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July 30, 2026

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

Project Name: Montiel Road Subdivision
Project Record ID: PDS2022-TM-5648
Environmental Log No. LOG NO. PDS2022-ER-22-08-008
APN(s) 228-171-16-00

Lead Agency Name and Address:

County of San Diego
Planning and Development Services
5510 Overland Avenue, Suite 310
San Diego, CA 92123

County Staff Contact:

Bronwyn Brown, Project Manager
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Project Location:

The proposed project is located at 1434 Montiel Road, Escondido, in the North County Metropolitan Subregional Plan area in the unincorporated County of San Diego. The project site is an approximately 1.98-acre parcel, APN: (228-171-16-00). Thomas Guide Coordinates: Page 1129, Grid F2

Project Applicant:

Joseph Holasek
4990 North Harbor Drive, Suite 201
San Diego, CA 92106
Phone: (619) 507-1001

General Plan

Community Plan:	North County Metropolitan Subregional Plan
Regional Category:	Village
Land Use Designation:	Village Residential (VR-7.3)
Density:	7.3 units per gross acre
Floor Area Ratio (FAR):	N/A

Zoning

Use Regulation:	Single Family Residential (RS)
Animal Regulations:	Q – Various Allowances in accordance with the Animal Schedule
Density:	– N/A
Minimum Lot Size:	6000
Building Type:	C – Residential/Mixed Residential/Nonresidential and Nonresidential Buildings
Setback:	H – 50-foot Front Yard, 10 foot Interior Side, 35 foot Exterior Side Yard, 25 foot Rear Yard (Not including footnotes as defined by the Zoning Ordinance)
Height:	G – 35-feet maximum, 2 stories
Open Space:	– N/A
Special Area Designator:	C – Airport Land Use Compatibility Plan Area

Project Description

Project Description

The proposed project entails the subdivision of a 1.98-acre parcel located at 1434 Montiel Road in the Escondido area of unincorporated San Diego County, within the North County Metropolitan Subregional Plan area, into 10 single-family residential lots through a Tentative Map application. The site was previously developed with a single-family residence, which has since been demolished, and is currently vacant. The property is designated under the General Plan Regional Category Village, with a Land Use Designation of Village Residential (VR-7.3), and is zoned Single Family Residential (RS), which is consistent with the proposed residential development.

Site Access and Roadway Improvements

Access to the site will be provided via a new private cul-de-sac roadway (Street A) extending from Via Teramo, which connects to Montiel Road, an existing public roadway. The internal roadway will serve all proposed residential lots and will be designed to meet County of San Diego and fire access standards, including emergency vehicle access, turning radii, and fire apparatus maneuverability requirements.

The project includes on-site improvements consisting of grading, utility installation, drainage improvements, retaining walls, landscaping, and construction of the private roadway and associated frontage improvements.

Utilities and Off-Site Improvements

The project will be served by public utilities. Potable water and wastewater services will be provided by the Vallecitos Water District. Both water and sewer service will require extension of existing off-site and on-site infrastructure to serve the proposed development, including approximately 200 to 250 linear feet of water main extension and associated utility improvements.

The project will also require annexation into the Vallecitos Water District sewer service area. The sewer-only annexation process will be administered directly through the Vallecitos Water District. The District has indicated that the project will be required to prepare and submit water and sewer studies prior to plan check approval to confirm adequate service capacity.

The project would also dedicate additional public right-of-way and construct new curb and sidewalk along the project's Via Teramo frontage, extending south to the intersection with Montiel Road. Additional frontage improvements include a cross gutter at the proposed private-street entrance and a new curb return at the Via Teramo/Montiel Road intersection.

Fire Protection Services

Fire protection services will be provided through the San Marcos Fire Protection District, with response support from the Escondido Fire Department via an Automatic Aid Agreement. The project is expected to meet the County's five-minute emergency response time standard. Fire protection improvements will include installation of fire hydrants, compliance with fire access requirements, and implementation of fuel modification and defensible space requirements.

Grading and Drainage Improvements

Earthwork associated with the project will consist of approximately 96 cubic yards of cut and 16,019 cubic yards of fill material. The project will implement stormwater quality and drainage improvements in accordance with the County of San Diego Watershed Protection Ordinance and applicable Municipal Separate Storm Sewer System (MS4) permit requirements.

As a Priority Development Project, the design incorporates permanent structural Best Management Practices (BMPs), including a centralized bioretention facility (biofiltration planter) designed to provide water quality treatment and hydromodification management. Existing site drainage generally flows from the northeast toward the southwest, and the proposed development will maintain this drainage pattern through a controlled stormwater conveyance system consisting of graded swales, gutters, and a private storm drain network.

The drainage system is designed to ensure that post-development runoff does not exceed pre-development conditions, thereby minimizing the potential for downstream erosion or flooding. Treated runoff will discharge at the historic drainage outfall location and include a riprap energy dissipator to reduce erosion potential.

Landscaping and Sustainability Features

The project will incorporate landscape improvements consistent with the County of San Diego Water Efficient Landscape Ordinance (WELO) and applicable zoning requirements. Landscaping will include drought-tolerant plant palettes, efficient irrigation systems, and landscaped open space areas designed to enhance visual quality and environmental performance.

The project also incorporates sustainability and energy efficiency measures consistent with the County Climate Action Plan (CAP), including all-electric residential units, electric vehicle charging infrastructure, solar photovoltaic panels on all dwelling units, water-efficient fixtures, and drought-tolerant landscaping.

Discretionary Permits

Discretionary permits required for the project include approval of a Tentative Map and a Grading Permit from the County of San Diego. A Preliminary Grading Plan has been prepared and submitted in support of the Tentative Map application.

Other Permits

Ministerial permits and approvals anticipated for the project include:

- General Construction Stormwater Permit (San Diego Regional Water Quality Control Board [SDRWQCB])
- National Pollutant Discharge Elimination System (NPDES) Permit (SDRWQCB)
- Construction and/or Encroachment Permit (County of San Diego)
- Storm Water Quality Management Plan (SWQMP) and/or Storm Water Pollution Prevention Plan (SWPPP) approvals (County of San Diego)
- Improvement Plan approvals (County of San Diego)
- Landscape Plan approvals (County of San Diego)
- Building Permits (County of San Diego)
- Utility permits and annexation approvals from the Vallecitos Water District which may require action by and/or coordination with the Local Agency Formation Commission (LAFCO)

- Fire Department permits and approvals, including compliance with the Automatic Aid Agreement response standards between the San Marcos Fire Protection District and Escondido Fire Department

Overview of 15183 Checklist

California Public Resources Code §21083.3 and California Environmental Quality Act (CEQA) Guidelines §15183 provide an exemption from additional environmental review for projects that are consistent with the development density established by existing zoning, community plan, or general plan policies for which an Environmental Impact Report (EIR) was certified, except as might be necessary to examine whether there are project-specific significant effects which are peculiar to the project or its site. CEQA Guidelines §15183 specifies that examination of environmental effects shall be limited to those effects that: (1) are peculiar to the project or the parcel on which the project would be located, and were not analyzed as significant effects in a prior EIR on the zoning action, general plan, or community plan, with which the project is consistent; (2) are potentially significant off-site impacts and cumulative impacts which were not discussed in the prior EIR prepared for the general plan, community plan, or zoning action; or (3) are previously identified significant effects which, as a result of substantial new information which was not known at the time the EIR was certified, are determined to have a more severe adverse impact than discussed in the prior EIR. CEQA Guidelines §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 proposed 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 Environmental Checklist. This evaluation concludes that the project qualifies for an conformance with CEQA in accordance with §15183 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.

The project qualifies for conformance with CEQA in accordance with CEQA Guidelines §15183 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 divide a 1.98-acre parcel into 10 single-family residential lots, which is consistent with RS zone, the VR-7.3 development density established by the GPU and the certified GPU EIR.

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

The subject property is no different than other properties in the surrounding area, and there are no Project-specific effects which are peculiar to the Project or its site. The Project site is located in an area developed with similarly sized 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, and Cultural Resources. However, applicable mitigation measures and project design features related to Cultural Resources as specified within the GPU EIR have been made conditions of approval for this project. Additionally, project design features consistent with recent State regulations as well as consistency with applicable ordinances, CEQA guidelines for determining significance, and Board Policies that were identified as mitigation measures within the GPU EIR associated with Transportation/Traffic, Air Quality, Greenhouse Gas Emissions, Noise, Wildfire, Hydrology/Water Quality, Public Services, and Land Use and Planning 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 would not require a zone change or general plan amendment. The Project is consistent with the density and use characteristics of the development considered by the GPU EIR. The GPU EIR considered the incremental impacts of the Project, and as explained further in the Section 15183 Exemption Checklist below, no potentially significant off-site or cumulative impacts have been identified which were not previously evaluated.

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

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

Signature	Date, July 30, 2026
	Date
Bronwyn Brown	Project Manager
Printed Name	Title

CEQA Guidelines §15183 Environmental Checklist

Overview

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

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

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

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

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

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

Discussion

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

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

As described in the General Plan Update 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.

Approximately 37 Resource Conservation Areas (RCAs) have been identified by the County in the North County Metropolitan Subregional Plan. The 37 RCAs are primarily biological resources. The closest RCA to the project site is Mount Whitney Double Peak and is located 2.3 miles south-west of the project site, which would not afford any views of the Project site due to distance and intervening topography and land uses. In addition, the Project also includes a landscaping plan which would help further screen the Project site. Impacts would be less than significant.

- 1(b) The GPU EIR concluded this impact to be less than significant with mitigation. State scenic highways refer to those highways that are officially designated by the California Department of Transportation (Caltrans) as scenic (Caltrans - California Scenic Highway Program). Generally, the area defined within a State Scenic Highway is the land adjacent

to and visible from the vehicular right-of-way. The dimension of a scenic highway is usually identified using a motorist's line of vision, but a reasonable boundary is selected when the view extends to the distant horizon. The scenic highway corridor extends to the visual limits of the landscape abutting the scenic highway.

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Further, the County General Plan identifies roadways that are designated as County Scenic Corridors within the Conservation and Open Space Element and have been included as part of the County Scenic Highway System. The nearest designated County Scenic Corridors include Harmony Grove Road, approximately 2.3 miles southwest of the project site. This corridor has no direct or partial views of the project site due to the distance to the site and intervening topography; therefore, implementation of the proposed project would not substantially damage scenic resources within a County Scenic Corridor.

As previously discussed, the GPU EIR determined impacts on scenic resources to be less than significant with mitigation. As the project would have a less-than-significant impact for the reasons detailed above, the project would be consistent with the analysis within the GPU EIR because it would not create new impacts, increase impacts, or result in peculiar impacts, and there is no new information of substantial importance than identified within the GPU EIR. No mitigation measures are required to be carried forward.

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

The project would be consistent with existing visual character of the project site and views within the community. The proposed project consists of the subdivision of a residentially

zoned parcel into a 10 residential lots and will not substantially alter landform steep slopes. Refer to response 1(a) and 1(b) for additional discussions regarding impacts to the existing visual character of the project site and vicinity. The project as designed will not substantially degrade the existing visual character or quality of the site and its surroundings.

The Project site is within a village area of unincorporated County, located north of the intersection of State Route 78 and Interstate 15. The existing visual character and quality of the Project surroundings are characterized as village single-family residential land use types with relatively flat to increasingly sloped grades. The proposed Project would not detract from, or contrast with the existing visual character and/or quality of the surrounding areas for the following reasons: consistency with the General Plan density allowance on-site, conformance with the North County Metro Subregional Plan and location of the site within a residentially developed area. Additionally, the location, size, and design of the proposed use would be compatible with uses in the immediate area. The proposed development is similar to surrounding single-family residential use types.

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. Commercial lighting would be required to conform with the County's Light Pollution Code to prevent spillover onto adjacent properties and minimize impacts to dark skies. The proposed Project would use outdoor lighting and is located within Zone B as identified by the San Diego County Light Pollution Code, approximately 64 miles from the Mount Laguna Observatory and approximately 33 miles from Palomar Observatory. However, the Project would not adversely affect nighttime views or astronomical observations, because the Project would conform to the Light Pollution Code (Section 51.201-51.209), including the Zone B lamp type and shielding requirements per fixture and hours of operation limitations for outdoor lighting and searchlights. The code was developed by the County in cooperation with the lighting engineers, astronomers, and other experts to effectively address and minimize the impact of new sources light pollution on nighttime views. Compliance with the Code would be required prior to issuance of a building permit. Thus, the proposed Project would not create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area.

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

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

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

☐☐☐

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

☐☐☐

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

☐☐☐

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

☐☐☐

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

☐☐☐

Discussion

2(a) The GPU EIR concluded this impact to be significant and unavoidable. Based on the County of San Diego Geographical Information System (GIS) and aerial imagery, the site is not designated as Department of Conservation, Farmland Mapping and Monitoring Program (FMMP) farmland and as such, would not be classified as an important agricultural resource. The Project site is designated as Urban and Built-Up Land by the Department of Conservation. Therefore, there are no agricultural resources on the site that would be impacted.

As previously discussed, the GPU EIR determined impacts from direct and indirect conversion of agricultural resources to be significant and unavoidable. However, the proposed Project would have no impact. Therefore, the Project would be consistent with the analysis provided within the GPU EIR.

2(b) The GPU EIR concluded this impact to be less than significant with mitigation. The Project site is zoned RS, which is not an agricultural use and the site was previously developed

with a single-family dwelling. The site does not meet the definition of “agricultural resource” as defined in the County Guidelines for Determining Significance: Agricultural Resources. The Project site is not within an agricultural preserve or a Williamson Act Contract. Additionally, the Project is for the development of a residential subdivision, which is compatible with the surrounding residential and civic use types. Therefore, the Project would not conflict with existing zoning for agricultural use or a Williamson Act Contract.

As previously discussed, the GPU EIR determined impacts from land use conflicts to be less than significant with mitigation. As the proposed Project would have 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 CEQA Guidelines was amended to include significance criteria for forestry resources after the release of the Notice of Preparation (NOP) for the GPU EIR. The project site does not contain any forest lands as defined in California Public Resources Code §12220(g); therefore, project implementation would not result in the loss or conversion of forest land to non-forest use. In addition, the County does not have any existing Timberland Production Zones. Therefore, project implementation would not conflict with existing zoning for, or cause rezoning of, forest land, timberland, or Timberland Production Zones. Impacts would be less than significant.

As previously discussed, forestry resources were not specifically analyzed under the GPU EIR because Appendix G of 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 on forest resources for the reasons detailed above, the project would be consistent with the analysis in the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance other than the information identified in the GPU EIR.

- 2(d) Forestry resources were not specifically analyzed under the GPU EIR because Appendix G of the CEQA Guidelines was amended to include significance criteria for forestry resources after the release of the NOP for the GPU EIR. As indicated in Section 2(c), the project site does not contain any forest lands. Therefore, the project would be consistent with the analysis provided in the GPU EIR because it would not increase impacts identified in the GPU EIR.

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

As previously discussed, the GPU EIR determined impacts from direct and indirect conversion of agricultural resources (including forest resources) to be significant and unavoidable. However, the proposed Project determined impacts to agricultural resources to be less-than-significant. 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 Agriculture/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. Therefore, the Project would not result in an impact which was not adequately evaluated by the GPU EIR.

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

Discussion

3(a) The GPU EIR concluded this impact to be less than significant. The RAQS is the applicable regional air quality plan that sets forth the San Diego Air Pollution Control District's (SDAPCD) strategies for achieving the National Air Quality Standards (NAAQS) and California Air Quality Standards (CAAQS). The San Diego Air Basin (SDAB) is designated a non-attainment area for the federal and state ozone standard. Accordingly, the RAQS was developed to identify feasible emission control measures and provide expeditious progress toward attaining the standards for ozone. The two pollutants addressed in the RAQS are hydrocarbons (ROG) and oxides of nitrogen (NOX), which are precursors to the formation of ozone. Projected increases in motor vehicle usage, population, and growth create challenges in controlling emissions and, by extension, to maintaining and improving air quality. The RAQS was most recently updated in 2022.

The growth projections used by the SDAPCD to develop the RAQS emissions budgets are based on the population, vehicle trends, and land use plans developed in general plans and used by the San Diego Association of Governments (SANDAG) in the development of the Regional Transportation Plan and Sustainable Communities Strategy. As such, projects that propose development that is consistent with the growth anticipated by SANDAG's growth projections and/or the General Plan would not conflict with the RAQS. If a project proposes development that is less dense than anticipated by the growth projections, the project would likewise be consistent with the RAQS. In the event a project proposes development that is greater than anticipated in the growth projections, further analysis would be warranted to determine if the project would exceed the growth projections used in the RAQS for the specific subregional area.

The Project site is designated as Village Residential (VR-7.3) in the County's General Plan and zoned RS (Single Family Residential). The Project proposes to subdivide 1.98 acres into a ten-lot subdivision. This would be consistent with the General Plan land use designation and density. Because the proposed Project is allowed under the General Plan land use designation and would not increase the density or intensity of the land assumed in the GPU EIR, which is used in SANDAG's growth projections, and would not result in growth beyond that assumed in SANDAG's growth assumptions or in the General Plan projections, it is consistent with San Diego County Air Pollution Control District's (SDAPCD's) RAQS and portions of the SIP. As such, the Project would not conflict with either the RAQS or the SIP. The RAQS "emissions inventory, projections, and trends are based on ozone precursor emissions data compiled and maintained by CARB [California Air Resources Board]. Supporting data were jointly developed by CARB, the [SDAPCD], and [SANDAG], which each play a role in collecting and reviewing the data necessary to generate comprehensive planning emission inventories" (SDAPCD 2022). CARB modeling utilizes the most current growth and emissions control data available to provide comprehensive projections of emissions for each year from 2022 to 2050. Current regional growth projections are accounted for in the RAQS, and the project would provide additional housing needed to meet the needs of the region. Further, as shown in Tables 2 and 3 in Section 3(b), the project would not result in construction or operational emissions in excess of the applicable significance thresholds for all criteria pollutants. The project would, therefore, not result in an increase in emissions that are not already accounted for in the RAQS. Thus, the project would not obstruct or conflict with implementation of the RAQS. Impacts would be considered less than significant.

As previously discussed, the GPU EIR determined impacts on air quality 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 in the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance other than the information identified in the GPU EIR.

- 3(b) The GPU EIR concluded impacts to be significant and unavoidable. As discussed in Air Quality 3(a), San Diego County is currently in non-attainment for O₃ under the National Ambient Air Quality Standard (NAAQS). San Diego County is also presently in nonattainment for O₃, PM₁₀ and PM_{2.5} under the California Ambient Air Quality Standard (CAAQS). O₃ is formed when volatile organic compounds (VOCs) and nitrogen oxides (NO_x) react in the presence of sunlight. VOC sources include any source that burns fuels (e.g., gasoline, natural gas, wood, oil), solvents, petroleum processing and storage, and pesticides. Sources of NO_x include any source that burns fuel. Sources of PM₁₀ and PM_{2.5} in both urban and rural areas include the following: motor vehicles, wood burning stoves

and fireplaces, dust from construction, landfills, agriculture, wildfires, brush/waste burning, and industrial sources of windblown dust from open lands.

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

Table 2 County of San Diego Screening Level Thresholds			
Pollutant	Emission Rate		
	Pounds/Hour	Pounds/Day	Tons/Year
Respirable Particulate Matter (PM ₁₀)	--	100	15
Fine Particulate Matter (PM _{2.5})	--	55 ^a	10 ^a
Oxides of Nitrogen (NO _x)	25	250	40
Oxides of Sulfur (SO _x)	25	250	40
Carbon Monoxide (CO)	100	550	100
Lead and Lead Compounds	--	3.2	0.6
Volatile Organic Compounds (VOCs)	--	75 ^b	13.7 ^c
SOURCE: SDAPCD, Rules 20.1, 20.2, 20.3; County of San Diego 2007.			
^a Based on the U.S. EPA "Proposed Rule to Implement the Fine Particle National Ambient Air Quality Standards" published September 8, 2005. Also used by the South Coast Air Quality Management District.			
^b Threshold for VOCs based on the threshold of significance for VOCs from the South Coast Air Quality Management District for the Coachella Valley.			
^c 13.7 tons per year threshold based on 75 pounds per day multiplied by 365 days per year and divided by 2,000 pounds per ton.			

Air emissions were calculated using California Emissions Estimator Model (CalEEMod) 2022.1.1.44. CalEEMod is a tool used to estimate air emissions resulting from land development projects in the state of California. The model generates air quality emission estimates from construction activities and breaks down operational criteria pollutant emissions into three categories: mobile sources (e.g., traffic), area sources (e.g., landscaping equipment, consumer projects, and architectural coatings), and energy sources (e.g., natural gas heating). CalEEMod provides emission estimates of NO_x, carbon monoxide (CO), oxides of sulfur (SO_x), respirable particulate matter (PM₁₀), fine particulate matter (PM_{2.5}), and VOCs. Inputs to CalEEMod include such items as the air basin containing the project, land uses, trip generation rates, trip lengths, duration of construction phases, construction equipment usage, grading areas, as well as other parameters.

The Project proposes to subdivide and build 10 residential houses. Construction of the Project is expected to begin in April 2027 and be completed at the end of 2028. Emissions generated during construction activities would be temporary and localized. Earthwork activities during construction of the Project would require 96 cubic yards of cut and 16,019 cubic yards of fill and no export. Construction activities would be subject to the County of San Diego Grading Ordinance and SDAPCD Rule 55 to reduce fugitive dust. To further reduce potential impacts generated during the construction phase, the Project would include the following project design features, consistent with local, regional, and state regulations as well as GPU EIR mitigation measures Air-2.5, Air-2.6, Air-2.7, and Air-2.9.

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

With the application of the measures listed above, Project construction emissions associated with the proposed residential development are not anticipated to exceed the County's construction SLTs (Table 2).

Table 2 Summary of Maximum Daily Project Construction Emissions (pounds per day)						
Phase	Pollutant					
	ROG	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Maximum Daily Emissions	12.3	55.7	31.2	0.3	16.6	6.0
<i>County Screening Level Thresholds</i>	75	250	550	250	100	55
Above Threshold?	No	No	No	No	No	No
ROG = reactive organic gas; NO _x = oxides of nitrogen; CO = carbon monoxide; SO _x = oxides of sulfur; PM ₁₀ = particulate matter less than 10 microns in diameter; PM _{2.5} = particulate matter less than 2.5 microns in diameter; CalEEMod = California Emissions Estimator Model						

The main operational impacts associated with the Project would include impacts associated with mobile sources; with additional impacts associated with area sources such as energy use and landscaping. Emissions of all pollutants would be below the County's recommended SLTs (Table 3). Therefore, the Project would not violate any air quality standard or contribute substantially to an existing or projected air quality violation.

Table 3 Summary of Daily Project Operational Emissions (pounds per day)						
Source	Pollutant					
	ROG	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Maximum Daily Emissions	16.1	0.6	21.6	0.0	2.6	0.1
<i>County Screening Level Thresholds</i>	75	250	550	250	100	55
Above Threshold?	No	No	No	No	No	No
ROG = reactive organic gas; NO _x = oxides of nitrogen; CO = carbon monoxide; SO _x = oxides of sulfur; PM ₁₀ = particulate matter less than 10 microns in diameter; PM _{2.5} = particulate matter less than 2.5 microns in diameter; County = County of San Diego						
*Note that the project would be all-electric and would not include any natural gas appliances. However, emissions were conservatively calculated using CalEEMod defaults for natural gas.						
**Totals may vary due to independent rounding.						

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

- 3(c) The GPU EIR concluded this impact to be significant and unavoidable. San Diego County is presently in non-attainment for the NAAQS and CAAQS for O₃. San Diego County is also presently in non-attainment for PM₁₀ and PM_{2.5} under the CAAQS. O₃ is formed when

VOCs and oxides of nitrogen (NO_x) react in the presence of sunlight. VOC sources include any source that burns fuels (e.g., gasoline, natural gas, wood, oil); solvents; petroleum processing and storage; and pesticides. Sources of PM_{10} and $\text{PM}_{2.5}$ in both urban and rural areas include: motor vehicles, wood burning stoves and fireplaces, dust from construction, landfills, agriculture, wildfires, brush/waste burning, and industrial sources of windblown dust from open lands.

The Project would contribute PM_{10} , $\text{PM}_{2.5}$, NO_x , and VOC emissions from construction/grading activities; however, it would not exceed established SLTs (see response 3(b) above). Additionally, grading and all other construction activities would be subject to the measures listed above, including the implementation of dust control measures consistent with the County of San Diego Grading Ordinance and SDAPCD Rule 55. Additionally, the Project would include the use of USEPA certified Tier 3 and Tier 4 construction equipment with DPF or equivalent for the construction activity, which would further reduce emissions of particulate matter during construction.

The Project would generate PM_{10} , $\text{PM}_{2.5}$, and NO_x emissions during Project operations primarily from mobile sources (i.e., vehicle trips), and VOCs from area and mobile sources. However, as previously described, operational emissions of all pollutants would be below the County's recommended SLTs.

Cumulative impacts could occur if the most intensive phases of construction for the proposed Project occur simultaneously with other intensive phases of proposed projects in close proximity. The most intensive construction phase for the Project and for typical developments occurs during earthwork and grading activities. During these phases, the primary criteria air pollutant of concern would be PM_{10} . No cumulatively considerable projects exist within a 0.5-mile radius from the Project site. In addition, the Project's estimated emissions of criteria air pollutants, specifically PM_{10} , was estimated to be 16.6 lb/day, which would be well below the County's SLT of 100 lb/day for PM_{10} during construction activities. Further, due to the highly dispersive nature of particulate matter, a cumulative impact during construction activities would only occur if a project adjacent to the proposed Project undergoes simultaneous grading/earthwork activities and emits significantly greater PM_{10} emissions than the Project. Because all projects developed within the County would be required to comply with the County Grading Ordinance and SDAPCD Rule 55, this scenario is not anticipated to occur.

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

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

- 3(d) The GPU EIR concluded this impact to be significant and unavoidable. Air quality regulators typically define sensitive receptors as schools (Preschool – 12th Grade), hospitals, resident care facilities, day-care centers, residences, or other facilities that may house individuals with health conditions that would be adversely impacted by changes in air quality. Because the Project proposes residential land uses, the proposed Project would not be considered a point-source of significant operational emissions. The nearest sensitive receptors to the Project site are existing residential dwelling units located adjacent to the Project site boundaries and schools (i.e., Community Montessori, Dimensions Collaborative School, Element Education) located approximately 500 feet southwest of the Project site. Therefore, the Project would generate limited construction emissions in the vicinity of sensitive receptors.

Carbon Monoxide Hotspot Analysis

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

A CO hotspot analysis is required by the County if a proposed development would cause road intersections to operate at or below a LOS E with intersection peak-hour trips exceeding 3,000 trips. Daily trips would be limited due to the relatively small scope of the project. For instance, CalEEMod estimates a maximum (Saturday) daily trip rate of 9.5 vehicle trips per day for the 10 single-family housing units combined. Therefore, the negligible additional traffic generated during project operation would not cause intersections in the vicinity of the project site to operate at or below LOS E, and a CO hotspot analysis is not required for the proposed project as project-generated trips would not result in, or substantially contribute to, CO concentrations that exceed the eight-hour ambient air quality standards along area roadways and intersections.

Toxic Air Contaminants (TACs)

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

Construction-related activities would result in short-term, project-generated emissions of DPM exhaust emissions from off-road, heavy-duty diesel equipment for site preparation grading, building construction, and other construction activities. DPM was identified as a TAC by CARB in 1998. The potential cancer risk from the inhalation of DPM (discussed in the following paragraphs) outweighs the potential non-cancer health impacts and is therefore the focus of this discussion (CARB 2017).

Generation of DPM from construction projects typically occurs in a single area for a short period. Construction of the proposed project would occur over approximately 12 months. The dose to which the receptors are exposed is the primary factor used to determine health risk. Dose is a function of the concentration of a substance or substances in the environment and the extent of exposure that person has with the substance. Dose is positively correlated with time, meaning that a longer exposure period would result in a

higher exposure level for the Maximally Exposed Individual. The risks estimated for a Maximally Exposed Individual are higher if a fixed exposure occurs over a longer period of time. According to the California Office of Environmental Health Hazard Assessment (OEHHA), health risk assessments (HRA), which determine the exposure of sensitive receptors to toxic emissions, should be based on a 30-year exposure period (assumed to be the approximate time that a person spends at a single household location). OEHHA recommends this risk be bracketed with nine-year and 70-year exposure periods and that HRA should be limited to the period/duration of activities associated with the project (OEHHA 2015).

The maximum on-site PM_{2.5} emissions, which are used to represent DPM emissions for this analysis, would occur during site preparation and grading activities. While site preparation and grading emissions represent the worst-case condition, such activities would only occur for approximately one week, which represents less than one percent of the typical health risk calculation periods of 9 years, 30 years, and 70 years. PM_{2.5} emissions would decrease for the remaining construction period because construction activities such as building construction and paving would require less construction equipment. Therefore, given the aforementioned, DPM generated by project construction is not expected to create conditions where the probability that the Maximally Exposed Individual would contract cancer is greater than ten in one million or to generate ground-level concentrations of non-carcinogenic TACs that exceed a Hazard Index greater than one for the Maximally Exposed Individual. Lastly, the project would not generate substantial trips from large or heavy-duty vehicles that could generate mobile diesel emissions due to the local-serving nature of the proposed use.

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

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

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

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

- 3(e) The GPU EIR concluded this impact to be less than significant. The Project could produce objectionable odors during the construction phases of paving and painting activities, which would require bitumen and solvents from the placement of hot asphalt and architectural coating. Exhaust from construction equipment may also generate odors. However, due to the dispersive nature of odors, these short-term impacts would be fairly short-lived and would not cause objectionable odors affecting a substantial number of people. Furthermore, the Project would be subject to SDAPCD Rule 51, Nuisance Rule, which prohibits emissions of any material that causes nuisance to a considerable number of persons or endangers the comfort, health, or safety of any person. The Project would result in the future development of residential uses, which are not generally associated with the generation of objectionable odors. Thus, the Project would not create objectionable odors affecting a substantial number of people during construction activities or operations.

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

Conclusion

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

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

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

☐	☐	☐
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- 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

- 4(a) The GPU EIR concluded this impact to be significant and unavoidable. Biological resources on the project site were evaluated by County staff as well as review of permit history and historic aerals. The Project site has been developed previously with a single-family house and disturbed. The Project site is also surrounded by residential development as well as State Route 78 and Interstate 15. As a result of previous development and permits, the Project site has been found to be considered urban/developed and does not support habitat or sensitive species that would require mitigation as a result of impacts from the Project.

As previously discussed, the GPU EIR determined impacts to sensitive habitat and/or species to be significant and unavoidable. However, the Project impacts were determined to be less than significant for the reasons detailed above. Therefore, the Project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 4(b) The GPU EIR concluded this impact to be significant and unavoidable. As detailed in response a) the Project site has been previously disturbed and developed. As a result, the Project site does not support riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or US Fish and Wildlife Service.

As previously discussed, the GPU EIR determined impacts to riparian habitat or other sensitive natural community to be significant and unavoidable. However, the Project impacts were determined to be less than significant for the reasons detailed above. Therefore, the Project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 4(c) The GPU EIR concluded this impact to be less than significant with mitigation. The proposed project site does not contain any jurisdictional water features or wetlands as defined by Section 404 of the Clean Water Act; therefore, no impacts will occur. As previously discussed, the GPU EIR determined impacts to federally protected wetlands as significant with mitigation. 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. As detailed in response (a), Biological Resources were evaluated through a site visit by County staff as well as review of previous permits and historical aerials. It was determined that the site is not part of a regional linkage/corridor nor is it in an area considered regionally important for wildlife dispersal. The site would not assist in local wildlife movement as it lacks connecting vegetation and visual continuity with other potential habitat areas in the general project vicinity. The Project site is also surrounded by development including State Route 78 and Interstate 15 as well as residential development. The project site is also not located within a pre-approved mitigation area within an adopted MSCP Subarea.

As previously discussed, the GPU EIR determined impacts to wildlife movement corridors as significant and unavoidable. However, the Project impacts were determined to be less than significant for the reasons detailed above. Therefore, the Project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 4(e) The GPU EIR concluded this impact to be less than significant. The project is located within the draft North County Multiple Species Conservation Program (NCMSCP) and outside of the adopted South County MSCP. Therefore, it does not require conformance with the Biological Mitigation Ordinance (BMO). The project is consistent with the County's Guidelines for Determining Significance for Biological Resources, the Resource Protection Ordinance (RPO), and the Migratory Bird Treaty Act (MBTA) as the site has been previously developed and disturbed as described in response 4(a). The Project will include a standard notice regarding breeding season avoidance in the event that nesting birds are found on the property prior to construction in order to comply with the MBTA. The Project will not conflict with the provisions of any adopted Habitat Conservation Plan, Natural Communities Conservation Plan, other approved local, regional, or state habitat conservation plan or any other local policies or ordinances that protect biological resources. Therefore, the project will not conflict with the provisions of any adopted Habitat Conservation Plan, Natural Communities Conservation Plan, other approved local, regional or state habitat conservation plan or any other local policies or ordinances that protect biological resources.

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. No mitigation measures contained within the GPU EIR would be required because Project specific impacts would be less than significant. Therefore, the Project would not result in an impact which was not adequately evaluated by the GPU EIR.

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

Discussion

The following technical study was prepared for the Project:
A Negative Cultural Resources Survey Report For The 1434 Montiel Road Project, dated January 19, 2024, prepared by Tracy Stropes, BFSa Environmental Services

- 5(a) The GPU EIR concluded this impact to be less than significant with mitigation. Based on an analysis of records and a survey of the property by County approved archaeologist, Tracy Stropes, it has been determined that there are no impacts to historical resources because they do not occur within the project site. The results of the survey are provided in an historical resources report titled, A Negative Cultural Resources Survey Report For The 1434 Montiel Road Project (January 19, 2024), prepared by Tracy Stropes. Therefore, the Project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.
- 5(b) The GPU EIR concluded this impact to be less than significant with mitigation. Based on an analysis of records and a survey of the property by County approved archaeologist, Tracy Stropes, it has been determined that there are no impacts to archaeological resources because they do not occur within the project site. The results of the survey are provided in an historical resources report titled, A Negative Cultural Resources Survey Report For The 1434 Montiel Road Project (January 19, 2024), prepared by Tracy Stropes.

In addition, the Native American Heritage Commission (NAHC) was contacted for a listing of Native American Tribes whose ancestral lands may be impacted by the project. The

NAHC response was received on October 27, 2021, indicating sacred sites, on record with the commission, were present on the project property. The NAHC recommended contacting the Kwaaymii Laguna Band of Mission Indians, the Rincon Band of Luiseño Indians, and the San Luis Rey Band of Mission Indians. All of the Native American groups and the Native American list provided by the NAHC were contacted. Only one tribe (Agua Caliente Band of Cahuilla Indians) responded identifying that the project is outside of their traditional use area, and they deferred to other tribes in the area.

Aleshanee Ventura of Saving Sacred Sites served as the Native American monitor during the cultural survey. No information has been obtained through Native American outreach or communication with the Native American monitor during fieldwork that any culturally or spiritually significant resources were present. No Traditional Cultural Properties that currently serve religious or other community practices are known to exist within the project area. During the current archaeological evaluation, no artifacts or remains were identified or recovered that could be reasonably associated with such practices.

Although no resources were identified during site surveys, responses from Native American tribes during outreach efforts by Laguna Mountain Environmental during the preparation of the cultural study, requested monitoring during earth-disturbing activities. In addition, the potential exists for subsurface deposits because several recorded archaeological sites are located within the vicinity of the project.

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 Luiseño Native American monitor and conformance with the County's Cultural Resource Guidelines if resources are encountered. The GPU EIR identified these mitigation measures as Cul 2.5. The project will be conditioned with archaeological monitoring (Cul-2.5) that includes the following requirements:

- Pre-Construction
 - Contract with a County approved archaeologist to perform archaeological monitoring and a potential data recovery program during all earth-disturbing activities. The Project Archaeologist shall perform the monitoring duties before, during and after construction.
 - Pre-construction meeting to be attended by the Project Archaeologist and Luiseño Native American monitor to explain the monitoring requirements.
- Construction
 - Monitoring. Both the Project Archaeologist and Luiseño Native American monitor 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 Luiseño Native American monitor. Both the Project Archaeologist and Luiseño Native American monitor will evaluate fill soils to ensure that they are negative for cultural resources
 - If cultural resources are identified:
 - Both the Project Archaeologist and Luiseño Native American monitor 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, and culturally-affiliated tribes as identified in the Treatment Agreement and Preservation Plan at the time of discovery.
- All ground disturbance activities within 100 feet of the discovered cultural resources shall be halted until a meeting is convened between the developer, the project archaeologist, tribal monitor(s), and the tribal representative(s) to discuss the significance of the find. Optionally, the County Archaeologist may attend the meeting to discuss the significance of the find.
- Construction activities shall not resume in the area of discovery until an agreement has been reached by all parties as to appropriate mitigation. Work shall be allowed to continue outside of the buffer area and shall be monitored.
- Isolates and non-significant deposits shall be minimally documented in the field. The isolates and/or non-significant deposits shall be reburied onsite as identified in the Treatment Agreement and Preservation Plan.
- Treatment and avoidance of the newly discovered resources shall be consistent with the Treatment Agreement and Preservation Plan entered into with the appropriate tribes. This may include avoidance of the cultural resources through project design, in-place preservation of cultural resources located in native soils and/or re-burial on the Project property so they are not subject to further disturbance in perpetuity.
- If cultural resources are identified, one or more of the following treatments, in order of preference, shall be employed:
 - Preservation in place of the Cultural Resources, if feasible. Preservation in place means avoiding the resources, leaving them in place where they were found with no development affecting the integrity of the resources.
 - Reburial of the resources on the project property. The measures for reburial shall include, at least, the following:
 - Measures and provisions to protect the future reburial area from any impacts in perpetuity.
 - Reburial shall not occur until all legally required cataloging and basic recordation have been completed, with the exception that sacred items, burial goods, and Native American human remains are excluded.
 - Any reburial process shall be culturally appropriate.
 - Listing of contents and location of the reburial shall be included in the confidential appendix of the Monitoring Report.
 - The Monitoring Report shall be filed with the County under a confidential cover and is not subject to Public Records requests.
- If preservation in place or reburial is not feasible, a Research Design and Data Recovery Program (Program) shall be prepared by the Project Archaeologist in consultation with the Tribe, and the Luiseño Native American Monitor and approved by the County Archaeologist prior to implementation. There shall be no destructive or invasive testing on sacred items, burial goods, and Native American human remains. Results concerning finds of any inadvertent discoveries shall be included in the Monitoring Report.

Pursuant to Calif. Pub. Res. Code § 21083.2(b) avoidance is the preferred method of preservation for archaeological resources and cultural resources. If the landowner and the Tribe(s) cannot agree on the significance or the mitigation for the archaeological or cultural resources, these issues will be presented to the Planning & Development Services Director for decision. The Planning & Development Services Director shall make the determination based on the provisions of the California Environmental Quality Act with

respect to archaeological resources, recommendations of the project archeologist and shall take into account the cultural and religious principles and practices of the Tribe.

- 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 Luiseño Native American monitor.
 - If the remains are determined to be of Native American origin, the NAHC shall immediately contact the Most Likely Descendant (MLD).
 - The immediate vicinity where the Native American human remains are located is not to be damaged or disturbed by further development activity until consultation with the MLD regarding their recommendations as required by Public Resources Code Section 5097.98 has been conducted.
 - The MLD may with the permission of the landowner, or their authorized representative, inspect the site of the discovery of the Native American human remains and may recommend to the owner or the person responsible for the excavation work means for treatment or disposition, with appropriate dignity, of the human remains and any associated grave goods. The descendants shall complete their inspection and make recommendations or preferences for treatment within 48 hours of being granted access to the site.
 - Public Resources Code §5097.98, CEQA §15064.5 and Health & Safety Code §7050.5 shall be followed in the event that human remains are discovered.
- Tribal Cultural Resources
 - If tribal cultural resources are discovered, the Project Archaeologist shall conduct consultation with culturally-affiliated tribes to determine the most appropriate mitigation. Should the two parties not be able to reach consensus, then the County Archaeologist shall consider the concerns of the culturally-affiliated tribe and the Project Archaeologist, and the Director of Planning & Development Services shall make a final decision regarding appropriate mitigation.
- Fill Soils
 - The Project Archaeologist and Luiseño Native American monitor shall evaluate fill soils to determine that they are clean of cultural resources.
- Rough Grading
 - Monitoring Report. Upon completion of Rough Grading, a monitoring report shall be prepared identifying whether resources were encountered. A copy of the monitoring report shall be provided to the South Coastal Information Center and any culturally-affiliated tribe who requests a copy.
- Final Grading
 - Final. Report. A final report shall be prepared substantiating that earth-disturbing activities are completed and whether cultural resources were encountered. A copy of the final report shall be submitted to the South Coastal Information Center, and any culturally-affiliated tribe who requests a copy.

- Cultural Material Conveyance
 - The final report shall include evidence that all Native American cultural materials in order of preference have been conveyed as follows:
 - Evidence that all prehistoric materials collected during the archaeological monitoring program have been reburied.

or

- Evidence that all prehistoric materials collected during the grading monitoring program have been repatriated to a Native American group of appropriate tribal affinity. Evidence shall be in the form of a letter from the Native American tribe to whom the cultural resources have been repatriated identifying that the archaeological materials have been received.
- The final report shall include evidence that all historic materials have been curated at a San Diego curation facility and shall not be curated at a Tribal curation facility or repatriated. The collections and associated records, including title, shall be transferred to the San Diego curation facility and shall be accompanied by payment of the fees necessary for permanent curation. Evidence shall be in the form of a letter from the curation facility stating that the historic materials have been received and that all fees have been paid.

The GPU EIR identified these mitigation measures as Cul-2.5. The environmental documentation associated with the project does not consist of a Mitigated Negative Declaration, Negative Declaration, or Environmental Impact Report which requires AB-52 consultation. The project is required to conform with Grading Ordinance Sections 87.429 and 87.430 which requires grading operations to be suspended in the event that resources are encountered and a County Official shall be informed to evaluate potentially significant resources.

- 5(c) The GPU EIR concluded this impact to be less than significant. The site does not contain any unique geologic features that have been listed in the County's Guidelines for Determining Significance for Unique Geology Resources nor does the site support any known geologic characteristics that have the potential to support unique geologic features.

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

- 5(d) The GPU EIR concluded this impact to be less than significant with mitigation. A review of the County's Paleontological Resources Maps and data on San Diego County's geologic formations indicates that the project is located on geological formations that do not contain unique paleontological resources. The project is required to conform with Grading Ordinance Sections 87.429 and 87.430 which requires grading operations to be suspended in the event that resources are encountered and a County Official shall be informed to evaluate potentially significant resources.

As considered by the GPU EIR, potential impacts to paleontological resources will be mitigated through ordinance compliance and through implementation of the following mitigation measures: grading monitoring by the project contractor and conformance with

the County's Paleontological Resource Guidelines if resources are encountered. The GPU EIR identified these mitigation measures as Cul-3.1.

- 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. The project is required to conform with Grading Ordinance Sections 87.429 and 87.430 which requires grading operations to be suspended in the event that resources are encountered and a County Official shall be informed to evaluate potentially significant resources. As previously discussed, the GPU EIR determined impacts to human remains as less than significant with mitigation. The proposed Project determined impacts to human remains as potentially significant.

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 will be applied to the project.

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

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

Discussion

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

maximize energy efficiency and reduce GHGs. Goal COS-17 promotes sustainable solid waste management. Policies COS-17.1 and COS-17.5 would support this goal by reducing GHG emissions through waste reduction techniques and methane recapture. The analysis below specifically analyzes the energy use of the Project.

- 6(a) The Project would 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 (PRC 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, Title 24, Part 6, Building Code, 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 the California Building Code regulations, would occur through the transport of construction materials to and from the site during the construction phase, and the use of vehicles and consumption of energy by occupants.

Grading and Construction

The Project would employ standard construction activities and equipment typical of residential development projects of similar size and scale in a semi-rural setting. Construction equipment requiring electricity would primarily be gas-powered or diesel-powered, and construction activities would also generate vehicle trips associated with construction workers, vendors, and hauling operations traveling to and from the project site. Construction is anticipated to occur over approximately 12 months and would generate approximately 4 to 15 worker vehicle trips per day during most construction phases, 500 hauling trips during grading activities, and no vendor trips during the building construction phase. These trip estimates are consistent with CalEEMod defaults based on the proposed land use and project density and are considered standard for a project of this size. It is not anticipated that the onsite construction workforce would exceed that of comparable projects, and there are no unusual project characteristics that would require construction equipment or methods that are less energy efficient than those used for similar residential developments.

During grading and construction, the Project would consume energy primarily in the form of petroleum-based fuels used by construction vehicles and equipment. To a lesser extent, electricity would be consumed for temporary power needs, such as lighting and electronic equipment, and any natural gas consumption associated with construction activities would be temporary and negligible. Energy use associated with the manufacturing and transport of construction materials, such as asphalt and pipes, would also occur as part of normal construction activities. However, these activities would be temporary in nature and would not require additional energy capacity or substantially increase peak or base-period demand for electricity, natural gas, or other energy resources.

Because the Project would utilize standard construction practices and equipment typical for residential development, and because the Project is consistent with the General Plan Update (GPU) and Zoning Ordinance, construction-related energy consumption would not be considered wasteful, inefficient, or unnecessary. Therefore, impacts related to energy use during the grading and construction phases of the Project would be less than significant.

Operation

The operational impacts of the project would be comparable to similar uses in the County. Operational energy use would be associated with transportation-related fuel use and building-related energy use. New construction is required to meet mandatory energy standards in accordance with the version of the Title 24 Energy Code that is in effect at the time building permits are received. New construction and major renovations must demonstrate their compliance with the current Energy Code through submittal and approval of a Title 24 Compliance Report to the local building permit review authority and the California Energy Commission. The 2025 California Green Building Standards Code (CALGreen) institutes mandatory minimum environmental performance standards for all ground-up new construction of non-residential and residential structures. The 2025 CALGreen includes mandatory residential measures, including but not limited to requirements for bicycle parking, parking for clean air vehicles, electric vehicle (EV) charging stations, lighting, water conservation, waste reduction, and building maintenance. Furthermore, as discussed in Section 8, Greenhouse Gas Emissions, the project would implement measures consistent with the CAP. These measures include the installation of electric vehicle (EV) charging infrastructure in each garage, all-electric appliances, increase in renewable energy per CALGreen Section A4.601.5 Tier 2, and an increase in water and wastewater efficiency. Therefore, compliance with Energy Code, CALGreen performance standards, and the County's CAP would ensure operation of the project would not result in wasteful, inefficient, or unnecessary consumption of energy resources, and impacts would be less than significant.

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

- 6(b) The applicable state and local plans that address renewable energy and energy efficiency include the 2025 CALGreen, the 2025 California Energy Code (Title 24), the Renewables Portfolio Standard (RPS), and the County of San Diego 2024 Climate Action Plan (CAP). As discussed above in Section 6(a), the Project would be required to comply with the mandatory energy requirements of the Energy Code and CALGreen in effect at the time of development. New construction would demonstrate compliance through the submittal and approval of Title 24 Compliance Reports to the local building permit review authority and the California Energy Commission.

The proposed Project incorporates several energy conservation and efficiency measures designed to reduce operational energy demand and support renewable energy use. These measures include installation of electric vehicle (EV) charging infrastructure on all residential lots, incorporation of all-electric appliances and equipment within the residential units, and installation of solar panels on all dwelling units. The Project would also comply with Tier 2 CALGreen energy efficiency standards and include renewable energy features consistent with the County's CAP. In addition, the Project would provide sidewalks and ADA-compliant curb ramps to support active transportation opportunities and reduce reliance on single-occupancy vehicle trips.

Additional conservation measures include water-efficient fixtures and landscaping features, such as EPA WaterSense-labeled water closets and shower heads, compliance

with CALGreen Tier 2 water efficiency measures, and landscaping consistent with the County Landscaping Ordinance, including at least two trees per dwelling unit.

The RPS promotes diversification of California’s electricity supply and decreases reliance on fossil fuel energy sources. The Project would be served by San Diego Gas and Electric (SDG&E), which, pursuant to Senate Bill 350 (2015), is required to achieve a renewable energy mix of 60 percent by 2030. According to the California Public Utilities Commission’s latest report to the Legislature, SDG&E achieved approximately 59 percent renewable energy as of 2022. Implementation of the Project would not interfere with SDG&E’s progress toward achieving RPS goals. Furthermore, the Project would not conflict with the County’s adopted CAP, which includes policies and measures related to energy efficiency, renewable energy, and reduced greenhouse gas emissions.

As previously discussed, energy use was evaluated as part of the County General Plan Update (GPU) and GPU Environmental Impact Report (EIR) and incorporated into applicable General Plan elements. The Project would not conflict with policies within the GPU related to energy use, nor would it conflict with or obstruct any applicable state or local plan for renewable energy or energy efficiency identified in Appendix G of the CEQA Guidelines. Therefore, the Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency, and impacts would be less than significant.

Conclusion

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

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

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
7. Geology and Soils – Would the Project:			
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving: rupture of a known earthquake fault, strong seismic ground shaking, seismic-related ground failure, liquefaction, and/or landslides?	☐	☐	☐
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☐
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in an on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	☐

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

☐☐☐

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

☐☐☐

Discussion

The following technical study was prepared for the Project:

- Preliminary Geotechnical Investigation Report for Proposed Residential Subdivision, 1434 Montiel Rd., Escondido, California, prepared by ABI Engineering Consultants, dated October 25, 2022 (Attachment X).
- Steep Slope Exhibit prepared by ABI Engineering Consultants, dated June 3, 2023 (Attachment X).

The following responses have incorporated the analysis from the report.

7(a)(i) The GPU EIR concluded this impact to be less than significant. The Project 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 Hazard Zones in California, or located on any known active, potentially active, or inactive fault traces. The nearest active faults are the Newport-Inglewood and Elsinore Fault Zones, both located approximately 15.7 miles away. Therefore, the Geological Reconnaissance determined the potential for surface fault rupture at the site to be very low.

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. 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 that impacts related to liquefaction hazards would be less than significant with implementation of existing regulations. The project site is not located within a "Potential Liquefaction Area" as identified by the County Guidelines for Determining Significance for Geologic Hazards. The site is underlain by dense to very dense native Pleistocene alluvial fan deposits and is not underlain by artificial fill. Additionally, the site is not located within a 100- or 500-year FEMA-designated floodplain. The Preliminary Geotechnical Investigation determined that the potential for liquefaction is negligible due to the dense subsurface soils and the absence of shallow groundwater. Therefore, impacts related to ground failure, including liquefaction, would be less than significant. As a standard condition of approval, a site-specific geotechnical report has been prepared and includes design recommendations to ensure geologic stability consistent with Section 2.6.3.1 of the GPU EIR, which outlines applicable federal, state, and local regulatory processes addressing liquefaction.

Conditions of Approval

The following list includes the Project conditions of approval:

As part of project implementation, all grading and construction activities shall be conducted under the observation of a licensed geotechnical professional to ensure compliance with the recommendations provided in the Preliminary Geotechnical Investigation. Prior to any ground-disturbing activities, unsuitable surface soils—including vegetation, debris, and disturbed material—shall be removed and replaced with engineered fill compacted to at least 90 percent relative compaction, with pavement subgrades compacted to 95 percent. Foundations for proposed structures shall consist of shallow footings embedded a minimum of 18 inches below finished grade, designed for an allowable bearing capacity of 2,500 pounds per square foot and reinforced with a minimum of four #4 rebar (two top and two bottom). Slabs-on-grade shall be at least four inches thick, reinforced with #4 bars spaced at 18 inches each way, and constructed over a 15-mil polyethylene vapor barrier in areas where moisture-sensitive flooring is proposed.

Retaining walls shall be designed to resist lateral earth pressures and include subdrain systems to relieve hydrostatic pressure. Site grading and surface drainage shall be designed to direct water away from structures, and post-construction stormwater best management practices (BMPs) shall be located at least 10 feet from building foundations and outside the 1:1 projection from the footing base. The potential for liquefaction at the site is considered negligible due to the dense native alluvial soils and absence of shallow groundwater; therefore, no special mitigation is required beyond adherence to California Building Code (CBC) seismic design parameters, including a Site Class D and a peak ground acceleration of 0.47g. Given the moderate sulfate concentrations found in site soils, concrete in contact with native soil shall comply with CBC Section 1904 and ACI 318, including the use of Type II Portland cement and a maximum water-cement ratio of 0.50. All geotechnical recommendations shall be incorporated into final grading and building plans to ensure long-term stability and conformance with applicable state and local regulations.

- 7(a)(iv) The GPU EIR concluded that impacts related to landslide hazards would be less than significant with adherence to standard regulatory measures. The project site is located within a “Landslide Susceptibility Area” as identified in the County Guidelines for Determining Significance for Geologic Hazards and is classified as “Generally Susceptible.” The site exhibits shallow to steep slope conditions and is underlain by dense Pleistocene alluvial fan deposits and weathered Cretaceous rock, which are not generally prone to landsliding. A geologic reconnaissance of the site observed no geomorphic evidence of historical or active landslides, and there are no mapped or known landslides onsite or in the immediate vicinity. Therefore, the geotechnical investigation concluded that the potential for landsliding at the site is low.

As previously discussed, the GPU EIR determined that impacts associated with seismic hazards and unstable soils would be less than significant, provided compliance with applicable state and local regulations. The proposed project would similarly result in less than significant impacts with implementation of standard conditions of approval, including adherence to the findings and recommendations of a site-specific geotechnical (soils) report. Section 2.6.3.1 of the GPU EIR identifies the preparation and review of geotechnical investigations as part of the regulatory framework addressing potential liquefaction and soil stability hazards. Therefore, the proposed project is consistent with the GPU EIR analysis, and would not result in impacts that exceed or differ substantially from those previously evaluated.

- 7(b) The GPU EIR concluded that impacts related to soil erosion and the loss of topsoil would be less than significant with adherence to applicable County ordinances and regulations.

Although site soils may include types identified in NRCS mapping as having elevated erodibility potential, the proposed project would not result in substantial erosion or topsoil loss due to mandatory compliance with the County's Watershed Protection Ordinance and Grading Ordinance. These regulations require implementation of erosion and sediment control measures, slope stabilization, and site design that prevents the exposure of unprotected erodible soils. The project site includes areas of moderate to steep slope, but all grading would be engineered and include retaining walls to ensure long-term stability. In addition, the project would implement best management practices (BMPs) for erosion and siltation control through a Storm Water Pollution Prevention Plan (SWPPP), and per Mitigation Measure BIO-5. Therefore, consistent with the conclusions of the GPU EIR, the project would result in a less-than-significant impact and would not increase the severity of impacts previously evaluated.

- 7(c) The GPU EIR concluded that impacts related to soil stability and landslide susceptibility would be less than significant with implementation of applicable County regulations. As indicated in response 7(a)(iv), the project site is located within a "Landslide Susceptibility Area" as identified in the County Guidelines for Determining Significance for Geologic Hazards, and is considered to be "Generally Susceptible." The site features relatively flat to steep slopes, but the Preliminary Geotechnical Investigation found no evidence of active or historic landslides and concluded that the risk of ground movement hazards is low. To ensure that proposed buildings are structurally sound, a Soils Engineering (Geotechnical) Report is required as part of the County's grading and building permit process. This report evaluates subsurface conditions and provides design recommendations for foundation systems that must comply with the California Building Code. Final approval by the County is required prior to permit issuance. Therefore, consistent with the analysis provided in the GPU EIR, and with implementation of these standard requirements, the project would result in less-than-significant impacts related to soil stability. The report must be approved by the County prior to the issuance of a building permit. With this standard requirement, impacts would be less than significant.

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

- 7(d) The GPU EIR determined that impacts related to expansive soils would be less than significant with implementation of standard regulatory measures. The geotechnical investigation conducted for the proposed project confirmed that the site is not underlain by expansive soils. Subsurface materials consist of dense to very dense Pleistocene alluvial fan deposits and weathered bedrock, which are not susceptible to significant expansion. As a standard condition of approval, the project is required to implement the recommendations of a site-specific Soils Engineering Report, prepared by a California Registered Geotechnical Engineer, which includes foundation and grading design measures to ensure soil stability. These recommendations will be incorporated into construction and grading plans. Therefore, the project would result in less-than-significant impacts related to expansive soils and would be consistent with the conclusions of the GPU EIR.
- 7(e) The Project would rely on sewer service provided by the Vallecitos Water District and would not propose septic tanks or alternative wastewater disposal systems. Therefore, the Project would not place septic tanks or alternative wastewater disposal systems on soils incapable of adequately supporting such systems. Sewer service would be provided

following annexation into the District, extension of public sewer mains, and compliance with District requirements, including preparation of a wastewater study prior to plan check.

As previously discussed, the GPU EIR determined impacts related to wastewater disposal systems to be less than significant. Because the proposed Project would utilize public sewer service and would not rely on septic systems or alternative wastewater disposal methods, the Project would have a less-than-significant impact for the reasons discussed above. Accordingly, the Project would be consistent with the analysis in the GPU EIR because it would not create new or more severe impacts than those previously identified..

Conclusion

With regards to the issue area of Geology/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. Therefore, the Project would not result in an impact which was not adequately evaluated by the GPU EIR.

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

Discussion

8(a) The GPU EIR concluded this impact to be less than significant with mitigation. Specifically, the GPU directed preparation of a County Climate Action Plan (CAP) with reduction targets; development of regulations to encourage energy efficient building design and construction; and development of regulations that encourage energy recovery and renewable energy facilities, among other actions. These planning and regulatory efforts are intended to ensure that actions of the County do not impede AB 32 and SB 375 mandates. As such, on February 14, 2018, the County Board of Supervisors (Board) adopted a CAP. On September 30, 2020, the Board voted to set aside its approval of the County’s 2018 CAP and related actions because the Final Supplemental EIR was found to be out of compliance with CEQA. As a result, the County has developed a new CAP that was adopted in September of 2024. The 2024 CAP implements climate actions that reduce GHG emissions and establish actions to achieve a goal of net zero carbon emissions by 2045. The CAP establishes emission reduction targets of 43.6 percent

emissions reductions below 2019 levels by 2030 and 85.4 percent below 2019 levels by 2045. This CAP sets GHG reduction targets and a net zero goal in alignment with the 2022 Scoping Plan that was adopted in December 2022. The 2022 Scoping Plan lays out a path to achieve statewide targets for carbon neutrality and reduce anthropogenic GHG emissions by 85 percent below 1990 levels no later than 2045, as directed by AB 1279. The County's CAP has been prepared in accordance with CEQA Guidelines §15183.5, which allows for public agencies to analyze and mitigate GHG emissions as part of a larger "plan for the reduction of greenhouse gases." The CAP, CAP Consistency Review Checklist (Checklist), and the Supplemental EIR for the CAP collectively include the required elements of "a plan for the reduction of greenhouse gas emissions" set forth in CEQA Guidelines §15183.5(b). Therefore, the County's CAP is a CEQA qualified CAP. The purpose of the Checklist is to incorporate applicable CAP measures and actions into projects when they are not otherwise binding and enforceable, and provide a streamlined environmental review process for GHG emissions analysis for projects that require and are not exempt from environmental review pursuant to CEQA and determined to be consistent with the CAP. The Checklist was used to determine the project's consistency with the CAP.

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

Step 1 of the Checklist assesses a project's consistency with the growth projections used in the CAP to estimate future GHG emissions from activities occurring in the unincorporated area and County facilities and operations. Because the CAP uses growth projections based on implementation of the adopted General Plan, the first step in determining a project's consistency with the CAP is to demonstrate its consistency with the regional categories and land use designations of the General Plan. The current land use designation is RS (Residential – Single) and the zoning is RS (Residential – Single). The project would be consistent with these land use and zoning designations and would not require a rezone or GPA. Therefore, the project would be considered consistent for density purposes and may still utilize the CAP Consistency Checklist to determine consistency with the CAP.

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

- Electrify Loading Docks – The Project is a residential development and does not include cold storage or refrigerated warehouse facilities; therefore, this measure is not applicable.
- Install EV Charging Infrastructure – The Project would include EV charging infrastructure installations on all residential lots in compliance with applicable CALGreen Tier 2 requirements.
- Increase Active Transportation – The Project would increase active transportation by constructing sidewalks and ADA-compliant curb ramps consistent with the County's Active Transportation Plan and CAP consistency requirements.

- Reduce Single-Occupancy Vehicle Trips – The County has not yet adopted the Transportation Demand Management (TDM) Ordinance; therefore, this measure is not currently applicable to the Project. However, the Project site is located within one-quarter mile of the SPRINTER train station, which supports alternative transportation opportunities.
- Electrify Buildings and Appliances – The Project would achieve Tier 2 status as set forth in the 2025 CALGreen, Title 24, Part 11, Appendix A4 Residential Voluntary Measures, Division A4.6, Tier 2 consistent with CAP requirements. The Project would incorporate all-electric appliances and equipment within the proposed residential units and include enhanced energy efficiency, installation of Level 2 Electric Vehicle Charging Stations, water-efficient landscaping and fixtures, and diversion of construction waste.
- Increase Renewable Energy – The Project proposes installation of solar panels on all residential dwelling units consistent with CAP renewable energy requirements and CALGreen Tier 2 measures.
- Increase Water Efficiency – The Project would comply with CALGreen Tier 2 water efficiency and conservation requirements. The Project proposes to meet flush and flow water consumption standards through installation of EPA WaterSense-labeled water closets and shower heads and implementation of applicable elective measures identified in Sections A4.303, A4.304, and A4.305 of the 2022 CALGreen Code.
- Increase Tree Preservation – The program to preserve native trees is not in effect. Therefore, this measure is not applicable. Further, the Project site is a previously disturbed residential lot and does not contain native trees.
- Increase Tree Planting – The proposed landscaping plan is consistent with the County Landscaping Ordinance and would include a minimum of two trees per dwelling unit.

As demonstrated with the Checklist, the project would be consistent with the County's CAP. Therefore, the project may rely on the CAP for the cumulative impacts analysis of GHG emissions and GHG impacts would be less than significant.

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 in the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance other than the information identified in the GPU EIR.

8(b) The GPU EIR concluded this impact to be less than significant.

Executive Orders S-3-05 and B-30-15 established GHG emission reduction targets for the state, and AB 32 launched the CARB Climate Change Scoping Plan that outlined the reduction measures needed to reach the 2020 target, which the state has achieved. As required by SB 32, CARB's 2017 Scoping Plan outlines reduction measures needed to achieve the interim 2030 target. AB 1279, the California Climate Crisis Act, codified the carbon neutrality target as 85 percent below 1990 levels by 2045. The 2022 Scoping Plan was adopted in December 2022. The 2022 Scoping Plan lays out a path to achieve targets for carbon neutrality and reduce anthropogenic GHG emissions by 85 percent below 1990

levels no later than 2045, as directed by AB 1279. As detailed above, the project would be consistent with the County's CAP that implements climate actions that reduce GHG emissions and establish actions to achieve a goal of net zero carbon emissions by 2045 and is consistent with these statewide GHG reduction goals.

The project was also evaluated for consistency with the SANDAG Regional Transportation Plan and Sustainable Communities Strategy that demonstrate how the region would meet its transportation-related GHG reduction goals. The growth projections used in San Diego Forward: The 2021 Regional Plan (San Diego Forward) are based on population, vehicle trends, and land use plans developed in general plans. As such, projects that propose development that is consistent with their respective general plan land use designations would be consistent with the growth projections in San Diego Forward. Therefore, because the project development is consistent with the General Plan, it is correspondingly consistent with San Diego Forward and its goals for reducing GHG emissions on a regional level. The project proposes infill residential development and would therefore have a less than significant impact related to vehicle miles traveled (VMT), as discussed further in Section 17(b). Thus, the project would not conflict with any applicable plan, policy or regulation adopted for the purpose of reducing emissions of GHG emissions.

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

Conclusion

With regards to the issue area of Greenhouse Gas Emissions, 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. The project will apply measures outlined within GPU EIR including but not limited to compliance with the County Groundwater Ordinance, Landscape Ordinance, as well as reduction of VMT. Therefore, the Project would not result in an impact which was not adequately evaluated by the GPU EIR. The project will also apply project design features such as no use of natural gas as well as consistency with CALGreen Tier 2 standards for off-street parking.

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

a) Create a significant hazard to the public or the environment through the routine transport, storage, use, or

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disposal of hazardous materials or wastes or through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

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

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

☐ ☐ ☐

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

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

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

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

☐ ☐ ☐

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

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Discussion

- 9(a) The GPU EIR concluded this impact to be less than significant. Project construction would involve the transport of gasoline and other petroleum-based products associated with construction equipment. These materials are considered hazardous as they could cause temporary localized soil and water contamination. Incidents of spills or other localized contamination could occur during refueling, operation of machinery, undetected fluid leaks, or mechanical failure. However, all storage, handling, and disposal of these materials are regulated by the California Department of Toxic Substances Control, the USEPA, and the San Marcos Fire Protection District.

Typically, residential uses do not generate, store, dispose of, or transport large quantities of hazardous substances. Operation of the proposed development would include the storage and use of household hazardous materials and wastes. Typical household hazardous materials associated with the residential land uses could include cleaning products, paints, solvents, adhesives, other chemical materials used in building maintenance and interior improvements, automotive lubricants, small combustion engine fuels and lubricants, expired pharmaceuticals, mercury thermometers, sharp or used needles, and electronic wastes from household and car batteries. No special permits would be required for such limited use or disposal of common agents and products. Therefore, operation of the Project would not expose on-site users or the surrounding community to any health hazards from hazardous materials.

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

As previously discussed, the GPU EIR determined impacts from transport, use and disposal of hazardous materials and accidental release of hazardous materials to be less than significant. The proposed Project would have a less-than-significant impact with standard project conditions for structure and debris removal, and lead and asbestos surveys. The Project conditions are consistent with General Plan Policy S-11.4 as analyzed in the GPU EIR. Thus, 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 concluded this impact to be less than significant. The Project is not located within 0.25 mile of an existing or proposed school. The closest school is Rock Springs Elementary School approximately 1 mile from the project site. The Project does not propose any hazardous emissions or handling of hazardous or acutely hazardous materials or substances. Furthermore, the Project is required to comply with applicable regulations pertaining to hazardous waste to ensure that impacts related to hazardous emissions and schools is less than significant.

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

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

As previously discussed, the GPU EIR determined impacts from existing hazardous materials sites to be less than significant. As the proposed Project would have a less-than-

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

- 9(d) The GPU EIR concluded this impact to be less than significant with mitigation. The proposed project is within the boundaries of the McClellan-Palomar Airport Influence Area. The proposed ten lot subdivision is consistent with the McClellan-Palomar Airport Land Use Compatibility Plan (ALUCP); therefore, the proposed project does not have any airport requirements. In addition, the Project does not propose construction of any structure equal to or greater than 150 feet in height, constituting a safety hazard to aircraft and/or operations from an airport or heliport.

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 a significant and unavoidable impact. 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) The GPU EIR concluded this impact to be less than significant with mitigation because portions of the County would be located within adopted emergency response plan or emergency evacuation plan. For these projects, mitigation measures would be required, consistent with the GPU Mitigation Framework.

- 9(f)(i) Operational Area Emergency Plan and Multi-Jurisdictional Hazard Mitigation Plan: 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. Therefore, no new impacts would occur.

- 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 that could interfere with the plan

- 9(f)(v) Dam Evacuation Plan: The project site is not located within a dam inundation zone

As previously discussed, the GPU EIR determined impacts from emergency response and evacuation plans to be less than significant with mitigation. As the project site is not one contemplated to result in an impact associated with adopted emergency response plan or emergency evacuation plan, no new impacts would occur. As the project would have a would have a less than significant impact for the reasons detailed above, the Project would be consistent with the analysis in the GPU EIR because it would not create new impacts, increase impacts, and there is no new information of substantial importance than identified within the GPU EIR.

- 9(g) The GPU EIR concluded this impact to be significant and unavoidable. The Project is within the Local Responsibility Area (LRA) and within the Urban-Wildlife Interface 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, water supply, and defensible space specified in the Consolidated Fire Code for the 16 Fire Protection Districts in San Diego County. Implementation of these fire safety standards would occur during the grading permit and/or building permit process. In addition, a fire hydrant would be constructed at Via Terramo and the proposed cul de sac for the Project. Additionally, to satisfy the five-minute fire response time requirement, fire protection services will be provided by the Escondido Fire Department through an Automatic Aid Agreement. This agreement is necessary to mitigate the extended response time, approximately eight minutes from the nearest San Marcos Fire Department station.

Consistent with GPU EIR Mitigation Measure Pub-1.5, which requires discretionary projects to demonstrate that adequate fire protection services and acceptable emergency response times are available, the Project will obtain an Automatic Aid Agreement with the Escondido Fire Department. This agreement is necessary because the nearest San Marcos Fire Protection District station has an estimated response time of approximately eight minutes, which exceeds the County's five-minute emergency response time standard. Through the Automatic Aid Agreement, the Escondido Fire Department will also provide fire protection services to the Project, ensuring compliance with the County's fire protection requirements. The Project is also consistent with GPU EIR Mitigation Measures Haz-3.3 and Haz-4.3, which require compliance with the Consolidated Fire Code, including emergency access, fire protection infrastructure, and site design features that reduce wildfire risk.

Therefore, based on the Project's location, review by County staff, and compliance with the Consolidated Fire Code, applicable Fire Authority requirements, and implementation of GPU EIR Mitigation Measures Pub-1.5, Haz-3.3, and Haz-4.3, the Project is not anticipated to expose people or structures to a significant risk of loss, injury, or death involving wildland fires. The Project would also not contribute to a cumulatively considerable wildfire impact because all past, present, and future development within the County is required to comply with the applicable fire protection regulations and General Plan fire protection policies.

As previously discussed, the GPU EIR determined cumulative wildfire impacts to be significant and unavoidable. However, the proposed Project would result in a less-than-significant project-level impact through compliance with the Consolidated Fire Code, applicable Fire Authority requirements, and implementation of the adopted GPU EIR mitigation measures identified above. Accordingly, the Project would not increase the severity of impacts identified in the GPU EIR and is consistent with the analysis and mitigation framework evaluated therein.

Implementation of GPU EIR Mitigation Measure Pub-1.5 (Project Condition):

Prior to Final Map approval, the applicant shall submit to the County Department of Planning & Development Services a signed Automatic Aid Agreement, or other documentation acceptable to the County and the Fire Authority Having Jurisdiction, demonstrating that fire protection services meeting the County's five-minute emergency response time standard will be provided to the Project. The agreement shall confirm that

the Escondido Fire Department will provide primary fire protection services to the Project site consistent with GPU EIR Mitigation Measure Pub-1.5 and Board Policy I-84.

To ensure compliance with the County's five-minute response time requirement, the applicant must obtain a signed Automatic Aid Agreement from the Escondido Fire Department confirming it will provide primary fire protection services to the project site. This agreement is necessary to address the extended response time from the nearest San Marcos Fire Department station. A copy of the signed agreement must be submitted to and approved by the County Department of Planning & Development Services prior to Final Map approval.

- 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). The stormwater quality basins associated with the Project are tied to a Priority Development Project Stormwater Quality Management Plan which requires maintenance and installation of engineered soil in order to prevent standing water within the basins. Also, the project does not involve or support uses that will produce or collect animal waste, such as equestrian facilities, agricultural operations (chicken coops, dairies etc.), solid waste facility or other similar uses. Therefore, the project will not substantially increase current or future resident's exposure to vectors, including mosquitoes, rats, or flies.

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, the following findings can be made:

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

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
10. Hydrology and Water Quality – Would the Project:			
a) Violate any waste discharge requirements?	☐	☐	☐
b) Is the project tributary to an already impaired water body, as listed on the Clean Water Act Section 303(d) list? If so,	☐	☐	☐

could the project result in an increase in any pollutant for which the water body is already impaired?

c) Could the proposed project cause or contribute to an exceedance of applicable surface or groundwater receiving water quality objectives or degradation of beneficial uses?

☐☐☐

d) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?

☐☐☐

e) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?

☐☐☐

f) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

☐☐☐

g) Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems?

☐☐☐

h) Provide substantial additional sources of polluted runoff?

☐☐☐

i) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map, including County Floodplain Maps?

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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?

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m) Inundation by seiche, tsunami, or mudflow?

☐☐☐

Discussion

The following Technical Studies were prepared for the Project related to hydrology and water quality:

- Priority Development Project (PDP) Stormwater Quality Management Plan (SWQMP) prepared by ABI Engineering, dated March 10, 2026.

The following responses have incorporated the analysis from the report.

- 10(a) The GPU EIR concluded this impact to be significant and unavoidable. The Project will require a National Pollutant Discharge Elimination System (NPDES) General Permit for Discharges of Storm Water Associated with Construction Activities. A Priority Development Project Stormwater Quality Management Plan (SWQMP) was prepared for the project by ABI Engineering dated March 10, 2026. The SWQMP demonstrates that the project would comply with all requirements of the Watershed Protection Ordinance (WPO). The project will be required to implement a combination of site design measures, source control BMPs, and structural BMPs to reduce potential pollutants and address hydromodification impacts to the maximum extent practicable. As part of this strategy, the project includes a biofiltration basin designed to treat stormwater runoff from impervious surfaces associated with project operations. The basin contains engineered soil media that facilitates pollutant removal and is subject to ongoing maintenance requirements. All proposed BMPs are detailed in the approved Priority Development Project SWQMP and will be reviewed for conformance with applicable regulations during subsequent construction permitting, including review of the Major Grading Permit. These measures ensure compliance with waste discharge requirements under the San Diego Municipal Permit, as implemented through the County's BMP Design Manual.

In addition to compliance with the County's WPO, this project is subject to the State Construction General Permit (Order No. 2009-0009-DWQ) issued by the California State Water Resources Control Board, as it involves disturbance of more than one acre of land. As such, the project is required to file a Notice of Intent (NOI) and prepare and implement a Storm Water Pollution Prevention Plan (SWPPP). These measures, in conjunction with the project's Priority Development Project Stormwater Quality Management Plan (SWQMP), will ensure compliance with applicable waste discharge requirements under the San Diego Municipal Separate Storm Sewer System (MS4) Permit, as implemented through the County's BMP Design Manual.

- 10(b) The GPU EIR concluded that impacts to water quality could be significant and unavoidable at a programmatic level due to the cumulative degradation of regional watersheds. The proposed project is located within the Bonsall sub-basin (903.12) of the San Luis Rey Hydrologic Unit, a watershed partially identified as impaired under Clean Water Act Section 303(d). Pollutants of concern in the San Luis Rey River watershed include nutrients, salinity, and phosphorous, primarily associated with agricultural and urban runoff. In compliance with the County's WPO and consistent with Hyd-1.2 through Hyd-1.5 of the GPU EIR, the project will implement a suite of Low Impact Development (LID) strategies, source control measures, and structural BMPs designed to treat stormwater runoff and minimize pollutant discharge to the maximum extent practicable.

Specifically, the project will incorporate a biofiltration basin with engineered media to treat runoff collected from impervious surfaces, as detailed in the approved Priority Development Project SWQMP. The SWQMP ensures compliance with the San Diego Regional MS4 Permit, as implemented through the County's BMP Design Manual and reviewed during final engineering and issuance of a Major Grading Permit. With these

measures in place, the proposed project would result in a less than significant impact to water quality standards, as it will not contribute additional or unmitigated pollutant loads to downstream receiving waters. Therefore, while the GPU EIR concluded that cumulative water quality impacts could be significant, the proposed project would be consistent with the GPU EIR analysis and would not result in impacts beyond those previously evaluated.

- 10(c) The GPU EIR concluded that impacts to water quality standards and groundwater resources could be significant and unavoidable at a regional, programmatic level. Potential pollutant sources associated with the proposed project include runoff from impervious surfaces, such as driveways and parking areas, and minor urban contaminants typical of residential development. Although the project does not include fuel dispensing areas or underground storage tanks, potential pollutants such as trash, sediments, nutrients, and hydrocarbons from vehicular activity are addressed through the implementation of comprehensive site design measures, source control BMPs, and a biofiltration basin as detailed in the approved Priority Development Project SWQMP.

The biofiltration basin is designed with engineered soil media to treat stormwater runoff before it leaves the site, reducing pollutants to the maximum extent practicable in compliance with the WPO, the County's BMP Design Manual, and the San Diego Municipal Separate Storm Sewer System (MS4) Permit. These features will be reviewed again during final engineering and issuance of the Major Grading Permit. The project does not involve direct groundwater extraction, and infiltration BMPs were not proposed due to underlying geologic constraints and soil limitations. However, the combination of non-infiltrating LID BMPs and hydrologic source control still ensures protection of downstream water quality.

As discussed in prior responses, while the GPU EIR identified significant and unavoidable impacts to water quality and groundwater at a programmatic scale, the proposed project includes mitigation and regulatory compliance measures (Hyd-1.2 through Hyd-1.5) that reduce impacts to a less than significant level at the project scale. Therefore, the project is consistent with the GPU EIR's analysis and would not result in an increase in the severity of impacts identified in the County's GPU EIR.

- 10(d) The GPU EIR concluded this impact to be significant and unavoidable. The Project does not propose the use of groundwater and would obtain water service from Vallecitos Municipal Water District as detailed in Service Availability Forms dated December 2022. 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 that impacts related to erosion and siltation could be less than significant with mitigation. As outlined in the approved SWQMP and described in responses 10(a) and 10(b), the project will implement temporary construction-phase Best Management Practices (BMPs) to control sediment and erosion and reduce the potential for pollutants to enter stormwater runoff to the maximum extent practicable. These measures include site perimeter controls, temporary soil stabilization, and proper materials handling during grading and construction.

Site preparation will involve approximately 96 cubic yards of cut and 16,019 cubic yards of fill, as detailed in the grading plan and supported by the Preliminary Geotechnical Investigation prepared by ABI Engineering. The project site contains existing commercial development, and the land has been previously disturbed, although the precise date of initial grading is not known. The majority of new grading will occur in the rear portion of

the property, where fill slopes will be reshaped and retaining walls installed to provide slope stability and support site improvements. Furthermore, a CEQA Drainage Study Report (ABI Engineering Consultants, Inc., March 11, 2026, confirms that the project will not increase off-site drainage or flow volumes, and will maintain consistency with existing drainage patterns.

Accordingly, the project will not substantially alter existing drainage conditions or contribute to downstream erosion or siltation. While the GPU EIR identified significant and unavoidable cumulative impacts to erosion and sedimentation, the proposed project includes mitigation measures consistent with Hyd-1.2 through Hyd-1.5, including compliance with the WPO and County BMP Design Manual, resulting in a less than significant impact at the project level. Therefore, the project would be consistent with the analysis provided in the GPU EIR and would not increase the severity of impacts previously identified.

- 10(f) The GPU EIR concluded that impacts related to erosion and siltation would be less than significant with mitigation. As outlined in the project's SWQMP and in responses 10(a) and 10(b), the project will implement temporary construction-phase BMPs to minimize sediment transport and other pollutants during grading and earthwork activities. These measures will reduce pollutants to the maximum extent practicable in compliance with the Watershed Protection Ordinance (WPO) and the San Diego Regional Municipal Separate Storm Sewer System (MS4) Permit, as implemented through the County's BMP Design Manual.

As determined in the project's Priority Development Project Stormwater Quality Management Plan (ABI Engineering Consultants, Inc. 2026), the project would route onsite runoff through a lined biofiltration planter box that would reduce the unmitigated 100-year peak flow rate from 5.69 cubic feet per second (cfs) to a controlled post-project release of 2.45 cfs. The project site previously contained a single-family residence, which has since been demolished. The majority of grading will occur in the rear portion of the site, primarily in areas designated for fill slopes, and will include the construction of retaining walls to stabilize proposed slopes and support future improvements.

Additionally, the CEQA Drainage Study Report (ABI Engineering Consultants, Inc., 2026), demonstrates that the project will not increase off-site drainage or flow volumes, and that the proposed development will maintain consistency with pre-existing hydrologic conditions. The project site is not located within a 100-year floodplain, and no encroachment into flood-prone areas is proposed. Therefore, the project would not substantially alter the existing drainage pattern of the area or contribute to significant erosion or siltation.

While the GPU EIR identified erosion and sedimentation impacts as less than significant with mitigation, the proposed project incorporates measures consistent with Mitigation Measures Hyd-1.2 through Hyd-1.5, ensuring conformance with applicable local and state water quality regulations. Accordingly, the project would result in a less-than-significant impact and would be consistent with the analysis and conclusions of the GPU EIR, as it would not increase the severity or extent of previously identified impacts.

- 10(g) The GPU EIR concluded this impact to be less than significant with mitigation. As determined in the CEQA Drainage Study Report (ABI Engineering Consultants, Inc. 2026), the existing 100-year peak flow rate is approximately 2.92 cubic feet per second (cfs). With implementation of the proposed biofiltration planter box, the project's mitigated peak

flow rate would be reduced to approximately 2.45 cfs. Therefore, the project would not contribute runoff water that would exceed the capacity of the existing stormwater drainage system.

As previously discussed, the GPU EIR determined impacts related to exceeding the capacity of stormwater systems to be less than significant with mitigation. With implementation of the proposed stormwater BMPs, the project would have a less-than-significant impact. Therefore, the project would be consistent with the analysis in the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance other than the information identified in the GPU EIR.

- 10(h) The GPU EIR concluded that impacts to water quality standards could be significant and unavoidable at a regional scale due to cumulative degradation of surface waters. For the proposed project, potential pollutant sources primarily include runoff from impervious surfaces, such as driveways, parking areas, and common landscaped areas. The project does not include fuel dispensing areas or underground storage tanks. As identified in the SWQMP prepared by ABI Engineering, source control measures will be implemented, including covered and maintained trash enclosures, storm drain inlet stenciling, and proper site maintenance procedures to minimize potential pollutant exposure.

As detailed in responses 10(a) and 10(b), the project incorporates a combination of site design strategies, source control measures, and a biofiltration basin as a structural BMP to treat stormwater runoff before it leaves the site. These features are consistent with the requirements of the WPO and the County's BMP Design Manual, and will reduce pollutant discharges to the maximum extent practicable.

Although the GPU EIR identified water quality impacts as significant and unavoidable in a cumulative context, the proposed project would result in a less-than-significant impact to water quality standards at the project level with implementation of project-specific measures outlined in the SWQMP and listed in response 10(a). These measures are consistent with mitigation strategies Hyd-1.2 through Hyd-1.5 identified in the GPU EIR. Therefore, the proposed project would be consistent with the GPU EIR analysis, as it would not increase the severity or extent of water quality impacts previously evaluated.

- 10(i) The GPU EIR concluded that impacts related to housing within a 100-year flood hazard area would be less than significant with mitigation. The proposed project includes new residential development, but the project site is not located within a 100-year floodplain or designated floodway, and no development is proposed within such areas. Therefore, the risk of exposing people or structures to flood hazards, including flooding from levee or dam failure, is minimal.

As previously discussed, the GPU EIR determined that such impacts could be mitigated to a less-than-significant level through appropriate site planning and compliance with applicable floodplain regulations. Because the proposed project is outside of a designated flood hazard area and complies with all local drainage and site design requirements, it would result in a less-than-significant impact. Therefore, the project would be consistent with the analysis provided in the GPU EIR, as it would not increase the severity of impacts previously identified.

- 10(j) The GPU EIR concluded that impacts related to placement of structures within a 100-year flood hazard area would be less than significant with mitigation. The proposed project involves residential development, but the project site is not located within a designated

100-year floodplain or regulatory floodway. As confirmed in the SWQMP prepared by ABI Engineering, the project has been designed to maintain existing drainage patterns and will not result in significant alteration of flows.

Because the project does not propose any construction within a 100-year flood hazard area and incorporates drainage measures that avoid redirection or impediment of flood flows, it would not result in the placement of structures that would impede or redirect floodwaters. Therefore, the project would result in a less-than-significant impact under this criterion and would be consistent with the analysis and conclusions of the GPU EIR.

- 10(k) The GPU EIR concluded that impacts related to flood hazards would be less than significant with mitigation. The proposed construction associated with the project lies outside of any identified special flood hazard area, including 100-year floodplains or designated floodways. The project proposes residential development, and no residential structures will be placed within areas subject to flooding.

Additional information related to the project's analysis of flood hazards is provided in response 10(j). For the reasons outlined above, the proposed project would result in a less-than-significant impact with respect to flood hazard exposure and would be consistent with the analysis provided in the GPU EIR, as it would not increase the severity of impacts previously identified.

- 10(l) The GPU EIR concluded that impacts related to exposure to inundation from dam or levee failure would be less than significant with mitigation. The County Office of Emergency Services maintains Dam Evacuation Plans for each dam operational area, which include details on affected jurisdictions, evacuation routes, physical constraints, and procedures for emergency response. If a unique institution, such as a hospital, school, or retirement facility, is proposed within a mapped dam inundation area, an amendment to the applicable evacuation plan may be required.

However, as discussed in response 10(j), the project site lies outside of any mapped dam inundation area associated with major dams or reservoirs in San Diego County. Therefore, the proposed residential development would not expose people or structures to a significant risk of loss or injury due to dam failure, and the project would result in a less-than-significant impact consistent with the findings of the GPU EIR.

- 10(m) The GPU EIR concluded this impact to be less than significant with mitigation because portions of the County would be located within areas affected by seiche, tsunami and/or mudflow hazards. For these projects, mitigation measures would be required consistent with the GPU Mitigation Framework.

- 10(m)(i) SEICHE: According to the County's Guidelines for Determining Significance Hydrology and Water Quality, land within the County is unlikely to experience inundation due to a seiche (County of San Diego 2021). Further, the project site is not located adjacent to a large body of water. Therefore, no new impacts would occur

- 10(m)(ii) TSUNAMI: According to the County of San Diego Guidelines for Determining Significance Hydrology and Water Quality, land within the County is unlikely to experience inundation due to a tsunami (County of San Diego 2021). Further, the project site is not located in a tsunami hazard zone (California DOC 2025c). Therefore, no new impacts would occur..

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

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

Conclusion

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

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

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

Discussion

11(a) The GPU EIR concluded this impact to be less than significant with mitigation. The proposed project entails the subdivision of a 1.98-acre parcel into ten single-family residential lots through a Tentative Map application, located at 1434 Montiel Road in the North County Metropolitan Subregional Plan area. The proposed lot sizes and subdivision design are similar to the development in the surrounding area. The site was previously developed with a single-family residence, which has since been demolished, and is now vacant. The project does not involve the introduction of major new infrastructure, such as arterial roadways or regional utility corridors, that would divide or fragment surrounding development. Access to the proposed lots will be provided by a new cul-de-sac off Via Teramo, a private road that connects to Montiel Road, a public street, allowing for appropriate internal circulation.

As previously discussed, the GPU EIR determined that potential impacts related to the division of an established community could be mitigated to a less-than-significant level when development is consistent with surrounding land use patterns and adopted plans. The proposed project aligns with the site's Village Residential (VR-7.3) General Plan designation and Single Family Residential (RS) zoning. It is located within an area planned for higher-density village residential uses. Therefore, the project would result in a less-than-significant impact regarding the physical division of an existing community and would be consistent with the analysis and findings of the GPU EIR, as it would not increase the severity or scope of impacts previously identified.

- 11(b) The GPU EIR concluded that impacts related to conflicts with land use plans, policies, and regulations would be less than significant. The proposed project would subdivide a 1.98-acre parcel into 10 single-family residential lots through a Tentative Map, which is consistent with the Village Residential (VR-7.3) land use designation under the General Plan and the site's Single Family Residential (RS) zoning. The discretionary action associated with the project is a Tentative Map. The project site was previously developed with a single-family home, which has since been demolished, and the new development reflects the density anticipated by the General Plan.

As previously discussed in response 11(a), the project would be consistent with the General Plan's allowed density and zoning standards and has been accounted for in the GPU EIR's regional growth and land use projections. Therefore, the proposed project would result in a less-than-significant impact with respect to land use compatibility and consistency and would be consistent with the analysis provided in the GPU EIR, as it would not increase the scope or severity of impacts previously identified.

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

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

a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☐

- 12(a) The GPU EIR determined that impacts to mineral resources would be significant and unavoidable. The California Surface Mining and Reclamation Act (SMARA) required classification of land into Mineral Resource Zones (MRZs). The Project site has not 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 for mineral resources. The Project site is primarily classified as a developed and commercially zoned land adjacent to commercial and residential uses. The Project site is also directly adjacent to Interstate 15 and near the State Route 78 and Interstate 15 Interchange. 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. Additionally, the Project site is less than 5 acres and in between a highway and residential uses and it would be unlikely to support a successful mining operation. Therefore, implementation of the Project will 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 determined that impacts to mineral resources could be significant and unavoidable at a regional level due to the potential long-term loss of access to mineral resource areas. However, the project site is not located within an area classified by the California Department of Conservation as containing known or potentially significant mineral resources, such as Mineral Resource Zones (MRZs). According to the Update of Mineral Land Classification: Aggregate Materials in the Western San Diego Production-Consumption Region (1997), the site is not mapped within any MRZ-2 or MRZ-3 classification, and no mineral extraction activities have occurred or are proposed for the site.

Furthermore, the surrounding land uses are urbanized and incompatible with future mineral extraction, making resource recovery impractical even if potential deposits were present. Therefore, implementation of the project would not result in the loss of availability of a known or locally important mineral resource.

As previously discussed, while the GPU EIR identified potential mineral resource impacts as significant and unavoidable in broader contexts, the proposed project would result in a less-than-significant impact with respect to mineral resources at the site-specific level. The project would therefore be consistent with the analysis provided in the GPU EIR, as it would not increase the severity or extent of impacts previously identified.

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. The GPU EIR concluded significant and unavoidable impacts to mineral resources, however, the Project would have less than significant impacts for the reasons detailed above. Therefore, the Project would not result in an impact which was not adequately evaluated by the GPU EIR.

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

a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☐
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☐
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	☐
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	☐
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐
f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐

Discussion

13(a) The GPU EIR concluded this impact to be less than significant with mitigation. The area surrounding the Project site consists primarily of single-family residential uses. The proposed Project would subdivide a 1.98-acre site into 10 single-family residential lots and would not expose people to potentially significant noise levels that exceed the allowable limits of the General Plan, Noise Ordinance, or other applicable standards, for the following reasons:

General Plan – Noise Element:

Policy 4b of the General Plan Noise Element establishes that noise-sensitive land uses, including residential development, should not be exposed to ambient noise levels exceeding 60 Community Noise Equivalent Level (CNEL). The Project site is located near Interstate 15 and State Route 78, where existing noise levels exceed 60 CNEL. However, according to the Noise Study prepared for the Project by Eilar Associates, modeled future exterior noise levels for all proposed residential lots would be below the County's 60 CNEL

threshold, with the maximum modeled level at 58.1 CNEL. Therefore, no noise mitigation such as barriers or enhanced building materials is required to achieve compliance with the General Plan Noise Element for outdoor use areas. As a residential project, noise occasionally generated by future occupants (e.g., landscape equipment or pets) is expected to fall within normal residential activity levels and would be governed by the County Noise Ordinance. Therefore, the Project would not expose existing or planned noise-sensitive areas to noise in excess of 60 dBA CNEL.

Noise Ordinance – Section 36.404:

Operational noise associated with the Project would consist of typical residential activities such as vehicle trips, HVAC systems, and landscaping equipment. These activities are consistent with surrounding residential uses and would be subject to the County Noise Ordinance limits (50 dBA daytime and 45 dBA nighttime at the property line). No commercial or industrial noise-generating uses are proposed. Therefore, operational noise would comply with Section 36.404 of the County Noise Ordinance and would not result in significant impacts.

Noise Ordinance – Section 36.410:

Temporary construction noise is subject to the County's 75 dBA eight-hour average limit at the property line of any occupied residence. According to the Noise Study prepared by Eilar Associates, worst-case construction noise levels would range from approximately 63.7 dBA during grading to 70.1 dBA during building construction at the nearest receptor, which are below the County's 75 dBA threshold. Construction activities will occur only during permitted hours (7 AM to 7 PM, Monday through Saturday), and no activities such as blasting or pile driving are proposed. The Project will also implement the following standard best management practices to further reduce temporary construction noise:

- Turn off equipment when not in use.
- Maintain equipment in proper working condition, with secure loads.
- Use equipment with effective mufflers.
- Minimize the use of backup alarms.
- Locate staging areas away from noise-sensitive occupied areas.

As previously discussed, the GPU EIR determined that impacts from excessive noise levels would be less than significant with mitigation. The proposed Project would result in a less-than-significant noise impact through compliance with County standards and incorporation of design features and standard practices. Therefore, the Project would be consistent with the analysis provided within the GPU EIR, as it would not increase the severity of previously identified impacts.

- 13(b) The GPU EIR concluded this impact to be less than significant with mitigation. The Project proposes residential uses and does not include vibration-intensive activities such as pile driving or heavy compaction. The Noise Study prepared by Eilar Associates, dated August 13, 2024 confirms that construction activities are not expected to generate excessive groundborne vibration and that vibration impacts would be less than significant. The Project does not propose any blasting or rock crushing during the grading operations. In addition, Project operation does not involve any vibration-producing equipment that would exceed applicable vibration levels at the adjoining property line.

As previously discussed, the GPU EIR determined impacts from excessive groundborne vibration to be less than significant with mitigation. However, the Project would have a less-than-significant impact with no required mitigation for the reasons detailed above.

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

- 13(c) The GPU EIR concluded this impact to be less than significant with mitigation. As indicated in the response listed under Section 13(a), the project would not expose existing or planned noise-sensitive areas to a substantial permanent increase in ambient noise levels that exceed the allowable limits of applicable noise standards. According to the Noise Study prepared by Eilar Associates, project-related traffic and typical residential activities would not generate a measurable increase in community noise levels when compared to existing ambient conditions. Additionally, the Noise Study confirms that operation of residences included in the project would not result in an increase of 10 dB CNEL or more, which is the threshold typically considered to represent a substantial increase in ambient noise.

As previously discussed, the GPU EIR determined that impacts from permanent increases in ambient noise levels would be less than significant with mitigation. Because the proposed project would result in a less-than-significant increase in long-term noise and complies with General Plan Noise Element standards, it would be consistent with the analysis provided in the GPU EIR and would not increase the severity of impacts previously identified.

- 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. As discussed in Section 13(a), construction activities associated with the project would comply with noise level limits from the County's Noise Ordinance; therefore, temporary increases in noise levels from construction activities would be less than significant. With implementation of this measure, blasting activities would comply with noise level limits from the County's Noise Ordinance.

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 specific Project conditions (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 proposed project is located within the boundaries of the McClellan-Palomar Airport Influence Area, as identified in the McClellan-Palomar ALUCP. The project proposes a 10-lot residential subdivision, which is a compatible land use under the applicable ALUCP policies. Therefore, the project does not trigger any additional airport-related conditions or restrictions. Additionally, the project does not propose the construction of any structure equal to or greater than 150 feet in height, and would therefore not constitute a safety hazard to aircraft operations associated with any nearby public or private airports or heliports.

As previously discussed, the GPU EIR determined that impacts related to airport land use compatibility and safety could be mitigated to a less-than-significant level. Since the proposed project is consistent with the McClellan-Palomar ALUCP and does not involve features that would pose a hazard to airport operations, the project would be consistent with the analysis provided in the GPU EIR and would not increase the severity or scope of impacts previously identified.

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

Conclusion

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

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

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

Discussion

- 14(a) The GPU EIR concluded this impact to be less than significant. The project site is designated in the General Plan as VR-7.3 and is zoned RS. The proposed project would subdivide a 1.98-acre site into ten single-family residential lots, which is consistent with the allowable density under the General Plan and zoning regulations. The development of this site was anticipated in the GPU and is located within an area planned for higher-density village-scale residential uses. The project does not propose any physical or regulatory changes that would remove growth restrictions or induce population growth beyond what has already been planned. It does not involve the extension of major infrastructure into undeveloped areas, and no amendments to the General Plan or zoning ordinance are required to accommodate the project.

As previously discussed, the GPU EIR determined that impacts related to population growth would be less than significant when projects align with planned growth areas and adopted land use designations. Therefore, the proposed project would result in a less-

than-significant impact and would be consistent with the analysis provided within the GPU EIR, as it would not increase the scope or severity of impacts previously identified.

- 14(b) The GPU EIR concluded this impact to be less than significant. The Project would not displace significant numbers of existing housing. The Project would develop 10 single-family residential lots on land which is currently vacant and undeveloped. 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. The project site previously contained a single-family residence, which has since been removed. The proposed project would develop the site with ten new single-family residential lots, resulting in a net increase in available housing. Because only one unit was previously present on the site, the project does not displace a substantial number of people, and replacement housing would not be required elsewhere.

As previously discussed, the GPU EIR determined that impacts related to the displacement of people or housing would be less than significant. The proposed project would result in a less-than-significant impact and would be consistent with the analysis provided within the GPU EIR, as it would not increase the scope or severity of impacts previously identified.

Conclusion

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

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

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

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

☐	☐	☐
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protection, police protection, schools, parks, or other public facilities?

Discussion

Service availability forms were prepared for the Project for water and sewer services, fire protection and schools. The following responses have incorporated these forms.

- 15(a) The GPU EIR concluded this impact to be less than significant with mitigation, with the exception of school services, which remained significant and unavoidable at a regional level. The proposed project involves the subdivision of a 1.98-acre parcel into ten single-family residential lots. Public services for the site, including water and sewer, will be provided by the Vallecitos Water District, which has confirmed adequate service availability for the proposed development.

The project site is located within the San Marcos Fire Protection District, but lies outside the district's required five-minute emergency response time. To address this, the applicant is required to obtain a signed Automatic Aid Agreement from the Escondido Fire Department, confirming that Escondido Fire will provide primary fire protection services to the site. This agreement is necessary to meet the County's emergency response time standard and must be approved by the Department of Planning & Development Services prior to Final Map approval.

The project also lies within the San Marcos Unified School District, which has confirmed availability of school services in the completed PDS-399SC School Service Availability Form. While the GPU EIR determined that impacts to school services at the countywide scale could be significant and unavoidable due to cumulative enrollment pressures, this individual project would not require new or expanded school facilities beyond those already planned.

The project does not propose the construction of any new or expanded public service facilities—such as fire stations, schools, sheriff substations, or parks—to maintain acceptable service ratios, response times, or other performance standards. The proposed development is consistent with General Plan growth projections and land use designations, and its public service impacts have already been considered in the GPU EIR. Therefore, with implementation of the Automatic Aid Agreement and confirmation of school, water, and sewer services, the project would result in a less-than-significant impact to public services and would be consistent with the analysis provided in the GPU EIR.

Conclusion

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

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

4. Feasible mitigation measures from the GPU EIR (Pub-3.2) would be applied to the project. This mitigation measure, as detailed above, requires the project to conform to Board Policy I-84, which requires project Facility Availability and Commitment for Public Sewer, Water, School and Fire Services.

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

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

☐☐☐

b) Does the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?

☐☐☐

Discussion

16(a) The GPU EIR concluded this impact to be less than significant with mitigation. The Project 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 a major grading plan for future residential development. To avoid any physical deterioration of local recreation facilities, the Project would be required to pay park fees prior to building permit issuance.

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

16(b) The GPU EIR concluded this impact to be less than significant with mitigation. The Project does not include recreational facilities or require the construction or expansion of recreational facilities. Therefore, the Project would have a less than significant impact from the construction or expansion of recreational facilities.

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

Conclusion

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

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

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

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

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

☐☐☐

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?

☐☐☐

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?

☐☐☐

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

☐☐☐

e) Result in inadequate emergency access?

☐☐☐

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

☐☐☐

Discussion

17(a) The GPU EIR concluded this impact to be significant and unavoidable. The proposed project consists of the subdivision of a 1.98-acre parcel into 10 single-family residential lots, which will generate 100 Average Daily Trips (ADT) with 8 AM and 10 PM peak hour trips.. Due to the limited number of daily and peak-hour vehicle trips, the project would not create a conflict with any applicable plan, ordinance, or policy establishing measures of effectiveness for the circulation system because the addition of project traffic would not cause the circulation system to degrade below standards established in the GPU EIR.

The County standard for Mobility Element roads is Level of Service (LOS) D. Surrounding roadway segments and intersections would continue to operate at acceptable levels with implementation of the project. If any surrounding roadway segments or intersections currently operate below acceptable level, the number of project trips would be within the allowable limits per the County's 2011 Guidelines for Determining Significance and Report Format and Content Requirements for Transportation and Traffic that accompanied the 2011 General Plan. The project would not result in a substantial increase in the number of vehicle trips, volume-to-capacity ratios, or congestion at nearby intersections relative to existing conditions. Therefore, the project would not conflict with applicable circulation system performance standards.

The North County Transit District provides transit service to the project area. The nearest transit stop is located on nearby public roadways and would remain accessible to future residents. The project would not adversely affect transit operations or access to transit services. Existing pedestrian and bicycle facilities serving the surrounding area would remain available, and the project would provide pedestrian connectivity consistent with County standards. Therefore, the project would not result in a conflict with transit, pedestrian, or bicycle facilities.

As previously discussed, the GPU EIR determined significant and unavoidable impacts related to policies establishing measures of effectiveness for the performance of the circulation system. However, the project would have a less-than-significant impact for the reasons stated above. The project would be consistent with the analysis contained in the GPU EIR because it would not create new impacts or substantially increase the severity of impacts previously identified, and there is no new information of substantial importance beyond that considered in the GPU EIR.

- 17(b) The GPU EIR concluded this impact to be significant and unavoidable. The GPU EIR includes policies in the Land Use and Mobility Elements that address traffic operations, congestion management, and transportation system performance. Relevant General Plan policies include LU-5.1, LU-10.4, LU-11.8, LU-12.2, M-1.1, M-1.2, M-1.3, M-2.1, M-2.2, M-2.3, M-3.1, M-3.2, M-4.2, M-5.1, M-5.2, M-9.1, and M-9.2. These policies promote the reduction of vehicle trips, encourage efficient land use patterns and alternative transportation, require development to mitigate significant impacts to transportation facilities where feasible, establish appropriate roadway standards, and maintain acceptable transportation system performance.

General Plan Policy M-2.1 establishes the County's level of service (LOS) standard for Mobility Element roads. Policy M-2.1 requires development projects to provide roadway improvements or fair-share contributions, where applicable, necessary to achieve LOS D or better on Mobility Element roads, except where a failing LOS has been accepted by the County pursuant to the criteria identified in the General Plan. Where a failing LOS has been accepted, feasible mitigation is required in the form of roadway improvements or fair-share contributions consistent with the Mobility Element roadway network.

As discussed under Section 17(a), the proposed Project would generate approximately 100 average daily trips (ADT) and would not substantially increase traffic volumes on the surrounding roadway network. Due to the limited scale of development, surrounding roadway segments and intersections would continue to operate at acceptable levels. If any surrounding roadway segment or intersection currently operates below the County's LOS standard, the Project's traffic generation would remain within the allowable limits established by the County's 2011 Guidelines for Determining Significance and Report

Format and Content Requirements for Transportation and Traffic applicable to General Plan-consistent projects.

In addition to the applicable General Plan policies, the GPU EIR identifies mitigation measures that partially reduce the significant and unavoidable cumulative transportation impacts. The mitigation measures applicable to the Project include:

- **GPU EIR Mitigation Measure Tra-1.3**, which requires implementation of the County Public Road Standards during review of discretionary development projects. This measure ensures that roadway improvements and design standards are implemented, where applicable, to maintain safe and efficient operation of the transportation system.
- **GPU EIR Mitigation Measure Tra-1.4**, which requires implementation of the County Guidelines for Determining Significance for Transportation and Traffic to evaluate transportation impacts and require mitigation where significant impacts are identified. This measure ensures that appropriate roadway improvements and transportation measures are incorporated into projects where necessary.
- **GPU EIR Mitigation Measure Tra-1.7**, which requires implementation of the County Transportation Impact Fee (TIF) Ordinance to help fund planned transportation facilities needed to accommodate future growth. The Project will pay all applicable Transportation Impact Fees, thereby contributing its fair share toward planned regional transportation improvements.

The Project has been reviewed for consistency with the County Public Road Standards (GPU EIR Mitigation Measure Tra-1.3), will comply with the County Guidelines for Determining Significance for Transportation and Traffic (GPU EIR Mitigation Measure Tra-1.4), and will pay all applicable Transportation Impact Fees pursuant to the County Transportation Impact Fee Ordinance (GPU EIR Mitigation Measure Tra-1.7).

The designated congestion management agency for San Diego County is SANDAG. In October 2009, the San Diego region elected to be exempt from the State Congestion Management Program and has since complied with the federal congestion management process pursuant to 23 CFR 450.320.

Since certification of the GPU EIR, CEQA Guidelines Section 15064.3 was amended to establish vehicle miles traveled (VMT), rather than level of service, as the metric for evaluating transportation impacts under CEQA. Consistent with the County's updated Transportation Study Guide and Guidelines for Determining Significance, the proposed Project qualifies for screening from a detailed VMT analysis due to its limited scale and trip generation. As discussed in Section 17(a), the Project would not result in a significant direct or cumulative VMT impact, and no VMT mitigation is required. Because the GPU EIR was certified prior to passage of SB 743, the County Guidelines for Determining Significance for Transportation and Traffic applicable to General Plan-consistent projects remain the August 24, 2011, Guidelines prepared to analyze traffic and transportation and mitigate any significant effects of projects consistent with the General Plan

The Project is consistent with the applicable General Plan transportation policies and would implement the relevant and feasible mitigation measures identified in the GPU EIR. Therefore, the Project would not conflict with an applicable congestion management program or other standards established by the County congestion management agency.

The Guidelines for Determining Significance for Transportation and Traffic (August 24, 2011) are the applicable guidelines and standards associated with projects consistent with

the General Plan. GPU EIR Mitigation Measure Tra-1.4 requires implementation of these Guidelines to evaluate transportation impacts and require mitigation where significant impacts are identified. Following the adoption of Senate Bill 743 and CEQA Guidelines Section 15064.3, the County updated its transportation significance guidelines to evaluate transportation impacts using VMT rather than LOS under CEQA. Consistent with CEQA Guidelines Section 15183, General Plan-consistent projects continue to rely on the GPU EIR analysis and the County's adopted transportation review procedures to ensure project-specific transportation impacts are addressed.

CEQA Guidelines Section 15183 provides that projects consistent with the development density established by the General Plan generally do not require additional environmental review except as necessary to examine whether the project would result in project-specific effects that are peculiar to the project or its site. Because the Project is consistent with the General Plan, would implement the applicable General Plan transportation policies, would comply with the County's transportation review requirements, and would implement GPU EIR Mitigation Measures Tra-1.3, Tra-1.4, and Tra-1.7, the Project would not result in new or more severe transportation impacts than those evaluated in the GPU EIR.

As previously discussed, the GPU EIR concluded this impact to be significant and unavoidable. However, because the Project would comply with applicable General Plan policies, the County Public Road Standards, the County Guidelines for Determining Significance for Transportation and Traffic, and would pay all applicable Transportation Impact Fees pursuant to the County Transportation Impact Fee Ordinance, the Project would not create new impacts, increase the severity of impacts identified in the GPU EIR, or result in new information of substantial importance beyond that identified in the GPU EIR. Accordingly, the Project would be consistent with the analysis contained in the GPU EIR.

- 17(c) The GPU EIR concluded this impact to be less than significant with mitigation. The proposed project site is located within the McClellan-Palomar Airport Influence Area, as identified in the McClellan-Palomar ALUCP. The project proposes a ten-lot single-family residential subdivision, which is a compatible land use under the ALUCP. The project does not propose any structures equal to or greater than 150 feet in height and would therefore not pose a hazard to air traffic or interfere with established flight patterns. The site is not located within an Airport Safety Zone, Aviation Easement, or Overflight Notification Area as defined in County or ALUC mapping tools.

Therefore, the project would result in a less-than-significant impact to air traffic patterns or aviation safety and would be consistent with the analysis provided within the GPU EIR, as it would not increase the severity or extent of impacts previously identified.

- 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. The private would meet County design standards.

As previously discussed, the GPU EIR determined impacts on rural road safety to be significant and unavoidable. The project would have a less than significant impact as improvements would not result in changes to roadway design that would cause increased hazards. Therefore, the project would be consistent with the analysis in the GPU EIR

because it would not create new impacts or increase impacts, and there is no new information of substantial importance other than the information identified in the GPU EIR..

- 17(e) The GPU EIR concluded this impact to be less than significant with mitigation. The proposed project would not result in inadequate emergency access. According to the Preliminary Grading Plan prepared by ABI Consultants, Inc., the project includes construction of a private cul-de-sac ("Street A") that provides direct access to each of the ten proposed single-family residential lots. This cul-de-sac connects to Via Teramo, a private road that ultimately connects to Montiel Road, a public street. The grading plan confirms that the cul-de-sac will be constructed to a minimum width sufficient to meet the San Diego County Consolidated Fire Code, and no portion of the access route exceeds the maximum cumulative dead-end road length limits under applicable code standards.

Consistent with GPU EIR mitigation measure Tra-4.2, the project will implement applicable Building and Fire Code requirements to ensure safe and unobstructed access for emergency vehicles. With the implementation of these project design elements and adherence to current fire safety standards, the project would result in a less-than-significant impact to emergency access.

As previously discussed, the GPU EIR determined impacts to emergency access would be less than significant with mitigation. The proposed project is therefore consistent with the GPU EIR analysis, as it would not increase the severity or scope of impacts previously identified.

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

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

Conclusion

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

1. No peculiar impacts to the Project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. Feasible measures contained within the GPU EIR (Tra-1.4, Tra-1.7, and Tra-4.2, and) would be applied to the project. The mitigation measures, as detailed above, would require payment into the County TIF Program as well as consistency with the Building Code, Fire Code, and County Public Road Standards.

18. Tribal Cultural Resources

Would the Project:	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
a) Cause a substantial adverse change in the significance of a tribal cultural resource, as defined in Public Resources Code §21074 as either a site, feature, place, or cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:	☐	☐	☐
i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of Historical Resources as defined in Public Resources Code §5020.1(k), or			
ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code §5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code §5024.1, the Lead Agency shall consider the significance of the resource to a California Native American tribe.	☐	☐	☐

Discussion

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

18(a)

As discussed in the Negative Cultural Resources Survey Report for the 1434 Montiel Road Project (BFSA 2024), and Section 5, Cultural Resources, above, a County-approved archaeologist performed a pedestrian survey of the approximately 2.05-acre project site on January 5, 2024. The County-approved archaeologist was accompanied by a Luiseño Native American monitor from Saving Sacred Sites. No prehistoric or historic archaeological material was observed within the project APE during the survey. As a precautionary measure for any inadvertent discoveries and consistent with applicable General Plan EIR mitigation measures, including Mitigation Measure Cul-2.5, the project will be conditioned to include Archaeological and Tribal Monitoring, as well as a Cultural Resources Treatment Agreement and Preservation Plan throughout all grading activities.

Consistent with General Plan EIR Mitigation Measure Cul-2.4 and applicable tribal coordination requirements, the County initiated coordination with California Native American tribes traditionally and culturally affiliated with the project site on November 5, 2024. The Rincon Band of Luiseño Indians requested further discussion regarding the project, and the County met with the Rincon Band of Luiseño Indians on March 12, 2025, May 7, 2025, July 18, 2025, December 3, 2025, February 25, 2026, April 14, 2026, and June 16, 2026. No Tribal Cultural Resources were identified during discussions and coordination with the tribe. As such, there are no impacts to tribal cultural resources.

As previously stated, impacts to Tribal Cultural Resources analyzed within Section 2.5, Cultural and Paleontological Resources, of the GPU EIR were determined to be significant with mitigation. The project would implement measures consistent with the GPU EIR. 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 regard to the issue area of Tribal Cultural Resources, the following findings can be made:

- 1. No peculiar impacts to the project or its site have been identified.
- 2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
- 3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
- 4. Feasible mitigation measures contained within the GPU EIR (Cul-2.4, Cul-2.5, and Cul-2.6) would be applied to the project.

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
19. Utilities and Service Systems – Would the Project:			
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	☐	☐	☐
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☐
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☐
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	☐	☐	☐

- e) Result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments? ☐ ☐ ☐
- f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs? ☐ ☐ ☐
- g) Comply with federal, state, and local statutes and regulations related to solid waste? ☐ ☐ ☐

Discussion

- 19(a) The GPU EIR concluded this impact to be less than significant with mitigation. The proposed project is located within the service boundaries of the Vallecitos Water District, which will provide both water and sewer services. The project does not propose the use of on-site wastewater systems (OSWS), such as septic systems, and will instead connect to the existing public sewer infrastructure maintained by Vallecitos. According to the service availability confirmation from Vallecitos Water District, the District has adequate capacity to accommodate the wastewater demands of the proposed ten-lot residential subdivision. Therefore, the project would be consistent with the wastewater treatment requirements established by the RWQCB.

As previously discussed, the GPU EIR determined that impacts to wastewater treatment systems would be less than significant with mitigation. Because the proposed project will connect to an existing public sewer system with confirmed capacity, it would result in a less-than-sign

- 19(b) The GPU EIR concluded this impact to be less than significant with mitigation. The Project involves new water and wastewater pipeline extensions. However, these extensions would be on-site, and would not result in additional adverse physical effects beyond those already identified in other sections of this environmental analysis. Water and sewer service availability forms have been provided by Vallecitos Water District dated December 2022.

As previously discussed, the GPU EIR determined impacts on wastewater treatment requirements 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.

- 19(c) The GPU EIR concluded this impact to be less than significant with mitigation. As outlined in the project's SWQMP and in Section 10 – Hydrology and Water Quality, the project will implement on-site temporary and construction BMPs to minimize pollutants, including sediment from erosion or siltation, to the maximum extent practicable from entering stormwater runoff. These measures are designed to ensure project-related impacts to water quality are less than significant. The project includes an on-site biofiltration basin and other permanent structural BMPs, which are required to be maintained by the property owner in perpetuity as part of stormwater compliance obligations.

Proposed earthwork quantities for the project consist of approximately 96 cubic yards of cut and 16,019 cubic yards of fill, as detailed in the Preliminary Grading Plan. The site was previously developed with a single-family home, which has since been demolished, and

is now proposed for residential subdivision. The majority of grading will occur at the rear of the site in fill slope areas, and the project includes construction of retaining walls ranging from two to five feet in height to stabilize slopes and support future development.

The SWQMP by ABI Engineering includes a drainage analysis demonstrating that the project will not increase off-site drainage or flow volumes, and that the post-project drainage patterns will remain consistent with existing conditions. The stormwater design complies with County requirements for Low Impact Development (LID), source control, and pollutant control per the BMP Design Manual.

As previously discussed, the GPU EIR determined that impacts to stormwater drainage facilities could be mitigated to a less-than-significant level. Because the project includes appropriately designed and maintained on-site drainage infrastructure and BMPs, it would result in a less-than-significant impact and would be consistent with the analysis provided within the GPU EIR, as it would not increase the severity or scope of impacts previously identified.

- 19(d) The GPU EIR concluded this impact to be significant and unavoidable. A water service availability letter dated December 2020 has been provided by the Vallecitos Municipal Water District for operations of the project and show that there is adequate service for the Project. The Project does not include the use of groundwater.

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.

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

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

Conclusion

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

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

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

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

Discussion

Wildfire was analyzed 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.

- 20(a) The GPU EIR concluded this impact to be significant and unavoidable with respect to wildfire risk in the unincorporated areas of San Diego County. The project site is located within the LRA and falls under the jurisdiction of the San Marcos Fire Protection District. However, the project site is located outside the five-minute emergency response time required by the County of San Diego General Plan Safety Element for new residential development.

To address this, the applicant is required to obtain a signed Automatic Aid Agreement from the Escondido Fire Department, confirming that Escondido Fire will provide primary fire protection services to the project site. This measure ensures compliance with the five-minute travel time requirement and mitigates the extended response time from the nearest San Marcos Fire station. A copy of the signed agreement must be submitted to and

approved by the County Department of Planning & Development Services prior to Final Map approval.

Emergency access to the site will be provided by a new private cul-de-sac extending from Via Teramo, which connects to Montiel Road, a public street. The grading plan demonstrates that the internal access road is designed to meet fire code standards and will accommodate emergency vehicle access.

As previously discussed, wildfire risk was analyzed in the GPU EIR (Section 2.7, Hazards and Hazardous Materials) and was determined to be a significant and unavoidable impact at the countywide level. However, due to the project's location within a developed infill area, the absence of Very High Fire Hazard Severity Zone (VHFHSZ) designations, and the implementation of enhanced fire service coverage through the Automatic Aid Agreement, the proposed project would have a less-than-significant wildfire impact at the project level. Therefore, the project would be consistent with the analysis provided within the GPU EIR, as it would not increase the severity of wildfire-related impacts identified therein.

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

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

- 20(c) The GPU EIR concluded this impact to be significant and unavoidable. The Project would require the installation and maintenance of a new private cul-de-sac and driveways to provide access to the ten proposed residential lots that meet all fire district requirements. The Project also requires utility connections for water and sewer service from the Vallecitos Water District. In addition, the Project will include the installation of a fire hydrant to meet fire protection requirements and ensure adequate emergency response capability. These proposed improvements would not exacerbate fire risk. All infrastructure associated with the Project has been incorporated into this analysis. Therefore, no additional temporary or ongoing impacts to the environment related to associated infrastructure would occur that have not been analyzed in other sections of this environmental document.

As previously discussed, the GPU EIR determined impacts from wildfire to be significant and unavoidable. However, the Project would have a less-than-significant impact for the reasons detailed above. Therefore, the Project would be consistent with the analysis

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

- 20(d) The GPU EIR concluded this impact to be significant and unavoidable. As detailed in the project's Storm Water Quality Management Plan (SWQMP) prepared by ABI Engineering, the proposed project would not result in increased off-site drainage or flow of water, and post-development conditions would maintain drainage patterns consistent with existing conditions. Earthwork for the project will involve approximately 96 cubic yards of cut and 16,019 cubic yards of fill. The project site was previously developed with a single-family residence, which has been demolished, and is now proposed for subdivision into ten single-family residential lots.

Grading will primarily occur at the rear portion of the site and includes the construction of retaining walls ranging from two to five feet in height to support slope stability and lot layout. In addition, the project includes installation of a bioretention basin in the southwestern portion of the site, designed to treat runoff from impervious surfaces and reduce pollutants and hydromodification impacts. The project also proposes a fire hydrant to meet emergency response standards.

As noted in responses 10(i) and 10(j), the project is not located within a 100-year floodplain, floodway, or flood hazard area, and is not expected to be impacted by downstream flooding. Therefore, the project would not expose people or structures to significant risks from flooding, landslides, post-fire instability, or drainage changes.

As previously discussed, the GPU EIR determined impacts related to wildfire hazards to be significant and unavoidable at the countywide scale. The project complies with GPU EIR mitigation measure Haz-4.3, which requires adherence to applicable Building and Fire Codes, and incorporates Mitigation Measure Haz-4.2, requiring brush management as part of its standard project design features. Therefore, the project would result in a less-than-significant impact at the project level and would be consistent with the analysis provided within the GPU EIR, as it would not increase the severity of impacts previously identified.

Conclusion

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

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

5. No peculiar impacts to the Project or its site have been identified.
6. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
7. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
8. Feasible mitigation measures incorporated as standard design features associated with the project contained within the GPU EIR (Haz-4.2 and Haz-4.3) would be applied

to the Project. These measures, as detailed above, requires the Project applicant to implement brush management and comply with the building and fire codes.

Attachments:

Appendix A – References

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

Appendix A

The following project-specific technical studies, plans, agency forms, and regulatory documents were used to support the environmental analysis for the Montiel Road Subdivision.

Project-Specific Technical Studies

Air Quality and Greenhouse Gas Emissions

- Montiel Road Subdivision Detailed Report, Harris & Associates, May 28, 2026.
- Climate Action Plan Consistency Checklist, March 23, 2026

Cultural Resources

- A Negative Cultural Resources Survey Report for the 1434 Montiel Road Project, BFS&A Environmental Services, January 19, 2024.

Geology and Soils

- Preliminary Geotechnical Investigation Report for Proposed Residential Subdivision, 1434 Montiel Road, Escondido, California, ABI Engineering Consultants, October 25, 2022.
- Steep Slope Exhibit, ABI Engineering Consultants, June 3, 2023.

Hydrology and Water Quality

- Priority Development Project Stormwater Quality Management Plan, ABI Engineering Consultants, Inc., March 10, 2026.
- Hydrology and Hydraulics Study, ABI Engineering Consultants, Inc., March 10, 2026.

Noise

- Acoustical Analysis for Montiel Road TM, Eilar Associates, Inc., August 13, 2024.

Project Plans

- Tentative Map, Montiel Road Subdivision, PDS2022-TM-5648.
- Preliminary Grading Plan, ABI Engineering Consultants, Inc.
- Project Landscape Plan.

Project Facility Availability Forms—PDS-399

- Project Facility Availability Form—Escondido Fire Department, December 2024.
- Project Facility Availability Form—San Marcos Fire Department, March 2024.
- Project Facility Availability Form—Vallecitos Water District, Sewer Service, March 2024.
- Project Facility Availability Form—Vallecitos Water District, Water Service, December 2022.
- Project Facility Availability Form—Escondido Union School District, December 2022.
- Project Facility Availability Form—Escondido Union High School District, August 2025.

Plans, Regulations, and Other References

- California Public Resources Code, including Sections 21083.2 and 21083.3.
- California Environmental Quality Act Guidelines, including Sections 15064.5, 15183, and 15183.5 and Appendices F and G.
- County of San Diego General Plan.
- County of San Diego General Plan Update Final Program Environmental Impact Report, ER No. 02-ZA-001, SCH No. 2002111067, certified August 3, 2011.
- County of San Diego North County Metropolitan Subregional Plan.
- County of San Diego Zoning Ordinance.

- County of San Diego 2024 Climate Action Plan and CAP Consistency Review Checklist.
- County of San Diego Guidelines for Determining Significance applicable to the environmental issue areas evaluated in this checklist.
- County of San Diego Resource Protection Ordinance.
- County of San Diego Grading Ordinance.
- County of San Diego Watershed Protection Ordinance and BMP Design Manual.
- County of San Diego Light Pollution Code.
- County of San Diego Consolidated Fire Code.
- County of San Diego Water Efficient Landscape Ordinance.
- San Diego Air Pollution Control District, *2022 Regional Air Quality Strategy*.
- San Diego Air Pollution Control District Rules 20.1, 20.2, 20.3, 51, 55, and 67.0.1.
- California Air Resources Board, *California's 2017 Climate Change Scoping Plan*, December 14, 2017.
- California Air Resources Board, *2022 Scoping Plan for Achieving Carbon Neutrality*, December 2022.
- Office of Environmental Health Hazard Assessment, *Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments*, 2015.
- California Department of Transportation, California Scenic Highway Program.
- California Department of Conservation, Farmland Mapping and Monitoring Program and applicable geologic-hazard maps.
- Federal Emergency Management Agency, applicable Flood Insurance Rate Maps.
- California Building Code, California Energy Code, and California Green Building Standards Code.
- Applicable SANDAG regional growth forecasts, Regional Transportation Plan, and Sustainable Communities Strategy.

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

Appendix C

County of San Diego Guidelines For Determining Significance and Report Format and Content Requirements, Transportation and Traffic is available on the County of San Diego's website at:

https://www.sandiegocounty.gov/content/dam/sdc/dplu/docs/Traffic_Guidelines.pdf