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May 1, 2026

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

**Project Name:** Harbison Canyon Tentative Parcel Map  
**Project Record Numbers:** PDS2022-TPM-21316  
**Environmental Log Number:** PDS2022-ER-21-14-001

**APN(s):** 513-101-11-00

**Lead Agency Name and Address:**

County of San Diego  
Planning and Development Services  
5510 Overland Avenue, Suite 110  
San Diego, CA 92123-1239

**County Staff Contact:**

Martha Elena Sanchez, Environmental Planner  
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**Project Location:**

The proposed Harbison Canyon Tentative Parcel Map Project (project) is located on approximately 12.37 acres at 2030 Harbison Canyon Rd in the unincorporated community of Crest-Dehesa within the County of San Diego (Assessor's Parcel Number 513-101-11-00). The project location's regional location and vicinity are shown in Figure 1 and Figure 2.

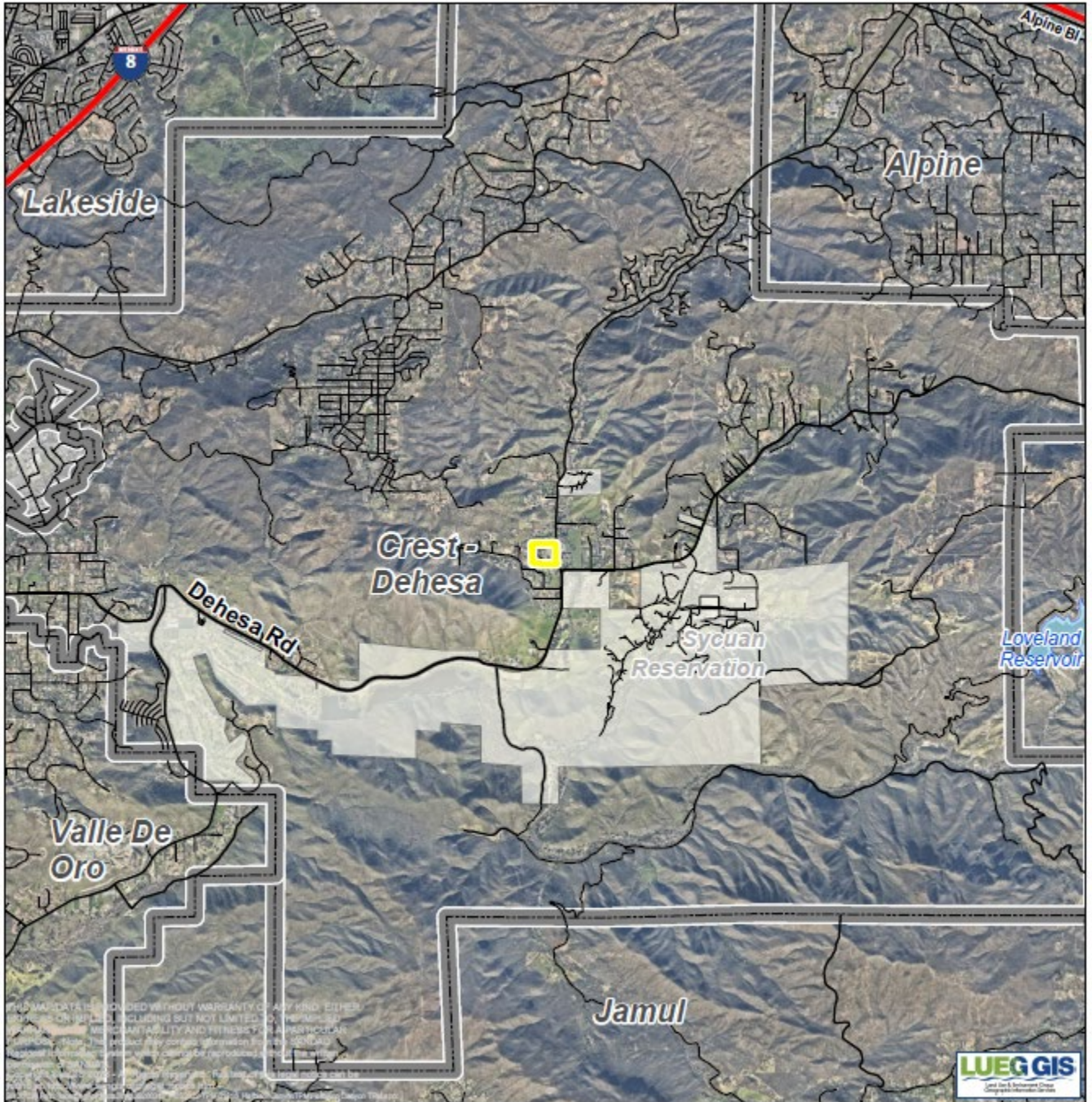


Figure 1 – Regional Location Map

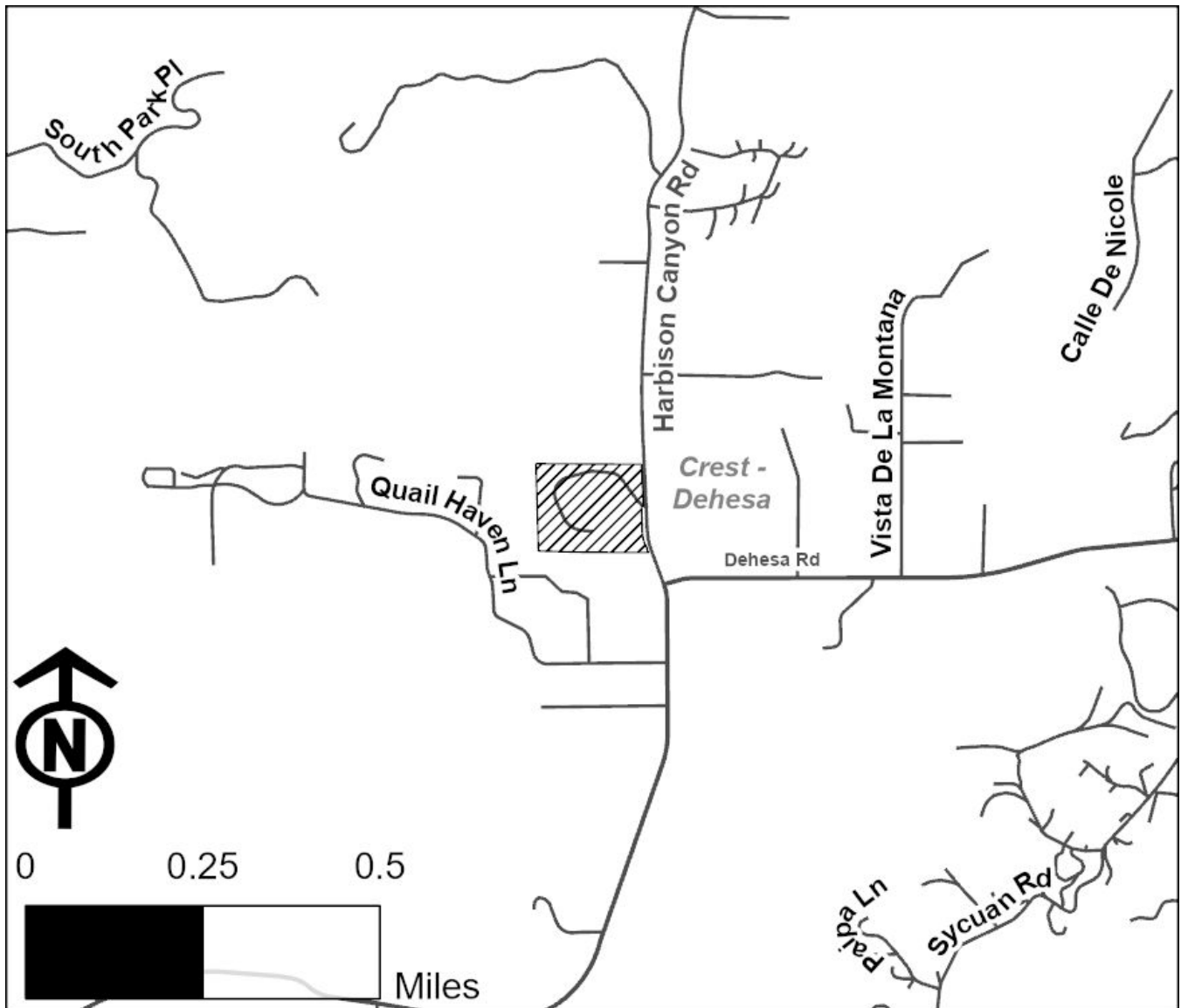


Figure 2 – Vicinity Map

**Project Applicant Name and Address:**

Nagham Sabah Hakeem  
 1233 Pfeifer Lane  
 El Cajon, CA 92020

**General Plan**

Community Plan:	Crest-Dehesa
Regional Categories:	-
Land Use Designations:	Semi-Rural (SR-1)
Density:	-
Floor Area Ratio (FAR):	-

**Zoning**

Use Regulation:	General Agriculture (A72)
Minimum Lot Size:	1 acre

Special Area Regulation: -

**Description of Project:**

The project is a Tentative Parcel Map (TPM) to divide a 12.37-acre parcel into four single-family lots with one remainder parcel. There is one existing single-family home to remain on Parcel 4, and another existing single-family home to remain on the remainder parcel. The project fronts Harbison Canyon Road. Access would be provided by a new private street (Private Street "A") connecting to Harbison Canyon Road to the east. The project would be served by on-site septic systems and imported water from the Padre Dam Municipal Water District. No extension of sewer and water utilities would be required by the project. Earthwork would consist of a cut of 12,700 cubic yards of material and fill of 11,400 cubic yards of material. The site is subject to the General Plan Semi-Rural Regional Category, Semi-Rural 1 (SR-1) Land Use Designation. The zoning for the site is General Agriculture (A72).

**Overview of 15183 Checklist**

California Public Resources Code (PRC) 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. CEQA Guidelines 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. CEQA Guidelines 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 Section 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 GPU Final Program EIR (ER #02-ZA-001, SCH #2002111067), and all required findings can be made.

In accordance with CEQA Guidelines Section 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 12.37-acre property into four single-family lots with one remainder parcel, 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 Section 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, and tribal cultural resources. 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. The GPU EIR considered the incremental impacts of the project, and as explained further in the Section 15183 Exemption Checklist below, no potentially significant off-site or cumulative impacts have been identified which were not previously evaluated.

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

As explained in the Section 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 Section 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 1, 2026 Date
_____ Martha Elena Sanchez Printed Name	_____ Environmental Planner Title

## CEQA Guidelines §15183 Exemption Checklist

### Overview

This checklist provides an analysis of potential environmental impacts resulting from the project. Following the format of CEQA Guidelines Appendix G, environmental effects are evaluated to determine if the project would result in a potentially significant impact triggering additional review under CEQA 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 Section 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
<b>1. AESTHETICS</b> – 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 (GPU) Environmental Impact Report (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 north of the intersection of Harbison Canyon Road and Dehesa Road in Crest Dehesa Community Plan in the unincorporated County of San Diego. The County of San Diego General Plan and Crest Dehesa Community Plan identified two RCAs near the project including McGinty/Dehesa/Sequan peaks and Harbison Canyon Gorge. The project site is located at the southern end of the Harbison Canyon Gorge. Surrounding land uses consist of similar rural single-family residences to the west, south, and north. Due to distance and intervening highways, structures, and topography, no impacts would occur to these RCAs. Additionally, given that the project would be consistent with the rural residential environment surrounding the project site, the proposed project would not substantially degrade a scenic vista.

The project site is located in the vicinity of several public trails, including the Harbison Canyon Road Trail. The 12.37-acre project site would be divided into four lots, which will remain as residential uses. As the project is consistent with the existing residential land uses surrounding the project site, it 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 proposed project would have a less-than-significant impact for the reasons detailed above, the project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 1(b) The GPU EIR concluded this impact to be less than significant with mitigation. State scenic highways refer to those highways that are officially designated by 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 located near or visible within the composite viewshed of a State scenic highway and would not damage or remove visual resources within a State scenic highway. The nearest eligible State scenic highway is Interstate 8, which is located 5 miles to the north. The nearest designated State scenic highway is a portion of State Route 52 125 located more than 9 miles west of the project site. As such, the project site is not visible within the composite viewshed of a State scenic highway or County Scenic Corridor and would not damage or remove visual resources within a State scenic highway or County Scenic Corridor. Therefore, impacts would be less than significant.

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

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

The project site is currently developed with two existing single-family homes and an attached garage. The majority of the properties surrounding the project site are developed with rural residential uses. The visual character surrounding the project site is characterized by rural single-family residences and commercial uses to the east.

The project would not detract from, or contrast with the existing visual character and/or quality of the surrounding areas. The project proposes four single-family residences, which is consistent with the General Plan density and the planned uses within the Crest Dehesa Community Plan for the project site and the surrounding area. The resulting uses within

the project site will be similar to those developed in the surrounding area. Additionally, the proposed design of the development footprint would be compatible with uses in the immediate area. By resulting in a development similar to the existing visual environment, the project would not result in any change to visual character.

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

- 1(d) The GPU EIR concluded this impact to be significant and unavoidable. The project would create three new residential lots by dividing a 12.37-acre property into four lots. The future uses in the project area would likely use outdoor lighting, but the project area 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 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 spillovers onto adjacent properties and minimize impacts to dark skies. Compliance with the Code would be required prior to the issuance of a building permit. The Code was developed by the County in cooperation with lighting engineers, astronomers, and other experts to effectively address and minimize the impact of new sources 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. However, the proposed project would have a less-than-significant impact with no required mitigation for the reasons detailed above. Therefore, the project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

## **Conclusion**

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

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

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

An Agricultural Resources Review Memo was prepared for the project by Mark Kieser, Staff Agricultural Specialist on October 26, 2022. The following resources incorporate the analysis within the memo.

2(a) The GPU EIR concluded this impact to be significant and unavoidable. Based on the County of San Diego Geographical Information System (GIS) and aerial imagery, the project site does not contain any agricultural resources. Additionally, according to the California Department of Conservation (DOC) California Important Farmland Finder, the project site is not located on lands designated as 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. Therefore, no agricultural resources including Prime Farmland, Unique Farmland, or Farmland of Statewide or Local Importance would be converted to a non-agricultural use.

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

2(b) The GPU EIR concluded this impact to be less than significant with mitigation. The project site is not under a Williamson Act Contract. The project site is designated as General Agriculture. Single-family residential units are a compatible use within the General

Agriculture zone. Therefore, the project does not conflict with existing zoning for agricultural use, or a Williamson Act Contract.

As previously discussed, the GPU EIR determined impacts from land use conflicts to be less than significant with mitigation. As the proposed project would have no impact for the reasons detailed above, the project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 2(c) The GPU EIR concluded this impact to be significant and unavoidable. The project site does not contain forest lands or timberland. The County of San Diego does not have any existing Timberland Production Zones. In addition, the project is consistent with existing zoning, and a rezone is not proposed. Therefore, project implementation would not conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland production zones.

As previously discussed, the GPU EIR determined impacts from direct and indirect conversion of agricultural resources (including forest resources), to be significant and unavoidable. However, the project would have no impact on forest resources. 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(d) The GPU EIR concluded this impact to be significant and unavoidable. 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. The project site is not an active agricultural operation, was not designated as an important FMMP land use category, does not have at least 10 acres of contiguous prime farmland soil, and does not have a history of agricultural production based on aerial photography or other data sources. Therefore, the project would not result in any conversion of onsite agricultural resources to a non-agricultural use.

As previously discussed, the GPU EIR determined impacts from direct and indirect conversion of agricultural resources (including forest resources) to be significant and unavoidable. However, the proposed project determined no impacts would occur on agricultural resources. Therefore, the project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

## **Conclusion**

With regards to the issue area of 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
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**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) 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"/> |
| c) Expose sensitive receptors to substantial pollutant concentrations?  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| d) Create objectionable odors affecting a substantial number of people?   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

**Discussion**

The following is based on an Air Quality Assessment prepared for the project by LDN Consulting, dated November 2024.

- 3(a) The GPU EIR concluded this impact to be less than significant. The regional air quality standards (RAQS) and State Implementation Plan (SIP) rely on the San Diego Association of Government’s (SANDAG’s) growth projections, which are developed based on proposed buildout of land uses identified in the County’s General Plan. Because the RAQS and SIP project future air quality conditions based on growth projections assuming buildout of the County’s General Plan, it is assumed that a project involving development that is consistent with the growth anticipated by the County’s General Plan are consistent with the RAQS and SIP. According to the 2022 RAQS, mobile sources are the largest contributor to air quality emissions, specifically emissions generated from operations of typical residential and commercial developments, and therefore, can be used to define project intensity (i.e., less mobile emissions results in less land use intensity).

The project would include construction activities for and operation of up to four single-family homes. The project would also consist of the operation of the two existing residences that would remain. 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. Earthwork consists of 12,700 cubic yards of cut and 11,400 cubic yards of fill. 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. As the proposed project would have a less-than-significant for the reasons detailed above, the project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

3(b) The GPU EIR concluded impacts to be significant and unavoidable. San Diego County is currently in non-attainment for ozone (O<sub>3</sub>) under the National Ambient Air Quality Standard (NAAQS). San Diego County is also presently in non-attainment for O<sub>3</sub>, particulate matter less than or equal to 10 microns (PM<sub>10</sub>), and particulate matter less than or equal to 2.5 microns (PM<sub>2.5</sub>) under the California Ambient Air Quality Standard (CAAQS). O<sub>3</sub> is formed when volatile organic compounds (VOCs) and nitrogen oxides (NO<sub>x</sub>) 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<sub>x</sub> include any source that burns fuel. Sources of PM<sub>10</sub> and PM<sub>2.5</sub> in both urban and rural areas include the following: motor vehicles, wood burning stoves and fireplaces, dust from construction, landfills, agriculture, wildfires, brush/waste burning, and industrial sources of windblown dust from open lands.

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

Pollutant	Emission Rate		
	Pounds/Hour	Pounds/Day	Tons/Year
Respirable Particulate Matter (PM <sub>10</sub> )	--	100	15
Fine Particulate Matter (PM <sub>2.5</sub> )	--	55 <sup>a</sup>	10 <sup>a</sup>
Oxides of Nitrogen (NO <sub>x</sub> )	25	250	40
Oxides of Sulfur (SO <sub>x</sub> )	25	250	40
Carbon Monoxide (CO)	100	550	100
Lead and Lead Compounds	--	3.2	0.6
Volatile Organic Compounds (VOCs)	--	75 <sup>b</sup>	13.7 <sup>c</sup>

SOURCE: SDAPCD, Rules 20.1, 20.2, 20.3; County of San Diego 2007.  
<sup>a</sup> Based on the U.S. EPA “Proposed Rule to Implement the Fine Particle National Ambient Air Quality Standards” published September 8, 2005. Also used by the South Coast Air Quality Management District.  
<sup>b</sup> Threshold for VOCs based on the threshold of significance for VOCs from the South Coast Air Quality Management District for the Coachella Valley.  
<sup>c</sup> 13.7 tons per year threshold based on 75 pounds per day multiplied by 365 days per year and divided by 2,000 pounds per ton.

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

- Per the County’s Standard Mitigation and Project Design Consideration Grading, Clearing and Watercourses Ordinance Section 87.428, the applicant shall implement one or more of the following measures during all grading activities:
  - Water actively disturbed surfaces three times a day.
  - Apply non-toxic soil stabilizers to inactive, exposed surfaces when not in use for more than 3 days. Non-toxic soil stabilizers should also be applied to any exposed surfaces immediately (i.e., less than 24 hours) following completion of grading activities if the areas would not be in use for more than 3 days following completion of grading.
  - Remove soil track-out from paved surfaces daily or more frequently as necessary.
  - Minimize the track-out of soil onto paved surfaces by installation of wheel washers.

Air emissions were calculated using California Emissions Estimator Model (CalEEMod) 2022.1. CalEEMod is a tool used to estimate air emissions resulting from land development projects in the state of California. The model generates air quality emission estimates from construction activities and breaks down operational criteria pollutant emissions into three categories: mobile sources (e.g., traffic), area sources (e.g., landscaping equipment, consumer projects, and architectural coatings), and energy sources (e.g., natural gas heating). CalEEMod provides emission estimates of NO<sub>x</sub>, carbon monoxide (CO), oxides of sulfur (SO<sub>x</sub>), respirable particulate matter (PM<sub>10</sub>), fine particulate matter (PM<sub>2.5</sub>), and VOCs. Inputs to CalEEMod include such items as the air basin containing the project, land uses, trip generation rates, trip lengths, duration of construction phases, construction equipment usage, grading areas, as well as other parameters.

**Construction**

Emissions from construction activities and equipment use are shown in Table 3 below. Based on these numbers, the project would not exceed County SLTs. Consequently, project construction would have a less than significant impact on public health. Therefore, project construction would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard, and impacts would be less than significant.

**Table 3: Expected Maximum Daily Emissions– Pounds per Day (lb/day)**

Year	VOC	NO <sub>x</sub>	CO	SO <sub>2</sub>	PM <sub>10</sub> (Total)	PM <sub>2.5</sub> (Total)
2026	4.33	8.10	10.83	0.02	6.92	3.65
Screening Level Threshold (lb/day)	75	250	550	250	100	55
percent lower than Standard	94.23%	96.76%	98.03%	99.99%	93.08%	93.36%

<b>Exceeds Threshold?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>
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Source: Ldn Consulting Inc. 2024

The project would include construction activities for and operation of up to four single-family homes. The project would also consist of the operation of the two existing residences to remain. The expected daily pollutant generation is calculated in CalEEMod 2022.1 and is shown for the summer and winter scenarios in Tables 4 and 5 below. Based on these results, the project would have a less than significant impact in the County once fully operational and includes VOCs, NO<sub>x</sub>, CO, SO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub>.

**Table 4: Expected Summer Daily Pollutant Generation**

	VOC	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
Mobile	0.14	0.13	1.48	< 0.005	0.36	0.09
Area	4.74	0.09	5.84	0.01	0.78	0.78
Energy	< 0.005	0.02	0.01	< 0.005	< 0.005	< 0.005
<b>Total (Unmitigated)</b>	<b>4.88</b>	<b>0.25</b>	<b>7.33</b>	<b>0.01</b>	<b>1.14</b>	<b>0.87</b>
Screening Level Threshold (lb/day)	75	250	550	250	100	55
<b>Exceeds Threshold?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>
Daily pollutant generation assumes trip distances within CalEEMod. The final numbers are all rounded within Excel and are reported as rounded numbers.						

Source: Ldn Consulting Inc. 2024

**Table 5: Expected Winter Daily Pollutant Generation**

	VOC	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
Mobile	0.14	0.15	1.34	< 0.005	0.36	0.09
Area	4.72	0.09	5.67	0.01	0.78	0.78
Energy	< 0.005	0.02	0.01	< 0.005	< 0.005	< 0.005
<b>Total (Unmitigated)</b>	<b>4.86</b>	<b>0.26</b>	<b>7.02</b>	<b>0.01</b>	<b>1.14</b>	<b>0.87</b>
Screening Level Threshold (lb/day)	75	250	550	250	100	55
<b>Exceeds Threshold?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>
Daily pollutant generation assumes trip distances within CalEEMod. The final numbers are all rounded within Excel and are reported as rounded numbers.						

As described above, the County’s SLTs align with attainment of the NAAQS which were developed to protect the public health, specifically the health of “sensitive” populations, including asthmatics, children, and the elderly. Therefore, project operation would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard, and impacts would be less than significant.

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 on 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 or increase impacts than identified within the GPU EIR.

- 3(c) 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 12.37 acres into four lots with a remainder parcel. 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. Projects that would result in exposure to toxic air contaminants (TACs) resulting in a maximum incremental cancer risk greater than one in one million without application of best available control technology for toxics, or a threshold of 10 in one million for projects implementing best available control technology for air toxics or a health hazard index greater than one, would be considered as having a potentially significant impact.

Construction of the project would result in the generation of DPM emissions from the use of off-road diesel construction activities and on-road diesel equipment used to bring materials to and from the project site. Generation of DPM from construction projects typically occurs in a single area for a short period. Construction of the project would occur over an 11-month period. Dose is positively correlated with time, meaning that a longer exposure period would result in a higher exposure level for the Maximally Exposed Individual. The risks estimated for a Maximally Exposed Individual are higher if a fixed exposure occurs over a longer period of time. According to the California Office of Environmental Health Hazard Assessment (OEHHA), health risk assessments (HRA), which determine the exposure of sensitive receptors to toxic emissions, should be based on a 30-year exposure period (assumed to be the approximate time that a person spends at a single household location). OEHHA recommends this risk be bracketed with nine-year and 70-year exposure periods and that HRA should be limited to the period/duration of activities associated with the project (OEHHA 2015).

The project would incorporate the use of diesel equipment onsite that would be at least Tier 3 with DPFs installed or better during grading and construction of the project. Based upon the air quality modeling, worst-case PM<sub>10</sub> from exhaust onsite during each of the construction tasks would cumulatively produce 0.00216 tons over the construction duration 316-days or an average of 0.000072 grams/second.

Utilizing the AERSCREEN dispersion model, the worst-case annual concentration would be 0.021 µg/m<sup>3</sup> during construction. The inhalation cancer risk for the worst-case receptor was found to be 3.34 per one million exposed which would be considered a less than significant impact if T-BACT equipment is utilized. Since Tier 3 T-BACT equipment would be utilized as a design feature and as a condition of the project, the project construction activities would generate less than significant cancer health risks.

Additionally, the proposed residential use is not a TAC emitter and would not constitute a cancer risk to sensitive receivers. Therefore, construction and operation of the proposed

project would not generate significant amounts of TACs that would adversely impact sensitive receptors in the vicinity of the project site.

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

- 3(d) The project could produce objectionable odors during construction of the residences, however, these substances, if present at all, would only be in trace amounts. 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 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.

<b>Significant Project Impact</b>	<b>Impact not identified by GPU EIR</b>	<b>Substantial New Information</b>
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**4. Biological Resources – Would the Project:**

a) Have a substantial adverse effect, either directly or through habitat modifications, on any candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?

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

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

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

**Discussion**

The following is based on the Biological Resources Letter Report prepared for the project by Vincent Scheidt, dated June 2025.

4(a) The GPU EIR concluded this impact to be significant and unavoidable. The project site contains non-native grassland, disturbed/developed habitat, non-native vegetation, southern coast live oak riparian forest, disturbed coastal sage scrub, and coastal sage-chaparral scrub. Four special status or "sensitive" species were detected during the survey. These are San Diego County Viguiera (*Bahiopsis laciniata*), Campo Clarkia (*Clarkia delicata*), Orange-throated Whiptail (*Aspidosceli hyperythrus beldingi*), and Red-shouldered Hawk (*Buteo lineatus*).

In addition, due to the presence of scrub vegetation onsite and records of California Gnatcatchers within 5 miles of the project site, a direct habitat evaluation for California Gnatcatcher (*Polioptila californica*), a rare and federally listed threatened species was conducted as part of the site survey work. It was determined that insufficient habitat was present onsite to warrant protocol surveys and the site is considered "unoccupied" by this species. The scrub vegetation on and adjacent to the project site consists of small patches that are isolated by rural residential developments and disturbed lands.

Quino Checkerspot Butterfly (*Euphydryas editha quino*) is a federally-listed Endangered invertebrate known to occur in portions of San Diego and Riverside County. The project site does not support any features that might constitute Quino "indicators" including Dot-seed Plantain or other larval food plants and the overall density of the groundcover at the project site.

The project site is within the known range of Crotch's Bumble Bee, and it supports habitat that is potentially suitable for this species. The Crotch's Bumble Bee is currently in candidacy to become state listed as California Endangered or Threatened Species A focused field survey were performed for the Crotch's Bumble Bee (*Bombus crotchii*). Crotch's Bumble Bee was not observed onsite during any of the field surveys.

The project would impact 0.29 acre of southern coast live oak riparian forest, 0.1 acre of disturbed coastal sage scrub, 0.2 acre of coastal sage-chaparral scrub, and 8.4 acres of

non-native grassland. The project would also have the potential to impact two specimens of San Diego County Viguiera and a few specimens of Campo Clarkia growing near the northern edge of the property. This impact would be significant. In addition, the project would have the potential to impact foraging habitat for Red-shouldered Hawk, which was observed soaring in the vicinity and habitat occupied by Orange-throated Whiptails. This impact would be potentially significant.

Consistent with mitigation measure Bio-1.5 in the GPU EIR, the project utilizes the County's Guidelines for Determining Significance for Biological Resources (County of San Diego 2010) to identify adverse impacts to biological resources. In addition, consistent with mitigation measure Bio-1.6 in the GPU EIR, the project implements the County's Resource Protection Ordinance, Biological Mitigation Ordinance, and Habitat Loss Permit Ordinance. project impacts to sensitive habitat and/or species would be mitigated through ordinance compliance and through implementation of the following mitigation measures: Offsite purchase of 0.1 acre of disturbed coastal sage scrub, 0.2 acre of coastal sage-chaparral scrub, 4.2 acres of non-native grassland, and 0.29 acres of southern coast live oak riparian forest at a County approved conservation bank and breeding season avoidance to prevent brushing, clearing, and/or grading between February 15th and August 31<sup>st</sup>. Therefore, implementation of mitigation measure BIO-1, BIO-2, and BIO-3, which is consistent with mitigation measures Bio-1.5 and Bio-1.6 in the GPU EIR, would reduce impacts to a less than significant level.

As previously discussed, the GPU EIR determined impacts to special status species as significant and unavoidable. The project impacts were also determined to be potentially significant. However, the proposed project would incorporate the GPU EIR mitigation measures Bio-1.5 and Bio-1.6 for a less than significant impact with mitigation. Therefore, the project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

#### **BIO-1 Habitat Conservation (consistent with Bio-1.5 and Bio-1.6)**

- 0.1 acre of disturbed Coastal Sage Scrubb shall be mitigated at a 1:1 ratio, according to the County's Biology Guidelines and the Biological Mitigation Ordinance. This shall require that 0.1 acre of Tier II or "better" habitat be mitigated within an approved offsite conservation bank.
- 0.2 acre of Coastal Sage Scrub Chaparral shall be mitigated at a 1:1 ratio, per the County's Biology Guidelines and the Biological Mitigation Ordinance. This shall require that 0.2 acre of Tier II or "better" habitat be mitigated within an approved offsite conservation bank.
- 8.4 acres of non-native grassland shall be mitigated at a 0.5:1 ratio, per the County's Biology Guidelines and the Biological Mitigation Ordinance. This shall require that 4.2 acres of Tier III or "better" habitat be mitigated within an approved offsite conservation bank.
- 0.29 acre of Southern Coast Live Oak Riparian Forest shall be mitigated at a 1:1 ratio, per the County's Biology Guidelines and the Biological Mitigation Ordinance. This shall require that 0.29 acres of Tier I or "better" habitat be mitigated within an approved offsite

#### **BIO-2 Special Status Species (consistent with Bio-1.5 and Bio 1.6)**

Mitigation to Red-shouldered Hawk, Orange-throated Whiptail, Campo Clarkia, and San Diego County would be provided in conjunction with the habitat mitigation measures outlined in BIO-1.

#### **BIO-3 Breeding Season Avoidance (consistent with Bio-1.6)**

Any site brushing, grading, and/or the removal of native vegetation within 300 feet of any potential migratory songbird or 500 feet of raptor nesting habitat should not take place during the spring/summer songbird breeding season, defined as from 1 February to 31 August of each year. Should it be necessary to conduct brushing, grading, or other construction activities during the bird breeding season, a preconstruction nesting survey of all areas within 300 feet of the proposed activity will be required. The results of the survey will be provided in a report to the Director; Planning and Development Services and the Wildlife Agencies (California Department of Fish and Wildlife, U.S. Fish and Wildlife Service) for concurrence with the conclusions and recommendations.

- 4(b) The GPU EIR concluded this impact to be significant and unavoidable. Based on the Biological Resource Letter Report, the project would result in impacts to non-native grassland, southern coast live oak riparian forest, disturbed coastal sage scrub, and coastal sage-chaparral scrub. Consistent with mitigation measure Bio-1.5 in the GPU EIR, the project would utilize the County's Guidelines for Determining Significance for Biological Resources to identify adverse impacts to biological resources. Implementation of mitigation measure Bio-1, consistent with the GPU EIR mitigation measures Bio-1.5 and Bio-1.6, would reduce impacts to non-native grassland, southern coast live oak riparian forest, disturbed coastal sage scrub, and coastal sage-chaparral scrub to a less than significant level.

As previously discussed, the GPU EIR determined impacts to riparian habitat and other sensitive natural communities as significant and unavoidable. The project impacts were also determined to be potentially significant. However, the proposed project would incorporate Mitigation Measures BIO-1 which is consistent with Bio-5 and Bio-6 for a less than significant impact with mitigation. Therefore, the project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 4(c) The GPU EIR concluded this impact to be less than significant with mitigation. As discussed in the Biological Resources Letter Report. A minor swale feature runs mostly offsite along the northern edge of the project site. This upland swale exhibits no clear hydrology indicators; neither a bed-and-bank nor any kind of ordinary high-water mark. In addition, the onsite swale does not qualify as a wetland or waters based on an absence of hydrophytes, hydric soils, or evident hydrology. The dominant plants within the swale consist of upland native and non-native species. Therefore, this feature would not be classified as a federally protected wetlands defined by Section 404 of the Clean Water Act.

As previously discussed, the GPU EIR determined impacts to federally protected wetlands as less than significant with mitigation. However, the project would not result in impacts to protected wetlands for the reasons detailed above. Therefore, the project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 4(d) The GPU EIR concluded this impact to be significant and unavoidable. The Biological Resources Letter Report determined that because of the project site's mostly-disturbed nature, it lacks unique features or resources that would enhance its local or regional biological significance. Therefore, the project site does not contain any significant wildlife movement corridors or wildlife nursery sites. Therefore, impacts to wildlife corridors would be less than significant.

As previously discussed, the GPU EIR determined impacts to wildlife movement corridors as significant and unavoidable. However, the proposed project would have a less-than-significant impact with 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 increase impacts identified within the GPU EIR.

- 4(e) The GPU EIR concluded this impact to be less than significant. The project site is located in the South County Multiple Species Conservation Program (MSCP) Subarea Plan and outside a Pre-Approved Mitigation Area or Biological Resource Core Area. The project is consistent with the South County MSCP, Biological Mitigation Ordinance, and Resource Protection Ordinance because mitigation would be required to compensate for the loss of significant habitat. Therefore, the project would not conflict with the provisions of any adopted Habitat Conservation Plan, Natural Communities Conservation Plan, other approved local, regional, or state habitat conservation plan or any other local policies or ordinances that protect biological resources.

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

1. No peculiar impacts to the project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. Mitigation measures Bio-1, Bio-2, and Bio-3 as outlined above are consistent with the GPU EIR mitigation measures Bio-1.5 and Bio-1.6, which would 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?
- e) Disturb any human remains, including those interred outside of formal cemeteries?

**Discussion**

A Cultural Resources Inventory was prepared for the project by Laguna Mountain Environmental, Inc., dated May 2024. The following responses have incorporated the analysis from the memo.

5(a) The GPU EIR concluded this impact to be less than significant with mitigation. County records, as well as the database from the South Coastal Information Center has been reviewed and it has been determined that the project site has been previously surveyed, but no cultural resources were identified within the project site. There are no existing buildings on the project site that could be considered a historical resource as defined by CEQA. The project is consistent with surrounding single-family residential uses. Therefore, no impact on historical resources would occur.

As previously discussed, the GPU EIR determined impacts on historic resources to be less than significant with mitigation. The proposed project was determined to have no impact on historic resources. Therefore, the project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

5(b) The GPU EIR concluded this impact to be less than significant with mitigation. County records, as well as the database from the South Coastal Information Center have been reviewed and it has been determined that the project site has been previously surveyed, but no cultural resources were identified.

The project area was surveyed on November 2, 2023, and resulted in the identification of one previously unrecorded prehistoric site (CA-SDI- 23515). CA-SDI-23515 is a bedrock milling station with an associated sparse lithic scatter. The current project footprint would avoid this feature. Consistent with GPU Mitigation Measure Cul-2.3 a dedicated open space easement would be granted to the County of San Diego over a portion of Parcel 4. This easement (including adequate buffers) is for the protection of archaeological site CA-SDI- 23515 and would prohibits all of the following on any portion of the land subject to said easement: grading; excavation; placement of soil, sand, rock, gravel, or other material; clearing of vegetation; construction, erection, or placement of any building or structure; vehicular activities; trash dumping; or use for any purpose other than as open space.

In addition, the project includes grading and excavation. The project includes soil deposits where cultural resources could be buried and/or obscured by surface vegetation. The presence of cultural resources in the area provides support for the potential for buried cultural resources. Implementation of a grading monitoring would reduce any potential adverse impacts to unknown buried resources from the project.

Consistent with the GPU EIR, potential impacts to cultural resources will be mitigated through ordinance compliance and through implementation of the following mitigation measures: grading monitoring under the supervision of a County-approved archaeologist and a Kumeyaay Native American monitor and conformance with the County’s Cultural Resource Guidelines if resources are encountered. The GPU EIR identified these

mitigation measures as Cul 2.5. The project 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 monitoring of native soils will be determined by the Project Archaeologist in consultation with the Kumeyaay Native American monitor. Both the Project Archaeologist and Kumeyaay Native American monitor will evaluate fill soils to ensure 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 will be allowed to resume after the County Archaeologist has concurred with the significance evaluation.
    - Isolates and non-significant deposits shall be minimally documented in the field.
    - Should the isolates and non-significant deposits not be collected by the Project Archaeologist, the Kumeyaay 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:
    - The Property Owner or their representative shall contact the County Coroner and the PDS Staff Archaeologist.
    - Upon identification of human remains, no further disturbance shall occur in the area of the find until the County Coroner has made the necessary findings as to origin. If the human remains are to be taken offsite for evaluation, they shall be accompanied by the Luiseño Native American monitor.
    - If the remains are determined to be of Native American origin, the 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 a qualified archaeologist identifying whether resources were encountered. A

copy of the monitoring report shall be provided to the South Coastal Information Center and any culturally-affiliated tribe who requests a copy.

- Final Grading

- Final Report. A final report shall be prepared by a qualified archaeologist substantiating that earth-disturbing activities are completed and whether cultural resources were encountered. A copy of the final report shall be submitted to the South Coastal Information Center and any culturally-affiliated tribe who requests a copy.
- Cultural Material Conveyance.
  - The final report shall include evidence that all 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 determined impacts to archaeological resources as potentially significant. However, the project would incorporate the GPU EIR mitigation measure Cul-2.5 for a less than significant impact with mitigation. Therefore, the project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

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

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

- 5(d) The GPU EIR concluded this impact to be less than significant with mitigation. A review of the County's Paleontological Resources Maps and data on San Diego County's geologic formations indicates that the project is located on geological formations that do not contain unique paleontological resources. As such, a paleontological grading monitoring program is not required.

- 5(e) The GPU EIR concluded this impact to be less than significant with mitigation. Based on an analysis of records and the database from the South Coastal Information Center, it has been determined that the project is not likely disturb any human remains because the project site does not include a formal cemetery or any archaeological resources that might contain interred human remains. In the unlikely event that human remains are encountered onsite during earth-disturbing activities, GPU EIR mitigation measure Cul-2.5 would ensure that state and federal laws and regulations regarding human remains (i.e., Public Resources Code §5097.98, CEQA Guidelines §15064.5 and Health & Safety Code §7050.5) are followed.

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 increase impacts identified within the GPU EIR.

**Conclusion**

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

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

<b>Significant Project Impact</b>	<b>Impact not identified by GPU EIR</b>	<b>Substantial New Information</b>
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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. GPU Policies COS-15.1, COS-15.2, and COS-15.3 would support this goal by encouraging design and construction of new buildings and upgrades of existing buildings to maximize energy efficiency and reduce GHGs. Goal COS-17 promotes sustainable solid waste management. Policies COS-17.1 and COS-17.5 would support this goal by reducing GHG emissions through waste reduction techniques and methane recapture. The analysis below specifically analyzes the energy use of the project.

- 6(a) The project would result in the use of electricity, petroleum, and other consumption of energy resources during both the construction and operation phases of the project; however, the consumption is not expected to be wasteful, inefficient, or unnecessary for the following reasons.

During construction, the project would require the use of heavy construction equipment that would be fueled by gas and diesel. However, the energy use would be temporary, limited, and cease upon completion of construction activities. Construction would be conducted in compliance with local, state, and federal regulations (e.g., United States Environmental Protection Agency [USEPA] and the CARB engine emission standards, which require highly efficient combustion systems that maximize fuel efficiency and reduce unnecessary fuel consumption, and limitations on engine idling times). Compliance with these regulations would minimize short-term energy demand during the project's grading to the extent feasible.

In addition, all new construction would be required to comply with the energy code in effect at the time of construction, which ensures efficient building construction. The project would also be required to comply with Title 24 energy standards for energy efficiency. Project design features that would result in lower energy use include enhanced energy efficiency, water-efficient landscaping and fixtures, solar photovoltaic (PV) provisions consistent with the requirements for residential land uses, electric vehicle (EV) charging in compliance with EV requirements in the most recently adopted version of the California Green Building Standards Code, Title 24, Part 11 (CALGreen), and diversion of construction waste in compliance with CALGreen Tier 2 standards. Additional measures, such as recycling and composting, would be employed by the project. Therefore, the construction and operation of the project is not expected to result in wasteful or inefficient use of energy, and impacts would be less than significant.

The project would use only the amount of energy necessary for the construction and operation of the proposed rural single-family residence that is typical of this type of development. The proposed project would be consistent with the General Plan land uses and SANDAG growth projections. Therefore, the project would not result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation.

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:

- Incorporation of Title 24 energy standards.
- Landscaping in compliance with the County's Water Conservation in Landscaping Ordinance demonstrating a 40% water reduction for Outdoor use.
- Construction and demolition recycling in compliance with County Ordinance Section 68.511 through 68.520 (Diversion of Construction and Demolition Materials from Landfill Disposal).
- Installation of Electric or Alternatively Fueled Water Heating Systems which could include solar thermal, electric tankless, or electric heat pump systems.
- Installation of Water Efficient Appliances and Plumbing fixtures to include low flow faucets and Energy Star dishwashers or clothes washers

- Installation of at least 2 kilowatts (kW) of solar on each of the new residential units (6,000 kW Total between all three residential units).
- Installation of wiring for Electric Vehicle (EV) supply Equipment (EVSE). [JW4.1][LDN4.2] – Three Total (California - CGBSC, 2022) consistent with CALGreen Tier 2 requirements for single-family residences

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

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

**Conclusion**

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

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

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

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

- d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?
- e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

**Discussion**

7(a)(i) The GPU EIR concluded this impact to be less than significant. The project site is not located on or in proximity to any known active or potentially active fault traces. Other active fault zones in the region that could possibly affect the project site include the Newport-Inglewood-Rose Canyon Fault Zone System, Coronado Bank Fault, Elsinore Fault, San Diego Trough Fault Zone, San Clemente Fault Zone, and San Jacinto Fault. Due to the distance of these faults from the project site, project construction would not result in substantial adverse effects from ground surface rupture at any of these faults. Therefore, impacts would be less than significant.

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. The report would review the qualities of the soil, its expansive characteristics, relative compaction and any soil problem which if not corrected may lead to structural defects of buildings or structures constructed or to be constructed on the site. During the review of the building permit, the County Building Official shall review the report and ensure measures are taken to prevent structural damage to future buildings or structures to be constructed on the site. Therefore, compliance with the California Building Code and the County Building Code would ensure that the project would not result in a significant impact.

7(a)(iii) The GPU EIR concluded this impact to be less than significant. The project site is within a "Potential Liquefaction Area" as identified in the County Guidelines for Determining Significance for Geologic Hazards. This indicates that there is liquefaction potential at the site. The project would 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.

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

7(a)(iv) The GPU EIR concluded this impact to be less than significant. The project is not located in a Landslide Susceptibility Area 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.

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

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

- 7(c) The GPU EIR concluded this impact to be less than significant. As indicated in response (a)(iv), the site is not located within a "Landslide Susceptibility Area" as identified in the County Guidelines for Determining Significance for Geologic Hazards and is considered to be Generally Susceptible. The western portion of the project site, where Parcels 1 through 3 would be developed, is relatively flat. The slopes on Parcel 4 at the southeast corner of the project site have a moderate slope. In order to ensure that any proposed buildings are adequately supported, a Soils Engineering Report is required as part of the grading and building permit process. This report will 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, impacts would be less than significant.

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

7(d) The GPU EIR determined impacts from expansive soils to be less than significant. The project is underlain by expansive soils. The project would be required to submit a Soils Engineering Report by a California Certified Engineering Geologist prior to grading. The soils report is required to include a surficial stability analysis with design recommendations. All geotechnical recommendations provided in the soils report would be followed during grading and construction of the project.

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 conventional leach lines or supplement treatment systems, which would require approval by the County Department of Environmental Health and Quality (DEHQ) prior to the issuance of building permits for residential structures. 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.

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

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

## Discussion

A CAP Consistency Checklist was prepared for the project. The following responses have incorporated the information from the checklist.

- 8(a) The GPU EIR concluded this impact to be less than significant with mitigation. Amendments to Section 15064.4 of the CEQA Guidelines were adopted to assist lead agencies in determining the significance of the impacts of GHG emissions. Section 15064.4 specifies that a lead agency “shall 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 also provides lead agencies with the discretion to determine whether to assess those emissions quantitatively or to rely on a qualitative analysis or performance-based standards.

Per CEQA Guidelines Section 15064(h)(3), a project’s incremental contribution to a cumulative impact can be found not cumulatively considerable if the project would comply with an approved plan or mitigation program that provides specific requirements that would avoid or substantially lessen the cumulative problem in the geographic area of the project. To qualify, such plans or programs must be specified in law or adopted by the public agency with jurisdiction over the affected resources through a public review process to implement, interpret, or make specific the law enforced or administered by the public agency. Examples of such programs include a “water quality control plan, air quality attainment or maintenance plan, integrated waste management plan, habitat conservation plan, natural community conservation plans [and] plans or regulations for the reduction of GHG emissions.” Therefore, a lead agency can make a finding of “less than significant” for GHG emissions if a project complies with adopted programs, plans, policies, and/or other regulatory strategies to reduce GHG emissions.

The County of San Diego has developed a Climate Action Plan (CAP) to implement climate actions that reduce GHG emissions and establish actions to achieve a goal of net zero carbon emissions by 2045. The CAP establishes emission reduction targets of 43.6 percent emissions reductions below 2019 levels by 2030 and 85.4 percent below 2019 levels by 2045. This CAP sets GHG reduction targets and a net zero goal in alignment with the 2022 Scoping Plan. The CAP’s attainment of the County’s GHG reduction targets is the result of (1) several initiatives to be directly implemented by the County and (2) incorporating GHG-reduction features into the construction and operation of development projects (including County-initiated and privately initiated projects).

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

Step 1 of the Checklist assesses a project’s consistency with the growth projections used in the CAP to estimate future GHG emissions from activities occurring in the unincorporated area and County facilities and operations. Because the CAP uses growth projections based on implementation of the adopted General Plan, the first step in determining a project’s consistency with the CAP is to demonstrate its consistency with the regional categories and land use designations of the General Plan. All projects must demonstrate consistency with existing General Plan regional categories, land use designations, and the uses and development density and intensity allowed under the Zoning Ordinance.

If a project is consistent with the General Plan, then Step 2 of the Checklist should be completed. If a project is not consistent with the regional categories or land use designations of the General Plan, then it shall not use the CAP Consistency Checklist for CEQA streamlining.

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

Projects that are consistent with the CAP, as determined using Steps 1 and 2 in this Checklist, may rely on the CAP for the cumulative impacts analysis of GHG emissions under CEQA. Projects that are not consistent with the CAP as determined by Steps 1 or 2 of the Checklist, shall not use the CAP Consistency Checklist for CEQA streamlining.

As previously described, the proposed TPM for four single-family lots and one remainder parcel would be consistent with the General Plan Semi-Rural Regional Category, Semi-Rural 1 (SR-1) land use designation for the site. Therefore, the project may rely on the CAP for the cumulative impacts analysis of GHG emissions under CEQA.

As described in the CAP Consistency Review Checklist and required by County laws and regulations, the project would implement the following design features (included as conditions of approval by the County):

1. Low-flow plumbing fixtures, in compliance with CALGreen, which requires a 20 percent increase in indoor water use efficiency and use of indoor water-efficient irrigation systems.
2. Incorporation of Title 24 energy standards.
3. Comply with the County's Water Conservation in Landscaping Ordinance with automatically controlled efficient system and use of native plant species and non-invasive drought tolerant/low water use plants in landscaping plans.
4. Comply with County Ordinance Section 68.511 through 68.520 (Diversion of Construction and Demolition Materials from Landfill Disposal), which requires recycling of 90 percent of inert and 65 percent of all other materials from construction projects.
5. Comply with the County's Strategic Plan to Reduce Waste (2017) through the support of commercial composting programs to reduce organic waste and comply with established waste diversion requirements.
6. Comply with the County's Grading Ordinance and SDAPCD's fugitive dust rules outlined in Section 87.426 of the County's Grading Ordinance.
7. Utilize architectural coatings compliant with SDAPCD Rule 67.
8. Comply with most recent CALGreen Section A4.601.5, Tier 2 for energy efficiency.
9. Achieve Tier 2 status as set forth in the most recent CALGreen, Title 24, Part 11, Appendix A4 Residential Voluntary Measures, Division A4.6, Tier 2, including EV charging infrastructure in the garages, water-efficient landscaping and fixtures, and diversion of construction waste in compliance with Tier 2 standards.
10. Plant at least two trees per new residential unit (6 trees total).
11. The project would not result in any wasteful, inefficient, or unnecessary energy usage (see Section VI above).

12. Achieve compliance with EV requirements in the most recently adopted version of CALGreen by pr-plumbing garages to accommodate EV charging.
13. The project would have a less-than-significant transportation impact (see Section 17 below).

The measures above are also consistent with County General Plan mitigation measures CC-1.1, CC-1.11, CC-1.17, which encourage incentives for energy efficient development, implementation of the Ordinance Relating to Water Conservation for Landscaping, and implementation of a construction waste recycling program.

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

- 8(b) The GPU EIR concluded this impact to be less than significant. As described above, the project would not result in a cumulatively considerable contribution to global climate change with implementation of GPU mitigation measures CC-1.1, CC-1.11, CC-1.17, which encourage incentives for energy efficient development, implementation of the Ordinance Relating to Water Conservation for Landscaping, and implementation of a construction waste recycling program. As such, the project would be consistent with County goals and policies included in the County General Plan that address GHG reductions.

The project is consistent with the County's General Plan land use designation of Semi-Rural (SR-1) Residential. Through its goals, policies, and land use designations, the County's General Plan aims to reduce countywide GHG emissions. The project would result in a less than significant impact related to transportation. Therefore, the project would not conflict with SANDAG's recently adopted San Diego Forward: the 2021 Regional Plan, which includes a Sustainable Communities Strategy (SCS) as required by SB 375. Because the project's proposed land uses are consistent with the County's General Plan land use designation, the project would not conflict with the General Plan or SANDAG's Regional Plan and would not result in growth beyond what was assumed in the regional growth forecasts. Therefore, the project's impacts related to GHG emissions would be less than significant.

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

## **Conclusion**

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

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

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

<b>Significant Project Impact</b>	<b>Impact not identified by GPU EIR</b>	<b>Substantial New Information</b>
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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?  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 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  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

transmitting significant public health diseases or nuisances?

## Discussion

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

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

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

As previously discussed, the GPU EIR determined impacts from transport, use and disposal of hazardous materials and accidental release of hazardous materials to be less than significant. The proposed project would have a less-than-significant impact for the reasons detailed above. Thus, the project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 9(b) The GPU EIR concluded this impact to be less than significant. The project is not located within 0.25-mile of an existing or proposed school. The closest school is Dehesa Elementary approximately 0.7 miles from the project site. The project does not propose any hazardous emissions or handling of hazardous or acutely hazardous materials or substances. Furthermore, the project is required to comply with applicable regulations pertaining to hazardous waste to ensure that impacts related to hazardous emissions and schools is less than significant.

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

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

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

- 9(d) The GPU EIR concluded this impact to be less than significant with mitigation. The project is not located within an Airport Land Use Compatibility Plan (ALUCP), an Airport Influence Area, or a Federal Aviation Administration Height Notification Surface. The project is not located within 2 miles of an airport. 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. Therefore, the project would not constitute a safety hazard for people residing or working in the project area.

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

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

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

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

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

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

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

- 9f)(v) DAM EVACUATION PLAN:

The project is not located within a dam inundation zone. Additionally, the development would not constitute a "Unique Institution" such as a hospital, school, or retirement home pursuant to the Office of Emergency Services included within the County Guidelines for Determining Significance, Emergency Response Plans. Therefore, the proposed 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 provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

9(g) The GPU EIR concluded this impact as significant and unavoidable. The project is within the State Responsibility Area (SRA) and within a Very High Fire Hazard Severity Zone (FHSZ). However, the project would not expose people or structures to a significant risk of loss, injury or death involving wildland fires because the project would comply with the regulations relating to emergency access, water supply, and defensible space specified in the Consolidated Fire Code for the 16 Fire Protection Districts in San Diego County including:

- All driveways will have a minimum sixteen (16') foot wide improved paved driving surface capable of supporting the minimum imposed load of a 75,000 lb. fire apparatus
- Installation of two additional on-site fire hydrants
- Installation of automatic fire sprinkler systems
- Use of Ignition Resistant Building Construction Standards for Wildland-Urban Interface Areas.
- Defensible space and fuel modification zones measuring 100 feet in depth

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 allow water to stand for a period of 72 hours (3 days) or more (e.g., artificial lakes, agricultural irrigation ponds). Also, the project does not involve or support uses that would produce or collect animal waste, such as equestrian facilities, agricultural operations (e.g., chicken coops, dairies etc.), solid waste facilities or other similar uses. Therefore, the project would not substantially increase 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 also have a less-than-significant impact. Therefore, the project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

**Conclusion**

With regards to the issue area of 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.

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

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

**Discussion**

The following is based on the CEQA Level Drainage Report Walsh Engineering and Surveying, dated April 2025 and a Priority Development Plan (PDP) Stormwater Quality Management Plan (SQMP) prepared for the project.

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 but not limited to: hydraulic stabilization hydroseeding and Bonded Fiber Matrix or Stabilized Fiber Matrix on disturbed slopes; County Standard lot perimeter protection detail and mulch, straw, woodchips and soil application for erosion control on disturbed flat areas; energy dissipater outlet protection for water velocity control; silt fencing, and gravel and sand bags for sediment control; stabilized construction entrance, for the prevention of 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. 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 on water quality standards through ordinance compliance as detailed above, the project would be consistent with the analysis within the GPU EIR because it would not create new impacts, increase impacts, and there is no new information of substantial importance than identified within the GPU EIR.

- 10(b) The GPU EIR concluded this impact to be significant and unavoidable. The project site lies in the Dehesa (909.23) hydrologic sub-area within the Sweetwater hydrologic unit. According to the Clean Water Act section 303(d) list, the Sweetwater River is impaired for coliform bacteria, trace metals, and low dissolved oxygen (nutrients). The project could contribute to release of these pollutants; however, the project would comply with the WPO and implement site design measures and source control BMPs to prevent a significant increase of pollutants to receiving waters.

As previously discussed, the GPU EIR determined significant and unavoidable impacts to water quality standards and requirements. However, the project would have a less than significant impact on water quality standards and requirements with implementation of the BMPs described in the project-specific SWQMP, consistent with GPU EIR mitigation measures (Hyd-1.2 through Hyd-1.5) Therefore, the project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 10(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 Padre Dam Municipal Water District that obtains water from imported sources. The project would not use groundwater for its potable water supply. The project would incrementally increase demand for potable water and non-potable water for irrigation. Given that Water Management Plans use projections in local planning

documents and that the project is consistent with the County General Plan land use designation and zoning, potable water demands of project would be similar to those accounted for in Padre Dam Municipal Water District's 2020 Urban Water Management Plan and 2020 Water Shortage Contingency Plan. Consequently, significant impacts to groundwater resources are not anticipated with development of the project. In addition, the project does not involve operations that would interfere substantially with groundwater recharge. 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. However, the project would have a less-than-significant impact on groundwater recharge. Therefore, the project would not be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 10(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 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 and mulch, straw, woodchips and soil application for erosion control on disturbed flat areas; energy dissipater outlet protection for water velocity control; silt fencing, and gravel and sand bags for sediment control; stabilized construction entrance, for the prevention of 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 May 28, 2022, 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.

Under preconstruction conditions, drainage, the northern half of the site drains to the east towards Harbison Canyon Road. The southern half drains southerly to the property line. The development of the project site would not substantially modify the onsite drainage patterns. Post construction drainage would maintain the same drainage patterns as the pre-developed condition. The increase in flow rate for the post developed condition would be reduced by the use of tree wells with a 4 inch of flood storage ponding for detention and pollutant control on each. Therefore, the project would not result in substantial erosion or siltation on- or off-site.

As previously discussed, the GPU EIR determined significant and unavoidable impacts on 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 CEQA Level Drainage Study for Harbison Canyon TPM prepared by Walsh Engineering and Surveying determined that the project would not alter the existing drainage pattern in a manner that would result in flooding on- or off-site.

Under the existing conditions of the project site, there are three drainage basins. One basin drains to the east towards Harbison Canyon Road and the other two drain southerly to the property line. The development of the project site would not substantially modify the onsite drainage patterns. Post construction drainage would maintain the same drainage patterns as the pre-developed condition. The increase in flow rate for the post developed condition would be reduced by the use of tree wells with a 4 inch of flood storage ponding for detention on each.

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 CEQA Level Drainage Study for Harbison Canyon TPM prepared by Walsh Engineering and Surveying, and as described above in 10(e) and 10(f), the proposed project would maintain the existing pre-development on-site drainage pattern. Post development drainage would be at or below pre-development rates of discharge.

As previously discussed, the GPU EIR determined impacts to exceed capacity of stormwater systems as less than significant with mitigation. With mitigation, the 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 determined impacts to water quality standards and requirements as significant and unavoidable. However, the project would have a less-than-significant impact on 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 Federal Emergency Management Agency (FEMA) or County-mapped floodplains were identified on the project site. The project site is identified by FEMA as an “Area of Minimal Flood Hazard.”

As previously discussed, the GPU EIR determined impacts from housing within a 100-year flood hazard area as less than significant with mitigation. The project would have a less-than-significant impact for the reasons detailed above. Therefore, the project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 10(j) The GPU EIR concluded this impact to be less than significant with mitigation. No FEMA or County-mapped floodplains were identified on the project site. The project site is identified by FEMA as an “Area of Minimal Flood Hazard.” Additionally, no habitable structures are proposed as part of the project. Therefore, 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. The project would have a less-than-significant impact for the reasons detailed above. Therefore, the project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

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

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

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

- 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 Section 7(a)(iv).

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

**Conclusion**

With regards to the issue area of 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, require the project applicant to comply 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.

<b>Significant Project Impact</b>	<b>Impact not identified by GPU EIR</b>	<b>Substantial New Information</b>
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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 include the introduction of new infrastructure such as major roadways, water supply systems, or utilities to the area. The project is minor subdivision that would divide a 12.37-acre parcel lot into four lots with one remainder parcel, which is consistent with the County Zoning Ordinance Land Use Regulation and density established under the

County of San Diego General Plan. Therefore, the project does not propose any development which would be expected to divide the surrounding established community

As previously discussed, the GPU EIR concluded impacts related to 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 that would subdivide a 12.37-acre property into four lots with one 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.

<b>Significant Project Impact</b>	<b>Impact not identified by GPU EIR</b>	<b>Substantial New Information</b>
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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 being within an area of “Areas Underlain by Mineral Deposits” (MRZ-2). However, the project site has no alluvium or mines and is surrounded by residential 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 located in an MRZ-2 zone. 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.

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

- |  |                          |                          |                          |
|--|--------------------------|--------------------------|--------------------------|
| 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?

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

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

**Discussion**

The following is based on a Noise Study was prepared by Ldn Consulting dated November 2023 for the project.

13(a) The GPU EIR concluded this impact to be less than significant with mitigation. The area surrounding the site contains single-family residential with retail uses across Harbison Canyon Road to the east. The project would not expose people to potentially significant noise levels that exceed the allowable limits of the General Plan, Noise Ordinance, or other applicable standards for the 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 adjacent to Harbison Canyon Road, which is within a noise contour that may exceed 60 dB(A).

Noise levels from future traffic traveling on Harbison Canyon Road were evaluated. The worst-case first floor 60 dBA CNEL contour extends approximately 105 feet from the centerline of Harbison Canyon Road. The second floor 60 dBA CNEL contour extends approximately 152 feet from the centerline of Harbison Canyon Road. The contours show that noise sensitive land use (NSLU) areas would not exceed the County of San Diego 60 dBA CNEL exterior noise standard. Additionally, all building façades at the single-family dwellings would comply with the General Plan Noise Element Standard, of 60 dBA CNEL, therefore, an interior noise study is not required. Therefore, future traffic noise levels would not expose existing, foreseeable future, and planned noise sensitive receptors to noise levels that exceed the noise standards.

In addition, off-site direct and cumulative noise impacts to off-site residences were also evaluated and determined that project related traffic on nearby roadways would not have a direct noise impact of 3 dBA or more and would not have a significant contribution to the cumulative noise in the area. Direct and cumulative noise impacts to off-site existing residences are not anticipated.

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 and surrounding area are zoned General Agriculture and

Commercial Office that has a one-hour average sound limit of 50 dBA daytime and 45 dBA nighttime and 60 dBA daytime and 55 dBA nighttime respectively. Project operation does not involve any noise producing equipment that would exceed applicable noise levels at the adjoining property line.

Noise Ordinance – Section 36-410: Temporary construction noise is subject to the County's 75 dBA eight-hour average requirement at the boundary of any occupied property, specifically an existing residence. It is not anticipated that the project would operate construction equipment in excess of an average sound level of 75 dB between the hours of 7 AM and 7 PM. The project would not generate construction noise in excess of Noise Ordinance standards. Construction operations would occur only during permitted hours of operation. In addition, the following BMPs would be adhered to whenever possible:

- Turn off equipment when not in use.
- Equipment used in construction should be maintained in proper operating condition, and all loads should be properly secured, to prevent rattling and banging.
- Use equipment with effective mufflers.
- Minimize the use of backup alarms.
- Equipment staging areas should be placed at locations away from noise-sensitive (occupied) receivers.

As previously discussed, the GPU EIR determined impacts from excessive noise levels to be less than significant with mitigation. The project would have a less-than-significant impact with the incorporation of BMPs. Therefore, the project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 13(b) The GPU EIR concluded this impact to be less than significant with mitigation. The project proposes single-family residential uses, which is sensitive to low ambient vibration. The project does not propose any blasting or rock crushing during the grading operations. In addition, project operation does not involve any vibration producing equipment that would exceed applicable vibration levels at the adjoining property line. In addition, residences would be setback more than 200 feet from any Right-of-Way. A setback of 200 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).

As previously discussed, the GPU EIR determined impacts from excessive groundborne vibration to be less than significant with mitigation. However, the project would have a less than significant impact with no required mitigation for the reasons detailed above. Therefore, the project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 13(c) 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 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. Therefore, the project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

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

**Conclusion**

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

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

<b>Significant Project Impact</b>	<b>Impact not identified by GPU EIR</b>	<b>Substantial New Information</b>
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**14. Population and Housing – Would the Project:**

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

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

**Discussion**

14(a) The GPU EIR concluded this impact to be less than significant. The project proposes The GPU EIR concluded this impact to be less than significant. The project site is designated in the General Plan as Semi Rural Residential (SR-1). The project is consistent with the density allowable under the general plan and thus 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 project would have a less-than-significant impact for the reasons detailed above, the project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

14(b) The GPU EIR concluded this impact to be less than significant. The GPU EIR concluded this impact to be less than significant. The project would not displace existing housing. The project would subdivide a 12.37-acre parcel into four lots with one remainder parcel. The two existing single-family residences would remain. As such, replacement housing would not be required elsewhere.

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

14(c) The GPU EIR concluded this impact to be less than significant. The project would not displace substantial numbers of people. The project would subdivide a 12.37-acre parcel into four lots with one remainder parcel. The two existing single-family residences would remain. Therefore, the project would create new single-family residential lots and would not displace substantial numbers of existing people, necessitating the construction of replacement housing elsewhere. Impacts would be less than significant.

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

**Conclusion**

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

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

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

<b>Significant Project Impact</b>	<b>Impact not identified by GPU EIR</b>	<b>Substantial New Information</b>
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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 except for school services, which remained significant and unavoidable.

The project site is in the sphere of influence and boundaries of the San Diego County Fire Protection District. The closest paid-staff District facility is Fire Station 24 in Harbison Canyon located at 551 Harbison Canyon Road. This station is staffed twenty-four (24) hours per day with career firefighters and is located approximately 2.8 miles from the project site. According to the project availability form, the estimated response time from Fire Station 24 is 4.39 minutes. Travel Time Standards, from the County of San Diego General Plan’s Safety Element indicates that a maximum response time of ten (10) minutes is allowed for Single Family Dwellings in Land Use Designations SR-1, Semi-Rural Residential Areas. The San Diego County Fire Protection District has adequate capacity to serve this project.

The County of San Diego Sherrif Department provides law enforcement services to the project site. The closest Sherrif Station is located at 2751 Alpine Boulevard approximately 6.15 miles to the west. The project is consistent with the density allowable under the general plan and thus would not induce substantial unplanned population growth in the area as development of the site was accounted for within the GPU. Therefore, the project would not result in the need for new or physically altered police protection facilities, and impacts would be less than significant.

Students living within this community would attend schools in the Cajon Valley Union School District (CVUSD). All applicable school fees to the Cajon Valley Union District would be required to be paid prior to the issuance of a building permit for each individual residence. The project’s effect on public parks is discussed in response 16(a) and response 16(b).

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

**Conclusion**

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

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

<b>Significant Project Impact</b>	<b>Impact not identified by GPU EIR</b>	<b>Substantial New Information</b>
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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 accommodate population growth that is already anticipated within the GPU. Furthermore, the project would be required to comply with the County’s Park Land Dedication Ordinance (PLDO). The PLDO is the mechanism that enables the funding or dedication of local parkland in the County. To avoid any physical deterioration of local recreation facilities, the project would be required to pay park fees prior to building permit issuance.

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

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

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

**Conclusion**

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

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

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

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

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

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

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

**Discussion**

17(a) The GPU EIR concluded this impact to be significant and unavoidable. The project would create four single-family lots and would not generate more than 110 average daily trips. The project would not create a conflict with any performance measures because with the addition of project trips, the circulation system does not degrade to below standards established in the GPU EIR. Surrounding intersection and roadway segment operations will remain at acceptable levels of service (LOS) with construction of the project and is considered to have a less than significant impact. An objective of the GPU is to plan for growth while preserving the County’s environmental, cultural, and historical resources. The project would not result in a substantial increase in the number of vehicle trips as it would only generate 40 daily trips at build-out, volume of capacity ratio on roads, or congestion at intersections in relation to existing conditions.

There are no public transit facilities in the project vicinity. Additionally, there are no pedestrian or bicycle facilities on Harbison Canyon Road. Therefore, the project would not result in a conflict with transit, pedestrian, or bicycle facilities.

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

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

General Plan Policy M-2.1 sets forth the requirements for LOS. Policy M-2.1 requires development projects to provide associated road improvements necessary to achieve a LOS D or higher on all Mobility Element roads except for those where a failing LOS has

been accepted by the County pursuant to the criteria specifically identified in the General Plan. When development is proposed on roads where a failing LOS has been accepted, require feasible mitigation in the form of road improvements or a fair share contribution to a road improvement program, consistent with the Mobility Element road network.

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

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

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

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

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

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

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

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

As previously discussed, the GPU EIR concluded this impact to be significant and unavoidable. As the project would not conflict with an applicable congestion management program with payment into the TIF program, the project would be consistent with the analysis in the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance other than the information identified in the GPU EIR.

17(c) The GPU EIR concluded this impact to be less than significant with mitigation. The project site is not located within an Airport Influence Area, Airport Safety Zone, ALUCP Area, Aviation Easement, or Overflight Area. Therefore, the project would have no impact on 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 proposed private driveway onto Harbison Canyon Road would meet County design standards and provide adequate sight distance.

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

17(e) The GPU EIR concluded this impact to be less than significant with mitigation. The proposed project would not result in inadequate emergency access. The private, to-be-named road has a proposed maximum length between Harbison Canyon Road and the cul-de-sac bulb entrance that measures 970 feet. The road would have a 40-foot-wide easement and a paved improved width of 24 feet. All driveways would have a minimum

16-foot-wide improved paved driving surface capable of supporting the minimum imposed load of a 75,000-pound fire apparatus.

As previously discussed, the GPU EIR determined impacts on emergency access as less than significant with mitigation. As the project would have a less-than-significant impact 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. The project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

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

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

**Conclusion**

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

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

**18. Tribal Cultural Resources** – Would the Project:

<b>Significant Project Impact</b>	<b>Impact not identified by GPU EIR</b>	<b>Substantial New Information</b>
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- a) Cause a substantial adverse change in the significance of a tribal cultural resource, as defined in Public Resources Code §21074 as either a site, feature, place, or cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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- i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of Historical Resources as defined in Public Resources Code §5020.1(k), or
  
- ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code §5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code §5024.1, the Lead Agency shall consider the significance of the resource to a California Native American tribe.

**Discussion**

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

18(a) As described in Section 5(b), a dedicated open space easement would be granted to the County of San Diego over a portion of Parcel 4, consistent with GPU Mitigation Measure Cul-2.3, for the protection of archaeological site CA-SDI- 23515 and would prohibit ground disturbance on any portion of the land subject to said easement. As a precautionary measure for any inadvertent discoveries and consistent with General Plan EIR Mitigation Measures Cul-2.5 and Cul-4.1, the project will still be conditioned to include Archaeological and Tribal Monitoring, as well as a Cultural Resources Treatment Agreement and Preservation Plan throughout all grading activities. Potential impacts to Tribal cultural resources will be mitigated through ordinance compliance and through implementation of the following mitigation measures: grading monitoring under the supervision of a County-approved archaeologist and a Kumeyaay Native American monitor and conformance with the County’s Cultural Resource Guidelines if resources are encountered. The GPU EIR identified these mitigation measures as Cul 2.5. The project would be conditioned with archaeological monitoring (Cul-2.5), as described in Section 5.

Consistent with General Plan EIR Mitigation Measures Cul 2.2, Cul-2.4, Cul-2.6, and Cul-4.1 and General Plan Policy-11.4 – Collaboration with Agencies and Jurisdictions, the County initiated coordination with California Native American tribes traditionally and culturally affiliated with the project site on August 22, 2025. Staff received general questions regarding the project. On August 22, 2025, the Campo Band of Mission Indians requested further coordination regarding the project. As of March 9, 2026, the most current study and draft conditions have been provided to the Campo Band of Mission Indians. No Tribal Cultural Resources outside of the previously discussed area to be protected archaeological site CA-SDI-23515 have been identified during discussions and coordination with the tribes.

As previously stated, impacts to Tribal Cultural Resources that were analyzed within the GPU EIR within Section 2.5, Cultural and Paleontological Resources were determined to be significant with mitigation. The project would implement measures consistent with the GPU EIR. Therefore, the project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

**Conclusion**

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

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

<b>Significant Project Impact</b>	<b>Impact not identified by GPU EIR</b>	<b>Substantial New Information</b>
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**19. 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?
- g) Comply with federal, state, and local statutes and regulations related to solid waste?

**Discussion**

19(a) The GPU EIR concluded this impact to be less than significant with mitigation. The project proposes to discharge domestic waste to on-site wastewater systems (OSWS), also known as septic systems. Discharged wastewater must conform to the Regional Water Quality Control Board's (RWQCB) applicable standards, including the Regional Basin Plan and the California Water Code. California Water Code Section 13282 allows RWQCBs to authorize a local public agency to issue permits for OSWS "to ensure that systems are adequately designed, located, sized, spaced, constructed and maintained." The RWQCBs with jurisdiction over San Diego County have authorized the County of San Diego, Department of Environmental Health and Quality (DEHQ) to issue certain OSWS permits throughout the County and within the incorporated cities. The Project would require DEHQ approval of the OSWS lay-out for the Project pursuant to DEHQ, Land and Water Quality Division's, "Onsite Wastewater Systems: Permitting Process and Design Criteria" prior to obtaining a building permit for residential development. Therefore, the Project would be consistent with the wastewater treatment requirements of the RWQCB as determined by the authorized, local public agency.

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

19(b) The GPU EIR concluded this impact to be less than significant with mitigation. The project requires water service from the Padre Dam Municipal Water District. The project is consistent with the density allowable under the general plan and thus would have been accounted for in Padre Dam's Urban Water Management Plan. In addition, the project would utilize on-site wastewater treatment systems and therefore would not rely on any public wastewater facilities. 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.

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

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

19(d) The GPU EIR concluded this impact to be significant and unavoidable. The project would receive water from the Padre Dam Municipal Water District. The project is consistent with the density allowable under the general plan and thus would have been accounted for in Padre Dam's Urban Water Management Plan. 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.

19(e) The GPU EIR concluded this impact to be less than significant with mitigation. The project would utilize on-site wastewater treatment systems and therefore would not rely on any public wastewater facilities. 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.

19(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.

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

### **Conclusion**

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

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

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

- |  |                          |                          |                          |
|--|--------------------------|--------------------------|--------------------------|
| a) Substantially impair an adopted emergency response plan or emergency evacuation plan?   | <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? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| d) Expose people or structures to significant risk, including downslopes or downstream flooding or landslides, as a result of runoff, post-fire instability, or drainage changes?  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

**Discussion**

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

The following is based on a Fire Protection Plan that was prepared by J Charles Webber Fire and Life Safety Consultant dated May 2024 for the project.

20(a) The GPU EIR concluded this impact to be significant and unavoidable. The site is located within a SRA. The project site is within the authority of the San Diego County Fire Protection District and is located approximately 2.8 miles from Fire Station 24 located at 551 Harbison Canyon Road. This station is staffed 24 hours per day with career firefighters. The expected emergency travel time to the project site would be 4.7 minutes. Therefore, the project would meet the required travel response time of 5 minutes. Access would be provided by the proposed private driveway along Harbison Canyon Road.

A Fire Protection Plan (FPP) was prepared for the project by J Charles Webber Fire and Life Safety Consultant. dated May 2024. The FPP considered the property location, topography, geology, combustible vegetation (fuel types), climatic conditions and fire history as part of the assessment. It considers water supply, access, structure ignitability and fire resistive building materials, fire protection systems and equipment, impacts to existing emergency services, defensible space and vegetation management. Additionally, the FPP analyzed existing fire protection measures within the vicinity of the project site

and discussed measures to be undertaken by the proposed project for the purpose of fire protection.

The private, to-be-named road has a proposed maximum length between Harbison Canyon Road and the cul-de-sac bulb entrance that measures 970 feet. The road would have a 40-foot-wide easement and a paved improved width of 24 feet. All driveways would have a minimum 16-foot-wide improved paved driving surface capable of supporting the minimum imposed load of a 75,000 lb. fire apparatus.

As previously stated, Wildfire was analyzed within the GPU EIR within Section 2.7, Hazards and Hazardous Materials, and was determined to be significant and unavoidable. However, the proposed project would have a less-than-significant impact for the reasons detailed above. Therefore, the project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

20(b) The GPU EIR concluded this impact to be significant and unavoidable. The project is within a State Responsibility Area Very High 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 including:

- All driveways will have a minimum sixteen (16') foot wide improved paved driving surface capable of supporting the minimum imposed load of a 75,000 lb. fire apparatus
- Installation of two additional on-site fire hydrants
- Installation of automatic fire sprinkler systems
- Use of Ignition Resistant Building Construction Standards for Wildland-Urban Interface Areas.
- Defensible space and fuel modification zones measuring 100 feet in depth

Implementation of these fire safety standards would occur during the building permit process and is consistent with GPU EIR mitigation measures Haz-4.2 and Haz-4.3. In addition, the project is consistent with the Zoning Ordinance and the allowable development density established under the GPU. Therefore, for the reasons stated above, the project would not be expected to experience exacerbated wildfire risks due to slope, prevailing, winds or other factors.

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

20(c) The GPU EIR concluded this impact to be significant and unavoidable. The project would require the installation and maintenance of new private driveways for the residential lots. The project also requires utility connections for service from the Padre Dam Municipal Water District. These proposed improvements would not exacerbate fire risk. 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 provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 20(d) The GPU EIR concluded this impact to be significant and unavoidable. As previously stated in Section 20(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 project site is not within a landslide susceptibility category as identified by the California Department of Conservation or in the County Guidelines for Determining Significance for Geologic Hazards. In order to ensure that any proposed buildings are adequately supported, a Soils Engineering Report is required as part of the grading and building permit process. This report will 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. 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 increase impacts identified within the GPU EIR.

## **Conclusion**

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

5. No peculiar impacts to the project or its site have been identified.
6. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
7. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
8. Feasible mitigation measures contained within the GPU EIR (Haz-4.2 and Haz-4.3) would be applied to the project. These mitigation measures, as detailed above, require the project applicant to implement brush management and comply with the building and fire codes.

## **Appendices**

Appendix A – Technical Studies and References

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

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

## Appendix A

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

**Project Specific Studies and References:**

Agricultural Resources Review Memo. County of San Diego. October 2022

Air Quality Assessment. Ldn Consulting, Inc. November 2024

Biological Resources Letter Report. Vince Scheidt Inc. June 2025

Climate Action Plan (CAP) Checklist

Cultural Resources Inventory for the Harbison Canyon TPM Project. Laguna Mountain Environmental, Inc. May 2024

CEQA Drainage Study. Walsh Engineering and Surveying INC.

Fire Protection Plan. J Charles Weber Fire and Life Safety Consultant. May 2024

Greenhouse Gas Screening Letter. Ldn Consulting Inc. November 2024.

Noise Assessment. Ldn Consulting Inc. November 2023

Stormwater Quality Management Plan (SWQMP). Walsh Engineering and Surveying INC.

Compiled Service Availability Forms (399F, 399Sc, 399W), 2022

**References**

For a complete list of technical studies, references, and significance guidelines used to support the analysis of the GPU 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)

California Air Resources Board (CARB). 2017. California's 2017 Climate Change Scoping Plan. December 14, 2017. [https://ww3.arb.ca.gov/cc/scopingplan/scoping\\_plan\\_2017.pdf](https://ww3.arb.ca.gov/cc/scopingplan/scoping_plan_2017.pdf).

Office of Environmental Health Hazard Assessment (OEHHA). 2015. Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments. Available at: <https://oehha.ca.gov/air/crnrr/notice-adoption-air-toxics-hot-spots-program-guidance-manual-preparation-health-risk-0>.

## Appendix B

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

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

## Appendix C

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

[https://www.sandiegocounty.gov/content/dam/sdc/dplu/docs/Traffic\\_Guidelines.pdf](https://www.sandiegocounty.gov/content/dam/sdc/dplu/docs/Traffic_Guidelines.pdf)

<https://www.sandiegocounty.gov/content/sdc/pds/procguid.html#transportation>