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March 26, 2026

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

Project Name: South Storage Village Project

Project Record Numbers: PDS2023-STP-23-023; PDS2024-LDGRMJ-30505

APN(s): 186-230-88-00 & 186-230-89-00

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:

Souphalak Sakdarak, Environmental Planner
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Project Location:

The South Storage Village Project (project) is located on approximately 4.3 acres at 28010 Valley Center Road in the unincorporated community of Valley Center within the County of San Diego (Assessor's Parcel Numbers 186-230-88-00 & 186-230-89-00 (formerly 186-230-16-00, 186-230-84-00 and 186-230-22-00)).

Project Applicant Name and Address:

Dave Bohorquez
P.O. Box 366
Valley Center, California 92082

General Plan

Community Plan:	Valley Center
Regional Categories:	-
Land Use Designations:	Rural Commercial (C40)
Density:	-
Floor Area Ratio (FAR):	-

Zoning

Use Regulation: Rural Commercial (C40)
 Minimum Lot Size: 2 acres
 Special Area Regulation: B

Description of Project:

The proposed project includes site grading and construction of eight storage facility buildings totaling 69,742 square feet (sf) with associated internal roads, landscaping, and stormwater drainage, including an infiltration basin, on an approximately 4.3-acre project site. Construction of the project would include site grading and excavation for foundations and utilities, building construction, paving, and architectural coating (Figure 3, Site Plan and Figure 4, Grading Plan). The project would require approximately 12,115 cubic yards (cy) of cut, 29,050 cy of fill, 4,113 cy of undercuts, and 12,822 cy of import. Project construction is anticipated to occur over a period of approximately 13 months.

Table 1 Proposed Building Square Footage	
Building	Square Footage
A	9,929
B	9,642
C	6,223
D	6,200
E	6,550
F	24,898
G	3,150
H	3,150
Total	69,742

The project would be served by Valley Center Municipal Water District for sewer and water. Fire service would be provided by the Valley Center 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 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.sdcountry.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 locally-serving commercial storage facility on land developed with a single-family residence and storage site, which is consistent with the Rural Commercial (C40) land use and zoning designations and development density established by the GPU and the certified GPU EIR. The project site is surrounded by rural residences, commercial uses, and public facilities.
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 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 would not result in any potentially significant impacts.

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.

_____ Signature	_____ Date
Souphalak Sakdarak Printed Name	_____ Environmental Planner 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion

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

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

As described in the General Plan Update (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 site is located within the Lancaster Mountain – Keys Canyon – Lilac Creek RCA identified in the Valley Center Community Plan. According to the Community Plan, this long, narrow area is mainly important for the riparian and oak woodland habitats that exist in the stream bottom. The project includes development of a 69,742-sf commercial storage facility comprised of eight buildings with associated internal roads, landscaping, and stormwater drainage, including an infiltration basin, on an approximately 4.3-acre project site. The project would replace existing development on-site including one single-family residence and a storage site. Additionally, the project site is located more than 2,600 feet from Keys Creek to the north and more than 1,000 feet from Moosa Canyon Creek to the south. Due to distance and intervening roads, structures, and topography, no impacts would occur to these RCAs. Additionally, given that the proposed

project would be consistent with the land use and zoning designations as well as other commercial uses in the project vicinity, the proposed project would not substantially degrade a scenic vista. Therefore, the project would have a less than significant effect on a scenic vista.

Additionally, the site is subject to the “B” Designator Community Design Review Area Regulations, which typically require preparation and review of a Site Plan to ensure consistency with the Valley Center Design Guidelines. However, the project received a Site Plan Exemption. The “B” Designator is intended to maintain and enhance the character and identity of County communities, and the Valley Center Design Guidelines address architectural character, landscaping, parking design, signage, and lighting. Under Sections 5750 through 5799 of the County Zoning Ordinance, projects within a “B” Designator area would normally require a Site Plan reviewed by County staff and the local Design Review Board for conformance with these guidelines. Although a Site Plan Exemption was approved for the project, County staff and the local Design Review Board reviewed the project as part of the exemption process to ensure consistency with the Design Guidelines. This review ensures that the proposed project would not substantially degrade 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 would not damage or remove visual resources within a State scenic highway. The nearest eligible State scenic highway is State Route 76, which is located more than 6 miles to the north. The nearest designated State scenic highway is a portion of State Route 52 located more than 25 miles southeast of the project site. Additionally, a portion of Lilac Road and Valley Center Road are identified in the County’s Conservation and Open Space Element of the General Plan as a Scenic Corridor; however, while the project site is less than 1,000 feet from the intersection of Lilac Road and Valley Center Road, the site is not visible from the portions of these roads identified as a Scenic Corridor. Due to distance, topography, and intervening structures, the project site is not visible from the State scenic highways or County Scenic Corridor. As such, the project site is not visible within the composite viewshed of a State scenic highway or County Scenic Corridor and would 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 and commercial area. The project site is surrounded by open space to the north, rural single-family residences to the west, south, and east, and other commercial uses to the south (e.g., dentist office, performing arts theatre, Valley Center Muffler & Auto Repair Shop, Plants of Joy Nursery, Southwest Feed, and MNM Automotive) and southeast (e.g., Fat Ivor's Rib Rack, Midtown Hair Studio, Powerland Equipment Inc.). The project includes the development of a 69,742-sf commercial storage facility comprised of eight buildings on an approximately 4.3-acre project site, which is consistent with the Rural Commercial land use and zoning designations for the project site. Public views of the project site are limited to Valley Center Road, Old Road, and other surrounding streets (e.g., Calle de Vista). The project would be consistent with the surrounding rural residential and commercial 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.

Further, as described above, the project received a Site Plan Exemption, which demonstrates that the project complies with the Design Guidelines required for review and approval by County staff and the local Design Review Board under the site's "B" Designator. Conformance with the Design Guidelines and the review conducted as part of the exemption process ensure that the proposed project would not substantially degrade the visual character or quality of the project site or its surroundings.

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 A as identified by the San Diego County Light Pollution Code, which is any area of the unincorporated County that is 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 A lamp type and shielding requirements per fixture and hours of operation limitations for outdoor lighting and searchlights. The code was developed by the County in cooperation with the lighting engineers, astronomers, and other experts to effectively address and minimize the impact of new sources 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
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2. Agriculture/Forestry Resources

– Would the Project:

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

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

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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c) Conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland zoned Timberland Production?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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d) Result in the loss of forest land, conversion of forest land to non-forest use, or involve other changes in the existing environment, which, due to their location or nature, could result in conversion of forest land to non-forest use?

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

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

- 2(a) The GPU EIR concluded this impact to be significant and unavoidable. Based on the County of San Diego Geographical Information System (GIS) and aerial imagery, the project site does not contain any agricultural resources. Additionally, according to the California Department of Conservation (DOC) California Important Farmland Finder, the project site is not located on 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)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Create objectionable odors affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion

Air quality and greenhouse gas (GHG) modeling was prepared for the project by Harris & Associates, dated July 28, 2025. The following responses have incorporated the results from the modeling.

- 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 construct a storage facility on 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 NO_x 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.
^aBased 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.
^bThreshold for VOCs based on the threshold of significance for VOCs from the South Coast Air Quality Management District for the Coachella Valley.
^c13.7 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 (PM₁₀), 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 demolition of a single-family residence to develop a new 69,742-sf commercial storage facility comprised of eight buildings with associated internal roads, landscaping, and an infiltration basin on an approximately 4.3-acre project site. Project construction is estimated to take approximately 13 months. On-site construction emissions are attributed to emissions occurring within the project area, such as the activity of construction equipment. Off-site construction 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 12,115 cy of cut, 29,050 cy of fill, 4,113 cy of undercuts, and 12,822 cy 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 commercial storage facility development are not anticipated to exceed the County’s construction SLTs, based on the results of the CalEEMod report.

Table 3 Estimated Maximum Daily Project Construction Emissions						
Emissions	Pollutant					
	VOCs	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Max. Daily (lb/day)	20.1	41.8	34.6	0.12	23.3	12.1
Screening Level Threshold	75	250	550	250	100	55
Exceeds Threshold?	No	No	No	No	No	No
SOURCE: CalEEMod; SDAPCD, Rules 20.1, 20.2, 20.3; County of San Diego 2007.						

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.

Table 4 Estimated Maximum Daily Project Operational Emissions						
Emissions	Pollutant					
	VOCs	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Max. Daily (lb/day)	2.68	0.84	8.77	0.02	1.28	0.35
Screening Level Threshold	75	250	550	250	100	55
Exceeds Threshold?	No	No	No	No	No	No
SOURCE: CalEEMod; SDAPCD, Rules 20.1, 20.2, 20.3; County of San Diego 2007.						

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 O₃. San Diego County is also presently in non-attainment for PM₁₀ and PM_{2.5} under the CAAQS. O₃ 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 PM₁₀ 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 PM₁₀, 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 PM₁₀, 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 PM₁₀. However, the project's estimated emissions of criteria air pollutants, specifically PM₁₀, was estimated to be 23.3 lb/day, which would be well below the County's SLT of 100 lb/day for PM₁₀ 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 PM₁₀ 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 100 feet to the south and west and 250 feet to the east. 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) in 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. Daily trips would be limited due to the relatively small scope of the project. For instance, CalEEMod conservatively estimates a daily trip rate of 121 vehicle trips per day. 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 2017).

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 13 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 substantial trips from large or heavy-duty vehicles that could generate mobile diesel emissions due to the local-serving nature of the proposed use.

Additionally, the proposed commercial storage 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 commercial

storage facility is not typically associated with objectionable odors. 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
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4. Biological Resources – Would the Project:

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

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

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

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

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

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



Discussion

A Biological Resources Memo was prepared for the proposed project by Klutz Biological Consulting dated June 20, 2024. The Biological Resources Memo consists of a literature review and results of a field reconnaissance survey conducted on February 24th, 2024. 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 Memo, no candidate, sensitive, or special status plant or wildlife species were detected during the field survey, and none are considered to have high potential or likely to occur on-site. Furthermore, the project site does not support suitable California gnatcatcher habitat and does not appear to have supported suitable California gnatcatcher in the past. The project would not impact special status species and thus, would not contribute to a cumulative impact for such species.

As previously discussed, the GPU EIR determined impacts to special status species as significant and unavoidable. However, the project would not result in impacts to special status species. Therefore, the project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

4(b) The GPU EIR concluded this impact to be significant and unavoidable. Based on the general survey of the site, four land cover types occur including: coast live oak woodland, non-native grassland, eucalyptus woodland, and urban/developed lands.

Coast Live Oak Woodland – On-site, this habitat consists primarily of isolated coast live oak (*Quercus agrifolia*) trees that are not part of a larger woodland complex. Coast Live Oak Woodland is also associated with the ephemeral drainage that occurs off-site along the northern property boundary.

Non-native grassland – A small portion of non-native grassland was mapped along the northern boundary of the project site. This area extends north of the property boundary into a larger field, comprised primarily of non-native grasses and open Coast Live Oak Woodland.

Eucalyptus Woodland – A grove of mature eucalyptus trees occur in the northwestern portion of the property. This woodland is dense and could support nesting raptor species. The woodland is both on-site and off-site extending north of the project boundary.

Urban/Developed Lands comprise the majority of the site. Urban/Developed lands on-site include an existing gas station, parking lots, a single-family residence, storage yards, driveways and paved roads. All of the areas mapped as developed lands are routinely maintained and contain ornamental vegetation. Some of the ornamental vegetation is comprised of native plant species,

including coast live oak trees and other native plants primarily associated with the Valley Center Road landscape plan.

As previously discussed, the GPU EIR determined that impacts to riparian habitat and other sensitive natural communities would be significant and unavoidable. The project site is primarily developed, containing an existing residence, gas station, parking areas, and storage facility yards. Because the project would not introduce new impacts beyond those already identified in the GPU EIR, it is consistent with that analysis.

- 4(c) The GPU EIR concluded this impact to be less than significant with mitigation. The Biological Resources Memo 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. When widening Valley Center Road in 2007 to 2009, a culvert was installed that appears to have created a wetland that would likely be regulated by the County's Resource Protection Ordinance and the Resource Agencies. 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 Memo determined that the project site does not contain habitat that supports the movement of fish or wildlife species or native wildlife nursery sites. 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 is located within the draft North County Multiple Species Conservation Program (MSCP) and outside of the South County MSCP. Therefore, it does not require conformance with the Biological Mitigation Ordinance (BMO). The Project is consistent with the County's Guidelines for Determining

Significance for Biology, and the Resource Protection Ordinance (RPO), and. 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 the proposed project would have a less-than-significant impact for the reasons detailed above, the project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

Conclusion

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

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

Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
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5. Cultural Resources – Would the Project:

a) Cause a substantial adverse change in the significance of a historical resource as defined in 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Directly or indirectly destroy a unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Directly or indirectly destroy a unique paleontological resource or site?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion

A Negative Cultural Resources Survey Report was prepared for the project by BFSA Environmental Services, dated June 19, 2024. 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. There are two existing buildings on the project site that are older than 50 years old. However, both the existing gas station and convenience store development are located outside of the project’s limits of

disturbance and would not be impacted by the project. 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. The database from the South Coastal Information Center did not identify any previously recorded cultural resources within the project site. An archaeological survey of the project site was conducted on June 13, 2024. The survey did not identify any archeological resources within the area planned for development. As a precautionary measure for any inadvertent discoveries, the project will still be conditioned to include Archaeological and Tribal Monitoring, as well as a Cultural Resources Treatment Agreement and Preservation Plan throughout all grading activities. No impacts to cultural resources would occur.

As previously discussed, the GPU EIR determined impacts to archaeological resources as less than significant with mitigation. 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.

- 5(c) The GPU EIR concluded this impact to be less than significant. The site does contain any unique geologic features that have been listed in the County's Guidelines for Determining Significance for Unique Geology Resources nor does the site support any known geologic characteristics that have the potential to support unique geologic features.

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

- 5(d) The GPU EIR concluded this impact to be less than significant with mitigation. A review of the County's Paleontological Resources Maps and data on San Diego County's geologic formations indicates that the project is not located on geological formations that potentially contain unique 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.

- 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 Cul-4.1 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-4.1), would be applied to the project.

Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
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6. Energy Use – Would the Project:

a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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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, low-VOC thermal insulation, 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 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 efficiency of buildings and renewable energy generation, as well as reducing consumption and reliance on fossil fuels. The proposed project includes the following energy conservation measures:
- Incorporation of Title 24 energy standards.
 - Landscaping in compliance with the County’s Water Conservation in Landscaping Ordinance.
 - Low-VOC thermal insulation
 - Construction and demolition recycling in compliance with County Ordinance Section 68.511 through 68.520 (Diversion of Construction and Demolition Materials from Landfill Disposal).
 - 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in an on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

where sewers are not available for the disposal of wastewater?

Discussion

- 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 GPU EIR concluded this impact to be less than significant. To ensure the structural integrity of all buildings and structures, the proposed project must conform to the Seismic Requirements as outlined within the California Building Code. In addition, a soils compaction report with proposed foundation recommendation would be required to be approved before the issuance of a building permit. The report would review the qualities of the soil, its expansive characteristics, relative compaction and any soil problem which if not corrected may lead to structural defects of buildings or structures constructed or to be constructed on the site. During the review of the building permit, the County Building Official shall review the report and ensure measures are taken to prevent structural damage to future buildings or structures constructed on the site. Therefore, compliance with the California Building Code and the County Building Code would ensure that the project would not result in a significant impact.
- 7(a)(iii) The GPU EIR concluded this impact to be less than significant. The GPU EIR concluded this impact to be less than significant. The project site is within a "Potential Liquefaction Area" as identified in the County Guidelines for Determining Significance for Geologic Hazards. This indicates that there is liquefaction potential at the site. The project would be required to comply with the County's Grading Ordinance and Building Code and conduct a soils investigation prior to approval of a building permit. Therefore, compliance with the California Building Code and the County Building Code would ensure that the project would not result in a significant impact.

As previously discussed, the GPU EIR determined impacts from liquefaction 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 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.

- 7(a)(iv) The GPU EIR concluded this impact to be less than significant. The project site is 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. The project would not result in substantial soil erosion or the loss of topsoil because the project would be required to comply with the County's Watershed Protection, Stormwater Management, and Discharge Ordinance. Compliance with these ordinances would ensure that the project would not result in any unprotected erodible soils, would not substantially alter existing drainage patterns, and would not develop on steep slopes. Additionally, the project would be required to implement BMPs per the Standard Development Project Storm Water Quality Management Plan (SWQMP) to prevent fugitive sediment. See Section 10, Hydrology and Water Quality, for a detailed discussion. Therefore, project 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 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.

- 7(c) The GPU EIR concluded this impact to be less than significant. 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 project site is not underlain by expansive soils. The project would be required to submit a Soils Engineering Report by a California Certified Engineering Geologist prior to grading. The soils report is required to include a surficial stability analysis with design recommendations. All geotechnical recommendations provided in the soils report would be followed during grading and construction of the project.

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

- 7(e) The GPU EIR concluded this impact to be less than significant. The project would rely on sewer service provided by the Valley Center 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
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a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

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 commercial storage facility would be consistent with the Rural Commercial (C40) 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. The project will achieve Tier 2 status as set forth in the 2022 California Green Building Standards Code (CALGreen), Title 24, Part 11, Appendix A5 Nonresidential Voluntary Measures, Division A5.6, Tier 2.
3. The project will ensure that the newly constructed commercial storage buildings comply with 2022 CALGreen Section A5.601.3, Tier 2 for energy efficiency.
4. The project will comply with 2022 CALGreen Section A5.303.2.3.2 Tier 2 Water Efficiency and Conservation Requirements and use three elective measures from Sections A5.303, A5.304, and A5.305 as follows:
 - A5.303.2.3.2 Tier 2 – 20-percent savings.
 - A5.304.2 Outdoor water use.
 - A5.304.6 Restoration of areas disturbed by construction.
5. 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.
6. 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.
7. 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.
8. Comply with the County's Grading Ordinance and SDAPCD's fugitive dust rules outlined in Section 87.426 of the County's Grading Ordinance.
9. Utilize architectural coatings compliant with SDAPCD Rule 67.

10. Utilize low-VOC thermal insulation
11. The project would not result in any wasteful, inefficient, or unnecessary energy usage (see Section VI above).
12. The project will install Electric Vehicle (EV) charging infrastructure in compliance with the 2022 CALGreen requirements for Tier 2 standards as outlined in Appendix A5, Section A5.601.3 (Tier 2).
13. The project would have a less-than-significant impact from VMT (see Section 17 below).

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 Commercial (C40). Through its goals, policies, and land use designations, the County's General Plan aims to reduce countywide GHG emissions. The project would result in a less than significant impact from VMT. 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
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9. Hazards and Hazardous Materials – Would the Project:

a) Create a significant hazard to the public or the environment through the routine transport, storage, use, or disposal of hazardous materials or wastes or through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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b) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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c) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, or is otherwise known to have been subject to a release of hazardous substances and, as a result, would it create a significant hazard to the public or the environment?

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

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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e) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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g) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

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

Discussion

A Phase I Environmental Site Assessment (ESA) was prepared for the proposed project by TA-Group DD LLC dated July 18, 2025. The following responses have incorporated the analysis from the report.

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 Valley Center Fire Protection District. In addition, a Phase I Environmental Site Assessment was prepared for the project site. The assessment revealed no evidence of a recognized environmental condition in connection with project site. The project would not result through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

Operation of the project would not introduce a significant source of hazardous materials on-site. The operation of the self-storage facility would require the storage of cleaning supplies and other related chemicals. However, these materials are not acutely hazardous, and the project would handle and store these materials consistent with all applicable regulations. Landscaping activities including any pesticide or herbicide use would be conducted consistent with applicable regulations.

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 Valley Center Elementary approximately 1.3 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 (FHSZ). 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.

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

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 REC Consultants, INC dated May 8,2024. In addition, a Priority Development Plan (PDP) Stormwater Quality Management Plan (SQMP) was prepared for the proposed project by Alidade Engineering, dated December 18, 2024. The following responses have incorporated the analysis from the reports.

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 Valley Center (903.14) hydrologic sub-area within the San Luis Rey hydrologic unit. According to the Clean Water Act section 303(d) list, the lower San Luis Rey is impaired for selenium, phosphorus, chloride, total dissolved solids (TDS), and indicator bacteria like Enterococcus and total coliform. 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 Valley Center Municipal Water District that obtains water from imported sources. The project would not use groundwater for its potable water supply. The project would incrementally 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 Valley Center 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 site generally drains in a western direction towards Old Road where it then drains north. However, a small portion (0.179 ac) of the site drains to the east towards Valley Center Road. Post construction drainage would almost completely maintain the same drainage patterns as the pre-developed condition, except the area draining to the east would be rerouted west towards Old Road. The runoff from the developed project site would first arrive at a large portion of the project that is composed of pervious pavement (detaining some of the runoff) and runoff would be released slowly to one infiltration basin. The infiltration basin would include an ADS Aquabox System or equivalent beneath which would act as a spillway such that peak flows can be discharged to the receiving storm drain system.

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. The multi-purpose infiltration basin located within the project site was designed to be integrated to meet both the pollutant control and flow control requirements.

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. The project site is identified by FEMA as an "Area of Minimal Flood Hazard." Additionally, no habitable structures are proposed as part of the project. 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. The project site is identified by FEMA as an “Area of Minimal Flood Hazard.” Additionally, no habitable structures are proposed as part of the project. 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
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11. Land Use and Planning – Would the Project:

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

Discussion

11(a) The GPU EIR concluded this impact to be less than significant with mitigation. The project proposes the development of a commercial storage facility on a lot that is surrounded by similar rural commercial uses and rural 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 proposes the development of a commercial storage facility, which is consistent with the Rural Commercial (C40) land use and zoning designations for the project site. Surrounding land uses consist of similar rural commercial uses to the south and southeast and rural single-family residences to the west, south, and east. 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
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12. Mineral Resources – Would the Project:

a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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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 rural commercial and rural 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 5 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.

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

Discussion

A Noise Study was prepared for the proposed project by Ldn Consulting, Inc., dated April 8, 2025. The following responses have incorporated the analyses from the report.

- 13(a) The GPU EIR concluded this impact to be less than significant with mitigation. The project site is zoned Rural Commercial (C40) and surrounding properties are zoned Rural Commercial (C40), and Rural Residential (RR). 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:

Noise Ordinance – Section 36-404: Non-transportation noise generated by the project is not expected to exceed the standards of the Noise Ordinance at or beyond the project’s property line. The project is zoned Rural Commercial (C40) and surrounding properties are zoned Rural Commercial (C40), and Rural Residential (RR). Section 36.404 of the Noise Ordinance sets a most restrictive operational exterior noise limit for the RR noise sensitive land uses of 50 dBA Leq for daytime hours of 7 a.m. to 10 p.m. and 45 dBA Leq during the noise sensitive nighttime hours of 10 p.m. to 7 a.m. The project site noise level limit is 60 dBA Leq for daytime hours of 7 a.m. to 10 p.m. and 55 dBA Leq during the noise sensitive nighttime hours of 10 p.m. to 7 a.m. According to the noise ordinance when different zones adjoin, the limit is based on the arithmetic mean of the different zone noise level limit. Most of the project components would only operate during the daytime hours but a few may operate during nighttime or early morning hours and therefore the most restrictive and conservative approach is to apply the 50 dBA Leq nighttime standard at the property lines.

The project operations would occur during the daytime and overnight hours. On-site operational noise sources would include vehicle movements to bring or remove storage and rooftop mechanical ventilation units (HVAC) to provide climate control for the office. The proposed HVAC unit would be shielded by a metal screen that would provide a minimum 5 dBA noise reduction for a reference noise level of 62 dBA at 3 feet. The noise levels for each source along with the calculated hourly noise levels based upon individual operating times are shown below in Table 5 Operational Noise Levels (Nearest Property Line) for the nearest property line.

Table 5: Operational Noise Levels (Nearest Property Line)

Source	Reference Noise Level (dBA)	Reference Distance (feet)	Quantity	Distance to Nearest Property Line (feet)	Noise Reduction due to Distance (dBA)	Resultant Cumulative Noise Level (dBA0)
Moving Truck	63.2	4	1	44	-20.8	42
HVAC	62.0	3	1	240	-38.0	24
Cumulative Noise Level at Property Line (dBA)						42
Property Line Standard						50
Complies with Chapter 10.080.040						Yes

Source: LdN Consulting INC 2024

As shown the combined noise levels at the adjacent property line based upon distance separation, shielding, and limited duty-cycles were projected to be 43 dBA, which is below the City’s 50 dBA nighttime noise threshold.

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 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 self storage facility 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.

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)?

Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
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<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

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

14(a) The GPU EIR concluded this impact to be less than significant. The project proposes development of a commercial storage facility on a lot with a single-family residence and storage site that is surrounded by similar rural commercial uses and rural single-family residences. The project would remove the one single-family residence and would not provide housing or otherwise induce 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 project would remove the one single-family residence, which would not displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere. 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 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 remove the one single-family residence, which would not displace substantial numbers of existing people, necessitating the construction of replacement housing elsewhere. Impacts would be less than significant.

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

Conclusion

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

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

Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
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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 commercial storage facility, which is consistent with the existing Rural Commercial (C40) land use and zoning designations for the site. The project would not result in population growth and therefore 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. An electronic security gate would control access to the storage facility at the proposed driveway along Valley Center Road for purposes of security, which would be equipped with a Knox override switch to provide emergency access. The commercial storage facility would be served by existing public services. The commercial storage facility would not result in increased demand for existing neighborhood and regional parks or other recreational facilities. 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
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16. Recreation – Would the Project:

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

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

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

16(a) The GPU EIR concluded this impact to be less than significant with mitigation. The project includes development of a commercial storage facility, which is consistent with the existing Rural Commercial (C40) land use and zoning designations for the site. Surrounding land uses consist of similar rural commercial development to the south and southeast and rural single-family residences to the west, south, and east. The proposed commercial storage facility would not increase local population or otherwise 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. 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
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17. Transportation and Traffic – Would the Project:

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

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

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

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

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

17(a) The GPU EIR concluded this impact to be significant and unavoidable. The project would develop a commercial storage facility that would serve the community of Valley Center. The proposed project would not interfere with existing pedestrian, bicycle, and transit facilities surrounding the project site. Therefore, the project would not conflict with an applicable plan, ordinance or policy establishing measures of the effectiveness for the performance of the circulation system and impacts would be less than significant.

As previously discussed, the GPU EIR determined significant and unavoidable impacts to unincorporated County traffic and LOS standards. The County standard for the LOS on Mobility Element roads is LOS D. The project would have a less-than-significant impact 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 GPU EIR includes policies in the Land Use and Mobility Elements that address traffic and LOS standards. The relevant policies are: LU-5.1, LU-10.4, LU-11.8, LU-12.2, M-1.1, M-1.2, M-1.3, M-2.1, M-2.2, M-2.3, M-3.1, M-3.2, M-4.2, M-5.1, M-5.2, M-9.1, and M-9.2. These policies promote the reduction of vehicle trips, limit high-traffic uses in rural and semi-rural areas, encourage uses that would reduce the frequency of employee vehicle trips, require development to mitigate the significant impacts to existing service levels of public facilities, provide for an interconnected road network, encourage alternative transportation, establish LOS criteria, and apply appropriate road standards to future development. Adherence to these policies will further reduce impacts associated with County traffic and LOS standards from future development.

General Plan Policy M-2.1 sets forth the requirements for LOS. Policy M-2.1 requires development projects to provide associated road improvements necessary to achieve a LOS D or higher on all Mobility Element roads except for those where a failing LOS has been accepted by the County pursuant to the criteria specifically identified in the General Plan. When development is proposed on roads where a failing LOS has been accepted, require feasible mitigation in the form of road improvements or a fair share contribution to a road improvement program, consistent with the Mobility Element road network.

In addition to policy in the General Plan, the GPU EIR identifies mitigation measures that would partially mitigate this significant and unavoidable impact. The mitigation measures applicable to the project are as follows:

- **GPU MM Tra-1.3** is the implementation of County Public Road Standards during review of new development projects. Tra-1.3 also includes revision of the Public Road Standards to include a range of road types according to Regional Category context. Application of this measure will ensure that LOS standards are met when feasible and that appropriate road types are assigned based the specifics of the development.
- **GPU MM Tra-1.4** is the implementation, and revision as necessary, of the County Guidelines for Determining Significance for Transportation and Traffic to evaluate adverse environmental effects of projects and require mitigation when significant impacts are identified. This measure will ensure that appropriate site design and mitigating measures are applied to minimize traffic increases and road deficiencies associated with future development under the General Plan Update.
- **GPU MM Tra-1.7** is the implementation of the San Diego County Transportation Impact Fee (TIF) Ordinance, which defrays the costs of constructing planned transportation facilities necessary to accommodate increased traffic generated by future development. This measure will help reduce financial barriers associated with accommodating increased traffic and/or meeting LOS standards.

The project will be built to public road standards (GPU MM Tra-1.3), would comply with the County Guidelines for Determining Significance for Transportation and Traffic dated August 24, 2011 (GPU MM Tra-1.4), and would pay a fair share contribution into the County's Transportation Impact Fee (TIF) Ordinance.

The project is consistent with General Plan policies for the reduction of impacts from traffic and transportation and would implement the relevant and feasible mitigation measures from the GPU EIR. Therefore, the project would result in a less than significant impact on traffic and transportation. The GPU EIR concluded this impact to be significant and unavoidable.

The Guidelines for Determining Significance Transportation and Traffic, August 24, 2011 (Appendix C), are the applicable guidelines and standards associated with projects consistent with the General Plan. GPU EIR mitigation measure Tra-1.4 requires implementation of the Guidelines for Determining Significance for Transportation and Traffic to, in part, require mitigation when significant impacts are identified. These 2011 Guidelines ensure that General Plan-consistent projects reduce impacts and mitigate to the extent feasible providing for analysis and disclosure of impacts addressed in the GPU EIR.

Since the GPU EIR was certified, CEQA Guidelines Section 15064.3 was revised to make vehicle miles traveled (VMT) the metric for evaluating a project's transportation impacts. In accordance with GPU EIR mitigation measure Tra-1.4, the County revised these Guidelines for Determining Significance for Transportation and Traffic to update following passage of Senate Bill 743 requiring VMT analysis under CEQA and replacing LOS as the standard. Because the GPU EIR was certified prior to passage of SB 743, the County Guidelines for Determining Significance for Transportation and Traffic applicable to General Plan-consistent projects remain the August 24, 2011, Guidelines prepared to analyze traffic and transportation and mitigate any significant effects of projects consistent with the General Plan.

CEQA 21083.3 and CEQA Guidelines Section 15183 set forth the requirements for projects that are consistent with the County General Plan. CEQA Guidelines Section 15183(a) mandates that projects which are consistent with the development density established by the General Plan policies for which the GPU EIR was certified shall not require additional environmental review, except as necessary to examine if there are any project effects that result in new or more severe impacts to traffic and transportation. Because the project is consistent with the General Plan, and all impacts from traffic and transportation would be reduced to a level of less than significant with application of existing General Plan policies and GPU EIR mitigation measures, the project would not result in any peculiar impacts.

The project includes a commercial storage facility intended to serve the community of Valley Center. Pursuant to the current CEQA Guidelines, the project qualifies as "locally serving" and is therefore not required to prepare a VMT analysis. Based on the SANDAG trip generation rates, the 69,000-square-foot facility is estimated to generate 138 daily trips which is less than the 200 daily trips threshold criteria for requiring a traffic impact study. Lastly, the project will address cumulative impacts through payment of a Transportation Impact Fee (TIF).

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

- 17(c) The GPU EIR concluded this impact to be less than significant with mitigation. The project site is not located within an Airport Influence Area, Airport Safety Zone, 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 Valley Center Road would meet County design standards and provide adequate sight distance.

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 proposed driveway along Valley Center Road 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. An electronic security gate would control access to the storage facility at the proposed driveway along Valley Center Road, and would be equipped with a Knox override switch to provide emergency access.

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.

The project has been reviewed for consistency with the Valley Center Road Corridor Concept Plan. The Concept Plan establishes design standards and circulation improvements intended to enhance safety, multimodal mobility, and corridor performance along Valley Center Road. As part of the project, a Centerline Letter was prepared to evaluate the applicable frontage and circulation requirements. The analysis concluded that, with implementation of the centerline dedication and associated improvements, the project is consistent with the adopted Concept Plan.

Although the project access is proposed to shift from Valley Center Road to Old River Road, this change does not trigger any additional improvements under the Corridor Concept Plan and does not conflict with any adopted policies related to public transit, bicycle, or pedestrian facilities. The project does not propose modifications that would reduce safety or otherwise degrade the performance of facilities addressed in the Concept Plan. Therefore, the project would not conflict

with any adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, nor would it decrease the performance or safety of such facilities.

In addition, 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
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18. Tribal Cultural Resources – Would the Project:

- a) Cause a substantial adverse change in the significance of a tribal cultural resource, as defined in Public Resources Code §21074 as either a site, feature, place, or cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:
 - i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of Historical Resources as defined in Public Resources Code §5020.1(k), or
 - ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to

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

criteria set forth in subdivision (c) of Public Resources Code §5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code §5024.1, the Lead Agency shall consider the significance of the resource to a California Native American tribe.

Discussion

Tribal Cultural Resources was not specifically analyzed within the GPU EIR as a separate issue area under CEQA. At the time, archaeological resources and human remains were discussed under GPU EIR Section 2.5 Cultural and Paleontological Resources. In 2015, the issue of Tribal Cultural Resources was separated into its own section within Appendix G of the CEQA Guidelines to incorporate the two 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 impacts to potential Tribal Cultural Resources was determined to be significant with mitigation for Tribal Cultural Resources related to archaeological resources and human remains.

- 18(a) A Cultural Resources Survey Report was prepared for the project by BFS Environmental Services, dated June 19, 2024. The report did not identify any historical or archaeological resources at the project site. As a precautionary measure for any inadvertent discoveries and consistent with General Plan EIR Mitigation Measures Cul-2.5 and Cul-4.1, the project will still be conditioned to include Archaeological and Tribal Monitoring, as well as a Cultural Resources Treatment Agreement and Preservation Plan throughout all grading activities.

Consistent with General Plan EIR Mitigation Measures Cul 2.2, Cul-2.4, Cul-2.6, and Cul-4.1 and General Plan Policy-11.4 – Collaboration with Agencies and Jurisdictions, the County initiated coordination with California Native American tribes traditionally and culturally affiliated with the project site on August 22, 2025. The following tribes requested further discussion regarding the project: Pala Band of Mission Indians and Rincon Band of Luiseño Indians. The County met with Pala Band of Mission Indians on December 1, 2025. As of March 4, 2026 the Pala Band of Mission Indians concurred with the conditions of the project and application of tribal monitoring. On November 10, 2025, the Rincon Band of Luiseño Indians requested archaeological and tribal monitoring for all ground disturbing activities for the project. The County met with the Rincon Band of Luiseño Indians on February 25, 2026, and they did not want to discuss the project. On March 3, 2026, the County sent final conditions and request to end coordination. No Tribal Cultural Resources were identified during discussions and coordination with the tribes. As such, there are no impacts to tribal cultural resources.

As previously stated, impacts to Tribal Cultural Resources that were analyzed within the GPU EIR within Section 2.5, Cultural and Paleontological Resources were determined to be significant with mitigation. The project would implement measures consistent with the GPU EIR. 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 Tribal Cultural 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 would be required because no project specific impacts would occur.

Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
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19. Utilities and Service Systems – Would the Project:

a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project’s projected demand in addition to the provider’s existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) Be served by a landfill with sufficient permitted capacity to accommodate the project’s solid waste disposal needs?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
g) Comply with federal, state, and local statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion

19(a) The GPU EIR concluded this impact to be less than significant with mitigation. The project includes development of a commercial storage facility, which is consistent with the Rural Commercial (C40) land use and zoning designations for the project site. The project is located within the Valley Center 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.

- 19(b) The GPU EIR concluded this impact to be less than significant with mitigation. The project includes development of a commercial storage facility, which is consistent with the Rural Commercial (C40) land use and zoning designations for the project site. The project site and existing surrounding residences are served by Valley Center 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.

- 19(c) The GPU EIR concluded this impact to be less than significant with mitigation. The project involves new storm water drainage facilities, including a propose infiltration basin; however, these storm water drainage facilities would not result in additional adverse physical effects as described in Section 10, Hydrology and Water Quality.

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.

- 19(d) The GPU EIR concluded this impact to be significant and unavoidable. The project would receive water from the Valley Center Municipal Water District, which has adequate water to serve the commercial storage facility. For instance, the proposed commercial storage facility is consistent with the Rural Commercial (C40) land use and zoning designations for the project site and therefore, was planned for in Valley Center Municipal Water District's water demand projections. The commercial storage facility 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.

- 19(e) The GPU EIR concluded this impact to be less than significant with mitigation. The project would require wastewater services from the Valley Center Municipal Water District, which has adequate services available to serve the commercial storage facility. 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.

- 19(f) The GPU EIR concluded this impact to be significant and unavoidable. The project includes development of a commercial storage facility, which is consistent with the Rural Commercial (C40) land use and zoning designations for the project site and therefore, was planned for in the County’s solid waste disposal projections. The commercial storage facility 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.
- 19(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
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20. Wildfire – If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the Project:

a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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.

20(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 Valley Center Fire Protection District and CAL FIRE and is located approximately 0.4 mile (driving distance) from the nearest fire station, which is located at 28234 Lilac Road. The expected emergency travel time to the proposed Project would be 2 minutes. Therefore, the project would meet the required travel response time of 5 minutes. Access would be provided by the proposed private driveway along Valley Center Road. An electronic security gate would control access to the storage facility at the proposed driveway along Valley Center Road, and would be equipped with a Knox override switch to provide emergency access.

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.

20(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.

- 20(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, internal roads, and landscaped areas. The project also requires utility connections for service from the Valley Center 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.

- 20(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:

5. No peculiar impacts to the project or its site have been identified.
6. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
7. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
8. 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. July 28 2025.

Biological Resources Memo. Klutz Biological Consulting. June 20, 2024.

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

Drainage Study. REC Consulting. May 8, 2024.

Negative Cultural Resources Survey Report BFSA Environmental Services,
a Perennial Company June 19, 2024

Noise Assessment LDN Consulting Inc. April 8, 2025

Phase I Environmental Site Assessment TA-Group DD LLC July 18, 2025

Stormwater Quality Management Plan for Priority Development Projects Alidade Engineering
November 13, 2025

Compiled Service Availability Forms (399F, 399W, 399S)

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](http://www.sdcounty.ca.gov/PDS/gpupdate/docs/BOS_Aug2011/EIR/FEIR_5.00_-_References_2011.pdf)

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preparation-health-risk-0](https://oehha.ca.gov/air/crnrr/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

Appendix C

The Guidelines for Determining Significance Transportation and Traffic, August 24, 2011 is available on the Planning and Development Services website at:

https://www.sandiegocounty.gov/content/dam/sdc/dplu/docs/Traffic_Guidelines.pdf