



# County of San Diego

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January 6, 2022

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

**Project Name:** Clark Site Plan  
**Project Record Numbers:** PDS2020-STP-20-008  
**Environmental Log Number:** PDS2020-ER-09-008

**APN(s):** 186-280-03

**Lead Agency Name and Address:**  
County of San Diego  
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**Project Location:**  
The project is located at 27350 Valley Center Road, south of the intersection of Rinehart Lane and Valley Center Road in the community of Valley Center, San Diego County, California.

**Project Applicant Name and Address:**

VC Professionals LLC  
14219 Cool Valley Road  
Valley Center, California 92082

**General Plan**  
Community Plan: Valley Center Community Plan  
Regional Categories: Village  
Land Use Designations: Village Residential (Vr-2) and General Commercial  
Density: 2du/acre  
Floor Area Ratio (FAR) N/A

**Zoning**

Use Regulation: Commercial (C36) and Rural Residential (RR)  
Minimum Lot Size: 1ac/6000  
Special Area Regulation: B

**Description of Project:**

VC Professionals LLC (Applicant) proposes the Clark Vet and Dental Clinic Project (Project). The Project includes construction of two separate commercial buildings consisting of a 5,000-square-foot veterinary clinic and a 3,240-square-foot dental clinic on an existing vacant 2.52-acre parcel. A bio-retention basin and a total of 56 on-site parking stalls, including 6 electric vehicle stalls, would also be constructed on site. Offsite improvements include the removal of existing driveway opening on the southeast end and a new driveway opening on the northeast connecting to Valley Center Road

Discretionary Actions:

Discretionary permits for the Project include a Site Plan for Community Design Review.

**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 of San Diego (County). The SDCWA service area covers approximately the western one third of the unincorporated County. The SDWCA boundary generally represents where water and wastewater infrastructure currently exist. This area is more developed than the eastern areas of the unincorporated County and would accommodate more growth under the GPU.

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

### **Summary of Findings**

The Project is consistent with the analysis performed for the GPU EIR. Further, the GPU EIR adequately anticipated and described the impacts of the Project, identified applicable mitigation measures necessary to reduce Project specific impacts, and the Project implements these mitigation measures (see [https://www.sandiegocounty.gov/content/dam/sdc/pds/gpupdate/docs/BOS\\_Aug2011/EIR/FEIR\\_7.00 - \\_Mitigation\\_Measures\\_2011.pdf](https://www.sandiegocounty.gov/content/dam/sdc/pds/gpupdate/docs/BOS_Aug2011/EIR/FEIR_7.00_-_Mitigation_Measures_2011.pdf) for complete list of GPU Mitigation Measures.

A comprehensive environmental evaluation has been completed for the Project as documented in the attached §15183 Exemption Checklist. This evaluation concludes that the Project qualifies for an exemption from additional environmental review because it is consistent with the development density and use characteristics established by the County of San Diego General Plan, as analyzed by the San Diego County General Plan Update Final Program EIR (GPU EIR, ER #02-ZA-001, SCH #2002111067), and all required findings can be made.

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

- 1. The Project is consistent with the development density established by existing zoning, community plan or general plan policies for which an EIR was certified.**  
The Project would construct a veterinary clinic, dental clinic and parking on an existing vacant lot. The property resides within a residential/commercial split zone with rural residential on the western portion of the site and commercial to the east. Only parking would occupy the rural residential area of the site. The two office buildings would be constructed on the portion of the site that is zoned for commercial. Therefore, the project is consistent with the use types envisioned for the site by the General Plan.

**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 commercial lots with associated accessory uses. The property does not support any peculiar environmental features, and the Project would not result in any peculiar effects.

In addition, as explained further in the 15183 Exemption Checklist below, all project impacts were adequately analyzed by the GPU EIR. The Project could result in potentially significant impacts to air quality, biological resources, cultural resources, hazards and hazardous materials, hydrology and water quality, transportation and traffic, and wildfire. However, applicable mitigation measures specified within the GPU EIR have been made conditions of approval for this Project.

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

The Project is consistent with the density and use characteristics of the development considered by the GPU EIR. The GPU EIR considered the incremental impacts of the Project, and as explained further in the 15183 Exemption Checklist below, no potentially significant off-site or cumulative impacts have been identified which were not previously evaluated.

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

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

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

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

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Signature

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Date

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**Jessica Madamba**

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**Project Manager**

Printed Name

Title

## CEQA Guidelines §15183 Exemption Checklist

### Overview

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

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

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

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

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

- |  |                          |                          |                          |
|--|--------------------------|--------------------------|--------------------------|
| a) Have a substantial adverse effect on a scenic vista?  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| c) Substantially degrade the existing visual character or quality of the site and its surroundings?  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| d) Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?                                   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

**Discussion**

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

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

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

The Project site is located on a vacant parcel on the west side of Valley Center Road and approximately 400 feet north of Woods Valley Road, within the Valley Center Community Plan Area in the unincorporated County of San Diego. The Lancaster Mountain-Keys Canyon is the closest RCA identified by the County of San Diego General Plan or Valley Center Community Plan located within the vicinity of the Project site. However, this RCA is located to the north and is not visible from the Project location.

There are no existing community trails or paths in the immediate vicinity of the Project site. Additionally, the Project is consistent with existing commercial land uses and, therefore,

the Project would not detract from existing views from an adopted County or State trail system.

As previously discussed, the GPU EIR determined impacts on scenic vistas to be less than significant with mitigation. 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.

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

The Project site is not within the vicinity of a State Designated Scenic Highway. 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. There are no designated scenic roadways located in the vicinity of the Project site.

As previously discussed, the GPU EIR determined impacts on scenic resources to be less than significant with mitigation. 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.

- 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 currently vacant. The surrounding land is either rural residential, commercial or undeveloped land. The undeveloped land south and west of the site includes open fields and oak tree covered hillsides. Commercial structures adjoin the site immediately to the north and south. The Project would be constructed between two existing commercial buildings, a single-story auto parts store to the north and a two-story mixed-use facility to the south. Both buildings are currently occupied.

The Project would not detract from, or contrast with the existing visual character and/or quality of the surrounding areas for the following reasons: the Project is consistent with the General Plan density allowed on-site and the Project is in conformance with the Valley Center Community Plan, and the Project site is located within a developed area. Additionally, the location, size, and design of the proposed use would be compatible with uses in the immediate area. The Project is similar to surrounding land use types.

As previously discussed, the GPU EIR determined impacts on visual character or quality to be significant and unavoidable. 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 Project would use outdoor lighting and is located within Zone A as identified by the San Diego County Light Pollution Code, approximately 65 miles from the Mount Laguna Observatory and approximately 46 miles from Palomar Observatory. However, the Project would not adversely affect nighttime views or astronomical observations, because the Project would conform to the Light Pollution Code (Section 51.201-51.209), including the Zone A 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 of light pollution on nighttime views. Compliance with the Code would be required prior to issuance of a building permit. Thus, the 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. 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.

**Conclusion**

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

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

<b>Significant Project Impact</b>	<b>Impact not identified by GPU EIR</b>	<b>Substantial New Information</b>
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**2. Agriculture/Forestry Resources** - Would the Project:

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

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

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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- c) Conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland zoned Timberland Production?
- d) Result in the loss of forest land, conversion of forest land to non-forest use, or involve other changes in the existing environment, which, due to their location or nature, could result in conversion of forest land to non-forest use?
- e) Involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Important Farmland or other agricultural resources, to non-agricultural use?

**Discussion**

2(a) The GPU EIR concluded this impact to be significant and unavoidable. County agricultural specialist staff analyzed agricultural resources on the Project site. The Project site has been mapped by the Farmland Mapping and Monitoring Program as “other land” and “Urban Builtup Land”, which are not considered significant agricultural land in the County of San Diego. The site contains an existing paved area with no existing agricultural uses.

Pursuant to the County Guidelines for Determining Significance, Agricultural Resources to be considered an important agricultural resource under the Local Agricultural Resource Assessment (LARA) model, no primary factor (soil, climate, water) may be rated “low.”. The Project site does not contain infrastructure connections or an existing well that project would receive a water rating of “low.”. Therefore, the Project site would not be considered an important agricultural resource and no mitigation would be required for direct impacts.

As previously discussed, the GPU EIR determined impacts from direct and indirect conversion of agricultural resources to be significant and unavoidable. The Project would have a less than significant direct and indirect impact for the reasons detailed above. 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 Commercial and Rural Residential, which is not within an agricultural zone. In addition, the Project site is not within an agricultural preserve or a Williamson Act Contract. The closest Contract or Preserve is located approximately 2.3 miles south of the Project site. Pursuant to the County Guidelines for Determining Significance, Agricultural Resources, impacts related to interface conflicts would usually be less than significant if the land uses are separated by 300 feet. Therefore, no indirect impacts are expected to occur to any offsite resources, and mitigation would not be required. Additionally, the Project is for the development of a veterinary and dental clinic, which is compatible with the surrounding commercial use types. 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 Project would have a less-than-significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

2(c) The GPU EIR concluded this impact to be significant and unavoidable. The Project site including any offsite improvements do not contain any forest lands as defined in Public Resources Code section 12220(g). Project implementation would not result in the loss or conversion of forest land to a non-forest use. 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. The Project would have a less-than-significant impact to forest resources. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

2(d) The GPU EIR concluded this impact to be significant and unavoidable. As indicated in response 2(c), the Project site, or any off-site improvements, are not located 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. As mentioned above in responses 2(a) and 2(b), the site is undeveloped with no active agricultural use types. The Project site is zoned C28, General Commercial and RR, Rural Residential. As mentioned above in response 2(a), the Project site would not be considered a viable agricultural resource due to the lack of water resources on site. In addition, no active agricultural operations exist within the vicinity of the Project site.

As previously discussed, the GPU EIR determined impacts from direct and indirect conversion of agricultural resources (including forest resources) to be significant and unavoidable. The Project would have less than significant impacts to agricultural 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.

**Conclusion**

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

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

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

- a) Conflict with or obstruct implementation of the San Diego Regional Air Quality Strategy (RAQS) or applicable portions of the State Implementation Plan (SIP)?
- b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?
- c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?
- d) Expose sensitive receptors to substantial pollutant concentrations?
- e) Create objectionable odors affecting a substantial number of people?

**Discussion**

3(a) The GPU EIR concluded this impact to be less than significant. The General Plan designates the Project site as General Commercial and Village Residential. The Project is consistent with the General Plan land use designation and density. Because the Project is allowed under the General Plan land use designation, which is used in San Diego Association of Governments' (SANDAG's) growth projections, it is consistent with San Diego County Air Pollution Control District's (SDAPCD's) Regional Air Quality Strategy (RAQS) and portions of the State Implementation Plan (SIP). As such, the Project would not conflict with either the RAQS or the SIP. In addition, the construction and operational emissions from the Project would be below established screening-level thresholds (SLTs), as addressed under Question 3(b), and would not violate any ambient air quality standards.

As previously discussed, the GPU EIR determined impacts on air quality plans to be less than significant. As the 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.

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

(SCAQMD) for the Coachella Valley (which is more appropriate for the San Diego Air Basin). The County's SLTs and SDAPCD's trigger levels were developed in support of State and federal ambient air quality standards that are protective of human health.

The Applicant proposes the construction of a veterinary and dental clinic. According to the County of San Diego's Operational Phase Air Quality Study Trigger Criteria, a project would not be expected to result in operational emissions that exceed the SLTs if the project equivalent single-family units are below 300. Project equivalent single-family units are calculated based on Table 5, Operational Phase Air Quality Study Trigger Criteria found in the County's Air Quality Report Format and Content Guidelines. Based on Table 5, the Project would result in 16.92 equivalent single-family units. Therefore, the Project would not result in development that would exceed the trigger level for operational emissions and would not result in emissions that exceed the County's SLTs.

Construction of the Project is expected to begin early 2022 and be completed in mid-2022. The first year of full operations would be expected in 2023. Emissions generated during construction activities would be temporary and localized. Earthwork activities during construction of the Project would require the export of 6,000 cubic yards of soil. Construction activities would be subject to the County of San Diego Grading Ordinance and SDAPCD Rule 55 to reduce fugitive dust. To further reduce potential impacts generated during the construction phase, the Project would require all construction equipment used during grading and site preparation activities to employ EPA certified Tier 4 or better engines with diesel particulate filters (DPF). Therefore, the Project would not violate any air quality standard or contribute substantially to an existing or projected air quality violation.

As previously discussed, the GPU EIR determined significant and unavoidable impacts to air quality violations. The Project would not violate any air quality standard or contribute substantially to an existing or projected air quality violation and would not result in an impact that was not previously identified in the GPU EIR with the incorporation of mitigation consistent with GPU EIR measure Air-2.5.

### Project Mitigation

#### **Tier 4 Construction Equipment and Diesel Particulate Filters**

All diesel-powered equipment would be equipped with engines that meet or exceed either EPA or California Air Resources Board (CARB) Tier 4 off-road with DPF emissions standards for particulate matter exhaust. An exemption from the Tier 4 with DPF requirement may be granted by the County in the event that the Developer documents that equipment with the required tier is not reasonably available and corresponding reductions in criteria air pollutant emissions are achieved from another construction equipment. Before an exemption may be considered by the County, the Developer shall be required to demonstrate that three construction fleet owners/operators in the San Diego region were contacted and that those owners/operators confirmed Tier 4 Final equipment with DPF could not be located within the San Diego region.

- 3(c) The GPU EIR concluded this impact to be significant and unavoidable. San Diego County is presently in non-attainment for the National and California Ambient Air Quality Standard (NAAQS and CAAQS, respectively) for ozone (O<sub>3</sub>). San Diego County is also presently in non-attainment for concentrations of Particulate Matter less than or equal to 10 microns (PM<sub>10</sub>) and Particulate Matter less than or equal to 2.5 microns (PM<sub>2.5</sub>) under the CAAQS. O<sub>3</sub> is formed when VOCs and oxides of nitrogen (NO<sub>x</sub>) react in the presence of sunlight.

VOC sources include any source that burns fuels (e.g., gasoline, natural gas, wood, oil); solvents; petroleum processing and storage; and pesticides. Sources of PM<sub>10</sub> and PM<sub>2.5</sub> in both urban and rural areas include: motor vehicles, wood burning stoves and fireplaces, dust from construction, landfills, agriculture, wildfires, brush/waste burning, and industrial sources of windblown dust from open lands.

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

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

The Project is proposing development that is consistent with the County's General Plan, thus operational air emissions are considered to have been accounted for in the GPU EIR. The RAQS and SIP were prepared consistent with growth forecasts in the General Plan. Further, as described under Question 3(b), Project construction and operations would not result in emissions of criteria air pollutants greater than the County's SLTs. Thus, the Project would not result in a cumulatively considerable net increase in criteria air pollutants for which the region is currently in non-attainment.

As previously discussed, the GPU EIR determined significant and unavoidable impacts to non-attainment criteria air pollutants. The Project would have a less than significant impact to non-attainment criteria air pollutants for the reasons stated above. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts or result in new impacts not identified within the GPU EIR.

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

Diesel particulate matter (DPM) is the primary toxic air contaminant (TAC) of concern and is generated from fuel consumption in heavy construction equipment. Abidance to the County of San Diego Grading Ordinance, SDAPCD Rule 55, the application of Tier 4

engines with DPF, and to a confined construction schedule would reduce emissions. Therefore, exposure to construction emissions would be temporary and would not expose sensitive receptors to excessive concentrations of air pollutants.

The County's SLTs for human health hazards were developed in support of State and federal ambient air quality strategies that are protective of human health. As discussed in Question 3(b), according to the County of San Diego's Operational Phase Air Quality Study Trigger Criteria, the Project would not result in development that would exceed the trigger criteria for operational emissions and would not result in emissions that exceed the County's SLTs or health risk. Furthermore, as indicated in Question 3(b), NAAQS and CAAQS would not be exceeded due to project contributions for both operations and construction and would not expose sensitive receptors to an incremental health risk.

As previously discussed, the GPU EIR determined significant and unavoidable impacts to sensitive receptors. 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 the construction phases of paving and painting activities which would require bitumen and solvents from the placement of hot asphalt and architectural coating. Exhaust from construction equipment may also generate odors. However, due to the dispersive nature of odors, these short-term impacts would be fairly short-lived and would not cause objectionable odors affecting a substantial number of people. Furthermore, the Project would be subject to SDAPCD Rule 51, Nuisance Rule, which prohibits emissions of any material that causes nuisance to a considerable number of persons or endangers the comfort, health, or safety of any person. The Project would result in the future development of a veterinary and dental clinic which are not generally associated with the generation of objectionable odors. Thus, the Project would not create objectionable odors affecting a substantial number of people during construction activities or operations.

As previously discussed, the GPU EIR determined less than significant impacts from objectionable odors. As the Project would have a less than significant impact from objectionable odors 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 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. Feasible mitigation measures contained within the GPU EIR (Air-2.5) would be applied to the Project.

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

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

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

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

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

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

A Summary Biology Report prepared for the Project by Vincent Scheidt dated September 2021.

4(a) Biological resources on the Project site were evaluated in the Summary Biology Report prepared by Vince Scheidt, dated September 2021. The site contains non-native grassland, coast live oak woodland, and urban/developed habitat. No sensitive plant or wildlife species were observed on the Project site. The Project would impact 1.2 acres of non-native grassland and 0.2 acres of urban/developed habitat. The Project site is located within the County’s draft North County Multiple Species Conservation Program (MSCP) in land designated as Outside the Pre-Approved Mitigation Area (PAMA).

As considered by the GPU EIR, project impacts to sensitive habitat and/or species would be mitigated through ordinance compliance and through implementation of the following mitigation measures consistent with GPU EIR mitigation measures Bio 1.6 and Bio 1.7.:

- Dedication of an onsite open space easement, which would include 0.6 acres of non-native grassland needed for mitigation and 0.5 acres of coast live oak woodland as an avoidance measure,
- Dedication of a limited building zone easement
- Incorporation of open space fencing and signage
- Breeding season avoidance to prevent brushing, clearing, and/or grading between January 1 and August 31.

4(b) Based on the Summary Biology Report, a small spring or seep is located near the western end of the Project site and is potentially a jurisdictional water. However, no impacts would occur to this feature as the Project proposes complete avoidance and would include this feature within the proposed onsite open space easement. The following sensitive habitats were identified on the site: non-native grassland and coast live oak woodland. As detailed in response a) above, direct, and indirect impacts to sensitive natural communities identified in the Resource Protection Ordinance (RPO), Natural Community Conservation Plan (NCCP), Fish and Wildlife Code, and Endangered Species Act are mitigated.

As considered by the GPU EIR, Project impacts to sensitive habitats would be mitigated through ordinance compliance and through implementation of the following mitigation measures consistent with GPU EIR Mitigation Measures Bio 1.6 and Bio 1.7:

- Dedication of an onsite open space easement, which would include 0.6 acres of non-native grassland needed for mitigation and 0.5 acres of coast live oak woodland as an avoidance measure
- Dedication of a limited building zone easement
- Incorporation of open space fencing and signage
- Breeding season avoidance to prevent brushing, clearing, and/or grading between January 1 and August 31.

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. The Project site contains a potential jurisdictional water located near the western end of the property. The Project as designed would avoid this feature and would include this feature within the onsite open space easement. No impacts would occur. Therefore, the Project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

4(d) The GPU EIR concluded this impact to be significant and unavoidable. Based on a GIS analysis, the County's Comprehensive Matrix of Sensitive Species, and the Summary Biology Report, it was determined that the site is not part of a regional linkage/corridor nor is it in an area considered regionally important for wildlife dispersal. The western end of the Project site could potentially assist in local wildlife movement and this area would be preserved within an onsite open space easement.

As previously discussed, the GPU EIR determined impacts to wildlife movement corridors 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.



4(e) The Project is located within the draft North County MSCP and outside of the South County MSCP. Therefore, it does not require conformance with the Biological Mitigation Ordinance (BMO). The Project is consistent with the County’s Guidelines for Determining Significance for Biological Resources, the RPO, and the Migratory Bird Treaty Act (MBTA) with the implementation of mitigation. The Project would not conflict with the provisions of any adopted Habitat Conservation Plan, NCCP, other approved local, regional, or state habitat conservation plan or any other local policies or ordinances that protect biological 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.

**Conclusion**

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

1. No peculiar impacts to the Project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. Feasible mitigation measures contained within the GPU EIR (Bio-1.6, Bio-1.7) would be applied to the Project.

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

	<b>Significant Project Impact</b>	<b>Impact not identified by GPU EIR</b>	<b>Substantial New Information</b>
a) Cause a substantial adverse change in the significance of a historical resource as defined in 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to 15064.5?	<input 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**

The following technical studies were prepared for the Project:

Negative Cultural Resources Survey Report, prepared by Brian F. Smith and Associates, Inc, dated September 21, 2021

- 5(a) The GPU EIR concluded this impact to be less than significant with mitigation. Based on an analysis of records and a survey of the property by County approved archaeologist, Brian F. Smith, it has been determined that the Project would not result in impacts to historical resources because they do not occur within the Project site. The results of the survey are provided in the cultural resources report titled, *Negative Cultural Resources Survey Report*, prepared by Brian F. Smith and Associates, dated September 21, 2021.

As previously discussed, the GPU EIR determined impacts on historic resources to be less than significant with mitigation. The Project would result in less than significant impact to historic resources. 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, Brian F. Smith, it has been determined that the Project would not result in impacts to archaeological resources because they do not occur within the Project site. In addition, the Native American Heritage Commission (NAHC) was contacted for a Sacred Lands File check. The NAHC response indicated that no sacred sites, on record with the commission, were present on the project property. Jonathon Dixon of Native Grounds served as the Native American monitor during the survey.

Although no resources were identified during site surveys, the potential exists for subsurface deposits because of dense vegetative cover on portions of the property which limited ground visibility. Additionally, the Valley Center area is sensitive for resources and recorded archaeological sites are located within the vicinity of the Project.

As considered by the GPU EIR, potential impacts to cultural resources would be mitigated through ordinance compliance and through implementation of the following mitigation measures consistent with the GPU EIR Mitigation Measure Cul-2.5:

- Grading monitoring under the supervision of a County-approved archaeologist and a Luiseño Native American monitor
- Conformance with the County's Cultural Resource Guidelines if resources are encountered. In addition, the project would be conditioned with archaeological monitoring (Cul-2.5) that includes the following requirements:

### **Pre-Construction**

Contract with a County approved archaeologist to perform archaeological monitoring and a potential data recovery program during all earth-disturbing activities. The Project Archaeologist shall perform the monitoring duties before, during and after construction.

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

### **Construction**

Monitoring. Both the Project Archaeologist and Luiseño Native American monitor are to be onsite during earth disturbing activities. The frequency and location of monitoring of native soils would be determined by the Project Archaeologist in consultation with the Luiseño Native American monitor. Both the Project Archaeologist and Luiseño Native American monitor would evaluate fill soils to ensure that they are negative for cultural resources

***If cultural resources are identified:***

Both the Project Archaeologist and Luiseño Native American monitor have the authority to divert or temporarily halt ground disturbance operations in the area of the discovery.

The Project Archaeologist shall contact the County Archaeologist at the time of discovery.

The Project Archaeologist in consultation with the County Archaeologist and Luiseño Native American shall determine the significance of discovered resources.

Construction activities would 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 Luiseño 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 Luiseño 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.**

If Human remains are discovered, the Property Owner or their representative shall contact the County Coroner and the County Archaeologist.

Upon identification of human remains, no further disturbance shall occur in the area of the find until the County Coroner has made the necessary findings as to origin. If the human remains are to be taken offsite for evaluation, they shall be accompanied by the Luiseño Native American monitor.

If the remains are determined to be of Native American origin, the Most Likely Descendant (MLD), as identified by the Native American Heritage Commission (NAHC), shall be contacted by the Property Owner or their representative in order to determine proper treatment and disposition of the remains.

The immediate vicinity where the Native American human remains are located is not to be damaged or disturbed by further development activity until consultation with the MLD regarding their recommendations as required by Public Resources Code Section 5097.98 has been conducted.

Public Resources Code §5097.98, CEQA §15064.5 and Health & Safety Code §7050.5 shall be followed in the event that human remains are discovered.

**Rough Grading**

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

### **Final Grading**

Final Report. A final report shall be prepared by the Project Archaeologist substantiating that earth-disturbing activities are completed and whether cultural resources were encountered. A copy of the final report shall be submitted to PDS and to the South Coastal Information Center, and any culturally-affiliated tribe who requests a copy.

### **Cultural Material Conveyance**

The final report shall include evidence that all prehistoric materials have been curated at a San Diego curation facility or Tribal curation facility that meets federal standards per 36 CFR Part 79, or alternatively have been repatriated to a culturally affiliated tribe.

The final report shall include evidence that all historic materials have been curated at a San Diego curation facility that meets federal standards per 36 CFR Part 79.

As previously discussed, the GPU EIR determined impacts to archaeological resources as less than significant with mitigation. The Project determined impacts to archaeological resources as potentially significant. However, the Project would incorporate the GPU EIR mitigation measure Cul-2.5 to reduce the impact to 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(c) The GPU EIR concluded this impact to be less than significant. The Project 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 geological formations that potentially contain unique paleontological resources. Proposed grading would include 6,000 cubic yards of excavation which is more than 2,500 cubic yards of excavation which has the potential to impact fossil deposits.

Accordingly, grading monitoring by the project contractor would be a condition of project approval. If paleontological resources are identified, then a qualified Paleontologist would be engaged.

As considered by the GPU EIR, potential impacts to paleontological resources would be mitigated through ordinance compliance and through implementation of the following mitigation measures consistent with GPU EIR Mitigation Measures Cul 3.1:

- Grading monitoring
- Conformance with the County's Paleontological Resource Guidelines if resources are encountered.

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 determined impacts to human remains as 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.

**Conclusion**

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

1. No peculiar impacts to the Project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. Feasible mitigation measures contained within the GPU EIR (Cul-2.5 and Cul-3.1), would be applied to the Project.

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

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

**Discussion**

Energy use was not specifically analyzed within the GPU EIR as a separate issue area under CEQA. At the time, Energy Use was contained within Appendix F of the CEQA Guidelines and since then has been moved to the issue areas within Appendix G of the CEQA Guidelines. However, the issue of energy use in general was discussed within the GPU and the GPU EIR. For example, within the Conservation and Open Space Element of the GPU, Goal COS-15 promotes sustainable architecture and building techniques that reduce emissions of criteria pollutants and GHGs, while protecting public health and contributing to a more sustainable environment. Policies, COS-15.1, COS-15.2, and COS-15.3 would support this goal by

encouraging design and construction of new buildings and upgrades of existing buildings to maximize energy efficiency and reduce GHG. Goal COS-17 promotes sustainable solid waste management. Policies COS-17.1 and COS-17.5 would support this goal by reducing GHG emissions through waste reduction techniques and methane recapture. The analysis below specifically analyzes the energy use of the Project.

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

#### Grading and Construction

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

The energy needs for the Project construction would be temporary and is not anticipated to require additional capacity or increase peak or base period demands for electricity or other forms of energy. Construction equipment use and associated energy consumptions would be typical of that associated with the construction of commercial office building of this size. Thus, the Project’s energy consumption during the grading and construction phase would not be considered wasteful, inefficient, or unnecessary.

#### Operational

Operation of the Project would be typical of medical office use requiring natural gas for space and water heating, and landscape maintenance activities. The Project would meet the California Code of Regulations Title 24 Standards and Energy Efficiency Standards for energy efficiency that are in effect at the time of construction. The Project would also comply with the County’s Landscape Ordinance and the water use application using prescriptive compliance option to reduce overall water use onsite. Both clinics would install qualified ENERGY STAR™ appliances.

Over the lifetime of the Project, fuel efficiency of vehicles is expected to increase as older vehicles are replaced with newer, more efficient models. As such, the amount of petroleum consumed as a result of vehicle trips to and from the Project site during operation would decrease over time. State and Federal regulations regarding standards for vehicles (e.g.,

Advanced Clean Cars Program, CAFÉ Standards) are designed to reduce wasteful, unnecessary, and inefficient use of fuel. The coupling of various State policies and regulations such as the Zero-Emission Vehicles Mandate and Senate Bill 350 would result in the deployment of electric vehicles which would be powered by an increasingly renewable electrical grid.

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

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

- Compliance with County's Water Conservation in Landscaping Ordinance, demonstrating a 40 percent reduction in outdoor use which would reduce energy required for water conveyance.
- Installation of qualified ENERGY STAR™ appliances within both the clinics.

In addition, the Project would be consistent with energy reduction policies of the County General Plan including policies COS-14.1 and COS-14.3. The Project would be consistent with sustainable development and energy reduction policies such as policy COS-15.4, through compliance with the most recent Title 24 Energy Efficiency Standards at the time of Project construction. The Project would implement energy reduction design features and comply with the most recent energy building standards consistent with applicable plans and policies. Therefore, the Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

As previously discussed, the GPU EIR did not analyze Energy as a separate issue area under CEQA. Energy was analyzed under the GPU and GPU EIR and has been incorporated within General Plan Elements. The Project would not conflict with policies within the GPU related to energy use or conflict with or obstruct a state or local plan for renewable energy or energy efficiency as specified within Appendix G of the CEQA Guidelines.

## **Conclusion**

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

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

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

	<b>Significant Project Impact</b>	<b>Impact not identified by GPU EIR</b>	<b>Substantial New Information</b>
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving: (i) rupture of a known earthquake fault, (ii) strong seismic ground shaking or seismic-related ground failure, (iii) liquefaction, and/or (iv) landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in an on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**Discussion**

7(a)(i) The GPU EIR concluded this impact to be less than significant. The Project is not located in a fault rupture hazard zone identified by the Alquist-Priolo Earthquake Fault Zoning Act, Special Publication 42, Revised 1997, Fault-Rupture Hazard Zones in California, or located on any known active, potentially active, or inactive fault traces. The nearest Alquist-Priolo fault to the Project site is located approximately 23 miles to the east of the site.

7(a)(ii) The GPU EIR concluded this impact to be less than significant. To ensure the structural integrity of all buildings and structures, the Project must conform to the Seismic Requirements as outlined within the California Building Code. In addition, a geotechnical 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.

7(a)(iii) The GPU EIR concluded this impact to be less than significant. The Project site is located within a “Potential Liquefaction Area” as identified by the County Guidelines for Determining Significance for Geologic Hazards. This indicates that liquefaction potential at the site is high. To ensure no impacts would occur, a geotechnical report would be required prior to ground disturbance activities as a standard condition of approval. The GPU EIR identified the standard condition of a geotechnical report within section 2.6.3.1, Federal, State and Local Regulations and Existing Regulatory Processes, Liquefaction.

Conditions of Approval

The following list includes the Project conditions of approval:



### **Geotechnical Report**

- A California Certified Engineering Geologist shall complete a final soils report specific to the preliminary design of the proposed development and submit the final soils report to the County Department of Planning & Development Services. The findings shall be reviewed and approved by the Director of the County Department of Planning & Development Services or designee.

7(a)(iv) The GPU EIR concluded this impact to be less than significant. The Project site is located within a "Landslide Susceptibility Area" as identified in the County Guidelines for Determining Significance for Geologic Hazards and is considered to be Generally Susceptible. The Project site slopes towards the northeast on an average 10 percent slope.

As previously discussed, the GPU EIR determined less than significant impacts from exposure to seismic-related hazards and soil stability. The Project would have a less than significant impact with the incorporation of Project conditions for a geological soils report, as a standard condition of approval. The GPU EIR identified the standard condition of a geotechnical report within section 2.6.3.1, Federal, State and Local Regulations and Existing Regulatory Processes, Liquefaction. 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.

7(b) The GPU EIR concluded this impact to be less than significant. The soils on-site have been identified as Clayey alluvial land, Las Posas fine sandy loam, and Las Posas fine that have a soil erodibility rating of moderate. In addition, Fallbrook sandy loam soils are located on site and have a soil erodibility rating of severe. However, the Project would not result in substantial soil erosion or the loss of topsoil because the Project would be required to comply with the Watershed Protection Ordinance (WPO) and Grading Ordinance which would ensure that the Project would not result in any unprotected erodible soils, significantly alter existing drainage patterns, or develop steep slopes. Additionally, the Project would be required to implement Best Management Practices (BMPs) per the Priority Development Project (PDP) Storm Water Quality Management Plan (SWQMP) to prevent fugitive sediment.

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

7(c) The GPU EIR concluded this impact to be less than significant. As indicated in response (a)(iv), the site is located within a "Landslide Susceptibility Area" as identified in the County Guidelines for Determining Significance for Geologic Hazards and is considered to be Generally Susceptible. The Project site slopes towards the northeast on an average 10 percent slope. In order to assure that any proposed buildings are adequately supported, a Soils Engineering Report is required as part of the grading and 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 Project would have a less-than-significant impact for the reasons listed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 7(d) The GPU EIR determined impacts from expansive soils to be less than significant. The Project site is not underlain by expansive soils, however, as a standard project condition, the Project would be required to submit a Soils Engineering Report by a California Certified Engineering Geologist prior to grading. The soils report is required to include a surficial stability analysis with design recommendations. All geotechnical recommendations provided in the soils report would be followed during grading and construction of the Project.

As previously discussed, the GPU EIR determined impacts from expansive soils to be less than significant. As the Project would have a less-than-significant impact with the incorporation of standard project conditions, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 7(e) The GPU EIR concluded this impact to be less than significant. The Project would not place septic tanks or alternative wastewater disposal systems on soils incapable of adequately supporting the tanks or system.

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

**Conclusion**

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

1. No peculiar impacts to the Project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. No mitigation measures contained within the GPU EIR would be required because Project specific impacts would be less than significant by adhering to the Project conditions of approval, which are consistent with the GPU EIR.

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

<b>Significant Project Impact</b>	<b>Impact not identified by GPU EIR</b>	<b>Substantial New Information</b>
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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"/>
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b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

**Analysis**

8(a) The GPU EIR concluded this impact to be less than significant with mitigation. Amendments to Section 15064.4 of the CEQA Guidelines were adopted to assist lead agencies in determining the significance of the impacts of GHG emissions. Section 15064.4 specifies that a lead agency “shall make a good-faith effort, based to the extent possible on scientific and factual data, to describe, calculate or estimate the amount of greenhouse gas emissions resulting from a project.” Section 15064.4 also provides lead agencies with the discretion to determine whether to assess those emissions quantitatively or to rely on a qualitative analysis or performance-based standards.

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

GHGs include carbon dioxide, methane, halocarbons (HFCs), and nitrous oxide, among others. Human induced GHG emissions are a result of energy production and consumption, and personal vehicle use, among other sources.

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

Utilizing the California Emissions Estimator Model (CalEEMod) model, which is the model commonly used to evaluate GHG impacts in CEQA, the project is estimated to generate 333 metric tons of Carbon Dioxide equivalent (CO<sub>2</sub>e) per year during operations. Construction emissions are estimated to result in 2 metric tons CO<sub>2</sub>e per year when amortized over a 30-year timeframe. With construction, annual project GHG emissions were estimated to be 335 metric ton CO<sub>2</sub>e.

With the implementation of the following sustainability measures emissions would be reduced by 49 metric tons CO<sub>2</sub>e resulting in a total of 286 metric tons CO<sub>2</sub>e:

- Installation of photovoltaic (PV) solar panels
- Reduction of outdoor water consumption by 40 percent from the Maximum Applied Water Allowance
- Installation of low-flow water fixtures
- Installation of energy efficient appliances
- Installation of electric water heaters
- Installation of electric vehicle (EV) chargers
- Diversion of 90 percent of inert and 70 percent of all other construction and demolition waste from a landfill

Project sustainability features are consistent with County General Plan mitigation measures CC-1.1, CC-1.11, CC-1.17 which encourage incentives for energy efficient development, implementation of the Ordinance Relating to Water Conservation for Landscaping, and implementation of a construction waste recycling program. In addition, the Project is consistent with the land uses evaluated in the General Plan, which analyzed the impacts of commercial uses on the Project site.

In response to Assembly Bill (AB) 32, the California Air Pollution Control Officers Association (CAPCOA) white paper titled "CEQA & Climate Change: Evaluating and Addressing Greenhouse Gas Emissions from Projects Subject to the California Environmental Quality Act," provides a methodology used for jurisdictions across the state to identify a screening level for GHG emissions (CAPCOA 2008). The CAPCOA guidance states that projects should be screened to determine if their associated GHG emissions exceed 900 MTCO<sub>2e</sub>. Since adoption of this threshold, Senate Bill (SB) 32 was passed to set a revised statewide reduction target to reduce emissions to 40 percent below 1990 levels by year 2030.

As compared to similar mass emissions thresholds adopted by other regional air districts the CAPCOA 900 MTCO<sub>2e</sub> threshold is relatively conservative and could be used to support cumulative impact determination beyond 2020. In April 2020, the Sacramento Metropolitan Air Quality Management District (SMAQMD) published updated project screening levels and determined that projects estimated to generate less than 1,100 metric tons CO<sub>2e</sub> per year would not result in a significant, cumulative impact. This threshold was developed to demonstrate compliance with the statewide reduction targets.

Thus, the CAPCOA threshold of 900 metric tons CO<sub>2e</sub> represents a more stringent screening level than has been approved by other air districts in compliance with 2030 statewide reduction targets. Also, as State legislative requirements such as Building Energy Efficiency Standards and transportation-related efficiency measures become increasingly more stringent over time, future project GHG emissions would be reduced helping to meet State emission reduction targets. As described previously, the Project would generate a total of 286 metric tons CO<sub>2e</sub> per year, which is well below both screening thresholds. However, the Project does not rely on the screening level thresholds to determine impact significance, rather to illustrate that the Project would not cause a significant direct or cumulative impact from GHG emissions due to the relatively small amount of GHG emissions during operation and construction.

As previously discussed, the GPU EIR determined impacts to be less than significant with mitigation. The Project is consistent with the GPU EIR and would not generate a significant amount of GHG emissions. 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.

- 8(b) The GPU EIR concluded this impact to be less than significant. As described above, the Project would not result in a cumulatively considerable contribution to global climate change. As such, the Project would be consistent with County goals and policies included in the County General Plan that address GHG reductions.

The Project is consistent with the County's General Plan land use designation of General Commercial and Village Residential. Through its goals, policies, and land use

designations, the County’s General Plan aims to reduce countywide GHG emissions. Furthermore, the County’s General Plan growth projections informed the development of the SANDAG’s San Diego Forward: the 2015 Regional Plan which is the region’s 2050 Regional Transportation Plan and Sustainable Community Strategy (RTP/SCS). SANDAG’s Regional Plan is the region’s applicable plan for reducing GHG emissions and is consistent with State GHG emissions reductions goals set by the California Air Resources Board (CARB) under SB 375. Because the proposed Project is consistent with the General Plan land uses, it is also consistent with State GHG emission reduction targets as identified in the SANDAG RTP/SCS. In addition, because the Project’s proposed land uses are consistent with the County’s General Plan land use designation, the Project would not result in growth beyond what was assumed in the regional growth forecasts. Therefore, the Project’s impacts related to GHG emissions would be less than significant.

As previously discussed, the GPU EIR determined impacts to applicable regulation compliance 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.

**Conclusion**

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

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

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

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

Government Code Section 65962.5, or is otherwise known to have been subject to a release of hazardous substances and, as a result, would it create a significant hazard to the public or the environment?

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

e) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

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

g) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

h) Propose a use, or place residents adjacent to an existing or reasonably foreseeable use that would substantially increase current or future resident's exposure to vectors, including mosquitoes, rats or flies, which are capable of transmitting significant public health diseases or nuisances?

**Discussion**

9(a) The GPU EIR concluded this impact to be less than significant. The Project includes a 7,572 square foot veterinary clinic and a 3,140 square foot dental clinic. The Project may result in the storage, use, transport, and disposal of hazardous materials for medical-related uses. The Project would be required to comply with applicable federal, State and local regulations related to hazardous materials including the implementation of a Hazardous Materials Business Plan (Plan). The Plan is required to contain basic information on the location, type, quantity and health risks of hazardous materials stored, used, or disposed of at the Project location. The Plan would also contain an emergency response plan which describes the procedures for mitigating a hazardous release, procedures and equipment for minimizing the potential damage of a hazardous materials release, and provisions for immediate notification of the County DEH, the Office of Emergency Services, and other emergency response personnel such as the local Fire Agency having jurisdiction. Implementation of the emergency response plan facilitates rapid response in the event of an accidental spill or release, thereby reducing potential adverse impacts and impacts would be 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 Project would have a less-than-significant impact for the reasons

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

9(b) The GPU EIR concluded this impact to be less than significant. The Project is not within one-quarter mile of an existing school. The closest school is Valley Center Elementary located approximately 3 miles from the Project site. As previously discussed, the GPU EIR determined impacts from hazards to schools 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.

9(c) The GPU EIR concluded this impact to be less than significant. Based on a site visit and a comprehensive review of regulatory databases, the Project site has not been subject to a release of hazardous substances. Additionally, the Project does not propose structures for human occupancy or significant linear excavation within 1,000 feet of an open, abandoned, or closed landfill, is not located on or within 250 feet of the boundary of a parcel identified as containing burn ash (from the historic burning of trash) and is not on or within 1,000 feet of a Formerly Used Defense Site.

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

9(d) The GPU EIR concluded this impact to be less than significant with mitigation. The Project is not located within an Airport Land Use Compatibility Plan (ALUCP), an Airport Influence Area, or a Federal Aviation Administration Height Notification Surface. Additionally, 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. Therefore, the Project would not constitute a safety hazard for people residing or working in the project area.

As previously discussed, the GPU EIR determined impacts on public airports 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.

9(e) The GPU EIR concluded this impact to be less than significant with mitigation. The Project is not within one mile of a private airstrip. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

9(f)(i) OPERATIONAL AREA EMERGENCY PLAN AND MULTI-JURISDICTIONAL HAZARD MITIGATION PLAN:  
The GPU EIR concluded this impact to be less than significant with mitigation. The Project would not interfere with this plan because it would not prohibit subsequent plans from being established or prevent the goals and objectives of existing plans from being carried out.

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

9(f)(iii) OIL SPILL CONTINGENCY ELEMENT:

The Project is not located along the coastal zone.

9(f)(iv) EMERGENCY WATER CONTINGENCIES ANNEX AND ENERGY SHORTAGE RESPONSE PLAN:

The Project would not alter major water or energy supply infrastructure which could interfere with this plan.

9f)(v) DAM EVACUATION PLAN:

The Project is not located within a dam inundation zone. Additionally, the development would not constitute a "Unique Institution" such as a hospital, school, or retirement home pursuant to the Office of Emergency Services included within the County Guidelines for Determining Significance, Emergency Response Plans. Therefore, the Project would not impair implementation of or physically interfere with an adopted dam evacuation plan.

As previously discussed, the GPU EIR determined impacts from emergency response and evacuation plans to be less than significant with mitigation. 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.

9(g) The GPU EIR concluded this impact as significant and unavoidable. The Project is within the Very High Fire Hazard Severity Zone (VHFHSZ) and within the Urban-Wildlife Interface Zone. However, the Project would not expose people or structures to a significant risk of loss, injury or death involving wildland fires because the Project would 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. Specifically, all exterior walls would be 1-hour rated firewalls. On the south side of both building, no openings such as doors or windows would be constructed. Both buildings would be fully sprinklered. Well-developed fuel treatments would be required throughout the entire site. A 24-foot wide, paved fire access road would be constructed off of Valley Center Road. The access road would have a fire apparatus turn around built to reduce fire apparatus backing incidents. In addition, the Project would install a new fire hydrant along the proposed access road.

Implementation of these fire safety standards would occur during the building permit process and is consistent with GPU mitigation measure Haz-4.3. In addition, the Project is consistent with the Zoning Ordinance and the density established under the County of San Diego General Plan. Therefore, for the reasons stated above, the Project would not expose people or structures to a significant risk of loss, injury or death involving wildland fires. Moreover, the Project would 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. As the 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.

9(h) The GPU EIR concluded this impact as less than significant. The Project does not involve or support uses that allow water to stand for a period of 72 hours (3 days) or more (e.g.,



artificial lakes, agricultural irrigation ponds). Also, the Project does not involve or support uses that would produce or collect animal waste, such as equestrian facilities, agricultural operations (chicken coops, dairies etc.), solid waste facility or other similar uses. Therefore, the Project would not substantially increase exposure to vectors, including mosquitoes, rats or flies.

As previously discussed, the GPU EIR determined less than significant impacts with mitigation from vectors. As the Project would also 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.

**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. Feasible mitigation measures contained within the GPU EIR (Haz-4.3), would be applied to the Project.

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

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

- |   |                          |                          |                          |
|---|--------------------------|--------------------------|--------------------------|
| e) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| f) Substantially alter the existing drainage pattern of the 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| g) Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems?   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| h) Provide substantial additional sources of polluted runoff?   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 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?  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| j) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| k) Expose people or structures to a significant risk of loss, injury or death involving flooding?   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 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?  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| m) Inundation by seiche, tsunami, or mudflow?   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

**Discussion**

The following Technical Studies were prepared for the Project related to hydrology and water quality:

Preliminary Drainage Study for Clarke Vet and Dental Clinics prepared by Wynn Engineering & Consulting dated September 15, 2021.

Stormwater Quality Management Plan (SWQMP) For Priority Development Projects (PDPs) prepared by Wynn Engineering dated September 15, 2021.

10(a) The GPU EIR concluded this impact to be significant and unavoidable. Development projects have the potential to generate pollutants during both the construction and operational phases. 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 PDP SWQMP, the Project would implement site design, source control and structural BMPs to prevent potential pollutants from entering storm water runoff. The PDP SWQMP has been prepared in accordance with the County of San Diego BMP Design Manual (2019) and SDRWQCB Order No. R9-2013-0001 Municipal Separate Storm Sewer System (MS4) permit (2013), as adopted by the RWQCB on May 8, 2013.

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

As previously discussed, the GPU EIR determined significant and unavoidable impacts to water quality standards and requirements. As the Project would have a less-than-significant impact to water quality standards through ordinance compliance as 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.

- 10(b) The GPU EIR concluded this impact to be significant and unavoidable. The site is located within Valley Center Hydrologic Sub-Area (HSA 903.14), which is part of the Lower San Luis Hydrologic Area (HA 903.10) and San Luis Rey Hydrologic Unit (HU 903.00). Under Section 303(d) of the Clean Water Act, the Lower San Luis Rey Watershed was identified as impaired for a number of pollutants, including, but not limited to: selenium, Enterococcus bacteria, total coliform bacteria, chloride, phosphorus and total dissolved Solids. The Project could contribute to release of these pollutants; however, the Project would comply with the WPO and implement site design measures, source control BMPs, and structural 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, the Project would have a less-than-significant impact to water quality standards with the implementation of project conditions listed in 10(a). The conditions are consistent with the GPU EIR mitigation measures Hyd-1.2 through Hyd-1.5. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 10(c) The GPU EIR concluded this impact to be significant and unavoidable. As stated in responses 10(a) and 10(b) above, implementation of BMPs and compliance with required ordinances would 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 Project would have a less-than significant impact to water quality standards and requirements and groundwater supplies and recharge with the implementation of project conditions listed in 10(a). The conditions are consistent with the GPU EIR mitigation measures Hyd-1.2 through Hyd-1.5. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 10(d) The GPU EIR concluded this impact to be significant and unavoidable. The Project is within the service area of the Valley Center Municipal Water District that obtains water from the San Diego County Water Authority who imports water through the Metropolitan Water District of Southern California (MWD). MWD obtains its water from two sources, the Colorado River and the State Water Project. The Project would not use groundwater for its potable water supply. 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. As the Project would have a less-than-significant impact to groundwater recharge, the Project would not be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 10(e) The GPU EIR concluded this impact to be less than significant with mitigation. The Project would not result in substantial erosion or siltation on or off-site because storm water quality management plans are prepared for both the construction and post-construction phases of the development Project. During the construction phase, the Project would be required to prepare 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.

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 PDP SWQMP dated September 15, 2021, 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.

Under the existing conditions, a portion of the hillside south of the Project sheet flows onto the site and confluences with site flows in a northeasterly direction. The majority of the flows are captured by a concrete brow ditch on the adjacent property along the northerly

property line. Those flows converge with surrounding flows associated with Valley Center Road. Runoff then comingles with flows from Valley Center Road via a public storm drain constructed as part of Valley Center Road Improvements. Runoff continues its course north eventually discharging into Moosa Canyon Creek. Flows continue west on Moosa Canyon Creek eventually joining with San Luis Rey River which ultimately outlets to the Pacific Ocean.

In the post construction condition, drainage areas and patterns would not be altered or diverted. Offsite flows would be bypassed and would not comingle with project runoff. Storm water runoff from the Project site would flow into two proposed biofiltration basins.

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

- 10(f) The GPU EIR concluded this impact to be less than significant with mitigation. The Preliminary Hydrology Study prepared by Wynn Engineering dated September 15, 2021 determined that the Project would not alter the existing drainage pattern in a manner which would result in flooding on- or off-site.

Under existing conditions, a portion of the hillside south of the Project sheet flows onto the site and confluences with site flows in a northeasterly direction. The majority of the flows are captured by a concrete brow ditch on the adjacent property along the northerly property line. Those flows converge with surrounding flows associated with Valley Center Road. Runoff comingles with flows from Valley Center Road via a public storm drain constructed as part of Valley Center Road Improvements (RS 01838-3,4,5,6). Runoff continues its course north eventually discharging into Moosa Canyon Creek. Flows continue west on Moosa Canyon Creek eventually joining with San Luis Rey River which ultimately outlets to the Pacific Ocean.

Post construction, drainage areas and patterns would not be altered or diverted. However, the increase of impervious surfaces would generate additional runoff. Offsite flows would be bypassed and not comingle with Project runoff. Storm water runoff from the Project site would flow into two proposed biofiltration basins. The largest basin would be sized as a conjunctive use facility to meet pollutant, hydromodification and flood control requirements. Through the use of Low Impact Development (LID) practices and conjunctive use facility, flows leaving the site would be detained to be equal or less than pre-project condition reducing additional runoff.

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

- 10(g) The GPU EIR concluded this impact to be less than significant with mitigation. Pursuant to the Preliminary Drainage Study prepared for the proposed Project by Wynn Engineering dated September 15, 2021 and as described above in 10(e) and 10(f), the Project would

maintain the existing pre-development on-site drainage pattern. Post development drainage would be at or below pre-development rates of discharge.

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

- 10(h) The GPU EIR concluded this impact to be significant and unavoidable. The Project has the potential to generate pollutants; however, site design measures, source control BMPs, and treatment control BMPs as indicated in response 10(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 Project would have a less-than-significant impact to water quality standards with the implementation of project conditions listed in 10(a). The conditions are consistent with the GPU EIR mitigation measures Hyd-1.2 through Hyd-1.5. Therefore, the Project would not be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

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

As previously discussed, the GPU EIR determined impacts from housing within a 100-year flood hazard area as less than significant with mitigation. 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.

- 10(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. The Project does not proposed housing and would therefore not place housing within a County or federal floodplain or flood way.

As previously discussed, the GPU EIR determined impacts from housing within a 100-year flood hazard area as less than significant with mitigation. 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.

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

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

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

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

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

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

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

As previously discussed, the GPU EIR determined impacts from seiche, tsunami and mudflow hazards to be less than significant with mitigation. 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 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 compliance with the Guidelines for Determining Significance for Hydrology and Water Quality as well as for Dam Inundation, the Watershed Protection Ordinance, Stormwater Standards Manual, and the Resource Protection Ordinance.

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

- a) Physically divide an established community?
- 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**

11(a) The GPU EIR concluded this impact to be less than significant with mitigation. The Project does not propose the introduction of new infrastructure such as major roadways, water supply systems, or utilities to the area. The Project includes a veterinary and dental clinic and is consistent with the County of San Diego General Plan.

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

11(b) The GPU EIR concluded this impact to be less than significant. The Project includes a veterinary and dental clinic, which is consistent with the General Plan and the certified GPU EIR. The discretionary actions for the Project include a site plan and certificate of compliance.

The Project site is zoned Commercial and Rural Residential and has a General Plan land use designation of General Commercial and Village Residential. As stated in response 11(a), the Project would be consistent with the General Plan allowed density and has been anticipated in the GPU EIR.

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

**Conclusion**

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

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



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

- |   |                          |                          |                          |
|---|--------------------------|--------------------------|--------------------------|
| a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?                                | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

12(a) The GPU EIR determined that impacts to mineral resources would be significant and unavoidable. The California Surface Mining and Reclamation Act (SMARA) required classification of land into Mineral Resource Zones (MRZs). The Project site has been classified by the California Department of Conservation – Division of Mines and Geology (Update of Mineral Land Classification: Aggregate Materials in the Western San Diego Production-Consumption Region, 1997) as an area of “Potential Mineral Resource Significance” (MRZ-3). However, the Project site is surrounded by densely developed land uses including high density residential 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 would 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 Project would have a less-than-significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

12(b) The GPU EIR concluded this impact to be significant and unavoidable. The Project site is located in MRZ-3 zone. However, there are no active mines located in the Project area. 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 would occur as a result of this Project. The Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

**Conclusion**

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

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

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

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

- |   |                          |                          |                          |
|---|--------------------------|--------------------------|--------------------------|
| 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"/> |

- 13(a) The GPU EIR concluded this impact to be less than significant with mitigation. The area surrounding the Project site consists of commercial properties. 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). The Project is not expected to expose existing or planned noise sensitive areas to noise in excess of 60 dB(A).

Noise Ordinance – Section 36-404: Non-transportation noise generated by the Project is not expected to exceed the standards of the Noise Ordinance at or beyond the Project’s property line. The site is zoned Commercial (C36) which is subject to a one-hour average sound limit of 60 dBA in the daytime and 55 dBA during nighttime. The adjacent properties are also zoned Commercial. The Project does not involve any noise producing equipment that would exceed the applicable noise levels at the adjoining property line.

Noise Ordinance – Section 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. Also, it is not anticipated that the Project would operate construction equipment in excess of an average sound level of 75dB between the hours of 7 AM and 7 PM.

As previously discussed, the GPU EIR determined impacts from excessive noise levels to be less than significant with mitigation. As the Project would have a less-than-significant impact, the Project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 13(b) The GPU EIR concluded this impact to be less than significant with mitigation. The Project proposes commercial uses which are not considered sensitive to low ambient vibration. In addition, the Project does not propose any blasting or rock crushing during the grading operations.

As previously discussed, the GPU EIR determined impacts from excessive groundborne vibration to be less than significant with mitigation. 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.

- 13(c) As indicated in the response listed under Section 13(a), the Project would not expose existing or planned noise sensitive areas in the vicinity of the Project site to a substantial permanent increase in noise levels that exceed the allowable limits of any applicable noise standards. Also, the Project would not expose existing or planned noise sensitive areas to noise levels of 10 dB CNEL over existing ambient noise levels as required by the County Noise Ordinance.

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

- 13(d) The GPU EIR concluded this impact to be less than significant with mitigation. The Project does not involve any operational uses that may create substantial temporary or periodic increases in ambient noise levels in the Project vicinity. Construction noise would be subject to the County 75 dBA eight-hour average requirement between 7 am and 7 pm at the boundary of any occupied property.

As previously discussed, the GPU EIR determined impacts from temporary increase in ambient noise levels to be less than significant with mitigation. As the Project would have a less than significant impact, the Project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 13(e) The GPU EIR concluded this impact to be less than significant with mitigation. The Project is not located within an ALUCP for airports or within 2 miles of a public airport or public use airport. The nearest airport is the McClellan Palomar Airport, which is approximately 25 miles away from the Project site. Therefore, the Project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 13(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 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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**14. Population and Housing – Would the Project:**

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

14(a) The GPU EIR concluded this impact to be less than significant. The Project site is designated in the General Plan as General Commercial and Village Residential. The Project includes a veterinary and dental clinic and is consistent with the density and use types allowable under the General Plan, and thus would not induce substantial unplanned population growth in the area as development of the site was accounted for within the General Plan. In addition, the Project does not propose any physical or regulatory change that would remove a restriction to or encourage population growth in the area.

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

14(b) The GPU EIR concluded this impact to be less than significant. The Project includes a veterinary and dental clinic on a vacant property and would not displace existing housing requiring the construction of replacement housing.

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

- 14(c) The GPU EIR concluded this impact to be less than significant. The Project includes a veterinary and dental clinic on an existing vacant lot that would not result in the displacement of people, nor would replacement housing be required elsewhere.

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

**Conclusion**

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

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

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

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

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

15(a) The GPU EIR concluded this impact to be less than significant with mitigation with the exception of school services, which remained significant and unavoidable. The Project would not result in the need for significantly altered services or facilities. Valley Center Fire Protection District (VCFPD) provides fire and emergency medical services to the Project site. The nearest fire station is Fire Station 1 located at 28234 Lilac Road, Valley Center, CA. Fire Station 1 is the headquarters station which includes administration and fire prevention. One engine company is covered at the fire station with three firefighters staffing the engine. Normal response time for Engine 181 to the project site is less than three minutes based on computer modeling with a travel distance of 1.2 miles. This would meet the response time required for the Project by the County of San Diego General Plan Safety Element of 5 minutes.

The project would not result in the need for significantly altered sheriff protection services or facilities. The Project does not involve the construction of new or physically altered sheriff facilities in order to maintain acceptable service ratios, response times or other performance service ratios or objectives.

The Project would not include any residential or business uses that would increase population growth, generate an increased demand for school facilities, or require the construction of school facilities. The future tenants for the veterinary and dental clinics would be relocating their businesses from another part of Valley Center.

Based on 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. As the Project would have a less-than-significant impact for the reasons stated above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

**Conclusion**

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

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

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

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

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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b) Does the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?

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

16(a) The GPU EIR concluded this impact to be less than significant with mitigation. The Project includes a veterinary and dental clinic and would not result in increased use of existing

parks and other recreational facilities. The future tenants for the veterinary and dental clinics would be relocating their businesses from another part of Valley Center.

As previously discussed, the GPU EIR determined impacts related to deterioration of parks and recreational facilities to be less than significant. As the 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.

- 16(b) The GPU EIR concluded this impact to be less than significant with mitigation. The project does not include recreational facilities or require the construction or expansion of recreational facilities. Therefore, the Project would have a less than significant impact from the construction or expansion of recreational facilities.

As previously discussed, the GPU EIR determined impacts related to construction of new recreational facilities to be less than significant. As the 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.

**Conclusion**

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

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

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

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

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

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?
- d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?
- e) Result in inadequate emergency access?
- f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

**Discussion**

The following Technical Studies were prepared for the Project related to transportation and traffic:

Clarke Dental and Vet Clinics Project Vehicle Miles Traveled and Local Mobility Analysis. Mizuta Traffic Consulting, October 2020.

17(a) The GPU EIR concluded this impact to be significant and unavoidable. The County of San Diego previously adopted “Guidelines for Determining Significance and Report Format and Content Requirements for Transportation and Traffic” in 2006, with revisions and modifications approved in 2007, 2009, 2010 and 2011. Revisions and modifications focused primarily on metrics related to vehicle delay through Level of Service (LOS). These Guidelines presented an evaluation of quantitative and qualitative analyses and objective and predictable evaluation criteria and performance measures for determining whether a land development project or a public project like a community plan has a significant traffic impact on the environment pursuant to the CEQA, as well as a determination of the required level of CEQA analysis.

Senate Bill 743 (SB 743) was signed into law on September 27, 2013 and changed the way that public agencies evaluate transportation impact under CEQA. A key element of this law is the elimination of using auto delay, LOS, and other similar measures of vehicular capacity or traffic congestion as a basis for determining significant transportation impacts under CEQA. The legislative intent of SB 743 was to “more appropriately balance the needs of congestion management with statewide goals related to infill development, promotion of public health through active transportation, and reduction of greenhouse gas (GHG) emissions.” According to the law, “traffic congestion shall not be considered a significant impact on the environment” within CEQA transportation analysis.

In response, the Governor’s Office of Planning and Research (OPR) updated CEQA Guidelines to establish new criteria for determining the significance of transportation impacts. Based on input from the public, public agencies, and various organizations, OPR recommended that Vehicle Miles Traveled (VMT) be the primary metric for evaluating transportation impacts under CEQA. VMT measures the number of vehicle trips generated and the length or distance of those trips.



SB 743 does not prevent a city or county from continuing to analyze delay or LOS as part of other plans (i.e., General Plan), studies, congestion management and transportation improvements, but these metrics may no longer constitute the basis for transportation impacts under CEQA analysis as of July 1, 2020. For example, in the County, the General Plan identifies LOS as being a required analysis, and even though it would no longer be a requirement of CEQA, unless the General Plan is amended, LOS would continue to be analyzed as part of project review.

Per OPR guidance and Pub. Resources Code, § 21083, subd. (b)(2); see CEQA Guidelines, § 15064, subd. (h)(1.), “a project that falls below an efficiency-based threshold that is aligned with long-term goals and relevant plans has no cumulative impact distinct from the project impact”. Therefore, according to the traffic experts at OPR, the VMT efficiency threshold used herein is the threshold for both a direct transportation impact and cumulative transportation impact. OPR recommends at least 15 percent below the regional average to determine if there would be a VMT impact.

The requirements to prepare a detailed VMT analysis apply to all land development projects, except those that meet at least one of the screening criteria. OPR has developed certain project screening criteria to determine if a VMT analysis is required. The Locally Serving Retail/Service Projects screening criteria is intended for projects that are less than 50,000 square feet and generally improve the convenience of shopping close and has the effect of reducing vehicle travel. By definition, a retail or service establishment sells goods or services to the general public and serves the everyday needs of the community in which it is located.

The Project has a combined building area of 10,712 square feet, which is significantly less than the 50,000 square feet criteria. Additionally, the service provided by the Project is dental and veterinary needs for local Valley Center patients. The future tenants for the two proposed structures would be relocating their businesses from another part of Valley Center with 95 percent of their employees/patients residing in Valley Center. With the completion of the Project, both businesses would relocate into the respective buildings to operate their business. It is expected that the existing patients would continue to visit the dental and/or veterinary clinic once the businesses move into their permanent location. The presence of other dental and veterinary establishments in the community also support the conclusion that the Project would indeed function as local-serving service with most patients likely traveling from nearby areas of Valley Center, with little potential to draw longer trips from the wider region. The total regional VMT would not increase with the Project. Therefore, the Project would be screened out from a VMT analysis and would not result in a significant direct or cumulative VMT impact, and mitigation measures are not required. Therefore, the Project would not conflict with an applicable plan, ordinance or policy establishing measures of the effectiveness for the performance of the circulation system and impacts would be less than significant.

As previously discussed, the GPU EIR determined significant and unavoidable impacts to unincorporated County traffic and LOS standards. As the Project would have a less-than-significant impact for reasons stated above, the Project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 17(b) The GPU EIR concluded this impact to be significant and unavoidable. The designated congestion management agency for the County is the SANDAG. In October 2009, the San Diego region elected to be exempt from the State Congestion Management Plan 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.

Section 15064.3 of the CEQA Guidelines details new regulations, effective July 1, 2020 that sets forth specific considerations for evaluating a project's transportation impacts. Generally, VMT is the most appropriate measure of transportation impacts. VMT refers to the amount and distance of automobile travel attributable to a project. Other relevant considerations may include the effects of the project on transit and non-motorized travel. Except as provided regarding roadway capacity, a project's effect on automobile delay shall not constitute a significant environmental impact. As discussed in 17(a), the Project would be screened out from a VMT analysis and would not result in a significant direct or cumulative VMT impact, and mitigation measures are not required.

As previously discussed, the GPU EIR concluded this impact to be significant and unavoidable. As the Project would not conflict with an applicable congestion management program, the Project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

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

17(d) The GPU EIR concluded this impact to be significant and unavoidable. The 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 main access road from Valley Center Road would be improved and widened to 24 feet and would be designed to the latest County design standards with improved sight lines.

As previously discussed, the GPU EIR determined impacts on rural road safety to be significant and unavoidable. The Project would have a less-than-significant impact as improvements would not result in changes to roadway design that would cause increased hazards. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

17(e) The GPU EIR concluded this impact to be less than significant with mitigation. The Project would not result in inadequate emergency access. The Project includes the construction of a turn-around for fire apparatus in the parking lot using the main access road and the western turnoff to the second (western) parking lot. The turn-around/access roads would be constructed to meet County Fire Code Standard 503.2.6. Driveways would be constructed to a minimum of 24-feet in width. In addition, consistent with GPU EIR mitigation measure Tra-4.2, the Project would implement the Building and Fire codes to ensure emergency vehicle accessibility.

As previously discussed, the GPU EIR determined impacts on emergency access as less than significant with mitigation. The Project would have a less-than-significant impact with the implementation of Project conditions of approval for adherence to the Building and Fire codes, consistent with GPU EIR Mitigation Measure Tra-4.2. 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 with mitigation. The Project would not result in the construction of any road improvements or new road design features that would interfere with the provision of public transit, bicycle or pedestrian facilities. In addition, the Project does not generate sufficient travel demand to increase demand for transit, pedestrian or bicycle facilities.

As previously discussed, the GPU EIR determined impacts on alternative transportation and rural safety as less than significant with mitigation. As the 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 would be applied to the Project (Tra-4.2). The mitigation measures, as detailed above, would require the Project applicant to comply with the County Public Road Standards, Guidelines for Determining Significance, coordinate with other jurisdictions to identify appropriate mitigation and implement the Building and Fire Codes to ensure adequate services are in place.

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

- |  |                          |                          |                          |
|--|--------------------------|--------------------------|--------------------------|
| a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?          | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

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

18(a) The GPU EIR concluded this impact to be less than significant with mitigation. The Project does not propose to discharge domestic waste to on-site wastewater systems (OSWS), also known as septic systems.

As previously discussed, the GPU EIR determined impacts on wastewater treatment requirements as less than significant with mitigation. 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.

18(b) The GPU EIR concluded this impact to be less than significant with mitigation. The Project requires water service from the Valley Center Municipal Water District. According to water service availability form dated November 2020, adequate water resources and entitlements are available to serve the Project. In addition, the Project would require wastewater services from the Valley Center Municipal Water District which has adequate services to serve the Project. The new veterinary and dental clinics would connect to the existing Valley Center Municipal Water District water and sewer lines. Therefore, the project would not require the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.

GPU EIR determined impacts associated with new water and wastewater treatment facilities to be less than significant with mitigation. As the Project would have a less-than-significant, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

18(c) The GPU EIR concluded this impact to be less than significant with mitigation. The Project involves new storm water drainage facilities, however, these facilities 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 Project would have a less-than-significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

18(d) The GPU EIR concluded this impact to be significant and unavoidable. The Project would receive water from the Valley Center Municipal Water District which has adequate water to serve the Project according to the water service availability form dated November 2020. As the 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.

18(e) The GPU EIR concluded this impact to be less than significant with mitigation. The Project would require wastewater services from the Valley Center Municipal Water District which has adequate services available to serve the Project. Therefore, the Project would not interfere with any wastewater treatment provider’s service capacity.

As previously discussed, the GPU EIR determined impacts to adequate wastewater facilities to be less than significant with mitigation. 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.

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

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

**Conclusion**

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

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

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

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

**Discussion**

Wildfire was analyzed within the GPU EIR within Section 2.7, Hazards and Hazardous Materials. The Guidelines for Determining Significance stated: the proposed General Plan Update would have a significant impact if it would expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands. In 2019, the issue of Wildfire was separated into its own section within Appendix G of the CEQA Guidelines to incorporate the four issue questions above. The GPU EIR did address these issues within the analysis; however, they were not called out as separate issue areas. Within the GPU EIR, the issue of Wildland Fires was determined to be significant and unavoidable.

The following Technical Studies were prepared for the Project related to Wildfire:

Fire Protection Plan Valley Center Professional Center. Melvin Johnson, Firewise 2000 LLC January 26, 2021.

19(a) The GPU EIR concluded this impact to be significant and unavoidable. The Project site is located within the VHFHSZ. The Project site is within the response area of the Valley Center Fire Protection District (VCFPD). The nearest fire station is Fire Station 1 located at 28234 Lilac Road, Valley Center, CA. Fire Station 1 is the headquarters station which includes administration and fire prevention. One engine company is covered at the fire station with three firefighters staffing the engine. A paramedic ambulance is also staffed at Station 1 with two firefighters. Normal response time for Engine 181 to the project site is less than three minutes based on computer modeling with a travel distance of 1.2 miles. This would meet the response time required for the Project by the County of San Diego General Plan Safety Element of 5 minutes.

The Project access from Valley Center Road would meet County road standards. A turn-around for fire apparatus would be constructed in the parking lot using the main access road and the western turnoff to the second (western) parking lot. The turn-around/access roads would be constructed to meet County of San Diego Fire Code Standard 503.2.6.

As previously stated, Wildfire was analyzed within the GPU EIR within Section 2.7, Hazards and Hazardous Materials and was determined to be significant and unavoidable. 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.

- 19(b) The GPU EIR concluded this impact to be significant and unavoidable. The Project is within the VHFHSZ and within the Urban-Wildfire Interface Zone. The Project would comply with regulations relating to emergency access, water supply, and defensible space specified in the County Fire Code and Consolidated Fire Code. Specifically, all exterior walls would be 1-hour rated firewalls. On the south side of both building, no openings such as doors or windows would be constructed. Both buildings would be fully sprinklered. Well-developed fuel treatments would be required throughout the entire site. A 24-foot wide, paved fire access road would be constructed off of Valley Center Road and would have a fire apparatus turn around built to reduce fire apparatus backing incidents. In addition, the Project includes a new fire hydrant along the proposed access road.

Implementation of these fire safety standards would occur during the building permit process and is consistent with GPU mitigation measure Haz-4.3. In addition, the Project is consistent with the Zoning Ordinance and the density established under the County of San Diego General Plan. Therefore, for the reasons stated above, the Project would not be expected to experience exacerbated wildfire risks due to slope, prevailing, winds or other factors.

As previously stated, Wildfire was analyzed within the GPU EIR within Section 2.7, Hazards and Hazardous Materials and was determined to be significant and unavoidable. The Project would have a less-than-significant impact with the implementation of GPU EIR mitigation measure Haz-4.3 for compliance with the building and fire codes. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 19(c) The GPU EIR concluded this impact to be significant and unavoidable. The Project includes a veterinary and dental clinic. All infrastructure associated with the Project has been incorporated within this analysis. Therefore, no additional temporary or ongoing impacts to the environment related to associated infrastructure would occur that have not been analyzed in other sections of this environmental document.

As previously discussed, the GPU EIR determined impacts from Wildfire to be significant and unavoidable. As the 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.

- 19(d) The GPU EIR concluded this impact to be significant and unavoidable. As previously stated in 19(b), the Project would comply with regulations relating to emergency access, water supply, and defensible space specified in the County Fire Code and Consolidated Fire Code. The Project site is located within a "Landslide Susceptibility Area" as identified in the County Guidelines for Determining Significance for Geologic Hazards and is considered to be Generally Susceptible. The Project site slopes towards the northeast on an average 10 percent slope. In order to assure that any proposed buildings are adequately supported, a Soils Engineering Report is required as part of the grading and 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. Therefore, the Project site would not expose people or structures to significant risk, including downslopes or downstream flooding or landslides, as a result of runoff, post-fire instability, or drainage changes.

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

### **Conclusion**

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

1. No peculiar impacts to the Project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. Feasible mitigation measures contained within the GPU EIR (Haz-4.3) would be applied to the Project. These mitigation measures, as detailed above, require the Project applicant to comply with the building and fire codes.



**Appendices**

Appendix A – References

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

## Appendix A

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

Johnson, Melvin; Firewise 2000, LLC. (January 26, 2021), Fire Protection Plan Valley Center Professional Center

Mizuta, Marc; Mizuta Traffic Consulting. (July 2021). Clarke Dental and Vet Clinics Project Vehicle Miles Traveled and Local Mobility Analysis.

Scheidt, Vincent N. (September 2021), A Summary Biological Report.

Smith, Brian F; Brian F. Smith and Associates (September 21, 2021), Negative Cultural Resources Survey Report

Wynn Engineering, (September 2021), Preliminary Hydrology Study

Wynn Engineering, (September 15, 2021), Stormwater Quality Management Plan (SWQMP) For Priority Development Projects (PDPs)

### References

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

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

## Appendix B

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

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