



# County of San Diego

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

**Project Name:** Alpine 21 Tentative Map  
**Project Record Numbers:** PDS2005-3100-5431  
**Environmental Log Number:** PDS2005-3910-0514020  
**Habitat Loss Number:** PDSXXXX-HLP-XXX

**APN(s):** 403-160-15-00

**Lead Agency Name and Address:**

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**Project Location:** The proposed project (Project) is located within the unincorporated community of Alpine in eastern San Diego County. The 80.7-acre site is located off Country Meadows Road in Alpine. The site is located within the Alpine Community Plan area. Semi-rural family residential development within the unincorporated County abuts the Project site to the north, east, and west, and Interstate 8 abuts the property to the south.

**Project Applicant Name and Address:**

Darcy Jones  
535 North Highway 101, Ste. A  
Solana Beach, CA 92075

**General Plan**

Community Plan: Alpine  
Regional Categories: Semi-Rural  
Land Use Designations: Semi-Rural Residential (SR-1)  
Density: SR-1  
Floor Area Ratio (FAR): N/A

**Zoning**

**Use Regulation:** Limited Agricultural (A70)  
Minimum Lot Size: 1 Acre  
Special Area Regulation: N/A

**Description of Project:**

Project Site Description:

The Alpine 21 project (Project) proposed the subdivision of a single 80.7-acre parcel into 20 single-family lots within the Alpine Community Plan area. The Project site is currently vacant and is surrounded primarily by single-family residential subdivisions to the north, east, and west. The Project site is directly adjacent to Interstate 8, which bounds the site to the south. The site and surrounding land are moderately sloped with an average slope over the majority of the property between 15% and 25%. Access to each parcel would be provided by private driveways connecting to proposed private roads connecting to Victoria Circle, a public road, via Country Meadows Drive, a private road. Proposed earthwork quantities for the Project consist of 50,018 cubic yards of cut and 57,795 cubic yards of fill with approximately 7,777 cubic yards of import and no export required.

The General Plan Regional Category for the Project site is Semi-Rural, and the General Plan Land Use Designation is Semi-Rural Residential (SR-1), which allows 1 unit per acre. The Project proposes 20 total lots, the smallest of which exceeds the 1-acre minimum. The Zoning Use Regulation for the site is Limited Agricultural (A70) with no Special Area Designators.

Discretionary Actions:

The discretionary permit required for the Project is a Tentative Map. The Tentative Map would subdivide the lot into 20 single-family residential lots. The Project is consistent with the residential density allowed under the County General Plan.

**Overview of 15183 Checklist**

California Public Resources Code section 21083.3 and California Environmental Quality Act (CEQA) Guidelines Section 15183 provide an exemption from additional environmental review for projects that are consistent with the development density established by existing zoning, community plan or general plan policies for which an Environmental Impact Report (EIR) was certified, except as might be necessary to examine whether there are project-specific significant effects which are peculiar to the project or its site. Section 15183 specifies that examination of environmental effects shall be limited to those effects that: (1) Are peculiar to the project or the parcel on which the project would be located, and were not analyzed as significant effects in a prior EIR on the zoning action, general plan, or community plan, with which the project is consistent, (2) Are potentially significant off-site impacts and cumulative impacts which were not discussed in the prior EIR prepared for the general plan, community plan or zoning action, or (3) Are previously identified significant effects which, as a result of substantial new information which was not known at the time the EIR was certified, are determined to have a more severe adverse impact than discussed in the prior EIR. Section 15183(c) further specifies that if an impact is not peculiar to the parcel or to the proposed project, has been addressed as a significant effect in the prior EIR, or can be substantially mitigated by the imposition of uniformly applied development policies or standards, then an additional EIR need not be prepared for that project solely on the basis of that impact.

### General Plan Update Program EIR

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

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

### Summary of Findings

The Alpine 21 Tentative Map Project is consistent with the analysis performed for the GPU EIR. Further, the GPU EIR adequately anticipated and described the impacts of the 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 General Plan Update Final Program EIR (GPU EIR, ER #02-ZA-001, SCH #2002111067), and all required findings can be made.

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

1. **The Project is consistent with the development density established by existing zoning, community plan or general plan policies for which an EIR was certified.**  
The Project would subdivide an 80.7-acre property into 20 lots, which is consistent with the SR-1 development density established by the General Plan and the certified GPU EIR.
2. **There are no Project specific effects which are peculiar to the Project or its site, and which the GPU EIR Failed to analyze as significant effects.**

The subject property is no different than other properties in the surrounding area, and there are no Project specific effects which are peculiar to the Project or its site. The Project site is located in an area developed with similarly sized residential lots with associated accessory uses. The property does not support any peculiar environmental features, and the Project would not result in any peculiar effects.

In addition, as explained further in the 15183 Checklist below, all Project impacts were adequately analyzed by the GPU EIR. The Project could result in potentially significant impacts to Biological Resources, Cultural Resources, Hydrology and Water Quality, Transportation and Traffic, and Wildfire. However, applicable mitigation measures specified within the GPU EIR have been made conditions of approval for this Project.

**3. There are no potentially significant off-site and/or cumulative impacts which the GPU EIR failed to evaluate.**

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

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

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

**5. The Project will undertake feasible mitigation measures specified in the GPU EIR.**

As explained in the 15183 exemption checklist below, the Project will undertake feasible mitigation measures specified in the GPU EIR. These GPU EIR mitigation measures will be undertaken through Project design, compliance with regulations and ordinances, or through the Project's conditions of approval.



Signature

**6/11/2020**

Date

**Heather Steven**

Printed Name

**Project Manager**

Title

## CEQA Guidelines §15183 Exemption Checklist

### Overview

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

- Items checked “Significant Project Impact” indicates that the Project could result in a significant effect which either requires mitigation to be reduced to a less than significant level or which has a significant, unmitigated impact.
- Items checked “Impact not identified by GPU EIR” indicates the Project would result in a Project specific significant impact (peculiar off-site or cumulative that was not identified in the GPU EIR.
- Items checked “Substantial New Information” indicates that there is new information which leads to a determination that a Project impact is more severe than what had been anticipated by the GPU EIR.

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

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

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

**Discussion**

1(a) The GPU EIR concluded this impact to be less than significant with mitigation. A vista is a view from a particular location or composite views along a roadway or trail. Scenic vistas often refer to views of natural lands but may also be compositions of natural and developed areas, or even entirely of developed and unnatural areas, such as a scenic vista of a rural town and surrounding agricultural lands. What is scenic to one person may not be scenic to another, so the assessment of what constitutes a scenic vista must consider the perceptions of a variety of viewer groups.

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

As described in the General Plan Update Environmental Impact Report (GPU EIR; County of San Diego 2011), the County contains visual resources affording opportunities for scenic vistas in every community. Resource Conservation Areas (RCAs) are identified within the GPU EIR and are the closest that the County comes to specifically designating scenic vistas. Many public roads in the County currently have views of RCAs or expanses of natural resources that would have the potential to be considered scenic vistas. Numerous public trails are also available throughout the County. New development can often have the potential to obstruct, interrupt, or detract from a scenic vista.

The Project site is located at 2683 Country Meadows Road, within the Alpine Community Planning Area in the unincorporated County of San Diego. The Viejas Mountain RCA is located approximately 1 mile to the east of the Project Site and has been identified within the Alpine Community Plan as a significant aesthetic landmark and a visual resource pursuant to the County of San Diego Guidelines for Determining Significance. While views of the Project site may be afforded from Viejas Mountain, Project consistency with existing surrounding development will not detract from any views associated with RCAs. The Project is surrounded to the west, north, and east by residential land uses that are similar in size, scale, and density to the proposed Project.

Trail systems exist nearby, connecting to the trails ascending Viejas Mountain to the east, however topographically accessible views to the project would be minimal and sporadic to recreationalists on these trails. The Project site is located approximately 0.3 miles from the Anderson Road Trail, which affords minimal views of the Project site due to intervening land uses. Additionally, as mentioned above, the Project would be consistent with the surrounding residential land uses and would not detract from views from nearby trails or trail systems.

As previously discussed, the GPU EIR determined impacts on scenic vistas to be less than significant with mitigation. As the proposed Project would have a less-than-significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 1(b) The GPU EIR concluded this impact to be less than significant with mitigation. State scenic highways refer to those highways that are officially designated by the California Department of Transportation (Caltrans) as scenic (Caltrans - California Scenic Highway Program). Generally, the area defined within a State scenic highway is the land adjacent to and visible from the vehicular right-of-way. The dimension of a scenic highway is usually identified using a motorist's line of vision, but a reasonable boundary is selected when the view extends to the distant horizon. The scenic highway corridor extends to the visual limits of the landscape abutting the scenic highway.

The project is not within the vicinity of a designated State scenic highway. However, the County General Plan identifies roadways that are designated as scenic corridors within the Conservation and Open Space Element and have been included as part of the County Scenic Highway System. The Project site is bounded to the south by Interstate 8 (I-8) which is a designated scenic roadway that spans from the El Cajon city limits to the Imperial County Line. Due to intervening topography, direct views of the Project site from I-8 would be minimal. While occasional peek views to the Project site are available from I-8, views would be further minimized by concentrating development toward the northern portion of the Project site. Additionally, the site is surrounded to the west, north, and east by residential land uses which are similar in size, scale, and density. Therefore, the Project would not detract from or substantially damage scenic resources associated with a State or County scenic highway.

As previously discussed, the GPU EIR determined impacts on scenic resources to be less than significant with mitigation. As the proposed Project would have a less-than-significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 1(c) The GPU EIR concluded this impact to be significant and unavoidable. Visual character is the objective composition of the visible landscape within a viewshed. Visual character is based on the organization of the pattern elements line, form, color, and texture. Visual character is commonly discussed in terms of dominance, scale, diversity and continuity. Visual quality is the viewer's perception of the visual environment and varies based on exposure, sensitivity and expectation of the viewers.

The Project site is within a semi-rural area of the Alpine community, located on Country Meadows Road, between Victoria Drive and E. Victoria Drive. The existing visual character and quality of the Project surrounding are characterized by semi-rural residential

development on large lots to the west, north, and east, and higher-density residential to the south, with relatively flat to moderately sloped grades.

The proposed Project would not detract from, or contrast with the existing visual character and/or quality of the surrounding areas for the following reasons: consistency with the General Plan density allowance on-site, conformance with the Alpine Community Plan, and location of the site within a semi-rural residential area. Additionally, the location, size, and scale of the proposed use would be compatible with adjacent uses. The proposed development is similar to surrounding single-family residential use types nearby to the west, north, and east.

As previously discussed, the GPU EIR determined impacts on visual character or quality to be significant and unavoidable. However, the Project would have a less-than-significant impact with no required mitigation for the reasons detailed above. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 1(d) The GPU EIR concluded this impact to be significant and unavoidable. The proposed Project will use outdoor lighting and is located within Zone B as identified by the San Diego County Light Pollution Code, approximately 20 miles from the Mount Laguna Observatory. The Project will not adversely affect nighttime views or astronomical observations, because the project will conform to the Light Pollution Code (Section 51.201-51.209), including the Zone B lamp type and shielding requirements per fixture and hours of operation limitations for outdoor lighting and searchlights. The code was developed by the County in cooperation with the lighting engineers, astronomers, and other experts to effectively address and minimize the impact of new sources light pollution on nighttime views. Compliance with the Code would be required prior to issuance of a building permit. Thus, 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.

As previously discussed, the GPU EIR determined impacts from light or glare to be significant and unavoidable. However, the proposed Project would have a less-than-significant impact with no required mitigation for the reasons detailed above. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

## **Conclusion**

With regards to the issue area of Aesthetics, the following findings can be made:

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. No mitigation measures contained within the GPU EIR would be required because Project specific impacts would be less than significant.



<b>Significant Project Impact</b>	<b>Impact not identified by GPU EIR</b>	<b>Substantial New Information</b>
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## 2. Agriculture/Forestry Resources

– Would the Project:

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

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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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"/>
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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"/>
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e) Involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Important Farmland or other agricultural resources, to non-agricultural use?

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

2(a) The GPU EIR concluded this impact to be significant and unavoidable. The Project site does not contain candidate soils which have been mapped by the Farmland Mapping and Monitoring Program (FMMP) of the California Resources Agency as Prime Farmland, Unique Farmland, or Farmland of Statewide or Local Importance. Soils on site are cieneba rocky coarse sandy loam, 9% to 30% slopes, eroded (CmE<sub>2</sub>) and cieneba Fallbrook rocky sandy loam, 30% to 65% slopes, eroded (CmG<sub>2</sub>). The Project site does not contain lands designated as Prime Farmland, Unique Farmland, or Farmland of Statewide or local importance as mapped by the FMMP. There are no existing infrastructure connections to the site and the site does not contain an existing well. Due to the lack of available resources on the site, no agricultural resources would be converted to a non-agricultural use.

As previously discussed, the GPU EIR determined impacts from direct and indirect conversion of agricultural resources to be significant and unavoidable. However, the proposed Project would have less than significant direct and indirect impacts. Therefore, the Project would be consistent with the analysis provided within the GPU EIR.

2(b) The GPU EIR concluded this impact to be less than significant with mitigation. The Project site is zoned A70, a limited agricultural zone. The A70 zone also allows for single-family residential use types. As mentioned above in response 2(a), the site lacks agricultural

resources on site, thus the Project would not conflict with existing zoning for an agricultural use.

The Project site's land is not under a Williamson Act Contract, nor is surrounded by any such land. The closest preserve or Williamson Act Contract is approximately 2.3 miles southeast of the Project site, Therefore the Project would not conflict with a Williamson Act Contract.

As previously discussed, the GPU EIR determined impacts from land use conflicts to be less than significant with mitigation. As the proposed Project would have a less-than-significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 2(c) The GPU EIR concluded this impact to be significant and unavoidable. The project site including any offsite improvements do not contain any forest lands as defined in Public Resources Code section 12220(g), therefore Project implementation would not result in the loss or conversion of forest land to a non-forest use. The outer edge of the Cleveland National Forest is located approximately 1.0 mile to the east of the Project site. Thus, due to distance and intervening land uses, the Project would have no impact on the Forest. In addition, the County of San Diego does not have any existing Timberland Production Zones.

As previously discussed, the GPU EIR determined impacts from direct and indirect conversion of agricultural resources (including forest resources), to be significant and unavoidable. However, the Project would have a less-than-significant impact to forest resources. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 2(d) The GPU EIR concluded this impact to be significant and unavoidable. As indicated in response 2(c), the Project site, or any off-site improvements, are not located within any forest lands. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 2(e) The GPU EIR concluded this impact to be significant and unavoidable. No agricultural operations are currently taking place on the Project site, nor does the site or surrounding area within one-quarter mile contain any active agricultural operations or lands designated as Prime Farmland, Unique Farmland, or Farmland of State or Local Importance as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency. The surrounding area contains Prime candidate soils as identified by the FMMP approximately 0.1 miles to the west, however, these lands are currently developed and have been categorized by the FMMP as Urban Built-up.

As previously discussed, the GPU EIR determined impacts from direct and indirect conversion of agricultural resources (including forest resources) to be significant and unavoidable. However, the proposed Project determined impacts to agricultural resources to be less-than-significant. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

**Conclusion**

With regards to the issue area of Agricultural/Forestry Resources, the following findings can be made:

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. No mitigation measures contained within the GPU EIR would be required because Project specific impacts would be less than significant.

	<b>Significant Project Impact</b>	<b>Impact not identified by GPU EIR</b>	<b>Substantial New Information</b>
<b>3. Air Quality</b> – Would the Project:			
a) Conflict with or obstruct implementation of the San Diego Regional Air Quality Strategy (RAQS) or applicable portions of the State Implementation Plan (SIP)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Create objectionable odors affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**Discussion**

3(a) The GPU EIR concluded this impact to be less than significant. An Air Quality Study was prepared by OB-1 Air Analysis in May 2020 (included in Appendix A). The General Plan designates the Project site as Semi-Rural (SR-1) Residential. The Project, which is to construct private roads, pads, and related infrastructure for 20 single-family residential lots on approximately 81 acres, would be consistent with the General Plan land use designation and density. Because the proposed Project is allowed under the General Plan land use designation, which used San Diego Association of Governments (SANDAG) growth projections, it is consistent with the regional air quality standards (RAQS) and State Implementation Plan (SIP). As such, the Project would not conflict with either the RAQS or the SIP. In addition, the construction and operational emissions from the Project are

anticipated to be below established screening-level thresholds (SLTs), as addressed under Question 3(b), and would not violate any ambient air quality standards.

As previously discussed, the GPU EIR determined impacts on air quality plans to be less than significant. As the proposed Project would have a less-than-significant for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 3(b) The GPU EIR concluded impacts to be significant and unavoidable. In general, air quality impacts from land use projects are the result of emissions from area sources (landscaping and consumer products), energy (natural gas and electricity), transportation (on-road mobile sources), and short-term construction activities. The County of San Diego (County) has established Guidelines for Determining Significance for Air Quality which incorporate the San Diego Air Pollution Control District's (SDAPCD's) established air quality impact analysis SLTs for all new source review (NSR) in SDAPCD Rule 20.2 and Rule 20.3. These SLTs identified in the County Guidelines can be used as numeric methods to demonstrate that a project's total emissions (e.g. stationary and fugitive emissions, as well as emissions from mobile sources) would not result in a significant impact to air quality. SLTs for volatile organic compounds (VOCs) are based on the threshold of significance for VOCs from the South Coast Air Quality Management District (SCAQMD) for the Coachella Valley (which is more appropriate for the San Diego Air Basin).

The Project proposes construction of private roads, pads, and related infrastructure for 20 single-family residential lots. For the purposes of the air quality analysis, Project development was assumed to be completed in two phases with each phase to be completed within 4 to 5 months. Phase 1 would construct 11 single family residential lots and phase 2 would construct the remaining nine single family residential lots. Additional construction details are provided in the Air Quality Study in Appendix A. Emissions from the construction phase would be temporary and localized. Grading operations associated with construction of the Project would require a minimum watering of the Project site two times per day to reduce fugitive dust under the San Diego Air Pollution Control District (SDAPCD) Rule 55 and would be subject to the County of San Diego Grading Ordinance. With the application of fugitive dust control, emissions from construction activities would be below the County SLTs as indicated in Table 1 of the Air Quality Study provided in Appendix A. Therefore, the Project would not violate any air quality standard or contribute substantially to an existing or projected air quality violation during Project construction.

The Project, as proposed, would only include the initial grading and site preparation of the site for future development of single-family homes. The resulting single-family home developments would be individually and privately initiated. For this reason, Project specific operational details are unknown (e.g. single-family home square footage, additional efficiency improvements included in newly constructed homes) and default values for used within the emissions modeling. Daily emissions of criteria pollutants associated with operational mobile, area, and energy sources, were estimated in the Air Quality Study. The Project would generate operational daily emissions at levels below County SLTs. As such, the Project will not violate any air quality standard or contribute substantially to an existing or projected air quality violation during Project operations.

Project construction and operational emissions associated with the proposed residential development are not anticipated to exceed the County's construction and operational SLTs, based on the analysis presented in the Air Quality Study (Appendix A). Therefore,

the Project would not violate any air quality standard or contribute substantially to an existing or projected air quality violation.

As previously discussed, the GPU EIR determined significant and unavoidable impacts to air quality violations. However, the Projects would have a less-than-significant impact to air quality violations with the incorporation of Project conditions. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 3(c) The GPU EIR concluded this impact to be significant and unavoidable. San Diego County is presently in non-attainment for the National and California Ambient Air Quality Standard (NAAQS and CAAQS, respectively) for ozone (O<sub>3</sub>). San Diego County is also presently in non-attainment for concentrations of Particulate Matter less than or equal to 10 microns (PM<sub>10</sub>) and Particulate Matter less than or equal to 2.5 microns (PM<sub>2.5</sub>) under the CAAQS. O<sub>3</sub> is formed when VOCs and oxides of nitrogen (NO<sub>x</sub>) react in the presence of sunlight. VOC sources include any source that burns fuels (e.g., gasoline, natural gas, wood, oil); solvents; petroleum processing and storage; and pesticides. Sources of PM<sub>10</sub> and PM<sub>2.5</sub> in both urban and rural areas include: motor vehicles, wood burning stoves and fireplaces, dust from construction, landfills, agriculture, wildfires, brush/waste burning, and industrial sources of windblown dust from open lands.

The Project would contribute PM<sub>10</sub>, PM<sub>2.5</sub>, NO<sub>x</sub>, and VOC emissions from construction/grading activities; however, the incremental increase would not exceed established SLTs (see Question 3(b) above). Additionally, grading activities associated with construction of the Project would be subject to the County of San Diego Grading Ordinance and the SDAPCD Rule 55, which requires the implementation of dust control measures. The Project would generate PM<sub>10</sub>, PM<sub>2.5</sub>, and NO<sub>x</sub> emissions during Project operations primarily from mobile sources (i.e., vehicle trips), and VOCs from area and mobile sources. Operational emissions would not be anticipated to exceed the County's SLTs.

Cumulative impacts could occur if the most intensive phases of construction for the proposed Project occur simultaneous with other intensive phases of proposed projects in close proximity to the Project. The most intensive construction phase for the Project and for typical developments occurs during earthwork and grading activities. During these phases, the primary criteria pollutant of concern would be PM<sub>10</sub>. As shown in the Air Quality Analysis, the Project's estimated emissions of criteria pollutants, specifically PM<sub>10</sub>, would be relatively low compared to the County's SLTs. Further, due to the highly dispersive nature of particulate matter, a cumulative impact during construction activities would only occur if a project adjacent to the proposed Project undergoes simultaneous grading/earthwork activities and emits significantly greater PM<sub>10</sub> emissions than the Project. Because all projects developed within the County would be required to comply with the County Grading Ordinance and SDAPCD Rule 55, this scenario is not anticipated to occur. However, to avoid any potential cumulative impacts from construction activities, the Project would coordinate with County Staff to ensure the Project's earthwork activities would not occur simultaneously with adjacent earthwork activities, to the extent feasible.

The Project is proposing development that is consistent with the County's General Plan, thus operational air emissions are considered to have been accounted for in the General Plan environmental review. The General Plan was prepared consistent with the RAQS and SIP. Further, as described in under Question 3(b), Project construction and operations would not result in emissions of criteria pollutants greater than the County's SLTs. Thus,

the Project would not result in a cumulatively considerable net increase in criteria pollutants for which the region is currently in non-attainment.

As previously discussed, the GPU EIR determined significant and unavoidable impacts to non-attainment criteria pollutants. However, the Project would have a less than significant impact to non-attainment criteria pollutants. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 3(d) The GPU EIR concluded this impact to be significant and unavoidable. Air quality regulators typically define sensitive receptors as schools (Preschool – 12<sup>th</sup> Grade), hospitals, resident care facilities, day-care centers, residences, or other facilities that may house individuals with health conditions that would be adversely impacted by changes in air quality. Because the Project proposes residential land uses, the proposed Project would not be considered a point-source of significant emissions.

The closest sensitive receptor to the Project site is the existing residential unit located approximately 200 feet from pad numbers 1 and 9 in Phase 1 and Pad number 18 in Phase 2.. The Project would generate construction emissions in the vicinity of sensitive receptors. Diesel particulate matter (DPM) is the primary toxic air contaminant (TAC) of concern and is generated from grading activities and fuel consumption in heavy construction equipment. Abidance to the County of San Diego Grading Ordinance and SDAPCD Rule 55 would reduce fugitive dust and DPM emissions, and exposure to construction emissions would be temporary. Furthermore, as indicated in Question 3(b), NAAQS and CAAQS would not be exceeded during construction activities for particulate matter. Future operations of the residential uses would not generally be associated with emissions of TACs and is consistent with the surrounding land uses.

The Project is located just north of Interstate 8 which has the potential to expose the new sensitive receptors to pollutants from vehicle exhaust emissions. The Project would result in the future development of 20 single-family homes. This future use is similar to the residential land uses surrounding the site. As discussed in Question 3(a) the proposed site is consistent with the General Plan land use designation, and the RAQS and SIP. The thresholds set for these plans were identified to reduce unhealthy concentrations of harmful pollutants.

The Project is not anticipated to result in a significant amount of TAC emissions during construction activities that could impact nearby sensitive receptors. Additionally, the future operations of the Project would not generally be associated with TACs and is consistent with the General Plan land use designation and the surrounding land uses. Thus, the Project would not expose sensitive receptors to substantial pollutant concentrations.

As previously discussed, the GPU EIR determined significant and unavoidable impacts to sensitive receptors. However, the Project would have a less than significant impact to sensitive receptors. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 3(e) The Project could produce objectionable odors during construction from paving, painting, and heavy equipment operation; however, these substances, if present at all, would be minimal and temporary. Furthermore, the Project would be subject to SDAPCD Rule 51, Nuisance Rule, which prohibits emissions of any material that causes nuisance to a considerable number of persons or endangers the comfort, health, or safety of any person.

The Project would result in the future development of single-family homes which are not generally associated with the generation of objectionable odors. Thus, the Project would not create objectionable odors affecting a substantial number of people during construction activities or operations.

As previously discussed, the GPU EIR determined less than significant impacts from objectionable odors. As the proposed Project would have a less-than-significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

**Conclusion**

With regards to the issue area of Air Quality, the following findings can be made:

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. No mitigation measures contained within the GPU EIR would be required because Project specific impacts would be less than significant.

<b>Significant Project Impact</b>	<b>Impact not identified by GPU EIR</b>	<b>Substantial New Information</b>
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**4. Biological Resources – Would the Project:**

a) Have a substantial adverse effect, either directly or through habitat modifications, on any candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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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"/>
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d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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corridors, or impede the use of native wildlife nursery sites?

e) Conflict with the provisions of any adopted Habitat Conservation Plan, Natural Communities Conservation Plan, other approved local, regional or state habitat conservation plan or any other local policies or ordinances that protect biological resources?

**Discussion**

A Biological Resources Letter Report was prepared for the Project dated May 15<sup>th</sup>, 2020 by Cummings Environmental Inc.

4(a) The GPU EIR concluded this impact to be significant and unavoidable. Biological resources on the Project site were evaluated in a Biological Resources Letter Report prepared by Cummings Environmental Inc, dated May 15, 2020. The site contains granitic southern mixed chaparral, southern coast live oak riparian forest, coast live oak woodland, open water, and disturbed habitats. As a result of the Project, permanent impacts would occur to 38.4 acres of granitic southern mixed chaparral, 0.3 acres of southern coast live oak riparian forest, 0.3 acres of coast live oak woodland, and 0.22 acres of developed habitat. In addition, 150 square feet of permanent impacts would occur to waters of the U.S./waters of the state and 1,800 square feet of temporary impacts would occur to federal jurisdictional wetlands and waters of the state. Additionally, the following sensitive wildlife species were identified on site: Orange-throated Whiptail (*Aspidoscelis hyperythra*), Coastal Western Whiptail (*Aspidoscelis tigris stejnegeri*), San Diego Horned Lizard (*Phrynosoma blainvillii*), Cooper’s Hawk (*Accipiter cooperi*), Rufous-crowned Sparrow (*Aimophila ruficeps* ssp. *Canescens*), and the Western Bluebird (*Sialia Mexicana*). Sensitive plant species identified onsite are Engelmann Oak (*Quercus engelmannii*), San Diego Sagewort (*Artemisia palmeri*), Chaparral Rein-Orchid (*Piperia cooperi*), Palmer’s Grappling Hook (*Harpagonella palmeri*), and Fish’s Milkwort (*Polygala cornuta* var. *fishiae*). The site is located within the County’s Multiple Species Conservation Program (MSCP) but is not designated as a Pre-approved Mitigation Area (PAMA) or a Biological Resource Core Area (BRCA).

As considered by the GPU EIR, Project impacts to sensitive habitat and/or species will be mitigated through ordinance compliance and through implementation of the following mitigation measures: offsite purchase of 19.2 acres of Tier III habitat and 0.3 acres of Tier I habitat within a BRCA in the MSCP, the dedication of an open space easement over the identified on-site RPO wetlands and buffers, creation and restoration of 0.6 acres of southern coast live oak riparian forest habitat, the removal of an earthen dam to restore natural flow, and implementation of breeding season avoidance to prevent brushing, clearing, and/or grading between January 15<sup>th</sup> and August 31<sup>st</sup>. The GPU EIR identified these mitigation measures as Bio 1.6 and Bio 1.7.

As previously discussed, the GPU EIR determined impacts to special status species as significant and unavoidable. However, the Project determined impacts to be less than significant with the incorporation of mitigation consistent with GPU EIR mitigation measures Bio 1.6 and Bio 1.7. Therefore, the Project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.



- 4(b) The GPU EIR concluded this impacts to be significant and unavoidable. Based on the Biological Resources report, the Project site contains wetlands and jurisdictional waters. The following sensitive habitats were identified on the site: granitic southern mixed chaparral, southern coast live oak riparian forest, coast live oak woodland, and open water. As detailed in response 4(a) above, direct and indirect impacts to sensitive natural communities identified in the RPO, NCCP, Fish and Wildlife Code, and Endangered Species Act would require mitigation to reduce impacts to a less than significant level.

As considered by the GPU EIR, Project impacts to sensitive habitat and/or species will be mitigated through ordinance compliance and through implementation of the following mitigation measures: offsite purchase of 19.2 acres of Tier III habitat and 0.3 acres of Tier I habitat within a BRCA in the MSCP, dedication of an open space easement over the RPO wetlands and buffers, creation and restoration of 0.6 acres of southern coast live oak riparian forest habitat, removal of an earthen dam to restore natural flow, and implementation of breeding season avoidance to prevent brushing, clearing, and/or grading between January 15<sup>th</sup> and August 31<sup>st</sup>. The GPU EIR identified these mitigation measures as Bio 1.6 and Bio 1.7.

As previously discussed, the GPU EIR determined impacts to riparian habitat and other sensitive natural communities as significant and unavoidable. However, the proposed Project's impacts would be less than significant with the implementation of mitigation consistent with GPU EIR mitigation measures Bio 1.6 and 1.7. Therefore, the Project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 4(c) The GPU EIR concluded this impact to be less than significant with mitigation. Based on the Biological Resources report, the Project site contains federally protected wetlands defined by Section 404 of the Clean Water Act that include southern coast live oak riparian forest habitat. Permanent impacts from Project implementation would occur to 150-square feet of waters of the U.S./waters of the state and temporary impacts would occur to 1,800-square feet of jurisdictions wetlands/waters of the state. Impacts to federally protected wetlands will be mitigated at a minimum of a 1:1 ratio by removing an existing earthen dam and recontouring the area to its pre-berm, natural flows.

As previously discussed, the GPU EIR determined impacts to federally protected wetlands as less than significant with mitigation. However, the proposed Project determined impacts would be less than significant with implementation of Project conditions consistent with GPU EIR mitigation measures Bio 1.6 and Bio 2.2. Therefore, the Project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 4(d) The GPU EIR concluded this impact to be significant and unavoidable. Based on a GIS analysis by County staff and the Biological Resources Report prepared for the Project, the site is not part of a regional linkage/corridor as identified on County of San Diego MSCP maps, nor is it in an area considered regionally important for wildlife dispersal. Wildlife has the ability to move through the drainages onsite where there is water and canopy cover. However, the site would not substantially assist in local wildlife movement as it lacks connectivity offsite due to the site being surrounded by development.

As previously discussed, the GPU EIR determined impacts to wildlife movement corridors as significant and unavoidable. However, the Project impacts were determined to be less

than significant for the reasons detailed above. Therefore, the Project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 4(e) The GPU EIR concluded this impact to be less than significant. The Project is consistent with the County’s Multiple Species Conservation Program (MSCP), Biological Mitigation Ordinance (BMO), and Resource Protection Ordinance (RPO) as demonstrated in the MSCP Conformance Findings dated May 19, 2020. The Project will not conflict with the provisions of any adopted Habitat Conservation Plan, Natural Communities Conservation Pan, other approved local, regional or state habitat conservation plan, or any other local policies or ordinances that protect biological resources.

As previously discussed, the GPU EIR determined impacts on local policies and ordinances as well as habitat conservation plans and natural community conservation plans as less than significant. As the proposed Project would have a less-than-significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

**Conclusion**

With regards to the issue area of Biological Resources, the following findings can be made:

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 (Bio 1.6, and Bio 1.7) would be applied to the Project.

<b>Significant Project Impact</b>	<b>Impact not identified by GPU EIR</b>	<b>Substantial New Information</b>
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**5. Cultural Resources – Would the Project:**

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 type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Directly or indirectly destroy a unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Directly or indirectly destroy a unique paleontological resource or site?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

## Discussion

- 5(a) The GPU EIR concluded this impact to be less than significant with mitigation. Based on an analysis of records and a survey of the property by County approved archaeologist Mary Robbins-Wade, 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, "Cultural Resources Survey Report – Negative Findings, Alpine 21 Project, Alpine, San Diego County, California, PDS2005-3100-5431", prepared by Mary Robbins-Wade and Nicole Falvey, dated June 2019.

As previously discussed, the GPU EIR determined impacts on historic resources to be less than significant with mitigation. The proposed Project determined impacts on historic resources to be less than significant. Therefore, the Project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 5(b) The GPU EIR concluded this impact to be less than significant with mitigation. Based on an analysis of records and a survey of the property by County approved archaeologist Mary Robbins-Wade, 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, "Cultural Resources Survey Report – Negative Findings, Alpine 21 Project, Alpine, San Diego County, California, PDS2005-3100-5431", prepared by Mary Robbins-Wade and Nicole Falvey, dated June 2019.

In addition, the Native American Heritage Commission (NAHC) was contacted for a listing of Native American Tribes whose ancestral lands may be impacted by the project. The NAHC response was received on April 18, 2016, indicating no sacred sites, on record with the commission, were present on the project property. Frank Tesam of the Viejas Band provided Kumeyaay Native American monitoring during the survey.

Although no resources were identified during site surveys, the potential exists for subsurface deposits because of dense vegetative cover on portions of the property which limited ground visibility. As such, an Archaeological Monitoring Program will be made a condition of approval.

As considered by the GPU EIR, potential impacts to cultural resources will be mitigated through ordinance compliance and through implementation of the following mitigation measures: grading monitoring under the supervision of a County-approved archaeologist and a Native American monitor and conformance with the County's Cultural Resource Guidelines if resources are encountered. The GPU EIR identified these mitigation measures as Cul 2.5. The project will be conditioned with archaeological monitoring (Cul-2.5) that includes the following requirements:

- Pre-Construction
  - Contract with a County approved archaeologist to perform archaeological monitoring and a potential data recovery program during all earth-disturbing activities. The Project Archaeologist shall perform the monitoring duties before, during and after construction.
  - Pre-construction meeting to be attended by the Project Archaeologist and Kumeyaay Native American monitor to explain the monitoring requirements.

- Construction
  - Monitoring. Both the Project Archaeologist and Kumeyaay Native American monitor are to be onsite during earth disturbing activities. The frequency and location of monitoring of native soils will be determined by the Project Archaeologist in consultation with the Kumeyaay Native American monitor. Both the Project Archaeologist and Kumeyaay Native American monitor will evaluate fill soils to ensure that they are negative for cultural resources
  - If cultural resources are identified:
    - Both the Project Archaeologist and Kumeyaay Native American monitor have the authority to divert or temporarily halt ground disturbance operations in the area of the discovery.
    - The Project Archaeologist shall contact the County Archaeologist at the time of discovery.
    - The Project Archaeologist in consultation with the County Archaeologist and Kumeyaay Native American shall determine the significance of discovered resources.
    - Construction activities will be allowed to resume after the County Archaeologist has concurred with the significance evaluation.
    - Isolates and non-significant deposits shall be minimally documented in the field. Should the isolates and non-significant deposits not be collected by the Project Archaeologist, the Kumeyaay Native American monitor may collect the cultural material for transfer to a Tribal curation facility or repatriation program.
    - If cultural resources are determined to be significant, a Research Design and Data Recovery Program shall be prepared by the Project Archaeologist in consultation with the Kumeyaay Native American monitor and approved by the County Archaeologist. The program shall include reasonable efforts to preserve (avoid) unique cultural resources of Sacred Sites; the capping of identified Sacred Sites or unique cultural resources and placement of development over the cap if avoidance is infeasible; and data recovery for non-unique cultural resources. The preferred option is preservation (avoidance).
  - Human Remains.
    - The Property Owner or their representative shall contact the County Coroner and the PDS Staff Archaeologist.
    - Upon identification of human remains, no further disturbance shall occur in the area of the find until the County Coroner has made the necessary findings as to origin. If the human remains are to be taken offsite for evaluation, they shall be accompanied by the Kumeyaay Native American monitor.
    - If the remains are determined to be of Native American origin, the Most Likely Descendant (MLD), as identified by the Native American Heritage Commission (NAHC), shall be contacted by the Property Owner or their representative in order to determine proper treatment and disposition of the remains.
    - The 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
  - Monitoring Report. Upon completion of Rough Grading, a monitoring report shall be prepared identifying whether resources were encountered. A copy of the monitoring report shall be provided to the South Coastal Information Center and any culturally-affiliated tribe who requests a copy.
- Final Grading
  - Final Report. A final report shall be prepared substantiating that earth-disturbing activities are completed and whether cultural resources were encountered. A copy of the final report shall be submitted to the South Coastal Information Center, and any culturally-affiliated tribe who requests a copy.
  - Cultural Material Conveyance
    - The final report shall include evidence that all prehistoric materials have been curated at a San Diego curation facility or Tribal curation facility that meets federal standards per 36 CFR Part 79, or alternatively have been repatriated to a culturally affiliated tribe.
    - The final report shall include evidence that all historic materials have been curated at a San Diego curation facility that meets federal standards per 36 CFR Part 79.

As previously discussed, the GPU EIR determined impacts to archaeological resources as less than significant with mitigation. The Project determined impacts to archaeological resources as potentially significant. However, the Project would incorporate the GPU EIR mitigation measure Cul-2.5 for a less than significant impact with mitigation. Therefore, the Project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 5(c) The GPU EIR concluded this impact to be less than significant. 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.

As previously discussed, the GPU EIR determined impacts on unique geologic features as less than significant. As the Project would have a less-than-significant impacts for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 5(d) The GPU EIR concluded this impact to be less than significant with mitigation. A review of the County's Paleontological Resources Maps and data on San Diego County's geologic formations indicates that the project is not located on geological formations (Cretaceous Plutonic) that potentially contain unique paleontological resources. As such, the project does not have the potential to impact fossil deposits and mitigation is not required.

As previously discussed, the GPU EIR determined impacts on paleontological resources as less than significant with mitigation. The proposed Project determined impacts to paleontological resources to be less than significant. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 5(e) The GPU EIR concluded this impact to be less than significant with mitigation. 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.

As previously discussed, the GPU EIR determined impacts to human remains as less than significant with mitigation. the proposed Project would incorporate the GPU EIR mitigation measures for monitoring (Cul-2.5) for a less than significant impact with mitigation. Therefore, the Project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

**Conclusion**

With regards to the issue area of cultural/paleontological resources, the following findings can be made:

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-2.5) would be applied to the Project.

<b>Significant Project Impact</b>	<b>Impact not identified by GPU EIR</b>	<b>Substantial New Information</b>
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**6. Energy Use** – Would the Project:

- |   |                          |                          |                          |
|---|--------------------------|--------------------------|--------------------------|
| a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

**Discussion**

Energy use was not specifically analyzed within the GPU EIR as a separate issue area under CEQA. At the time, Energy Use was contained within Appendix F of the CEQA Guidelines and since then has been moved to the issue areas within Appendix G of the CEQA Guidelines. However, the issue of energy use in general was discussed within the GPU and the GPU EIR. For example, within the Conservation and Open Space Element of the GPU, Goal COS-15 promotes sustainable architecture and building techniques that reduce emissions of criteria pollutants and GHGs, while protecting public health and contributing to a more sustainable environment. Policies, COS-15.1, COS-15.2, and COS-15.3 would support this goal by encouraging design and construction of new buildings and upgrades of existing buildings to maximize energy efficiency and reduce GHG. Goal COS-17 promotes sustainable solid waste management. Policies COS-17.1 and COS-17.5 would support this goal by reducing GHG emissions through waste reduction techniques and methane recapture. The analysis below specifically analyzes the energy use of the Project.

- 6(a) The Project would increase the demand for electricity and natural gas at the Project site and gasoline consumption at the Project site during construction and operation, relative to existing conditions. CEQA requires mitigation measures to reduce “wasteful, inefficient and unnecessary” energy usages (Public Resources Code Section 21100, subdivision [b][3]). Neither the law nor the State CEQA Guidelines establish criteria that define wasteful, inefficient, or unnecessary use. Compliance with the California Code of Regulations 2019 Title 24 Part 6 Building Code would result in highly energy-efficient buildings. However, compliance with building codes does not adequately address all potential energy impacts during construction and operation. The Project includes the subdivision of an 80.7-acre parcel into 20 residential lots with associated site improvements. It can be expected that energy consumption, outside of the building code regulations, would occur through the transport of construction materials to and from the site during the construction phase, the use of personal vehicles by residents, and the operation of delivery vehicles to service the future residential units.

#### Grading and Construction

During the grading and construction phases of the Project, the primary energy source utilized would be petroleum from construction equipment and vehicle trips. To a lesser extent, electricity would also be consumed for the temporary electric power for as-necessary lighting and electronic equipment. Activities including electricity would be temporary and negligible; therefore, electricity use during grading and construction would not result in wasteful, inefficient, or unnecessary consumption of energy.

The energy needs for the Project construction would be temporary and is not anticipated to require additional capacity or increase peak or base period demands for electricity or other forms of energy. Construction equipment use and associated energy consumptions would be typical of that associated with the construction of residential projects of this size in a semi-rural setting. Additionally, The Project is consistent with the General Plan and Zoning Ordinance. Thus, the Project’s energy consumption during the grading and construction phase would not be considered wasteful, inefficient, or unnecessary.

#### Operational

Operation of the Project would be typical of residential land uses requiring natural gas for space heating and landscape maintenance activities. The Project will utilize electric or alternatively fueled water heating. The Project would meet the California Code of Regulations Title 24 Standards for energy efficiency that are in effect at the time of construction. Additionally, the Project would provide numerous sustainability features that would reduce transportation and building energy consumption and increase the efficient use of water.

The Project would generate approximately 252 average daily trips (ADT), as described in the Focused Traffic Impact Study, dated August 28, 2017, was prepared by LOS Engineering, Inc. Therefore, the Project would not be expected to result in wasteful, inefficient, or unnecessary petroleum usage throughout Project operations.

Over the lifetime of the proposed Project, fuel efficiency of vehicles is expected to increase as older vehicles are replaced with newer, more efficient models. As such, the amount of petroleum consumed as a result of vehicles trips to and from the Project site during operation would decrease over time. State and Federal regulations regarding standards for vehicles (e.g. Advanced Clean Cars Program, CAFÉ Standards) are designed to reduce wasteful, unnecessary, and inefficient use of fuel. The coupling of various State

policies and regulations such as the Zero-Emission Vehicles Mandate and Senate Bill 350 would result in the deployment of electric vehicle which would be powered by an increasingly renewable electrical grid. These actions would reduce energy use compared to other similar Projects consistent with the General Plan.

The Project would use electricity for lighting and appliances associated with future single-family residential uses on-site. The Project would be required to meet Title 24 of the California Building Code, which establishes energy efficiency standards for buildings to reduce energy demand and consumption. The Project is consistent with the General Plan and would not be expected to result in wasteful, inefficient, or unnecessary electric energy usage throughout Project operations.

As previously discussed, the GPU EIR did not analyze Energy as a separate issue area under CEQA. Energy was analyzed under the GPU and GPU EIR and has been incorporated within General Plan Elements. The Project would not conflict with policies with the GPU related to energy use, nor would it result in the wasteful, inefficient, or unnecessary consumption of energy resources, as specified within Appendix G of the CEQA Guidelines.

6(b) Many of the regulations regarding energy efficiency are focused on increasing the energy efficiency of buildings and renewable energy generation, as well as reducing water consumption and reliance on fossil fuels. The proposed Project includes the following energy conservation measures:

- Compliance with County's Water Conservation in Landscaping Ordinance, demonstrating a 40% reduction in outdoor use which would reduce energy required for water conveyance;
- Install low flow indoor water fixtures in all residential units, reducing water consumption in associated energy required for water conveyance.

The County's Climate Action Plan is a long-term plan that identifies strategies and measures to meet the County's targets to reduce GHG emissions by 2020 and 2030, consistent with the State's legislative GHG reduction targets, and demonstrates progress towards the State's 2050 GHG reduction goal (County of San Diego, 2017). Implementation of the CAP requires that new development Projects incorporate more sustainable design standards and implement applicable reduction measures consistent with the CAP. To help streamline this review and determine consistency of proposed Projects with the CAP during development review, the County has prepared a CAP Consistency Review Checklist (Checklist). The Project would implement all applicable measures identified in the Checklist and would therefore be consistent with the County's Climate Action Plan. In addition, the Project would be consistent with energy reduction policies of the County General Plan including policy COS-14.1. Additionally, the Project would be consistent with sustainable development and energy reduction policies such as policy COS-15.4, through compliance with the most recent Title 24 standards at the time of Project construction. Therefore, the proposed Project would implement energy reduction design features and comply with the most recent energy building standards consistent with applicable plans and policies. Therefore, the proposed Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

As previously discussed, the GPU EIR did not analyze Energy as a separate issue area under CEQA. Energy was analyzed under the GPU and GPU EIR and has been incorporated



within General Plan Elements. The Project would not conflict with policies within the GPU related to energy use or conflict with or obstruct a state or local plan for renewable energy or energy efficiency as specified within Appendix G of the CEQA Guidelines.

**Conclusion**

With regards to the issue area of Energy, the following findings can be made:

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. No mitigation measures contained within the GPU EIR would be required because Project specific impacts would be less than significant.

**7. Geology and Soils – Would the Project:**

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving: (i) rupture of a known earthquake fault, (ii) strong seismic ground shaking or seismic-related ground failure, (iii) liquefaction, and/or (iv) 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**

The following technical reports have been prepared for the proposed Project related to geology and soils:

1. A Report of Limited Geotechnical Investigation dated August 19<sup>th</sup>, 2016, prepared by C.W. La Monte Company, Inc.
2. A Landslide/Rockfall Hazards assessment dated November 12<sup>th</sup>, 2019, prepared by C.W. La Monte Company, Inc.

7(a)(i) The GPU EIR concluded this impact to be less than significant. 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 on any known active, potentially active, or inactive fault traces. The Elsinore Fault Zone is the nearest known active fault and is located approximately 18 miles northeast of the Project site.

- 7(a)(ii) The GPU EIR concluded this impact to be less than significant. 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. In addition, a soils compaction report with proposed foundation recommendation would be required to be approved before the issuance of a building permit for site improvements and future residences and residential uses associated with the proposed Project. Therefore, compliance with the California Building Code and the County Building Code would ensure that the Project would not result in a significant impact.
- 7(a)(iii) The GPU EIR concluded this impact to be less than significant. The Project site is not within a "Potential Liquefaction Area" as identified in the County Guidelines for Determining Significance for Geologic Hazards. A Limited Geotechnical Investigation for the Project prepared by C.W. La Monte Company, Inc. dated August 19<sup>th</sup>, 2016 indicated that the materials in the area of the site to be developed have a low potential for liquefaction to occur due to soil density, grain size distribution, and groundwater conditions. Therefore, there would be no potentially significant impact from the exposure of people or structures to adverse effects from a known area susceptible to ground failure, including liquefaction.
- 7(a)(iv) The GPU EIR concluded this impact to be less than significant. The Project site is not located within a "Landslide Susceptibility Area" as identified in the County Guidelines for Determining Significance for Geologic Hazards. Additionally, the Limited Geotechnical Investigation prepared for the Project found that no known deep or suspected ancient landslides are located on the site.

The Project site is moderately sloped, with elevations on site ranging from 2,325 feet aMSL in the northeast corner of the Project site to 1948 feet aMSL at the west central edge of the site. Pursuant to the Landslides/ Rockfall Hazards assessment prepared for the Project by C.W. La Monte, Inc, dated November 12<sup>th</sup>, 2019 the Project site contains a number of major surface rock outcrop areas that have a potential for rockfall occurrence during the lifetime of the proposed Project improvements.

The project includes conditions of approval that have been utilized in similar projects in order to avoid the potential of rockfall hazards. A geotechnical consultant in the field shall perform mapping of all cut slopes during grading and prepare a certified report on all required stabilization measures implemented during grading. The findings shall be reviewed and approved by the Director of the County Department of Planning and Development Services or designee.

In addition, all boulders located within the proposed development footprint shall be removed during grading. Boulders affecting the locations identified in the Rockfall Hazards Map dated November 12, 2019 as High Potential for Rockfall and requires standard measures to ensure safety. The boulders shall either be removed, broken in place, or accounted for with catchments. A written opinion from California Certified Engineering Geologist shall be provided that indicates that the proposed development shall be safe for human occupancy.

As previously discussed, the GPU EIR determined less than significant impacts from exposure to seismic-related hazards and soil stability. As the proposed Project would have

a less-than-significant impact, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 7(b) The GPU EIR concluded this impact to be less than significant. The soils on-site have been identified as entisols that have a soil erodibility rating of severe. According to the Limited Geotechnical Investigation prepared for the Project August 19<sup>th</sup>, 2016 by C.W. La Monte Company, Inc, the Project site is underlain by competent decomposed granitic bedrock with associated surficial slope wash. However, the Project will not result in substantial soil erosion or the loss of topsoil because the Project will be required to comply with the Watershed Protection Ordinance (WPO) and Grading Ordinance, which will ensure that the Project would not result in any unprotected erodible soils, will not significantly 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.

As previously discussed, the GPU EIR determined impacts from soil erosion and topsoil loss to be less than significant. As the Project would have a less-than-significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 7(c) The GPU EIR concluded this impact to be less than significant As indicated in response (a)(iv), the site is not located within a “Landslide Susceptibility Area” as identified in the County Guidelines for Determining Significance for Geologic Hazards, however the Investigation found that no known deep or suspected ancient landslides are located on the site. The proposed Project involves earthwork including the cut of 50,018 cubic yards, 57,795 cubic yards of fill, and import of 7,777 cubic yards of fill that would result in the creation of areas of cut and areas underlain by fill. In order to assure that any future buildings or on-site infrastructure are adequately supported, a Soils Engineering Report is required as part of the Building Permit process. This Report would evaluate the strength of underlying soils and make recommendations on the design of building foundation systems. The Soils Engineering Report must demonstrate that a proposed building meets the structural stability standards required by the California Building Code. The report must be approved by the County prior to the issuance of a Building Permit. With this standard requirement, impacts would be less than significant.

As previously discussed, the GPU EIR determined impacts from soil stability to be less than significant. As the proposed Project would have a less-than-significant impact the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 7(d) The GPU EIR determined impacts from expansive soils to be less than significant. According to the Geotechnical Investigation has been prepared for the Project August 19<sup>th</sup>, 2016 by C.W. La Monte Company, Inc, the soils underlying the site are considered to possess a low to very low expansive potential. As a standard project condition, the project would be required to submit a soils report by a California Certified Engineering Geologist prior to grading. The soils report is required to include a surficial stability analysis with design recommendations. All geotechnical recommendations provided in the soils report would be followed during grading and construction of the project.

As previously discussed, the GPU EIR determined impacts from expansive soils to be less than significant. As the Project would have a less-than-significant impact with the

incorporation of standard project conditions, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 7(e) The GPU EIR concluded this impact to be less than significant. The Project would rely on conventional leach lines or supplemental treatment systems which would require approval by the County Department of Environmental Health (DEH) prior to issuance of building permits for residential structures. As such, the Project would not place septic tanks or alternative wastewater disposal systems on soils incapable of adequately supporting the tanks or system.

As previously discussed, the GPU EIR determined impacts to wastewater disposal systems to be less than significant. As the proposed Project would have a less-than-significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

**Conclusion**

With regards to the issue area of Geology and Soils, the following findings can be made:

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. No mitigation measures contained within the GPU EIR would be required because Project specific impacts would be less than significant by adhering to the Project conditions of approval, which are consistent with the GPU EIR.

**8. Greenhouse Gas Emissions – Would the Project:**

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

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

**Background on CAP and Litigation**

The County of San Diego adopted a Climate Action Plan on February 14, 2018 which outlines actions that the County will undertake to meet its greenhouse gas (GHG) emissions reductions targets. Implementation of the CAP requires, among other things, that new development Projects incorporate more sustainable design standards and implement applicable reduction measures consistent with the CAP.

**Discussion**

**Analysis**

8(a) The GPU EIR concluded this impact to be less than significant with mitigation. The Project would generate greenhouse gas (GHG) emissions through construction activities, vehicle trips, and on-site operational activities. However, the Project is consistent with the County of San Diego's Climate Action Plan (CAP), thus would result in a less than cumulatively considerable impact related to GHG emissions.

The County of San Diego adopted a CAP on February 14, 2018 which outlines actions that the County will undertake to meet its GHG emissions reductions targets. Implementation of the CAP requires that new development projects incorporate more sustainable design standards and implement applicable reduction measures consistent with the CAP. The County adopted a CAP to establish a streamlined review process for proposed development projects to determine consistency with the County General Plan and its growth projections. To determine consistency with the CAP and General Plan, the project was evaluated using the CAP Consistency Review Checklist (Checklist). Thus, if the project is consistent with the Checklist then it is consistent with the County's General Plan and CAP.

The Checklist contains two steps: (1) Land Use Consistency; and (2) CAP Measures Consistency. The primary purpose of the Project is to prepare the existing sites for the future, privately initiated, single-family homes. All future single-family homes developed on the site would be required to comply with applicable measures outlined in the Checklist. The applicable measures for which each future single-family home will be required to incorporate into project designs include:

- Water Heating Systems: Although the specific development details are unknown, each single-family home will install solar thermal, tankless electric, storage electric, electric heat pumps, or tankless gas water heaters.
- Water-Efficient Appliances and Plumbing Fixtures: Each single-family home will install water efficient kitchen faucets with a maximum flow rate of 1.5 gallons per minute at 60 psi. Temporary increases in kitchen faucets would not exceed 2.2 gallons per minute at 60 psi. In addition, each single-family home will install at least one qualified ENERGY STAR dishwasher or clothes washer per residential unit.
- Rain Barrel Installation: Each single-family home will install one rain barrel per every 500 square feet of available roof space unless State, regional, or local incentives/rebates are not available; or if funding for programs/rebates have been exhausted.
- Reduce Outdoor Water Use: Each single-family home will comply with the County's Water Conservation in Landscaping Ordinance by submitting a landscape documentation package which is required to demonstrate a 40 percent reduction in outdoor water use.
- Tree Planting: At least two trees per residential unit will be planted to act as tree wells to mitigate stormwater impacts.

As previously discussed, the GPU EIR determined impacts to be less than significant with mitigation. As the Project would have a less-than-significant impact with the incorporation of project design features for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

8(b) The GPU EIR concluded this impact to be less than significant. The Project is consistent with the General Plan land use designation Semi-Rural (SR-1) Residential which allows

for residential densities of up to one dwelling unit per four gross acres dependent on property slopes. The Project is consistent with the land use assumptions and Project growth assumed in the General Plan.

As described above in discussion item 8(a), the Project would not result in a cumulatively considerable contribution to global climate change as it is consistent with the County's General Plan and CAP, which were developed to support the goals and requirements of State legislation and recommendations to reduce emissions of GHGs. Thus, the Project would not conflict with any applicable plan, policy or regulation adopted for the purpose of reducing GHG emissions.

As previously discussed, the GPU EIR determined impacts to applicable regulation compliance to be less than significant. As the proposed Project would have a less-than-significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

### **Conclusion**

With regards to the issue area of Global Climate Change, the following findings can be made:

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. No mitigation measures contained within the GPU EIR would be required because Project specific impacts would be less than significant.

<b>Significant Project Impact</b>	<b>Impact not identified by GPU EIR</b>	<b>Substantial New Information</b>
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**9. Hazards and Hazardous Materials – Would the Project:**

- |  |                          |                          |                          |
|--|--------------------------|--------------------------|--------------------------|
| <p>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?</p>                    | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| <p>b) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?</p>   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| <p>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?</p> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| <p>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?</p>  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| <p>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?</p>   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| <p>f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?</p>   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| <p>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?</p>  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| <p>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?</p>          | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

## Discussion

- 9(a) The GPU EIR concluded this impact to be less than significant. The Project would not create a significant hazard to the public or the environment because it does not propose the storage, use, transport, emission, or disposal of Hazardous Substances, nor are Hazardous Substances proposed or currently in use in the immediate vicinity. In addition, the project does not propose to demolish any existing structures onsite which could produce a hazard related to the release of asbestos, lead based paint or other hazardous materials.

As previously discussed, the GPU EIR determined impacts from transport, use and disposal of hazardous materials and accidental release of hazardous materials to be less than significant. As the proposed Project would have a less-than-significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 9(b) The GPU EIR concluded this impact to be less than significant. The project is not located within one-quarter mile of an existing or proposed school. As previously discussed, the GPU EIR determined impacts from hazards to schools to be less than significant. As the proposed Project would have a less-than-significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 9(c) The GPU EIR concluded this impact to be less than significant. 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.

As previously discussed, the GPU EIR determined impacts from existing hazardous materials sites to be less than significant. As the proposed Project would have a less-than-significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 9(d) The GPU EIR concluded this impact to be less than significant with mitigation. The Project is not located within an Airport Land Use Compatibility Plan (ALUCP) for airports. Additionally, the site is not located within an FAA Notification Zone or Airport Influence Area. Also, the Project does not propose construction of any structure equal to or greater than 15- feet in height, constituting a safety hazard to airport and/ or operations from an airport or heliport. Therefore, the Project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

As previously discussed, the GPU EIR determined impacts on public airports to be less than significant. As the proposed Project would have a less-than-significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 9(e) The GPU EIR concluded this impact to be less than significant with mitigation. The proposed Project is not within one mile of a private airstrip. Therefore, the Project would



be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

9(f)(i) OPERATIONAL AREA EMERGENCY PLAN AND MULTI-JURISDICTIONAL HAZARD MITIGATION PLAN:

The GPU EIR concluded this impact to be less than significant with mitigation. The Project would not interfere with this plan because it would not prohibit subsequent plans from being established or prevent the goals and objectives of existing plans from being carried out.

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

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

9(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.

9f)(v) DAM EVACUATION PLAN: The project is not located within a dam inundation zone.

9(g) The GPU EIR concluded this impact as significant and unavoidable. A Fire Service Availability Letter dated May 6<sup>th</sup>, 2020 and conditions dated May 6<sup>th</sup>, 2020 have been received from the Alpine Fire Protection District (AFPD). The conditions from the AFPD include minimum road dimensions, surface requirements, minimum turning radius, dead end road lengths, no parking signage, roadway design features, roadway maintenance agreement, minimum water supply for fire hydrants, fire sprinklers, fuel modification zones, and the preparation of a fire protection plan, all subject to review and approval by the AFPD. The Fire Service Availability Letter indicated the site location is approximately 1.8 miles from AFPD Station #17. The expected emergency travel time to the Project site is approximately 3.5 minutes.

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 for the 16 Fire Protection Districts in San Diego County. Implementation of these fire safety standards will occur during the Tentative Map, grading, and/or building permit process. Therefore, based on the location of the project and review of the project by County staff, through compliance with the Consolidated Fire Code and through compliance with the AFPD conditions, the project is not anticipated to expose people or structures to a significant risk of loss, injury or death involving hazardous wildland fires. Moreover, the project will not contribute to a cumulatively considerable impact, because all past, present and future projects in the surrounding area are required to comply with the Consolidated Fire Code.

As previously discussed, the GPU EIR determined impacts from wildland fires to be significant and unavoidable. However, the proposed Project would have a less-than-significant impact with no required mitigation for the reasons detailed above. Therefore,

the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

9(h) The GPU EIR concluded this impact as less than significant. 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. there are none of these uses on adjacent properties. Therefore, the project will not substantially increase current or future resident’s exposure to vectors, including mosquitoes, rats or flies.

As previously discussed, the GPU EIR determined less than significant impacts with mitigation from vectors. However, the proposed Project would have a less-than-significant impact. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

**Conclusion**

With regards to the issue area of Hazards and Hazardous Materials, the following findings can be made:

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. No mitigation measures contained within the GPU EIR would be required because Project specific impacts would be less than significant by adhering to the Project conditions of approval, which are consistent with the GPU EIR.

<b>Significant Project Impact</b>	<b>Impact not identified by GPU EIR</b>	<b>Substantial New Information</b>
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**10. Hydrology and Water Quality** – Would the Project:

a) Violate any waste discharge requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Is the project tributary to an already impaired water body, as listed on the Clean Water Act Section 303(d) list? If so, could the project result in an increase in any pollutant for which the water body is already impaired?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Could the proposed project cause or contribute to an exceedance of applicable surface or groundwater receiving water quality objectives or degradation of beneficial uses?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?

e) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?

f) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

g) Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems?

h) Provide substantial additional sources of polluted runoff?

i) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map, including County Floodplain Maps?

j) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?

k) Expose people or structures to a significant risk of loss, injury or death involving flooding?

l) Expose people or structures to a significant risk of loss, injury or death involving flooding as a result of the failure of a levee or dam?

m) Inundation by seiche, tsunami, or mudflow?

**Discussion**

The following technical studies have been prepared for the Project:

- (1) A CEQA Hydrology Study prepared by Jones Engineering, Inc. dated February 2020.
- (2) A Priority Development Project Stormwater Quality Management Plan (PDP SWQMP) prepared by Jones Engineering, Inc. dated February 28<sup>th</sup>, 2020

10(a) The GPU EIR concluded this impact to be significant and unavoidable. Development projects have the potential to generate pollutants during both the construction and operational phases. For the Project to avoid potential violations of any water quality standards or waste discharge requirements or otherwise substantially degrade surface or

groundwater quality, storm water management plans are prepared for both phases of the development Project.

During the construction phase, the Project would prepare and implement a Storm Water Pollution Prevention Plan (SWPPP). The SWPPP would implement the following typical erosion control BMPs: hydraulic stabilization and hydroseeding on disturbed slopes; County Standard lot perimeter protection detail and County Standard desilting basin for erosion control on disturbed flat areas; energy dissipater outlet protection for water velocity control; silt fencing, fiber rolls, gravel and sand bags, storm drain inlet protection and engineered desilting basin for sediment control; stabilized construction entrance, street sweeping and vacuuming for offsite tracking of sediment; and measures to control materials management and waste management.

The SWPPP would be prepared in accordance with Order No. 2009-009-DWQ, National Pollutant Discharge Elimination System (NPDES) Order CAS000002 Construction General Permit (CGP) adopted by the State Water Resources Control Board (SWRCB) on September 2, 2009. During the post-construction phase, as outlined in the SWQMP, the Project would implement site design, source control and structural BMPs to prevent potential pollutants from entering storm water runoff. The SWQMP has been prepared in accordance with the County of San Diego BMP Design Manual (2019) and SDRWQCB Order No. R9-2013-0001 Municipal Separate Storm Sewer System (MS4) permit (2013), as adopted by the RWQCB on May 8, 2013.

The Project's conformance to the waste discharge requirements of both the CGP and MS4 storm water permits listed above ensures the Project would not create cumulatively considerable water quality impacts and addresses human health and water quality concerns. Therefore, the Project would not contribute to a cumulatively considerable impact to water quality from waste discharges.

As previously discussed, the GPU EIR determined significant and unavoidable impacts to water quality standards and requirements. However, the proposed Project would have a less-than-significant impact to water quality standards through ordinance compliance as detailed above. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 10(b) The GPU EIR concluded this impact to be significant and unavoidable. The GPU EIR concluded this impact to be significant and unavoidable. The Project lies in the Alpine (907.33) hydrologic subarea, within the San Diego hydrologic unit. According to the Clean Water Act section 303(d) list, a portion of this watershed is impaired. Constituents of concern in the San Diego River (Lower) and El Capitan Lake watersheds include fecal coliform, low dissolved oxygen, phosphorus, manganese, pH and total dissolved solids. The Project could contribute to release of these pollutants; however the project would 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.

As previously discussed, the GPU EIR determined significant and unavoidable impacts to water quality standards and requirements. However, Project would have a less-than-significant impact to water quality standards with the implementation of project conditions listed in 10(a). The conditions are consistent with the GPU EIR mitigation measures Hyd-1.2 through Hyd-1.5. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 10(c) The GPU EIR concluded this impact to be significant and unavoidable. As stated in responses 9(a) and 9(b) above, implementation of BMPs and compliance with required ordinances will ensure that project impacts are less than significant.

As previously discussed, the GPU EIR determined significant and unavoidable impacts to water quality standards and requirements and groundwater supplies and recharge. However, the proposed Project would have a less-than significant impact to water quality standards and requirements and groundwater supplies and recharge with the implementation of project conditions listed in 10(a). The conditions are consistent with the GPU EIR mitigation measures Hyd-1.2 through Hyd-1.5. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 10(d) The GPU EIR concluded this impact to be significant and unavoidable. The Project is within the service area of the Padre Dam Municipal Water District that obtains water from surface reservoirs and other imported sources. The Project would not use any groundwater and does not involve operations that would interfere substantially with groundwater recharge.

As previously discussed, the GPU EIR determined significant and unavoidable impacts to groundwater supplies and recharge. However, the proposed Project would have a less-than-significant impact to groundwater recharge. Therefore, the Project would not be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 10(e) The GPU EIR concluded this impact to be less than significant with mitigation. The Project would not result in substantial erosion or siltation on or off-site because storm water management plans are prepared for both the construction and post-construction phases of the development Project. During the construction phase, the Project would prepare and implement a SWPPP. The SWPPP would implement the following typical erosion control BMPs: hydraulic stabilization hydroseeding on disturbed slopes; County Standard lot perimeter protection detail and County Standard desilting basin for erosion control on disturbed flat areas; energy dissipater outlet protection for water velocity control; silt fencing, fiber rolls, gravel and sand bags, storm drain inlet protection and engineered desilting basin for sediment control; stabilized construction entrance, street sweeping and vacuuming for offsite tracking of sediment; and measures to control materials management and waste management.

Existing site runoff is directed southwesterly and ultimately discharges into a natural drainage channel from an existing curb inlet on Victoria Circle. To avoid concentrated discharge impacts, including substantial erosion or siltation on or off-site, on-site improvement would include the following: installation of culvert crossings where drainage courses cross under proposed private roads and driveways, tree wells, spillways, brow ditches, and storm pipes, which would discharge into natural drainage courses.

The SWPPP would be prepared in accordance with Order No. 2009-009-DWQ, NPDES Order CAS000002 CGP adopted by the SWRCB on September 2, 2009. During the post-construction phase, as outlined in the Priority Development Project (PDP) Storm Water Quality Management Plan (SWQMP) dated February 28<sup>th</sup>, 2020, the Project would implement site design, source control and structural BMPs to prevent potential pollutants from entering storm water runoff. The SWQMP has been prepared in accordance with the County of San Diego BMP Design Manual (2019) and SDRWQCB Order No. R9-2013-

0001 Municipal Separate Storm Sewer System (MS4) permit (2013), as adopted by the RWQCB on May 8, 2013.

The SWPPP and SWQMP specify and describe the implementation process of all BMPs that would address equipment operation and materials management, prevent the erosion process from occurring, and prevent sedimentation in any onsite and downstream receiving waters. The Department of Public Works would ensure that these Plans are implemented as proposed.

As previously discussed, the GPU EIR determined significant and unavoidable impacts to erosion or siltation. However, the proposed Project would have a less-than-significant impact to erosion or siltation with mitigation (Hyd-1.2 through Hyd-1.5). Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 10(f) The GPU EIR concluded this impact to be less than significant with mitigation. The CEQA Hydrology Study prepared for the proposed Project by Jones Engineering, Inc. dated February 2020 determined that the proposed Project would not alter the existing drainage pattern in a manner which would result in flooding on- or off-site.

Pre-development conditions of the Project site include drainage of stormwater runoff from the site in south-westerly direction. A historical impoundment exists near the western boundary of the Project site with an associated ponding area and spillway that runs southwesterly and ultimately discharges back into the natural drainage channel downstream of the impoundment.

Post-development conditions of the project site would include the excavation of a wetland bottom channel through the existing ponding area and impoundment along the western boundary of the Project site. The wetland bottom channel would bypass the spillway and eliminate the potential for drainage diversion through the spillway. Drainage would be restored to its natural, historic channel course and would be at or below pre-development rates of discharge.

As previously discussed, the GPU EIR determined impacts to flooding as less than significant with mitigation. The proposed Project would have a less-than-significant impact with regards to flooding with design features and improvements consistent with GPU mitigation measures (Hyd-1.2 through Hyd-1.5). Therefore, the Project would not be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 10(g) The GPU EIR concluded this impact to be less than significant with mitigation. Pursuant to the CEQA Hydrology Study prepared for the proposed Project by Jones Engineering, Inc. dated February 2020, and as described above in 9(e) and 9 (f), the Proposed project would alter the existing pre-development on-site drainage pattern. Post development drainage would be restored to its natural, historic channel course and would be at or below pre-development rates of discharge

Runoff would be directed off-site through an existing street gutter from the intersection of County Meadows Road southerly along the east side of Victoria Circle for a distance of 880 feet where it would discharge into an existing curb inlet which drains directly into the natural drainage channel downstream of the project site. Therefore, the Project would not

contribute runoff water that would exceed the capacity of existing or planned storm water drainage systems.

As previously discussed, the GPU EIR determined impacts to exceed capacity of stormwater systems as less than significant with mitigation. The proposed Project would have a less-than-significant impact with regards to exceeding the capacity of stormwater systems with mitigation (Hyd-1.2 through Hyd-1.5). Therefore, the Project would not be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 10(h) The GPU EIR concluded this impact to be significant and unavoidable. The Project has the potential to generate pollutants; however, site design measures, source control BMPs, and treatment control BMPs as indicated in response 9(a) would be employed such that potential pollutants would be reduced to the maximum extent practicable.

As previously discussed, the GPU EIR determine impacts to water quality standards and requirements as significant and unavoidable. However, the proposed Project would have a less-than-significant impact to water quality standards with the implementation of project conditions listed in 10(a). The conditions are consistent with the GPU EIR mitigation measures Hyd-1.2 through Hyd-1.5. Therefore, the Project would not be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 10(i) The GPU EIR concluded this impact to be less than significant with mitigation. No FEMA or County-mapped floodplains were identified on the project site or off-site improvement locations. Therefore, the Project would not place housing within a County or federal floodplain or flood way.

As previously discussed, the GPU EIR determined impacts from housing within a 100-year flood hazard area as less than significant with mitigation. The proposed Project would have a less-than-significant impact for the reasons detailed above. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 10(j) The GPU EIR concluded this impact to be less than significant with mitigation. As indicated in 10(i), no FEMA or County-mapped floodplains were identified on the project site or off-site improvement locations. Therefore, the Project structures would not impede or redirect flood flows.

As previously discussed, the GPU EIR determined impacts from impeding or redirecting flood flows as less than significant with mitigation. The proposed Project would have a less-than-significant impact for the reasons detailed above. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 10(k) The GPU EIR concluded this impact to be less than significant with mitigation. The project does not propose development within any identified special flood hazard area. As previously discussed, the GPU EIR determined impacts from housing within a 100-year flood hazard area and emergency response and evacuation plans as less than significant with mitigation. The proposed Project would have a less-than-significant impact for the reasons detailed above. Therefore, the Project would be consistent with the analysis

provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 10(l) The GPU EIR concluded this impact to be less than significant with mitigation. The County Office of Emergency Services maintains Dam Evacuation Plans for each dam operational area. These plans contain information concerning the physical situation, affected jurisdictions, evacuation routes, unique institutions, and event responses. If a “unique institution” is proposed, such as a hospital, school, or retirement home, within dam inundation area, an amendment to the Dam Evacuation Plan would be required. The project site lies outside a mapped dam inundation area for a major dam/reservoir within San Diego County.

As previously discussed, the GPU EIR determined impacts from dam inundation and flood hazards and emergency response and evacuation plans as less than significant with mitigation. The proposed Project would have a less-than-significant impact for the reasons detailed above. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 10(m)(i) The GPU EIR concluded this impact to be less than significant with mitigation.

SEICHE: The Project site is not located along the shoreline of a lake or reservoir.

- 10(m)(ii) TSUNAMI: The Project site is not located in a tsunami hazard zone.

- 10(m)(iii) MUDFLOW: Mudflow is type of landslide. See response to question 7(a)(iv).

As previously discussed, the GPU EIR determined impacts from seiche, tsunami and mudflow hazards to be less than significant with mitigation. However, the proposed Project would have a less-than-significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

### **Conclusion**

With regards to the issue area of Hydrology and Water Quality, the following findings can be made:

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 (Hyd-1.2 through Hyd-1.5) would be applied to the Project. The mitigation measures, as detailed above, requires the Project applicant to comply with the guidelines for determining significance for Hydrology and Water Quality as well as for Dam Inundation, the Watershed Protection Ordinance, Stormwater Standards Manual, and the Resource Protection Ordinance.



<b>Significant Project Impact</b>	<b>Impact not identified by GPU EIR</b>	<b>Substantial New Information</b>
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**11. Land Use and Planning** – Would the Project:

- |   |                          |                          |                          |
|---|--------------------------|--------------------------|--------------------------|
| 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**

11(a) The GPU EIR concluded this impact to be less than significant with mitigation. The Project does not propose the introduction of new infrastructure such as major roadways, water supply systems, or utilities to the area. Expanded infrastructure would be limited to on-site extensions of roads and utilities to connect to existing infrastructure connections located within Country Meadows Road. The Project is residential development consistent with the allowed density under the County of San Diego General Plan.

As previously discussed, the GPU EIR concluded physically dividing an established community as less than significant with mitigation. However, the proposed Project would have a less-than-significant impact for the reasons detailed above. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

11(b) The GPU EIR concluded this impact to be less than significant. The Project is subject to the General Plan Semi-Rural Regional Category and contains lands within the Semi-Rural 1 (SR-1) Land Use Designation. The Project is also subject to the policies of the Alpine Community Plan. The plan has goals of preserving and seeking to enhance the rural character of Alpine by maintaining land uses consistent with regional land categories. The Project consistent with the policies of the Alpine Community Plan. Additionally, the property is zone Limited Agricultural (A70) which allows for limited agricultural use types as well as residential land use types pursuant to the Zoning Ordinance; therefore, the proposed Project would not cause a significant environmental impact due to conflict with any adopted land use plan, policy or regulation.

As previously discussed, the GPU EIR determined impacts to conflicts with land use plans, policies, regulations as less than significant. As the Project would have a less-than significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

**Conclusion**

With regards to the issue area of Land Use and Planning, the following findings can be made:

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. No mitigation measures contained within the GPU EIR would be required because Project specific impacts would be less than significant.

<b>Significant Project Impact</b>	<b>Impact not identified by GPU EIR</b>	<b>Substantial New Information</b>
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**12. Mineral Resources** – Would the Project:

- |   |                          |                          |                          |
|---|--------------------------|--------------------------|--------------------------|
| a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?                                | <input type="checkbox"/> | <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"/> |

12(a) The GPU EIR determined that impacts to mineral resources would be significant and unavoidable. The California Surface Mining and Reclamation Act (SMARA) required classification of land into Mineral Resource Zones (MRZs). The Project site has been classified by the California Department of Conservation – Division of Mines and Geology (Update of Mineral Land Classification: Aggregate Materials in the Western San Diego Production-Consumption Region, 1997) as an area of “Potential Mineral Resource Significance” (MRZ-3). However, the Project site is surrounded by semi-rural residential land uses which are incompatible to future extraction of mineral resources on the project site. A future mining operation at the Project site would likely create a significant impact to neighboring properties for issues such as noise, air quality, traffic, and possibly other impacts. Therefore, implementation of the Project will not result in the loss of availability of a known mineral resource that would be of value since the mineral resource has already been lost due to incompatible land uses.

As previously discussed, the GPU EIR determined impacts to mineral resources to be significant and unavoidable. As the proposed Project would have a less-than-significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

12(b) The GPU EIR concluded this impact to be significant and unavoidable. The Project is not located in an area that has MRZ-2 designated lands, nor is it located within 1,300 feet of such lands. Therefore, no potentially significant loss of availability of a known mineral resource or locally important mineral resource recovery (extraction) site delineated on a local general plan, specific plan or other land use plan will occur as a result of this project. The Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

**Conclusion**

With regards to the issue area of Mineral Resources, the following findings can be made:

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. No mitigation measures contained within the GPU EIR would be required because Project specific impacts would be less than significant.

Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
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**13. Noise** – Would the Project:

a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

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

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

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

An Acoustical Site Assessment was prepared for the Project by Investigative Science and Engineering, Inc. dated December 6, 2019.

13(a) The GPU EIR concluded this impact to be less than significant with mitigation. The area surrounding the Project site consists of residences, vacant lots, and open space. The Project will not expose people to potentially significant noise levels that exceed the allowable limits of the General Plan, Noise Ordinance, or other applicable standards for the following reasons:

General Plan – Noise Element: Policy 4b addresses noise sensitive areas and requires projects to comply with a Community Noise Equivalent Level (CNEL) of 60 decibels (dBA). Projects which could produce noise in excess of 60 dB(A) are required to incorporate design measures or mitigation as necessary to comply with the Noise Element. Based on a review of the County’s noise contour maps, the Project is not expected to expose existing or planned noise sensitive areas to noise in excess of 60 dB(A).

Noise Ordinance – Section 36-404: Non-transportation noise generated by the Project is not expected to exceed the standards of the Noise Ordinance at or beyond the Project’s property line. The Project site, as well as surrounding parcels to the north, east, and west are zoned Limited Agriculture (A70), which is subject to the noise level limits of 50 dBA daytime and 45 dBA nighttime. The surrounding parcels to the south are zoned Multi-Family Residential (RM) and Transportation & Utility Corridor (S94), which are also subject to the noise level limit of 50 dBA daytime and 45 dBA nighttime. The primary noise source from the Project is from the Heating Ventilating and Air Conditioning (HVAC) units. The project proposes 20 ground-based HVAC unit adjacent to each residential structure. The Acoustical Site Assessment prepared for the Project modeled 20 Mitsubishi Electric Model MXZ-3C24NAHZ2 units, which produce a sound level of 58 dBA at 10 feet. Based on those specifications, the noise levels would be reduced to 40 dBA at the nearest property line. Therefore, the Project does not involve any noise producing equipment that would exceed applicable noise levels at the adjoining property line.

Noise Ordinance – Section 36-410: The Project will not generate construction noise in excess of Noise Ordinance standards. Construction operations will occur only during permitted hours of operation. Grading and construction activities have the potential to exceed an average sound level of 75dB at property lines, however, project conditions would include noise monitoring to occur prior to grading and construction to reduce impacts to a less than significant level. Grading and construction activities on site include usage of equipment such as excavators, backhoes, loader, trucks, and compactors. Based on the Acoustical Site Assessment, usage of grading equipment would result in 77.4 dBA at 50 feet. As a result, areas where 75 dBA Leq-8h contour encroaches on adjacent residential parcels would be in excess of County Noise Ordinance Section 36.409 standards. The Project would be designed and conditioned for on-site acoustical monitoring of grading and construction activities, and remedial engineering practices would be implemented on a case-by-case basis as individual lot development occurs to reduce noise levels into compliance with the noise standards. Blasting operations would comply with the County’s Consolidated Fire Code. In addition, in order to ensure that the blasting activities comply with the Noise Ordinance, the project would be conditioned for a blasting plan to be submitted to the County and approved by a County noise specialist prior to approval of any grading and/or improvement plans and issuance of any Grading or Construction Permits.

As previously discussed, the GPU EIR determined impacts from excessive noise levels to be less than significant with mitigation. However, the proposed Project would have a less than significant impact with the incorporation of project conditions consistent with GPU EIR mitigation measure Noi-4.2. Therefore, the proposed Project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 13(b) The GPU EIR concluded this impact to be less than significant with mitigation. The Project proposes residential uses which are sensitive to low ambient vibration. However, the residences would be more than 600 feet from any public road or transit Right-of-Way with

projected noise contours of 65 dB or more; any property line for parcels zoned industrial or extractive use; or any permitted extractive uses. A setback of 600 feet ensures that the operations do not have any chance of being impacted by groundborne vibration or groundborne noise levels (Harris, Miller Miller and Hanson Inc., Transit Noise and Vibration Impact Assessment 1995).

Blasting operations would comply with the County's Consolidated Fire Code. In addition, in order to ensure that the blasting activities comply with the Noise Ordinance, the project would be conditioned for a blasting plan to be submitted to the County and approved by a County noise specialist prior to approval of any grading and/or improvement plans and issuance of any Grading or Construction Permits.

As previously discussed, the GPU EIR determined impacts from excessive groundborne vibration to be less than significant with mitigation. However, the Project would have a less than significant impact for the reasons detailed above. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 13(c) As indicated in the response listed under Section 12(a), the Project would not expose existing or planned noise sensitive areas in the vicinity to a substantial permanent increase in noise levels that exceed the allowable limits of any applicable noise standards. Additionally, the Project is not expected to expose existing or planned noise sensitive areas to noise 10 dB CNEL over existing ambient noise levels. The Project complies with the County's Noise Elements with adherence to Project conditions of approval. Based on the Acoustical Site Assessment, on-site noise sensitive land uses would not be exposed to noise levels that exceed 60 dBA. The highest exterior noise level to the site is 59.7 dBA CNEL, therefore, the exterior and interior noise level to the site is expected to comply with the Noise Elements. Furthermore, based on the Traffic Impact Study prepared for the proposed Project by LOS Engineering, Inc. dated August 28<sup>th</sup>, 2017, the Project will generate 252 average daily trips (ADT). These trips would be distributed on the mobility element roadways in the County that were analyzed by the TIF program, some of which currently operate or are projected to operate at inadequate levels of service. However, the increase in ADT by the Project would not result in exposing the on- or off-site, existing, and foreseeable future noise sensitive land uses to noise levels that exceed the noise standards.

As previously discussed, the GPU EIR determined impacts from permanent increase in ambient noise levels to be significant and unavoidable. However, the Project would have a less-than-significant impact for the reasons detailed above. Therefore, the Project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 13(d) The GPU EIR concluded this impact to be less than significant with mitigation. The Project does not involve any operational uses that may create substantial temporary or periodic increases in ambient noise levels in the Project vicinity. Also, general construction noise is not expected to exceed the construction noise limits of the Noise Ordinance. Construction operations will occur only during permitted hours of operation. Additionally, the Project would not operate construction equipment in excess of 75 dB for more than 8 hours during a 24-hour period.

As previously discussed, the GPU EIR determined impacts from temporary increase in ambient noise levels to be less than significant with mitigation. However, the proposed

Project would have a less than significant impact for the reasons detailed above. Therefore, the Project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

13(e) The GPU EIR concluded this impact to be less than significant with mitigation. The Project is not located within an Airport Land Use Compatibility Plan (ALUCP) for airports or within 2 miles of a public airport or public use airport. The nearest airport is approximately 11 miles away from the Project site. Therefore, the Project would not expose people residing or working in the project area to excessive airport-related noise levels and would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

13(f) The GPU EIR concluded this impact to be less than significant with mitigation. The Project is not located within a one-mile vicinity of a private airstrip. The nearest airport is approximately 11 miles away from the Project site. Therefore, the proposed Project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

**Conclusion**

With regards to the issue area of Noise, the following findings can be made:

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. No mitigation measures contained within the GPU EIR would be required because Project specific impacts would be less than significant by adhering to the project conditions of approval, which are consistent with the GPU EIR.

**14. Population and Housing – Would the Project:**

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

<b>Significant Project Impact</b>	<b>Impact not identified by GPU EIR</b>	<b>Substantial New Information</b>
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<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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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"/>
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**Discussion**

14(a) The GPU EIR concluded this impact to be less than significant. The Project site is designated in the General Plan as Semi-Rural (SR-1). The Project is consistent with the density allowable under the general plan, and thus would not induce substantial unplanned

population growth in the area, as development of the site was accounted for within the GPU. In addition, the Project does not propose any physical or regulatory change that would remove a restriction to or encourage population growth in the area.

As previously discussed, the GPU EIR determined impacts from population growth to be less than significant. As the proposed Project would have a less than significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 14(b) The GPU EIR concluded this impact to be less than significant. The Project site is currently vacant. As such, the Project would not displace substantial numbers of existing housing and replacement housing would not be required elsewhere.

As previously discussed, the GPU EIR determined impacts from displacement of housing to be less than significant. As the proposed Project would have a less than significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 14(c) The GPU EIR concluded this impact to be less than significant. The Project site is currently vacant. As such, the Project would not displace substantial numbers of people and replacement housing would not be required elsewhere.

As previously discussed, the GPU EIR determined impacts from displacement of housing to be less than significant. As the proposed project would have a less than significant impact for reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

## **Conclusion**

With regards to the issue area of Population and Housing, the following findings can be made:

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. No mitigation measures contained within the GPU EIR would be required because Project specific impacts would be less than significant.

<b>Significant Project Impact</b>	<b>Impact not identified by GPU EIR</b>	<b>Substantial New Information</b>
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**15. 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?

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

15(a) The GPU EIR concluded this impact to be less than significant with mitigation for the exception of school services, which remained significant and unavoidable. Based on the service availability forms received for the Project, the proposed Project would not result in the need for significantly altered services or facilities. Water service would be provided by the Padre Dam Municipal Water District. Sanitation would be provided by OWTS for each individual lot. Minor pipeline extensions would be required to serve the Project site for water services.

Fire and emergency protection would be provided by the Alpine Fire Protection District (AFPD). The nearest fire station is AFPD’s Fire Station #17, located approximately 1.8 miles from the Project site, which has sufficient capacity to serve the Project.

Pursuant to the Project availability forms, students living within this community would attend schools within the Grossmont Union High School District and Alpine Union School District. Elementary students would attend Boulder Oaks Elementary School, middle school students would attend Joan MacQueen Middle School, and high school students would attend Granite Hills High School.

Based on the Project’s service availability forms, and the discussion above, the Project would not result in the need for significantly altered services or facilities. As previously discussed, the GPU EIR determined impact to fire protection services, police protection services and other public services as significant with mitigation while school services remained significant and unavoidable. However, as the Project would have a less-than-significant impact for the reasons stated above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

**Conclusion**

With regards to the issue area of Public Services, the following findings can be made:

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. No mitigation measures contained within the GPU EIR would be required because Project specific impacts would be less than significant.

<b>Significant Project Impact</b>	<b>Impact not identified by GPU EIR</b>	<b>Substantial New Information</b>
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**16. Recreation** – Would the Project:

a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

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

16(a) The GPU EIR concluded this impact to be less than significant with mitigation. The project would increase the use of existing parks and other recreational facilities; however, the project would be subject to Park Land Dedication Ordinance (PLDO) fees.

As previously discussed, the GPU EIR determined impacts related to deterioration of parks and recreational facilities to be less than significant. As the proposed Project would have a less-than-significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

16(b) The GPU EIR concluded this impact to be less than significant with mitigation. The project does not include recreational facilities or require the construction or expansion of recreational facilities. Therefore, the construction or expansion of recreational facilities cannot have an adverse physical effect on the environment.

As previously discussed, the GPU EIR determined impacts related to construction of new recreational facilities to be less than significant. As the proposed Project would have a less-than-significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

**Conclusion**

With regards to the issue area of Recreation, the following findings can be made:

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. No mitigation measures contained within the GPU EIR would be required because Project specific impacts would be less than significant.

<b>Significant Project Impact</b>	<b>Impact not identified by GPU EIR</b>	<b>Substantial New Information</b>
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**17. Transportation and Traffic** – Would the Project:

a) Conflict with an applicable plan, ordinance or policy establishing measures of the effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths and mass transit?

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

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

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

A Traffic Impact Study was prepared for the Project by LOS Engineering, Inc. dated August 28<sup>th</sup>, 2017.

17(a) The GPU EIR concluded this impact to be significant and unavoidable. The County of San Diego Guidelines for Determining Significance for Traffic and Transportation (Guidelines) establish methods of effectiveness for the performance of the circulation system. These

Guidelines incorporate standards from the County of San Diego Public Road Standards, Mobility Element, and the Transportation Impact Fee Program.

As discussed in the Traffic Impact Study prepared for the Project, new Project trips would be distributed onto mobility element roadways in the County, some of which are currently projected to operate at inadequate levels of service (LOS). The Project would result in an additional 252 average daily trips 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:

<b>Level of Service Ranges</b>			
<b>Level of Service</b>	<b>Roadway Segments – Average Daily Traffic (ADT) Volume <sup>1</sup></b>	<b>Signalized Intersections – Delay (Seconds/Vehicle) <sup>2</sup></b>	<b>Unsignalized Intersections – Delay (Seconds/Vehicle) <sup>2</sup></b>
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).

According to the Traffic Impact Study, all study elements were calculated to operate a LOS C or better, with the exception of the road segment of Tavern Road between Victoria Park Terrace and Alpine Boulevard, which would continue to operate at LOS E. Therefore, the Project would not result in any significant direct impacts. However, the project would contribute trips to County mobility element roadways which are currently projected to operate at inadequate levels of service. Therefore, the project would contribute a significant cumulative impact requiring mitigation.

The County of San Diego has developed an overall programmatic solution that addresses existing and projected future road deficiencies in the unincorporated portion of San Diego County. The TIF program creates a mechanism to proportionally fund improvements to roadways necessary to mitigate potential cumulative impacts caused by traffic from future development. These project trips could potentially contribute to a potential significant cumulative impact and mitigation is required. The potential growth represented by this project was included in the growth projections upon which the TIF program is based.

**Project Mitigation**

The Project would incorporate GPU EIR mitigation measures Tra-1.7 and Tra-2.1 which include implementation of the County TIF Ordinance and coordination efforts with other

jurisdictions to reduce impacts to the effectiveness for the performance of the circulation system to a less than significant level.

As previously discussed, the GPU EIR determined significant and unavoidable impacts to unincorporated County traffic and LOS standards. The proposed Project determined impacts to be potentially significant. However, the Project would have a less-than-significant impact with the incorporation of GPU EIR mitigation measures Tra-1.7, and Tra-2.1 for a less than significant impact with mitigation. Therefore, the Project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

17(b) The GPU EIR concluded this impact to be significant and unavoidable. The designated congestion management agency for the County is the San Diego Association of governments (SANDAG). In October 2009, the San Diego region elected to be exempt from the State CMP and, since this decision, SANDAG has been abiding by 23 CFR 450.320 to ensure the region's continued compliance with the federal congestion management process. Therefore, the project would not conflict with an applicable congestion management program and would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

17(c) The GPU EIR concluded this impact to be less than significant with mitigation. The Project site is not located within an Airport Influence Area, Airport Safety Zone, Airport Land Use Compatibility Plan Area, Avigation Easement, or Overflight Area. Therefore, the Project would have a less than significant impact to air traffic patterns. The Project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

17(d) The GPU EIR concluded this impact to be significant and unavoidable. The proposed Project would 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.

As previously discussed, the GPU EIR determined impacts on rural road safety to be significant and unavoidable. However, the Project would have a less-than-significant impact with no mitigation required for the reasons detailed above. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

17(e) The GPU EIR concluded this impact to be less than significant with mitigation. The proposed project will not result in inadequate emergency access. The project is not served by a dead-end road that exceeds the maximum cumulative length permitted by the San Diego County Consolidated Fire Code. In addition, consistent with GPU EIR mitigation measure Tra-4.2, the Project would implement the Building and Fire codes to ensure emergency vehicle accessibility.

As previously discussed, the GPU EIR determined impacts on emergency access as less than significant with mitigation. As the Project would have a less-than-significant impact for the reasons detailed above and is consistent with GPU EIR Mitigation Measure Tra-4.2, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

17(f) The GPU EIR concluded this impact to be less than significant with mitigation. The Project would 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.

As previously discussed, the GPU EIR determined impacts on alternative transportation and rural safety as less than significant with mitigation. As the proposed Project would have a less-than-significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

**Conclusion**

With regards to the issue area of Transportation and Traffic, the following findings can be made

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 (Tra-1.7, Tra-2.1 and Tra-4.2) would be applied to the Project.

<b>Significant Project Impact</b>	<b>Impact not identified by GPU EIR</b>	<b>Substantial New Information</b>
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**18. Utilities and Service Systems** – Would the Project:

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

adequate capacity to serve the project’s projected demand in addition to the provider’s existing commitments?

f) Be served by a landfill with sufficient permitted capacity to accommodate the project’s solid waste disposal needs?

g) Comply with federal, state, and local statutes and regulations related to solid waste?

**Discussion**

18(a) The GPU EIR concluded this impact to be less than significant with mitigation. The Project proposes to discharge domestic waste to on-site wastewater systems (OSWS), also known as septic systems. Discharged wastewater must conform to the Regional Water Quality Control Board’s (RWQCB) applicable standards, including the Regional Basin Plan and the California Water Code. California Water Code Section 13282 allows RWQCBs to authorize a local public agency to issue permits for OSWS “to ensure that systems are adequately designed, located, sized, spaced, constructed and maintained.” The RWQCBs with jurisdiction over San Diego County have authorized the County of San Diego, Department of Environmental Health (DEH) to issue certain OSWS permits throughout the County and within the incorporated cities. The Project would require DEH approval of the OSWS lay-out for the Project pursuant to DEH, Land and Water Quality Division’s, “On-site Wastewater Systems: Permitting Process and Design Criteria” prior to obtaining a building permit for residential development. Therefore, the Project would be consistent with the wastewater treatment requirements of the RWQCB as determined by the authorized, local public agency.

As previously discussed, the GPU EIR determined impacts on wastewater treatment requirements to be less than significant. As the proposed Project would have a less-than-significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

18(b) The GPU EIR concluded this impact to be less than significant with mitigation. The GPU EIR concluded this impact to be less than significant with mitigation. The Project would rely on an on-site wastewater treatment system would require DEH approval of the OSWS lay-out for the Project pursuant to DEH, Land and Water Quality Division’s, “On-site Wastewater Systems: Permitting Process and Design Criteria” prior to obtaining a building permit for residential development.

Additionally, Project requires water service from the Padre Dam Municipal Water District. Service Availability Letter from the Padre Dam Municipal Water District has been provided, indicating adequate water resources and entitlements are available to serve the requested water resources. Therefore, the Project would have sufficient water supplies available, and would not require substantial pipeline extensions to serve the Project. Thus, these extensions would not result in additional adverse physical effects beyond those already identified in other sections of this environmental analysis.

As previously discussed, the GPU EIR determined impacts to adequate water supplies be less than significant with mitigation. However, the proposed Project would have a less-than-significant for the reasons detailed above. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 18(c) The GPU EIR concluded this impact to be less than significant with mitigation. The Project involves new storm water drainage facilities (tree wells, spillways, brow ditches, and storm pipes). However, these extensions would not result in additional adverse physical effects beyond those already identified in other sections of this environmental analysis.

As previously discussed, the GPU EIR determined impacts on sufficient stormwater drainage facilities to be less than significant. As the proposed Project would have a less-than-significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 18(d) The GPU EIR concluded this impact to be significant and unavoidable. A Service Availability Letter from the Padre Dam Municipal Water District has been provided which indicates that there is adequate water to serve the Project.

As previously discussed, the GPU EIR determined impacts to adequate water supplies be significant and unavoidable. However, the proposed Project would have a less-than-significant impact with no required mitigation for the reasons detailed above. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 18(e) The GPU EIR concluded this impact to be less than significant with mitigation. The Project would rely on an on-site wastewater system (septic system); therefore, the Project would not interfere with any wastewater treatment provider's service capacity.

As previously discussed, the GPU EIR determined impacts to adequate wastewater facilities be less than significant with mitigation. However, the proposed Project would have a less-than-significant impact for the reasons detailed above. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 18(f) The GPU EIR concluded this impact to be significant and unavoidable. All solid waste facilities, including landfills require solid waste facility permits to operate. There are five, permitted active landfills in San Diego County with remaining capacity to adequately serve the Project. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 18(g) The GPU EIR concluded this impact to be less than significant. The Project would deposit all solid waste at a permitted solid waste facility. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

### **Conclusion**

With regards to the issue area of Utilities and Service Systems, the following findings can be made:

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. No mitigation measures contained within the GPU EIR would be required because Project specific impacts would be less than significant.

<b>Significant Project Impact</b>	<b>Impact not identified by GPU EIR</b>	<b>Substantial New Information</b>
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**19. Wildfire** – If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the Project:

- |  |                          |                          |                          |
|--|--------------------------|--------------------------|--------------------------|
| a) Substantially impair an adopted emergency response plan or emergency evacuation plan?   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts in the environment? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| d) Expose people or structures to significant risk, including downslopes or downstream flooding or landslides, as a result of runoff, post-fire instability, or drainage changes?  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

**Discussion**

Wildfire was analyzed within the GPU EIR within Section 2.7, Hazards and Hazardous Materials. The guidelines for determining significance stated: the proposed General Plan Update would have a significant impact if it would 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. In 2019, the issue of Wildfire was separated into its own section within Appendix G of the CEQA Guidelines to incorporate the four issue questions above. The GPU EIR did address these issues within the analysis; however, they were not called out as separate issue areas. Within the GPU EIR, the issue of Wildland Fires was determined to be significant and unavoidable.

19(a) The GPU EIR concluded this impact to be significant and unavoidable. The site is located in a very high fire hazard severity zone (FHSZ). The Project site is within the Alpine Fire Protection District and is located approximately 1.8 miles from the nearest fire station, AFD Station #17 and has an estimated response time of 4 minutes pursuant to the Fire Protection Plan prepared for the Project. Future residents will use Country Meadows Road as the primary initial evacuation route from the Project Site.

A Fire Protection Plan (FPP) for the Project was prepared by J. Charles Weber dated November 2019. The FPP considered the property location, topography, geology, combustible vegetation (fuel types), climatic conditions and fire history as part of the assessment. Additionally, the FPP analyzed existing fire protection measures within the



vicinity of the Project site and discussed measures to be undertaken by the proposed Project for the purpose of fire protection.

Fire hydrants are distributed at Code and Ordinance required and Alpine Fire Marshal approved intervals throughout the established sub-division to the west of the Project Site, with the nearest hydrant to the Project site located at the intersection of Country Meadows Road and Victoria Circle. Additionally, all new and future buildings would be required to have automatic fire sprinkler systems compliant with NFPA Pamphlet 13-D for residential fire sprinklers in one and two family dwellings installed as required by the most current edition of the Alpine FPD ordinances and San Diego County Consolidated Fire Code.

Fuel Modification Zones would be maintained by the property owner to meet the requirements of the Alpine Fire Protection District. A minimum 100-foot defensible space is required unless the adjacent property line is closer than 100-feet, in which case defensible space would be required to be maintained to the property line. Parcels 5, 6, 7, and 11 would be required to have a full 100 feet of defensible space due to slope and terrain. Additionally, parcels 1,3, 5, and 6 of the proposed tentative map would require the installation of concrete driveways, as the percent of the driveway exceeds 15 percent.

During the construction phase, at least 50 feet of clearance free of all flammable vegetation would be provided around all structures as an interim fuel modification zone.

All individual landscaping plans would be required to comply with the FPP prepared for the Project. Additionally, trees and plants will be planted in accordance with the County of San Diego Approved Plants for Defensible Space in Fire Prone Areas List as shown in Appendix A of the FPP or as approved by the Alpine Fire Protection District.

As previously stated, Wildfire was analyzed within the GPU EIR within Section 2.7, Hazards and Hazardous Materials and was determined to be significant and unavoidable. However, the proposed Project would have a less-than-significant impact for the reasons detailed above. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 19(b) The GPU EIR concluded this impact to be significant and unavoidable. The Project is within a very high fire hazard severity zone and within the Urban-Wildlife Interface Zone. The Project would comply with regulations relating to emergency access, water supply, and defensible space specified in the County Fire Code and Consolidated Fire Code. Implementation of the fire safety standards would occur during the building permit process and is consistent with GPU mitigation measures Haz-4.2 and Haz-4.3. In addition, the Project is consistent with the Zoning Ordinance and the density established under the County of San Diego General Plan. Therefore, for the reasons stated above, the Project would not be expected to experience exacerbated wildfire risks due to slope, prevailing, winds or other factors.

As previously stated, Wildfire was analyzed within the GPU EIR within Section 2.7, Hazards and Hazardous Materials and was determined to be significant and unavoidable. However, the proposed Project would have a less-than-significant impact for the reasons detailed above. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 19(c) The GPU EIR concluded this impact to be significant and unavoidable. The Project would require the installation and maintenance of new private roads. All infrastructure associated

with the Project has been incorporated within this analysis. Therefore, no additional temporary or ongoing impacts to the environment related to associated infrastructure would occur that have not been analyzed in other sections of this environmental document.

As previously discussed, the GPU EIR determined impacts from Wildfire to be significant and unavoidable. However, the Project would have a less-than-significant impact for the reasons detailed above. Therefore, the Project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 19(d) The GPU EIR concluded this impact to be significant and unavoidable. The GPU EIR concluded this impact to be significant and unavoidable. As previously stated in 19(b), the Project would comply with regulations relating to emergency access, water supply, and defensible space specified in the County Fire Code and Consolidated Fire Code. The site is not located within a "Landslide Susceptibility Area" as identified in the County Guidelines for Determining Significance for Geologic Hazards. Therefore, for the reasons stated above, the project site would not expose people or structures to significant risk, including downslopes or downstream flooding or landslides, as a result of runoff, post-fire instability, or drainage changes.

The GPU EIR concluded significant and unavoidable impacts associated with Wildfire under Section 2.7, Hazards and Hazardous Materials. However, the proposed Project would have a less-than-significant impact with for the reasons detailed above. Therefore, the Project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR

## **Conclusion**

With regards to the issue area of Wildfire, the following findings can be made:

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 (Haz-4.2 and Haz-4.3) would be applied to the Project. These mitigation measures, as detailed above, requires the Project applicant to implement brush management and comply with the building and fire codes.

## **Appendices**

Appendix A – References

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

## Appendix A

The following is the list of Project specific technical studies used to support the Project's environmental analysis. All technical studies are available on the website here [https://www.sandiegocounty.gov/content/sdc/pds/Current\\_Projects.html#par\\_title](https://www.sandiegocounty.gov/content/sdc/pds/Current_Projects.html#par_title) or hard copies are available at the County of San Diego Zoning Counter, 5510 Overland Avenue, Suite 110, San Diego, 92123:

Cummings, Gretchen; Cummings Environmental, Inc., (May 15, 2020), Full Biological Resources Report Over Alpine 21

Falvey, Nicole and Robbins-Wade, Mary; Helix Environmental Planning, Inc., (June 2019), Cultural Resources Survey Report – Negative Findings, Alpine 21 Project

La Monte, Clifford W.; C.W La Monte Company Inc., (November 12, 2019), Landslide Rockfall Hazards

La Monte, Clifford W. and Redolfi, Jerry; C.W. La Monte Company Inc., (August 19, 2016), Report of Limited Geotechnical Investigation

Long, Ryan; Jones Engineers Inc., (February 2020), CEQA Hydrology Study Alpine 21

Long, Ryan, PE; Jones Engineers, Inc., (February 28, 2020), Stormwater Quality Management Plan (SWQMP) For Priority Development Projects (PDPs)

O'Bannon, Joe; OB-1 Air Analyses, (March 3, 2020) Climate Action Plan Checklist

O'Bannon, Joe; OB-1 Air Analyses, (Revised June 3, 2020) Limited Air Quality Study & Climate Action Plan Checklist

Rasas, Justin; LOS Engineering, Inc., (August 28, 2017), Draft Focused Traffic Impact Study

Taveres, Rick; Investigative Science and Engineering, Inc., (January 30, 2019), Acoustical Site Assessment, Victoria Estates Subdivision (TM 5431)

Weber, J. Charles; Fire and Life Safety Consultant, (November 2019), TM5431 Alpine 21 Tentative Map Fire Protection Plan

### References

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

[http://www.sdcounty.ca.gov/PDS/gpupdate/docs/BOS\\_Aug2011/EIR/FEIR\\_5.00\\_-\\_References\\_2011.pdf](http://www.sdcounty.ca.gov/PDS/gpupdate/docs/BOS_Aug2011/EIR/FEIR_5.00_-_References_2011.pdf)

## Appendix B

**A Summary of Determinations and Mitigation within the Final Environmental Impact Report, County of San Diego General Plan Update, SCH # 2002111067 is available on the Planning and Development Services website at:**

[http://www.sdcounty.ca.gov/pds/gpupdate/GPU\\_FEIR\\_Summary\\_15183\\_Reference.pdf](http://www.sdcounty.ca.gov/pds/gpupdate/GPU_FEIR_Summary_15183_Reference.pdf)