



# 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:** Anza Street Townhomes

**Project Record Numbers:** PDS2018-TM-5628; PDS2018-REZ-18-003

**Environmental Log Number:** PDS2018-ER-18-14-006

**APN(s):** 484-092-31-00; 484-092-33-00; 484-092-34-00; 484-092-35-00; 484-291-01-00

**Lead Agency Name and Address:**

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858-694-2019

**Project Location:** The proposed project (Project) is located within the unincorporated community of Lakeside in central San Diego County. The 3.2-acre project site is located at 1118 N. Anza Street, El Cajon. The site is located within the Lakeside Community Plan area. Variable family residential development within the unincorporated County abuts the project site to the north, east, and south, and multi-family residential development within the jurisdiction of the City of El Cajon to the west.

**Project Applicant Name and Address:**

Hall Land Company, Inc.  
740 Lomas Santa Fe Drive, Ste. 204  
Solana Beach, CA 92075

**General Plan**

Community Plan:	Lakeside
Regional Categories:	Village
Land Use Designations:	Village Residential (VR-15)
Density:	VR-15
Floor Area Ratio (FAR)	N/A

## **Zoning**

<b>Use Regulation:</b>	Variable Family Residential (RV)
<b>Minimum Lot Size:</b>	1 du per 6,000 Square Feet
<b>Special Area Regulation</b>	Airport (C)

## **Description of Project:**

The Anza Street Townhomes project applicant proposes the subdivision of five existing parcels totaling 3.2 acres into 39 two-story townhomes on one common lot within the Lakeside Community Plan area. The project site is currently developed with several existing single-family residences that will be removed with the project. The project site is surrounded primarily by multi-family residential developments, single family homes, and commercial uses. The project site is directly adjacent to the City of El Cajon, which bounds the project site to the west. The site and surrounding land is very slightly sloped with an average slope between 0% and 15%. Access to the site will be provided by N. Anza Street, a County Maintained Public roadway via two proposed private driveways. Proposed earthwork quantities for the project consist of 720 cubic yards of cut and 18,190 cubic yards of fill with approximately 17,500 cubic yards of import and no export required.

The General Plan Regional Category for the project site is Village Residential, and the General Plan Land Use Designation is Village Residential 15 (VR-15), which allows 15 dwelling units per acre. The allowed density would produce approximately 48 dwelling units. The applicant is proposing 39 dwelling units, which is a density of 12.28 dwelling units per acre. The Zoning Use Regulation for the site is Variable Residential with a "C" Special Area Designator for Airport compatibility review.

## **Discretionary Actions:**

Discretionary permits for the Project include a Tentative Map and a Rezone. The Tentative Map would subdivide the 3.2-acre project site to 39 multi-family residences on one common lot. The project is consistent with the residential density allowed under the County General Plan, however a Rezone is required to change the Building Type designator from "F" to "K" to allow for multiple dwellings on the same lot, as well as to establish a "J" designator for 350 square feet of Private and 150 square feet of Group Open Space.

## **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

Anza Street Townhomes is consistent with the analysis performed for the GPU EIR. Further, the GPU EIR adequately anticipated and described the impacts of the proposed project, identified applicable mitigation measures necessary to reduce project specific impacts, and the project implements these mitigation measures (see [http://www.sandiegocounty.gov/content/dam/sdc/pds/gpupdate/docs/BOSAug2001/EIR/FEIR7.00-Mitigation Measures 2011.pdf](http://www.sandiegocounty.gov/content/dam/sdc/pds/gpupdate/docs/BOSAug2001/EIR/FEIR7.00-Mitigation%20Measures%202011.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 a 3.2-acre property into 39 townhome units on one common lot, which is consistent with the VR-15 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 Cultural Resources, Hydrology and Traffic. However, applicable mitigation measures specified within the GPU EIR have been made conditions of approval for this project.

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

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

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

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

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

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

<hr/> Signature	<hr/> <b>December 19, 2019</b> Date
<hr/> <b>Denise Russell</b> Printed Name	<hr/> <b>Project Manager</b> Title

## **CEQA Guidelines §15183 Exemption Checklist**

### **Overview**

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

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

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

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

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

### Discussion

- 1(a) 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 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 that 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 1118 N. Anza Street, within the Lakeside Community Planning Area in the unincorporated County of San Diego. El Capitan Reservoir RCA, located approximately 3.9 miles from the Project site, is identified as a visual resource pursuant to the County of San Diego Guidelines for Determining Significance. Due to intervening topography, and Project consistency with existing surrounding development, the project will not detract from any views of RCAs.

Trail systems and public parks exist nearby, however none would provide topographically accessible views to the Project. The Project site is located approximately 1.8 miles from the North Granite Hills Pathway, which does not afford any views of the project site due to distance and intervening land uses.

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 nearest State designated Scenic Highway is SR-125, located approximately 3.8 miles from the Project site. In addition, 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. Designated scenic roadways located in the vicinity of the project site include I-8 from El Cajon city limits to Imperial County Line, Dehesa Road from El Cajon city limits to Tavern Road, and La Cresta Road from Greenfield Drive to La Cresta Boulevard. No direct views to the Project site are available from SR-125, I-8, Dehesa Road, or La Cresta Road due to distance and constraining intervening structures and landscaping.

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 an urbanized area of the Lakeside community, located on N. Anza Street near its intersection with Broadway, directly adjacent to the City of El Cajon. The existing visual character and quality of the Project surroundings are characterized as highly developed and diverse land use types such as commercial, industrial and medium density residential with relatively flat or slightly sloped grades. Both N. Anza Street and Broadway support high-density residential developments similar to the proposed Project.

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 Lakeside Community Plan and location of the site within a heavily developed area. Additionally, the location, size, and design of the proposed use would be compatible with adjacent uses. The proposed development is similar to surrounding multi-family residential use types nearby to the south, west, and northwest.

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 31 miles from the Mount Laguna Observatory and approximately 35 miles from Palomar Observatory. However, 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.



	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
<b>2. Agriculture/Forestry Resources</b>			
– Would the Project:			
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide or Local Importance as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, or other agricultural resources, to a non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland zoned Timberland Production?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Result in the loss of forest land, conversion of forest land to non-forest use, or involve other changes in the existing environment, which, due to their location or nature, could result in conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Important Farmland or other agricultural resources, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**Discussion**

- 2(a) The GPU EIR concluded this impact to be significant and unavoidable. The project site contains candidate soils which have been mapped by the Farmland Mapping and Monitoring Program (FMMP) of the California Resources Agency. The mapped candidate soils are Farmland of Statewide Importance. However, the project site is developed and is surrounded by developed commercial and residential lots. Additionally, the project site does not contain lands designated as Prime Farmland, Unique Farmland or Farmland of local importance as mapped by FMMP. Due to the existing development and 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 a less than significant direct and indirect impact. 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 RV, which is not considered to be an agricultural zone. The project site's land is also not under a Williamson Act Contract, nor is not surrounded by any such land. The closest preserve or Williamson Act Contract is approximately 4.9 miles southeast from the project site. Therefore, the project would not conflict with existing zoning for agricultural use, or 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 does 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 8.8 miles to the east of the Project site. Thus, due to distance, 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, do not contain any forest lands as defined in Public Resources Code section 12220(g), nor are not located near 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 a radius of one-quarter mile contain any active agricultural operations or lands designated as Prime Farmland, Unique Farmland, or Farmland of Local Importance as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency. The project site and surrounding area does contain Farmland of Statewide Importance, 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.

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
<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

An Air Quality assessment was prepared for the Project by Ldn Consulting on November 28<sup>th</sup>, 2018.

- 3(a) The GPU EIR concluded this impact to be less than significant. The RAQS and SIP are based on General Plans within the region and the development assumptions contained within them. The proposed Project is for the development of 39 residential units. The density allowed on the Project site per the County General Plan and the Zoning Ordinance is 48 units. Thus, the proposed Project is consistent with the density allowed under the General Plan and would not conflict with the RAQS or SIP.

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.

The air quality analysis accounts for both the construction and operational phases of the Project. The air quality impacts of the construction and operation phases were calculated

using the latest CalEEMod 2016.3.2 air quality model (model), which was developed by BREEZE Software for South Coast Air Quality Management District in 2017.

### **Construction**

Construction of the Project would be expected to begin with demolition of the existing residential structures followed by grading, utility trenching and building. Demolition would be expected to start in 2020 and completion of construction would be expected by mid to late 2020. Full buildout and full operations would be expected in 2022.

The model has been updated to reflect SDAPCD Rule 67 paint VOC limits and design features including the usage of Tier IV rated diesel equipment during grading and construction. Based on the model, the Project would not exceed County standards. According to the Air Quality Assessment, the project's emissions intensity would need to be increased by more than 14 times to generate significant effects.

In addition, all grading operations associated with the construction of the Project would be subject to the Grading Ordinance, which requires the implementation of dust control measures. Moreover, emissions from the construction phase would be temporary and localized.

### **Operation**

Operational sources of emissions would include area, energy, mobile, solid waste and water uses. All of the above sources were calculated within the model. In addition, the model was run for the winter and summer scenarios to determine operation impacts for the first year of operation.

The proposed Project would produce 312 trips per day. Based on the model, the Project would not exceed County operational air quality significance thresholds. In addition, the project would not result in the formation of carbon monoxide hotspots. No mitigation measures would be required.

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. The Project would contribute to particulate pollution (PM10), nitrogen oxide gases (NOx), and volatile organic compounds (VOCs) emissions from construction/grading activities; however, the incremental increase would not exceed established screening thresholds (see question 3(b) above).

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 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(d) The GPU EIR concluded this impact to be significant and unavoidable. The Project would introduce additional residential homes which are considered new sensitive receptors; however, the project site is not located within a quarter-mile of any identified point source

of significant emissions. Similarly, the Project does not propose uses or activities that would result in exposure of these sensitive receptors to significant pollutant concentrations and would not place sensitive receptors near any CO hotspots.

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 GPU EIR concluded this impact to be less than significant. The Project could produce objectionable odors during construction and operation of the residential components; however, these substances, if present at all, would only be in trace amounts (less than 1 µg/m<sup>3</sup>). Therefore, the Project would not create objectionable odors affecting a substantial number of people.

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.

Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
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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?

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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?

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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?

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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 corridors, or impede the use of native wildlife nursery sites?

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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?

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### Discussion

A Biological Resources Letter Report was prepared for the Project May 8<sup>th</sup>, 2018 by Helix Environmental Planning.

- 4(a) The GPU EIR concluded this impact to be significant and unavoidable. Based on the Biological Resources Letter Report prepared for the Project by Helix Environmental Planning on August 1, 2018, the Project site contains 2.15 acres of disturbed habitat and 1.03 acres of developed land, making the entirety of the approximately 3.2 acre site disturbed. No sensitive plant or animal species were observed or are expected to occur on the Project site.

As previously discussed, the GPU EIR determined impacts to special status species as significant and unavoidable. However, the proposed Project determined impacts to special status species 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.

- 4(b) The GPU EIR concluded this impacts to be significant and unavoidable. The Biological Resources Letter Report prepared for the Project identified no USACE or RWQCB jurisdictional wetland or non-wetland Waters of the U.S./ State, CDFW jurisdictional streambed or riparian habitat, and no areas identified as County Resource Protection Ordinance (RPO) Wetlands on the project site.

As previously discussed, the GPU EIR determined impacts to riparian habitat and other sensitive natural communities as significant and unavoidable. The proposed Project determined impacts 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.

- 4(c) The GPU EIR concluded this impact to be less than significant with mitigation. No federal wetlands as defined by Section 404 of the Clean Water Act would be impacted by the Project. As detailed in 4(b), the Biological Resources Letter Report prepared for the Project identified no USACE or RWQCB jurisdictional wetland or non-wetland Waters of the U.S./ State, CDFW jurisdictional streambed or riparian habitat, and no areas identified

as County Resource Protection Ordinance (RPO) Wetlands on the project site. Additionally, the Project site does not contain conditions that would support the formation or presence of Vernal Pools.

As previously discussed, the GPU EIR determined impacts to federally protected wetlands as less than significant with mitigation. The Project determined impacts to federally protected wetlands 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.

- 4(d) The GPU EIR concluded this impact to be significant and unavoidable. The Project site is surrounded by commercial and residential development and does not occur within any known corridors or linkages pursuant to the Biological Resources Letter Report prepared for the Project. The closest potential east-west corridor to the site would be the San Diego River, approximately 2.8 miles to the north, while the closest potential north-south movement area would be open space areas 2.9 miles to the east. Additionally, the Project site does not include any habitat suitable for raptor foraging.

The Project has a potentially significant impact to nesting migratory birds and/or raptors which requires mitigation to be reduced to less than significant.

#### **Mitigation Measures**

Consistent with GPU EIR mitigation measure Bio-1.5, the following project conditions will be implemented:

- The applicant shall conform to the breeding season avoidance measures pursuant to the Migratory Bird Treaty Act (MBTA) occurring January 15 to July 15 for raptors and February 15 to August 31 for general nesting birds

As previously discussed, the GPU EIR determined impacts to wildlife movement corridors as significant and unavoidable. The Project impacts were also determined to be potentially significant. However, the proposed Project would incorporate the GPU EIR mitigation measures Bio-1.5 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.

- 4(e) The GPU EIR concluded this impact to be less than significant. The project is consistent with the MSCP, Biological Mitigation Ordinance (BMO), and Resource Protection Ordinance (RPO). 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-1.5) would be applied to the Project, which will reduce Project impacts to less than significant.

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
<b>5. Cultural Resources</b> – 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 historian, Richard Carrico, it has been determined that structures onsite (1104, 1112, 1118, 1132, and 1136 North Anza Street) do not qualify as significant under CEQA and are not eligible for listing in the California Register of Historical Resources. The results of the evaluation are provided in an historical resources report titled, "Historic Resources Evaluation Report for the 1118 N Anza Street Townhomes Project, El Cajon, California (July 2018) prepared by Richard Carrico. Therefore, no impacts would occur with implementation of the proposed project.

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 archaeological resources report titled, "1118 N. Anza Street Townhomes Project; Cultural Resources Survey Report – Negative Findings", (Mary Robbins-Wade; June 2018).



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 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 Kumeyaay 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 that includes the following requirements:

#### Pre-Construction

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

#### Construction

- Monitoring. Both the Project Archaeologist and Kumeyaay Native American monitor are to be onsite during earth disturbing activities. The frequency and location of monitoring of native soils will be determined by the Project Archaeologist in consultation with the Kumeyaay Native American monitor. Both the Project Archaeologist and Kumeyaay Native American monitor will evaluate fill soils to ensure that they are negative for cultural resources
- If cultural resources are identified:
  - Both the Project Archaeologist and Kumeyaay Native American monitor have the authority to divert or temporarily halt ground disturbance operations in the area of the discovery.
  - The Project Archaeologist shall contact the County Archaeologist.
  - The Project Archaeologist in consultation with the County Archaeologist and Kumeyaay Native American shall determine the significance of discovered resources.
  - Construction activities will be allowed to resume after the County Archaeologist has concurred with the significance evaluation.
  - Isolates and non-significant deposits shall be minimally documented in the field. Should the isolates and non-significant deposits not be collected by the Project Archaeologist, the Kumeyaay Native American monitor may collect the cultural material for transfer to a Tribal curation facility or repatriation program.
  - If cultural resources are determined to be significant, a Research Design and Data Recovery Program shall be prepared by the Project Archaeologist in consultation with the Kumeyaay Native American monitor and approved by the County Archaeologist. The program shall include reasonable efforts to preserve (avoid) unique cultural resources of Sacred Sites; the capping of identified Sacred Sites or unique cultural resources and placement of development over the cap if avoidance is infeasible; and data recovery for non-unique cultural resources. The preferred option is preservation (avoidance).
- Human Remains.
  - The Property Owner or their representative shall contact the County Coroner and the PDS Staff Archaeologist.
  - Upon identification of human remains, no further disturbance shall occur in the area of the find until the County Coroner has made the necessary findings as to origin.

- If the remains are determined to be of Native American origin, the Most Likely Descendant (MLD), as identified by the Native American Heritage Commission (NAHC), shall be contacted by the Property Owner or their representative in order to determine proper treatment and disposition of the remains.
- The immediate vicinity where the Native American human remains are located is not to be damaged or disturbed by further development activity until consultation with the MLD regarding their recommendations as required by Public Resources Code Section 5097.98 has been conducted.
- Public Resources Code §5097.98, CEQA §15064.5 and Health & Safety Code §7050.5 shall be followed in the event that human remains are discovered.

#### Rough Grading

- Upon completion of Rough Grading, a monitoring report shall be prepared identifying whether resources were encountered. A copy of the monitoring report shall be provided to the South Coastal Information Center and any culturally-affiliated tribe who requests a copy.

#### Final Grading

- A final report shall be prepared substantiating that earth-disturbing activities are completed and whether cultural resources were encountered. A copy of the final report shall be submitted to the South Coastal Information Center and any culturally-affiliated tribe who requests a copy.
- Artifact 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 located on Quaternary Alluvium geological

formations that potentially contain unique paleontological resources. Proposed grading would include less than 2,500 cubic yards of excavation.

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

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 as potentially significant. However, the proposed Project would incorporate the GPU EIR mitigation measures Cul-3.1 for a less than significant impact with mitigation. 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. Also see section 5(b) above for mitigation measures for inadvertent discoveries.

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 and Cul-3.1) 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.

## Conclusion

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

1. No peculiar impacts to the project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. Feasible mitigation measures contained within the GPU EIR will be applied to the project.

Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
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## 6. Geology and Soils – Would the Project:

- a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving: (i) rupture of a known earthquake fault, (ii) strong

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seismic ground shaking or seismic-related ground failure,  
(iii) liquefaction, and/or (iv) landslides?

- |   |                          |                          |                          |
|---|--------------------------|--------------------------|--------------------------|
| 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

A Geotechnical Investigation has been prepared for the Project May 10<sup>th</sup>, 2018 by Geocon Incorporated.

- 6(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 Newport-Inglewood and Rose Canyon Faults, located approximately 14 miles west of the Project are the closest known active faults to the site.
- 6(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. Therefore, compliance with the California Building Code and the County Building Code would ensure that the Project would not result in a significant impact.
- 6(a)(iii) The GPU EIR concluded this impact to be less than significant. The project site is within a "Potential Liquefaction Area" as identified in the County Guidelines for Determining Significance for Geologic Hazards. A Geotechnical Investigation for the Project prepared by GEOCON dated May 2018 indicated that the potential for liquefaction and/or seismically induced settlement occurring within site soils is very low to negligible due to geological conditions and absence of groundwater on the Project site. Therefore, there will 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.
- 6(a)(iv) The GPU EIR concluded this impact to be less than significant. The site is located within a "Landslide Susceptibility Area" as identified in the County Guidelines for Determining Significance for Geologic Hazards and considered to be Marginally Susceptible. However, the Investigation indicated no presence of landslide deposits or other significant forms of

mass wasting. No adverse geologic structures that would preclude Project feasibility were encountered on the site.

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 with the incorporation of Project conditions for a geological soils report, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 6(b) The GPU EIR concluded this impact to be less than significant. The soils on-site have been identified as alfisols that have a soil erodibility rating of severe. According to the Geotechnical Investigation has been prepared for the Project May 10<sup>th</sup>, 2018 by Geocon Incorporated, the Project site is underlain by colluvium and granitic rock. 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.

- 6(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 indicated no presence of landslide deposits or other significant forms of mass wasting. The proposed Project involves earthwork including the cut of 720 CY, 18,190 CY of fill, and import of 17,470 CY of fill that would result in the creation of areas of cut and areas underlain by fill. In order to assure that any proposed buildings 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.

- 6(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 May 10<sup>th</sup>, 2018 by Geocon Incorporated, the Project site is underlain by expansive soils. 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. In addition, an on-site Geological Monitor would be required to perform geotechnical observation and/or laboratory testing to ensure all compressible soils are removed.

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.

- 6(e) The GPU EIR concluded this impact to be less than significant. The project will rely on public water and sewer for the disposal of wastewater. No septic tanks or alternative wastewater disposal systems are proposed.

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.

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

## Discussion

- 7(a) The project would produce GHG emissions through construction activities, vehicle trips, and residential fuel combustion. However, the project falls below the screening criteria that were developed to identify project types and sizes that would have less than

cumulatively considerable GHG emissions (i.e., the project would result in less than 50 single-family residential units).

The San Diego County Recommended Approach for Addressing Climate Change (2015) uses screening thresholds for determining the need for additional analysis. Screening thresholds are recommended based on various land use densities and project types. Projects that meet or fall below the screening thresholds are expected to result in 900 MT/year of GHG emissions or less and would not require additional analysis. The 50-unit standard for single-family residential land use would apply to the proposed project.

The project proposed the development of 39 units and would therefore fall below the screening criteria of 50 units. For projects of this size, it is presumed that the construction and operational GHG emissions would not exceed 900 MT CO<sub>2</sub>e per year, and there would be a less-than cumulatively considerable impact. This assumes that the project does not involve unusually extensive construction and does not involve operational characteristics that would generate unusually high GHG emissions. In addition, the project is consistent with the density established by the General Plan of 48 units and would only develop 39 units.

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

### Conclusion

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

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
<b>8. Hazards and Hazardous Materials – Would the Project:</b>			
a) Create a significant hazard to the public or the environment through the routine transport, storage, use, or disposal of hazardous materials or wastes or through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, or is otherwise known to have been subject to a release of hazardous substances	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

and, as a result, would it create a significant hazard to the public or the environment?

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

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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?

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

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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?

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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?

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### Discussion

An Environmental Site Assessment Report was prepared for the Project March 18<sup>th</sup>, 2018 by Geocon Incorporated.

- 8(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. One inactive on-site well would be removed and inspected by County Department of Environmental Health (DEH). In addition, the existing on-site septic system that serves one of the single-family residences (to be demolished prior to construction) would be abandoned under the DEH guidelines.

The Project is required to comply with the conditions of approval and applicable regulations to ensure that impacts related to the disposal of hazardous materials from the removal of structures (wells, septic system, existing residence) is less than significant.

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.

- 8(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.

- 8(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.

- 8(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. The Project site is approximately 1.3 miles from Gillespie Field, and located within the FAA Notification Zone and the Airport Influence Area for Gillespie Field. The FAA reviewed the proposed project and provided a letter stating the applicant must notify the FAA within five days after construction reaches its greatest height. The project would be conditioned to comply with this requirement. Therefore, the Project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR. Also, the project does not propose construction of any structure equal to or greater than 150 feet in height, constituting a safety hazard to aircraft and/or operations from an airport or heliport.

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.

- 8(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.

- 8(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.

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

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

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

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

8(g) The GPU EIR concluded this impact as significant and unavoidable. The proposed project is not located within a County identified Wildlife Urban Interface (WUI) zone. A WUI is defined as an area where development is in proximity to open space or lands with native vegetation and habitat that are prone to brush fires. In addition, CAL FIRE has mapped areas of significant fire hazards throughout the state and classifies lands different Fire Hazard Severity Zones (FHSZ) based upon fuels, terrain, weather, and other relevant factors. The Project Site is not adjacent to wildland and is completely surrounded by urbanized areas. In addition, the site has been designated by CAL FIRE as Urban Unzoned infill development.

A Fire Service Availability Letter dated July 27, 2018 and October 29, 2019 has been received from the San Miguel Consolidated Fire Protection District (SMFPD). The conditions from the SMFPD include automatic fire sprinkler systems, site inspections, premises identification (street numbers), fire apparatus access requirements (including driveways), fire hydrants, vegetation clearing, and a fair share contribution, all subject to review and approval by the SMFPD. The Fire Service Availability Letter indicates the site location is approximately 1.2 miles from SMFPD Station #19. The expected emergency travel time to the project site would meet the maximum travel time allowed pursuant to the Safety Element of five (5) minutes.

Also, 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, Tentative Parcel Map, 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 SMFPD 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.

- 8(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.

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
<b>9. Hydrology and Water Quality – Would the Project:</b>			
a) Violate any waste discharge requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Is the project tributary to an already impaired water body, as listed on the Clean Water Act Section 303(d) list? If so, could the project result in an increase in any pollutant for which the water body is already impaired?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Could the proposed project cause or contribute to an exceedance of applicable surface or groundwater receiving water quality objectives or degradation of beneficial uses?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

Technical studies were prepared for the project related to hydrology and water quality:

(1) A Priority Development Project (PDP) Storm Water Quality Management Plan (SWQMP) dated December 17, 2019, prepared by SB&O, Inc.

(2) A Drainage Study dated December 17, 2019, prepared by SB&O, Inc.

(3) A Hydrology and Hydraulic Review dated August 12<sup>th</sup>, 2019, prepared by SB&O, Inc.

9(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.

#### Conditions of Approval

The following list includes the Project conditions of approval:

#### **Storm Water Pollution Prevention Plan**

- A SWPPP would be prepared in accordance with the National Pollutant Discharge Elimination Systems Construction General Permit adopted by the State Water Resources Control Board.

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 with the implementation of Project conditions as detailed above. 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.

- 9(b) The GPU EIR concluded this impact to be significant and unavoidable. The project lies in the El Cajon (907.13) 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 and Forrester Creek watersheds include coliform bacteria, nutrients, sediment, lowered dissolve oxygen, and trace metals. The project could contribute to release of these pollutants; however, the project will comply

with the WPO and implement site design measures, source control BMPs, and treatment control BMPs to prevent a significant increase of pollutants to receiving waters.

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 with mitigation (Hyd-1.2 through Hyd-1.5) to water quality standards and requirements. 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(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 with mitigation to water quality standards and requirements and groundwater supplies and recharge (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.

9(d) The GPU EIR concluded this impact to be significant and unavoidable. The project will obtain its water supply from the Helix Water District that obtains water from surface reservoirs or other imported sources. The Project would not use any groundwater, and the existing well on the Project site would be destroyed and inspected by County Department of Environmental Health (DEH). In addition, the project 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.

9(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 overland in a southwesterly direction and ultimately discharges into the Mollison Avenue storm drain inlet and into the Broadway flood control channel. To avoid concentrated discharge impacts, including substantial erosion or siltation on or off-site, on-site improvement would include the following: raising the site elevation with retaining walls at the north, west and south property lines and implementing yard swales, private street gutters, and two biofiltration basins with storm drains. With the above improvements, flows would be redirected to the Anza Street storm drain line and

conveyed directly to the Broadway flood control channel located 300 feet south of the project site either via an existing County of San Diego owned concrete box culvert or via a new connection point downstream of the culvert within the Broadway flood control channel. Neither connection option will result in a significant impact beyond what was analyzed in the GPU EIR.

Off-site improvements would include new sidewalk, curb and gutter, and tree wells on Anza Street. The tree wells would provide treatment and HMP controls. A new 18" RCP storm drain line would also be installed within N. Anza Street to convey post development runoff directly to the Broadway channel. Existing drainage patterns would be maintained off-site.

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 July 31, 2019, prepared by Project Design Consultants, 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. Although on-site drainage patterns would be altered, the proposed improvements would ensure the project would not result in substantial erosion or siltation on or off-site.

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.

- 9(f) The GPU EIR concluded this impact to be less than significant with mitigation. Drainage Study prepared by SB&O on December 17, 2019 determined that the proposed Project would not alter the existing drainage pattern in a manner which would result in flooding on- or off-site. Redevelopment of the Project site would direct runoff easterly toward N. Anza Street for treatment and hydromodification management. The Project would result in an increased runoff volume during large storm events which could result in concentrated surface discharge to downstream properties. In order to prevent flooding on or off-site, on-site curb inlets would be designed to handle the 50-year storm event and a public storm drain system in N. Anza Street would be constructed by the Project to convey runoff to the existing box culvert at the Broadway flood channel. The Project's proposed drainage patterns would result in less than significant impacts to the properties downstream of the Project site. Additionally, the Project Site is not located within a 100-year flood hazard area.

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

to flooding with the incorporation design features and improvements. Therefore, the Project would be consistent with the analysis within the GPU EIR because it would not increase impact identified within the GPU EIR.

- 9(g) The GPU EIR concluded this impact to be less than significant with mitigation. Pursuant to the Hydrology and Hydraulic Review prepared by SB&O on October 15<sup>th</sup>, 2019, and described in response 9(e), the proposed Project would alter the existing on-site drainage pattern. However, specific site improvements identified in response 9(e) would be implemented to ensure no impacts would occur. The Project would ultimately discharge from the site into the Broadway flood control channel. Pursuant to the Broadway Flood Channel Hydrology and Hydraulic Review, the Anza Street culvert, which is part of the Broadway Flood Control Channel, has adequate capacity to pass the estimated 100-year peak flow, as estimated by the County of San Diego Unit Hydrograph Methodology. 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.

- 9(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 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.

- 9(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. 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.

- 9(j) 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 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.



9(k) The GPU EIR concluded this impact to be less than significant with mitigation. The project site lies outside 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.

9(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.

9(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.

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

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

## Conclusion

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.

Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
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## 10. Land Use and Planning – Would the Project:

- a) Physically divide an established community? ☐ ☐ ☐
- b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect? ☐ ☐ ☐

### Discussion

- 10(a) The 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. The Project is infill development consistent with the allowed density of 46 units per the County of San Diego General Plan. The Project would develop 39 residential units; therefore, buildout of the site was anticipated in the GPU.

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.

- 10(b) The GPU EIR concluded this impact to be less than significant. The proposed project requires a Rezone to change the Building Type designator from "F", which allows for duplex and stacked single-family residences, to "K" to allow for multi-family residential development, and establish an Open Space designator of "J" to allow for 350 square feet of Private and 150 square feet of Group Usable Open Space per dwelling unit. A Land Use Consistency Memorandum was prepared for the Project dated August 2018 and has been accepted for the project. The analysis within the Land Use Consistency Memorandum found that the proposed project would not conflict with any applicable goals, policies, and objectives of the General Plan, Specific Plan or Lakeside Community Plan. Therefore, the Project would not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the Project adopted for the purposes of avoiding or mitigating an environmental effect.

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.

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
<b>11. Mineral Resources – Would the Project:</b>			
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- 11(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 densely developed land uses including residential, commercial and industrial 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.

- 11(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 of 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
<b>12. Noise – Would the Project:</b>			
a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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"/>

### Discussion

A Noise Report was prepared for the Project dated July 26, 2018 by Ldn Consulting Inc.

- 12(a) The GPU EIR concluded this impact to be less than significant with mitigation. The area surrounding the Project site consists of parcels zoned Variable Residential (RV) in the unincorporated County to the north, east, and south, and parcels zoned Residential Multi-Family (RM-2200 and RM-2500) to the west. The Project would 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) or increase of 10 dB (CNEL) over pre-existing noise. 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. The project is subject to the County Noise

Element which allows a noise exposure level of 65 dBA CNEL at any proposed noise sensitive multi-family residence lot. Based on a review of the County's noise contour maps and the Noise Report by Ldn Consulting Inc. dated July 26, 2018, the primary noise sources to impact the site are from vehicular traffic along Broadway and N. Mollison Avenue and aircraft noise from nearby Gillespie Field Airport. Based on the report, with the worst- case scenario, the exterior noise level is 63.1 dBA, which is in conformance with the Noise Elements, therefore mitigation measures are not required. However, interior noise will be reduced to conformance of 45 dBA with the incorporation of specific construction design.

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 site is zoned Variable Residential (RV) that has a one-hour average sound limit of 50 dBA daytime and 45 dBA nighttime. The adjacent properties are zoned Variable Residential (RV) in the unincorporated County to the north, east, and south and Residential Multi-Family (RM-2200 and RM-2500) to the west. The project does not involve any noise producing equipment that would exceed applicable noise levels at the adjoining property line.

Noise Ordinance – Section 36.408, 36.409, and 36.410: The Project would not generate construction noise in excess of Noise Ordinance standards. Construction operations would occur only during permitted hours of operation. General construction equipment operations with the incorporation of design measures would comply with County noise requirements. Section 36.409 of the County Noise Ordinance states that construction noise shall not exceed 75 dBA at the property line during an eight-hour period between 7 a.m. to 7 p.m. The construction equipment will be spread out over the project site from distances of 300 feet or more. Majority of the grading will occur more than 150 feet away from the property lines. At the average distance of 135 feet, the noise level would be in compliance with the Noise Ordinance of 75 dBA. No impulsive construction equipment is proposed. The smallest construction equipment feasible would be used to minimize noise. Therefore, project construction would not exceed Section 36.409 construction noise limits, and no mitigation would be required.

For a list of Project conditions, please see below.

#### Project Conditions

The following are the Project's conditions:

#### **Noise Ordinance Compliance**

- All operational activities related to the Project will be required to comply with the one-hour sound level limit property line requirement pursuant to the County Noise Ordinance, Section 36.404.

#### **Temporary Construction Noise**

- The project shall comply with the following temporary construction noise control measures and shall comply with the eight hour average sound level of 75 dBA pursuant to Noise Ordinance Section 36.408 & 36.409:
  - a. Turn off equipment when not in use.

- b. Equipment used in construction should be maintained in proper operating condition, and all loads should be properly secured, to prevent rattling and banging.
- c. Use equipment with effective mufflers
- d. Minimize the use of back up alarm.
- e. Equipment staging areas should be placed at locations away farthest away from noise sensitive receivers as deemed feasible.
- f. Temporary construction equipment operations shall comply with the County Noise Ordinance Sections 36.408, 409, and 410.

### **Noise Control Design Measures**

- The applicant shall construct a six-foot noise barrier at the northern, southern, and western property lines where Noise Sensitive Land Use would be exposed to noise levels that exceeds the allowable limit pursuant Noise Ordinance, Section 36.404. The barrier shall be at the height specified of 6 foot. Barriers may be constructed vinyl, ¾ inch or thicker consisting of solid panels on minimum 4x4 posts with no cracks or gaps through or below and all seams or cracks will be filled or caulked.

As previously discussed, the GPU EIR determined impacts from excessive noise levels to be less than significant with mitigation. The Project would have a less-than-significant impact with the incorporation of design features and conditions. Therefore, the Project would be consistent with the analysis 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 less than significant with mitigation. The Project includes residential uses which are sensitive to low ambient vibration. However, the residences would be setback 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). 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 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.
- 12(c) As indicated in the response listed under Section 12(a), the project would not expose existing or planned noise sensitive areas in the vicinity to a substantial permanent increase in noise levels that exceed the allowable limits of any applicable noise standards. Also, the project is not expected to expose existing or planned noise sensitive areas to noise 10 dB CNEL over existing ambient noise levels. Based on a Noise Assessment prepared for the Project by Ldn Consulting on July 26<sup>th</sup>, 2018, the Project would not create a direct impact or cumulative noise increase of 3 dBA Community Noise Exposure Level (CNEL) or more to off-site roadway segments, and thus would not cause any significant impacts to any existing or future noise sensitive land uses (NSLU).

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 with no required mitigation 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.

- 12(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. Also, the project will not operate construction equipment in excess of 75 dB for more than an 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. However, the proposed Project would have a less than significant impact with specific Project conditions (listed in response 13(a)). Therefore, the Project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.
- 12(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. The Project site is approximately 1.3 miles from a Gillespie Field, and located within the FAA Notification Zone and the Airport Influence Area for Gillespie Field. However, the proposed use is compatible with the uses allowed in the Airport Influence Area and will not subject residents to excessive noise. Therefore, the Project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.
- 12(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. 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.

<b>Significant Project Impact</b>	<b>Impact not identified by GPU EIR</b>	<b>Substantial New Information</b>
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## 13. Population and Housing – Would the Project:

- |   |                          |                          |                          |
|---|--------------------------|--------------------------|--------------------------|
| a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

### Discussion

13(a) The GPU EIR concluded this impact to be less than significant. The Project site is designated in the General Plan as Village Residential (VR-15). A total of 48 residential units could be developed under this designation. Development of the project would include 39 multi-family residential units. The Project proposes a Rezone to change the Building Type from designator "F", which allows for duplex and stacked single-family residences to "K" to allow for multi-family dwellings on the same lot. The Lakeside Community Plan requires that multi-family development be concentrated in central Lakeside, and that all high-density residential development be confined to areas that have all necessary public facilities. The Project proposes infill development, meeting the criteria set by the Lakeside Community Plan. Moreover, the regulatory change does not increase density or intensity of land use that is inconsistent with the General Plan

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.

13(b) The GPU EIR concluded this impact to be less than significant. The Project would not displace substantial numbers of existing housing. Four single-family residences will be demolished as part of the Project. The Project would develop 39 residential units. As such, 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.

13(c) The GPU EIR concluded this impact to be less than significant. The Project would not displace a substantial number of people, as only 4 single family residences will be demolished. The addition of 39 dwelling units will yield a net gain of available housing. As such, replacement housing would not be required elsewhere.

As previously discussed, the GPU EIR determined impacts from displacement of people 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 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.

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

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

☐☐☐**Discussion**

14(a) The 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 Helix Water District. Sewer service would be provided by San Diego County Sanitation. Minor pipeline extensions would be required to serve the project site for both water and sewer services.

Fire and emergency protection would be provided by the San Miguel Consolidated Fire Protection District (SMFPD). The nearest fire station is SMFPD's Fire Station #19, located at 727 E Bradley Avenue in unincorporated El Cajon. This station was completed in 2018 and has sufficient capacity to serve the Project.

Pursuant to the Project availability forms, students living within this community would attend schools of the Cajon Valley Union School District and Grossmont Union School District. The elementary school serving this site would be Magnolia Elementary. The middle school would be Greenfield Middle School. High school students would attend El Cajon Valley High School. The Project applicant would pay for all applicable school fees to the Cajon Valley Union and Grossmont Union School Districts.

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.

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

## Discussion

15(a) The 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 associated with the Lakeside Local Planning Area.

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.

15(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.

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
<b>16. Transportation and Traffic – Would the Project:</b>			
a) Conflict with an applicable plan, ordinance or policy establishing measures of the effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths and mass transit?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

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### Discussion

A Traffic Impact Study was prepared for the Project by LOS Engineering, Inc. date July 25<sup>th</sup> of 2018. The Project has frontage on N. Anza Street. Improvements will be constructed to maintain existing conditions as it relates to existing design features.

- 16(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 measures 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 study, 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 312 primary 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:

Level of Service Ranges			
Level of Service	Roadway Segments – Average Daily Traffic (ADT) Volume <sup>1</sup>	Signalized Intersections – Delay (Seconds/Vehicle) <sup>2</sup>	Unsignalized Intersections – Delay (Seconds/Vehicle) <sup>2</sup>
A	Less Than 1,900	Less Than or Equal to 10.0	Less Than or Equal to
B	1,901 to 4,100	10.1 to 20.0	10.1 to 15.0
C	4,101 to 7,100	20.1 to 35.0	15.1 to 25.0
D	7,101 to 10,900	35.1 to 55.0	25.1 to 35.0
E	10,901 to 16,200	55.1 to 80.0	35.1 to 50.0
F	Greater Than 16,200	Greater than 80.0	Greater than 50.0
<sup>1</sup> The volume ranges are based on the County of San Diego Circulation Element of a Light Collector, the average d vided in Appendix A. <sup>2</sup> Highway Capacity Manual (HCM).			

According to the Traffic Impact Study, all study elements were calculated to operate at LOS C or better. 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. Since the project is located within the Lakeside Transportation Impact Fee (TIF) area, the applicant would be

required to pay into the TIF program to mitigate any potential cumulative impacts prior to issuance of building permits.

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 payment into the TIF program, consistent with the GPU EIR 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.

16(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.

16(c) 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. The Project is located within Airport Influence Area 2 and is located within an Airport Safety Zone and an Overflight Area (Gillespie Field). An FAA notification was completed for the Project on September 4<sup>th</sup>, 2018, and the applicant would be required to notify the FAA prior to occupancy.

#### Project Conditions

The proposed Project would need to record an Overflight Agreement with the Gillespie Field Airport Authority.

As previously discussed, the GPU EIR determined impacts to air traffic patterns to be less than significant with mitigation. However, the Project would have a less-than-significant impact with the incorporation of conditions. The Project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

16(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. The proposed road improvements include removing and replacing the existing infrastructure, and no change in design of the roadway is required.

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.

16(e) The GPU EIR concluded this impact to be less than significant with mitigation. A project availability form has been received from the SMFPD dated March 6<sup>th</sup>, 2018 indicating that

there is adequate capacity to serve the project with an approximate response time of 5 minutes. In addition, consistent with GPU EIR mitigation measure Tra-4.2, the Project would implement the Building and Fire Codes to ensure there are adequate service levels in place associated with the construction of structures and their accessibility and egress.

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.

- 16(f) The GPU EIR concluded this impact to be less than significant with mitigation. The project will not result in the construction of any road improvements or new road design features that would interfere with the provision of public transit, bicycle or pedestrian facilities. In addition, the project does not generate sufficient travel demand to increase demand for transit, pedestrian or bicycle facilities. Improvements will be constructed to maintain existing conditions as it relates to pedestrian and bicyclists.

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-4.2) would be applied to the Project. The mitigation measures, as detailed above, would require the Project applicant to comply with the County Public Road Standards, Guidelines for Determining Significance, County TIF Ordinance, coordinate with other jurisdictions to identify appropriate mitigation and implement the Building and Fire Codes to ensure adequate services are in place.

## 17. Utilities and Service Systems – Would the Project:

a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

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☐

b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing

☐
☐
☐

Significant  
Project  
Impact

Impact not  
identified by  
GPU EIR

Substantial  
New  
Information

facilities, the construction of which could cause significant environmental effects?

c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

☐ ☐ ☐

d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

☐ ☐ ☐

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

☐ ☐ ☐

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

☐ ☐ ☐

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

☐ ☐ ☐

## Discussion

- 17(a) The GPU EIR concluded this impact to be less than significant with mitigation. The Project would discharge domestic waste to a community sewer system that is permitted to operate by the Regional Water Quality Control Board (RWQCB). A Project facility availability form has been received from San Diego County Sanitation (Winter Gardens Service Area) that indicates that there is adequate capacity to serve the Project.

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.

- 17(b) The GPU EIR concluded this impact to be less than significant with mitigation. The Project involves new water and wastewater pipeline extensions. However, these extensions would not result in additional adverse physical effects beyond those already identified in other sections of this environmental analysis.

Sewer service will be provided by San Diego County Sanitation, while water service will be provided by the Helix Water District. A project availability form has been received from the Helix Water District indicating that there is adequate capacity to serve the project.

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.

- 17(c) The GPU EIR concluded this impact to be less than significant with mitigation. The Project involves new storm water drainage facilities (yard swales, private street gutters, 2 basins, and a private 18" diameter storm drain line). 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.

- 17(d) The GPU EIR concluded this impact to be significant and unavoidable. A Service Availability Letter from the Helix 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.

- 17(e) The GPU EIR concluded this impact to be less than significant with mitigation. A Service Availability Letter from San Diego County Sanitation has been provided, which indicates that there is adequate wastewater capacity to serve the Project.

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 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.

- 17(f) The GPU EIR concluded this impact to be less than significant. 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.

- 17(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, 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.

**Attachments:**

Appendix A – References

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

## Appendix A

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

Butcher, Allen L.; SB&O Inc., (August 2019), Broadway Flood Channel Hydrology & Hydraulic Review

Butcher, Allen L.; SB&O Inc., (December 2019), Priority Development Project SWQMP

Carrico, Richard; Recuerdos Research, Mengers, Douglas W.; PanGIS, Inc., (July 2018), Historic Resources Evaluation Report

Geocon Incorporated, (May 2018), Geotechnical Investigation

Geocon Incorporated, (March 2018), Phase I Environmental Site Assessment Report

Santa Cruz, Sean; Hall Land Company, Inc. (August 2018), Land Use Consistency Memorandum

Helix Environmental Planning, Inc., (May 2018), Biological Resources Letter Report for the 1118 N. Anza Street Townhomes Project

Helix Environmental Planning, Inc., (June 2018), Cultural Resources Survey Report-Negative Findings

Louden, Jeremy; Ldn Consulting, Inc., (November 2018), Air Quality Assessment

Louden, Jeremy; Ldn Consulting, Inc., (n.d.), Appendix A: Final Climate Action Plan Consistency Review Checklist

Louden, Jeremy; Ldn Consulting, Inc., (July 2018), Noise Assessment

Ott, Stephen C.; SB&O Inc., (December 2019), Preliminary Drainage Study

Rasas, Justin; LOS Engineering, Inc., (July 2018) Traffic Impact Study

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)