



County of San Diego

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November 19, 2020

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

Project Name: Lemon Crest Tentative Map
Project Record Numbers: PDS2014-TM-5582
Environmental Log Number: PDS2014-ER-14-14-005
APN: 394-290-28-00

Lead Agency Name and Address:
County of San Diego
Planning and Development Services
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County Staff Contact:
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Project Location:
The Lemon Crest Tentative Map project site is located at 12361 Lemon Crest Drive, in the Lakeside Community Planning area, within the unincorporated San Diego County, approximately 21 miles east of the Pacific Ocean and 19 miles north of the United States/Mexico border.

Project Applicant Name and Address:
Bob Stewart
1150 Anchorage Lane, #101
San Diego, CA 92106

General Plan

Community Plan: Lakeside
Regional Categories: Village
Land Use Designations: Village Residential
Density: VR-2 (2 dwelling units per gross acre)
Floor Area Ratio (FAR) None

Zoning

Use Regulation: Rural Residential (RR)
Minimum Lot Size: 0.5 dwelling unit per 1 acre
Special Area Regulation: None

Description of Project:

The proposed Lemon Crest Tentative Map project (project) is for the subdivision of a 17.16-acre project site into 24 residential lots, remainder lot, and associated improvements. The following improvements would be required as conditions of approval for the project: public road improvements on Lemon Crest Drive along project frontage (shifting of centerline, graded width of 40 feet, surfacing of 28 feet with curb, gutter and sidewalk); reconstruction of offsite driveways on the west side of Lemon Crest Drive; annexation into the San Diego County Sanitation District Lakeside Service Area with an approximate 900-foot long public sewer extension; construction of an approximate 900-foot long private road "Private Road A" (graded width of 28 feet, surfacing of 24 feet with gutters); construction of street lighting and fire hydrants; drainage design with tree well basins; and landscaping. A residential structure currently exists on-site and would be removed as part of the project. Grading for the project would be balanced on-site requiring the cut and fill of 124,250 cubic yards of material. Water and sewer services would be provided by the San Diego County Sanitation District Lakeside Service Area. Fire services would be provided by the Lakeside Fire Protection District, with Fire Station #1 the closest fire station to the project site located approximately 1-mile northwest at 9726 Riverview Avenue. School services for the project would be provided by the Grossmont Union High School District and the Lakeside Union School District.

Existing Site Conditions

The project site topography varies between a relatively gentle up-hill slope located on the northwest, to a moderately steep slope located on the northeast and eastern portion of the project site. Elevations of the steep portion of the site are 440 feet above sea level (ASL) at the base and 514 feet ASL at the peak/top of the slope. The peak of the combined hillsides produces a relatively smoothly curved and domed plateau, which extends for the length of the project site in a south to north configuration. Project site climate can be characterized as Mediterranean type climate with generally mild, wet winters, with the bulk of annual precipitation falling between January and March. Long, hot, and very dry summer seasons frequently occur with occasional, multi-year droughts. Onsite vegetation consists of approximately 12.79 acres of disturbed habitat, 3.17 acres of urban/developed land, and 0.94-acre Diegan Coastal Sage Scrub. No special features exist onsite including rock outcropping or geologic features.

Discretionary Actions:

The Discretionary permit for the project includes a Tentative Map (TM) to subdivide the 17.16-acre site into 24 lots with one remainder lot. The project is consistent with the residential density allowable under the County General Plan.

Overview of 15183 Checklist

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

General Plan Update Program EIR

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

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

Summary of Findings

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

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

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

The project would subdivide a 17.16-acre lot into 24 residential lots, with one remainder lot, which is consistent with the development density established by the General Plan and Certified by the GPU EIR. The project site is designated VR-2 by the General Plan, allowing for 2 single-family residences 1 gross acre. Therefore, the project is consistent with the density allocated by the General Plan and as evaluated in the GPU EIR.

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

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

In addition, as explained further in the 15183 Checklist below, all project impacts were adequately analyzed by the GPU EIR. The project could result in potentially significant impacts to Biological Resources, Cultural Resources, Hydrology and Water Quality, Noise, Public Services, Transportation and Traffic, and Wildfire. However, applicable mitigation measures specified within the GPU EIR have been made conditions of approval for this project.

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

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

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

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

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

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

_____ Signature	November 19, 2020 _____ Date
Jenna Roady _____ Printed Name	Land Use/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 Guidelines section 15183.

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

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

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

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
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1. AESTHETICS – Would the Project:

- | | | | |
|--|--------------------------|--------------------------|--------------------------|
| a) Have a substantial adverse effect on a scenic vista? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| c) Substantially degrade the existing visual character or quality of the site and its surroundings? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| d) Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Discussion

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

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

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

The project site is located within the Lakeside Community Planning area at 12361 Lemon Crest Drive. The closest RCAs to the site are the following: El Capitan Reservoir located approximately 1.10 miles east of the project site, and Rattlesnake Mountain located approximately 1.30 miles west of the project site. No views of the project site are available from El Capitan Reservoir; therefore, the project would not detract from any views from this RCA. Rattlesnake Mountain does not contain any designated trails or trails easement; therefore, the project would not detract from any views from this RCA. In addition, the

project site is surrounded by residential development and would be similar in bulk and scale. Therefore, the project would not detract from any views from the aforementioned RCAs. In addition, the project would not diminish any views of this RCA due to scale, distance, and consistency with surrounding development.

As previously discussed, the GPU EIR determined impacts on scenic vistas 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.

- 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 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.

No Scenic Highways designated by Caltrans are in proximity to the project site. The County General Plan also identifies roadways that are designated as scenic corridors within the Conservation and Open Space Element and have been included as part of the County Scenic Highway System. Designated scenic roadways located in the vicinity of the project site include the State Route 67 (SR-67), located approximately 0.62-mile north, and El Monte Road, located approximately 1.4 miles northeast. No direct views of the project site are available from either scenic corridors due to distance, intervening topography, and surrounding structures.

As previously discussed, the GPU EIR determined impacts on scenic resources 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.

- 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 existing visual character and quality of the project surroundings are characterized by residential development due to the site being bordered by residential properties on Lemoncrest Avenue and Janet Lane to the north and west, Rockcrest Lane to the south, Del sol Road to the southeast. In addition, Lemoncrest Elementary school exists just northeast of the project site. The project within the landscape would not detract from or contract with the existing visual character and/or quality of the surrounding area for the following reasons: conformance with the density allowed per the County of San Diego General Plan and Zoning Ordinance and consistency with surrounding residential use types. The residential buildings themselves are not proposed at this time. However, the future development would be required to conform to development regulations per the

County Zoning Ordinance, such as building height and setbacks from property lines. The project would be consistent with surrounding development bulk and scale. Thus, the project would not substantially degrade the existing visual character or quality of the site and its surroundings.

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

- 1(d) The GPU EIR concluded this impact to be significant and unavoidable. The project would use outdoor lighting but is not located within Zone A of the County of San Diego Light Pollution Code (within twenty miles of the Mount Laguna Observatory or the Palomar Observatory). The project is located within Zone B of the Light Pollution Code (at least twenty miles of the Mount Laguna Observatory or the Palomar Observatory) and would not adversely affect nighttime views or astronomical observations because the project would be required to conform to the Light Pollution Code (Section 51.201-51.209). This would include the utilization of 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 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 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 project would have a less than significant impact with no required mitigation for the reasons detailed above. Therefore, the project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

Conclusion

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

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

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

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

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

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

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

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

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

2(a) The GPU EIR concluded this impact to be significant and unavoidable. The project site is not underlain by land designated as an important farmland by the Department of Conservation State Farmland Mapping and Monitoring Program (FMMP). The site has been designated as “Urban Builtup Land” and per aerial imagery, has not been used for agricultural use since the 1950s. In addition, no prime soils or statewide significant soils pursuant to the County Guidelines for Determining Significance for Agricultural Resources are mapped on the project site.

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

2(b) The GPU EIR concluded this impact to be less than significant with mitigation. The project site is zoned Rural Residential (RR), not considered an agricultural zone. In addition, the closest land under an Agricultural Preserve or a Williamson Act Contract is located

approximately 4.85 miles northeast of the project site. According to the County Guidelines, most types of agriculture interface conflicts would usually be less than significant if the land uses are separated by 300 feet. Therefore, no land use conflicts would occur to a Williamson Act or Agricultural Preserve.

As previously discussed, the GPU EIR determined impacts from land use conflicts 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.

- 2(c) Forestry Resources were not specifically analyzed under the GPU EIR because Appendix G of the State CEQA Guidelines was amended to include significance criteria for forestry resources after the release of the Notice of Preparation for the GPU EIR.

The project site, including any offsite improvements, do not contain any forest lands as defined in Public Resources Code section 12220(g). Therefore, project implementation would not result in the loss or conversion of forest land to a non-forest use. The outer edge of the Cleveland National Forest is located approximately 6.0 miles to the east of the project site. Thus, due to distance, the project would have no impact on the Forest. In addition, the County of San Diego does not have any existing Timberland Production Zones.

As previously discussed, Forestry Resources were not specifically analyzed under the GPU EIR because Appendix G of State CEQA Guidelines was amended to include significance criteria for forestry resources after the release of the NOP for the GPU EIR. However, because the project would have a less than significant impact for the reasons detailed above, the project would not increase impacts identified within the GPU EIR.

- 2(d) Forestry Resources were not specifically analyzed under the GPU EIR because Appendix G of the State CEQA Guidelines was amended to include significance criteria for forestry resources after the release of the Notice of Preparation for the GPU EIR. However, as indicated in response 2(c), the project site, or any off-site improvements, are not located near any forest lands. Therefore, because the project would have a less than significant impact for the reasons detailed above, the project would not increase impacts identified within the GPU EIR.

- 2(e) The GPU EIR concluded this impact to be significant and unavoidable. No agricultural operations are currently taking place on the project site. In addition, no impacts would occur in association with interface conflicts due to project distance from Williamson Act Contracts, Agricultural Preserves, and active agricultural operations. Please refer to response 2(a) and 2(b) for a discussion of on- and off-site agricultural resources and interface conflicts.

As previously discussed, the GPU EIR determined impacts from direct and indirect conversion of agricultural resources to be significant and unavoidable. Forestry Resources were not specifically analyzed under the GPU EIR because Appendix G of State CEQA Guidelines was amended to include significance criteria for forestry resources after the release of the NOP for the GPU EIR. However, because the project would have a less than significant impact to Forestry Resources for the reasons detailed above, the project would not increase impacts identified within the GPU EIR. In addition, the project would be

consistent with the analysis within the GPU EIR for Agricultural Resources because it would not increase impacts to Agricultural Resources identified within the GPU EIR.

Conclusion

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

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

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

An Air Quality and Greenhouse Gas Analysis was prepared by County Air Quality and Greenhouse Gas Specialist, Alyssa Way, dated August 11, 2020. The below responses were based on the analysis provided within the prepared Air Quality and Greenhouse Gas Analysis.

Discussion

- 3(a) The GPU EIR concluded this impact to be less than significant. The RAQS and SIP are based on General Plans within the region and the development assumptions contained within them. The project is for the subdivision of a 17.16-acre parcel to 24 residential lots, and a remainder lot, and is consistent with the density allowed on the project site pursuant to the county General Plan and Zoning Ordinance. Therefore, the project was anticipated in RAQS and SIP and would not conflict or obstruct implementation of these plans.

As previously discussed, the GPU EIR determined impacts on air quality plans to be less than significant. As the 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. The project consists of the subdivision of a 17.16-acre parcel into 24 residential lots with one remainder lot. The project earthwork consists of the balanced grading (i.e., no soil import or export) over 16 acres of the project site and would include the cut/fill of 124,250 cubic yards of soil on-site. The project would also construct approximately three acres of impervious surface (e.g., roadways and driveways), including a 900-foot private road and reconstruction of adjacent properties' driveways on the west side of Lemon Crest Drive.

Grading and Construction

The project would generate short-term emissions of criteria air pollutants, ozone precursors [i.e. volatile organic compounds (VOCs) and oxides of nitrogen (NOx)] during construction activities from fuel combustion and exhaust associated with construction equipment and vehicle traffic (i.e., worker commute), and fugitive dust emissions from grading and earth movement activities. The Air Quality and Greenhouse Gas Analysis modeled the project's short-term construction-related emissions based on the project's location, land use type, and type of construction. Grading activities in the County are subject to the Grading Ordinance and the San Diego Air Pollution Control District (SDAPCD) Rule 55 requiring the implementation of dust control measures, as well as SDAPCD Rule 67.0.1 which limits the VOC content of architectural coatings. Because of this, the following specific activities were quantified in the CalEEMod model: watering the site three times daily, replacing ground cover in disturbed areas when they become inactive, limit vehicle speeds on unpaved surfaces to 15 miles per hour, remove track-out dirt on paved roads, and limit residential interior flat coatings. Pursuant to the Air Quality and Greenhouse Gas Analysis, project construction criteria air pollutant and precursor emissions would not exceed the CDAPCD SLTs for any criteria pollutants or precursors.

Operation

Long-term operational emissions of criteria air pollutants and ozone precursors would result from area sources (i.e., consumer products, architectural coatings, and landscape maintenance equipment use), energy consumption (i.e. electricity and natural gas consumption), and mobile sources (i.e. fuel combustion in vehicle use associated with the project). In the model performed for the project site using CalEEMod, operational emissions were estimated at full buildout of the project, which would occur as early as 2025. Emissions of criteria pollutants associated with building energy consumption are estimated within CalEEMod, which assumes projects are compliant with the 2016 Building Energy Efficiency Standards (Title 24, Part 6). Because the project would be required to comply

with the most recent version of these standards, CalEEMod was updated to reflect the efficiency improvements of the 2019 Title 24 standards. Pursuant to the Air Quality and Greenhouse Gas Analysis, project operational criteria air pollutant and precursor emissions would not exceed the SDAPCD SLTs for any criteria air pollutants or precursors.

As previously discussed, the GPU EIR determined significant and unavoidable impacts to air quality violations. However, the project would have a less than significant impact to air quality violations 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.

- 3(c) The GPU EIR concluded this impact to be significant and unavoidable. The project would contribute to particulate pollution (PM10), nitrogen oxide gases (NOx), and volatile organic compounds (VOCs) emissions from construction/grading activities; however, the incremental increase would not exceed established screening thresholds (see question 3(b) above).

As previously discussed, the GPU EIR determined significant and unavoidable impacts to non-attainment criteria pollutants. However, the project would have a less than significant impact to non-attainment criteria 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 identified within the GPU EIR.

- 3(d) The GPU EIR concluded this impact to be significant and unavoidable. The project would introduce additional residential homes which are considered new sensitive receptors; however, the project site is not located within a quarter mile of any identified point source of significant emissions. Similarly, the project does not propose uses or activities that would result in exposure of sensitive receptors to significant pollutant concentrations and would not place sensitive receptors near Carbon Monoxide hotspots.

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 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 identified within the GPU EIR.

- 3(e) The GPU EIR determined less than significant impacts from objectionable odors. The project could produce objectionable odors during construction and operation of the residential components; however, these substances, if present at all, would only be in trace amounts (less than 1 µg/m³). Therefore, the project would not create objectionable odors affecting a substantial number of people and 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. 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
4. Biological Resources – Would the Project:			
a) Have a substantial adverse effect, either directly or through habitat modifications, on any candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

Two documents were prepared for the project related to Biological Resources:

- A Biological Letter Report, dated March 30, 2014 and a Biological Survey Update, dated May 13, 2020, prepared by Cummings and Associates.
- Multiple species Conservation Program Statement, dated July 29, 2020, prepared by Ashley Smith and Kendalyn White of the County of San Diego.

The below responses were based on the analysis provided within the prepared Biological Letter Report, Biological Survey Update and Multiple Species Conservation Program Statement.

4(a) The GPU EIR concluded this impact to be significant and unavoidable. The site is comprised of the following vegetation communities: 12.79-acres of Disturbed Habitat (Tier IV), 3.17-acres of Urban/Developed Land, and 0.94-acre of Diegan Coastal Sage Scrub (Tier II). Pursuant to the Biological Letter Report and the Biological Survey Update, the site does not contain any special status plant species. In addition, the only sensitive wildlife species seen during the site surveys was a Turkey Vulture overflying the property with no nesting potential onsite. However, the project site does contain habitat that could support nesting migratory birds or raptors protected under the Migratory Bird Treaty Act of 1918 (MBTA) and the California Fish and Wildlife Code. The project would be required to implement MBTA Provisions, as specified below, to ensure no impacts would occur to nesting migratory birds or raptors. The GPU EIR identified this mitigation measure as Bio-1.6 and Bio-1.7.

Mitigation Measures

The following list includes the project’s mitigation measures and conditions of approval:

MBTA Provisions

- If grading, clearing, brushing, and/or construction activities occur during the breeding seasons for migratory birds and raptors (January 15 – August 31), survey(s) shall be conducted within 7 days prior to project implementation by a qualified biologist to determine whether breeding birds occur within the areas potentially impacted by noise (within 2,600 feet of project impact site).
- If it is determined at the completion of surveys that there are no nesting birds (includes nest building or other breeding/nesting behavior) within the potential impact area, project activities shall be allowed to proceed.
- If surveys determine the presence of active nests, then operation of the following equipment shall not occur within the specified distances from an active nest during the respective breeding season:
 - general construction within 500 feet of raptor nest and 300 feet for all other migratory birds
 - bulldozer within 400 feet
 - rock crusher equipment within 1,350 feet

- breaker within 500 feet
- pile driver within 2,600
- cast-in-drilled holes equipment within 350 feet.
- Construction in the specified distances above shall (1) be postponed until a qualified biologist determines the nest(s) is no longer active or until after the respective breeding season; or (2) not occur until a temporary noise barrier or berm is constructed at the edge of the development footprint and/or around the piece of equipment to ensure that noise levels are reduced to below 60 dBA or ambient noise levels. Decibel output may be confirmed by a County-approved noise specialist and intermittent monitoring would be required by a qualified biologist to ensure that conditions have not changed.
- If project activities are to resume in an area where they have not occurred for a period of seven or more days during the breeding season, an updated survey for avian nesting will be conducted.

In addition to above, the project site also contains 0.94-acre of Diegan Coastal Sage Scrub (Tier II). Because the project site is located outside of the Pre-Approved Mitigation Area (PAMA), but mitigation is proposed to be within an approved mitigation bank, the mitigation ratio for impacts to the Tier II habitat is 1:1 per the Biological Mitigation Ordinance (BMO). The applicant would be required to purchase 1.0 acre (rounded-up) of Tier II mitigation from the Crestridge Mitigation Bank. If no Tier II credits are available, then up-tiering to purchase Tier I credits or some other mitigation alternative acceptable to the County of San Diego, would be fulfilled. The GPU EIR identified this mitigation measure also as Bio-1.5 and Bio-1.6.

Mitigation Measures

The following list includes the project's mitigation measures and conditions of approval:

Purchase of Offsite Mitigation

- In order to mitigate for impacts to Diegan coastal sage scrub, which is a sensitive biological resource pursuant to the BMO, offsite mitigation shall be acquired prior to the approval of the map and prior to the approval of any plan and issuance of any permit.
- The applicant shall purchase habitat credit or provide for the conservation of habitat of 1.0 acres of Tier II (or Tier I) habitat, located at the Crestridge Conservation Bank, or other County approved mitigation bank, within a Biological Resource Core Area in the MSCP.

With the implementation of the above mitigation measures, the project would not result in a substantial adverse effect 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.

As previously discussed, the GPU EIR determined impacts to special status species as significant and unavoidable. However, the project would have a less than significant impact with mitigation for MBTA Provisions and the purchase of 1.0 acre of Diegan Coastal Sage Scrub Tier II habitat from an approved mitigation bank, identified in the GPU EIR as Bio-1.5 through Bio-1.7. Therefore, the project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 4(b) The GPU EIR concluded this impacts to be significant and unavoidable. Riparian habitat and other sensitive natural communities on the project site were evaluated in the Biological Letter Report and Biological Survey Update. As stated in response 4(a), the project site includes habitat for .94-acre of Diegan Coastal Sage Scrub and would mitigate for impacts through the purchase of 1.0 acre at the Crestridge Conservation Bank or other County approved mitigation bank. In addition, no riparian habitat has been identified on the project site. Therefore, the project would not 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.

As previously discussed, the GPU EIR determined impacts to riparian habitat and other sensitive natural communities as significant and unavoidable. However, the project would have a less than significant impact with mitigation for purchase of offsite Diegan Coastal Sage Scrub habitat identified in the GPU EIR as Bio 1.5 and Bio 1.6. 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(c) The GPU EIR concluded this impact to be less than significant with mitigation. As previously discussed in response 4(b), the project site does not contain any riparian habitat. In addition, the project site does not contain any wetland habitats or soils on-site, and there are no Ordinary Water Marks on the property. As such, the project would not have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act.

As previously discussed, the GPU EIR determined impacts to federally protected wetlands as 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.

- 4(d) The GPU EIR concluded this impact to be significant and unavoidable. The project site is surrounded by development including residential uses and an elementary school. However, pursuant to the Biological Letter Report and the Biological Survey Update, the project site is close to a nearby movement linkage for the California Gnatcatcher known as the "Lakeside Archipelago". This linkage was intended to allow movement of avian species to points north and south of Interstate-8 via high ground that acts as "stepping stones". Part of this "stepping stone" linkage is approximately 600-feet to the southeast of the subject property. Although the project site contains a small knob with a limited amount of Diegan Coastal Sage Scrub habitat, the project site is topographically lower than the "stepping stone" to the southeast and would effectively act as a dead end for habitat island hopping birds, such as the California Gnatcatcher. In addition, the project would also be required to comply with the BMTA as a condition of approval, as stated in response 4(a). Therefore, the project would not 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.

As previously discussed, the GPU EIR determined impacts to wildlife movement corridors as significant and unavoidable. However, the project would have a less than significant impact with mitigation by incorporating BMTA provisions identified by the GPU EIR as mitigation measures Bio-1.6 and Bio-1.7. Therefore, the project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 4(e) The GPU EIR concluded this impact to be less than significant. The project site is within the South County Multiple Species Program (MSCP), identified as the Metro-Lakeside-Jamul Segment. The project is consistent with the MSCP, Guidelines for Determining Significance for Biological Resources, and the BMO through the required offsite Diegan coastal sage scrub mitigation purchase of 1.0 acre through an approved mitigation bank. For additional information, please see the prepared MSCP-Conformance Statement dated July 29, 2020. The project would not conflict with the provisions of any adopted Habitat Conservation Plan, Natural Communities Conservation Plan, other approved local, regional or state habitat conservation plan or any other local policies or ordinances that protect biological resources.

As previously discussed, the GPU EIR determined impacts on local policies and ordinances as well as habitat conservation plans and natural community conservation plans as less than significant. As the 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 (Bio-1.5, Bio-1.6, and Bio-1.7) would be applied to the project. Those mitigation measures, detailed above, requires the project applicant to purchase mitigation credit for Diegan Coastal Sage Scrub and comply with the MBTA.

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

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

A historical resources report entitled, *Final Archaeological Letter Report for a Negative Archaeological Survey of the Stewart Parcel at 12361 Lemon Crest Drive (TM-5582) and PDS2014-ER-14-14-005, Lakeside, California*, was prepared for the project by Richard Carrico, September 10, 2017. The below responses were based on the analysis provided within the prepared Final Archaeological Letter Report.

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 by County approved archaeologist, Richard Carrico, it has been determined that there are no impacts to historical resources because they do not occur within the project site. The results of the survey are provided in the Final Archaeological Letter Report prepared by Richard Carrico.

As previously discussed, the GPU EIR determined impacts on historic resources 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.

5(b) The GPU EIR concluded this impact to be less than significant with mitigation. Pursuant to the Final Archaeological Letter Report, no archaeological resources were found on the property during the archaeological survey.

The Native American Heritage Commission (NAHC) was contacted for a listing of Native American Tribes whose ancestral lands may be impacted by the project (Sacred Lands check). The NAHC responded indicating that the project site was negative for resources. Tribal outreach was conducted with the listed tribes and organizations (Barona, Ewiaapaayp, Sycuan, Viejas, Inter-Tribal Cultural Resource Protection Council, Kumeyaay

Cultural historic Committee, Kumeyaay Cultural Repatriation Committee, and Kumeyaay Diegueno Land Conservancy). No response was received except from Viejas. Several attempts were made to meet with Viejas; however, no response was received, and consultation concluded. No information was received related to the presence of tribal cultural resources. Based on the results of the survey and consultation, it has been determined that tribal cultural resources are not present onsite.

As considered by the GPU EIR, regional coordination with the NAHC and local tribal governments was conducted. The GPU EIR identified this mitigation measure as CUL-2.4 and CUL-2.6.

Frank Salazar (Campo) was a part of the survey crew engaged to provide Native American monitoring for the survey. No concerns were raised by Mr. Salazar during the archaeological survey of the property.

The GPU EIR identifies that undiscovered subsurface archaeological resources should be protected by requiring grading monitoring by a qualified archaeologist and Native American monitor for ground disturbing activities in the vicinity of known archaeological resources. The GPU EIR identified this mitigation measure as CUL-2.5. However, the study was negative for resources and no information was provided as a result of tribal outreach. Therefore, an archaeological monitoring program is not required. Should resources be encountered, the project is subject to the County's Grading Ordinance and the County's Cultural Resource Guidelines that would require that a professional archaeologist and Native American monitor be engaged to evaluate the find.

As previously discussed, the GPU EIR determined impacts to archaeological resources as less than significant with mitigation. As the project would have a less than significant impact to historic resources 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(c) The GPU EIR concluded this impact to be less than significant. The site does not contain any unique geologic features that have been listed in the County's Guidelines for Determining Significance for Unique Geology Resources, nor does the site support any known geologic characteristics that have the potential to support unique geologic features.

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

- 5(d) The GPU EIR concluded this impact to be less than significant with mitigation. A review of the County's Paleontological Resources Maps and data on San Diego County's geologic formations indicates that the project is located on Cretaceous Plutonic formations that has no potential to contain unique paleontological resources.

As considered by the GPU EIR, potential impacts to paleontological resources will be mitigated through ordinance compliance and through implementation of the following mitigation measures: conformance with the County's Guidelines for Determining

Significance for Paleontological Resource and the Grading Ordinance if resources are encountered. The GPU EIR identified these mitigation measures as Cul-3.1 and Cul-3.2.

As previously discussed, the GPU EIR determined impacts on paleontological resources as less than significant with mitigation. As the project would have a less than significant impact with conformance to the County's Guidelines for Determining Significance for Paleontological Resources and Grading Resources identified by the GPU EIR as mitigation measures Cul-3.1 and Cul-3.2, the project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 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 site does not include a formal cemetery or any archaeological resources that might contain interred human remains. 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 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-3.1 and Cul-3.2) would be applied to the project. This mitigation measure, detailed above, requires conformance with the County's Guidelines for Determining Significance for Paleontological Resources and the County Grading Ordinance, if resources are encountered.

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

- | | | | |
|---|--------------------------|--------------------------|--------------------------|
| a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

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 Greenhouse Gases (GHG), while protecting public health and contributing to a more sustainable environment. 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 GHG. 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 increase the demand for electricity and natural gas at the project site, and gasoline consumption in the project area during construction and operation relative to existing conditions. CEQA requires mitigation measures to reduce “wasteful, inefficient and unnecessary” energy usages (Public Resources Code Section 21100, subdivision [b][3]). Neither the law nor the State CEQA Guidelines establish criteria that define wasteful, inefficient, or unnecessary use. Compliance with the California Code of Regulations 2019 Title 24 Part 6 Building Code and 2019 Energy Efficiency Standards would result in highly energy-efficient buildings. However, compliance with building codes does not adequately address all potential energy impacts during construction and operation. It can be expected that energy consumption, outside of the building code regulations, would occur through the transport of construction materials to and from the site during the construction phase and the use of personal vehicles by residents.

Grading and Construction

The grading required for the project would be 124,250 cubic yards of material and would be balanced onsite. During the grading and construction phases of the project, the primary energy source utilized would be petroleum from construction equipment and vehicle trips. To a lesser extent, electricity would also be consumed for the temporary electric power for as-necessary lighting and electronic equipment. Activities including electricity would be temporary and negligible; therefore, electricity use during grading and construction would

not result in wasteful, inefficient, or unnecessary consumption of energy. Any natural gas that may be consumed as a result of the project construction would be temporary and negligible and would not have an adverse effect; therefore, natural gas used during grading and construction would also not result in wasteful, inefficient, or unnecessary consumption of energy.

The energy needs for the project construction would be temporary and is not anticipated to require additional capacity or increase peak or base period demands for electricity or other forms of energy. Construction equipment use and associated energy consumptions would be typical of that associated with the construction of residential projects of this size in a rural-rural setting. Additionally, the project is consistent with the density established by the General Plan and Zoning Ordinance. Thus, the project's energy consumption during the grading and construction phase would not be considered wasteful, inefficient, or unnecessary.

Operational

Operation of the project would be typical of residential land uses requiring natural gas for space and water heating, and landscape maintenance activities. The project would meet the California Code of Regulations Title 24 Standards and Energy Efficiency Standards for energy efficiency that are in effect at the time of construction. The project would also comply with the County's Landscape Ordinance and the water use application using prescriptive compliance option to reduce overall water use onsite. In addition, the project would result in 226.56 ADT, is consistent with the County General Plan and Zoning Ordinance, and would not result in wasteful, inefficient or unnecessary petroleum usage throughout project operations.

Over the lifetime of the project, fuel efficiency of vehicles is expected to increase as older vehicles are replaced with newer, more efficient models. As such, the amount of petroleum consumed as a result of vehicle trips to and from the project site during operation would decrease over time. State and Federal regulations regarding standards for vehicles (e.g. Advanced Clean Cars Program, CAFÉ Standards) are designed to reduce wasteful, unnecessary, and inefficient use of fuel. The coupling of various State policies and regulations such as the Zero-Emission Vehicles Mandate and Senate Bill 350 would result in the deployment of electric vehicles which would be powered by an increasingly renewable electrical grid.

The project would use electricity for street lighting, household appliances as well as indoor and outdoor household lighting. In addition, the proposed residential use would result in natural gas use for building heating, water heating, and appliances. As previously stated, the project would be designed according to the latest version of Title 24 and Energy Efficiency Standards, which would continue to improve building efficiency and result in less natural gas consumption over time. The project would not result in natural gas consumption atypical of residential uses and would be consistent with the anticipated natural gas consumption under General Plan building of the site; therefore, the project would not be expected to result in wasteful, inefficient or unnecessary natural gas energy usage throughout project operations.

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.

6b. 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 project includes the following energy conservation measures:

- Compliance with County's Water Conservation in Landscaping Ordinance, demonstrating a 40% reduction in outdoor use which would reduce energy required for water conveyance.
- Install low flow indoor water fixtures in all residential units, reducing water consumption in associated energy required for water conveyance.
- Work with the regional or local water agency to determine if incentives/rebates are available for the purchase and installation of rain barrels.
- Install at least one qualified energy efficient appliance in all residential units.
- Install a solar thermal water heater, tankless gas or electric water heater, electric heat pump water heater, storage electric water heater, or other alternatively fueled water heating system in all residential units.

The project would be consistent with several energy reduction policies of the County General Plan including policies COS-14.1, COS-14.3 and COS-16.3. Additionally, the project would be consistent with sustainable development and energy reduction policies such as policies COS-14.3 and COS-15.4, through compliance with the most recent Title 24 standards and Energy Efficiency Standards at the time of project construction. Therefore, the project would implement energy reduction design features and comply with the most recent energy building standards consistent with applicable plans and policies. Therefore, the project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

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

Conclusion

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

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

7. Geology and Soils – Would the Project:

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

Discussion

7(a)(i) The GPU EIR concluded this impact to be less than significant. The site is located in the tectonically active southern California area and will therefore likely experience shaking effects from earthquakes. The type and severity of the seismic hazards affecting a site are to a large degree dependent upon the distance to the causative fault, the intensity of the seismic event, and the underlying soil characteristics.

Pursuant to the County Geographic Information System (GIS), the project is not located in a fault rupture hazard zone, identified by the Alquist-Priolo Earthquake Fault Zoning Act, Special Publication 42, Revised 1997, Fault-Rupture Hazards Zones in California. No faults

have been mapped within the project site and the nearest known active fault to the site is approximately 3.2 miles southwest of the project site. However, the identified fault is a “Pre-Quaternary” fault, or a fault with movement older than 1.6 million years. Accordingly, the project is not expected to be impacted by fault surface rupture on the subject site. For a response related to ground shaking, please refer to 7(a)(ii) below.

7(a)(ii) The GPU EIR concluded this impact to be less than significant. To ensure the structural integrity of all buildings and structures, the project must conform to the Seismic Requirements as outlined within the California Building Code. In addition, a geotechnical report with proposed foundation recommendation would be required to be approved before the issuance of a building permit as further discussed in response 7(a)(iii). 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 project site is not located within a “Potential Liquefaction Area” as identified in the County Guidelines for Determining Significance for Geologic Hazards. In addition, the potential for liquefaction at the site would be less than significant due to the site characteristics of the underlying hard granitic rock. In addition, to ensure no impacts would occur, a geotechnical report would be required prior to ground disturbance activities as a standard condition of approval. The GPU EIR identified the standard condition of a geotechnical report within section 2.6.3.1, Federal, State and Local Regulations and Existing Regulatory Processes, Liquefaction.

Conditions of Approval

The following list includes the project conditions of approval:

Geotechnical Report

- A California Certified Engineering Geologist shall complete a final soils report specific to the preliminary design of the proposed development and submit the final soils report to PDS. The findings shall be reviewed and approved by the Director of the County Department of Planning and Development Services or designee.

7(a)(iv) The GPU EIR concluded this impact to be less than significant. The site is located within a “Landslide Susceptibility Area” as identified in the County Guidelines for Determining Significance for Geologic Hazards. However, a geotechnical report would be required prior to ground disturbance activities as a standard condition of approval. The GPU EIR identified the standard condition of a geotechnical report within section 2.6.3.1, Federal, State and Local Regulations and Existing Regulatory Processes, Liquefaction.

As previously discussed, the GPU EIR determined less than significant impacts from exposure to seismic-related hazards and soil stability. This determination was based on required consistency with all applicable federal, state and local standards and regulations. The project would have a less than significant impact with the incorporation of project conditions for a geological soils report, as a standard condition of approval. The GPU EIR identified the standard condition of a geotechnical report within section 2.6.3.1, Federal, State and Local Regulations and Existing Regulatory Processes, Liquefaction. 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. According to the Soil Survey of San Diego County, the soils on-site are identified as inceptisols [Vista coarse sandy loam, 15 to 30 percent slopes (VsE)], that have a soil erodibility rating of moderate. However, the project would not result in substantial soil erosion or the loss of topsoil because the project would be required to comply with the Watershed Protection Ordinance (WPO) and Grading Ordinance which would ensure that the project would not result in any unprotected erodible soils, would not significantly alter existing drainage patterns, and would not develop steep slopes. Additionally, the project would be required to implement Best Management Practices (BMPs) per the Priority Development Project Storm Water Quality Management Plan to prevent fugitive sediment. Please see section ten (10) Hydrology and Water Quality for a detailed discussion.

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

- 7(c) The GPU EIR concluded this impact to be less than significant. Landslide Susceptibility Areas was discussed in response (a)(iv). As indicated in response (a)(iv), although the site is located within a "Landslide Susceptibility Area" as identified in the County Guidelines for Determining Significance for Geologic Hazards, the potential for landslides to impact the proposed development is considered to be low.

Lateral spreading is a principal effect from liquefaction which was discussed in response 7(a)(iii). As discussed in response 7(a)(iii), the project site is not located within a "Potential Liquefaction Area" as identified in the County Guidelines for Determining Significance for Geologic Hazards. In addition, a Geotechnical Report would be prepared for the project site which would analyze the site for potential lateral spreading and recommend site design measures, if applicable. Therefore, impacts

Subsidence and collapse may be caused by unstable geological structures or conditions. As stated in response 7(a), impacts to the project site from rupture of a known earthquake fault and strong seismic ground shaking or seismic-related ground failure would be unlikely to occur due to the hard underlying granite rock as well as the required Geotechnical Report.

As previously discussed, the GPU EIR determined impacts from soil stability to be less than significant. As the project would have a less than significant impact with the incorporation of the standard project condition for a Geotechnical Report, 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 concluded this impact to be less than significant. Pursuant to the County GIS, the project site is not underlain by expansive soils. In addition, a Geotechnical Report would be required as a standard condition of approval to implement standard engineering techniques consistent with the California Building Code standards and requirements.

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

- 7(e) The GPU EIR concluded this impact to be less than significant. The project does not propose the use of septic systems or other alternative wastewater disposal system. The project site would be connected to sewer, served by the San Diego County Sanitation District Lakeside Service Area.

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

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 by adhering to the project conditions of approval, which are consistent with the GPU EIR.

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

An Air Quality and Greenhouse Gas Analysis was prepared by County Air Quality and Greenhouse Gas Specialist, Alyssa Way, dated August 11, 2020. The below responses were based on the analysis provided within the prepared Air Quality and Greenhouse Gas Analysis.

Analysis

- 8(a) The GPU EIR concluded this impact to be less than significant with mitigation. The project would subdivide the 17.16-acre lot into 24 single-family residential lots with one remainder lot. The project is consistent with the development density established by the General plan, VR-2, allowing for 2 single-family residences per gross acre. The project would produce GHG emissions through construction activities, operational vehicle trips, as well as indirect emissions from water consumption, waste generation and residential energy consumption.

However, the project falls below the screening criteria that were developed to identify project types and sizes that would have less than cumulatively considerable GHG emissions (i.e., the project would result in less than 50 single-family units).

The California Air Pollution Control Officers Association (CAPCOA) prepared a white paper which recommends a 900 metric tons (MT) of carbon dioxide equivalent (CO₂e) per year screening level to determine the size of projects that would be likely to have a less than considerable contribution to the cumulative impact of climate change. The CAPCOA threshold of 900 MTCO₂e represents a more stringent screening level than has been approved by other air districts in compliance with 2030 statewide reduction targets. Due to the aggressive GHG capture rate, the CAPCOA threshold would still act as a viable threshold to reduce project GHG emissions proposed after 2020 and meet SB 32 targets. The screening thresholds are recommended based on various land use densities and project types.

A quantitative threshold was developed to ensure capture of 90 percent or more of likely future discretionary developments. The objective was to set the emissions threshold low enough to capture a substantial fraction of future residential development while setting the emission threshold high enough to exclude small development projects that would contribute a relatively small fraction of cumulative statewide GHG emissions. A unit threshold was developed which would capture approximately 90 percent of residential units. GHG emissions associated with 50 single-family residential units were estimated and found to be 900MT CO₂e, establishing the basis for demonstrating that cumulative reductions are being achieved across the state for residential development.

Projects that meet or fall below this screening threshold are expected to result in 900 MT/year of GHG emissions or less and would not require additional analysis. The 50-unit standard for single-family residential land use would apply to the project.

The project would develop 24 single-family residential lots, with one remainder lot, and would therefore fall below screening criteria. For projects of this size, it is presumed that the construction and operational GHG emissions would not exceed 900 MTCO₂e per year, and therefore would be a less-than cumulatively considerable impact. However, the Air Quality and Greenhouse Gas Analysis estimated the GHG emissions from the project using CalEEMod Version 2016.3.2. The project is estimated to generate 342 MTCO₂e per year during operations. When combined with a 30-year amortization of construction emissions of 11 MTCO₂e per year (consistent with the methodology from the South Coast Air Quality Management District), total annual project GHG emissions were estimated to be 353 MTCO₂e. Thus, the project would not generate GHG emissions in excess of the CAPCOA threshold.

In addition, the project has incorporated the following design features to reduce the impacts associated to GHG and will be conditioned to meet the standards in effect at the time of construction:

Project Design Features:

- Install either solar thermal, tankless electric, storage electric, electric heat pumps, or tankless gas water heaters
- Install water efficient kitchen faucets with a maximum flow rate of 1.5 gallons per minute at 60 psi. Temporary increases in kitchen faucets would not exceed 2.2 gallons per minute at 60 psi. In addition, the project would install at least one qualified ENERGY STAR dishwasher or clothes washer per residential unit.
- Install one rain barrel per every 500 square feet of available roof space unless State, regional, or local incentives/rebates are not available; or if funding the programs/rebates have been exhausted.
- Comply with the County's Water Conservation in Landscape Ordinance by submitting a landscape documentation package which is required to demonstrate a 40 percent reduction in outdoor water use.
- Plant at least two trees per residential dwelling unit.

Project design features are consistent with County General Plan mitigation measures CC-1.1, CC-1.5, CC-1.10 and CC-1.11, which encourage incentives for energy efficient development, coordination with the San Diego County Water Authority and other water agencies, and implementation of the Ordinance Relating to Water Conservation for Landscaping.

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. As such, the project would be consistent with County goals and policies included in the County General Plan that address greenhouse gas reductions. Therefore, the project would be consistent with emissions reduction targets of Assembly Bill 32 and the Global Warming Solutions Act.

The project would be required to comply with the Building Energy Efficiency Standards for low-rise residential buildings as outlined by the California Energy Commission. These requirements outline standards for energy efficiency related to lighting, water heating, HVAC, and photovoltaic systems. The project would be consistent with General Plan policy COS-15.1 which requires that new buildings be designed and constructed in accordance with "green building" programs that incorporate techniques and materials that maximize energy efficiency and reduce emissions of GHGs and toxic air contaminants. Further discussion regarding energy efficiency is discussed above in section 3. Air Quality and 6. Energy Use. The project would not conflict with any applicable plan, policy or regulation adopted for the purpose of reducing emissions of greenhouse gas emissions.

As previously discussed, the GPU EIR determined impacts to applicable regulation compliance to be less than significant. As the project would have a less-than-significant impact for the reasons detailed above, the project would be consistent with the analysis

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

Conclusion

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

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

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

Would the Project:

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

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

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

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

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

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?

A Fire Protection Plan was prepared by J. Charles Weber of J. Charles Weber Fire and Life Safety Consultant, dated August 2, 2016. The response for 9(g) is based on the analysis provided within the prepared Fire Protection Plan.

Discussion

9(a) The GPU EIR concluded this impact to be less than significant. The project would not create a significant hazard to the public or the environment because it does not propose the storage, use, transport, emission, or disposal of hazardous substances, nor are Hazardous Substances proposed or currently in use in the immediate vicinity.

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. 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(b) The GPU EIR determined impacts from hazards to schools to be less than significant. The project is located within one-quarter mile of an existing or proposed school: Lemon Crest Elementary (adjacent parcel to the east) and Riverview Elementary (0.45-mile west). However, as discussed in response 9(a), the project would not store, transport, emit or dispose hazardous substances. The project is for the development of residential homes. Therefore, the project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of a school.

As previously discussed, the GPU EIR determined impacts from hazards to schools to be less than significant. Because 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(c) The GPU EIR concluded this impact to be less than significant. The site is not 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. Therefore, the project would not result in a release of hazardous substances and would not create a significant hazard to the public or the environment.

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

- 9(d) The GPU EIR concluded this impact to be less than significant with mitigation. The project is not located within an Airport Safety Zone, Avigation Easement, Overflight area, or within two miles of a public airport. However, the project is located approximately 2.65-miles east of the Gillespie Airport and is located within a Federal Aviation Administration (FAA) Height Notification Surface Area. The project is consistent with the County Zoning Ordinance, allowing a maximum height of 35-feet. Because the project would not reach a significant height in elevation (i.e. 200 feet), the project would not result in a safety hazard for people residing or working in the project area. In addition, the project applicant is required to notice the FAA prior to construction pursuant to Federal Regulation Title 14 Part 77 which establishes standards and notification requirements.

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

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

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

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

- 9(f)(ii) SAN DIEGO COUNTY NUCLEAR POWER STATION EMERGENCY RESPONSE PLAN:
The project 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 require the annexation into the San Diego County Sanitation District Lakeside Service Area with an approximate 900-foot long public sewer extension. However,

the project has obtained a Project Facility Availability form for both sewer and water signed from the San Diego County Sanitation District indicating the District's ability to serve the project. In addition, the project is consistent with density established under the County General Plan. Therefore, the project would not alter major water or energy supply infrastructure which could interfere with the plan.

9f)(v) DAM EVACUATION PLAN:

The project site is not located within an identified 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.

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 located on a 17.16-acre site in Lakeside in moderate, high and very high fire hazard severity zones. However, the project would not expose people or structures to a significant risk of loss, injury or death involving wildland fires because the project would comply with the regulations relating to emergency access, fuel modification, and water supply, specified in the Consolidated Fire Code, as described in the Fire Protection Plan prepared for the project. In addition, a Fire Service Availability Letter was submitted for the project indicating the project would meet the required travel response times for the County of San Diego General Plan Safety Element. The closest fire station is Fire Station #1 located approximately 1-mile northwest at 9726 Riverview Avenue. The estimated travel time is 2.35 minutes, which meets the required travel response time of 5 minutes.

As previously discussed, the GPU EIR determined impacts from wildland fires 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.

- 9(h) The GPU EIR concluded this impact as less than significant. The project does not involve or support uses that would allow water to stand for a period of 72 hours or more (e.g. artificial lakes, agricultural ponds). Also, the project does not involve or support uses that would produce or collect animal waste, such as equestrian facilities, agricultural operations (chicken coops, dairies etc.), solid waste facility or other similar uses. There are none of these uses on adjacent properties. Therefore, the project would not substantially increase current or future resident's exposure to vectors, including mosquitoes, rats or flies.

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

Conclusion

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

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

Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
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10. Hydrology and Water Quality – Would the Project:

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

- f) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course 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?

Two technical studies were prepared for the project related to hydrology and water quality:

- A Priority Development Project (PDP) Storm Water Quality Management Plan (SWQMP) dated May 16, 2019, prepared by S. Pat Rymer, P.E., Civil Engineer
- A Hydraulic Study February 12, 2019 and prepared by S. Pat Rymer, P.E., Civil Engineer

The below responses were based on the analysis provided within the prepared PDP SWQMP and Hydraulic Study.

Discussion

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.

During the construction phase, the project would prepare and implement a Storm Water Pollution Prevention Plan (SWPPP). The SWPPP would implement the following typical

erosion control BMPs: hydraulic stabilization and hydroseeding on disturbed slopes; County Standard lot perimeter protection detail and County Standard desilting basin for erosion control on disturbed flat areas; energy dissipater outlet protection for water velocity control; silt fencing, fiber rolls, gravel and sand bags, storm drain inlet protection and engineered desilting basin for sediment control; stabilized construction entrance, street sweeping and vacuuming 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 (CGP) adopted by the State Water Resources Control Board (SWRCB) on September 2, 2009. During the post-construction phase, as outlined in the SWQMP, the project would implement site design, source control and structural BMPs to prevent potential pollutants from entering storm water runoff. The SWQMP has been 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.

Conditions of Approval

The following list includes the project conditions of approval:

Storm Water Pollution Prevention Plan

- A SWPPP would be prepared in accordance with the National Pollutant Discharge Elimination Systems Construction General Permit adopted by the State Water Resources Control Board.

The project's conformance to the waste discharge requirements of both the CGP 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 project would have a less than significant impact to water quality standards with the implementation of project conditions as detailed above. The conditions are consistent with the GPU EIR mitigation measures Hyd-1.2, Hyd-1.3, and 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(b) The GPU EIR concluded this impact to be significant and unavoidable. The project lies in the Santee and Coches hydrologic subareas, of the lower San Diego area, within the San Diego hydrologic unit. According to the Clean Water Act Section 303(d) list, a portion of this watershed is impaired. Constituents of concern in the lower San Diego watershed include benthic community effects, cadmium, nitrogen, phosphorus, total dissolved solids, and toxicity. The project could contribute to release of these pollutants; however, the project would comply with the WPO (identified as GPU EIR mitigation measure Hyd-1.2) and implement site design measures, source control BMPs, and treatment 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 with mitigation (Hyd-1.2, Hyd-1.3 and Hyd-1.5) to water quality standards and requirements. 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 responses 9(a) and 9(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 project would have a less-than significant impact with mitigation to water quality standards and requirements and groundwater supplies and recharge (Hyd-1.2, Hyd-1.3, and 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 would obtain its water supply from the San Diego County Sanitation District Lakeside Service Area. The District obtains water from surface reservoirs or other imported sources. The project would not use any groundwater and would not involve operations that would interfere substantially with groundwater recharge.

As previously discussed, the GPU EIR determined significant and unavoidable impacts to water quality standards and requirements and groundwater supplies and recharge. 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.

- 10(e) The GPU EIR concluded this impact to be less than significant with mitigation. The site exhibits varying topography, ranging from a relatively gentle up-hill slope located on the northwest, to a moderately steep slope located on the northeast and eastern portions of the project site. Elevations of the steep portion of the site are 440 feet ASL at the base and 514 feet ASL at the peak/top of the slope. The peak of the combined hillsides produces a relatively smoothly curved and domed plateau, which extends for the length of the project site in a south to north configuration.

The project site has 8 preconstruction drainage areas that discharge at 8 different points on the property. Of these discharge points, 2 areas do not discharge to an existing hardened conveyance system, but currently discharge as surface flows onto adjacent properties which eventually flow into hardened conveyance systems within public streets. To correct the flows onto the adjacent properties, as well as upgrade the existing flows, modifications would be made to the existing on-site drainage patterns. Pursuant to the calculations provided within the Hydraulic Study, all project site drainage would be captured onsite and would not impact any downstream facilities.

Although the project site would be modified to correct and upgrade existing onsite drainage, the project would not result in substantial erosion or siltation on or off-site because storm

water management plans are prepared for both the construction and post-construction phases of the development project as described in response 10(a). During the construction phase, the project would prepare and implement a SWPPP. 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, the project would be required to comply with the PDP SWQMP, requiring implementation of site design, source control and structural BMPs. The SWQMP has been 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. In addition, the project would be required to comply with the County Grading ordinance, the County RPO, and be developed away from ridgelines, conform to the natural topography, not significantly alter dominant physical characteristics of the site, as well as maximize natural drainage and topography when conveying stormwater. These aforementioned measures were identified as Hyd-3.1, Hyd-3.2 and Hyd-3.3 by the GPU EIR. Therefore, it has been determined that the project would not result in significantly increased erosion or sedimentation potential and would not alter any drainage patterns of the site or area on- or off-site.

As previously discussed, the GPU EIR determined significant and unavoidable impacts to erosion or siltation. However, the project would have a less than significant impact to erosion or siltation with mitigation (Hyd-1.2, Hyd-1.3, Hyd-1.5, Hyd-3.1, Hyd-3.2 and Hyd-3.3). 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 Hydraulic Study determined that the project would not alter the existing drainage pattern in a manner which would result in flooding on- or off-site. To ensure that any runoff generated from the site would not alter the rates downstream, the project Hydraulic calculations were provided. Pursuant to these calculations, all surface flows onsite would be attenuated with tree wells and expanded basins. Therefore, the project design would not substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site.

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

- 10(g) The GPU EIR concluded this impact to be less than significant with mitigation. Pursuant to the Hydraulic Study prepared for the project, the project would not exceed the capacity of existing or planner storm water drainage systems. The project would upgrade the existing drainage system with tree wells and expanded basins. Therefore, the project design would not result in exceeding the capacity of storm water drainage systems.

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

- 10(h) The GPU EIR concluded this impact to be significant and unavoidable. The project has the potential to generate pollutants; however, site design measures, source control BMPs, and treatment control BMPs as indicated in response 10(a) would be employed such that potential pollutants would be reduced to the maximum extent practicable.

As previously discussed, the GPU EIR determine impacts to water quality standards and requirements as significant and unavoidable. However, the project would have a less than significant impact to water quality standards with the implementation of GPU EIR mitigation measures Hyd-1.2, Hyd-1.3 and Hyd-1.5. Therefore, the project would not be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 10(i) The GPU EIR concluded this impact to be less than significant with mitigation. According to the Hydraulic Study, the project would not be placed within a 100-year flood hazard area. In addition, the project site is not located within a floodplain or floodway.

As previously discussed, the GPU EIR determined impacts to place housing within a 100-year flood hazard area as less than significant with mitigation. 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.

- 10(j) The GPU EIR concluded this impact to be less than significant with mitigation. No 100-year flood hazard areas were identified on the project site or offsite improvement locations. Therefore, the project would not place housing or structures within a 100-year flood hazard area that would impede or redirect flood flows.

As previously discussed, the GPU EIR determined impacts from impeding or redirecting flood flows as less than significant with mitigation. The 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.

- 10(k) The GPU EIR concluded this impact to be less than significant with mitigation. As discussed in response 10(i) and 10(j), the project site is not located within a 100-year flood hazard area, floodway or floodplain. Therefore, the project would not expose people or structures to a significant risk of loss, injury or death involving flooding.

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 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 is not located within a dam inundation area. In addition, 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. The project would not interfere with the adopted Dam Evacuation Plan. Therefore, impacts would be less than significant.

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 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) The GPU EIR concluded this impact to be less than significant with mitigation.

10(m)(i) 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 response to question 7(a)(iv). In addition, the project would be required to comply with the County Grading ordinance, the County RPO, and be developed away from ridgelines, conform to the natural topography, not significantly alter dominant physical characteristics of the site, as well as maximize natural drainage and topography when conveying stormwater. These aforementioned measures were identified as Hyd-3.1, Hyd-3.2 and Hyd-3.3 by the GPU EIR.

As previously discussed, the GPU EIR determined impacts from seiche, tsunami and mudflow hazards to be less than significant with mitigation. However, the project would have a less than significant impact with project condition for a geological soils report identified by the GPU EIR in section 2.6.3.1, Federal, State and Local Regulations, and Existing Regulatory Processes, Liquefaction as well as mitigation identified in the GPU EIR as Hyd-3.1, Hyd-3.2, Hyd-3.3. 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 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 conditions identified in the GPU EIR and mitigation measures contained within the GPU EIR (Hyd-1.2, Hyd-1.3, Hyd-1.5, Hyd-3.1, Hyd-3.2, and Hyd-3.3) would be applied to the project. These mitigation measures, as detailed above, requires the project to conform with the WPO, the RPO, the Grading Ordinance, the Guidelines for Determining Significance for Surface Water Quality, Hydrology, and Groundwater Resources, implement LID standards, prepare a geological soils report, be developed away from ridgelines, conform to the natural topography, not significantly alter dominant physical characteristics of the site, as well as maximize natural drainage and topography when conveying stormwater.

Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
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11. Land Use and Planning – Would the Project:

a) Physically divide an established community?

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

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

11(a) The GPU EIR concluded this impact to be less than significant with mitigation. Although the project would include approximately 900 feet of water and wastewater pipeline extensions to the project site, the project would not physically divide an established community. The project site is surrounded by development including residential uses and an elementary school. The density proposed at the site is similar to the surrounding residential density and is consistent with the County General Plan.

As previously discussed, the GPU EIR determined impacts from physically dividing an established community as less than significant with mitigation. 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.

11(b) The GPU EIR concluded this impact to be less than significant. The project site is zoned RR, with a minimum lot size of 0.5-acre, and has a General Plan designator of VR-2, allowing for 2 single-family residences per gross acre. The project would subdivide a 17.16-acre site into 24 lots, with 1 remainder lot. The project is consistent with the County Zoning Ordinance as well as the development density established by the General Plan and certified by the GPU EIR. In addition, the project is consistent with the Lakeside Community Plan policies and goals such as the Land Use Residential Goal “provide for gradual residential growth, while retaining the rural atmosphere of Lakeside”, Land Use Policy and Recommendation 5 “Provide for street tree planting and landscaping, as well as the preservation of indigenous plant life”, and Land Use Policy and Recommendation 3 “confine higher density residential development to the areas that a) have all necessary public facilities, b) are within the existing sewer districts, and c) are adjacent to major roads and commercial areas.” Compared to other more rural portions of the Lakeside Community Plan area, such as eastern Lakeside, the project would be considered “higher density” at 2 dwelling units per acre. Consistent with the community plan, the project site is located in the western portion of the Lakeside Community Plan area, in the Village Boundary, near the cities of Santee and El Cajon that allows for greater density. The project is also located within the existing sewer district service boundary and is adjacent to major County-designated roads (i.e., Lemon Crest Drive, Wintergardens Blvd., and Los Coches Road). In addition, the project would be conditioned to submit landscape plans prior to any development, which integrate a minimum of two trees per residence (minimum of 48 trees). Therefore, the project would not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project.

As previously discussed, the GPU EIR determined impacts to conflicts with land use plans, policies, and 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. Therefore, the project would not result in an impact which was not adequately evaluated by the GPU EIR.

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

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

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

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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12(a) The GPU EIR determined that impacts to mineral resources would be significant and unavoidable. The California Surface Mining and Reclamation Act (SMARA) required classification of land into Mineral Resource Zones (MRZs). The project site has been classified by the California Department of Conservation – Division of Mines and Geology (Update of Mineral Land Classification: Aggregate Materials in the Western San Diego Production-Consumption Region, 1997) as an area of “Potential Mineral Resource Significance” (MRZ-3). However, the project site is surrounded by residential land uses which are incompatible to future extraction of mineral resources on the project site. A future mining operation at the project site would likely create a significant impact to neighboring properties for issues such as noise, air quality, traffic, and possibly other impacts. Therefore, 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 has already been lost due to incompatible land uses.

As previously discussed, the GPU EIR determined impacts to mineral resources to be significant and unavoidable. 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.

12(b) The GPU EIR concluded this impact to be significant and unavoidable. The project site is not located in an Extractive Use Zone (S-82), nor does it have an Impact Sensitive Land Use Designation (24) with an Extractive Land Use Overlay (25). The project site is not located in an area that has MRZ-2 designated lands, nor is it located within 1,300 feet of such lands. Therefore, no potentially significant loss of availability of a known mineral resource would occur as a result of the project.

As previously discussed, the GPU EIR determined impacts to mineral resources to be significant and unavoidable. 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 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. Therefore, the Project would not result in an impact which was not adequately evaluated by the GPU EIR.

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

Discussion

13(a) The GPU EIR concluded this impact to be less than significant with mitigation. The area surrounding the project site consists of residences, agricultural uses, and vacant land. The project will not expose people to potentially significant noise levels that exceed the

allowable limits of the General Plan, Noise Ordinance, or other applicable standards for the following reasons:

General Plan – Noise Element

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

Noise Ordinance – Section 36.404

The project would comply with the Noise Ordinance Section 36-404 for non-transportation noise generated by the project. The project site is zoned RR that has a one-hour average sound limit of 50 dBA daytime and 45 dBA nighttime. The adjacent properties are zoned RR and single-family residential. The project does not involve any noise producing equipment that would exceed applicable noise levels at the adjoining property line.

Noise Ordinance – Section 36-410

The project would comply with the Noise Ordinance Section 36-410 for construction noise. The project would not generate construction noise in excess of Noise Ordinance standards with the implementation of standard conditions. Construction operations will occur only during permitted hours of operation. Also, it is not anticipated that the project will operate construction equipment in excess of an average sound level of 75dB between the hours of 7 AM and 7 PM. These measures were identified by the GPU EIR as Noi-4.2.

Project Conditions of Approval

The following list includes project’s conditions of approval:

Temporary Construction Noise

- The project shall comply with the following temporary construction noise control measures:
 - Turn of 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 back-up alarms.
 - Equipment staging areas should be placed at locations away from noise sensitive receivers.

With the incorporation of the aforementioned conditions of approval, the project would comply with the General Plan Noise Ordinance.

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 standard conditions of approval. The aforementioned conditions were identified within the GPU EIR as mitigation measure Noi-4.2. 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 is for the subdivision of 24 residential lots, with one remainder lot, which are sensitive receptors to low ambient vibration. However, the residences would be setback more than 600 feet from the following uses: any public road or transit right-of-way with projected noise contours of 65 dB or more; from any property line for parcels zoned industrial or extractive use; or any permitted extractive uses. A setback of 600 feet ensures that the operations would not be impacted by groundborne vibration or groundborne noise levels (Harris, Miller Miller and Hanson Inc., Transit Noise and Vibration Impact Assessment 1995).

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 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) The GPU EIR concluded this impact to be significant and unavoidable. As indicated in response 12(a), the project would not expose existing or planned noise sensitive areas in the vicinity to a substantial permanent increase in noise levels that exceed the allowable limits of any applicable noise standards with the incorporation of standard project conditions identified by the GPU EIR as Noi-4.2. In addition, the project is not expected to expose existing or planned noise sensitive areas to noise 10 db CNEL over existing ambient noise levels. Therefore, the propose project will not cause any significant impacts to any existing or future noise sensitive land uses.

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 the incorporation of mitigation measures listed in response 13(a). 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. In addition, general construction noise is not expected to exceed the construction noise limits of the Noise Ordinance with the implementation of standard conditions of approval listed in response 13(a). Construction operations would occur only during permitted hours of operation. Lastly, the project would not operate construction equipment in excess of 75 dB for more than 8 hours during a 24-hour period.

As previously discussed, the GPU EIR determined impacts from temporary increase in ambient noise levels to be less than significant with mitigation. However, the project would have a less than significant impact with project conditions of approval listed in response 13(a). Therefore, the project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 13(e) The GPU EIR concluded this impact to be less than significant with mitigation. The project is not located within an Airport Land Use Compatibility Plan or within 2 miles of a public airport

or public use airport. Therefore, the project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 13(f) The GPU EIR concluded this impact to be less than significant with mitigation. The project is not located within a one-mile vicinity of a private airstrip. Therefore, the 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. Feasible mitigation measures contained within the GPU EIR (Noi-4.2) have been incorporated into the project as conditions of approval. The mitigation measure, as detailed above, requires the project applicant to comply with the County Noise Ordinance.

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

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

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

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

14(a) The GPU EIR concluded this impact to be less than significant. The project site is designated by the General Plan as VR-2 and is Zoned RR. Development of the project is consistent with the Zoning Ordinance and the density established under the General Plan. As such, the project would not introduce substantial unplanned population growth in the areas as development of the site was accounted for within the GPU and certified EIR. In addition, the project has obtained service availability forms for fire, schools, sewer and water indicating the availability to serve the project.

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

- 14(b) The GPU EIR concluded this impact to be less than significant. The project would remove one residential structure from the project site. However, due to a fire in 2014, one residential structure has burned down, leaving the remaining residential structure on the lot vacant. In addition, the project would subdivide a 17.16-acre property into 24 residential lots, with one remainder lot. As such, replacement housing would not be required elsewhere.

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

- 14(c) The GPU EIR concluded this impact to be less than significant. As indicated in response 14(b), the project would only remove one residential structure that is not occupied. Therefore, the project would not require the displacement any people.

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

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?

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

15(a) The GPU EIR concluded this impact to be less than significant with mitigation for the exception of school services, which remained significant and unavoidable. Project Facility Availability forms were provided for Fire, School, Sewer and Water. Fire protection service would be provided by the Lakeside Fire Protection District with a 2.35-minute response time. School services would be provided by the Grossmont Union High School District and the Lakeside Union School District. The Lakeside Union School District indicated that the project may result in overcrowding of the Lakeside Middle School and Lemon Crest Elementary. The GPU EIR recognized that the GPU would accommodate increases in population and housing that would therefore result in an increase in school enrollment. Because the planning, design, approval, and construction of school facilities is not within the County’s jurisdiction and is the responsibility of the individual school districts, impacts to school services remained significant and unavoidable. Although the project could result in overcrowding in these schools, the project would not result in impacts (new impacts or an increase in severity of impacts) that were not adequately analyzed by the GPU EIR. In addition, the project would be required to pay a fee or dedicate land in accordance with the Education Code Section 17620 prior to the issuance of building permits, as indicated within the Project Facility Availability form. This measure was identified by the GPU EIR as Pub-3.2 for implementation of Board Policy I-84 regarding Project Facility Availability and Commitment for Public Sewer, Water, School and Fire Services. Lastly, sewer and water services would be provided by the San Diego County Sanitation District Lakeside Service Area. A 900-foot long public water/sewer extension would be required but would not result in the need for significantly altered services or facilities; the District indicated their ability to serve the project.

As previously discussed, the GPU EIR determined impact to fire protection services, police protection services and other public services as less than significant with mitigation while school services remained significant and unavoidable. The project would have a less than significant impact on all services for the exception of schools. The project would pay a fee or dedicate land in accordance with the Education Code Section 17620 prior to the issuance of building permits. This measure was identified by GPU EIR as Pub-3.2 Therefore, 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. Feasible mitigation measures from the GPU EIR (Pub-3.2) would be applied to the project. This mitigation measure, as detailed above, requires the project to conform to Board Policy Pub-3.2 which requires project Facility Availability and Commitment for Public Sewer, Water, School and Fire Services.

Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
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16. Recreation – Would the Project:

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

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

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

16(a) The GPU EIR concluded this impact to be less than significant with mitigation. The project could increase the use of existing parks and other recreational facilities; however, the project would be required to comply with the County’s Park Land Dedication Ordinance (PLDO). The PLDO is the mechanism that enables the funding or dedication of local parkland in the County. The project is for a residential subdivision of a 17.16-acre property into 24 lots, with one remainder lot. To avoid any physical deterioration of local recreation facilities, the project would be required to pay park fees prior to building permit issuance. The PLDO in-lieu dedication fees for new development is discussed in GPU EIR Section 2.14.3.1 Issue 1: Deterioration of Parks and Recreational Facilities, Federal State and Local Regulations and Existing Regulatory Processes.

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

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 such as parks.

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

Conclusion

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

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

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

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

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

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

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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- d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?
- e) Result in inadequate emergency access?
- f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

A Request for Exceptions to Public Road Standards approved by Derek Gade of the Department of Public Works, dated November 7, 2017, has been prepared for the project. The responses below have incorporated analysis from the Request for Exceptions to Public Road Standards.

Discussion

17(a) The GPU EIR concluded this impact to be significant and unavoidable. The County of San Diego Transportation Study Guidelines have been adopted by the County Board of Supervisors on June 24, 2020 to address Senate Bill 743 (SB 743). SB 743 changed the way that public agencies evaluate transportation impacts under CEQA. A key element of this law is the elimination of using auto delay, Level of Service (LOS), and other similar measures of vehicular capacity or traffic congestion as a basis for determining significant transportation impacts under CEQA. The new established criteria for determining the significance of transportation impacts is Vehicle Miles Traveled (VMT) and is further addressed below. Although no longer utilized as the standard for evaluating transportation impacts under CEQA, the County’s General Plan identified LOS as being a required analysis per Policy M-2.1 and is therefore also addressed.

Section 15064.3 of the CEQA Guidelines details new regulations, effective statewide July 1, 2020, based on SB 743 that sets forth specific considerations for evaluating a project’s transportation impacts. As previously discussed, the new established criteria for determining the significance of transportation impacts is Vehicle Miles Traveled (VMT). VMT refers to the amount and distance of automobile travel attributable to a project. The project would subdivide a 17.16-acre property into 24 residential lots, with one remainder lot. Pursuant to the new adopted Transportation Study Guidelines Section 2.2, Table 1, the project meets the CEQA VMT screening criteria for Projects Located in VMT Efficient Areas per the location-based screening maps and would not be required to prepare a CEQA VMT analysis. In addition, the average VMT per resident for the project area is estimated at 23.97 pursuant to the location-based screening maps and is below the threshold by the Transportation Study Guidelines. The VMT threshold for a residential project is fifteen percent below the Unincorporated County average VMT per resident. The Unincorporated County average VMT per resident is 32.54 and fifteen percent below this is 27.66. Because the project is located within a VMT Efficient Area and is below the adopted VMT threshold, the project would not conflict with an applicable plan, ordinance or policy related to VMT.

A Local Mobility Analysis is the tool utilized by the Transportation Study Guidelines to assess projects impacts to LOS. However, the Transportation Study Guidelines have also adopted thresholds for determining when a project must prepare a Local Mobility Analysis

based on project type and number of trips, as determined by Section 2.2, Table 2. The project is consistent with the County General plan and would result in less than 250 ADT based on the Institute of Transportation Engineers Trip Generation rates. The project would result in 226.56 ADT. Pursuant to the Transportation Study Guidelines, a Local Mobility Analysis would not be warranted for the project. Therefore, the project would not conflict with an applicable plan, ordinance or policy related to local mobility.

In addition, the County of San Diego has developed an overall programmatic solution that addresses existing and projected future road deficiencies in the unincorporated portion of San Diego County. The Transportation Impact Fee (TIF) program creates a mechanism to proportionally fund improvements to roadways necessary to mitigate potential cumulative impacts caused by traffic from future development. The potential growth represented by this project was included in the growth projections upon which the TIF program is based. The TIF measures was identified by the GPU EIR as Tra-1.7.

Mitigation Measure

The following list includes project's conditions of approval:

Payment into the TIF Program

- The applicant would be required to pay into the County TIF program prior to building permit issuance.

Lastly, the project would not conflict with policies related to non-motorized travel such as mass transit, pedestrian, or bicycle facilities. The project would improve the project frontage along Lemon Crest Drive, including curb, gutter and sidewalk, pursuant to the Subdivision Ordinance Section 81.404 and the Community Trails Master Plan. The GPU EIR identified this measure as Tra-4.4 and Tra-6.9.

As previously discussed, the GPU EIR determined significant and unavoidable impacts to unincorporated County traffic and LOS standards. However, the project would have a less than significant impact to County traffic and LOS standards with the incorporation of mitigation as detailed above. The mitigation measure was identified in the GPU EIR as Tra-1.7, Tra-4.4 and Tra-6.9 which require payment into the County TIF program as well as implementation of the County Subdivision Ordinance and the Community Trails Master Plan. In addition, the project would not conflict with SB 743 because it is located within a VMT-Efficient Area and is below the County's adopted VMT threshold. Therefore, the project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 17(b) The GPU EIR concluded this impact to be significant and unavoidable. The designated congestion management agency for the County is the San Diego Association of governments (SANDAG). In October 2009, the San Diego region elected to be exempt from the State CMP and, since this decision, SANDAG has been abiding by 23 CFR 450.320 to ensure the region's continued compliance with the federal congestion management process.

As previously stated, Section 15064.3 of the CEQA Guidelines details new regulations, effective statewide July 1, 2020 that sets forth specific considerations for evaluating a project's transportation impacts. As discussed in 17(a), the project would not result in an

impact to VMT due to the location in a VMT Efficient Area and the project trips below the County VMT threshold. In addition, the project would not conflict with GPU Policy M-2.1 because the project trips are below the Transportation Study Guidelines threshold for requiring a Local Mobility Analysis. Therefore, the project would not conflict with an applicable congestion management program.

As previously discussed, the GPU EIR determined impacts on significant and unavoidable impacts to unincorporated County traffic and LOS standards. However, the project would have a less than significant impact 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.

- 17(c) The GPU EIR concluded this impact to be less than significant with mitigation. The project is not located within an Airport Safety Zone, Avigation Easement, Overflight area, or within two miles of a public airport. However, the project is located approximately 2.65-miles east of the Gillespie Airport and is located within a Federal Aviation Administration (FAA) Height Notification Surface Area. The project is consistent with the County Zoning Ordinance, allowing a maximum height of 35-feet. Because the project would not reach a significant height in elevation (i.e. 200 feet), the project would not result in a change in air traffic patterns, including either an increase in traffic levels or a change in the location that results in substantial safety risks. In addition, the project applicant is required to notice the FAA prior to construction pursuant to Federal Regulation Title 14 Part 77 which establishes standards and notification requirements.

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

- 17(d) The GPU EIR concluded this impact to be significant and unavoidable. The project would not substantially alter traffic patterns, roadway design, place incompatible uses (e.g., farm equipment) on existing roadways, or create curves, slopes or walls which would impede adequate sight distance on a road. The project would improve roadway safety near the project site as compared to existing conditions. The project would be conditioned to implement design features along the project frontage as indicated in the project Design Exemption Request (DER) reviewed and approved by the County of San Diego Department of Public Works. These conditions include the following: a reduction of the speed on Lemon Crest Drive at the project frontage from 30 miles per hour (MPH) to 25 MPH; a shift in the centerline of Lemon Crest Drive toward the project site resulting in a straighter roadway curve; and connect and extend the sidewalk, curb and gutter from the school site to the project site. These conditions were identified by the GPU EIR as Tra-4.4 and Tra-6.9. The project would also require the submittal of a sight distance certification prior to any permit as a standard condition of approval. Pursuant to review and approval of the Design Exemption Request, the project would meet all sight distance requirements and meet the 250 feet of vertical curve length on the road. Therefore, the project would not substantially increase hazards, but would implement design features to improve the existing roadway condition.

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 mitigation identified by the GPU EIR as Tra-4.4 and Tra-6.9. 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 Lakeside Fire Protection District has reviewed the project and the Fire Protection Plan and have determined that there is adequate emergency fire access. In addition, consistent with GPU EIR mitigation measure Tra-4.2, the project would implement the Building and Fire codes to ensure emergency fire apparatus 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 for the reasons detailed above and with the implementation of 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, pedestrian or bicycle facilities. 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 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 (Tra-1.4, Tra-4.2, Tra-4.4 and Tra-6.9) would be applied to the project. The mitigation measures, as detailed above, would require payment into the County TIF Program as well as consistency with the Building Code, Fire Code, Subdivision Ordinance and Community Trails Master Plan.

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

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

Discussion

18(a) The GPU EIR concluded this impact to be less than significant with mitigation. The project would discharge domestic waste to a community sewer system that is permitted to operate by the Regional Water Quality Control Board (RWQCB). A project facility availability form has been received from the San Diego County Sanitation District Lakeside Service Area that indicates that there is adequate capacity to serve the project. Therefore, the project would be consistent with the wastewater treatment requirements of the RWQCB as determined by the authorized, local public agency.

As previously discussed, the GPU EIR determined impacts on wastewater treatment requirements to be less than significant. As the project would have a less than significant impact for the reasons detailed above, the project would be consistent with the analysis

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

- 18(b) The GPU EIR concluded this impact to be less than significant with mitigation. The project involves the extension of wastewater and water pipeline extensions. However, these extensions would not result in additional adverse physical effects beyond those already identified in other section of this 15183 Checklist. In addition, project availability forms have been received for both water and sewer from the San Diego County Sanitation District Lakeside Service Area that indicates adequate capacity to serve the project. Therefore, the project would have sufficient water supplies and wastewater facilities available and would not require the construction of new water or wastewater treatment facilities that would cause a significant effect.

As previously discussed, the GPU EIR determined impacts to adequate water supplies 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

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

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

- 18(d) The GPU EIR concluded this impact to be significant and unavoidable. A service availability form from the San Diego County Sanitation District Lakeside Service Area has been provided which indicates that there is adequate water supply to serve the project.

As previously discussed, the GPU EIR determined impacts to adequate water supplies 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.

- 18(e) The GPU EIR concluded this impact to be less than significant with mitigation. A Service Availability Letter from the San Diego County Sanitation District Lakeside Service Area has been provided which indicates that there is adequate capacity to serve the project.

As previously discussed, the GPU EIR determined impacts to adequate wastewater facilities 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.

18(f) The GPU EIR concluded this impact to be less than significant. All solid waste facilities, including landfills require solid waste facility permits to operate. There are five, permitted active landfills in San Diego County with remaining capacity to adequately serve the project. Therefore, the project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

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

Conclusion

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

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

Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
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19. Wildfire – If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the Project:

a) Substantially impair an adopted emergency response plan or emergency evacuation plan?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

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

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

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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A Fire Protection Plan was prepared by J. Charles Weber of J. Charles Weber Fire and Life Safety Consultant, dated August 2, 2016. The responses below are based on the analysis provided within the prepared Fire Protection Plan.

Discussion

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

- 19(a) The project would develop a 24-lot residential subdivision, with one remainder lot, on a 17.16-acre property with access from Lemon Crest Drive. The project site is located within the moderate, high and very high fire hazard severity zones (FHSZ). The project site would be serviced by the Lakeside Fire Protection District, with Fire Station #1 the closest fire station to the project site approximately 1-mile northwest at 9726 Riverview Avenue. According to the fire service availability form signed by the Lakeside Fire Protection District, the site would have an emergency response time of 2.35 minutes which meets the General Plan Safety Element standard of 5 minutes. The form also indicated that adequate services exist to serve the project. Further, the project would be required to be consistent with the County Consolidated Fire Code and Building Code, identified by the GPU EIR as Haz-4.3. Therefore, the project would not substantially impair an adopted emergency response plan or emergency evacuation plan.

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 and with the incorporation of the GPU EIR mitigation measure Haz-4.3. This measure requires the project to comply with the Fire Code and Building Code. Therefore, the project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 19(b) The GPU EIR concluded this impact to be significant and unavoidable. As indicated above in response a), the project is located within a moderate, high, and very high FHSZ. However, the majority of the County is in the High and Very High FHSZ. Accordingly, the County has implemented fire safety measures depending on specific factors, such as location, vegetation, etc. The project has prepared a Fire Protection Plan which has been approved by the Lakeside Fire Protection District. The project would not exacerbate wildfire risk due to slope, prevailing winds or other factors because the project site would not develop any steep slopes, does not contain any significant geological features that would influence wildland fire behavior, and is surrounded by development.

The project would also be required to meet applicable fire measures such as fire sprinklers, site inspections, premises identification, fire apparatus access, access road requirements, fire hydrants, identified by the GPU EIR as Haz-4.3, and would require brush management,

identified by the GPU EIR Haz-4.2. Additionally, the Lakeside Fire Protection District has indicated the availability to serve the site in the case that a fire would occur. The nearest fire station is located approximately 1 mile from the project site and would meet the maximum travel time pursuant to the General Plan Safety Element.

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 and with the incorporation of the GPU EIR mitigation measures Haz-4.2 and Haz-4.3. The project would be consistent with the GPU EIR mitigation measure Haz-4.3 for compliance with the Building and Fire Code and the project has incorporated the GPU EIR Mitigation Measure Haz-4.2 for brush management as a project design feature. Therefore, the project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 19(c) The GPU EIR concluded this impact to be significant and unavoidable. The project would require the installation or maintenance of the following associated infrastructure: private roads, fuel breaks, and sewer/water connections. 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. Additionally, please refer to 19(a) for the travel times associated with the road infrastructure and 19(b) for all applicable fire hazard conditions and project design features.

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 and with the incorporation of the GPU EIR mitigation measures Haz-4.2 and Haz-4.3. The project would be consistent with the GPU EIR mitigation measure Haz-4.3 for compliance with the Building and Fire Code and the project has incorporated the GPU EIR Mitigation Measure Haz-4.2 for brush management as a project design feature. Therefore, the project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 19(d) The GPU EIR concluded this impact to be significant and unavoidable. As stated in response 10(f), the Hydraulic Study concluded the project would not alter existing drainage patterns onsite in a manner which would result in flooding on or offsite. The project would be designed with tree wells and expanded basins to capture the peak runoff rates. The basins would be adequately sized to attenuate post-project peak flow rates in the event a 100-year storm event would occur. In addition, as stated in responses 10(i) and 10(j), the project is not located within a 100-year flood hazard area, floodway, or floodplain and would not be impacted from downstream flooding. Further, as concluded in 7(a)(IV), although the site is located within a landslide susceptibility area per County GIS, the project would be required to prepare a geotechnical report prior to ground disturbance activities as a standard condition of approval. The GPU EIR identified the standard condition of a geotechnical report within section 2.6.3.1, Federal, State and Local Regulations and Existing Regulatory Processes, Liquefaction. In addition, the project would not develop any steep slopes. The project would also include defensible space, including a 100-foot fuel modification zone, as required by the Lakeside Fire Protection District. Therefore, the project would not expose people or structures to a significant risk, including downslopes or

downstream flooding or landslides, as a result of runoff, post-fire instability, or drainage changes.

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 with the incorporation of GPU EIR mitigation measures Haz-4.2 and Haz-4.3 as well as a required geotechnical report. The GPU EIR identified the standard condition of a geotechnical report within section 2.6.3.1, Federal, State and Local Regulations, and Existing Regulatory Processes, Liquefaction. Haz-4.3 requires compliance with the Building and Fire Code and the project has incorporated the GPU EIR Mitigation Measure Haz-4.2 for brush management as a project design feature. 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

The GPU EIR concluded significant and unavoidable impacts associated with wildfire under Section 2.7, Hazards and Hazardous Materials. Based on the project Fire Protection Plan, and the incorporation of project design features and mitigation measures, impacts associated with wildfire would be less than significant. Therefore, the project would not exacerbate wildfire risks and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire.

Therefore, 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), as well as a Geotechnical Report described above, would be applied to the project. These mitigation measures, as detailed above, requires the project applicant to implement brush management and comply with the building and fire codes.

Appendices

Appendix A – References

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

Appendix A

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

Carrico, Richard; Recuerdos Research, (September 10, 2017), Final Archaeological Letter Report for a Negative Archaeological Survey of the Steward Parcel at 12361 Lemon Crest Drive (TM-5582) and PDS2014-ER-14-14-005, Lakeside, California

Cummings, Gretchen; Cummings and Associates, (May 13, 2020), Biological Letter Report and Biological Survey Update

Gade, Derek; Department of Public Works, (November 7, 2017), Request for Exceptions to Public Road Standards

Rymer, Pat, P.E. Civil Engineer, (February 12, 2019), Hydraulic Study

Rymer, Pat, P.E. Civil Engineer, (May 16, 2019), A Priority Development Project (PDP) Storm Water Quality Management Plan (SWQMP)

Smith, Ashley and White, Kendalyn; County of San Diego, (July 29, 2020), Multiple Species Conservation Program Conformance Statement

Way, Alyssa; County of San Diego, (August 11, 2020), Air Quality and Greenhouse Gas Analysis

Weber, Charles; Charles Weber Fire and Life Safety Consultant, (August 2, 2016), Fire Protection Plan

References

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

http://www.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.sdcountry.ca.gov/pds/gpupdate/GPU_FEIR_Summary_15183_Reference.pdf