



County of San Diego

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

Date: March 29, 2019
Project Title: Roetzheim Parcel Map
Record ID: PDS2017-TPM-21255; PDS2017-ER-17-19-003
Plan Area: Jamul/Dulzura Community Plan Area
GP Designation: Semi Rural (SR-2)
Density: N/A
Zoning: A70 (Limited Agricultural)
Min. Lot Size: 2 acres
Special Area Reg.: None
Lot Size: 10.31 acres
Applicant: William Roetzheim – (619) 917-4917
Staff Contact: Denise Russell - (858) 694-2019
Denise.russell@sdcounty.ca.gov

Project Description

Location

The proposed project is located at Jamul Highlands Road and Lyons Valley Road in the Jamul-Dulzura Community Plan Area in the unincorporated County of San Diego. The site is one legal lot, with the following Assessor's Parcel Number (APN): 596-152-04.

Site Description

The 10.31-acre project site is located 3390 Jamul Highlands Road in the Jamul/Dulzura Community Planning area. The site has rolling topography with an elevational range of approximately 125 feet. On-site elevations generally range from approximately 1,345 feet above mean sea level (amsl) in the mid-portion of the project site down to 1,220 feet amsl in both the eastern portion of the site adjacent to Jamul Highlands Road and the north western portion of the site. The site is vacant with no historic evidence of prior use.

Discretionary Actions

The project consists of a Tentative Parcel Map (TPM) for a four-lot subdivision.

Project Description

The project proposes a Tentative Parcel Map to subdivide the property into four legal lots for residential development. Access would be provided by a private driveway connecting to Jamul Highlands Road (County Maintained). Water service would be provided by the Otay Water District and individual on-site wastewater systems (supplemental treatment systems) are proposed. Proposed earthwork quantities for the project consist of 3,700 cubic yards of cut and fill with no export required.

The project site is subject to the Semi-Rural Regional Category and the Semi-Rural (SR-2) Land Use Designation. The Zoning Use Regulation for the site is Limited Agricultural (A70). The project is consistent with the requirements of the General Plan and Zoning Ordinance.

Overview

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

General Plan Update Program EIR

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

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

cumulative environmental impacts, and feasible mitigation measures that could reduce or avoid environmental impacts.

Summary of Findings

The Roetzheim Parcel Map TPM is consistent with the analysis performed for the GPU EIR. Further, the GPU EIR adequately anticipated and described the impacts of the proposed project, identified applicable mitigation measures necessary to reduce project specific impacts, and the project implements these mitigation measures (see [https://www.sandiegocounty.gov/content/dam/sdc/pds/gpupdate/docs/BOS_Aug2011/EIR/FEIR_7.00 - Mitigation Measures 2011.pdf](https://www.sandiegocounty.gov/content/dam/sdc/pds/gpupdate/docs/BOS_Aug2011/EIR/FEIR_7.00_-_Mitigation_Measures_2011.pdf) for complete list of GPU Mitigation Measures).

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

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

1. The project is consistent with the development density established by existing zoning, community plan or general plan policies for which an EIR was certified.

The project would subdivide a 10.31-acre parcel into four (4) parcels for residential use. Residential development is proposed and is therefore consistent with the Limited Agriculture Zoning Designation as well as the Semi-Rural (SR-2) density both established by the General Plan and the certified GPU EIR.

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

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

In addition, as explained further in the 15183 Checklist below, all project impacts were adequately analyzed by the GPU EIR. The project could result in potentially significant impacts to biological, cultural resources, and noise. However, applicable mitigation measures specified within the GPU EIR have been made conditions of approval for this project.

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

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

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

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

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

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

Signature	May 2, 2019
	Date
Denise Russell	Project Manager
Printed Name	Title

CEQA Guidelines §15183 Exemption Checklist

Overview

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

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

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

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

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

Discussion

- 1(a) Scenic vistas are available in the project vicinity from McGinty Mountain. However, the proposed project would not have a substantial adverse effect on a scenic vista for the following reasons: the relatively small size of the proposed project within the viewshed; the project's consistency with existing visual and community character of the region; the similar design of individual structures associated with the project to other structural design seen elsewhere in the vicinity; the relative distance of the project site from the scenic vistas and trails (approximately 3.80 miles from McGinty Mountain); the location of the property within the valley where other development occurs; and the limited nature of views to the property from identified trails.
- 1(b) The project site is not within the viewshed of a State-designated scenic highway. The closest County-designated scenic highways to the project site are Lyons Valley Road, approximately 0.20 miles north and the SR-94, approximately 1.55 miles southwest. Due to vegetation and intervening topography, the site would not be visible from either County-designated scenic highways. The project site also does not support any significant scenic resources that would be lost or modified.
- 1(c) The project would be consistent with existing community character. The project is located within the Jamul/Dulzura Community Plan Area characterized by semi-rural residential uses. Although the visual character of the site would change from existing conditions, it would not change the relative scale of development planning in the area, as the project would be consistent with the semi-rural designation applied to the site within the 2011 GPU.
- 1(d) The Jamul/Dulzura Subregional Plan identifies dark skies as an important rural character of the community. The project's lighting would be required to conform with the County's Light Pollution Code and Zoning Ordinance to prevent spillover onto adjacent properties and to minimize impacts to dark skies. Therefore, the proposed project would not adversely affect day or nighttime views in the area.

Conclusion

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

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

Discussion

- 2(a) The project and surrounding properties do not support any Farmland of Local Importance, Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. Additionally, the site does not support any Important Prime or Statewide Candidate soils pursuant to the County's Guidelines for Determining Significance. Thus, the proposed project would not convert agricultural resources to a non-agricultural use.
- 2(b) The project site is zoned A-70, an agricultural zone. However, the A-70 zone allows for residential use types. The proposed project is consistent with the A-70 zone. Additionally, the project site is not located within a Williamson Act Contract. The nearest Williamson Act Contract is approximately 0.25 miles to the west and is currently not in active operation. Due to distance and topography, the project would not introduce any land use conflicts with the existing agricultural contract. Moreover, there are no existing agricultural operations within a quarter mile radius of the project site. Due to the aforementioned criteria, the project would not conflict with existing zoning for agricultural use or a Williamson Act Contract.
- 2(c) There are no timberland production zones on or near the proposed project site. Therefore, the proposed project would not conflict with any timberland production zones.
- 2(d) The project site is not located near any forest lands. Therefore, the proposed project would not result in the loss or conversion of forest lands.

- 2(e) As indicated in response 2(a), the project site is not located near any important farmlands or active agricultural production areas. Therefore, the proposed project would not result in important farmland or other agricultural resources to a non-agricultural use.

Conclusion

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

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
3. Air Quality – Would the Project:			
a) Conflict with or obstruct implementation of the San Diego Regional Air Quality Strategy (RAQS) or applicable portions of the State Implementation Plan (SIP)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Create objectionable odors affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion

- 3(a) The project proposes development that was anticipated and considered by SANDAG growth projections used in development of the RAQS and SIP. Additionally, the proposed project is allowed under the general plan. The project site is zoned A-70 under which residential uses with a 2-acre minimum would be allowed. As such, the project would not conflict with either the RAQS or the SIP.
- 3(b) In general, air quality impacts from land use projects are the result of emissions from motor vehicles, and from short-term construction activities associated with such projects. The County has established Guidelines for Determining Significance and Report Format and Content Requirements for Air Quality which identifies thresholds under which a project would not be anticipated to generate an air quality impact. The County has established Guidelines for Determining Significance for Air Quality which incorporate the SDAPCD's established significance level thresholds for all new source review (NSR) in SDAPCD Rule 20.2 and Rule 20.3. These SLTs can be used as numeric methods to demonstrate that a project's total emissions (e.g. stationary and fugitive emissions, as well as emissions from mobile sources) would not result in a significant impact to air quality. Since SDAPCD does not have a SLT for emissions of VOCs, the screening level from the South Coast Air

Quality Management District (SCAQMD) for the Coachella Valley (which is more appropriate for the San Diego Air Basin) is used.

Impacts during the construction phase are typically associated with site preparation and grading which particulate matter and diesel exhaust are generated as a result of ground disturbance and heavy-duty equipment operation. No unusual circumstances (e.g., excessive rock blasting, construction phases lasting longer than 12 months) exist for the project under which emissions during another construction phase would generate greater emissions than during site preparation and grading. As established in Section 2.1.1 "Construction Grading Activity Criteria" of the County's *Report Format and Content Requirements* for Air Quality, construction activities are not expected to exceed the emission SLTs if less than 3.5 acres of ground surface material is disturbed in a single day. Due to the project size, it is not expected to disturb greater than 3.5-acres of ground surface material in single day. The project would be required, as conditions of approval, to ensure grading activities do not disturb greater than this amount in a single day, as well as comply with the County's Grading Ordinance and the San Diego Air Pollution Control District (SDAPCD) Rule 55 which requires the implementation of measures that would reduce fugitive dust and diesel exhaust emissions.

During project operation, emissions resulting from residential and commercial developments are primarily related to vehicular emissions and area sources (e.g., natural gas combustion, fireplaces). As established in Section 2.1.3 "Operational Emissions Criteria" of the County's *Report Format and Content Requirements* for Air Quality, the single-family residential project size that would be anticipated to generate air emissions greater than the threshold limit is 300 dwelling units. The project is proposing four dwelling units which would be well below this threshold.

Project construction and operational emissions associated with the residential development are not anticipated to exceed the County's construction and operational SLTs. Therefore, the project would not violate any air quality standard or contribute substantially to an existing or projected air quality violation.

- 3(c) San Diego County is presently in non-attainment for the National and California Ambient Air Quality Standard (NAAQS and CAAQS, respectively) for ozone (O₃). San Diego County is also presently in non-attainment for concentrations of Particulate Matter less than or equal to 10 microns (PM₁₀) and Particulate Matter less than or equal to 2.5 microns (PM_{2.5}) under the CAAQS. O₃ is formed when volatile organic compounds (VOCs) and oxides of nitrogen (NO_x) react in the presence of sunlight. VOC sources include any source that burns fuels (e.g., gasoline, natural gas, wood, oil); solvents; petroleum processing and storage; and pesticides. Sources of PM₁₀ in both urban and rural areas include: motor vehicles, wood burning stoves and fireplaces, dust from construction, landfills, agriculture, wildfires, brush/waste burning, and industrial sources of windblown dust from open lands.

The project would contribute PM₁₀, PM_{2.5}, NO_x, and VOCs emissions from construction/grading activities; however, the incremental increase would not exceed established SLTs (see Question 3(b) above). Additionally, grading activities associated with construction of 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. The project would generate PM₁₀, PM_{2.5}, and NO_x emissions during project operations primarily from mobile sources (i.e.

vehicle trips), and VOCs from area and mobile sources. Operational emissions would not be anticipated to exceed the County's SLTs (see Question 3(b) above).

- 3(d). The project would introduce new residential uses, considered sensitive receptors, to the area. The project site is generally surrounded by other residential uses and open space. There are no identified emissions generating uses in the project vicinity that would expose the proposed residential uses to substantial pollutant concentrations.

The proposed project would also not be considered a point-source of significant emissions. The closest sensitive receptor to the project site is a residential development west of the project. The project would potentially expose this nearby sensitive receptor to pollutants during construction activities. The project would not result in construction activity intensities under which air quality impacts would be anticipated (see Question 3(b) above), and construction activities would be temporary, resulting in a relatively short exposure period. Thus, the project would not expose existing sensitive receptors to excessive levels of air pollutants.

- 3(e) The project could produce objectionable odors during construction from paving, painting, and equipment operation; however, these substances, if present at all, would be minimal and temporary. The operation of residential uses are not associated with typical odor generating uses. Subsequently, no significant air quality odor impacts are expected to affect surrounding receptors. Therefore, the proposed project would not create objectionable odors that would affect a substantial number of people. Moreover, the effects of objectionable odors are localized to the immediate surrounding area and would not contribute to a cumulatively considerable odor impact.

Conclusion

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

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
4. Biological Resources – Would the Project:			
a) Have a substantial adverse effect, either directly or through habitat modifications, on any candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh,	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

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

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

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Discussion

- 4(a) Biological resources on the project site were evaluated in a Biological Resources Letter Report prepared by Cummings Environmental, Inc., dated November 19, 2018. The project site totals 10.3 acres and five acres of the site have been cleared in accordance with a grading permit (PDS2015-LDGRMJ-30036) for a single family home. A Certificate of Inclusion was issued for this work. The remainder of the site contains chamise chaparral, coast sage scrub and coast live oak woodland. As a result of this project, impacts will occur to 4.71 acres of chamise chaparral and 0.50 acre of coastal sage scrub. Sensitive wildlife species identified on site include turkey vulture (*Cathartes aura*) and San Diego horned lizard (*Phrynosoma coronatum blainvillii*). No sensitive plant species were identified onsite. The site is located within the MSCP but is not designated as a Pre-approved Mitigation Area (PAMA) or a Biological Resource Core Area (BRCA).

As considered by the GPU EIR, project impacts to sensitive habitat and/or species will be mitigated through ordinance compliance and through implementation of the following mitigation measures: of the offsite purchase of 2.36-acres of chamise chaparral (tier III credits) and the purchase of 0.5-acres of coastal sage scrub (tier II credits) within a BRCA in the MSCP, the dedication of a limited building zone easement to protect and adjacent, offsite open space easement and breeding season avoidance to prevent brushing, clearing, and/or grading between January 1 and August 31. The GPU EIR identified these mitigation measures as Bio-1.5 and Bio-1.6.

- 4(b) Based on the Biological Resources Letter Report, no wetlands or jurisdictional waters were identified onsite. The following sensitive habitats were identified on the site: chamise chaparral and coastal sage scrub. As detailed in response a) above, direct and indirect impacts to sensitive natural communities identified in the RPO, NCCP, Fish and Wildlife Code, and Endangered Species Act are mitigated. As considered by the GPU EIR, project impacts to sensitive habitat and/or species will be mitigated through ordinance compliance and through implementation of the following mitigation measures: of the offsite purchase of 2.36-acres of chamise chaparral (tier III credits) and the purchase of 0.5-acres of coastal sage scrub (tier II credits) within a BRCA in the MSCP, the dedication of a limited building zone easement to protect and adjacent, offsite open space easement and breeding season avoidance to prevent brushing, clearing, and/or grading between January 1 and August 31. The GPU EIR identified these mitigation measures as Bio-1.5 and Bio-1.6.

- 4(c) The proposed project site does not contain any wetlands as defined by Section 404 of the Clean Water Act, therefore, no impacts will occur.

- 4(d) Based on a GIS analysis, the County's Comprehensive Matrix of Sensitive Species, site photos, and a Biological Resources Letter Report, it was determined that the site is not part of a regional linkage/corridor as identified on MSCP maps nor is it in an area considered regionally important for wildlife dispersal. The site does not contribute substantially to local wildlife movement as it lacks connecting vegetation and visual continuity with other potential habitat areas in the general project vicinity. Development surrounds the parcel and a previous grading permit for a single-family residence which resulted in impacts to 5 acres to the site.
- 4(e) The project is consistent with the MSCP and Biological Mitigation Ordinance as demonstrated in the MSCP Conformance Finding dated April 26, 2019. The project will not conflict with the provisions of any adopted Habitat Conservation Plan, Natural Communities Conservation Plan, other approved local, regional or state habitat conservation plan or any other local policies or ordinances that protect biological resources.

Conclusion

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

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

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

Discussion

- 5(a) Based on an analysis of resource files and records, maps, and aerial photographs by County of San Diego staff, it has been determined that there are no impacts to historical resources because they do not occur within the project site.
- 5(b) Based on an analysis of resource files and records, maps, and aerial photographs by County of San Diego staff, it has been determined that the project site is covered in vegetation that prohibits visibility during a pedestrian survey. During previously approved grading, three prehistoric lithic flakes were identified during ground disturbing activities. It was determined that the flakes had been displaced through natural drainage activity and did not have any provenience. Therefore, the resource was determined to be less than significant.

The potential exists for subsurface deposits because of dense vegetative cover on portions of the property which limits ground visibility. Additionally, several recorded archaeological sites are located within the vicinity of the project.

As considered by the GPU EIR, potential impacts to undiscovered, buried, cultural resources will be mitigated through ordinance compliance and through implementation of the following mitigation measures: grading monitoring under the supervision of a County-approved archaeologist and a Native American monitor and conformance with the County's Cultural Resource Guidelines if resources are encountered. The GPU EIR identified these mitigation measures as Cul-2.5.

- 5(c) 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.
- 5(d) A review of the County's Paleontological Resources Maps and data on San Diego County's geologic formations indicates that the project is located on geological formations that have zero potential to contain unique paleontological resources. Therefore, no impacts would occur.
- 5(e) Based on an analysis of resource files and records, maps, and aerial photographs by County of San Diego staff, it has been determined that the project site does not include a formal cemetery or any archaeological resources that might contain interred human remains.

Conclusion

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

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

4. Feasible mitigation measures contained within the GPU EIR will be applied to the project.

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

Discussion

- 6(a)(i) The project site is not located in a fault rupture hazard zone identified by the Alquist-Priolo Earthquake Fault Zoning Act, Special Publication 42, Revised 1997, Fault-Rupture Hazards Zones in California, or located within any other area with substantial evidence of a known fault. Therefore, the proposed project would not expose people or structures to potential adverse effects involving: rupture of a known earthquake fault, strong seismic ground shaking, seismic-related ground failure, liquefaction, and/or landslides.
- 6(a)(ii) To ensure the structural integrity of all buildings and structures, the proposed project must conform to the Seismic Requirements as outlined within the California Building Code. Compliance with the California Building Code and the County Building Code will ensure that the project would not result in a significant impact.
- 6(a)(iii) The project site is not within a "Potential Liquefaction Area" as identified in the County Guidelines for Determining Significance for Geologic Hazards. In addition, the site is not underlain by poor artificial fill or located within a floodplain.
- 6(a)(iv) The project site is not located within a "Landslide Susceptibility Area" as identified in the County Guidelines for Determining Significance for Geologic Hazards.
- 6(b) According to the Soil Survey of San Diego County, the soils on-site are identified as sandy loams which have a moderate soil erodibility rating. However, the project will not result in

substantial soil erosion or the loss of topsoil because the project will be required to comply with the Watershed Protection Ordinance (WPO) and Grading Ordinance which will ensure that the project would not result in any unprotected erodible soils, will not alter existing drainage patterns, and will not develop steep slopes. Additionally, the project will be required to implement Best Management Practices (BMPs) to prevent fugitive sediment.

- 6(c) The project site is not located on or near geological formations that are unstable or would potentially become unstable as a result of the project. Furthermore, the project will be required to comply with the WPO and Grading Ordinance which will ensure that the project would not result in any unprotected erodible soils and will not develop steep slopes that could cause landslides, lateral spreading, subsidence, liquefaction, or collapse.
- 6(d) The project is not underlain by expansive soils as defined within Table 18-I-B of the Uniform Building Code (1994). Additionally, the project will not result in substantial risks to life or property because compliance with the Building Code and implementation of standard engineering techniques would ensure structural safety.
- 6(e) The project will discharge domestic wastewater to on-site wastewater systems (OSWS), which will include individual, appropriately sized septic tanks. The following onsite wastewater treatment system designs for each parcel are based on percolation testing and soil evaluations provided by Gray Maxwell, REHS and Clifford La Monte, RCE. DEH approved the project's use of onsite wastewater treatment systems on January 1, 2019. Therefore, the project has soils capable of adequately supporting the onsite wastewater treatment systems as determined by the authorized local public agency.

Conclusion

As discussed above, the project would not result in any significant impacts to/from geology/soils; therefore, the project would not result in an impact which was not adequately evaluated by the GPU EIR.

Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
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7. Greenhouse Gas Emissions – Would the Project:

a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

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b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

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Discussion

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

The County of San Diego adopted a Climate Action Plan on February 14, 2018 which outlines actions that the County will undertake to meet its greenhouse gas (GHG) emissions reductions targets. Implementation of the CAP requires that new development

projects incorporate more sustainable design standards and implement applicable reduction measures consistent with the CAP. To help streamline this review and determine consistency of proposed projects with the CAP during development review, the County has prepared a CAP Consistency Review Checklist (Checklist). The proposed project would implement all applicable measures identified in the Checklist and would therefore be consistent with the County's Climate Action Plan. Proposed incorporated measures from the CAP Checklist include the following:

- The project will install electric heat pump water heaters in all residential units;
- The project will install new ENERGY STAR appliances and low flow faucets (maximum 1.5 gallons per minute at 60 psi) in all residential units;
- The project will consult with the regional or local water authority to determine if incentives or rebates are available for the installation of rain barrels;
- The project will comply with the Prescriptive Compliance Option within the Water Conservation in Landscaping Ordinance; and
- The project will plant, at a minimum, two trees per dwelling unit, or eight total trees.

The project would be consistent with the County's Climate Action Plan and General Plan assumptions through the implementation of measures identified in the County's CAP Checklist. Therefore, the project would not generate GHG emissions that would have a significant impact on the environment.

- 7(b) The project as proposed would be consistent with the general plan and zoning ordinance, allowing the development of residential units on minimum 2-acre lots. Additionally, the project has demonstrated consistency with the County's Climate Action Plan (see Question 7(a) above). Therefore, the project would be consistent with any applicable plan, policy, or regulation adopted for the purpose of reducing greenhouse gas emissions.

Conclusion

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

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
8. Hazards and Hazardous Materials – Would the Project:			
a) Create a significant hazard to the public or the environment through the routine transport, storage, use, or disposal of hazardous materials or wastes or through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

c) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to 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?

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

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

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

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

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

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Discussion

8(a) The project will not create a significant hazard to the public or the environment because it does not propose the storage, use, transport, emission, or disposal of Hazardous Substances, nor are Hazardous Substances proposed or currently in use in the immediate vicinity. In addition, the project does not propose to demolish any existing structures onsite and therefore would not create a hazard related to the release of asbestos, lead based paint or other hazardous materials from demolition activities.

8(b) The project is not located within one-quarter mile of an existing or proposed school and does not propose to emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste.

8(c) Based on regulatory database search, the project site has not been subject to a 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.

- 8(d) The proposed project is not located within an Airport Land Use Compatibility Plan (ALUCP), an Airport Influence Area, or a Federal Aviation Administration Height Notification Surface. 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.
- 8(e) The proposed project is not within one mile of a private airstrip.
- 8(f)(i) OPERATIONAL AREA EMERGENCY PLAN AND MULTI-JURISDICTIONAL HAZARD MITIGATION PLAN: 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.
- 8(f)(ii) SAN DIEGO COUNTY NUCLEAR POWER STATION EMERGENCY RESPONSE PLAN: The property is not within the San Onofre emergency planning zone.
- 8(f)(iii) OIL SPILL CONTINGENCY ELEMENT: The project is not located along the coastal zone.
- 8(f)(iv) EMERGENCY WATER CONTINGENCIES ANNEX AND ENERGY SHORTAGE RESPONSE PLAN: The project would not alter major water or energy supply infrastructure which could interfere with the plan.
- 8f)(v) DAM EVACUATION PLAN: The project is not located within a dam inundation zone.
- 8(g) The proposed project is located within a Wildland Urban Interface Zone and is adjacent to wildlands that have the potential to support wildland fires. However, pursuant to the Fire Protection Plan, prepared by Charles Weber, dated August 14, 2017, the project will not expose people or structures to a significant risk of loss, injury or death involving wildland fires because the project will comply with the regulations and standards relating to emergency access, water supply, and defensible space required for buildings constructed in Wildland Urban Interface Zones.
- 8(h) The project does not involve or support uses that would allow water to stand for a period of 72 hours or more (e.g. artificial lakes, agricultural ponds). Also, the project does not involve or support uses that will produce or collect animal waste, such as equestrian facilities, agricultural operations (chicken coops, dairies etc.), solid waste facility or other similar uses.

Conclusion

As discussed above, the proposed project would not result in any significant impacts to/from hazards/hazardous materials; therefore, the project would not result in an impact which was not adequately evaluated by the GPU EIR.

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
9. Hydrology and Water Quality – Would the Project:			
a) Violate any waste discharge requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Is the project tributary to an already impaired water body, as listed on the Clean Water Act Section 303(d) list? If so, could the project result in an increase in any pollutant for which the water body is already impaired?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Could the proposed project cause or contribute to an exceedance of applicable surface or groundwater receiving water quality objectives or degradation of beneficial uses?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
g) Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
h) Provide substantial additional sources of polluted runoff?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
i) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map, including County Floodplain Maps?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- | | | | |
|--|--------------------------|--------------------------|--------------------------|
| j) Place within a 100-year flood hazard area structures which would impede or redirect flood flows? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| k) Expose people or structures to a significant risk of loss, injury or death involving flooding? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| l) Expose people or structures to a significant risk of loss, injury or death involving flooding as a result of the failure of a levee or dam? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| m) Inundation by seiche, tsunami, or mudflow? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Discussion

- 9(a) A Priority Development Project Stormwater Quality Management Plan (SWQMP) was prepared for the project by Landmark Engineering Corporation dated February 28, 2019. The SWQMP demonstrates that the project would comply with all requirements of the Watershed Protection Ordinance (WPO). The project will be required to implement site design measures, source control BMPs, and/or treatment control BMPs to reduce potential pollutants to the maximum extent practicable. These measures will enable the project to meet waste discharge requirements as required by the San Diego Municipal Permit (SDRWQCB Order No. [R9-2013-0001](#)), as implemented by the San Diego County Jurisdictional Runoff Management Program (JRMP) and County of San Diego BMP Design Manual.
- 9(b) The project lies in the Dulzura (910.33) hydrologic subarea within the Otay hydrologic unit. According to the Clean Water Act Section 303(d) list, a portion of these watersheds are impaired. Constituents of concern in the Lower Otay Reservoir include ammonia, color, iron, manganese, nitrogen, phosphorus, and pH. The project could contribute to release of some of these pollutants; however, the project will comply with the WPO and implement site design measures, source control BMPs, and treatment control BMPs to prevent a significant increase of pollutants to receiving waters.
- 9(c) As stated in responses 9(a) and 9(b) above, implementation of BMPs and compliance with required ordinances will ensure that project impacts are less than significant.
- 9(d) The project would obtain its water supply from the Otay Water District that obtains water from surface reservoirs or other imported sources. The project would not use any groundwater. In addition, the project does not involve operations that would interfere substantially with groundwater recharge.
- 9(e) A CEQA Hydrology & Hydraulics Study was prepared by Landmark Engineering Corporation dated April 3, 2019 for the proposed project. It was determined that the proposed project would not substantially alter the existing drainage pattern of the project site or area. As outlined in the project's SWQMP, the project will implement source control and/or treatment control BMPs to prevent the erosion process from occurring and prevent sedimentation in any onsite and downstream receiving waters.
- 9(f) A CEQA Hydrology & Hydraulics Study was prepared by Landmark Engineering Corporation dated April 3, 2019 for the proposed project. It was determined that the proposed project would not substantially alter the existing drainage pattern of the project

site or area. As outlined in the project's CEQA Hydrology & Hydraulics Study, the increases in surface runoff due to the proposed increase in impervious area will be mitigated onsite. Therefore, the project will not substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site.

- 9(g) As outlined in the project's CEQA Hydrology & Hydraulics Study, the increases in surface runoff due to the proposed increase in impervious area will be mitigated onsite. Therefore, the project will not create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems.
- 9(h) The project has the potential to generate pollutants; however, site design measures, source control BMPs, and structural BMPs will be employed and maintained such that potential pollutants will be reduced to the maximum extent practicable.
- 9(i) No FEMA mapped floodplains, County-mapped floodplains or drainages with a watershed greater than 25 acres were identified on the project site.
- 9(j) No 100-year flood hazard areas were identified on the project site.
- 9(k) The project site lies outside any identified special flood hazard area.
- 9(l) The project site lies outside a mapped dam inundation area for a major dam/reservoir within San Diego County. In addition, the project is not located immediately downstream of a minor dam that could potentially flood the property.
- 9(m)(i) SEICHE: The project site is not located along the shoreline of a lake or reservoir.
- 9(m)(ii) TSUNAMI: The project site is not located in a tsunami hazard zone.
- 9(m)(iii) MUDFLOW: Mudflow is type of landslide. See response to question 6(a)(iv).

Conclusion

As discussed above, the project would not result in any significant impacts to/from hydrology/water quality; therefore, the project would not result in an impact which was not adequately evaluated by the GPU EIR.

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
10. Land Use and Planning – Would the Project:			
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion

- 10(a) The project does not propose the introduction of new infrastructure such as major roadways, water supply systems, or utilities to the area. Additionally, the site is consistent

with surrounding use types of rural residential lots. Moreover, built-out of the site was anticipated in the GPU EIR. Therefore, the proposed project would not physically divide an established community.

- 10(b) The proposed project would subdivide a 10.31-acre lot into four parcels for residential development. The residential use types and density are consistent with the County General Plan Semi-Rural Designation and Regional Category, Jamul-Dulzura Community Plan, and with the County Zoning Ordinance. Therefore, the project would not conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect, including policies of the General Plan and Community Plan.

Conclusion

As discussed above, the project would not result in any significant impacts to land use/planning; therefore, the project would not result in an impact which was not adequately evaluated by the GPU EIR.

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
11. Mineral Resources – Would the Project:			
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
11(a) The project site has been classified by the California Department of Conservation Division of Mines and Geology as “Resources Potentially Present” (MRZ-3). However, the project site is surrounded by residential development which is incompatible to future extraction of mineral resources on the project site. A future mining operation at the project site would likely create a significant impact to neighboring properties for issues such as noise, air quality, traffic, and possibly other impacts. Therefore, the project would not result in the loss of a known mineral resource because the resource has already been lost due to incompatible land uses.			
11(b) The project site is not located in an Extractive Use Zone (S-82), nor does it have an Impact Sensitive Land Use Designation (24) with an Extractive Land Use Overlay (25). Therefore, the proposed project would not result in the loss of a locally-important mineral resource recovery site.			

Conclusion

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

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

Discussion

- 12(a) The area surrounding the project site consists of noise sensitive land uses that are zoned Rural Residential (RR) and Limited Agriculture (A70). The project will not expose people to potentially significant noise levels that exceed the allowable limits of the General Plan, Noise Ordinance, or other applicable standards for the following reasons:

General Plan – Noise Element

Policy 4b addresses noise sensitive areas and requires projects to comply with a Community Noise Equivalent Level (CNEL) of 60 decibels (dBA). Projects which could produce noise in excess of 60 dB(A) are required to incorporate design measures or mitigation as necessary to comply with the Noise Element. Based on a review of the County's noise contour maps, the project is not expected to expose existing or planned noise sensitive areas to noise in excess of 60 dB(A).

Noise Ordinance – Section 36-404

Non-transportation noise generated by the project is not expected to exceed the standards of the Noise Ordinance at or beyond the project's property line. The site is zoned A70 that has a one-hour average sound limit of 50 dBA daytime and 45 dBA nighttime. The adjacent properties are zoned RR and A70. The project does not involve any noise producing equipment that would exceed applicable noise levels at the adjoining property line.

Noise Ordinance – Section 36-408 & 36-409

The project will not generate construction noise in excess of Noise Ordinance standards. Construction operations will occur only during permitted hours of operation. Also, it is not anticipated that the project will operate construction equipment in excess of an average sound level of 75 dBA between the hours of 7 AM and 7 PM.

- 12(b) The project proposes residential uses which are sensitive to low ambient vibration. However, the residences would be setback more than 600 feet from any public road or transit Right-of-Way with projected noise contours of 65 dB or more; any property line for parcels zoned industrial or extractive use; or any permitted extractive uses. A setback of 600 feet ensures that the operations would not be impacted by groundborne vibration or groundborne noise levels (Harris, Miller Miller and Hanson Inc., Transit Noise and Vibration Impact Assessment 1995).
- 12(c) As indicated in the response listed under Section 12(a), the project would not expose existing or planned noise sensitive areas in the vicinity to a substantial permanent increase in noise levels that exceed the allowable limits of any applicable noise standards. Also, the project is not expected to expose existing or planned noise sensitive areas to noise 10 dB CNEL over existing ambient noise levels.
- 12(d) The project does not involve any operational uses that may create substantial temporary or periodic increases in ambient noise levels in the project vicinity. Also, general construction noise is not expected to exceed the construction noise limits of the Noise Ordinance. Construction operations will occur only during permitted hours of operation. Also, the project will not operate construction equipment in excess of 75 dB for more than an 8 hours during a 24 hour period.
- 12(e) The 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.
- 12(f) The project is not located within a one-mile vicinity of a private airstrip.

Conclusion

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

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

c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

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Discussion

13(a) The 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.

13(b) The project will not displace existing housing.

13(c) The project site does not contain existing residences and would therefore not displace a substantial number of people.

Conclusion

As discussed above, the project would result in less than significant impacts to populations/housing; therefore, the project would not result in an impact which was not adequately evaluated by the GPU EIR.

Significant
Project
Impact

Impact not
identified by
GPU EIR

Substantial
New
Information

14. Public Services – Would the Project:

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

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Discussion

14(a) Based on the project's service availability forms, the project would not result in the need for significantly altered services or facilities.

Conclusion

As concluded above, the project would not result in any significant impacts to public services; therefore, the project would not result in an impact which was not adequately evaluated by the GPU EIR.

Significant
Project
Impact

Impact not
identified by
GPU EIR

Substantial
New
Information

15. Recreation – Would the Project:

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

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b) Does the project include recreational facilities or require the construction or expansion of recreational facilities,

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which might have an adverse physical effect on the environment?

Discussion

15(a) The project would incrementally increase the use of existing parks and other recreational facilities; however, the project will be required to pay fees or dedicate land for local parks pursuant to the Park Land Dedication Ordinance (PLDO). The Park Land Dedication Ordinance (PLDO) is the mechanism that enables the funding or dedication of local parkland in the County.

15(b) The project does not include recreational facilities or require the construction or expansion of recreational facilities that could have a potential adverse effect on the environment.

Conclusion

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

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

Discussion

- 16(a) The project will result in an additional 48 ADTs. However, the project will not conflict with any established performance measures because the project trips do not exceed the thresholds established by County guidelines. As identified in the County's Guidelines for Determining Significance for Traffic and Transportation, the project trips would not result in a substantial increase in the number of vehicle trips, volume of capacity ratio on roads, or congestion at intersections in relation to existing conditions. In addition, the project would not conflict with policies related to non-motorized travel such as mass transit, pedestrian or bicycle facilities. Therefore, the project would not have a direct impact related to a conflict with policies establishing measures of the effectiveness for the performance of the circulation system.
- 16(b) The additional ADTs from the project do not exceed the 2400 trips (or 200 peak hour trips) required for study under the region's Congestion Management Program as developed by SANDAG. The project would not conflict with an applicable congestion management program or other standards established by the County Congestion Management agency for designated roads or highways
- 16(c) The proposed project is located outside of an Airport Influence Area and is not located within two miles of a public or public use airport; therefore, the project will not result in a change in air traffic patterns.
- 16(d) The proposed project will not alter traffic patterns, roadway design, place incompatible uses (e.g., farm equipment) on existing roadways, or create curves, slopes or walls which would impede adequate sight distance on a road.
- 16(e) The San Diego County Fire Authority has reviewed the project and its Fire Protection Plan and have determined that there is adequate emergency fire access.
- 16(f) The project will not result in the construction of any road improvements or new road design features that would interfere with the provision of public transit, bicycle or pedestrian facilities. In addition, the project does not generate sufficient travel demand to increase demand for transit, pedestrian or bicycle facilities.

Conclusion

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

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
17. Utilities and Service Systems – Would the Project:			
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

Discussion

- 17(a) The project will discharge domestic wastewater to on-site wastewater systems (OSWS), which will include individual, appropriately sized septic tanks. The following onsite wastewater treatment system designs for each parcel are based on percolation testing and soil evaluations provided by Gray Maxwell, REHS and Clifford La Monte, RCE. DEH approved the project's use of onsite wastewater treatment systems on January 1, 2019. Therefore, the project has soils capable of adequately supporting the onsite wastewater treatment systems as determined by the authorized local public agency.
- 17(b) The project does not involve new water and wastewater pipeline extensions.
- 17(c) The project involves new storm water drainage facilities. However, these extensions will not result in additional adverse physical effects beyond those already identified in other sections of this environmental analysis.
- 17(d) A Service Availability Letter from the Otay Municipal Water District has been provided which indicates that there is adequate water to serve the project.
- 17(e) The project proposes the use of individual, appropriately sized septic tanks and that have been reviewed and approved by the Department of Environmental Health. Therefore, the proposed project will not interfere with any wastewater treatment provider's service capacity.
- 17(f) Implementation of the project would generate solid waste. All solid waste facilities, including landfills require solid waste facility permits to operate. There are five, permitted active landfills in San Diego County with remaining capacity to adequately serve the project.
- 17(g) The project would deposit all solid waste at a permitted solid waste facility. Therefore, the proposed project would comply with federal, state, and local statutes and regulations related to solid waste.

Conclusion

As discussed above, the project would not result in any significant impacts to utilities and service systems; therefore, the project would not result in an impact which was not adequately evaluated by the GPU EIR.

Attachments:

Appendix A – References

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

Appendix A

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

Blackhawk Environmental, Kris Alberts (February 18, 2019). Biological Resources Letter Report, Jamul Commercial, PDS2018-MUP-18-008 and PDS2018-TPM-21262.

C.W. La Monte Company Inc., Clifford W. La Monte (April 5, 2018). Geotechnical Investigation and Preliminary Infiltration Study, Proposed Commercial Development Jefferson Road Between Olive Vista Drive and Campo Road Jamul, California.

Earth Strata Geotechnical Services, Inc., William Doyle (June 28, 2018). Phase I Environmental Site Assessment of Vacant Property, Assessor's Parcel Number APN 596-071-60-00, Jamul, CA 91935.

Firewise 2000, Inc., Ronald J. Woychak (February 2019). Fire Protection Plan for Jamul Commercial MUP-18-008, 3018 Jefferson Road, Jamul, CA 91935.

Heritage Resources, Sue A. Wade (July 16, 2018). Cultural Resources Survey for the Jamul Commercial Project (County # PDS2018-MUP-18-008), Jamul California.

Ldn Consulting, Inc., Jeremy Loudon (July 19, 2018). Noise Assessment for Jamul Commercial Development, Jamul, CA.

Ldn Consulting, Inc., Jeremy Loudon (February 2019). Air Quality Assessment for Jamul Commercial Development, Jamul, CA.

Ldn Consulting, Inc., Jeremy Loudon (February 2019). Global Climate Change – Jamul Commercial, Jamul, CA.

Ldn Consulting, Jeremy Loudon (January 2019). Appendix A: Final Climate Action Plan Consistency Review Checklist, Permit Number PDS2018-MUP-18-008.

LOS Engineering, Inc., Justin Rosas (July 18, 2018). Traffic Impact Study for Jamul Commercial, MUP-18-008 & TPM-21262, 3018 Jefferson Road, Jamul, California.

Rick Engineering Company; Brendan Hastie (October 10, 2018). Drainage Study for Jamul Retail Center (Preliminary Engineering) County of San Diego Record ID: PDS2018-MUP-18-008 & PDS2018-TPM-21262.

Rick Engineering Company; Brendan Hastie (October 10, 2018). Priority Development Project (PDP) SWQMP, Jamul Retail Center, West Side of Jefferson Road, Jamul CA, 91935.

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

[http://www.sandiegocounty.gov/content/dam/sdc/pds/gpupdate/docs/BOS_Aug2011/EIR/FEIR_5.00 - References_2011.pdf](http://www.sandiegocounty.gov/content/dam/sdc/pds/gpupdate/docs/BOS_Aug2011/EIR/FEIR_5.00_-_References_2011.pdf)

Appendix B

A Summary of Determinations and Mitigation within the Final Environmental Impact Report, County of San Diego General Plan Update, SCH # 2002111067 is available on the Planning and Development Services website at:
http://www.sdcounty.ca.gov/pds/gpupdate/GPU_FEIR_Summary_15183_Reference.pdf