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August 6, 2026

**CEQA Initial Study - Environmental Checklist Form
(Based on the State CEQA Guidelines, Appendix G)**

1. Title; Project Number(s); Environmental Log Number:
Pizzuto Residence; PDS2018-LDGRMN-20216
2. Lead agency name and address:
County of San Diego, Planning & Development Services
3. 5510 Overland Avenue, Suite 110
San Diego, CA 92123-1239
4. a. Contact Souphalak Sakdarak, Planner
b. Phone number: (619) 323-4869
c. E-mail: Souphalak.Sakdarak@sdcounty.ca.gov.
5. Project location:
2755 Deer Springs Place
San Marcos, CA 92069
Thomas Guide Coordinates: Page 1089, Grid A/6
APN: 178-100-07-00
6. Project Applicant name and address:

Carl J Pizzuto
2755 Deer Springs Place
San Marcos, CA 92069
7. General Plan: Semi-Rural Residential (SR-10)
Community Plan: North County Metro
Density: -
Floor Area Ratio (FAR) -
8. Zoning
Use Regulation: Limited Agricultural (A70)
Minimum Lot Size: 4 acre(s)
Special Area Regulation: -

9. Description of project:

The proposed project consists of a minor grading plan to address the grading violation for a residential parcel. The grading plan will permit previously completed, unauthorized grading. All earthwork has already occurred, and no additional grading or construction is proposed. The plan documents an even cut and fill of approximately 1,207 cubic yards on a 40-acre site, reflecting the work completed in the field. The site is vacant. Access would be provided by a private driveway connecting to Deer Springs Place, private road. The project site is located in the North County Metro Subregional Plan within unincorporated San Diego County. The site is vacant. Access would be provided by a private driveway connecting to Deer Springs Place, private road. APN 178-100-07-00.

10. Surrounding land uses and setting (Briefly describe the project's surroundings):

The project is vacant land located on a steep hillside approximately ¼ mile north of Deer Spring Road. The vegetation on the site consists almost entirely of Coastal Sage/Chaparral Scrub. To the east, on a comparably size parcel is covered with an avocado orchard, a primary residence at the highest point. To the north are 40-acre parcels of open, vacant mountains covered with native vegetation, part of the Merriam Mountains. To the west and northwest, the land drops off abruptly into a deep valley consisting of non-native grasslands with few residences. Across the valley to the west and northwest are mostly vacant lands, mountains and native vegetation with some orchards more to the southwest. A few large rural estates residences are scattered across the vista of the southwest. Directly to the south and at a lower elevation, along Deer Spring Place and Deer Springs Road, are several rural residential lots ranging in size from 3.84 acres to 13.75 acres. A large nursery is also located to the south, along Deer Spring Road.

11. Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement):

<u>Permit Type/Action</u>	<u>Agency</u>
Minor Grading Permit	County of San Diego
General Construction Storm water Permit	Regional Water Quality Control Board
Water District Approval	Vallecitos Water District
Septic Tank Permit	County of San Diego Department of Environmental Health
Fire District Approval	Deer Springs Fire Protection Districts

11. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code §21080.3.1? If so, has consultation begun?

YES
☒

NO
☐

Note: Conducting consultation early in the CEQA process allows tribal governments, public lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and to reduce the potential for delay and conflict in the environmental review process (see Public Resources Code §21080.3.2). Information is also available from the Native American Heritage Commission's Sacred Lands File per Public Resources Code §5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code §21082.3(e) contains provisions specific to confidentiality.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED: The environmental factors checked below would be potentially affected by this project and involve at least one impact that is a "Potentially Significant Impact" or a "Less Than Significant With Mitigation Incorporated," as indicated by the checklist on the following pages.

- | | | |
|---|--|--|
| ☐ <u>Aesthetics</u> | ☐ <u>Agriculture and Forest Resources</u> | ☐ <u>Air Quality</u> |
| ☒ <u>Biological Resources</u> | ☒ <u>Cultural Resources</u> | ☐ <u>Geology & Soils</u> |
| ☐ <u>Greenhouse Gas Emissions</u> | ☐ <u>Hazards & Haz. Materials</u> | ☐ <u>Hydrology & Water Quality</u> |
| ☐ <u>Land Use & Planning</u> | ☐ <u>Mineral Resources</u> | ☐ <u>Noise</u> |
| ☐ <u>Population & Housing</u> | ☐ <u>Public Services</u> | ☐ <u>Recreation</u> |
| ☐ <u>Transportation/Traffic</u> | ☐ <u>Utilities & Service Systems</u> | ☐ <u>Mandatory Findings of Significance</u> |

DETERMINATION: (To be completed by the Lead Agency)

On the basis of this initial evaluation:

- ☐ On the basis of this Initial Study, Planning & Development Services finds that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- ☒ On the basis of this Initial Study, Planning & Development Services finds that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- ☐ On the basis of this Initial Study, Planning & Development Services finds that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

Signature

Souphalak Sakdarak

Printed Name

Date

Land Use/Environmental Planner

Title

INSTRUCTIONS ON EVALUATION OF ENVIRONMENTAL IMPACTS

1. A brief explanation is required for all answers except “No Impact” answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A “No Impact” answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
2. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, Less Than Significant With Mitigation Incorporated, or less than significant. “Potentially Significant Impact” is appropriate if there is substantial evidence that an effect may be significant. If there are one or more “Potentially Significant Impact” entries when the determination is made, an EIR is required.
4. “Less Than Significant With Mitigation Incorporated” applies where the incorporation of mitigation measures has reduced an effect from “Potentially Significant Impact” to a “Less Than Significant Impact.” The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level.
5. Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
 - a) Earlier Analysis Used. Identify and state where they are available for review.
 - b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c) Mitigation Measures. For effects that are “Less Than Significant With Mitigation Incorporated,” describe the mitigation measures that were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
7. The explanation of each issue should identify:
 - a) The significance criteria or threshold, if any, used to evaluate each question; and
 - b) The mitigation measure identified, if any, to reduce the impact to less than significance

I. AESTHETICS. Except as provided in Public Resources Code Section 21099. Would the project:

a) Have a substantial adverse effect on a scenic vista?

- | | |
|---|--|
| ☐ Potentially Significant Impact | ☒ Less than Significant Impact |
| ☐ Less Than Significant With Mitigation Incorporated | ☐ No Impact |

Discussion/Explanation: 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.

Less Than Significant Impact: 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 proposed project involves minor grading to correct unpermitted earthwork on a residential lot. The amount of grading consists of approximately 1,207 cubic yards of balanced cut and fill. Grading is a common component of residential development and is consistent with the surrounding visual character, as similar grading occurs on nearly all nearby residential lots to create level building pads, driveways, and usable yard areas. Because the project does not introduce new structures or substantially alter the landform beyond what is typical for residential development, it would not result in a substantial adverse effect on a scenic vista.

The project would also not result in a cumulatively considerable impact. Other past, present, and reasonably foreseeable projects within the same viewshed were reviewed (see Section XVIII, Mandatory Findings of Significance). Due to the project site's distance from Interstate 15 (approximately 1.3 miles), existing natural landform screening, and required landscaping, the project would not contribute to a cumulative adverse effect on scenic vistas.

b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

- | | |
|---|--|
| ☐ Potentially Significant Impact | ☒ Less than Significant Impact |
| ☐ Less Than Significant With Mitigation Incorporated | ☐ No Impact |

Discussion/Explanation: 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.

Less Than Significant Impact: The project site is located near or visible within the composite viewshed of a State scenic highway. 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 proposed project consists of minor grading to correct unpermitted earthwork on a residential lot. No additional grading or new structures would be introduced as part of this grading plan. Furthermore, grading of this type is typical for residential development and necessary to create level pads, manage drainage, and support standard site use. As such, the project is consistent with the existing visual character of the surrounding area.

The viewshed and visible components of the landscape within the composite viewshed of the scenic highway, including the underlying landform and overlaying landcover, establish the visual environment. The visual environment of the subject scenic highway and resources extends from State Route 78 to Riverside County; and the visual composition consists of steep to rolling foothills, natural vegetation, and dense rock outcroppings.

The project will not result in cumulative impacts on a scenic vista because the proposed project viewshed and past, present and future projects within that viewshed were evaluated to determine their cumulative effects. Refer to XVIII. Mandatory Findings of Significance for a comprehensive list of the projects considered. Those projects listed in Section XVII are located within the scenic vista's viewshed and will not contribute to a cumulative impact because: The site is not visible from the I-15 Scenic Corridor. The project is a grading plan to rectify the grading that was completed without the benefit of a permit. Therefore, the project will not result in any adverse project or cumulative level effect on a scenic resource within a State scenic highway.

- c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

- | | |
|---|--|
| ☐ Potentially Significant Impact | ☒ Less than Significant Impact |
|---|--|

☐ Less Than Significant With Mitigation Incorporated ☐ No Impact

Discussion/Explanation: 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.

Less Than Significant Impact: The existing visual character and quality of the project site and surroundings can be characterized as steep rolling foothills, natural vegetation, and dense rock outcroppings. The proposed project consists of a minor grading plan intended to rectify unpermitted grading previously conducted on a residential zone lot. The project is compatible with the existing visual character and quality of the surrounding area because no permanent structures are proposed. The site has already been disturbed and is currently associated with an open code violation case. The project would remedy the violation by stabilizing the slope and bringing the site into compliance with County regulations. No further grading would be required on the site, therefore, the project would not substantially degrade the existing visual character or quality of public reviews.

The project will not result in cumulative impacts on visual character or quality because the entire existing viewshed and a list of past, present and future projects within that viewshed were evaluated. Refer to XVII. Mandatory Findings of Significance for a comprehensive list of the projects considered. Those projects listed in Section XVII are located within the viewshed surrounding the project and will not contribute to a cumulative impact for the following reasons: The existing landscaping will help the proposed roadway and single-family dwellings to blend in with the surrounding land; also the large lots will ensure consistency with the surrounding development. Therefore, the project will not result in any adverse project or cumulative level effect on visual character or quality on-site or in the surrounding area.

d) Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?

☐ Potentially Significant Impact ☐ Less than Significant Impact
☐ Less Than Significant With Mitigation Incorporated ☒ No Impact

Discussion/Explanation:

No Impact: The project does not propose any use of outdoor lighting or building materials with highly reflective properties such as highly reflective glass or high-gloss surface colors. The proposed project is a grading plan to rectify grading that was completed on the site without a permit. No further grading or construction activities are proposed. Therefore, the project will not create any new sources of light pollution that could contribute to skyglow, light trespass or glare and adversely affect day or nighttime views in area.

The project will not contribute to significant cumulative impacts on day or nighttime views because no further grading would occur and no construction will commence. Future use on the site would need to comply with all applicable codes and regulations.

The Code was developed by the San Diego County Department of Planning and Land Use and Department of Public Works in cooperation with lighting engineers, astronomers, land use planners from San Diego Gas and Electric, Palomar and Mount Laguna observatories, and local community planning and sponsor groups to effectively address and minimize the impact of new sources light pollution on nighttime views. The standards in the Code are the result of this collaborative effort and establish an acceptable level for new lighting. Compliance with the Code is required prior to issuance of any building permit for any project. Mandatory compliance for all new building permits ensures that this project in combination with all past, present and future projects will not contribute to a cumulatively considerable impact. Therefore, compliance with the Code, in combination with the outdoor lighting and glare controls listed above ensure that the project will not create a significant new source of substantial light or glare, which would adversely affect daytime or nighttime views in the area, on a project or cumulative level.

II. AGRICULTURE AND FORESTRY RESOURCES

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

- | | |
|---|--|
| ☐ Potentially Significant Impact | ☒ Less than Significant Impact |
| ☐ Less Than Significant With Mitigation Incorporated | ☐ No Impact |

Discussion/Explanation:

Less than Significant Impact: Small areas to the east and south of the project area, within a radius of one mile, has land designated as Unique Farmland. Another area, further to the west and southwest, contains Prime Farmlands. As a result, the proposed project was reviewed further and determined not to have significant adverse project or cumulative level impacts related to the conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to a non-agricultural use for the following reasons: The proposed project consists of a minor grading plan to address the grading violation for a residential parcel. The grading plan will permit previously completed, unauthorized grading. All earthwork has already occurred, and no additional grading or construction is proposed. The plan documents an even cut and fill of approximately 1,207 cubic yards on a 40-acre site, reflecting the work completed in the field. The current project site is vacant lands with steep slopes and native vegetation; no agriculture has ever been done within the 40-acre parcel and the County of San Diego maps show that there is no Prime Farmland, no Unique Farmland, or Farmland of Statewide importance within the boundary of the project. Therefore, no potentially significant project or cumulative level conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to a non-agricultural use will occur as a result of this project.

b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?

- | | |
|---|---|
| ☐ Potentially Significant Impact | ☐ Less than Significant Impact |
| ☐ Less Than Significant With Mitigation Incorporated | ☒ No Impact |

Discussion/Explanation:

No Impact: The project site is zoned Limited Agriculture (A70). The proposed project consists of remedial grading to address a grading violation on a previously disturbed portion of the property. The project does not propose change in land use, rezoning in, or any activity that would conflict with the intent or permitted uses of the A70 zone. Additionally, the project site is not subject to a Williamson Act contract. The proposed grading would not convert agricultural land to a non-agricultural use, remove agricultural zoning, or interfere with existing agricultural operations. Therefore, the project would not conflict with existing zoning for agricultural use or a Williamson Act contract, and no impact would occur.

c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), or timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?

- | | |
|---|---|
| ☐ Potentially Significant Impact | ☐ Less than Significant Impact |
| ☐ Less Than Significant With Mitigation Incorporated | ☒ No Impact |

Discussion/Explanation:

No Impact: The project site including offsite improvements do 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 of the property is not proposed. Therefore, project implementation would not conflict with existing zoning for, or cause rezoning of, forest land, timberland or timberland production zones.

d) Result in the loss of forest land or 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?

- | | |
|---|---|
| ☐ Potentially Significant Impact | ☐ Less than Significant Impact |
| ☐ Less Than Significant With Mitigation Incorporated | ☒ No Impact |

Discussion/Explanation:

No Impact: The project site including any offsite improvements does not contain any forest lands as defined in Public Resources Code section 12220(g), therefore project implementation would not result in the loss or conversion of forest land to a non-forest use. In addition, the project is not located in the vicinity of offsite forest resources.

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 or conversion of forest land to non-forest use?

- | | |
|---|--|
| ☐ Potentially Significant Impact | ☒ Less than Significant Impact |
| ☐ Less Than Significant With Mitigation Incorporated | ☐ No Impact |

Discussion/Explanation:

Less Than Significant Impact: Small areas to the east and south of the project site, within approximately one mile, are designated as Unique Farmland. Additional areas to the west and southwest contain Prime Farmland. The proposed project was reviewed for its potential to convert Important Farmland or other agricultural resources to non-agricultural use, and no significant project-level or cumulative impacts were identified. The project site consists of vacant land characterized by steep slopes and native vegetation. No agricultural activities have historically occurred on the 40-acre parcel. According to the County of San Diego Important Farmland mapping, the project site does not contain Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. Therefore, the project would not directly convert Important Farmland to non-agricultural use.

The proposed grading area is located within approximately 200 feet of the eastern property boundary, adjacent to a neighboring parcel that contains an avocado orchard. However, the project consists of remedial grading activities on a previously disturbed site and would not introduce a sensitive or incompatible land use that would interfere with adjacent agricultural operations. In addition, residential development is generally considered compatible with nearby agricultural uses when appropriate separation and standard construction practices are maintained. The project would not alter existing agricultural activities, restrict ongoing farming operations, or induce the conversion of surrounding agricultural lands to non-agricultural uses. Standard construction practices and compliance with applicable County regulations would further minimize the potential for conflicts with nearby agricultural uses.

Therefore, the project would not result in the conversion of Prime Farmland, Unique Farmland, Farmland of Statewide Importance, or forest land to non-agricultural, or non-forest uses. Impacts would be less than significant, and no mitigation is required.

III. AIR QUALITY -- Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. 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)?

- | | |
|---|--|
| ☐ Potentially Significant Impact | ☒ Less than Significant Impact |
| ☐ Less Than Significant With Mitigation Incorporated | ☐ No Impact |

Discussion/Explanation:

Less Than Significant Impact: 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.

The proposed project consists of a grading permit to remediate unpermitted grading on a residentially designated parcel. The project would produce emissions during grading operations. Equipment used for grading activities includes tractors, loaders, backhoes, dozers, excavators, blades, and concrete trucks. The project would not alter the planned land use designation or increase development density beyond that anticipated in the SANDAG growth projections used in preparation of the Regional Air Quality Strategy (RAQS) and applicable State Implementation Plan (SIP).

The RAQS rely on population and projected growth in the County and project future mobile, area, and all other source emissions. Based on these emissions, the RAQS determine the strategies necessary for the reduction of stationary source emissions through regulatory controls. Mobile source emission projections and growth projections are based on population and vehicle trends and land use plans developed by cities and the County. As such, projects that are consistent with the growth anticipated in the General Plan would be considered consistent with the RAQS. The as-built grading consists of an even cut and fill of 1,207 cubic yards of soil. No soil import or export will be required.

Construction and operational emissions associated with the project would be temporary and limited in scope, and project emissions would remain below applicable screening-level thresholds. The project would therefore not conflict with or obstruct implementation of the RAQS or SIP, nor would it violate an air quality standard or contribute substantially to an existing or projected air quality violation. Although temporary air emissions would be produced during grading activities as discussed in response III. Air Quality, b), no new development is proposed, and no long-term emissions from mobile or other sources would be produced once the construction activities are complete. The project is consistent with the intended use of the site and, therefore, consistent with the regional growth projections by the San Diego Association of Governments (SANDAG) and those used in the development of the RAQS and SIP. Therefore, the project would not conflict with or obstruct the implementation of the RAQS or the SIP, and impacts would be less than significant.

b) 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?

- ☐ Potentially Significant Impact
 ☒ Less than Significant Impact
☐ Less Than Significant With Mitigation Incorporated
 ☐ No Impact

Discussion/Explanation:

Less Than Significant Impact: The San Diego Air Pollution Control District (APCD) does not provide quantitative thresholds for determining the significance of construction or mobile source-related impacts. However, the APCD does specify Air Quality Impact Analysis (AQIA) trigger levels for new or modified stationary sources (APCD Rules 20.2 and 20.3). If these incremental levels for stationary sources are exceeded, an AQIA must be performed for the proposed new or modified source. Although these trigger levels do not generally apply to mobile sources or general land development projects, for comparative purposes these levels may be used to evaluate the increased emissions which would be discharged to the San Diego Air Basin from proposed land development projects. For projects whose stationary-source emissions are below these criteria, no AQIA is typically required, and project level emissions are presumed to be less than significant.

For CEQA purposes, these screening level thresholds (SLTs) can be used to demonstrate that a project's total emissions would not result in a significant impact to air quality. The daily SLTs are most appropriately used for standard construction and operational emissions. When project emissions have the potential to approach or exceed the SLTs listed below in Table 1, additional air quality modeling may need to be prepared to demonstrate that ground level concentrations resulting from project emissions (with background levels) will be below National and California Ambient Air Quality Standard (NAAQS and CAAQS, respectively).

APCD Rules 20.2 and 20.3 do not have AQIA thresholds for emissions of volatile organic compounds (VOCs) and PM_{2.5}. The use of the screening level for VOCs specified by the South Coast Air Quality Management District (SCAQMD), which generally has stricter emissions thresholds than San Diego's APCD, is recommended for evaluating projects in San Diego County. For PM_{2.5}, the U.S. Environmental Protection Agency (USEPA) "Proposed Rule to Implement the Fine Particle National Ambient Air Quality Standards" published September 8, 2005, which quantifies significant emissions as 10 tons per year, will be used as the screening-level criteria as shown in Table 1 below:

Table 1. San Diego County Screening-Level Thresholds for Air Quality Impact Analysis

Pollutant	Total Emissions		
	Lbs. per Hour	Lbs. per Day	Tons per Year
Respirable Particulate Matter (PM ₁₀)	---	100	15
Fine Particulate Matter (PM _{2.5})	--- *	55	10*
Nitrogen Oxides (NO _x)	25	250	40

Sulfur Oxides (SO _x)	25	250	40
Carbon Monoxide (CO)	100	550	100
Lead	---	3.2	0.6
Volatile Organic Compounds (VOCs)	---	75**	13.7***

Notes: * USEPA "Proposed Rule to Implement the Fine Particle National Ambient Air Quality Standards" published September 8, 2005. Also used by the SCAQMD.

** Threshold for VOCs based on the threshold of significance for VOCs from the SCAQMD for the Coachella Valley.

*** 13.7 Tons Per Year threshold based on 75 lbs/day multiplied by 365 days/year and divided by 2,000 lbs/ton.

Less Than Significant Impact: Currently, San Diego County is in "non-attainment" status for the NAAQS and CAAQS federal and state Ozone (O₃) and state Particulate Matter less than or equal to 10 microns and less than or equal to 2.5 microns (PM₁₀ and PM_{2.5}). O₃ 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 PM₁₀ 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.

Air quality emissions associated with the project would include PM, NO_x, CO, and VOCs from grading activities. The project would not contribute to any operational sources outside of existing conditions because no new development is proposed, and no long-term emissions from mobile or other sources would be produced once the construction activities are complete. The project would disturb about 0.78 acre of the 41.14 acres parcel and requires minimal work to remedy the code violation case. This is based on the grading schedule requiring 9 to 12 weeks of work, with no import or export of material required. In addition, grading operations associated with the project would be subject to the County of San Diego Grading Ordinance and the San Diego Air Pollution Control District (SDAPCD) Rule 55, which requires the implementation of dust control measures (e.g., watering, application of surfactants, control of vehicle speeds) during grading activities. An analysis of estimated construction emissions from project grading was completed using SCAQMD's California Emissions Estimator Model (CalEEMod). As shown in Table 2 below, project-related air emissions are not anticipated to reach screening-level thresholds identified in Table 1 as established by the San Diego County APCD. Therefore, the project would not result in substantial emissions such that any criteria pollutant air quality standard would be violated. Therefore, the project would not result in a cumulatively considerable net increase of any criteria pollutant; impacts would be less than significant.

Table 2. Estimated Project-Related Air Emissions

Pollutant	Project Emissions (Lbs. per Day)	Screening-Level Thresholds (Lbs. per Day)	Above Threshold?
Respirable Particulate Matter (PM ₁₀)	5.7	100	No
Fine Particulate Matter (PM _{2.5})	2.6	55	No
Nitrogen Oxides (NO _x)	9.2	250	No
Sulfur Oxides (SO _x)	0.02	250	No

Carbon Monoxide (CO)	10	550	No
Volatile Organic Compounds (VOCs)	1.2	75	No

Note: CalEEMod does not report on lead emissions and therefore, it is not included in this analysis.

Cumulative impacts could occur if the most intensive phases of construction for the proposed project occur simultaneously with intensive phases of other construction 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. The project's estimated emissions of criteria air pollutants, specifically PM₁₀, were estimated to be a maximum of 5.7 lb/day, which is well below the County's SLTs of 100 lb/day during construction activities. In addition, due to the highly dispersive nature of PM, 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 General Plan Update EIR. The RAQS and SIP were prepared consistent with growth forecasts in the General Plan. 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.

c) Expose sensitive receptors to substantial pollutant concentrations?

- ☐ Potentially Significant Impact
 ☒ Less than Significant Impact
☐ Less Than Significant With Mitigation Incorporated
 ☐ No Impact

Discussion/Explanation: Air quality regulators typically define sensitive receptors as schools (Preschool-12th Grade), hospitals, resident care facilities, or day-care centers, or other facilities that may house individuals with health conditions that would be adversely impacted by changes in air quality. The County of San Diego also considers residences as sensitive receptors since they house children and the elderly.

Less Than Significant Impact: Air quality regulators typically define sensitive receptors as schools (Preschool-12th Grade), hospitals, resident care facilities, or day-care centers, or other facilities that may house individuals with health conditions that would be adversely impacted by changes in air quality. The County of San Diego also considers residences as sensitive receptors since they house children and the elderly.

The project will not introduce a new "sensitive receptor" into the project area as the project site is developed with an existing residence. The project is a grading plan to rectify a grading violation on a residential zoned parcel. No additional grading activities will occur on the site than what was previously disturbed. In addition, the project does not propose uses or activities that would result in exposure of these sensitive receptors to significant pollutant concentrations and will not

place sensitive receptors near carbon monoxide hotspots. Further, the project will not contribute to a cumulatively considerable exposure of sensitive receptors to substantial pollutant concentrations because proposed project as well as the listed projects have emissions below the screening-level criteria established by the LUEG guidelines for determining significance.

Therefore, the project's construction air pollutant emissions would not expose sensitive receptors to substantial pollutant concentrations and would result in a less than significant impact with mitigation.

d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

- | | |
|---|--|
| ☐ Potentially Significant Impact | ☒ Less than Significant Impact |
| ☐ Less Than Significant With Mitigation Incorporated | ☐ No Impact |

Less Than Significant Impact: 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. According to the San Diego County Guidelines for Determining Significance for Air Quality, land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. Because the project would remedy a grading violation case and no new use types or structures are proposed, the project does not include any uses identified by the Air Quality Guidelines as being associated with odors. Thus, operation of the proposed project is not expected to result in objectionable odors for residents of the neighboring uses. Potential sources that may emit odors during grading activities include combustion engine equipment, but would not be considered significant due to the highly dispersive nature of diesel exhaust. As odors associated with the project construction would be temporary and intermittent in nature, and dissipate from the source over increasing distance, no significant odors would be expected to affect surrounding receptors. Therefore, impacts would be less than significant.

IV. BIOLOGICAL RESOURCES -- Would the project:

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

- | | |
|--|---|
| ☐ Potentially Significant Impact | ☐ Less than Significant Impact |
| ☒ Less Than Significant With Mitigation Incorporated | ☐ No Impact |

Less Than Significant Impact: Based on an analysis of the County's Geographic Information System (GIS) records, the County's Comprehensive Matrix of Sensitive Species, and a Biological Resource Letter Report dated May 2, 2023, prepared by Pacific Southwest Biological Services, it has been determined that the site, and/or surrounding area, supported native vegetation, namely, granitic southern mixed chaparral prior to the illegal activities. No special status plant species were observed onsite. Three special status wildlife species, Cooper's hawk (County Group 1), red-shouldered hawk (County Group 1), and San Diego black-tailed jackrabbit (County Group 2), were observed onsite. The project resulted in impacts to 0.70 acres of granitic southern mixed chaparral. However, staff has determined that removal of this habitat will not result in substantial adverse effects with the incorporation of mitigation. The proposed mitigation consists of the purchase of 0.70 acres (1:1 ratio) of granitic southern mixed chaparral habitat within a County approved mitigation bank. Therefore, the impact is less than significant with mitigation incorporated.

- 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?

- | | |
|--|---|
| ☐ Potentially Significant Impact | ☐ Less than Significant Impact |
| ☒ Less Than Significant With Mitigation Incorporated | ☐ No Impact |

Less Than Significant Impact: Based on an analysis of the County's Geographic Information System (GIS) records, the County's Comprehensive Matrix of Sensitive Species, and a Biological Resource Letter Report dated May 2, 2023, prepared by Pacific Southwest Biological Services, it has been determined that the proposed project site contained granitic southern mixed chaparral habitat within the project boundaries prior to the illegal activities. Mitigation measures have been incorporated regarding the granitic southern mixed chaparral as described in part (a). Therefore, project impacts to any riparian habitat or sensitive natural community identified in the County of San Diego Multiple Species Conservation Program, County of San Diego Resource Protection Ordinance, Natural Community Conservation Plan, Fish and Wildlife Code, Endangered Species Act, Clean Water Act, or any other local or regional plans, policies, or regulations, are considered less than significant with mitigation incorporated.

- c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

- | | |
|---|---|
| ☐ Potentially Significant Impact | ☐ Less than Significant Impact |
| ☐ Less Than Significant With Mitigation Incorporated | ☒ No Impact |

No Impact: Based on an analysis of the County's Geographic Information System (GIS) records, the County's Comprehensive Matrix of Sensitive Species, and a Biological Resource Letter Report dated May 2, 2023, prepared by Pacific Southwest Biological Services, it has been determined that the proposed project site does not contain any wetlands as defined by Section

404 of the Clean Water Act, including, but not limited to, marsh, vernal pool, stream, lake, river or water of the U.S., that could potentially be impacted through direct removal, filling, hydrological interruption, diversion or obstruction by the proposed development. Therefore, no impacts will occur to wetlands defined by Section 404 of the Clean Water Act and under the jurisdiction of the Army Corps of Engineers.

- d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

☐ Potentially Significant Impact	☒ Less than Significant Impact
☐ Less Than Significant With Mitigation Incorporated	☐ No Impact

Less than Significant Impact: Based on an analysis of the County's Geographic Information System (GIS) records, the County's Comprehensive Matrix of Sensitive Species, and a Biological Resource Letter Report dated May 2, 2023, prepared by Pacific Southwest Biological Services, it has been determined that the site has limited biological value and impedance of the movement of any native resident or migratory fish or wildlife species, the use of an established native resident or migratory wildlife corridors, and the use of native wildlife nursery sites would not be expected as a result of the proposed project due to the adjacent existing development to the west and south. Areas to the north and east of the site would continue to provide for wildlife movement. Therefore, impacts are less than significant.

- e) Would the project 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?

☐ Potentially Significant Impact	☒ Less than Significant Impact
☐ Less Than Significant With Mitigation Incorporated	☐ No Impact

Less Than Significant Impact: Refer to the attached Ordinance Compliance Checklist dated August 6, 2026 for further information on consistency with any adopted Habitat Conservation Plan, Natural Communities Conservation Plan, other approved local, regional or state habitat conservation plan, including, Habitat Management Plans (HMP), Special Area Management Plans (SAMP), or any other local policies or ordinances that protect biological resources including the Multiple Species Conservation Program (MSCP), Biological Mitigation Ordinance, Resource Protection Ordinance (RPO), Habitat Loss Permit (HLP).

V. CULTURAL RESOURCES -- Would the project:

- a) Cause a substantial adverse change in the significance of a historical resource pursuant to 15064.5?

☐ Potentially Significant Impact	☐ Less than Significant Impact
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☐ Less Than Significant With Mitigation Incorporated ☒ No Impact

No Impact: Based on an analysis of County of San Diego archaeology resource files, historic records, maps, and aerial photographs by County of San Diego senior adjunct archaeologist, Donna Beddow, it has been determined that the project site does not contain any historical resources. Therefore, the project would not result in impacts to historical resources.

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to 15064.5?

☐ Potentially Significant Impact ☐ Less than Significant Impact
☒ Less Than Significant With Mitigation Incorporated ☐ No Impact

Less Than Significant With Mitigation Incorporated:

Based on an analysis of County of San Diego archaeology resource files, archaeological records, maps, and aerial photographs by County of San Diego senior adjunct archaeologist, Donna Beddow, it has been determined that the project site has been surveyed and cultural resources are present within the subject parcel and in the surrounding area. This project is a grading permit to rectify grading that has occurred without benefit of permit. The location of previously identified resources is outside of the area where unpermitted grading has occurred. The approval for Tentative Parcel Map, PDS2004-3200-20846 required a Grading Monitoring Program (condition C.4). The required Grading Monitoring Program was not implemented as required under Tentative Parcel Map, PDS2004-3200-20846. As such, a Cultural Impact Fee is required, and payment must be completed prior to approval of Grading Permit, PDS2018-LDGRMN-20216. No additional ground disturbance is proposed under this Grading Permit.

c) Disturb any human remains, including those interred outside of *dedicated* cemeteries?

☐ Potentially Significant Impact ☐ Less than Significant Impact
☐ Less Than Significant With Mitigation Incorporated ☒ No Impact

No Impact: Based on an analysis of records and a survey of the property by a County of San Diego senior adjunct archaeologist, Donna Beddow, it has been determined that the project will not disturb any human remains because the project site does not include a formal cemetery or any archaeological resources that might contain interred human remains. The project site has been previously surveyed (Guerrero & Gallegos, 2005), and no resources or human remains are located within the area of unpermitted grading.

VI. ENERGY. Would the project:

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

- | | |
|---|--|
| ☐ Potentially Significant Impact | ☒ Less than Significant Impact |
| ☐ Less Than Significant With Mitigation Incorporated | ☐ No Impact |

Less Than Significant Impact: The proposed project involved remedial grading on a previously disturbed site. Energy use would have occurred only during the temporary construction period through the use of diesel- and gasoline-powered equipment and vehicles. However, all grading and earthwork have already been completed, and no additional construction or soil movement is proposed. Because construction activities were limited in duration (approximately 9 to 12 weeks) and are now finished, no ongoing or future consumption of energy resources would occur.

During the grading phase, equipment operated in compliance with applicable local, state, and federal regulations, including USEPA and California Air Resources Board engine standards and idling restrictions, which reduce fuel consumption and improve efficiency. Energy demand associated with grading activities was temporary, limited, and did not require additional energy capacity or result in substantial increases in electricity or fuel use. Minor electricity use for dust control water conveyance and limited equipment power was also temporary. Natural gas was not required, and any incidental use would have been negligible.

Because all construction activities have concluded and no further work is planned, the project no longer consumes energy and would not result in any future energy impacts. Therefore, the project would not have a significant impact on energy resources.

- b) **Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?**

- | | |
|---|--|
| ☐ Potentially Significant Impact | ☒ Less than Significant Impact |
| ☐ Less Than Significant With Mitigation Incorporated | ☐ No Impact |

Less than Significant Impact: Relevant plans pertaining to energy efficiency include the 2019 California Energy Efficiency Action Plan. Temporary energy use associated with the past grading phase complied with applicable USEPA and CARB regulations, including engine emission standards and idling restrictions, which reduced short-term fuel consumption to the extent feasible. The project consists solely of as-built remedial grading on a previously disturbed site. All grading and earthwork have been completed, and no additional construction or operational components are proposed. Because the project does not include any structures, facilities, or activities that would result in ongoing energy use, it has no potential to conflict with or obstruct

implementation of any state or local renewable energy or energy-efficiency plan. Temporary construction energy demand has ceased and does not represent a continuing load.

Therefore, the project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. Impacts would be less than significant.

VII. GEOLOGY AND SOILS -- Would the project:

a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

- i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

☐ Potentially Significant Impact	☐ Less than Significant Impact
☐ Less Than Significant With Mitigation Incorporated	☒ No Impact

No Impact: The project site is not located on or in proximity to any known active or potentially active fault traces. The project is not located in a fault rupture hazard zone identified by the Alquist Priolo Earthquake Fault Zoning Act, Special Publication 42, and Revised 1997, Fault Rupture Hazards Zones in California.

- ii. Strong seismic ground shaking?

☐ Potentially Significant Impact	☐ Less than Significant Impact
☐ Less Than Significant With Mitigation Incorporated	☒ No Impact

No Impact: The Uniform Building Code (UBC) and the California Building Code (CBC) classifies all San Diego County with the highest seismic zone criteria, Zone 4. However, the project is not located within 5 kilometers of the centerline of a known active-fault zone as defined within the Uniform Building Code's Maps of Known Active Fault Near-Source Zones in California. 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. The project consists solely of as-built remedial grading on a previously disturbed site. All grading and earthwork have been completed, and no additional construction or operational components are proposed. The approved grading plan also ensures that the as-built conditions will be corrected, as necessary, to comply with all applicable stormwater management and slope-stabilization requirements. Because the project does not include any structures, facilities, or activities that would result in ongoing energy use, it has no potential to conflict with or obstruct implementation of any state or local renewable energy or energy-efficiency plan. Therefore, compliance with the Grading Plan, Grading Ordinance, California Building Code, and the County Code would ensure the project would not result in a potentially significant impact from the exposure of people or structures to potential adverse

effects from strong seismic ground shaking. In addition, the project will have to conform to the Seismic Requirements Chapter 16 Section 162- Earthquake Design as outlined within the California Building Code. Section 162 requires a soils compaction report with proposed foundation recommendations to be approved by a County Structural Engineer before the issuance of a building or grading permit. Therefore, there will be no impact from the exposure of people or structures to potential adverse effects from strong seismic ground shaking as a result of this project.

iii. Seismic-related ground failure, including liquefaction?

- | | |
|---|---|
| ☐ Potentially Significant Impact | ☐ Less than Significant Impact |
| ☐ Less Than Significant With Mitigation Incorporated | ☒ No Impact |

No Impact: Liquefaction typically occurs when a site is located in a zone with seismic activity, onsite soils are cohesionless (such as sand or gravel), groundwater is encountered within 50 feet of the surface, and soil relative densities are less than about 70 percent. The project site is not within a “Potential Liquefaction Area” as identified in the County Guidelines for Determining Significance for Geologic Hazards. The site is underlain by Cretaceous Plutonic bedrock, which is not susceptible to liquefaction or other forms of seismic-related ground failure. In addition, the site is not located within a mapped liquefaction hazard zone, floodplain, or area underlain by saturated unconsolidated soils that could be susceptible to seismic ground failure. The proposed project consists of remedial grading on a previously disturbed site and would not place development in an area subject to seismic-related ground failure hazards. The approved grading plan also ensures that the as-built conditions will be corrected, as necessary, to comply with all applicable stormwater management and slope-stabilization requirements. Therefore, the project would not expose people or structures to substantial adverse effects associated with seismic-related ground failure, including liquefaction, and no impact would occur.

iv. Landslides?

- | | |
|---|--|
| ☐ Potentially Significant Impact | ☒ Less than Significant Impact |
| ☐ Less Than Significant With Mitigation Incorporated | ☐ No Impact |

Less Than Significant Impact: The site is located within a “Landslide Susceptibility Area” as identified in the County Guidelines for Determining Significance for Geologic Hazards. Landslide Susceptibility Areas were developed based on landslide risk profiles included in the *Multi-Jurisdictional Hazard Mitigation Plan, San Diego, CA* (URS, 2004). Landslide risk areas from this plan were based on data including steep slopes (greater than 25%); soil series data (SANDAG based on USGS 1970s series); soil-slip susceptibility from USGS; and Landslide Hazard Zone Maps (limited to 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% in grade because these soils are slide prone.

b) Would the project result in substantial soil erosion or the loss of topsoil?

- | | |
|---|--|
| ☐ Potentially Significant Impact | ☒ Less than Significant Impact |
| ☐ Less Than Significant With Mitigation Incorporated | ☐ No Impact |

Less Than Significant Impact: According to the Soil Survey of San Diego County, the soils on-site are identified as Cienega-Fallbrook (CnG2 and CnE2), and Visalia Sandy Loam (VaB) that has a soil erodibility rating of "severe" as indicated by the Soil Survey for the San Diego Area, prepared by the US Department of Agriculture, Soil Conservation and Forest Service dated December 1973. However, the project will not result in substantial soil erosion or the loss of topsoil for the following reasons:

- The project will not result in unprotected erodible soils; will not alter existing drainage patterns; is not located in a floodplain, wetland, or significant drainage feature; and will not develop steep slopes.
- The project has prepared a Standard Storm water Management Plan dated June 24, 2019. The plan includes the following Best Management Practices to ensure sediment does not erode from the project site: Silt fence, fiber rolls, street sweeping and vacuuming, storm drain inlet protection, stockpile management, solid waste management, stabilized construction entrance/exit, vehicle and equipment maintenance, desilting basin, gravel bag berm, material delivery and storage, spill prevention and control, concrete waste management, water conservation practices, paving and grinding operations, any minor slopes created incidental to construction and not subject to a major or minor grading permit shall be protected by covering with plastic or tarp prior to a rain event, and shall have vegetative cover reestablished within 180 days of completion of the slope and prior to final building approval.
- The project involves grading. However, the project is required to comply with the San Diego County Code of Regulations, Title 8, Zoning and Land Use Regulations, Division 7, Sections 87.414 (DRAINAGE - EROSION PREVENTION) and 87.417 (PLANTING). Compliance with these regulations minimizes the potential for water and wind erosion.

Due to these factors, it has been found that the project will not result in substantial soil erosion or the loss of topsoil on a project level.

In addition, the project will not contribute to a cumulatively considerable impact because all the of past, present and future projects included on the list of projects that involve grading or land disturbance are required to follow the requirements of the San Diego County Code of Regulations, Title 8, Zoning and Land Use Regulations, Division 7, Sections 87.414 (DRAINAGE - EROSION PREVENTION) and 87.417 (PLANTING); Order 2001-01 (NPDES No. CAS 0108758), adopted by the San Diego Region RWQCB on February 21, 2001; County Watershed Protection, Storm Water Management, and Discharge Control Ordinance (WPO) (Ord. No. 9424); and County Storm water Standards Manual adopted on February 20, 2002, and amended January 10, 2003 (Ordinance No. 9426). Refer to XVII. The project consists solely of as-built remedial grading on a previously disturbed site. All earthwork has been completed, and no additional construction or operational activities are proposed. The approved grading plan will

also ensures that the as-built conditions will be corrected, as necessary, to comply with all applicable stormwater management and slope-stabilization requirements. Mandatory Findings of Significance for a comprehensive list of the projects considered.

- c) Would the project 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?

- | | |
|---|---|
| ☐ Potentially Significant Impact | ☐ Less than Significant Impact |
| ☐ Less Than Significant With Mitigation Incorporated | ☒ No Impact |

No Impact: The project consists of as-built remedial grading on a previously disturbed site. All grading and earthwork activities have been completed, and no additional construction or operational components are proposed. The approved grading plan will also ensure that the as-built conditions will be corrected, as necessary, to comply with all applicable stormwater management and slope-stabilization requirements. The proposed project is consistent with the geological formations underlying the site. For further information refer to VI Geology and Soils, Question a., I-IV listed above.

- d) Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

- | | |
|---|--|
| ☐ Potentially Significant Impact | ☒ Less than Significant Impact |
| ☐ Less Than Significant With Mitigation Incorporated | ☐ No Impact |

Less Than Significant Impact: The project does not contain expansive soils as defined by Table 18-1-B of the Uniform Building Code (1994). The soils on-site are Cienega-Fallbrook (CnG2 and CnE2), and Visalia Sandy Loam (VaB). These soils have a shrink-swell behavior of low and represent no substantial risks to life or property. The project consists solely of as-built remedial grading on a previously disturbed site. All earthwork has been completed, and no additional construction or operational activities are proposed. The approved grading plan also ensures that the as-built conditions will be corrected, as necessary, to comply with all applicable stormwater management and slope-stabilization requirements. Therefore, the project will not create a substantial risk to life or property. This was confirmed by staff review of the Soil Survey for the San Diego Area, prepared by the US Department of Agriculture, Soil Conservation and Forest Service dated December 1973.

- e) Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

- | | |
|---|--|
| ☐ Potentially Significant Impact | ☒ Less than Significant Impact |
|---|--|

- ☐ Less Than Significant With Mitigation Incorporated ☐ No Impact

Less Than Significant Impact: The project consists solely of as-built remedial grading on a previously disturbed site. All earthwork has been completed, and no additional construction or operational activities are proposed. The approved grading plan ensures that the as-built conditions will be corrected, as necessary, to comply with all applicable stormwater management and slope-stabilization requirements. The project site would discharge domestic wastewater to on-site wastewater systems (OSWS), or septic systems. Any future use relying on these systems must conform to applicable Regional Water Quality Control Board (RWQCB) requirements, including the Regional Basin Plan and the California Water Code. Under California Water Code Section 13282, RWQCBs may authorize local public agencies to issue OSWS permits to ensure that systems are properly designed, located, sized, constructed, and maintained. The RWQCBs with jurisdiction over San Diego County have authorized the County of San Diego Department of Environmental Health to issue such permits. Based on this process, the project site has soils capable of supporting septic tanks or alternative wastewater systems, as verified by the appropriate local agency. The project will also comply with the San Diego County Code of Regulatory Ordinances, Title 6, Division 8, Chapter 3, governing septic tanks and seepage pits.

- f) Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

- ☐ Potentially Significant Impact ☐ Less than Significant Impact
☐ Less Than Significant With Mitigation Incorporated ☒ No Impact

Discussion/Explanation: San Diego County has a variety of geologic environments and geologic processes which generally occur in other parts of the state, country, and the world. However, some features stand out as being unique in one way or another within the boundaries of the County.

No Impact: A review of the County's Paleontological Resources Maps indicates that the project is located entirely on plutonic igneous rock and has no potential for producing fossil remains. The site does not contain any unique geologic features that have been listed in the County's Guidelines for Determining Significance for Unique Geology Resources nor does the site support any known geologic characteristics that have the potential to support unique geologic features.

VIII GREENHOUSE GAS EMISSIONS

- a) Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

- ☐ Potentially Significant Impact ☒ Less than Significant Impact
☐ Less Than Significant With Mitigation Incorporated ☐ No Impact

Discussion/Explanation: Greenhouse gas (GHG) emissions result in an increase in the earth's average surface temperature commonly referred to as global warming. This rise in global temperature is associated with long-term changes in precipitation, temperature, wind patterns, and other elements of the earth's climate system, known as climate change. These changes are now broadly attributed to GHG emissions, particularly those emissions that result from the human production and use of fossil fuels. GHGs include carbon dioxide, methane, halocarbons, and nitrous oxide, among others. Human induced GHG emissions are a result of energy production and consumption and personal vehicle use, among other sources.

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

An individual project's GHG emissions would generally not result in direct impacts under CEQA, as the climate change issue is global in nature; however, an individual project could be found to contribute to a potentially significant cumulative impact. CEQA Guidelines Section 15130(f) states that an EIR shall analyze GHG emissions resulting from a proposed project when the incremental contribution of those emissions may be cumulatively considerable.

Less than Significant Impact: The project involves 0.78 acres of remedial grading to resolve an existing code-violation case through a minor Grading Permit. All grading and earthwork have been completed, and no additional construction or site work is proposed. Typical grading of this scale requires approximately 9 to 12 weeks to complete, and the as-built grading indicates no import or export of material. Accordingly, project-related GHG emissions were limited to short-term construction equipment use (e.g., tractors, loaders, backhoes, dozers, excavators, blades, and concrete trucks). No operational emissions beyond existing conditions would occur. CalEEMod modeling estimates that grading activities generated approximately 12 metric tons (MT) of CO₂e, representing a minimal level of construction-related GHG emissions. By comparison, construction of 50 single-family homes typically generates about 900 MT CO₂e.

Grading activities are subject to the County of San Diego Grading Ordinance and SDAPCD Rule 55, which require implementation of standard best management practices such as watering and vehicle speed control to minimize dust and diesel emissions. The grading is consistent with the property's existing land use designation and zoning (A70 and A72), which allow residential and agricultural uses. Limited grading is assumed under the County General Plan for such permitted uses.

Given the small project size, short-term duration, and temporary nature of emissions, the project would not result in a substantial contribution to GHG emissions or global climate change. In addition, as noted, the project is a grading plan to rectify an existing code-violation case through. All grading and earthwork have been completed, and no additional construction or site work is proposed. Therefore, impacts would be less than significant.

Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

- | | |
|---|--|
| ☐ Potentially Significant Impact | ☒ Less than Significant Impact |
| ☐ Less Than Significant With Mitigation Incorporated | ☐ No Impact |

Less Than Significant Impact: There are numerous State plans, policies, and regulations adopted to reduce GHG emissions. The principal state plan and policy is Senate Bill (SB) 32 and the California Global Warming Solutions Act of 2006. The quantitative goal of SB 32 is to reduce GHG emissions to 40 percent below 1990 levels by 2030. In 2022, the State passed AB 1279, which declares the State would achieve net-zero GHG emissions by 2045 and would reduce GHG emissions by 85 percent below 1990 levels by 2045. Pursuant to the SB 32 goal and AB 1279, the 2022 Scoping Plan was created to outline goals and measures for the State to achieve the reductions. Additionally, SANDAG adopted San Diego Forward: 2021 Regional Plan in 2021, and the County of San Diego General Plan provides goals and policies to reduce GHG emissions. Therefore, the analysis is based upon the project's consistency with plans and policies adopted for the purposes of reducing GHG emissions and mitigating the effects of climate change, including the CARB 2022 Scoping Plan and SANDAG's 2021 Regional Plan.

2022 Scoping Plan

The latest iteration of the Scoping Plan is the 2022 Scoping Plan, which focuses on outcomes needed to achieve carbon neutrality by assessing paths for clean technology, energy deployment, natural and working lands, and others, and is designed to meet the state's longterm climate objectives and support a range of economic, environmental, energy security, environmental justice, and public health priorities. The 2022 Scoping Plan's strategies that apply to the proposed project include the following:

- Reducing fossil fuel use, energy demand and VMT;
- Building decarbonization; and
- Maximizing recycling and diversion from landfills.

San Diego Forward: 2021 Regional Plan

The 2021 Regional Plan provides a framework for meeting goals with coordinated land use and transportation planning strategies. Implementation actions related to projects, policies and programs would confirm SANDAG's commitment to fully realizing the strategies in the 2021 Regional Plan. The Sustainable Communities Strategy (SCS) envisions a transportation system that is fast, fair, and clean, as well as a region that is resilient to economic and environmental changes. The 2021 Regional Plan policies are built around three core strategies:

- Invest In a Reimagined Transportation System. Build a network and fund services that include multimodal roadways; an expanded network of fast, frequent, and low-cost transit;

- 21st century technology that manages the entire transportation system and connects people to on-demand services; and zero-emissions options for vehicles and micromobility.
- Incentivize Sustainable Growth and Development. Collaborate with local jurisdictions and fund programs to accelerate housing production while also addressing equity, climate resilience, and mobility.
 - Implement Innovative Demand and System Management. Reduce solo driving and congestion through increased remote work, carsharing, vanpooling, pricing strategies and parking management programs that leverage partnerships and technology.

The proposed project would be consistent with these goals through project design that would be consistent with latest California 2022 Energy Code. The proposed project is a grading plan to rectify a grading violation. No use is proposed on the project site.

Through its goals, policies, and land use designations, the County's General Plan aims to reduce Countywide GHG emissions. The project is in accordance with relevant COS (Community Open Space)-14 Sustainable Land Development policies (COS-14.10 Use of low-emission construction vehicles for construction; COS-14.11 Native Vegetation will be replanted with similar genetic vegetative stock at a 3:1 ratio unless otherwise stated). These policies provide direction for individual development projects to reduce GHG emissions and help the County meet its GHG emission reduction targets. Furthermore, the project does not fall within an area where primary opportunities to reduce air quality pollutants and GHG emissions are in effect such as urbanized areas of the County where there are land use patterns that can best support the increased use of transit and pedestrian activities since most GHGs and air pollutants result from mobile source emissions (San Diego County General Plan, Conservation and Open Space Element).

The proposed project would comply with the plans, policies, regulations, and GHG reduction actions/strategies outlined in the 2022 Scoping Plan, 2021 Regional Plan, and the San Diego County General Plan. The project would be consistent with the 2021 Regional Plan since the anticipated residents would be located within the region and would not increase population growth and housing needs. Consistency with the plans, policies, regulations, and GHG reduction actions/strategies would reduce the project's incremental contribution of GHG emissions. Therefore, the proposed project's GHG impacts would be less than significant.

IX. HAZARDS AND HAZARDOUS MATERIALS --

- a) Would the project 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?

- | | |
|---|---|
| ☐ Potentially Significant Impact | ☐ Less than Significant Impact |
| ☐ Less Than Significant With Mitigation Incorporated | ☒ No Impact |

No Impact: The project consists of as-built remedial grading completed to rectify an existing grading-violation case. All grading activities are finished, and no additional construction or site work is proposed. During grading, small quantities of gasoline, diesel, and other petroleum-based products associated with construction equipment were present onsite. These materials have the potential to create temporary, localized soil or water contamination through spills, leaks, or equipment malfunction.

All hazardous materials used during grading were subject to applicable federal, state, and local regulations, including those administered by the California Department of Toxic Substances Control, the U.S. Environmental Protection Agency, and the North County Fire Protection District. Compliance with these requirements ensured that the temporary use, transport, handling, and disposal of hazardous materials during grading did not create significant hazard to the public or the environment. Because all grading has been completed and no further construction or operational activities are proposed, the project would not involve the ongoing routine transport, use, or disposal of hazardous materials beyond existing site conditions. Therefore, the project would not create a significant hazard to the public or the environment. Impacts would be less than significant.

- b) Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

☐ Potentially Significant Impact	☐ Less than Significant Impact
☐ Less Than Significant With Mitigation Incorporated	☒ No Impact

No Impact: The project is not located within one-quarter mile of an existing or proposed school. The nearest school is located about 3.2 miles west of the project site. Therefore, the project will not have any effect on an existing or proposed school.

- c) Would the project 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?

☐ Potentially Significant Impact	☐ Less than Significant Impact
☐ Less Than Significant With Mitigation Incorporated	☒ No Impact

No Impact: Based on a review of available environmental resource information, the project site is not listed on any of the hazardous materials site lists compiled pursuant to Government Code Section 65962.5, nor is it known to have been subject to the release of hazardous substances. The project site is not included in any of the following lists or databases: the State of California Hazardous Waste and Substances sites list compiled pursuant to Government Code Section 65962.5., the San Diego County Hazardous Materials Establishment database, the San Diego County DEH Site Assessment and Mitigation (SAM) Case Listing, the Department of Toxic

Substances Control (DTSC) Site Mitigation and Brownfields Reuse Program Database (“CalSites” Envirostor Database), the Resource Conservation and Recovery Information System (RCRIS) listing, the EPA’s Superfund CERCLIS database or the EPA’s National Priorities List (NPL). 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), is not on or within 1,000 feet of a Formerly Used Defense Site (FUDS), does not contain a leaking Underground Storage Tank, and is not located on a site with the potential for contamination from historic uses such as intensive agriculture, industrial uses, a gas station or vehicle repair shop. Therefore, the project would not create a significant hazard to the public or environment.

- d) Would the project be 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 or excessive noise for people residing or working in the project area?

- | | |
|---|---|
| ☐ Potentially Significant Impact | ☐ Less than Significant Impact |
| ☐ Less Than Significant With Mitigation Incorporated | ☒ No Impact |

No Impact: The proposed project is not located within a Comprehensive Land Use Plan (CLUP) for airports; or within two miles of a public airport. Also, the project does not propose construction of any structure equal to or greater than 150 feet in height, constituting a safety hazard to aircraft and/or operations from an airport or heliport. Therefore, the project will not constitute a safety hazard for people residing or working in the project area.

- e) Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

- | | |
|---|--|
| ☐ Potentially Significant Impact | ☒ Less than Significant Impact |
| ☐ Less Than Significant With Mitigation Incorporated | ☐ No Impact |

The following sections summarize the project’s consistency with applicable emergency response plans or emergency evacuation plans.

- i. OPERATIONAL AREA EMERGENCY PLAN AND MULTI-JURISDICTIONAL HAZARD MITIGATION PLAN:

Less Than Significant Impact: The Operational Area Emergency Plan is a comprehensive emergency plan that defines responsibilities, establishes an emergency organization, defines lines of communications, and is designed to be part of the statewide Standardized Emergency Management System. The Operational Area Emergency Plan provides guidance for emergency planning and requires subsequent plans to be established by each jurisdiction that has responsibilities in a disaster situation. The Multi-Jurisdictional Hazard Mitigation Plan includes

an overview of the risk assessment process, identifies hazards present in the jurisdiction, hazard profiles, and vulnerability assessments. The plan also identifies goals, objectives and actions for each jurisdiction in the County of San Diego, including all cities and the County unincorporated areas. The project will not interfere with this plan because it will not prohibit subsequent plans from being established or prevent the goals and objectives of existing plans from being carried out.

ii. SAN DIEGO COUNTY NUCLEAR POWER STATION EMERGENCY RESPONSE PLAN

No Impact: The San Diego County Nuclear Power Station Emergency Response Plan will not be interfered with by the project due to the location of the project, plant and the specific requirements of the plan. The emergency plan for the San Onofre Nuclear Generating Station includes an emergency planning zone within a 10-mile radius. All land area within 10 miles of the plant is not within the jurisdiction of the unincorporated County and as such a project in the unincorporated area is not expected to interfere with any response or evacuation.

iii. OIL SPILL CONTINGENCY ELEMENT

No Impact: The Oil Spill Contingency Element will not be interfered with because the project is not located along the coastal zone or coastline.

iv. EMERGENCY WATER CONTINGENCIES ANNEX AND ENERGY SHORTAGE RESPONSE PLAN

No Impact: The Emergency Water Contingencies Annex and Energy Shortage Response Plan will not be interfered with because the project does not propose altering major water or energy supply infrastructure, such as the California Aqueduct.

v. DAM EVACUATION PLAN

No Impact: The Dam Evacuation Plan would not be interfered with because no grading is proposed on the portion of the project site that is located within a dam inundation zone. In addition, no sensitive receptors, such as a hospital, day-care facility, school, etc., are proposed as part of the project. Because no structures are proposed and project grading would be located outside the Dam Inundation Zone, no impacts would occur.

f) Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

- | | |
|---|--|
| ☐ Potentially Significant Impact | ☒ Less than Significant Impact |
| ☐ Less Than Significant With Mitigation Incorporated | ☐ No Impact |

Less Than Significant Impact: The project is listed as a high fire hazard severity zone (FHSZ) area but is not located within the Wildland-Urban Interface Zone. However, the project would not

construct any buildings and would only remedy a grading code violation case. The Grading Plan is required to be reviewed and approved by the Fire Authority and as such, would comply with regulations relating to emergency access, water supply, and defensible space specified in the County Fire Code and Consolidated Fire Code. Design considerations have been incorporated into the project, including a minimum 24-foot graded road width for fire access. Based on review of the project by County staff, and through compliance with the County Fire Code and Consolidated Fire Code, impacts would be less than significant.

- g) Would the project 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?

- | | |
|---|---|
| ☐ Potentially Significant Impact | ☐ Less than Significant Impact |
| ☐ Less Than Significant With Mitigation Incorporated | ☒ No Impact |

No Impact: 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 will 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 will not substantially increase current or future resident's exposure to vectors, including mosquitoes, rats or flies.

IX. HYDROLOGY AND WATER QUALITY

- a) Would the project violate any *water quality standards* or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

- | | |
|---|---|
| ☐ Potentially Significant Impact | ☐ Less than Significant Impact |
| ☐ Less Than Significant With Mitigation Incorporated | ☒ No Impact |

No Impact: The project consists solely of as-built remedial grading completed to correct an existing grading-violation case. All earthwork has been completed, and no additional construction or operational activities are proposed. The project does not propose any waste discharges that would require Waste Discharge Requirements, National Pollutant Discharge Elimination System (NPDES) permits, or water quality certification from the San Diego Regional Water Quality Control Board (SDRWQCB). Temporary sources of potential water quality impacts were limited to the completed grading activities, including soil disturbance, materials delivery, and minor construction-related waste generation.

The grading plan will ensure that the as-built conditions will be corrected, as necessary, to comply with applicable stormwater management and slope-stabilization requirements. All construction grading activities are subject to the General Construction Permit, which requires preparation and implementation of a Stormwater Pollution Prevention Plan (SWPPP) and associated Best Management Practices (BMPs). As outlined in the project's Standard

Stormwater Quality Management Plan (SWQMP), BMPs include vegetation stabilization, erosion control on flat areas, energy dissipaters, silt fencing, fiber rolls, gravel and sand bags, storm drain inlet protection, a stabilized construction entrance, materials management, and waste management practices. The project is consistent with the County of San Diego BMP Design Manual, which implements the County Watershed Protection Ordinance (Sections 67.801 et seq.) and the Regional Municipal Separate Storm Sewer System (MS4) Permit (RWQCB Order No. R9-2013-0001, as amended). Compliance with these requirements ensures that appropriate measures are in place to minimize sedimentation, erosion, and pollutant discharge.

Because all grading activities are complete, and the project does not include any new development or operational components that would generate additional stormwater pollutants, the project would not violate any water quality standards or waste discharge requirements. Impacts would be less than significant.

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?

- | | |
|---|--|
| ☐ Potentially Significant Impact | ☒ Less than Significant Impact |
| ☐ Less Than Significant With Mitigation Incorporated | ☐ No Impact |

Less than Significant Impact: The project lies within the Twin Oaks hydrologic subarea of the Carlsbad hydrologic unit and is tributary to waterbodies listed as impaired under Clean Water Act Section 303(d), extending from the Pacific Ocean Shoreline (Batiquitos HSA) to San Marcos Creek. The project does not propose any waste discharges requiring Waste Discharge Requirements, NPDES permits, or water quality certification from the San Diego Regional Water Quality Control Board (SDRWQCB). The project consists solely of as-built remedial grading on a previously disturbed site. All earthwork is complete, and no additional construction or operational activities are proposed. The approved grading plan ensures that the as-built grading will be brought into compliance with applicable stormwater management and slope-stabilization requirements. A Standard Stormwater Quality Management Plan (SWQMP) was prepared for the project and identifies design measures and source-control BMPs to reduce potential stormwater pollutants to the maximum extent practicable. BMPs include vegetation stabilization, fiber rolls (straw wattles), stabilized construction entrance, materials and waste management, permeable surfaces, and biofiltration basins. These BMPs are consistent with regional surface water planning and permitting requirements designed to improve water quality in County watersheds. With implementation of these BMPs, the project would not contribute to cumulative water quality impacts to impaired 303(d) waterbodies.

The project is subject to applicable regional and local stormwater regulations, including RWQCB San Diego Region Order No. R9-2013-0001 (as amended), the San Diego County Watershed Protection Ordinance (Sections 67.801 et seq.), and the County of San Diego BMP Design Manual. These regulations collectively protect water resources, reduce adverse effects from polluted runoff, and ensure compliance with state and federal law. Under the Watershed

Protection Ordinance, the project must prepare and implement stormwater management measures that address pollutant discharge and provide appropriate BMPs.

Because all grading work has been completed, and the project includes BMPs that meet County and regional stormwater requirements, the project would not violate water quality standards, create additional polluted runoff, or contribute to degradation of impaired receiving waters. Therefore, hydrology and water quality impacts would be less than significant.

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?

- | | |
|---|--|
| ☐ Potentially Significant Impact | ☒ Less than Significant Impact |
| ☐ Less Than Significant With Mitigation Incorporated | ☐ No Impact |

Less than Significant Impact: The Regional Water Quality Control Board (RWQCB) establishes water quality objectives to protect the existing and potential beneficial uses of waters within each hydrologic unit in the San Diego Region. The project site is located within the Twin Oaks hydrologic subarea of the Carlsbad hydrologic unit, which supports a range of beneficial uses for inland surface waters, coastal waters, reservoirs, lakes, and groundwater, including municipal and domestic supply; agricultural and industrial supply; hydropower generation; contact and non-contact recreation; warm and cold freshwater habitat; wildlife habitat; commercial and sport fishing; aquaculture; estuarine and marine habitat; migration of aquatic organisms; shellfish harvesting; and habitat for rare, threatened, or endangered species.

The project consists solely of as-built remedial grading on a previously disturbed site. All earthwork is complete, and no additional construction or operational activities are proposed. The approved grading plan ensures that the as-built grading will be brought into compliance with applicable stormwater management and slope-stabilization requirements.

Potential sources of pollutants have been evaluated in the project's Standard Stormwater Quality Management Plan (SWQMP). The SWQMP identifies site design measures, source control BMPs, and permanent post-construction BMPs that would reduce pollutants in stormwater runoff to the maximum extent practicable, such that the project would not cause or contribute to an exceedance of applicable water quality objectives. Measures include use of native, drought-tolerant landscaping that does not require fertilizers or pesticides, and amending disturbed soils to restore infiltration capacity comparable to native soils.

The proposed BMPs are consistent with regional stormwater, surface water, and groundwater planning and permitting requirements established to improve overall watershed water quality in the County. As such, the project would not contribute to degradation of beneficial uses or exceedance of water quality objectives for surface or groundwater resources. Refer to Section X, Hydrology and Water Quality, b), for additional discussion of regional regulatory requirements. Therefore, impacts would be less than significant.

d) Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

- | | |
|---|---|
| ☐ Potentially Significant Impact | ☐ Less than Significant Impact |
| ☐ Less Than Significant With Mitigation Incorporated | ☒ No Impact |

No Impact: The project will obtain its water supply from the Vallecitos Water District that obtains water from surface reservoirs or other imported water sources. The project will not use any groundwater for any purpose, including irrigation, domestic or commercial demands. In addition, the project does not involve operations that would interfere substantially with groundwater recharge including but not limited to the following: the project consists solely of as-built remedial grading on a previously disturbed site. All earthwork is complete, and no additional construction or operational activities are proposed. The approved grading plan ensures that the as-built grading will be brought into compliance with applicable stormwater management and slope-stabilization requirements. In addition, the project does not involve regional diversion of water to another groundwater basin; or diversion or channelization of a stream course or waterway with impervious layers, such as concrete lining or culverts, for substantial distances (e.g. ¼ mile). These activities and operations can substantially affect rates of groundwater recharge. Therefore, no impact to groundwater resources is anticipated.

e) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or through the addition of impervious surface, in a manner which would:

(i) result in substantial erosion or siltration on- or off-site;

- | | |
|---|--|
| ☐ Potentially Significant Impact | ☒ Less than Significant Impact |
| ☐ Less Than Significant With Mitigation Incorporated | ☐ No Impact |

Less Than Significant Impact: The project consists solely of as-built remedial grading on a previously disturbed site. All earthwork is complete, and no additional construction or operational activities are proposed. The approved grading plan ensures that the as-built grading will be brought into compliance with applicable stormwater management and slope-stabilization requirements. As outlined in the Standard SWQMP prepared for the project, the project would implement the following site design measures, source control, and/or permanent post construction pollutant and hydromodification control BMPs to reduce potential pollutants, including sediment from erosion or siltation, from entering stormwater runoff to the maximum extent practicable: permeable surfaces and biofiltration basins. Runoff would be directed to the biofiltration basins at the northern end of the facility and along the access driveway. These measures would control erosion and sedimentation and satisfy waste discharge requirements as required by the Land-Use Planning for New Development and Redevelopment Component of the San Diego MS4 Permit (SDRWQCB Order No. R9-2013-0001), as implemented by the San Diego County Jurisdictional Runoff Management Program and BMP Design Manual. The

Standard SWQMP specifies and describes the implementation process of all BMPs that would address equipment operation and materials management, prevent the erosion process from occurring, and prevent sedimentation. The Department of Public Works would ensure that the Standard SWQMP is implemented as proposed. Due to these factors, the project would not result in significantly increased erosion or sedimentation potential and impacts would be less than significant. For further information on soil erosion, refer to Section VII. Geology and Soils, b).

(ii) Would the project substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;

- | | |
|---|--|
| ☐ Potentially Significant Impact | ☒ Less than Significant Impact |
| ☐ Less Than Significant With Mitigation Incorporated | ☐ No Impact |

Less than Significant Impact: The project consists solely of as-built remedial grading on a previously disturbed site. All earthwork is complete, and no additional construction or operational activities are proposed. The approved grading plan ensures that the as-built grading will be brought into compliance with applicable stormwater management and slope-stabilization requirements. The Hydrology Memorandum prepared for the project analyzes drainage before and after proposed development of the project site, including BMPs required to control runoff rate and quality to ensure that no adverse effects would occur to downgradient neighboring properties, consistent with the County's Hydrology Manual, Hydraulic Design Manual, and BMP Design Manual. The Hydrology Memorandum determined that the proposed grading would:

- Not increase runoff at peak runoff flows, onsite and offsite;
- Maintain drainage patterns at or below pre-developed flow volume and velocity; and
- Retain and treat the 85th percentile storm runoff volume through amended soil and landscaping.

The project site is not currently prone to flooding, and the as-built remedial grading would not substantially alter existing drainage patterns or increase runoff in a manner that would result in on- or off-site flooding under design storm conditions. Therefore, the project would not substantially increase the rate or amount of surface runoff or result in flooding on- or off-site. Impacts would be less than significant.

(iii) Would the project create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or

- | | |
|---|--|
| ☐ Potentially Significant Impact | ☒ Less than Significant Impact |
| ☐ Less Than Significant With Mitigation Incorporated | ☐ No Impact |

Less than Significant Impact: As discussed above in Section X. Hydrology and Water Quality, e(ii), the project would not result in increased peak runoff flows and would retain and treat the required stormwater runoff volume and would not increase peak runoff rates or the off-site 100-year storm flow. Drainage facilities would be designed to convey the design storm without causing on-site flooding. Accordingly, the project would not generate runoff that would exceed the capacity of existing or planned stormwater drainage facilities.

Furthermore, the project consists solely of as-built remedial grading on a previously disturbed site. All earthwork is complete, and no additional construction or operational activities are proposed. The approved grading plan ensures that the as-built grading will be brought into compliance with applicable stormwater management and slope-stabilization requirements.

The project would implement construction and operational BMPs to protect water quality as established in the project's Standard SWQMP prepared for the project and described above in Section X(a) and (b) and would have a less than significant impact with regard to substantial additional sources of polluted runoff. As described in Section X(e)(i) above, the project would not significantly alter established drainage patterns and would actually reduce the amount of runoff from the project site (Appendix H). Therefore, the project would have a less significant impact with respect to creating or contributing runoff water that would exceed the capacity of existing or planned stormwater drainage systems.

(iv) Would the project impede or redirect flood flows?

- | | |
|---|--|
| ☐ Potentially Significant Impact | ☒ Less than Significant Impact |
| ☐ Less Than Significant With Mitigation Incorporated | ☐ No Impact |

Less than Significant Impact: The project consists solely of as-built remedial grading on a previously disturbed site. All earthwork is complete, and no additional construction or operational activities are proposed. The approved grading plan ensures that the as-built grading will be brought into compliance with applicable stormwater management and slope-stabilization requirements. However, as discussed above in Section X. Hydrology and Water Quality, e(ii), runoff would maintain flow at or below pre-development values. Flows would be controlled at the points where existing runoff leaves the property. Therefore, the project would not impede or redirect flows. Impacts would be less than significant.

f) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

- | | |
|---|---|
| ☐ Potentially Significant Impact | ☐ Less than Significant Impact |
| ☐ Less Than Significant With Mitigation Incorporated | ☒ No Impact |

No Impact: The project site is also not located within Federal Emergency Management Agency (FEMA), County Floodplain, or County Floodway flood zones, or located within a tsunami or seiche inundation zone. Therefore, the project would not result in any impacts.

- g) Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

☐ Potentially Significant Impact	☒ Less than Significant Impact
☐ Less Than Significant With Mitigation	
☐ Incorporated	☐ No Impact

Less than Significant Impact: The project consists solely of as-built remedial grading on a previously disturbed site. All earthwork has been completed, and no additional construction or operational activities are proposed. The project would bring the site into compliance with applicable stormwater management and slope stabilization requirements as discussed in Section X, Hydrology and Water Quality. The project site is subject to the San Diego Basin Plan and is not located within a groundwater basin subject to Sustainable Groundwater Management Act (SGMA) or a Groundwater Sustainability Plan. Accordingly, the project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. Therefore, the project would not conflict with or obstruct implementation of a water quality control plan or a sustainable groundwater management plan. Impacts would be less than significant.

XI. LAND USE AND PLANNING

- a) Would the project physically divide an established community?

☐ Potentially Significant Impact	☐ Less than Significant Impact
☐ Less Than Significant With Mitigation	☒ No Impact
☐ Incorporated	

No Impact: The project does not propose the introduction of new infrastructure such major roadways or water supply systems, or utilities to the area. The project would remedy a grading code violation case through a grading permit by stabilizing existing on-site slopes and permitting onsite access. Therefore, the proposed project will not significantly disrupt or divide the established community.

- b) Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

☐ Potentially Significant Impact	☒ Less than Significant Impact
☐ Less Than Significant With Mitigation	☐ No Impact
☐ Incorporated	

Less Than Significant Impact:

The proposed project is a grading plan to remedy a grading code violation case by stabilizing existing slopes and stormwater. The project is a minor grading plan to address the grading violation for a residential parcel, which is consistent with the Limited Agriculture zone (A70). The project involves a balanced cut and fill of 1,207 cubic yards of materials. Surrounding land uses

consist of single-family residences and agricultural uses immediately surrounding the project site. 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.

XII. MINERAL RESOURCES

- a) Would the project 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?

☐ Potentially Significant Impact	☒ Less than Significant Impact
☐ Less Than Significant With Mitigation Incorporated	☐ No Impact

Discussion/Explanation:

Less Than Significant Impact: The project site has been classified by the California Department of Conservation – Division of Mines and Geology as an area of “Potential Mineral Resource Significance” (MRZ-3), but with no active mines. According to the County GIS, the southerly portion of the site is underlain with alluvial land. However, this portion of the site has been previously developed, and no grading is proposed in this location. In addition, the project site is surrounded by developed residential land uses, which would be incompatible with future extraction of mineral resources on the project site. A future mining operation at the project site would likely create a significant impact on neighboring properties for issues such as noise, air quality, traffic, and possibly other impacts. Therefore, implementation of the project would not result in the loss of availability of a known mineral resource that would be of value since the mineral resource extraction would not occur at the site due to incompatible land uses.

- b) Would the project 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?

☐ Potentially Significant Impact	☐ Less than Significant Impact
☐ Less Than Significant With Mitigation Incorporated	☐ No Impact

No Impact: The project consists solely of as-built remedial grading on a previously disturbed site. All earthwork is complete, and no additional construction or operational activities are proposed. The approved grading plan ensures that the as-built grading will be brought into compliance with applicable stormwater management and slope-stabilization requirements. In addition, the project site is not located in an area that has Mineral Resource Zone 2 (MRZ-2) designated lands, nor is it located within 1,300 feet of such lands. According to the County of San Diego General Plan, the project site is located within an MRZ-3 Zone (Resources Potentially Present). However, 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. 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.

XIII. NOISE

- a) Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

- | | |
|---|--|
| ☐ Potentially Significant Impact | ☒ Less than Significant Impact |
| ☐ Less Than Significant With Mitigation Incorporated | ☐ No Impact |

Discussion/Explanation:

Less Than Significant Impact: The project consists solely of as-built remedial grading on a previously disturbed site. All earthwork is complete, and no additional construction or operational activities are proposed. The approved grading plan ensures that the as-built grading will be brought into compliance with applicable stormwater management and slope-stabilization requirements. The proposed grading plan consists of the even cut and fill of 1,207 cubic yards of materials on approximately 40 acres. The project would be consistent with the County of San Diego General Plan, Noise Ordinance, and other applicable noise standards for the following reasons:

General Plan – Noise Element

The County of San Diego General Plan, Noise Element, Tables N-1 and N-2 addresses noise sensitive areas and requires an acoustical study to be prepared for any use that may expose noise sensitive areas to noise in excess of a Community Noise Equivalent Level (CNEL) of 60 decibels (dBA) for single residences (including senior housing, convalescent homes), and 65 dBA CNEL for multi-family residences (including mixed-use commercial/residential). Moreover, if the project is in excess of 60 dBA CNEL or 65 dBA CNEL, modifications must be made to the project to reduce noise levels. Noise sensitive areas include residences, hospitals, schools, libraries, or similar facilities as mentioned within Tables N-1 and N-2. Although existing residences are located approximately 90 feet east of the project site, the project consists solely of remedial grading on a previously disturbed site and does not include new structures, operational uses, or permanent noise generating sources. Construction activities would be temporary and conducted in accordance with the County Noise Ordinance. Accordingly, the project would not expose existing or planned noise sensitive receptors to noise levels that exceed applicable General Plan standards and would be consistent with the General Plan Noise Element. Impact would be less than significant.

Noise Ordinance – Section 36.404

Operational noise associated with the project would be limited because the project consists solely of remedial grading to resolve an existing grading violation and does not introduce new land uses, structures, or permanent noise generating equipment. Non-transportation noise generated by the project would not exceed the standards of the County of San Diego Noise Ordinance (Section 36.404) at or beyond the project's property line because the project would

conform to grading equipment operation pursuant to Section 36.409. Therefore, the project is consistent with the Noise Ordinance Section 36.404 and impacts would be less than significant.

Noise Ordinance – Section 36.409 and Section 36.410

Construction activities associated with the project were limited to remedial grading on a previously disturbed site to correct a grading violation. All earthwork is complete, and no additional construction or operational activities are proposed. The approved grading plan ensures the as-built grading meets applicable stormwater management and slope-stabilization requirements. Because grading activities have concluded, the project would not generate construction noise that could exceed the County of San Diego Noise Ordinance limits in Section 36.409. All grading activities occurred during permitted construction hours, and the limited scope of work would not have required equipment operation exceeding the 75 dB average sound level allowed between 7:00 a.m. and 7:00 p.m. No impulsive noise sources such as blasting or rock crushing were required. Therefore, the project is consistent with Sections 36.409 and 36.410 of the County Noise Ordinance, and construction-related noise impacts would be less than significant.

The project's conformance with the County General Plan Noise Element and the County Noise Ordinance (Sections 36.404 and 36.410) ensures it would not contribute to cumulatively considerable noise impacts. The project would not exceed noise standards applicable to noise-sensitive receptors, nor would it exceed property line or construction noise limits established to protect human health and quality of life. As such, the project would not result in a cumulatively considerable exposure of people to noise in excess of local or regional standards. Therefore, noise impacts would be less than significant.

b) Would the project result in generation of excessive groundborne vibration or groundborne noise levels?

- | | |
|---|--|
| ☐ Potentially Significant Impact | ☒ Less than Significant Impact |
| ☐ Less Than Significant With Mitigation Incorporated | ☐ No Impact |

Less Than Significant Impact: The project does not propose any of the following land uses that can be impacted by groundborne vibration or groundborne noise levels:

1. Buildings where low ambient vibration is essential for interior operation, including research and manufacturing facilities with special vibration constraints.
2. Residences and buildings where people normally sleep including hotels, hospitals, residences, and where low ambient vibration is preferred.
3. Civic and institutional land uses including schools, churches, libraries, other institutions, and quiet office where low ambient vibration is preferred.
4. Concert halls for symphonies or other special use facilities where low ambient vibration is preferred.

In addition, the project consists solely of as-built remedial grading on a previously disturbed site. All earthwork is complete, and no additional construction or operational activities are proposed. The approved grading plan ensures that the as-built grading will be brought into compliance with applicable stormwater management and slope-stabilization requirements. As discussed in Section XIII. Noise, a), grading activities have concluded, therefore, no blasting or rock crushing is anticipated. No impulsive noise sources are expected, and the project would comply with Section 36.410 of the County Noise Ordinance. In addition, the project does not propose any major, new, or expanded infrastructure such as mass transit, highways or major roadways, or intensive extractive industry that could generate excessive groundborne vibration or groundborne noise levels. Potential for vibration and groundborne noise would be minimal and would substantially attenuate with distance such that impacts at sensitive receptors would be less than significant.

Would the project result in a substantial permanent increase in ambient noise levels in the project vicinity above existing levels?

- | | |
|---|--|
| ☐ Potentially Significant Impact | ☒ Less than Significant Impact |
| ☐ Less Than Significant With Mitigation Incorporated | ☐ No Impact |

Less Than Significant Impact: Potential impacts to noise would be less than significant with conformance to the County of San Diego General Plan Noise Element and County of San Diego Noise Ordinance (Section 36-404 and 36.410). The proposed project is a grading plan to rectify a grading violation. There is currently no proposed use for the project site.

Would the project result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

- | | |
|---|--|
| ☐ Potentially Significant Impact | ☒ Less than Significant Impact |
| ☐ Less Than Significant With Mitigation Incorporated | ☐ No Impact |

Less Than Significant: Temporary and periodic increases in ambient noise from grading activities and construction of the project are addressed above in Section XIII(a). Permanent increases in ambient noise from operation of the project are addressed above in Section XIII(c). As indicated in these responses, the project would not result in construction or operational noise above the Impacts would be less than significant.

For a project located within the vicinity of a private airstrip or 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?

- | | |
|---|---|
| ☐ Potentially Significant Impact | ☐ Less than Significant Impact |
|---|---|

- ☐ Less Than Significant With Mitigation Incorporated ☒ No Impact

No Impact: The proposed project is not located within an Airport Land Use Compatibility Plan (ALUCP) for airports or within 2 miles of a public airport or public use airport. Therefore, the project will not expose people residing or working in the project area to excessive airport-related noise levels.

XIV. POPULATION AND HOUSING

Would the project induce substantial unplanned 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)?

- ☐ Potentially Significant Impact ☐ Less than Significant Impact
☐ Less Than Significant With Mitigation Incorporated ☒ No Impact

No Impact: The project consists solely of as-built remedial grading on a previously disturbed site. All earthwork is complete, and no additional construction or operational activities are proposed. The approved grading plan ensures that the as-built grading will be brought into compliance with applicable stormwater management and slope-stabilization requirements. The proposed project will not induce substantial population growth in an area because the project does not propose any physical or regulatory change that would remove a restriction to or encourage population growth in an area including, but limited to the following: new or extended infrastructure or public facilities; new commercial or industrial facilities; large-scale residential development; accelerated conversion of homes to commercial or multi-family use; or regulatory changes including General Plan amendments, specific plan amendments, zone reclassifications, sewer or water annexations; or LAFCO annexation actions.

Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

- ☐ Potentially Significant Impact ☐ Less than Significant Impact
☐ Less Than Significant With Mitigation Incorporated ☒ No Impact

No Impact: The project consists solely of as-built remedial grading on a previously disturbed site. All earthwork has been completed, and no additional construction or operational activities are proposed. The approved grading plan ensures the as-built grading will be brought into compliance with applicable stormwater management and slope-stabilization requirements. The project would not displace any existing people or housing because the project would not demolish any habitable structures and would remedy a grading code violation case. Therefore, no impact would occur.

XV. PUBLIC SERVICES

a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance service ratios, response times or other performance objectives for any of the public services:

- i. Fire protection?
- ii. Police protection?
- iii. Schools?
- iv. Parks?
- v. Other public facilities?

☐ Potentially Significant Impact	☒ Less than Significant Impact
☐ Less Than Significant With Mitigation Incorporated	☐ No Impact

Less Than Significant Impact: The project would remedy a grading code violation case and does not support the construction of any structures, or new use types. The project would not result in the need for significantly altered public services or facilities including, but not limited to, fire protection facilities, sheriff facilities, schools, or parks in order to maintain acceptable service ratios, response times, or other performance service ratios or objectives for any public services. Therefore, the project would not have an adverse physical effect on the environment because the project does not require new or significantly altered services or facilities to be constructed. Impacts would be less than significant.

XVI. RECREATION

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?

☐ Potentially Significant Impact	☐ Less than Significant Impact
☐ Less Than Significant With Mitigation Incorporated	☒ No Impact

Discussion/Explanation:

No Impact: The project consists solely of as-built remedial grading on a previously disturbed site. All earthwork is complete, and no additional construction or operational activities are proposed. The approved grading plan ensures that the as-built grading will be brought into compliance with applicable stormwater management and slope-stabilization requirements. The project does not propose any residential use, included but not limited to a residential subdivision, mobile home park, or construction for a single-family residence that may increase the use of existing neighborhood and regional parks or other recreational facilities in the vicinity. Therefore, no impacts would occur from the project.

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?

- | | |
|---|---|
| ☐ Potentially Significant Impact | ☐ Less than Significant Impact |
| ☐ Less Than Significant With Mitigation Incorporated | ☒ No Impact |

Discussion/Explanation:

No Impact: The project does not include recreational facilities or require the construction or expansion of recreational facilities. Therefore, the construction or expansion of recreational facilities cannot have an adverse physical effect on the environment.

XVII. TRANSPORTATION -- Would the project:

a) Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

- | | |
|---|--|
| ☐ Potentially Significant Impact | ☒ Less than Significant Impact |
| ☐ Less Than Significant With Mitigation Incorporated | ☐ No Impact |

Discussion/Explanation: The County of San Diego Guidelines for Determining Significance for Traffic and Transportation (Guidelines) establish measures of effectiveness for the performance of the circulation system. These Guidelines incorporate standards from the County of San Diego Public Road Standards and Mobility Element, the County of San Diego Transportation Impact Fee Program and the Congestion Management Program.

Less Than Significant Impact: The project consists solely of as-built remedial grading on a previously disturbed site. All earthwork has been completed, and no additional construction or operational activities are proposed. The approved grading plan ensures the as-built grading will be brought into compliance with applicable stormwater management and slope-stabilization requirements. The project involves a balanced cut and fill of 1,207 cubic yards of materials. The project would not have a direct impact related to a conflict with any plans, ordinances, or policies addressing the circulation system. Project trips, or average daily trips (ADTs), associated with grading is estimated to include between 8 and 44 ADT for workers depending on the construction phase. Given that construction worker trips would be temporary and would be dispersed along different routes based on the origin of the trips, construction worker commuting is not expected to have a significant effect on the capacity of the transportation system.

Operationally, the project does not involve any additional use types or structures. Once the grading activities are complete, no onsite land use changes are proposed as compared to existing conditions. The project would not conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including public 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 public transit. In addition, implementation of 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, nor would it generate sufficient travel demand to increase demand for transit, pedestrian, or bicycle facilities. Therefore, the project would not conflict with policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities.

b) Would the project conflict or be consistent with CEQA Guidelines section 15064.3, subdivision (b)?

- | | |
|---|--|
| ☐ Potentially Significant Impact | ☒ Less than Significant Impact |
| ☐ Less Than Significant With Mitigation Incorporated | ☐ No Impact |

Discussion/Explanation: The County of San Diego's Transportation Study Guidelines (TSG) establish thresholds and screening criteria for transportation VMT.

Less Than Significant Impact: Per CEQA Guidelines Section 15064.3, Determining the Significance of Transportation Impacts, land use projects should be evaluated based on vehicle miles traveled (VMT). In accordance with the County's Draft 2022 Transportation Study Guidelines, the requirements to prepare a detailed transportation VMT analysis apply to all land development projects, except those that meet at least one of the screening criteria. A project that meets at least one of the screening criteria below would have a less than significant VMT impact due to project characteristics and/or location:

1. Projects Located in a VMT Efficient Area
2. Projects located in Infill Village Area (in Transit Opportunity Areas and Outside of High/Very High Fire Severity Areas)
3. Small Residential and Employment Projects
4. Projects Located in a Transit Accessible Area
5. Locally Serving Retail/Service Projects
6. Locally Serving Public Facilities and Other Uses
7. Redevelopment Projects with Greater VMT Efficiency
8. Affordable Housing

The project involves grading activities only and is not a land development project; therefore, the project is not required to prepare a detailed VMT analysis, as described in further detail below.

Less than Significant Impact: As discussed above, traffic associated with project would only be during the grading phase. Operationally, the project would not produce any additional traffic or trips as compared to the existing facility and conditions. CEQA Section 15064.3, Determining the Significance of Transportation Impacts, states that for many projects, a qualitative analysis of construction traffic may be appropriate. Since construction traffic is temporary and workers are either travelling to the project jobsite or another jobsite elsewhere, the impact on VMT is considered less than significant. Therefore, the project would not conflict with, and is consistent with, CEQA Guidelines section 15064.3, subdivision (b). Impacts would be less than significant.

c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

- | | |
|---|--|
| ☐ Potentially Significant Impact | ☒ Less than Significant Impact |
| ☐ Less Than Significant With Mitigation Incorporated | ☐ No Impact |

Discussion/Explanation:

Less than Significant Impact: The project consists of a Minor Grading Permit to remediate existing grading code violation and does not propose new land uses, structures, or roadway improvements that would increase long-term traffic or introduce incompatible uses. Temporary construction traffic would be limited to workers and grading equipment using the existing access driveway. The access driveway connecting to Deep Springs Road is designed to accommodate construction vehicles and emergency response vehicles in accordance with County roadway standards. Because the project would not modify roadway geometry, create hazardous design features, or introduce incompatible uses that would substantially increase traffic hazards, impacts would be less than significant.

d) Result in inadequate emergency access?

- | | |
|---|--|
| ☐ Potentially Significant Impact | ☒ Less than Significant Impact |
| ☐ Less Than Significant With Mitigation Incorporated | ☐ No Impact |

Less Than Significant: The project consists solely of as-built remedial grading on a previously disturbed site. All earthwork has been completed, and no additional construction or operational activities are proposed. The project would not generate any traffic volumes that would impede emergency access. The County Fire Authority has reviewed the proposed plans and are required to comply with the County's emergency access requirements per the San Diego County Fire Code and Consolidated Fire Code, including turning radius and maneuverability of large emergency vehicles such as fire trucks and ambulances. Therefore, the project would not result in inadequate emergency access, and impacts would be less than significant.

XVIII. TRIBAL CULTURAL RESOURCES

- a) Would the project 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

- | | |
|---|---|
| ☐ Potentially Significant Impact | ☐ Less than Significant Impact |
| ☐ Less Than Significant With Mitigation Incorporated | ☒ No Impact |

- ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to 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.

- | | |
|---|---|
| ☐ Potentially Significant Impact | ☐ Less than Significant Impact |
| ☐ Less Than Significant With Mitigation Incorporated | ☒ No Impact |

Discussion/Explanation:

No Impact: Pursuant to AB-52, consultation was initiated with culturally affiliated tribes. No tribal cultural resources were identified during consultation. As such, there are no impacts to tribal cultural resources.

XIX. UTILITIES AND SERVICE SYSTEMS

- a) Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

- | | |
|---|---|
| ☐ Potentially Significant Impact | ☐ Less than Significant Impact |
| ☐ Less Than Significant With Mitigation Incorporated | ☒ No Impact |

Discussion/Explanation:

No Impact: The project consists of remedying a grading code violation case and does not support the construction of any structures, or new use types, that would facilitate the need for new facilities. In addition, the project is served by the Vallecitos Water District, and no new or expanded water or wastewater facilities are required for the grading operations. A Standard SWQMP has been prepared for the project which would not result in the relocation or alteration of any onsite stormwater drainage facilities, and the onsite water flow would discharge to the same outlet. Lastly, no natural gas or telecommunications facilities would be required. Therefore, because the project would not require the construction of new or expanded facilities that could cause significant environmental effects, no impacts would occur.

- b) Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

- | | |
|---|--|
| ☐ Potentially Significant Impact | ☒ Less than Significant Impact |
| ☐ Less Than Significant With Mitigation Incorporated | ☐ No Impact |

Less than Significant Impact: The project consists solely of as-built remedial grading on a previously disturbed site. All earthwork has been completed, and no additional construction or operational activities are proposed. Because grading activities have concluded, only minimal water would be needed for short-term dust control and suppression. The project does not involve new construction, expanded uses, or any long-term demand on water resources, and grading activities were temporary.

Therefore, adequate water supplies would be available to serve the project during normal, dry, and multiple-dry years, and no impact to water supply reliability would occur. Impacts would be less than significant.

- c) Would the project 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?

- | | |
|---|---|
| ☐ Potentially Significant Impact | ☐ Less than Significant Impact |
| ☐ Less Than Significant With Mitigation Incorporated | ☒ No Impact |

No Impact: The project consists solely of as-built remedial grading on a previously disturbed site. All earthwork has been completed, and no additional construction or operational activities are proposed. Because grading activities have concluded, only minimal water would be needed for short-term dust control and suppression. The project does not involve new construction, expanded uses, or any long-term demand on water resources, and grading activities were temporary.

The project does not include new or expanded water or wastewater treatment facilities, and no additional wastewater generation would occur as a result of the completed grading. Any future development or use of the site would require separate approval and verification of water and wastewater service availability. Therefore, the project would have sufficient water supplies available during normal, dry, and multiple-dry years and would not require new or expanded water or wastewater treatment infrastructure.

- d) Would the project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

- | | |
|---|--|
| ☐ Potentially Significant Impact | ☒ Less than Significant Impact |
| ☐ Less Than Significant With Mitigation Incorporated | ☐ No Impact |

Less Than Significant Impact: The project includes a Minor Grading Permit to remedy a grading code violation case and does not propose any new structures or use types that would result in long-term operational solid waste generation. In addition, all solid waste facilities, including landfills require solid waste facility permits to operate. In San Diego County, the County Department of Environmental Health, Local Enforcement Agency issues solid waste facility permits with concurrence from the Department of Resources Recycling and Recovery (CalRecycle) under the authority of the Public Resources Code (Sections 44001-44018) and California Code of Regulations Title 27, Division 2, Subdivision 1, Chapter 4 (Section 21440et seq.). There are four, permitted active landfills in San Diego County with remaining capacity. Therefore, there is sufficient existing permitted solid waste capacity to accommodate the project's solid waste disposal needs and the project would not impair the attainment of solid waste reduction goals, and impacts would be less than significant.

e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

- | | |
|---|--|
| ☐ Potentially Significant Impact | ☒ Less than Significant Impact |
| ☐ Less Than Significant With Mitigation Incorporated | ☐ No Impact |

Discussion/Explanation:

Less than Significant Impact: The project consists solely of as-built remedial grading on a previously disturbed site. All earthwork has been completed, and no additional construction or operational activities are proposed. As a result, the project would not generate solid waste. All solid waste facilities, including landfills require solid waste facility permits to operate. Any solid waste generated during grading activities would have been collected and disposed of at a permitted solid waste facility in accordance with applicable federal, state, and local regulations. Accordingly, the project would comply with applicable solid waste management statutes and regulations, and impacts would less significant.

XX. WILDFIRE – If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:

a) Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?

- | | |
|---|--|
| ☐ Potentially Significant Impact | ☒ Less than Significant Impact |
| ☐ Less Than Significant With Mitigation Incorporated | ☐ No Impact |

Less than Significant Impact: The project would be served by the Deer Spring Fire Protection District Station 2, approximately 1.2 miles west of the project site. As described in Section IX. Hazards and Hazardous Materials, e), the project would not substantially impair an adopted emergency response plan or evacuation plan. The project would remedy a grading code violation case, and no additional use types or structures are proposed. Therefore, no additional demand

beyond current conditions is required for emergency response. In addition, project access has been designed in conformance with state law and local regulations. Per Deer Springs Fire Protection District emergency vehicle requirements, the width of the project access road would total 24 feet. Therefore, the project would not substantially impair an adopted emergency response plan or emergency evacuation plan, and impacts would be less than significant.

- b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentration from a wildfire or the uncontrolled spread of a wildfire?

☐ Potentially Significant Impact	☒ Less than Significant Impact
☐ Less Than Significant With Mitigation Incorporated	☐ No Impact

Less than Significant Impact: The project is listed as a high Fire Hazard Severity Zone (FHSZ) but is not located within the Urban-Wildland Interface Zone. The majority of the County is in the high and very high FHSZ. Accordingly, the County has implemented fire safety measures depending on specific factors, such as location, vegetation, etc. The project does not propose any vegetation that would be considered flammable, and is required to meet applicable fire measures, such as fire apparatus access and access road requirements. Additionally, the project would remedy a grading code violation case and does not propose any additional uses or structures. Therefore, the project would not expose project occupants, such as residents, to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire, and impacts would be less than significant.

- c) Would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

☐ Potentially Significant Impact	☒ Less than Significant Impact
☐ Less Than Significant With Mitigation Incorporated	☐ No Impact

Less than Significant Impact: As discussed above, the project would remedy a grading code violation case. The project consists solely of as-built remedial grading on a previously disturbed site. All earthwork has been completed, and no additional construction or operational activities are proposed. Given that the majority of the County is in the high and very high FHSZ, the County has implemented fire safety measures depending on specific factors, such as location, vegetation, etc. Homes near the project site and their compliance with fuel modification requirements lower the fire threat and risk to the proposed project. As part of the grading permit, the existing onsite access would be improved to 24-foot width, consistent with the Deer Springs Fire Protection District emergency vehicle requirements. The improvement would aid in an emergency situation by providing an additional access point for wildfire responders, as well as providing adequate width for the fire apparatus. In addition, the project has been designed to avoid flammable vegetation. Therefore, based on project coordination with County staff,

compliance with the County Fire Code and Consolidated Fire Code, and compliance with the Deer Springs Fire Protection District's requirements, impacts associated with fire risk would be less than significant.

- d) Would the project expose people or structure to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

☐ Potentially Significant Impact	☒ Less than Significant Impact
☐ Less Than Significant With Mitigation Incorporated	☐ No Impact

Less than Significant Impact: As discussed above, the project would remedy an existing grading code violation. The project consists solely of as-built remedial grading on a previously disturbed site, and all earthwork has been completed. No additional construction or operational activities are proposed. The approved grading plan ensures the as-built grading will be brought into compliance with applicable stormwater management and slope-stabilization requirements. As stated in Section X, Hydrology and Water Quality, e(ii), a Hydrology Memorandum evaluated pre- and post-development drainage conditions and required BMPs. The analysis determined that the project site is not currently prone to flooding and that the completed grading would not substantially alter drainage patterns. As a result, the site would not be subject to on-site flooding under design peak-flow conditions.

The project does not propose any additional use types or structures that could increase exposure to geologic or drainage-related hazards. Based on the factors above, the project would not expose people or structures to substantial risks related to downslope or downstream flooding, landslides, post-fire slope instability, or drainage changes. Therefore, impacts would be less than significant.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE:

- a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

☐ Potentially Significant Impact	☐ Less than Significant Impact
☒ Less Than Significant With Mitigation Incorporated	☐ No Impact

Less Than Significant with Mitigation Incorporated: Per the instructions for evaluating environmental impacts in this Initial Study, the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory were

considered in the response to each question in sections IV and V of this form. In addition to project specific impacts, this evaluation considered the projects potential for significant cumulative effects. Resources that have been evaluated as significant would be potentially impacted by the project, particularly Biology. However, mitigation has been included that clearly reduces these effects to a level below significance. This mitigation includes off-site biological mitigation, on-site mitigation for steep slopes and biology, and signage/fencing delineating the proposed open space. As a result of this evaluation, there is no substantial evidence that, after mitigation, significant effects associated with this project would result. Therefore, this project has been determined not to meet this Mandatory Finding of Significance.

- b) Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

- ☐ Potentially Significant Impact ☒ Less than Significant Impact
☐ Less Than Significant With Mitigation Incorporated ☐ No Impact

The following list of past, present and future projects were considered and evaluated as a part of this Initial Study:

PROJECT NAME	PERMIT/MAP NUMBER
CAL02191/SMARC01 WIRELESS	PDS2023-MUP-23-010
CK Enterprises	PDS2019-AD-19-004
Casillas Agr Clearing	PDS2005-3000-05-028
Hanson Fence	PDS2024-AD-24-008
Harmony Grove Village South	PDS2018-TM-5626
HGVS Site Plan for Vesting TM	PDS2018-STP-18-011
La Mesita Ranch Green Waste Recycling	PDS2025-ZAP-25-004
Merriam Ranch Grading	PDS2023-LDGRMN-20387
Mesa Rock Road	PDS2015-MUP-15-017
T.E.R.I., MUP	PDS2002-3300-02-019
Valdivia Farms Agricultural Grading	PDS2026-LDGRMJ-30571
Rimsa TPM 2 lots	PDS2006-3200-21095
Old San Marcos School House	PDS2002-3300-02-027
NS323-01 Turman Residence	PDS2005-3300-05-004
Verizon Deer Springs	PDS2016-MUP-16-011

Per the instructions for evaluating environmental impacts in this Initial Study, the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory were considered in the response to each question in sections IV and V of

this form. In addition to project specific impacts, this evaluation considered the project's potential for significant cumulative effects. As a result of this evaluation, the project was determined to have potential significant effects related to biological resources, cultural resources, and geology and soils. However, mitigation has been included that clearly reduces these effects to a level below significance. This mitigation includes:

- Biological Resources: The applicant shall purchase 0.70 acre of granitic southern mixed chaparral habitat at a County-approved mitigation bank;
- Cultural Resources: Payment of a cultural impact fee for the potential impact to archaeological resources paid to Pala, Pechanga Bands of Indian, and Rincon.

As a result of this evaluation, there is no substantial evidence that, after mitigation, significant effects associated with this project would result. Therefore, this project has been determined not to meet this Mandatory Finding of Significance.

- c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

- | | |
|--|---|
| ☐ Potentially Significant Impact | ☐ Less than Significant Impact |
| ☒ Less Than Significant With Mitigation Incorporated | ☐ No Impact |

Less Than Significant with Mitigation Incorporated: In the evaluation of environmental impacts in this Initial Study, the potential for adverse direct or indirect impacts to human beings were considered in the response to certain questions in sections I. Aesthetics, III. Air Quality, VI. Geology and Soils, VII. Hazards and Hazardous Materials, VIII Hydrology and Water Quality XI. Noise, XII. Population and Housing, and XV. Transportation and Traffic. As a result of this evaluation, there were determined to be potentially significant effects to human beings related to Transportation/Traffic. However, mitigation has been included that clearly reduces these effects to a level below significance. This mitigation includes paying Traffic Impact Fees prior to obtaining a building permit. As a result of this evaluation, there is no substantial evidence that, after mitigation, there are adverse effects to human beings associated with this project. Therefore, this project has been determined not to meet this Mandatory Finding of Significance.

XXI. REFERENCES USED IN THE COMPLETION OF THE INITIAL STUDY CHECKLIST

Appendix A – Biological Resources Report
 Appendix B – Stormwater Best Management Intake Form
 Appendix C – Standard Stormwater Best Management Plan
 Appendix D – Vallecitos Water Service Availability Form

California Air Resources Board (CARB). 2017. California's 2017 Climate Change Scoping Plan. December 14, 2017. https://ww3.arb.ca.gov/cc/scopingplan/scoping_plan_2017.pdf.

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