

April 14, 2025

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

Project Name: Oro Verde Parcel Map
Project Record Numbers: PDS2022-TPM-21323
Environmental Log Number: PDS2022-ER-22-08-006

APN(s): 241-140-02-00

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:

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619-323-8090

Project Location:

The project site is located at 2000 Oro Verde Road in the North County Metro Community Planning area, within unincorporated San Diego County.

Project Applicant Name and Address:

Wohlford Land Co LLC, PO Box 5005 #17, Rancho Santa Fe, CA 92067

General Plan

Community Plan:	North County Metro
Regional Categories:	Village
Land Use Designations:	Village Residential (VR-7.3)
Density:	7.3 units per acre
Floor Area Ratio (FAR)	0.5

Zoning

Use Regulation:	Single Family Residential (RS)
Minimum Lot Size:	5.33 acres
Special Area Regulation:	C

Description of Project:

The project is a Tentative Parcel Map (TPM) to subdivide one lot into two residential lots. The project consists of one legal lot totaling approximately 51.2 acres. The project site is located at 2000 Oro Verde Road in the North County Metro Community Planning area, within unincorporated San Diego County. The site is subject to the General Plan Regional Category Semi-Rural, Land Use Designation Semi-Rural Residential (SR-2). Zoning for the site is Limited Agricultural (A70). The site is developed with an existing agricultural grove that would be retained. Access to Parcel 1 is provided by a private driveway off Vista

Lucia, a private road. Access to Parcel 2 is provided by an access easement off the same private driveway that provides access to Parcel 1. The project would be served by on-site septic systems and imported water from the Rincon Del Diablo Municipal Water District. No extension of water utilities will be required by the project. No earthwork is proposed at this time.

Overview of 15183 Checklist

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

General Plan Update Program EIR

The County 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 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 SDCWA 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 Program EIR (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 (refer to

https://www.sandiegocounty.gov/content/dam/sdc/pds/gpupdate/docs/BOS_Aug2011/EIR/FEIR_7.00_-_Mitigation_Measures_2011.pdf).

A comprehensive environmental evaluation has been completed for the project as documented in the attached 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 General Plan, as analyzed by the Final GPU EIR (GPU 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 develop a 5.33-acre property with 37 detached multi-family residential units, 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 that are peculiar to the project or its site. The project site is in an area developed with single-family residential lots with associated accessory uses. The property does not support any peculiar environmental features, and the project would not result in any peculiar effects.

In addition, as explained further in the 15183 Exemption Checklist below, all project impacts were adequately analyzed in the GPU EIR. The project could result in potentially significant impacts to biological resources, cultural resources, hazards and hazardous materials, noise, and transportation and traffic. However, applicable mitigation measures specified in the GPU EIR have been made conditions of approval for this project.

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

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

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

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

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

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

Eddie Scott

Signature

7/24/2025

Date

Eddie Scott

Printed Name

Planning Manager

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

Discussion

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

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

As described in the GPU EIR (County of San Diego 2011), the County contains visual resources affording opportunities for scenic vistas in every community. Resource Conservation Areas (RCAs) are identified in 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 is located at 2000 Oro Verde Road in the Escondido Community Planning Area within unincorporated San Diego County. San Dieguito River-Lake Hodges is the closest RCA identified by the County General Plan. The project site is approximately 3 miles northeast of Lake Hodges and is not visible from this RCA due to the surrounding topography and intervening structures.

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

- 1(b) The GPU EIR concluded this impact to be less than significant with mitigation. State scenic highways refer to those highways that are officially designated by the California Department of

Transportation (Caltrans) as scenic (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 in the vicinity of a state-designated scenic highway, Highway 78. However, the site is not visible from the Highway and therefore would not have any impacts to scenic resources within a state scenic highway.

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

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

The majority of the properties surrounding the project site are developed with single family residential and agricultural uses. The visual character surrounding the project site is characterized by agricultural and rural residential land uses. The project would not detract from, or contrast with the existing visual character and/or quality of the surrounding areas because the project is the subdivision one 51.2-acre lot into two lots. The agricultural grove on the property will remain and the proposal does not include any changes to the existing landform. Therefore, 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. 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 in the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance other than the information identified in the GPU EIR.

- 1(d) The GPU EIR concluded this impact to be significant and unavoidable. The project is for the subdivision of one lot into two residential lots. The project would not adversely affect nighttime views or astronomical observations because the project would be required to conform to the County Light Pollution Code (Sections 51.201–51.209) to prevent spillover onto adjacent properties and minimize impacts to dark skies. Compliance with the Code would be required prior to 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. 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 in the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance other than the information identified in the GPU EIR.

Conclusion

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

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

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

Would the project:

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

☐☐☐

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

☐☐☐

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

☐☐☐

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

☐☐☐

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

☐☐☐

Discussion

2(a) The GPU EIR concluded this impact to be significant and unavoidable. The project site is currently used for agricultural purposes. However, the subdivision of the approximately 50-acre parcel into two parcels will not impact the existing agriculture on the property. The site is subject to the General Plan Regional Category Semi-Rural and the Land Use Designation is also Semi-Rural Residential (SR-2). Zoning for the site is Limited Agricultural (A70). The site is developed with an existing agricultural grove that would be retained. The proposed subdivision would allow the development of one additional single-family dwelling and potential accessory uses. However, this would not prevent the use of the site for continuing agricultural use. Most of the parcels to the east and south of the proposed parcel are smaller in size but still maintain the agricultural groves on their properties.

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

2(b) The GPU EIR concluded this impact to be less than significant with mitigation. Zoning for the site is Limited Agriculture (A70) and the project does not change the zoning. The site is developed

with an existing agricultural grove that would be retained. The site is adjacent to land under a Williamson Act Contract. However, the existing agricultural use on the site will remain on the property. The project will subdivide the land into two smaller parcels and it will not significantly impact the agriculture on-site or create any incompatible uses adjacent to the land under contract. Therefore, the project would not conflict with existing zoning for agricultural use or a Williamson Act Contract.

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

- 2(c) Forestry resources were not specifically analyzed under the GPU EIR because Appendix G of the CEQA Guidelines was amended to include significance criteria for forestry resources after the release of the Notice of Preparation for the GPU EIR. The project site does not contain any forest lands as defined in California Public Resources Code, Section 12220(g); therefore, project implementation would not result in the loss or conversion of forest land to a non-forest use. In addition, the County of San Diego does not have any existing Timberland Production Zones. Therefore, project implementation would not conflict with existing zoning for, or cause rezoning of, forest land, timberland, or Timberland Production Zones.

As previously discussed, forestry resources were not specifically analyzed under the GPU EIR because Appendix G of CEQA Guidelines was amended to include significance criteria for forestry resources after the release of the Notice of Preparation (NOP) for the GPU EIR. However, because the project would have a less than significant impact to forest resources for the reasons detailed above, the project would be consistent with the analysis in the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance other than the information identified in the GPU EIR.

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

- 2(e) The GPU EIR concluded this impact to be significant and unavoidable. As mentioned in Section 2(a), the project site would not result in any conversion of on-site agricultural resources to a non-agricultural use.

The applicant proposes a subdivision that is consistent with the surrounding area and would not impact the existing surrounding agricultural land uses. The project would not create a land use conflict with surrounding agricultural operations and would likely not result in the conversion of agricultural resources to a non-agricultural use. Therefore, the project would not result in indirect impacts to off-site agricultural resources.

As previously discussed, the GPU EIR determined impacts from direct and indirect conversion of agricultural resources (including forest resources) to be significant and unavoidable. The project would have less than significant impacts to agricultural resources. Therefore, the project would be consistent with the analysis in the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance other than the information identified in the GPU EIR.

Conclusion

With regard to the issue area of agricultural/forestry resources, the following findings can be made:

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

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

Discussion

- 3(a) The GPU EIR concluded this impact to be less than significant. San Diego County is currently designated as a non-attainment area for the federal standards for ozone (O₃) as well as the state standards for O₃, particulate matter less than or equal to 10 microns (PM₁₀), and particulate matter less than or equal to 2.5 microns (PM_{2.5}). The RAQS and the region's portion of the SIP are the region's plans for attainment and maintaining air quality standards. The RAQS and SIP rely on information from the California Air Resources Board (CARB) and San Diego Association of Governments (SANDAG), including projected growth, to project future emissions and determine from that the strategies necessary for the reduction of stationary source emissions through

regulatory controls. Projects that propose development that is consistent with the land use designations and growth anticipated by the local general plans and SANDAG are, by definition, consistent with the RAQS and SIP.

The project does not include any grading or construction. If any future grading is proposed, it 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. The project is consistent with the density established under the County General Plan and certified by the GPU EIR. Therefore, because the project would not increase the density or intensity of the land assumed in the GPU EIR and would not result in growth beyond that assumed in SANDAG's growth assumptions or in the General Plan projections, the project would not conflict with or obstruct implementation of the RAQS or SIP.

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

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

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

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

As previously discussed, the GPU EIR determined significant and unavoidable impacts to non-attainment criteria pollutants. However, the project does not include any grading or construction. Therefore, the project would be consistent with the analysis in the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance other than the information identified in the GPU EIR.

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

The project would not contribute PM₁₀, PM_{2.5}, NO_x, and VOC emissions from construction/grading activities; therefore, it would not exceed established SLTs (refer to Section 3(b)). 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 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.

The project would generate PM₁₀, PM_{2.5}, and NO_x emissions during project operations primarily from mobile sources (i.e., vehicle trips), and VOCs from area and mobile sources. However, as previously described, operational emissions of all pollutants would be below the County's recommended SLTs. 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.

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

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

- 3(d) The GPU EIR concluded this impact to be significant and unavoidable. Air quality regulators typically define sensitive receptors as schools (preschool–12th grade), hospitals, resident care facilities, daycare centers, residences, or other facilities that may house individuals with health conditions that would be adversely impacted by changes in air quality. The project includes the subdivision of 51.2 acres and would not generate construction emissions in the vicinity of sensitive receptors.

The project site is not located within 0.25 mile of any identified point source of significant emissions and is surrounded by residential homes and agriculture. Similarly, the project does not propose uses or activities that would result in exposure of these sensitive receptors to significant pollutant concentrations and would not place sensitive receptors near any CO hotspots.

As previously discussed, the GPU EIR determined significant and unavoidable impacts to sensitive receptors. The project would have a less than significant impact to sensitive receptors. Therefore, the project would be consistent with the analysis in the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance other than the information identified in the GPU EIR.

- 3(e) The GPU EIR concluded this impact to be less than significant. The project would not create objectionable odors affecting a substantial number of people.

Conclusion

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

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

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

Discussion

Potential impacts to biological resources resulting from the proposed project were analyzed in a Biological Resources Letter Report prepared by Dudek, dated June, 2023 (Appendix C). The following responses have incorporated the analysis from the report.

- 4(a) The GPU EIR concluded this impact to be significant and unavoidable. The site contains disturbed habitat, urban/developed land, and a non-vegetated, earthen-bottom, and concrete-lined channel that runs along the northeastern boundary of the project site. Special status plant species observed on the site include the San Diego County viguiera (*Bahiopsis laciniata*). Approximately 13 San Diego County viguiera individuals were observed surrounding the concrete and earthen portions of the channel in the northeastern corner of the project site. However, the project is designed to avoid impacts to the channel. Avoidance of the channel includes the banks of the channel where the approximately 13 San Diego County viguiera individuals occur. Project design features for avoidance of these sensitive resources would include temporary fencing during construction and permanent signage for operation of the project. Therefore, no direct impacts to

San Diego County viguiera would occur and no mitigation is required. No other sensitive plant species were observed on the project site, and no sensitive plant species were determined to have a high potential to occur on the project site.

Indirect impacts to sensitive plants would primarily result from adverse edge effects during construction of the project. Edge effects could include trampling; dust, which could disrupt plant vitality in the short term; construction-related pollutant discharges; soil erosion; and runoff. Standard best management practices (BMPs), including dust suppression measures, weeds and invasive species control measures, equipment maintenance and cleaning protocols, erosion and sediment control measures (e.g., sand and gravel bags, fiber rolls, and silt fencing), use of weed-free erosion control products, and preparation and implementation of a Storm Water Pollution Prevention Plan (SWPPP), would be required of the construction contractor. The SWPPP would be prepared pursuant to the National Pollutant Discharge Elimination System (NPDES) General Construction Permit (Water Quality Order 99-08-DWQ). The SWPPP would address the potential sources and locations of stormwater contamination characteristics, impacts of specific contaminants, and temporary and permanent erosion control practices and would include water sampling data, construction practices that minimize stormwater contamination, coordination of BMPs with planned construction activities, and compliance with County, state, and federal regulations. With the implementation of construction BMPs, temporary indirect impacts to San Diego County viguiera, the only sensitive plant species observed on the project site, would be less than significant, and no mitigation would be required.

Special status wildlife species observed on the site include the monarch butterfly (*Danaus plexippus*) and red-shouldered hawk (*Buteo lineatus*). No other sensitive wildlife species were observed on the project site, and no sensitive wildlife species were determined to have a high potential to occur on the project site. No sensitive or native vegetation communities that could support sensitive wildlife species were observed on the project site, and the disturbed habitat on the project site is unlikely to support sensitive wildlife species. However, the small number of cottonwood, eucalyptus, palm, and pine trees in the disturbed habitat and urban/developed land on the project site provide suitable nesting habitat for red-shouldered hawk and suitable overwintering habitat for monarch butterfly.

Permanent impacts to approximately 0.83 acre of disturbed habitat and approximately 3.54 acres of urban/developed land would occur during project implementation (Appendix D). The small area of disturbed habitat on the project site is mowed non-native grasses and other non-native annuals that provide marginal foraging habitat for sensitive mammals, raptors, and other sensitive bird species. The mature shrubs and trees in the central portion and around the edges of the project site provide nesting habitat for sensitive birds and raptors, including red-shouldered hawk, which was observed on and surrounding the project site during the 2021 survey. Removal of the potential nesting habitat would result in potentially significant impacts to sensitive birds and raptors; however, with implementation of Mitigation Measure BIO-1, impacts would be less than significant.

Adult monarch butterflies were observed flying through the project site during the 2021 survey. No milkweed that would support monarch butterfly reproduction occurs on the project site. However, a small number of eucalyptus and pine trees that could be suitable for overwintering monarch butterflies occur on the project site. Removal of the potential overwintering habitat would result in potentially significant impacts to sensitive monarch butterflies; however, with implementation of Mitigation Measure BIO-2, impacts would be less than significant.

Indirect impacts to sensitive wildlife species during project construction could include noise, dust deposition, increased soil erosion, increased human activity, introduction of non-native species, increased presence of predators (e.g., coyotes, ravens) from trash, and increased potential of

exotic species invasion due to human activity and soil disturbance. Implementation of the project has the potential to drive sensitive wildlife species from the construction area because of noise, equipment operation, and human activity. Disturbance of this potential nesting and overwintering habitat would result in potentially significant impacts to sensitive wildlife species. As previously discussed, standard construction BMPs, including dust suppression measures, weeds and invasive species control measures, equipment maintenance and cleaning protocols, erosion and sediment control measures (e.g., sand and gravel bags, fiber rolls, and silt fencing), use of weed-free erosion control products, and preparation and implementation of a SWPPP, would be required of the construction contractor during construction. Additional BMPs that would be required during construction include noise suppression measures and trash containment methods. With the implementation of construction BMPs, indirect impacts to sensitive wildlife species during construction would be less than significant, and no mitigation would be required.

Indirect impacts from project operation, including noise, human activity, and predation by domestic animals, have the potential to disturb sensitive wildlife species. However, the project site is currently developed and surrounded by urban development. Operation of the project, which includes residential land uses, would not result in a significant increase to the current level of noise and human activity in the area. Therefore, potential indirect impacts to sensitive wildlife species during operation would be less than significant, and no mitigation would be required.

Project implementation has the potential to impact bird and raptor species that are protected under the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code, Section 3504. As previously discussed, adult red-shouldered hawks were observed perched on the baseball field fences and flying over the project site during the 2021 survey, potentially nesting in mature trees on or surrounding the project site. One Cassin's kingbird nest was observed in a cottonwood tree in the central portion of the project site. Large cottonwood trees throughout the project site, primarily in the central, northern, and southeastern portions of the project site, provide nesting habitat for many bird species. If construction is conducted during the general bird breeding season (January 15 through August 31), temporary direct impacts from disturbance and displacement of nesting birds during vegetation removal could result in potentially significant direct impacts to bird species protected under the MBTA. Indirect impacts from construction noise and vibration during clearing, grubbing, and trenching activities, if conducted during the bird breeding season, could result in potentially significant indirect impacts to bird species protected under the MBTA. With implementation of Mitigation Measure BIO-1, direct and indirect impacts to bird species would be less than significant.

The GPU EIR determined significant and unavoidable impacts to candidate, sensitive, or special status species. As considered by the GPU EIR, project impacts to sensitive habitat and/or species would be mitigated through ordinance compliance and through implementation of the following mitigation measures: installation of open space fencing and signage, and breeding season avoidance. The GPU EIR identified these mitigation measures as Bio-1.6 and Bio-1.7. As the proposed project would have a less than significant impact with mitigation 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.

BIO-1: General Nest Surveys

No grubbing, trimming, or clearing of vegetation from the project site shall occur during the general bird breeding season (January 15 through August 31). If grubbing, trimming, or clearing of vegetation cannot feasibly occur outside the general bird breeding season, a qualified biologist, as approved by the County of San Diego, shall perform a pre-construction nesting bird survey no

more than 72 hours before the start of vegetation grubbing, trimming, or clearing to determine if active bird nests are present in the affected areas. If one or more active nests are found during the pre-construction survey, a 300-foot buffer (500-foot buffer for raptors or listed species) around the nest shall be established, and no disturbance shall be allowed within the buffer until a qualified biologist determines that the nest is no longer active. If there are no nesting birds (including nest building or other breeding or nesting behavior) on the project site, grubbing, trimming, or clearing shall proceed.

When construction occurs during the bird breeding season, a qualified biologist shall conduct weekly nest surveys of the area within 100 feet of construction to survey for nesting migratory birds and raptors.

BIO-2: Pre-Construction Overwintering Monarch Butterfly Survey

If grubbing, trimming, or clearing of vegetation occurs during the winter (November 1 through February 28), a qualified biologist, as approved by the County of San Diego, shall perform a pre-construction overwintering monarch butterfly survey no more than 48 hours before the start of vegetation grubbing, trimming, or clearing to confirm there are no overwintering monarch butterflies occupying vegetation on the project site. If overwintering monarch butterflies are found during the pre-construction survey, a 50-foot buffer around the occupied vegetation shall be established, and no disturbance shall be allowed within the buffer until a qualified biologist determines that monarch butterflies are no longer occupying the vegetation. If there are no overwintering monarch butterflies on the project site, grubbing, trimming, or clearing shall proceed.

- 4(b) As discussed in Section 4(a), no sensitive vegetation communities occur on the project site, and the project is designed to avoid impacts to the channel that runs along the northeastern boundary of the project site. Project design features for avoidance of the channel would include temporary fencing during construction and permanent signage for operation of the project.

Direct permanent impacts would occur to two non-sensitive vegetation communities and land cover types, including approximately 0.83 acre of disturbed habitat and approximately 3.54 acres of urban/developed land. Therefore, permanent direct or indirect impacts to sensitive vegetation communities from implementation of the project would be less than significant, and mitigation would not be required.

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

- 4(c) The GPU EIR concluded this impact to be less than significant with mitigation. The unnamed earthen-bottom and concrete-lined channel that runs along the northeastern boundary of the project site was determined to be an ephemeral non-wetland water that does not meet the U.S. Army Corps of Engineers (USACE) and County definitions of what constitutes a wetland (Appendix D). Based on the U.S. Fish and Wildlife Service's National Wetlands Inventory and U.S. Geological Survey National Hydrography Dataset, the channel is connected to Buena Creek, which is a tributary to Agua Hedionda Creek, a traditional navigable water as defined by the USACE. Based on the direct connectivity to a traditional navigable water, the channel is likely under the jurisdiction of the USACE, Regional Water Quality Control Board (RWQCB), and California Department of Fish and Wildlife pursuant to Sections 404 and 401 of the Clean Water Act and Section 1600 of the California Fish and Game Code.

As previously discussed, the project is designed to avoid impacts to the channel and the channel would remain unchanged by the project. Project design features for avoidance of the channel would include temporary fencing during construction and permanent signage for operation of the project. Additionally, drainage across the site would be treated to avoid erosion, sedimentation, and water quality impacts to the channel. The northern portion of the site would be treated by the proposed underground vault and compact biofiltration BMP before being conveyed to the proposed 36-inch RCP along the channel. The southern portion of the site would flow in a southerly direction and would be treated by the underground vault and biofiltration basin combination and ultimately ties into the proposed 36-inch RCP. The proposed 36-inch RCP would tie into the existing 36-inch RCP across Hannalei Drive. Biofiltration basins would detain runoff; riprap would decrease erosive velocities; and inlets and on-site storm drains would safely convey runoff in the historical drainage pattern. Therefore, the project would not result in a substantial adverse effect on federally protected wetlands through direct removal, filling, hydrological interruption, or other means.

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

- 4(d) The GPU EIR concluded this impact to be significant and unavoidable. Based on a GIS analysis, the County's Comprehensive Matrix of Sensitive Species, and a Biological Resource Letter Report, it was determined that the site is not part of a regional linkage/corridor as identified on Multiple Species Conservation Program (MSCP) maps nor is it in an area considered regionally important for wildlife dispersal. The project site is completely surrounded by urban development, with single-family residential neighborhoods to the west and south, a small area of undeveloped land to the north, and the North County Transit District SPRINTER railroad tracks to the east and northeast. The project site is unlikely to provide movement and suitable dispersal areas for wildlife species or significant connections to open space areas outside the project site. Nesting and foraging opportunities within the site are limited. The presence of the urban development surrounding the project site limits large-scale east-west and north-south wildlife movement in the surrounding area.
- 4(e) The GPU EIR concluded this impact to be less than significant. The project site is not within the County of San Diego MSCP boundary and is not subject to the County of San Diego MSCP requirements. The project is consistent with the County's Guidelines for Determining Significance for Biology, the County's Resource Protection Ordinance (RPO), and MBTA, with the implementation of mitigation. The project would not conflict with the provisions of any adopted Habitat Conservation Plan, NCCP, other approved local, regional, or state Habitat Conservation Plan or any other local policies or ordinances that protect biological resources.

Conclusion

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

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

3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. Feasible mitigation measures contained in the GPU EIR (Bio-1.6 and Bio-1.7) as well as project-specific Mitigation Measures BIO-1 and BIO-2 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?

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b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to 15064.5?

☐☐☐

c) Directly or indirectly destroy a unique geologic feature?

☐☐☐

d) Directly or indirectly destroy a unique paleontological resource or site?

☐☐☐

e) Disturb any human remains, including those interred outside of formal cemeteries?

☐☐☐

Discussion

County records, as well as the database from the South Coastal Information Center was reviewed by the County-approved archaeologist, Donna Beddow, and it was determined that the project site has been surveyed (Hale 2014) for a prior approval (PDS2014-TM-5583) and cultural resources are not present on site. The proposed project is a two-lot subdivision and no ground disturbing activities are proposed. As such, neither cultural study nor monitoring is required.

5(a) The GPU EIR concluded this impact to be less than significant with mitigation. Based on an analysis of records and a survey of the property (Hale 2014) for a prior approval (PDS2014-TM-5583) by County-approved archaeologist, Donna Beddow, it has been determined that there are no impacts to historical resources because they do not occur on the project site.

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 was reviewed by the County-approved archaeologist, Donna Beddow, and it was determined that the project site has been surveyed (Hale 2014) for a prior approval (PDS2014-TM-5583) and cultural resources are not present on site. The proposed project is a two-lot subdivision and no ground disturbing activities are proposed. As such, neither cultural study nor monitoring is required.

On May 21, 2025, six tribal bands were contacted to see whether they wanted to consult on the project pursuant to AB-52. None of the tribes responded to the request for consultation.

- 5(c) 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.
- 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.

As considered by the GPU EIR, potential impacts to paleontological resources would be mitigated through ordinance compliance and through implementation of the following mitigation measures: grading monitoring under the supervision of a County-approved paleontologist and conformance with the County’s Paleontological Resource Guidelines if resources are encountered. The GPU EIR identified these mitigation measures as Cul-3.1.

- 5(e) The GPU EIR concluded this impact to be less than significant with mitigation. Based on an analysis of records and archaeological surveys of the property, it has been determined that the project site does not include a formal cemetery or any archaeological resources that might contain interred human remains.

Conclusion

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

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

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

- a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?
- 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"/>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion

Energy use was not specifically analyzed in 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 in the GPU and the GPU EIR. For example, within the Conservation and Open Space Element of the GPU, Goal COS-15 promotes sustainable architecture and building techniques that reduce emissions of criteria pollutants and greenhouse gases (GHGs), while protecting public health and contributing to a more sustainable environment. Policies, COS-15.1, COS-15.2, and COS-15.3 would support this goal by encouraging design and construction of new buildings and upgrades of existing buildings to maximize energy efficiency and reduce GHG. Goal COS-17 promotes sustainable solid waste management. Policies COS-17.1 and COS-17.5 would support this goal by reducing GHG emissions through waste reduction techniques and methane recapture. The analysis below specifically analyzes the energy use of the project.

- 6(a) The project would not increase the demand for electricity and natural gas at the project site, and gasoline consumption in the project site because no construction is proposed.
- 6(b) Energy was analyzed under the GPU and GPU EIR and has been incorporated within General Plan elements. The project would not conflict with policies within the GPU related to energy use or conflict with or obstruct a state or local plan for renewable energy or energy efficiency as specified within Appendix G of the CEQA Guidelines.

Conclusion

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

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

7. Geology and Soils – Would the project:

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

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

☐
☐
☐

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?

☐
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Discussion

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

7(a)(ii) The GPU EIR concluded this impact to be less than significant. To ensure the structural integrity of all buildings and structures, projects must conform to the Seismic Requirements as outlined within the California Building Code. In addition, the proposed project is a two-lot subdivision and no ground disturbing activities are proposed.

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

7(a)(iv) The GPU EIR concluded this impact to be less than significant. The project is not located in a Landslide Susceptibility Area classified as "generally susceptible" as identified in the County Guidelines for Determining Significance for Geologic Hazards.

7(b) The GPU EIR concluded this impact to be less than significant. According to the Soil Survey of San Diego County, the soils on site are identified as artificial fill (undocumented), quaternary alluvial deposits (Qa), and cretaceous tonalite (Kt). However, the project would not result in substantial soil erosion or the loss of topsoil because any future construction would be required to comply with the Watershed Protection Ordinance (WPO) and Grading 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.

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 in a Landslide Susceptibility Area, as identified in the County Guidelines for Determining Significance for Geologic Hazards. Furthermore, the site is not within a Potential

Liquefaction Area. As such, the on-site geological formations are not expected to be unstable or become unstable as a result of the project.

To assure that any proposed buildings are adequately supported, a Soils Engineering Report would be required as part of the Building Permit process. This Report would evaluate the strength of underlying soils and make recommendations on the design of building foundation systems. The Soils Engineering Report must demonstrate that a proposed building meets the structural stability standards required by the California Building Code. The report must be approved by the County prior to the issuance of a Building Permit. With this standard requirement, in addition to compliance with the County’s Grading Ordinance and Building Code and implementation of standard engineering techniques, impacts would be less than significant.

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

- 7(d) The GPU EIR determined impacts from expansive soils to be less than significant. The project is not underlain by expansive soils. As previously discussed, the GPU EIR determined impacts from expansive soils to be less than significant. As the project would have a less than significant impact for the reasons detailed above, the project would be consistent with the analysis in the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance other than the information identified in the GPU EIR.
- 7(e) The GPU EIR concluded this impact to be less than significant. No additional wastewater disposal systems are proposed at this time. As previously discussed, the GPU EIR determined impacts to wastewater disposal systems to be less than significant. As the project would have a less than significant impact for the reasons detailed above, the project would be consistent with the analysis in the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance other than the information identified in the GPU EIR.

Conclusion

With regard to the issue area of geology and soils, the following findings can be made:

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

8. Greenhouse Gas Emissions – Would the project:

Significant Project Impact	Impact not Identified by GPU EIR	Substantial New Information
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a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

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b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

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Discussion

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

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

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

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

The County General Plan incorporates smart growth and land planning principles intended to reduce vehicle miles traveled (VMT) and thereby reduce GHG emissions. The General Plan directed preparation of a County Climate Action Plan (CAP) with reduction targets, development of regulations to encourage energy-efficient building design and construction, and development of regulations that encourage energy recovery and renewable energy facilities, among other actions. These planning and regulatory efforts are intended to ensure that actions of the County do not impede Assembly Bill (AB) 32 and SB 375 mandates.

As discussed in Section 6, Energy, construction and operation of the project is not expected to result in the wasteful or inefficient use of energy. GHG emissions associated with electricity use would be eliminated as California decarbonizes the electrical generation infrastructure as committed to by 2045 through SB 100, the 100 percent Clean Energy Act of 2018. Therefore, the project would contribute its “fair share” of what is required to achieve carbon neutrality of buildings by 2045.

The project is for the subdivision of one lot into two lots. Therefore, the project would not generate GHG emissions, either directly or indirectly, that would have a significant impact on the environment, and impacts would be less than significant.

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

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

Executive Order (EO) S-3-05 and EO B-30-15 established GHG emissions reduction targets for the state, and AB 32 launched the CARB Climate Change Scoping Plan that outlined the reduction measures needed to reach the 2020 target, which the state has achieved. As required by SB 32, CARB’s 2017 Climate Change Scoping Plan outlines reduction measures needed to achieve the 2030 target. AB 1279, the California Climate Crisis Act, codified the carbon neutrality target as 85 percent below 1990 levels by 2045. CARB’s 2022 Scoping Plan outlines the reduction measures needed to achieve the 2045 target.

The project is for the subdivision of one lot into two lots and would not conflict with implementation of statewide GHG reduction goals, the 2017 Scoping Plan, the 2022 Scoping Plan, San Diego Forward, or the County General Plan. Therefore, the project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emission of GHGs, and impacts would be less than significant. Thus, the project would not conflict with any applicable plan, policy or regulation adopted for the purpose of reducing emissions of GHGs emissions.

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

Conclusion

With regard to the issue area of 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. Feasible mitigation measures contained in the GPU EIR would be applied to the project.

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

Significant Project Impact	Impact not Identified by GPU EIR	Substantial New Information
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<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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	Significant Project Impact	Impact not Identified by GPU EIR	Substantial New Information
9. Hazards and Hazardous Materials – Would the project:			
reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?			
b) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<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 transmitting significant public health diseases or nuisances?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion

- 9(a) The GPU EIR determined impacts from transport, use, and disposal of hazardous materials and accidental release of hazardous materials to be less than significant. As the project would have a

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

- 9(b) The GPU EIR determined impacts from hazards to schools to be less than significant. The proposed project would have a less than significant impact because it is a minor subdivision of land and would not create new impacts or increase impacts, and there is no new information of substantial importance other than the information identified in the GPU EIR.
- 9(c) The GPU EIR concluded this impact to be less than significant. 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 include 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 the proposed project would have a less than significant impact for the reasons detailed above, the project would be consistent with the analysis in the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance other than the information identified in the GPU EIR.
- 9(d) The GPU EIR concluded this impact to be less than significant with mitigation. The project is located not within an Airport Land Use Compatibility Plan (ALUCP).

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

- 9(e) The GPU EIR concluded this impact to be less than significant with mitigation. The project is not within 1 mile of a private airstrip. Therefore, the project would be consistent with the analysis in the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance other than the information identified in the GPU EIR.
- 9(f)(i) The GPU EIR concluded this impact to be less than significant with mitigation.

OPERATIONAL AREA EMERGENCY PLAN AND MULTI-JURISDICTIONAL HAZARD MITIGATION PLAN:

The project would not interfere with this plan because it would not prohibit subsequent plans from being established or prevent the goals and objectives of existing plans from being carried out.

- 9(f)(ii) **SAN DIEGO COUNTY NUCLEAR POWER STATION EMERGENCY RESPONSE PLAN:** The property is not within the San Onofre Emergency Planning Zone.

- 9(f)(iii) **OIL SPILL CONTINGENCY ELEMENT:**
The project is not located along the Coastal Zone.

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

9(f)(v) DAM EVACUATION PLAN:

The project site is not within a Dam Inundation Zone. Therefore, the project would not impair implementation of or physically interfere with an adopted Dam Evacuation Plan.

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

9(g) The GPU EIR concluded this impact as significant and unavoidable. The project is within the Very High Fire Hazard Severity Zone (FHSZ). 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. See Wildfires section below.

Implementation of these fire safety standards would occur during the Building Permit process and is consistent with GPU EIR Mitigation Measure Haz-4.3. In addition, the project is consistent with the Zoning Ordinance and the density established under the County 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 in the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance other than the information identified in the GPU EIR.

9(h) The GPU EIR concluded this impact as less than significant. The project does not involve or support uses that would allow water to stand for a period of 72 hours or more (e.g., artificial lakes, agricultural ponds). Also, the project does not involve or support uses that would produce or collect animal waste, such as equestrian facilities, agricultural operations (chicken coops, dairies, etc.), solid waste facilities, or other similar uses. Therefore, the project would not substantially increase current or future resident's exposure to vectors, including mosquitoes, rats, or flies.

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

Conclusion

The project could result in potentially significant impacts to hazards and hazardous materials; however, further environmental analysis is not required because:

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

2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. Feasible mitigation measures contained in the GPU EIR (Haz-4.3) as well as project-specific Mitigation Measure HAZ-1 would be applied to the project.

	Significant Project Impact	Impact not Identified by GPU EIR	Substantial New Information
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10. Hydrology and Water Quality –

Would the project:

a) Violate any waste discharge requirements?

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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?

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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?

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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)?

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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?

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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?

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

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	Significant Project Impact	Impact not Identified by GPU EIR	Substantial New Information
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10. Hydrology and Water Quality –

Would the project:

h) Provide substantial additional sources of polluted runoff?

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

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j) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?

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k) Expose people or structures to a significant risk of loss, injury or death involving flooding?

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l) Expose people or structures to a significant risk of loss, injury or death involving flooding as a result of the failure of a levee or dam?

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m) Inundation by seiche, tsunami, or mudflow?

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Discussion

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

- SWQMP for Standard Projects prepared by Hunsaker and Associates, dated July 7, 2023 (Appendix E)

The following responses have incorporated the analysis from the reports.

10(a) The GPU EIR concluded this impact to be significant and unavoidable. The proposed Project does not involve any construction. Therefore, the project would be consistent with the analysis in the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance other than the information identified in the GPU EIR.

10(b) The GPU EIR concluded this impact to be significant and unavoidable. The site is located within Las Lomas Muertas Sub-Area (HSA 905.32), which is part of the San Pasqual Hydrologic Area (905.30). Under Section 303(d) of the Clean Water Act, the San Pasqual Watershed was identified as impaired for a number of pollutants, including fecal bacteria, metals/metalloids, nutrients, salinity, toxicity, pesticides, and sediment. The project could contribute to release of these pollutants; however, the project would comply with the WPO and implement site design measures, source control BMPs, and structural BMPs to prevent a significant increase of pollutants to receiving waters.

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

- 10(c) The GPU EIR concluded this impact to be significant and unavoidable. The project would be consistent with the analysis in the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance other than the information identified in the GPU EIR.
- 10(d) The GPU EIR concluded this impact to be significant and unavoidable. The project is within the service area of the City of Escondido Water District, which obtains water from a combination of local groundwater and surface water sources and imported water. The project would not increase demand for potable water and non-potable water. 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 the project (that would include groundwater) would be similar to those accounted for in the City of Escondido Master 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.

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

- 10(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 no construction is proposed.
- 10(f) The GPU EIR concluded this impact to be less than significant with mitigation. According to the SWQMP for Standard Projects prepared by Hunsaker and Associates, dated July 7, 2023, the project would not alter the existing drainage pattern in a manner that would result in flooding on- or off-site. Therefore, the project would be consistent with the analysis in the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance other than the information identified in the GPU EIR.
- 10(g) The GPU EIR concluded this impact to be less than significant with mitigation. Pursuant to the SWQMP for Standard Projects prepared by Hunsaker and Associates, dated July 7, 2023, project would detain stormwater on site and would not increase peak flows; therefore, the project would not contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems.

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

- 10(h) The GPU EIR concluded this impact to be significant and unavoidable. The project has the potential to generate pollutants; however, because the project is consistent with the analysis in

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

- 10(i) The GPU EIR concluded this impact to be less than significant with mitigation. No Federal Emergency Management Agency (FEMA) or County-mapped floodplains were identified on the project site. The project would not place housing within a County or federal floodplain or flood way.

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

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

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

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

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

The site is not within a Dam Inundation Zone. Therefore, the project would not expose people or structures to a significant risk of loss, injury, or death involving flooding as a result of the failure of a levee or dam.

As previously discussed, the GPU EIR determined impacts from dam inundation and flood hazards and emergency response and evacuation plans as less than significant with mitigation. The project would have a less than significant impact for the reasons detailed above. Therefore, the project would be consistent with the analysis in the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance other than the information identified in the GPU EIR.

- 10(m)(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. Refer to 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 in the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance other than the information identified in the GPU EIR.

Conclusion

With regard to the issue area of hydrology and water quality, the following findings can be made:

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

	Significant Project Impact	Impact not Identified by GPU EIR	Substantial New Information
11. Land Use and Planning – Would the project:			
a) Physically divide an established community?	<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 for a minor residential subdivision and is consistent with the County Zoning Ordinance Land Use Regulation and density established under the County 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 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 in the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance other than the information identified in the GPU EIR.

- 11(b) The GPU EIR concluded this impact to be less than significant. The site is subject to the General Plan Regional Category Semi-Rural, Land Use Designation Semi-Rural Residential (SR-2). Zoning for the site is Limited Agricultural (A70). The project is for a minor subdivision and would not conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect, including policies of the General Plan and Community Plan.

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

Conclusion

With regard to the issue area of land use and planning, the following findings can be made:

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

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

a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

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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?

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Discussion

- 12(a) The GPU EIR determined that impacts to mineral resources would be significant and unavoidable. The California Surface Mining and Reclamation Act required classification of land into Mineral Resource Zones (MRZs). The project site has been classified by the California Department of Conservation – DMG (Update of Mineral Land Classification: Aggregate Materials in the Western

San Diego Production-Consumption Region, 1997) as being within an area of Potential Mineral Resource Significance (MRZ-3). However, the project site has no alluvium or mines and is surrounded by residential, commercial, and institutional (e.g., churches, schools) 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 in the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance other than the information identified in the GPU EIR.

- 12(b) The GPU EIR concluded this impact to be significant and unavoidable. The project site is located in an MRZ-3 zone. There are no active mines on the project site. Therefore, no potentially significant loss of availability of a known mineral resource of locally important mineral resource recovery (extraction) site delineated on a local General Plan, specific plan or other land use plan would occur as a result of this project. Therefore, the project would be consistent with the analysis in the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance other than the information identified in the GPU EIR.

Conclusion

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

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

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

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

d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

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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?

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

☐☐☐**Discussion**

- 13(a) The GPU EIR concluded this impact to be less than significant with mitigation. The project is for the subdivision of one parcel into two parcels for residential and agricultural uses. The area surrounding the project site consists of residential and agricultural uses and no new sources of noise will be introduced with the project. Therefore, the project would be consistent with the analysis in the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance other than the information identified in the GPU EIR.
- 13(b) The GPU EIR concluded this impact to be less than significant with mitigation. The project is for the subdivision of one parcel into two parcels for residential and agricultural uses. The area surrounding the project site consists of residential and agricultural uses and no new sources of noise will be introduced with the project. There are no noise impacts associated with this project. Therefore, the project would be consistent with the analysis in the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance other than the information identified in the GPU EIR.
- 13(c) The GPU EIR concluded this impact to be significant and unavoidable. . The project is for the subdivision of one parcel into two parcels for residential and agricultural uses. The area surrounding the project site consists of residential and agricultural uses and no new sources of noise will be introduced with the project. There are no noise impacts associated with this project and the project would be consistent with the analysis in the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance other than the information identified in the GPU EIR.
- 13(d) The GPU EIR concluded this impact to be less than significant with mitigation. The project is for the subdivision of one parcel into two parcels for residential and agricultural uses. The area surrounding the project site consists of residential and agricultural uses and no new sources of noise will be introduced with the project. As the project would have a less than significant impact, the project would be consistent with the analysis in the GPU EIR because it would not create new

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

- 13(e) The GPU EIR concluded this impact to be less than significant with mitigation. The project site is not within the boundaries of an Airport Land Use Plan and is not within 2 miles of a public use airport or private airstrip. As such, the project would not expose residents to excessive noise levels and no impacts would occur. Therefore, the project would be consistent with the analysis in the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance other than the information identified in the GPU EIR.
- 13(f) The GPU EIR concluded this impact to be less than significant with mitigation. The project is not located within a 1-mile vicinity of a private airstrip. Therefore, the project would be consistent with the analysis in the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance other than the information identified in the GPU EIR.

Conclusion

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

1. No peculiar impacts to the project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. Feasible mitigation measures contained in the GPU EIR (Noi-1.1) as well as project-specific Mitigation Measure NOI-1 would be applied to the project.

Significant Project Impact	Impact not Identified by GPU EIR	Substantial New Information
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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)?

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

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

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Discussion

- 14(a) The GPU EIR concluded this impact to be less than significant. The project is consistent with density and lot size requirements of the General Plan and Zoning Ordinance. The project is consistent with the density allowable under the General Plan, and 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 in the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance other than the information identified in the GPU EIR.

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

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

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

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

Conclusion

With regard to the issue area of population and housing, the following findings can be made:

1. No peculiar impacts to the project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. No mitigation measures contained in 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
15. Public Services – Would the project:			
a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance service ratios for fire protection, police protection, schools, parks, or other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion

15(a) The GPU EIR concluded this impact to be less than significant with mitigation for all public services with the exception of school services, which would remain significant and unavoidable. The project is for the subdivision of one parcel into two parcels for residential and agricultural uses. The project does not involve the construction of new or physically altered governmental facilities including but not limited to fire protection facilities, sheriff facilities, schools, or parks to maintain acceptable service ratios, response times or other performance service ratios or objectives for any public services. Therefore, the project would not have an adverse effect on the environment because the project does not require new or significantly altered services or facilities to be constructed.

Water service would be provided by the City of Escondido Water District. A service availability letter from the District (Appendix G) indicated that it has sufficient capacity to serve the project.

Fire and emergency protection is discussed below.

Pursuant to the service availability letter from the Escondido Union School District (Appendix H), students living within this community would attend schools of the Escondido Union School District.

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

As previously discussed, the GPU EIR determined impact to fire protection services, police protection services and other public services as significant with mitigation while school services remained significant and unavoidable. However, as the project would have a less than significant impact for the reasons stated above, the project would be consistent with the analysis in the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance other than the information identified in the GPU EIR.

Conclusion

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

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

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

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

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

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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?

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Discussion

16(a) The GPU EIR concluded this impact to be less than significant with mitigation. The project is for the subdivision of one parcel into two parcels for residential and agricultural uses. The project would not increase the use of existing neighborhood and regional parks. As the project would have a less than significant impact, the project would be consistent with the analysis in the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance other than the information identified in the GPU EIR.

16(b) The GPU EIR concluded this impact to be less than significant with mitigation. The project does not include the construction of new active recreational facilities. As the project would have a less than significant impact, the project would be consistent with the analysis in the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance other than the information identified in the GPU EIR.

Conclusion

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

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

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

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

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

☐☐☐

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

☐☐☐

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

☐☐☐

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

☐☐☐

e) Result in inadequate emergency access?

☐☐☐

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

☐☐☐

Discussion

The GPU included the adoption of new General Plan Elements, including the Mobility Element (ME), which set the goals and policies that guide future development.

One policy goal of the GPU ME is to require development projects to provide associated road improvements necessary to achieve a level of service of “D” or higher on all ME roads except for those where a failing level of service has been accepted by the County.

As part of the GPU EIR, a County Traffic and Circulation Assessment Report was conducted to evaluate forecast roadway network operations to identify and forecast operational deficiencies along State

highways and County ME roadways with associated mitigation requirements assuming buildout of the various land use alternatives in the GPU.

Guidelines were also established for Determining Significance for Transportation and Traffic pursuant to CEQA for evaluating adverse environmental effects that a proposed project may have on transportation and traffic consistent with the GPU. A project would demonstrate this through a traffic study using level of service (LOS) and application of General Plan elements, which set the goals and policies that would show whether the projects impacts are covered by the GPU EIR.

Projects consistent with the GPU EIR analysis, policies, goals, and guidelines for evaluating adverse environmental impacts for transportation and traffic will not be subject to Senate Bill 743 and Vehicle Miles Traveled (VMT).

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

The project consists of a two-lot split. Based on SANDAG's (Not So) Brief Guide of Vehicular Traffic Generation Rates for the San Diego Region, the project will generate no more than 20 Average Daily Trips (ADT). Section 2.1.1 in the County's Traffic Guidelines state that projects that generate less than 200 ADT will not result in direct traffic impacts, due to the minimal trips distributed to the roadways and intersections in proximity to the project site. These trips will not meet the minimum thresholds to require analysis or trigger a significant impact.

As previously discussed, the GPU EIR determined significant and unavoidable impacts to unincorporated County traffic and LOS standards. As the project would have a less than significant impact for reasons stated above, the project would be consistent with the analysis 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 designated congestion management agency for the County is SANDAG. In October 2009, the San Diego region elected to be exempt from the State Congestion Management Plan, and since this decision, SANDAG has been abiding by 23 CFR 450.320 to ensure the region's continued compliance with the federal congestion management process.

Since the GPU EIR concluded this impact to be significant and unavoidable, the project would not conflict with an applicable congestion management 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 within an ALUCP. Furthermore, the project does not propose the construction of any structure equal to or greater than 150 feet in height that would constitute a safety hazard to aircraft and/or

operations from an airport or heliport. Therefore, the project would be consistent with the analysis in the GPU EIR because it would not increase impacts identified in the GPU EIR.

17(d) The GPU EIR concluded this impact to be significant and unavoidable. The project would not substantially alter traffic patterns, roadway design, place incompatible uses (e.g., farm equipment) on existing roadways, or create curves, slopes or walls which would impede adequate sight distance on a road. The nearest public road, Oro Verde and would meet County design standards and sight distance requirements. As previously discussed, the GPU EIR determined impacts on rural road safety to be significant and unavoidable. The project would have a less than significant impact as improvements would not result in changes to roadway design that would cause increased hazards. Therefore, the project would be consistent with the analysis in the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance other than the information identified in the GPU EIR.

17(e) The GPU EIR concluded this impact to be less than significant with mitigation. The project would not result in inadequate emergency access. Both Lots 1 and 2 are consistent with Title 14 and RDDFPD dead end road length maximums based on parcel size and/or land use. Lot 1 access complies with the updated Government Code and secondary access will not be required for one single family residence. Lot 2 agricultural is exempt from dead end road lengths per Title 14, Article 1 stating Exception: Roads used solely for agricultural, mining, or the management and harvesting of wood products. In addition, consistent with GPU EIR Mitigation Measure Tra-4.2, the project would implement the Building and Fire Codes to ensure emergency vehicle accessibility.

As previously discussed, the GPU EIR determined impacts on emergency access as less than significant with mitigation. The project would have a less than significant impact with the implementation of project conditions of approval for adherence to the Building and Fire Codes, consistent with GPU EIR Mitigation Measure Tra-4.2. Therefore, the project would be consistent with the analysis in the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance other than the information identified in the GPU EIR.

17(f) The GPU EIR concluded this impact to be less than significant with mitigation. The project is not within the vicinity of any planned public transit or pedestrian facilities. The project does not include any improvements which would inhibit the future performance of any pedestrian or bike facilities. Therefore, the project would not conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities.

As previously discussed, the GPU EIR determined impacts on alternative transportation to be significant with mitigation. The project would have a less than significant impact. Therefore, the project would be consistent with the analysis in the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance other than the information identified in the GPU EIR.

Conclusion

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

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

2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. Feasible mitigation measures contained in the GPU EIR (Tra-4.2) would be applied to the project. The project applicant is required to comply with the County Public Road Standards and Guidelines for Determining Significance, coordinate with other jurisdictions to identify appropriate mitigation, and implement the Building and Fire Codes to ensure adequate services are in place.

Significant Project Impact	Impact not Identified by GPU EIR	Substantial New Information
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18. Utilities and Service Systems –

Would the project:

a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

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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?

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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?

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d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

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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?

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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?

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Discussion

- 18(a) The GPU EIR concluded this impact to be less than significant with mitigation. The project has an on-site wastewater system that has been approved by the County of San Diego Department of Environmental Health and Quality (DEHQ). Therefore, the project would be consistent with the wastewater treatment requirements of the RWQCB. 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 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.

- 18(b) The GPU EIR concluded this impact to be less than significant with mitigation. The project has an on-site wastewater system that has been approved by the County of San Diego Department of Environmental Health and Quality (DEHQ). Water Service will be provided by the Rincon del Diablo Water District. No construction of new water or wastewater facilities is required. 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 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.

- 18(c) The GPU EIR concluded this impact to be less than significant with mitigation. The project does not involve any new stormwater drainage facilities. 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.

- 18(d) The GPU EIR concluded this impact to be significant and unavoidable. The project would receive water from the City of Escondido Water District, which has adequate water to serve the project according to the water service availability form dated September 1, 2022 (Appendix G). As the project would have a less than significant impact, the project would be consistent with the analysis provided in the GPU EIR because it would not increase impacts identified in the GPU EIR.

- 18(e) The GPU EIR concluded this impact to be less than significant with mitigation. The project has an on-site wastewater system that has been approved by the County of San Diego Department of Environmental Health and Quality (DEHQ). Therefore, the project would not interfere with any wastewater treatment provider's service capacity. 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.

- 18(f) The GPU EIR concluded this impact to be significant and unavoidable. All solid waste facilities, including landfills, require solid waste facility permits to operate. There are five, permitted active landfills in San Diego County with remaining capacity to adequately serve the project. Therefore, the project would be consistent with the analysis 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.

- 18(g) The GPU EIR concluded this impact to be less than significant. The project would deposit all solid waste at a permitted solid waste facility. Therefore, the project would be consistent with the analysis in the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance other than the information identified in the GPU EIR.

Conclusion

With regard to the issue area of 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 in 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
19. Wildfire – If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:			
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts in the environment?	<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 GPU EIR 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. In the GPU EIR, the issue of wildland fires was determined to be significant and unavoidable.

- 19(a) The GPU EIR concluded this impact to be significant and unavoidable. The project site is located within the Urban-Wildland Interface area. The property lies within a State Responsibility Area (SRA) very high fire hazard severity zone (VHFHSZ). Fire and emergency protection would be

provided by the Rincon De Diablo Fire Protection District (RDDFPD). The project is located in the Escondido Fire Department (EFD) District 2. The EFD operates at least two fire stations that could respond to an incident on the site under 7.5 minutes travel time. A service availability letter from the Escondido Fire Department (Appendix F) indicated that the EFD has sufficient capacity to serve the project.

According to the service availability letter from the Escondido Fire Department (Appendix Q), the nearest fire station is Fire Station 4 at 3301 Bear Valley PRWY and is 3.1 miles away, which meets the General Plan Safety Element standard of 10 minutes for lands designated as SR-2. Due to the factors above, the Project will not substantially impair an adopted emergency response plan or emergency evacuation plan

- 19(b) The GPU EIR concluded this impact to be significant and unavoidable. The project is within the VHFHSZ. The project would comply with regulations relating to emergency access, water supply, and defensible space specified in the County Fire Code and Consolidated Fire Code.

Specifically:

- Water service will be provided by City of Escondido. The Rincon Del Diablo Fire Protection District requires new development to meet 2,500 gpm fire flow (SDCCFC Sec. 507.3) and remain above 20 psi when meeting the fire requirements, or as otherwise acceptable to the Fire Department. As planned, the project meets fire flows.
- The Project includes fire access and is consistent with the County and Escondido Fire Protection District Fire Codes. Access to Lot 1 of the Tentative Parcel Map will be provided from an existing road (Vista Lucia, 24-foot width via a 20-foot-wide). Lot 2, which will continue operation of the avocado grove and has primary access via Diamond Ranch Road off the SR-78 and is exempt from road requirements based on its agricultural use, per Title 14, Article 1.
- Both Lots 1 and 2 are consistent with Title 14 and RDDFPD dead end road length maximums based on parcel size and/or land use. Lot 1 access complies with the updated Government Code and secondary access will not be required for one single family residence. Lot 2 agricultural is exempt from dead end road lengths per Title 14, Article 1 stating Exception: Roads used solely for agricultural, mining, or the management and harvesting of wood products.
- All new structures shall have a permanently posted address, which shall be legible from the street. If it is not legible from the street, an address shall also be posted at street entrance to driveway and shall be visible from both directions of travel. Numbers shall be 4 inches high with 0.5-inch stroke and located 6–8 feet above ground level. Numbers will contrast with background.
- An existing hydrant is located on Vista Lucia adjacent to the driveway entrance to serve Lot 1. The nearest hydrant for Lot 2 is associated with Royal View Road.
- Fuel modification zones are designed to gradually reduce fire intensity and flame lengths from advancing fire by strategically placing thinning zones, restricted vegetation zones, and irrigated zones adjacent to each other on the perimeter of the wildland–urban interface (WUI) exposed structures. Because this site will utilize ignition resistant construction techniques and materials, the proposed fuel modification areas are anticipated to provide adequate set back from naturally occurring fuels.

Implementation of these fire safety standards is consistent with GPU EIR Mitigation Measure Haz-4.3. In addition, the project is consistent with the Zoning Ordinance and the density established under the County General Plan. Therefore, for the reasons stated above, the project would not be expected to experience exacerbated wildfire risks due to slope, prevailing winds, or other factors.

As previously stated, wildfire was analyzed in GPU EIR Section 2.7, Hazards and Hazardous Materials, and was determined to be significant and unavoidable. The project would have a less than significant impact with the implementation of GPU EIR Mitigation Measure Haz-4.3 for compliance with the Building and Fire Codes. Therefore, the project would be consistent with the analysis in the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance other than the information identified in the GPU EIR.

- 19(c) The GPU EIR concluded this impact to be significant and unavoidable. The project would not require any new development. 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 in the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance other than the information identified in the GPU EIR.

- 19(d) The GPU EIR concluded this impact to be significant and unavoidable. As previously stated in Section 19(b), the project would comply with regulations relating to emergency access, water supply, and defensible space specified in the County Fire Code and Consolidated Fire Code. The site is not located within a Landslide Susceptibility Area as identified in the County Guidelines for Determining Significance for Geologic Hazards and is identified as Generally Susceptible to potential landslides. Therefore, potential hazards associated with landslides are less than significant. Additionally, compliance with the County's Grading Ordinance and Building Code and implementation of standard engineering techniques would ensure structural safety. Therefore, for the reasons stated above, the project site would not expose people or structures to significant risk, including downslopes or downstream flooding or landslides, as a result of runoff, post-fire instability, or drainage changes.

The GPU EIR concluded significant and unavoidable impacts associated with wildfire under Section 2.7, Hazards and Hazardous Materials. However, the proposed project would have a less than significant impact for the reasons detailed above. Therefore, the project would be consistent with the analysis in the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance other than the information identified in the GPU EIR.

Conclusion

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

1. No peculiar impacts to the project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. Feasible mitigation measures contained in the GPU EIR (Haz-4.3) and project conditions of approval by the Vista Fire Protection District would be applied to the project. These mitigation

measures, as detailed above, requires the project applicant to implement brush management and comply with the Building and Fire Codes.

Appendices

Appendix A – References

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

Appendix C – Biological Resources Letter Report

Appendix D – CAP Checklist

Appendix E – Stormwater Quality Management Plan

Appendix F – Escondido Fire Department Service Availability Letter

Appendix G – City of Escondido Water District Service Availability Letter

Appendix H – Escondido Union School District Service Availability Letter

Appendix A

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

References

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

https://www.sandiegocounty.gov/content/dam/sdc/pds/gpupdate/docs/BOS_Aug2011/EIR/FEIR_5.00_-_References_2011.pdf.

County of San Diego. General Plan Update Environmental Impact Report (2011).

County of San Diego. General Plan Update (2011).

Dudek. Biological Resources Letter Report (June, 2023).

Escondido Fire District. Fire Service Availability Form (2023).

Escondido Union School District. School Service Availability Form (2023).

Hunsaker and Associates. SWQMP For Standard Development Projects (July 7, 2023).

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.