significant impacts associated with all other resource topics for public services. The project could result in potentially significant impacts related to public services; however, impacts would be reduced to a less than significant level. 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 as Pub-1.5, 1.9 and 3.1 will be applied to the project.

	Significant Project Impact	Impact not Identified by GPU EIR	Substantial New Information
<b>15. Recreation</b> – Would the Project:			
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input checked="" 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 involves a 47-unit residential development that may increase the use of existing neighborhood and regional parks or other recreational facilities. Consistent with GPU EIR mitigation measure Rec-1.5, to avoid substantial physical deterioration of local recreation facilities the project will be required to pay in-lieu fees pursuant to the Park Land Dedication Ordinance (PLDO). The Park Land Dedication Ordinance (PLDO) is the mechanism that enables the funding or dedication of local parkland in the County.

15(b) As described above in 15(a), the project will pay in-lieu fees pursuant to the PLDO, therefore, the project will not have an adverse physical effect on the environmental through the construction of recreational facilities.

### Conclusion

With implementation of mitigation measures, the GPU EIR concluded less than significant impacts associated with recreation. The project could result in potentially significant impacts related to recreation; however, impacts would be reduced to a less than significant level. 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 as Rec- 1.5 will be applied to the project.

	Significant Project Impact	Impact not Identified by GPU EIR	Substantial New Information
<b>6. 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 mass transit?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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 facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

### Discussion

16(a) A Traffic Impact Study, dated April 2017 prepared by Darnell & Associates was completed for the proposed project (Appendix L). As discussed in the study, new project trips would be distributed onto County roads. The project will result in an additional 6,188 average daily trips (ADT) to roadways in the project area.

Level of Service (LOS) is a professional industry standard by which the operating conditions of a given roadway segment or intersection is measured. Level of Service is defined on a scale of A to F; where LOS A represents the best operating conditions and LOS F represents the worst operating conditions. LOS A facilities are characterized as having free flowing traffic conditions with no restrictions on maneuvering or operating speeds; traffic volumes are low and travel speeds are high. LOS F facilities are

characterized as having forced flow with many stoppages and low operating speeds. The LOS ranges are defined below:

Level of Service Ranges			
Level of Service	Roadway Segments – Average Daily Traffic (ADT) Volume <sup>1</sup>	Signalized Intersections – Delay (Seconds/Vehicle) <sup>2</sup>	Unsignalized Intersections – Delay (Seconds/Vehicle) <sup>2</sup>
A	Less Than 1,900	Less Than or Equal to 10.0	Less Than or Equal to
B	1,901 to 4,100	10.1 to 20.0	10.1 to 15.0
C	4,101 to 7,100	20.1 to 35.0	15.1 to 25.0
D	7,101 to 10,900	35.1 to 55.0	25.1 to 35.0
E	10,901 to 16,200	55.1 to 80.0	35.1 to 50.0
F	Greater Than 16,200	Greater than 80.0	Greater than 50.0

<sup>1</sup> The volume ranges are based on the County of San Diego Circulation Element of a Light Collector, the average d  
vided in Appendix A.  
<sup>2</sup> Highway Capacity Manual (HCM).

As described in the Traffic Impact Study, build out of the proposed project is estimated to generate a total of 376 average daily trips. The project does not have any direct impacts to roadway segments or intersections.

The project is considered to be part of cumulative impacts. To mitigate projects cumulative impacts the project will be required to participate in the County of San Diego Traffic Impact Fees (TIF) Program and will pay the current County TIF Fees at the time building permits are issued.

In March 15 of 2017, the Agricultural Promotion Program and associated Environmental Impact Report (EIR) were approved by the County Board of Supervisors. The program is anticipated to add 26,157 daily trips to roadways within the unincorporated County and the EIR identified new roadway segments with deficient LOS. Although the Agricultural Promotion Program is anticipated to introduce 280 trips to Lilac Road, 310 trips to Mirar De Valle, and 364 trips to Valley Center Road, these roads were previously accepted at LOS E/F. Therefore there are not any new cumulative impacts associated with the Agricultural Promotion Program when considered with the proposed project. Like the proposed project, all cumulative projects developed as part of the Agricultural Promotion Program will be required to pay TIF to reduce cumulative impacts. Furthermore, the TIF program is expected to be updated in September 2017 to account for increased traffic from GPAs including the Agricultural Promotion Ordinance. Therefore, the proposed project, in combination with other cumulative projects would not conflict with an applicable plan, ordinance or policy establishing measures of the effectiveness for the performance of the circulation system.

- 16(b) The designated congestion management agency for the County is the San Diego Association of governments (SANDAG). SANDAG is responsible for preparing the Regional Transportation Plan (RTP) of which the Congestion Management Program (CMP) is an element to monitor transportation system performance, develop programs to address near- and long-term congestion, and better integrate land use and transportation planning decisions. The CMP includes a requirement for enhanced CEQA review applicable to certain large developments that generate an equivalent of



2,400 or more average daily vehicle trips or 200 or more peak hour vehicle trips. These large projects must complete a traffic analysis that identifies the project's impacts on CMP system roadways, their associated costs, and identify appropriate mitigation.

The project would not conflict with the SANDAG Congestion Management Process because it is consistent with the General Plan which is part of the Regional Plan. The Regional Plan meets the requirements of congestion management by incorporating the following process: (1) performance monitoring and measurement of the regional transportation system; (2) multimodal alternatives and non-single occupancy vehicles (SOV) analysis; (3) land use impact analysis; (4) the provision of congestion management tool; and (5) integration with the Regional Transportation Improvement Program (RTIP) process. Cumulative impacts will also be mitigated by payment of the County TIF.

- 16(c) The proposed project is located outside of an Airport Influence Area and is not located within two miles of a public or public use airport.
- 16(d) The proposed project will not substantially alter traffic patterns, roadway design, place incompatible uses (e.g., farm equipment) on existing roadways, or create curves, slopes or walls which would impede adequate sight distance on a road.
- 16(e) The Valley Center Fire Protection District 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. In addition, consistent with GPU EIR mitigation measure Tra-4.2, the project will implement the Building and Fire codes to ensure emergency access accessibility.
- 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**

The GPU EIR concluded significant and unavoidable impacts associated with local and adjacent jurisdiction LOS standards, and rural road safety. With implementation of mitigation measures, the GPU EIR concluded less than significant impacts associated with emergency access, parking and alternative transportation. The project could result in potentially significant cumulative impacts to traffic; however, all impacts would be reduced to a less than significant level. Further environmental analysis is not required because:

- 1. No peculiar impacts to the project or its site have been identified.
- 2. Although cumulative impacts associated with the Agricultural Promotion Program were not analyzed in the GPU EIR, impacts would be less than significant as described above in 16(a).
- 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 under Tra-1.7 will be applied to the project.

	Significant Project Impact	Impact not Identified by GPU EIR	Substantial New 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 would discharge domestic waste to a community sewer system that is permitted to operate by the Regional Water Quality Control Board (RWQCB). A project Service Availability Form has been received from the Valley Center Municipal Water District that indicates that there is adequate capacity to serve the project (Appendix K).
- 17(b) The project involves new water and wastewater pipeline extensions. A Service Availability Form from the Valley Center Municipal Water District has been provided, which indicates that there is adequate wastewater capacity to serve the project (Appendix K). In addition, the applicant is required to participate in, and contribute funding for, a future Valley Center Municipal Water District Phase 3 Sewer Expansion, which has already undergone environmental review by the Valley Center Municipal Water District.

- 17(c) The project involves new stormwater 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 Form from the Valley Center Municipal Water District has been provided which indicates that there is adequate water to serve the project.
- 17(e) A Service Availability Form from the Valley Center Municipal Water District has been provided, which indicates that there is adequate wastewater capacity to serve the project.
- 17(f) Implementation of the project will generate solid waste. All solid waste facilities, including landfills require solid waste facility permits to operate. The project will deposit all solid waste at a permitted solid waste facility and therefore, will comply with Federal, State, and local statutes and regulations related to solid waste.
- 17(g) The project will deposit all solid waste at a permitted solid waste facility.

### **Conclusion**

The GPU EIR concluded significant and unavoidable impacts associated with providing adequate water services and landfill capacity. With implementation of mitigation measures, the GPU EIR concluded less than significant impacts associated with wastewater requirements, providing adequate new water or wastewater facilities, stormwater drainage facilities, wastewater facilities and energy utilities. Impacts associated with solid waste regulations were identified as less than significant. As discussed above, the project would result in less than 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:**

Attachment 1 – Summary of Determinations and Mitigation within the Final Environmental Impact Report, County of San Diego General Plan Update, SCH # 2002111067

### **Appendices:**

- A- Agricultural Report
- B- Air Quality Report
- C- Biological Resources Report
- D- Cultural Resources Inventory
- E- Geotechnical Site Assessment
- F- Global Climate Change Evaluation
- G- Phase I Site Assessment
- H- Drainage Study
- I- Priority Development Project Storm Water Quality Management Plan
- J- Acoustical Analysis
- K- Service Availability Forms
- L- Traffic Impact Study
- M- Fire Protection Plan

## **Attachment 1**

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)