February 15, 2024

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

Project Name: Bradley Apartment Complex
Project Record Numbers: PDS2019-LDGRMJ-30236, PDS2019-LDPIIP-6007
Environmental Log Number: PDS2019-LDGRMJ-30236

APN(s): 388-331-04, 05 & 06

Lead Agency Name and Address:
County of San Diego
Planning and Development Services
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Project Location:
The proposed Bradely Apartment Complex (project) is within unincorporated Lakeside Community Planning area of eastern San Diego County. The approximately 2.87-acre project site is at 1065-1069 East Bradley Avenue between North 1st Street and North Mollison Avenue.

Project Applicant Name and Address:

General Plan

Community Plan:	Lakeside
Regional Categories:	Village
Land Use Designations:	Village Residential (VR-15)
Density:	15 units per acre
Floor Area Ratio (FAR):	N/A

Zoning

Use Regulation:	Residential Variable (Rv)
Minimum Lot Size:	6000 square feet
Special Area Regulation:	C

Description of Project:

The proposed project is a major grading permit for the construction of 10 two story apartment buildings with a landscape common area, parking stalls, and a concrete paved driveway. Each building includes six units for a total of 60 units along with attached carports. Five units would be dedicated to affordable to very low-income housing. The property is currently occupied by a single-family house and metal workshop. The existing structures would be demolished to make room for the development of the

apartment complex. Access would be from a private 24-foot-wide driveway connecting to East Bradley Avenue. The proposed project also includes frontage improvements along the southside of East Bradley Avenue between Mollison Avenue and North First Street to include construction of sidewalks, curb, and gutter. Grading consists of a balanced cut and fill of 7,500 cubic yards (cy) with no imports or exports. The project would be served by the Wintergardens Sanitation District and imported water from Helix Water District. The proposed project would include the extension of an 8-inch sewer main and 8-inch water main for service to the project site.

Discretionary Actions:
The project applicant and/or contractor of the proposed project would be required to obtain the following additional approvals and/or permits from the County:

- Major Grading Permit
- Improvement Plan

These approvals require meeting certain conditions of project approval before obtaining the required permits.

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

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

represents where water and wastewater infrastructure currently exist. This area is more developed than the eastern areas of the unincorporated County and would accommodate more growth under the GPU.

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

Summary of Findings
The project is consistent with the analysis performed for the GPU EIR. Further, the GPU EIR adequately anticipated and described the impacts of the project, identified applicable mitigation measures necessary to reduce project-specific impacts, and the project implements these mitigation measures (refer to https://www.sandiegocounty.gov/content/dam/sdc/pds/gpupdate/docs/BOS_Aug2011/EIR/FEIR_7.00_-_Mitigation_Measures_2011.pdf).

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

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

1. **The project is consistent with the development density established by existing zoning, community plan or General Plan policies for which an EIR was certified.**
   The project would develop a 2.94-acre property with 60 multi-family residential units. Under the current zoning, the maximum allowable density is 15 dwelling unit per acre or 44 units for the project site. The project is eligible for a density bonus given that 5 of the 60 units would be dedicated to affordable very low-income housing, consistent with the County's Zoning Ordinance and certified by the GPU EIR. With the 5 very low-income units, the project is eligible for 15 additional units. Therefore, the project is eligible for 64 total units, and the project proposes 60 units. In addition, the density bonus allows for reduction in setbacks, private usable open space, and parking. Therefore, because the project is eligible for a density bonus, which is consistent with the County's Zoning Ordinance, the project is consistent with the development density established by existing zoning, community plan or General Plan policies.

2. **There are no project-specific effects which are peculiar to the project or its site, and which the GPU EIR failed to analyze as significant effects.**
   The subject property is no different than other properties in the surrounding area, and there are no project-specific effects that are peculiar to the project or its site. The project site is in an area developed with single-family residential lots and commercial uses. The property does not support any peculiar environmental features, and the project would not result in any peculiar effects.

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

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

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

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

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

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

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

	February 15, 2024
Signature	Date
Souphalak Sakdarak	**Land Use/Environmental Planner**
Printed Name	Title

CEQA Guidelines §15183 Exemption Checklist

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

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

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

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

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

Discussion

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

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

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

The project site is located east of State Route 67 along East Bradley Avenue between Woodburn Street and Kyle Place within the Lakeside Community Plan Area in the unincorporated County of San Diego. The El Capitan Reservoir is the closest RCA identified by the County of San Diego General Plan and Lakeside Community Plan located within the vicinity of the project site. However, this RCA is located approximately nine miles to the northeast and is not visible from the project site. Further, the project site is surrounded by residential and light industrial (e.g., storage, trucking) uses. Therefore, the proposed residential land uses on the project site would not have a substantial effect on a scenic vista.

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

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

1(b) The GPU EIR concluded this impact to be less than significant with mitigation. State scenic highways refer to those highways that are officially designated by the California Department of Transportation (Caltrans) as scenic (Caltrans California Scenic Highway Program). Generally, the area defined within a state scenic highway is the land adjacent to and visible from the vehicular right-of-way. The dimension of a scenic highway is usually identified using a motorist's line of vision, but a reasonable boundary is selected when the view extends to the distant horizon. The scenic highway corridor extends to the visual limits of the landscape abutting the scenic highway. The nearest state-designated scenic highway to the project site is State Route 94, located approximately 4.4 miles southwest of the project site. As such, the project site is not within the vicinity of a state-designated scenic highway, and therefore, would not have any impacts to scenic resources within a state scenic highway. Further, the project site is surrounded by residential and light industrial (e.g., storage, trucking) uses. Therefore, the proposed residential land uses on the project site would not have a substantial effect on a state-designated scenic highway.

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

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

The project site is currently developed and occupied by a single-family house and metal workshop. Properties surrounding the project site are developed with single-family residential, commercial, and light industrial uses. The visual character surrounding the project site is characterized by Medium Density Residential land uses, a church, a school, commercial businesses, and light industrial (e.g., storage, trucking) uses. The project would not detract from, or contrast with the existing visual character and/or quality of the surrounding areas. Additionally, the location, size, and design of the proposed use would be compatible with uses in the area. The project site is located within an area which is developed with similar land use types.

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

1(d) The GPU EIR concluded this impact to be significant and unavoidable. The project would develop a 2.94-acre property with 60 multi-family residential units. Construction of the project would include the installation of new streetlights along the frontage of the project on East Bradley Avenue and lighting at each of the residential units. However, the project site is located within Zone B of the County of San Diego Light Pollution Code (more than 15 miles from the Mount Laguna Observatory or the Palomar Observatory). The project would not adversely affect nighttime views or astronomical observations because the project would be required to conform to the County

Light Pollution Code (Sections 51.201–51.209) to prevent spillover onto adjacent properties and minimize impacts to dark skies. Compliance with the Code would be required prior to the issuance of a Building Permit. The Code was developed by the County in cooperation with lighting engineers, astronomers, and other experts to effectively address and minimize the impact of new sources of light pollution on nighttime views. Thus, the project would not create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area.

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

Conclusion

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

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

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

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

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

	Significant Project Impact	Impact not Identified by GPU EIR	Substantial New Information
2. Agriculture/Forestry Resources – Would the project:			
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide or Local Importance as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, or other agricultural resources, to a non-agricultural use?	☐	☐	☐
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐
c) Conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland zoned Timberland Production?	☐	☐	☐
d) Result in the loss of forest land, conversion of forest land to non-forest use, or involve other changes in the existing environment, which, due to their location or	☐	☐	☐

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

Discussion

2(a) The GPU EIR concluded this impact to be significant and unavoidable. The project site was historically used for agricultural purposes. However, the project site is zoned Residential Variable (RV) and has been designated as Urban and Built-Up Land by the Department of Conservation, Farmland Mapping and Monitoring Program, and as such, would not be classified as an important agricultural resource. Therefore, there are no agricultural resources on the site that would be impacted.

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

2(b) The GPU EIR concluded this impact to be less than significant with mitigation. The project site is zoned Residential Variable (RV); therefore, as mentioned above in Section 2(a), the project site would not be considered an agricultural resource. The nearest lands under Williamson Act Contract or in an agricultural preserve are located approximately 18 miles east of the project site. Due to distance, no land use interface conflicts would occur. Additionally, the project is for the development of a residential subdivision, which is compatible with the surrounding residential land use types. Therefore, the project would not conflict with existing zoning for agricultural use or a Williamson Act Contract.

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

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

As previously discussed, forestry resources were not specifically analyzed under the GPU EIR because Appendix G of CEQA Guidelines was amended to include significance criteria for forestry resources after the release of the Notice of Preparation (NOP) for the GPU EIR. However, because the project would have a less than significant impact to forest resources for the reasons detailed above, the project would be consistent with the analysis in the GPU EIR because it would

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

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

2(e) The GPU EIR concluded this impact to be significant and unavoidable. As mentioned above in responses 2(a) and 2(b), the site is developed with no active agricultural use types. The site is not classified as an important farmland category pursuant to the Farmland Mapping and Monitoring Program. In addition, no active agricultural operations exist within the vicinity of the project site.

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

Conclusion

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

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

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

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

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

	Significant Project Impact	Impact not Identified by GPU EIR	Substantial New Information
3. Air Quality – Would the project:			
a) Conflict with or obstruct implementation of the San Diego Regional Air Quality Strategy (RAQS) or applicable portions of the State Implementation Plan (SIP)?	☐	☐	☐
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	☐	☐	☐

c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	☐	☐	☐
d) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☐
e) Create objectionable odors affecting a substantial number of people?	☐	☐	☐
a) Conflict with or obstruct implementation of the San Diego Regional Air Quality Strategy (RAQS) or applicable portions of the State Implementation Plan (SIP)?	☐	☐	☐

Discussion

Construction-related and operational air emissions resulting from the proposed project were estimated by Harris & Associates, using the California Emissions Estimator Model (CalEEMod) version 2020.4.0 (California Air Pollution Control Officers Association [CAPCOA] 2021; Appendix C). The following responses have incorporated the analysis from the report.

3(a) The GPU EIR concluded this impact to be less than significant. San Diego County is currently designated as a non-attainment area for the federal standards for ozone (O_3) as well as the state standards for O_3, particulate matter less than or equal to 10 microns (PM_{10}), and particulate matter less than or equal to 2.5 microns ($PM_{2.5}$). The RAQS and the region's portion of the SIP are the region's plans for attainment and maintaining air quality standards. The RAQS and SIP rely on information from the California Air Resources Board (CARB) and San Diego Association of Governments (SANDAG), including projected growth, to project future emissions and determine from that the strategies necessary for the reduction of stationary source emissions through regulatory controls. Projects that propose development that is consistent with the land use designations and growth anticipated by the local general plans and SANDAG are, by definition, consistent with the RAQS and SIP.

The project would include construction activities for and operation of up to 60 multi-family homes. Construction activities would include grading, building construction, paving, and architectural coating. Grading operations associated with the construction of the project would be subject to the Grading Ordinance, which requires the implementation of dust control measures and San Diego County Air Pollution Control District (SDAPCD) Rule 55. Project grading is limited to a balanced cut and fill of 7,500 cubic yards. The project is eligible for a density bonus given that 5 of the 60 units would be dedicated to affordable to very low-income housing, consistent with the County General Plan and certified by the GPU EIR. Therefore, because the project is eligible for a density bonus, which is assumed in the General Plan projections, the project would not conflict with or obstruct implementation of the RAQs or SIP.

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

3(b) The GPU EIR concluded this impact to be significant and unavoidable. As discussed in Section 3(a), San Diego County is currently in non-attainment for O_3 under the National Ambient Air Quality Standard (NAAQS). San Diego County is also presently in non-attainment for O_3, PM_{10} and $PM_{2.5}$ under the California Ambient Air Quality Standard (CAAQS). O_3 is formed when volatile organic compounds (VOCs) and nitrogen oxides (NO_x) react in the presence of sunlight. VOC sources include any source that burns fuels (e.g., gasoline, natural gas, wood, oil), solvents, petroleum processing and storage, and pesticides. Sources of NOx include any source that burns fuel. Sources of PM_{10} and $PM_{2.5}$ in both urban and rural areas include the following: motor vehicles, wood burning stoves and fireplaces, dust from construction, landfills, agriculture, wildfires, brush/waste burning, and industrial sources of windblown dust from open lands.

A project would have a significant direct impact related to criteria pollutants if it would exceed any of the County's Screening Level Thresholds (SLTs) presented in Table 1, County of San Diego Screening Level Thresholds. The County's SLTs are based on SDAPCD Rules 20.1, 20.2, and 20.3 and were adopted from the SDAPCD Air Quality Impact Analysis trigger level thresholds to align with attainment of the NAAQS and be protective of public health. Therefore, air emissions below the SLTs would meet the NAAQS. The NAAQS were developed to protect public health, specifically the health of "sensitive" populations, including asthmatics, children, and the elderly.

Table 1
County of San Diego Screening Level Thresholds

Pollutant	Emission Rate		
	Pounds/Hour	Pounds/Day	Tons/Year
Respirable Particulate Matter (PM_{10})	--	100	15
Fine Particulate Matter ($PM_{2.5}$)	--	55[a]	10[a]
Oxides of Nitrogen (NO_X)	25	250	40
Oxides of Sulfur (SO_X)	25	250	40
Carbon Monoxide (CO)	100	550	100
Lead and Lead Compounds	--	3.2	0.6
Volatile Organic Compounds (VOCs)	--	75[b]	13.7[c]

SOURCE: SDAPCD, Rules 20.1, 20.2, 20.3; County of San Diego 2007.

[a] Based on the U.S. EPA "Proposed Rule to Implement the Fine Particle National Ambient Air Quality Standards" published September 8, 2005. Also used by the South Coast Air Quality Management District.

[b] Threshold for VOCs based on the threshold of significance for VOCs from the South Coast Air Quality Management District for the Coachella Valley.

[c] 13.7 tons per year threshold based on 75 pounds per day multiplied by 365 days per year and divided by 2,000 pounds per ton.

Air emissions were calculated using CalEEMod version 2020.4.0 (CAPCOA 2021). CalEEMod is a tool used to estimate air emissions resulting from land development projects in the State of California. The model generates air quality emission estimates from construction activities and breaks down operational criteria pollutant emissions into three categories: mobile sources (e.g., traffic), area sources (e.g., landscaping equipment, consumer projects, and architectural coatings), and energy sources (e.g., natural gas heating). CalEEMod provides emission estimates of NO_X, carbon monoxide (CO), oxides of sulfur (SO_X), respirable particulate matter (PM_{10}), fine particulate matter ($PM_{2.5}$), and VOCs. Inputs to CalEEMod include such items as the air basin containing the project, land uses, trip generation rates, trip lengths, duration of construction phases, construction equipment usage, and grading areas, as well as other parameters.

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

project would be consistent with the analysis 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.

Construction Emissions

Construction-related activities are temporary, short-term sources of air emissions. Sources of construction-related air emissions include:

- Fugitive dust from demolition and grading activities
- Construction equipment exhaust
- Construction-related trips by workers, delivery trucks, and material-hauling trucks
- Construction-related power consumption

Construction-related pollutants result from dust raised during demolition and grading, emissions from construction vehicles, and chemicals used during construction. Fugitive dust emissions vary greatly during construction and are dependent on the amount and type of activity, silt content of the soil, and the weather. Vehicles moving over paved and unpaved surfaces, demolition, excavation, earth movement, grading, and wind erosion from exposed surfaces are all sources of fugitive dust. Construction operations are subject to the requirements established in SDAPCD Regulation 4, Rules 52, 54, and 55. Rule 52 sets limits on the amount of particulate matter that can be discharged into the atmosphere. Rule 54 sets limits on the amount of dust and fumes that can be released into the atmosphere. Rule 55 regulates fugitive dust and provides roadway dust track-out/carry-out requirements.

Heavy-duty construction equipment is usually diesel powered. In general, emissions from diesel-powered equipment contain more NO_X, SO_X, and PM than gasoline-powered engines. However, diesel-powered engines generally produce less CO and less VOCs than gasoline-powered engines. Standard construction equipment includes tractors/loaders/backhoes, rubber-tired dozers, excavators, graders, cranes, forklifts, rollers, paving equipment, generator sets, welders, cement and mortar mixers, and air compressors.

Primary inputs are the numbers of each piece of equipment and the length of each construction stage. Construction is anticipated to last approximately 13 months. CalEEMod estimates the required construction equipment for a project based on surveys, performed by the South Coast Air Quality Management District and the Sacramento Metropolitan Air Quality Management District of typical construction projects, which provide a basis for scaling equipment needs and schedule with a project's size. Air emission estimates in CalEEMod are based on the duration of construction phases; construction equipment type, quantity, and usage; grading area; season; and ambient temperature, among other parameters. Project emissions were modeled for the following stages: demolition, site preparation, grading, building construction/ architectural coatings, and paving.

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

- Per the County's Standard Mitigation and Project Design Consideration Grading, Clearing, and Watercourses Ordinance (Grading Ordinance) Section 87.428 and SDAPCD Rule 55, the applicant shall implement one or more of the following dust control measures during all grading activities:

  - Water actively disturbed surfaces three times a day.
  - Apply non-toxic soil stabilizers to inactive, exposed surfaces when not in use for more than 3 days. Non-toxic soil stabilizers should also be applied to any exposed surfaces immediately (i.e., less than 24 hours) following completion of grading activities if the areas would not be in use for more than 3 days following completion of grading.
  - Remove soil track-out from paved surfaces daily or more frequently as necessary.
  - Minimize the track-out of soil onto paved surfaces by installation of wheel washers.
- Per SDAPCD Rule 67, the applicant shall use regulated coatings for all architectural coating activities.
- Per CARB's ATCM 13 (California Code of Regulations Chapter 10 Section 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.

Table 2 presents the total projected construction maximum daily emission levels for each criteria pollutant. Note that the emissions summarized in Table 2 are the maximum emissions for each pollutant that would occur during each phase based on all modeled construction equipment being active on the same day. Actual construction activities would vary day to day, with all equipment active on some days, and less equipment active on other days depending on the construction task. Therefore, these are the maximum emissions that would occur in a day. As shown in Table 2, maximum construction emissions would not exceed the County's SLTs for any criteria pollutants. Furthermore, project construction would be limited and would last for approximately 13 months. Therefore, the project would not violate any air quality standard or contribute substantially to an existing or projected air quality violation.

Table 2
Summary of Maximum Construction Emissions
(pounds per day)

	Pollutant					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Maximum Daily Emissions	**26.9**	**31.7**	**30.9**	**0.05**	**21.2**	**11.4**
County Screening Level Thresholds	75	250	550	250	100	55
Significant Impact?	*No*	*No*	*No*	*No*	*No*	*No*

Operational Emissions

The project would include construction activities for and operation of up to 60 multi-family homes. Table 3 presents daily operational emissions associated with these four residences. As shown in Table 3, the project's daily operational emissions would not exceed the SLTs for any criteria pollutant. Therefore, the project would not violate any air quality standard or contribute substantially to an existing or projected air quality violation.

Table 3
Summary of Project Operational Emissions
(pounds per day)

	Pollutant					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Total Operational Emissions	**5.45**	**1.71**	**29.0**	**0.07**	**4.37**	**2.51**
SDAPCD Threshold	75	250	550	250	100	55

Significant Impact?	*No*	*No*	*No*	*No*	*No*	*No*

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

3(c) The GPU EIR concluded this impact to be significant and unavoidable. San Diego County is presently in non-attainment for the NAAQS and CAAQS for O_3. San Diego County is also presently in non-attainment for PM_{10} and $PM_{2.5}$ under the CAAQS. O_3 is formed when VOCs and NO_X react in the presence of sunlight. VOC sources include any source that burns fuels (e.g., gasoline, natural gas, wood, oil), solvents, petroleum processing and storage, and pesticides. Sources of PM_{10} and $PM_{2.5}$ in both urban and rural areas include motor vehicles, wood-burning stoves and fireplaces, dust from construction, landfills, agriculture, wildfires, brush/waste burning, and industrial sources of windblown dust from open lands.

Cumulative impacts could occur if the most intensive phases of construction for the proposed project occur simultaneously with other intensive phases of proposed projects in close proximity. The most intensive construction phase for the project and for typical developments occurs during earthwork and grading activities. During these phases, the primary criteria air pollutant of concern would be PM_{10}. As shown in Table 5, the project's maximum daily emissions of PM_{10} was estimated to be 21.2 pounds/day, which would be well below the County's SLT of 100 pounds/day for PM_{10} during construction activities. Further, due to the highly dispersive nature of particulate matter, a cumulative impact during construction activities would only occur if a project adjacent to the proposed project undergoes simultaneous grading/earthwork activities and emits significantly greater PM_{10} emissions than the Project. Because all projects developed within the County would be required to comply with the County Grading Ordinance and SDAPCD Rule 55, this scenario is not anticipated to occur.

The project would contribute PM_{10}, $PM_{2.5}$, NO_X, and VOC emissions from construction/grading activities; however, it would not exceed established SLTs (see Section 3(b) above). As described above, the County's SLTs align with attainment of the NAAQS which were developed to protect the public health, specifically the health of "sensitive" populations, including asthmatics, children, and the elderly. Consequently, project construction would have a less than significant impact to public health. Additionally, grading and all other construction activities would be subject to the measures listed above, including the implementation of dust control measures consistent with the County of San Diego Grading Ordinance and SDAPCD Rule 55. Given the developed nature of the project vicinity, it is unlikely that other major construction activities would occur in the same area at the same time. There are no proposed projects or reasonably foreseeable future projects within proximity of the project that are anticipated to include construction concurrent with the project. Therefore, project construction would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard, and impacts would be less than significant.

The Project would generate PM_{10}, $PM_{2.5}$, and NO_X emissions during project operations primarily from mobile sources (i.e., vehicle trips), and VOCs from area and mobile sources. However, as previously described, operational emissions of all pollutants would be below the County's recommended SLTs. As described above, the County's SLTs align with attainment of the NAAQS which were developed to protect the public health, specifically the health of "sensitive" populations, including asthmatics, children, and the elderly. Therefore, project operation would

not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard, and impacts would be less than significant.

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

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

3(d) The GPU EIR concluded this impact to be significant and unavoidable. Air quality regulators typically define sensitive receptors as schools (preschool–12th grade), hospitals, resident care facilities, daycare centers, residences, or other facilities that may house individuals with health conditions that would be adversely impacted by changes in air quality. The project includes the development of 37 detached multi-family residences, with associated parking and open space. The project would not be considered a point source of significant emissions. The project would generate construction emissions in the vicinity of sensitive receptors.

Diesel particulate matter (DPM) is the primary toxic air contaminant (TAC) of concern and is generated from fuel consumption in heavy construction equipment. Projects that would result in exposure to TACs resulting in a maximum incremental cancer risk greater than one in one million without application of best available control technology for toxics, or a threshold of 10 in 1 million for projects implementing best available control technology for air toxics or a health hazard index greater than 1, would be considered as having a potentially significant impact.

Construction of the project would result in the generation of DPM emissions from the use of off-road diesel construction activities and on-road diesel equipment used to bring materials to and from the project site. Generation of DPM from construction projects typically occurs in a single area for a short period. Construction of the project would occur over a 13-month period. The dose to which the receptors are exposed is the primary factor used to determine health risk. Dose is a function of the concentration of a substance or substances in the environment and the extent of exposure that person has with the substance. Dose is positively correlated with time, meaning that a longer exposure period would result in a higher exposure level for the Maximally Exposed Individual. The risks estimated for a Maximally Exposed Individual are higher if a fixed exposure occurs over a longer period of time.

Due to the limited time of exposure, project construction is not anticipated to create conditions where the probability is greater than 10 in one million of contracting cancer for the Maximally Exposed Individual or to generate ground-level concentrations of noncarcinogenic TACs that exceed a Hazard Index greater than 1 for the Maximally Exposed Individual. Additionally, with ongoing implementation of U.S. Environmental Protection Agency (EPA) and CARB requirements for cleaner fuels, off-road diesel engine retrofits, and new low-emission diesel engine types, the DPM emissions of individual equipment would be substantially reduced. Consequently, DPM generated during construction would not result in the exposure of sensitive receptors to

substantial pollutant concentration. Therefore, the project would not expose sensitive receptors to substantial pollutant concentrations, and impacts would be less than significant.

The project would introduce additional residential homes which are considered new sensitive receptors; however, the project site is not located within 0.25-mile of any identified point source of significant emissions and is surrounded by residential homes, commercial, and light industrial uses. Similarly, the project does not propose uses or activities that would result in exposure of these sensitive receptors to significant pollutant concentrations and would not place sensitive receptors near any CO hotspots.

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

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

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

Conclusion

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

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

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

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

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

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

Discussion

4(a) The GPU EIR concluded this impact to be significant and unavoidable. Based on an analysis of the County's Geographic Information System (GIS) records and aerial imagery of the site, it has been determined that no native vegetation communities or habitats exist on or adjacent to the site. Based on these considerations, no direct or indirect impacts to sensitive natural communities supporting candidate, sensitive, or special status species would occur. Further, properties surrounding the project site are developed with single-family residential, commercial, and light industrial uses. The proposed project would develop multi-family residential units, which would be compatible with surrounding land uses.

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

4(b) Based on an analysis of the County's GIS records, aerial imagery of the site, and site photos, it has been determined that the proposed project site does not contain any riparian habitat or other sensitive natural communities as defined by the County of San Diego Multiple Species Conservation Program (MSCP), County of San Diego Resource Protection Ordinance (RPO), Natural Community Conservation Plan (NCCP), Fish and Wildlife Code, Endangered Species Act, Clean Water Act or any other local plans, policies or regulations. The project site is surrounded by developed single-family residential, commercial, and light industrial uses. The proposed project would develop multi-family residential units, which would be compatible with surrounding land uses. Therefore, the project will not have a substantial adverse effect on any riparian habitat or other sensitive natural community.

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

4(c) The proposed project site does not contain any wetlands as defined by Section 404 of the Clean Water Act, including, but not limited to, marsh, vernal pool, stream, lake, river or water of the U.S., that could potentially be impacted through direct removal, filling, hydrological interruption, diversion or obstruction by the proposed development. Therefore, no impacts will occur to wetlands defined by Section 404 of the Clean Water Act and under the jurisdiction of the Army Corps of Engineers.

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

4(d) Based on a GIS analysis and aerial imagery of the site, it has been 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. Adjoining properties surrounding the project site are already developed with residential, commercial, and light industrial (e.g., storage, trucking) uses.

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

4€ The GPU EIR concluded this impact to be less than significant. The project site is not within the County of San Diego MSCP boundary and is not subject to the County of San Diego MSCP requirements. The project is consistent with the County's Guidelines for Determining Significance for Biology, the County's RPO, and MBTA, with the implementation of mitigation. The project would not conflict with the provisions of any adopted Habitat Conservation Plan, NCCP, other approved local, regional, or state Habitat Conservation Plan or any other local policies or ordinances that protect biological resources.

As the proposed project would have a less than significant impact for the reasons detailed above, the project would be consistent with the analysis in the GPU EIR because it would not create new

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

Conclusion

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

	Significant Project Impact	Impact not Identified by GPU EIR	Substantial New Information
5. Cultural Resources – Would the project:			
a) Cause a substantial adverse change in the significance of a historical resource as defined in 15064.5?	☐	☐	☐
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to 15064.5?	☐	☐	☐
c) Directly or indirectly destroy a unique geologic feature?	☐	☐	☐
d) Directly or indirectly destroy a unique paleontological resource or site?	☐	☐	☐
e) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☐	☐

Discussion

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

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

5(b) The GPU EIR concluded this impact to be less than significant with mitigation. Based on the review of County records as well as the database from the South Coastal Information Center it

has been determined that the project site has not been surveyed. However, the area has been previously developed and graded and it has been determined that no archaeological monitoring program would be required.

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

5(c) The site does not contain any unique geologic features that have been listed in the County's Guidelines for Determining Significance for Unique Geology Resources nor does the site support any known geologic characteristics that have the potential to support unique geologic features.

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

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 have the potential to contain unique paleontological resources. As such, a paleontological grading monitoring program is required.

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

The proposed project would have a less than significant impact with implementation of Cul-3 as described in the GPU EIR for the reasons detailed above. Therefore, with implementation of Cul-3, the project would be consistent with the analysis in the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance other than the information identified in the GPU EIR.

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

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

Conclusion

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

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

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

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

4. Feasible mitigation measures contained in the GPU EIR (Cul-3.1).

	Significant Project Impact	Impact not Identified by GPU EIR	Substantial New Information
6. Energy Use – Would the project:			
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☐
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☐

Discussion

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

6(a) The project would increase the demand for electricity and natural gas at the project site, and gasoline consumption in the project 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, Section 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 of the Building Code regulations, would occur through the transport of construction materials to and from the site during the construction phase, the use of personal vehicles by residents, and the operation of delivery vehicles to service the new residential units.

The project includes the following energy conservation measures:

- Compliance with the County's Water Conservation in Landscaping Ordinance, demonstrating a 40 percent reduction in outdoor use which would reduce energy required for water conveyance
- Installation of low-flow indoor water fixtures and at least one energy-efficient appliance in all residential units, reducing water and energy consumption
- Compliance with the California Code of Regulations 2022 Title 24 Part 6 Building Code. Compliance with Title 24 results in highly energy-efficient buildings
- Each proposed unit would be constructed as Electrical Vehicle (EV) Ready pursuant to CALGreenTier 2, including the installation of necessary electrical components to support future charging station
- Each proposed unit would be constructed as an electric-ready structure

Grading and Construction

Project grading includes 7,500 cubic yards of cut with no import or export. During the grading and construction phases of the project, the primary energy source used 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. Construction activities including electricity would be temporary and negligible; therefore, electricity use during grading and construction would not result in wasteful, inefficient, or unnecessary consumption of energy. In addition, natural gas is not anticipated to be required during construction of the project. Any minor amounts of natural gas that may be consumed as a result of the project construction would be temporary and negligible and would not have an adverse effect; therefore, natural gas used during grading and construction would also not result in wasteful, inefficient, or unnecessary consumption of energy.

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

Operational

Operation of the project would be typical of residential land uses, including space and water heating and landscape maintenance activities. The project would meet the California Code of Regulations Title 24 Standards for energy efficiency that are in effect at the time of construction. The project would also comply with the County’s Landscape Ordinance and the water use application using prescriptive compliance option to reduce overall water use on site.

The project is consistent with the General Plan density and zoning designation and would result in roughly equivalent or less operational mobile energy usage than what has been anticipated within the General Plan. 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 II Progra€AFE Standards) are designed to reduce wasteful, unnecessary, and inefficient use of fuel. The coupling of various state policies and regulations such as the Zero-Emission Vehicles Mandate and Senate Bill (SB) 350 would result in the deployment of EVs, which would be powered by an increasingly renewable electrical grid. The project would require future residences to be constructed as EV ready per CALGreen Tier 2,

increasing the ability of future residents to use EVs. Therefore, the project would not be expected to result in wasteful, inefficient, or unnecessary mobile energy usage throughout project operations beyond what was anticipated in the GPU EIR.

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

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

- Compliance with the County's Water Conservation in Landscaping Ordinance, demonstrating a 40 percent reduction in outdoor use which would reduce energy required for water conveyance.
- Installation of low-flow indoor water fixtures and at least one energy-efficient appliance in all residential units, reducing water and energy consumption.
- Compliance with the California Code of Regulations, Title 24, Part 6, Building Code. Compliance with Title 24 results in highly energy-efficient buildings.
- Each proposed unit would be constructed as EV ready pursuant to CALGreen Tier 2, including the installation of necessary electrical components to support future charging station.
- Each proposed unit would be constructed as an electric-ready structure.

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

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

Conclusion

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

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

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

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

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

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

Discussion

Potential impacts related to geology and soils resulting from the project are evaluated in a Geotechnical Investigation prepared by Soil Testers, dated March 21, 2022. The following responses have incorporated the analysis from the report.

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

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

7(a)(ii) The GPU EIR concluded this impact to be less than significant. To ensure the structural integrity of all buildings and structures, the project must conform to the Seismic Requirements as outlined within the California Building Code. In addition, a soils compaction report with proposed foundation recommendation would be required to be approved before the issuance of a Building Permit. The report would review the qualities of the soil, its expansive characteristics, relative compaction, and any soil constraints, which if not corrected may lead to structural defects of buildings or structures constructed or to be constructed on the site. During the review of the

Building Permit, the County Building Official shall review the report and ensure measures are taken to prevent structural damage to future buildings or structures to be constructed on the site. Therefore, compliance with the California Building Code and the County Building Code would ensure that the project would not result in a significant impact.

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

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

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

7(a)(iv) The GPU EIR concluded this impact to be less than significant. The project is located in a Landslide Susceptibility Area classified as "low/marginally susceptible" as identified in the County Guidelines for Determining Significance for Geologic Hazards.

As previously discussed, the GPU EIR determined less than significant impacts from exposure to seismic-related hazards and soil stability. As the proposed project would have a less than significant impact with the incorporation of project conditions for a soils compaction report, the project would be consistent with the analysis 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 iden€ified in the GPU EIR.

7(b) The GPU EIR concluded this impact to be less than significant. According to the Soil Survey of San Diego County, the site contains Wyman loam (WmB) and Greenfield sandy loam (GrD). However, the project would not result in substantial soil erosion or the loss of topsoil because the project would be required to comply with the Watershed Protection Ordinance (WPO) and Grading Ordinance. Compliance with these ordinances would ensure that the project would not result in any unprotected erodible soils, would not substantially alter existing drainage patterns, and would not develop on steep slopes. Additionally, the project would be required to implement best management practices (BMPs) per the Standard Development Project Storm Water Quality Management Plan (SWQMP) and a Stormwater Pollution Prevention Plan (SWPPP). Please refer to Section 10, Hydrology and Water Quality, for a detailed discussion.

As previously discussed, the GPU EIR determined impacts from soil erosion and topsoil loss to be less than significant. As the project would have a less than significant impact for the reasons detailed above, the project would be consistent with the analysis 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€R.

7(c) The GPU EIR concluded this impact to be less than significant. As indicated in response 7(a)(iv), the site is not located in a Landslide Susceptibility Area, as identified in the County Guidelines for

Determining Significance for Geologic Hazards. Furthermore, the site is within a Potential Liquefaction Area.

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

As previously discussed, the GPU EIR determined impacts from soil stability to be less than significant. As the project would have a less than significant impact with the incorporation of standard conditions, the project would be consistent with the analysis 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 be in compliance with the Building Code, preparation of a Soils Engineering Report, and implementation of standard engineering techniques would ensure structural safety.

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

7(e) The GPU EIR concluded this impact to be less than significant. The project would rely on the existing sewer lines that serve surrounding residential, commercial, and light industrial properties. 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 in the GPU EIR would be required because project-specific impacts would be less than significant by adhering to the project conditions of approval, which are consistent with the GPU EIR.

8. Greenhouse Gas Emissions – Would the project:	**Significant Project Impact**	**Impact not Identified by GPU EIR**	**Substantial New Information**
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☐
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☐

Discussion

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

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

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

CEQA Guidelines Section 15064(h)(1), states that "the lead agency shall consider whether the cumulative impact is significant and whether the effects of the project are cumulatively considerable." A cumulative impact may be significant when the project's incremental effect, though individually limited, is cumulatively considerable. CEQA Guidelines Section 15064.4(a)(2) allows the lead agency to rely on a qualitative analysis or performance based standards to determine the significance of impacts from GHG emissions.

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

On February 14, 2018, the County Board of Supervisors (Board) adopted a CAP, which identifies specific strategies and measures to reduce GHG emissions in the largely rural, unincorporated

areas of San Diego County as well as County government operations (County of San Diego 2018). The CAP aimed to meet the state's 2020 and 2030 GHG reduction targets (AB 32 and SB 32, respectively), and demonstrate progress toward the 2050 GHG reduction goal.

On September 30, 2020, the County Board of Supervisors voted to set aside its approval of the County's 2018 CAP and related actions because the Final Supplemental EIR (2018 CAP SEIR) was found to be out of compliance with CEQA. In response to this County Board of Supervisors action, the County is preparing a CAP Update to revise the 2018 CAP and correct the items identified by the 4th District Court of Appeal in San Diego within the Final 2018 CAP SEIR that were not compliant.

The County does not currently have locally adopted screening criteria or GHG thresholds. Pending adoption of a new CAP, appropriate GHG emissions thresholds were considered for purposes of this analysis for this project. CEQA Guidelines, Section 15064.7(d), states that a lead agency may consider thresholds of significance previously adopted or recommended by other public agencies, provided the decision of the lead agency to use such threshold is supported by substantial evidence. Based on the specific characteristics of the project, the approach endorsed by the California Supreme Court in *Center for Biological Diversity v. Department of Fish & Wildlife* (2015) (62 Cal.4th 204), which evaluates a project based on its effect on California's efforts to meet the State's long-term climate goals, was used to evaluate GHG emissions. As the Supreme Court held in that case, a project that would be consistent with meeting those goals can be found to have a less-than-significant impact on climate change under CEQA. If a project would contribute its "fair share" of what will be required to achieve those long-term climate goals, then a reviewing agency can find that the impact will not be significant because the project will help to solve the problem of global climate change (62 Cal.4th 220–223).

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

The 2017 and 2022 Scoping Plans identify state strategies for achieving the state's 2030 and 2045 GHG emissions reduction targets codified by SB 32 and AB 1279, respectively. Measures under the 2017 and 2022 Scoping Plans scenario build on existing programs such as the Low Carbon Fuel Standard, Advanced Clean Cars Program, Renewables Portfolio Standard (RPS), Sustainable Communities Strategy (SCS), Short-Lived Climate Pollutant Reduction Strategy, and the Cap-and-Trade Program. The adopted regulations of the 2022 Scoping Plan apply to new development or the emission sectors associated with new development.

Building Energy Use

Energy use emissions are generated by activities within buildings that use electricity and natural gas as energy sources. GHGs are emitted during the generation of electricity from fossil fuels off-site in power plants. These emissions are considered indirect but are calculated in association with a building's overall operation. Natural gas usage emits GHGs directly when it is burned for space heating, cooking, hot water heating and similar uses, whereas electricity usage emits GHGs indirectly to the extent that it is generated by burning carbon-based fuels. State regulations and 2017 and 2022 Scoping Plans' measures that would reduce the project's energy-related GHG emissions include RPS, Title 24 Energy Efficiency Standards, and CALGreen. The project would

be served by SDG&E, which has achieved 44 percent renewables as of 2019. The project's energy related GHG emissions would decrease as SDG&E increases its renewables procurement toward the 2030 goal of 60 percent and zero carbon sources by 2045. Additionally, the project would be constructed in accordance with energy efficiency standards effective at the time building permits are issued and the residences are constructed. The project would result in GHG emissions from energy used in 60 new residences. As discussed in detail in Section 6, Energy, construction and operation of the project is not expected to result in the wasteful or inefficient use of energy. GHG emissions associated with electricity and natural gas use would be eliminated as California decarbonizes the electrical generation infrastructure as committed to by 2045 through SB 100, the 100 percent Clean Energy Act of 2018. Therefore, the project would contribute its "fair share" of what is required to achieve carbon neutrality of buildings by 2045.

Transportation

GHG emissions from vehicles come from the combustion of fossil fuels in vehicle engines. Decarbonization of the transportation infrastructure serving land use development will come from shifting the motor vehicle fleet to EVs, coupled with a shift to carbon-free electricity to power those vehicles. Land use projects cannot directly control whether and how fast these shifts are implemented, but they can, and do, have an important indirect influence on California's transition to a zero-carbon transportation system. But for that goal to be realistically implemented by 2045, California will need to reduce its per-capita VMT. How land use development is designed and sited can have a significant influence on how much VMT the project would generate." New land use development can influence transportation-related emissions in two areas related to how it is designed and built. First, new land use projects need to provide sufficient EV charging infrastructure to serve the needs of project users who would be driving EVs. Second, new land use projects can influence transportation-related GHG emissions by reducing the amount of VMT associated with the project.

SB 743 was signed into law on September 27, 2013, and changed the way that public agencies evaluate transportation impacts under CEQA. A key element of this law is the elimination of using auto delay, level of service (LOS), and other similar measures of vehicular capacity or traffic congestion as a basis for determining significant transportation impacts under CEQA. The legislative intent of SB 743 was to "more appropriately balance the needs of congestion management with statewide goals related to infill development, promotion of public health through active transportation, and reduction of greenhouse gas (GHG) emissions." On September 28, 2022, the County Board of Supervisors adopted the County of San Diego Transportation Study Guidelines (TSG). The TSG implements the targets of SB 743 in the unincorporated area of San Diego County. The TSG provides screening criteria that can be used to demonstrate whether a project would have a significant VMT impact. These screening criteria were developed based on the OPR Technical Advisory on Evaluating Transportation Impacts in CEQA.

The project consists of 60 multi-family residences. Per the County of San Diego TSG, a project may be screened out from conducting a detailed VMT analysis based on the project's size, location, transit availability, and provision of affordable housing. These screening thresholds are meant to quickly identify when a project should be expected to cause a less than significant impact without conducting a detailed study. The screening threshold criteria used for this project is the Map-Based Screening for Residential Project criteria. Under this criteria, residential projects located within a VMT efficient area may be presumed to have a less than significant impact absent substantial evidence to the contrary. A VMT efficient area for residential projects is any area with an average VMT per resident 15 percent below the baseline average for the entire San Diego County region, including the incorporated cities. Similarly, OPR's technical advisory suggests that lead agencies may screen out VMT using the threshold for Map-Based Screening for Residential

and Office Project, which claims that residential and office projects located in areas with low VMT per capita, and that incorporate similar features (i.e., density, mix of uses, transit accessibility), tend to exhibit similarly low VMT.

The VMT Screening analysis was conducted using the County of San Diego SB-743 Location-Based Screening Maps. Based upon the criterion provided above, the proposed project is located within a VMT efficient area. Therefore, the project would not result in a significant direct or cumulative VMT impact, and the project would be consistent with a locally adopted SB 743 VMT target which reflects the recommendations provided in the Governor's OPR Technical Advisory on Evaluating Transportation Impacts in CEQA.

State regulations and the 2017 and 2022 Scoping Plans' measures that would reduce the project's mobile source emissions include the California Light-Duty Vehicle GHG Standards (AB 1493/Pavley I and II), and the Low Carbon Fuel Standard, and the heavy-duty truck regulations. The approval of the project would be conditioned with the requirement that new residences would meet the 2022 CALGreen Tier 2 voluntary requirements for EV charging infrastructure detailed in Section A4.106.8.1 of the 2022 California Green Building Standards Code (Title 24, Part 11, CALGreen). Tier 2 requires that new single-family residences are constructed with a dedicated 208/240-volt branch circuit, which would provide the necessary infrastructure to accommodate a future EV charger. Adherence to these Tier 2 voluntary requirements would be required prior to issuance of Building Permit predicated on sufficient load capacity from San Diego Gas & Electric (SDG&E) on the project site.

By meeting a locally adopted SB 743 target and complying with the off-street EV requirements in the most recently adopted version of CALGreen Tier 2, the project would contribute its "fair share" of what is required to eliminate GHG emissions from the transportation sector by reducing levels of VMT per capita.

Water

State regulations and the 2017 and 2022 Scoping Plans' measures that would reduce the project's electricity consumption associated with water supply, treatment, and distribution, and wastewater treatment include RPS and CALGreen. The project would be required to reduce indoor water consumption by 20 percent in accordance with CALGreen. Additionally, the project would be subject to all County landscaping ordinance requirements. Consistent with the County Landscaping Ordinance, the project would incorporate climate adapted plants that require occasional, little, or no summer water, excluding edible vegetation and areas using recycled water.

Waste

State regulations and 2017 and 2022 Scoping Plans' measures that would reduce the project's solid waste-related GHG emissions are related to landfill methane control, increases efficiency of landfill methane capture, and high recycling/zero waste. The project would be subject to CALGreen, which requires a diversion of construction and demolition waste from landfills. Additionally, the project would include recycling storage and would divert waste from landfills in accordance with AB 341.

The project's "fair share" contribution toward the statewide goal of carbon neutrality by 2045, combined with the energy efficiency measures that would be implemented as described in Section 6, Energy, the project's consistency with the General Plan (see Section 11, Land Use and Planning), and the project's less than significant impact related to VMT (see Section 17,

Transportation) demonstrates that the project would not make a cumulatively considerable contribution to GHG emissions. Therefore, the project would not generate GHG emissions, either directly or indirectly, that would have a significant impact on the environment, and impacts would be less than significant.

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

8(b) The GPU EIR concluded this impact to be less than significant. As detailed in Section 8(a), the project would provide its "fair share" contribution toward the statewide goal of carbon neutrality by 2045. Furthermore, project emissions would decline beyond the buildout year of the project due to continued implementation of federal, state, and local reduction measures, such as increased federal and state vehicle efficiency standards, and SDG&E's increased renewable sources of energy in accordance with RPS goals. Based on currently available models and regulatory forecasting, project emissions would continue to decline through at least 2050. Given the reasonably anticipated decline in project emissions that would occur post-construction, the project is in line with the GHG reductions needed to achieve the 2045 GHG emissions reduction targets identified by AB 1279.

The 2017 and 2022 Scoping Plans identify state strategies for achieving the state's 2030 and 2045 GHG emissions reduction targets codified by SB 32 and AB 1279, respectively. Measures under the 2017 and 2022 Scoping Plans scenario build on existing programs such as the Low Carbon Fuel Standard, Advanced Clean Cars Program, RPS, Sustainable Communities Strategy (SCS), Short-Lived Climate Pollutant Reduction Strategy, and the Cap-and-Trade Program. The project's compliance with the 2022 Scoping Plan is summarized below and described in further detail in Section 8(a).

- **Energy** – State regulations and 2017 and 2022 Scoping Plans' measures that would reduce the project's energy-related GHG emissions include RPS, Title 24 Energy Efficiency Standards, and CALGreen. The project would be served by SDG&E, which has achieved 44 percent renewables as of 2019. The project's energy related GHG emissions would decrease as SDG&E increases its renewables procurement toward the 2030 goal of 60 percent. Additionally, the project would be constructed in accordance with energy efficiency standards effective at the time building permits are issued and the residences are constructed. As discussed in Section 8(a), the project would contribute its "fair share" of what is required to achieve carbon neutrality of buildings by 2045.
- **Transportation** – State regulations and the 2017 and 2022 Scoping Plans' measures that would reduce the project's mobile source emissions include the California Light-Duty Vehicle GHG Standards (AB 1493/Pavley I and II), and the Low Carbon Fuel Standard, and the heavy-duty truck regulations. These measures are implemented at the state level and would result in a reduction of project-related mobile source GHG emissions. The project would provide EV charging infrastructure consistent with 2022 CALGreen Tier 2 voluntary requirements and would result in less than significant VMT impacts.
- **Water** – State regulations and the 2017 and 2022 Scoping Plans' measures that would reduce the project's electricity consumption associated with water supply, treatment, and distribution, and wastewater treatment include RPS and CALGreen. The project would be required to reduce indoor water consumption by 20 percent in accordance with CALGreen. Additionally, the project would be subject to all County landscaping ordinance requirements.

- **Waste** – State regulations and 2017 and 2022 Scoping Plans' measures that would reduce the project's solid waste-related GHG emissions are related to landfill methane control, increases efficiency of landfill methane capture, and high recycling/zero waste. The project would be subject to CALGreen, which requires a diversion of construction and demolition waste from landfills. Additionally, the project would include recycling storage and would divert waste from landfills in accordance with AB 341.

The project was also evaluated for consistency with the San Diego Forward, which is the Regional Transportation Plan (RTP)/SCS that demonstrates how the region would meet its transportation-related GHG reduction goals. The project would be consistent with San Diego Forward as it would not conflict with implementation of its key goals. San Diego Forward goals include (1) the efficient movement of people and goods, (2) access to affordable, reliable, and safe mobility options for everyone, and (3) healthier air and reduced GHG emissions regionwide. As detailed in Section 8(a), the project is designed to be electric-ready and EV-ready consistent with the 2022 CALGreen Standards, supporting the goal of achieving healthy air and reduced GHG emissions regionwide. Tier 2 voluntary requirements do not require additional EV charging spaces for single-family residential development; however, mandatory standards already require all units to support EV infrastructure. The EV ready circuits would be designed consistent with the CALGreen requirements.

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

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

Conclusion

With regard to the issue area of global climate change, the following findings can be made:

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

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

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

	Significant Project Impact	Impact not Identified by GPU EIR	Substantial New Information
9. Hazards and Hazardous Materials – Would the project:			
a) Create a significant hazard to the public or the environment through the routine transport, storage, use, or	☐	☐	☐

	Significant Project Impact	Impact not Identified by GPU EIR	Substantial New Information
9. Hazards and Hazardous Materials – Would the project:			
disposal of hazardous materials or wastes or through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?			
b) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☐
c) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, or is otherwise known to have been subject to a release of hazardous substances and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☐
d) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐
e) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐
g) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	☐	☐	☐
h) Propose a use, or place residents adjacent to an existing or reasonably foreseeable use that would substantially increase current or future resident's exposure to vectors, including mosquitoes, rats or flies, which are capable of transmitting significant public health diseases or nuisances?	☐	☐	☐

Discussion

9(a) The GPU EIR concluded this impact to be less than significant. Project construction would involve the transport of gasoline and other petroleum-based products associated with construction

equipment. These materials are considered hazardous as they could cause temporary localized soil and water contamination. Incidents of spills or other localized contamination could occur during refueling, operation of machinery, undetected fluid leaks, or mechanical failure. However, all storage, handling, and disposal of these materials are regulated by the California Department of Toxic Substances Control, the U.S. Environmental Protection Agency, and the San Miguel Fire Protection District.

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

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

As previously discussed, the GPU EIR determined impacts from transport, use, and disposal of hazardous materials and accidental release of hazardous materials to be less than significant. 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 project is within 0.25 mile of an existing or proposed school. The closest school, Literacy First Charter School Junior Academy, is approximately 500 feet to the west of the project site. However, the project would not emit hazardous emissions and the transport and handling of minor amounts of hazardous materials during construction and operation would comply with all applicable federal, state, and local regulations that control hazardous material handling. Furthermore, the project is required to comply with applicable regulations pertaining to hazardous waste to ensure that impacts related to hazardous emissions and schools is less than significant.

As previously discussed, the GPU EIR determined impacts from hazards to schools to be less than significant. As the proposed project would have a less than significant impact for the reasons detailed above, the project would be consistent with the analysis 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 a comprehensive review of regulatory databases, the project site has not been subject to a release of hazardous substances. Additionally, the project does not include structures for human occupancy or significant linear excavation within 1,000 feet of an open, abandoned, or closed landfill; is not

located on or within 250 feet of the boundary of a parcel identified as containing burn ash (from the historic burning of trash); and is not on or within 1,000 feet of a Formerly Used Defense Site.

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

9(d) The GPU EIR concluded this impact to be less than significant with mitigation. The project is located within the Gillespie Field Airport Influence Area and the Federal Aviation Administration Height Notification Surface. 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. The project is also located within the Overflight Notification Area established for Gillespie Field. The project is required to record an overflight notification document as a condition of development approval. Impacts would be less than significant.

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

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

9(f)(i) The GPU EIR concluded this impact to be less than significant with mitigation.

OPERATIONAL AREA EMERGENCY PLAN AND MULTI-JURISDICTIONAL HAZARD MITIGATION PLAN:
The project would not interfere with this plan because it would not prohibit subsequent plans from being established or prevent the goals and objectives of existing plans from being carried out.

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

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

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

9(f)(v) DAM EVACUATION PLAN:
The project site is not within a Dam Inundation Zone. Therefore, the project would not impair implementation of or physically interfere with an adopted Dam Evacuation Plan.

As previously discussed, the GPU EIR determined impacts from emergency response and evacuation plans to be less than significant with mitigation. As the project would have a less than

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

9(g) The GPU EIR concluded this impact as significant and unavoidable. The project is within the Wildland-Urban Interface. However, because the project site is not located within a very high fire hazard severity zone, the project dioes not require a Fire Protection Plan. The project would not expose people or structures to a significant risk of loss, injury or death involving wildland fires because the project would comply with the regulations relating to emergency access, water supply, and defensible space specified in the Consolidated Fire Code for the 16 Fire Protection Districts in San Diego County. Implementation of these 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 expose people or structures to a significant risk of loss, injury or death involving wildland fires. Moreover, the project would not contribute to a cumulatively considerable impact, because all past, present and future projects in the surrounding area are required to comply with the Consolidated Fire Code.

As previously discussed, the GPU EIR determined impacts from wildland fires to be significant and unavoidable. As the project would have a less than significant impact with consistency to Mitigation Measure Haz-4.3, the project would be consistent with the analysis in the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance other than the information identified in the GPU EIR.

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

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

Conclusion

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

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

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

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

4. Feasible mitigation measures contained in the GPU EIR (Haz-4.3).

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

	Significant Project Impact	Impact not Identified by GPU EIR	Substantial New Information
10. Hydrology and Water Quality – Would the project:			
k) Expose people or structures to a significant risk of loss, injury or death involving flooding?	☐	☐	☐
l) Expose people or structures to a significant risk of loss, injury or death involving flooding as a result of the failure of a levee or dam?	☐	☐	☐
m) Inundation by seiche, tsunami, or mudflow?	☐	☐	☐

Discussion

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

- Hydrology Report prepared by Snipes-Dye Associates, dated January 2022.
- Stormwater Quality Management Plan for Priority Development Projects (PDP SWQMP) prepared by Snipes-Dye Associates, dated January 2022.

The following responses have incorporated the analysis from the reports.

10(a) The GPU EIR concluded this impact to be significant and unavoidable. Development projects have the potential to generate pollutants during both the construction and operational phases. During the construction phase, the project would prepare and implement a SWPPP. The SWPPP would implement the following typical erosion control BMPs: hydroseeding and street sweeping for erosion control on flat surfaces; storm drain inlet protection, stabilized construction entrance, and sand and gravel bags for sediment control; and measures to control materials management and waste management. The SWPPP would be prepared in accordance with Order No. 2009-009-DWQ, NPDES Order CAS000002 Construction General Permit (CGP) adopted by the State Water Resources Control Board (SWRCB) on September 2, 2009.

During the post-construction phase, as outlined in the PDP SWQMP, the project would implement site design, source control, and structural BMPs to prevent potential pollutants from entering stormwater runoff (see Table 4, Summary of Project Permanent BMPs). The PDP SWQMP has been prepared in accordance with the County of San Diego BMP Design Manual (2019) and San Diego Regional Water Quality Control Board (RWQCB) Order No. R9-2013-0001 Municipal Separate Storm Sewer System (MS4) Permit (2013), as adopted by the RWQCB on May 8, 2013.

Table 4
Summary of Project Permanent BMPs

Type of BMP	Description of BMP
Low-Impact Development Site Design	Trees Planted for the Intercept of Rainfall and Runoff: The project would plant trees per the County of San Diego BMP Design Manual.
	Minimize Impervious Areas: The project proposes multi story buildings to reduce footprint size.

Table 4 Summary of Project Permanent BMPs	
Type of BMP	**Description of BMP**
	Minimize Soil Compaction: Soil compaction would be minimized in areas designed for biofiltration construction.
	Impervious Area Dispersion: The project would drain rooftops to adjacent landscape areas.
	Landscaping with Native or Drought-Tolerant Species: The project site would be landscaped with native and drought-tolerant species pursuant to the landscape plans.
Source Control	Prevent Illicit Discharges into the Municipal Separate Storm Sewer System: The project would provide effective irrigation and dispersion of non-stormwater discharges into landscape.
	Storm Drain Stenciling or Signage: The project would provide prohibitive dumping placards and/or signage and maintain legibility of placards and/or signage. Posted signage would be provided at public access points to deter prohibitive dumping.
	Protect Trash Storage Areas from Rain Fall, Runoff and Wind Dispersal: The project would include trash enclosures on concrete slabs with screened walls and dumpsters with lids.
	Need for Further and Indoor and Structural Pest Control: The project would include building design features that discourage entry of pests
	Landscape/Outdoor Pesticide Use: The project would maintain landscaping with minimal to no pesticide use.
	Air Conditioning Condensate Drain Line: The air conditioning condensate drain line shall discharge into the landscape area and not the storm drain system.
	Roofing and Gutters: The project would avoid roofing, gutters, and trim made of copper or other unprotected metal.
	Plaza, Sidewalks, and Parking Lots: Sidewalks and parking lots shall be swept regularly to prevent the accumulation of litter and debris.
Treatment Control	Biofiltration Basin – The project would install a biofiltration basin to capture and treat runoff.
	Modular Wetland System – The project would utilize a modular wetland system to remove pollutants from stormwater runoff
	Underground Detention – The project would utilize underground detention to detain and slowly release stormwater from the site.
SOURCE: Snipes-Dye Associates 2022 NOTES: BMP = best management practice	

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

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

10(b) The GPU EIR concluded this impact to be significant and unavoidable. The project is located in the El Cajon hydrologic subarea (907.13) of the San Diego hydrologic unit (907). According to the Clean Water Act Section 303(d) list, a portion of this watershed is impaired including the San Diego River (Lower) and Forester Creek. Pollutants of concern in the watershed include selenium, bacteria, manganese, nitrogen, phosphorous and dissolved solids. The project could contribute to release of these pollutants; however, the project would comply with the WPO and implement site design measures, source control BMPs, and structural BMPs to prevent a significant increase of pollutants to receiving waters.

As previously discussed, the GPU EIR determined significant and unavoidable impacts to water quality standards and requirements. However, project would have a less than significant impact to water quality standards and requirements with implementation of the BMPs described in Table 4. 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 Sections 10(a) and 10(b), implementation of BMPs and compliance with required ordinances would ensure that project impacts are less than significant. As previously discussed, the GPU EIR determined significant and unavoidable impacts to water quality standards and requirements and groundwater supplies and recharge. However, the proposed project would have a less than significant impact to water quality standards and requirements and groundwater supplies and recharge with implementation of the source control and treatment control BMPs described in Table 4. 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(d) The GPU EIR concluded this impact to be significant and unavoidable. The project is within the service area of the Helix Water District, which obtains water from surface reservoirs and other imported water sources. The project would not use groundwater for its potable water supply. In addition, the project is located in a developed area and does not involve operations that would interfere substantially with groundwater recharge.

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

10€ The GPU EIR concluded this impact to be less than significant with mitigation. The project would not result in substantial erosion or siltation on- or off-site because stormwater quality management plans are prepared for both the construction and post-construction phases of the development project. During the construction phase, the project would be required to prepare a SWPPP. The SWPPP would implement the following typical erosion control BMPs: hydroseeding and street sweeping for erosion control on flat surfaces; storm drain inlet protection, stabilized construction entrance, and sand and gravel bags for sediment control; and measures to control materials management and waste management.

The SWPPP would be prepared in accordance with Order No. 2009-009-DWQ, NPDES Order CAS000002 CGP adopted by the SWRCB on September 2, 2009. During the post-construction phase, as outlined in the PDP SWQMP dated January 6, 2022, the project would implement site

design, source control and structural BMPs to prevent potential pollutants from entering stormwater runoff. The SWQMP has been prepared in accordance with the County of San Diego BMP Design Manual (2019) and San Diego RWQCB Order No. R9-2013-0001 Municipal Separate Storm Sewer System (MS4) permit (2013), as adopted by the RWQCB on May 8, 2013.

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

Under existing conditions, the project site can be divided into two main drainage basins (A and B). Drainage Basin A consists mainly of surface flows from the residential properties east of the project site and the southerly three-quarters of the site flowing southwest and discharging near the southwest corner of the site and eventually flowing to the existing curb and gutter system on East Bradley Avenue. Drainage Basin B consists of surface flows from the residential properties east of the subject site and the northerly portion of the site flowing west mainly along East Bradley Avenue.

Post construction, drainage patterns would be similar to the existing conditions. Drainage Basin A would be divided into 11 subbasins. Sub-areas A1 through A3 would consist of runoff from the easterly neighboring properties and portions of North First Street that would flow into a new private 18-inch catch basin just east of the site and would be directed into a proposed private 6-inch storm drain system on the project site, bypassing the site and discharging at the southwest corner of the site onto a proposed rock rip-rap energy dissipator. Sub-area A4 would consist of a proposed landscaped slope that runs parallel to the westerly property boundary, where runoff would enter the bypass system via a series of 6-inch atrium grates. Sub-areas A5 and A6 would consist of surface flows from the central half of the site that would be directed towards to a modular wetlands system for storm water quality treatment and then routed into an underground storage system for detention of the 100-year peak flows. Sub-areas A7 through A11 would consist of the east, south, and west of the site where surface flows would be directed into a proposed biofiltration basin located near the southwest corner of the site via concrete ditches. The flow would then be discharged into the proposed rock rip-rap energy dissipator, mixing with the discharges from sub-areas A1 through A6. The runoff from Drainage Basin A would eventually be directed onto East Bradley Avenue approximately 100 feet west of the site through an existing pump system located on the neighboring mini-storage facility property.

Drainage Basin B would be divided into 7 subbasins consisting of surface flows from the residential properties east of the subject site flowing west along East Bradley Avenue and the northerly portion of the site and would eventually discharge onto East Bradley Avenue. Runoff from sub-areas B4 through B7 would surface flow west towards the proposed biofiltration basin located on the northwest corner of the site. The mitigated runoff would outlet through a proposed curb outlet and confluence with the runoff from sub-areas B1 through B3 on East Bradley Avenue. The proposed development of this project would not have a significant impact to the downstream drainage facilities and/or any downstream streams or rivers in a manner which would result in substantial erosion or siltation, since there would be a reduction in the overall post-development runoff from the current condition.

As previously discussed, the GPU EIR determined significant and unavoidable impacts to erosion or siltation. However, the project would have a less than significant impact to erosion or siltation with the implementation of project BMPs, 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(f) The GPU EIR concluded this impact to be less than significant with mitigation. As discussed in Section 10(e) above, the development of the project site would not substantially modify the on-site drainage patterns. Through the use of Low-Impact Development practices and the underground storage system, wetland modular system, and biofiltration basin, there would be a reduction in the overall post-development runoff from the current condition. Therefore, the SWQMP prepared by Snipes-Dye Associates, dated January 6, 2022, determined that the project would not alter the existing drainage pattern in a manner that would result in flooding on- or off-site.

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

10(g) The GPU EIR concluded this impact to be less than significant with mitigation. As discussed in Section 10(e) above, the development of the project site would not substantially modify the on-site drainage patterns. Pursuant to the Hydrology Report prepared by Snipes-Dye Associates and dated January 3, 2022, the project would detain stormwater on-site and would not increase peak flows; therefore, the project would not contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems.

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

10(h) The GPU EIR concluded this impact to be significant and unavoidable. The project has the potential to generate pollutants; however, site design measures, source control BMPs, and treatment control BMPs as indicated in Section 10(a) would be employed such that potential pollutants would be reduced to the maximum extent practicable.

As previously discussed, the GPU EIR determined impacts to water quality standards and requirements as significant and unavoidable. However, the project would have a less than significant impact to water quality standards with the implementation of project conditions listed in Section 10(a). The conditions are consistent with the GPU EIR Mitigation Measures Hyd-1.2 through Hyd-1.5. Therefore, the project would be consistent with the analysis in the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance other than the information identified in the GPU EIR.

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

As previously discussed, the GPU EIR determined impacts from housing within a 100-year flood hazard area as less than significant with mitigation. As the project would have a less than

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

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

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

10(k) The GPU EIR concluded this impact to be less than significant with mitigation. 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 site is not within a Dam Inundation Zone. Therefore, the project would not expose people or structures to a significant risk of loss, injury, or death involving flooding as a result of the failure of a levee or dam.

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

10(m)(i) The GPU EIR concluded this impact to be less than significant with mitigation.

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

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

10(m)(iii) MUDFLOW: Mudflow is type of landslide. Refer to Section 7(a)(iv).

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

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

Conclusion

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

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

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

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

4. Feasible mitigation measures contained in the GPU EIR (Hyd-1.2 through Hyd-1.5) would be applied to the project as BMPs. The mitigation measures, as detailed above, requires compliance with the Guidelines for Determining Significance for Hydrology and Water Quality, as well as for Dam Inundation, the Watershed Protection Ordinance, Stormwater Standards Manual, and the Resource Protection Ordinance.

	Significant Project Impact	Impact not Identified by GPU EIR	Substantial New Information
11. Land Use and Planning – Would the project:			
a) Physically divide an established community?	☐	☐	☐
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☐

Discussion

11(a) The GPU EIR concluded this impact to be less than significant with mitigation. The project does not include the introduction of new infrastructure such as major roadways, water supply systems, or utilities to the area. The proposed project is a major grading permit for the construction of 10 two-story apartment buildings with a landscaped common area, parking stalls, and a concrete paved driveway. The project is surrounded by existing development, including residential, commercial, and light industrial (e.g., storage, trucking) uses. Therefore, the project does not propose any development which would be expected to divide the surrounding established community.

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

11(b) The GPU EIR concluded this impact to be less than significant. The project would develop a 2.94-acre property with 60 multi-family residential units. Under the current land use designation of VR-15, the maximum allowable density is 15 dwelling unit per acre or 44 units for the project site. The project is eligible for a density bonus given that 5 of the 60 units would be dedicated to affordable very low-income housing, consistent with the County's Zoning Ordinance and certified by the GPU EIR. With the 5 very low-income units, the project is eligible for 15 additional units. Therefore, the project is eligible for 64 total units, and the project proposes 60 units. In addition, the density bonus allows for reduction in setbacks, private usable open space, and parking. Therefore, because the project is eligible for a density bonus, which is assumed in the County's Zoning Ordinance, the project would not conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect, including policies of the General Plan and Community Plan.

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

Conclusion

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

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

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

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

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

	Significant Project Impact	Impact not Identified by GPU EIR	Substantial New Information
12. Mineral Resources – Would the project:			
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☐

Discussion

12(a) The GPU EIR determined that impacts to mineral resources would be significant and unavoidable. The California Surface Mining and Reclamation Act required classification of land into Mineral Resource Zones (MRZs). The project site has been classified by the California Department of

Conservation – DMG (Update of Mineral Land Classification: Aggregate Materials in the Western San Diego Production-Consumption Region, 1997) as being within an area of Potential Mineral Resource Significance (MRZ-3). However, the project site has no alluvium or mines and is surrounded by residential, commercial, and light industrial development with institutional (e.g., churches, schools) uses nearby. Therefore, implementation of the project would not result in the loss of availability of a known mineral resource that would be of value since the mineral resource has already been lost due to incompatible land uses.

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

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

Conclusion

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

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

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

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

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

	Significant Project Impact	Impact not Identified by GPU EIR	Substantial New Information
13. Noise – Would the project:			
a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☐
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☐

	Significant Project Impact	Impact not Identified by GPU EIR	Substantial New Information
13. Noise – Would the project:			
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	☐
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	☐
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐
f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐

Discussion

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

General Plan – Noise Element: The Noise Element of the County General Plan includes a noise/land use compatibility matrix for assessing the suitability of different categories of planned land uses based on exterior ambient noise level exposure (Table N-1 from the County General Plan) (County of San Diego 2011). For the project site's zoning designation (Single Family Residential), the Noise Element specifies projects generating a Community Noise Equivalent Level (CNEL) of 60 decibels (dBA) as normally acceptable and up to 75 CNEL as conditionally acceptable. Exterior noise levels up to 65 dBA CNEL are normally acceptable for multi-family residential development. Noise levels exceeding 75 CNEL are generally unacceptable for residential uses. In addition, the County defines a noise standard of 45 dBA CNEL for residential interior areas. A land use in an area identified as "acceptable" indicates that standard construction methods would attenuate exterior noise to an acceptable indoor noise level and that people can carry out outdoor activities with minimal noise interference. For land uses indicated as "conditionally acceptable," structures must be able to attenuate the exterior noise to the indoor noise level limit (45 dBA CNEL). Projects that could produce noise in excess of these noise standards are required to incorporate design measures or mitigation as necessary to comply with the Noise Element.

Noise Ordinance: Sections 36.401 through 36.435 of the Noise Ordinance pertain to noise requirements and enforcement of violations. Section 36.404 of the Noise Ordinance states that the exterior property line noise limits for Single Family Residential zoning is 50 1-hour average dB between 7 a.m. and 10 p.m. and 45 1-hour average dB between 10 p.m. and 7 a.m. Sections

36.408 and 36.409 of the Noise Ordinance state that construction operations shall not occur between 7 p.m. and 7 a.m., on Sundays, or holidays, and that average sound levels shall not exceed 75 dBA for an 8-hour period between 7 a.m. and 7 p.m.

Construction

Construction of the proposed project would have the potential to result in temporary noise level increases as a result of operation of heavy equipment. Based on construction assumptions for similar projects, grading would be the noisiest phase of project construction. The three noisiest pieces of typical construction equipment or this phase (concrete saw, excavator, and dozer) were assumed to operate simultaneously in the same location and would have the potential to generate noise levels up to 84.6 dBA at 50 feet from the construction site (Harris 2023). An average distance of 50 feet from the project boundary is assumed for worst-case noise levels because individual equipment location would vary throughout a given day, and all equipment would not operate in the same location on a given day.

Construction equipment noise would be considered significant if it exceeds an 8-hour average exterior noise level of 75 dBA or a maximum impulsive noise level of 82 dBA at an occupied residential use. Construction activities would take place across the project site within the allowable hours of 7 a.m. and 7 p.m.; thus, noise exposure at individual residences would vary. The nearest receiver, a residence, is approximately 20 feet east of the project site. At this distance, construction would have the potential to reach 88.6 dBA, which exceeds the average exterior noise level of 75 dBA. However, the County would continue to enforce its Noise Ordinance. As such, the project would implement a Construction Noise and Vibration Management Plan to achieve the noise limit specified in San Diego County Code of Regulatory Ordinances, Sections 36.408 and 36.409. Measures to achieve the Noise Ordinance standards would be included on construction plans that are submitted to the County of San Diego Planning and Development Services for approval before issuance of the grading permit. Measures in the Construction Noise and Vibration Management Plan may include but not be limited to the following:

- Construction activities that could generate high noise or vibration levels at receptors shall be scheduled during times that would have the least impact on sensitive receptor locations. This could include restricting construction activities in the areas of potential impact to the middle hours of the workday, such as from 10:00 a.m. to 4:00 p.m., Monday through Friday, when residents are least likely to be home.
- Stationary construction noise sources, such as temporary generators, shall be as far from nearby noise-sensitive receptors as possible.
- Trucks shall be prohibited from idling along streets serving the construction site where noise-sensitive residences are.
- Construction equipment shall be outfitted with properly maintained, manufacturer-approved, or recommended sound and vibration abatement means on air intakes, combustion exhausts, heat dissipation vents, and interior surfaces of engine hoods and power train enclosures.
- Construction laydown and vehicle staging areas shall be positioned (to the extent practical) as far from noise-sensitive land uses as feasible.
- Simultaneous operation of construction equipment shall be limited or construction time shall be limited to within an hour to reduce the hourly average noise level and vibration exposure.
- Temporary sound barriers or sound blankets may be installed between construction operations and adjacent noise-sensitive receptors. Due to equipment exhaust pipes being approximately 7 to 8 feet above ground, a sound wall at least 10 feet in height above grade located along the western and southern property lines between the project and neighboring residences would mitigate noise levels to within acceptable levels. To effectively reduce noise levels, the sound barrier should be constructed of a material with a minimum weight of 2

pounds per square foot with no gaps or perforations and should remain in place until the conclusion of demolition, grading, and construction activities.

The project would be required to comply with the noise level limits in Noise Ordinance Sections 36.408 and 36.409. Because heavy construction equipment would be required near sensitive receptors, a combination of the above measures would be implemented to avoid Noise Ordinance enforcement that may result in the loss of permits. Therefore, the project would comply with the Noise Ordinance, and impacts would be less than significant.

Operation

The project was also evaluated to determine if the addition of project-generated trips would result in a significant direct or cumulative increase in noise at nearby noise sensitive land uses. The project would increase traffic volumes on local roadways, specifically East Bradley Avenue, North Mollison Avenue, and North 1st Street. Noise level increases would be greatest nearest the project site, which would represent the greatest concentration of project-related traffic. Traffic noise is primarily a function of volume, vehicle mix, speed, and proximity. For purposes of this evaluation, the vehicle mix, speed, and proximity are assumed to remain constant. Thus, the primary factor affecting noise levels would be increased traffic volumes.

Typically, a project would have to double the traffic volume on a roadway in order to have a significant direct noise increase of 3 dB or more or to be major contributor to the cumulative traffic volumes. Based on SANDAG Year 2025 traffic projections, traffic volumes on Bradley Avenue, Mollison Avenue, and 1st Street range from 6,600 to 15,900 average daily trips (SANDAG 2024). Using the SANDAG (2002) trip generation rate of 8 trips per dwelling unit for multi-family housing land use, the 60-unit apartment complex project would generate approximately 480 daily trips. The addition of project trips to area roadways would not result in a doubling of traffic volumes and would therefore result in less than a 3 dB increase in noise levels. Therefore, the project would not result in the exposure of noise sensitive land uses to significant noise levels. Implementation of the proposed project would not cause any roadway segment to exceed 60 CNEL or result in an increase of the noise level of 10 CNEL or more above existing noise levels. Therefore, operational noise related to off-site vehicle traffic would be less than significant.

In addition to traffic noise, a multi-family apartment complex project would likely be exposed to and generate occasional nuisance noise (i.e., intermittent or temporary neighborhood noise from sources such as amplified music, barking dogs, and landscape maintenance equipment that may be disturbing to other residents). Section 36.404 of the County Municipal Code contains the noise control standards for the County and prohibits nuisance noise from exceeding the noise standards at any time. Compliance with the County Municipal Code would limit exposure to excessive nuisance noise. Additionally, nuisance noises would be different from each other in kind, duration, and location. Therefore, the overall effects would be separate and, in most cases, would not affect the receptors at the same time. Therefore, operational nuisance noise would not result in a significant impact.

Proposed residential buildings would require heating, ventilation, and air conditioning (HVAC) equipment. Location and equipment specifications are currently unknown. Based on equipment for a similar project, typical HVAC equipment would have the potential to generate noise levels that average 56 dBA at a distance of 7 feet and may run continuously during the day and night (Harris 2023). As such, HVAC equipment could have the potential to generate noise that may exceed the County's hourly noise limit for sensitive receptors of 50 dBA during daytime hours (45 dBA at night). The nearest receptor is a residence, approximately 20 feet east from the property line. At this nearest (worst-case) distance, noise from HVAC equipment would be approximately

47 dBA at the property line, which complies with the County Municipal Code. Therefore, operational noise from the proposed HVAC systems would be less than significant.

Noise sources from the proposed parking stalls could include car alarms, door slams, radios, and tire squeals. These sources typically range from approximately 51 to 66 dBA at a distance of 10 feet and are generally short term and intermittent. Parking stalls have the potential to generate temporary noise levels that exceed 50 dBA, depending on the location of the source; however, noise sources from the parking lot would be different from each other in kind, duration, and location. Therefore, the overall effects would be separate and, in most cases, would not affect noise-sensitive receptors at the same time, and noise generated from the proposed parking lot would not exceed the 1-hour average sound level limit of 50 dBA. Therefore, operational noise from the proposed parking lot would be less than significant.

As previously discussed, the GPU EIR determined impacts to excessive noise levels as less than significant with mitigation. The project would have a less than significant impact 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. Construction techniques that commonly result in excessive vibration, such as blasting and pile driving, are not anticipated for the proposed project. Groundborne vibration occurring as part of the project would result from construction equipment, such as earth movement by trucks. The nearest structure to the project site is an adjacent residence approximately 20 feet to the east. Construction equipment would have the potential to result in groundborne vibration above the Federal Transit Administration threshold of 0.014 inch per second threshold at up to 150 feet from the project construction area. However, off-site exposure to such groundborne vibration would be temporary because it would be limited to the short-term construction period. Additionally, a Construction Noise and Vibration Management Plan would be implemented to achieve Noise Ordinance standards for construction to minimize vibration. Finally, per Section 87.208 of the County's Grading Ordinance, all property owners within 300 feet of the construction area would be notified prior to the start of grading, when the most intense construction would occur, which would reduce nuisance impacts by allowing receptors to prepare. Therefore, temporary impacts would be less than significant. Following construction, operation of the proposed residences would not generate groundborne vibration.

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

13(c) The GPU EIR concluded this impact to be significant and unavoidable. As indicated in the response listed under Section 13(a), implementation of the proposed project would not cause any roadway segment to exceed 60 CNEL or result in an increase of the noise level of 10 CNEL or more above existing noise levels. Additionally, operational noise from the proposed residences, HVAC systems, and parking stalls would be less than significant. As indicated in the response listed under Section 13(a), the project would not expose existing noise-sensitive areas in the project vicinity to a substantial permanent increase in noise levels that exceed the allowable limits of any applicable noise standards. Also, the project would not expose existing noise-sensitive

areas to noise levels of 10 dB CNEL over existing ambient noise levels as required by the County Noise Ordinance.

As previously discussed, the GPU EIR determined impacts from 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. Project operations would not create substantial temporary or periodic increases in ambient noise levels in the project vicinity with implementation of a Construction Noise and Vibration Management Plan. Construction noise would be subject to the County 75 dBA 8-hour average requirement between 7 a.m. and 7 p.m. at the boundary of any occupied property.

As previously discussed, the GPU EIR determined impacts from temporary increase in ambient noise levels to be less than significant with mitigation. As the project would have a less than significant impact, the project would be consistent with the analysis 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 nearest airport to the project site is Gillespie Field approximately 1.1 miles to the northwest. The project is located within the Gillespie Field Airport Influence Area and the Federal Aviation Administration Height Notification Surface. However, the project site is outside the noise contours for Gillespie Field (ALUC 2010). As such, the project would not expose residents to excessive noise levels and less than significant impacts would occur. Therefore, the project would be consistent with the analysis in the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance other than the information identified in the GPU EIR.

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

Conclusion

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

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

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

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

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

	Significant Project Impact	Impact not Identified by GPU EIR	Substantial New Information
14. Population and Housing – Would the project:			
a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☐
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	☐	☐	☐

Discussion

14(a) The GPU EIR concluded this impact to be less than significant. The General Plan Land Use Designation for the project site is Village Residential (VR-15), which allows for 15 units per acre. The Zoning Use Regulation for the site is Residential Variable (Rv). The project would develop a 2.94-acre property with 60 multi-family residential units. Under the current designation, the maximum allowable density is 15 dwelling unit per acre or 44 units for the project site. The project is eligible for a density bonus given that 5 of the 60 units would be dedicated to affordable very low-income housing, consistent with the County's Zoning Ordinance and certified by the GPU EIR. With the 5 very low-income units, the project is eligible for 15 additional units. Therefore, the project is eligible for 64 total units, and the project proposes 60 units. In addition, the density bonus allows for reduction in setbacks, private usable open space, and parking. Therefore, because the project is eligible for a density bonus, which is assumed in the County's Zoning Ordinance, the project would be consistent with the allowable density, and thus, would not induce substantial unplanned population growth in the area as development of the site was accounted for within the GPU. In addition, the project does not propose any physical or regulatory change that would remove a restriction to or encourage population growth in the area.

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

14(b) The GPU EIR concluded this impact to be less than significant. The project would require the demolition of one existing single-family residence but would not result in the displacement of a substantial amount of existing housing. As such, replacement housing would not be required elsewhere.

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

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

14(c) The GPU EIR concluded this impact to be less than significant. The GPU EIR concluded this impact to be less than significant. The project would require the demolition of an existing single-family residence. The project would result in a net gain of 59 units. As such, replacement housing would not be required elsewhere.

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

Conclusion

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

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

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

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

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

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

Discussion

15(a) The GPU EIR concluded this impact to be less than significant with mitigation for all public services with the exception of school services, which would remain potentially significant and unavoidable. The project does not involve the construction of new or physically altered governmental facilities including but not limited to fire protection facilities, sheriff facilities, schools, or parks to maintain acceptable service ratios, response times, or other performance service ratios or objectives for any public services. Therefore, the project would not have an adverse

effect on the environment because the project does not require new or significantly altered services or facilities to be constructed.

Fire and emergency protection would be provided by the San Miguel Fire Protection District, which has indicated that it has sufficient capacity to serve the project. The nearest fire station is the San Miguel Fire Protection District Station 19, located at 727 East Bradley Avenue, El Cajon, CA 92021, approximately 1.1 miles (driving) west of the project site. Police protection would be provided by the San Diego County Sheriff's Department.

Pursuant to the service availability letter from the La Mesa Spring Valley School District, students living within this community would attend schools of the district. All applicable school fees to the La Mesa Spring Valley School District would be required to be paid prior to the issuance of a building permit for each individual residence.

The project's effect on public parks is discussed in response 16(a) and response 16(b).

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

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

Conclusion

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

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

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

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

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

	Significant Project Impact	Impact not Identified by GPU EIR	Substantial New Information
16. Recreation – Would the project:			
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☐
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?	☐	☐	☐

Discussion

16(a) The GPU EIR concluded this impact to be less than significant with mitigation. The project would increase the use of existing parks and other recreational facilities for new project residents; however, the project would be subject to Park Land Dedication Ordinance fees. 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.

16(b) The GPU EIR concluded this impact to be less than significant with mitigation. While the project does not include the construction of new active recreational facilities, the project would include common open space. Given the limited scope of these common open space uses, the construction of these on-site recreational facilities would not have an adverse physical effect on the environment. 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 recreation, the following findings can be made:

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

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

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

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

	Significant Project Impact	Impact not Identified by GPU EIR	Substantial New Information
17. Transportation and Traffic – Would the project:			
a) Conflict with an applicable plan, ordinance or policy establishing measures of the effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths and mass transit?	☐	☐	☐
b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the County congestion management agency for designated roads or highways?	☐	☐	☐
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	☐	☐	☐
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☐
e) Result in inadequate emergency access?	☐	☐	☐
f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	☐	☐	☐

Discussion

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

SB 743 was signed into law on September 27, 2013, and changed the way that public agencies evaluate transportation impact under CEQA. A key element of this law is the elimination of using auto delay, LOS, and other similar measures of vehicular capacity or traffic congestion as a basis for determining significant transportation impacts under CEQA. The legislative intent of SB 743

was to “more appropriately balance the needs of congestion management with statewide goals related to infill development, promotion of public health through active transportation, and reduction of greenhouse gas (GHG) emissions.” According to the law, “traffic congestion shall not be considered a significant impact on the environment” within CEQA transportation analysis.

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

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

On September 28, 2022, the County Board of Supervisors adopted the County of San Diego TSG. The TSG implements the requirements of SB 743 in the unincorporated area of San Diego County. The TSG provides screening criteria that can be used to determine whether a project would have a significant VMT impact. These screening criteria were developed based on the OPR Technical Advisory on Evaluating Transportation Impacts in CEQA.

The project consists of 60 multi-family residential units. Per the County of San Diego TSG, a project may be screened out from conducting a detailed VMT analysis based on the project’s size, location, transit availability, and provision of affordable housing. These screening thresholds are meant to quickly identify when a project should be expected to cause a less than significant impact without conducting a detailed study. The screening threshold criteria used for this project is the Map-Based Screening for Residential Project criteria. Under this criteria, residential projects located within a VMT efficient area may be presumed to have a less than significant impact absent substantial evidence to the contrary. A VMT efficient area for residential projects is any area with an average VMT per resident 15 percent below the baseline average for the entire San Diego County region, including the incorporated cities. Similarly, OPR’s technical advisory suggests that lead agencies may screen out VMT using the threshold for Map-Based Screening for Residential and Office Project, which claims that residential and office projects located in areas with low VMT per capita, and that incorporate similar features (i.e., density, mix of uses, transit accessibility), tend to exhibit similarly low VMT.

The VMT Screening analysis was conducted using the County of San Diego SB-743 Location-Based Screening Maps. Based upon the criterion provided above, the proposed project would be screened out from conducting a VMT analysis as the proposed project is located within a VMT efficient area (Appendix D). Therefore, the project would not require further VMT analysis and would not result in a significant direct or cumulative VMT impact, and mitigation measures are not required. Therefore, the project would not conflict with an applicable plan, ordinance or policy establishing measures of the effectiveness for the performance of the circulation system and impacts would be less than significant.

As previously discussed, the GPU EIR determined significant and unavoidable impacts to unincorporated County traffic and LOS standards. As the project would have a less than significant impact for reasons stated above, the project would be consistent with the analysis in

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

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

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

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

17(c) The GPU EIR concluded this impact to be less than significant with mitigation. The project site is located within the Gillespie Field Airport Influence Area. 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 project includes frontage improvements along the south side of East Bradley Avenue from Mollison Avenue and North First Street including the construction of sidewalk, curb, and gutter. The proposed Bradley Road improvements and private driveway from Bradley Avenue would meet County design standards with improved sight lines.

As previously discussed, the GPU EIR determined impacts on rural road safety to be significant and unavoidable. The project would have a less than significant impact as improvements would not result in changes to roadway design that would cause increased hazards. Therefore, the project would be consistent with the analysis in the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance other than the information identified in the GPU EIR.

17(e) The GPU EIR concluded this impact to be less than significant with mitigation. The project would not result in inadequate emergency access. Access would be from a private 24-foot-wide driveway connecting to East Bradley Avenue and would be constructed to meet County Fire Code Standard 503.2.6. In addition, consistent with GPU EIR Mitigation Measure Tra-4.2, the project would implement the Building and Fire Codes to ensure emergency vehicle accessibility.

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

17(f) The GPU EIR concluded this impact to be less than significant with mitigation. The project includes frontage improvements along East Bradley Avenue that would construct a pedestrian sidewalk. The project does not include any improvements which would inhibit the future performance of these pedestrian and bike facilities. Therefore, the project would not conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities.

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

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

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

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

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

4. Feasible mitigation measures contained in the GPU EIR (Tra-4.2) would be applied to the project. The project-specific mitigation measures, as detailed above, would require the project applicant to comply with the County Public Road Standards and Guidelines for Determining Significance, coordinate with other jurisdictions to identify appropriate mitigation, and implement the Building and Fire Codes to ensure adequate services are in place.

	Significant Project Impact	Impact not Identified by GPU EIR	Substantial New Information
18. Utilities and Service Systems – Would the project:			
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	☐	☐	☐
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing	☐	☐	☐

	Significant Project Impact	Impact not Identified by GPU EIR	Substantial New Information
18. Utilities and Service Systems – Would the project:			
facilities, the construction of which could cause significant environmental effects?			
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☐
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	☐	☐	☐
e) Result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☐
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	☐	☐	☐
g) Comply with federal, state, and local statutes and regulations related to solid waste?	☐	☐	☐

Discussion

18(a) The GPU EIR concluded this impact to be less than significant with mitigation. Sewer service would be provided by Wintergardens Sanitation District that indicated that it has sufficient capacity to serve the project. Therefore, the project would be consistent with the wastewater treatment requirements of the RWQCB.

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

18(b) The GPU EIR concluded this impact to be less than significant with mitigation. The project requires water service from the Helix Water District, which has indicated that there are adequate water resources and entitlements are available to serve the project. The project includes the construction of a new 8-inch sewer and 8-inch water main to provide connection to the project site. The construction of the new lines would not cause significant environmental impacts beyond those already identified in other sections of this environmental analysis.

The GPU EIR determined impacts associated with new water and wastewater treatment facilities to be less than significant with mitigation. As the project would have a less than significant, the project would be consistent with the analysis in the GPU EIR because it would not create new

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

18(c) The GPU EIR concluded this impact to be less than significant with mitigation. The project involves new stormwater drainage facilities; however, these facilities would not result in additional adverse physical effects beyond those already identified in other sections of this environmental analysis (refer to Section 10, Hydrology and Water Quality).

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.

18(d) The GPU EIR concluded this impact to be significant and unavoidable. The project would receive water from the Helix Water District, which has indicated it has adequate water to serve the project. As the project would have a less than significant impact, the project would be consistent with the analysis provided in the GPU EIR because it would not increase impacts identified in the GPU EIR.

18(e) The GPU EIR concluded this impact to be less than significant with mitigation. The project would be served by the Wintergarden Sanitation District, which has indicated it has sufficient capacity to serve the project. Therefore, the project would not interfere with any wastewater treatment provider's service capacity.

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

18(f) The GPU EIR concluded this impact to be significant and unavoidable. All solid waste facilities, including landfills, require solid waste facility permits to operate. There are five, permitted active landfills in San Diego County with remaining capacity to adequately serve the project. Therefore, the project would be consistent with the analysis in the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance other than the information identified in the GPU EIR.

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

Conclusion

With regard to the issue area of utilities and service systems, the following findings can be made:

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

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

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

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

	Significant Project Impact	Impact not Identified by GPU EIR	Substantial New Information
19. Wildfire – If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:			
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☐
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts in the environment?	☐	☐	☐
d) Expose people or structures to significant risk, including downslopes or downstream flooding or landslides, as a result of runoff, post-fire instability, or drainage changes?	☐	☐	☐

Discussion

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

19(a) The GPU EIR concluded this impact to be significant and unavoidable. The site is located within local responsibility area (LRA). The project site is within the authority of the San Miguel Fire Protection District and is located approximately 1.1 miles from the nearest fire station, which is San Miguel Fire District Station 19, located at 727 East Bradley Avenue, El Cajon, California. The San Miguel Fire Protection District has indicated that the station has sufficient capacity to serve the project.

As previously stated, wildfire was analyzed in GPU EIR 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.

19(b) The GPU EIR concluded this impact to be significant and unavoidable. The project is within the unzoned fire hazard severity zone and within the Wildland-Urban Interface. The project would comply with regulations relating to emergency access, water supply, and defensible space specified in the County Fire Code and Consolidated Fire Code. Implementation of these fire safety standards would occur during the building permit process and is consistent with GPU EIR mitigation measure Haz-4.3. The project is immediately surrounded by developed, urban uses, such as residential, commercial, and light industrial uses. In addition, the project is consistent with the Zoning Ordinance and the allowable development density established under the GPU with the density bonus. Therefore, for the reasons stated above, the project would not be expected to experience exacerbated wildfire risks due to slope, prevailing, winds or other factors.

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

19(c) The GPU EIR concluded this impact to be significant and unavoidable. The project would require the installation and maintenance of the new private driveway. The project also requires utility connections for service from the Helix Water District and the Wintergarden Sanitation District. These proposed improvements would not exacerbate fire risk. All infrastructure associated with the project has been incorporated within this analysis. Therefore, no additional temporary or ongoing impacts to the environment related to associated infrastructure would occur that have not been analyzed in other sections of this environmental document.

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

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

The GPU EIR concluded significant and unavoidable impacts associated with wildfire under Section 2.7, Hazards and Hazardous Materials. However, the proposed project would have a less than significant impact for the reasons detailed above. Therefore, the project would be consistent with the analysis in the GPU EIR because it would not create new impacts or increase impacts,

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

Conclusion

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

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

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

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

4. Feasible mitigation measures contained in the GPU EIR (Haz-4.3) and project conditions of approval by the Vista Fire Protection District would be applied to the project. These mitigation measures, as detailed above, requires the project applicant to implement brush management and comply with the Building and Fire Codes.

Appendices

Appendix A – References

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

Appendix C – CalEEMod Output Sheets

Appendix D – County of San Diego SB-743 Location-Based Screening Maps

Appendix A

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

Snipes-Dye Associates. 2022. Hydrology Report. January

Snipes-Dye Associates 2022. Stormwater Quality Management Plan for Priority Development Projects January 2022

Soil Testers. 2022. Geotechnical Investigation March.

References

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

BAAQMD. Justification Report: CEQA Thresholds for Evaluating the Significance of Climate Impacts from Land Use Projects and Plan (April 2022).

CAPCOA. California Emissions Estimator Model 2020.4.0 (2021).

County of San Diego. (2007). Guidelines for Determining Significance and Report Format and Content Requirements, Air Quality. https://www.sandiegocounty.gov/content/dam/sdc/pds/ProjectPlanning/docs/AQ-Guidelines.pdf.

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

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

County of San Diego. Climate Action Plan (2018).

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.