VINCE NICOLETTI
DIRECTOR

PLANNING & DEVELOPMENT SERVICES
5510 OVERLAND AVENUE, SUITE 210, SAN DIEGO, CALIFORNIA 92123
(858) 505-6445 General • (858) 694-2705 Codes Compliance
(858) 565-5920 Building Services

TYLER FARMER
ASSISTANT DIRECTOR

April 16, 2026

Statement of Reasons for Exemption from Additional Environmental Review and 15183 Checklist

Pursuant to CEQA Guidelines §15183

Project Name:	Pasqual Heights Subdivision
Project Record Numbers:	PDS2024-TM-5657, PDS2024-DB-24-001
Environmental Log Number:	PDS2024-ER-24-08-006
APN(s):	234-160-25-00

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

County Staff Contact:
Aidan Pulley, Project Manager
Aidan.Pulley@sdcounty.ca.gov
(619) 972-8234

Project Location:
The Pasqual Heights Subdivision (project) is within the unincorporated North County Metro community planning area of San Diego County and is within the City of Escondido's sphere of influence. The approximately 10.39-acre project site is located at 830 Idaho Avenue. The project site is surrounded by single-family residential uses to the north, south, and west; a church to the southeast; and a garden center to the east.

Project Applicant Name and Address:
Kerry Garza, President
Touchstone Communities
9815 Mira Mesa Boulevard
San Diego, CA 92131

General Plan:

Community Plan:	North County Metro
Regional Categories:	Village
Land Use Designations:	Village Residential (VR-2)
Density:	Two Dwelling Units per Acre
Floor Area Ratio (FAR):	Not Applicable

Zoning:

Use Regulation:	A70 (Limited Agriculture)
Minimum Lot Size:	0.5 acres
Special Area Regulation:	Not Applicable

Description of Project

The project proposes the demolition of the existing single-family residence and construction of 42 single-family residential lots, an open space lot, and a dog park lot on the 10.39-acre site. The project would not require a zone change or general plan amendment. The land use designation Village Residential (VR-2) permits two dwelling units per acre, allowing a base density of 21 lots. The project proposes to increase this to 42 lots through application of the Density Bonus Law, as amended by Assembly Bill (AB) 1287, by reserving 29 percent (seven lots) of the base density units for very low- and moderate-income households. Specifically, 15 percent of the base density (four lots) would be reserved for very low-income households, and an additional 14 percent of the base density (three lots) would be reserved for moderate-income households. Project construction is anticipated to begin in August 2026 and last for approximately two years. Grading would include 74,791 cubic yards of cut and 74,893 cubic yards of fill, for a total soil import quantity of 102 cubic yards. Additionally, blasting or rock breaking with the use of a rock drill or hammer may be required during construction activities due to the presence of marginally rippable granite rock beneath the soil.

Access

Access to the project site would be via a new driveway, Private Road A, connected to Idaho Avenue, which is a County of San Diego (County) maintained mobility element road. Internal driveways would be constructed to allow for vehicular access throughout.

Sewer and Water

The project would construct a private sewer lift station and a biofiltration basin in the southeast portion of the project site, as well as a water-pressure-reducing station in the eastern portion of the project site. Water service would be provided by the City of Escondido and sewer service would be provided through an out-of-agency service agreement, including an Irrevocable Offer to Annex (IOA), processed through the County Local Agency Formation Commission (LAFCO) for annexation into the City of Escondido sanitation district.

Walls and Fencing

The project would construct block walls ranging from 5 feet to 8 feet along the southern and eastern borders of the project site. It would also install a 3-foot-6-inch-tall lodgepole fence along part of the southern boundary and privacy fences between each lot.

Off-Site Improvements

The project would construct a new public sidewalk along its frontage of Idaho Avenue, connecting to existing pedestrian improvements at the intersection of Idaho Avenue and San Pasqual Valley Road. Additionally, the project would install an accessible ramp at the subdivision entrance, providing safe crossing on Idaho Avenue at Private Road A and pedestrian connectivity to internal sidewalks.

Discretionary Approvals

The discretionary approvals required for the project include a Tentative Map and Density Bonus.

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 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 the 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 implementation, including information related to existing site conditions, analyses of the types and magnitude of project-level and cumulative environmental impacts, and feasible mitigation measures that could reduce or avoid environmental impacts.

Summary of Findings

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

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

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

1. **The project is consistent with the development density established by existing zoning, community plan, or general plan policies for which an EIR was certified.**
   The project includes the construction of 42 single-family residential lots. The project site is zoned A70 (Limited Agriculture) and subject to the General Plan Designation Village Residential (VR-2). The Village Residential (VR-2) land use designation allows for two dwelling units per acre. The project would utilize the Density Bonus Law, as updated by AB 1287, to increase the density to 42 lots by reserving 29 percent (seven lots) of the base density units for very low- and moderate-income households, as follows: 15 percent of the base density (four lots) reserved for very low-income households plus an additional 14 percent of the base density (three lots) reserved for moderate-income households. Therefore, the project would be consistent with the density established by the existing land use designation.

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 project site 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 Exemption Checklist below, all project impacts were adequately analyzed by the GPU EIR. The project could result in potentially significant impacts to Biological Resources, Cultural Resources, Hydrology and Water Quality, Noise, and Transportation. However, applicable mitigation measures specified within the GPU EIR have been made conditions of approval for the 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 land use designation Village Residential (VR-2) permits two dwelling units per acre, allowing a base density of 21 lots. The project proposes to increase this to 42 lots through application of the Density Bonus Law, as amended by AB 1287, by reserving 29 percent (seven lots) of the base density units for very low- and moderate-income households. Specifically, 15 percent of the base density (four lots) would be reserved for very low-income households, and an additional 14 percent of the base density (three lots) would be reserved for moderate-income households. Use of the Density Bonus Law renders the project consistent with the density and land use characteristics evaluated in the GPU EIR and represents an incremental component of the growth anticipated at General Plan buildout. As further explained in the 15183 Exemption Checklist below, the GPU EIR adequately analyzed the project's potential impacts, and no new potentially significant off-site or cumulative impacts have been identified.

4. **There is no substantial new information which results in more severe impacts than anticipated by the GPU EIR.**
   As explained in the 15183 Exemption Checklist below, the project as analyzed does not result in new information which would result in a determination of a more severe impact than what had been anticipated by the GPU EIR.

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

Signature	Date
Aidan Pulley	Land Use/Environmental Planner
Printed Name	Title

CEQA Guidelines §15183 Exemption Checklist

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

- Items checked “Significant Project Impact” indicates that the project could result in a significant effect which either requires mitigation to be reduced to a less than significant level or which has a significant, unmitigated impact.

- Items checked “Impact not identified by GPU EIR” indicates the project would result in a project-specific significant impact (peculiar off-site or cumulative that was not identified in the GPU EIR.

- Items checked “Substantial New Information” indicates that there is new information which leads to a determination that a project impact is more severe than what had been anticipated by the GPU EIR.

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

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

1. Aesthetics

Would the project:

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
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; therefore, 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 on a scenic vista requires analyzing the changes to the vista as a whole, and also to individual visual resources.

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

The project site is approximately 2.8 miles north of Escondido Oaks, which is identified by the North County Metropolitan Subregional Plan as an RCA. However, the project site is not visible from this RCA due to the surrounding topography and intervening structures.

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

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. 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.

Per the Caltrans State Scenic Highway System Map (Caltrans 2025), there are no officially designated or eligible state scenic highways near the project site. As described in Section 5(a) below, there are no historic buildings located on the project site. In addition, the project does not contain rock outcroppings. Although the project site contains trees, the nearest officially designated state scenic highway is a segment of State Route 52, approximately 17.8 miles south of the project site. The nearest eligible state scenic highways are Interstate 5, approximately 13.7 miles west of the project site; State Route 76, approximately 13.2 miles northwest of the project site; and a segment of Interstate 15, approximately 16 miles northwest of the project site. Views of the project site are not readily afforded from State Route 52, Interstate 5, State Route 76, or Interstate 15 due to distance, topographic conditions, and intervening vegetation and structures. Therefore, the project would not substantially damage scenic resources within a state scenic highway, and impacts would be less than significant.

As previously discussed, the GPU EIR determined impacts on scenic resources to be less than significant with mitigation. As the 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.

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 according to the viewer's exposure, sensitivity, and expectations.

The project site is surrounded by single-family residential uses to the north, south, and west; a church to the southeast; and a garden center to the east. The project would not detract from, or contrast with the existing visual character and/or quality of the surrounding areas. The proposed single-family residential use would be compatible with uses in the immediate area. By constructing a development similar to the existing visual environment, the project would not result in any change to visual character. Project impacts would be less than significant.

As previously discussed, the GPU EIR determined impacts on visual character or quality to be significant and unavoidable. The project would have a less than significant impact for the reasons detailed above. 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.

1(d) The GPU EIR concluded impacts from new sources of substantial light or glare, which would adversely affect day or nighttime views in the area, to be significant and unavoidable. The County Light Pollution Code divides the County into two lighting zones based on proximity to astronomical observatories. Zone A encompasses areas within a 15-mile radius of the Palomar and Mount Laguna Observatories, where stricter outdoor lighting standards apply to protect dark-sky conditions. Zone B includes all remaining areas of the County outside those radii and is subject to less restrictive lighting requirements. The project site is not located within Zone A of the County Light Pollution Code (within 15 miles of the Mount Laguna Observatory or the Palomar Observatory) and is therefore within Zone B. Projects located in Zone B must comply with the County's Light Pollution Code (§§51.201 through 51.209 of the County Code of Regulatory Ordinances), which establishes lighting performance standards. The project would conform all relevant requirements including the requirements for lamp source and shielding applicable to Zone B (§51.204) to prevent spillover onto adjacent properties and minimize impacts to dark skies. Compliance with the County Light Pollution Code would be required prior to the issuance of a building permit. The County Light Pollution Code was developed by the County in cooperation with lighting engineers, astronomers, and other experts to effectively address and minimize the impact of new sources of light pollution on nighttime views. Thus, the project would not create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area. Project impacts would be less than significant.

As previously discussed, the GPU EIR determined impacts from light or glare to be significant and unavoidable. The project would have a less than significant impact for the reasons detailed above. 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.

Conclusion

With regard 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.

2. Agriculture/Forestry Resources

Would the project:

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
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. The project site is zoned A70 (Limited Agriculture) and subject to the General Plan Designation Village Residential (VR-2). The California Department of Conservation (DOC) California Important Farmland Finder classifies the project site as Urban and Built-Up Land (California DOC 2025a). Furthermore, a review of Google Earth historic aerials shows that the site conditions have remained substantially the same as the current condition with no evidence of agricultural activity on-site. Therefore, the project site is not classified as an important agricultural resource and there are no agricultural resources on the project site that would be impacted.

As previously discussed, the GPU EIR determined impacts from the direct and indirect conversion of agricultural resources to be significant and unavoidable. The project would have a less than significant impact for the reasons detailed above. 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.

2(b) The GPU EIR concluded this impact to be less than significant with mitigation. The project site is designated as Village Residential (VR-2) in the County's General Plan and zoned A70 (Limited Agriculture). The land use designation Village Residential (VR-2) permits two

dwelling units per acre, allowing a base density of 21 lots, and the A70 (Limited Agriculture) zone allows for family residential.

Although the project site is zoned A70 (Limited Agriculture), the site does not meet the definition of "agricultural resource" as defined in the County Guidelines for Determining Significance: Agricultural Resources. Specifically, an agricultural resource is defined to include "any land with an active agricultural operation, or any site with a history of agricultural production based on aerial photography or other data sources identifying agricultural land uses" (County of San Diego 2015). As stated under 2(a) above, the project site does not meet this definition because it does not support active agricultural operations. Furthermore, according to the California DOC, California Williamson Act Enrollment Finder (California DOC 2025b), the project site is not subject to a Williamson Act contract. Therefore, the project would not conflict with existing zoning for agricultural use or a Williamson Act contract. No impact would occur.

As previously discussed, the GPU EIR determined impacts from land use conflicts to be less than significant with mitigation. As the project would have a less than significant impact for the reasons detailed above, the project would be consistent with the analysis provided in the GPU EIR because it would not increase impacts identified in 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 in Section 2(a), the project site would not be considered an agricultural resource. Therefore, the project would not result in any conversion of 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. The project would have less than significant impacts on agricultural

resources. 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.

Conclusion

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

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

3. Air Quality

Would the project:

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

Discussion

The following responses are based on the Air Quality Analysis prepared by RECON Environmental, Inc. (RECON 2025a).

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 (NO_X), 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-2) in the County's General Plan and zoned A70 (Limited Agriculture). The project would not require a zone change or a General Plan Amendment; rather, the project would utilize the Density Bonus Law, as updated by AB 1287, to increase the density to 42 lots. Although the project would utilize the density bonus, it would not result in growth that is not accounted for in the RAQS. 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. Therefore, the project would be consistent with the growth projections accounted for in the RAQS. Further, as calculated in the Air Quality Analysis (RECON 2025a) and shown in Tables 1 and 2 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 this impact to be significant and unavoidable. The County is currently in non-attainment for ozone under the NAAQS. The County is also presently in non-attainment for ozone, PM_{10} and $PM_{2.5}$ under the CAAQS. Ozone 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 particulate matter less than 10 microns in diameter (PM_{10}) and particulate matter less than 2.5 microns in diameter ($PM_{2.5}$) in both urban and rural areas include the following: motor vehicles, wood burning stoves and fireplaces, dust from construction, landfills, agriculture, wildfires, brush and 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 Screening Level Thresholds (SLTs) presented in Tables 1 and 2. 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 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 1
Summary of Maximum Construction Emissions
(pounds per day)

Phase	Pollutant					
	ROG	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Demolition	2	21	20	<1	1	1
Site Preparation	3	29	30	<1	9	5
Grading Total	3	31	39	<1	12	5
CalEEMod Calculations	*3*	*29*	*32*	*<1*	*5*	*3*
Blasting Activities	*0*	*2*	*7*	*<1*	*7*	*2*
Building Construction	1	10	14	<1	1	<1
Paving	1	7	10	<1	<1	<1
Architectural Coatings	20	1	1	<1	<1	<1
Maximum Daily Emissions	**20**	**31**	**39**	**<1**	**12**	**5**
County Screening Level Thresholds	*75*	*250*	*550*	*250*	*100*	*55*

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
SOURCE: RECON 2025a

Table 2
Summary of Project Operational Emissions
(pounds per day)

Source	Pollutant					
	ROG	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Mobile	1	1	9	<1	2	1
Area	65	1	72	<1	10	10
Energy*	<1	<1	<1	<1	<1	<1
Emergency Generator Testing	1	2	2	<1	<1	<1
Total**	**67**	**4**	**84**	**<1**	**12**	**10**
County Screening Level Thresholds	*75*	*250*	*550*	*250*	*100*	*55*

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
SOURCE: RECON 2025a
*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.

Emissions would result from construction and operation of the project. Construction impacts are short term and result from fugitive dust, equipment exhaust, and indirect effects associated with construction workers and deliveries. Operational emissions would result from mobile, area (fireplaces, consumer products, architectural coatings, and landscaping activities), energy (natural gas combustion), and stationary (emergency generator testing) sources. Construction and operation air emissions were calculated as a part of the Air Quality Analysis (RECON 2025a) using the California Emissions Estimator Model (CalEEMod) 2022.1 (California Air Pollution Control Officers Association 2022). Calculations details and methodology can be found in the Air Quality Analysis (RECON 2025a).

Construction

Construction calculations include emissions associated with potential blasting that may be required. Table 1 shows the total projected construction maximum daily emission levels for each criteria pollutant.

Construction activities would be subject to several control measures per the requirements of the County, SDAPCD rules, and CARB Airborne Toxic Control Measures. The following required control measures have been incorporated into the calculations of construction emissions:

- Per the County's *Standard Mitigation and Project Design Consideration Grading, Clearing and Watercourses Ordinance* §87.428, "All clearing and grading shall be carried out with dust control measures adequate to prevent creation of a nuisance to persons or public or private property. Clearing, grading or improvement plans shall require that measures such as the following be undertaken to achieve this result: watering, application of surfactants, shrouding, control of vehicle speeds, paving of access areas, or other operational or technological measures to reduce dispersion of dust."
- Per SDAPCD Rule 67.0.1, the applicant shall use regulated coatings for all architectural coating activities.
- Per CARB's Airborne Toxic Control Measure 13 (California Code of Regulations Chapter 10 §2485), the applicant shall not allow idling time to exceed 5 minutes unless more time is required per engine manufacturers' specifications or for safety reasons.

As shown in Table 1, maximum construction emissions would be less than the County's SLTs for all criteria pollutants. Furthermore, project construction would be temporary and would last for approximately two years. Therefore, the project would not violate any air quality standard or contribute substantially to an existing or projected air quality violation.

Operation

Daily operational emissions are summarized in Table 2. As shown in Table 2, the project's daily operational emissions would not exceed the SLTs for any pollutant. Therefore, the project would not violate any air quality standard or contribute substantially to an existing or projected air quality violation.

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

3(c) The GPU EIR concluded this impact to be significant and unavoidable. The County is presently in non-attainment for the NAAQS and CAAQS for ozone. The County is also presently in non-attainment for PM_{10} and $PM_{2.5}$ under the CAAQS.

Cumulative impacts could occur if the most intensive phases of construction for the proposed project occur simultaneously with other intensive phases of proposed projects within 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}. As discussed in the Air Quality Assessment (RECON 2025a), the project's maximum daily emissions of PM_{10} was estimated to be 12 pounds per day, which would be well below the County's SLT of 100 pounds per day for PM_{10} during construction activities (see Table 1). 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 would not generate construction or operational emissions in quantities that would result in an exceedance of the NAAQS or CAAQS for ozone, PM_{10}, or $PM_{2.5}$, and direct impacts would be less than significant. The County's SLT aligns with attainment of the NAAQS, which were developed to protect the public health, specifically the health of sensitive populations, including people with asthma, children, and the elderly. Consequently, project construction and operation would have a less than significant impact on public health.

Air quality impacts are basin-wide, and air quality is affected by all pollutant sources in the basin. As the individual project thresholds are designed to help achieve attainment with cumulative basin-wide standards, they are also appropriate for assessing the project's contribution to cumulative impacts. As emissions would be less than the SLTs, project construction and operation would not 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, and impacts would be cumulatively less than significant.

As previously discussed, the GPU EIR determined impacts to non-attainment criteria air pollutants to be significant and unavoidable. However, the project would have a less than significant impact on non-attainment criteria air pollutants for the reasons stated above. Therefore, the project would be consistent with the analysis provided in the GPU EIR because it would not increase impacts or result in new impacts not identified in 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 through 12th grade), hospitals, resident care facilities, daycare centers, residences, or other facilities that may house individuals with health conditions that would be adversely impacted by changes in air quality. Single-family residential uses are located in the vicinity of the project site as close as 30 feet from the project boundary.

The two primary emissions of concern regarding health effects for land development projects are diesel particulate matter (DPM) and carbon monoxide (CO). Projects that would site sensitive receptors near potential CO hotspots or would contribute vehicle traffic to local intersections where a CO hotspot could occur would be considered to have a potentially significant impact. The project would not introduce any new sources of toxic air contaminants; therefore, project operation would not produce a cancer risk.

Construction-Related Diesel Particulate Matter

Construction of the project and associated infrastructure would result in short-term diesel exhaust emissions from on-site heavy-duty equipment. Construction of the project would result in the generation of diesel-exhaust DPM emissions from the use of off-road diesel equipment required for site preparation and excavation, paving, and other construction activities and on-road diesel equipment used to bring materials to and from the project site. Generation of DPM from construction projects typically occurs in a single area for a short period. Construction is anticipated to last for approximately two years. 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 to the substance. Dose is positively correlated with time, meaning that a longer exposure period would result in a higher exposure level. The risks are higher if a fixed exposure occurs over a longer period of time. According to the Office of Environmental Health Hazard Assessment, health risk assessments, which determine the exposure of sensitive receptors to toxic emissions, should be based on 9-, 30-, and 70-year exposure periods; however, such assessments should be limited to the period/duration of activities associated with the project (Office of Environmental Health Hazard Assessment 2015). Thus, if the duration of proposed construction activities near any specific sensitive receptor were two years, the exposure would be seven percent of the total 30-year exposure period used for health risk calculation. Further, construction activities would be subject to several control measures per the requirements of the County, SDAPCD rules, and CARB Airborne Toxic Control Measures. Specifically, per CARB's Airborne Toxic Control Measures 13 (California Code of Regulations Chapter 10 §2485), the applicant shall not allow idling time to exceed 5 minutes unless more time is required per engine manufacturers' specifications or for safety reasons. Due to the short-term construction duration and the limited construction emissions, there is very low potential for fugitive dust or DPM to impact sensitive receptors during construction. The total project

construction DPM emissions are not of a magnitude and duration that could create significant air toxic risks (maximum incremental cancer risk greater than one in one million without the application of best available control technology for toxics or a health hazard index greater than one) to the nearest receptors during construction. Compliance with the SDAPCD rules and regulations would reduce the fugitive dust emissions during project construction and associated impacts to sensitive receptors. Thus, the project's construction emissions would not have the potential to significantly impact the nearby residents. Therefore, the project would not expose sensitive receptors to substantial levels of TACs during construction, and impacts would be less than significant.

CO Hotspots

Localized CO concentration is a direct function of motor vehicle activity at signalized intersections (e.g., idling time and traffic flow conditions), particularly during peak commute hours and meteorological conditions. The SDAB is a CO maintenance area under the federal Clean Air Act. This means that the SDAB was previously a non-attainment area and is currently implementing a 10-year plan for continuing to meet and maintain air quality standards. Due to increased requirements for cleaner vehicles, equipment, and fuels, CO levels in the state have dropped substantially. All air basins in California are attainment or maintenance areas for CO. Therefore, more recent screening procedures based on more current methodologies have been developed. The Bay Area Air Quality Management District developed a screening threshold in their 2022 CEQA Guidelines (Bay Area Air Quality Management District 2022). These screening criteria are considered applicable in the SDAB because the San Francisco Bay Air Basin and the SDAB have the same CO maintenance designations, and the vehicle classifications in the regions are similar. According to the Bay Area Air Quality Management District's 2022 CEQA Guidelines, if the following screening criteria are met, operation of a project would result in less than significant impacts related to CO:

- The project is consistent with an applicable congestion management program established by the County congestion management agency for designated roads or highways, the regional transportation plan, and local congestion management agency plans.

- Project-generated traffic would not increase traffic volumes at affected intersections to more than 44,000 vehicles per hour.

- Project-generated traffic would not increase traffic volumes at affected intersections to more than 24,000 vehicles per hour where vertical and/or horizontal mixing is substantially limited (e.g., tunnel, parking garage, bridge underpass, natural or urban street canyon, below-grade roadway).

Based on the Transportation Impact Study (TIS) prepared for the project (C2 Consulting Collective 2025), peak hour volumes at the study area intersections would be significantly less than 44,000 vehicles per hour. The project-related peak hour trips added to affected intersections would range from zero to 15 vehicles per hour and would not be substantial. Additionally, as discussed in detail in Section 17(b), the project would not conflict with an applicable congestion management program. Therefore, the project would not result in a CO hot spot, and impacts would be less than significant.

As previously discussed, the GPU EIR determined impacts to sensitive receptors to be significant and unavoidable. The project would have a less than significant impact on

sensitive receptors. 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.

3(e) The GPU EIR concluded this impact to be less than significant. SDAPCD Rule 51 (Public Nuisance) and California Health and Safety Code, Division 26, Part 4, Chapter 3, §41700 prohibit the emission of any material which causes nuisance to a considerable number of persons or endangers the comfort, health, or safety of the public. Projects required to obtain permits from SDAPCD, typically industrial and some commercial projects, are evaluated by SDAPCD staff for potential odor nuisance, and conditions may be applied (or control equipment required) where necessary to prevent occurrence of public nuisance.

The potential for an odor impact is dependent on a number of variables, including the nature of the odor source, distance between the receptor and odor source, and local meteorological conditions. During construction, construction equipment may generate some nuisance odors. Sensitive receptors near the project site include residential uses; however, exposure to odors associated with project construction would be short term and temporary in nature. Further, per CARB's Airborne Toxic Control Measures 13 (California Code of Regulations Chapter 10 §2485), the applicant shall not allow idling time to exceed 5 minutes unless more time is required per engine manufacturers' specifications or for safety reasons. Therefore, project construction would not generate odors adversely affecting a substantial number of people, and impacts would be less than significant.

Once operational, the residential portion of the project would not be a source of odors. As discussed, the project would include a sewer lift station. The sewer lift station would be equipped with an odor control system consisting of activated carbon. Specifications for this odor control system are provided in Attachment 2 of the Air Quality Analysis (RECON 2025a). With proper installation and maintenance of this system, which would be performed by the homeowners association, impacts associated with the sewer lift station would 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 regard to the issue area of Air Quality, the following findings can be made:

1. No peculiar impacts to the project or its site have been identified.

2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.

3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.

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

4. Biological Resources

Would the project:

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
a) Have a substantial adverse effect, either directly or through habitat modifications, on any candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☐
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. 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

The following responses are based on the Biological Resources Letter Report prepared by Merkel & Associates, Inc. (2025).

4(a) The GPU EIR concluded this impact to be significant and unavoidable.

Vegetation Communities

The biological study area (BSA) includes the project site and 100 feet beyond the parcel boundary. Four vegetation communities were identified within the BSA: non-native grassland, non-native woodland, disturbed habitat, and urban/developed lands. As shown in Table 3, the project would result in direct, permanent impacts to all on-site communities, consisting of non-native grassland, non-native woodland, disturbed habitat, and urban/developed lands. Implementation of the project would also result in direct, permanent impacts to off-site communities, consisting of disturbed habitat and urban/developed as a

result of necessary utility and roadway improvements. Consistent with mitigation measure Bio-1.5 in the GPU EIR, the project utilizes the County's Guidelines for Determining Significance for Biological Resources (County of San Diego 2010) to identify adverse impacts to biological resources. In addition, consistent with mitigation measure Bio-1.6 in the GPU EIR, the project implements the County's Resource Protection Ordinance, Biological Mitigation Ordinance, and Habitat Loss Permit Ordinance. Specifically, in accordance with Table 5 of the County's Guidelines for Determining Significance for Biological Resources, impacts to non-native grassland would be significant. Mitigation measure Bio-1, which is consistent with mitigation measures Bio-1.5 and Bio-1.6 in the GPU EIR, would require mitigation at the ratio of 0.5:1. Therefore, implementation of mitigation measure Bio-1 would reduce impacts to non-native grassland to a less than significant level.

Table 3
Impacts to Vegetation Communities

Vegetation Community	Impact Acreage			Potential Mitigation Ratio	Potential Mitigation Required
	On-site	Off-site	Total		
Non-Native Grassland: Broadleaf Dominated	2.4	0.0	2.4	0.5:1	1.2
Non-Native Woodland	0.9	0.0	0.9	None	0.0
Disturbed Habitat	6.4	0.2	6.6	None	0.0
Urban/Developed	1.0	0.2	1.2	None	0.0
Total	**10.7**	**0.4**	**11.1**	**--**	**1.2**

Special Status Species

Implementation of the project is not expected to impact any special status flora since none were detected within the BSA and none are expected to have a moderate or high potential to occur on-site.

Implementation of the project would result in direct, permanent impacts to non-native grassland considered raptor (e.g., Cooper's hawk, barn owl, etc.) foraging habitat. Impacts to raptor foraging habitat would be significant per the County's Guidelines and would require implementation of mitigation measures Bio-1.5 and Bio-1.6 in the GPU EIR. Implementation of mitigation measure Bio-1.5 and Bio-1.6 in the GPU EIR would require mitigation in accordance with Table 5 of the County's Guidelines for Determining Significance for Biological Resources as outlined above. As shown in Table 3, the project would be required to mitigate the loss of 2.4 acres of non-native grassland at the ratio of 0.5:1. Therefore, implementation of mitigation measure Bio-1, which is consistent with mitigation measures Bio-1.5 and Bio-1.6 in the GPU EIR, would reduce impacts to non-native grassland considered raptor foraging habitat to a less than significant level.

Implementation of the project could result in direct, permanent impacts to nesting raptors such as Cooper's hawk, barn owl or other avian species protected by the federal Migratory Bird Treaty Act (MBTA) and §3503, §3503.5, and §3513 of the California Fish and Game Code (FGC). Impacts to active migratory bird nests, if present at the time of construction, are prohibited under the federal MBTA and FGC §3503 and §3513.

Mitigation measure Bio-2, which is consistent with mitigation measure Bio-1.6 in the GPU EIR, would require the project to avoid any direct impacts to raptors and other nesting birds present on-site that are protected by the MBTA and California FGC §3503, §3503.5, and §3513 (Nesting Birds). Removal of habitat would be required to occur outside of the

breeding season for these species (January 15 to July 15 for raptors, February 15 to August 31 for all other birds). If removal of habitat must occur during the breeding season, a Qualified Biologist shall conduct a pre-construction survey(s) to determine the presence or absence of nesting birds on or immediately adjacent to the project site at least three calendar days prior to the start of project activities. Therefore, implementation of mitigation measure Bio-2, which is consistent with mitigation measure Bio-1.6 in the GPU EIR, would reduce impacts to nesting birds to a less than significant level.

The Biological Resources Report (Merkel & Associates, Inc. 2025) determined that there is potential for Crotch's bumble bee to occur on-site. As a result, Merkel & Associates, Inc. conducted an updated habitat assessment and three focused surveys for Crotch's bumble between June and July 2025, for the purpose of determining the presence or absence of this species in the BSA. Crotch's bumble bee or Crotch's bumble bee nests were not detected during the survey effort and are presumed to be absent from the project site; this is the same conclusion for American bumble bee. Overall, the cover of flowering plant species and preferred nectar sources was low within the BSA. Suitable nesting substrate for Crotch's bumble bee was observed within the project site, including leaf litter beneath some of the non-native trees and bare ground in areas that have been maintained. An active California ground squirrel population was also present, and their burrows could provide suitable nesting opportunities. However, because most of the burrows are actively used by squirrels, it is unlikely that bumble bees would occupy them. Additionally, routine vegetation maintenance across the site, which complies with the direction provided by the local fire authority, is expected to further reduce nesting potential.

Although the project is not expected to result in direct, permanent impacts to foraging habitat utilized by the Crotch's bumble bee or Crotch's bumble bee nests, if present at the time of construction, "take" of the Crotch's bumble bee, a California Endangered Species Act (CESA) candidate for state listing, would be prohibited under CESA. Implementation of mitigation measure Bio-3, which is consistent with mitigation measure Bio-1.6 in the GPU EIR, would reduce potential impacts Crotch's bumble bee to a less than significant level.

An individual bat was observed foraging over the western portion of the BSA. Although the possibility of special status bat species to utilize the project site for nesting or roosting is expected to be low, there is a potential for common bat species such as the Mexican free-tailed bat to roost within the on-site palm trees with dead frond skirts; albeit due to the surrounding urban setting, it is expected that there is higher quality roosting habitat off-site. While there are only approximately two palm trees on-site, the project would incorporate the Site Design Measure 1, as outlined below, as a condition of project approval to reduce potential impacts to roosting bats to the greatest extent feasible.

> **Site Design Measure 1:** The removal of mature trees and snags shall be minimized to the greatest extent practicable. Mature trees and snags to be removed as part of the project shall be more closely evaluated by the Qualified Biologist for their potential to support maternity colonies of bats. Trees that are identified as suitable bat roost sites shall be removed using a two-step process that occurs over a 2-day period. On Day 1, branches and limbs that do not contain crevices or cavities shall be removed using hand tools or chainsaws. The goal is to create a disturbance sufficient to cause any bats roosting in the tree to leave that night and not return, but not at a level of intensity that will cause bats to fly out of the tree during the disturbance itself (i.e., during the daytime, when leaving the roost will likely result in predation). On Day 2, the remainder of the tree may be removed.

Tree trimming/removal activities shall be performed outside of the bat maternity season (typically April 1 through August 31), to avoid direct impacts to nonvolant (flightless) young that may roost in trees within the study area.

If trimming or removal of trees during the bat maternity season (April 1 through August 31) cannot be avoided, all mature trees to be removed that have also been identified as containing suitable bat-roosting habitat will be surveyed at night within one week prior to removal. Any trees confirmed during those surveys as housing bat maternity colonies and/or special-status bat species will be avoided until the end of the maternity season.

Indirect Impacts

Implementation of the project could result in indirect impacts to resources adjacent to the project site, most notably from the effects of disturbance and clearing of vegetation within the project footprint. In addition, exposed soils from clearing and grubbing may result in erosion and subsequent off-site sedimentation within off-site areas. Implementation of mitigation measure Bio-4, which is consistent with mitigation measures Bio-1.6 and Bio-1.7 in the GPU EIR, would require a Qualified Biologist to inspect and oversee installation of temporary perimeter fencing, to be on-site during the initial clearing and grubbing of habitat, and to conduct regular inspections thereafter during grading operations to ensure compliance with the project biological requirements. Therefore, implementation of mitigation measure Bio-4, which is consistent with mitigation measures Bio-1.6 and Bio-1.8 in the GPU EIR, would reduce potential indirect impacts to a less than significant level.

As previously discussed, the GPU EIR determined impacts to special status species to be significant and unavoidable. Due to the removal of on-site habitat, the project would be required to mitigate the loss of 2.4 acres of non-native grassland at the ratio of 0.5:1 and to avoid any direct impacts to raptors and other nesting birds as discussed above. The project would implement mitigation measures Bio-1 and Bio-2, consistent with the GPU EIR mitigation measures Bio 1.5 and Bio 1.6, which would reduce impacts to a less than significant level. In addition, implementation of mitigation measure Bio-4, which is consistent with mitigation measures Bio-1.6 and Bio-1.7 in the GPU EIR, would reduce potential indirect impacts to a less than significant level. Therefore, the project would be consistent with the analysis within the GPU EIR because it would not create new impacts, increase impacts, and there is no new information of substantial importance than identified within the GPU EIR.

Bio-1 (Consistent with Mitigation Measures Bio-1.5 and Bio-1.6 in the GPU EIR): Prior to issuance of a grading permit, the County shall document that required project habitat mitigation for non-native grassland has been secured based on the mitigation ratios derived from and generally consistent with the mitigation ratios listed within the County Guidelines for Determining Significance for Biological Resources. The project applicant shall mitigate for project impacts to approximately 1.2 acres of non-native grassland at a 0.5:1 ratio. Mitigation can be achieved through a combination of 1.2 acres of habitat restoration, establishment, enhancement, preservation, and/or purchase of suitable credits from an approved mitigation bank, subject to approval by the County. The Applicant is proposing to mitigate impacts to non-native native grassland through purchase of 1.2 acres of non-native grassland credits from Cleveland Corridor Conservation Bank or another bank deemed acceptable to the County.

Bio-2 (Consistent with Mitigation Measure Bio-1.6 in the GPU EIR):
To avoid any direct impacts to raptors and other nesting birds protected by the MBTA and California FGC §3503, §3503.5, and §3513 (Nesting Birds) present on-site, removal of habitat shall occur outside of the breeding season for these species (generally January 15 to July 15 for raptors, February 15 to August 31 for all other birds). If removal of habitat must occur during the breeding season, a Qualified Biologist shall conduct a pre-construction survey(s) to determine the presence or absence of Nesting Birds on or immediately adjacent to the project site no more than three calendar days prior to the start of project activities. If construction is inactive for more than three days, an additional survey shall be conducted. The results of the pre-construction survey shall be documented by the Qualified Biologist and shall be provided to the County.

If the Qualified Biologist determines that no active migratory bird or raptor nests occur, the activities shall be allowed to proceed without any further requirements. If Nesting Birds are detected, then all construction activities undertaken for the project shall comply with regulatory requirements of the federal MBTA and FGC §3503 and §3513 (and reported to the County, if determined necessary). This may include that the Biologist implement appropriate mitigation measures including, but not limited to, establishing a buffer around the active nest. The specific buffer width shall be determined by the Biologist at the time of discovery and may vary according to the avian species, site conditions, and type of necessary work. The Designated Biologist shall monitor the nest at the onset of project activities, and at the onset of any changes in such project activities (e.g., increase in number or type of equipment, change in equipment usage, etc.) to determine the efficacy of the buffer. No construction activities shall occur within the buffer until the young have fledged or the nest is no longer active. The Qualified Biologist shall halt all construction activities within proximity to an active nest if it is determined that the activities are harassing the nest and may result in nest abandonment or take. Work can resume within these avoidance areas when no other active nests are found.

Bio-3 (Consistent with Mitigation Measure Bio-1.6 in the GPU EIR):
To avoid impacts to Crotch's bumble bee, removal of habitat in the proposed area of disturbance should occur outside of the Colony Active Period between April 1 through August 31. If removal of habitat in the proposed area of disturbance must occur during the Colony Active Period, a Qualified Biologist shall conduct a pre-construction survey to determine the presence or absence of Crotch's bumble bee within the proposed area of disturbance.

The pre-construction survey shall be conducted during the Colony Active Period between April 1 through August 31 by the Qualified Biologist within one year prior to the initiation of project activities (including removal of vegetation). The pre-construction survey shall consist of photographic surveys and follow the methodology developed consistent with the CDFW Survey Considerations for CESA Candidate Bumble Bee Species (CDFW 2023). The surveys shall consist of passive methods unless a Memorandum of Understanding is obtained. The surveys shall consist of three separate visits spaced a minimum of one week apart. Survey results are typically considered valid until the start of the next colony active period.

If additional activities (e.g., capture or handling) are deemed necessary to identify bumble bees of an unknown species that may be Crotch's bumble bee, then the Qualified Biologist shall obtain the required authorization via a Memorandum of

Understanding or Scientific Collecting Permit pursuant to CDFW Survey Considerations for CESA Candidate Bumble Bee Species (CDFW 2023). Survey methods that involve lethal take of species are not acceptable.

The Qualified Biologist/owner permittee shall submit the results of the pre-construction survey to the County and CDFW for review and approval prior to initiating construction activities.

If pre-construction surveys identify Crotch's bumble bee individuals on-site, the Qualified Biologist shall notify and consult with CDFW to determine whether project activities would result in impacts to Crotch's bumble bee, in which case an Incidental Take Permit (ITP) may be required prior to initiating construction activities. Take of any endangered, threatened, candidate species that results from the project is prohibited, except as authorized by State law (California Fish and Game Code §§ 86, 2062, 2067, 2068, 2080, 2085; California Code of Regulations, Title 14, § 786.9) under CESA.

Survey data shall be submitted by the Qualified Biologist to the CNDDB in accordance with the Memorandum of Understanding with CDFW, or Scientific Collecting Permit requirements, as applicable.

Bio-4 (Consistent with Mitigation Measures Bio-1.6 and Bio-1.7 in the GPU EIR): To avoid impacts to resources adjacent to the project site, and to ensure compliance with all biological conditions imposed on the project, the following measures shall be required:

- Construction period and permanent best management practices (BMPs) and water quality requirements shall be designed and implemented in accordance with applicable state and local rules and regulations. This includes temporary placement of silt fence or similar perimeter control at the property boundary to prevent any loss of sand, silt, or material from the site during construction activities.

- All construction activities shall occur during normal daylight hours in accordance with the County and if applicable, City of Escondido local rules and regulations.

- A Qualified Biologist shall be retained to inspect and oversee installation of temporary perimeter fencing, be on-site during the initial clearing and grubbing of habitat and conduct regular inspections thereafter during grading operations to ensure compliance with the project biological requirements. The Biologist shall be knowledgeable of upland biology and ecology, possess a bachelor's degree in a biological related field, and have at least two years of experience in field biology or current certification of a nationally recognized biological society. In lieu of the above qualifications, a resume shall demonstrate to the satisfaction of the County that the proposed Biologist has the appropriate training and background to effectively implement the biological-related site design measures. The Biologist shall have the authority to halt construction activities, if needed, and shall report any detection of federally or state listed species and/or violation to the County and applicable resources agencies, if needed within 48 hours of detection.

- Environmental training shall be provided for contractors and construction personnel by the Qualified Biologist prior to the start of construction work and annually thereafter. The training shall be repeated if gaps in construction operations are required.

4(b) The GPU EIR concluded this impact to be significant and unavoidable. As discussed under Section 4(a) above, the project would result in direct, permanent impacts to all on-site communities, consisting of non-native grassland, non-native woodland, disturbed habitat, and urban/developed lands. Implementation of the project would also result in direct, permanent impacts to off-site communities, consisting of disturbed habitat and urban/developed as a result of necessary utility and roadway improvements. Consistent with mitigation measure Bio-1.5 in the GPU EIR, the project would utilize the County's Guidelines for Determining Significance for Biological Resources to identify adverse impacts to biological resources. Specifically, in accordance with Table 5 of the County's Guidelines for Determining Significance for Biological Resources, impacts to non-native grassland would be significant requiring mitigation at the ratio of 0.5:1. Therefore, implementation of mitigation measure Bio-1, consistent with the GPU EIR mitigation measures Bio-1.5 and Bio-1.6, would reduce impacts to non-native grassland to a less than significant level.

Therefore, the project would be consistent with the analysis within the GPU EIR because it would not create new impacts, increase impacts, and there is no new information of substantial importance than identified within the GPU EIR.

4(c) The GPU EIR concluded this impact to be less than significant with mitigation. The Biological Resources Report (Merkel & Associates, Inc. 2025) determined that the project site is not located within a designated floodplain or floodway, nor are there any National Wetland Inventory or U.S. Geological Survey drainages identified on-site. There are no aquatic resources within the biological survey area that would be regulated under Sections 404 or 401 of the Clean Water Act, Porter-Cologne Water Quality Control Act, and/or California FGC Streambed Alteration Agreement Section 1600-1616. Therefore, the project would not result in impacts to any jurisdictional wetlands or waterways. No impact would occur.

The GPU EIR determined impacts to federally protected wetlands to be less than significant. The project would result in no impact for the reasons detailed above; 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.

4(d) The GPU EIR concluded this impact to be significant and unavoidable. The Biological Resources Report (Merkel & Associates, Inc. 2025) determined that the project site does not support typical features that can be identified as a wildlife corridor. Furthermore, the project site does not support any wildlife nursery sites. Therefore, the project would not result in impacts to wildlife movement or nursery sites, and impacts would be less than significant.

The GPU EIR determined impacts to regional wildlife corridors and linkages to be significant and unavoidable. As the project would have a less than significant impact for the reasons detailed above, the project would be consistent with the analysis 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.

4(e) The GPU EIR concluded this impact to be less than significant. The Biological Resources Report (Merkel & Associates, Inc. 2025) determined that the project would be consistent with the County Multiple Species Conservation Program, Biological Mitigation Ordinance, and the County Resource Protection Ordinance because mitigation would be required to

compensate for the loss of significant habitat. The project would not conflict with the provisions of any adopted habitat conservation plan; natural communities conservation plan; other approved local, regional, or state habitat conservation plan; or any other local policies or ordinances that protect biological resources.

As previously discussed, the GPU EIR determined impacts on local policies and ordinances as well as habitat conservation plans and natural community conservation plans to be less than significant. As the project would result in a less than significant impact for the reasons detailed above, the project would be consistent with the analysis within the GPU EIR because it would not create new impacts, increase impacts, and there is no new information of substantial importance than identified within the GPU EIR.

Conclusion

The project could result in potentially significant impacts to biological resources. However, further environmental analysis is not required due to the following:

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. Mitigation measures Bio-1, Bio-2, Bio-3, and Bio-4 as outlined above are consistent with the GPU EIR mitigation measures Bio-1.5, Bio-1.6, and Bio-1.7, which would be applied to the project.

5. 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 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 responses are based on the Negative Archaeological Resources Survey Report prepared by RECON (2025b) and the Architectural and Historic Evaluation of Structures prepared by Recuerdos Research (2024).

5(a) The GPU EIR concluded this impact to be less than significant with mitigation. As discussed in the Negative Archaeological Resources Survey Report (RECON 2025b), a records search was requested from the California Historical Resources Information System, South Coastal Information Center to identify any previously recorded cultural resources within a one-mile radius of the project area of potential effect (APE). The APE consists of the 10.39-acre project site. The South Coast Information Center records search indicated that one previously recorded cultural resource (P-37-012531) was recorded, within the project site, in 1991 by ERC Environmental as a historic house complex with associated trash scatter along with a possible prehistoric lithic scatter. A subsequent Architectural and Historic Evaluation of Structures (Recuerdos Research 2024) prepared an assessment of P-37-012531. The Architectural and Historic Evaluation of Structures determined that the existing residence located at 830 Idaho Avenue represents a modified 1912 family residence and does not merit its inclusion in the County Local Register of Historic Resources or the California Register of Historic Resources. The residence also does not qualify as an important resource under the County Resource Protection Ordinance. Additionally, the past residents were found to not be significant historic figures or civic leaders in Escondido region. Therefore, demolition of the existing residence would not constitute an adverse effect or impact upon significant historical or architectural resources. Impacts on a historic resource would be less than significant.

As previously discussed, the GPU EIR determined impacts on historic resources to be less than significant with mitigation. In addition, the project would result in less than significant impact to historic resources. Therefore, the project would be consistent with the analysis within the GPU EIR because it would not create new impacts, increase impacts, and there is no new information of substantial importance than identified within the GPU EIR.

5(b) The GPU EIR concluded this impact to be less than significant with mitigation. As discussed in the Negative Archaeological Resources Survey Report (RECON 2025b), a records search was requested prior to the pedestrian survey on September 30, 2024, from the California Historical Resources Information System, South Coast Information Center to identify any previously recorded cultural resources within a one-mile radius of the APE.

The South Coast Information Center records search indicated that there have been 58 cultural investigations conducted within one mile of the project APE, seven of which include the project APE. The records search also indicated that 447 cultural resources are recorded within one mile of the project APE: six are prehistoric (one of which is an isolate), 438 are historic-era resources, and three resources comprise both prehistoric and historic resources (multicomponent). The prehistoric sites include lithic scatters, lithic scatters with ground stone, ceramic scatters, and bedrock milling features. The prehistoric isolate is a hammerstone. Historic resources include single-family properties, 1-to-3-story commercial buildings, ancillary structures, educational buildings, religious buildings, foundations, trash scatters, trees, walls, mines, and roads. The multicomponent sites comprise lithic scatters, lithic scatter with ground stone, single-family properties, trash scatters, and foundations. Also included within the buffer are 441 historic addresses. One previously recorded cultural resource occurs within the APE (P-37-012531).

A RECON archaeologist performed a pedestrian survey of the approximately 10.39-acre project site on September 30, 2024. The RECON archaeologist was accompanied by two monitors from the Rincon Band of Luiseño Indians. No prehistoric or historic archaeological material was observed within the project APE during the survey. The historic component of the multicomponent site P-37-012531 was observed during the survey. The mapped isolated prehistoric component—the fine-grained metavolcanic flake and marine shell fragment—were not observed. No previously unrecorded prehistoric or historic archaeological material were observed during the survey. Furthermore, the Architectural and Historic Evaluation of Structures (Recuerdos Research 2024) provided an assessment of P-37-012531 and determined that it does not qualify as an important resource under the California Register of Historic Resources or County Resource Protection Ordinance.

Consistent with the GPU EIR, potential impacts to cultural resources would be mitigated through ordinance compliance and through compliance with the County's Guidelines for Significance–Cultural Resources if resources are encountered. The GPU EIR identified these mitigation measures as Cul-2.5. Implementation of mitigation measure Cul-2.5 in the GPU EIR, requiring archeological and native American monitoring, would reduce impacts to archeological resources to a less than significant level.

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.

5(c) The GPU EIR concluded this impact to be less than significant. Unique geologic features are not common in the County, and the project 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 project site support any known geologic characteristics that have the potential to support unique geologic features.

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.

5(d) The GPU EIR concluded this impact to be less than significant with mitigation. A review of Figure 2, Paleontological Resources Potential and Sensitivity, in the County's Guidelines for Determining Significance for Paleontological Resources show that the project site is not located within a sensitive paleontological area.

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.

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. Project impacts would 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 regard to the issue area of cultural/paleontological resources, the following findings can be made:

1. No peculiar impacts to the project or its site have been identified.

2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.

3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.

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

6. Energy Use

Would the project:

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
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 greenhouse gas (GHG), while protecting public health and contributing to a more sustainable environment. Policies COS-15.1, COS-15.2, and COS-15.3 would support this goal by encouraging design and construction of new buildings and upgrades of existing buildings to maximize energy efficiency and reduce GHG. Goal COS-17 promotes sustainable solid waste management. Policies COS-17.1 and COS-17.5 would support this goal by reducing GHG emissions through waste reduction techniques and methane recapture. The analysis below specifically analyzes the energy use of the project.

The following responses are based on the Climate Action Plan (CAP) Consistency Review Checklist prepared by RECON (2024) and the Air Quality Analysis prepared by RECON Environmental, Inc. (RECON 2025a).

6(a) The project would increase the demand for electricity at the project site, and gasoline consumption in the project site during construction and operation relative to existing conditions. The project would be all-electric and would not use any natural gas. CEQA requires mitigation measures to reduce "wasteful, inefficient and unnecessary" energy usages (California Public Resources Code §21100(b)(3). Neither the law nor the 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.

Construction

During construction, the project would consume energy in two general forms: (1) the fuel energy consumed by construction vehicles and equipment and (2) energy used in the manufacturing of construction materials, such as asphalt and pipes.

Construction of the project would require the use of construction vehicles and equipment for hauling and building activities. Equipment for these types of activities is discussed in detail in the Air Quality Analysis (RECON 2025a). The project would employ standard construction activities and equipment. Construction equipment requiring electricity would be gas-powered or diesel-powered. Construction would also include construction worker vehicles traveling to and from the project site. It is not anticipated that the crew of workers required on-site would be greater than average job sites of projects of similar size. The scale and density of the residential development is unlikely to result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources. Construction is likely to span approximately two years, generating approximately 3 to 25 worker vehicle trips a day from the local area during most construction phases, with one hauling trip during the demolition and grading phase and five vendor trips during the building construction phase. This is standard for a project of this size and scale per CalEEMod defaults based on the proposed land use and density for the project. Furthermore, there are no unusual project characteristics that would necessitate the use of construction equipment that would be less energy efficient than at comparable construction projects. Therefore, the proposed short-term construction activities would not result in inefficient, wasteful, or unnecessary fuel consumption, and impacts 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. The 2022 Energy Code increases on-site renewable energy generation from solar, increases electric load flexibility to support grid

reliability, reduces emissions from newly constructed buildings, reduces air pollution for improved public health, and encourages adoption of environmentally beneficial efficient electric technologies. 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 2022 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 2022 CALGreen includes residential mandatory 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, the project would implement measures consistent with the CAP. These measures include the installation of EV charging infrastructure in each garage, all-electric appliances, increase in renewable energy per 2022 CALGreen §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 plans that address renewable energy and energy efficiency are 2022 CALGreen, the 2022 Energy Code, and the Renewables Portfolio Standard (RPS). As discussed above in Section 6(a), the project would be required at a minimum to meet the mandatory energy requirements of the Energy Code and CALGreen in effect at the time of development. New construction and major renovations must demonstrate their compliance with the current Energy Code and CALGreen through submittal and approval of a Title 24 Compliance Report to the local building permit review authority and the California Energy Commission. The RPS promotes diversification of the state's electricity supply and decreased reliance on fossil fuel energy sources. The project would be served by San Diego Gas and Electric (SDG&E), who, under Senate Bill (SB) 350 (2015), is required to achieve a renewable energy mix goal of 60 percent by the year 2030. Based on the latest report to the legislature, SDG&E has obtained 59 percent renewables as of 2022 (California Public Utilities Commission 2023). Implementation of the project would not interfere with SDG&E's progress towards achieving RPS goals. In addition, the project would not conflict with the County's adopted CAP, which includes policies related to using energy more efficiently. 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.

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

Conclusion

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

1. No peculiar impacts to the project or its site have been identified.

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

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

7. Geology and Soils

Would the project:

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

Discussion

The following responses are based on the Geotechnical Investigation prepared by Christian Wheeler Engineering (2024).

7(a)(i) The GPU EIR concluded this impact to be less than significant. The Geotechnical Investigation (Christian Wheeler Engineering 2024) determined that the project site is not underlain by a known active fault. The nearest active fault zones include the Newport-Inglewood-Rose Canyon and Elsinore Fault Zones located approximately

17 and 16 miles west and northeast of the project site. Due to the project site's distance from a known fault, project impacts would be less than significant.

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

7(a)(ii) The GPU EIR concluded this impact to be less than significant. To ensure the structural integrity of all buildings and structures, the project would be required to conform to the Seismic Requirements as outlined within the California Building Code Project grading would also be required to comply with the County Grading Ordinance. Compliance would be verified in the field by a licensed or registered civil engineer and inspected by County grading inspectors. Therefore, compliance with the California Building Code, County Building Code, and County Grading Ordinance would ensure project impacts related to seismic activity would be less than significant.

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

7(a)(iii) The GPU EIR concluded this impact to be less than significant. The project is not within a "Potential Liquefaction Area" as identified in the County Guidelines for Determining the Significance for Geologic Hazards. Additionally, the project would be required to comply with the County's Grading Ordinance and Building Code. Therefore, compliance with the California Building Code and the County Building Code would ensure that the project would not result in a significant impact.

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

7(a)(iv) The GPU EIR concluded this impact to be less than significant. The Geotechnical Investigation (Christian Wheeler Engineering 2024) identified the project site as located within a Landslide Susceptibility Area classified as "generally susceptible". Although classified as "generally susceptible" to slope failures, the Geotechnical Investigation (Christian Wheeler Engineering 2024) determined that the underlying soils make slope instability unlikely. Therefore, project impacts would be less than significant.

As previously discussed, the GPU EIR determined impacts from exposure to seismic-related hazards and soil stability to be less than significant. As the project would have a less than significant impact, the project would be consistent with the analysis in the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance other than the information identified in the GPU EIR.

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

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

7(c) The GPU EIR concluded this impact to be less than significant. As indicated in 7(a)(iv) above, the project site is classified as "generally susceptible" to slope failures; however, the underlying soils make slope instability unlikely. Furthermore, as indicated in 7(a)(iii), the project site is not within a Potential Liquefaction Area. As such, the on-site geological formations are not expected to be unstable or become unstable as a result of the project. Furthermore, the project would adhere to the recommendations provided in the Geotechnical Investigation as a condition of approval to ensure geologic stability at the project site. Therefore, on-site geological formations are not expected to be unstable or become unstable as a result of the project, and impacts would be less than significant.

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

7(d) The GPU EIR determined impacts from expansive soils to be less than significant. The Geotechnical Investigation (Christian Wheeler Engineering 2024) determined that the project site is underlain by shallow human-placed and agriculturally disturbed artificial fill soil, surficial deposits of topsoil/colluvium and younger alluvium, Quaternary-age older alluvium, and Cretaceous-age granitic rock which have a low expansion potential. Furthermore, the project would comply with the California Building Code and County Grading Code and adhere to the recommendations provided in the Geotechnical Investigation as a condition of approval to ensure geologic stability at the project site.

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

7(e) The GPU EIR concluded this impact to be less than significant. The project would obtain an out-of-agency sewer service agreement through LAFCO to annex into the City of Escondido sanitation district for sewer service. The project would construct gravity sewer lines leading to a proposed on-site lift station, which would require installation of a public sewer force main within Idaho Avenue. As such, the project would not place septic tanks or alternative wastewater disposal systems on soils incapable of adequately supporting the tanks or system.

As previously discussed, the GPU EIR determined impacts to wastewater disposal systems to be less than significant. As the 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 regard to the issue area of Geology and Soils, the following findings can be made:

1. No peculiar impacts to the project or its site have been identified.

2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.

3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.

4. No mitigation measures contained within the GPU EIR would be required because project-specific impacts would be less than significant by adhering to the project conditions of approval, which are consistent with the GPU EIR.

8. Greenhouse Gas Emissions

Would the project:

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

Discussion

The following responses are based on the Climate Action Plan Consistency Review Checklist prepared by RECON (2024).

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 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 Village Residential VR-2 and the zoning is A70 (Limited Agriculture). The project would be consistent with these land use and zoning designations and would not require a rezone or GPA. The additional density permitted through the State Density Bonus Law does not constitute an inconsistency with land use and zoning designations. Although the project proposes to increase density to 42 lots through application of the State Density Bonus Law, it represents a state-authorized increase that is accounted for within the growth anticipated at General Plan buildout. 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 would not include cold storage or refrigerated warehouse facilities; therefore, this measure is not applicable.

- Install EV Charging Infrastructure–The project would install EV charging capabilities in each unit in accordance with the requirements of 2022 CALGreen §4.106.4.1 and §A4.106.8.1. For each dwelling unit, a dedicated 208/240-volt branch circuit shall be installed in the raceway required by §4.106.4.1. The branch circuit and associated overcurrent protective device shall be rated at 40 amperes minimum.

- Increase Active Transportation–The project would increase active transportation by constructing a new public sidewalk along its frontage of Idaho Avenue, connecting to existing pedestrian improvements at the intersection of Idaho Avenue and San Pasqual Valley Road. Additionally, the project would install an accessible ramp at the subdivision entrance, providing safe crossing on Idaho Avenue at Private Road A and pedestrian connectivity to internal sidewalks.

- Reduce Single-Occupancy Vehicle Trips–The County has not yet adopted a Transportation Demand Management Ordinance. Therefore, this measure is not applicable.

- Electrify Buildings and Appliances–The project will comply with the County's Code of Regulatory Ordinances as amended to incorporate all-electric appliances and equipment in new residential projects.

- Increase Renewable Energy–The project would comply with 2022 CALGreen voluntary Tier 2 measures required by this CAP measure. Consistency will be demonstrated on construction plans and CALGreen compliance documents prior to the issuance of building permits. This measure would be a project condition of approval.

- Increase Water Efficiency–The project would comply with 2022 CALGreen voluntary Tier 2 measures required by this CAP measure. The project proposes using three elective measures from 2022 CALGreen §A4.303, §A4.304, and §A4.305 as follows:

    - A4.303.1–Install low flow kitchen faucets
    - A4.303.3–Install at least one qualified Energy Star dishwasher or clothes washer
    - A4.304.1–Install a rainwater capture, storage, and re-use system

- Increase Tree Preservation–The program to preserve native trees is not in effect. Therefore, this measure is not applicable.

- Increase Tree Planting–The project would include the planting of two trees per dwelling unit for a total of 84 trees minimum in accordance with the County's Landscaping Ordinance.

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

9. Hazards and Hazardous Materials

Would the project:

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
a) Create a significant hazard to the public or the environment through the routine transport, storage, use, or disposal of hazardous materials or wastes or through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☐
b) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☐
c) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, or is otherwise known to have been subject to a release of hazardous substances and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☐
d) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐
e) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐
g) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	☐	☐	☐
h) Propose a use, or place residents adjacent to an existing or reasonably foreseeable use that would substantially increase current or future resident's exposure to vectors, including mosquitoes, rats or flies, which are capable of transmitting significant public health diseases or nuisances?	☐	☐	☐

Discussion

9(a) The GPU EIR concluded this impact to be less than significant.

Construction

During construction of the project, potentially hazardous materials would likely be handled on the project site. These materials would include gasoline, diesel fuel, lubricants, and other petroleum-based products required to operate and maintain construction equipment as well as specific materials for building construction, such as asphalt and concrete. Handling of these potentially hazardous materials would be temporary and would coincide with the short-term construction phase of the project. As required by California Health and Safety Code, and Titles 24 (Fire) and 22 (Hazardous Waste Management) of the California Code of Regulations, hazardous materials would be stored in designated areas away from environmentally sensitive areas in quantities that would not pose significant hazard to the public in the event of a release.

Although these materials would likely be stored on the project site, storage would be required to comply with the guidelines set forth by each product's manufacturer and with all applicable federal, state, and local regulations pertaining to the storage of hazardous materials. Consistent with federal, state, and local requirements, the transport of hazardous materials to and from the project site would be conducted by a licensed contractor. Any handling, transport, use, or disposal of hazardous materials would comply with all relevant federal, state, and local agencies and regulations, including the U.S. Environmental Protection Agency, the California Department of Toxic Substances Control (DTSC), the California Occupational Safety and Health Administration, Caltrans, the Resource Conservation and Recovery Act, and the SDAPCD. Therefore, construction of the project would not create a significant hazard to the public or the environment through routine transport, use, or disposal of hazardous materials, and impacts would be less than significant.

Operation

Project operation would require the use of limited amounts of hazardous materials such as common cleaning products, pesticides, and paint, all of which are routinely found in residential and commercial areas. The DTSC has primary regulatory authority for enforcing hazardous materials regulations. Additionally, state hazardous waste regulations are contained primarily in Title 22 of the California Code of Regulations. Furthermore, the California Occupational Safety and Health Administration has developed rules and regulations regarding worker safety around hazardous and toxic substances. If used, transported, and stored or disposed of properly, these materials do not pose a substantial risk or hazard to the public or the environment. Any potential impacts associated with the routine transport, use, or disposal of hazardous materials, although minimal, would be further minimized with adherence to applicable regulations. Therefore, operation of the project would not create a significant hazard to the public or the environment through routine use, transport, and 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. 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.

9(b) The GPU EIR concluded this impact to be less than significant. The nearest school to the project site is Escondido Christian School, which is located directly southeast of the project site. Although there is a school located within 0.25 miles of the project site, the project would not emit hazardous emissions, and the transport and handling of minor amounts of hazardous materials during construction and operation would comply with all applicable federal, state, and local regulations that control hazardous material handling. Furthermore, the project is required to comply with applicable regulations pertaining to hazardous waste to ensure that impacts related to hazardous emissions and schools are less than significant.

As previously discussed, the GPU EIR determined impacts from hazards to schools 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.

9(c) The GPU EIR concluded this impact to be less than significant. Review of DTSC Envirostor database (DTSC 2025) and the State Water Resources Control Board (SWRCB) Geotracker database (SWRCB 2025), determined that there are no contaminated sites on or adjacent to the project site. Therefore, the project site is not located on a list of hazardous materials sites compiled pursuant to Government Code §65962.5.

As previously discussed, the GPU EIR determined impacts from existing hazardous materials sites to be less than significant. As the project would have a less than significant impact for the reasons detailed above, the project would be consistent with the analysis 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.

9(d) The GPU EIR concluded this impact to be less than significant with mitigation because portions of the County are located within an Airport Land Use Compatibility Plan. For those projects, mitigation measures would be required consistent with the GPU Mitigation Framework. The closest airport to the project site is Ramona Airport, located approximately 9.5 miles to the southeast. Review of the Airport Land Use Compatibility Plan for Ramona Airport determined that the project site is not located within a safety zone or noise exposure zone (County of San Diego 2022). Because the project site is not located within a safety zone or noise exposure zone identified in the Ramona Airport Land Use Compatibility Plan, the project would not result in a safety hazard or excessive noise for people residing or working in the project area. No impact would occur.

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.

9(e) The GPU EIR concluded this impact to be less than significant with mitigation because portions of the County are located within one mile of a private airstrip. For those projects, mitigation measures would be required consistent with the GPU Mitigation Framework. The project site is not within one mile of a private airstrip. The project would not result in a safety hazard or excessive noise for people residing or working in the project area. No impact would occur.

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.

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.

(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.

(ii) San Diego County Nuclear Power Station Emergency Response Plan: The property is not within the San Onofre emergency planning zone.

(iii) Oil Spill Contingency Element: The project site is not located within the coastal zone.

(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.

(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

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. Review of the California Department of Forestry and Fire Protection's (CAL FIRE's) fire hazard severity zone (FHSZ) maps and data determined that the project site is not located within a State Responsibility Area or a very high FHSZ (CAL FIRE 2025). Furthermore, the project site is located within an urbanized portion of the County away from any urban/wildland interface. The project would be required to adhere to General Plan policies and County Building and Fire Code regulations relating to fire safety. Therefore, the project would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires, and impacts would be less than significant.

As previously discussed, the GPU EIR determined impacts from wildland fires to be significant and unavoidable. As the project would have a less than significant impact for the reasons detailed above, the project would be consistent with the analysis 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.

9(h) The GPU EIR concluded impacts related to vectors to be 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 (artificial lakes, agricultural ponds, etc.). Also, the project does not involve or support uses that would produce or collect animal waste, such as equestrian facilities, agricultural operations (chicken coops, dairies, etc.), solid waste facilities, or other similar uses. Therefore, the project would not substantially increase current or future residents' exposure to vectors, including mosquitoes, rats, or flies.

As previously discussed, the GPU EIR determined impacts from vectors to be less than significant impacts with mitigation. 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.

Conclusion

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

1. No peculiar impacts to the project or its site have been identified.

2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.

3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.

4. No mitigation measures contained within the GPU EIR would be required because project-specific impacts would be less than significant by adhering to the project conditions of approval, which are consistent with the GPU EIR.

10. Hydrology and Water Quality

Would the project:

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

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
k) Expose people or structures to a significant risk of loss, injury or death involving flooding?	☐	☐	☐
l) Expose people or structures to a significant risk of loss, injury or death involving flooding as a result of the failure of a levee or dam?	☐	☐	☐
m) Inundation by seiche, tsunami, or mudflow?	☐	☐	☐

Discussion

The following responses are based on the Storm Water Quality Management Plan prepared by Touchstone Communities (2025a) and the Preliminary Drainage Study prepared by Touchstone Communities (2025b).

10(a) The GPU EIR concluded this impact to be significant and unavoidable. Development projects have the potential to generate pollutants during both the construction and operational phases.

During the construction phase, the project would prepare and implement a Storm Water Pollution Prevention Plan (SWPPP). The SWPPP would implement the following typical erosion control BMPs: hydraulic stabilization hydroseeding and bonded fiber matrix or stabilized fiber matrix on disturbed slopes; County-standard lot perimeter protection detail for erosion control on disturbed flat areas; energy dissipater outlet protection for water velocity control; silt fencing, fiber rolls, gravel and sand bags, and storm drain inlet protection for sediment control; stabilized construction entrance, street sweeping and vacuuming for off-site tracking of sediment; and measures to control materials management and waste management. The SWPPP would be prepared in accordance with Order No. 2009-009-DWQ, National Pollutant Discharge Elimination System Order CAS000002 Construction General Permit (CGP) adopted by the SWRCB on September 2, 2009.

As determined in the SWQMP (Touchstone Communities 2025a), and consistent with GPU EIR mitigation measures (Hyd-1.2 through Hyd-1.5) and GPU Policy 6.5, the project includes a combination of site design, source control, and stormwater BMPs to reduce impacts associated with water quality standards. The project would include a biofiltration basin located on the southeastern portion of the project site to treat and detain runoff prior to discharging off-site. The biofiltration basin is designed to convey storm water runoff for the 6-hour, 100-year storm event which is consistent with the County's Hydrology Manual (County of San Diego 2003). The SWQMP has been prepared in accordance with the County's BMP Design Manual, which is a design manual for compliance with the County's Watershed Protection Ordinance (§67.801 et seq.), and San Diego Region Order No. R9-2013-0001 Municipal Separate Storm Sewer System (MS4) Permit (2013) requirements for storm water management, as adopted by the Regional Water Quality Control Board (RWQCB) on May 8, 2013 The project's conformance to the waste discharge requirements of both the CGP and MS4 storm water permits listed above ensures the project would not create cumulatively considerable water quality impacts and

addresses human health and water quality concerns. Therefore, the project would not contribute to a cumulatively considerable impact to water quality from waste discharges.

As previously discussed, the GPU EIR determined impacts to water quality standards and requirements to be significant and unavoidable. As the project would have a less than significant impact on water quality standards through ordinance compliance as detailed above, the project would be consistent with the analysis within the GPU EIR because it would not create new impacts, increase impacts, and there is no new information of substantial importance than identified within the GPU EIR.

10(b) The GPU EIR concluded this impact to be significant and unavoidable. The project is located in the Hodges hydrologic subarea (905.2) of the San Dieguito Watershed hydrologic unit (905). Several water bodies within the Hodges system have been listed as impaired under Section 303(d) of the Clean Water Act. This list includes Lake Hodges, which has been recognized as being affected by mercury, nitrogen, phosphorus, manganese, turbidity, and pH, among other pollutants. Felicita Creek is also considered impaired for total dissolved solids and aluminum (Project Clean Water 2025). As the project site is not a tributary to any of these impaired water bodies, potential project-related impacts would be limited to runoff-related contributions of listed pollutants.

The project would comply with the County's Watershed Protection Ordinance and implement site design measures, source control BMPs, and structural BMPs to prevent a significant increase of pollutants to receiving waters during project construction and operation as described in Section 10(a). Implementation of construction and operational BMPs for water quality would ensure less than significant impacts related to an increase in pollutants for which the water body is impaired.

As previously discussed, the GPU EIR determined impacts to water quality standards and requirements significant and unavoidable. However, the project would have a less than significant impact on water quality standards and requirements with implementation of the BMPs described in the project-specific SWQMP (2025a), consistent with GPU EIR mitigation measures (Hyd-1.2 through Hyd-1.5) and GPU Policy 6.5. 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(c) The GPU EIR concluded this impact to be significant and unavoidable. As stated in responses 10(a) and 10(b) above, implementation of BMPs and compliance with required ordinances would ensure that project impacts are less than significant. As previously discussed, the GPU EIR determined significant and unavoidable impacts to water quality standards and requirements and groundwater supplies and recharge. However, the project would have a less than significant impact with mitigation to water quality standards and requirements and groundwater supplies and recharge (Hyd-1.2 through Hyd-1.5). Therefore, the project would be consistent with the analysis within the GPU EIR because it would not create new impacts, increase impacts, and there is no new information of substantial importance than identified within the GPU EIR.

10(d) The GPU EIR concluded this impact to be significant and unavoidable due to portions of the County which rely on groundwater. The project would not use any groundwater. Although the project would increase the amount of impervious surface on-site from 16,000 square feet to 168,071 square feet, the project would include approximately 268,329 square feet of pervious areas that would allow for groundwater recharge. Furthermore,

water would continue to infiltrate through undeveloped land throughout the groundwater basin. Therefore, the project would not 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, and impacts would be less than significant.

As previously discussed, the GPU EIR determined impacts to groundwater supplies and recharge significant and unavoidable. As the project would have a less than significant impact on groundwater recharge, the project would be consistent with the analysis within the GPU EIR because it would not create new impacts, increase impacts, and there is no new information of substantial importance than identified within the GPU EIR.

10(e) The GPU EIR concluded this impact to be less than significant with mitigation. The project would include a biofiltration basin located on the southeastern portion of the project site to treat and detain runoff prior to discharging off-site. The biofiltration basin is designed to convey storm water runoff for the 6-hour, 100-year storm event which is consistent with the County's Hydrology Manual. The SWQMP has been prepared in accordance with the County's BMP Design Manual, which is a design manual for compliance with the County's Watershed Protection Ordinance (§67.801 et seq.), and San Diego Region Order No. R9-2013-0001 MS4 Permit (2013) requirements for stormwater management, as adopted by the RWQCB on May 8, 2013. The project's conformance to the waste discharge requirements of both the CGP and MS4 storm water permits listed above ensures the project would not result in substantial erosion or siltation on- or off-site.

As previously discussed, the GPU EIR determined impacts related to erosion or siltation would be significant and unavoidable. However, the project would have a less than significant impact on erosion or siltation with the implementation of project BMPs, consistent with GPU EIR mitigation measures (Hyd-1.3, Hyd-1.5, Hyd-3.1 through Hyd-3.3, Hyd-6.1, and Hyd-8.2). 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(f) The GPU EIR concluded this impact to be less than significant with mitigation. The project would include a biofiltration basin located on the southeastern portion of the project site to treat and detain runoff prior to discharging off-site. The biofiltration basin is designed to convey storm water runoff for the 6-hour, 100-year storm event which is consistent with the County's Hydrology Manual. The SWQMP has been prepared in accordance with the County's BMP Design Manual (2019), which is a design manual for compliance with the County's Watershed Protection Ordinance (§67.801 et seq.), and San Diego Region Order No. R9-2013-0001 MS4 Permit (2013) requirements for stormwater management, as adopted by the RWQCB on May 8, 2013. The project's conformance to the waste discharge requirements of both the CGP and MS4 storm water permits listed above ensures the project would not result in flooding on- or off-site.

As previously discussed, the GPU EIR determined impacts to flooding to be less than significant with mitigation. The project would have a less than significant impact with regard to flooding with design features and improvements consistent with GPU EIR mitigation measures (Hyd-1.2 through Hyd-1.5). 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(g) The GPU EIR concluded this impact to be less than significant with mitigation. As determined in the Preliminary Drainage Study (Touchstone Communities 2025b), implementation of the project would reduce the 100-year peak flow rate from 93.39 cubic feet per second to 82.19 cubic feet per second. 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 to exceed capacity of stormwater systems to be less than significant with mitigation. With implementation of treatment control BMPs, the project would have a less than significant impact with regard to exceeding the capacity of stormwater systems. 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 this impact to be significant and unavoidable. As stated in responses 10(a) and 10(b) above, implementation of BMPs and compliance with required ordinances would ensure that potential pollutants would be reduced to the maximum extent practicable. Therefore, the project would not provide substantial additional sources of polluted runoff.

As previously discussed, the GPU EIR determined impacts to water quality standards and requirements to be significant and unavoidable. The project would have a less than significant impact with regard to additional sources of polluted runoff with incorporation of design features and improvements consistent with GPU EIR mitigation measures (Hyd-1.2 through Hyd-1.5). 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(i) The GPU EIR concluded this impact to be less than significant with mitigation. No Federal Emergency Management Agency or County mapped floodplains were identified on the project site. Therefore, the project would not place housing within a County or federal floodplain or floodway.

As previously discussed, the GPU EIR determined impacts from housing within a 100-year flood hazard area 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.

10(j) The GPU EIR concluded this impact to be less than significant with mitigation. No Federal Emergency Management Agency or County mapped floodplains were identified on the project site. The project would therefore not place structures within a flood hazard area which would impede or redirect flood flows.

As previously discussed, the GPU EIR determined impacts from housing within a 100-year flood hazard area 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.

10(k) The GPU EIR concluded this impact to be less than significant with mitigation. As discussed in Section 10(j) above, the project does not propose development within any identified special flood hazard area. 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.

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

The project site is not within a Dam Inundation Zone (California Department of Water Resources 2025). Therefore, the project would not 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.

As previously discussed, the GPU EIR determined impacts from dam inundation, flood hazards, and emergency response and evacuation plans to be less than significant with mitigation. The project would have a less than significant impact for the reasons detailed above. Therefore, the project would be consistent with the analysis 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(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.

(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.

(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.

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

1. No peculiar impacts to the project or its site have been identified.

2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.

3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.

4. Feasible mitigation measures contained within the GPU EIR (Hyd-1.2 through Hyd-1.5, Hyd-3.1 through Hyd-3.3, Hyd-6.1, and Hyd-8.2) would be applied to the project. The mitigation measures, as detailed above, require compliance with the County's Guidelines for Determining Significance for Hydrology and Water Quality as well as for Dam Inundation, the Watershed Protection Ordinance, Stormwater Standards Manual, and the Resource Protection Ordinance.

11. Land Use and Planning

Would the project:

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
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. The project is located within an urbanized environment with small pockets of undeveloped land. The project site is surrounded by single-family residential uses to the north, south, and west; a church to the southeast; and a garden center to the east. The proposed single-family residential lots would be similar to the adjacent residential uses to the north, south, and west. Similarly, the project would not alter the existing circulation network, and changes would be limited to constructing a driveway connection to Idaho Avenue. Therefore, the project would not physically divide an established community, and impacts would not be significant.

As previously discussed, the GPU EIR concluded that physically dividing an established community is less than significant with mitigation. The project would have a less than significant impact for the reasons detailed above. Therefore, the project would be consistent with the analysis 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.

11(b) The project would not require a zone change or general plan amendment. The site's current land use designation, Village Residential (VR-2), permits two dwelling units per acre, allowing a base density of 21 lots. The project proposes to increase this to 42 lots through application of the Density Bonus Law, as amended by AB 1287, by reserving 29 percent (seven lots) of the base density units for very low- and moderate-income households. Specifically, 15 percent of the base density (four lots) would be reserved for very low-income households, and an additional 14 percent of the base density (three lots) would be reserved for moderate-income households. Use of the Density Bonus Law renders the project consistent with the density and land use characteristics evaluated in the GPU EIR and represents an incremental component of the growth anticipated at General Plan buildout. Therefore, the project would be consistent with the density established by the existing land use designation. The project would not conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect, including policies of the General Plan and Community Plan.

As previously discussed, the GPU EIR determined impacts to conflicts with land use plans, policies, and regulations 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 regard to the issue area of Land Use and Planning, the following findings can be made:

1. No peculiar impacts to the Project or its site have been identified.

2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.

3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.

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

12. Mineral Resources

Would the project:

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

Discussion

12(a) The GPU EIR determined that impacts to mineral resources would be significant and unavoidable. The California Surface Mining and Reclamation Act required classification of land into Mineral Resource Zones (MRZs). The project site has been classified by the California Department of Conservation–Division of Mines and Geology (California DOC 1996) as being within an area of Potential Mineral Resource Significance (MRZ-3). However, the project site has no alluvium or mines and is surrounded by single-family residential uses to the north, south, and west; a church to the southeast; and a garden center to the east. Therefore, implementation of the project would not result in the loss of availability of a known mineral resource that would be of value since the mineral resource has already been lost due to incompatible land uses.

As previously discussed, the GPU EIR determined impacts to mineral resources to be significant and unavoidable. As the project would have a less than significant impact for the reasons detailed above, the project would be consistent with the analysis 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.

12(b) The GPU EIR concluded this impact to be significant and unavoidable. The project site is located in an MRZ-3 zone. There are no active mines on the project site. Therefore, no potentially significant loss of availability of a known mineral resource of locally important mineral resource recovery (extraction) site delineated on a local general plan, specific plan, or other land use plan would occur as a result of this project. 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.

Conclusion

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

1. No peculiar impacts to the project or its site have been identified.

2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.

3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.

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

13. Noise

Would the project result in:

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

The following responses are based on the Noise Analysis prepared by RECON (2025c). This Noise Analysis was prepared as required by GPU EIR mitigation measure Noi-1.1, which requires an acoustical analysis whenever a new development may result in any existing or future noise-sensitive land uses (NSLUs) being subject to on-site noise levels of 60 A-weighted decibels [dB(A)] community noise equivalent level (CNEL) or greater, or other land uses that may result in noise levels exceeding the "Acceptable" standard in the County's Noise Compatibility Guidelines (Table N-1 in the Noise Element).

13(a) The GPU EIR concluded this impact to be less than significant with mitigation. The area surrounding the project site consists of single-family residential uses to the north, south, and west, a church to the southeast, and a garden center to the east. The project would not expose people to potentially significant noise levels that exceed the allowable limits of the General Plan, Noise Ordinance, or other applicable standards for the reasons below.

General Plan Noise Element

Policy 4b addresses noise sensitive areas and requires projects to comply with a CNEL of 60 dB(A). Projects which could produce noise in excess of 60 CNEL are required to incorporate design measures or mitigation as necessary to comply with the Noise Element. The interior noise level standard is 45 CNEL.

Vehicle traffic noise levels were calculated as part of the Noise Analysis prepared for the project (RECON 2025c). The main source of traffic noise at the project site is vehicle traffic on San Pasqual Valley Road and Idaho Avenue. Existing and opening year peak hour traffic volumes without and with the project were obtained from the TIS prepared for the project (C2 Consulting Collective 2025), and future year 2050 traffic volumes were obtained from SANDAG Transportation Forecast Information Center (SANDAG 2024). The existing and opening year peak hour traffic volumes were used to determine if the project would result in a significant increase in traffic noise levels due to project-generated traffic, and the future year 2050 traffic volumes were used to calculate future on-site vehicle traffic noise levels and determine compatibility with the County's compatibility standards.

Vehicle traffic noise level contours across the project site and noise levels at specific receiver locations were calculated using SoundPLAN. Modeled noise levels are summarized in Table 4.

Table 4
On-Site Vehicle Traffic Noise Levels

Receiver	Without Barriers		With Barriers	
	1st Floor	2nd Floor	1st Floor	2nd Floor
1 – Lot 3	**65**	66	58	66
2 – Lot 2	**65**	66	58	66
3 – Lot 1	**65**	66	58	66
4 – Lot 42*	**62**	63	56	63
5 – Lot 41	59	60	57	59
6 – Lot 40	60	61	57	60
7 – Lot 39	60	61	54	61
8 – Lot 38	**61**	62	55	61
9 – Lot 37	**62**	63	55	62
10 – Lot 36	**63**	65	56	64
11 – Lot 35	**65**	68	58	66
12 – Lot 35	**67**	69	58	69
13 – Lot 34	**69**	70	60	70
14 – Lot 33	**65**	68	57	63
15 – Lot 22	**65**	67	57	62
16 – Lot 21	**69**	70	60	70
17 – Lot 21	**70**	71	60	71
18 – Lot 20	**70**	72	60	72
19 – Lot 20	**68**	71	60	71
20 – Lot 19	**65**	68	60	66

CNEL = community noise equivalent level; **Bold** = Backyard exceeds 60 CNEL
*Note that a five-foot barrier would be sufficient to reduce exterior noise levels to less than 65 CNEL; however, a six-foot barrier is required due to noise generated by the adjacent sewer lift station. Noise levels shown here conservatively represent noise reduction due to a five-foot barrier.

As shown, exterior noise levels would exceed 60 CNEL at the lots closest to Idaho Avenue (Lots 1 through 3, Lots 35 through 38, and Lot 42) and San Pasqual Valley Road (Lots 19 through 22 and Lots 33 through 35). To reduce noise levels at these lots to 60 CNEL or less, five-foot barriers along Idaho Avenue and six-to-eight-foot barriers along San

Pasqual Valley Road were modeled. As shown in Table 4, with incorporation of these barriers, exterior noise levels in future backyards would be reduced to 60 CNEL or less, consistent with GPU mitigation measure Noi-1.1. Cumulative roadway impacts to off-site residences adjacent to the project site are discussed in Section 13(c) below.
Interior noise levels can be reduced through standard construction techniques. When windows are closed, standard construction techniques provide various exterior-to-interior noise level reductions depending on the type of structure and window. According to the Federal Highway Administration's Highway Traffic Noise Analysis and Abatement Guidance, buildings with masonry façades and double-glazed windows can be estimated to provide a noise level reduction of 35 decibels (dB), while light-frame structures with double-glazed windows may provide noise level reductions of 20 to 25 dB (Federal Highway Administration 2011).

The interior noise level standard for residential uses is 45 CNEL. Standard light-frame construction would reduce exterior to interior noise levels by at least 20 dB. As shown in Table 4, noise levels would be as high as 72 CNEL at the second floor of the lots located closest to San Pasqual Valley Road and Idaho Avenue. While the proposed barriers would reduce noise levels to 60 CNEL or less at first-floor receivers, second-floor receivers would not get the same noise attenuation, and the evaluation of specific building components is required. The sound transmission class (STC) rating of windows, walls, and roofs is an integer value that rates how well a building component attenuates noise. The STC rating generally reflects the decibel reduction that a building component can achieve. Standard walls and roofs typically have STC ratings greater than 40, while window components have lower ratings; thus, this analysis focuses on the minimum required window STC ratings. Because a noise reduction of up to 27 dB(A) is required to achieve interior noise levels of 45 CNEL or less, window components with an STC rating of 27 or higher are required for the lots closest to Idaho Avenue (Lots 1 through 3, Lots 35 through 38, and Lot 42) and San Pasqual Valley Road (Lots 19 through 22 and Lots 33 through 35). With the installation of windows with an STC rating of 27 or higher, interior noise levels within the residences on these lots would be reduced to 45 CNEL and interior noise levels would be less than significant. Interior noise levels at all other lots would be 45 CNEL with standard light-frame construction and without consideration of specific building components.

Noi-1 (Consistent with Mitigation Measure Noi-1.1 in the GPU EIR):
Exterior noise levels at Lots 1 through 3, 19 through 22, 33 through 38, and 42 shall be reduced to the County Noise Element threshold of 60 CNEL. Noise reduction for exterior traffic noise impacts can be accomplished through an on-site noise barrier. Five-foot to eight-foot noise barriers as identified in Figure 6 in the Noise Analysis shall be constructed. The sound attenuation wall must be solid and free of cracks or holes. It can be constructed of masonry, wood, plastic, fiberglass, steel, or a combination of those materials, as long as there are no cracks or gaps, through or below the wall. Any seams or cracks must be filled or caulked. If wood is used, it can be tongue and groove and must be at least one-inch total thickness or have a density of at least 3.5 pounds per square foot.

Noi-2 (Consistent with Mitigation Measure Noi-1.1 in the GPU EIR):
Interior noise levels shall be reduced to the County threshold of 45 CNEL or less in all habitable rooms for the residences constructed on Lots 1 through 3, 19 through 22, and 33 through 42. Window and door components shall have a STC rating of 27 or greater. Appropriate means of air circulation and provision of fresh air shall be provided to allow windows to remain closed for extended intervals of time so that acceptable interior noise levels can be maintained. The County shall verify that these features will be installed as part of the building permit plan check process.

Noise Ordinance–Operational Noise

The noise sources on the project site after completion of construction are anticipated to be those that would be typical of any single-family residential neighborhood, such as vehicles arriving and leaving, children at play, and landscape maintenance machinery. None of these noise sources associated with residential uses are anticipated to violate the County's Noise Ordinance or result in a substantial permanent increase in existing noise levels. The project would include heating, ventilation, and air conditioning (HVAC) units. At this time, no plans are available that show the location of the proposed structures or HVAC locations in relation to property lines. However, noise generated by HVAC units is anticipated to be similar to any other single-family residential use and is not anticipated to exceed the County's Noise Ordinance limits. Additionally, each residential lot would include 5.5-foot vinyl fencing between each lot that would shield noise from the HVAC units to the adjacent lot. Therefore, impacts would be less than significant.

The project would also include the construction of a sewer lift station at the southern portion of the project site between Idaho Avenue and Lot 42. It would be a pre-packaged lift station manufactured by Pacific Southwest Industries and would consist of an in-ground fiberglass pump well with submersible pumps. The noise sources associated with the sewer lift station would include a blower fan and emergency generator. Because the pumps would be submerged and within a fiberglass pump well, they are not anticipated to generate audible noise levels at the adjacent properties. The lift station would be surrounded by a six-foot concrete masonry unit wall. The lift station would be equipped with an odor control system (The General 55P air pollution control barrier) with a blower fan. Based on manufacturer specifications, the blower fan generates a noise level of 85 dB(A) at five feet. Based on communications with a manufacturer representative, the fan operates on a programmable timer that cycles on for 15 minutes and off for 10 minutes to optimize air exchanges. With incorporation of these operational characteristics, the fan would generate an average hourly sound power level (L_{pw}) of 90.8 dB(A) L_{pw}. The fan can also be equipped with an enclosure mounted to the concrete pad. Noise levels due to the fan were modeled during the daytime and nighttime hours with installation of an enclosure. It was assumed that the enclosure would achieve at least a 5 dB reduction in noise.

The lift station would also include a Generac emergency generator. Based on manufacturer specifications, it produces a noise level of 64 dB(A) at 23 feet. The standby generator would only be used in emergencies when power is cut from the sewer lift station. However, generator maintenance would include periodic testing. It was assumed that the generator would run for 30 minutes during daytime hours only for testing purposes. A testing average hourly sound power of 85.9 dB(A) L_{pw} was modeled. The results are summarized in Table 5.

Table 5 Sewer Lift Station Noise Levels				
Receiver	Land Use	Applicable Noise Level Limits Daytime/Nighttime	Blower Fan and Emergency Generator Testing Noise Level (Daytime)	Blower Fan Only Noise Level (Nighttime)
1	Single Family Residential–Lot 1	50/45	35	33
2	Single Family Residential–Lot 42	50/45	46	44
3	Single Family Residential–Lot 41	50/45	37	34
4	Single Family Residential–Lot 40	50/45	37	35
5	Single Family Residential–Lot 39	50/45	33	31
6	Church	50/45	40	38
dB(A) L_{eq} = A-weighted decibels equivalent noise level				

As shown, noise levels generated at the sewer lift station are not anticipated to exceed the applicable County Noise Ordinance limits. Since barriers and a blower fan enclosure are required to achieve the noise levels summarized in Table 6, these measures would be required as noise mitigation. With implementation of mitigation measure Noi-3, operation of the lift station is not anticipated to exceed the County's Noise Ordinance limits, and impacts would be reduced to less than significant.

Noi-3 (Consistent with Mitigation Measure Noi-1.1 in the GPU EIR):
Noise levels generated by the sewer lift station shall be reduced to the noise level limits specified in the County's Municipal Code [50 dB(A) L_{eq} between 7:00 a.m. and 10:00 p.m. and 45 dB(A) L_{eq} between 10:00 p.m. and 7:00 a.m.] through implementation of the following measures:

a. The design of the sewer lift station shall include a six-foot-tall perimeter wall. In addition, the barriers identified in Figure 6 in the Noise Analysis shall be constructed. The sound attenuation walls must be solid and free of cracks or holes. It can be constructed of masonry, wood, plastic, fiberglass, steel, or a combination of those materials, as long as there are no cracks or gaps, through or below the wall. Any seams or cracks must be filled or caulked. If wood is used, it can be tongue and groove and must be at least one-inch total thickness or have a density of at least 3.5 pounds per square foot.

b. The sewer lift station blower fan shall be equipped with an enclosure. The enclosure shall achieve a minimum 5 dB(A) reduction in fan noise levels.

c. The emergency generator shall be tested during the daytime hours (7:00 a.m. to 10:00 p.m.) only.

Noise Ordinance–Construction Noise

Construction of the project would have the potential to result in temporary noise level increases as a result of operation of heavy equipment. County Noise Ordinance §36.409 states it is unlawful to operate construction equipment that exceeds an average sound level of 75 dB L_{eq} for an eight-hour period between 7 a.m. and 7 p.m. when measured at the boundary line of the property where the noise source is located or on any occupied property where the noise is being received.

Construction noise was calculated as part of the Noise Analysis prepared for the project (RECON 2025c). Project construction noise would be generated by diesel-engine driven construction equipment used for demolition of the existing single-family residence, site preparation and grading, building construction, loading, unloading, and placing materials and paving. Construction noise levels were modeled assuming the simultaneous use of an excavator, a loader, and a grader which would be the three loudest and most commonly used pieces of construction equipment. Together this equipment generates a noise level of 84.7 dB(A) L_{eq} at 50 feet, which is equivalent to a sound power of 116.3 dB(A) L_{pw}. Noise levels were modeled as an area source over the entire footprint of the project site. As calculated in the Noise Analysis, construction noise levels would range from 62 to 69 dB(A) L_{eq} at the adjacent properties. Construction noise levels are not anticipated to exceed 75 dB(A) L_{eq}. Although the existing adjacent residents would be exposed to construction noise levels that could be heard above ambient conditions, the exposure would be temporary. As construction activities associated with the project would comply with noise level limits from the County's Noise Ordinance, temporary increases in noise levels from construction activities would be less than significant.

Additionally, blasting or rock breaking with the use of a rock drill or hammer may be required during construction activities due to the presence of marginally rippable granite rock beneath the soil. The drilling/hammering and blasting activities would occur in one area then the grading equipment would relocate or remove the debris. The loudest equipment used during this process would be the excavator with a mounted pneumatic hammer, which is louder than a rock drill. Drilling/hammering would be followed by a blast. Together, an excavator with pneumatic hammer generates a noise level of 84.5 dB(A) L_{eq} at 50 feet which is equivalent to a sound power of 116.2 dB(A) L_{pw}. The blast itself generates a noise level of 74.0 dB(A) L_{eq} at 50 feet.

The need for these activities as well as exact location of these activities are not known at this time. Single-family residential uses are located in the vicinity of the project site as close as 30 feet from the project boundary. Based on the Geotechnical Investigation (Christian Wheeler Engineering 2024), marginally rippable granite may be encountered in the northwest portion of the project site within proposed Lots 11 and 12. Existing residential receptors are located 180 feet or more from this location. An excavator with pneumatic hammer generates a noise level of 84.5 dB(A) L_{eq} at 50 feet and the blast itself generates a noise level of 74.0 dB(A) L_{eq} at 50 feet. These noise levels would attenuate to the County's noise level limit of 75 dB(A) L_{eq} at approximately 150 feet. Thus, noise levels due to drilling and blasting activities at Lots 11 and 12 are not anticipated to exceed 75 dB(A) L_{eq}. However, the Geotechnical Investigation also indicates that hardrock "floaters" may be encountered within the rippable material locations; thus, the exact location of necessary drilling and blasting locations cannot be determined at this time. Should these activities occur within 150 feet of residential receivers, noise impacts would be potentially significant.

Additionally, the County's noise level limit for maximum impulsive noise is 82 dB(A) at residential receivers when measured at the boundary line of the property where the noise source is located or on any occupied property where the noise is received, for 25 percent of the minutes in the measurement period. An excavator with a pneumatic hammer generates a maximum noise level of 88 dB(A) L_{max} at 50 feet. This noise level would attenuate to 82 dB(A) L_{eq} at approximately 100 feet. Thus, if drilling/blasting activities are required within 100 feet of a residential receiver and are anticipated to occur more than 15 minutes in a given hour, impulsive noise impacts would be potentially significant.

It should be noted that all blasting operations must comply with the County's Consolidated Fire Code (2011) §3301.2, which establishes permitting and notification procedures.

Rock drilling and blasting activities, if required, have the potential to exceed the County's construction noise level limits and impulsive noise level limits should these operations occur within 100 feet of a residential receiver. Therefore, the following mitigation measure would be required in order to comply with the County's Noise Ordinance.

Noi-4 (Consistent with mitigation measure Noi-1.1 in the GPU EIR):
In order to comply with the applicable sections of the County Noise Ordinance, the contractor shall comply with the following requirements during blasting operations. Blasting shall only occur during grading activities and conclude prior to rough grading completion:

If blasting is deemed necessary during grading operations, the project applicant, or its designee, shall direct the designated contractor to obtain a Blasting Permit approved by the County Sheriff's Department prior to the first blast, and comply with all County requirements. Where potential exceedance of the County Noise Ordinance is expected, the blast drilling and monitoring plan shall identify mitigation measures shown to effectively reduce noise and vibration levels (e.g., altering orientation of blast progression, increased delay between charge detonations, presplitting) to be implemented to comply with the noise level limits of the County's Noise Ordinance, §36.409 and §36.410, the vibration-level limits of 1 inch per second peak particle velocity. Such measures shall be implemented by the proposed project applicant, or its designee, prior to the issuance of the Blasting Permit. Additionally, all proposed project phases involving blasting shall conform to the following requirements:

a. All blasts shall be performed by a blast contactor and blasting personnel licensed to operate in the County.

b. Each blast shall be monitored and recorded with an air-blast overpressure monitor and groundborne vibration accelerometer that is located outside the closest residence to the blast and is approved by the County Blasting shall not exceed 0.1 inch per second peak particle velocity at the nearest occupied residence, in accordance with the County's Noise Guidelines §4.3.

As previously discussed, the GPU EIR determined impacts to excessive noise levels to be less than significant with mitigation. The project would have a less than significant impact with mitigation. 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.

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

Human reaction to vibration is dependent on the environment the receiver is in, as well as individual sensitivity. For example, outdoor vibration is rarely noticeable and generally not considered annoying. Typically, humans must be inside a structure for vibrations to become noticeable and/or annoying (Federal Transit Administration (FTA) 2018). Based on several federal studies, the threshold of perception is 0.035 inches per second (in/sec) peak particle velocity (PPV), with 0.24 in/sec PPV being distinctly perceptible (Caltrans

2013). Based on best available data, impacts for hydraulic breakers, or hammers, and other non-transient sources such as those associated with project construction shall be considered significant if the PPV exceeds 0.1 in/sec. Vibration perception would occur at structures, as people do not perceive vibrations without vibrating structures.

Construction activities produce varying degrees of ground vibration, depending on the equipment and methods employed. While ground vibrations from typical construction activities rarely reach levels high enough to cause damage to structures, special consideration must be made when sensitive or historic land uses are near the construction site. The construction activities that typically generate the highest levels of vibration are blasting and impact pile driving. As discussed, blasting may be required during construction activities. When a blast is detonated, only a portion of the energy is consumed in breaking up and moving the rock. The remaining energy is dissipated in the form of seismic waves expanding rapidly outward from the blast, either through the ground (as vibration) or through the air (as air overpressure or airblast). Groundborne vibration would also be generated during the hammering or drilling activities required prior to the blast.

Vibration levels associated with the use of mounted impact hammers or drills are 0.089 in/sec PPV at 25 feet (FTA 2018). This vibration level would exceed the significance criteria of 0.1 in/sec PPV at distances of 23 feet or closest. There are no structures within 23 feet of the project site. Therefore, groundborne vibration impacts due to hammering or drilling would be less than significant.

Vibration levels associated with blasting are site-specific and are dependent on the amount of explosive used, soil conditions between the blast site and the receptor, and the elevation where blasting would take place (specifically, how far below surface elevation where bedrock would be encountered). At the current stage of project design, specifics, such as the explosive, blasting quantities, and exact locations, have not been identified. However, blasting operations must comply with the County's Consolidated Fire Code (2011) §3301.2 which establishes permitting and notification procedures. Additionally, implementation of mitigation measure Noi-4 would reduce potential significant impacts.

For all other construction activities, the equipment with the greatest potential to generate vibration would be a large bulldozer. According to the FTA, large bulldozers generate vibration levels of 0.089 in/sec PPV at 25 feet. Unlike blasting, which has the potential to occur only in specific locations on the project site, vibration levels due to all other equipment were assessed over the entire project site. The nearest structure is located as close as 30 feet from the project boundary. A vibration level of 0.089 in/sec PPV at 25 feet would attenuate to 0.073 in/sec PPV at 30 feet. While it may be barely perceptible, it would be less than 0.1 in/sec PPV. Furthermore, large construction equipment would work immediately adjacent to the property lines only for short periods of time and would be operating at greater distances from the adjacent structures as construction occurs throughout the entire project site. Therefore, aside from blasting activities, project construction would not generate excessive groundborne vibration or groundborne noise levels, and impacts would be less than significant.

Operation of the project would not generate groundborne noise or vibration. No impact would occur.

As previously discussed, the GPU EIR determined impacts to excessive groundborne vibration to be less than significant with mitigation. The project would have a less than

significant impact with implementation of mitigation measure Noi-4 (should blasting be required) and 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.

13(c) The GPU EIR determined impacts from permanent increase in ambient noise levels to be significant and unavoidable.

As discussed in Section 13(a), the project would not result in the exposure of NSLUs to significant noise due to on-site stationary sources (HVAC and sewer lift station). The project was also evaluated to determine if it would result in a significant increase in traffic noise at off-site NSLUs. The project would increase traffic volumes on local roadways. Noise level increases would be greatest nearest the project site, which would represent the greatest concentration of project-related traffic. Direct impacts were determined by comparing existing traffic volumes and noise levels with the existing condition plus the project at full buildout. Cumulative impacts were determined by comparing the future with project and no project conditions and determining the project's contribution to the future cumulative noise levels. A substantial increase is defined as a 10 dB increase, or greater over existing noise levels when existing and future noise levels are below the County's 60 CNEL standard, or a 3 dB increase when existing or future noise levels equal or exceed the County's 60 CNEL standard. As calculated in the Noise Analysis prepared, the direct increase in noise levels would range from 0.0 to 0.1 dB and the cumulative increase in noise levels would range from 0.1 to 0.2 dB. These are not audible increases in noise levels, and direct and cumulative off-site impacts would be less than significant.

As previously discussed, the GPU EIR determined impacts from a permanent increase in ambient noise levels to be significant and unavoidable. As the project would have a less than significant impact for the reasons detailed above, the project would be consistent with the analysis 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.

13(d) The GPU EIR concluded this impact to be less than significant with mitigation. 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. Additionally, should blasting be required, mitigation measure Noi-4 would be required. 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 a temporary increase in ambient noise levels to be less than significant with mitigation. As the project would have a less than significant impact with mitigation, 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.

13(e) The GPU EIR concluded this impact to be less than significant with mitigation. The project site is not within the boundaries of an Airport Land Use Plan and is not within two miles of a public-use airport or private airstrip. The nearest airport is Ramona Airport, located approximately 9.5 miles to the southeast. The project site is outside the noise contour for Ramona Airport. As such, the project would not expose residents to excessive noise

levels, and no impacts would occur. 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.

13(f) The GPU EIR concluded this impact to be less than significant with mitigation. The project is not located within a one-mile vicinity of a private airstrip. Therefore, the project would be consistent with the analysis 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 regard 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. Mitigation measures Noi-1, Noi-2, Noi-3, and Noi-4, as outlined above, are consistent with GPU EIR mitigation measure Noi-1.1, which would be applied to the project.

14. Population and Housing

Would the project:

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
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. A project could induce population growth in an area either directly, through the development of new residences or businesses, or indirectly, through the extension of roads or other infrastructure. The project site is designated as Village Residential (VR-2) in the County's General Plan and

zoned A70 (Limited Agriculture). The current land use designation of Village Residential (VR-2) allows two dwelling units per acre for a total of 21 lots. The project would utilize the Density Bonus Law as updated by AB 1287 to increase the density to 42 lots by reserving 29 percent (seven lots) of the base density units for very low- and moderate-income households, as follows: 15 percent of the base density (four lots) reserved for very low-income households plus an additional 14 percent of the base density (three lots) reserved for moderate-income households.

The project would accommodate population growth that is already anticipated within the County and would be consistent with planned housing growth under the County's 2021-2029 6th Cycle Housing Element Update. Furthermore, the project would not extend any existing roads or expand existing infrastructure facilities that could induce growth. Therefore, the project would not induce substantial unplanned population growth, either directly or indirectly, and impacts would be less than significant.

As previously discussed, the GPU EIR determined impacts from population growth to be less than significant. As the 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.

14(b) The GPU EIR concluded this impact to be less than significant. The project would demolish one existing single-family residence and construct 42 single-family residential units, thereby, resulting in a net increase of 41 residential units. Therefore, the project would not displace substantial numbers of existing housing and would instead increase housing within the City of Escondido. Impacts would be less than significant.

As previously discussed, the GPU EIR determined impacts from the displacement of housing to be less than significant. As the project would have a less than significant impact for the reasons detailed above, the project would be consistent with the analysis 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.

14(c) The GPU EIR concluded this impact to be less than significant. The project would demolish one existing single-family residence and construct 42 single-family residential units, thereby resulting in a net increase of 41 residential units. Therefore, the project would not displace substantial numbers of existing people and would instead increase housing within the City of Escondido. Impacts would be less than significant.

As previously discussed, the GPU EIR determined impacts from displacement of people to be less than significant. As the 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 regard 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.

15. Public Services

Would the project:

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance service ratios for fire protection, police protection, schools, parks, or other public facilities?	☐	☐	☐

Discussion

15(a) The GPU EIR concluded this impact to be less than significant with mitigation except for school services, which remained significant and unavoidable.

As determined in the County's fire availability form prepared for the project (Touchstone Communities 2024a), the Escondido Fire Department has adequate capacity and capability to serve the project. Escondido Fire Station 7 would serve the project and is located 2.3 miles north of the project site. Therefore, the project would not result in the need for new or physically altered fire protection facilities, and impacts would be less than significant.

The Escondido Police Department provides law enforcement services to the project site. The Escondido Police Department headquarters is located at 1163 Centre City Parkway, which is located approximately 2.37 miles northwest of the project site. The project site is located within the City of Escondido's sphere of influence and would accommodate population growth that is already anticipated in the City of Escondido. Furthermore, the addition of 42 lots would be consistent with planned housing growth under the City's 2021-2029 6th Cycle Housing Element Update, which is projected to increase from 49,211 units in 2020 to 55,826 units in 2040 (City Escondido 2021). Therefore, the project would

not result in the need for new or physically altered police protection facilities, and impacts would be less than significant.

The project received facility availability forms from Escondido Union School District (Touchstone Communities 2024b) and Escondido High School Union School District (Touchstone Communities 2024c). As determined in the forms, the project applicant would be required to pay applicable school fees in accordance with Education Code §17620 to the Escondido Union School District and Escondido Union High School Districts prior to the issuance of a building permit.

As previously discussed, the GPU EIR determined impacts to fire protection services, police protection services and other public services to be significant with mitigation while school services remained significant and unavoidable. As the project would have a less than significant impact for the reasons stated 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 regard to the issue area of Public Services, the following findings can be made:

1. No peculiar impacts to the project or its site have been identified.

2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.

3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.

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

16. Recreation

Would the project:

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
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 would accommodate population growth that is already anticipated within the County, and therefore would be consistent with planned housing growth under the County's 2021-2029 6th Cycle Housing Element Update. Furthermore, the project would be subject to Park Land Dedication Ordinance fees associated with the North County Metro Planning Area. As the project would have a less than significant impact for the reasons detailed above, the project would be consistent with the analysis within the GPU EIR because it would not create new impacts, increase impacts, and there is not new information of substantial importance compared to what is identified within the GPU EIR.

16(b) The GPU EIR concluded this impact to be less than significant with mitigation. The project would include approximately 46,461 square feet of common open space that would be maintained by the homeowners association. The project does not include recreational facilities or require the construction or expansion of recreational facilities. Therefore, the project would not have adverse physical effect on the environment caused by expansion or construction of recreational facilities. As the project would have a less than significant impact for the reasons detailed above, the project would be consistent with the analysis within the GPU EIR because it would not create new impacts, increase impacts, and there is not new information of substantial importance than identified within the GPU EIR.

Conclusion

With regard 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.

17. Transportation and Traffic

Would the project:

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

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

The following responses are based on the TIS prepared by C2 Consulting Collective (2025).

17(a) The GPU EIR concluded this impact to be significant and unavoidable. The TIS (C2 Consulting Collective 2025) determined that the project would generate approximately 396 trips per day, which includes approximately 29 AM peak hour trips and approximately 39 PM peak hour trips. The project would not create a conflict with any performance measures because with the addition of project trips, the circulation system does not degrade to below standards established in the GPU EIR. The County standard for the levels of service (LOS) on Mobility Element roads is LOS D. An objective of the GPU is to plan for growth while preserving the County's environmental, cultural, and historical resources. Surrounding intersection and roadway segment operations will remain at acceptable LOS with construction of the project. Specifically, the addition of the passing lane on Idaho Avenue between the project driveway and San Pasqual Valley Road will improve the LOS of that segment from D to C by increasing vehicle capacity. The project would not result in a substantial increase in the number of vehicle trips, volume of capacity ratio on roads, or congestion at intersections in relation to existing conditions.

The North County Transit District provides transit service to the project area. The closest bus stop is Bus Route 371 located approximately 0.48 miles north of the project site on San Pasqual Valley Road. The project would increase pedestrian infrastructure by constructing a new public sidewalk along its frontage of Idaho Avenue, connecting to existing pedestrian improvements at the intersection of Idaho Avenue and San Pasqual Valley Road. Additionally, the project would install an accessible ramp at the subdivision entrance, providing safe crossing on Idaho Avenue at Private Road A and pedestrian connectivity to internal sidewalks.. 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 to policies establishing measures of the effectiveness for the performance of the circulation system. As the project would have a less than significant impact for reasons stated 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.

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

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

As described in 17(a), surrounding intersection and roadway segment operations will remain at acceptable LOS with construction of the project.

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

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

future development. This measure will help reduce financial barriers associated with accommodating increased traffic and/or meeting LOS standards.

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

In addition, the project would implement the CAP Checklist requirements to increase active transportation by constructing a new public sidewalk along its frontage of Idaho Avenue, connecting to existing pedestrian improvements at the intersection of Idaho Avenue and San Pasqual Valley Road. Additionally, the project would install an accessible ramp at the subdivision entrance, providing safe crossing on Idaho Avenue at Private Road A and pedestrian connectivity to internal sidewalks.

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

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

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

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

As previously discussed, the GPU EIR concluded this impact to be significant and unavoidable. As the project would not conflict with an applicable congestion management program with payment into the TIF program, 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(c) The GPU EIR concluded this impact to be less than significant with mitigation. As discussed in Section 9(d), the project is not located within an Airport Land Use Compatibility Plan. The nearest airport to the project site is Ramona Airport, located approximately 9.5 miles to the southeast. Review of the Airport Land Use Compatibility Plan for Ramona Airport determined that the project site is not located within a safety zone or noise exposure zone (County of San Diego 2022). Furthermore, the project does not propose the construction of any structure equal to or greater than 150 feet in height that would constitute a safety hazard to aircraft and/or operations from an airport or heliport. Therefore, the project would be consistent with the analysis in the GPU EIR because it would not increase impacts identified in the GPU EIR.

17(d) The GPU EIR concluded this impact to be significant and unavoidable. The project would not substantially alter traffic patterns, roadway design, place incompatible uses (e.g., farm equipment) on existing roadways, or create curves, slopes or walls which would impede adequate sight distance on a road. The private driveways 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. Access to the project site would be via a new driveway connected to Idaho Avenue, which is a County maintained mobility element road. Internal driveways would be constructed to allow for vehicular access throughout. In addition, consistent with GPU EIR mitigation measure Tra-4.2, the project would implement the County Building and Fire Codes to ensure emergency vehicle accessibility through the project site.

As previously discussed, the GPU EIR determined impacts on emergency access to be less than significant with mitigation. The project would have a less than significant impact with the implementation of project conditions of approval for adherence to the County Building and Fire Codes, consistent with GPU EIR mitigation measure Tra-4.2. 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(f) The GPU EIR concluded this impact to be less than significant with mitigation. The project would increase the performance or safety of pedestrian infrastructure by constructing a new public sidewalk along its frontage on Idaho Avenue. Additionally, the project would install an accessible ramp from the project site to the existing public sidewalk. The project does not include any improvements which would inhibit the future performance of bicycle facilities or public transit facilities. Therefore, the project would not conflict with adopted

policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities.

As previously discussed, the GPU EIR determined impacts on alternative transportation to be significant and unavoidable. 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.

Conclusion

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

1. No peculiar impacts to the project or its site have been identified.

2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.

3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. Feasible mitigation measures contained within the GPU EIR would be applied to the project (Tra-4.2). The mitigation measures, as detailed above, would require the project applicant to comply with the County Public Road Standards, Guidelines for Determining Significance, coordinate with other jurisdictions to identify appropriate mitigation and implement the County Building and Fire Codes to ensure adequate services are in place.

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 2019, 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 Archaeological Resources Survey Report (RECON 2025b), and Section 5 Cultural Resources above, a RECON archaeologist performed a pedestrian survey of the approximately 10.39-acre project site on September 30, 2024. The RECON archaeologist was accompanied by two monitors from the Rincon Band of Luiseño Indians. 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 General Plan EIR Mitigation Measures Cul-2.5 and Cul-4.1, the project will still be conditioned to include Archaeological and Tribal Monitoring, as well as a Cultural Resources Treatment Agreement and Preservation Plan throughout all grading activities.

Consistent with General Plan EIR Mitigation Measures Cul 2.2, Cul-2.4, Cul-2.6, and Cul-4.1 and General Plan Policy-11.4 – Collaboration with Agencies and Jurisdictions, the County initiated coordination with California Native American tribes traditionally and culturally affiliated with the project site on February 20, 2026. Staff received general questions regarding the project. As of April 16, 2026, County staff have not received requests to further discuss the project. No Tribal Cultural Resources were identified during discussions and coordination with the tribes. As such, there are no impacts to tribal cultural resources.

As previously stated, impacts to Tribal Cultural Resources that were analyzed within the GPU EIR within Section 2.5, Cultural and Paleontological Resources 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.

19. Utilities and Service Systems

Would the project:

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
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. As discussed in Section 10(a), the project would include a biofiltration basin located on the southeastern portion of the project site to treat and detain runoff prior to discharging off-site. The biofiltration basin is designed to convey storm water runoff for the 6-hour, 100-year storm event which is consistent with the County Hydrology Manual. The SWQMP has been prepared in accordance with the County BMP Design Manual (2019), which is a design manual for compliance with local County Watershed Protection Ordinance (§67.801 et seq.), and San Diego Region Order No. R9-2013-0001 MS4 Permit (2013) requirements for stormwater management, as adopted by the RWQCB on May 8, 2013. The project's conformance to the waste discharge requirements of both the CGP and MS4

storm water permits listed above ensures the project would not exceed the wastewater treatment requirements of the RWQCB.

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

19(b) The GPU EIR concluded this impact to be less than significant with mitigation. The sewer service availability letter (Touchstone Communities 2025c) determined that the project site is within the City of Escondido's sphere of influence. The project would require an out-of-agency sewer service agreement including an IOA from LAFCO in order to be served by the City of Escondido. Furthermore, the project would be required to adhere to the conditions in the project service availability letter provided by the City of Escondido (City of Escondido 2025). Therefore, the project would not require the construction of new wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.

The water service availability letter (Touchstone Communities 2025d) determined that the project site is within the City of Escondido's sphere of influence and that the City of Escondido has adequate water supply available to serve the project. Furthermore, the project would be required to adhere to the conditions in the project service availability letter provided by the City of Escondido (2025). Therefore, the project would not require the construction of new water treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.

The GPU EIR determined impacts associated with new water and wastewater treatment facilities to be less than significant with mitigation. As the project would have a less than significant impact, 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.

19(c) The GPU EIR concluded this impact to be less than significant with mitigation. As discussed in Section 10(a), the project would include a biofiltration basin located on the southeastern portion of the project site to treat and detain runoff prior to discharging off-site. The new stormwater drainage facilities would not result in additional adverse physical effects beyond those already identified in other sections of this environmental analysis.

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

19(d) The GPU EIR concluded this impact to be significant and unavoidable. The water service availability letter (Touchstone Communities 2025d) determined that the project site is within the City of Escondido's sphere of influence and is eligible for public water service. Therefore, water service would be provided by the City of Escondido. Furthermore, the

project would be required to adhere to the conditions in the project service availability letter provided by the City of Escondido (2025). As the project would have a less than significant impact, the project would be consistent with the analysis provided in the GPU EIR because it would not increase impacts identified in the GPU EIR.

19(e) The GPU EIR concluded this impact to be less than significant with mitigation. The sewer service availability letter (Touchstone Communities 2025c) determined that the project site is within the City of Escondido's sphere of influence and the City of Escondido has adequate capacity to serve the project. The project would require an out-of-agency sewer service contract including an IOA from the LAFCO in order to be served by the City of Escondido. Furthermore, the project would be required to adhere to the conditions in the project service availability letter provided by the City of Escondido (2025). 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.

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. The project is consistent with the land use designation and zoning for the project site. Therefore, the GPU EIR adequately anticipated and described the impacts of the project related to generation of solid waste. The project would be consistent with the analysis within the GPU EIR because it would not create new impacts, increase impacts, and there is not new information of substantial importance than 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 regard 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.

20. Wildfire

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:

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

The following responses are based on the Fire Protection Plan prepared by Firewise2000, LLC (Firewise2000 2025).

20(a) The GPU EIR concluded this impact to be significant and unavoidable. The project site is surrounded by single-family residential uses to the north, south, and west; a church to the southeast; and a garden center to the east. The Fire Protection Plan (Firewise2000 2025) determined that the average number of residents per household in San Diego County is 2.81. The project would construct 42 single-family residential units, which would equate to approximately 118 residents and with the County average of two vehicles per household the development could contain approximately 84 vehicles. With 150,000 residents in the neighboring City of Escondido and with the project next to an intersection of a robust road system (San Pasqual Road and Idaho Avenue), it is unlikely the response plan or the evacuation plan would be adversely impacted. Furthermore, San Pasqual Road is located on the eastern boundary of the project and provides a robust north/south exit from the

project site via a paved two-lane road with center turn lanes, signals, and bike lanes. Idaho Avenue is along the southern boundary of the project and would serve as the primary feeder to the project. Idaho Avenue is also a paved two-lane road and provides exiting to the west and east of the project site. Access to the project site would be primarily from Idaho Avenue south-east of central Escondido. Access to the project site would be improved from current conditions by upgrading the access road to current code and installing an improved cul-de-sac for safe turning of fire apparatus. Additionally, all construction activities would be required to comply with the County's standards and regulations, such as providing the necessary on- and off-site access and circulation for emergency vehicles and services during the construction and operation phases. Therefore, the project would not interfere with an adopted emergency response plan or emergency evacuation plan, and impacts would be less than significant.

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. 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 or increase impacts, and there is no new information of substantial importance other than the information identified in the GPU EIR.

20(b) The GPU EIR concluded this impact to be significant and unavoidable. Review of CAL FIRE's FHSZ maps and data determined that the project site is not located within a State Responsibility Area or a very high FHSZ (CAL FIRE 2025). The Fire Protection Plan (Firewise2000 2025) determined that the predicted rate of spread in untreated fuels would be 144.1 feet per minute; however, with fuel treatment the rate of spread would be reduced to 47.1 feet per minute. The project would install three new fire hydrants and residential sprinkler systems which would lessen the potential impacts. In addition, the project would include three fuel modification zones for a total of 100 feet of fuel treatment. The three fuel modification zones would provide 100 feet of defensible space surrounding each home. Zone 0 would provide five feet of non-flammable space in the immediate area surrounding each structure. Zone 1 would include a minimum of 45 feet of defensible space along the outer edge of Zone 0. Zone 2 would provide an additional 50 feet of treated area where 50 percent of the flammable vegetation would be removed, decreasing the fuel load and fire intensity for potential fires approaching the project structures. Furthermore, implementation of fire safety standards would occur during the building permit process and is consistent with GPU EIR mitigation measure Haz-4.3. 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 in GPU EIR Section 2.7, Hazards and Hazardous Materials, and was determined to be significant and unavoidable. The project would have a less than significant impact with the implementation of GPU EIR Mitigation Measure Haz-4.3 for compliance with the Building and Fire Codes. 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.

20(c) The GPU EIR concluded this impact to be significant and unavoidable. The Fire Protection Plan (Firewise2000 2025) determined that the key to fire safety is the initial design of the homes and landscape and, critically, the ongoing maintenance of both standards. The project would include underground utilities, and no emergency water sources are required due to the robust nature of the surrounding water supply infrastructure. The project would

also install a new eight-inch water line, three fire hydrants, and include fire sprinkler systems in the residences which would reduce the time and fire department resources it would take to begin fire suppression operations, thereby reducing the fire impacts the project would have on fire department resources availability. Therefore, the project would not 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.

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 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.

20(d) The GPU EIR concluded this impact to be significant and unavoidable. The Fire Protection Plan (Firewise2000 2025) determined that due to the project's placement mid to base of slope on a small hill, there are no significant drainages running through the property. With only about 100 feet of additional hill above the site and a modest slope of 9 percent, the impact of water generated off-site would be minimal. The project would construct a biofiltration basin at the southeast corner which is the lowest portion of the project site. Furthermore, project grading would include swales and culverts upslope of the proposed residences to divert off-site and locally generated runoff from them. Therefore, the project would not expose people or structures to significant risk, including downslopes or downstream flooding or landslides, as a result of runoff, post-fire instability, or drainage changes.

The GPU EIR concluded significant and unavoidable impacts associated with wildfire under Section 2.7, Hazards and Hazardous Materials. However, the project would have a less than significant impact for the reasons detailed above. 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.

Conclusion

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

1. No peculiar impacts to the project or its site have been identified.

2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.

3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.

4. Feasible mitigation measures contained within the GPU EIR (Haz-4.3) would be applied to the project. These mitigation measures, as detailed above, require the project applicant to implement brush management and comply with the Building and Fire Codes.

Appendices

Appendix A – References Cited

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

Appendix C – County of San Diego Guidelines For Determining Significance and Report Format and Content Requirements, Transportation and Traffic

Appendix A

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

References

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

Bay Area Air Quality Management District (BAAQMD)
2022 California Environmental Quality Act Air Quality Guidelines.

C2 Consulting Collective
2025 Traffic Impact Study (TIS). October 10, 2025.

California Air Pollution Control Officers Association
2022 California Emissions Estimator model (CalEEMod). User's Guide Version 2022.1.

California Department of Conservation (DOC)
1996 Update of Mineral Land Classification: Aggregate Materials in the Western San Diego Production-Consumption Region. https://www.sandiegocounty.gov/content/dam/sdc/pds/ceqa/Soitec-Documents/Final-EIR-Files/references/rtcref/ch3.2.2/2014-12-19_CaliforniaDepartmentofConservation1997.pdf.

2025a California Important Farmland Finder. https://maps.conservation.ca.gov/DLRP/CIFF/. Accessed August 18, 2025.

2025b California Williamson Act Enrollment Finder, California Williamson Act Enrollment. https://gis.conservation.ca.gov/portal/home/webmap/viewer.html?webmap=18f7488c0a9d4d299f5e9c33b312f312. Accessed August 18, 2025.

2025c San Diego County Tsunami Hazard Areas. https://www.conservation.ca.gov/cgs/tsunami/maps/san-diego.

California Department of Forestry and Fire Services (CAL FIRE)
2025 Fire Hazard Severity Zones. https://experience.arcgis.com/experience/5065c998b4b0462f9ec3c6c226c610a9.

California Department of Transportation (Caltrans)
2013 Technical Noise Supplement. November.

2025 State Scenic Highway Map. https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways. Accessed August 8, 2025.

California Department of Water Resources
2025 Division of Safety of Dams. California Dam Breach Inundation Maps. https://fmds.water.ca.gov/webgis/?appid=dam_prototype_v2.

California Public Utilities Commission
2023 Renewables Portfolio Standard Annual Report to the Legislature. https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/office-of-governmental-affairs-division/reports/2023/2023-rps-annual-report-to-the-legislature.pdf.

Christian Wheeler Engineering
2024 Report of Geotechnical Investigation, Pasqual Heights Subdivision, 830 Idaho Avenue, Escondido, California. CWE 2240339.01. October 25.

Department of Toxic Substances Control (DTSC)
2025 Envirostor Database. https://www.envirostor.dtsc.ca.gov/public/map/?myaddress=550+west+el+norte+drive%2C+escondido.

Escondido, City of
2021 City of Escondido 6th Cycle Housing Element 2021-2029. https://www.hcd.ca.gov/housing-elements/docs/escondido-6th-draft032621.pdf

2025 Project Facility Availability–The Proposed Pasqual Heights Project–City of Escondido Water and Sewer Availability. Letter to Kerry Garza (Touchstone Communities). July 23.

Federal Highway Administration (FHWA)
2011 Highway Traffic Noise: Analysis and Abatement Guidance. FHWA-HEP-10-025. December 2011.

Federal Transit Administration (FTA)
2018 Transit Noise and Vibration Impact Assessment Manual. FTA Report No. 0123. Prepared by John A. Volpe National Transportation Systems Center. September 2018.

Firewise2000, LLC
2025 Final Fire Protection Plan, Pasqual Heights, APN 234-160-25. June 23.

Merkel & Associates, Inc.
2025 Biological Resource Letter Report Pasqual Heights Project (County of San Diego Record ID/Environmental Log No. PDS2024-TM-5657/PDS2024-ER-24-08-006). October 25, 2024. Revised October 20, 2025.

Office of Environmental Health Hazard Assessment (OEHHA)
2015 Air Toxics Hot Spots Program Guidance Manual for the Preparation of Risk Assessments (Guidance Manual), February.

Project Clean Water
2025 San Dieguito River Watershed Management Area. https://projectcleanwater.org/watersheds/san-dieguito-wma/?utm_source=chatgpt.com#hydrologic.

RECON Environmental, Inc. (RECON)
2024 Climate Action Plan Consistency Review Checklist for the Pasqual Heights Project. PDS20204-IC-24-053. October 23.

2025a Air Quality Analysis for the Pasqual Heights Project. October 23.

2025b Negative Archaeological Resources Survey Report for the Pasqual Heights Project. September 17.

2025c Noise Analysis for the Pasqual Heights Project. October 14.

Recuerdos Research
2024 Architectural and Historic Evaluation of Structures at 830 Idaho Avenue, Escondido, California, APN 234-160-25-00, RECORD ID: PDF 2024-IC-24-053. October 7.

San Diego Air Pollution Control District (SDAPCD)
2022 2022 Regional Air Quality Strategy.

San Diego Association of Governments (SANDAG)
2024 Transportation Forecast Information Center. ABM2+/2021 RP Volumes. Accessed on October 17, 2024.

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2003 San Diego County Hydrology Manual. https://www.sandiegocounty.gov/content/dam/sdc/dpw/FLOOD_CONTROL/floodcontroldocuments/hydro-hydrologymanual.pdf.

2010 Guidelines for Determining Significance and Report Format and Content Requirements for Biological Resources, Fourth Revision. Land Use and Environment Group; Department of Planning and Land Use; Department of Public Works. 33 pp. and Attachments A through C. https://www.sandiegocounty.gov/content/sdc/pds/procguid.html#biological.

2015 County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements: Agricultural Resources. Approved March 19, 2007. Revised June 23, 2015. https://www.sandiegocounty.gov/content/dam/sdc/pds/ProjectPlanning/docs/AG-Report-Format.pdf.

2021 County of San Diego Guidelines for Determining Significance Hydrology and Water Quality. https://www.sandiegocounty.gov/content/dam/sdc/pds/docs/Hydrology%20and%20Water%20Quality%20-%20FINAL%20Signed.pdf.

2022 Airport Land Use Commission and San Diego County Regional Airport Authority, Airport Land Use Compatibility Plan for Ramona Airport. https://www.san.org/DesktopModules/Bring2mind/DMX/API/Entries/Download?EntryId=15607&Command=Core_Download&language=en-US&PortalId=0&TabId=807.

State Water Resources Control Board (SWRCB)

2025 Geotracker Database. https://geotracker.waterboards.ca.gov/map/?CMD=runreport&myaddress=550+w+el+norte+parkway.

Touchstone Communities

2024a County of San Diego Planning & Development Services Zoning Division Project Availability – Fire Form for Assessor's Parcel Number 234-160-25-00. Completed by the Escondido Fire Department.

2024b County of San Diego Planning & Development Services Zoning Division Project Availability – School Form for Assessor's Parcel Number 234-160-25-00. Completed by the Escondido Union High School District.

2024c County of San Diego Planning & Development Services Zoning Division Project Availability – School Form for Assessor's Parcel Number 234-160-25-00. Completed by the Escondido Union School District.

2025a County of San Diego Storm Water Quality Management Plan (SWQMP) for Priority Development Projects

2025b Preliminary Drainage Study for Pasqual Heights

2025c County of San Diego Planning & Development Services Project Facility Availability– Sewer Form for Assessor's Parcel Number 234-160-25-00. Completed by the City of Escondido.

2025d County of San Diego Planning & Development Services Project Facility Availability– Water Form for Assessor's Parcel Number 234-160-25-00. Completed by the City of Escondido.

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