County of San Diego

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June 20, 2025

Statement of Reasons for Exemption from Additional Environmental Review and 15183 Checklist

Pursuant to CEQA Guidelines §15183

Project Name: Balazs Residential Project
Project Record Numbers: PDS2022-LDGRMJ-30446
Environmental Log Number:

APN(s): 267-147-06-00

Lead Agency Name and Address:
County of San Diego
Planning and Development Services
5510 Overland Avenue, Suite 110
San Diego, CA 92123-1239

County Staff Contact:
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Project Location:
The Balazs Residential Project (project) is located on 2.41 acres at the northern terminus of Artesian Breeze Way within unincorporated San Diego County (Assessor's Parcel Number 267-147-06-00).

Project Applicant Name and Address:

General Plan

Community Plan:	San Dieguito
Regional Categories:	Semi-Rural
Land Use Designations:	Rural Residential (RR)
Density:	1 Dwelling (DU) per Acre
Floor Area Ratio (FAR)	-

Zoning

Use Regulation:	Rural Residential (RR)
Minimum Lot Size:	2Acres
Special Area Regulation:	-

Description of Project:
The proposed project includes site grading and construction of a two-story 8,979-square-foot (sf) single-family residence with a basement, attached garage, and associated improvements on an approximately 2.41-acre project site. The project would also include a swimming pool, sports court, retaining walls, and associated hardscape/landscape improvements. In addition, the project would include a 603-sf lower-level garage and a 565-sf ground level garage, 270 sf of storage space, a 494-sf first flood deck, and a 508-sf second flood deck.

Construction of the project would include site grading and excavation for foundations and utilities, building construction, paving, and architectural coating (Figure 3, Grading Plan). The project would require approximately 1,700 cubic yards (cy) of cut, 4,100 cy of fill, and 2,600 cy of import. Project construction would occur over a period of approximately 12 months.

The project would be served by Olivenhain Municipal Water District for sewer and water. Fire service would be provided by the Rancho Santa Fe Fire Protection District.

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

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

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

Summary of Findings
The Balasz Residential Project is consistent with the analysis performed for the GPU EIR. Further, the GPU EIR adequately anticipated and described the impacts of the project, identified applicable mitigation measures necessary to reduce project-specific impacts, and the project implements these mitigation measures (see http://www.sdcounty.ca.gov/PDS/gpupdate/docs/BOS_Aug2011/EIR/FEIR_7.00_-_Mitigation_Measures_2011.pdf for complete list of GPU Mitigation Measures).

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

In accordance with CEQA Guidelines Section 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 develop a single-family residence on a vacant lot that is surrounded by similar single-family residences, which is consistent with the Rural Residential (RR) land use and zoning designations and development density established by the GPU and the certified GPU EIR.

2. **There are no Project specific effects which are peculiar to the Project or its site, and which the GPU EIR failed to analyze as significant effects.**

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

In addition, as explained further in the Section 15183 Checklist below, all project impacts were adequately analyzed by the GPU EIR. The project could result in potentially significant impacts to biological resources, cultural resources, paleontological resources, and tribal cultural resources. 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.

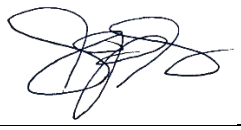
The project is consistent with the density and use characteristics of the development considered by the GPU EIR. The GPU EIR considered the incremental impacts of the project, and as explained further in the Section 15183 Exemption Checklist below, no potentially significant off-site or cumulative impacts 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 Section 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 Section 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.



	6/20/2025
Signature	Date
Souphalak Sakdarak	Environmental Planner
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 CEQA 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 Section 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
1. AESTHETICS – Would the Project:			
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☐
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	☐	☐	☐
d) Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?	☐	☐	☐

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 (GPU) Environmental Impact Report (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 includes development of a new two-story 8,979-sf single-family residence on an approximately 2.41-acre project site. Surrounding land uses consist of similar rural single-family residences to the west, south, and east and large single-family residences to the north. No RCAs are located in proximity to the project site. Due to distance and intervening highways, structures, and topography, no impacts would occur to these RCAs. Additionally, given that the proposed project would be consistent with the rural residential environment surrounding the project site, the proposed project would not substantially degrade a scenic vista. Therefore, the project would have a less than significant effect on a scenic vista.

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

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

The project site is not located near or visible within the composite viewshed of a State scenic highway and will not damage or remove visual resources within a State scenic highway. The nearest designated State scenic highway is a portion of SR-52 located nearly 13 miles southeast of the project site. Additionally, the project is located approximately 6 miles east of I-8, which is identified as eligible for designation as a State Scenic Highway. I-8 is also listed as a Scenic Highway in the County's Conservation and Open Space Element of the General Plan. The project site is also located more than 1 mile southeast of Del Dios Road, which is listed as a Scenic Highway in the County's Conservation and Open Space Element of the General Plan. Due to distance, topography, and intervening structures, the project site is not visible from these highways. As such, the project site is not visible within the composite viewshed of a State scenic highway or County Scenic Corridor and will not damage or remove visual resources within a State scenic highway or County Scenic Corridor. Therefore, impacts would be less than significant.

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

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

The project site is located in a rural residential area and is surrounded by rural single-family residences to the west, south, and east, and large single-family homes to the north. The project includes development of a new two-story 8,979-sf single-family residence on an approximately 2.41-acre project site, which is consistent with the Rural Residential land use and zoning designations for the project site. Public views of the project site are limited to Caminito Del Vienticito/Artesian Breeze Way and other surrounding streets (e.g., Top O the Morning Way). The project would be consistent with the surrounding rural residential landscape, and therefore, would not substantially degrade the existing visual character or quality of public views of the site and its surroundings. The project would be required to

include preparation of Landscape Plans pursuant to the County's Water Efficient Landscape Design Manual and Water Conservation in Landscaping Ordinance. The project would also be in conformance with the County's Grading Ordinance. Therefore, the project would not conflict with applicable zoning and other regulations governing scenic quality.

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

1(d) The GPU EIR concluded this impact to be significant and unavoidable. The proposed project would use outdoor lighting and is located within Zone B as identified by the San Diego County Light Pollution Code, which is Zone B is any area of the unincorporated County that is not within 15 miles from the Mount Palomar or Mount Laguna observatory. However, the project would not adversely affect nighttime views or astronomical observations because the project would conform to the County's Light Pollution Code (Section 51.201-51.209), including the Zone B lamp type and shielding requirements per fixture and hours of operation limitations for outdoor lighting and searchlights. The code was developed by the County in cooperation with the lighting engineers, astronomers, and other experts to effectively address and minimize the impact of new sources light pollution on nighttime views. Compliance with the Code would be required prior to issuance of a building permit. Thus, the proposed project would not create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area.

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

Conclusion

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

1. No peculiar impacts to the project or its site have been identified.

2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.

3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.

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

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
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?	☐	☐	☐
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐
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. Based on the County of San Diego Geographical Information System (GIS) and aerial imagery, the project site does not contain any agricultural resources, lands designated as 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. Therefore, no agricultural resources including Prime Farmland, Unique Farmland, or Farmland of Statewide or Local Importance would be converted to a non-agricultural use.

As previously discussed, the GPU EIR determined impacts from direct and indirect conversion of agricultural resources to be significant and unavoidable. However, the proposed project would have no impact. Therefore, the project would be consistent with the analysis provided within the GPU EIR.

2(b) The GPU EIR concluded this impact to be less than significant with mitigation. The project site is not zoned for agricultural use, nor is the land is not under a Williamson Act Contract. Therefore, the project does not conflict with existing zoning for agricultural use, or a Williamson Act Contract.

As previously discussed, the GPU EIR determined impacts from land use conflicts to be less than significant with mitigation. As the proposed project would have no 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 does not contain forest lands or timberland. The County of San Diego does not have any existing Timberland Production Zones. In addition, the project is consistent with existing zoning, and a rezone is not proposed. Therefore, project implementation would not conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland production zones.

As previously discussed, the GPU EIR determined impacts from direct and indirect conversion of agricultural resources (including forest resources), to be significant and unavoidable. However, the project would have no 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 response 2(a), the project site would not be considered an agricultural resource. Therefore, the project would not result in any conversion of onsite agricultural resources to a non-agricultural use.

As previously discussed, the GPU EIR determined impacts from direct and indirect conversion of agricultural resources (including forest resources) to be significant and unavoidable. However, the proposed project determined no impacts would occur to agricultural resource. Therefore, the project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

Conclusion

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

1. No peculiar impacts to the project or its site have been identified.

2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.

3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.

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

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

Air quality and greenhouse gas (GHG) modeling was prepared for the project by Harris & Associates, dated April 21, 2025. The following responses have incorporated the analysis from the report.

3(a) The GPU EIR concluded this impact to be less than significant. The regional air quality standards (RAQS) and State Implementation Plan (SIP) rely on the San Diego Association of Government's (SANDAG's) growth projections, which are developed based on proposed buildout of land uses identified in the County's General Plan. Because the RAQS and SIP project future air quality conditions based on growth projections assuming buildout of the County's General Plan, it is assumed that a project involving development that is consistent with the growth anticipated by the County's General Plan are consistent with the RAQS and SIP. According to the 2022 RAQS, mobile sources are the largest contributor to air quality emissions, specifically emissions generated from operations of typical residential and commercial developments, and therefore, can be used to define project intensity (i.e., less mobile emissions results in less land use intensity).

The proposed project would add one single-family residence to the project site, which is consistent with the General Plan land uses and SANDAG growth projections. Therefore, the project would not conflict with the region's future employment and housing needs. This project is not a transportation project that would affect the region's transportation systems and should not increase transportation demands within the local area. Therefore, the project would not induce substantial population and would not conflict with or obstruct implementation of the RAQS and SIP. In addition, the construction and operational emissions from the project are anticipated to be below established screening-level thresholds (SLTs), as addressed under Section 3(b), and would not violate any ambient air quality standards.

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

3(b) The GPU EIR concluded impacts to be significant and unavoidable. San Diego County is currently in non-attainment for ozone (O_3) under the National Ambient Air Quality Standard (NAAQS). San Diego County is also presently in non-attainment for O_3, particulate matter less than or equal to 10 microns (PM_{10}), and particulate matter less than or equal to 2.5 microns ($PM_{2.5}$) under the California Ambient Air Quality Standard (CAAQS). O_3 is formed when volatile organic compounds (VOCs) and nitrogen oxides (NO_x) 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 NOx include any source that burns fuel. Sources of PM_{10} and $PM_{2.5}$ in both urban and rural areas include the following: 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.

A project would have a significant direct impact related to criteria pollutants if it would exceed any of the County's SLTs presented in Table 2 below. The County's SLTs are based on San Diego Air Pollution Control District (SDAPCD) Rules 20.1, 20.2, and 20.3 and were adopted from the SDAPCD Air Quality Impact Analysis trigger level thresholds to align with attainment of the NAAQS and be protective of public health. Therefore, air quality emissions below the SLTs would meet the NAAQS. The NAAQS were developed to protect public health, specifically the health of "sensitive" populations, including asthmatics, children, and the elderly.

Table 2
County of San Diego Screening Level Thresholds

Pollutant	Emission Rate		
	Pounds/Hour	Pounds/Day	Tons/Year
Respirable Particulate Matter (PM_{10})	--	100	15
Fine Particulate Matter ($PM_{2.5}$)	--	55[a]	10[a]
Oxides of Nitrogen (NO_X)	25	250	40
Oxides of Sulfur (SO_X)	25	250	40
Carbon Monoxide (CO)	100	550	100
Lead and Lead Compounds	--	3.2	0.6
Volatile Organic Compounds (VOCs)	--	75[b]	13.7[c]

SOURCE: SDAPCD, Rules 20.1, 20.2, 20.3; County of San Diego 2007.
[a] Based on the U.S. EPA "Proposed Rule to Implement the Fine Particle National Ambient Air Quality Standards" published September 8, 2005. Also used by the South Coast Air Quality Management District.
[b] Threshold for VOCs based on the threshold of significance for VOCs from the South Coast Air Quality Management District for the Coachella Valley.
[c] 13.7 tons per year threshold based on 75 pounds per day multiplied by 365 days per year and divided by 2,000 pounds per ton.

Air emissions were calculated using California Emissions Estimator Model (CalEEMod) 2022.1.1.29. CalEEMod is a tool used to estimate air emissions resulting from land development projects in the state of California. The model generates air quality emission estimates from construction activities and breaks down operational criteria pollutant emissions into three categories: mobile sources (e.g., traffic), area sources (e.g.,

landscaping equipment, consumer projects, and architectural coatings), and energy sources (e.g., natural gas heating). CalEEMod provides emission estimates of NO_X, carbon monoxide (CO), oxides of sulfur (SO_X), respirable particulate matter (PM_{10}), fine particulate matter ($PM_{2.5}$), and VOCs. Inputs to CalEEMod include such items as the air basin containing the project, land uses, trip generation rates, trip lengths, duration of construction phases, construction equipment usage, grading areas, as well as other parameters.

The project includes development of a new two-story 8,979-sf single-family residence on an approximately 2.41-acre project site. Project construction is estimated to take 12 months. On-site emissions are attributed to emissions occurring within the project area, such as the activity of construction equipment. Off-site emissions related to the project include vendor, hauling, and worker vehicle trips to and from the project site. Emissions generated during construction activities would be temporary and localized. Earthwork activities during construction of the project would require 700 cy of cut, 4,100 cy of fill, and 2,600 cubic yards of import. 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 include the following project design features, consistent with local, regional, and state regulations as well as GPU EIR mitigation measures Air-2.5, Air-2.6, Air-2.7, and Air-2.9.

- Application of water three times daily during grading on active grading sites.
- Application of water three times daily to unpaved roads.
- Reduced speeds to 15 miles per hour (mph) on unpaved roads.
- Use of architectural coatings that are consistent with SDAPCD Rule 67.0.1, with a VOC content of 100 g/l or less for non-flat coatings and 50 g/l or less for flat coatings.
- Use of U.S. Environmental Protection Agency (USEPA) certified Tier 3 and Tier 4 engines with diesel particulate filters (DPF) during all grading and site preparation activities.

With the application of the measures listed above, project construction emissions associated with the proposed residential development are not anticipated to exceed the County's construction SLTs, based on the results of the CalEEMod report.

The main operational impacts associated with the project would include impacts associated with mobile sources; with additional impacts associated with area sources such as energy use and landscaping. Emissions of all pollutants would be below the County's recommended SLTs. 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 mitigation measures Air-2.5, Air-2.6, Air-2.7, and Air-2.9.

3(c) The GPU EIR concluded this impact to be significant and unavoidable. San Diego County is presently in non-attainment for the NAAQS and CAAQS for O_3. San Diego County is also presently in non-attainment for PM_{10} and $PM_{2.5}$ under the CAAQS. O_3 is formed when VOCs and oxides of nitrogen (NO_X) 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_{10} and $PM_{2.5}$ 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_{10}, $PM_{2.5}$, NO_X, and VOC emissions from construction/grading activities; however, it would not exceed established SLTs (see Section 3(b) above). Additionally, grading and all other construction activities would be subject to the measures listed above, including the implementation of dust control measures consistent with the County of San Diego Grading Ordinance and SDAPCD Rule 55. Additionally, the project would include the use of USEPA certified Tier 3 and Tier 4 construction equipment with DPF or equivalent for the construction activity, which would further reduce emissions of particulate matter during construction.

The project would generate PM_{10}, $PM_{2.5}$, and NO_X emissions during project operations primarily from mobile sources (i.e., vehicle trips), and VOCs from area and mobile sources. However, as previously described, operational emissions of all pollutants would be below the County's recommended SLTs.

Cumulative impacts could occur if the most intensive phases of construction for the proposed 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_{10}. However, the project's estimated emissions of criteria air pollutants, specifically PM_{10}, was estimated to be 8.91 lb/day, which would be well below the County's SLT of 100 lb/day for PM_{10} during construction activities. Further, due to the highly dispersive nature of particulate matter, a cumulative impact during construction activities would only occur if a project adjacent to the proposed project undergoes simultaneous grading/earthwork activities and emits significantly greater PM_{10} 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 Section 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. However, 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 – 12th Grade), hospitals, resident care facilities, day-care centers, residences, or other facilities that may house individuals with health conditions that would be adversely impacted by changes in air quality. Because the project proposes residential land uses, the proposed project would

not be considered a point-source of significant operational emissions. The nearest sensitive receptors to the project site are single-family residences as close as approximately 120 feet to the south and 100 feet to the north. The project would generate limited construction emissions in the vicinity of sensitive receptors.

Carbon Monoxide Hotspot Analysis

As previously discussed, carbon monoxide is a colorless, odorless, poisonous gas that may be found in high concentrations near areas of high traffic volumes. CO emissions are a function of vehicle idling time, meteorological conditions, and traffic flow. The SDAB is in attainment of State and federal CO standards. The SDAPCD measured a maximum 8-hour CO concentration of 1.4 parts per million (ppm) inn 2020 (SDAPCD 2021). CO concentrations were well below the federal standard 8-hour standard of 9 ppm.

A CO hotspot analysis is required by the County if a proposed development would cause road intersections to operate at or below a LOS E with intersection peak-hour trips exceeding 3,000 trips. As described above, daily trips would be limited due to the one small scope of the project (one single-family residence; see Section 16. Transportation). Therefore, the negligible additional traffic generated during project operation would not cause intersections in the vicinity of the project site to operate at or below LOS E, and a CO hotspot analysis is not required for the proposed project as project-generated trips would not result in, or substantially contribute to, CO concentrations that exceed the eight-hour ambient air quality standards along area roadways and intersections.

Toxic Air Contaminants (TACs)

Diesel particulate matter (DPM) is the primary toxic air contaminant (TAC) of concern and is generated from fuel consumption in heavy construction equipment. As discussed in Section 3(b), the NAAQS and CAAQS would not be exceeded due to project contributions for both construction and operations. 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.

Construction-related activities would result in short-term, project-generated emissions of DPM exhaust emissions from off-road, heavy-duty diesel equipment for site preparation grading, building construction, and other construction activities. DPM was identified as a TAC by CARB in 1998. The potential cancer risk from the inhalation of DPM (discussed in the following paragraphs) outweighs the potential non-cancer health impacts and is therefore the focus of this discussion (CARB 2022).

Generation of DPM from construction projects typically occurs in a single area for a short period. Construction of the proposed project would occur over approximately 14 months. The dose to which the receptors are exposed is the primary factor used to determine health risk. Dose is a function of the concentration of a substance or substances in the environment and the extent of exposure that person has with the substance. Dose is positively correlated with time, meaning that a longer exposure period would result in a higher exposure level for the Maximally Exposed Individual. The risks estimated for a Maximally Exposed Individual are higher if a fixed exposure occurs over a longer period of time. According to the California Office of Environmental Health Hazard Assessment (OEHHA), health risk assessments (HRA), which determine the exposure of sensitive receptors to toxic emissions, should be based on a 30-year exposure period (assumed to be the approximate time that a person spends at a single household location). OEHHA recommends this risk be bracketed with nine-year and 70-year exposure periods and that

HRA should be limited to the period/duration of activities associated with the project (OEHHA 2015).

The maximum on-site $PM_{2.5}$ emissions, which are used to represent DPM emissions for this analysis, would occur during site preparation and grading activities. While site preparation and grading emissions represent the worst-case condition, such activities would only occur for approximately two months, which represents less than one percent of the typical health risk calculation periods of 9 years, 30 years, and 70 years. $PM_{2.5}$ emissions would decrease for the remaining construction period because construction activities such as building construction and paving would require less construction equipment. Therefore, given the aforementioned, DPM generated by project construction is not expected to create conditions where the probability that the Maximally Exposed Individual would contract cancer is greater than ten in one million or to generate ground-level concentrations of non-carcinogenic TACs that exceed a Hazard Index greater than one for the Maximally Exposed Individual. Lastly, the project would not generate trips from large or heavy-duty vehicles that could generate mobile diesel emissions due to the passenger vehicle-serving nature of the proposed use.

Additionally, the proposed residential use is not a TAC emitter and would not constitute a cancer risk to sensitive receivers. Therefore, construction and operation of the proposed project would not generate significant amounts of TACs that would adversely impact sensitive receptors in the vicinity of the project site.

As discussed in Section 3(b), the proposed project would not result in construction or operational emissions that would exceed the County's SLTs for health risk. Thus, neither construction nor operation of the project would expose sensitive receptors to an incremental health risk.

The project would use USEPA certified Tier 3 and Tier 4 construction equipment with DPF or equivalent for construction activities in accordance with County PDS requirements. Using Tier 4 construction equipment with DPF would further reduce cancer risks at all receptors surrounding the project site. It should be noted that even with the assumption that the construction fleet is represented by the average fleet for the year 2025, the impact would not exceed the County's threshold of 10 in a million. The average fleet does include equipment that is rated to Tier 3 and Tier 4; and as time progresses, more of the construction equipment in the fleet will meet more stringent standards. The risk associated with exposure to diesel particulate from construction of the project is therefore not significant. Abidance to the County of San Diego Grading Ordinance, SDAPCD Rule 55, and the application of Tier 3 and Tier 4 engines with DPF would reduce localized construction emissions. Further, exposure to construction emissions would be temporary and would not expose sensitive receptors to excessive concentrations of air pollutants. Therefore, the project would not expose sensitive receptors to an incremental health risk. Construction and operational impacts to sensitive receptors would be less than significant.

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

3(e) The GPU EIR concluded this impact to be less than significant. SDAPCD Rule 51, commonly referred to as the public nuisance rule, prohibits emissions from any source whatsoever in such quantities of air contaminants or other material that cause injury,

detriment, nuisance, or annoyance to the public health or damage to property. The potential for an operation to result in odor complaints from a "considerable" number of persons in the area would be considered a significant, adverse odor impact.

The project would involve the temporary use of diesel-powered construction equipment, which would generate exhaust that may be noticeable for short durations at adjacent properties. However, construction activities would be temporary, and construction emissions would not exceed San Diego County SLTs.

The land use and industrial operations typically associated with odor complaints include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, refineries, landfills, dairies, and fiberglass molding. The proposed operation of the single-family residence is not typically associated with objectionable odors. Odors associated with the project would be typical of single-family residences that surround the project site. Furthermore, any odors generated from the proposed use would dissipate and be reduced with increasing distance from the project site. Therefore, the project would not generate objectionable odors.

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, Air-2.6, Air-2.7, and Air-2.9) would be applied to the project.

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
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?	☐	☐	☐
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?	☐	☐	☐
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?	☐	☐	☐
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?	☐	☐	☐
e) Conflict with the provisions of any adopted Habitat Conservation Plan, Natural Communities Conservation Plan, other approved local, regional or state habitat conservation plan or any other local policies or ordinances that protect biological resources?	☐	☐	☐

Discussion

A Biological Resources Letter Report was prepared for the project by Klutz Biological Consulting, dated May 27, 2025. The Biological Resources Letter Report consists of a literature review and results of a field reconnaissance survey conducted on August 25, 2023. The following responses have incorporated the analysis from the report.

4(a) The GPU EIR concluded this impact to be significant and unavoidable. During the site surveys conducted for the Biological Resources Letter Report, 44 wildlife species were documented, including 32 birds, two mammals, one lizards, two mammals, four butterflies, and four bumblebee species. Common species observed included yellow faced bumblebee (*Bombus vosnesenskii*), Common raven (*Corvus corax*), House finch (*Haemorhous mexicanus*), Song sparrow (*Melospiza melodia*), California towhee (*Melozone crissalis*), and Lesser goldfinch (*Spinus psaltria*). During on-site field surveys, two special status wildlife species were observed, including one foraging Crotch's bumblebee (*Bombus cortchii*) and one Cooper's Hawk (*Accipiter cooperi*), which were

observed during focused coastal California gnatcatcher surveys. No other sensitive wildlife species were observed in the study area.

Based on the literature search conducted prior to the field survey 17 special status plant species were identified as potentially occurring within the general project vicinity. Focused rare plant surveys detected one special status plant species on-site. A population of approximately 18 California adolphia (*Adolphia californica*; County List B) shrubs were observed and mapped within the northeastern portion of the property. The Biological Resources Letter Report determined that this population is located outside of the proposed development and would not be directly impacted by the proposed project. However, the project has the potential to indirectly impact 18 California adolphia plants. These sensitive plants will not be directly impacted by the proposed project footprint but since they will not be conserved within an on-site open space easement they have been assessed as impacted. California adolphia impacts require species-based mitigation at a 1:1 ratio (MM BIO-1). No other special status rare plant species were detected during the field survey, and none are considered to have high potential or likely to occur on-site.

Wildlife species identified during the literature search as potentially occurring on-site included Cooper's hawk (*Accipiter cooperi*), Sharp-shinned hawk (*Accipiter striatus*), Rufous-crowned sparrow (*Aimophila ruficeps canescens*), Tricolored blackbird (*Agelaius tricolor*), Rufous-crowned sparrow (*Aimophila ruficeps canescens*), Grasshopper sparrow (*Ammodramus savannarum*), Bell's sage sparrow (*Amphispiza belli belli*), Silvery legless lizard (*Anniella pulchra pulchra*), Pallid bat (*Antrozous pallidus*), Great blue heron (*Ardea herodias*), Short-eared owl (*Asio flammeus*), Burrowing owl (*Athene cunicularia hypogea*), San Diego fairy shrimp (*Branchinecta sandiegoensis*), Canada goose (*Branta canadensis*), Dulzura California pocket mouse (*Chaetodipus californicus femoralis*), Northwestern San Diego pocket mouse (*Chaetodipus fallax fallax*), Coastal rosy boa (Charina trivirgata roseofusca), Mexican long-tongued bat (*Choeronycteris mexicana*), Northern harrier (*Circus cyaneus hudsonius*), Orange-throated whiptail (*Cnemidophorus hyperythrus*), Coastal western whiptail (*Cnemidophorus tigris multiscutatus*), Yellow-billed cuckoo (*Coccyzus americanus occidentalis*), San Diego banded gecko (*Coleonyx variegatus abbottii*), Northern red diamond rattlesnake (*Crotalus ruber ruber*), Monarch butterfly (Danaus plexippus), San Diego ringneck snake *(Diadophis punctatus similis*), Black-shouldered kite (*Elanus caeruleus*), Horned lark (*Eremophila alpestris actis*), Coronado skink (*Eumeces skiltonianus interparietalis*), Greater western mastiff bat (*Eumops perotis californicus*), Merlin (*Falco columbarius*), Prairie falcon (*Falco mexicanus*), American peregrine falcon (*Falco peregrinus anatum*), Mountain lion (*Felis concolor*), Loggerhead shrike (*Lanius ludovicianus*), California gull (*Larus californicus*), San Diego blacktailed jackrabbit (*Lepus californicus bennettii*), California lindellaria (*Linderiella occidentalis*), Coastal giant skipper (*Megathymus yuccae harbisoni*), San Diego desert woodrat (*Neotoma lepida intermedia*), Big free-tailed bat (*Nyctinomops macrotis*), Pocketed free- tailed bat (*Nyctinomops femorosaccus*),
Southern mule deer (*Odocoileus hemionus*), Robinson’s beetle (*Phobetus robinsoni*), San Diego horned lizard (Phrynosoma coronatum blainvillei), Bank swallow (*Riparia riparia*), California gnatcatcher (*Polioptila californica*), Coast patch-nosed snake (*Salvadora hexalepis virgultea*), Western spadefoot toad (*Scaphiopus hammondii*), Riverside fairy shrimp (*Streptocephalus woottoni*), and American badger (*Taxidea taxus*). These species have the potential to occur because they have been previously identified in close proximity to the project site.

Due to the proximity of the project site to existing development and the overall small size of the study area the site contains low quality or limited habitat for large mammals. The

site contains areas that could support raptor foraging, although no raptor nests were observed on-site. On-site bird species have the potential to nest within the vegetation associated with the Diegan coastal sage scrub, non-native grasslands, and the eucalyptus woodland habitats. Active bird nests are protected under the Migratory Bird Treaty Act (MBTA).

California gnatcatcher (*Polioptila californica californica*) Status: Federally Threatened, California Species of Concern, County Group 1 – The County's scoping letter requested focused presence/absence surveys be conducted for the California gnatcatcher. These surveys were performed by Antonette Gutierrez in accordance with U.S. Fish and Wildlife Service protocol. Three surveys were conducted in the months of March and April of 2024, and the results were negative for the presence of this species on-site. Overall habitat quality for the California gnatcatcher was determined to be of low quality, and the site is unlikely to support this species.

As described above, two special status wildlife species were observed during on-site field surveys, including one foraging Crotch's bumblebee and one Cooper's Hawk:

- **Crotch's bumble bee (CBB) Status: Candidate Listing under the State Endangered Species Act** – Field surveys identified one foraging CBB Queen during the foundress early flight season (March 2024). This CBB was observed foraging briefly on black sage and then flew off-site and was not seen again. Following the observation, a search of the site was conducted on each additional site visit to determine if CBB continued to utilize the site for foraging and or nesting. No further observations of CBB occurred and no CBB nest sites were observed. During each additional survey on-site, particular attention was given to identifying all Bombus species. Three additional Bombus species were recorded/observed using the site. Bombus species observed included Western bumble bee (*Bombus californicus*), Yellow bumble bee (*Bombus vosnesenskii*), and Black-tailed bumble bee (*Bombus melanopygus*). All three of these species were observed regularly foraging on-site and a yellow bumble bee nest site was also detected. The observation of CBB on-site is not considered significant because a nest location was not observed and regular use of the site by CBB queens, gynes, worker or males was not observed. However, to ensure the project does not impact CBB, mitigation (MM BIO-2) has been included to require the project to perform a pre-construction nest survey prior to any clearing and grubbing during the CBB nesting period (March 15-September 1st).
- **Cooper's Hawk Status: County Group 1** – One Cooper's hawk was observed during the focused California gnatcatcher surveys. This individual was observed flying overhead but may also utilize the site for perching and foraging. The eucalyptus woodland on-site does represent potential nesting habitat for Cooper's hawk and other raptors, but no nests were observed during the field surveys. As such, the project would impact suitable nesting and foraging habitat for Cooper's Hawk. To avoid impacts to Cooper's Hawk and other migratory birds and raptors, a pre-construction survey would be required by MM BIO-3.

Based on the determinations of the Biological Resources Letter Report, the project would have the potential to indirectly impact 18 California adolphia plants, and directly impact CBB and migratory birds, including Cooper's Hawk. Given the potential for these impacts, the project is required to provide off-site mitigation for California adolphia (MM BIO-1) and conduct pre-construction surveys for CBB (MM BIO-2) and migratory birds and raptors (MM BIO-3). Additionally, MM BIO-4 would require the landscape plan to stipulate that project landscaping would not include exotic plant species listed on the California Invasive Plant Council's "Invasive Plant Inventory" list. With implementation of MM BIO-1 through

-4, project impacts to species identified as a candidate, sensitive, or special status species would be less than significant.

As previously discussed, the GPU EIR determined impacts to special status species as significant and unavoidable. The project impacts were also determined to be potentially significant. However, the proposed project would incorporate Mitigation Measures BIO-1 through BIO-4 for a less than significant impact with mitigation. Therefore, the project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

BIO-1: California Adolphia Mitigation

Impacts to 18 California adolphia plants will either be mitigated through off-site conservation or through the implementation of an off-site restoration/translocation program. The preferred approach to mitigate these impacts would be through the off-site purchase and preservation of 18 California adolphia plants. If off-site preservation of California adolphia plants is not feasible, then the project would mitigate impacts by implementing a restoration/translocation program at the County's Lusardi Creek Preserve. These options are described in more detail below.

The Preferred Option includes the purchase of a conservation easement on a 0.99-acre property located approximately 3 miles north of the proposed project site, within the North County Multiple Species Conservation Program (NC MSCP) planning area. The property contains approximately 44 California adolphia plants, as well as two other sensitive plant populations: wart-stem lilac (*Ceanothus verrucosus*) and ashy spike moss (*Selaginella cinerascens*). If implemented, the effective mitigation ratio for California adolphia would be 2.4:1. Additional details and requirements for this option include:

- Purchase of mitigation credits from the current property owner and recordation of a biological conservation easement.
- Coordination with the Center for Natural Lands Management (CNLM) to integrate the property into existing CNLM management actions or programs on adjacent lands. Initial discussions indicate CNLM is potentially amenable to managing this property as part of its Escondido Creek holdings.
- County and Wildlife Agency approval to allow mitigation of species impacts within the NC MSCP Plan Area, rather than within the South County MSCP (SC MSCP) planning area.
- No additional long-term management actions would be required, aside from integration with CNLM's existing management program for the Escondido Creek Preserve.

The Secondary Option involves the preparation and implementation of a restoration/translocation plan for California adolphia within the County of San Diego Department of Parks and Recreation's (DPR) Lusardi Creek Preserve. This option would require:

- Submittal and approval of a conceptual translocation/restoration plan by Planning and Development Services (PDS).
- Approval of the restoration/translocation plan and the proposed location within the Lusardi Creek Preserve by DPR.
- Implementation of the plan, which would include a three-to-five-year monitoring period.
- Success criteria including at least 100% survivorship of 18 California adolphia plants.
- Restoration would involve planting nursery-grown container stock, propagating cuttings from individuals impacted by the project, and translocating plants from the project site. The program would be designed to not only restore California adolphia but also enhance the overall habitat within the mitigation site by implementing management and maintenance actions within a 10-foot buffer from each of the plantings.

If both mitigation options are deemed viable, the project applicant reserves the right to pursue the option that facilitates the fastest approval process to expedite the issuance of building and grading permits.

BIO-2: Crotch's Bumble Bee Pre-construction Surveys

If any construction work is proposed to occur during the Crotch's bumble bee (CBB) nesting period (March 15-September 1st), a qualified biologist shall be required to conduct a CBB survey no more than three days prior to any clearing and grubbing activities to ensure that no CBB nests in the project area would be impacted. If an active nest is identified, a buffer would be established between the construction activities and the nest so that nesting activities are not interrupted. The buffer should be a minimum of 300 feet, be delineated by temporary fencing, and remain in effect as long as construction is occurring or until the nest is no longer active. No project construction would be allowed to occur within the fenced zone until the nest is no longer active and will not be impacted by the project.

BIO-3: Cooper's Hawk/Migratory Birds and Raptors Pre-construction Surveys

If any construction work is proposed to occur during the County of San Diego migratory bird or raptor breeding season (February 1 through August 31), a qualified biologist shall be required to conduct a bird and raptor survey no more than three days prior to scheduled operations to ensure that no nesting birds in the project area would be impacted. If an active nest is identified, a buffer would be established between the construction activities and the nest so that nesting activities are not interrupted. The buffer should be a minimum of 300 feet for migratory birds and 500 feet for raptors, be delineated by temporary fencing, and remain in effect as long as construction is occurring or until the nest is no longer active. No project construction would be allowed to occur within the fenced zone until the young have fledged and will not be impacted by the project.

BIO-4: Invasive Plant Mitigation

The project landscape plan shall stipulate that project landscaping will not include exotic plant species listed on the California Invasive Plant Council's (Cal-IPC) "Invasive Plant Inventory" list.

4(b) The GPU EIR concluded this impact to be significant and unavoidable. The project site is located within the South County MSCP planning area of the County. Specifically, the site is mapped within a Minor Amendment Area and development on-site is subject to the County's Biological Mitigation Ordinance (BMO). However, the study area does not qualify as a Biological Resource Core Area (BRCA) as defined by the County's BMO.

As previously described, the project site is surrounded to the west, south, and east by rural single-family residences and to the north by other large single-family residences. The Biological Resources Letter Report determined that the project study area (i.e., project site and a 100-foot buffer) consists of the following vegetation communities:

- Diegan Coastal Sage Scrub: On-site this habitat consists of a mixture of undisturbed and disturbed stands of primarily black sage, white sage (*Salvia apiana*), California buckwheat and California sagebrush. Overall shrub density and cover is low to moderate. Areas between shrubs are primarily comprised of small boulders/rock outcrops and non-native grasses with sparse native annual cover. Approximately 1.53 acres of disturbed and undisturbed Diegan coastal sage scrub occurs on-site.
- Non-native Grassland: Areas mapped as non-native grassland are dominated by non-native plant species comprised primarily by cultivated oat (*Avena sativa*), ripgut grass

(*Bromus diandrus*), Russian thistle (*Salsola tragus*), field bindweed (*Convolvulus arvensis*), and redstem filaree (*Erodium cicutarium*). Smaller amounts of black mustard (*Brassica nigra*), Asian mustard (*Brassica tournefortii*), London rocket (*Sisymbrium irio*), dwarf mallow (*Malva neglecta*), and Bermuda grass (*Cynodon dactylon*) were also observed. Approximately 0.6 acre of non-native grassland habitat occurs on-site.

- Riparian Scrub: Within the study area, this community occurs in one location along the eastern portion of the property and is associated with an ephemeral drainage. Approximately 0.07-acre of riparian scrub habitat occurs on-site.
- Disturbed Habitat: Disturbed habitat occurs off-site only within the 100-foot survey buffer. These areas appear to be associated with brush management zones that are maintained for wildland fire suppression.
- Eucalyptus Woodland: A grove of mature eucalyptus trees occurs in the western portion of the property. This woodland is moderately dense and could support nesting raptor species. Approximately 0.1-acre of Eucalyptus woodland occurs on-site.
- Urban/Developed Land: Within the study area urban/developed lands includes existing residential dwellings, patio structures, hardscape features, dirt roads and as wells as paved roads. Within this landcover type, ornamental vegetation also occurs. All areas mapped as urban/developed are routinely maintained and contain limited biological value. However, mature ornamental trees that occur in this landcover do provide some cover and nesting opportunities for wildlife species. Urban/Developed areas only occur within the study area buffer.

The proposed project would directly impact 1.73 acres of the 2.3 acres on-site. However, due to the project's location within a Minor Amendment Area, the entire property would be considered
impacted, and all sensitive habitats on-site would require habitat-based mitigation (Table 4). This would include impacts to 1.53 acres of Diegan coastal sage scrub, 0.6-acre of non-native grassland, 0.07-acre of riparian scrub and 0.1-acre of eucalyptus woodland.

Impacts to Diegan coastal sage scrub, non-native grassland, and riparian scrub would require mitigation (Diegan Coastal Sage Scrub Tier II habitat at a 1:1 ratio, non-native grassland Tier III at a 0.5:1 and riparian scrub Tier I at a 2:1 ratio). Mitigation for habitat impacts to Tier I, Tier II, and Tier III habitats would be achieved by purchasing 1.97 acre of credits at an approved mitigation bank, including 1.53 acres of Diegan coastal sage scrub (or Tier II habitat), 0.3 acre of non-native grassland (or Tier III habitat), and 0.14-acre of riparian scrub (or Tier III habitat). Table 4 details the impacts to each land cover type and the required mitigation.

Table 4. Project Impacts to Vegetation Communities

Habitat Type	Acres within the Project Site	Impacts within the Project Footprint (acres)	Impacts Outside the Project Footprint (acres)	Mitigation Ratio*	Mitigation Acreage
Urban/Developed	0.0	0.0	0.0	N/A	N/A
Disturbed Habitat	0.0	0.0	0.0	N/A	N/A
Non-Native Grassland	0.6	0.4	0.2	0.5:1	0.3
Diegan Coastal Sage Scrub	1.53	1.3	0.23	1:1	1.53

Riparian Scrub	0.07	0.0	0.07	2:1	0.14
Eucalyptus Woodland	0.1	0.03	0.07	N/A	N/A
Total	2.3	1.73	0.57	N/A	1.97

Note: Mitigation ratios determined through Attachment K of the BMO, assuming that the impact site is not a BRCA and the mitigation site is a BRCA.
Source: Biological Resources Letter Report.

MM BIO-5 would require the project to mitigate impacts to Diegan coastal sage scrub, non-native grassland, and riparian scrub at the appropriate ratios in accordance with the County's BMO. With implementation of MM BIO-5, impacts to vegetation communities would be less than significant.

As previously discussed, the GPU EIR determined impacts to riparian habitat and other sensitive natural communities as significant and unavoidable. The project impacts were also determined to be potentially significant. However, the proposed project would incorporate Mitigation Measure BIO-5 for a less than significant impact with mitigation. Therefore, the project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

BIO-5: Habitat Mitigation

Habitat impacts will be mitigated through the off-site purchase of mitigation credits from a County-approved mitigation bank at the ratios shown in the table below.

Habitat Type	**Acres within the Project Site**	**Mitigation Ratio***	**Mitigation Acreage**
Non-Native Grassland	0.6	0.5:1	0.3
Diegan Coastal Sage Scrub	1.53	1:1	1.53
Riparian Scrub	0.07	2:1	0.14
Eucalyptus Woodland	0.1	N/A	N/A
Total	2.3	N/A	1.97

Note: Mitigation ratios determined through Attachment K of the BMO, assuming that the impact site is not a BRCA and the mitigation site is a BRCA.

4(c) The GPU EIR concluded this impact to be less than significant with mitigation. The Biological Resources Letter Report did not conduct a formal jurisdictional delineation for the project site. A potential jurisdictional wetland/ephemeral drainage occurs along the eastern portion of the property. This feature transports water from off-site, south to the north and then continues northwest beyond the study property. This feature contains sparse wetland plants including black willow and mule-fat. Off-site to the south, the feature appears to be human-made or altered to support storm water run-off. On-site, the drainage widens from a low flow channel of approximately 1-foot to 5-foot in the corner of the property before it then narrows again and flows off-site into the neighboring residential community where it appears to empty into a golf course pond. The connection downstream of the pond to the San Dieguito River does not appear to be maintained. Therefore, this feature would not be classified as a County Resource Protection Ordinance (RPO) wetland. Additionally, this resource would not be directly impacted by the project.

The project would not impact by discharging into, directly removing, filling, or hydrologically interrupting, any federally protected wetlands near the project site. The preparation of a Stormwater Pollution Prevention Plan (SWPPP) and associated best management practices (BMPs) would occur in accordance with the General Construction Permit for stormwater discharges to avoid indirect effects to downstream drainages (see Section 10(a)). Additionally, project construction activities would occur in accordance with the County's Grading Ordinance to avoid erosion and sedimentation impacts on the ephemeral drainages. Therefore, no significant impacts would occur to wetlands or waters of the U.S. as defined by Section 404 of the Clean Water Act and under the jurisdiction of the USACE.

The project would not impact state or federally protected wetlands and thus, would not contribute to a cumulative impact for such habitats.

As previously discussed, the GPU EIR determined impacts to federally protected wetlands as less than significant with mitigation. However, the project would not result in impacts to protected wetlands 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(d) The GPU EIR concluded this impact to be significant and unavoidable. The Biological Resources Letter Report determined that the project site does not contain habitat that supports the movement of fish or wildlife species or native wildlife nursery sites. The project contains sensitive habitats that support special-status species but is surrounded by existing residential properties on all four sides (north, south, west, and east). The County's original MSCP habitat evaluation model mapped the property as containing high to very high habitat; however, since the model was created, the project site has become isolated due to the approval of off-site residential developments surrounding the project site. As such, the project site no longer contains habitat that would be considered to have high or very high lands for landscaped connectivity.

Further, the project site has limited functionality to support wildlife movement. However, a small, disturbed ephemeral drainage parallels the eastern portion of the property, draining from south to north. The drainage appears to be altered or human-made south of the project site and then continues as a natural drainage channel along the eastern border of the site. In the northern corner of the property, the drainage continues northwest through an existing residential community where it empties into a golf course pond. The Biological Resources Letter Report determined that there does not appear to be a natural connection downstream of the pond to the San Dieguito River. On-site, the vegetation within the drainage consists of an open canopy, comprised of primarily mule-fat, while downstream and off-site, the drainage contains a higher density of riparian vegetation before connecting with the golf course pond. The ephemeral drainage would be considered a local wildlife movement corridor allowing movement from south to north into the open space area associated with the golf course downstream. However, the proposed project would not directly impact this drainage feature, the project site as a whole contains limited wildlife movement habitat.

Due to the existing developed nature of the areas surrounding the project site, the proposed project would not contribute to impeding wildlife movement or the use of native wildlife nursery sites. Therefore, no impact would occur.

As previously discussed, the GPU EIR determined impacts to wildlife movement corridors as significant and unavoidable. However, the proposed project would have no 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 GPU EIR concluded this impact to be less than significant. The project site is located in the South County MSCP Subarea Plan and outside a Pre-Approved Mitigation Area (PAMA) or BRCA. The project is consistent with the South County MSCP, Biological Mitigation Ordinance (BMO), and RPO because mitigation would be required to compensate for the loss of significant habitat. Therefore, the project would not 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.

As previously discussed, the GPU EIR determined impacts on local policies and ordinances as well as habitat conservation plans and natural community conservation plans as less than significant. As the proposed project would have a less-than-significant impact for the reasons detailed above, the project would be consistent with the analysis within the GPU EIR because it would not create new impacts, increase impacts, and there is no new information of substantial importance than 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. Mitigation Measures BIO-1 through BIO-5 would be applied to the project.

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
5. Cultural Resources – Would the Project:			
a) Cause a substantial adverse change in the significance of a historical resource as defined in 15064.5?	☐	☐	☐
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to 15064.5?	☐	☐	☐
c) Directly or indirectly destroy a unique geologic feature?	☐	☐	☐
d) Directly or indirectly destroy a unique paleontological resource or site?	☐	☐	☐
e) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☐	☐

Discussion

A Cultural and Paleontological Resources Scoping and Completion Memo was prepared for the project by Donna Beddow, Staff Senior Adjunct Archaeologist, dated April 3, 2023. The following responses have incorporated the analysis from the memo.

5(a) The GPU EIR concluded this impact to be less than significant with mitigation. County records, as well as the database from the South Coastal Information Center has been reviewed and it has been determined that the project site has been previously surveyed (Gallego 99-260 & 06-330, Hector 02-194, Glenn 99-20). All previous studies conducted at the project site were negative. There are no existing buildings on the project site that could be considered a historical resource as defined by CEQA. The project is consistent with surrounding single-family residential uses. Therefore, no impact to historical resources would occur.

As previously discussed, the GPU EIR determined impacts on historic resources to be less than significant with mitigation. The proposed Project was determined to have no impacts on 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. County records, as well as the database from the South Coastal Information Center has been reviewed and it has been determined that the project site has been previously surveyed (Gallego 99-260 & 06-330, Hector 02-194, Glenn 99-20). The project site is located in an area of sensitivity for cultural resources; however, all previous studies conducted at the project site were negative. There are no existing buildings on the project site that could be considered a historical resource as defined by CEQA. The Cultural and Paleontological Resources Scoping and Completion Memo determined that additional studies are not required. Because the area is sensitive for cultural resources, cultural resource monitoring by archaeological and Native American monitors during construction excavation and grading of native soils is required to ensure that potentially buried features are not impacted in accordance with GPU EIR mitigation measure Cul-2.5.

Although Assembly Bill 52 does not apply to this project, tribes who have requested to be noticed of projects subject to Assembly Bill 52 were contacted in May 2025. Two tribes (Jamul Indian Village and Viejas Band of Kumeyaay Indians) requested consultation. During consultation, both tribes requested that monitoring be made a condition of approval and that a Kumeyaay Native American monitor be a part of the monitoring program.

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: Treatment Agreement and Preservation Plan, grading monitoring under the supervision of a County-approved archaeologist and a Native American monitor and conformance with the County's Cultural Resource Guidelines if resources are encountered (GPU EIR mitigation measure Cul-2.5). The project would be conditioned with archaeological and tribal monitoring (Cul-2.5) that includes the requirements below.

As previously discussed, the GPU EIR determined impacts to archaeological resources as less than significant with mitigation. The project determined impacts to archaeological resources as potentially significant. However, the project would incorporate the GPU EIR mitigation measure Cul-2.5 for a less than significant impact with mitigation. Therefore,

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

CUL-1: Archaeological and Tribal Monitoring Program

- Pre-Construction
  - A County-approved archaeologist (Project Archaeologist) shall be contracted to perform archaeological monitoring and a potential data recovery program during all grading, clearing, grubbing, trenching, and construction activities. The Project Archaeologist shall perform the monitoring duties before, during, and after construction pursuant to the most current version of the County of San Diego Guidelines for Determining Significance and Report Format and Requirements for Cultural Resources. The contract or letter of acceptance provided to the County shall include an agreement that the archaeological monitoring will be completed, and a Memorandum of Understanding (MOU) between the Project Archaeologist and the County of San Diego shall be executed. The contract or letter of acceptance shall include a cost estimate for the monitoring work and reporting.

  - The Project Archeologist shall provide evidence that a Luiseño Native American has been contracted by the property owner or their representative to perform Native American Monitoring for the project.

  - The cost of the monitoring shall be added to the grading bonds or bonded separately.

  - The County approved Project Archaeologist and Kumeyaay Native American Monitor shall attend the pre-construction meeting with the contractors to explain and coordinate the requirements of the archaeological monitoring program.

- Construction
  - **Monitoring.** During the original cutting of previously undisturbed deposits, the Project Archaeologist and Kumeyaay Native American Monitor shall be onsite as determined necessary by the Project Archaeologist. Inspections will vary based on the rate of excavation, the materials excavated, and the presence and abundance of artifacts and features. The frequency and location of inspections will be determined by the Project Archaeologist in consultation with the Kumeyaay Native American Monitor. Monitoring of the cutting of previously disturbed deposits will be determined by the Project Archaeologist in consultation with the Kumeyaay Native American Monitor.

  - **Inadvertent Discoveries.** In the event that previously unidentified potentially significant cultural resources are discovered:
    - The Project Archaeologist or the Kumeyaay Native American monitor shall have the authority to divert or temporarily halt ground disturbance operations in the area of discovery to allow evaluation of potentially significant cultural resources.
    - At the time of discovery, the Project Archaeologist shall contact the PDS Staff Archaeologist.
    - The Project Archaeologist, in consultation with the PDS Staff Archaeologist and the Kumeyaay Native American Monitor, shall determine the significance of the discovered resources.
    - Construction activities will be allowed to resume in the affected area only after the PDS Staff Archaeologist has concurred with the evaluation.
    - Isolates and clearly non-significant deposits shall be minimally documented in the field. Should the isolates and/or non-significant deposits not be collected by the Project

Archaeologist, then the Kumeyaay Native American monitor may collect the cultural material for transfer to a Tribal Curation facility or repatriation program.

- If cultural resources are determined to be significant, a Research Design and Data Recovery Program (Program) shall be prepared by the Project Archaeologist in consultation with the Kumeyaay Native American Monitor. The County Archaeologist shall review and approve the Program, which shall be carried out using professional archaeological methods. The Program shall include (1) reasonable efforts to preserve (avoidance) "unique" cultural resources or Sacred Sites; (2) the capping of identified Sacred Sites or unique cultural resources and placement of development over the cap, if avoidance is infeasible; and (3) data recovery for non-unique cultural resources. The preferred option is preservation (avoidance).

- **Human Remains.** If any human remains are discovered:
  - The Property Owner or their representative shall contact the County Coroner and the PDS Staff Archaeologist.
  - Upon identification of human remains, no further disturbance shall occur in the area of the find until the County Coroner has made the necessary findings as to origin. If the human remains are to be taken offsite for evaluation, they shall be accompanied by the Kumeyaay Native American monitor.
  - If the remains are determined to be of Native American origin, the NAHC shall immediately contact the Most Likely Descendant (MLD).
  - 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.
  - The MLD may with the permission of the landowner, or their authorized representative, inspect the site of the discovery of the Native American human remains and may recommend to the owner or the person responsible for the excavation work means for treatment or disposition, with appropriate dignity, of the human remains and any associated grave goods. The descendants shall complete their inspection and make recommendations or preferences for treatment within 48 hours of being granted access to the site.
  - 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.

- **Fill Soils.** The Project Archaeologist and Kumeyaay Native American monitor shall evaluate fill soils to determine that they are clean of cultural resources.

- **Monthly Reporting.** The Project Archaeologist shall submit monthly status reports to the Director of PDS starting from the date of the Notice to Proceed to termination of implementation of the Archaeological and Tribal Monitoring Program. The report shall briefly summarize all activities during the period and the status of progress on overall plan implementation. Upon completion of the implementation phase, a final report shall be submitted describing the plan compliance procedures and site conditions before and after construction.

- Rough Grading
  - **Monitoring Report.** The Project Archaeologist shall prepare one of the following reports upon completion of the earth-disturbing activities that require monitoring and submit the Archaeological Monitoring Report to PDS Project Planning Division for review and approval. Once approved, a final copy of the report shall be submitted to the South Coastal Information Center and any culturally-affiliated Tribe who requests a copy.

- No Archaeological Resources Encountered. If no archaeological resources are encountered during earth-disturbing activities, then submit a final Negative Monitoring Report substantiating that earth-disturbing activities are completed and no cultural resources were encountered. Archaeological monitoring logs showing the date and time that the monitor was on site and any comments from the Native American Monitor must be included in the Negative Monitoring Report.
- Archaeological Resources Encountered. If archaeological resources were encountered during the earth disturbing activities, the Project Archaeologist shall provide an Archaeological Monitoring Report stating that the field monitoring activities have been completed, and that resources have been encountered. The report shall detail all cultural artifacts and deposits discovered during monitoring and the anticipated time schedule for completion of the curation and/or repatriation phase of the monitoring.

- Final Grading
  - The Project Archaeologist shall prepare a final report that documents the results, analysis, and conclusions of all phases of the Archaeological Monitoring Program if cultural resources were encountered during earth-disturbing activities. The report shall include the following, if applicable:
    - Department of Parks and Recreation Primary and Archaeological Site forms.
    - Daily Monitoring Logs
    - Evidence that all cultural materials have been conveyed as follows:
      - Evidence that all prehistoric materials collected during the archaeological monitoring program have been submitted to a San Diego curation facility or a culturally affiliated Native American Tribal curation facility that meets federal standards per 36 CFR Part 79, and, therefore, would be professionally curated and made available to other archaeologists/researchers for further study. The collections and associated records, including title, shall be transferred to the San Diego curation facility or culturally affiliated Native American Tribal curation facility and shall be accompanied by payment of the fees necessary for permanent curation. Evidence shall be in the form of a letter from the curation facility stating that the prehistoric archaeological materials have been received and that all fees have been paid.

        or

        Evidence that all prehistoric materials collected during the grading monitoring program have been repatriated to a Native American group of appropriate tribal affinity and shall be accompanied by payment of the fees necessary, if required. Evidence shall be in the form of a letter from the Native American tribe to whom the cultural resources have been repatriated identifying that the archaeological materials have been received.

      - Historic materials shall be curated at a San Diego curation facility and shall not be curated at a Tribal curation facility or repatriated. The collections and associated records, including title, shall be transferred to the San Diego curation facility and shall be accompanied by payment of the fees necessary for permanent curation. Evidence shall be in the form of a letter from the curation facility stating that the historic materials have been received and that all fees have been paid.

- If no cultural resources are discovered, a Negative Monitoring Report must be submitted stating that the archaeological monitoring activities have been completed. Grading Monitoring Logs must be submitted with the negative monitoring report.

5(c) The GPU EIR concluded this impact to be less than significant. The site does not contain any unique geologic features that have been listed in the County's Guidelines for Determining Significance for Unique Geology Resources nor does the site support any known geologic characteristics that have the potential to support unique geologic features.

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

5(d) The GPU EIR concluded this impact to be less than significant with mitigation. A review of the County's Paleontological Resources Maps and data on San Diego County's geologic formations indicates that the project is located on geological formations that potentially contain unique paleontological resources. Excavating into undisturbed ground beneath the soil horizons may cause a significant impact if unique paleontological resources are encountered. Since an impact to paleontological resources does not typically occur until the resource is disturbed, monitoring during excavation is the essential measure to mitigate potentially significant impacts to unique paleontological resources to a level below significance. As such, GPU EIR mitigation measure Cul-3.1 would be required (MM GEO-1). The project has a low potential for containing paleontological resources and would excavate the substratum and/or bedrock below the soil horizons.

With the implementation of mitigation requirements during project grading operations, potential impacts to paleontological resources would be less than significant. Furthermore, the project would not result in a cumulative impact to paleontological resources because other projects that require grading in sensitive paleontological resource areas would be required to have the appropriate level of paleontological monitoring and resource recovery. In addition, other projects that propose any amount of significant grading would be subject to the requirements for paleontological monitoring as required pursuant to the County's Grading Ordinance. Therefore, the project would not result in a significant direct, indirect, or cumulatively significant loss of paleontological 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.

<u>CUL-2: Paleontological Grading Monitoring</u>

A Qualified Paleontologist shall be contracted to perform paleontological resource monitoring and a fossil recovery program if significant paleontological resources are encountered during all grading, trenching, or other excavation into undisturbed rock layers beneath the soil horizons. The monitoring program shall include the following:

- Pre-Construction
    - A Qualified Paleontologist ("Project Paleontologist") shall perform the monitoring duties pursuant to the most current version of the County of San Diego Guidelines for Determining Significance for Paleontological Resources, and this permit. The contract or letter of acceptance provided to the County shall include an agreement that the grading/ trenching/excavation monitoring will be completed, and a Memorandum of Understanding (MOU) between the Project Paleontologist and the County of San

Diego shall be executed. The contract or letter of acceptance shall include a cost estimate for the monitoring work and reporting.

- The cost of the monitoring shall be added to the grading bonds or bonded separately.
- The Project Paleontologist shall attend the pre-construction meeting with the contractors to explain and coordinate the requirements of the grading monitoring program. The Project Paleontologist shall monitor during the original cutting of previously undisturbed deposits for the project, both on and off site, the Qualified Paleontological Resources Monitor shall be on-site to monitor as determined necessary by the Qualified Paleontologist. The grading monitoring program shall comply with the County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements for Paleontological Resources.

- Construction
  - The Project Paleontologist shall monitor during the original cutting of previously undisturbed deposits for the project, both on and off site. The Qualified Paleontological Resources Monitor shall be on-site to monitor as determined necessary by the Qualified Paleontologist. The grading monitoring program shall comply with the following requirements during grading:
    - If paleontological resources are encountered during grading/excavation, the following shall be completed:
      - The Paleontological Resources Monitor shall have the authority to direct, divert, or halt any grading/excavation activity until such time that the sensitivity of the resource can be determined, and the appropriate salvage implemented.
      - The Monitor shall immediately contact the Project Paleontologist.
      - The Project Paleontologist shall contact the Planning & Development Services immediately.
      - The Project Paleontologist shall determine if the discovered resource is significant. If it is not significant, grading and/or excavation may resume.
    - If the paleontological resource is significant or potentially significant, the Project Paleontologist or Paleontological Resources Monitor, under the supervision of the Project Paleontologist, shall complete the following tasks in the field:
      - Salvage unearthed fossil remains, including simple excavation of exposed specimens or, if necessary, plaster-jacketing of large and/or fragile specimens or more elaborate quarry excavations of richly fossiliferous deposits.
      - Record stratigraphic and geologic data to provide a context for the recovered fossil remains, typically including a detailed description of all paleontological localities within the project site, as well as the lithology of fossil-bearing strata within the measured stratigraphic section, if feasible, and photographic documentation of the geologic setting.
      - Transport the collected specimens to a laboratory for processing (cleaning, curation, cataloging, etc.).

- Rough Grading
  - The Project Paleontologist shall prepare one of the following letters upon completion of the grading activities that require monitoring:
    - If no paleontological resources were discovered, submit a “No Fossils Found” letter from the grading contractor to the PDS Project Planning

Division stating that the monitoring has been completed and that no fossils were discovered, and including the names and signatures from the fossil monitors. The letter shall be in the format of Attachment E of the County of San Diego Guidelines for Determining Significance for Paleontological Resources.

- If Paleontological Resources were encountered during grading, a letter shall be prepared stating that the field grading monitoring activities have been completed, and that resources have been encountered. The letter shall detail the anticipated time schedule for completion of the curation phase of the monitoring.

- Final Grading
  - The Project Paleontologist shall prepare a final report that documents the results, analysis, and conclusions of all phases of the Paleontological Monitoring Program if resources were encountered during grading. The report shall include the following:
    - If paleontological resources were discovered, the following tasks shall be completed by or under the supervision of the Project Paleontologist:
      - Prepare collected fossil remains for curation, to include cleaning the fossils by removing the enclosing rock material, stabilizing fragile specimens using glues and other hardeners, if necessary, and repairing broken specimens.
      - Curate, catalog and identify all fossil remains to the lowest taxon possible, inventory specimens, assigning catalog numbers, and enter the appropriate specimen and locality data into a collection database.
      - Submit a detailed report prepared by the Project Paleontologist in the format provided in Appendix D of the County of San Diego's Guidelines for Determining Significance for Paleontological Resources. The report shall identify which accredited institution has agreed to accept the curated fossils. Submit two hard copies of the final Paleontological Resources Mitigation Report to the Director of PDS for final approval of the mitigation and submit an electronic copy of the complete report in Microsoft Word on an USB drive. In addition, submit one copy of the report to the San Diego Natural History Museum and one copy to the institution that received the fossils.
      - Transfer the cataloged fossil remains and copies of relevant field notes, maps, stratigraphic sections, and photographs to an accredited institution (museum or university) in California that maintains paleontological collections for archival storage and/or display, and submit Proof of Transfer of Paleontological Resources, in the form of a letter, from the director of the paleontology department of the accredited institution to the Director of PDS verifying that the curated fossils from the project site have been received by the institution.
    - If no resources were discovered, a brief letter to that effect and stating that the grading monitoring activities have been completed, shall be sent to the Director of Planning and Land Use by the Project Paleontologist.

5(e) The GPU EIR concluded this impact to be less than significant with mitigation. Based on an analysis of records and the database from the South Coastal Information Center, it has been determined that the project is not likely disturb any human remains because the

project site does not include a formal cemetery or any archaeological resources that might contain interred human remains. In the unlikely event that human remains are encountered onsite during earth-disturbing activities, GPU EIR mitigation measure 2.5 (MM CUL-1) would ensure that state and federal laws and regulations regarding human remains (i.e., Public Resources Code §5097.98, CEQA Guidelines §15064.5 and Health & Safety Code §7050.5) are followed.

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.

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
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?	☐	☐	☐
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☐

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. GPU 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 GHGs. 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 result in the use of electricity, natural gas, petroleum, and other consumption of energy resources during both the construction and operation phases of the project; however, the consumption is not expected to be wasteful, inefficient, or unnecessary for the following reasons.

During construction, the project would require the use of heavy construction equipment that would be fueled by gas and diesel. However, the energy use would be temporary, limited, and cease upon completion of construction activities. Construction would be conducted in compliance with local, state, and federal regulations (e.g., United States Environmental Protection Agency [USEPA] and the CARB engine emission standards, which require highly efficient combustion systems that maximize fuel efficiency and reduce unnecessary fuel consumption, and limitations on engine idling times). Compliance with these regulations would minimize short-term energy demand during the project's grading to the extent feasible.

In addition, all new construction would be required to comply with the energy code in effect at the time of construction, which ensures efficient building construction. The project would also be required to comply with Title 24 energy standards for energy efficiency. Project design features that would result in lower energy use include enhanced energy efficiency, water-efficient landscaping and fixtures, solar photovoltaic (PV) provisions consistent with the requirements for residential land uses, electric vehicle (EV) charging in compliance with EV requirements in the most recently adopted version of the California Green Building Standards Code, Title 24, Part 11 (CALGreen), and diversion of construction waste in compliance with CALGreen Tier 2 standards. Additional measures, such as recycling and composting, would be employed by the project. Therefore, the construction and operation of the project is not expected to result in the wasteful or inefficient use of energy, and impacts would be less than significant.

The proposed project would use only the amount of energy necessary for the construction and operation of the proposed rural single-family residence that is typical of this type of development. The proposed project would be consistent with the General Plan land uses and SANDAG growth projections. Therefore, the project would not result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation.

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 proposed project includes the following energy conservation measures:

- Low-flow plumbing fixtures.
- Incorporation of Title 24 energy standards.
- Landscaping in compliance with the County's Water Conservation in Landscaping Ordinance.
- Construction and demolition recycling in compliance with County Ordinance Section 68.511 through 68.520 (Diversion of Construction and Demolition Materials from Landfill Disposal).
- Composting in compliance with the County's Strategic Plan to Reduce Waste (2017).
- High-efficiency LED street and area lighting.
- Solar PV provisions consistent with the requirements for single-family residential land uses.
- EV charging in compliance with EV requirements in the most recently adopted version of CALGreen.

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

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

Conclusion

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

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

7. Geology and Soils – Would the Project:	**Significant Project Impact**	**Impact not identified by GPU EIR**	**Substantial New Information**
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving: (i) rupture of a known earthquake fault, (ii) strong seismic ground shaking or seismic-related ground failure, (iii) liquefaction, and/or (iv) landslides?	☐	☐	☐
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☐
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?	☐	☐	☐
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?	☐	☐	☐
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?	☐	☐	☐

Discussion

An Update Report of Preliminary Geotechnical Investigation was prepared for the project by Geotechnical Exploration, Inc., dated September 24, 2024. The following responses have incorporated the analysis from the report.

7(a)(i) The GPU EIR concluded this impact to be less than significant. The project site is not located on or in proximity to any known active or potentially active fault traces. Other active fault zones in the region that could possibly affect the project site include the Newport-Inglewood-Rose Canyon Fault Zone System, Coronado Bank Fault, Elsinore Fault, San Diego Trough Fault Zone, San Clemente Fault Zone, and San Jacinto Fault. Due to the distance of these faults from the project site, project construction would not result in substantial adverse effects from ground surface rupture at any of these faults. Therefore, impacts would be less than significant.

7(a)(ii) The GPU EIR concluded this impact to be less than significant. The Update Report of Preliminary Geotechnical Investigation determined that risk of ground rupture and structural damage caused by seismically induced ground shaking are remote, although they could occur within the useful life of the proposed residence. To ensure the structural integrity of the proposed buildings, the project must conform to the Seismic Requirements as outlined within the California Building Code and the County Code. The County Code requires a soils compaction report with proposed foundation recommendations to be approved before the issuance of a building permit. The project grading also must conform to the grading requirements outlined in the County Grading Ordinance and be verified in the field by a licensed or registered Civil Engineer and inspected by County Grading Inspectors. Therefore, compliance with the Grading Plan, Geotechnical Investigation prepared by the registered Civil Engineer, Grading Ordinance, California Building Code, and the County Code would ensure the project would not result in a potentially significant

impact from the exposure of people or structures to potential adverse effects from strong seismic ground shaking.

7(a)(iii) The GPU EIR concluded this impact to be less than significant. Liquefaction typically occurs when a site is located in a zone with seismic activity, onsite soils are cohesionless (such as sand or gravel), groundwater is encountered within 50 feet of the surface, and soil relative densities are less than about 70 percent. The project site is not within a "Potential Liquefaction Area" as identified in the County Guidelines for Determining Significance for Geologic Hazards. This indicates that the liquefaction potential at the site is low. In addition, the site is not underlain by poor artificial fill or located within a floodplain. The Update Report of Preliminary Geotechnical Investigation determined that the risk of liquefaction at the project site does not exist due to the hard nature of the underlying bedrock materials and the lack of shallow static groundwater. Therefore, there would be a less than significant impact from the exposure of people or structures to adverse effects from a known area susceptible to ground failure, including liquefaction. In addition, since liquefaction potential at the site is low, earthquake-induced lateral spreading is not considered to be a seismic hazard at the site and impacts would be less than significant.

7(a)(iv) The GPU EIR concluded this impact to be less than significant. The Update Report of Preliminary Geotechnical Investigation determined that the project site is not located on a known or suspected recent or ancient landslide. The project site is not within a landslide susceptibility category as identified by the California Department of Conservation or in the County Guidelines for Determining Significance for Geologic Hazards. Landslide Susceptibility Areas were developed based on landslide risk profiles included in the San Diego County Multi-Jurisdictional Hazard Mitigation Plan (MJHMP) (URS 2004). Landslide risk areas from the MJHMP were based on data including steep slopes (greater than 25 percent); soil series data (SANDAG based on U.S. Geologic Survey [USGS] 1970s series); soil-slip susceptibility from USGS; and Landslide Hazard Zone Maps (limited to the western portion of the County) developed by the California Department of Conservation, Division of Mines and Geology (DMG). Also included within Landslide Susceptibility Areas are gabbroic soils on slopes steeper than 15 percent in grade because these soils are slide prone. As described in Section 7(a), the project must conform to the Seismic Requirements as outlined within the California Building Code and the County Code to ensure the structural integrity of the proposed buildings. The County Code requires a soils compaction report with proposed foundation recommendations to be approved before the issuance of a building permit. The project grading also must conform to the grading requirements outlined in the County Grading Ordinance and be verified in the field by a licensed or registered Civil Engineer and inspected by County Grading Inspectors. Therefore, compliance with the Grading Plan, Geotechnical Investigation prepared by the registered Civil Engineer, Grading Ordinance, California Building Code, and the County Code would ensure the project would not result in a potentially significant impact from the exposure of people or structures to potential adverse effects from landslides.

As previously discussed, the GPU EIR determined less than significant impacts from exposure to seismic-related hazards and soil stability. The proposed project would have a less than significant impact. Therefore, the project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

7(b) The GPU EIR concluded this impact to be less than significant. Construction of the project would include site grading, which has the potential to release sediment into downstream

receiving waters. However, the project would not result in substantial soil erosion or the loss of topsoil for the following reasons:

- The project would not result in unprotected erodible soils.
- The project is not located in a floodplain.
- A Drainage Report dated October 24, 2024 prepared by AP Consulting for the project illustrates the decreased peak flow rates at the project site when routes through a tree well and released at a controlled rate (see Section 10, Hydrology and Water Quality).
- The project would be required to comply with the County's Grading Ordinance [San Diego County Code of Regulations, Title 8, Zoning and Land Use Regulations, Division 7, Sections 87.414 (DRAINAGE - EROSION PREVENTION) and 87.417 (PLANTING)]. Compliance with these regulations would minimize the potential for water and wind erosion.

Due to these factors, it has been found that the project would not result in substantial soil erosion or the loss of topsoil, and impacts would be less than significant.

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. The Update Report of Preliminary Geotechnical Investigation determined that the project site is underlain by stable and dense bedrock material at shallow depths of 6 inches to 1.5 feet and therefore, slope stability is not an issue at the site. Grading associated with the project would be required to conform to the grading requirements outlined in the County Grading, Clearing, and Watercourses Ordinance (Grading Ordinance) and be verified in the field by a licensed or registered Civil Engineer and inspected by County Grading Inspectors. In addition, a Soils Engineering Report is required as part of the Building Permit process to assure that the proposed buildings are adequately supported. 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. Therefore, the Grading Plan prepared by the registered Civil Engineer and compliance with the Grading Ordinance ensure the project would not result in a potentially significant impact related to landslide, lateral spreading, subsidence, liquefaction, or collapse. Therefore, impacts would be less than significant. For further information regarding landslides, liquefaction, and lateral spreading, refer to Section 7(a)(iii) through (iv) listed above.

As previously discussed, the GPU EIR determined impacts from soil stability to be less than significant. As the proposed project would have a less-than-significant impact 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 Update Report of Preliminary Geotechnical Investigation determined that the topsoils and weathered formational soil are generally considered to have high to very high expansive potential. The more sandy bedrock materials are generally considered to have low

expansion potential. The unweathered bedrock materials at depth have very low expansion potential. As such, the Update Report of Preliminary Geotechnical Investigation concudes that the upper weathered bedrock is not considered suitable without regrading and blending due to its highly expansive nature, and removal and recompaction of existing topsoils and upper weathered bedrock across the proposed building pad area would be required to support the proposed structures and associated improvements. Therefore, compliance with all recommendations in the Update Report of Preliminary Geotechnical Investigation would ensure the project would not create a substantial risk to life or property, and impacts would be less than significant.

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

7(e) The GPU EIR concluded this impact to be less than significant. The project would rely on sewer service provided by the Olivenhain Municipal Water District and would not propose septic tanks or alternative wastewater disposal systems. As such, the project would not place septic tanks or alternative wastewater disposal systems on soils incapable of adequately supporting the tanks or system. As such, the project would not place septic tanks or alternative wastewater disposal systems on soils incapable of adequately supporting the tanks or system.

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

Conclusion

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

1. No peculiar impacts to the project or its site have been identified.

2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.

3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.

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

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

Discussion

A CAP Consistency Review Checklist was prepared for the project by Harris & Associates, dated April 21, 2025. The following responses have incorporated the analysis from the report.

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.

Per CEQA Guidelines Section 15064(h)(3), a project's incremental contribution to a cumulative impact can be found not cumulatively considerable if the project would comply with an approved plan or mitigation program that provides specific requirements that would avoid or substantially lessen the cumulative problem in the geographic area of the project. To qualify, such plans or programs must be specified in law or adopted by the public agency with jurisdiction over the affected resources through a public review process to implement, interpret, or make specific the law enforced or administered by the public agency. Examples of such programs include a "water quality control plan, air quality attainment or maintenance plan, integrated waste management plan, habitat conservation plan, natural community conservation plans [and] plans or regulations for the reduction of GHG emissions." Therefore, a lead agency can make a finding of "less than significant" for GHG emissions if a project complies with adopted programs, plans, policies, and/or other regulatory strategies to reduce GHG emissions.

The County of San Diego has developed a Climate Action Plan (CAP) to implement climate actions that reduce GHG emissions and establish actions to achieve a goal of net zero carbon emissions by 2045. The CAP establishes emission reduction targets of 43.6 percent emissions reductions below 2019 levels by 2030 and 85.4 percent below 2019 levels by 2045. This CAP sets GHG reduction targets and a net zero goal in alignment with the 2022 Scoping Plan. The CAP's attainment of the County's GHG reduction targets is the result of (1) several initiatives to be directly implemented by the County and (2) incorporating GHG-reduction features into the construction and operation of development projects (including County-initiated and privately-initiated projects).

The CAP Consistency Review Checklist establishes a two-step process that project proponents shall follow to determine if projects are consistent with the CAP and whether they may have a significant cumulative impact under the County's adopted GHG thresholds of significance.

Step 1 of the Checklist assesses a project's consistency with the growth projections used in the CAP to estimate future GHG emissions from activities occurring in the unincorporated area and County facilities and operations. Because the CAP uses growth projections based on implementation of the adopted General Plan, the first step in determining a project's consistency with the CAP is to demonstrate its consistency with the regional categories and land use designations of the General Plan. All projects must demonstrate consistency with existing General Plan regional categories, land use designations, and the uses and development density and intensity allowed under the Zoning Ordinance.

If a project is consistent with the General Plan, then Step 2 of the Checklist should be completed. If a project is not consistent with the regional categories or land use designations of the General Plan, then it shall not use the CAP Consistency Checklist for CEQA streamlining.

Step 2 of the Checklist sets forth CAP measures and actions in the form of "consistency requirements" that project proponents are required to incorporate into their projects to demonstrate compliance with the CAP. Project proponents are required to demonstrate project consistency with the CAP consistency requirements or demonstrate why the requirements are not applicable to their project.

Projects that are consistent with the CAP, as determined using Steps 1 and 2 in this Checklist, may rely on the CAP for the cumulative impacts analysis of GHG emissions under CEQA. Projects that are not consistent with the CAP as determined by Steps 1 or 2 of the Checklist, shall not use the CAP Consistency Checklist for CEQA streamlining.

As previously described, the proposed single-family residence would be consistent with the Rural Residential (RR) land use and zoning designations for the site. Therefore, the project may rely on the CAP for the cumulative impacts analysis of GHG emissions under CEQA.

As described in the CAP Consistency Review Checklist and required by County laws and regulations, the project would implement the following design features (included as conditions of approval by the County):

1. Low-flow plumbing fixtures, in compliance with CALGreen, which requires a 20 percent increase in indoor water use efficiency and use of indoor water-efficient irrigation systems.
2. Incorporation of Title 24 energy standards.
3. Comply with the County's Water Conservation in Landscaping Ordinance with automatically controlled efficient system and use of native plant species and non-invasive drought tolerant/low water use plants in landscaping plan.
4. Comply with County Ordinance Section 68.511 through 68.520 (Diversion of Construction and Demolition Materials from Landfill Disposal), which requires recycling of 90 percent of inert and 65 percent of all other materials from construction projects.
5. Comply with the County's Strategic Plan to Reduce Waste (2017) through the support of commercial composting programs to reduce organic waste and comply with established waste diversion requirements.
6. Comply with the County's Grading Ordinance and SDAPCD's fugitive dust rules outlined in Section 87.426 of the County's Grading Ordinance.
7. Utilize architectural coatings compliant with SDAPCD Rule 67.

8. Install high-efficiency LED street and area lighting to achieve reduction in overall lighting energy.
9. The project would not result in any wasteful, inefficient, or unnecessary energy usage (see Section VI above).
10. The proposed building structures would incorporate solar PV provisions consistent with the requirements for single-family residential land uses.
11. Achieve compliance with EV requirements in the most recently adopted version of CALGreen.

The measures above are also 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.

As previously discussed, the GPU EIR determined impacts to be less than significant with mitigation. As the project would have a less than significant impact 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 with implementation of GPU 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. 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 Rural Residential (RR). Through its goals, policies, and land use designations, the County's General Plan aims to reduce countywide GHG emissions. Therefore, the project would not conflict with SANDAG's recently adopted San Diego Forward: the 2021 Regional Plan, which includes a Sustainable Communities Strategy (SCS) as required by SB 375. Because the project's proposed land uses are consistent with the County's General Plan land use designation, the project would not conflict with the General Plan or SANDAG's Regional Plan and 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 proposed project would have a less than significant impact for the reasons detailed above, the project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

Conclusion

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

1. No peculiar impacts to the project or its site have been identified.

2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.

3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.

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

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
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?	☐	☐	☐
b) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☐
c) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, or is otherwise known to have been subject to a release of hazardous substances and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☐
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. Project construction would involve the transport of gasoline and other petroleum-based products associated with construction equipment. These materials are considered hazardous as they could cause temporary localized soil and water contamination. Incidents of spills or other localized contamination could occur during refueling, operation of machinery, undetected fluid leaks, or mechanical failure. However, all storage, handling, and disposal of these materials are regulated by the California Department of Toxic Substances Control, the USEPA, and the San Miguel Fire Protection District.

Typically, residential uses do not generate, store, dispose of, or transport large quantities of hazardous substances. Operation of the proposed development would include the storage and use of household hazardous materials and wastes. Typical household hazardous materials associated with the residential land uses could include cleaning products, paints, solvents, adhesives, other chemical materials used in building maintenance and interior improvements, automotive lubricants, small combustion engine fuels and lubricants, expired pharmaceuticals, mercury thermometers, sharp or used needles, and electronic wastes from household and car batteries. No special permits would be required for such limited use or disposal of common agents and products. Therefore, operation of the project would not expose on-site users or the surrounding community to any health hazards from hazardous materials.

All construction and operational activities involving the transportation, usage, and disposal of hazardous materials would be subject to all applicable federal, state, and local requirements, which would reduce impacts associated with the use and handling of hazardous materials during construction to less than significant. Therefore, the project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials, 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. The proposed project would have a less-than-significant impact for the reasons detailed above. Thus, the project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

9(b) The GPU EIR concluded this impact to be less than significant. The project is not located within 0.25 mile of an existing or proposed school. The closest school is Del Sur Elementary approximately 0.95 miles from the project site. The project does not propose any hazardous emissions or handling of hazardous or acutely hazardous materials or substances. Furthermore, the project is required to comply with applicable regulations pertaining to hazardous waste to ensure that impacts related to hazardous emissions and schools is less than significant.

As previously discussed, the GPU EIR determined impacts from hazards to schools to be less than significant. As the proposed project would have a less-than-significant impact

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

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

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

9(d) The GPU EIR concluded this impact to be less than significant with mitigation. The project is not located within an Airport Land Use Compatibility Plan (ALUCP), an Airport Influence Area, or a Federal Aviation Administration Height Notification Surface. The project is not located within 2 miles of an airport. Furthermore, the project does not propose construction of any structure equal to or greater than 150 feet in height that would constitute 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 proposed project would have a less-than-significant impact for the reasons detailed above, the project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

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

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

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

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

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

9f)(v) DAM EVACUATION PLAN:

The project is not located within a dam inundation zone. 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 proposed 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 State Responsibility Area (SRA) and within a Very High Fire Hazard Severity 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. Implementation of these fire safety standards would occur during the grading permit and/or building permit process. Therefore, based on the location of the project and review of the project by County staff, through compliance with the Consolidated Fire Code and through compliance with the San Diego County Fire Authority, the project is not anticipated to expose people or structures to a significant risk of loss, injury, or death involving hazardous wildland fires. Moreover, the project 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. However, the proposed project would have a less-than-significant impact with no required mitigation for the reasons detailed above. Therefore, the project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

9(h) The GPU EIR concluded this impact as less than significant. The project does not involve or support uses that 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. The proposed project would also have a less-than-significant impact. Therefore, the project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

Conclusion

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

1. No peculiar impacts to the project or its site have been identified.

2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.

3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.

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

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
10. Hydrology and Water Quality – Would the Project:			
a) Violate any waste discharge requirements?	☐	☐	☐
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?	☐	☐	☐
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?	☐	☐	☐
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)?	☐	☐	☐
e) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	☐	☐	☐
f) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	☐	☐	☐

g) Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems?	☐	☐	☐
h) Provide substantial additional sources of polluted runoff?	☐	☐	☐
i) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map, including County Floodplain Maps?	☐	☐	☐
j) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	☐	☐	☐
k) Expose people or structures to a significant risk of loss, injury or death involving flooding?	☐	☐	☐
l) Expose people or structures to a significant risk of loss, injury or death involving flooding as a result of the failure of a levee or dam?	☐	☐	☐
m) Inundation by seiche, tsunami, or mudflow?	☐	☐	☐

Discussion

A Drainage Report was prepared for the proposed project by AP Consulting, dated October 24, 2024. The following responses have incorporated the analysis from the report.

10(a) The GPU EIR concluded this impact to be significant and unavoidable. Development projects have the potential to generate pollutants during both the construction and operational phases. For the project to avoid potential violations of any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality, storm water management plans are prepared for both phases of the development project (construction and operation).

During the construction phase, the project would prepare and implement a SWPPP. The SWPPP would implement typical erosion control BMPs, such as hydraulic stabilization hydroseeding on disturbed slopes; use of mulch, straw, wood chips, and soil application on disturbed flat areas, energy dissipater outlet protection for water velocity control; fiber rolls, gravel and sand bags, storm drain inlet protection for sediment control; stabilized construction entrance 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 adopted by the State Water Resources Control Board (SWRCB) on September 2, 2009.

During the post-construction phase, as outlined in the Drainage Report and Grading Plan, the project would implement site design, and source control BMPs to prevent potential pollutants from entering storm water runoff 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 Construction General Permit and MS4 storm water permits listed above ensures the project would not create cumulatively considerable water quality impacts and addresses human health and water quality concerns. Therefore, the project would not contribute to a cumulatively considerable impact to water quality from waste discharges.

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

10(b) The GPU EIR concluded this impact to be significant and unavoidable. The project site lies in the Rancho Santa Fe (905.11) hydrologic sub-area within the San Dieguito hydrologic unit. According to the Clean Water Act section 303(d) list, the San Dieguito River is impaired for chloride, dissolved oxygen, phosphorus, total dissolved solids, toxicity, benthic community effects, nitrogen, pyrethroids, and bifenthrin. The project could contribute to release of these pollutants; however, the project would comply with the WPO and implement site design measures and source control BMPs to prevent a significant increase of pollutants to receiving waters.

As previously discussed, the GPU EIR determined significant and unavoidable impacts to water quality standards and requirements. However, the project would have a less-than-significant impact to water quality standards with the implementation of project conditions listed in Section 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 Sections 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 proposed project would have a less-than significant impact to water quality standards and groundwater supplies and recharge with the implementation of project conditions listed in Section 10(a), which are 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(d) The GPU EIR concluded this impact to be significant and unavoidable. The project is within the service area of the Olivenhain Municipal Water District that obtains water from surface reservoirs and other imported sources. The project would not use groundwater for its potable water supply. The project would increase demand for potable water and non-potable water for irrigation. Given that Water Management Plans use projections in local planning documents and that the project is consistent with the County General Plan land use designation and zoning, potable water demands of the project (that would include groundwater) would be similar to those accounted for in Olivenhain Municipal Water District's 2020 Urban Water Management Plan and 2020 Water Shortage Contingency Plan. Consequently, significant impacts to groundwater resources are not anticipated with

development of the project. In addition, the project does not involve operations that would interfere substantially with groundwater recharge. In addition, the project does not involve operations that would interfere substantially with groundwater recharge.

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

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 prepare and implement a SWPPP. The SWPPP would implement typical erosion control BMPs, such as hydraulic stabilization hydroseeding on disturbed slopes; mulch, straw, wood chips, and soil application on disturbed flat areas, energy dissipater outlet protection for water velocity control; fiber rolls, gravel and sand bags, storm drain inlet protection for sediment control; stabilized construction entrance for offsite tracking of sediment; and measures to control materials management and waste management.

Preconstruction the drainage pattern is generally to the north/northeast. The drainage through the property exits the site at the northern/northeastern property lines in a sheet flow condition and to a drainage along the eastern boundary of the project site that flows south to north. Post construction drainage would maintain the same drainage patterns as the pre-developed condition. The increase in flow rate for the post developed condition would be mitigated by the use of a tree well facility with 13 trees and a biofiltration wall with an outlet structure that would release water at a controlled rate. The tree well facility and biofiltration wall would adequately mitigate the increase in stormwater flow from the development. Additionally, graded areas on-site would be landscaped to reduce or eliminate sediment discharge.

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 June 1, 2020, the project would implement site design and source control BMPs to prevent potential pollutants from entering storm water runoff. The SWQMP would be prepared in accordance with the County of San Diego BMP Design Manual (2019) and SDRWQCB Order No. R9-2013-0001 Municipal Separate Storm Sewer System (MS4) permit (2013), as adopted by the RWQCB on May 8, 2013.

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

As previously discussed, the GPU EIR determined significant and unavoidable impacts to erosion or siltation. However, the proposed project would have a less-than-significant impact to erosion or siltation with 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 Drainage Report determined that the proposed project would not alter the existing drainage pattern in a manner which would result in flooding on- or off-site. See Section 10(e) for further discussion on on-site drainage patterns.

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

10(g) The GPU EIR concluded this impact to be less than significant with mitigation. Pursuant to the Drainage Report prepared for the project, and as described above in Section 10(e) and 10(f), the proposed project would generally maintain the existing pre-development on-site drainage pattern. Post development drainage would be at or below pre-development rates of discharge with implementation of design features and improvements consistent with GPU mitigation measures (Hyd-1.2 through Hyd-1.5).

As previously discussed, the GPU EIR determined impacts to exceed capacity of stormwater systems as less than significant with mitigation. The proposed project would have a less-than-significant impact with regards to exceeding the capacity of stormwater systems with 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(h) The GPU EIR concluded this impact to be significant and unavoidable. The project has the potential to generate pollutants; however, site design measures and source control BMPs as indicated in Section 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 proposed project would have a less-than-significant impact to water quality standards with the implementation of project conditions listed in Section 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 Federal Emergency Management Agency (FEMA) or County-mapped floodplains were identified on the project site. Therefore, the project would not place housing within a County or federal floodplain or flood way.

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

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

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

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

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

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

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

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

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

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

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

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

1. No peculiar impacts to the project or its site have been identified.

2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.

3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.

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

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
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 proposes the development of a single-family residence on a vacant lot that is surrounded by similar single-family residences. No component of the project would introduce a barrier or division to, or otherwise result in a conflict with, the surrounding residential development or other established community. Because the project would occur within existing parcel boundaries, the proposed project would not significantly disrupt or divide the established community.

As previously discussed, the GPU EIR concluded physically dividing an established community as less than significant with mitigation. However, the proposed project would have no 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 development of a single-family residence on a vacant lot that is surrounded by similar single-family residences, which is consistent with the Rural Residential (RR) land use and zoning designations for the project site. Surrounding land uses consist of similar rural single-family residences to the west, south, and east, and other large single-family homes

to the north. The project does not conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, impacts would be less than significant.

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

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

1. No peculiar impacts to the project or its site have been identified.

2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.

3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.

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

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

12(a) The GPU EIR determined that impacts to mineral resources would be significant and unavoidable. The project site is not classified by the California Department of Conservation – Division of Mines and Geology as an area of "Potential Mineral Resource Significance." The project site is surrounded by developed residential land uses which would be incompatible with future extraction of mineral resources on the project site. A future mining operation at the project site would create a significant impact to neighboring properties for issues such as noise, air quality, traffic, and possibly other impacts. Additionally, the project site is less than 3 acres in size. 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 extraction would not occur at the site due to incompatible land uses.

As previously discussed, the GPU EIR determined impacts to mineral resources to be significant and unavoidable. As the proposed project would have a less-than-significant impact for the reasons detailed above, the project would be consistent with the analysis

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

12(b) The GPU EIR concluded this impact to be significant and unavoidable. The project site is not located in a Mineral Resource Zone, nor is it located within 1,300 feet of such lands. Therefore, the project would not result in the loss of availability of locally important mineral resource(s). Therefore, no potentially significant loss of availability of a 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.

13. Noise – Would the Project:	**Significant Project Impact**	**Impact not identified by GPU EIR**	**Substantial New Information**
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☐
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	☐
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	☐
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐
f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐

Discussion

13(a) The GPU EIR concluded this impact to be less than significant with mitigation. The area surrounding the project site consists of single-family residences and accessory structures. 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). Projects which could produce noise in excess of 60 dB(A) are required to incorporate design measures or mitigation as necessary to comply with the Noise Element. A single-family home development would likely be exposed to and generate occasional nuisance noise (i.e., intermittent or temporary neighborhood noise from sources such as amplified music, barking dogs, and landscape maintenance equipment that may be disturbing to other residents). Section 36.404 of the County Municipal Code contains the noise control standards for the county and prohibits nuisance noise from exceeding the noise standards at any time. Compliance with the County Municipal Code would limit exposure to excessive nuisance noise. Additionally, nuisance noises would be different from each other in kind, duration, and location. Therefore, the overall effects would be separate and, in most cases, would not affect the receptors at the same time. Therefore, 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 and surrounding area are zoned Rural Residential that has a one-hour average sound limit of 50 dBA daytime and 45 dBA nighttime. Project operation does not involve any noise producing equipment that would exceed applicable noise levels at the adjoining property line.

Noise Ordinance – Section 36-410: Temporary construction noise is subject to the County's 75 dBA eight-hour average requirement at the boundary of any occupied property, specifically an existing residence. It is not anticipated that the project would operate construction equipment in excess of an average sound level of 75 dB between the hours of 7 AM and 7 PM. The project would not generate construction noise in excess of Noise Ordinance standards. Construction operations would occur only during permitted hours of operation. In addition, the following BMPs would be adhered to whenever possible:

- Turn off equipment when not in use.
- Equipment used in construction should be maintained in proper operating condition, and all loads should be properly secured, to prevent rattling and banging.
- Use equipment with effective mufflers.
- Minimize the use of backup alarms.
- Equipment staging areas should be placed at locations away from noise-sensitive
    - (occupied) receivers.

As previously discussed, the GPU EIR determined impacts from excessive noise levels to be less than significant with mitigation. The project would have a less-than-significant impact with the incorporation of BMPs. 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(b) The GPU EIR concluded this impact to be less than significant with mitigation. The project proposes a single-family residential use, which is sensitive to low ambient vibration. The project does not propose any blasting or rock crushing during the grading operations. In addition, project operation does not involve any vibration producing equipment that would exceed applicable vibration levels at the adjoining property line.

As previously discussed, the GPU EIR determined impacts from excessive groundborne vibration to be less than significant with mitigation. However, the project would have a less than significant impact with no required mitigation for the reasons detailed above. Therefore, the project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

13(c) As indicated in the response listed under Section 13(a), the project is a single-family residence and would not expose existing or planned noise sensitive areas in the vicinity to a substantial permanent increase in noise levels that exceed the allowable limits of any applicable noise standards. Also, the project is not expected to expose existing or planned noise sensitive areas to noise levels 10 dB CNEL over existing ambient noise levels.

As previously discussed, the GPU EIR determined impacts from permanent increase in ambient noise levels to be significant and unavoidable. However, the project would have a less-than-significant impact with no required mitigation for the reasons detailed above. Therefore, the project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

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. Temporary construction noise was assessed and would be subject to the County 75 dBA eight-hour average requirement at the boundary of any occupied property, specifically an existing residence.

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

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

Conclusion

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

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

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
14. Population and Housing – Would the Project:			
a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☐
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	☐	☐	☐

Discussion

14(a) The GPU EIR concluded this impact to be less than significant. The project proposes development of a single-family residence on a vacant lot that is surrounded by similar single-family residences. The residents of the home would not increase population growth. The proposed project is consistent with the existing land use and zoning designations for the site. Therefore, implementation of the proposed project would not directly or indirectly induce substantial unplanned population growth, and impacts would be less than significant.

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

14(b) The GPU EIR concluded this impact to be less than significant. The proposed project would not demolish any structures. Therefore, the project would not displace existing people or housing, and impacts would be less than significant.

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

14(c) The GPU EIR concluded this impact to be less than significant. The project would not displace a substantial number of people. The project would develop a vacant site with a single-family residence. As such, replacement housing would not be required elsewhere.

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

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

1. No peculiar impacts to the project or its site have been identified.

2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.

3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.

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

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

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 includes development of a single-family residence on a vacant lot that is surrounded by similar single-family residences. The project would not result in the need for significantly altered public services or facilities including, but not limited to, fire protection facilities, sheriff facilities, schools, or parks in order to maintain acceptable service ratios, response times, or other performance service ratios or objectives for any public services. The single-family residence would not result in increased demand for existing neighborhood and regional parks or other recreational facilities. Additionally, the proposed project would include extensive landscaping, various patio areas, and walkways throughout the site. Therefore, the project would not result in the need for new or physically altered governmental facilities, the construction of which would cause a significant impact on the

environment. Impacts would be less than significant. The Project's effect on public parks is discussed in response 16(a) and response 16(b).

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

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

1. No peculiar impacts to the project or its site have been identified.

2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.

3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.

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

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

Discussion
16(a) The GPU EIR concluded this impact to be less than significant with mitigation. The project includes development of a single-family residence on a vacant lot that is surrounded by similar single-family residences, which is consistent with the existing land use and zoning designations for the site. Surrounding land uses consist of similar rural single-family residences to the west, south, and east and other large single-family residences to the north. The proposed single-family residence would not 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. Additionally, the proposed project would include extensive landscaping, various patio areas, and walkways throughout the site. Impacts would be less than significant.

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

16(b) The GPU EIR concluded this impact to be less than significant with mitigation. The project does not include recreational facilities or require the construction or expansion of recreational facilities. Therefore, the project would have no 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 proposed project would have no impact for the reasons detailed above, the project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

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

1. No peculiar impacts to the project or its site have been identified.

2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.

3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.

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

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

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

17(a) The GPU EIR concluded this impact to be significant and unavoidable. The GPU included the adoption of new General Plan Elements, including the Mobility Element (ME), which set the goals and policies that guide future development. One policy goal of the GPU ME is to require development projects to provide associated road improvements necessary to achieve a level of service of “D” or higher on all ME roads except for those where a failing level of service has been accepted by the County.

As part of the GPU EIR, a County Traffic and Circulation Assessment Report was conducted to evaluate forecast roadway network operations to identify and forecast operational deficiencies along State highways and County ME roadways with associated mitigation requirements assuming buildout of the various land use alternatives in the GPU.

Guidelines were also established for Determining Significance for Transportation and Traffic (Traffic Guidelines) pursuant to CEQA for evaluating adverse environmental effects that a proposed project may have on transportation and traffic consistent with the GPU. A project would demonstrate this through a traffic study using level of service (LOS) and application of General Plan elements, which set the goals and policies that would show whether the projects impacts are covered by the GPU EIR.

Projects consistent with the GPU EIR analysis, policies, goals, and guidelines for evaluating adverse environmental impacts for transportation and traffic will not be subject to Senate Bill 743 and Vehicle Miles Traveled (VMT).

The project consists of a grading plan for one single-family residence. Based on SANDAG's (Not So) Brief Guide of Vehicular Traffic Generation Rates for the San Diego Region, the project will generate no more than 10 Average Daily Trips (ADT). Section 2.1.1 in the County’s Traffic Guidelines state that projects that generate less than 200 ADT will not result in direct traffic impacts, due to the minimal trips distributed to the roadways and intersections in proximity to the project site. These trips will not meet the minimum thresholds to require analysis or trigger a significant impact.

As previously discussed, the GPU EIR determined significant and unavoidable impacts to unincorporated County traffic and LOS standards. The project would be consistent with applicable General Plan Mobility Element Policies such as M-2.1, County standards, and mitigation measures and the analysis evaluated within the GPU EIR. The measures were

identified in the GPU EIR as Tra-1.7 and Tra-6.9 which require payment into the County TIF program. Therefore, the project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

17(b) The GPU EIR concluded this impact to be significant and unavoidable. The designated congestion management agency for the County is 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.

Since the GPU EIR concluded this impact to be significant and unavoidable, the project would not conflict with an applicable congestion management program, the project would be consistent with the analysis in the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance other than the information identified in 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, Aviation Easement, or Overflight Area. Therefore, the project would have a less than significant impact to air traffic patterns. The project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

17(d) The GPU EIR concluded this impact to be significant and unavoidable. The proposed project would not substantially alter traffic patterns, roadway design, place incompatible uses (e.g., farm equipment) on existing roadways, or create curves, slopes or walls which would impede adequate sight distance on a road. The private driveway onto Caminito Del Vienticito/Artesian Breeze Way would meet County design standards with improved sight lines.

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

17(e) The GPU EIR concluded this impact to be less than significant with mitigation. The proposed project would not result in inadequate emergency access. The project is not served by a dead-end road that exceeds the maximum cumulative length permitted by the San Diego County Consolidated Fire Code. The proposed driveway would be constructed to a minimum of 16-feet in width and would meet County Fire Code Standard 503.2.6. In addition, consistent with GPU EIR mitigation measure Tra-4.2, the project would implement the Building and Fire codes to ensure emergency vehicle accessibility.

As previously discussed, the GPU EIR determined impacts on emergency access as less than significant with mitigation. As the project would have a less-than-significant impact 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. 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, bicycle, or pedestrian facilities.

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

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

1. No peculiar impacts to the project or its site have been identified.

2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.

3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.

4. Feasible mitigation measures contained within the GPU EIR would be applied to the project. The mitigation measures, as detailed above, would require the project applicant to comply with the County Public Road Standards, Guidelines for Determining Significance, coordinate with other jurisdictions to identify appropriate mitigation and implement the Building and Fire Codes to ensure adequate services are in place.

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
18. Utilities and Service Systems – Would the Project:			
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	☐	☐	☐
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?	☐	☐	☐
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☐
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	☐	☐	☐

e) Result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☐
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	☐	☐	☐
g) Comply with federal, state, and local statutes and regulations related to solid waste?	☐	☐	☐

Discussion

18(a) The GPU EIR concluded this impact to be less than significant with mitigation. The project includes development of a single-family residence on a vacant lot that is surrounded by similar single-family residences, which is consistent with the Rural Residential (RR) land use and zoning designations for the project site. The project is located within the Olivenhain Municipal Water District boundaries. The project does not propose to discharge domestic waste to on-site wastewater systems (OSWS), also known as septic systems. Therefore, the project would be consistent with the wastewater treatment requirements of the RWQCB.

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

18(b) The GPU EIR concluded this impact to be less than significant with mitigation. The project includes development of a single-family residence on a vacant lot that is surrounded by similar single-family residences, which is consistent with the Rural Residential (RR) land use and zoning designations for the project site. The project site and existing surrounding residences are served by Olivenhain Municipal Water District. 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.

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

18(c) The GPU EIR concluded this impact to be less than significant with mitigation. The project involves new storm water drainage facilities; however, these extensions would not result in additional adverse physical effects beyond those already identified in other sections of this environmental analysis.

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

18(d) The GPU EIR concluded this impact to be significant and unavoidable. The project would receive water from the Olivenhain Municipal Water District, which has adequate water to serve the single-family residence. For instance, the project includes development of a single-family residence that is surrounded by similar single-family residences, which is consistent with the Rural Residential (RR) land use and zoning designations for the project site and therefore, was planned for in Olivenhain Municipal Water District's growth projections. The single-family residence would result in negligible long-term operational water demand. As the proposed project would have a less-than-significant impact, the project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

18(e) The GPU EIR concluded this impact to be less than significant with mitigation. The project would require wastewater services from the Olivenhain Municipal Water District, which has adequate services available to serve the single-family residence. Therefore, the project would not interfere with any wastewater treatment provider's service capacity.

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

18(f) The GPU EIR concluded this impact to be significant and unavoidable. The project includes development of a single-family residence that is surrounded by similar single-family residences, which is consistent with the Rural Residential (RR) land use and zoning designations for the project site and therefore, was planned for in the County's growth projections. The single-family residence would result in negligible long-term operational solid waste generation. 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.

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

19(a) The GPU EIR concluded this impact to be significant and unavoidable. The site is located within SRA. The project site is within the authority of the Rancho Santa Fe Fire Protection District and CAL FIRE and is located approximately 2.6 miles from the nearest fire station, which is located at 16930 Four Gee Road. The expected emergency travel time to the proposed Project would be 6 minutes. Access would be provided by the proposed private driveway along Caminito Del Vientecito/Artesian Breeze Way.

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

19(b) The GPU EIR concluded this impact to be significant and unavoidable. The project is within a Very High Fire Hazard Severity Zone. The project would comply with regulations

relating to emergency access, water supply, and defensible space specified in the County Fire Code and Consolidated Fire Code. Implementation of these fire safety standards would occur during the building permit process and is consistent with GPU EIR mitigation measures Haz-4.2 and Haz-4.3. In addition, the project is consistent with the Zoning Ordinance and the allowable development density established under the GPU. Therefore, for the reasons stated above, the project would not be expected to experience exacerbated wildfire risks due to slope, prevailing, winds or other factors.

As previously stated, Wildfire was analyzed within the GPU EIR within Section 2.7, Hazards and Hazardous Materials and was determined to be significant and unavoidable. However, the proposed project would have a less-than-significant impact with the implementation of GPU EIR mitigation measures Haz-4.2 and Haz-4.3 for the implementation of brush management and 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 would require the installation and maintenance of a new private driveway, sports court, pool, and landscaped areas. The project also requires utility connections for service from the Olivenhain Municipal Water District. These proposed improvements would not exacerbate fire risk. All infrastructure associated with the project has been incorporated within this analysis. Therefore, no additional temporary or ongoing impacts to the environment related to associated infrastructure would occur that have not been analyzed in other sections of this environmental document.

As previously discussed, the GPU EIR determined impacts from Wildfire to be significant and unavoidable. However, the project would have a less-than-significant impact for the reasons detailed above. Therefore, the project would be consistent with the analysis 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 Section 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 Update Report of Preliminary Geotechnical Investigation determined that the project site is not located on a known or suspected recent or ancient landslide. The project site is not within a landslide susceptibility category as identified by the California Department of Conservation or in the County Guidelines for Determining Significance for Geologic Hazards. 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. Therefore, for the reasons stated above, the project site would not expose people or structures to significant risk, including downslopes or downstream flooding or landslides, as a result of runoff, post-fire instability, or drainage changes.

The GPU EIR concluded significant and unavoidable impacts associated with Wildfire under Section 2.7, Hazards and Hazardous Materials. However, the proposed project would have a less-than-significant impact with for the reasons detailed above. Therefore,

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

Conclusion

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

1. No peculiar impacts to the project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. Feasible mitigation measures contained within the GPU EIR (Haz-4.2 and Haz-4.3) would be applied to the project. These mitigation measures, as detailed above, require the project applicant to implement brush management and comply with the building and fire codes.

Appendices

Appendix A – Technical Studies and References

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

Appendix A

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

CalEEMod Results. Harris & Associates. April 21, 2025.

Biological Resources Letter Report. Klutz Biological Consulting. May 28, 2025.

Update Report of Preliminary Geotechnical Investigation. Geotechnical Exploration, Inc. September 24, 2024.

CAP Consistency Review Checklist. Harris & Associates. April 21, 2025.

Drainage Report. AP Consulting. October 24, 2024.

References

For a complete list of technical studies, references, and significance guidelines used to support the analysis of the GPU 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

California Air Resources Board. 2022a. California's 2022 Scoping Plan for Achieving Carbon Neutrality. Available: https://ww2.arb.ca.gov/sites/default/files/2023-04/2022-sp.pdf.

Office of Environmental Health Hazard Assessment (OEHHA). 2015. Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments. Available at: https://oehha.ca.gov/air/crnr/notice-adoption-air-toxics-hot-spots-program-guidance-manual-preparation-health-risk-0.

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