



# County of San Diego

**MARK WARDLAW**  
DIRECTOR

PLANNING & DEVELOPMENT SERVICES  
5510 OVERLAND AVENUE, SUITE 310, SAN DIEGO, CA 92123  
(858) 505-6445 General  
www.SDCPDS.org

**KATHLEEN A. FLANNERY**  
ASSISTANT DIRECTOR

June 25, 2020

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

**Project Name:** San Pasqual Valley Road Tentative Map  
**Project Record Numbers:** PDS2017-REZ-17-001; PDS2017-TM-5620; PDS2017-AP-17-001  
**Environmental Log Number:** PDS2017-ER-17-08-009  
**APNs:** 234-261-23-00, 234-440-05-00, 234-430-21-00

**Lead Agency Name and Address:**  
County of San Diego  
Planning and Development Services  
5510 Overland Avenue, Suite 110  
San Diego, CA 92123-1239

**County Staff Contact:**  
Jenna Roady, Project Environmental Coordinator  
(858) 495-5437  
Jenna.Roady@sdcounty.ca.gov

**Project Location:**  
The proposed project is located within the unincorporated community of North County Metro in northern San Diego County. The 18.2-acre Project site is located at 2260 San Pasqual Valley Road, a segment of the California Department of Transportation (Caltrans) State Route 78 (SR-78). The City of Escondido limits are located 1 mile from the project site to the north, east and west and 2.3 miles from the project site to the south. The Project site is surrounded by residential, equestrian and agricultural use types.

**Project Applicant Name and Address:**  
K A E Investments  
24 Painted Feather Way  
Las Vegas, NV 89136

**General Plan**

Community Plan: North County Metro  
Regional Categories: Semi-Rural  
Land Use Designations: Semi-Rural Residential (SR-1)  
Density: SR-1 (1 dwelling unit per gross acre, slope dependent)  
Floor Area Ratio (FAR) N/A

**Zoning**

**Use Regulation:** Limited Agriculture (A70)  
Minimum Lot Size: 1 dwelling unit per 1 acre  
Special Area Regulation Agricultural Preserve (A)

**Description of Project:**

The proposed San Pasqual Valley Road Tentative Map project (Project) is for the subdivision of an 18.2-acre project site into 14 residential lots and associated improvements. Project improvements include private roads, two security gates, hydrants, street lighting, noise barriers, landscaping and stormwater basins. A single-family residence with an approved wastewater treatment (septic) system currently exists on-site and would be retained on lot 1 of the proposed Tentative Map (TM). Access would be provided by private road easements connecting to San Pasqual Valley Road. Grading for the Project would be balanced on-site requiring the cut and fill of 21,500 cubic yards of material. Water would be provided by the City of Escondido and each lot would be provided with on-site septic. Fire services would be provided by the Escondido Fire Department and school services would be provided by the Escondido Union School District and Escondido Union High School District.

The Project would also require the cancellation of a County Agricultural Preserve and a rezone to remove the Agricultural Preserve, "A", Special Area Designator from the zone box. Historically, the project site was used for agricultural purposes, including an orchard, but appeared to have been abandoned in 2006 per historic aerial review. No active agricultural use types exist on-site today.

Existing Site Conditions

In general, the site exhibits moderately sloping topography toward the south and west, with a hill in the central portion of the site. Approximate elevations within the overall site limits range from a low elevation of 655 mean sea level (msl) at the southwesterly boundary to a high of 770 msl near the northeasterly boundary. The 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 disturbed, urban/developed, and a Coast Live Oak and Eucalyptus-dominated drainage area. The drainage lies on the western portion of the site in a southwesterly direction. Besides the onsite drainage supporting riparian habitat, no other special features exist onsite including rock outcropping or geologic features. In addition, the project site does not contain any significant geologic features that would influence wildland fire behavior.

Discretionary Actions:

Discretionary permits for the Project include a Rezone to remove the "A" Special Area Designator, a Tentative Map to subdivide the 18.2-acre site into 14 lots, and the cancellation of the Agricultural Preserve to remove the development encumbrances. 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](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 an 18.2-acre lot into 14 residential lots, which is consistent with the development density established by the General Plan and Certified by the GPU EIR. The Project Site is designated SR-1 by the General Plan, allowing for 1 single-family residence per lot. The project is also consistent with the General Plan Table LU-2, Density Formula for Slope-Dependent Lands as evaluated in the GPU EIR. Because the project has a Land Use Designation of Semi-Rural (SR-1) and contains slopes of less than 25 percent on a majority of the site, density was calculated via the summation of the following: 1 dwelling unit per gross acre with less than a 25% maximum slope (17.35 ac.); 1 dwelling unit per 2 gross acres between a 25% and 50% maximum slope (0.85 ac). Maximum allowable density for the project site pursuant to Table LU-2 is 17 dwelling units, and the project proposes 14 single-family residential lots. 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, estate residential lots with associated accessory uses. The property does not support any peculiar environmental features, and the Project would not result in any peculiar effects.

In addition, as explained further in the 15183 Checklist below, all Project impacts were adequately analyzed by the GPU EIR. The Project could result in potentially significant impacts to Biological Resources, Cultural Resources, Hydrology and Water Quality, Noise, 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.

|   |   |
|---|---|
| _____<br>Signature                          | <b>June 25, 2020</b><br>_____<br>Date                       |
| <b>Jenna Roady</b><br>_____<br>Printed Name | <b>Land Use/Environmental<br/>Planner</b><br>_____<br>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.

|  | <b>Significant<br/>Project<br/>Impact</b> | <b>Impact not<br/>identified<br/>by GPU EIR</b> | <b>Substantial<br/>New<br/>Information</b> |
|--|---|---|--|
|--|---|---|--|

**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 North County Metro Community plan area at 2260 San Pasqual Valley Road, a segment of the Caltrans SR-78, and a County Designated Scenic Corridor. For further information on scenic highways, refer to response 1(b).

While the RCAs within a 5-mile radius of the site are generally focused on sensitive habitats, the following has been identified as visual resources: Valley Center Ridge and Mount Woodson. Valley Center Ridge is located 4.1 miles North of the Project site while Mount Woodson is located 4.3 miles South of the Project Site. Due to distance and elevation of the Project site, the Project would not detract from any views of the aforementioned RCAs. In addition, the Project would not diminish any viewsheds from the RCAs due to distance, intervening topography, 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 proposed Project would have a less than significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 1(b) The GPU EIR concluded this impact to be less than significant with mitigation. State scenic highways refer to those highways that are officially designated by 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. An 18.2-mile segment of the SR-78 has been designated as a State Scenic Highway but the segment is located 33 miles east of the project site through the Anza Borrego State Park. However, the County General Plan 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 San Pasqual Valley Road and Bear Valley Parkway. No direct views of the project site are available from Bear Valley Parkway due to intervening topography and development.

The project site is located on San Pasqual Valley Road, a portion of SR-78, and views from the roadway would be available to the site. The eastern portion of the SR-78 includes vast rural lands with varied topography. Vegetation includes grasslands, various trees, and shrubs. When driving west on the SR-78, rural residential land uses, such as ranches and agricultural land, slowly become more prominent. Surrounding the project site, these lands are intermixed with slightly higher residential densities of 1 unit per acre. The residences to the north of the project site are located on land a little over 1 acre, while the residences to the east are located on land less than a half-acre. The residences to the south across San Pasqual Valley Parkway are located on land slightly less than 1 acre each. Southeast of the site across San Pasqual Valley Parkway commercial agricultural use types are present while southwest of the site, land uses such as equestrian, rural residential, and agricultural are present. Directly west of the site there is a drainage with additional residential use types west of drainage.

The proposed project would develop an 18.2-acre lot into 14 individual 1-acre residential lots. The proposed density is consistent with the density allowed per the County of San Diego Zoning Ordinance and General Plan. The proposed lots would be of similar size to the residential lots within the surrounding vicinity, as described above. In addition, along the project frontage on San Pasqual Valley Road, a 4-foot berm with a 6-foot high wall is proposed and would aid as a visual buffer. As a design feature specified within the Landscape Plan, the Project would also plant large trees (Fruitless Olive Trees) intermixed with large shrubs (Lemonade Berry, Scrub Oak, and Toyon) in-between and in-front of the trees. Portions of the dwelling units closest to the road could still be seen through the vegetation and above the wall but would not introduce substantially damage scenic resources.

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



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

The existing visual character and quality of the Project surroundings are characterized by vast rural lands with varied topography, grasslands, trees, shrubs, agricultural and residential use types. The surrounding residential uses vary from rural large-lot single-family residential land to smaller residential lots less than half an acre. Equestrian uses are also prominent in the area as accessory to residences. In addition, agricultural use types are found in the Project surroundings ranging from commercial horticulture and row crops, to orchards and groves that are accessory to residential use types.

As described above, the residential densities vary within the Project area. 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, consistency with surrounding residential use types, and visual screening (wall, berm and vegetation) from San Pasqual Valley Road. 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 proposed Project would be consistent with surrounding development bulk and scale. Thus, the proposed 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 proposed Project would not create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area.

As previously discussed, the GPU EIR determined impacts from light or glare to be significant and unavoidable. However, the proposed Project would have a less than significant impact with no required mitigation for the reasons detailed above. Therefore, the Project would be

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

**Conclusion**

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

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

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

**Discussion**

A Local Agricultural Resource Assessment (LARA) model was prepared for the Project by the County of San Diego planner Jeff Smyser on October 3, 2017.

- 2(a) The GPU EIR concluded this impact to be significant and unavoidable. The Project site is underlain by land designated as Unique Farmland and Farmland of Statewide Importance by the Department of Conservation State Farmland Mapping and Monitoring Program (FMMP). Historically, the site has his been used for agricultural purposes (orchard). However, per historic aerial imagery, it is approximated that the orchard was abandoned in 2006. No active agricultural use types exist onsite today.

According to the LARA model prepared for the Project, the site is not an important agricultural resource. The County uses the Local Agricultural Resource Assessment (LARA) model to assess the relative value of agricultural resources in the County of San Diego. The LARA Model resulted in a high rating for climate and water but resulted in a low rating for soil. Pursuant to the County Guidelines for Determining Significant for Agricultural Resources (Guidelines), if any of the aforementioned factors result in a rating of “low”, the site would not be considered a significant agricultural resource due to the lack of all important “primary factors”.

The site has been mapped by FMMP as Unique Farmland and Statewide Importance. In order to qualify for the aforementioned mapping, the site must have been “cropped” for agricultural purposes within the last 4 years prior to the last FMMP mapping effort. FMMP maps are updated every two years with the use of aerial photographs, a computer mapping system, public review, and field reconnaissance. The project site has not been used for agricultural purposes since 2006 and has therefore been allocated incorrect mapping categories pursuant to the required criteria. Due to the widespread mapping effort by the DOC for the FMMP in California, categories may be inaccurately applied. In addition, FMMP is non-regulatory and was created for providing decision makers consistent and impartial data for use in assessing agricultural land resources in California. Therefore, because the site was determined to not be a significant agricultural resource by the County LARA model, is not an active agricultural operation, and has not been used for agricultural purposes since 2006, impacts would be less than significant.

As previously discussed, the GPU EIR determined impacts from direct and indirect conversion of agricultural resources to be significant and unavoidable. As the proposed Project would have a less than significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 2(b) The GPU EIR concluded this impact to be less than significant with mitigation. The Project site is zoned Limited Agriculture (A70), is within a County Agricultural Preserve, but is not currently located within a Williamson Act Contract (Contract).

The A70 zone is intended to create and preserve areas intended primarily for agricultural crop production. However, the majority of the zones within the County of San Diego allow for agricultural use types, such as row crops and field crops, cultivation, and tree crops. Out of the 37 zones within the county, 31 allow for agricultural use types while 6 do not allow for agricultural use types. In addition, the A70 zone does not preclude other types of development, such as single-family residential. The proposed project is consistent with the agricultural zone of the site. In addition, the site is not an active agricultural operation.

The Project site was previously under a Contract, but a notice of nonrenewal was filed in 1984, effectively terminating the Contract January 1, 1995. The site is however still currently under a County Agricultural Preserve. The Williamson Act empowers any city or county having a general plan to establish, by resolution after a noticed public hearing, Agricultural Preserves consisting of lands devoted to agricultural uses and related compatible uses. In the County of San Diego,

Board Policy I-38 (Policy) enacts provisions for the implementation of the Williamson Act. It also designates properties in the County that are subject to a Williamson Act Contract or Agricultural Preserve, a Special Area Designator for Agricultural Preserve "A", through the County Zoning Ordinance. Through the Policy and the Zoning Ordinance, preserves are established for the purpose of defining the boundaries of those areas within the County which will be willing to enter into contracts pursuant to the act. Because the previous Contract for the site has been terminated and the site is not in active agricultural production, a rezone to remove the "A" Special Area Designator and an Administrative Permit to removal the parcel from the Agricultural Preserve is proposed for consistency with Board Policy I-38.

Both County Agricultural Preserves and Williamson Act Contracts are present within the immediate vicinity 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. The closest Contracts are both located 0.5 miles (2,640 feet) from the Project site, one north west and one south west. Due to distance, the Project would not conflict with any Williamson Act Contract. The nearest County Agricultural Preserve to the Project site is located 210 feet east, across Highgrove Drive, from the easternmost property line. However, the easternmost property line is extended out 178-feet from the rest of the property. This 178-foot strip would only be used for emergency personnel. No associated interface conflicts or impacts are anticipated from implementation of the proposed Project due to intervening distances. No residence or yard would be located within 300 feet of an agricultural preserve. 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 proposed Project would have a less than significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 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 8.3 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.

|  | <b>Significant<br/>Project<br/>Impact</b> | <b>Impact not<br/>identified<br/>by GPU EIR</b> | <b>Substantial<br/>New<br/>Information</b> |
|--|---|---|--|
| <b>3. Air Quality</b> – 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)?
- d) Expose sensitive receptors to substantial pollutant concentrations?
- e) Create objectionable odors affecting a substantial number of people?

**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 proposed Project is for the subdivision of one 18.2-acre parcel to 14 lots and is consistent with the density allowed on the Project site per the county General Plan and Zoning Ordinance. Therefore, the Project was anticipated in RAQS and SIP would not conflict.

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

3(b) The GPU EIR concluded impacts to be significant and unavoidable. The project would grade 26,300 cubic yards of soil and quantities would be balanced onsite. Emissions from the grading and construction phases would be minimal, temporary and localized, resulting in pollutant emissions below the screening-level criteria established by the Guidelines for Determining Significance for Air Quality.

Operational emissions for the Project would be associated with vehicle trips to and from the Project site. The vehicle trip generation for the Project would be 140 for the 14 residences. According to the Bay Area Air Quality Management District CEQA Guidelines for Assessing the Air Quality Impacts of Projects and Plans, projects that generate less than 2,000 ADTs are below the screening-level criteria. The Project ADTs would be far below this threshold and would therefore not have a significant impact from vehicle emissions.

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/m<sup>3</sup>). 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.

|   |   |  |
|---|---|--|
| <b>Significant<br/>Project<br/>Impact</b> | <b>Impact not<br/>identified by<br/>GPU EIR</b> | <b>Substantial<br/>New<br/>Information</b> |
|---|---|--|

**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?

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

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

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

**Discussion**

A Biological Letter Report was prepared for the Project by Pacific Southwest Biological Services, Inc. on June 3, 2020.

4(a) The GPU EIR concluded this impact to be significant and unavoidable. Biological resources on the Project site were evaluated in the Biological Letter Report prepared by Pacific Southwest Biological Services, Inc. The site is comprised of the following habitat types: 0.9-acre of urban/developed, 16.3-acres of non-native grassland, and 0.9-acre of Southern Coast Live Oak Riparian/ Eucalyptus Woodland. Per the Biological Letter Report, the site does not contain any special status plant or animal species. 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.

As previously discussed, the GPU EIR determined impacts to special status species as significant and unavoidable. However, the proposed Project would have a less than significant impact with mitigation for MBTA Provisions identified in the GPU EIR as Bio-1.6 and -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. As stated in response 4(a), the project site includes habitat for .9-acre of Southern Coast Live Oak Riparian/ Eucalyptus Woodland and 16.3-acres of non-native grassland. Non-native grassland is considered a sensitive natural community within the County of San Diego. The Project would impact 10.92-acres of non-native grassland requiring mitigation at a 0.5: 1.0 ratio. Additional details of the riparian community and wetlands onsite are provided below.

The Southern Coast Live Oak Riparian/Eucalyptus Woodland vegetation community onsite exists in both an eastern and western channel and is primarily comprised of a mix of eucalyptus and Coast live oak as well as some Canary island date palms and scattered Willows. The eastern channel conditions meet the County's Resource Protection Ordinance criteria for a wetland while although the western drainage does meet the criteria, it does not occur on the Project site. However, the riparian fringe of the western drainage does occur on the Project site and is represented by Coast live oak trees, a riparian habitat. Both drainages are jurisdictional under the California Fish and Game and Army Corps of Engineers. The Project would not impact either drainage for the exception of removal of flammable non-native vegetation required per the Escondido Fire Department. The Project has also placed a biological open space easement over the drainages onsite with appropriate setbacks as Project design features.

Project Design Feature

The following is the project design feature:

### **Open Space Easement and RPO Buffer**

- The drainage and fringe areas onsite meet the criteria of the RPO riparian habitat. Therefore, the project has been designed to place a setback from the western and eastern riparian areas which have been designed as biological open space. The buffer provided adjacent to the riparian areas serves to protect not only the root zones of the riparian trees but allows for greater protection of the adjacent riparian areas and use by largely small mammals and birds.

### Mitigation Measures

The following is a list of project mitigation measures and conditions of approval. As considered by the GPU EIR, Project impacts to riparian habitat or other sensitive natural community would be mitigated through ordinance compliance and through implementation of mitigation measures Bio 1.6, Bio 1.7 and Bio 2.2 through Bio 2.4.

### **Non-Native Grassland Off-Site Mitigation**

- Because 10.92 acres of Non-Native Grassland will be impacted by the Project, the purchase of credits for 5.46 acres of Non-Native Grassland habitat would be required as mitigation for this impact to comply with the 0.5 to 1 compensation ratio for this habitat. The mitigation credit shall be purchased at Tier III or up tier from the Brook Forest Mitigation Bank or another approved mitigation bank subject to the approval of the County.

### **Protection of Preserved Open Space and Riparian Habitat**

- Open Space Fencing and Signage: Since Open Space is designated on each parcel, the boundary between the LBZ and buffer areas will be fenced during and after construction. Temporary fencing will be required along all open space boundaries where clearing or grading is proposed within 100 feet of on- or off-site preserved habitat and where permanent fencing has not been constructed. Permanent fencing or walls are required when open space is proposed within 300 feet of development or when open space is included within residential lots less than 5 acres in size. Permanent fencing will be installed between development and open space and will not be placed between on and off-site contiguous open space. Signage of the Open Space Easement shall also be installed.

As previously discussed, the GPU EIR determined impacts to riparian habitat and other sensitive natural communities as significant and unavoidable. However, the proposed Project would have a less than significant impact with mitigation for purchase of offsite non-native grassland habitat and open space fencing and signage identified in the GPU EIR as Bio 1.6, Bio 1.7, Bio 2.2 and Bio 2.4. 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 has two drainages that have been determined by the Biological Letter Report as jurisdictional waters under the California Fish and Game and Army Corps of Engineers. The project would remove non-native flammable vegetation from the drainages, as required per the Escondido Fire Department. However, the Biological Letter Report also determined that the Regional Water Quality Control Board and the Army Corps of Engineers would not require permits for the Project because there is no fill of State Waters proposed. The project has been designed to include both drainage areas onsite within biological open space easements with appropriate setbacks as described in response 4(b), Project Design Features. In addition, the Project would also be required to mitigate for open space fencing and signage during all ground disturbing activities as well as during operations as also described in

response 4(b), Mitigation Measures. The Project would not result in impacts to any jurisdictional wetlands.

As previously discussed, the GPU EIR determined impacts to federally protected wetlands as less than significant with mitigation. The proposed Project would also have a less than significant impact with mitigation by incorporating biological open space easements, buffers, fencing, and signage identified by the GPU EIR as mitigation measures Bio 1.6, Bio 1.7, Bio 2.2 and Bio 2.4. Therefore, the Project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 4(d) The GPU EIR concluded this impact to be significant and unavoidable. The Project site is surrounded by agricultural and residential use types. Pursuant to the Biological Letter Report, the Project site lacks native habitat aside from the drainages and is therefore unlikely to serve as a regional or local wildlife corridor. The drainages would provide full function during Project operations because no impacts would occur in the drainages. The drainages would be preserved within biological open space easements with appropriate buffers as Project design features and the applicant would be required to provide biological open space fencing and signage as Project mitigation measures. The mitigation measures were identified by the GPU EIR as Bio-1.6, Bio 1.7, Bio 2.2 and Bio 2.4. The Project would not substantially interfere with connectivity between existing or potential blocks of habitat, interfere with any regional wildlife corridors, and would not interfere with or eliminate wildlife nursery sites. However, because the Project site does contain habitat that could support nesting migratory birds or raptors protected under the MBTA and the California Fish and Wildlife Code, the Project is required to implement MBTA Provisions as specified in response 4(a). These provisions were identified as mitigation measures Bio 1.6 and Bio 1.7 in the GPU EIR.

As previously discussed, the GPU EIR determined impacts to wildlife movement corridors as significant and unavoidable. However, the proposed Project would have a less than significant impact with mitigation by incorporating biological open space easements, buffers, fencing and signage identified by the GPU EIR as mitigation measures Bio 1.6, Bio 1.7, Bio 2.2, and Bio 2.4. 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 draft North County Multiple Species Program (MSCP) and outside of the adopted South County MSCP. Therefore, the Project does not require conformance with the Biological Mitigation Ordinance (BMO). The Project is consistent with the County's Guidelines for Determining Significance for Biology and the MBTA with the implementation of Project mitigation described in response 4(a). 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 proposed Project would have a less than significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

**Conclusion**

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

1. No peculiar impacts to the Project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. Feasible mitigation measures contained within the GPU EIR (Bio-1.6, Bio-1.7, Bio-2.2, and Bio-2.4) would be applied to the Project. Those mitigation measures, detailed above, requires the Project applicant to purchase mitigation credit for nonnative grassland, comply with the MBTA, and provide open space signage and fencing from onsite preserved wetlands and buffers.

|  | <b>Significant<br/>Project<br/>Impact</b> | <b>Impact not<br/>identified<br/>by GPU EIR</b> | <b>Substantial<br/>New<br/>Information</b> |
|--|---|---|--|
| <b>5. Cultural Resources – Would the Project:</b>  |   |   |  |
| 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, *Archaeological Inventory and Built Environment Evaluation Report for the 2260 San Pasqual Valley Road Project, San Diego County, California, PDS2017-TM-5620*, was prepared for the Project by Shannon Davis in March 2019.

**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 a County of San Diego approved historian, Shannon Davis, it has been determined that there are one or more historical resources within the project site. These resources include two buildings and a cistern. The historical resources report entitled, *Archaeological Inventory and Built Environmental Evaluation Report for the 2260 San Pasqual Valley Road Project, San Diego County, California, PDS2017-TM-5620*, prepared by Shannon Davis evaluated the significance of the historical resources based on a review of historical records and an architectural evaluation. Based on the results of this study, it has been

determined that the historic resource(s) is not significant pursuant to the State of California Environmental Quality Act (CEQA) Guidelines, Section 15064.5.

As previously discussed, the GPU EIR determined impacts on historic resources to be less than significant with mitigation. As the proposed Project would have a less than significant impact with no required mitigation 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. Based on an analysis of records and a survey of the property by a County of San Diego approved archaeologist, Shelby Castells, it has been determined that the project site does not contain any archaeological resources. The results of the survey are provided in an archaeological survey report entitled, *Archaeological Inventory and Built Environment Evaluation Report for the 2260 San Pasqual Valley Road Project, San Diego County, California, PDS2017-TM-5620*, prepared by Shannon Davis. Due to the sensitivity of the area, an Archaeological Monitoring Program, will be implemented as a project condition during earth disturbing activities.

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

#### Conditions of Approval

The following list includes the Project conditions of approval:

#### **Archaeological Monitoring Program**

- Pre-Construction
  - Pre-construction meeting to be attended by the Project Archaeologist and Kumeyaay and Luiseño Native American monitors to explain the monitoring requirements.
- Construction
  - Monitoring. Both the Project Archaeologist and Kumeyaay and Luiseño Native American monitors are to be onsite during earth disturbing activities. The frequency and location of monitoring of native soils will be determined by the Project Archaeologist in consultation with the Kumeyaay and Luiseño Native American monitors. Monitoring of previously disturbed soils will be determined by the Project Archaeologist in consultation with the Native American monitors.
  - If cultural resources are identified:
    - Both the Project Archaeologist and Kumeyaay and Luiseño Native American monitors have the authority to divert or temporarily halt ground disturbance operations in the area of the discovery.
    - The Project Archaeologist shall contact the County Archaeologist.
    - The Project Archaeologist in consultation with the County Archaeologist and Kumeyaay and Luiseño Native American monitors shall determine the significance of discovered resources.

- Construction activities will be allowed to resume after the County Archaeologist has concurred with the significance evaluation.
    - Isolates and non-significant deposits shall be minimally documented in the field. Should the isolates and non-significant deposits not be collected by the Project Archaeologist, the Kumeyaay and Luiseño Native American monitors may collect the cultural material for transfer to a Tribal curation facility or repatriation program.
    - If cultural resources are determined to be significant, a Research Design and Data Recovery Program shall be prepared by the Project Archaeologist in consultation with the Kumeyaay and Luiseño Native American monitors and approved by the County Archaeologist. The program shall include reasonable efforts to preserve (avoid) unique cultural resources of Sacred Sites; the capping of identified Sacred Sites or unique cultural resources and placement of development over the cap if avoidance is infeasible; and data recovery for non-unique cultural resources. The preferred option is preservation (avoidance).
  - Human Remains.
    - The Property Owner or their representative shall contact the County Coroner and the PDS Staff Archaeologist.
    - Upon identification of human remains, no further disturbance shall occur in the area of the find until the County Coroner has made the necessary findings as to origin. If the human remains are to be taken offsite for evaluation, they shall be accompanied by the Kumeyaay and Luiseño Native American monitors.
    - If the remains are determined to be of Native American origin, the Most Likely Descendant (MLD), as identified by the Native American Heritage Commission (NAHC), shall be contacted by the Property Owner or their representative in order to determine proper treatment and disposition of the remains.
    - The immediate vicinity where the Native American human remains are located is not to be damaged or disturbed by further development activity until consultation with the MLD regarding their recommendations as required by Public Resources Code Section 5097.98 has been conducted.
    - Public Resources Code §5097.98, CEQA §15064.5 and Health & Safety Code §7050.5 shall be followed in the event that human remains are discovered.
  - Rough Grading
    - Upon completion of Rough Grading, a monitoring report shall be prepared identifying whether resources were encountered.
- Final Grading
  - A final report shall be prepared substantiating that earth-disturbing activities are completed and whether cultural resources were encountered.
  - Cultural Material Conveyance.
    - The final report shall include evidence that all prehistoric materials have been repatriated to a tribe of appropriate cultural affinity; or that they have been curated at a San Diego curation facility or Tribal curation facility that meets federal standards per 36 CFR Part 79.
    - The final report shall include evidence that all historic materials have been curated at a San Diego curation facility that meets federal standards per 36 CFR Part 79.

Native American consultation was initiated with 12 tribes (Barona, Campo, Jamul, Kwaaymii, Pala Pechanga, Rincon San Luis Rey, Santa Ysabel, Soboba, Sycuan and Viejas) on

September 25, 2017. San Pasqual was noticed of the project on January 30, 2020. Eight tribes (Barona, Jamul, Pala, Rincon, San Luis Rey, San Pasqual, Santa Ysabel, and Viejas) responded to the tribal outreach.

Consultation has been concluded with Barona, Jamul, Pala, Rincon, San Luis Rey, Santa Ysabel, and Viejas. During consultation, the tribes requested that the project be conditioned with an archaeological monitoring program that includes a Native American monitor. Requirements of the monitoring program is provided above.

As previously discussed, the GPU EIR determined impacts to archaeological resources as less than significant with mitigation. However, the Project would have a less than significant impact to historic resources with the incorporation of Project conditions for grading monitoring, identified as GPU EIR mitigation measure Cul-2.5. 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.

- 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 not located on geological formations that potentially contain unique paleontological resources. As such, a paleontological monitoring program is not required.

As considered by the GPU EIR, potential impacts to paleontological resources will be mitigated through ordinance compliance and conformance with the County's Paleontological Resource Guidelines if resources are encountered. The GPU EIR identified these mitigation measures as Cul-3.1.

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 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(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-2.5) would be applied to the Project. This mitigation measure, detailed above, requires the Project to implement monitoring during grading with a County-approved archaeologist and a Native American observer and requires conformance with the County’s Cultural Resource Guidelines if resources are encountered.

| <b>Significant<br/>Project<br/>Impact</b> | <b>Impact not<br/>identified<br/>by GPU EIR</b> | <b>Substantial<br/>New<br/>Information</b> |
|---|---|--|
|---|---|--|

**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 GHGs, 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 proposed 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 21,500 cubic yards of even cut and fill. 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 semi-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 less than 200 ADT and would not result in wasteful, inefficient or unnecessary petroleum usage throughout Project Operations.

Over the lifetime of the proposed 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 proposed Project would use electricity for street lighting and for appliances and lighting. In addition, the proposed residential use would result in natural gas energy use for building heating, water heating and appliances. As previously stated, the proposed 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 proposed 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 proposed 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 tankless gas or electric water heaters 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 proposed Project would implement energy reduction design features and comply with the most recent energy building standards consistent with applicable plans and policies. Therefore, the proposed Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

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

## **Conclusion**

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

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

**7. Geology and Soils – Would the Project:**

|   | <b>Significant Project Impact</b> | <b>Impact not identified by GPU EIR</b> | <b>Substantial New Information</b> |
|---|-----------------------------------|---|------------------------------------|
| 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**

The following studies have been prepared for the proposed project:

- A Preliminary Geotechnical Evaluation prepared by Lundstrom Engineering and Surveying Inc., dated July 27, 2016.
- A Feasibility Study and Preliminary Design Recommendations for Onsite Wastewater Treatment (Percolation Study) prepared by Advanced Geotechnical Solutions, Inc., dated July 28, 2016.

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.

According to the Preliminary Geotechnical Evaluation, 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 the Newport-Inglewood-Rose Canyon fault zone which is approximately 18 miles southwest of the project site. Accordingly, the potential for fault surface rupture on the subject site is very low. 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 Preliminary Geotechnical Evaluation concluded that the potential for liquefaction at the site is very low due to the site characteristics of the underlying hard granitic rock, the lack of shallow groundwater, and the dense compacted fill that would be placed during grading. 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, as discuss in the Preliminary Geotechnical Evaluation, during field explorations, no evidence of landslide potential at the site was observed. In addition, no geomorphic features indicative of landslides were noted during review of aerial photos and published geologic maps. The Preliminary Geotechnical Evaluation further states that the granitic rock at the site is not usually susceptible to seismically induced land sliding. Therefore, the potential for landslides to impact the proposed development was considered to be low.

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 proposed 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 alfisols (FaE2 and RaC), that have a soil erodibility rating of severe. 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 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 Preliminary Geotechnical Evaluation concluded the potential for landslides to impact the proposed development to be low. This conclusion was based on the review of aerial photos and geologic maps and the site characteristics of granitic rock.

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, the Preliminary Geotechnical Evaluation also concluded the potential for liquefaction to impact the proposed development to be very low. This conclusion was based on the site characteristics of the underlying hard granitic rock, the lack of shallow groundwater, and the dense compacted fill that would be placed during grading.

The Preliminary Geotechnical Investigation concluded subsidence and ground fissuring at the site to be very low. This conclusion was based on the presence of the hard-underlying granitic rock and the proposed compacted fill that would be placed during rating activities.

Collapse may be caused by unstable geological structures or conditions. The Preliminary Geotechnical Investigation concluded the potential for collapse to be low due to the dense granitic rock below the site and the fact that the topsoil, colluvium, and undocumented artificial fill will be removed.

As previously discussed, the GPU EIR determined impacts from soil stability to be less than significant. As the proposed Project would have a less than significant impact 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. The Preliminary Geotechnical Investigation concluded the expansion potential onsite to be "low" to "medium". This conclusion was based on soil testing in general accordance with ASTM D 4829. Post-grading testing was recommended to define as-graded expansive soil characteristics to govern design of foundations and street pavement sections. As previously stated, 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 proposed Project would have a less than significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 7(e) The GPU EIR concluded this impact to be less than significant. A Feasibility Study and Preliminary Design Recommendations for Onsite Wastewater Treatment (Percolation Study) has been prepared for the Project and approved by the County of San Diego, Department of Environmental Health (DEH). The Project site would rely on individual wastewater treatment systems, Integrating septic and shallow leach lines for the 14 residential lots. The potable water source will be provided by the City of Escondido Water Division.

As discussed in the Percolation Study, the area required for each lot would range from approximately 7,800 to 13,000 square feet and would be located in areas of gently sloping terrain with grades less than 25 percent. Within these areas, percolation testing was conducted in accordance with the San Diego County Design Manual for Onsite Wastewater Treatment Systems. Based on the preliminary percolation rates, the systems for all lots can be designed with a 100 percent reserve area and there was no evidence from site testing that would preclude use of the onsite wastewater treatment systems. In addition, specific site designs for the wastewater treatment systems would be required to be designed to the satisfaction of the DEH as a standard processing requirement prior to ground disturbance. As such, the Project would not place septic tanks or alternative wastewater disposal systems on soils incapable of adequately supporting the tanks or system.

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

**Conclusion**

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

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

**8. Greenhouse Gas Emissions – Would the Project:**

|   | <b>Significant<br/>Project<br/>Impact</b> | <b>Impact not<br/>identified<br/>by GPU EIR</b> | <b>Substantial<br/>New<br/>Information</b> |
|---|---|---|--|
| 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?

**Analysis**

8(a) The GPU EIR concluded this impact to be less than significant with mitigation. The Project would subdivide the 18.2-acre lot into 14 single-family residential lots. The project is consistent with the General Plan, including Table LU-2, Density Formula for Slope-Dependent Lands as evaluated in the GPU EIR. Because the project has a Land Use Designation of Semi-Rural (SR-1) and contains slopes of less than 25 percent on a majority of the site, density was calculated via the summation of the following: 1 dwelling unit per gross acre with less than a 25% maximum slope (17.35 ac.); 1 dwelling unit per 2 gross acres between a 25% and 50% maximum slope (0.85 ac). Maximum allowable density for the project site pursuant to Table LU-2 is 17 dwelling units, and the project proposes 14 single-family residential lots. Therefore, the Project is consistent with the density allocated by the General Plan and as evaluated in the GPU EIR.

The Project would produce GHG emissions through construction activities, vehicle trips, use of the residential buildings, and other associated uses. 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. 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 proposed project.

The Project proposes the development of 14 single-family residential lots 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 MT CO2e per year, and therefore would be a less-than cumulatively considerable impact. This assumes that the project does not involve unusually extensive construction and does not involve operational characteristics that would generate unusually high GHG emissions.

The proposed 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:

- Coordination with the regional or local water agency to determine if incentives/rebates are available for the purchase and installation of rain barrels.
- Increased new tree plantings throughout the neighborhood by planting two trees per dwelling unit
- Installation of low flow indoor water fixtures in all residential units
- Compliance with County's Water Conservation in Landscaping Ordinance and demonstrate a 40% reduction in outdoor use.
- Compliance with CALGreen Standards and compliance with AB 341 to achieve 75% waste diversion, and construction and demolition waste diversion requirements of 90 percent of inert and 70 percent of all other materials.

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.

Additionally, the Project would install frontage improvements along San Pasqual Valley Road consistent with County General Plan Policy LU-5.5 to ensure that development projects do not impede bicycle and pedestrian access for alternatives to motorized travel.

Thus, 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 proposed Project would have a less-than-significant impact



for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

**Conclusion**

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

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

| <b>Significant<br/>Project<br/>Impact</b> | <b>Impact not<br/>identified<br/>by GPU EIR</b> | <b>Substantial<br/>New<br/>Information</b> |
|---|---|--|
|---|---|--|

**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"/> |
|--------------------------|--------------------------|--------------------------|

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

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

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

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

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"/> |
|--------------------------|--------------------------|--------------------------|

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

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

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

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

**Discussion**

The following studies have been prepared for the proposed project:

- Phase I Environmental Site Assessment prepared by SCST, Inc., dated March 30, 2018.
- Phase II Environmental Site Assessment prepared by SCST, Inc., dated August 5, 2018.
- Fire Protection Plan prepared by FIREWEISE, dated September 30, 2019.

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. In addition, the Project would not demolish any existing structures onsite and therefore would not create a hazard related to the release of asbestos, lead based paint, or other hazardous materials from demolition activities.

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 proposed Project would have a less than significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

9(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: Palomar Driving School (0.3 miles northeast), Escondido Christian School (1.25 miles northwest), and Juniper Elementary School (1.6 miles west).

As discussed in response 9(a), the Project would not store, transport, emission or disposal of hazardous substances. However, a Phase I and a Phase II Environmental Site Assessment (ESA) has been prepared for the Project site which has identified a leaking underground fuel storage tank and a history of agricultural use. As part of the Phase II ESA, eight composite soil samples for agricultural chemical residue and four discrete soil samples for total petroleum hydrocarbons were analyzed. The Phase II ESA determined that the onsite hazardous concentrations of chemicals was very low and no further investigation was required. However,

the report did determine that total petroleum hydrocarbons associated with the underground storage tank could be encountered during mass grading activities and should be managed in accordance with applicable regulations. The Project would be required to remove the underground storage tank, and conduct soil testing and remediation.

Conditions of Approval

The following list includes the Project conditions of approval:

**Storage Tank Removal, Soil Testing and Remediation**

- In order to comply with the County of San Diego Hazardous Materials and Existing Contamination Guidelines for Determining Significance, and to follow the recommendation identified in the Phase II ESA, any above ground or below ground storage tanks, or contaminated soils discovered on the project site must be removed, tested and remediated. Any remediation that is to occur must be completed under the supervision of the Department of Environmental Health.

Although the schools are in close proximity to the Project site; the Project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of the schools. The Project is required to comply with applicable regulations pertaining to hazardous waste to ensure that impacts related to hazardous emissions and schools is less than significant.

As previously discussed, the GPU EIR determined impacts from hazards to schools to be less than significant. This conclusion was based on required compliance with applicable federal, state, and local regulations to hazardous materials. The Project would have a less than significant impact with the incorporation of Project conditions of approval stated above, which is required per Title 23 of the California Code of Regulations, Underground Storage Tanks, a State regulation. 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(c) The GPU EIR concluded this impact to be less than significant. The Phase I ESA reviewed known electronic database listings for possible hazardous waste generating establishments in the vicinity and the project site. This information was obtained from ERS, an environmental information/database retrieval service. The subject property was listed on the databases reviewed as having environmental concerns:

- Howard Johnson, HB Johnson – 2260 San Pasqual Valley Road (proposed Project site): this facility is listed as storing/using hazardous materials and as having underground fuel storage tank onsite.

As discussed in response 9(b), the Project has been conditioned for removal of the underground storage tank, soil testing and remediation. Additionally, the Project does not propose structures for human occupancy or significant linear excavation within 1,000 feet of an open, abandoned, or closed landfill, is not located on or within 250 feet of the boundary of a parcel identified as containing burn ash (from the historic burning of trash), and is not on or within 1,000 feet of a Formerly Used Defense Site. 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 proposed Project would have a less than significant impact for the reasons detailed above, the Project would be consistent with the analysis

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

- 9(d) The GPU EIR concluded this impact to be less than significant with mitigation. The proposed Project is not located within an airport land use plan, Airport Safety Zone, Avigation Easement, Overflight area, within a Federal Aviation Administration Height Notification Surface Area or within two miles of a public airport. In addition, the Project is not located within an Airport Safety Zone, within an Avigation Easement, an Overflight area. Therefore, the project would not result in a safety hazard for people residing or working in the project area.

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

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

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

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

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

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

The Project is not located along the coastal zone.

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

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

- 9f)(v) DAM EVACUATION PLAN:

The Project 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 proposed Project is located on an 18.2-acre site on San Pasqual Valley Road in a very high fire hazard severity

zone. 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 and water supply, specified in the Consolidated Fire Code, as described in the Fire Protection Plan prepared for the Project by Firewise 2000, Inc., dated September 30, 2019. However, the conceptual Fuel Modification Zone Map for the project indicates that not all of the lots can provide the required 100 feet of fuel modification. The restrictive provisions of the open space easement to protect oak woodland habitat on the property do not allow any brush clearing for fuel modification. However, all lots would provide at least 80 feet of fuel modification to the property line and the entire lot would be dedicated as a Zone 1 fuel modification area with irrigated landscape and/or hardscape surface. Pursuant to the Escondido Fire Department, the Project would provide adequate defensible space.

Lastly, according to the Fire Protection Plans and Fire Service Availability Letter submitted for the Project, the Project would meet the required travel response times per the County of San Diego General Plan Safety Element. The closest fire station is Fire Station 4 of the Escondido Fire Department located 4.1 miles from the Project site. The estimated travel time is 7.45 minutes which meets the required travel response time of 10 minutes.

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

- 9(h) The GPU EIR concluded this impact as less than significant. The Project does not involve or support uses that 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 proposed project would have a less than significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

### **Conclusion**

With regards to the issue area of 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.

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

- i) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map, including County Floodplain Maps?
- j) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?
- k) Expose people or structures to a significant risk of loss, injury or death involving flooding?
- l) Expose people or structures to a significant risk of loss, injury or death involving flooding as a result of the failure of a levee or dam?
- m) Inundation by seiche, tsunami, or mudflow?

**Discussion**

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

- (1) A Priority Development Project (PDP) Storm Water Quality Management Plan (SWQMP) dated May 21, 2020, prepared by Lundstrom Engineering and Surveying, Inc.
- (2) A Drainage Study dated April 7, 2020 and prepared by Lundstrom Engineering and Surveying, Inc.

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

- 10(b) The GPU EIR concluded this impact to be significant and unavoidable. The Project lies in the Bear hydrologic subarea, of the Hodges area, within the San Dieguito hydrologic unit. According to the Clean Water Act Section 303(d) list, a portion of this watershed is impaired. Constituents of concern in the San Dieguito watershed include benthic community effects, indicator bacteria, 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 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, Project would have a less than significant impact with mitigation (Hyd-1.2 through 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 proposed Project would have a less-than significant impact with mitigation to water quality standards and requirements and groundwater supplies and recharge (Hyd-1.2 through Hyd-1.5). Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 10(d) The GPU EIR concluded this impact to be significant and unavoidable. The Project would obtain its water supply from the City of Escondido that 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. However, the proposed Project would have a less than significant impact with mitigation to water quality standards and requirements and groundwater supplies and recharge (Hyd-1.2 through Hyd-1.5). Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 10(e) The GPU EIR concluded this impact to be less than significant with mitigation. The site is bounded to the south by San Pasqual Valley Road, to the west by a southwesterly trending drainage channel, and to the north and east by existing single-family residential properties. In general, the site exhibits moderately sloping topography toward the south and west, with a hill in the central portion of the site. Approximately elevations within the overall site limits range from a low elevation of 655 (msl) to the southwesterly boundary to a high of 770 msl near the northeasterly boundary. Runoff generated onsite is conveyed naturally via overland flow to an existing drainage channel. The natural drainage channel flows in a southwesterly direction along the westerly property line. Runoff generated from the site is then conveyed downstream toward Lake Hodges through a series of drainage channels and public storm drains under existing conditions.

Pursuant to the Drainage Study, the proposed Project would alter onsite drainage to direct runoff away from future structures on the site and convey onsite runoff through storm drain systems to appropriate outfalls. 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. 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 proposed Project would have a less than significant impact to erosion or siltation with mitigation (Hyd-1.2 through Hyd-1.5) and is consistent with GPU EIR mitigation measures Hyd-3.1 through 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 Drainage Study determined that the Project would not alter the existing drainage pattern in a manner

which would result in flooding on- or off-site. The Drainage study performed existing and proposed condition analyses which illustrated that there is an increase in the amount of runoff generated from the proposed condition. In order to ensure the additional runoff generated would not alter the rates downstream, bioretention basins are proposed to capture the peak runoff rates from the project site to match existing runoff rates downstream. The basins would be adequately sized to attenuate post-Project peak flow rates in the event of a 100-year storm event. Lastly, the proposed project would not place housing or structures within a floodway, floodplain, or 100-year flood area.

As previously discussed, the GPU EIR determined impacts to flooding as less than significant with mitigation. The proposed Project would have a less than significant for the reasons detailed above and is consistent with GPU EIR mitigation measure Hyd-6.1 for compliance with the Resource Protection Ordinance (RPO). Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 10(g) The GPU EIR concluded this impact to be less than significant with mitigation. Pursuant to the Drainage Study prepared by Project Design Consultants and dated July 31, 2019, the proposed Project would detain stormwater onsite and would not increase peak flows due to the proposed bioretention basins. The basins would capture the peak runoff rates from the project site to match existing runoff rates downstream. Therefore, the Project would not contribute runoff water that would exceed the capacity of existing or planned storm water drainage systems.

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

- 10(h) The GPU EIR concluded this impact to be significant and unavoidable. The Project has the potential to generate pollutants; 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. In addition, septic layout designs have been reviewed and incorporated per GPU EIR Mitigation Measure Hyd-1.9 as a Project design feature.

As previously discussed, the GPU EIR determine impacts to water quality standards and requirements as significant and unavoidable. However, the proposed Project would have a less than significant impact to water quality standards with the implementation of GPU EIR mitigation measures Hyd-1.2 through Hyd-1.5 and Hyd-1.9. 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 Drainage 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 proposed Project would have a less than significant for the reasons detailed above and is consistent with GPU EIR mitigation measure Hyd-6.1. 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. As previously discussed, the GPU EIR determined impacts from impeding or redirecting flood flows as less than significant with mitigation. The proposed Project would have a less than significant for the reasons detailed above and is consistent with GPU EIR mitigation measure Hyd-6.1. 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, no impacts would occur due to 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 proposed Project would have a less-than-significant impact for the reasons detailed above and is consistent with GPU EIR mitigation measure Hyd-6.1. 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 and is consistent with GPU EIR mitigation measures Hyd-8.2. 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 6(a)(iv).

As previously discussed, the GPU EIR determined impacts from seiche, tsunami and mudflow hazards to be less than significant with mitigation. However, the proposed Project would have a less than significant impact for the reasons detailed above and is consistent with GPU EIR

mitigation measures Hyd-3.1 through Hyd-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.

**Conclusion**

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

1. No peculiar impacts to the project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. Feasible mitigation measures contained within the GPU EIR (Hyd-1.2 through Hyd-1.5, Hyd-1.9, Hyd-3.1 through Hyd-3.3, Hyd-6.1 and Hyd-8.2) would be applied to the Project. The mitigation measures, as detailed above, requires the Project applicant to comply with the Guidelines for Determining Significance for Hydrology, Water Quality as well as for Dam Inundation, the Watershed Protection Ordinance, Stormwater Standards Manual, Resource Protection Ordinance, and Grading Ordinance.

|   |   |  |
|---|---|--|
| <b>Significant<br/>Project<br/>Impact</b> | <b>Impact not<br/>identified<br/>by GPU EIR</b> | <b>Substantial<br/>New<br/>Information</b> |
|---|---|--|

**11. Land Use and Planning – Would the Project:**

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

**Discussion**

11(a) The GPU EIR concluded this impact to be less than significant with mitigation. The Project does not propose the introduction of new infrastructure including public roads, water and wastewater pipeline extensions, and utilities to the area. The project is consistent with the surrounding use types of semi-rural residential lots. Moreover, the Project is consistent with the allowed density per the County of San Diego General Plan and was therefore anticipated in the GPU.

As previously discussed, the GPU EIR determined impacts from physically dividing an established community as less than significant with mitigation. However, the proposed Project would have a less than significant impact for the reasons detailed above. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

11(b) The GPU EIR concluded this impact to be less than significant. The Project site is zoned Limited Agriculture (A70), with a minimum lot size of 1 acre, and has a General Plan designator of

Semi-Rural Residential (SR-1), also allowing for 1 single-family dwelling per acre. The Project would subdivide an 18.2-acre site into 14 lots, which is consistent with the development density established by the General Plan and the certified GPU EIR. In addition, the A70 zone allows for single-family residences by-right.

As previously discussed in the description of the project, discretionary actions, and within Agriculture/Forestry Resources response 2(b), the Project would also require a rezone to remove the Agricultural Preserve "A" Special Area Designator from the zone box and an Administrative Permit to remove the parcel from the Agricultural preserve.

The Project site was previously under a Contract, but a notice of nonrenewal was filed in 1984, effectively terminating the Contract January 1, 1995. As previously stated, the site is however still currently under a County Agricultural Preserve. The Williamson Act empowers any city or county having a general plan to establish, by resolution after a noticed public hearing, Agricultural Preserves consisting of lands devoted to agricultural uses and related compatible uses. In the County of San Diego, Board Policy I-38 (Policy) enacts policies for the implementation of the Williamson Act. It also designates properties in the County that are subject to a Williamson Act Contract or Agricultural Preserve, a Special Area Designator for Agricultural Preserve "A", through the County Zoning Ordinance. Through the Policy and the Zoning Ordinance, preserves are established for the purpose of defining the boundaries of those areas within the County which will be willing to enter into contracts pursuant to the act. Because the previous Contract for the site has been terminated and the site is not in active agricultural production, a rezone to remove the "A" Special Area Designator and an Administrative Permit to removal the parcel from the Agricultural Preserve is proposed for consistency with Board Policy I-38. The aforementioned actions would ensure the Project site is consistent with the Zoning Ordinance and Board Policy I-38. Therefore, the Project would not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the Project adopted for the purposes of avoiding or mitigating an environmental effect.

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.

|  | <b>Significant<br/>Project<br/>Impact</b> | <b>Impact not<br/>identified<br/>by GPU EIR</b> | <b>Substantial<br/>New<br/>Information</b> |
|--|---|---|--|
|--|---|---|--|

**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"/> |
|--------------------------|--------------------------|--------------------------|

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"/> |
|--------------------------|--------------------------|--------------------------|

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 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 proposed Project would have a less than significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

12(b) The GPU EIR concluded this impact to be significant and unavoidable. The Project site is not located in 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 of locally important mineral resource recover (extraction) site delineated on a local general plan, specific plan, or other land use plan 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 proposed Project would have a less than significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

**Conclusion**

With regards to the issue area of 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.

|   | <b>Significant<br/>Project<br/>Impact</b> | <b>Impact not<br/>identified<br/>by GPU EIR</b> | <b>Substantial<br/>New<br/>Information</b> |
|---|---|---|--|
| <b>13. Noise – Would the Project:</b>   |   |   |  |
| 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**

The following study has been prepared for the proposed project:

- A Noise Assessment prepared by Ldn Consulting, dated March 21, 2019.

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

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.

A Noise Assessment was prepared by Ldn Consulting dated March 21, 2019 (Noise Assessment) which analyzed all noise impacts from the proposed Project. The Noise Assessment identified Lots 2, 3, 4, 12, 13, and 14 to have a potential significant noise impact exceeding 60 dBA CNEL as they are within the direct line of sight to the San Pasqual Valley Road. Based on the noise report, the noise levels from the San Pasqual Valley Road would be sufficiently attenuated to conform with the noise standards with the incorporation of a ten-foot noise barrier along the southern area of Lots 2, 13 and 14, as shown in the Noise Assessment. The noise barrier has been incorporated within the Project as a design feature. In addition, the Project would be required to place a noise protection easement on lots 2, 13, and 14 as a condition of approval to ensure interior noise levels would comply with the 45 dBA threshold.

### Mitigation Measures

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

#### **Noise Restriction Easement**

- A Noise Restriction Easement shall be placed over the entire areas of lots 2, 13, and 14, as indicated within the Noise Assessment. A County-approved Acoustical Consultant shall perform an acoustical analysis for lots 12, 13 and 14 to ensure the lots would conform to the allowable sound level limits of the General Plan for interior and exterior noise levels.

#### **Noise Barrier**

- The applicant shall install the permanent 10-foot noise barrier as recommended in the acoustic analysis along the southern edge of parcels 2, 13, and 14.

With the incorporation of the aforementioned mitigation measures, the Project would comply with the General Plan Noise Element.

### Noise Ordinance

The Project would comply with the Noise Ordinance Section 36-404 for non-transportation noise generated by the project. The Project site and surrounding properties are zoned A70 that have a required one-hour average sound limit of 50 dBA daytime and 45 dBA nighttime. The project is for the subdivision of 14 residential lots and would not exceed the standards of the Noise Ordinance at or beyond the project's property line. The Project would not involve any noise producing equipment that would exceed applicable noise levels at the adjoining property line.

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.

### 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 Element.

As previously discussed, the GPU EIR determined impacts from excessive noise levels to be less than significant with mitigation. The proposed Project would also have a less than significant impact with the incorporation of mitigation measures. The aforementioned mitigation measures were identified within the GPU EIR as Mitigation Measures Noi-1.1, Noi-1.2 and Noi-1.4. Therefore, the proposed Project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 13(b) The GPU EIR concluded this impact to be less than significant with mitigation. The proposed Project is for the subdivision of 14 residential lots which are sensitive receptors to low ambient vibration. Although the Project site would be within 600 feet from a public road or transit right-of-way with projected noise contours of 65 db or more, the Noise Assessment concluded the Project would not be exposed to excessive groundborne vibration or groundborne noise levels. This conclusion was based on the noise measurements and modeling conducted as part of the Noise Assessment.

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 Project mitigation measures and conditions of approval. Refer to response 12(a) for a list of the aforementioned mitigation measures and conditions of approval. Also, the Project is not expected to expose existing or planned noise sensitive areas to noise 10 dB CNEL over existing ambient noise levels. An Acoustical Report prepared by Ldn Consulting dated March 21, 2019 included an evaluation of the direct and cumulative impacts for this project. Based on the report, the project has demonstrated to not have any direct or cumulative impacts the existing surrounding area. The project does not create a direct impact of more than 3 dBA CNEL on any roadway segment and no cumulative noise increase of 3 dBA CNEL or more were found. 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 proposed 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 (ALUCP) for airports or within 2 miles of a public airport or public use airport. Therefore, the Project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

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

## **Conclusion**

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

1. No peculiar impacts to the Project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. Feasible mitigation measures contained within the GPU EIR (Noi-1.1, Noi-1.2 and Noi-1.4) have been incorporated into the Project as conditions of approval. The mitigation measures, as detailed above, requires the Project applicant to comply with the Noise Compatibility Guidelines in County Noise Element and the Guidelines for Determining Significance for Noise.

|  | <b>Significant<br/>Project<br/>Impact</b> | <b>Impact not<br/>identified<br/>by GPU EIR</b> | <b>Substantial<br/>New<br/>Information</b> |
|--|---|---|--|
|--|---|---|--|

**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"/> |
|--------------------------|--------------------------|--------------------------|

b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?

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

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

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

**Discussion**

14(a) The GPU EIR concluded this impact to be less than significant. The Project site is designated in the General Plan as SR-1 and is Zoned A70. Development of the proposed 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 from Schools, Water, and Fire with the availability to serve the 14 proposed residential lots.

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

14(b) The GPU EIR concluded this impact to be less than significant. The Project would not displace any existing housing. Two structures exist onsite and would be retained on lot 1. In addition, the Project would subdivide an 18.2-acre property into 14 residential lots. 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 proposed Project would have a less than significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

14(c) The GPU EIR concluded this impact to be less than significant. As indicated in response 14(b), the Project would not displace any residential structures and would therefore 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 proposed Project would have a less than significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

**Conclusion**

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

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

|   |   |  |
|---|---|--|
| <b>Significant<br/>Project<br/>Impact</b> | <b>Impact not<br/>identified<br/>by GPU EIR</b> | <b>Substantial<br/>New<br/>Information</b> |
|---|---|--|

**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"/> |
|--------------------------|--------------------------|--------------------------|

**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 Water, Fire and two School services. Water service would be provided by the City of Escondido. Fire protection and emergency medical response services would be provided by the Escondido Fire Department with a 7.45-minute travel time. In addition, School Services would be provided by the Escondido Union School district and the Escondido Union High School District.

Based on the Project’s service availability forms, the Project would not result in the need for significantly altered services or facilities. All aforementioned public services have indicated availability to serve the proposed Project site. In addition, wastewater services would be provided by onsite septic and would not rely on any public services.

As previously discussed, the GPU EIR determined impact to fire protection services, police protection services and other public services as significant with mitigation while school services remained significant and unavoidable. However, as the Project would have a less than significant impact for the reasons stated above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

**Conclusion**

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

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

|   |   |  |
|---|---|--|
| <b>Significant<br/>Project<br/>Impact</b> | <b>Impact not<br/>identified<br/>by GPU EIR</b> | <b>Substantial<br/>New<br/>Information</b> |
|---|---|--|

**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"/> |
|--------------------------|--------------------------|--------------------------|

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"/> |
|--------------------------|--------------------------|--------------------------|

**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 18.2-acre property into 14 parcels. 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 proposed Project would have a less than significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

16(b) The GPU EIR concluded this impact to be less than significant with mitigation. The Project does not include recreational facilities or require the construction or expansion of recreational facilities 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 proposed Project would have a less than significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

**Conclusion**

With regards to the issue area of 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.

|   |   |  |
|---|---|--|
| <b>Significant<br/>Project<br/>Impact</b> | <b>Impact not<br/>identified<br/>by GPU EIR</b> | <b>Substantial<br/>New<br/>Information</b> |
|---|---|--|

**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"/> |
|--------------------------|--------------------------|--------------------------|

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

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

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

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

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

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

e) Result in inadequate emergency access?

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

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

**Discussion**

The following study has been prepared for the proposed project:

- Intersection Control Evaluation prepared by Linscott, Law and Greenspan, Engineers, dated June 4, 2019.
- Sight Distance Certification prepared by Lundstrom Engineering and Surveying, Inc., dated August 15, 2017.

17(a) The GPU EIR concluded this impact to be significant and unavoidable. The County of San Diego Guidelines for Determining Significance for Traffic and Transportation (Guidelines) establish measures of effectiveness for the performance of the circulation system. These Guidelines incorporate standards from the County of San Diego Public Road Standards, Mobility Element, Transportation Impact Fee Program and the Congestion Management Program.

The Project would subdivide an 18.2-acre property into 14 residential lots. The Project was calculated to generate 140 Average Daily Trips (ADT) with a total of 11 trips during the AM peak hour (3 inbound/8 outbound trips) and 14 trips during the PM peak hour (10 inbound/ 4 outbound trips). The Project would not have a direct impact related to a conflict with any performance measures which have establishes measures of effectiveness of the circulation system. This is because the Project trips would not exceed any of the County’s Guidelines for Determining Significance for direct impacts related to Traffic and Transportation. The Project would result in less than 200 ADT. As identified in the County’s Guidelines for Determining Significance for Traffic and Transportation, the Project trips would not result in a substantial increase in the number of vehicle trips, volume of capacity ratio on roads, or congestion at intersections in relation to existing conditions. These trips will be distributed on a Caltrans facility and Mobility Element roadways in the County, some of which currently or are projected to operate at inadequate levels of service.

The Project site would obtain its access from San Pasqual Valley Road, which is also a Caltrans facility, SR-78. An Intersection Control Evaluation (ICE) has been prepared for the proposed Project analyzing the SR-78 and Flora Vista Street intersection. The ICE has been approved by Caltrans proposing a minor street stop as the preferred alternative for this intersection. The ICE concluded that with the addition of Project traffic with existing minor-street stop traffic control at this intersection would result in an acceptable LOS C with 17.5 seconds of delay for the southbound left movement and queues of less than one vehicle for the southbound left-turn approach. The overall average delay for the intersection is less than one second, as traffic on the SR-78 is not stopped. Therefore, no significant impacts would occur to the Caltrans facility with the Project Condition of a minor-street control alternative, as approved by Caltrans.

Project Condition of Approval

**Minor Street Stop Control Alternative (existing control)**

- The applicant shall install a minor street stop control that retains the existing intersection traffic control on Flora Vista Street and assumes a stop control on the proposed project access driveway approach, as approved by Caltrans.

With the incorporation of the aforementioned Project Condition of Approval, the Project would not impact a Caltrans facility.

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 TIF program creates a mechanism to proportionally fund improvements to roadways necessary to mitigate potential cumulative impacts caused by traffic from future development. These project trips could potentially contribute to a potential significant cumulative impact and mitigation is required. The potential growth represented by this project was included in the growth projections upon which the TIF program is based.

### Project Mitigation

#### **Payment into the TIF Program**

- The applicant would be required to pay into the County TIF program.

With the incorporation of the aforementioned mitigation measure, the Project would not result in a cumulatively considerable impact to County Mobility Element Roadways.

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 as well as Caltrans facilities with the incorporation of mitigation and Project conditions of approval as detailed above. The conditions and mitigation measure were identified in the GPU EIR as Tra-1.2, Tra-1.4 and Tra-1.7 which require coordination with Caltrans during planning and design, Implementation of the County Guidelines for Determining Significance for Transportation and Traffic, and Implement the County of San Diego TIF Ordinance. 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.

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. Generally, vehicle miles traveled (VMT) is the most appropriate measure of transportation impacts. VMT refers to the amount and distance of automobile travel attributable to a project. Other relevant considerations may include the effects of the project on transit and non-motorized travel. Except as provided regarding roadway capacity, a project's effect on automobile delay shall not constitute a significant environmental impact. The County of San Diego has not adopted a threshold for VMT and is not expected to until July 2020, when the provisions of the section apply statewide. As the VMT threshold does not yet apply, no impact would occur.

The project would not conflict with an applicable congestion management program and would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.



17(c) The GPU EIR concluded this impact to be less than significant with mitigation. The Project site is not located within an Airport Influence Area, Airport Safety Zone, Airport Land Use Compatibility Plan Area, Avigation Easement, or Overflight Area. Therefore, the Project would have a less than significant impact to air traffic patterns. The Project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

17(d) The GPU EIR concluded this impact to be significant and unavoidable. The proposed Project would not substantially alter traffic patterns, roadway design, place incompatible uses (e.g., farm equipment) on existing roadways, or create curves, slopes or walls which would impede adequate sight distance on a road. In addition, the Project prepared a Site Distance Certification prepared by Lundstrom Engineering and Surveying, Inc. for the intersection of San Pasqual Valley Road and the proposed private entry. The Certification indicated that there is a minimum of 550 feet of unobstructed intersectional sight distance from the Project entry and San Pasqual Valley Road measured in accordance with the methodology of the County of San Diego Public Road Standards.

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

17(e) The GPU EIR concluded this impact to be less than significant with mitigation. The Escondido Fire Department 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 is consistent with GPU EIR Mitigation Measure Tra-4.2, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

17(f) The GPU EIR concluded this impact to be less than significant with mitigation. The Project would not result in the construction of any road improvements or new road design features that would interfere with the provision of public transit, bicycle or pedestrian facilities. In addition, the Project does not generate sufficient travel demand to increase demand for transit, pedestrian or bicycle facilities. As the proposed Project would have a less than significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

## **Conclusion**

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

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

- 3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
- 4. Feasible mitigation measures contained within the GPU EIR (Tra-1.2, Tra-1.4, Tra-1.7 and 4.2) would be applied to the Project. The mitigation measures, as detailed above, would require coordination with Caltrans during planning and design, Implementation of the County Guidelines for Determining Significance for Transportation and Traffic, Implement the County of San Diego TIF Ordinance, and implement Building and Fire codes to ensure emergency fire apparatus accessibility.

|  | <b>Significant<br/>Project<br/>Impact</b> | <b>Impact not<br/>identified<br/>by GPU EIR</b> | <b>Substantial<br/>New<br/>Information</b> |
|--|---|---|--|
|--|---|---|--|

**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 on-site wastewater systems (OSWS), also known as septic systems. Discharged wastewater must conform to the Regional Water Quality Control Board’s (RWQCB) applicable standards, including the Regional Basin Plan and the California Water Code. California Water Code Section 13282 allows RWQCBs to authorize a local public agency

to issue permits for OSWS “to ensure that systems are adequately designed, located, sized, spaced, constructed and maintained.” The RWQCBs with jurisdiction over San Diego County have authorized the County of San Diego, Department of Environmental Health (DEH) to issue certain OSWS permits throughout the County and within the incorporated cities. The Project would require DEH approval of the OSWS lay-out for the Project pursuant to DEH, Land and Water Quality Division’s, “On-site Wastewater Systems: Permitting Process and Design Criteria” prior to obtaining a building permit for residential development. 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 proposed Project would have a less than significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 18(b) The GPU EIR concluded this impact to be less than significant with mitigation. The Project would rely on an on-site wastewater treatment system would require DEH approval of the lay-out for the Project pursuant to DEH, Land and Water Quality Division’s, “Onsite Wastewater Systems: Permitting Process and Design Criteria” prior to obtaining a building permit for residential development.

Additionally, Project requires water service from the City of Escondido. A Service Availability Letter from the City of Escondido has been provided, indicating adequate water resources and entitlements are available to serve the requested water resources. Therefore, the Project would have sufficient water supplies available, and would not require the construction of new water or wastewater treatment facilities or expansion of existing facilities to serve the Project.

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

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

- 18(d) The GPU EIR concluded this impact to be significant and unavoidable. A Service Availability Letter from the City of Escondido has been provided which indicates that there is adequate water to serve the Project.

As previously discussed, the GPU EIR determined impacts to adequate water supplies be significant and unavoidable. However, the proposed Project would have a less than significant impact with no required mitigation for the reasons detailed above. Therefore, the Project would

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

- 18(e) The GPU EIR concluded this impact to be less than significant with mitigation. The Project would rely on an on-site wastewater system (septic system); therefore, the Project would not interfere with any wastewater treatment provider’s service capacity.

As previously discussed, the GPU EIR determined impacts to adequate wastewater facilities be less than significant with mitigation. However, the proposed Project would have a less than significant impact 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 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.

|  | <b>Significant<br/>Project<br/>Impact</b> | <b>Impact not<br/>identified<br/>by GPU EIR</b> | <b>Substantial<br/>New<br/>Information</b> |
|--|---|---|--|
| <b>19. Wildfire</b> – If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the Project: |   |   |  |
| a) Substantially impair an adopted emergency response plan or emergency evacuation plan?   | <input type="checkbox"/>                  | <input type="checkbox"/>                        | <input type="checkbox"/>                   |

- b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?
- c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts in the environment?
- d) Expose people or structures to significant risk, including downslopes or downstream flooding or landslides, as a result of runoff, post-fire instability, or drainage changes?

**Discussion**

Wildfire was analyzed 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.

The following studies have been prepared for the proposed project:

- Fire Protection Plan (FPP) prepared by Firewise 2000, Inc., dated September 30, 2019

19(a) The Project is composed of an 18.2-acre lot residential subdivision with access of off San Pasqual Valley Road. The Project site is located within a very high fire hazard severity zone (FHSZ). The Project site would be serviced by the Escondido Fire Department and is located 4.1 miles from nearest fire station. According to the fire service availability letter signed by the Escondido Fire Department, the site would have an emergency response time of 7.45 minutes which meets the General Plan Safety Element standard of 10 minutes. The letter indicated that adequate services exist to serve the proposed Project. In addition, the Project would be required to be consistent with the County Consolidated Fire Code and Building Code. 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 proposed 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(b) The GPU EIR concluded this impact to be significant and unavoidable. As indicated above in response a), the Project is located within a very high fire hazard severity zone (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 Escondido Fire Department. 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, can be described as gently sloping (5-10% gradient), does not contain any significant geological features that would influence wildland fire behavior, and is surrounded by residential development.

The FPP prepared for the Project also conducted a preliminary fuel assessment of the surrounding properties to determine the wildfire risk. To evaluate the on-site conditions, fire behavior modeling has been conducted for the Project through the BehavePlus 5.0.5 Fire Behavior Prediction and Fuel Modeling System. The BehavePlus Fire behavior computer modeling system was developed by USDA-Forest Service research scientists at the Intermountain Forest Fire Laboratory, Missoula, Montana, and is utilized by wildland fire experts nationwide. Using BehavePlus 5.0.5 fire behavior program, it was concluded that due to the maintained surrounding landscape and little or no flammable native vegetation, off-site fuel load is considered "low". The results of the fire behavior assessment with regards to the flame length, indicate that implementation of the 80-foot fuel modification one as described previously in response 9(g), would provide a sufficient barrier as prescribed in the County Code to deter the impacts from wildfire on the structures.

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 and vegetation removal/clearance. Additionally, the County of San Diego Fire Authority has indicated the availability to serve the site in the case that a fire would occur. The nearest fire station is located 4.1 miles 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 proposed 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 proposed Project would require the installation or maintenance of the following associated infrastructure: private roads, fuel breaks, and sewer 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 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 proposed 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 Drainage 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 bioretention 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, landslide potential at the site is considered to be low. The Geotechnical Evaluation concluded no evidence of landslide potential occurred at the site and the underlying granite at the site is not usually susceptible to seismically induced land sliding. In addition, the site is describes as gently sloping with grades of 5-10% and would not develop any steep slopes as discussed in response 19(a). The project would also include defensible space, including an 80-foot FMZ, as approved by the Escondido Fire Department. 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 proposed 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.

### **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 behavior modeling and further analysis provided within the FPPs, with the incorporation of Project design features, impacts associated with wildfire would be less than significant. Therefore, the proposed 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) 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](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:

Beauchamp, Mitchel; Pacific Southwest Biological Services, Inc., (June 3, 2020), Biological Letter Report

Davis, Shannon; ASM Affiliates, Inc., (March 2019), Archaeological Inventory and Built Environment Evaluation Report for the 2260 San Pasqual Valley Road Project

Donovan, John and Derisi, Paul; Advanced Geotechnical Solutions, Inc., (July 27, 2016), Preliminary Geotechnical Investigation

Keating, John; Linscott Law & Greenspan, (June 4, 2019), Intersection Control Evaluation

Louden, Jeremy; Ldn Consulting, Inc. (March 21, 2019), Noise Assessment

Lundstrom, William; Lundstrom Engineering and Surveying, Inc., (April 7, 2020), Drainage Study

Lundstrom, William; Lundstrom Engineering and Surveying, Inc., (July 28, 2016), Feasibility Study and Preliminary Design Recommendation for Onsite Wastewater Treatment

Lundstrom, William; Lundstrom Engineering and Surveying, Inc., (May 21, 2020), Priority Development Project (PDP) SWQMP

Lundstrom, William; Lundstrom Engineering and Surveying, Inc., (August 15, 2017), Sight Distance Certification

Skinner, Douglas; SCST Inc., (March 30, 2018), Phase I Environmental Site Assessment

Skinner, Douglas; SCST Inc., (August 6, 2018), Phase II Environmental Site Assessment

Smyser, Jeff; County of San Diego, (October 3, 2017), Local Agricultural Resource Assessment Model

Woychak, Ronald and Bacon, David; FIREWISE 2000, Inc., (September 30, 2019), 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](http://www.sdcounty.ca.gov/PDS/gpupdate/docs/BOS_Aug2011/EIR/FEIR_5.00_-_References_2011.pdf)

## Appendix B

**A Summary of Determinations and Mitigation within the Final Environmental Impact Report, County of San Diego General Plan Update, SCH # 2002111067 is available on the Planning and Development Services website at:**

[http://www.sdcounty.ca.gov/pds/gpupdate/GPU\\_FEIR\\_Summary\\_15183\\_Reference.pdf](http://www.sdcounty.ca.gov/pds/gpupdate/GPU_FEIR_Summary_15183_Reference.pdf)