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June 11, 2026

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

Project Name: Fitch Los Coches Tentative Parcel Map
Project Record Numbers: PDS2023-TPM-21331
Environmental Log Number: PDS2023-ER-23-14-005
APN(s): 397-060-79-00

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

County Staff Contact:
Enrique Aponte, Project Manager
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Project Location:
The Fitch Los Coches Tentative Parcel Map (Project) is within the Lakeside Community Planning Area of unincorporated San Diego County. The approximately 2.65-acre project site is located at 9011 Los Coches Rd. The project site is surrounded by single-family residential uses to the east, south, and west. The Lakeside Linkage County Preserve is located northwest of the project site. The project site contains a portion of Los Coches Creek.

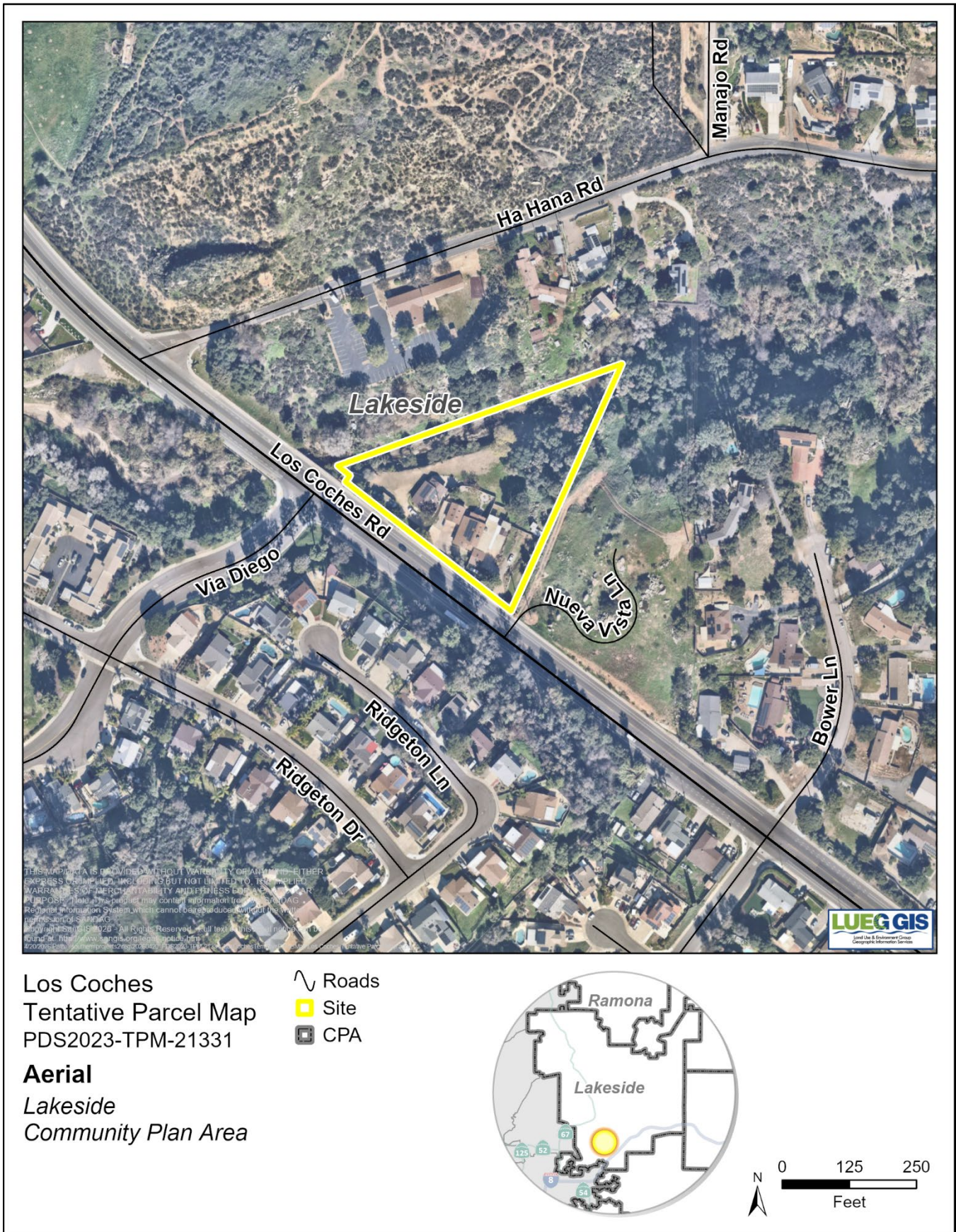


Figure 1: Project Site Aerial

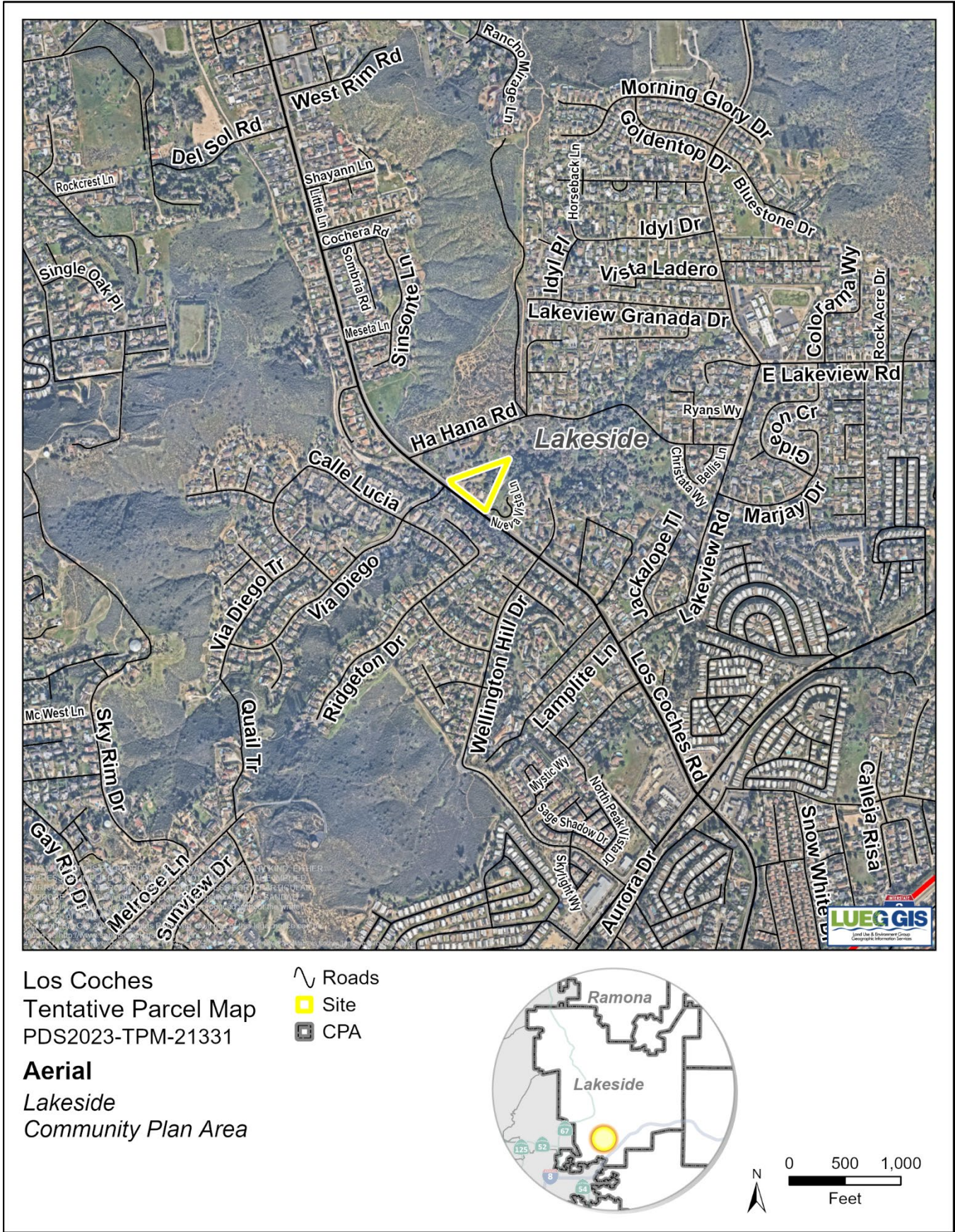


Figure 2: Project Regional Vicinity

Project Applicant Name and Address:

Dan Fitch, Property Owner
Morehead West LLC
9011 Los Coches Road
Lakeside, California 92040

General Plan:

Community Plan: Lakeside
Regional Categories: Village
Land Use Designations: Village Residential (VR-4.3)
Density: 4.3 Dwelling Units per acre
Floor Area Ratio (FAR): N/A

Zoning:

Use Regulation: RS (Single Family Residential)
Animal Regulation: Q – Various Allowances in accordance with the Animal Schedule
Density: -- Density permitted through General Plan Designation
Minimum Lot Size: 10000 SF
Floor Area Ratio: -- N/A
Building Type: C – Single-family dwelling, Limited nonresidential
Height: G – 35-foot maximum, 2 stories
Setback: H – 50-foot Front Yard, 10-foot Interior Side Yard, 35-foot Exterior Side Yard, 25-foot Rear Yard
Lot Coverage: -- N/A
Open Space: -- N/A
Special Area Regulation: -- N/A

Description of Project

The project proposes to subdivide a single 2.65 acre parcel into three single-family individual lots. The three proposed parcels range in size from 18,761 square feet to 54, 751 square feet. The project site is located at 9011 Los Coches Road in the Lakeside Community Planning Area, within unincorporated San Diego County. The site is currently developed with an existing single-family residence and accessory structures such as a workshop. The applicant intends to convert the workshop to a primary dwelling unit through a future building permit including review by the Lakeside Fire Protection District. The project includes dedication of a biological open space easement and limited building zone as well as installation of open space fencing and signage in order to protect on-site biological resources and Los Coches Creek. The site is subject to the Village Residential (VR-4.3) General Plan Land Use Designation, a 10,000 square foot minimum lot size, and the Single Family Residential (RS) Zoning Use Regulation. The proposed uses are consistent with the Zoning Use Regulation and General Plan Land Use Designation of the site. Earthwork for the project consists of approximately 120 cubic yards of cut, 60 cubic yards of fill, and 60 cubic yards of export.

Access

Access to the project site and parcels would be provided by reciprocal access easements which will allow the three parcels to share access across the three parcels. The access easements ultimately connect to two driveways that provide access to two driveways connecting to Los Coches Road, which is a County of San Diego (County) maintained Mobility Element road.

Sewer

The existing parcel is currently served by the San Diego County Sanitation District in the Lakeside service area as detailed on the service availability forms. All future building permits for new residential structures on the resultant parcels will require on-site sewer laterals and cleanouts to be reviewed and permitted during the building permit process.

Water

The project site contains an existing residential structure and a well that serves the property. The project is within the Lakeside Water District and facilities are available to serve the property and resultant parcels. At the time of construction of new residential dwelling units on the property or if the existing residential structures request to connect to water service, the residential development will require extension of sewer lines to reach the property. Existing Lakeside Water District water lines are located in Via Diego, directly southwest of the project site across Los Coches Road. As detailed on the service availability forms, the project will require an extension of 200 feet of water lines.

Discretionary Approvals

The discretionary approvals required for the project include the following:

Permit Type/Action	Agency
Tentative Parcel Map	County of San Diego
Air Quality Permit to Construct	San Diego Air Pollution Control District (SDAPCD)
Clean Water Act Section 401, 404 Permits and Section 1602 Permit	San Diego Regional Water Quality Control Board (RWQCB), U.S. Army Corps. Of Engineer, U.S. Fish and Wildlife Service, California Department of Fish and Wildlife
Fire District Approval	Lakeside Fire Protection District
General Construction Stormwater Permit	Regional Water Quality Control Board (RWQCB)
Grading Permit	County of San Diego
Landscape Plans	County of San Diego
Public Improvement Plans	County of San Diego
Encroachment Permit	County of San Diego
Utility Provider Approval	California Public Utilities Commission (San Diego Gas & Electric Coordination)
Sewer District Approval	Buena Sanitation District
Water District Approval	Vista Irrigation District

Overview of 15183 Checklist

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

General Plan Update Program EIR

The County General Plan Update (GPU) establishes a blueprint for future land development in the unincorporated County that meets community desires and balances the environmental protection goals with the need for housing, agriculture, infrastructure, and economic vitality. The GPU applies to all of the unincorporated portions of the County and directs population growth and plans for infrastructure needs, development, and resource protection. The GPU included adoption of new General Plan elements, which set the goals and policies that guide future development. It also included a corresponding land use map, a County Road Network map, updates to Community and Subregional Plans, an Implementation Plan, and other implementing policies and ordinances. The GPU focuses population growth in the western areas of the County where infrastructure and services are available in order to reduce the potential for growth in the eastern areas. The objectives of this population distribution strategy are to: (1) facilitate efficient, orderly growth by containing development within areas potentially served by the San Diego County Water Authority (SDCWA) or other existing infrastructure; (2) protect natural resources through the reduction of population capacity in sensitive areas; and (3) retain or enhance the character of communities within the unincorporated County. The SDCWA service area covers approximately the western one-third of the unincorporated County. The SDWCA boundary generally represents where water and wastewater infrastructure currently exist. This area is more developed than the eastern areas of the unincorporated County and would accommodate more growth under the GPU.

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

Summary of Findings

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

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

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

1. The project is consistent with the development density established by existing zoning, community plan, or general plan policies for which an EIR was certified.

The project site is subject to the Village Residential (VR-4.3) Land Use Designation and the Single Family Residential (RS) Zoning Use Regulation. The current land use designation of Village Residential (VR-4.3) allows for 4.3 dwelling units per acre. The project site is 2.65 acres and the site has an allowable density of 11 dwelling units. The project consists of a Tentative Parcel Map that will have a maximum density of three primary dwelling units at max buildout. Therefore, the project would be consistent with the density established by the existing land use designation.

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

The subject property is no different than other properties in the surrounding area, and there are

no project specific effects which are peculiar to the project or its site. The project site is located in an area adjacent to residentially zoned property.

In addition, as explained further in the 15183 Checklist below, all project impacts were adequately analyzed by the GPU EIR. The project could result in potentially significant impacts to Biological Resources, and Cultural Resources. However, applicable mitigation measures and project design features related to these areas as specified within the GPU EIR have been made conditions of approval for this project. Additionally, project design features consistent with recent State regulations as well as consistency with applicable ordinances, CEQA guidelines for determining significance, and Board Policies that were identified as mitigation measures within the GPU EIR associated with Transportation/Traffic, Air Quality, Greenhouse Gas Emissions, Noise, Hazards, Wildfire, Hydrology/Water Quality, Public Services, and Land Use and Planning have been made conditions of approval for this project.

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

The proposed project is consistent with the use characteristics and limitations of the development considered by the GPU EIR through the processing of a Tentative Parcel Map and would represent a small part of the growth that was forecasted for buildout of the General Plan. The project would not require a Zoning Reclassification or General Plan Amendment. The project site is subject to the Village Residential (VR-4.3) Land Use Designation and the Single Family Residential (RS) Zoning Use Regulation. The current land use designation of Village Residential (VR-4.3) allows for 4.3 dwelling units per acre. The project site is 2.65 acres and the site has an allowable density of 11 dwelling units. The project consists of a Tentative Parcel Map that will have a maximum density of three primary dwelling units at max buildout. The GPU EIR considered the incremental impacts of the proposed project, and as explained further in the 15183 Checklist below, no potentially significant off-site or cumulative impacts have been identified which were not previously evaluated. The GPU EIR adequately analyzed the project’s potential impacts, and no new potentially significant off-site or cumulative impacts have been identified.

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

As explained in the 15183 Exemption Checklist below, the project as analyzed does not result in new information which would result in a determination of a more severe impact than what had been anticipated by the GPU EIR.

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

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

	June 11, 2026
Signature	Date
Enrique Aponte	Land Use/Environmental
Printed Name	Planner Title

CEQA Guidelines §15183 Exemption Checklist

Overview

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

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

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

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

1. Aesthetics

Would the project:

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
a) Have a substantial adverse effect on a scenic vista?	<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; therefore, the assessment of what constitutes a scenic vista must consider the perceptions of a variety of viewer groups.

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

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

Approximately six Resource Conservation Areas (RCAs) have been identified by the County in the Lakeside Community Plan. The RCAs are primarily biological resources and are located more than a half of a mile away from the site. The Project site contains an existing single-family residence as well as accessory structures. The surrounding uses on adjacent properties contains residential uses or vacant preserve land. The project will not impact or detract from views of RCAs identified in the Lakeside Community Plan Area due to intervening topography and structures as well as the overall distance of the project site from the RCAs. Additionally, the Project site is previously developed and contains an

existing residential structure. The additional residential structures that could be permitted on the resulting lots of the subdivision are an expected visual feature in the community.

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.

In accordance with the Caltrans State Scenic Highway System Map (Caltrans 2025), there are no officially designated or eligible state scenic highways near the project site. As described in Section 5(a) below, there are no historic buildings located on the project site. In addition, the project does not contain rock outcroppings that would be impacted or removed by development of the project. The nearest scenic highways identified in the County of San Diego General Plan are Interstate 8 located approximately a mile southeast of the project site and State Route 67 located over a mile and a half northwest of the project site. The project site will not be visible from either highway or freeway due to overall distance and intervening topography. Therefore, the project would not substantially damage scenic resources within a state scenic highway or scenic highway identified in the County of San Diego General Plan, and impacts would be less than significant.

Additional analysis regarding impacts to scenic resources and visual character can be found in response 1(a) and 1(c). As the proposed Project would have a less than significant impact for the reasons detailed above and response 1(a), the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR. 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 project site is surrounded by single-family residential uses and would be consistent within the community. The project would not detract from, or contrast with the existing visual character and/or quality of the surrounding areas. The proposed single-family

residential use would be compatible with uses in the immediate area. By constructing a development similar to the existing visual environment, the project would not result in any change to visual character. Project impacts would be less than significant.

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

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

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

Conclusion

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

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

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

2. Agriculture/Forestry Resources

Would the project:

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide or Local Importance as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, or other agricultural resources, to a non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland zoned Timberland Production?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Result in the loss of forest land, conversion of forest land to non-forest use, or involve other changes in the existing environment, which, due to their location or nature, could result in conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Important Farmland or other agricultural resources, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion

- 2(a) The GPU EIR concluded this impact to be significant and unavoidable. The project site is subject to the Single Family Residential (RS) Zoning Use Regulation and subject to the General Plan Land Use Designation Village Residential (VR-4.3). The Project site does not contain lands designated as prime soils or as Farmland of Local Importance according to the Farmland Mapping and Monitoring Program (FMMP). The soils have been historically disturbed, compacted, and modified over the last 25 or more years. Additionally, the Project site does not contain 10 acres of contiguous Prime Farmland or Statewide Importance Soils as defined by the FMMP. Therefore, the site would not be considered to be a viable agricultural resource and no potentially significant project or cumulative level conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide or Local Importance to a non-agricultural use would occur as a result of this Project. Therefore, no potentially significant impact or conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide or Local Importance to a non-agricultural use would occur as a result of this project. As previously discussed, the GPU EIR determined impacts from direct and indirect conversion of agricultural 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 provided within the GPU EIR because it would not increase impacts identified within the GPU EIR. Therefore, the project site is not classified as an important agricultural resource and there are no agricultural resources on the project site that would be impacted.

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

- 2(b) The GPU EIR concluded this impact to be less than significant with mitigation. The project site is subject to the Single-Family Residential (RS) Land Use Designation. The property does not meet the definition of “agricultural resource” as defined in the County Guidelines for Determining Significance: Agricultural Resources. Specifically, an agricultural resource is defined to include “any land with an active agricultural operation, or any site with a history of agricultural production based on aerial photography or other data sources identifying agricultural land uses” (County of San Diego 2015). As stated under 2(a) above, the project site does not meet this definition because it does not support active agricultural operations. The project site is not subject to a Williamson Act Contract or within an Agricultural Preserve. The nearest property subject to a Williamson Act Contract is approximately 5 miles northeast of the project site. Due to distance, no land-use interface conflicts would occur. Therefore, the project would not conflict with existing zoning for agricultural use or a Williamson Act contract. No impact would occur.

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

- 2(c) Forestry resources were not specifically analyzed under the GPU EIR because Appendix G of the CEQA Guidelines was amended to include significance criteria for forestry resources after the release of the Notice of Preparation (NOP) for the GPU EIR. The project site does not contain any forest lands as defined in California Public Resources Code §12220(g); therefore, project implementation would not result in the loss or conversion of forest land to non-forest use. The outer edge of the Cleveland National Forest is located over 10 miles east of the project site. In addition, the County does not have any existing Timberland Production Zones. Therefore, project implementation would not conflict with existing zoning for, or cause rezoning of, forest land, timberland, or Timberland Production Zones. Impacts would be less than significant.

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

- 2(d) Forestry resources were not specifically analyzed under the GPU EIR because Appendix G of the CEQA Guidelines was amended to include significance criteria for forestry resources after the release of the NOP for the GPU EIR. As indicated in Section 2(c), the project site does not contain any forest lands. Therefore, the project would be consistent with the analysis provided in the GPU EIR because it would not increase impacts identified in the GPU EIR.
- 2(e) The GPU EIR concluded this impact to be significant and unavoidable. As mentioned in Sections 2(a) and 2(b), the project site would not be considered an agricultural resource. Therefore, the project would not result in any conversion of agricultural resources to a non-agricultural use.

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

Conclusion

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

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

3. Air Quality

Would the project:

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
a) Conflict with or obstruct implementation of the San Diego Regional Air Quality Strategy (RAQS) or applicable portions of the State Implementation Plan (SIP)?	<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"/>

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

Discussion

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

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

The RAQS “emissions inventory, projections, and trends are based on ozone precursor emissions data compiled and maintained by CARB [California Air Resources Board]. Supporting data were jointly developed by CARB, the [SDAPCD], and [SANDAG], which each play a role in collecting and reviewing the data necessary to generate comprehensive planning emission inventories” (SDAPCD 2022). CARB modeling utilizes the most current growth and emissions control data available to provide comprehensive projections of emissions for each year from 2022 to 2050. Current regional growth projections are accounted for in the RAQS, and the project would provide additional housing needed to

meet the needs of the region. The project site is subject to the Village Residential (VR-4.3) Land Use Designation and the Single Family Residential (RS) Zoning Use Regulation. The current land use designation of Village Residential (VR-4.3) allows for 4.3 dwelling units per acre. The project site is 2.65 acres and the site has an allowable density of 11 dwelling units. The project consists of a Tentative Parcel Map that will have a maximum density of three primary dwelling units at max buildout. Because the project is consistent with the density allowed under the existing General Plan Land Use Designations and Zoning Use Regulations, the project would be consistent with the growth projections accounted for in the RAQS. The project would, therefore, not result in an increase in emissions that are not already accounted for in the RAQS. Thus, the project would not obstruct or conflict with implementation of the RAQS. Impacts would be considered less than significant.

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

- 3(b) The GPU EIR concluded impacts to be significant and unavoidable. In general, air quality impacts from land use projects are the result of emissions from area sources (landscaping and consumer products), energy (natural gas), transportation (on-road mobile sources), and short-term construction activities. The County of San Diego (County) has identified significance SLTs which incorporate SDAPCD's established air quality impact analysis trigger levels for all new source review (NSR) in SDAPCD Rule 20.2 and Rule 20.3. These SLTs identified in the County Guidelines can be used as numeric methods to demonstrate that a project's total emissions (e.g., stationary and fugitive emissions, as well as emissions from mobile sources) would not result in a significant impact to air quality. SLTs for volatile organic compounds (VOCs) are based on the threshold of significance for VOCs from the South Coast Air Quality Management District (SCAQMD) for the Coachella Valley (which is more appropriate for the San Diego Air Basin). The County's SLTs and SDAPCD's trigger levels were developed in support of State and federal ambient air quality standards that are protective of human health.

Emissions would result from construction and operation of the project. Construction impacts are short term and result from fugitive dust, equipment exhaust, and indirect effects associated with construction workers and deliveries. Operational emissions would result from mobile, area (fireplaces, consumer products, architectural coatings, and landscaping activities), energy (natural gas combustion), and stationary (emergency generator testing) sources. The project includes a minimal amount of construction at maximum buildout including construction of two residential dwelling units and utility line improvements in road right-of-way. Earthwork for the project consists of approximately 120 cubic yards of cut, 60 cubic yards of fill, and 60 cubic yards of export.

Construction activities would be subject to several control measures per the requirements of the County, SDAPCD rules, and CARB Airborne Toxic Control Measures. SDAPCD Rule 55 requires compliance with reducing fugitive dust and the project is conditioned to implement standard dust control measures to reduce fugitive dust such as the use of water trucks during construction. SDAPCD Rule 67.0.1 requires regulated coatings for all architectural coating activities.

Operations of the project consist of three residential parcels or dwellings at maximum buildout. The project site contains an existing residential dwelling that will be retained. In accordance with SANDAG's Not So Brief Guide of Vehicular Traffic Generation Rates for the San Diego Region, the project will generate an additional 24 Average Daily Trips (ADT) at max buildout of the development if two primary dwelling units are developed. The project includes a minimal amount of trips that are not anticipated to generate traffic in substantial amounts that could result in idling vehicles or accumulation of traffic that results in emissions beyond Air Quality screening level thresholds.

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

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

The project would contribute PM₁₀, NO_x, and VOCs emissions from construction/grading activities; however, the incremental increase would not exceed established screening thresholds upon implementation of measures (see response 3(b)). As previously discussed, the GPU EIR determined significant and unavoidable impacts to non-attainment criteria pollutants. However, the project would have a less than significant impact to non-attainment criteria pollutants for the reasons stated above.

Air quality impacts are basin-wide, and air quality is affected by all pollutant sources in the basin. As the individual project thresholds are designed to help achieve attainment with cumulative basin-wide standards, they are also appropriate for assessing the project's contribution to cumulative impacts. As emissions would be less than the SLTs, project construction and operation would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard, and impacts would be cumulatively less than significant.

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

- 3(d) The GPU EIR concluded this impact to be significant and unavoidable. Air quality regulators typically define sensitive receptors as schools (preschool through 12th grade), hospitals, resident care facilities, daycare centers, residences, or other facilities that may house individuals with health conditions that would be adversely impacted by changes in air quality. Single-family residential uses are located in the vicinity of the project site as close as 30 feet from the project boundary.

The two primary emissions of concern regarding health effects for land development projects are diesel particulate matter (DPM) and carbon monoxide (CO). Projects that

would site sensitive receptors near potential CO hotspots or would contribute vehicle traffic to local intersections where a CO hotspot could occur would be considered to have a potentially significant impact. The project would not introduce any new sources of toxic air contaminants; therefore, project operation would not produce a cancer risk. As detailed in Sections 3(a) and 3(b), the project will not result in emissions that are beyond SLTs. The project will include development of two additional dwelling units on a site with an existing dwelling unit that will be retained. The project includes construction of residential uses in an area that is surrounded by residential uses and is predominantly zoned for residential uses.

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

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

The potential for an odor impact is dependent on a number of variables, including the nature of the odor source, distance between the receptor and odor source, and local meteorological conditions. During construction, construction equipment may generate some nuisance odors. Sensitive receptors near the project site include residential uses; however, exposure to odors associated with project construction would be short term and temporary in nature. The project will require a minimal amount of construction at maximum buildout that would be typical of constructing two residential dwelling units and utility lines in adjacent road right-of-way. Further, per CARB's Airborne Toxic Control Measures 13 (California Code of Regulations Chapter 10 §2485), the applicant shall not allow idling time to exceed 5 minutes unless more time is required per engine manufacturers' specifications or for safety reasons. The proposed use of the project consists of residential uses and homes that are not typical of uses that can produce objectionable odors. Therefore, project construction and operation would not generate odors adversely affecting a substantial number of people, and impacts would be less than significant.

The project is also required to comply with SDAPCD Rule 51, public nuisance, which would require the limiting of objectionable odors to be emitted from the site. Therefore, the project would not create objectionable odors affecting a substantial number of people and the project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

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

Conclusion

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

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

4. Biological Resources

Would the project:

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

Discussion

The following responses are based on the Biological Resources Letter Report prepared by Vince Scheidt, Inc., dated April 2026.

- 4(a) The GPU EIR concluded this impact to be significant and unavoidable. Biological resources on the project site were evaluated in a Biological Resource Letter Report prepared by Vince Scheidt, Inc., dated April 2026. The site contains non-native grassland, coast live oak woodland, disturbed wetland, and disturbed/developed habitats. Sensitive wildlife species identified onsite include Belding's orange throated whiptail, Monarch butterfly (*Danaus plexippus*), and red-shouldered hawk (*Buteo lineatus*). One sensitive plant species, Campo clarkia (*Clarkia delicata*), was observed onsite. As a result of this project, impacts will occur to 0.4 acre of coast live oak woodland, 0.2 acre of oak root protection zone, and 1.2 acres of disturbed/developed habitat. The site is located within the Multiple Species Conservation Program (MSCP) but is not designated as a Pre-approved Mitigation Area (PAMA) or a Biological Resource Core Area (BRCA). As detailed in the Biological Resources Letter Report prepared by Vince Scheidt, Inc., dated April 2026, a Crotch's Bumble Bee Survey was completed in March of 2026 over the period of several weeks and no species of bumble bee were observed on the project site.

The project site contains a portion of Los Coches Creek along the northwestern property line of the project site. In order to preserve wetlands and comply with the Resource Protection Ordinance (RPO), the project includes dedication of an open space easement over the on-site wetlands and Los Coches Creek. No structures will be permitted within 50 feet of Los Coches Creek and the identified RPO wetland. Additionally, the open space easement will be protected and identified by open space fencing and signage. An approximately 30-foot limited building zone will also be located adjacent to the limits of the open space easement and fencing in order to prevent construction of structures that would require fuel-modification and fuel management into the open space easement. The project includes extension of water lines that are anticipated to occur within existing road right-of-way such as Los Coches Road and Via Diego. In the event that the utility line extensions and development footprint are required to be adjacent to or within jurisdictional waters near Los Coches Creek, applicable permits from outside agencies will be required. The water line extensions are anticipated to occur within existing developed area of Los Coches Road and Via Diego.

As considered by the GPU EIR, project impacts to sensitive habitat and/or species will be mitigated through ordinance compliance and through implementation of the following mitigation measures: purchase of 1.2 acre of tier I credits at a mitigation bank, dedication of an onsite open space easement over the Resource Protection Ordinance wetland, and breeding season avoidance. The GPU EIR identified these mitigation measures as Bio-1.5, Bio-1.6, Bio-1.7, and Bio-2.3.

- 4(b) The GPU EIR concluded this impact to be significant and unavoidable. Based on the Biological Resource Letter Report, wetlands and/or jurisdictional waters, were found on the site. The following sensitive habitats were identified on the site: non-native grassland, coast live oak woodland, and disturbed wetland. As detailed in Section 4(a), direct, and indirect impacts to sensitive natural communities identified in the RPO, NCCP, Fish and Wildlife Code, and Endangered Species Act are mitigated through dedication of an open space easement and purchasing of mitigation credits.

As considered by the GPU EIR, project impacts to sensitive habitats will be mitigated through ordinance compliance and through implementation of the following mitigation measures: purchase of 1.2 acre of tier I credits at a mitigation bank, dedication of an onsite open space easement over the RPO wetland, and breeding season avoidance. The GPU EIR identified these mitigation measures as Bio-1.5, Bio-1.6, Bio-1.7, and Bio-2.3.

- 4(c) The GPU EIR concluded this impact to be less than significant with mitigation. The proposed project site contains wetlands defined by Section 404 of the Clean Water Act as the site contains portions of Los Coches Creek. As detailed in Section 4(a), these features will be avoided and placed within a dedicated open space easement in order to prevent impacts from occurring.

As considered by the GPU EIR, project impacts to sensitive habitats will be mitigated through ordinance compliance and through implementation of the following mitigation measures: purchase of 1.2 acre of tier I credits at a mitigation bank, dedication of an onsite open space easement over the RPO wetland, and breeding season avoidance. The GPU EIR identified these mitigation measures as Bio-1.5, Bio-1.6, Bio-1.7, and Bio-2.3.

- 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 MSCP maps nor is it in an area considered regionally important for wildlife dispersal. The site would not assist in local wildlife movement as it lacks connecting vegetation and visual continuity with other potential habitat areas in the general project vicinity. As detailed in Section 4(a), any connecting jurisdictional waters and wetland features will be dedicated within an on-site open space easement.

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

- 4(e) The GPU EIR concluded this impact to be less than significant. The project is consistent with the MSCP, Biological Mitigation Ordinance, and Resource Protection Ordinance (RPO) with the implementation of mitigation. MSCP Findings dated April 15, 2026 have been prepared for the project and will be taken to a future decision-maker upon final review and decision of the project. The project will not conflict with the provisions of any adopted Habitat Conservation Plan, Natural Communities Conservation Plan, other approved local, regional or state habitat conservation plan or any other local policies or ordinances that protect biological resources.

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 within the GPU EIR (Bio-1.5, Bio-1.6, Bio-1.7, and Bio-2.3) would be applied to the project. The mitigation measures, as detailed above, require application of the Biological Resources Guidelines for Determining Significance, the Resource Protection Ordinance and other ordinances related to protecting biological resources, and maintenance of wetlands.

5. Cultural Resources

Would the project:

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
a) Cause a substantial adverse change in the significance of a historical resource as defined in 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Directly or indirectly destroy a unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Directly or indirectly destroy a unique paleontological resource or site?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion

5(a) The GPU EIR concluded this impact to be less than significant with mitigation. Based on review of historical imagery and permit history, the project site does not contain a historical resource. The project site contains an existing residential dwelling that was substantially modified in the mid-2000s. The project site contains additional accessory structures that will either be permitted as a condition of approval of the project or removed. The existing workshop that is proposed to be converted and retrofitted to a dwelling unit was constructed in the late 2000s/early 2010s. Therefore, the project will not result in a change or removal of a historical resource.

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

5(b) The GPU EIR concluded this impact to be less than significant with mitigation. Permit history, previous surveys, and historical imagery were reviewed for evaluating potential impacts associated with Cultural and Tribal Cultural Resources associated with the project. The project consists of a Tentative Parcel Map to subdivide an existing parcel that

is developed with a residential structure and two driveways into three residential parcels. Earthwork and ground disturbing activities associated with the project would be anticipated to occur within previously developed and graded areas and during construction of any future residences associated with the project. Additionally, the project would require extensions of water lines within existing constructed road right-of-way of Los Coches Road and Via Diego. The project includes dedication of an open space easement over the on-site floodway/floodplain, wetland, and Los Coches Creek. As a precautionary measure for any inadvertent discoveries and consistent with General Plan EIR Mitigation Measures Cul-2.5 and Cul-4.1, the project will still be conditioned to include Archaeological and Tribal Monitoring, as well as a Cultural Resources Treatment Agreement and Preservation Plan throughout any activities that would require a grading permit. Additionally, the project is required to conform with Grading Ordinance Sections 87.429 and 87.430 which requires grading operations to be suspended in the event that resources are encountered and a County Official shall be informed to evaluate potentially significant resources. These conditions and measures for the project would be anticipated to be implemented in the event that a grading permit is required for the project or if any utility line improvements require construction in native soils or outside existing developed road right-of-way.

Consistent with the GPU EIR, potential impacts to cultural resources would be mitigated through ordinance compliance and through compliance with the County's Guidelines for Significance—Cultural Resources if resources are encountered. The GPU EIR identified these mitigation measures as Cul-2.5. Implementation of mitigation measure Cul-2.2, Cul-2.4, Cul-2.5, Cul-2.6, and Cul-4.1 in the GPU EIR, requiring archeological and native American monitoring, would reduce impacts to archeological resources to a less than significant level. Additional information related to tribal coordination is included in Section 18.

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

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

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

- 5(d) The GPU EIR concluded this impact to be less than significant with mitigation. A review of the County's Paleontological Resources Maps and data on San Diego County's geologic formations indicates that the project is located on geological formations that do not contain unique paleontological resources. The project is required to conform with Grading Ordinance Sections 87.429 and 87.430 which requires grading operations to be suspended in the event that resources are encountered and a County Official shall be informed to evaluate potentially significant resources. The project site contains an existing residence and accessory structures. The project consists of minimal amounts of grading for minor on-site access improvements and future construction of utility lines in adjacent

road right-of-way. All construction associated with the project is anticipated to occur in areas that have been previously developed such as Los Coches Road or on-site adjacent to Los Coches Road.

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

- 5(e) The GPU EIR concluded this impact to be less than significant with mitigation. The project is required to conform with Grading Ordinance Sections 87.429 and 87.430 which requires grading operations to be suspended in the event that resources are encountered and a County Official shall be informed to evaluate potentially significant resources. Project impacts would be less than significant.

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

Conclusion

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

1. No peculiar impacts to the project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. Feasible mitigation measures contained within the GPU EIR (Cul-2.2, Cul-2.4, Cul-2.5, Cul-2.6, and Cul-4.1) would be applied to the project. These mitigation measures address tribal coordination and coordination with agencies and organizations to evaluate and review records for potential tribal cultural resources as well as development and use of regulations and procedures in the event that human remains are discovered.

6. Energy Use

Would the project:

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion

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

The following responses are based on the Greenhouse Gas Screening Letter prepared by Ldn Consulting, Inc., dated July 14, 2024.

- 6(a) The project would increase the demand for electricity at the project site, and gasoline consumption in the project site during construction and operation relative to existing conditions. CEQA requires mitigation measures to reduce “wasteful, inefficient and unnecessary” energy usages (California Public Resources Code §21100(b)(3)). Neither the law nor the CEQA Guidelines establish criteria that define wasteful, inefficient, or unnecessary use. Compliance with the California Code of Regulations, Title 24, Part 6, Building Code, would result in highly energy-efficient buildings. However, compliance with building codes does not adequately address all potential energy impacts during construction and operation. It can be expected that energy consumption, outside the California Building Code regulations, would occur through the transport of construction materials to and from the site during the construction phase, and the use of vehicles and consumption of energy by occupants.

During the grading and construction phases of the project, the primary energy source utilized would be petroleum from construction equipment and vehicle trips. To a lesser extent, electricity would also be consumed for the temporary electric power for as necessary lighting and electronic equipment. Activities including electricity would be temporary and negligible; therefore, electricity use during grading and construction would not result in wasteful, inefficient, or unnecessary consumption of energy. Vehicle trips associated with the transportation of construction materials and construction workers commutes would also result in petroleum consumption, but to a lesser extent. Petroleum consumptions would be necessary for operation and maintenance of construction equipment and would not be beyond what is necessary for the project. The project consists of the subdivision of an existing residential parcel with an existing residential structure into three residential partials. At max buildout, the project will result in two additional primary dwelling units. Earthwork for the project consists of approximately 120 cubic yards of cut, 60 cubic yards of fill, and 60 cubic yards of export which is anticipated for minor on-site access improvements for the shared driveways between the properties as well as potential water line construction. One of the two additional dwelling units that are anticipated to be constructed on the site would consist of retrofitting and remodeling an existing workshop. By retrofitting and remodeling an existing structure, the project would not waste materials or energy. Due to the aforementioned factors and limited scope

of the project, the project's energy consumption during the grading and construction phase would not be considered wasteful, inefficient, or unnecessary.

Operation of the project would require the use of water for proposed and existing residential structures, electricity for residential structures, natural gas for the existing residential structure and workshop, and petroleum associated with vehicles used by residents of the project. Operations of the project would be typical of other residential uses in the area within the Single Family Residential (RS) zone. As detailed in Section 8, a Greenhouse Gas Screening Letter prepared by Ldn Consulting, Inc., dated July 14, 2024 was used to evaluate potential greenhouse gas emissions and impacts associated with the project which also included design features to address greenhouse emissions and energy. The project site contains an existing residence and would result in a net increase of two residential parcels. The existing residence is permitted and is proposed to remain. The existing residence contains natural gas infrastructure that will remain following implementation of the project. Both the existing residence and workshop contain roof mount photovoltaic or solar panels. Current building code requirements require construction of new residential structures to include photovoltaic or solar panels and the two existing structures already contain photovoltaic or solar panels. The majority of emissions and petroleum uses associated with residential projects typically come from mobile sources or emissions associated with vehicles and trip lengths. The project is anticipated to generate 24 Average Daily Trips or ADT upon development of two additional residences on the property through construction of a new residence on Parcel 3 and conversion of the workshop to a residential structure. Due to the minimal amount of trips associated with the project, the project is not anticipated to generate a substantial amount of emissions associated with mobile sources. As detailed in the Greenhouse Gas Screening Letter, the project will include project design features to address greenhouse gas emissions that also address energy. These measures include installing enough solar on the roof of the new structure at Parcel 3 to offset any potential gas or electrical energy estimated and ensuring the new residential unit will install wiring and infrastructure for Electrical Vehicle Supply Equipment (EVSE) to ensure the project will assist in reducing emissions from vehicles. The project will install an extension of water lines upon construction of additional residential units within the development that will reduce reliance on groundwater and result in increasing water efficiency within the development area. The project does not include wasteful structures or decorative features such as a pond that could utilize resources beyond the minimum amount as necessary as it consists of three residential structures at max buildout. The project includes retrofitting and reusing existing structures that have existing solar and photovoltaic systems in order to not be wasteful. Over the lifetime of the proposed Project, fuel efficiency of vehicles is expected to increase as older vehicles are replaced with newer, more efficient models. As such, the amount of petroleum consumed as a result of vehicle trips to and from the project site during operation would decrease over time. State and Federal regulations regarding standards for vehicles (e.g., Advanced Clean Cars Program, CAFÉ Standards) are designed to reduce wasteful, unnecessary, and inefficient use of fuel. The coupling of various State policies and regulations would result in the deployment of electric vehicles (EVs) which would be powered by an increasingly renewable electrical grid. Due to the aforementioned factors and limited scope of the project, the project's energy consumption at max buildout and operations would not be considered wasteful, inefficient, or unnecessary.

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

unnecessary consumption of energy resources, as specified within Appendix G of the CEQA Guidelines.

- 6(b) The applicable state plans that address renewable energy and energy efficiency are 2022 CALGreen, the 2022 Energy Code, and the Renewables Portfolio Standard (RPS). As discussed above in Section 6(a), the project would be required at a minimum to meet the mandatory energy requirements of the Energy Code and CALGreen in effect at the time of development. New construction and major renovations must demonstrate their compliance with the current Energy Code and CALGreen through submittal and approval of a Title 24 Compliance Report to the local building permit review authority and the California Energy Commission. The RPS promotes diversification of the state's electricity supply and decreased reliance on fossil fuel energy sources. The project would be served by San Diego Gas and Electric (SDG&E), who, under Senate Bill (SB) 350 (2015), is required to achieve a renewable energy mix goal of 60 percent by the year 2030. Based on the latest report to the legislature, SDG&E has obtained 59 percent renewables as of 2022 (California Public Utilities Commission 2023). Implementation of the project would not interfere with SDG&E's progress towards achieving RPS goals. Therefore, the project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency, and impacts would be less than significant.

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

Conclusion

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

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

7. Geology and Soils

Would the project:

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

Discussion

7(a)(i) The GPU EIR concluded this impact to be less than significant. The project is not located in a fault rupture hazard zone identified by the Alquist-Priolo Earthquake Fault Zoning Act, Special Publication 42, Revised 1997, Fault-Rupture Hazards Zones in California, nor is it located within a known Active Fault Near-Source Zone. The County Guidelines for Determining Significance for Geologic Hazards consider a project to have a potentially significant impact if the project proposes any building or structure to be used for human occupancy over or within 50 feet of the trace of an Alquist-Priolo fault or County Special Study Zone Fault. The project site is located approximately 3 miles north of the nearest Alquist-Priolo Fault Zone. Additionally, construction in accordance with the California Building Code Seismic Requirements would be required prior to the issue of a building permit. Any future or proposed construction would be required to comply with applicable building codes and seismic safety standards.

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

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

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

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

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

- 7(a)(iv) The GPU EIR concluded this impact to be less than significant. The site is identified as generally susceptible for the Landslide Susceptibility Area. Landslide Susceptibility Areas were developed based on landslide risk profiles included in the Multi-Jurisdictional Hazard Mitigation Plan, San Diego, CA (URS, 2004). Landslide risk areas from this plan were based on data including steep slopes (greater than 25%); soil series data (SANDAG based on USGS 1970s series); soil-slip susceptibility from USGS; and Landslide Hazard Zone Maps (limited to western portion of the County) developed by the California Department of Conservation Division of Mines and Geology (DMG). Based on the flat topography of the site, potential hazards associated with landslides are less than significant. The project site contains an existing residence and accessory structures. The project consists of minimal amounts of grading for minor on-site access improvements and future construction of utility lines in adjacent road right-of-way. Construction on steep slopes or areas that are typical of landslides are not proposed as part of the project. As previously discussed, the GPU EIR determined less than significant impacts from exposure to seismic-related hazards and soil stability. Therefore, project impacts would be less than significant.

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

- 7(b) The GPU EIR concluded this impact to be less than significant. The project would not result in substantial soil erosion or the loss of topsoil because the project would be required to comply with the County's Watershed Protection, Stormwater Management, and Discharge Ordinance. Compliance with these ordinances would ensure that the project would not result in any unprotected erodible soils, would not substantially alter existing drainage patterns, and would not develop on steep slopes. The areas of the project site that could be developed with a residential structure following completion of the subdivision contain soils described as Vista coarse sandy loam soils that have an erodibility rating of moderate. The project would be required to comply with Air Pollution Control District regulations during construction to minimize loss of topsoil and reduce fugitive dust such as utilizing a water truck. Additionally, the project would be required to implement Best Management Practices (BMPs) per the Standard Development Project Storm Water Quality Management Plan (SWQMP) during any construction associated with the project. Therefore, project impacts would be less than significant.

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

- 7(c) The GPU EIR concluded this impact to be less than significant. Landslide Susceptibility Areas were discussed in response (a)(iv). Lateral spreading is a principal effect from liquefaction which was discussed in response 7(a)(iii). As discussed in response 7(a)(iii), the project site is not located within a "Potential Liquefaction Area" as identified in the County Guidelines for Determining Significance for Geologic Hazards. Subsidence and collapse may be caused by unstable geological structures or conditions. As stated in Section 7(a), impacts to the project site from rupture of a known earthquake fault and strong seismic ground shaking or seismic-related ground failure would be unlikely to occur due to compliance with building code standards. Therefore, on-site geological formations are not expected to be unstable or become unstable as a result of the project, and impacts would be less than significant.

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

- 7(d) The GPU EIR determined impacts from expansive soils to be less than significant. The project is not underlain by expansive soils. In addition, the Project would not result in a significant impact because compliance with the Building Code, preparation of a Soils Engineering Report, and implementation of standard engineering techniques would ensure structural safety. According to the Soil Survey of San Diego County, the project is underlain by Vista coarse sandy loam, 15 to 30 percent slopes and Tujunga sand, 0 to 5 percent slopes and is not in an area to have expansive soils. Furthermore, the project would comply with the California Building Code and County Grading Code and adhere to the recommendations provided in the Geotechnical Investigation as a condition of approval to ensure geologic stability at the project site.

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

- 7(e) The GPU EIR concluded this impact to be less than significant. The project site would rely on public water and sewer for the disposal of wastewater and does not include construction of septic tanks or alternative wastewater disposal systems. As such, the project would not place septic tanks or alternative wastewater disposal systems on soils incapable of adequately supporting the tanks or system. As such, the project would not place septic tanks or alternative wastewater disposal systems on soils incapable of adequately supporting the tanks or system.

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

Conclusion

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

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

8. Greenhouse Gas Emissions

Would the project:

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

Discussion

The following responses are based on the Greenhouse Gas Screening Letter prepared by Ldn Consulting, Inc., dated July 14, 2024.

- 8(a) The GPU EIR concluded this impact to be less than significant with mitigation. Specifically, the GPU directed preparation of a County Climate Action Plan (CAP) with reduction targets; development of regulations to encourage energy efficient building design and construction; and development of regulations that encourage energy recovery and renewable energy facilities, among other actions. These planning and regulatory efforts are intended to ensure that actions of the County do not impede AB 32 and SB 375 mandates. As such, on February 14, 2018, the County Board of Supervisors (Board) adopted a CAP. On September 30, 2020, the Board voted to set aside its approval of the County's 2018 CAP and related actions because the Final Supplemental EIR was found to be out of compliance with CEQA. As a result, the County has developed a new CAP that was adopted in September of 2024. The CAP implements climate actions that reduce GHG emissions and establish actions to achieve a goal of net zero carbon emissions by 2045. The CAP establishes emission reduction targets of 43.6 percent emissions reductions below 2019 levels by 2030 and 85.4 percent below 2019 levels by 2045. This CAP sets GHG reduction targets and a net zero goal in alignment with the 2022 Scoping Plan that was adopted in December 2022. The 2022 Scoping Plan lays out a path to achieve statewide targets for carbon neutrality and reduce anthropogenic GHG emissions by 85 percent below 1990 levels no later than 2045, as directed by AB 1279. The County's CAP has been prepared in accordance with CEQA Guidelines §15183.5, which allows for public agencies to analyze and mitigate GHG emissions as part of a larger "plan for the reduction of greenhouse gases."

The County of San Diego Board of Supervisors adopted a new CAP on September 11, 2024. The Draft Supplemental Environmental Impact Report and Draft Climate Action Plan were circulated for public review at the end of 2023 and the beginning of 2024. Due to the absence of an adopted CAP when the project was submitted with a complete application in 2023, compliance with the CAP was not utilized as the threshold in determining potential greenhouse gas (GHG) emission impacts. In accordance with Section 15064, a project specific threshold was utilized through consistency with the 2022 CARB Scoping Plan.

A Greenhouse Gas Screening Letter prepared by Ldn Consulting, Inc., dated July 14, 2024 was used to evaluate potential greenhouse gas emissions and impacts associated with the project. The 2022 CARB Scoping Plan identifies three priority areas that local jurisdictions should prioritize when creating a CAP and implementing sustainability measures associated with projects. The three priority areas are: 1. Transportation Electrification 2. VMT Reduction and 3. Building Decarbonization. The project site contains an existing residence and would result in a net increase of two residential parcels. The existing residence is permitted and is proposed to remain. The existing residence contains natural gas infrastructure that will remain following implementation of the project. Both the existing residence and workshop contain roof mount photovoltaic or solar panels. Current building code requirements require construction of new residential structures to include photovoltaic or solar panels and the two existing structures already contain photovoltaic or solar panels. The majority of emissions associated with residential projects typically come from mobile sources or emissions associated with vehicles and trip lengths. The project is anticipated to generate 24 Average Daily Trips or ADT upon development of two additional residences on the property through construction of a new residence on Parcel 3 and conversion of the workshop to a residential structure. Due to the minimal amount of

trips associated with the project, the project is not anticipated to generate a substantial amount of emissions associated with mobile sources. As detailed in the Greenhouse Gas Screening Letter, the project will include project design features to address greenhouse gas emissions. These measures include installing enough solar on the roof of the new structure at Parcel 3 to offset any potential gas or electrical energy estimated and ensuring the new residential unit will install wiring and infrastructure for Electrical Vehicle Supply Equipment (EVSE) to ensure the project will assist in reducing emissions from vehicles. Although it isn't evaluated in the Greenhouse Gas Screening Letter, it should be noted that the project will install an extension of water lines upon construction of additional residential units within the development that will reduce reliance on groundwater and result in increasing water efficiency within the development area. Additionally, the project will result in dedication of a biological open space easement over an adjacent floodway/floodplain area of Los Coches Creek that will result in preservation of trees on the project site. The project is estimated to generate approximately 18.07 Metric Tons of Carbon Dioxide Equivalent (MT CO₂e) per year after the project is fully operational at max buildout. Due to the limited scope of the project, the existing structures and infrastructure, the minimal amount of emissions and trips associated with the project, the project's consistency with the 2022 CARB Scoping Plan given the existing circumstances of the site, and the project design features, the project will not generate greenhouse gas emissions that will have a significant impact on the environment.

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

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

Executive Orders S-3-05 and B-30-15 established GHG emission reduction targets for the state, and AB 32 launched the CARB Climate Change Scoping Plan that outlined the reduction measures needed to reach the 2020 target, which the state has achieved. As required by SB 32, CARB's 2017 Scoping Plan outlines reduction measures needed to achieve the interim 2030 target. AB 1279, the California Climate Crisis Act, codified the carbon neutrality target as 85 percent below 1990 levels by 2045. The 2022 Scoping Plan was adopted in December 2022. The 2022 Scoping Plan lays out a path to achieve targets for carbon neutrality and reduce anthropogenic GHG emissions by 85 percent below 1990 levels no later than 2045, as directed by AB 1279. As detailed above in Section 8(a), the project will not be in conflict an applicable plan or policy and would be consistent with the 2022 CARB Scoping Plan based on the scope and existing circumstances associated with the project.

The project site is subject to the Village Residential (VR-4.3) Land Use Designation and the Single Family Residential (RS) Zoning Use Regulation. The current land use designation of Village Residential (VR-4.3) allows for 4.3 dwelling units per acre. The project site is 2.65 acres and the site has an allowable density of 11 dwelling units. The project consists of a Tentative Parcel Map that will have a maximum density of three primary dwelling units at max buildout. The proposed use is consistent with the applicable zoning use regulation and General Plan Land Use Designation, and no variances, including for setbacks, are requested. Through its goals, policies, and land use designations, the County's General Plan aims to reduce County-wide GHG emissions. The project was also evaluated for consistency with the SANDAG Regional Transportation

Plan and Sustainable Communities Strategy that demonstrate how the region would meet its transportation-related GHG reduction goals. The growth projections used in San Diego Forward: The 2021 Regional Plan (San Diego Forward) are based on population, vehicle trends, and land use plans developed in general plans. As such, projects that propose development that is consistent with their respective general plan land use designations would be consistent with the growth projections in San Diego Forward. Therefore, because the project development is consistent with the General Plan, it is correspondingly consistent with San Diego Forward and its goals for reducing GHG emissions on a regional level. Thus, the project would not conflict with any applicable plan, policy or regulation adopted for the purpose of reducing emissions of GHG emissions.

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

Conclusion

With regard to the issue area of Greenhouse Gas Emissions, the following findings can be made:

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

9. Hazards and Hazardous Materials

Would the project:

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
a) Create a significant hazard to the public or the environment through the routine transport, storage, use, or disposal of hazardous materials or wastes or through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
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 concluded this impact to be less than significant.

Construction

The project includes limited construction related to utility line extensions at the time construction of additional residential units on the property. Construction associated with the project would be typical of the construction of two residential dwelling units and construction of utility lines in adjacent road right-of-way. During construction of the project, potentially hazardous materials could be handled on the project site. These materials would include gasoline, diesel fuel, lubricants, and other petroleum-based products required to operate and maintain construction equipment as well as specific materials for building construction, such as asphalt and concrete. Handling of these potentially hazardous materials would be temporary and would coincide with the short-term construction phase of the project. As required by California Health and Safety Code, and Titles 24 (Fire) and 22 (Hazardous Waste Management) of the California Code of Regulations, hazardous materials would be stored in designated areas away from environmentally sensitive areas in quantities that would not pose significant hazard to the public in the event of a release.

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

Operation

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

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

- 9(b) The GPU EIR concluded this impact to be less than significant. The nearest school to the project site is Lakeview Elementary School, which is located directly northeast of the project site. The nearest elementary is located approximately a half of a mile away from the project. The project would not emit hazardous emissions, and the transport and handling of minor amounts of hazardous materials during construction and operation would comply with all applicable federal, state, and local regulations that control hazardous material handling. The project consists of residential uses, which do not involve the routine use, storage, or transport of hazardous or acutely hazardous materials, substances, or waste. In the event that future demolition or renovation is proposed, the project would be required to comply with applicable regulations for lead and asbestos testing and demolition permits. Any unpermitted structures on the property are required to be removed or obtain an applicable building permit. Accordingly, the project would not emit hazardous emissions or handle hazardous materials within one-quarter mile of an existing or proposed school. Furthermore, the project is required to comply with applicable regulations pertaining to hazardous waste to ensure that impacts related to hazardous emissions and schools are less than significant.

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

- 9(c) The GPU EIR concluded this impact to be less than significant. Based on historic imagery, review of previous permits, and review of applicable databases, the project is not proposed on a site that has been known to release hazardous materials. The nearest case identified on GeoTracker is located over a half of a mile southwest of the project site for potential

gasoline spills. The case has since been closed. The project does not propose 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. Therefore, the project site is not located on a list of hazardous materials sites compiled pursuant to Government Code §65962.5.

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

- 9(d) The GPU EIR concluded this impact to be less than significant with mitigation because portions of the County are located within an Airport Land Use Compatibility Plan. For those projects, mitigation measures would be required consistent with the GPU Mitigation Framework. The nearest airport to the project site is Gillespie Field, located over 3 miles southwest of the project site. The project is not located within the Gillespie Field Airport Land Use Compatibility Plan or Airport Safety Zones. Because the project site is not located within a safety zone or noise exposure zone identified in the nearest Airport Land Use Compatibility Plan, the project would not result in a safety hazard or excessive noise for people residing or working in the project area. No impact would occur.

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

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

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

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

(i) Operational Area Emergency Plan and Multi-Jurisdictional Hazard Mitigation Plan: The Operational Area Emergency Plan is a comprehensive emergency plan that defines responsibilities, establishes an emergency organization, defines lines of communications, and is designed to be part of the statewide Standardized Emergency Management System. The Operational Area Emergency Plan provides guidance for emergency planning and requires subsequent plans to be established by each jurisdiction that has responsibilities in a disaster situation. The Multi-Jurisdictional Hazard Mitigation Plan

includes an overview of the risk assessment process, identifies hazards present in the jurisdiction, hazard profiles, and vulnerability assessments. The plan also identifies goals, objectives and actions for each jurisdiction in the County of San Diego, including all cities and the County unincorporated areas. The project would not interfere with this plan because it would not prohibit subsequent plans from being established or prevent the goals and objectives of existing plans from being carried out. Therefore, no new impacts would occur.

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

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

(iv) Emergency Water Contingencies Annex and Energy Shortage Response Plan: The project would not alter major water or energy supply infrastructure that could interfere with the plan.

(v) Dam Evacuation Plan: The Project site is not located within an identified dam inundation zone. Additionally, the development would not constitute a "Unique Institution" such as a hospital, school, or retirement home pursuant to the Office of Emergency Services included within the County Guidelines for Determining Significance, Emergency Response Plans

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

- 9(g) The GPU EIR concluded this impact to be significant and unavoidable. The project is within a very high fire hazard severity zone but not in the Urban-Wildland Interface Zone. The project site is developed with existing residential structures and is located directly adjacent to Los Coches Road. Surrounding properties contain residential structures as well as a church. The project site contains a portion of Los Coches Creek which runs along the northwestern portion of the project site. The project includes dedication of an open space easement over the on-site wetlands and Los Coches Creek. No structures will be permitted within 50 feet of Los Coches Creek and the identified RPO wetland. Additionally, the open space easement will be protected and identified by open space fencing and signage. An approximately 30-foot limited building zone will also be located adjacent to the limits of the open space easement and fencing in order to prevent construction of structures that would require fuel-modification and fuel management into the open space easement. As detailed in the Fire Protection Plan prepared for the project, the project site contains existing slopes and will require a minimum setback of 15 feet from the top of slope and two story residences shall be set back from the slopes by a minimum of 30 feet. The existing workshop that is planned to be converted to a residential structure will require retrofitting the structure and permitting using building materials approved by the Lakeside Fire Protection District. The Fire Protection Plan identifies that no structure can be permitted on the property that would require fuel modification into the adjacent open space easement. The proposed open space easement will be maintained and allow hand

clearing upon coordination with the Lakeside Fire Protection District and removal of dead foliage and leaves in accordance with the MOU between applicable wildlife agencies and San Diego County Fire Districts in order to allow for reduction of fuel risks while maintaining the biological function of the open space easement. The three residential lots will require dedication of on-site reciprocal access easements which will allow the three parcels to share access across the three parcels. Minimal access improvements on-site would be required for the shared access. No frontage improvements are proposed along Los Coches Road and two existing driveways will be used for access to the property. The project consists of residential structures and uses which do not typically include storage of hazardous flammable materials that are typically associated with commercial or industrial uses. Furthermore, implementation of fire safety standards would occur during the building permit process and is consistent with GPU EIR mitigation measure Haz-4.3. Therefore, the project would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires, and impacts would be less than significant.

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

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

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

Conclusion

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

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

10. Hydrology and Water Quality

Would the project:

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

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
k) Expose people or structures to a significant risk of loss, injury or death involving flooding?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
m) Inundation by seiche, tsunami, or mudflow?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion

The following responses are based on the Storm Water Quality Management Plan prepared by May Engineering and Surveying dated March 2026 and the Drainage Certification Letter by May Engineering and Surveying dated February 2026.

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

As determined in the SWQMP, and consistent with GPU EIR mitigation measures (Hyd-1.2 through Hyd-1.5) and GPU Policy 6.5, the project includes a combination of BMPs to reduce impacts associated with water quality standards. The project consists of minimal amounts of grading for minor on-site access improvements and future construction of utility lines in adjacent road right-of-way. Any future development or construction associated with new residential structures for the project would include preparation of additional SWQMPs and documentation in compliance with stormwater standards. The project would include construction BMPs such as hydroseeding and fiber rolls. Additionally, the project will divert runoff to pervious areas of the project site and utilize sustainable landscaping. The SWQMP has been prepared in accordance with the County’s BMP Design Manual, which is a design manual for compliance with the County’s Watershed Protection Ordinance (§67.801 et seq.), and San Diego Region Order No. R9-2013-0001 Municipal Separate Storm Sewer System (MS4) Permit (2013) requirements for storm water management, as adopted by the Regional Water Quality Control Board (RWQCB) on May 8, 2013. The project’s conformance to the waste discharge requirements of both the CGP and MS4 storm water permits listed above ensures the project would not create cumulatively considerable water quality impacts and addresses human health and water quality concerns. Therefore, the project would not contribute to a cumulatively considerable impact to water quality from waste discharges.

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

10(b) The GPU EIR concluded this impact to be significant and unavoidable. The Project lies in the Coches hydrologic subareas (907.14, respectively), within the San Diego hydrologic

unit. According to the Clean Water Act Section 303(d) list, the Los Coches Creek in hydrologic subarea 907.14 is impaired for by nitrogen, phosphorous, and selenium. As the project site is not a tributary to any of these impaired water bodies, potential project-related impacts would be limited to runoff-related contributions of listed pollutants.

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

As previously discussed, the GPU EIR determined impacts to water quality standards and requirements significant and unavoidable. However, the project would have a less than significant impact on water quality standards and requirements with implementation of the BMPs described in the project-specific SWQMP, consistent with GPU EIR mitigation measures (Hyd-1.2 through Hyd-1.5) and GPU Policy 6.5. Therefore, the project would be consistent with the analysis in the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance other than the information identified in the GPU EIR.

- 10(c) The GPU EIR concluded this impact to be significant and unavoidable. As stated in responses 10(a) and 10(b) above, implementation of BMPs and compliance with required ordinances would ensure that project impacts are less than significant. As previously discussed, the GPU EIR determined significant and unavoidable impacts to water quality standards and requirements and groundwater supplies and recharge. However, the project would have a less than significant impact with mitigation to water quality standards and requirements and groundwater supplies and recharge (Hyd-1.2 through Hyd-1.5). Therefore, the project would be consistent with the analysis within the GPU EIR because it would not create new impacts, increase impacts, and there is no new information of substantial importance than identified within the GPU EIR.
- 10(d) The GPU EIR concluded this impact to be significant and unavoidable due to portions of the County which rely on groundwater. The project site contains an existing residential structure and a well that serves the structure. The project is within the Lakeside Water District and facilities are available to serve the property and resultant parcels. At the time of construction of new residential dwelling units on the property or if the existing residential structures request to connect to water service, the residential development will require extension of sewer lines to reach the property. The amount of impervious surface on-site as well as the pervious areas that would allow for groundwater recharge will remain unchanged, Therefore, the project would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level, and impacts would be less than significant.

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

- 10(e) The GPU EIR concluded this impact to be less than significant with mitigation. The project site contains mapped floodplains/floodways (Los Coches Creek) along the northwestern portion of the project site. The project includes the dedication of an open space easement which will cover the majority of the floodway/floodplain. No construction is proposed within any mapped floodplain or floodway. Construction associated with the project consists of minimal amounts of grading for minor on-site access improvements and future construction of utility lines in adjacent road right-of-way. A Drainage Certification Letter by May Engineering and Surveying dated February 2026 certifies that the drainage patterns on the project site will remain unchanged after implementation of the project. The SWQMP has been prepared in accordance with the County's BMP Design Manual, which is a design manual for compliance with the County's Watershed Protection Ordinance (§67.801 et seq.), and San Diego Region Order No. R9-2013-0001 MS4 Permit (2013) requirements for stormwater management, as adopted by the RWQCB on May 8, 2013. The project's conformance to the waste discharge requirements of both the CGP and MS4 storm water permits listed above ensures the project would not result in substantial erosion or siltation on- or off-site.

As previously discussed, the GPU EIR determined impacts related to erosion or siltation would be significant and unavoidable. However, the project would have a less than significant impact on erosion or siltation with the implementation of project BMPs, consistent with GPU EIR mitigation measures (Hyd-1.3, Hyd-1.5, Hyd-3.1 through Hyd-3.3, Hyd-6.1, and Hyd-8.2). Therefore, the project would be consistent with the analysis in the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance other than the information identified in the GPU EIR.

- 10(f) The GPU EIR concluded this impact to be less than significant with mitigation. Construction associated with the project consists of minimal amounts of grading for minor on-site access improvements and future construction of utility lines in adjacent road right-of-way. A Drainage Certification Letter by May Engineering and Surveying dated February 2026 certifies that the drainage patterns on the project site will remain unchanged after implementation of the project.

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

- 10(g) The GPU EIR concluded this impact to be less than significant with mitigation. The project consists of minimal amounts of grading for minor on-site access improvements and future construction of utility lines in adjacent road right-of-way. A Drainage Certification Letter by May Engineering and Surveying dated February 2026 certifies that the drainage patterns on the project site will remain unchanged after implementation of the project. Therefore, the project would not contribute runoff water that would exceed the capacity of the existing stormwater drainage system.

As previously discussed, the GPU EIR determined impacts to exceed capacity of stormwater systems to be less than significant with mitigation. Therefore, the project would be consistent with the analysis in the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance other than the information identified in the GPU EIR.

- 10(h) The GPU EIR concluded this impact to be significant and unavoidable. As stated in responses 10(a) and 10(b) above, implementation of BMPs and compliance with required ordinances would ensure that potential pollutants would be reduced to the maximum extent practicable. Therefore, the project would not provide substantial additional sources of polluted runoff.

As previously discussed, the GPU EIR determined impacts to water quality standards and requirements to be significant and unavoidable. The project would have a less than significant impact with regard to additional sources of polluted runoff with incorporation of design features and improvements consistent with GPU EIR mitigation measures (Hyd-1.2 through Hyd-1.5). Therefore, the project would be consistent with the analysis in the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance other than the information identified in the GPU EIR.

- 10(i) The GPU EIR concluded this impact to be less than significant with mitigation. The project site contains mapped floodplains/floodways along the northwestern portion of the project site. The project includes the dedication of an open space easement which will cover the majority of the floodway/floodplain. No construction is proposed within any mapped floodplain or floodway. Therefore, the project would not place housing within a County or federal floodplain or floodway.

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

- 10(j) The GPU EIR concluded this impact to be less than significant with mitigation. The project site contains mapped floodplains/floodways along the northwestern portion of the project site. The project includes the dedication of an open space easement which will cover the majority of the floodway/floodplain. No construction is proposed within any mapped floodplain or floodway. The project would therefore not place structures within a flood hazard area which would impede or redirect flood flows.

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

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

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

The project site is not within a Dam Inundation Zone (California Department of Water Resources 2025). Therefore, the project would not expose people or structures to a significant risk of loss, injury, or death involving flooding as a result of the failure of a levee or dam.

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

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

(i) Seiche: The project site is not located along the shoreline of a lake or reservoir.

(ii) Tsunami: The project site is not located in a tsunami hazard zone.

(iii) Mudflow: Mudflow is type of landslide. See response to question 6(a)(iv).

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

Conclusion

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

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

Manual/BMP Design Manual, Groundwater Ordinance, and Guidelines for Determining Significance for Hydrology and Water Quality.

11. Land Use and Planning

Would the project:

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
a) Physically divide an established community?	<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 is located within an urbanized environment with small pockets of undeveloped land. The project site is surrounded by single-family residential uses. The proposed single-family residential lots would be similar to the adjacent residential uses in the project vicinity. Similarly, the project would not alter the existing circulation network, and changes would be limited to minor on-site improvements and easements for shared driveways connecting to Los Coches Road. Additionally, buildout of this site was anticipated in the GPU EIR and GPU EIR mitigation measures Lan-1.1 through Lan-1.3 requiring coordination efforts for roadway widening and improvements to ensure that development of the site would not divide an established community. Therefore, the project would not physically divide an established community, and impacts would not be significant.

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

11(b) The GPU EIR concluded this impact to be less than significant. The project would not require a zone change or general plan amendment. The project site is subject to the Village Residential (VR-4.3) Land Use Designation and the Single Family Residential (RS) Zoning Use Regulation. The current land use designation of Village Residential (VR-4.3) allows for 4.3 dwelling units per acre. The project site is 2.65 acres and the site has an allowable density of 11 dwelling units. The project consists of a Tentative Parcel Map that will have a maximum density of three primary dwelling units at max buildout. The proposed use is consistent with the applicable zoning use regulation, and no variances, including for setbacks, are requested. All lots within the subdivision will be larger than the 10,000 square foot minimum lot size designation of the property. The project is also consistent with the goals and policies of the County General Plan, as well as the Lakeside Community Plan, as it maintains the existing development pattern and is compatible with surrounding land uses. Overall, the project would not conflict with any applicable land use plans,

policies, or regulations adopted for the purpose of avoiding or mitigating environmental effects. Therefore, the project would be consistent with the density established by the existing land use designation. The project would not conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect, including policies of the General Plan and Community Plan.

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

Conclusion

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

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

12. Mineral Resources

Would the project:

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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 not been classified by the California Department of Conservation – Division of Mines and Geology (Update of Mineral Land Classification: Aggregate Materials in the Western San Diego Production-Consumption Region, 1997) as an area for mineral resources. The project site is primarily

classified as developed with a residence and a drainage in the northwest portion of the project site in an area surrounded by residential zoning. A future mining operation at the Project site would likely create a significant impact to neighboring properties for issues such as noise, air quality, traffic, and possibly other impacts. Additionally, the Project site is less than 5 acres and adjacent to a mobility element road and residential uses and it would be unlikely to support a successful mining operation. The project site would be difficult to permit the establishing of a new mine on the property. 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 not located in an Extractive Use Zone (S-82), nor does it have an Impact Sensitive Land Use Designation (24) with an Extractive Land Use Overlay (25). The Project site is not located in an area that has MRZ-2 designated lands, but the Project site is within 1,300 feet of lands designated as MRZ-2. There are no active mines on the project site. Therefore, no potentially significant loss of availability of a known mineral resource of locally important mineral resource recovery (extraction) site delineated on a local general plan, specific plan, or other land use plan would occur as a result of this project. Therefore, the project would be consistent with the analysis in the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance other than the information identified in the GPU EIR.

Conclusion

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

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

13. Noise

Would the project result in:

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion

The following responses are based on the Noise Analysis titled Acoustical Analysis Report for Los Coches TPM No. 21313 by Eilar Associates, Inc., dated May 23, 2024

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

General Plan – Noise Element: The County of San Diego General Plan, Noise Element, Tables N-1 and N-2 addresses noise sensitive areas and requires an acoustical study to be prepared for any use that may expose noise sensitive areas to noise in excess of a Community Noise Equivalent Level (CNEL) of 60 dBA for single residences (including senior housing, convalescent homes), and 65 dBA CNEL for multi-family residences (including mixed-use commercial/residential). Moreover, if the project is located in an area in excess of 60 dBA CNEL or 65 dBA CNEL, modifications must be made to the project to reduce noise levels. Noise sensitive areas include residences, hospitals, schools, libraries or similar facilities as mentioned within Tables N-1 and N-2. Based on a review of the County’s noise contour maps, the project is located within noise contours identified in the

noise element of the General Plan ranging 60 CNEL or more due to the proximity of the project site to Los Coches Road. As detailed in the Noise Analysis by Eilar Associates, Inc., dated May 2024, the existing ambient noise levels range from 57 CNEL to 71 CNEL. The project will require standard noise measures such as a noise easement which will ensure that future interior noise levels of the development are consistent with 45 dBA levels consistent with the General Plan Noise Element and Mitigation Measure Noi-1 of the General Plan EIR. A future noise report will be prepared during the building permit and construction drawing process with building material specifications to ensure that the project will meet the interior 45 dBA noise level. The project is anticipated to generate 24 Average Daily Trips (ADT). Noise generated as a result of traffic by the project will be negligible and is not anticipated to be discernible compared to the existing noise generated by traffic along Los Coches Road and the existing operations of the project.

Typical construction activities would not exceed the County of San Diego temporary construction noise limit of 75 dBA at adjacent property lines during the construction activity. General good practice measures including reasonable maintenance of equipment, conservative planning of simultaneous equipment operation, and using equipment with effective mufflers would ensure that noise levels remain below the County of San Diego construction noise limits. Equipment operation would be limited to the County of San Diego's allowable hours of operation (Monday through Saturday 7 a.m. to 7 p.m.). With these recommendations, it is expected that construction equipment noise levels will be at or below an average eight-hour equivalent noise level of 75 dBA, in compliance with County of San Diego regulations. Additionally, the project consists of minimal amounts of grading for minor on-site access improvements and future construction of utility lines in adjacent road right-of-way. Therefore, the project does not propose any noise sensitive land uses and would not expose any existing noise sensitive receptors to noise levels that exceeds the County's noise standards and standards identified in the Noise Element of the General Plan.

Noise Ordinance – Section 36-404: Non-transportation noise generated by the project is not expected to exceed the standards of the Noise Ordinance at or beyond the project's property line. The site as well as the majority of properties adjacent to the project site are subject to the Single Family Residential (RS) land use regulation is located directly west of the site and is subject to the sound limit of 50 dBA daytime and 45 dBA nighttime. The property north of the project site is subject to the Rural Residential (RR) land use regulation which is also subject to the sound limit of 50 dBA daytime and 45 dBA nighttime. Using the most restrictive zoning use regulation related to noise adjacent to the site as the Single-Family Residential (RS) or Rural Residential (RR) zones, the RS and RR zoning use regulations have a 1-hour average sound limit of 45 between 10 p.m. and 7 a.m. and 50 dB between 7 a.m. and 10 p.m. The project consists of subdividing a single residential parcel with an existing residence into three residential parcels. Operations of the Project do not involve amplified music or noise producing equipment that would exceed applicable noise levels at the adjoining property line. The project does not involve any noise producing equipment that would exceed applicable noise levels at the adjoining property line. Therefore, the project complies with Section 36.404 of the Noise Ordinance.

Noise Ordinance – Section 36-410: The project will not generate construction noise in excess of Noise Ordinance standards. Construction operations will occur only during permitted hours of operation. The project does not propose the use of blasting during construction activities. Also, it is not anticipated that the project will require the operation of construction equipment in excess of an average sound level of 75 dB between the hours of 7 AM and 10 PM. The majority of grading associated with the project will be on-site for minor access changes or construction of utility lines primarily within adjacent road right-of-way. The project will also implement standard good practice recommendations that are conditions of all projects such as:

- a. Turn off equipment when not in use.
- b. Equipment used in construction should be maintained in proper operating condition, and all loads should be properly secured, to prevent rattling and banging.
- c. Use equipment with effective mufflers.
- d. Minimize the use of backup alarms.

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

- 13(b) The GPU EIR concluded this impact to be less than significant with mitigation. The project site and surrounding properties contain residential dwelling units and uses. The project is not located adjacent to uses that typically can generate vibration beyond levels of significance such as industrial uses or mines. Operation of the project would not generate groundborne noise or vibration as it consists of residential uses. The project includes minimal amounts of construction at maximum buildout consisting of the development of two primary dwelling units and extension of utility lines in adjacent road right-of-way.

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

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

As indicated in the response listed under Section 13(a), the project would not expose existing or planned noise sensitive areas in the vicinity to a substantial permanent increase in noise levels that exceed the allowable limits of any applicable noise standards. Also, the project is not expected to expose existing or planned noise sensitive areas to noise 10 dB CNEL over existing ambient noise levels.

As previously discussed, the GPU EIR determined impacts from a permanent increase in ambient noise levels to be significant and unavoidable. As the project would have a less than significant impact for the reasons detailed above, the project would be consistent with the analysis in the GPU EIR because it would not create new impacts or increase impacts,

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

- 13(d) The GPU EIR concluded this impact to be less than significant with mitigation. As indicated in the response listed under Section 13(a), the project does not involve any operational uses that may create substantial temporary or periodic increases in ambient noise levels in the project vicinity. In addition, general construction noise is not expected to exceed the construction noise limits of the County of San Diego Noise Ordinance (Section 36.409), which are derived from State regulations to address human health and quality of life concerns. Construction operations will occur only during permitted hours of operation. Also, the project will not operate construction equipment in excess of 75 dB for more than 8 hours during a 24-hour period. Therefore, the project would not result in a substantial temporary or periodic increase in existing ambient noise levels in the project vicinity.

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

- 13(e) The GPU EIR concluded this impact to be less than significant with mitigation. The project site is not within the boundaries of an Airport Land Use Plan and is not within two miles of a public-use airport or private airstrip. The nearest airport to the project site is Gillespie Field, located over 3 miles southwest of the project site. The project is not located within the Gillespie Field Airport Land Use Compatibility Plan or Airport Safety Zones. The project site is outside the noise contour for Gillespie Field Airport. As such, the project would not expose residents to excessive noise levels, and no impacts would occur. Therefore, the project would be consistent with the analysis in the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance other than the information identified in the GPU EIR.

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

Conclusion

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

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

analyses for any project proposed within noise contours as detailed in the General Plan in order to ensure noise levels are compliant with County standards.

14. Population and Housing

Would the project:

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion

14(a) The GPU EIR concluded this impact to be less than significant. A project could induce population growth in an area either directly, through the development of new residences or businesses, or indirectly, through the extension of roads or other infrastructure. The project site is subject to the Village Residential (VR-4.3) Land Use Designation and the Single Family Residential (RS) Zoning Use Regulation. The current land use designation of Village Residential (VR-4.3) allows for 4.3 dwelling units per acre. The project site is 2.65 acres and the site has an allowable density of 11 dwelling units. The project consists of a Tentative Parcel Map that will have a maximum density of three primary dwelling units at max buildout. Therefore, the project is consistent with the allowable density of the County of San Diego General Plan.

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

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

14(b) The GPU EIR concluded this impact to be less than significant. The project consists of a Tentative Parcel Map for a total of three residential lots on a site with an existing primary dwelling unit. The project site would only include a maximum of three primary dwellings if

all residential lots were developed. The existing residential dwelling will be retained, and no dwelling units are proposed to be demolished. Therefore, the project would not displace substantial numbers of existing housing and would instead increase housing within the City of Escondido. Impacts would be less than significant.

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

- 14(c) The GPU EIR concluded this impact to be less than significant. The project consists of a Tentative Parcel Map for a total of three residential lots on a site with an existing primary dwelling unit. The project site would only include a maximum of three primary dwellings if all residential lots were developed. The existing residential dwelling will be retained, and no dwelling units are proposed to be demolished. Therefore, the project would not displace substantial numbers of existing people and would instead increase housing within the City of Escondido. Impacts would be less than significant.

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

Conclusion

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

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

15. Public Services

Would the project:

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance service ratios for fire protection, police protection, schools, parks, or other public facilities?	<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 the exception of school services, which remained significant and unavoidable. The project consists of the subdivision of an existing residential parcel into three residential parcels. Based on service availability forms from the Lakeside Fire Protection District, the San Diego County Sanitation District (Lakeside), the Lakeside Union School District, the Grossmont Union High School District, and the Lakeside Water District dated 2022-2023, the project has adequate and available service for water, fire, school, and sewer services.

The project site is within the Lakeside Fire Protection District and the nearest service station is located approximately 2.2 miles away. Based on a review by County Staff of GIS Aerial Imagery and the Fire Service Availability Form, the site would have an Emergency Response Travel Time of 5 minutes, which meets the General Plan Safety Element 1 minute standard for lands designated as Village within the Village Regional Category.

As detailed on the school availability forms from the Lakeside Union School District and the Grossmont Union High School District, the project is located within the applicable school districts. School fees will be paid during the building permit process for any new units within the development.

The existing parcel is currently served by the San Diego County Sanitation District in the Lakeside service area as detailed on the service availability forms. All future building permits for new residential structures on the resultant parcels will require on-site sewer laterals and cleanouts to be reviewed and permitted during the building permit process.

The project site contains an existing residential structure and a well that serves the structure. The project is within the Lakeside Water District and facilities are available to serve the property and resultant parcels. At the time of construction of new residential dwelling units on the property or if the existing residential structures request to connect to water service, the residential development will require extension of sewer lines to reach the property. Existing Lakeside Water District water lines are located in Via Diego, directly southwest of the project site across Los Coches Road. As detailed on the service availability forms, the project will require an extension of 200 feet of water lines.

The project does not include construction of new or altered public service facilities including but not limited to fire protection facilities, sheriff facilities, schools, or parks in order to maintain acceptable service ratios, response times, or other performance objects for public services. The proposed development is consistent with the General Plan projections and Land Use regulations, therefore, service ratios for public services associated with the project were analyzed within the GPU EIR and the Project is not anticipated to require additional services. Based on the project's service availability forms, the project would not result in the need for significantly altered services or facilities. Therefore, the project would not result in the need for new or physically altered police protection facilities, and impacts would be less than significant.

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

Conclusion

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

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

16. Recreation

Would the project:

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion

- 16(a) The GPU EIR concluded this impact to be less than significant with mitigation. The project would accommodate population growth that is already anticipated within the County, and therefore would be consistent with planned housing growth under the County’s 2021-2029 6th Cycle Housing Element Update. Furthermore, the project would be subject to Park Land Dedication Ordinance fees associated with the Lakeside Community Planning Area for any new dwelling units constructed on the project site. The project includes a Tentative Parcel Map for a total of three residential lots on a site with an existing primary dwelling unit. The project site would only be subject to a maximum of three primary dwellings if all residential lots were developed. The project is not over 50 units which would require evaluation of public parkland dedication. As the project would have a less than significant impact for the reasons detailed above, the project would be consistent with the analysis within the GPU EIR because it would not create new impacts, increase impacts, and there is not new information of substantial importance compared to what is identified within the GPU EIR.

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

Conclusion

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

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

17. Transportation and Traffic

Would the project:

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
a) Conflict with an applicable plan, ordinance or policy establishing measures of the effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion

17(a) The GPU EIR concluded this impact to be significant and unavoidable. The project consists of a Tentative Parcel Map to subdivide a single parcel into three residential parcels. The project site includes an existing single-family residence that will be retained. In accordance with SANDAG’s Not So Brief Guide of Vehicular Traffic Generation Rates for the San Diego Region, the project will generate an additional 24 Average Daily Trips (ADT) at max buildout of the development if two primary dwelling units are developed. In accordance with the County of San Diego Guidelines for determining significance, the number of trips generated by the project is less than 200 trips or 20 peak hour trips and does not require preparation of a formal traffic analysis due to the minimal amount of trips generated by the project. The project would not create a conflict with any performance measures because with the addition of the minimal amount of project trips and is not anticipated to degrade surrounding roadways to below standards established in the GPU EIR. The County standard for the levels of service (LOS) on Mobility Element roads is LOS D. An objective of the GPU is to plan for growth while preserving the County’s environmental, cultural, and historical resources. Surrounding intersection and roadway segment operations will remain at acceptable LOS with construction of the project. The project would not result in a substantial increase in the number of vehicle trips, volume of capacity ratio on roads, or congestion at intersections in relation to existing conditions.

The project is located along Los Coches Road, a Mobility Element Road identified in the San Diego County General Plan. Access to the project and the three residential lots will

be provided by two existing driveways connecting to Los Coches Road. The three residential lots will require dedication of on-site reciprocal access easements which will allow the three parcels to share access across the three parcels. Minimal access improvements on-site would be required for the shared access. No frontage improvements are proposed along Los Coches Road. Due to the lack of improvements required for the project and minimal amount of trips, the project will not conflict with an applicable plan, ordinance, or policy related to transportation.

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

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

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

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

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

- **GPU MM Tra-1.3** is the implementation of County Public Road Standards during review of new development projects. Tra-1.3 also includes revision of the Public Road Standards to include a range of road types according to Regional Category context. Application of this measure will ensure that LOS standards are met when feasible and that appropriate road types are assigned based the specifics of the development.
- **GPU MM Tra-1.4** is the implementation, and revision as necessary, of the County Guidelines for Determining Significance for Transportation and Traffic to evaluate adverse environmental effects of projects and require mitigation when significant

impacts are identified. This measure will ensure that appropriate site design and mitigating measures are applied to minimize traffic increases and road deficiencies associated with future development under the General Plan Update.

- **GPU MM Tra-1.7** is the implementation of the San Diego County Transportation Impact Fee (TIF) Ordinance, which defrays the costs of constructing planned transportation facilities necessary to accommodate increased traffic generated by future development. This measure will help reduce financial barriers associated with accommodating increased traffic and/or meeting LOS standards.

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

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

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

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

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

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

- 17(c) The GPU EIR concluded this impact to be less than significant with mitigation. As discussed in Section 9(d), the project is not located within an Airport Land Use Compatibility Plan. The nearest airport to the project site is Gillespie Field, located over 3 miles southwest of the project site. The project is not located within the Gillespie Field Airport Land Use Compatibility Plan or Airport Safety Zones. Furthermore, the project does not propose the construction of any structure equal to or greater than 150 feet in height that would constitute a safety hazard to aircraft and/or operations from an airport or heliport. Therefore, the project would be consistent with the analysis in the GPU EIR because it would not increase impacts identified in the GPU EIR.

- 17(d) The GPU EIR concluded this impact to be significant and unavoidable. The project would not substantially alter traffic patterns, roadway design, place incompatible uses (e.g., farm equipment) on existing roadways, or create curves, slopes or walls which would impede adequate sight distance on a road. The private driveways would meet County standards and have been reviewed by the Lakeside Fire Protection District. The project would result in residential uses in an area surrounded by existing residential uses.

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 will not result in inadequate emergency access. The project will not be served by a dead-end road that exceeds the maximum cumulative length permitted by the San Diego County Consolidated Fire Code. The Lakeside Fire Protection District provides service to the site and the project meets the travel time requirement outlined in the Safety Element of the General Plan of 5 minutes. Access to the project site would be provided by two driveways that connect to Los Coches Road. In addition, consistent with GPU EIR mitigation measure Tra-4.2, the project would implement the County Building and Fire Codes to ensure emergency vehicle accessibility through the project site.

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

- 17(f) The GPU EIR concluded this impact to be less than significant with mitigation. The project is located along Los Coches Road, a Mobility Element Road identified in the San Diego County General Plan. Access to the project and the three residential lots will be provided

by two existing driveways connecting to Los Coches Road. The three residential lots will require dedication of on-site reciprocal access easements which will allow the three parcels to share access across the three parcels. Minimal access improvements on-site would be required for the shared access. No frontage improvements are proposed along Los Coches Road. Due to the lack of improvements required for the project and minimal amount of trips generated by the project, the project would not conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities.

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

Conclusion

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

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

18. Tribal Cultural Resources

Would the Project:

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

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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- i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of Historical Resources as defined in Public Resources Code §5020.1(k), or

- ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code §5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code §5024.1, the Lead Agency shall consider the significance of the resource to a California Native American tribe.

Discussion

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

18(a) Permit history, previous surveys, and historical imagery were reviewed for evaluating potential impacts associated with Cultural and Tribal Cultural Resources associated with the project. The project consists of a Tentative Parcel Map to subdivide an existing parcel that is developed with a residential structure and two driveways into three residential parcels. Earthwork and ground disturbing activities associated with the project would be anticipated to occur within previously developed and graded areas and during construction of any future residences associated with the project. Additionally, the project would require extensions of water lines within existing constructed road right-of-way of Los Coches Road and Via Diego. The project includes dedication of an open space easement over the on-site floodway/floodplain, wetland, and Los Coches Creek. As a precautionary measure for any inadvertent discoveries and consistent with General Plan EIR Mitigation Measures Cul-2.5 and Cul-4.1, the project will still be conditioned to include Archaeological and Tribal Monitoring, as well as a Cultural Resources Treatment Agreement and Preservation Plan throughout any activities that would require a grading permit. Additionally, the project is required to conform with Grading Ordinance Sections 87.429 and 87.430 which requires grading operations to be suspended in the event that resources are encountered and a County Official shall be informed to evaluate potentially significant resources. These conditions and measures for the project would be anticipated to be implemented in the event that a grading permit is required for the project or if any utility line improvements require construction in native soils or outside existing developed road right-of-way.

Consistent with General Plan EIR Mitigation Measures Cul 2.2, Cul-2.4, Cul-2.6, and Cul-4.1 and General Plan Policy-11.4 – Collaboration with Agencies and Jurisdictions, the County initiated coordination with California Native American tribes traditionally and culturally affiliated with the project site on November 30, 2023. Staff received general questions regarding the project. On December 12, 2023, the San Pasqual Band of Mission Indians requested to discuss the project. On August 21, 2024 and October 7, 2024, County staff requested to end coordination on the project with the San Pasqual Band of Mission Indians. On December 29, 2023, the Jamul Indian Village requested to discuss the project. On August 12, 2024, the Jamul Indian Village agreed to end coordination on the project. As of June 11, 2026, County staff have not received requests to further discuss the project.

No Tribal Cultural Resources were identified during discussions and coordination with the tribes. As such, there are no anticipated impacts to tribal cultural resources.

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

Conclusion

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

1. No peculiar impacts to the project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. Feasible mitigation measures contained within the GPU EIR (Cul-2.2, Cul-2.4, Cul-2.5, Cul-2.6, and Cul-4.1) would be applied to the project. These mitigation measures address tribal coordination and coordination with agencies and organizations to evaluate and review records for potential tribal cultural resources as well as development and use of regulations and procedures in the event that human remains are discovered.

19. Utilities and Service Systems

Would the project:

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
e) Result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project’s projected demand in addition to the provider’s existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) Be served by a landfill with sufficient permitted capacity to accommodate the project’s solid waste disposal needs?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
g) Comply with federal, state, and local statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion

19(a) The GPU EIR concluded this impact to be less than significant with mitigation. The project would discharge domestic waste to a community sewer system that is permitted to operate by the Regional Water Quality Control Board (RWQCB). A service availability form dated February 2023 identifies that the San Diego County Sanitation District in the Lakeside service area has adequate service to serve the project. The existing parcel is currently served by the San Diego County Sanitation District in the Lakeside service area as detailed on the service availability form. All future building permits for new residential structures on the resultant parcels will require on-site sewer laterals and cleanouts to be reviewed and permitted during the building permit process.

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

19(b) The GPU EIR concluded this impact to be less than significant with mitigation. The project would discharge domestic waste to a community sewer system that is permitted to operate by the Regional Water Quality Control Board (RWQCB). A service availability form dated February 2023 identifies that the San Diego County Sanitation District in the Lakeside service area has adequate service to serve the project. The existing parcel is currently served by the San Diego County Sanitation District in the Lakeside service area as detailed on the service availability form. All future building permits for new residential structures on the resultant parcels will require on-site sewer laterals and cleanouts to be reviewed and permitted during the building permit process. Therefore, the project would not require the construction of new wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.

The project site contains an existing residential structure and a well that serves the structure. The project is within the Lakeside Water District and facilities are available to serve the property and resultant parcels. At the time of construction of new residential dwelling units on the property or if the existing residential structures request to connect to water service, the residential development will require extension of sewer lines to reach the property. Existing Lakeside Water District water lines are located in Via Diego, directly

southwest of the project site across Los Coches Road. As detailed on the service availability forms, the project will require an extension of a minimum of 200 feet of water lines. The extension of water lines are expected to occur within existing road right-of way of Via Diego and Los Coches Road up to the edge of the property line. Therefore, the project would not require the construction of new water treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.

The GPU EIR determined impacts associated with new water and wastewater treatment facilities to be less than significant with mitigation. As the project would have a less than significant impact, the project would be consistent with the analysis in the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance other than the information identified in the GPU EIR.

- 19(c) The GPU EIR concluded this impact to be less than significant with mitigation. As discussed in Section 10, the project includes a stormwater management plan that includes a combination of BMPs to reduce impacts associated with water quality standards. The project consists of minimal amounts of grading for minor on-site access improvements and future construction of utility lines in adjacent road right-of-way. Any future development or construction associated with new residential structures for the project would include preparation of additional SWQMPs and documentation in compliance with stormwater standards. The project would include construction BMPs such as hydroseeding and fiber rolls. Additionally, the project will divert runoff to pervious areas of the project site and utilize sustainable landscaping. A Drainage Certification Letter by May Engineering and Surveying dated February 2026 certifies that the drainage patterns on the project site will remain unchanged after implementation of the project. Therefore, the project does not 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.

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

- 19(d) The GPU EIR concluded this impact to be significant and unavoidable. The project site contains an existing residential structure and a well that serves the structure. The project is within the Lakeside Water District and facilities are available to serve the property and resultant parcels. At the time of construction of new residential dwelling units on the property or if the existing residential structures request to connect to water service, the residential development will require extension of sewer lines to reach the property. Existing Lakeside Water District water lines are located in Via Diego, directly southwest of the project site across Los Coches Road. As detailed on the service availability forms, the project will require an extension of a minimum of 200 feet of water lines. As the project would have a less than significant impact, the project would be consistent with the analysis provided in the GPU EIR because it would not increase impacts identified in the GPU EIR.
- 19(e) The GPU EIR concluded this impact to be less than significant with mitigation. As detailed in Section 19(b), the project would discharge domestic waste to a community sewer system that is permitted to operate by the Regional Water Quality Control Board

(RWQCB). A service availability form dated February 2023 identifies that the San Diego County Sanitation District in the Lakeside service area has adequate service to serve the project. The existing parcel is currently served by the San Diego County Sanitation District in the Lakeside service area as detailed on the service availability form. All future building permits for new residential structures on the resultant parcels will require on-site sewer laterals and cleanouts to be reviewed and permitted during the building permit process. The project will not require future annexation actions at this time as it is within the applicable sewer district. As the project would have a less than significant impact for the reasons detailed above, the project would be consistent with the analysis in the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance other than the information identified in the GPU EIR.

19(f) The GPU EIR concluded this impact to be significant and unavoidable. All solid waste facilities, including landfills, require solid waste facility permits to operate. There are five, permitted active landfills in San Diego County with remaining capacity to adequately serve the project. The project is consistent with the land use designation and zoning for the project site. Therefore, the GPU EIR adequately anticipated and described the impacts of the project related to generation of solid waste. The project would be consistent with the analysis within the GPU EIR because it would not create new impacts, increase impacts, and there is not new information of substantial importance than identified within the GPU EIR.

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

Conclusion

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

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

20. Wildfire

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

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	<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 within the GPU EIR within Section 2.7, Hazards and Hazardous Materials. The guidelines for determining significance stated: the proposed General Plan Update would have a significant impact if it would expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands. In 2019, the issue of Wildfire was separated into its own section within Appendix G of the CEQA Guidelines to incorporate the four issue questions above. The GPU EIR did address these issues within the analysis; however, they were not called out as separate issue areas. Within the GPU EIR, the issue of Wildland Fires was determined to be significant and unavoidable.

The following responses are based on the Fire Protection Plan prepared by J. Charles Weber dated November 9, 2025.

20(a) The GPU EIR concluded this impact to be significant and unavoidable. The site is located within a very high fire hazard severity zone (FHSZ). The project site is within the Lakeside and is located approximately 2.2 miles from the nearest fire station as detailed on the fire service availability form for the project. Based on a review by County Staff of GIS Aerial Imagery and the Fire Service Availability Form dated July 2020, the site would have an Emergency Response Travel Time 5 minutes, which meets the 5-minute General Plan Safety Element standard for lands designated as Residential within the Village Regional Category. Access to the site will be provided by two existing driveways connecting to Los Coches Road. Therefore, the project would not interfere with an adopted emergency response plan or emergency evacuation plan, and impacts would be less than significant.

As previously stated, Wildfire was analyzed within the GPU EIR within Section 2.7, Hazards and Hazardous Materials, and was determined to be significant and unavoidable. As the project would have a less than significant impact for the reasons detailed above, the project would be consistent with the analysis within the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance other than the information identified in the GPU EIR.

- 20(b) The GPU EIR concluded this impact to be significant and unavoidable. The project is within a very high fire hazard severity zone but not in the Urban-Wildland Interface Zone. The project site is developed with existing residential structures and is located directly adjacent to Los Coches Road. Surrounding properties contain residential structures as well as a church. The project site contains a portion of Los Coches Creek which runs along the northwestern portion of the project site. The project includes dedication of an open space easement over the on-site wetlands and Los Coches Creek. No structures will be permitted within 50 feet of Los Coches Creek and the identified RPO wetland. Additionally, the open space easement will be protected and identified by open space fencing and signage. An approximately 30-foot limited building zone will also be located adjacent to the limits of the open space easement and fencing in order to prevent construction of structures that would require fuel-modification and fuel management into the open space easement. As detailed in the Fire Protection Plan prepared for the project, the project site contains existing slopes and will require a minimum setback of 15 feet from the top of slope and two story residences shall be set back from the slopes by a minimum of 30 feet. The existing workshop that is planned to be converted to a residential structure will require retrofitting the structure and permitting using building materials approved by the Lakeside Fire Protection District. The Fire Protection Plan identifies that no structure can be permitted on the property that would require fuel modification into the adjacent open space easement. The proposed open space easement will be maintained and allow hand clearing upon coordination with the Lakeside Fire Protection District and removal of dead foliage and leaves in accordance with the MOU between applicable wildlife agencies and San Diego County Fire Districts in order to allow for reduction of fuel risks while maintaining the biological function of the open space easement. The three residential lots will require dedication of on-site reciprocal access easements which will allow the three parcels to share access across the three parcels. Minimal access improvements on-site would be required for the shared access. No frontage improvements are proposed along Los Coches Road and two existing driveways will be used for access to the property. The project consists of residential structures and uses which do not typically include storage of hazardous flammable materials that are typically associated with commercial or industrial uses. Furthermore, implementation of fire safety standards would occur during the building permit process and is consistent with GPU EIR mitigation measure Haz-4.3. Therefore, for the reasons stated above, the project would not be expected to experience exacerbated wildfire risks due to slope, prevailing winds, or other factors.

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

- 20(c) The GPU EIR concluded this impact to be significant and unavoidable. As detailed in Section 20(b), the project does not include installation of infrastructure that will exacerbate

fire risk. The project includes dedication of an open space easement that will be maintained as well as a limited building zone. Therefore, the project would not require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts in the environment.

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

- 20(d) The GPU EIR concluded this impact to be significant and unavoidable. As detailed in Section 10, the project consists of minimal amounts of grading for minor on-site access improvements and future construction of utility lines in adjacent road right-of-way. A Drainage Certification Letter by May Engineering and Surveying dated February 2026 certifies that the drainage patterns on the project site will remain unchanged after implementation of the project. In addition, as stated in Sections 10(i) and 10(j), construction associated with the project will not be within a 100-year flood hazard area, floodway, or floodplain and would not be impacted from downstream flooding. The on-site floodplain/floodway will be placed within a dedicated biological open space easement and no construction is proposed within the adjacent floodway/floodplain. Therefore, the project would not expose people or structures to significant risk, including downslopes or downstream flooding or landslides, as a result of runoff, post-fire instability, or drainage changes.

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

Conclusion

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

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

Appendices

Appendix A – References Cited

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

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

Appendix A

The following is the list of project-specific technical studies used to support the project's environmental analysis. All technical studies are available on the website:

https://www.sandiegocounty.gov/content/sdc/pds/ceqa_public_review.html

The following is a list of project specific technical studies and documents used to support the analysis of each potential environmental effect:

Biological Resources:

Biology Letter Report, Biological Resources, Project Impacts, and Proposed Mitigation – The Fitch Tentative Parcel Map Project, Vince Scheidt, Inc., April 2026

Multiple Species Conservation Program Conformance Statement, Kendalyn White, April 15, 2026

Fire Protection:

Fire Protection Plan, J. Charles Weber, November 2025

Greenhouse Gas Emissions:

Fitch Residential Lot Split – TPM-21331, Greenhouse Gas Screening Letter San Diego County, Ldn Consulting, Inc., July 2024

Hydrology and Water Quality:

Drainage Certification Letter, May Engineering and Surveying, February 2026

Standard Stormwater Quality Management Plan, May Engineering and Surveying, February 2026

Noise:

Acoustical Analysis Report for Los Coches TPM No. 21331, Eilar Associates, Inc., May 2024

Service Availability Forms:

Project Facility Availability – Fire, Lakeside Fire Protection District, December 2022

Project Facility Availability – Sewer, San Diego County Sanitation District (Lakeside), February 2023

Project Facility Availability – Water, Lakeside Water District, March 2023

Project Facility Availability – School, Lakeside Union, February 2023

Project Facility Availability – School, Grossmont Union High School District, February 2023

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

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

<https://www.sandiegocounty.gov/content/sdc/pds/generalplan/GP-EIR.html#EIR>

Additional References:

California Air Pollution Control Officers Association

2022 California Emissions Estimator model (CalEEMod). User's Guide Version 2022.1.

California Air Resources Board

2022 2022 Scoping Plan:

[2022 Scoping Plan Documents | California Air Resources Board](#)

Airport Land Use Commission – San Diego County

2022 Airport Land Use Commission and San Diego County Regional Airport Authority,
Airport Land Use Compatibility Plan for Gillespie Field.

<https://www.san.org/wp-content/uploads/2025/08/Gillespie-Field-Airport.pdf>

State Water Resources Control Board (SWRCB)

2026 Geotracker Database.

<https://geotracker.waterboards.ca.gov/>

Appendix B

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

http://www.sdcounty.ca.gov/pds/gpupdate/GPU_FEIR_Summary_15183_Reference.pdf

Appendix C

County of San Diego Guidelines For Determining Significance and Report Format and Content Requirements, Transportation and Traffic is available on the County of San Diego's website at: https://www.sandiegocounty.gov/content/dam/sdc/dplu/docs/Traffic_Guidelines.pdf