



County of San Diego

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May 19, 2022

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

Project Name: Hurrell Subdivision
Project Record Numbers: PDS2020-TPM-21279
Environmental Log Number: PDS2020-ER-20-14-011

APN(s): 392-070-07-00, 392-070-10-00

Lead Agency Name and Address:
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Project Location:
The proposed Hurrell Subdivision project (Project) is located within the unincorporated community of Lakeside in eastern San Diego County. The approximately 15.5-acre Project site is located at 12392 Lakeside Avenue, located within the Lakeside Community Plan area.

Project Applicant Name and Address:

General Plan
Community Plan: Lakeside
Regional Categories: Semi-Rural
Land Use Designations: Semi-Rural Residential (SR-1)
Density: SR-1
Floor Area Ratio (FAR) N/A

Zoning

Use Regulation: Limited Agricultural (A70) and General Impact Industrial (M54)
Minimum Lot Size: 1 du per acre
Special Area Regulation: N/A

Description of Project:

The proposed project is a Tentative Parcel Map to subdivide 15.5 acres into four lots and a remainder lot with an approximate 7.7-acre biological open space easement and associated improvements (Project). Project site improvements include widening of an existing private road, adding a cul-de-sac, installation of sewer and water pipes, as well as drainage basins. The proposed lots range in size from 1.01 acres to 10.4 acres. The project site is located 12392 Lakeside Avenue, located within the Lakeside Community Plan area within unincorporated San Diego County. The site is subject to the General Plan Semi-Rural Regional Category, Semi-Rural 1 (SR-1) Land Use Designation. Zoning for the site is Limited Agriculture (A70) and General Impact Industrial (M54). The site contains an existing single-family dwelling and a detached accessory dwelling unit that would be retained and a detached accessory agricultural building that would be converted to a single-family dwelling. Access would be provided by a private road connecting to Lakeside Avenue. The Project would be served by sewer from San Diego County Sanitation District and imported water from the Lakeside Water District. Earthwork would consist of cut and fill of 11,334 cubic yards of material.

Discretionary Actions:

The Project includes a discretionary permit for a Tentative Parcel Map.

Overview of 15183 Checklist

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

General Plan Update Program EIR

The County of San Diego General Plan Update (GPU) establishes a blueprint for future land development in the unincorporated County that meets community desires and balances the environmental protection goals with the need for housing, agriculture, infrastructure, and economic vitality. The GPU applies to all of the unincorporated portions of San Diego County and directs population growth and plans for infrastructure needs, development, and resource protection. The GPU included adoption of new General Plan elements, which set the goals and policies that guide future development. It also included a corresponding land use map, a County Road Network map, updates to Community and Subregional Plans, an Implementation Plan, and other implementing policies and ordinances. The GPU focuses population growth in the western areas of the County where infrastructure and services are available in order to reduce the potential for growth in the eastern areas. The objectives of this population distribution

strategy are to: 1) facilitate efficient, orderly growth by containing development within areas potentially served by the San Diego County Water Authority (SDCWA) or other existing infrastructure; 2) protect natural resources through the reduction of population capacity in sensitive areas; and 3) retain or enhance the character of communities within the unincorporated County. The SDCWA service area covers approximately the western one third of the unincorporated County. The SDWCA boundary generally represents where water and wastewater infrastructure currently exist. This area is more developed than the eastern areas of the unincorporated County, and would accommodate more growth under the GPU.

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

Summary of Findings

The Project is consistent with the analysis performed for the GPU EIR. Further, the GPU EIR adequately anticipated and described the impacts of the Project, identified applicable mitigation measures necessary to reduce Project specific impacts, and the Project implements these mitigation measures (see [http://www.sdcounty.ca.gov/PDS/gpupdate/docs/BOS_Aug2011/EIR/FEIR_7.00 -
_Mitigation Measures 2011.pdf](http://www.sdcounty.ca.gov/PDS/gpupdate/docs/BOS_Aug2011/EIR/FEIR_7.00_-_Mitigation_Measures_2011.pdf) for complete list of GPU Mitigation Measures.

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

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

- 1. The Project is consistent with the development density established by existing zoning, community plan or general plan policies for which an EIR was certified.**
The Project would subdivide a 15.5-acre property into 4 lots and a remainder lot, which is consistent with the development density established by the General Plan and the certified GPU EIR. The proposed subdivision lot design would comply with all applicable zoning requirements, including minimum lot size and setbacks.
- 2. There are no Project specific effects which are peculiar to the Project or its site, and which the GPU EIR Failed to analyze as significant effects.**
The subject property is no different than other properties in the surrounding area, and there are no Project specific effects which are peculiar to the Project or its site. The Project site is located in an area developed with similarly sized, estate residential lots with associated accessory uses. The property does not support any peculiar environmental features, and the Project would not result in any peculiar effects.

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

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

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

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

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

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

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

_____ Signature	May 19, 2022 Date
Jenna Roady Printed Name	Environmental Coordinator Title

CEQA Guidelines §15183 Exemption Checklist

Overview

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

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

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

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

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

Discussion

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

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

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

The project site is located on a parcel west of Lakeside Avenue and approximately 1,400 feet north of Channel Road, within the Lakeside Community Plan Area in the unincorporated County of San Diego. The El Capitan Reservoir is the closest RCA identified by the County of San Diego General Plan or Lakeside Community Plan located within the vicinity to the project site. However, this RCA is located approximately one mile to the northeast and is not visible from the project site.

The project site is located in the same vicinity as several public trails, including the Lakeside Avenue Pathway and the El Monte Valley River Trail. The 15.5-acre project site would be divided into 4 lots and a remainder lot, which will remain as residential uses. Therefore, the Project is consistent with the existing residential land uses surrounding the

Project site and would not detract from existing views from an adopted County or State Trail system.

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 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.

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

The Project site is not within the vicinity of a State Designated Scenic Highway; however, the County General Plan identifies roadways that are designated as scenic corridors within the Conservation and Open Space Element and have been included as part of the County Scenic Highway System. A designated scenic roadway located in the vicinity of the project site is State Route 67 (SR-67), located 160 feet to the east of the project site. Direct views are available to the eastern lower portions of the project site; however, views of the northwest portion where the subdivision is proposed, and future development would occur, would be minimal and brief due to intervening topography. In addition, the Project would be consistent with the surrounding single-family residential land uses and the Project would not substantially obstruct, interrupt, or detract from an existing scenic vista.

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

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

The Project site is currently developed with an existing single-family home, accessory dwelling unit, and detached accessory agricultural structure. The uses surrounding the Project site include rural residential, commercial, a public facility, and undeveloped land. The undeveloped land west of the Project site includes hillsides covered by coastal sage scrub. The public facility on the northern end of the project site includes an unmanned water tower. A commercial structure adjoins the site immediately to the south.

The Project would not detract from, or contrast with the existing visual character and/or quality of the surrounding areas for the following reasons: the Project is consistent with the General Plan density allowed on-site and the Project is in conformance with the

Lakeside Community Plan. The Project site is located within an area which is developed with similar uses. Additionally, the location, size, and design of the proposed use would be compatible with uses in the immediate area. The Project is similar to surrounding land use types.

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 with no required mitigation for the reasons detailed above. Therefore, the Project would be consistent with the analysis within the GPU EIR because it would not create new impacts, increase impacts, and there is no new information of substantial importance than identified within the GPU EIR.

- 1(d) The GPU EIR concluded this impact to be significant and unavoidable. The Project would create three new residential lots by dividing a 15.5-acre property into 4 lots and a remainder lot. The future uses in the project area would likely use outdoor lighting but is not located within Zone A of the County of San Diego Light Pollution Code (within twenty miles of the Mount Laguna Observatory or the Palomar Observatory). The Project is located within Zone B of the Light Pollution Code (at least twenty miles from the Mount Laguna Observatory or the Palomar Observatory) and would not adversely affect nighttime views or astronomical observations because the Project would be required to conform to the Light Pollution Code (Section 51.201-51.209) to prevent spillover onto adjacent properties and minimize impacts to dark skies. Compliance with the Code would be required prior to issuance of a building permit. The Code was developed by the County in cooperation with the lighting engineers, astronomers, and other experts to effectively address and minimize the impact of new sources 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.

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 with no required mitigation for the reasons detailed above. Therefore, the Project would be consistent with the analysis within the GPU EIR because it would not create new impacts, increase impacts, and there is no new information of substantial importance than identified within the GPU EIR.

Conclusion

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

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

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

– Would the Project:

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

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

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

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

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

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

2(a) The GPU EIR concluded this impact to be significant and unavoidable. Portions of the project site are underlain by prime soils, however, pursuant to the County Guidelines for Determining Significance, Agricultural Resources (Agricultural Resources Guidelines), the project site is not considered an agricultural resource. The site is not classified as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance on maps prepared pursuant to the Farmland Mapping and Monitoring Program (FMMP) of the California Resources Agency. The Project site has been mapped by the Farmland Mapping and Monitoring Program as “other land” and “Urban Builtup Land”, which are not considered significant agricultural land in the County of San Diego. Furthermore, the site does not contain an Active Agricultural Operation or have a history of agricultural production as defined by the Agricultural Resources Guidelines.

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

- 2(b) The GPU EIR concluded this impact to be less than significant with mitigation. The majority of the project site is zoned Limited Agriculture and a portion of the site is zoned General Impact Industrial, which is not within an agricultural zone. Although the Limited Agricultural Zone allows for agricultural uses (as well as residential uses) by-right, the project site is not considered an Agricultural Resource pursuant to the Agricultural Resources Guidelines.

In addition, the project site is not within an agricultural preserve or a Williamson Act Contract. The closest Contract or Preserve is located approximately 4.3 miles east of the Project site. The site is also not surrounded by agricultural use types. Pursuant to the Agricultural Resources Guidelines, impacts related to interface conflicts would usually be less than significant if the land uses are separated by 300 feet. Therefore, no indirect impacts are expected to occur to any offsite resources, and mitigation would not be required. Additionally, the Project is for the development of four lots and a remainder lot, which is compatible with the surrounding use types. Therefore, the Project would not conflict with existing zoning for agricultural use or a Williamson Act Contract.

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

- 2(c) Forestry Resources were not specifically analyzed under the GPU EIR because Appendix G of the State CEQA Guidelines was amended to include significance criteria for forestry resources after the release of the Notice of Preparation for the GPU EIR. The project site including any offsite improvements do not contain any forest lands as defined in Public Resources Code section 12220(g), therefore Project implementation would not result in the loss or conversion of forest land to a non-forest use. The outer edge of the Cleveland National Forest is located approximately 5.8 miles to the east of the project site. Thus, due to distance, the Project would have no impact on the Forest. In addition, the County of San Diego does not have any existing Timberland Production Zones. Therefore, project implementation would not conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland production zones.

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

- 2(d) Forestry Resources were not specifically analyzed under the GPU EIR because Appendix G of the State CEQA Guidelines was amended to include significance criteria for forestry resources after the release of the Notice of Preparation for the GPU EIR. As indicated in response 2(c), the Project site, or any off-site improvements, are not located near any forest lands. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

2(e) The GPU EIR concluded this impact to be significant and unavoidable. As mentioned above in responses 2(a) and 2(b), the site is developed with no active agricultural use types. The project site is zoned A70, Limited Agriculture and M54, General Impact Industrial. However, as mentioned above in response 2(a), the project site would not be considered an agricultural resource. The site is not classified as an important farmland category pursuant to FMMP. In addition, no active agricultural operations exist within the vicinity of the project site.

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 to agricultural 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.

Conclusion

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

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

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

e) Create objectionable odors affecting a substantial number of people?

Discussion

3(a) The GPU EIR concluded this impact to be less than significant. San Diego County is currently designated as a nonattainment area for the federal standards for ozone (O₃) as well as the state standards for O₃, particulate matter less than or equal to 10 microns (PM₁₀), and particulate matter less than or equal to 2.5 microns (PM_{2.5}). The RAQS and the region’s portion of the SIP are the region’s plans for attainment and maintaining air quality standards. The RAQS and SIP rely on information from CARB and San Diego Association of Governments (SANDAG), including projected growth, in order to project future emissions and determine from that the strategies necessary for the reduction of stationary source emissions through regulatory controls. Projects that propose development that is consistent with the land use designations and growth anticipated by the local general plans and SANDAG are, by definition, consistent with the RAQS and SIP. Projects that propose development that is greater than that anticipated by the local general plans and SANDAG may be in conflict with the RAQS and SIP, and further analysis is required.

The project would include construction activities and operation of up to 3 single-family homes. Construction activities would include grading, building construction, paving, and architectural coating. Grading operations associated with the construction of the project would be subject to the Grading Ordinance, which requires the implementation of dust control measures and San Diego County Air Pollution Control District (SDAPCD) Rule 55. Project grading is limited to a balanced cut and fill of 11,334 cubic yards. The project is consistent with the density established under the County General Plan and certified by the GPU EIR. Therefore, because the Project would not increase the density or intensity of the land assumed in the GPU EIR and would not result in growth beyond that assumed in SANDAG’s growth assumptions or in the General Plan projections, the project would not conflict with or obstruct implementation of the RAQs or SIP.

As previously discussed, the GPU EIR determined impacts on air quality plans to be less than significant with mitigation. As the proposed Project would have a less than significant impact for the reasons detailed above, the Project would be consistent with the analysis 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.

3(b) The GPU EIR concluded this impact to be significant and unavoidable. In general, air quality impacts from land use projects are the result of emissions from area sources (landscaping and consumer products), energy (natural gas and electricity), transportation (on-road mobile sources), and from short-term construction activities. The County has established Guidelines for Determining Significance for Air Quality (Air Quality Guidelines) which incorporate the San Diego Air Pollution Control District’s (SDAPCD) established air quality impact analysis Screening Level Thresholds (SLTs) for all new source review (NSR) in SDAPCD Rule 20.2 and Rule 20.3.

The Project would contribute to particulate pollution (PM₁₀), nitrogen oxide gases (NO_x), and volatile organic compounds (VOCs) emissions from construction/grading activities; however, emissions from grading and construction required for the project would be minimal, temporary and localized, resulting in pollutant emissions below the screening-level criteria established by the Air Quality Guidelines. In addition, the proposed development density of the project is consistent with the General Plan and was anticipated in the GPU EIR.

Operational emissions for the Project would be associated with vehicle trips to and from the Project site. The vehicle trip generation for the Project is expected to have approximately 40 ADT, which is not a significant addition of traffic to the area. According to the Bay Area Air Quality Management District CEQA Guidelines for Assessing the Air Quality Impacts of Projects and Plans, projects that generate less than 2,000 ADTs are below the screening-level criteria established by the LUEG guidelines for determining significance. The Project ADTs would be far below this threshold and would therefore not have a significant impact from vehicle emissions.

As previously discussed, the GPU EIR determined significant and unavoidable impacts to air quality violations. However, the Project would have a less-than-significant impact to air quality violations with the incorporation of Project conditions. 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.

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

The Project would contribute to particulate pollution (PM₁₀), nitrogen oxide gases (NO_x), and volatile organic compounds (VOCs) emissions from construction/grading activities; however, emissions from grading and construction required for the project would be minimal, temporary and localized, resulting in pollutant emissions below the screening-level criteria established by the Air Quality Guidelines. In addition, the proposed development density of the project is consistent with the General Plan and was anticipated in the GPU EIR.

Operation of the proposed project would result in emissions of criteria pollutants from motor vehicle travel, onsite combustion of natural gas for space and water heating, consumer products (cleaning supplies, kitchen aerosols, cosmetics, and toiletries), landscaping, and the re-application of architectural coatings. Operational emissions generated by the project are not expected to exceed the screening level thresholds for any criteria pollutants.

The project, as well as the past, present and future projects within the surrounding area, have emissions below the screening-level criteria established by the County Guidelines for Determining Significance for Air Quality. Therefore, the construction and operational emissions associated with the project are not expected to create a cumulatively considerable impact nor a considerable net increase of any non-attainment pollutant, including PM₁₀, PM_{2.5}, or any O₃ precursors.

As previously discussed, the GPU EIR determined significant and unavoidable impacts to non-attainment criteria pollutants. However, the Project would have a less-than-significant impact to non-attainment criteria pollutants with the incorporation of Project conditions. 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.

- 3(d) The GPU EIR concluded this impact to be significant and unavoidable. Air quality regulators typically define sensitive receptors as schools (Preschool – 12th Grade), hospitals, resident care facilities, day-care centers, residences, or other facilities that may house individuals with health conditions that would be adversely impacted by changes in air quality. The Project includes the subdivision of 15.5 acres into four lots and a remainder lot. The Project would not be considered a point-source of significant emissions. The Project would generate construction emissions in the vicinity of sensitive receptors.

Diesel particulate matter (DPM) is the primary toxic air contaminant (TAC) of concern and is generated from fuel consumption in heavy construction equipment. Abidance to the County of San Diego Grading Ordinance, SDAPCD Rule 55, and to a confined construction schedule, would reduce emissions. Therefore, exposure to construction emissions would be temporary and would not expose sensitive receptors to excessive concentrations of air pollutants.

The Project would introduce additional residential homes which are considered new sensitive receptors; however, the project site is not located within a quarter-mile of any identified point source of significant emissions and is surrounded by residential homes. Similarly, the Project does not propose uses or activities that would result in exposure of these sensitive receptors to significant pollutant concentrations and would not place sensitive receptors near any Carbon Monoxide hotspots.

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

- 3(e) The GPU EIR concluded this impact to be less than significant. The Project could produce objectionable odors during construction of the residences, however, these substances, if present at all, would only be in trace amounts (less than 1 µg/m³). Therefore, the Project would not create objectionable odors affecting a substantial number of people.

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

Conclusion

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

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

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
4. Biological Resources – Would the Project:			
a) Have a substantial adverse effect, either directly or through habitat modifications, on any candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Conflict with the provisions of any adopted Habitat Conservation Plan, Natural Communities Conservation Plan, other approved local, regional or state habitat conservation plan or any other local policies or ordinances that protect biological resources?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion

The following technical studies were prepared for the Project:
Biological Resource Letter Report Over APNs 392-070-10 and 392-070-07 on Lakeside Avenue, prepared by Cummings Environmental Inc., dated January 2022

- 4(a) The GPU EIR concluded this impact to be significant and unavoidable. Biological resources on the project site were evaluated in a Biological Resource Letter Report prepared by Cummings Environmental, dated January 2022. The site contains Diegan coastal sage scrub, urban/developed, and disturbed habitats. Sensitive wildlife species identified onsite include orange-throated whiptail (*Aspidoscelis hyperythra*), cooper's hawk (*Accipiter cooperi*), rufous-crowned sparrow (*Aimophila ruficeps* ssp. *canescens*), turkey vulture (*Cathartes aura*), Nuttall's woodpecker (*Picoides nuttallii*), and coastal California Gnatcatcher (*Polioptila californica californica*). One sensitive plant species, San Diego County Viguiera (*Viguiera laciniata*), was identified onsite. As a result of this Project, impacts will occur to 5.125 acres of Diegan coastal sage scrub. The site is located within the Metro-Lakeside-Jamul Segment of the County's Multiple Species Conservation Program (MSCP), with two small portions within the Pre-Approved Mitigation Area (PAMA).

As considered by the GPU EIR, Project impacts to sensitive habitat and/or species will be mitigated through ordinance compliance and through implementation of the following mitigation measures: dedicating 7.689 acres of Diegan coastal sage scrub within an onsite open space easement that excludes the proposed utility easements, implementation of a limited building zone easement and open space signage, and breeding season avoidance to prevent brushing, clearing, and/or grading between February 15th and August 31st. The GPU EIR identified these mitigation measures as Bio 1.6 and Bio 1.7.

As previously discussed, the GPU EIR determined impacts to special status species as significant and unavoidable. However, the Project determined impacts to be less than significant with the incorporation of Project mitigation measures identified by, or consistent with, the GPU EIR mitigation measures Bio 1.6 and Bio 1.7. Therefore, the Project would be consistent with the analysis within the GPU EIR because it would not create new impacts, increase impacts, and there is no new information of substantial importance than identified within the GPU EIR.

- 4(b) The GPU EIR concluded this impact to be significant and unavoidable. Based on the Biological Resource Letter Report, the following sensitive habitats were identified on the site: Diegan coastal sage scrub. As detailed in response 4(a) above, direct, and indirect impacts to sensitive natural communities identified in the Resource Protection Ordinance (RPO), National Community Conservation Planning (NCCP), Fish and Wildlife Code, and Endangered Species Act are mitigated.

As considered by the GPU EIR, Project impacts to sensitive habitats will be mitigated through ordinance compliance and through implementation of the following mitigation measures: dedicating 7.689 acres of Diegan coastal sage scrub within an onsite open space easement, implementation of a limited building zone easement and open space signage, and breeding season avoidance to prevent brushing, clearing, and/or grading between February 15th and August 31st. The GPU EIR identified these mitigation measures as Bio 1.6 and Bio 1.7.

As previously discussed, the GPU EIR determined impacts to riparian habitat and other sensitive natural communities as significant and unavoidable. However, the proposed Project's impacts would be less than significant with the implementation of Project mitigation measures consistent with GPU EIR mitigation measures Bio-1.6 and Bio-1.7. Therefore, the Project would be consistent with the analysis within the GPU EIR because it would not 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. Based on the Biological Resource Letter Report, the proposed project site contains an ephemeral drainage that flows parallel to the lower portion of the access road down to a brow ditch associated with the off-site self-storage facility. Under the current definitions, this drainage is considered waters of the state, and waters of the U.S., but not as a RPO wetland. To eliminate the need for permits through the California Department of Fish and Wildlife (CDFW), the Regional Water Quality Control Board (RWQCB), and the U.S. Army Corps of Engineers (ACOE), the drainage has been avoided through Project design.

As previously discussed, the GPU EIR determined impacts to federally protected wetlands as significant with mitigation. However, the Project impacts would be less than significant with mitigation measures identified by the GPU EIR mitigation measures as Bio 1.6 and Bio 1.7. 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(d) The GPU EIR concluded this impact to be significant and unavoidable. Based on County's Geographic Information System (GIS) analysis, the County's Comprehensive Matrix of Sensitive Species, and a Biological Resource Letter Report, it was determined that the site is not part of a regional linkage/corridor as identified on MSCP maps nor is it in an area considered regionally important for wildlife dispersal.

As previously discussed, the GPU EIR determined impacts to wildlife movement corridors as significant and unavoidable. However, the Project impacts were determined to be less than significant for the reasons detailed above. Therefore, the Project would be consistent with the analysis within the GPU EIR because it would not create new impacts, increase impacts, and there is no new information of substantial importance than identified within the GPU EIR.

- 4(e) The GPU EIR concluded this impact to be less than significant. The Project is consistent with the MSCP, Biological Mitigation Ordinance (BMO), and RPO because mitigation will be required to compensate for the loss of significant habitat. The Project will not conflict with the provisions of any adopted Habitat Conservation Plan, Natural Communities Conservation Plan, other approved local, regional, or state habitat conservation plan or any other local policies or ordinances that protect biological resources.

As previously discussed, the GPU EIR determined impacts on local policies and ordinances as well as habitat conservation plans and natural community conservation plans as less than significant. As the proposed Project would have a less-than-significant impact for the reasons detailed above, the Project would be consistent with the analysis 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 because:

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

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

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

Discussion

The following technical studies were prepared for the Project:
 Negative Cultural Resources Survey Report, prepared by ASM Affiliates, Inc., dated November 2020

5(a) The GPU EIR concluded this impact to be less than significant with mitigation. Based on an analysis of records and a survey of the property by County approved archaeologist, Brian Williams, it has been determined that the Project would not result in impacts to historical resources because they do not occur within the Project site. The results of the survey are provided in the cultural resources report titled, *Negative Cultural Resources Survey Report*, prepared by ASM Affiliates, Inc., dated November 2020.

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. Based on an analysis of records and a survey of the property by County approved archaeologist, Brian Williams (November 2020), it has been determined that the Project would not result in impacts to archaeological resources because they do not occur within the Project site. In addition, the Native American Heritage Commission (NAHC) was contacted for a Sacred Lands File check. The NAHC response indicated that no sacred sites, on record with the commission, were present on the Project property. Boe Wiley served as the Native American monitor during the survey.

Although no resources were identified during site surveys, the potential exists for subsurface deposits because of dense vegetative cover on portions of the property which limited ground visibility. Additionally, the Lakeside area is sensitive for resources and recorded archaeological sites are located within the vicinity of the Project.

As considered by the GPU EIR, potential impacts to cultural resources would be mitigated through ordinance compliance and through implementation of the following mitigation measures consistent with the GPU EIR Mitigation Measure Cul-2.5:

- Grading monitoring under the supervision of a County-approved archaeologist and a Kumeyaay Native American monitor
- Conformance with the County's Cultural Resource Guidelines if resources are encountered. In addition, the Project would be conditioned with archaeological monitoring (Cul-2.5) that includes the following requirements:

Pre-Construction

Contract with a County approved archaeologist to perform archaeological monitoring and a potential data recovery program during all earth-disturbing activities. The Project Archaeologist shall perform the monitoring duties before, during and after construction.

Pre-construction meeting to be attended by the Project Archaeologist and Kumeyaay Native American monitor to explain the monitoring requirements.

Construction

Monitoring. Both the Project Archaeologist and Kumeyaay Native American monitor are to be onsite during earth disturbing activities. The frequency and location of monitoring of native soils would be determined by the Project Archaeologist in consultation with the Kumeyaay Native American monitor. Both the Project Archaeologist and Kumeyaay Native American monitor would evaluate fill soils to ensure that they are negative for cultural resources.

If cultural resources are identified:

Both the Project Archaeologist and Kumeyaay Native American monitor have the authority to divert or temporarily halt ground disturbance operations in the area of the discovery.

The Project Archaeologist shall contact the County Archaeologist at the time of discovery.

The Project Archaeologist in consultation with the County Archaeologist and Kumeyaay Native American shall determine the significance of discovered resources.

Construction activities would be allowed to resume after the County Archaeologist has concurred with the significance evaluation.

Isolates and non-significant deposits shall be minimally documented in the field. Should the isolates and non-significant deposits not be collected by the Project Archaeologist, the Kumeyaay Native American monitor may collect the cultural material for transfer to a Tribal curation facility or repatriation program.

If cultural resources are determined to be significant, a Research Design and Data Recovery Program shall be prepared by the Project Archaeologist in consultation with the Kumeyaay Native American monitor and approved by the County Archaeologist. The program shall include reasonable efforts to preserve (avoid) unique cultural resources of Sacred Sites; the capping of identified Sacred Sites or unique cultural resources and placement of development over the cap if avoidance is infeasible; and data recovery for non-unique cultural resources. The preferred option is preservation (avoidance).

Human Remains.

If Human remains are discovered, the Property Owner or their representative shall contact the County Coroner and the County Archaeologist.

Upon identification of human remains, no further disturbance shall occur in the area of the find until the County Coroner has made the necessary findings as to origin. If the human remains are to be taken offsite for evaluation, they shall be accompanied by the Kumeyaay Native American monitor.

If the remains are determined to be of Native American origin, the Most Likely Descendant (MLD), as identified by the Native American Heritage Commission (NAHC), shall be contacted by the Property Owner or their representative in order to determine proper treatment and disposition of the remains.

The immediate vicinity where the Native American human remains are located is not to be damaged or disturbed by further development activity until consultation with the MLD regarding their recommendations as required by Public Resources Code Section 5097.98 has been conducted.

Public Resources Code §5097.98, CEQA §15064.5 and Health & Safety Code §7050.5 shall be followed in the event that human remains are discovered.

Rough Grading

Monitoring Report. Upon completion of Rough Grading, a monitoring report shall be prepared by the Project Archaeologist identifying whether resources were encountered. A copy of the monitoring report shall be provided to PDS and to the South Coastal Information Center and any culturally-affiliated tribe who requests a copy.

Final Grading

Final Report. A final report shall be prepared by the Project Archaeologist substantiating that earth-disturbing activities are completed and whether cultural resources were encountered. A copy of the final report shall be submitted to PDS and to the South Coastal Information Center, and any culturally-affiliated tribe who requests a copy.

Cultural Material Conveyance

The final report shall include evidence that all prehistoric materials have been curated at a San Diego curation facility or Tribal curation facility that meets federal standards per 36 CFR Part 79, or alternatively have been repatriated to a culturally affiliated tribe.

The final report shall include evidence that all historic materials have been curated at a San Diego curation facility that meets federal standards per 36 CFR Part 79.

As previously discussed, the GPU EIR determined impacts to archaeological resources as less than significant with mitigation. The Project would incorporate the GPU EIR mitigation measure Cul-2.5 which requires monitoring. 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(c) The GPU EIR concluded this impact to be less than significant. 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 site support any known geologic characteristics that have the potential to support unique geologic features.

As previously discussed, the GPU EIR determined impacts on unique geologic features as less than significant. As the Project would have a less-than-significant impacts for the reasons detailed above, the Project would be consistent with the analysis 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(d) The GPU EIR concluded this impact to be less than significant with mitigation. A review of the County's Paleontological Resources Maps and data on San Diego County's geologic formations indicates that the Project is located on geological formations that potentially contain unique paleontological resources.

Accordingly, grading monitoring by the Project contractor would be a condition of Project approval. If paleontological resources are identified, then a qualified Paleontologist would be engaged.

As considered by the GPU EIR, potential impacts to paleontological resources would be mitigated through ordinance compliance and through implementation of the following mitigation measures consistent with GPU EIR Mitigation Measures Cul 3.1:

- Grading monitoring
- Conformance with the County's Paleontological Resource Guidelines if resources are encountered.

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(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. Also see section 5(b) above for mitigation measures for inadvertent discoveries.

As previously discussed, the GPU EIR determined impacts to human remains as less than significant with mitigation. The proposed Project determined impacts to human remains as less than significant. Therefore, the Project would be consistent with the analysis within the GPU EIR because it would not create new impacts, increase impacts, and there is no new information of substantial importance than identified within the GPU EIR.

Conclusion

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

1. No peculiar impacts to the Project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. Feasible mitigation measures contained within the GPU EIR (Cul-2.5 and Cul-3.1), would be applied to the Project.

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

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

Discussion

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

- 6(a) The Project would increase the demand for electricity and natural gas at the project site, and gasoline consumption in the project area during construction and operation relative to

existing conditions. CEQA requires mitigation measures to reduce “wasteful, inefficient and unnecessary” energy usages (Public Resources Code Section 21100, subdivision [b][3]). Neither the law nor the State CEQA Guidelines establish criteria that define wasteful, inefficient, or unnecessary use. Compliance with the California Code of Regulations 2019 Title 24 Part 6 Building Code would result in highly energy-efficient buildings. However, compliance with building codes does not adequately address all potential energy impacts during construction and operation. It can be expected that energy consumption, outside of the building code regulations, would occur through the transport of construction materials to and from the site during the construction phase, the use of personal vehicles by residents, and the operation of delivery vehicles to service the new residential units.

Grading and Construction

The grading required for the Project would be 11,334 cubic yards of even cut and fill. During the grading and construction phases of the Project, the primary energy source utilized would be petroleum from construction equipment and vehicle trips. To a lesser extent, electricity would also be consumed for the temporary electric power for as-necessary lighting and electronic equipment. Activities including electricity would be temporary and negligible; therefore, electricity use during grading and construction would not result in wasteful, inefficient, or unnecessary consumption of energy. In addition, natural gas is not anticipated to be required during construction of the Project. Any minor amounts of natural gas that may be consumed as a result of the Project construction would be temporary and negligible and would not have an adverse effect; therefore, natural gas used during grading and construction would also not result in wasteful, inefficient, or unnecessary consumption of energy.

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

Operational

Operation of the Project would be typical of residential land uses requiring natural gas for space and water heating and landscape maintenance activities. The Project would meet the California Code of Regulations Title 24 Standards for energy efficiency that are in effect at the time of construction. Furthermore, the Project would result in less than 110 Average Daily Trips (ADTs) and would not be expected to result in wasteful, inefficient, or unnecessary petroleum usage throughout Project operations. The Project is consistent with the General Plan density allowance and Zoning designation and would result in roughly equivalent or less operational petroleum usage than what has been anticipated within the General Plan. The Project would also comply with the County’s Landscape Ordinance and the water use application using prescriptive compliance option to reduce overall water use onsite. Therefore, the Project would not be expected to result in wasteful, inefficient or unnecessary petroleum usage throughout Project operations.

Over the lifetime of the proposed Project, fuel efficiency of vehicles is expected to increase as older vehicles are replaced with newer, more efficient models. As such, the amount of petroleum consumed as a result of vehicle trips to and from the project site during operation would decrease over time. State and Federal regulations regarding standards

for vehicles (e.g. Advanced Clean Cars Program, CAFÉ Standards) are designed to reduce wasteful, unnecessary, and inefficient use of fuel. The coupling of various State policies and regulations such as the Zero-Emission Vehicles Mandate and Senate Bill 350 would result in the deployment of electric vehicles which would be powered by an increasingly renewable electrical grid.

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

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

- Compliance with County's Water Conservation in Landscaping Ordinance, demonstrating a 40% reduction in outdoor use which would reduce energy required for water conveyance;
- Installation of low-flow indoor water fixtures and at least one energy efficient appliance in all residential units, reducing water and energy consumption;

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

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

Conclusion

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

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

7. Geology and Soils – Would the Project:

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

Discussion

7(a)(i) The GPU EIR concluded this impact to be less than significant. The Project is not located in a fault rupture hazard zone identified by the Alquist-Priolo Earthquake Fault Zoning Act, Special Publication 42, Revised 1997, Fault-Rupture Hazards Zones in California, or located on any known active, potentially active, or inactive fault traces. The project site is approximately 9.8 miles from the nearest Alquist-Priolo Zone, and 4.3 miles from the nearest Pre-Quaternary fault zone.

7(a)(ii) The GPU EIR concluded this impact to be less than significant. To ensure the structural integrity of all buildings and structures, the Project must conform to the Seismic Requirements as outlined within the California Building Code. In addition, a soils compaction report with proposed foundation recommendation would be required to be approved before the issuance of a building permit. Therefore, compliance with the California Building Code and the County Building Code would ensure that the Project would not result in a significant impact.

7(a)(iii) The GPU EIR concluded this impact to be less than significant. A portion of the property is within a “Potential Liquefaction Area” as identified in the County Guidelines for Determining the Significance for Geologic Hazards.

Although the project site is located within a “Potential Liquefaction Area”, pursuant to County Senior Hydrogeologist, in-situ soil densities are expected to be sufficiently high to preclude liquefaction. Additionally, the Project will be required to comply with the County’s Grading Ordinance and Building Code and conduct a soils investigation prior to approval of a building permit. Therefore, compliance with the California Building Code and the

County Building Code would ensure that the Project would not result in a significant impact.

- 7(a)(iv) The GPU EIR concluded this impact to be less than significant. The Project is located in an area that is “Generally Susceptible” to landslides based on the topography of the site, as identified in the County Guidelines for Determining Significance for Geologic Hazards. Landslide Susceptibility Areas were developed based on landslide risk profiles included in the Multi-Jurisdictional Hazard Mitigation Plan, San Diego, CA (URS, 2004). Landslide risk areas from this plan were based on data including steep slopes (greater than 25%); soil series data (SANDAG based on USGS 1970s series); soil-slip susceptibility from USGS; and Landslide Hazard Zone Maps (limited to western portion of the County) developed by the California Department of Conservation Division of Mines and Geology (DMG). Also included within Landslide Susceptibility Areas are gabbroic soils on slopes steeper than 15% in grade because these soils are slide prone.

Based on review of the Project by County Senior Hydrogeologist, the on-site geological formations are not expected to be unstable or become unstable as a result of the Project due to the in-situ soil densities. Nonetheless, the Project will be required to comply with the County’s Building Code and conduct a soils investigation prior to approval of a building permit. Compliance with the Building Code and implementation of standard engineering techniques will ensure structural safety. Therefore, there will be no potentially significant impact from the exposure of people or structures to adverse effects from landslides.

As previously discussed, the GPU EIR determined less than significant impacts from exposure to seismic-related hazards and soil stability. As the proposed Project would have a less-than-significant impact with the incorporation of Project conditions for a soils compaction report, the Project would be consistent with the analysis within the GPU EIR because it would not create new impacts, increase impacts, and there is no new information of substantial importance than identified within the GPU EIR.

- 7(b) The GPU EIR concluded this impact to be less than significant. According to the Soil Survey of San Diego County, the soils on-site are identified as Cieneba-Fallbrook rocky sandy loams, 30 to 65 percent slopes (CnG2), Vista coarse sandy loam, 30 to 65 percent slopes (VsG), Fallbrook-Vista sandy loams, 15 to 30 percent slopes (FvE), and Tujunga sand, 0 to 5 percent slopes (TuB) that have a soil erodibility rating of Severe. However, the Project would not result in substantial soil erosion or the loss of topsoil because the Project would be required to comply with the Watershed Protection Ordinance (WPO) and Grading Ordinance which would ensure that the Project would not result in any unprotected erodible soils, would not substantially alter existing drainage patterns, and would not develop steep slopes. Additionally, the Project would be required to implement Best Management Practices (BMPs) per the Standard Development Project Storm Water Quality Management Plan to prevent fugitive sediment. Please see Section (10) Hydrology and Water Quality for a detailed discussion.

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

- 7(c) The GPU EIR concluded this impact to be less than significant. As indicated in response (a)(iv), the site is located in an area that is “Generally Susceptible” to landslides based on the topography of the site, as identified in the County Guidelines for Determining Significance for Geologic Hazards; however, the on-site geological formations are not expected to be unstable or become unstable as a result of the Project.

Lateral spreading is a principal effect from liquefaction. As indicated in response a(iii), although the project site is located within a “Potential Liquefaction Area” in-situ soil densities are expected to be sufficiently high to preclude liquefaction. Therefore, there will be no potentially significant impact related to lateral spreading or liquefaction.

In order to assure that any proposed buildings are adequately supported, a Soils Engineering Report is required as part of the Building Permit process. This Report would evaluate the strength of underlying soils and make recommendations on the design of building foundation systems. The Soils Engineering Report must demonstrate that a proposed building meets the structural stability standards required by the California Building Code. The Report must be approved by the County prior to the issuance of a Building Permit. With this standard requirement, in addition to compliance with the County’s Grading Ordinance and Building Code and implementation of standard engineering techniques, 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 within the GPU EIR because it would not create new impacts, increase impacts, and there is no new information of substantial importance than identified within the GPU EIR.

- 7(d) The GPU EIR determined impacts from expansive soils to be less than significant. The Project is not underlain by expansive soils. In addition, the Project would not result in a significant impact because compliance with the Building Code, preparation of a Soils Engineering Report, and implementation of standard engineering techniques would ensure structural safety.

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

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

As 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 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

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

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

8. Greenhouse Gas Emissions – Would the Project:

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

Discussion

Project Design Features

The proposed Project has incorporated design features to reduce the impacts associated to GHG. The below design features have been incorporated into this analysis:

- Compliance with County's Water Conservation in Landscaping Ordinance, demonstrating a 40% reduction in outdoor use which would reduce energy required for water conveyance;
- Compliance with the California Code of Regulations 2019 Title 24 Part 6 Building Code, resulting in highly energy-efficient buildings

Analysis

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

State CEQA Guidelines Section 15064.4 states that “the determination of the significance of greenhouse gas emissions (GHG) calls for careful judgment by the lead agency, consistent with the provisions in Section 15064. A lead agency should make a good-faith effort, based to the extent possible on scientific and factual data, to describe, calculate, or estimate the amount of greenhouse gas emissions resulting from a project.” Section 15064.4(b) further states that a lead agency should consider the following non-exclusive factors when assessing the significance of GHG emissions:

1. The extent to which the project may increase or reduce GHG emissions as compared to the existing environmental setting;

2. Whether the project emissions exceed a threshold of significance that the lead agency applies to the project; and
3. The extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions.

State CEQA Guidelines Section 15064(h)(1) states that “the lead agency shall consider whether the cumulative impact is significant and whether the effects of the project are cumulatively considerable.” A cumulative impact may be significant when the project’s incremental effect, though individually limited, is cumulatively considerable.

The County of San Diego (County) General Plan incorporates smart growth and land planning principles intended to reduce vehicle miles traveled, and thereby reduce GHG emissions. Specifically, the General Plan 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 Assembly Bill 32 (AB 32) and Senate Bill 375 (SB 375) mandates.

As such, on February 14, 2018, the County Board of Supervisors (Board) adopted a CAP, which identifies specific strategies and measures to reduce GHG emissions in the largely rural, unincorporated areas of San Diego County as well as County government operations (County of San Diego 2018). The CAP aimed to meet the state’s 2020 and 2030 GHG reduction targets (AB 32 and SB 32, respectively), and demonstrated progress towards the 2050 GHG reduction goal.

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 Environmental Impact Report (2018 CAP SEIR) was found to be out of compliance with CEQA. In response to this Board action, the County is preparing a CAP Update to revise the 2018 CAP and correct the items identified by the 4th District Court of Appeal in San Diego within the Final 2018 CAP SEIR that were not compliant.

Pending adoption of a new CAP, appropriate GHG emissions thresholds were considered for purposes of this analysis. Guidance from the California Air Pollution Control Officers Association (CAPCOA), which was developed in response to AB 32, states that projects should be screened to determine if their associated GHG emissions exceed 900 metric tons of CO₂ equivalent (MT CO₂e) (CAPCOA 2008). As this screening guidance was developed in response to AB 32 which considered GHG reduction targets through 2020, it is no longer used as a screening tool for County projects.

In April 2020, the Sacramento Metropolitan Air Quality Management District (SMAQMD) published project screening levels and determined that projects estimated to generate less than 1,100 MT CO₂e per year would not result in a significant, cumulative impact (SMAQMD 2021). This threshold was developed to demonstrate compliance with the statewide reduction targets in 2030 (SB 32) and the threshold was determined by SMAQMD to capture 98 percent of total GHG emissions.

While the County does not have locally adopted screening criteria or GHG thresholds, existing published guidance is used to inform the analysis. While the CAPCOA screening

level threshold of 900 MT CO₂e was adopted with the AB 32 2020 reduction goals in mind, it is more conservative than the SMAQMD screening level which was adopted to meet 2030 statewide reduction targets. Both metrics provide information indicating the level of GHG emissions that would typically be considered low enough to not conflict with GHG reduction targets.

The Project is a Tentative Parcel Map to subdivide 15.513 acres into four lots and a remainder lot, which is consistent with the development density established by the General Plan and the certified GPU EIR. The proposed subdivision lot design would comply with all applicable zoning requirements, including minimum lot size. The Project would produce GHG emissions through construction activities, vehicle trips, use of the residential buildings, and other associated uses. Indirect GHG uses would also be produced from offsite sources such as water conveyance and utilities. However, for a project of this size, it is presumed that the construction and operational GHG emissions would fall far below 900 MT CO₂e per year, which is estimated at 50 single-family units. In addition, the project is expected to produce 40 ADT.

The proposed Project has incorporated the following design features to reduce the impacts associated to GHG and will be conditioned to meet the standards in effect at the time of construction:

Project Design Features:

- Compliance with County's Water Conservation in Landscaping Ordinance, demonstrating a 40% reduction in outdoor use which would reduce energy required for water conveyance;
- Compliance with the California Code of Regulations 2019 Title 24 Part 6 Building Code, resulting in highly energy-efficient buildings.

Project design features are consistent with County General Plan mitigation measures CC-1.1, CC-1.5, CC-1.10 and CC-1.11, which encourage incentives for energy efficient development, coordination with the San Diego County Water Authority and other water agencies, and implementation of the Ordinance Relating to Water Conservation for Landscaping. As such, the project would not contribute to a cumulatively considerable contribution to global climate change.

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 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.

- 8(b) The GPU EIR concluded this impact to be less than significant. Executive Order (EO) S-3-05 and EO 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 Climate Change Scoping Plan outlines reduction measures needed to achieve the 2030 target. As described above, the Project would not result in a cumulatively considerable contribution to global climate change. The Project is also consistent with the density established through the County General Plan and Zoning Ordinance. As such, the Project would be consistent with County goals and policies included in the County General Plan that address greenhouse gas reductions, and the Project would be

consistent with emissions reduction targets of Assembly Bill 32 and the Global Warming Solutions Act.

The Project would be required to comply with the Building Energy Efficiency Standards for low-rise residential buildings as outlined by the California Energy Commission. These requirements outline standards for energy efficiency related to lighting, water heating, HVAC, and photovoltaic systems. The Project would be consistent with General Plan policy COS-15.1 which requires that new buildings be designed and constructed in accordance with “green building” programs that incorporate techniques and materials that maximize energy efficiency and reduce emissions of GHGs and toxic air contaminants. Further discussion regarding energy efficiency is discussed above in section 3. Air Quality and 6. Energy Use.

Furthermore, project emissions would decline beyond the buildout year of the project due to continued implementation of federal, state, and local reduction measures, such as increased federal and state vehicle efficiency standards, and SDG&E’s increased renewable sources of energy in accordance with RPS goals. Based on currently available models and regulatory forecasting, project emissions would continue to decline through at least 2050. Given the reasonably anticipated decline in project emissions that would occur post-construction, the project is in line with the GHG reductions needed to achieve the 2050 GHG emission reduction targets identified by EO S-3-05.

The 2017 Scoping Plan identifies state strategies for achieving the state’s 2030 GHG emissions reduction target codified by SB 32. Measures under the 2017 Scoping Plan scenario build on existing programs such as the Low Carbon Fuel Standard, Advanced Clean Cars Program, RPS, SCS, Short-Lived Climate Pollutant Reduction Strategy, and the Cap-and-Trade Program. The project would comply with all applicable provisions contained in the 2017 Scoping Plan since the adopted regulations would apply to new development or the emission sectors associated with new development.

The project was also evaluated for consistency with the San Diego Forward, which is the Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS) that demonstrate how the region would meet its transportation related GHG reduction goals. The growth projections used in 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. The project is consistent with the density established under the County General Plan and is consistent with the General Plan policies. 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.

Thus, the Project would not conflict with any applicable plan, policy or regulation adopted for the purpose of reducing emissions of greenhouse gas emissions.

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

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

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

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

- | | | | |
|---|--------------------------|--------------------------|--------------------------|
| a) Create a significant hazard to the public or the environment through the routine transport, storage, use, or disposal of hazardous materials or wastes or through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| c) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, or is otherwise known to have been subject to a release of hazardous substances and, as a result, would it create a significant hazard to the public or the environment? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| d) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| e) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

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. The Project would not create a significant hazard to the public or the environment because it does not propose the storage, use, transport, emission, or disposal of Hazardous Substances, nor are Hazardous Substances proposed or currently in use in the immediate vicinity. In addition, the Project does not propose to demolish any existing structures onsite and therefore would not create a hazard related to the release of asbestos, lead-based paint or other hazardous materials from demolition activities.

As previously discussed, the GPU EIR determined impacts from transport, use and disposal of hazardous materials and accidental release of hazardous materials to be less than significant. As the proposed Project would have a less than significant impact for the reasons detailed above, the Project would be consistent with the analysis 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.

9(b) The GPU EIR concluded this impact to be less than significant. The Project is not located within one-quarter mile of an existing or proposed school. The closest school, El Capitan High School, is 0.4 miles east of the Project site. The Project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of the schools. Furthermore, the Project is required to comply with applicable regulations pertaining to hazardous waste to ensure that impacts related to hazardous emissions and schools is less than significant.

As previously discussed, the GPU EIR determined impacts from hazards to schools to be less than significant. As the proposed Project would have a less-than-significant impact for the reasons detailed above, the Project would be consistent with the analysis 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.

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

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

- 9(d) The GPU EIR concluded this impact to be less than significant with mitigation. The Project is not located within an Airport Land Use Compatibility Plan (ALUCP) for airports. The project is not located within 2 miles of an airport. The closest airport is Gillespie Field, which is approximately 4 miles southeast of the project site.

Furthermore, the Project does not propose 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.

As previously discussed, the GPU EIR determined impacts on public airports to be less than significant. As the proposed Project would have a less-than-significant impact for the reasons detailed above, the Project would be consistent with the analysis 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.

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

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

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

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

- 9(f)(iii) OIL SPILL CONTINGENCY ELEMENT:
The Project is not located along the coastal zone.

- 9(f)(iv) EMERGENCY WATER CONTINGENCIES ANNEX AND ENERGY SHORTAGE RESPONSE PLAN:
The Project would not alter major water or energy supply infrastructure which could interfere with the plan.

- 9(f)(v) DAM EVACUATION PLAN:
The southeastern portions of the project site is located within the dam inundation zone for the San Vicente Dam; however, the development would not constitute a "Unique Institution" such as a hospital, school, or retirement home pursuant to the Office of Emergency Services included within the County Guidelines for Determining Significance,

Emergency Response Plans. Therefore, the Project would not impair implementation of or physically interfere with an adopted dam evacuation plan.

As previously discussed, the GPU EIR determined impacts from emergency response and evacuation plans to be less than significant with mitigation. As the Project would have a less-than-significant impact for the reasons detailed above, the Project would be consistent with the analysis 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.

- 9(g) The GPU EIR concluded this impact as significant and unavoidable. The Project is within the Moderate Fire Hazard Severity Zone (FHSZ) and within the Urban-Wildlife Interface Zone. The Project would not expose people or structures to a significant risk of loss, injury or death involving wildland fires because the Project would comply with the regulations relating to emergency access, water supply, and defensible space specified in the Consolidated Fire Code for the 16 Fire Protection Districts in San Diego County. Specifically, all exterior walls would be 1-hour rated firewalls. On the south side of both buildings, no openings such as doors or windows would be constructed. Both buildings would be fully sprinklered. Well-developed fuel treatments would be required throughout the entire site. A 20-foot wide, paved with a small portion of decomposed granite (DG), fire access road would be constructed off of Lakeside Avenue. The access road would have a fire apparatus turn around built to reduce fire apparatus backing incidents. In addition, the Project would install a new fire hydrant along the proposed access road.

Implementation of these fire safety standards would occur during the building permit process and is consistent with GPU mitigation measure Haz-4.3. In addition, the Project is consistent with the Zoning Ordinance and the density established under the County of San Diego General Plan. Therefore, for the reasons stated above, the Project would not expose people or structures to a significant risk of loss, injury or death involving wildland fires. Moreover, the Project would not contribute to a cumulatively considerable impact, because all past, present and future projects in the surrounding area are required to comply with the Consolidated Fire Code.

As previously discussed, the GPU EIR determined impacts from wildland fires to be significant and unavoidable. As the Project would have a less-than-significant impact with consistency to mitigation measure Haz-4.3, 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.

- 9(h) The GPU EIR concluded this impact as less than significant. The Project does not involve or support uses that would allow water to stand for a period of 72 hours or more (e.g. artificial lakes, agricultural ponds). Also, the Project does not involve or support uses that will produce or collect animal waste, such as equestrian facilities, agricultural operations (chicken coops, dairies, etc.), solid waste facilities, or other similar uses. One parcel south of the Project site has equestrian facilities on site; however, the equestrian facility would be subject to County Department of Environmental Health (DEH) regulations for manure management and vector control. Therefore, the Project will not substantially increase current or future resident's exposure to vectors, including mosquitoes, rats or flies.

As previously discussed, the GPU EIR determined less than significant impacts with mitigation from vectors. The proposed Project would have a less-than-significant impact. Therefore, the Project would be consistent with the analysis within the GPU EIR because it would not create new impacts, increase impacts, and there is no new information of substantial importance than identified within the GPU EIR.

Conclusion

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

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

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

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

Discussion

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

Preliminary Drainage Study for Hurrell Subdivision prepared by Omega Engineering & Consultants, dated May 2, 2022.

Stormwater Quality Management Plan (SWQMP) For Priority Development Projects (PDPs) prepared by Omega Engineering & Consultants, dated October 4, 2021.

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 offsite tracking of sediment; and measures to control materials management and waste management. The SWPPP would be prepared in accordance with Order No. 2009-009-DWQ, National Pollutant Discharge Elimination System (NPDES) Order CAS000002 Construction General Permit (CGP) adopted by the State Water Resources Control Board (SWRCB) on September 2, 2009.

During the post-construction phase, as outlined in the PDP SWQMP, the Project would implement site design, source control and structural BMPs to prevent potential pollutants from entering storm water runoff. Since the preparation of the PDP SWQMP, the Project access has been updated to include a small portion near the Project access as DG, while the remainder will remain paved. Therefore, the PDP SWQMP prepared is a more conservative project estimate. The PDP SWQMP has been prepared in accordance with the County of San Diego BMP Design Manual (2019) and SDRWQCB Order No. R9-2013-0001 Municipal Separate Storm Sewer System (MS4) permit (2013), as adopted by the RWQCB on May 8, 2013.

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

As previously discussed, the GPU EIR determined significant and unavoidable impacts to water quality standards and requirements. As the Project would have a less-than-significant impact to 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 site is located within Santee Hydrologic Sub-Area (HSA 907.12), which is part of the San Diego River Hydrologic Area (HA 907.1). Under Section 303(d) of the Clean Water Act, the Lower San Diego River Watershed was identified as impaired for a number of pollutants, including, but not limited to: cadmium, nitrogen, dissolved oxygen, phosphorus, Total Dissolved Solids, and enterococcus bacteria. The Project could contribute to release of these pollutants; however, the Project would comply with the WPO and implement site design measures, source control BMPs, and structural BMPs to prevent a significant increase of pollutants to receiving waters.

As previously discussed, the GPU EIR determined significant and unavoidable impacts to water quality standards and requirements. However, Project would have a less-than-significant impact with mitigation (Hyd-1.2 through Hyd-1.5) to water quality standards and requirements. Therefore, the Project would be consistent with the analysis 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(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 proposed Project would have a less-than significant impact with mitigation to water quality standards and requirements and groundwater supplies and recharge (Hyd-1.2 through Hyd-1.5). Therefore, the Project would be consistent with the analysis 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. The Project is within the service area of the Lakeside Municipal Water District that obtains water from the San Diego County Water Authority who imports water through the Metropolitan Water District of Southern California (MWD). MWD obtains its water from two sources, the Colorado River and the State Water Project. The Project would not use groundwater for its potable water supply. In addition, the Project does not involve operations that would interfere substantially with groundwater recharge.

As previously discussed, the GPU EIR determined significant and unavoidable impacts to groundwater supplies and recharge. As the Project would have a less-than-significant impact to 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 not result in substantial erosion or siltation on or off-site because storm water quality management plans are prepared for both the construction and post-construction phases of the development Project. During the construction phase, the Project would be required to prepare a 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 offsite tracking of sediment; and measures to control materials management and waste management.

The SWPPP would be prepared in accordance with Order No. 2009-009-DWQ, NPDES Order CAS000002 CGP adopted by the SWRCB on September 2, 2009. During the post-construction phase, as outlined in the PDP SWQMP dated October 4, 2021, the Project would implement site design, source control and structural BMPs to prevent potential pollutants from entering storm water runoff. The SWQMP has been prepared in accordance with the County of San Diego BMP Design Manual (2019) and SDRWQCB Order No. R9-2013- 0001 Municipal Separate Storm Sewer System (MS4) permit (2013), as adopted by the RWQCB on May 8, 2013.

The SWPPP and SWQMP specify and describe the implementation process of all BMPs that would address equipment operation and materials management, prevent the erosion process from occurring, and prevent sedimentation in any onsite and downstream receiving waters. The Department of Public Works would ensure that these plans are implemented as proposed.

The existing site is located on a hill approximately 300 ft high. Under existing conditions, the site drains via surface flow. Areas north of the crest of the hill drain to the north to the neighboring property. Areas south of the crest drain south to natural drainage path located on the south facing hillside. The offsite portion of the private access road and the areas tributary to it drain to the frontage of Lakeside Avenue.

The redevelopment of the project site will modify the onsite drainage patterns, but the discharge point locations will remain unchanged. The proposed improvements result in a decrease in peak flowrates for the 6-hr, 100-yr storm for two of the discharge points, while one additional discharge point will see no change in flow. The Project is not anticipated to alter runoff in a manner that would result in substantial erosion or siltation onsite or offsite.

As previously discussed, the GPU EIR determined significant and unavoidable impacts to erosion or siltation. However, the Project would have a less-than-significant impact to erosion or siltation with the implementation of Project conditions, consistent with GPU mitigation measures (Hyd-1.2 through Hyd-1.5). Therefore, the Project would be consistent with the analysis 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(f) The GPU EIR concluded this impact to be less than significant with mitigation. The Preliminary Hydrology Study prepared by Omega Engineering and Consultants dated October 4, 2021 determined that the Project would not alter the existing drainage pattern in a manner which would result in flooding on- or off-site.

The existing site is located on a hill approximately 300 ft high. Under existing conditions, the site drains via surface flow. Areas north of the crest of the hill drain to the north to the neighboring property. Areas south of the crest drain south to natural drainage path located on the south facing hillside. The offsite portion of the private access road and the areas tributary to it drain to the frontage of Lakeside Avenue.

The redevelopment of the project site will modify the onsite drainage patterns, but the discharge point locations will remain unchanged. The proposed improvements result in a decrease in peak flowrates for the 6-hr, 100-yr storm at two discharge locations, while one additional discharge location will see no change in flow. The Project will not 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.

Through the use of Low Impact Development (LID) practices and conjunctive use facility, flows leaving the site would be detained to be equal or less than pre-Project condition reducing additional runoff.

As previously discussed, the GPU EIR determined impacts to flooding as less than significant with mitigation. The Project would have a less-than-significant impact with regards to flooding with design features and improvements consistent with GPU mitigation measures (Hyd-1.2 through Hyd-1.5). Therefore, the Project would be consistent with the analysis 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(g) The GPU EIR concluded this impact to be less than significant with mitigation. Pursuant to the Drainage Study prepared by Omega Engineering & Consultants, Inc and dated October 4, 2021, the proposed Project would detain stormwater onsite and would not increase peak flows; therefore, the Project would not contribute runoff water that would exceed the capacity of existing or planned storm water drainage systems.

As previously discussed, the GPU EIR determined impacts to exceed capacity of stormwater systems as less than significant with mitigation. With mitigation, the proposed Project would have a less-than-significant impact with regards to exceeding the capacity of stormwater systems with mitigation (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(h) The GPU EIR concluded this impact to be significant and unavoidable. The Project has the potential to generate pollutants; however, site design measures, source control BMPs, and treatment control BMPs as indicated in response 10(a) would be employed such that potential pollutants would be reduced to the maximum extent practicable.

As previously discussed, the GPU EIR determine impacts to water quality standards and requirements as significant and unavoidable. However, the Project would have a less-than-significant impact to water quality standards with the implementation of project conditions listed in 10(a). The conditions are consistent with the GPU EIR mitigation measures Hyd-1.2 through Hyd-1.5. Therefore, the Project would be consistent with the analysis 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(i) The GPU EIR concluded this impact to be less than significant with mitigation. No FEMA or County-mapped floodplains were identified on the Project site or off-site improvement locations. The Project would not place housing within a County or federal floodplain or flood way.

As previously discussed, the GPU EIR determined impacts from housing within a 100-year flood hazard area as less than significant with mitigation. As, the Project would have a less-than-significant impact for the reasons detailed above, the Project would be consistent with the analysis within the GPU EIR because it would not create new impacts, increase impacts, and there is no new information of substantial importance than identified within the GPU EIR.

- 10(j) The GPU EIR concluded this impact to be less than significant with mitigation. No FEMA or County-mapped floodplains were identified on the Project site or off-site improvement locations. The Project does not proposed housing and would therefore not place housing within a County or federal floodplain or flood way.

As previously discussed, the GPU EIR determined impacts from housing within a 100-year flood hazard area as less than significant with mitigation. As the Project would have a less-than-significant impact for the reasons detailed above, the Project would be consistent with the analysis within the GPU EIR because it would not create new impacts, increase impacts, and there is no new information of substantial importance than identified within the GPU EIR.

10(k) The GPU EIR concluded this impact to be less than significant with mitigation. The Project does not propose development within any identified special flood hazard area. As previously discussed, the GPU EIR determined impacts from housing within a 100-year flood hazard area and emergency response and evacuation plans as less than significant with mitigation. As the Project would have a less-than-significant impact for the reasons detailed above, the Project would be consistent with the analysis within the GPU EIR because it would not create new impacts, increase impacts, and there is no new information of substantial importance than identified within the GPU EIR.

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

The southeastern portions of the project site is located within the dam inundation zone for the San Vicente Dam; however, the development would not constitute a “Unique Institution” such as a hospital, school, or retirement home pursuant to the Office of Emergency Services included within the County Guidelines for Determining Significance, Emergency Response Plans. Therefore, the 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 and flood hazards and emergency response and evacuation plans as less than significant with mitigation. The Project would have a less-than-significant impact for the reasons detailed above. Therefore, the Project would be consistent with the analysis 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(m)(i) The GPU EIR concluded this impact to be less than significant with mitigation.

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

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

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

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

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

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

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

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

Discussion

11(a) The GPU EIR concluded this impact to be less than significant with mitigation. The Project does not propose the introduction of new infrastructure such as major roadways, water supply systems, or utilities to the area. The Project is for a minor residential subdivision and is consistent with the County Zoning Ordinance Land Use Regulation and density established under the County of San Diego General Plan.

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

11(b) The GPU EIR concluded this impact to be less than significant. The Project is a minor residential subdivision of a 15.5-acre property into four parcels and a remainder parcel. The residential use types and density are consistent with the County General Plan Semi-Rural Residential Designation and Regional Category and with the County Zoning Ordinance. 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, 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 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

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

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

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

- | | | | |
|---|--------------------------|--------------------------|--------------------------|
| a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

12(a) The GPU EIR determined that impacts to mineral resources would be significant and unavoidable. The California Surface Mining and Reclamation Act (SMARA) required classification of land into Mineral Resource Zones (MRZs). The project site has been classified by the California Department of Conservation – Division of Mines and Geology (Update of Mineral Land Classification: Aggregate Materials in the Western San Diego Production-Consumption Region, 1997) as not being within an area of “Potential Mineral Resource Significance” (MRZ-3). The project site is within 1300 feet of a known area for mineral resources, “Resources Present” (MRZ-2). However, the project site has no alluvium or mines and is surrounded by development. 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 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.

12(b) The GPU EIR concluded this impact to be significant and unavoidable. The Project site is not located in MRZ-3 zone. Furthermore, there are no active mines located in the Project area. 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 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

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

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

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
13. Noise – Would the Project:			
a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

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

Discussion

13(a) The GPU EIR concluded this impact to be less than significant with mitigation. The area surrounding the project site consists of residences and agricultural uses. The Project will not expose people to potentially significant noise levels that exceed the allowable limits of the General Plan, Noise Ordinance, or other applicable standards for the following reasons:

General Plan – Noise Element: Policy 4b addresses noise sensitive areas and requires projects to comply with a Community Noise Equivalent Level (CNEL) of 60 decibels (dBA). Projects which could produce noise in excess of 60 dB(A) are required to incorporate design measures or mitigation as necessary to comply with the Noise Element. Per review of County GIS, the project site is located 160 feet to the west of SR-67 in a noise contour that may exceed 60 dB(A). The Project is conditioned to record a County Noise Easement over the project site prior to the final map. The Noise Easement would require an acoustical analysis prior to any building permit issuance, consistent with GPU EIR mitigation measure Noi-1.1. The acoustical analysis would analyze potential noise impacts and propose design features to incorporate into the development to ensure that future residents are not exposed to noise in excess of an exterior sound level limit of 60 dB(A) CNEL, and interior sound level limit of 45 dB(A) CNEL.

Noise Ordinance – Section 36-404: Non-transportation noise generated by the Project is not expected to exceed the standards of the Noise Ordinance at or beyond the Project’s property line. The site is zoned Rural Residential (A70) that has a one-hour average sound limit of 50 dBA daytime and 45 dBA nighttime. The adjacent properties to the east and south are zoned Limited Agriculture (A70). The Project does not involve any noise producing equipment that would exceed applicable noise levels at the adjoining property line.

Noise Ordinance – Section 36-410: The Project will not generate construction noise in excess of Noise Ordinance standards. Construction operations will occur only during permitted hours of operation. Also, it is not anticipated that the Project will operate construction equipment in excess of an average sound level of 75dB between the hours of 7 AM and 7 PM. The Project will implement BMPs, which will ensure that the noise levels from these activities do not exceed the County’s Noise Standards.

As previously discussed, the GPU EIR determined impacts to excessive noise levels as less than significant with mitigation. The Project would have a less than significant impact. Therefore, the Project would be consistent with the analysis within the GPU EIR because it would not create new impacts, increase impacts, and there is no new information of substantial importance than identified within the GPU EIR.

- 13(b) The Project is a subdivision for residential uses which are sensitive to low ambient vibration. However, the residences would be setback more than 600 feet from any transit Right-of-Way and any property line for parcels zoned industrial or extractive use; or any permitted extractive uses. A setback of 600 feet ensures that the operations do not have any chance of being impacted by groundborne vibration or groundborne noise levels (Harris, Miller Miller and Hanson Inc., Transit Noise and Vibration Impact Assessment 1995).

Also, the Project does not propose any major, new or expanded infrastructure such as mass transit, highways or major roadways or intensive extractive industry that could generate excessive groundborne vibration or groundborne noise levels on-site or in the surrounding area. In addition, the Project will not propose any equipment such as pile driving or blasting that would result in vibration or ground borne noises. Therefore, the Project will not expose persons to or generate excessive groundborne vibration or groundborne noise on a Project or cumulative level.

As previously discussed, the GPU EIR determined impacts to excessive groundborne vibration as less than significant with mitigation. The Project would have a less than significant impact. Therefore, the Project would be consistent with the analysis within the GPU EIR because it would not create new impacts, increase impacts, and there is not new information of substantial importance than identified within the GPU EIR.

- 13(c) As indicated in the response listed under Section 13(a), the Project would not expose existing or planned noise sensitive areas in the vicinity of the Project site to a substantial permanent increase in noise levels that exceed the allowable limits of any applicable noise standards with the condition of a County Noise Easement, consistent with GPU EIR mitigation measure Noi-1.1. Also, the Project would not expose existing or planned noise sensitive areas to noise levels of 10 dB CNEL over existing ambient noise levels as required by the County Noise Ordinance.

As previously discussed, the GPU EIR determined impacts from 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 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.

- 13(d) The GPU EIR concluded this impact to be less than significant with mitigation. The Project does not involve any operational uses that may create substantial temporary or periodic increases in ambient noise levels in the Project vicinity. Construction noise would be subject to the County 75 dBA eight-hour average requirement between 7 am and 7 pm at the boundary of any occupied property.

As previously discussed, the GPU EIR determined impacts from temporary increase in ambient noise levels 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 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.

- 13(e) The GPU EIR concluded this impact to be less than significant with mitigation. The Project is not located within an ALUCP for airports or within 2 miles of a public airport or public use airport. The nearest airport is Gillespie Field, which is approximately 4 miles away

from the Project site. 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 not new information of substantial importance than identified within the GPU EIR.

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

Conclusion

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

1. No peculiar impacts to the Project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. Feasible mitigation measures contained within the GPU EIR would be applied to the Project (Noi-1.1). The mitigation measure, as detailed above, would require the Project applicant to conduct an acoustical analysis when a new development is proposed to ensure the project meets the County’s acceptable standards of the County Noise Element. This measure is required through a County Noise Easement.

14. Population and Housing – Would the Project:

a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
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<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?

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

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

- 14(a) The GPU EIR concluded this impact to be less than significant. The Project site is subject to the General Plan Regional Category Semi-Rural and the Land Use Designation is Semi-Rural Residential (SR-1), which allows 1 dwelling unit per acre. The Project would subdivide a 15.5-acre parcel into 4 residential lots for future development, which is less than the density evaluated by the GPU EIR for this setting. The Zoning Use Regulation for the site is Limited Agriculture (A70). The Project is consistent with density and lot size requirements of the General Plan and Zoning Ordinance. The Project is consistent with

the density allowable under the General Plan, and this would not induce substantial unplanned population growth in the area as development of the site was accounted for within the GPU. In addition, the Project does not propose any physical or regulatory change that would remove a restriction to or encourage population growth in the area.

As previously discussed, the GPU EIR determined impacts from population growth to be less than significant. As the proposed Project would have a less-than-significant impact for the reasons detailed above, the Project would be consistent with the analysis 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.

- 14(b) The GPU EIR concluded this impact to be less than significant. The Project does not propose the demolition of any residential structures and thus would not displace substantial numbers of existing housing. As such, replacement housing would not be required elsewhere.

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

- 14(c) The GPU EIR concluded this impact to be less than significant. The Project does not propose the demolition of any residential structures and thus would not displace substantial numbers of existing housing. As such, replacement housing would not be required elsewhere.

As previously discussed, the GPU EIR determined impacts from displacement of people to be less than significant. As the proposed Project would have a less-than-significant impact for the reasons detailed above, the Project would be consistent with the analysis 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 regards to the issue area of Population and Housing, the following findings can be made:

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

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

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

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

15(a) The GPU EIR concluded this impact to be less than significant with mitigation for the exception of school services, which remained significant and unavoidable. The project is a Tentative Parcel Map to subdivide 15.513 acres into four lots and a remainder lot. The Project does not involve the construction of new or physically altered governmental facilities including but not limited to fire protection facilities, sheriff facilities, schools, or parks in order to maintain acceptable service ratios, response times or other performance service ratios or objectives for any public services. Therefore, the Project would not have an adverse effect on the environment because the Project does not require new or significantly altered services or facilities to be constructed.

Water service would be provided by the Lakeside Water District, which will require a minor pipeline extension. Sewer service would be provided by the San Diego County Sanitation District. Fire and emergency protection would be provided by the Lakeside Fire Protection District. No parks or trails would be required to be constructed for this Project. The nearest fire station is the Lakeside Fire District Fire Station #2, located at 12216 Lakeside Ave, Lakeside, CA 92040 approximately 0.3 miles south. A service availability letter from the Lakeside Fire Protection District indicated that the station has sufficient capacity to serve the Project. Pursuant to the Project availability forms, students living within this community would attend schools of the Lakeside Union School District and Grossmont Union School District.

Therefore, the Project would not have an adverse physical effect on the environment because the Project does not require new or significantly altered services or facilities to be constructed. Based on the Project's service availability forms, and the discussion above, the Project would not result in the need for significantly altered services or facilities.

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

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

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

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

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

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

16(a) The GPU EIR concluded this impact to be less than significant with mitigation. The Project would increase the use of existing parks and other recreational facilities; however, the Project would be subject to Park Land Dedication Ordinance (PLDO) fees associated with the Lakeside Local Planning Area. As the proposed 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.

16(b) The GPU EIR concluded this impact to be less than significant with mitigation. The Project does not include recreational facilities or require the construction or expansion of recreational facilities. Therefore, the construction or expansion of recreational facilities cannot have an adverse physical effect on the environment. As the proposed 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 regards to the issue area of Recreation, the following findings can be made:

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

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

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

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

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

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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e) Result in inadequate emergency access?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

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

The following Technical Studies were prepared for the Project related to traffic.

Traffic Engineering Letter for Hurrell Subdivision prepared by The Perfect Solution Traffic Engineering and Transportation Planning dated February 14, 2022.

- 17(a) The GPU EIR concluded this impact to be significant and unavoidable. The County of San Diego previously adopted “Guidelines for Determining Significance and Report Format and Content Requirements for Transportation and Traffic” in 2006, with revisions and modifications approved in 2007, 2009, 2010 and 2011. Revisions and modifications focused primarily on metrics related to vehicle delay through Level of Service (LOS). These Guidelines presented an evaluation of quantitative and qualitative analyses and objective and predictable evaluation criteria and performance measures for determining whether a land development project or a public project like a community plan has a significant traffic impact on the environment pursuant to the CEQA, as well as a determination of the required level of CEQA analysis.

Senate Bill 743 (SB 743) was signed into law on September 27, 2013 and changed the way that public agencies evaluate transportation impact under CEQA. A key element of this law is the elimination of using auto delay, LOS, and other similar measures of vehicular capacity or traffic congestion as a basis for determining significant transportation impacts under CEQA. The legislative intent of SB 743 was to “more appropriately balance the needs of congestion management with statewide goals related to infill development, promotion of public health through active transportation, and reduction of greenhouse gas (GHG) emissions.” According to the law, “traffic congestion shall not be considered a significant impact on the environment” within CEQA transportation analysis.

In response, the Governor’s Office of Planning and Research (OPR) updated CEQA Guidelines to establish new criteria for determining the significance of transportation impacts. Based on input from the public, public agencies, and various organizations, OPR recommended that Vehicle Miles Traveled (VMT) be the primary metric for evaluating transportation impacts under CEQA. VMT measures the number of vehicle trips generated and the length or distance of those trips.

SB 743 does not prevent a city or county from continuing to analyze delay or LOS as part of other plans (i.e., General Plan), studies, congestion management and transportation improvements, but these metrics may no longer constitute the basis for transportation impacts under CEQA analysis as of July 1, 2020. For example, in the County, the General Plan identifies LOS as being a required analysis, and even though it would no longer be a requirement of CEQA, unless the General Plan is amended, LOS would continue to be analyzed as part of project review.

Per OPR guidance and Pub. Resources Code, § 21083, subd. (b)(2); see CEQA Guidelines, § 15064, subd. (h)(1)., “a project that falls below an efficiency-based threshold that is aligned with long-term goals and relevant plans has no cumulative impact distinct from the project impact”. Therefore, according to the traffic experts at OPR, the VMT efficiency threshold used herein is the threshold for both a direct transportation impact and cumulative transportation impact. OPR recommends at least 15 percent below the regional average to determine if there would be a VMT impact.

The requirements to prepare a detailed VMT analysis apply to all land development projects, except those that meet at least one of the screening criteria. OPR has developed certain project screening criteria to determine if a VMT analysis is required. The Small Projects screening criteria is intended for projects that will generate less than 110 ADTs that are assumed to cause a less than significant transportation impact.

The Project consists of four single-family residential lots. Based on San Diego Association of Governments (SANDAG) trip generation rates, the Project is estimated to produce 40 ADTs. Therefore, the Project would be screened out from a VMT analysis and would not result in a significant direct or cumulative VMT impact, and mitigation measures are not required. Therefore, the Project would not conflict with an applicable plan, ordinance or policy establishing measures of the effectiveness for the performance of the circulation system and impacts would be less than significant.

As previously discussed, the GPU EIR determined significant and unavoidable impacts to unincorporated County traffic and LOS standards. As the Project would have a less-than-significant impact for reasons stated 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.

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

Section 15064.3 of the CEQA Guidelines details new regulations, effective July 1, 2020 that sets forth specific considerations for evaluating a project's transportation impacts. Generally, VMT is the most appropriate measure of transportation impacts. VMT refers to the amount and distance of automobile travel attributable to a project. Other relevant considerations may include the effects of the project on transit and non-motorized travel. Except as provided regarding roadway capacity, a project's effect on automobile delay shall not constitute a significant environmental impact. As discussed in 17(a), the Project would be screened out from a VMT analysis and would not result in a significant direct or cumulative VMT impact, and mitigation measures are not required.

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, 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.

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

- 17(d) The GPU EIR concluded this impact to be significant and unavoidable. The 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 road from Lakeside Avenue would be improved and widened to 20 feet and would be designed to the latest County design standards with improved sight lines.

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 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.

- 17(e) The GPU EIR concluded this impact to be less than significant with mitigation. The Project would not result in inadequate emergency access. The Project includes the construction of a turn-around for fire apparatus on the proposed private road. The turn-around/access roads would be constructed to meet County Fire Code Standard 503.2.6. Driveways would be constructed to a minimum of 24-feet in width. In addition, consistent with GPU EIR mitigation measure Tra-4.2, the Project would implement the Building and Fire codes to ensure emergency vehicle accessibility.

As previously discussed, the GPU EIR determined impacts on emergency access as less than significant with mitigation. The Project would have a less-than-significant impact with the implementation of Project conditions of approval for adherence to the Building and Fire codes, consistent with GPU EIR Mitigation Measure Tra-4.2. 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 not new information of substantial importance than identified within the GPU EIR.

- 17(f) The GPU EIR concluded this impact to be less than significant with mitigation. The Project would not result in inadequate emergency access. The Project includes the construction of a turn-around for fire apparatus in the parking lot using the main access road and the western turnoff to the second (western) parking lot. The turn-around/access roads would be constructed to meet County Fire Code Standard 503.2.6. Driveways would be constructed to a minimum of 24-feet in width. In addition, consistent with GPU EIR mitigation measure Tra-4.2, the Project would implement the Building and Fire codes to ensure emergency vehicle accessibility.

As previously discussed, the GPU EIR determined impacts on emergency access as less than significant with mitigation. The Project would have a less-than-significant impact with the implementation of Project conditions of approval for adherence to the Building and Fire codes, consistent with GPU EIR Mitigation Measure Tra-4.2. 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 not new information of substantial importance than identified within the GPU EIR.

Conclusion

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

1. No peculiar impacts to the Project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. Feasible mitigation measures contained within the GPU EIR would be applied to the Project (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 Building and Fire Codes to ensure adequate services are in place.

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

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

Discussion

- 18(a) The GPU EIR concluded this impact to be less than significant with mitigation. The Project does not propose to discharge domestic waste to on-site wastewater systems (OSWS), also known as septic systems.

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

- 18(b) The GPU EIR concluded this impact to be less than significant with mitigation. The Project requires water service from the Lakeside Municipal Water District. According to water service availability form dated February 2020, adequate water resources and entitlements are available to serve the Project. In addition, the Project would utilize wastewater services from the San Diego County Sanitation District which has adequate services to serve the Project. Therefore, the Project would not require the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.

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, 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.

- 18(c) The GPU EIR concluded this impact to be less than significant with mitigation. The Project involves new storm water drainage facilities, however, these 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 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.

- 18(d) The GPU EIR concluded this impact to be significant and unavoidable. The Project would receive water from the Lakeside Municipal Water District which has adequate water to serve the Project according to the water service availability form dated February 2020. As the Project would have a less-than-significant impact, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 18(e) The GPU EIR concluded this impact to be less than significant with mitigation. The Project would require wastewater services from the San Diego County Sanitation District, which has adequate services available to serve the Project according the sewer service availability form dated February 2020. Therefore, the Project would not interfere with any wastewater treatment provider's service capacity.

As previously discussed, the GPU EIR determined impacts to adequate wastewater facilities to be less than significant with mitigation. As the Project would have a less-than-significant impact for the reasons detailed above, the Project would be consistent with the analysis within the GPU EIR because it would not create new impacts, increase impacts, and there is not new information of substantial importance than identified within the GPU EIR.

- 18(f) The GPU EIR concluded this impact to be less than significant. All solid waste facilities, including landfills require solid waste facility permits to operate. There are five, permitted active landfills in San Diego County with remaining capacity to adequately serve the Project. Therefore, the Project would be consistent with the analysis 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.
- 18(g) The GPU EIR concluded this impact to be less than significant. The Project would deposit all solid waste at a permitted solid waste facility. Therefore, the Project would be consistent with the analysis 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 regards to the issue area of Utilities and Service Systems, the following findings can be made:

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

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

- | | | | |
|---|--------------------------|--------------------------|--------------------------|
| a) Substantially impair an adopted emergency response plan or emergency evacuation plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

- 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.

19(a) The GPU EIR concluded this impact to be significant and unavoidable. The Project site is located within the Moderate Fire Hazard Severity Zone. The Project site is within the response area of the Lakeside Fire Protection District. The nearest fire station is Fire Station 2, located at 12216 Lakeside Ave, Lakeside, CA 92040, approximately 0.3 miles south. The project site has an Emergency Response Travel Time of less than five minutes, which meets the General Plan Safety Element standard of 5 minutes for lands designated as Semi-Rural Residential (SR-1).

The Project access from Valley Center Road would meet County road standards. A turn-around for fire apparatus would be constructed in the private road, designed to meet the County of San Diego Fire Code Standard 503.2.6.

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, increase impacts, and there is not new information of substantial importance than identified within the GPU EIR.

19(b) The GPU EIR concluded this impact to be significant and unavoidable. The Project is within the Moderate Fire Hazard Severity Zone and within the Urban-Wildland Interface Zone. The Project would comply with regulations relating to emergency access, water supply, and defensible space specified in the County Fire Code and Consolidated Fire Code. Specifically, all exterior walls would be 1-hour rated firewalls. All buildings would be fully sprinklered. Well-developed fuel treatments would be required throughout the entire site. A 20-foot wide, paved fire access road would be constructed off of Lakeside Avenue and would have a fire apparatus turn around built to reduce fire apparatus backing incidents. In addition, the Project includes a new fire hydrant along the proposed access road.

Implementation of these fire safety standards would occur during the building permit process and is consistent with GPU mitigation measure Haz-4.3. In addition, the Project is consistent with the Zoning Ordinance and the density established under the County of San Diego General Plan. Therefore, for the reasons stated above, the Project would not be expected to experience exacerbated wildfire risks due to slope, prevailing, winds or other factors.

As previously stated, Wildfire was analyzed within the GPU EIR within Section 2.7, Hazards and Hazardous Materials and was determined to be significant and unavoidable. 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 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(c) The GPU EIR concluded this impact to be significant and unavoidable. The Project would require the widening of an existing private road and the installation and maintenance of new private driveways. The Project also requires a minor water pipeline extension to connect to the Lakeside Water District. Sewer service would be provided by the San Diego County Sanitation District. All infrastructure associated with the Project has been incorporated within this analysis. Therefore, no additional temporary or ongoing impacts to the environment related to associated infrastructure would occur that have not been analyzed in other sections of this environmental document.

As previously discussed, the GPU EIR determined impacts from Wildfire to be significant and unavoidable. However, the Project would have a less-than-significant impact for the reasons detailed above. Therefore, the Project would be consistent with the analysis 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(d) The GPU EIR concluded this impact to be significant and unavoidable. As previously stated in 19(b), the Project would comply with regulations relating to emergency access, water supply, and defensible space specified in the County Fire Code and Consolidated Fire Code. The site is located within a "Landslide Susceptibility Area" as identified in the County Guidelines for Determining Significance for Geologic Hazards and is identified as Generally Susceptible to potential landslides. Based on review of the Project by County Staff Hydrogeologist and the topography of the site, potential hazards associated with landslides are less than significant. In addition, a soils compaction report with proposed foundation recommendation would be required to be approved prior to the issuance of a building permit. Additionally, Compliance with the County's Grading Ordinance and Building Code and implementation of standard engineering techniques will ensure structural safety. Therefore, for the reasons stated above, the project site would not expose people or structures to significant risk, including downslopes or downstream flooding or landslides, as a result of runoff, post-fire instability, or drainage changes.

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

Conclusion

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

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

Appendices

Appendix A – References

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

Appendix A

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

References

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

[http://www.sdcounty.ca.gov/PDS/gpupdate/docs/BOS_Aug2011/EIR/FEIR_5.00 -
_References_2011.pdf](http://www.sdcounty.ca.gov/PDS/gpupdate/docs/BOS_Aug2011/EIR/FEIR_5.00_-_References_2011.pdf)

Cummings, Gretchen; Cummings Environmental Inc. (January 2022), Biological Resource Letter Report Over APNs 392-070-10 and 392-070-07 on Lakeside Avenue.

De Boer, Patric; Omega Engineering and Consultants, (May 2022), Drainage Study for Hurrell Subdivision, Lakeside.

De Boer, Patric; Omega Engineering and Consultants, (October 2021), Stormwater Quality Management Plan for Priority Development Projects

Lauber, MarTin; The Perfect Solution Traffic Engineering and Transportation Planning (February 2022), Traffic Engineering Letter for Hurrell Subdivision

Williams, Brian; ASM Affiliates, Inc. (November 2020), Negative Cultural Resources Survey Report

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