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September 24, 2026

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

Project Name: Fallbrook Self Storage Project

Project Record Numbers: PDS2025-STP-25-008, PDS2025-ER-25-02-06

APN(s): 105-410-18-00

Lead Agency Name and Address:

County of San Diego
Planning and Development Services
5510 Overland Avenue, Suite 110
San Diego, CA 92123-1239

County Staff Contact:

Christopher Jacobs, Environmental Planner
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Project Location:

The Fallbrook Self Storage Project (project) is located on approximately 6.08 acres at 1305 East Mission Road in the unincorporated community of Fallbrook within the County of San Diego (Assessor's Parcel Number 105-410-018).

Project Applicant Name and Address:

Boulder Ridge Capital, LLC
c/o Andrew Bertha
3220 Grey Hawk Court,
Carlsbad, CA 92010

General Plan

Community Plan:	Fallbrook
Regional Categories:	Village
Land Use Designations:	Limited Impact Industrial (I-1)
Density:	-
Floor Area Ratio (FAR):	-

Zoning

Use Regulation: Limited Industrial (M52)
Minimum Lot Size: 6000
Special Area Regulation: B;C

Description of Project:

The project is a self-storage facility at 1305 East Mission Road, located off a shared private driveway approximately 3.5 miles west of Interstate 15 and 500 feet southeast of the intersection of East Mission Road and Industrial Way in the community of Fallbrook. The Project site is currently vacant, situated on a gentle, north-facing slope, bordered by the shared private driveway and industrial uses to the west, a San Diego Gas & Electric battery storage facility to the east, single-family homes to the north, and vacant land and single-family homes to the south. The project will be comprised of nine one-story buildings and one two-story building, totaling 121,950 square feet of gross floor area. The project includes 21 parking spaces and site landscaping.

Vehicular access is provided along an existing unpaved access road within a north-south easement abutting the western property boundary that connects to East Mission Road. Project improvements include paving the private road within this access easement. A 24-foot-wide fire lane would loop around the interior buildings of the site.

Development of the property is subject to Special Area regulations: Community Design Review Area (Zoning Ordinance section 5750-5799) and Airport Land Use Compatibility Plan Area (section 5250-5260). Site Plan review is required due to the Fallbrook Community Design Special Area Regulation.

The project includes off-site improvements to upgrade the private road to County standards along the westerly property line and bring utilities to the site from existing water and sewer services within the private road. Fire service is provided by the North County Fire Protection District. School service is provided by the Fallbrook Union School Districts.

The following project design considerations are also being implemented to minimize environmental impacts:

1. Energy efficiency standards such as site and building lighting.
2. EV and bicycle parking per code requirements; and
3. Compliance with water efficiency standards of the Water Efficient Landscape Ordinance (WELO).

Three Design Exception Requests have been approved i) to remove the dedication / Irrevocable Offer of Dedication (IOD) because the applicant cannot obtain dedication or IOD rights from the underlying property owners who provide access to the project site; ii) to approve the use of the American Association of State Highway and Transportation Officials (AASHTO) Stopping Sight Distance criteria for westbound traffic on E. Mission Road approaching the intersection with the existing private access road; and iii) to waive the requirement for the undergrounding of one proposed power pole located within the private road easement to access the project site.

Overview of 15183 Checklist

California Public Resources Code (PRC) Section 21083.3 and California Environmental Quality Act (CEQA) Guidelines Section 15183 provide an exemption from additional environmental review for projects that are consistent with the development density established by existing zoning, community plan or general plan policies for which an Environmental Impact Report (EIR) was certified, except as might

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

General Plan Update Program EIR

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

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

Summary of Findings

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

A comprehensive environmental evaluation has been completed for the project as documented in the attached Section 15183 Exemption Checklist. This evaluation concludes that the project qualifies for an exemption from additional environmental review because it is consistent with the development density and use characteristics established by the County of San Diego General Plan, as analyzed by the San

Diego County GPU Final Program EIR (ER #02-ZA-001, SCH #2002111067), and all required findings can be made.

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

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

The project would develop a locally-serving commercial storage facility vacant lot which is consistent with the Limited Impact Industrial (I-1) land use and zoning designations and development density established by the GPU and the certified GPU EIR. The project site is surrounded by industrial uses to the west, a San Diego Gas & Electric (SDG&E) battery storage facility to the east, single-family homes to the north, and vacant land and single-family homes to the south.

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

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

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

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

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

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

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

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

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

Signature

Date

Christopher Jacobs
Printed Name

Environmental Planner
Title

CEQA Guidelines §15183 Exemption Checklist

Overview

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

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

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

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

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

Discussion

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

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

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

The Fallbrook Community Plan identifies the Lancaster Mountain RCA. This area is valued as a visual resource and also includes areas of oak woodland, mixed chaparral habitat, and steep rocky slopes. However, the project is not located within the Lancaster Mountain RCA. The project includes development of a 121,950 square feet self-storage facility comprised of nine one-story buildings and one two-story building, parking spaces, landscaping, and stormwater drainage, including two biofiltration basins, on an approximately 6.08-acre project site, consisting of an approximately 5.3 acre parcel and the off-site private road improvement area. The project site is currently vacant, situated on a gentle, north-facing slope, bordered by the shared private driveway and industrial uses to the west, a San Diego Gas & Electric battery storage facility to the east, single-family homes to the north, and vacant land and single-family homes to the south.

Additionally, the project site is located more than 8 miles north of Lancaster Mountain. Additionally, given that the proposed project would be consistent with the land use and zoning designations as well as other commercial uses in the project vicinity, the proposed project would not substantially degrade a scenic vista. Therefore, the project would have a less than significant effect on a scenic vista.

Additionally, the site is subject to the “B” Designator Community Design Review Area Regulation, and Fallbrook Community Design Special Area Regulation which typically require preparation and review of a Site Plan to ensure consistency with the Fallbrook Design Guidelines.

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

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

The project site is not located near or visible within the composite viewshed of a State scenic highway and would not damage or remove visual resources within a State scenic highway. The nearest eligible State scenic highway is Interstate 15, which is located 3.5 miles to the east and State Route 76, which is located 5.7 miles to the south. The nearest designated State scenic highway is State Route 76 located more than 32 miles northeast of the project site. Additionally, a portion of Mission and Green Canyon Roads from State Route 76 north and east to Reche Road are identified in the County’s Conservation and Open Space Element of the General Plan as a Scenic Corridor. The project is located over one mile from the closest portion of the roadway identified as a Scenic Corridor. Due to distance, topography, and intervening structures, the project site is not visible from the State scenic highways or County Scenic Corridor. As such, the project site is not visible within the composite viewshed of a State scenic highway or County Scenic Corridor and would not damage or remove visual resources within a State scenic highway or County Scenic Corridor. Therefore, impacts would be less than significant.

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

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

The project site is located in a rural residential and commercial area. The project site is bordered by commercial development to the west, a battery storage facility to the east, residential development to the north, and vacant lots totaling approximately 7 acres to the south. The project includes development of a 121,950 square feet self storage facility comprised of nine one-story buildings and one two-story building on an approximately 6.08-acre project site, which is consistent with the Limited Impact Industrial (I-1) land use designation and Limited Industrial (M52) zoning for the project site. The project would be consistent with the surrounding rural residential and commercial landscape, and therefore, would not substantially degrade the existing visual character or quality of public views of the site and its surroundings. The project would be required to include preparation of Landscape Plans pursuant to the County's Water Efficient Landscape Design Manual and Water Conservation in Landscaping Ordinance. The project would also be in conformance with the County's Grading Ordinance. Therefore, the project would not conflict with applicable zoning and other regulations governing scenic quality.

Additionally, the site is subject to the "B" Designator Community Design Review Area Regulation, and Fallbrook Community Design Special Area Regulation which typically require preparation and review of a Site Plan to ensure consistency with the Fallbrook Design Guidelines.

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

- 1(d) The GPU EIR concluded this impact to be significant and unavoidable. The proposed Project would use outdoor lighting and is located within Zone B as identified by the San Diego County Light Pollution Code, approximately 47 miles from the Mount Laguna Observatory and approximately 76 miles from Palomar Observatory. However, the Project would not adversely affect nighttime views or astronomical observations, because the Project would conform to the Light Pollution Code (Section 51.201-51.209), including the Zone B lamp type and shielding requirements per fixture and hours of operation limitations for outdoor lighting and searchlights. The code was developed by the County in cooperation with the lighting engineers, astronomers, and other experts to effectively address and minimize the impact of new sources light pollution on nighttime views. Compliance with the Code would be required prior to issuance of a building permit. Thus, the proposed project would not create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area.

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

Conclusion

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

1. No peculiar impacts to the project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.

3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. No mitigation measures contained within the GPU EIR would be required because project specific impacts would be less than significant.

Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
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2. Agriculture/Forestry Resources

– Would the Project:

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

☐☐☐

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

☐☐☐

c) Conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland zoned Timberland Production?

☐☐☐

d) Result in the loss of forest land, conversion of forest land to non-forest use, or involve other changes in the existing environment, which, due to their location or nature, could result in conversion of forest land to non-forest use?

☐☐☐

e) Involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Important Farmland or other agricultural resources, to non-agricultural use?

☐☐☐

Discussion

- 2(a) The GPU EIR concluded this impact to be significant and unavoidable. Additionally, according to the California Department of Conservation (DOC) California Important Farmland Finder, the project site is located on lands designated Farmland of Local Importance as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency. However, based on the County of San Diego Geographical Information System (GIS) and aerial imagery, the project site does not contain any agricultural resources. The project site is bordered by the shared private driveway and industrial uses to the west, a San Diego Gas & Electric battery storage facility to the east, single-family homes to the north, and vacant land and single-family homes to the south.

As previously discussed, the GPU EIR determined impacts from direct and indirect conversion of agricultural resources to be significant and unavoidable. However, the proposed project would

have no impact. Therefore, the project would be consistent with the analysis provided within the GPU EIR.

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

As previously discussed, the GPU EIR determined impacts from land use conflicts to be less than significant with mitigation. As the proposed project would have no impact for the reasons detailed above, the project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 2(c) The GPU EIR concluded this impact to be significant and unavoidable. The project site does not contain forest lands or timberland. The County of San Diego does not have any existing Timberland Production Zones. In addition, the project is consistent with existing zoning, and a rezone is not proposed. Therefore, project implementation would not conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland production zones.

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

- 2(d) The GPU EIR concluded this impact to be significant and unavoidable. As indicated in response 2(c), the project site, or any off-site improvements, are not located near any forest lands. Therefore, the project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 2(e) The GPU EIR concluded this impact to be significant and unavoidable. As mentioned above in response 2(a), the project site would not be considered an agricultural resource. Therefore, the project would not result in any conversion of onsite agricultural resources to a non-agricultural use.

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

Conclusion

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

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

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

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

Discussion

The Fallbrook Self Storage Project Air Quality and Greenhouse Gas Emissions and Energy Consumption Technical Memorandum was prepared for the project by Vista Environmental, dated August 26, 2025. The following responses have incorporated the results from the modeling.

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

The proposed project would construct a self-storage facility on the project site, which is consistent with the General Plan land uses and SANDAG growth projections. Therefore, the project would not conflict with the region's future employment and housing needs. This project is not a transportation project that would affect the region's transportation systems and should not increase transportation demands within the local area. Therefore, the project would not induce

substantial population and would not conflict with or obstruct implementation of the RAQS and SIP. In addition, the construction and operational emissions from the project are anticipated to be below established screening-level thresholds (SLTs), as addressed under Section 3(b), and would not violate any ambient air quality standards.

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

- 3(b) The GPU EIR concluded impacts to be significant and unavoidable. San Diego County is currently in non-attainment for ozone (O_3) under the National Ambient Air Quality Standard (NAAQS). San Diego County is also presently in non-attainment for O_3 , particulate matter less than or equal to 10 microns (PM_{10}), and particulate matter less than or equal to 2.5 microns ($PM_{2.5}$) under the California Ambient Air Quality Standard (CAAQS). O_3 is formed when volatile organic compounds (VOCs) and nitrogen oxides (NO_x) react in the presence of sunlight. VOC sources include any source that burns fuels (e.g., gasoline, natural gas, wood, oil), solvents, petroleum processing and storage, and pesticides. Sources of NO_x include any source that burns fuel. Sources of PM_{10} and $PM_{2.5}$ in both urban and rural areas include the following: motor vehicles, wood burning stoves and fireplaces, dust from construction, landfills, agriculture, wildfires, brush/waste burning, and industrial sources of windblown dust from open lands.

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

Table 2 County of San Diego Screening Level Thresholds			
Pollutant	Emission Rate		
	Pounds/Hour	Pounds/Day	Tons/Year
Respirable Particulate Matter (PM_{10})	--	100	15
Fine Particulate Matter ($PM_{2.5}$)	--	55 ^a	10 ^a
Oxides of Nitrogen (NO_x)	25	250	40
Oxides of Sulfur (SO_x)	25	250	40
Carbon Monoxide (CO)	100	550	100
Lead and Lead Compounds	--	3.2	0.6
Volatile Organic Compounds (VOCs)	--	75 ^b	13.7 ^c
SOURCE: SDAPCD, Rules 20.1, 20.2, 20.3; County of San Diego 2007.			
^a Based on the U.S. EPA "Proposed Rule to Implement the Fine Particle National Ambient Air Quality Standards" published September 8, 2005. Also used by the South Coast Air Quality Management District.			
^b Threshold for VOCs based on the threshold of significance for VOCs from the South Coast Air Quality Management District for the Coachella Valley.			
^c 13.7 tons per year threshold based on 75 pounds per day multiplied by 365 days per year and divided by 2,000 pounds per ton.			

Air emissions were calculated using California Emissions Estimator Model (CalEEMod) 2022.1.1.29. CalEEMod is a tool used to estimate air emissions resulting from land development projects in the state of California. The model generates air quality emission estimates from construction activities and breaks down operational criteria pollutant emissions into three categories: mobile sources (e.g., traffic), area sources (e.g., landscaping equipment, consumer projects, and architectural coatings), and energy sources (e.g., natural gas heating). CalEEMod provides emission estimates of NO_x, carbon monoxide (CO), oxides of sulfur (SO_x), respirable particulate matter (PM₁₀), fine particulate matter (PM_{2.5}), and VOCs. Inputs to CalEEMod include such items as the air basin containing the project, land uses, trip generation rates, trip lengths, duration of construction phases, construction equipment usage, grading areas, as well as other parameters.

The project includes the construction of nine one-story buildings and one two-story building, totaling up to 140,000 square feet of gross floor area with associated internal roads, landscaping, and two detention basins on an approximately 5.37-acre project site. On-site construction emissions are attributed to emissions occurring within the project area, such as the activity of construction equipment. Off-site construction emissions related to the project include vendor, hauling, and worker vehicle trips to and from the project site. Emissions generated during construction activities would be temporary and localized. Grading of the site is anticipated to be balanced with no dirt being imported or exported from the project site. Construction activities would be subject to the County of San Diego Grading Ordinance and SDAPCD Rule 55 to reduce fugitive dust. To further reduce potential impacts generated during the construction phase, the project would include the following project design features, consistent with local, regional, and state regulations as well as GPU EIR mitigation measures Air-2.5, Air-2.6, Air-2.7, and Air-2.9.

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

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

Table 3 Estimated Maximum Daily Project Construction Emissions						
Emissions	Pollutant					
	VOCs	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Max. Daily (lb/day)	33.9	29.2	29.5	0.05	6.50	3.80
<i>Screening Level Threshold</i>	75	250	550	250	100	55
Exceeds Threshold?	No	No	No	No	No	No
SOURCE: CalEEMod; SDAPCD, Rules 20.1, 20.2, 20.3; County of San Diego 2007.						

The proposed project would consist of operation of the proposed self storage facility. The proposed project would generate air emissions from area sources, energy usage, and from project-generated vehicle trips. Emissions of all pollutants would be below the County's recommended SLTs. Therefore, the project would not violate any air quality standard or contribute substantially to an existing or projected air quality violation.

Table 4 Estimated Maximum Daily Project Operational Emissions						
Emissions	Pollutant					
	VOCs	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Max. Daily (lb/day)	4.99	1.16	11.98	0.01	1.23	0.36
Screening Level Threshold	75	250	550	250	100	55
Exceeds Threshold?	No	No	No	No	No	No
SOURCE: CalEEMod; SDAPCD, Rules 20.1, 20.2, 20.3; County of San Diego 2007.						

As previously discussed, the GPU EIR determined significant and unavoidable impacts to air quality violations. The project would not violate any air quality standard or contribute substantially to an existing or projected air quality violation and would not result in an impact that was not previously identified in the GPU EIR with the incorporation of mitigation consistent with GPU EIR mitigation measures Air-2.5, Air-2.6, Air-2.7, and Air-2.9.

- 3(c) The GPU EIR concluded this impact to be significant and unavoidable. San Diego County is presently in non-attainment for the NAAQS and CAAQS for O₃. San Diego County is also presently in non-attainment for PM₁₀ and PM_{2.5} under the CAAQS. O₃ is formed when VOCs and oxides of nitrogen (NO_x) react in the presence of sunlight. VOC sources include any source that burns fuels (e.g., gasoline, natural gas, wood, oil); solvents; petroleum processing and storage; and pesticides. Sources of PM₁₀ and PM_{2.5} in both urban and rural areas include: motor vehicles, wood burning stoves and fireplaces, dust from construction, landfills, agriculture, wildfires, brush/waste burning, and industrial sources of windblown dust from open lands.

The project would contribute PM₁₀, PM_{2.5}, NO_x, and VOC emissions from construction/grading activities; however, it would not exceed established SLTs (see Section 3(b) above). Additionally, grading and all other construction activities would be subject to the measures listed above, including the implementation of dust control measures consistent with the County of San Diego Grading Ordinance and SDAPCD Rule 55. Additionally, the project would include the use of USEPA certified Tier 3 and Tier 4 construction equipment with DPF or equivalent for the construction activity, which would further reduce emissions of particulate matter during construction.

The project would generate PM₁₀, PM_{2.5}, and NO_x emissions during project operations primarily from mobile sources (i.e., vehicle trips), and VOCs from area and mobile sources. However, as previously described, operational emissions of all pollutants would be below the County's recommended SLTs.

Cumulative impacts could occur if the most intensive phases of construction for the proposed project occur simultaneously with other intensive phases of proposed projects in close proximity. The most intensive construction phase for the project and for typical developments occurs during earthwork and grading activities. During these phases, the primary criteria air pollutant of concern would be PM₁₀. However, the project's estimated emissions of criteria air pollutants, specifically PM₁₀, was estimated to be 6.5 lb/day, which would be well below the County's SLT of 100 lb/day for PM₁₀ during construction activities. Further, due to the highly dispersive nature of particulate matter, a cumulative impact during construction activities would only occur if a project adjacent to the proposed project undergoes simultaneous grading/earthwork activities and emits significantly greater PM₁₀ emissions than the project. Because all projects developed within the County would be required to comply with the County Grading Ordinance and SDAPCD Rule 55, this scenario is not anticipated to occur.

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

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

- 3(d) The GPU EIR concluded this impact to be significant and unavoidable. Air quality regulators typically define sensitive receptors as schools (Preschool – 12th Grade), hospitals, resident care facilities, day-care centers, residences, or other facilities that may house individuals with health conditions that would be adversely impacted by changes in air quality. Because the project proposes self storage land uses, the proposed project would not be considered a point-source of significant operational emissions.

Carbon Monoxide Hotspot Analysis

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

A CO hotspot analysis is required by the County if a proposed development would cause road intersections to operate at or below a LOS E with intersection peak-hour trips exceeding 3,000 trips. Fallbrook Self Storage Site Access Assessment (Traffic Analysis), prepared by Linscott Law & Greenspan, September 15, 2026, found that the project would generate 203 vehicle trips per day. Therefore, the negligible additional traffic generated during project operation would not cause intersections in the vicinity of the project site to operate at or below LOS E, and a CO hotspot analysis is not required for the proposed project as project-generated trips would not result in, or substantially contribute to, CO concentrations that exceed the eight-hour ambient air quality standards along area roadways and intersections.

Toxic Air Contaminants (TACs)

Diesel particulate matter (DPM) is the primary toxic air contaminant (TAC) of concern and is generated from fuel consumption in heavy construction equipment. As discussed in Section 3(b), the NAAQS and CAAQS would not be exceeded due to project contributions for both construction and operations. The County's SLTs for human health hazards were developed in support of State and federal ambient air quality strategies that are protective of human health.

Construction-related activities would result in short-term, project-generated emissions of DPM exhaust emissions from off-road, heavy-duty diesel equipment for site preparation grading, building construction, and other construction activities. DPM was identified as a TAC by CARB in

1998. The potential cancer risk from the inhalation of DPM (discussed in the following paragraphs) outweighs the potential non-cancer health impacts and is therefore the focus of this discussion (CARB 2017).

Generation of DPM from construction projects typically occurs in a single area for a short period. The dose to which the receptors are exposed is the primary factor used to determine health risk. Dose is a function of the concentration of a substance or substances in the environment and the extent of exposure that person has with the substance. Dose is positively correlated with time, meaning that a longer exposure period would result in a higher exposure level for the Maximally Exposed Individual. The risks estimated for a Maximally Exposed Individual are higher if a fixed exposure occurs over a longer period of time. According to the California Office of Environmental Health Hazard Assessment (OEHHA), health risk assessments (HRA), which determine the exposure of sensitive receptors to toxic emissions, should be based on a 30-year exposure period (assumed to be the approximate time that a person spends at a single household location). OEHHA recommends this risk be bracketed with nine-year and 70-year exposure periods and that HRA should be limited to the period/duration of activities associated with the project (OEHHA 2015).

The maximum on-site PM_{2.5} emissions, which are used to represent DPM emissions for this analysis, would occur during site preparation and grading activities. Given the relatively limited number of heavy-duty construction equipment, the varying distances that construction equipment would operate to the nearby sensitive receptors, and the short-term construction schedule, the proposed project would not result in a long-term (i.e., 30 or 70 years) substantial source of toxic air contaminant emissions and corresponding individual cancer risk.

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

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

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

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

- 3(e) The GPU EIR concluded this impact to be less than significant. SDAPCD Rule 51, commonly referred to as the public nuisance rule, prohibits emissions from any source whatsoever in such quantities of air contaminants or other material that cause injury, detriment, nuisance, or annoyance to the public health or damage to property. The potential for an operation to result in odor complaints from a “considerable” number of persons in the area would be considered a significant, adverse odor impact.

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

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

As previously discussed, the GPU EIR determined less than significant impacts from objectionable odors. As the project would have a less than significant impact from objectionable odors for the reasons stated above, the project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

Conclusion

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

- 1. No peculiar impacts to the project or its site have been identified.
- 2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
- 3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
- 4. Feasible mitigation measures contained within the GPU EIR (Air-2.5, Air-2.6, Air-2.7, and Air-2.9) would be applied to the project.

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
4. Biological Resources – Would the Project:			
a) Have a substantial adverse effect, either directly or through habitat modifications, on any candidate,	☐	☐	☐

sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

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

☐☐☐

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

☐☐☐

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

☐☐☐

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

☐☐☐

Discussion

A Biological Resources Report was prepared for the proposed project by Chambers Group LLC dated January 2026. The Biological Resources Report consists of a literature review and results of a field reconnaissance survey conducted on December 4, 2024 and January 24, 2025. The following responses have incorporated the analysis from the report.

- 4(a) The GPU EIR concluded this impact to be significant and unavoidable. In compliance with GPU EIR Mitigation Measure Bio 1-5, a Biological Resources Report was prepared by Chambers Group LLC for the project, utilizing the County Guidelines for Determining Significance for Biological Resources to identify impacts. The project site contains Coast Live Oak Woodland, California Walnut Tree, Olive Tree, Escaped Ornamental, Ornamental Landscaping, Disturbed, Bare Ground and Developed. During the site surveys conducted for the Biological Resources Report, no special status plant or wildlife species were observed or detected. One CA Candidate Endangered species, Crotch's bumble bee, was considered to have a moderate potential for occurrence within the Survey Area based on the biological reconnaissance survey and recent iNat sightings. Focused surveys were conducted for Crotch's bumble bee during the 2025 colony active period. The focused surveys were negative; therefore, Crotch's bumble bee can be considered absent from the project site. In addition, vegetation within the project area provides potential habitat for nesting birds protected under the Migratory Bird Treaty Act. Finally, the project would impact 0.92 acre of Coast Live Oak Woodland. The project would be required to mitigate the impact at a ratio of 3:1 under the County Guidelines, requiring a total of 2.76 acres of

mitigation. Mitigation would be accomplished through the purchase of mitigation credits from a California Department of Fish and Wildlife approved mitigation bank.

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: preservation of habitat and breeding season avoidance. The GPU EIR identified these mitigation measures as Bio 1.6 and Bio 1.7.

- 4(b) The GPU EIR concluded this impact to be significant and unavoidable. Based on the general survey of the site, land cover types include: coast live oak woodland, California walnut Tree, olive tree, escaped Ornamental, Ornamental Landscaping, Disturbed, Bare Ground and Developed. The project would impact 0.92 acre of Coast Live Oak Woodland. The project would be required to mitigate the impact at a ratio of 3:1 under the County Guidelines, requiring a total of 2.76 acres of mitigation. Mitigation would be accomplished through the purchase of mitigation credits from a California Department of Fish and Wildlife approved mitigation bank.

As considered by the GPU EIR, project impacts to sensitive habitats will be mitigated through ordinance compliance and through implementation of the following mitigation measures: the purchase of mitigation credits from a California Department of Fish and Wildlife approved mitigation bank. The GPU EIR identified these mitigation measures as Bio 1.6 and Bio 1.7.

- 4(c) The GPU EIR concluded this impact to be less than significant with mitigation. A Preliminary Jurisdictional Delineation was prepared for the project site. One drainage subject to potential US Army Corps of Engineers (USACOE), Regional Water Quality Control Board (RWQCB), and California Department of Fish and Game (CDFW) jurisdiction was identified. The drainage crosses through a concrete culvert underneath an existing dirt access road. A total of 0.002 acre of presumed non-wetland waters of the U.S. is considered present and are presumed to be under the jurisdiction of the USACOE. A total of 0.002 acre of potential non-wetland waters was identified within the project area and are potentially under the jurisdiction of the RWQCB. Finally, a total of 0.005 acre of potential non-wetland waters of the State were identified within the project area and are potentially under the jurisdiction of CDFW. No riparian or wetland vegetation was observed within the drainage.

Potential impacts to waters for road improvements would be temporary in nature, and impacts are expected to be minimal (up to 0.005 acre under CDFW jurisdiction, and up to 0.002 acre under USACE and RWQCB jurisdiction). The water feature, including the size and water capacity, would be restored to pre-construction conditions. The water feature lacks riparian and wetland vegetation. In order to avoid and minimize temporary impacts during construction, such as the potential for runoff downstream of the proposed project site, installation of Best Management Practices (BMPs) such as straw wattles and sandbags within the streambed downstream of construction are recommended. Regulatory permits would be obtained if required, or evidence that permits are not required would be provided.

As previously discussed, the GPU EIR determined impacts to federally protected wetlands as less than significant with mitigation. However, the project would not result in impacts to protected wetlands for the reasons detailed above. Therefore, the project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 4(d) The GPU EIR concluded this impact to be significant and unavoidable. The Biological Resources Memo determined that the project site does not contain habitat that supports the movement of

fish or wildlife species or native wildlife nursery sites. The project site is surrounded by development and is not expected to provide significant connectivity between open space areas. The proposed project would not contribute to impeding wildlife movement or the use of native wildlife nursery sites. Therefore, impacts would be less than significant.

As previously discussed, the GPU EIR determined impacts to wildlife movement corridors as significant and unavoidable. However, the proposed project would have less than significant impacts with no required mitigation for the reasons detailed above. Therefore, the project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 4(e) The GPU EIR concluded this impact to be less than significant. The project is located within the San Diego draft North County Multiple Species Conservation Program (MSCP) planning area boundary and outside of the South County MSCP. Therefore, it does not require conformance with the Biological Mitigation Ordinance (BMO). The Project is consistent with the County's Guidelines for Determining Significance for Biology, and the Resource Protection Ordinance (RPO). The project would not conflict with the provisions of any adopted Habitat Conservation Plan, Natural Communities Conservation Plan, other approved local, regional, or state habitat conservation plan or any other local policies or ordinances that protect biological resources. As the proposed project would have a less-than-significant impact for the reasons detailed above, the project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

Conclusion

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

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

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

a) Cause a substantial adverse change in the significance of a historical resource as defined in 15064.5?

☐
☐
☐

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

☐
☐
☐

- | | | | |
|--|--------------------------|--------------------------|--------------------------|
| c) Directly or indirectly destroy a unique geologic feature? | ☐ | ☐ | ☐ |
| d) Directly or indirectly destroy a unique paleontological resource or site? | ☐ | ☐ | ☐ |
| e) Disturb any human remains, including those interred outside of formal cemeteries? | ☐ | ☐ | ☐ |

Discussion

- 5(a) The GPU EIR concluded this impact to be less than significant with mitigation. Based on an analysis of records and a survey of the property, it has been determined that there are no impacts to historical resources because they do not occur within the project site. A cultural survey was conducted in 2018 for a prior approval (PDS2019-ZAP-19-001), and a 1956 historic residence was identified and determined to not be a significant resource under CEQA. The residence has since been removed. The results of the survey are provided in a cultural resources report titled, "Cultural Resources Survey Report for the AES Fallbrook Project, Fallbrook, California" (October 2018), prepared by Shelby Castells.

As previously discussed, the GPU EIR determined impacts on historic resources to be less than significant with mitigation. The proposed project was determined to have no impacts on historic resources. Therefore, the project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 5(b) The GPU EIR concluded this impact to be less than significant with mitigation. Based on an analysis of records and a survey of the property, it has been determined that no archaeological resources were identified. A cultural survey was conducted in 2018 for a prior approval (PDS2019-ZAP-19-001), and a 1956 historic residence was identified and determined to not be a significant resource under CEQA. The residence has since been removed. The results of the survey are provided in a cultural resources report titled, "Cultural Resources Survey Report for the AES Fallbrook Project, Fallbrook, California" (October 2018), prepared by Shelby Castells.

Notification of the project was provided to six tribes (Pala, Pechanga, Rincon, San Luis Rey, San Pasqual, and Soboba). Two tribes responded (Pala and Rincon), and meetings with each tribe has been conducted. No tribal cultural resources have been identified within the project site; however, they are present in the surrounding vicinity.

Although no resources were identified during the site survey, the potential exists for subsurface deposits because of dense vegetative cover on portions of the property which limited ground visibility. Additionally, several recorded archaeological sites are located within the vicinity of the project. As a precautionary measure for any inadvertent discoveries, the project will still be conditioned to include Archaeological and Tribal Monitoring, as well as a Cultural Resources Treatment Agreement and Preservation Plan throughout all grading activities.

As previously discussed, the GPU EIR determined impacts to archaeological resources as less than significant with mitigation. As considered by the General Plan EIR, potential impacts to cultural resources will be mitigated through ordinance compliance and through implementation of the following mitigation measures: archaeological and tribal monitoring in conformance with the County's Cultural Resource Guidelines if resources are encountered. The General Plan EIR identified these mitigation measures as Cul 2.5. Therefore, the project would be consistent with

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

Archaeological and Tribal Monitoring Program

- Pre-Construction
 - A County-approved archaeologist (Project Archaeologist) shall be contracted to perform archaeological monitoring and a potential data recovery program during all grading, clearing, grubbing, trenching, and construction activities. The Project Archaeologist shall perform the monitoring duties before, during, and after construction pursuant to the most current version of the County of San Diego Guidelines for Determining Significance and Report Format and Requirements for Cultural Resources. The contract or letter of acceptance provided to the County shall include an agreement that the archaeological monitoring will be completed, and a Memorandum of Understanding (MOU) between the Project Archaeologist and the County of San Diego shall be executed. The contract or letter of acceptance shall include a cost estimate for the monitoring work and reporting.
 - The Project Archeologist shall provide evidence that a Luiseño Native American has been contracted by the property owner or their representative to perform Native American Monitoring for the project.
 - The cost of the monitoring shall be added to the grading bonds or bonded separately.
 - The County approved Project Archaeologist and Native American Monitor shall attend the pre-construction meeting with the contractors to explain and coordinate the requirements of the archaeological monitoring program.
- Construction
 - **Monitoring.** During the original cutting of previously undisturbed deposits, the Project Archaeologist and Native American Monitor shall be onsite as determined necessary by the Project Archaeologist. Inspections will vary based on the rate of excavation, the materials excavated, and the presence and abundance of artifacts and features. The frequency and location of inspections will be determined by the Project Archaeologist in consultation with the Native American Monitor. Monitoring of the cutting of previously disturbed deposits will be determined by the Project Archaeologist in consultation with the Native American Monitor.
 - **Inadvertent Discoveries.** In the event that previously unidentified potentially significant cultural resources are discovered:
 - The Project Archaeologist or the Native American monitor shall have the authority to divert or temporarily halt ground disturbance operations in the area of discovery to allow evaluation of potentially significant cultural resources.
 - At the time of discovery, the Project Archaeologist shall contact the PDS Staff Archaeologist.
 - The Project Archaeologist, in consultation with the PDS Staff Archaeologist and the Native American Monitor, shall determine the significance of the discovered resources.
 - Construction activities will be allowed to resume in the affected area only after the PDS Staff Archaeologist has concurred with the evaluation.
 - Isolates and clearly non-significant deposits shall be minimally documented in the field. Should the isolates and/or non-significant deposits not be collected by the Project Archaeologist, then the Native American monitor may collect the cultural material for transfer to a Tribal Curation facility or repatriation program.

- If cultural resources are determined to be significant, a Research Design and Data Recovery Program (Program) shall be prepared by the Project Archaeologist in consultation with the Native American Monitor. The County Archaeologist shall review and approve the Program, which shall be carried out using professional archaeological methods. The Program shall include (1) reasonable efforts to preserve (avoidance) “unique” cultural resources or Sacred Sites; (2) the capping of identified Sacred Sites or unique cultural resources and placement of development over the cap, if avoidance is infeasible; and (3) data recovery for non-unique cultural resources. The preferred option is preservation (avoidance).
- **Human Remains.** If any human remains are discovered:
 - The Property Owner or their representative shall contact the County Coroner and the PDS Staff Archaeologist.
 - Upon identification of human remains, no further disturbance shall occur in the area of the find until the County Coroner has made the necessary findings as to origin. If the human remains are to be taken offsite for evaluation, they shall be accompanied by the Native American monitor.
 - If the remains are determined to be of Native American origin, the NAHC shall immediately contact the Most Likely Descendant (MLD).
 - The immediate vicinity where the Native American human remains are located is not to be damaged or disturbed by further development activity until consultation with the MLD regarding their recommendations as required by Public Resources Code Section 5097.98 has been conducted.
 - The MLD may with the permission of the landowner, or their authorized representative, inspect the site of the discovery of the Native American human remains and may recommend to the owner or the person responsible for the excavation work means for treatment or disposition, with appropriate dignity, of the human remains and any associated grave goods. The descendants shall complete their inspection and make recommendations or preferences for treatment within 48 hours of being granted access to the site.
 - Public Resources Code §5097.98, CEQA §15064.5 and Health & Safety Code §7050.5 shall be followed in the event that human remains are discovered.
- **Fill Soils.** The Project Archaeologist and Native American monitor shall evaluate fill soils to determine that they are clean of cultural resources.
 - **Monthly Reporting.** The Project Archaeologist shall submit monthly status reports to the Director of PDS starting from the date of the Notice to Proceed to termination of implementation of the Archaeological and Tribal Monitoring Program. The report shall briefly summarize all activities during the period and the status of progress on overall plan implementation. Upon completion of the implementation phase, a final report shall be submitted describing the plan compliance procedures and site conditions before and after construction.
- **Rough Grading**
 - **Monitoring Report.** The Project Archaeologist shall prepare one of the following reports upon completion of the earth-disturbing activities that require monitoring and submit the Archaeological Monitoring Report to PDS Project Planning Division for review and approval. Once approved, a final copy of the report shall be submitted to the South Coastal Information Center and any culturally-affiliated Tribe who requests a copy.
 - **No Archaeological Resources Encountered.** If no archaeological resources are encountered during earth-disturbing activities, then submit a final Negative Monitoring Report

substantiating that earth-disturbing activities are completed and no cultural resources were encountered. Archaeological monitoring logs showing the date and time that the monitor was on site and any comments from the Native American Monitor must be included in the Negative Monitoring Report.

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

or

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

- Historic materials shall be curated at a San Diego curation facility and shall not be curated at a Tribal curation facility or repatriated. The collections and associated records, incling title, shall be transferred to the San Diego curation facility and shall be accompanied by payment of the fees necessary for permanent curation. Evidence shall be in the form of a letter from the curation facility stating that the historic materials have been received and that all fees have been paid.
- If no cultural resources are discovered, a Negative Monitoring Report must be submitted stating that the archaeological monitoring activities have been completed. Grading Monitoring Logs must be submitted with the negative monitoring report.

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

As previously discussed, the GPU EIR determined impacts on unique geologic features as less than significant. As the project would have no impacts for the reasons detailed above, the project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

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

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

- 5(e) The GPU EIR concluded this impact to be less than significant with mitigation. Based on an analysis of records and archaeological surveys of the property, it has been determined that the project is not likely disturb any human remains because the project site does not include a formal cemetery or any archaeological resources that might contain interred human remains. In the unlikely event that human remains are encountered onsite during earth-disturbing activities, GPU EIR mitigation measure Cul-4.1 would ensure that state and federal laws and regulations regarding human remains (i.e., Public Resources Code §5097.98, CEQA Guidelines §15064.5 and Health & Safety Code §7050.5) are followed.

As previously discussed, the GPU EIR determined impacts to human remains as less than significant with mitigation. The proposed project determined impacts to human remains as less than significant. Therefore, the project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

Conclusion

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

1. No peculiar impacts to the project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. Feasible mitigation measures contained within the GPU EIR (Cul-2.5 and Cul-4.1), would be applied to the project.

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

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

☐ ☐ ☐

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

☐ ☐ ☐

Discussion

Energy use was not specifically analyzed within the GPU EIR as a separate issue area under CEQA. At the time, Energy Use was contained within Appendix F of the CEQA Guidelines and since then has been moved to the issue areas within Appendix G of the CEQA Guidelines. However, the issue of energy use in general was discussed within the GPU and the GPU EIR. For example, within the Conservation and Open Space Element of the GPU, Goal COS-15 promotes sustainable architecture and building techniques that reduce emissions of criteria pollutants and GHGs, while protecting public health and contributing to a more sustainable environment. GPU Policies COS-15.1, COS-15.2, and COS-15.3 would support this goal by encouraging design and construction of new buildings and upgrades of existing buildings to maximize energy efficiency and reduce GHGs. Goal COS-17 promotes sustainable solid waste management. Policies COS-17.1 and COS-17.5 would support this goal by reducing GHG emissions through waste reduction techniques and methane recapture. The analysis below specifically analyzes the energy use of the project.

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

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

In addition, all new construction would be required to comply with the energy code in effect at the time of construction, which ensures efficient building construction. The project would also be required to comply with Title 24 energy standards for energy efficiency. Project design features that would result in lower energy use including enhanced insulation, use of energy efficient lighting and appliances, 2 Electric Vehicle-only parking spaces as well as requiring a variety of other energy-efficiency measures to be incorporated into the proposed structures. Therefore, the construction and operation of the project is not expected to result in wasteful or inefficient use of energy, and impacts would be less than significant.

The proposed project would use only the amount of energy necessary for the construction and operation of the proposed self-storage facility that is typical of this type of development. The proposed project would be consistent with the General Plan land uses and SANDAG growth

projections. Therefore, the project would not result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation.

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

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

- Incorporation of Title 24 energy standards.
- Enhanced insulation
- Construction and demolition recycling in compliance with County Ordinance Section 68.511 through 68.520 (Diversion of Construction and Demolition Materials from Landfill Disposal).
- EV charging in compliance with EV requirements in the most recently adopted version of CALGreen.

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

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

Conclusion

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

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

7. Geology and Soils – Would the Project:

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

Discussion

A Geological Investigation was prepared for the project by Geocon Incorporated dated November 11, 2025. The following responses have incorporated the analysis from the report.

7(a)(i) The GPU EIR concluded this impact to be less than significant. The project site is not located on or in proximity to any known active or potentially active fault traces. The closest active fault is the Newport-Inglewood-Rose Canyon fault zone located approximately 4.5 miles to the west. Due to the distance of these faults from the project site, project construction would not result in substantial adverse effects from ground surface rupture at any of these faults. Therefore, impacts would be less than significant.

7(a)(ii) The GPU EIR concluded this impact to be less than significant. The GPU EIR concluded this impact to be less than significant. To ensure the structural integrity of all buildings and structures, the proposed project must conform to the Seismic Requirements as outlined within the California Building Code. In addition, a soils compaction report with proposed foundation recommendation would be required to be approved before the issuance of a building permit. The report would review the qualities of the soil, its expansive characteristics, relative compaction and any soil problem which if not corrected may lead to structural defects of buildings or structures constructed or to be constructed on the site. During the review of the building permit, the County Building Official shall review the report and ensure measures are taken to prevent structural damage to future buildings or structures constructed on the site. Therefore, compliance with the California Building Code and the County Building Code would ensure that the project would not result in a significant impact.

7(a)(iii) The GPU EIR concluded this impact to be less than significant. The GPU EIR concluded this impact to be less than significant. The project site is within a "Potential Liquefaction Area" as

identified in the County Guidelines for Determining Significance for Geologic Hazards. This indicates that there is liquefaction potential at the site. The project would be required to comply with the County's Grading Ordinance and Building Code and conduct a soils investigation prior to approval of a building permit. Therefore, compliance with the California Building Code and the County Building Code would ensure that the project would not result in a significant impact.

As previously discussed, the GPU EIR determined impacts from liquefaction to be less than significant. As the project would have a less than significant impact for the reasons detailed above, the project would be consistent with the analysis in the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance other than the information identified in the GPU EIR.

- 7(a)(iv) The GPU EIR concluded this impact to be less than significant. The project site is not within a landslide susceptibility category as identified by the California Department of Conservation or in the County Guidelines for Determining Significance for Geologic Hazards. The project would not result in a potentially significant impact from the exposure of people or structures to potential adverse effects from landslides.

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

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

As previously discussed, the GPU EIR determined impacts from soil erosion and topsoil loss to be less than significant. As the project would have a less than significant impact for the reasons detailed above, the project would be consistent with the analysis in the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance other than the information identified in the GPU EIR.

- 7(c) The GPU EIR concluded this impact to be less than significant. Grading associated with the project would be required to conform to the grading requirements outlined in the County Grading, Clearing, and Watercourses Ordinance (Grading Ordinance) and be verified in the field by a licensed or registered Civil Engineer and inspected by County Grading Inspectors. In addition, a Soils Engineering Report is required as part of the Building Permit process to assure that the proposed buildings are adequately supported. This Report would evaluate the strength of underlying soils and make recommendations on the design of building foundation systems. The Soils Engineering Report must demonstrate that a proposed building meets the structural stability standards required by the California Building Code. The Report must be approved by the County prior to the issuance of a Building Permit. Therefore, the Grading Plan prepared by the registered Civil Engineer and compliance with the Grading Ordinance ensure the project would not result in

a potentially significant impact related to landslide, lateral spreading, subsidence, liquefaction, or collapse. Therefore, impacts would be less than significant. For further information regarding landslides, liquefaction, and lateral spreading, refer to Section 7(a)(iii) through (iv) listed above.

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

- 7(d) The GPU EIR determined impacts from expansive soils to be less than significant. The project site is underlain by expansive soils. The project would be required to submit a Soils Engineering Report by a California Certified Engineering Geologist prior to grading. The soils report is required to include a surficial stability analysis with design recommendations. All geotechnical recommendations provided in the soils report would be followed during grading and construction of the project.

As previously discussed, the GPU EIR determined impacts from expansive soils to be less than significant. As the Project would have a less-than-significant impact for the reasons detailed above, the Project would be consistent with the analysis within the GPU EIR because it would not create new impacts, increase impacts, and there is no new information of substantial importance than identified within the GPU EIR.

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

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

Conclusion

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

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

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

Discussion

A CAP Consistency Review Checklist was prepared for the project by Chambers Group. The following responses have incorporated the analysis from the report.

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

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

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

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

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

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

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

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

As previously described, the proposed self storage facility would be consistent with the Limited Impact Industrial (I-1) land use and Limited Impact Industrial (M52) zoning designations for the site. Therefore, the project may rely on the CAP for the cumulative impacts analysis of GHG emissions under CEQA.

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

1. The project will achieve Tier 2 status as set forth in the 2022 California Green Building Standards Code (CALGreen), Title 24, Part 11, Appendix A5 Nonresidential Voluntary Measures, Division A5.6, Tier 2.
2. The project will ensure that the newly constructed commercial storage buildings comply with 2022 CALGreen Section A5.601.3, Tier 2 for energy efficiency.
3. The project will comply with 2022 CALGreen Section A5.303.2.3.2 Tier 2 Water Efficiency and Conservation Requirements and use three elective measures from Sections A5.303, A5.304, and A5.305 as follows:
 - A5.303.2.3.2 Tier 2 – 20-percent savings.
 - A5.304.2 Outdoor water use.
 - A5.304.6 Restoration of areas disturbed by construction.
4. Comply with the County's Water Conservation in Landscaping Ordinance with automatically controlled efficient system and use of native plant species and non-invasive drought tolerant/low water use plants in landscaping plan.
5. Comply with the County's Grading Ordinance and SDAPCD's fugitive dust rules outlined in Section 87.426 of the County's Grading Ordinance.
6. Utilize architectural coatings compliant with SDAPCD Rule 67.
7. Utilize low-VOC thermal insulation

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

The measures above are also consistent with County General Plan mitigation measures CC-1.1, CC-1.11, CC-1.17, which encourage incentives for energy efficient development, implementation of the Ordinance Relating to Water Conservation for Landscaping, and implementation of a construction waste recycling program.

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

- 8(b) The GPU EIR concluded this impact to be less than significant. As described above, the project would not result in a cumulatively considerable contribution to global climate change with implementation of GPU mitigation measures CC-1.1, CC-1.11, CC-1.17, which encourage incentives for energy efficient development, implementation of the Ordinance Relating to Water Conservation for Landscaping, and implementation of a construction waste recycling program. As such, the project would be consistent with County goals and policies included in the County General Plan that address GHG reductions.

The project is consistent with the County's General Plan land use designation of Limited Impact Industrial (I-1). Through its goals, policies, and land use designations, the County's General Plan aims to reduce countywide GHG emissions. The project would result in a less than significant impact from VMT. Therefore, the project would not conflict with SANDAG's recently adopted San Diego Forward: the 2021 Regional Plan, which includes a Sustainable Communities Strategy (SCS) as required by SB 375. Because the project's proposed land uses are consistent with the County's General Plan land use designation, the project would not conflict with the General Plan or SANDAG's Regional Plan and would not result in growth beyond what was assumed in the regional growth forecasts. Therefore, the project's impacts related to GHG emissions would be less than significant.

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

Conclusion

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

1. No peculiar impacts to the project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.

3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. No mitigation measures contained within the GPU EIR would be required because project specific impacts would be less than significant.

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

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

☐☐☐

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

☐☐☐

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

☐☐☐

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

☐☐☐

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

☐☐☐

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

☐☐☐

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

☐☐☐

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



Discussion

A Phase I Environmental Site Assessment (ESA) was prepared for the proposed project by RSB Environmental dated May 8, 2024. The following responses have incorporated the analysis from the report.

- 9(a) The GPU EIR concluded this impact to be less than significant. Project construction would involve the transport of gasoline and other petroleum-based products associated with construction equipment. These materials are considered hazardous as they could cause temporary localized soil and water contamination. Incidents of spills or other localized contamination could occur during refueling, operation of machinery, undetected fluid leaks, or mechanical failure. However, all storage, handling, and disposal of these materials are regulated by the California Department of Toxic Substances Control, the USEPA, and the North County Fire Protection District. In addition, a Phase I Environmental Site Assessment was prepared for the project site. The assessment revealed no evidence of a recognized environmental condition in connection with project site. The project would not result through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

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

All construction and operational activities involving the transportation, usage, and disposal of hazardous materials would be subject to all applicable federal, state, and local requirements, which would reduce impacts associated with the use and handling of hazardous materials during construction to less than significant. Therefore, the project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials, and impacts would be less than significant.

As previously discussed, the GPU EIR determined impacts from transport, use and disposal of hazardous materials and accidental release of hazardous materials to be less than significant. The proposed project would have a less-than-significant impact for the reasons detailed above. Thus, the project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 9(b) The GPU EIR concluded this impact to be less than significant. The project is not located within 0.25 miles of an existing or proposed school. The closest school is La Paloma Elementary School, approximately 0.34 miles from the project site. The project does not propose any hazardous emissions or handling of hazardous or acutely hazardous materials or substances. Furthermore, the project is required to comply with applicable regulations pertaining to hazardous waste to ensure that impacts related to hazardous emissions and schools is less than significant.

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

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

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

- 9(d) The GPU EIR concluded this impact to be less than significant with mitigation. The project is located within the Marine Corps Air Station (MCAS) Camp Pendleton and Fallbrook Community Airpark Airport Influence Area (AIA). The project site is not located in the Safety Zone, Noise Contour, Overflight, or Avigation Easement for both airports. Federal Aviation Administration conducted an aeronautical study that determined that the structure would have no substantial adverse effect on the safe and efficient utilization of the navigable airspace by aircraft or on the operation of air navigation facilities. The project would be required to submit Form FAA 7460-1 – Notice of Proposed Construction or Alteration to the Federal Aviation Association prior to approval or issuance of any building permit. Therefore, the project would not constitute a safety hazard for people residing or working in the project area.

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

- 9(e) The GPU EIR concluded this impact to be less than significant with mitigation. The proposed project is not located within 2 miles of a private airpark. Therefore, the project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 9(f)(i) OPERATIONAL AREA EMERGENCY PLAN AND MULTI-JURISDICTIONAL HAZARD MITIGATION PLAN:

The GPU EIR concluded this impact to be less than significant with mitigation. The project would not interfere with this plan because it would not prohibit subsequent plans from being established or prevent the goals and objectives of existing plans from being carried out.

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

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

The project is not located along the coastal zone.

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

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

9f)(v) DAM EVACUATION PLAN:

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

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

9(g) The GPU EIR concluded this impact as significant and unavoidable. The project is within the Local Responsibility Area (LRA) and is not located within a Very High Fire Hazard Severity Zone (FHSZ). The project would not expose people or structures to a significant risk of loss, injury or death involving wildland fires because the project would comply with the regulations relating to emergency access, water supply, and defensible space specified in the Consolidated Fire Code for the 16 Fire Protection Districts in San Diego County. Implementation of these fire safety standards would occur during the grading permit and/or building permit process. Therefore, based on the location of the project and review of the project by County staff, through compliance with the Consolidated Fire Code and through compliance with the San Diego County Fire Authority, the project is not anticipated to expose people or structures to a significant risk of loss, injury, or death involving hazardous wildland fires. Moreover, the project would not contribute to a cumulatively considerable impact, because all past, present, and future projects in the surrounding area are required to comply with the Consolidated Fire Code.

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

9(h) The GPU EIR concluded this impact as less than significant. The project does not involve or support uses that allow water to stand for a period of 72 hours (3 days) or more (e.g., artificial lakes, agricultural irrigation ponds). Also, the project does not involve or support uses that would produce or collect animal waste, such as equestrian facilities, agricultural operations (chicken coops, dairies etc.), solid waste facility or other similar uses. Therefore, the project would not substantially increase exposure to vectors, including mosquitoes, rats, or flies.

As previously discussed, the GPU EIR determined less than significant impacts with mitigation from vectors. The proposed project would also have a less-than-significant impact. Therefore, the project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

Conclusion

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

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

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
10. Hydrology and Water Quality – Would the Project:			
a) Violate any waste discharge requirements?	☐	☐	☐
b) Is the project tributary to an already impaired water body, as listed on the Clean Water Act Section 303(d) list? If so, could the project result in an increase in any pollutant for which the water body is already impaired?	☐	☐	☐
c) Could the proposed project cause or contribute to an exceedance of applicable surface or groundwater receiving water quality objectives or degradation of beneficial uses?	☐	☐	☐
d) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	☐	☐	☐
e) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	☐	☐	☐

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

Discussion

A Drainage Report was prepared for the proposed project by Omega Engineering Consultants dated August 7, 2026. In addition, a Priority Development Plan (PDP) Stormwater Quality Management Plan (SQMP) was prepared for the proposed project by Omega Engineering Consultants, dated August 7, 2026. The following responses have incorporated the analysis from the reports.

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

During the construction phase, the project would prepare and implement a SWPPP. The SWPPP would implement typical erosion control BMPs, such as hydraulic stabilization hydroseeding on disturbed slopes; use of mulch, straw, wood chips, and soil application on disturbed flat areas, energy dissipater outlet protection for water velocity control; fiber rolls, gravel and sand bags, storm drain inlet protection for sediment control; stabilized construction entrance for offsite tracking of sediment; and measures to control materials management and waste management. The SWPPP would be prepared in accordance with Order No. 2009-009-DWQ, National Pollutant

Discharge Elimination System (NPDES) Order CAS000002 Construction General Permit adopted by the State Water Resources Control Board (SWRCB) on September 2, 2009.

During the post-construction phase, as outlined in the Drainage Report and Grading Plan, the project would implement site design, and source control BMPs to prevent potential pollutants from entering storm water runoff in accordance with the County of San Diego BMP Design Manual (2019) and SDRWQCB Order No. R9-2013-0001 Municipal Separate Storm Sewer System (MS4) permit (2013), as adopted by the RWQCB on May 8, 2013.

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

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

- 10(b) The GPU EIR concluded this impact to be significant and unavoidable. The project site lies in the Upper Ysidora (902.13) hydrologic sub-area within the Santa Margarita hydrologic unit. According to the Clean Water Act section 303(d) list Santa Margarita River Estuary / Lagoon is listed for eutrophic conditions caused by excessive nutrient loading (nitrogen and phosphorus) and the Lower Santa Margarita River is listed for nutrients (phosphorus and nitrogen) as well as enterococcus and coliform bacteria. The project could contribute to release of these pollutants; however, the project would comply with the WPO and implement site design measures and source control BMPs to prevent a significant increase of pollutants to receiving waters.

As previously discussed, the GPU EIR determined significant and unavoidable impacts to water quality standards and requirements. However, the project would have a less-than-significant impact to water quality standards with the implementation of project conditions listed in Section 10(a). The conditions are consistent with the GPU EIR mitigation measures Hyd-1.2 through Hyd-1.5. Therefore, the project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 10(c) The GPU EIR concluded this impact to be significant and unavoidable. As stated in Sections 10(a) and 10(b) above, implementation of BMPs and compliance with required ordinances would ensure that project impacts are less than significant.

As previously discussed, the GPU EIR determined significant and unavoidable impacts to water quality standards and requirements and groundwater supplies and recharge. However, the proposed project would have a less-than significant impact to water quality standards and groundwater supplies and recharge with the implementation of project conditions listed in Section 10(a), which are consistent with GPU mitigation measures Hyd-1.2 through Hyd-1.5. Therefore, the project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 10(d) The GPU EIR concluded this impact to be significant and unavoidable. The project is within the service area of the Fallbrook Public Utility District that obtains water from imported sources. The project would not use groundwater for its potable water supply. The project would incrementally increase demand for potable water and non-potable water for irrigation. Given that Water Management Plans use projections in local planning documents and that the project is consistent with the County General Plan land use designation and zoning, potable water demands of the project (that would include groundwater) would be similar to those accounted for in Fallbrook Public Utility District 2025 Urban Water Management Plan. Consequently, significant impacts to groundwater resources are not anticipated with development of the project. In addition, the project does not involve operations that would interfere substantially with groundwater recharge. In addition, the project does not involve operations that would interfere substantially with groundwater recharge.

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

- 10(e) The GPU EIR concluded this impact to be less than significant with mitigation. The project would not result in substantial erosion or siltation on or off-site because storm water quality management plans are prepared for both the construction and post-construction phases of the development project. During the construction phase, the project would prepare and implement a SWPPP. The SWPPP would implement typical erosion control BMPs, such as hydraulic stabilization hydroseeding on disturbed slopes; mulch, straw, wood chips, and soil application on disturbed flat areas, energy dissipater outlet protection for water velocity control; fiber rolls, gravel and sand bags, storm drain inlet protection for sediment control; stabilized construction entrance for offsite tracking of sediment; and measures to control materials management and waste management.

Preconstruction, the northern edge of the site drains to the natural small creek immediately north of the site, which connects to the existing storm drain pipes northwest of the project site. The central portion of the project site flows to the northwesterly corner of the site, which drains to the existing connection storm drains immediately northwest of the site. Post construction, the development of the project site would modify the onsite drainage patterns, but the discharge points locations would remain unchanged. The northern half of the developed site would drain via rain gutters and surface flow, in a northerly direction to the northeasterly biofiltration basin (BMP-1) then from the basin, stormwater would drain to the existing storm drain pipes immediately northwest of the project site. The southern half of the developed site would drain via rain gutters and surface flow to a pipe along the central westerly edge of the project site, which would carry the flow from the southern half of the site in a northerly direction to the northwesterly biofiltration basin (BMP-2) then from the basin, stormwater would flow via an emergency weir to an overflow pipe to the existing storm drain pipes immediately northwest of the project site. The proposed biofiltration basins would meet the pollutant control, hydromodification control and flood control (100-year) requirements.

The SWPPP would be prepared in accordance with Order No. 2009-009-DWQ, NPDES Order CAS000002 CGP adopted by the SWRCB on September 2, 2009. During the post-construction phase, as outlined in the PDP SWQMP dated August 7, 2026, the project would implement site design and source control BMPs to prevent potential pollutants from entering storm water runoff. The SWQMP would be prepared in accordance with the County of San Diego BMP Design Manual

(2019) and SDRWQCB Order No. R9-2013- 0001 Municipal Separate Storm Sewer System (MS4) permit (2013), as adopted by the RWQCB on May 8, 2013.

The SWPPP and SWQMP specify and describe the implementation process of all BMPs that would address equipment operation and materials management, prevent the erosion process from occurring, and prevent sedimentation in any onsite and downstream receiving waters. The Department of Public Works would ensure that these Plans are implemented as proposed. The alterations to the onsite drainage patterns would not result in erosion.

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

- 10(f) The GPU EIR concluded this impact to be less than significant with mitigation. The Drainage Report determined that the proposed project would not alter the existing drainage pattern in a manner which would result in flooding on- or off-site. See Section 10(e) for further discussion on on-site drainage patterns. The proposed improvements result in a decrease in peak flowrates at Discharge Point #1 for the 6-hour, 100-year storm due to the attenuation properties of the proposed biofiltration basins and would not result in flooding on or off site.

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

- 10(g) The GPU EIR concluded this impact to be less than significant with mitigation. Pursuant to the Drainage Report prepared for the project, and as described above in Section 10(e) and 10(f), the proposed would modify the onsite drainage patterns, but the discharge points locations will remain unchanged. The proposed improvements result in a decrease in peak flowrates at the discharge point for the 6-hour, 100-year storm due to the attenuation properties of the proposed biofiltration basins consistent with GPU mitigation measures (Hyd-1.2 through Hyd-1.5).

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

- 10(h) The GPU EIR concluded this impact to be significant and unavoidable. The project has the potential to generate pollutants. The two proposed biofiltration basins would meet the pollutant control, hydromodification control and flood control (100-year) within the basin layers

As previously discussed, the GPU EIR determined impacts to water quality standards and requirements as significant and unavoidable. However, the proposed project would have a less-than-significant impact to water quality standards with the implementation of project conditions listed in Section 10(a). The conditions are consistent with the GPU EIR mitigation measures Hyd-

1.2 through Hyd-1.5. Therefore, the project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 10(i) The GPU EIR concluded this impact to be less than significant with mitigation. No Federal Emergency Management Agency (FEMA) or County-mapped floodplains were identified on the project site. The project site is identified by FEMA as an “Area of Minimal Flood Hazard.” Additionally, no habitable structures are proposed as part of the project. Therefore, the project would not place housing within a County or federal floodplain or flood way.

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

- 10(j) The GPU EIR concluded this impact to be less than significant with mitigation. No FEMA or County-mapped floodplains were identified on the project site. The project site is identified by FEMA as an “Area of Minimal Flood Hazard.” Additionally, no habitable structures are proposed as part of the project. Therefore, the project would not place housing within a County or federal floodplain or flood way.

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

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

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

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

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

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

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

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

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

Conclusion

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

- 1. No peculiar impacts to the project or its site have been identified.
- 2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
- 3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
- 4. Feasible mitigation measures contained within the GPU EIR (Hyd-1.2 through Hyd-1.5) would be applied to the project. The mitigation measures, as detailed above, requires the project applicant to comply with the guidelines for determining significance for Hydrology and Water Quality as well as for Dam Inundation, the Watershed Protection Ordinance, Stormwater Standards Manual, and the Resource Protection Ordinance.

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

Discussion

11(a) The GPU EIR concluded this impact to be less than significant with mitigation. The project proposes the development of a self-storage facility on a lot that is surrounded by the shared private driveway and industrial uses to the west, a San Diego Gas & Electric battery storage facility to the east, single-family homes to the north, and vacant land and single-family homes to the south. No component of the project would introduce a barrier or division to, or otherwise result in a conflict with, the surrounding residential development or other established community.

Because the project would occur within existing parcel boundaries, the proposed project would not significantly disrupt or divide the established community.

As previously discussed, the GPU EIR concluded physically dividing an established community as less than significant with mitigation. However, the proposed project would have no impact for the reasons detailed above. Therefore, the project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 11(b) The GPU EIR concluded this impact to be less than significant. The project proposes the development of a commercial storage facility, which is consistent with the Limited Impact Industrial land use and zoning designations for the project site. Surrounding land uses consist of industrial uses to the west, a San Diego Gas & Electric battery storage facility to the east, single-family homes to the north, and vacant land and single-family homes to the south. The project does not conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, impacts would be less than significant.

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

Conclusion

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

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

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
12. Mineral Resources – Would the Project:			
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☐

- 12(a) The GPU EIR determined that impacts to mineral resources would be significant and unavoidable. The project site is classified by the California Department of Conservation – Division of Mines and

Geology as MRZ-3 Resources Potentially Present. The project site is surrounded by developed rural commercial and rural residential land uses which would be incompatible with future extraction of mineral resources on the project site. A future mining operation at the project site would create a significant impact to neighboring properties for issues such as noise, air quality, traffic, and possibly other impacts. Therefore, implementation of the project would not result in the loss of availability of a known mineral resource that would be of value since the mineral resource extraction would not occur at the site due to incompatible land uses.

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

- 12(b) The GPU EIR concluded this impact to be significant and unavoidable. The project site is not designed in a Mineral Resource Zone designed in the General Plan, nor is it located within 1,300 feet of such lands. Therefore, the project would not result in the loss of availability of locally important mineral resource(s). Therefore, no potentially significant loss of availability of a locally important mineral resource recovery (extraction) site delineated on a local general plan, specific plan, or other land use plan would occur as a result of this project. The project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

Conclusion

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

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

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
13. Noise – Would the Project:			
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☐
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	☐

d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

☐ ☐ ☐

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

☐ ☐ ☐

f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

☐ ☐ ☐

Discussion

A Noise Impact Analysis was prepared by Vista Environmental, dated August 26, 2025. The following responses have incorporated the analyses from the report.

- 13(a) The GPU EIR concluded this impact to be less than significant with mitigation. The project site is zoned Limited Impact Industrial (M52) and surrounding properties are zoned Limited Impact Industrial (M52) and Rural Residential (RR). The project would not expose people to potentially significant noise levels that exceed the allowable limits of the General Plan, Noise Ordinance, or other applicable standards for the following reasons:

Noise Ordinance – Section 36-404: Non-transportation noise generated by the project is not expected to exceed the standards of the Noise Ordinance at or beyond the project's property line. The project site and properties to the east, south, and west are zoned Limited Impact Industrial, (M52) and the properties to the north are zoned Rural Residential (RR). As such, the operational noise standards are different for the adjacent properties with different zoning. The County Noise Ordinance Section 36.404(e) states that if the project site is located on the boundary of two zones, the noise standard is the arithmetic mean of the two zones. Since the Project has the potential to operate at any time of the day, for the properties that have both day and night noise standards, only the worst-case nighttime noise standard has been utilized in this analysis.

The project may create an increase in onsite noise levels from noise created from the operation of the self storage facility. The operational noise levels calculated at the adjacent property are shown below in Table 5 Operational Noise Levels (Nearest Property Line) for the nearest property line.

Table 5: Operational Noise Levels at the Adjacent Property Lines

Adjacent Property Location	Distance from Facility to Property Line (feet)	Calculated Noise Level (dBA Leq)	County Noise Standard (dBA Leq 1 hour)	Exceed Noise Standard
North	50	46.4	57.5	No
East	10	60.4	70	No
South	40	48.4	70	No
West	30	50.9	70	No

Source: Vista Environmental 2025

As shown, the operational noise level created at all adjacent property lines would be within the County noise standards.

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

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

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

- 13(b) The GPU EIR concluded this impact to be less than significant with mitigation. The project does not propose any blasting or rock crushing during the grading operations. In addition, project operation does not involve any vibration producing equipment that would exceed applicable vibration levels at the adjoining property line.

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

- 13(c) As indicated in the response listed under Section 13(a), the project is a self storage facility and would not expose existing or planned noise sensitive areas in the vicinity to a substantial permanent increase in noise levels that exceed the allowable limits of any applicable noise standards. In addition, the proposed self storage facility would generate 203 daily vehicle trips which would not be considered an excessive amount of trips above what was anticipated in the General Plan. Therefore, the project's roadway noise impacts would be negligible and would not result in a quantitative increase in roadway noise levels.

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

- 13(d) The GPU EIR concluded this impact to be less than significant with mitigation. The project does not involve any operational uses that may create substantial temporary or periodic increases in ambient noise levels in the project vicinity. Temporary construction noise was assessed and would be subject to the County 75 dBA eight-hour average requirement at the boundary of any occupied property, specifically an existing residence.

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

- 13(e) The GPU EIR concluded this impact to be less than significant with mitigation. The project is located within the Fallbrook Community Airpark MCAS Camp Pendleton AIA. However, it is not located within the designated Noise Contours. Therefore, the project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

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

Conclusion

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

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

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

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

☐☐☐

Discussion

- 14(a) The GPU EIR concluded this impact to be less than significant. The project proposes development of a self-storage facility that is surrounded by similar industrial uses and rural single-family residences. The project would not provide housing or otherwise induce population growth. The proposed project is consistent with the existing land use and zoning designations for the site. Therefore, implementation of the proposed project would not directly or indirectly induce substantial unplanned population growth, and impacts would be less than significant.

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

- 14(b) The GPU EIR concluded this impact to be less than significant. The project site is currently vacant and would not displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere. The proposed project is consistent with the existing land use and zoning designations for the site. Therefore, implementation of the proposed project would not directly or indirectly induce substantial unplanned population growth, and impacts would be less than significant.

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

- 14(c) The GPU EIR concluded this impact to be less than significant. The project site is currently vacant and would not displace substantial numbers of existing people, necessitating the construction of replacement housing elsewhere. Impacts would be less than significant.

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

Conclusion

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

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

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
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15. Public Services – Would the Project:

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

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Discussion

15(a) The GPU EIR concluded this impact to be less than significant with mitigation, with the exception of school services, which remained significant and unavoidable. The project includes development of a self-storage facility, which is consistent with the existing Limited Impact Industrial land use and zoning designations for the site. The project would not result in population growth and therefore would not result in the need for significantly altered public services or facilities including, but not limited to, fire protection facilities, sheriff facilities, schools, or parks in order to maintain acceptable service ratios, response times, or other performance service ratios or objectives for any public services. The self-storage facility would be served by existing public services. The self-storage facility would not result in increased demand for existing neighborhood and regional parks or other recreational facilities. Therefore, the project would not result in the need for new or physically altered governmental facilities, the construction of which would cause a significant impact on the environment. Impacts would be less than significant. The project's effect on public parks is discussed in response 16(a) and response 16(b).

Based on the discussion above, the project would not result in the need for significantly altered services or facilities. As previously discussed, the GPU EIR determined impact to fire protection services, police protection services, and other public services as significant with mitigation, while school services remained significant and unavoidable. However, as the project would have a less-than-significant impact for the reasons stated above, the project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

Conclusion

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

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

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

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
16. Recreation – Would the Project:			
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☐
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?	☐	☐	☐

Discussion

16(a) The GPU EIR concluded this impact to be less than significant with mitigation. The project includes development of a self-storage facility, which is consistent with the existing Limited Impact Industrial (M52) land use and zoning designations for the site. Surrounding land uses consist of industrial development to the east, south, and west and rural single-family residences to the north. The self-storage facility would not increase local population or otherwise the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated. Impacts would be less than significant.

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

16(b) The GPU EIR concluded this impact to be less than significant with mitigation. The project does not include recreational facilities or require the construction or expansion of recreational facilities. Therefore, the project would have no impact from the construction or expansion of recreational facilities.

As previously discussed, the GPU EIR determined impacts related to construction of new recreational facilities to be less than significant. As the proposed project would have no impact for the reasons detailed above, the project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

Conclusion

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

1. No peculiar impacts to the project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.

3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. No mitigation measures contained within the GPU EIR would be required because project specific impacts would be less than significant.

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

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

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

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c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

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

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e) Result in inadequate emergency access?

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f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

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Discussion

- 17(a) The GPU EIR concluded this impact to be significant and unavoidable. The project would develop a self-storage facility that would serve the community of Fallbrook. The proposed project would not interfere with existing pedestrian, bicycle, and transit facilities surrounding the project site. Therefore, the project would not conflict with an applicable plan, ordinance or policy establishing

measures of the effectiveness for the performance of the circulation system and impacts would be less than significant.

As previously discussed, the GPU EIR determined significant and unavoidable impacts to unincorporated County traffic and LOS standards. The County standard for the LOS on Mobility Element roads is LOS D. An objective of the GPU is to plan for growth while preserving the County's environmental, cultural, and historical resources. The project would have a less-than-significant impact therefore, the project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

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

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

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

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

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

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

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

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

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

The project includes a commercial storage facility that would serve the community of Fallbrook. Pursuant to the current CEQA Guidelines the project would be "locally serving" and would not be required to prepare a VMT analysis.

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

- 17(c) The GPU EIR concluded this impact to be less than significant with mitigation. The project is located within the Fallbrook Community Airpark and MCAS Camp Pendleton AIA. The project site is not located in the Safety Zone, Noise Contour, Overflight, or Avigation Easement for both

airports. Federal Aviation Administration conducted an aeronautical study that determined that the structure would have no substantial adverse effect on the safe and efficient utilization of the navigable airspace by aircraft or on the operation of air navigation facilities. The project would be required to submit Form FAA 7460-1 – Notice of Proposed Construction or Alteration to the Federal Aviation Association prior to approval or issuance of any building permit. The project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 17(d) The GPU EIR concluded this impact to be significant and unavoidable. The proposed project would not substantially alter traffic patterns, roadway design, place incompatible uses (e.g., farm equipment) on existing roadways, or create curves, slopes or walls which would impede adequate sight distance on a road. Vehicular access is provided along an existing access road within a north-south easement abutting the western property boundary that intersects with East Mission Road. The project proposes paving a private road within this access easement. A 24-foot-wide fire lane loops around the interior buildings of the site. The private road and fire lane loop would be constructed per County Roadway Standards.

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

- 17(e) The GPU EIR concluded this impact to be less than significant with mitigation. The proposed project would not result in inadequate emergency access. Vehicular access is provided along an existing access road within a north-south easement abutting the western property boundary that intersects with East Mission Road. The project proposes paving a private road within this access easement. A 24-foot-wide fire lane loops around the interior buildings of the site. In addition, consistent with GPU EIR mitigation measure Tra-4.2, the project would implement the Building and Fire codes to ensure emergency vehicle accessibility.

As previously discussed, the GPU EIR determined impacts on emergency access as less than significant with mitigation. As the project would have a less-than-significant impact with the implementation of project conditions of approval for adherence to the building and fire codes, consistent with GPU EIR mitigation measure Tra-4.2. The project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 17(f) The GPU EIR concluded this impact to be less than significant with mitigation. The project would not result in the construction of any road improvements or new road design features that would interfere with the provision of public transit, bicycle, or pedestrian facilities. In addition, the project does not generate sufficient travel demand to increase demand for transit, bicycle, or pedestrian facilities.

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

Conclusion

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

1. No peculiar impacts to the project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. Feasible mitigation measures contained within the GPU EIR would be applied to the project. The mitigation measures, as detailed above, would require the project applicant to comply with the County Public Road Standards, Guidelines for Determining Significance, coordinate with other jurisdictions to identify appropriate mitigation and implement the Building and Fire Codes to ensure adequate services are in place.

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

- a) Cause a substantial adverse change in the significance of a tribal cultural resource, as defined in Public Resources Code §21074 as either a site, feature, place, or cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

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- i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of Historical Resources as defined in Public Resources Code §5020.1(k), or
- ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to 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.

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Discussion

Tribal Cultural Resources was not specifically analyzed within the GPU EIR as a separate issue area under CEQA. At the time, archaeological resources and human remains were discussed under GPU EIR Section 2.5 Cultural and Paleontological Resources. In 2015, the issue of Tribal Cultural Resources was separated into its own section within Appendix G of the CEQA Guidelines to incorporate the two issue questions above. The GPU EIR did address these issues within the analysis; however, they were not called out as separate issue areas. Within the GPU EIR, the issue of Tribal Cultural Resources was determined to be significant with mitigation.

- 18(a) Based on an analysis of records and a survey of the property, it has been determined that no archaeological resources were identified. A cultural survey was conducted in 2018 for a prior approval (PDS2019-ZAP-19-001), and a 1956 historic residence was identified and determined to not be a significant resource under CEQA. The residence has since been removed. The results of the survey are provided in a cultural resources report titled, "Cultural Resources Survey Report for the AES Fallbrook Project, Fallbrook, California" (October 2018), prepared by Shelby Castells.

Notification of the project was provided to six tribes (Pala, Pechanga, Rincon, San Luis Rey, San Pasqual, and Soboba). Two tribes responded (Pala and Rincon), and meetings with each tribe has been conducted. No tribal cultural resources have been identified within the project site; however, they are present in the surrounding vicinity.

Although no resources were identified during the site survey, the potential exists for subsurface deposits because of dense vegetative cover on portions of the property which limited ground visibility. Additionally, several recorded archaeological sites are located within the vicinity of the project. As a precautionary measure for any inadvertent discoveries, the project will still be conditioned to include Archaeological and Tribal Monitoring, as well as a Cultural Resources Treatment Agreement and Preservation Plan throughout all grading activities.

As previously stated, Tribal Cultural Resources were analyzed within the GPU EIR within Section 2.5, Cultural and Paleontological Resources, and was determined to be significant with mitigation. As considered by the GPU EIR, potential impacts to cultural resources will be mitigated through ordinance compliance and through implementation of the following mitigation measures: archaeological and tribal monitoring in conformance with the County's Cultural Resource Guidelines if resources are encountered. The GPU EIR identified these mitigation measures as Cul 2.5. The project would be conditioned with archaeological and tribal monitoring (Cul-2.5), and a treatment and preservation plan. Therefore, the project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

Conclusion

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

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

4. Feasible mitigation measures contained within the GPU EIR would be applied to the project (Cul-2.5).

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
19. Utilities and Service Systems – Would the Project:			
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	☐	☐	☐
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☐
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☐
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	☐	☐	☐
e) Result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☐
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	☐	☐	☐
g) Comply with federal, state, and local statutes and regulations related to solid waste?	☐	☐	☐

Discussion

- 19(a) The GPU EIR concluded this impact to be less than significant with mitigation. The project includes development of a commercial storage facility, which is consistent with the Limited Impact Industrial (I-1) land use and zoning designations for the project site. The project is located within the Fallbrook Public Utility District boundaries. The project does not propose to discharge domestic waste to on-site wastewater systems (OSWS), also known as septic systems. Therefore, the project would be consistent with the wastewater treatment requirements of the RWQCB.

As previously discussed, the GPU EIR determined impacts on wastewater treatment requirements as less than significant with mitigation. As the proposed project would have a less-

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

- 19(b) The GPU EIR concluded this impact to be less than significant with mitigation. The project includes development of a self-storage facility, which is consistent with the Limited Impact Industrial land use and zoning designations for the project site. The project site and existing surrounding residences are served by Fallbrook Public Utility District. Therefore, the project would not require the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.

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

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

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

- 19(d) The GPU EIR concluded this impact to be significant and unavoidable. The project would receive water from the Fallbrook Public Utility District, which has adequate water to serve the commercial storage facility. For instance, the proposed commercial storage facility is consistent with the Limited Impact Industrial) land use and zoning designations for the project site and therefore, was planned for in Fallbrook Public Utility District water demand projections. The self-storage facility would result in negligible long-term operational water demand. As the proposed project would have a less-than-significant impact, the project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 19(e) The GPU EIR concluded this impact to be less than significant with mitigation. The project would require wastewater services from the Fallbrook Public Utility District, which has adequate services available to serve the self-storage facility. Therefore, the project would not interfere with any wastewater treatment provider's service capacity.

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

- 19(f) The GPU EIR concluded this impact to be significant and unavoidable. The project includes development of a commercial storage facility, which is consistent with the Limited Impact Industrial land use and zoning designations for the project site and therefore, was planned for in

the County's solid waste disposal projections. The self-storage facility would result in negligible long-term operational solid waste generation. All solid waste facilities, including landfills require solid waste facility permits to operate. There are five, permitted active landfills in San Diego County with remaining capacity to adequately serve the project. Therefore, the project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

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

Conclusion

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

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

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
20. Wildfire – If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the Project:			
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☐
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts in the environment?	☐	☐	☐
d) Expose people or structures to significant risk, including downslopes or downstream flooding or landslides, as a result of runoff, post-fire instability, or drainage changes?	☐	☐	☐

Discussion

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

- 20(a) The GPU EIR concluded this impact to be significant and unavoidable. The site is located within LRA. The project site is within the authority of the North County Fire Protection District and is located approximately 5.7 miles (driving distance) from the nearest fire station, which is located at 4375 Pala Mesa Drive. Access would be provided by an existing access road off East Mission Road. An electronic security gate would control access to the self-storage facility at the proposed driveway and would be equipped with a Knox override switch to provide emergency access.

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

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

As previously stated, Wildfire was analyzed within the GPU EIR within Section 2.7, Hazards and Hazardous Materials and was determined to be significant and unavoidable. However, the proposed project would have a less-than-significant impact with the implementation of GPU EIR mitigation measures Haz-4.2 and Haz-4.3 for the implementation of brush management and compliance with the building and fire codes. Therefore, the project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 20(c) The GPU EIR concluded this impact to be significant and unavoidable. The project would require the installation and maintenance of the existing access road, project driveway, internal roads, and landscaped areas. The project also requires utility connections for service from the Fallbrook Public Utility District. These proposed improvements would not exacerbate fire risk. All infrastructure associated with the project has been incorporated within this analysis. Therefore, no additional temporary or ongoing impacts to the environment related to associated infrastructure would occur that have not been analyzed in other sections of this environmental document.

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

- 20(d) The GPU EIR concluded this impact to be significant and unavoidable. As previously stated in Section 19(b), the project would comply with regulations relating to emergency access, water supply, and defensible space specified in the County Fire Code and Consolidated Fire Code. The project site is not within a landslide susceptibility category as identified by the California Department of Conservation or in the County Guidelines for Determining Significance for Geologic Hazards. In order to assure that any proposed buildings are adequately supported, a Soils Engineering Report is required as part of the grading and building permit process. This Report would evaluate the strength of underlying soils and make recommendations on the design of building foundation systems. The Soils Engineering Report must demonstrate that a proposed building meets the structural stability standards required by the California Building Code. The report must be approved by the County prior to the issuance of a building permit. Therefore, for the reasons stated above, the project site would not expose people or structures to significant risk, including downslopes or downstream flooding or landslides, as a result of runoff, post-fire instability, or drainage changes.

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

Conclusion

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

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

Appendices

Appendix A – Technical Studies and References

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

Appendix A

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

Air Quality and Greenhouse Gas Emissions and Energy Consumption Technical Memorandum. Vista Environmental. August 26, 2025.

Biological Resources Report. Chambers Group. June 2026.

CAP Consistency Review Checklist. Harris & Associates.

Cultural Resources Survey Report for the AES Fallbrook Project, Fallbrook, California" Shelby Castells. October 2018

Drainage Study. Omega Engineering. August 7, 2026

Geological Technical Investigation. GEOCON. November 11, 2025

Noise Impact Analysis. Vista Environmental. August 26, 2025

Phase I Environmental Site Assessment RSB Environmental. May 8, 2024.

Stormwater Quality Management Plan for Priority Development Projects Omega Engineering. August 7, 2026

Site Access Assessment. LLG Engineering. September 15, 2026

References

For a complete list of technical studies, references, and significance guidelines used to support the analysis of the GPU Final Certified Program EIR, dated August 3, 2011, please visit the County's website at: [http://www.sdcounty.ca.gov/PDS/gpupdate/docs/BOS_Aug2011/EIR/FEIR_5.00 -
References_2011.pdf](http://www.sdcounty.ca.gov/PDS/gpupdate/docs/BOS_Aug2011/EIR/FEIR_5.00_-_References_2011.pdf)

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