



County of San Diego

PLANNING & DEVELOPMENT SERVICES

5510 OVERLAND AVENUE, SUITE 310, SAN DIEGO, CA 92123

(858) 505-6445 GENERAL • (858) 694-2705 CODES

(858) 565-5920 BUILDING SERVICES

WWW.SDCPDS.ORG

VINCE NICOLETTI
DIRECTOR

February 13, 2025

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

Project Name: Jamacha Commercial Office Building
Project Record Numbers: PDS2018-STP-18-009
Environmental Log Number: PDS2018-ER-18-19-001

APN(s): 579-300-32-00 & 579-300-33-00

Lead Agency Name and Address:

County of San Diego
Planning & Development Services
5510 Overland Avenue, Suite 210
San Diego, CA 92123-1239

County Staff Contact:

Alexandro Barrenechea, Project Manager
(619) 323-8709
Alexandro.Barrenechea@sdcounty.ca.gov

Project Applicant Name and Address:

Light House Builders Inc., A California Corporation (Entity No. 3898250)
Mark Khouli, Agent for Service of Process
1620 La Presa Avenue
Spring Valley, CA 91977

General Plan

Community Plan:	Spring Valley Community Plan
Regional Categories:	N/A
Land Use Designations:	Office Professional
Density:	N/A
Floor Area Ratio (FAR):	N/A

Zoning

Use Regulation:	Office-Professional (C30)
Minimum Lot Size:	N/A

Special Area Regulation: B, C

Project Description

Location:

The proposed project is located within the unincorporated portion of San Diego County in the community of Spring Valley. The project is specifically located south of intersection of Jamacha Boulevard and San Juhn Street, with the street address 9619 Jamacha Blvd. Spring Valley, CA 91977 in an approximate 1.1-acre site. The project site is located within the South County Multiple Species Conservation Plan (MSCP) Plan Area in the Metro-Lakeside-Jamul segment. However, the project site is outside of the Pre-Approved Mitigation Area (PAMA). Jamacha Blvd. and residential single-family lots are located to the north, east and southeast of the project, and to the west and southwest are civic uses, a religious assembly facility and an elementary school.

Project Description:

The proposed project, Jamacha Office Building, consists of the construction of a new 12,000 square-foot (sf) commercial office structure on two parcels (APNs 579-300-32-00 and 579-300-33-00). The area for both parcels is approximately 47,897 sf (1.08 acres). The project would include 57 paved parking spaces, of which 28 would be equipped with electric vehicle (EV) charging stations (EVCS), and of those 28, nine would be equipped with electric vehicle supply equipment (EVSE). The project would also include on-site landscaping including tree plantings surrounding the proposed office building and parking lot. Project access would be provided from one new driveway on Jamacha Boulevard across from and in alignment with San Juhn Street. The project site is currently vacant. Project grading would include 1,000 cubic yards of excavation cuts, 2,000 cubic yards of fill, and 1,000 cubic yards of waste/import.

Overview of 15183 Checklist

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

General Plan Update Program EIR

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

the character of communities within the unincorporated County. The SDCWA service area covers approximately the western one third of the unincorporated County. The SDWCA boundary generally represents where water and wastewater infrastructure currently exist. This area is more developed than the eastern areas of the unincorporated County and would accommodate more growth under the GPU.

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

Summary of Findings

The project is consistent with the analysis performed for the GPU EIR. Further, the GPU EIR adequately anticipated and described the impacts of the Modified Project, identified applicable mitigation measures necessary to reduce project-specific impacts, and the Modified Project implements these mitigation measures (see [GPU-EIR-mitg-measures+summary-15183ref.pdf](#) for complete list of GPU Mitigation Measures).

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

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

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

The project includes construction of a 12,000-sf commercial office building and associated parking lot. The project would not change the Office Professional (C30) land use designation and zoning of the site. The project is consistent with the density of the General Plan and Zoning Ordinance.

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

The subject property is no different than other properties in the surrounding area, and there are no project-specific effects which are peculiar to the project or its site. The project site is in an area developed with single-family residential, commercial, and institutional (i.e., church, school) uses. The property does not support any peculiar environmental features, and the project would not result in any peculiar effects.

In addition, as explained further in the 15183 Exemption Checklist below, all project impacts were adequately analyzed by the GPU EIR. The project could result in potentially significant impacts to Biological Resources, Cultural Resources, Noise, and Transportation. However, applicable mitigation measures specified within the GPU EIR have been made conditions of approval for 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 an incremental part of the growth that was forecast for build-out of the General Plan. The GPU EIR considered the 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, the project as analyzed does not result in new information which would result in a determination of a more severe impact than what had been anticipated by the GPU EIR.

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

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

Signature

Date

Alexandro Barrenechea

Project Manager

CEQA Guidelines §15183 Exemption Checklist

Overview

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

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

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

A summary of staff’s analysis of each potential environmental effect is provided below the checklist for each subject area. A list of references, significance guidelines, and updated technical studies used to support the analysis is attached.

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

Discussion

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

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

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

The project site is north and west of the Sweetwater River Floodplain identified by the Spring Valley Community Plan as an RCA. The project site is less than 1,000 north and west of the Sweetwater River Floodplain; however, the project site is not visible from this RCA due to the surrounding topography and intervening structures.

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

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

The project site is not within the vicinity of a state-designated scenic highway. The nearest State designated scenic highway to the project site is State Route 94, located approximately 2.62 miles to the north. Therefore, would not have any impacts to scenic resources within a state scenic highway.

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

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

The majority of the properties surrounding the project site are developed with single-family residential, commercial, and education/institutional uses. The visual character surrounding the project site is characterized by medium density residential land uses, a church, an elementary school, and a small commercial strip center.

The project would not detract from, or contrast with the existing visual character and/or quality of the surrounding areas. The commercial use type and density are consistent with the Office Professional (C30) land use designation and with the County Zoning Ordinance. The site will include 48 paved parking spaces, along with on-site landscaping including tree plantings. The resulting uses on the project site would be similar to those developed in the surrounding area. The proposed design of the development footprint would be compatible with uses in the immediate area. By resulting in a development similar to the existing visual environment, the project would not result in any change to visual character.

As previously discussed, the GPU EIR determined impacts on visual character or quality to be significant and unavoidable. 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 impacts from new source of substantial light or glare, which would adversely affect day or nighttime views in the area to be significant and unavoidable. The project would develop a 12,000-sf office building and an associated parking lot. However, the project site is not located within Zone A of the County of San Diego Light Pollution Code (within 15 miles of the Mount Laguna Observatory or the Palomar Observatory). The project would not adversely affect nighttime views or astronomical observations because the project would be required to conform to the 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b) Conflict with existing zoning for agricultural use, or a Williamson Act contract? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| c) Conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland zoned Timberland Production? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| d) Result in the loss of forest land, conversion of forest land to non-forest use, or involve other changes in the existing environment, which, due to their location or nature, could result in conversion of forest land to non-forest use? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| e) Involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Important Farmland or other agricultural resources, to non-agricultural use? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Discussion

2(a) The GPU EIR concluded this impact to be significant and unavoidable. The project site is zoned Single Family Residential (RS) 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 Office Professional (C30); 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 more than 6 miles northeast of the project site. Due to distance, no land use interface conflicts would occur. Additionally, the project is for the development of an office building, which is compatible with the surrounding residential, commercial, and institutional use types as well as the existing land use and zoning designations for the site. 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 (NOP) 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. The outer edge of the Cleveland National Forest is located approximately 20.4 miles to the east of the project site. Thus, due to distance, the project would have no impact on the forest. In addition, the County of San Diego does not have any existing Timberland Production Zones. Therefore, project implementation would not conflict with existing zoning for, or cause rezoning of, forest land, timberland, or Timberland Production Zones.

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

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

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

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

Conclusion

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

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

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

Discussion

Construction-related and operational air emissions resulting from the proposed project were estimated in an Air Quality Assessment prepared for the project by Scientific Resources Associated (SRA) on July 11, 2023 (Appendix A). 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 (O₃) as well as the state standards for O₃, particulate matter less than or equal to 10 microns (PM₁₀), and particulate matter less than or equal to 2.5 microns (PM_{2.5}). The RAQS and the region’s portion of the SIP are the region’s plans for attainment and maintaining air quality standards. The RAQS and SIP rely on information from the California Air Resources Board (CARB) and San Diego Association of Governments (SANDAG), including projected growth, to project future emissions and determine from that the strategies necessary for the reduction of stationary source emissions through regulatory controls. Projects that propose development that is consistent with the land use designations and growth anticipated by the local general plans and SANDAG are, by definition, consistent with the RAQS and SIP.

The project would include construction activities for and operation of a 12,000-sf office building and associated parking lot. 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 would include 650 cubic yards of cut, 3,600 cubic yards of fill, and 2,950 cubic yards of import. The project is consistent with the density established under the County General Plan and certified by the GPU EIR. Therefore, because the project would not increase the density or intensity of the land assumed in the GPU EIR and would not result in growth beyond that assumed in SANDAG’s growth assumptions or in the General Plan projections, the project would not conflict with or obstruct implementation of the RAQS or SIP.

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

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

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

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 California Emissions Estimator Model (CalEEMod) 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 (PM₁₀), 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.

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 trackout/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 12 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: grading, building construction, architectural coatings, and paving. CalEEMod default construction equipment and usage were modeled. Table 3, Construction Parameters, summarizes the modeled construction parameters.

Table 3 Construction Parameters				
Construction Phase	Phase Duration (Days)	Equipment	Amount	Hours per Day
Grading	21	Off-Highway Trucks	1	8
		Graders	1	6
		Rubber-Tired Dozers	1	6
		Tractors/Loaders/Backhoes	1	7
Paving	86	Cement/Mortar Mixer	1	6
		Tractors/Loaders/Backhoes	1	8
		Pavers	1	6
		Paving Equipment	1	8
		Rollers	1	7
Building Construction	154	Cranes	1	6
		Forklifts	1	6
		Generator Sets	1	8
		Tractors/Loaders/Backhoes	1	6
		Welders	3	8
Architectural Coatings	23	Air Compressor	1	6

SOURCE: CalEEMod Output, Attachment 1 in Appendix A.

Construction activities would be subject to several control measures per the requirements of the County, SDAPCD Rules, and 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 trackout from paved surfaces daily or more frequently as necessary.
 - Minimize the trackout 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.

Table 4, Summary of Maximum Construction Emissions (pounds per day), presents the total projected construction maximum daily emission levels for each criteria pollutant. Note that the emissions summarized in Table 4 are the maximum emissions for each pollutant that would occur during each phase based on all modeled construction equipment (refer to Table 3) 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 4, 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 12 months. Therefore, the project would not violate any air quality standard or contribute substantially to an existing or projected air quality violation.

Table 4 Summary of Maximum Construction Emissions (pounds per day)						
	Pollutant					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}

Grading	1.77	18.97	9.13	0.02	2.34	1.13
Building Construction	1.88	14.28	13.43	0.02	0.84	0.70
Paving	0.84	7.77	9.20	0.01	0.53	0.41
Architectural Coatings	3.96	1.54	1.90	0.00	0.11	0.10
Maximum Daily Emissions	5.84	22.05	22.63	0.04	5.51	3.25
County Screening Level Thresholds	75	250	550	250	100	55
<i>Significant Impact?</i>	<i>No</i>	<i>No</i>	<i>No</i>	<i>No</i>	<i>No</i>	<i>No</i>

Operational Emissions

The project would include construction activities for and operation of a 12,000-sf office building. The main operational impacts associated with the Project would include impacts associated with traffic; additional emissions would be associated with energy use and area sources such as landscaping. Project-generated traffic was estimated based on SANDAG trip generation rates for office buildings (SANDAG 2002), assumed to be 10 trips per 1,000 sf per day on weekdays, resulting in 120 total trips per day. The traffic analysis (Appendix E) estimated 9.74 trips per 1,000 sf; therefore, the analysis presented in the Air Quality Assessment is slightly more conservative. The area source emissions include emissions attributable to the use of landscaping equipment and painting for maintenance purposes. Based on CalEEMod model defaults, it was assumed that 10% of the surface area of the development would be painted annually for maintenance. Table 5, Summary of Project Operational Emissions (pounds per day), presents daily operational emissions associated with the building. As shown in Table 5, 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 5 Summary of Project Operational Emissions (pounds per day)						
	Pollutant					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Area Sources	0.29	0.00	0.00	0.00	0.00	0.00
Energy Use	0.01	0.07	0.05	0.00	0.00	0.00
Vehicular Emissions	0.19	0.76	2.03	0.01	0.61	0.17
Total Operational Emissions	0.48	0.82	2.09	0.01	0.62	0.17
SDAPCD Threshold	75	250	550	250	100	55
<i>Significant Impact?</i>	<i>No</i>	<i>No</i>	<i>No</i>	<i>No</i>	<i>No</i>	<i>No</i>

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

Cumulative impacts could occur if the most intensive phases of construction for the proposed project occur simultaneously with other intensive phases of proposed projects within 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 PM₁₀. As

discussed in the Air Quality Assessment (Appendix A), the project's maximum daily emissions of PM₁₀ was estimated to be 5.51 pounds/day, which would be well below the County's SLT of 100 pounds/day for PM₁₀ during construction activities (refer to Table 4). 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 PM₁₀ 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 PM₁₀, PM_{2.5}, NO_x, and VOC emissions from construction/grading activities; however, it would not exceed established SLTs (refer to Section 3(b)). As described above, the County's SLTs align with attainment of the NAAQS which were developed to protect the public health, specifically the health of "sensitive" populations, including asthmatics, children, and the elderly. 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. Therefore, project construction would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard, and impacts would be less than significant.

The project would generate PM₁₀, PM_{2.5}, and NO_x emissions during project operations primarily from mobile sources (i.e., vehicle trips), and VOCs from area and mobile sources. However, as previously described, operational emissions of all pollutants would be below the County's recommended SLTs. As described above, the County's SLTs align with attainment of the NAAQS which were developed to protect the public health, specifically the health of "sensitive" populations, including asthmatics, children, and the elderly. Therefore, project operation would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard, and impacts would be less than significant.

Two projects were identified within one-quarter mile of the site:

- Car Sales Office (APN 584-420-30-00): Remove existing 372-sf car sales office building and provide a new 869-sf auto sales office and retail area
- Arco – Jamacha Gas Station (APN 579-191-67-00): Construction of 2,400-sf food mart building and 3,200-sf auto fueling canopy with dispensers and islands

Both of the projects above are smaller in size than the proposed project. No information is available to quantify the emissions from the two projects; however, even if the maximum simultaneous emissions were of a similar order of magnitude to the emissions from construction of the project, the cumulative emissions would remain below the County's significance thresholds. The cumulative projects would be required to comply with the same emission standards and rules that the project would. The project's emissions are substantially below the significance thresholds. Due to the distance of the project site to the cumulative project, impacts would be limited to localized areas. The project will include a condition for the County to coordinate construction schedules to avoid simultaneous earthwork. Cumulative impacts would be less than cumulatively considerable.

The project is proposing development that is consistent with the County General Plan; thus, operational air emissions are considered to have been accounted for in the GPU EIR. The RAQS and SIP were prepared consistent with growth forecasts in the County General Plan. Further, as described under Section 3(b), project construction and operations would not result in emissions of criteria air pollutants greater than the County's SLTs. The Traffic Impact Study (Appendix E) concluded that no direct impacts on level of service (LOS) would result from the project. Given that the project would not cause road intersections to operate at or below a LOS E, it would not create a CO hot spot, or cumulatively

considerable net increase of CO. 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 including single-family residences (as near as approximately 85 feet to the east), the Kingdom Hall of Jehovah's Witnesses (approximately 155 feet to the west), and La Presa Elementary School (approximately 360 feet to the southwest, to the nearest school building).

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 12-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.

During construction, diesel equipment would not be operating all at once on-site and would be moved across the project site as construction goes on; therefore, construction near individual receptors would be temporary and would vary by day. As such, due to the limited time of exposure, project construction is not anticipated to create conditions where the probability is greater than 10 in 1 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. Based on the results of the Health Risk Assessment using the U.S. Environmental Protection Agency (USEPA) approved air dispersion model, AERMOD, the maximum excess cancer risk predicted at the nearest receptor would be 8.6 in 1 million without implementation of Toxics Best Available Control Technology (T-BACT). Without T-BACT, this value is above the screening threshold of 10 in one million. However, with implementation of T-BACT, impacts would be reduced to 8.6 in 1 million, below the County of San Diego's significance threshold of 10 in 1 million.

In accordance with the County of San Diego Planning and Development Services (PDS) project requirements to comply with County impact guidelines, the project will request the construction contractor to provide a construction fleet that uses any combination of diesel catalytic converters, diesel oxidation catalysts, diesel particulate filters and/or CARB certified Tier III or IV equipment. Because the exact mix of construction equipment within the fleet is unknown at this time, it is not possible to precisely model construction equipment within the CalEEMod model. However, for conservative purposes, the model was

run assuming all heavy construction equipment would meet Tier III emission standards. This measure would reduce overall construction equipment emissions by approximately 1.3%. Thus, the risk would be reduced by 1.3% to 8.5 in 1 million, which is below the County's significance threshold of 10 in 1 million with application of T-BACT. It should be noted that CalEEMod utilizes default assumptions about the makeup of the construction fleet within the San Diego region to calculate construction emissions from heavy construction equipment. The fleet assumptions for 2021 (the assumed year of construction) already include Tier III and Tier IV equipment. The risk associated with exposure to diesel particulate from construction of the project is therefore not significant.

Additionally, with ongoing implementation of USEPA 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.

Vehicular traffic may result in emissions of toxic air contaminants (TACs). Minor amounts of TACs are found in light-duty vehicle exhaust; however, the main source of on-road TACs is from diesel-powered heavy-duty trucks. Because the project is an office building, the amount of truck traffic would be minimal, and no risks to surrounding sensitive receptors would be anticipated from project operations.

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 associated with diesel heavy equipment exhaust during construction of the office building. Because the construction equipment would be operating at various locations throughout the construction site, and because any operation that would occur in the vicinity of existing receptors would be temporary, impacts associated with odors during construction are not considered significant. 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or US Fish and Wildlife Service? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| e) Conflict with the provisions of any adopted Habitat Conservation Plan, Natural Communities Conservation Plan, other approved local, regional or state habitat conservation plan or any other local policies or ordinances that protect biological resources? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Discussion

Potential impacts to biological resources resulting from the proposed project were analyzed in a Biological Resource Letter Report prepared for the project by Klutz Biological Consulting on December 11, 2018 (Appendix B). The following responses have incorporated the analysis from the report.

- 4(a) The GPU EIR concluded this impact to be significant and unavoidable. The 2018 survey completed by Klutz Biological Consulting detected the presence of one invertebrate species (unknown sulphur butterfly) and two bird species (common raven [*Corvus corax*] and house finch [*Carpodacus mexicanus*]). All species observed in the survey are common in developed areas. During the 2018 survey completed by Klutz Biological Consulting, no sensitive plant or wildlife species were observed in the survey area (project site and 100-foot buffer), and the Biological Resource Letter Report determined that no sensitive plant species have a high potential to occur on the project site. Additionally, no sensitive or native vegetation communities that could support sensitive wildlife species were observed on the project site during the survey, and the Biological Resource Letter Report determined that the disturbed habitat on the project site is unlikely to support sensitive wildlife species. Further, properties surrounding the project site are developed with residential properties to the north, east and south, Jamacha Boulevard to the north, and La Presa Elementary School and church properties to the west. The proposed project would develop a commercial office structure, which would be compatible with surrounding land uses. Therefore, no sensitive plant or wildlife species are anticipated to be directly impacted by the proposed project.

However, project implementation has the potential to indirectly impact bird and raptor species that are protected under the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code, Section 3504. Although no birds nests were observed on site during the survey, the project site contains potential nesting habitat (eucalyptus and ornamental plantings) along the project boundary and on the ground within the non-native grassland habitat for bird species protected under the MBTA. This represents a potentially significant impact. Mitigation Measure BIO-1 would require a preconstruction nesting bird survey to ensure the project does not directly or indirectly impact MBTA protected bird species. Indirect impacts from construction noise and vibration during clearing, grubbing, and trenching activities, if conducted during the bird breeding season, could result in potentially significant indirect impacts to bird species protected under the MBTA. Removal of the potential nesting habitat within the non-native habitat on the project site would result in potentially significant impacts to sensitive birds and raptors; however, with implementation of Mitigation Measure BIO-1, direct and indirect impacts to bird species would be less than significant.

Indirect impacts to sensitive species would primarily result from adverse edge effects during construction of the project. Edge effects could include trampling; dust, which could disrupt plant vitality in the short term; construction-related pollutant discharges; soil erosion; and runoff. Standard best management practices (BMPs), including dust suppression measures, weeds and invasive species control measures, equipment maintenance and cleaning protocols, erosion and sediment control measures (e.g., sand and gravel bags, fiber rolls, and silt fencing), use of weed-free erosion control products, and preparation and implementation of a Storm Water Pollution Prevention Plan (SWPPP), would be required of the construction contractor. The SWPPP would be prepared pursuant to the National Pollutant Discharge Elimination System (NPDES) General Construction Permit (Water Quality Order 99-08-DWQ). The SWPPP would address the potential sources and locations of stormwater contamination characteristics, impacts of specific contaminants, and temporary and permanent erosion control practices and would include water sampling data, construction practices that minimize stormwater contamination, coordination of BMPs with planned construction activities, and compliance with County, state, and federal regulations. With the implementation of construction BMPs, temporary indirect impacts to potential sensitive species on the project site would be less than significant.

The GPU EIR determined significant and unavoidable impacts to candidate, sensitive, or special status species. As considered by the GPU EIR, project impacts to sensitive habitat and/or species would be mitigated through ordinance compliance and through implementation of breeding season avoidance. The GPU EIR identified this mitigation measure as Bio-1.7. As the proposed project would have a less than significant impact with mitigation for the reasons detailed above, the project would be consistent with the analysis in the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance other than the information identified in the GPU EIR.

BIO-1: General Nest Surveys

No grubbing, trimming, or clearing of vegetation from the project site shall occur during the general bird breeding season (January 15 through August 31). If grubbing, trimming, or clearing of vegetation cannot feasibly occur outside the general bird breeding season, a qualified biologist, as approved by the County of San Diego, shall perform a pre-construction nesting bird survey no more than 72 hours before the start of vegetation grubbing, trimming, or clearing to determine if active bird nests are present in the affected areas. If one or more active nests are found during the pre-construction survey, no construction activities should occur until the young have fledged and are no longer returning to the nest(s), as determined by the project biologist. If no active nests are present, construction activities may commence following concurrence by the USFWS and CDFW that the project will not directly or indirectly impact nesting migratory birds and/or raptors.

- 4(b) The GPU EIR concluded this impact to be significant and unavoidable. The project site is composed of non-native grassland and urban/developed land. Approximately 0.98-acre of non-native grassland occur within the project site and would be impacted by the proposed project. Impacts to non-native grasslands would be significant and would require mitigation. Mitigation measure BIO-2 would require compensatory

mitigation at a ratio of 0.5:1. Therefore, 0.49 acre of mitigation credits would be purchased within a County approved mitigation bank. Impacts to urban/developed lands would not be significant and would not require mitigation.

No native vegetation communities or habitats exist on or adjacent to the project site. The project site does not contain any riparian habitat or other sensitive natural communities. Further, no wetlands or sensitive lands as identified in the Resource Protection Ordinance (RPO) exist on-site. The project site is surrounded by urban/developed lands.

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

- 4(c) The GPU EIR concluded this impact to be significant and unavoidable. The project site does not contain any jurisdictional waters or 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 develop. Therefore, no impact on wetlands would occur.

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

- 4(d) The GPU EIR concluded this impact to be significant and unavoidable. According to the Biological Resource Letter Report (Appendix B), no regional wildlife corridors or regional linkages occur within the project site or adjacent to the project site. The project consists of non-native grasslands and urban development. Although the natural area surrounding Sweetwater Reservoir is about 0.15 mile south of the project site, the project site is immediately surrounded by urban development. Properties surrounding the project site are developed with residential properties to the north, east, and south, Jamacha Boulevard to the north, and La Presa Elementary School and church properties to the west. The proposed project would develop a commercial office structure, which would be compatible with surrounding land uses. The project site is unlikely to provide movement and suitable dispersal areas for wildlife species or significant connections to open space areas outside the project site. Nesting and foraging opportunities within the site are limited. The presence of the urban development surrounding the project site limits large-scale east–west and north–south wildlife movement in the surrounding area. Therefore, the project would not impact any regional wildlife corridors or linkages. Impacts would be less than significant.

The GPU EIR determined significant and unavoidable impacts from impacts to regional wildlife corridors and linkages. 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(e) The GPU EIR concluded this impact to be less than significant. Based upon the County Guidelines for Determining Significance – Biological Resources, a significant impact related to local policies, ordinances and adopted plans would occur if the project would:
- Impact coastal sage scrub vegetation within lands outside of the MSCP more than the County’s five-percent habitat loss threshold, or preclude connectivity between areas of high values, as defined by the Southern California Coastal Sage Scrub NCCP Guidelines.
 - Preclude or prevent the preparation of the subregional NCCP.

- Impact any amount of wetlands or sensitive habitat lands as outlined in the RPO.
- Not minimize and/or mitigate coastal sage scrub habitat loss in accordance with Section 4.3 of the NCCP Guidelines.
- Not conform with the goals and requirements, as outlined in any applicable Habitat Conservation Plan, Habitat Management Plan, Special Area Management Plan, Watershed Plan, or similar regional planning effort.
- Not minimize impacts to Biological Resources Core Areas (BRACs) within lands in the MSCP, as defined by the BMO.
- Not avoid impacts to MSCP narrow endemic species and would impact core populations of narrow endemics.
- Reduce the likelihood of survival and recovery of listed species in the wild.
- Result in the killing of migratory birds or destruction of active migratory bird nests and/or eggs (MBTA).
- Reduce functional foraging habitat for raptors.
- Result in the take of eagles, eagle eggs or any part of an eagle (Bald Eagle Protection Act).

The project site is located within the South County MSCP Plan Area in the Metro-Lakeside-Jamul segment but is located outside of a BRCA or the Pre-Approved Mitigation Area (PAMA). The project would not impact coastal sage scrub vegetation, wetlands, or sensitive habitat lands as identified in the RPO. The project would not impact the preparation of a subregional Conservation Plan (NCCP). Therefore, no impact is identified for this threshold. With implementation of Mitigation Measure BIO-1, the proposed project would not result in significant adverse impacts to migratory birds or their nests or eggs. The current project site provides minimal foraging habitat, as it is surrounded by developed land uses. Therefore, 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.

The GPU EIR concluded this impact 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

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. Mitigation measures contained within the GPU EIR to protect migratory birds and their nests (Bio-1.7) would be applied to the project.

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

Discussion

5(a) The GPU EIR concluded this impact to be less than significant with mitigation. Based on an analysis of County records, the South Coastal Information Center records, and the County’s GIS system by Senior Adjunct Archaeologist, Donna Beddow, it has been determined that there are no impacts to historical resources because they do not occur within 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 an analysis of County records, the South Coastal Information Center records, and the County’s GIS system by Senior Adjunct Archaeologist, Donna Beddow, it has been determined that there are no impacts to archaeological resources because they do not occur within the project site. The project is an infill development that has been previously graded historically. Excavation of the project site is minor at 850 cubic yards of excavation and fill of 3,600 cubic yards.

The Native American Heritage Commission (NAHC) was contacted for a Sacred Lands check. The NAHC response was received indicating no sacred sites on record with the commission were present on the project property. The following Native American Tribes were contacted for any information they may have regarding Sacred Sites that may be present on-site Barona Group of the Capitan Grande, Campo Kumeyaay Nation, Iipay Nation of Santa Ysabel, Jamul Indian Village, Kwaaymii Band of Mission Indians, Manzanita Band of the Kumeyaay Nation, San Pasqual Band of Mission Indians, Sycuan Band of the Kumeyaay Nation, and Viejas Band of Kumeyaay Indians. No comments were received during the Tribal Notification period.

As considered by the GPU EIR, potential impacts to cultural resources would be mitigated through ordinance compliance and through compliance with the County’s Guidelines for Significance – Cultural Resources if resources are encountered. The GPU EIR identified these mitigation measures as Cul-2.5.

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 GPU EIR concluded this impact to be less than significant. Unique geologic features are not common in San Diego County, and 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 potentially contain unique paleontological resources. Proposed grading would include less than 2,500 cubic yards of excavation which has the potential to impact fossil deposits.

Accordingly, grading monitoring under the supervision of the project contractor would be a condition of project approval.

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-3.1 as described in the GPU EIR for the reasons detailed above. Therefore, with implementation of Cul-3.1, 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.

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 within the GPU EIR (Cul-2.5 and Cul-3.1) would be applied to the project.

Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
---	---	--

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 within the GPU EIR as a separate issue area under CEQA. At the time, Energy Use was contained within Appendix F of the CEQA Guidelines and since then has been moved to the issue areas within Appendix G of the CEQA Guidelines. However, the issue of energy use in general was discussed within the GPU and the GPU EIR. For example, within the Conservation and Open Space Element of the GPU, Goal COS-15 promotes sustainable architecture and building techniques that reduce emissions of criteria pollutants and greenhouse 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 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 occupants, and the operation of delivery vehicles to service the new office building.

Grading and Construction

Project grading includes 650 cubic yards of excavation, 3,600 cubic yards of fill, and 2,950 cubic yards of import. 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. 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 commercial projects of this size in a suburban setting. Additionally, the project is consistent with the General Plan and Zoning Ordinance. As such, the project’s energy consumption during the grading and construction phase would not be considered wasteful, inefficient, or unnecessary.

Operational

Operation of the project would be typical of commercial office 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 projects would be designed as all-electric structures, with no natural gas appliances or plumbing. 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 Program, CAFE 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 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 all-electric structure, with no natural gas appliances or natural gas plumbing.
 - 33% Renewable Portfolio Standard implemented.
 - Recycling and composting services to reduce solid waste generation and handling by 20%.
 - Planting 39 new trees on site.

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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in an on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion

7(a)(i) The GPU EIR concluded this impact to be less than significant. The project is not located in a fault rupture hazard zone identified by the Alquist-Priolo Earthquake Fault Zoning Act, Special Publication 42, Revised 1997, Fault Rupture Hazards Zones in California, or located on any known active, potentially active, or inactive fault traces. The nearest active fault is the La Nacion Fault Zone located approximately 3 miles west of the site.

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

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

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

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

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

- 7(a)(iv) The GPU EIR concluded this impact to be less than significant. The project is not located in a Landslide Susceptibility Area classified as “generally susceptible” as identified in the County Guidelines for Determining Significance for Geologic Hazards. No ancient landslides or evidence of past slope instability have been mapped on the project site. Landslide Susceptibility Areas were developed based on landslide risk profiles included in the Multi-Jurisdictional Hazard Mitigation Plan, San Diego, CA (URS 2004). Landslide risk areas from this plan were based on data including steep slopes (greater than 25 percent), soil series data (SANDAG based on USGS 1970s series), soil-slip susceptibility from USGS, and Landslide Hazard Zone Maps (limited to western portion of the County) developed by the California Department of Conservation Division of Mines and Geology (DMG).

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 identified 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 soils on-site are identified as Huerhuero-Urban land complex, 9 to 30 percent slopes (HuE). 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 and Grading Ordinance. Compliance with these ordinances would ensure that the project would not result in any unprotected erodible soils, would not substantially alter existing drainage patterns, and would not develop on steep slopes. Additionally, the project would be required to implement BMPs per the Standard Development Project Storm Water Quality Management Plan (SWQMP) to prevent fugitive sediment. 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 EIR.

- 7(c) The GPU EIR concluded this impact to be less than significant. As indicated in response (a)(iv), the site is not located in a Landslide Susceptibility Area, as identified in the County Guidelines for Determining Significance for Geologic Hazards. Furthermore, the site is not within a Potential Liquefaction Area. As such, the on-site geological formations are not expected to be unstable or become unstable as a result of the project.

To assure that any proposed buildings are adequately supported, a Soils Engineering Report 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 underlain by loam and clay soils (i.e., Huerhuero-Urban land complex, 9 to 30 percent slopes), which can be expansive. However, the project would not result in a significant impact because compliance with the Building Code, preparation of a Soils Engineering Report, and implementation of standard engineering techniques would ensure structural safety.

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

- 7(e) The GPU EIR concluded this impact to be less than significant. The project would rely on the existing sewer lines that serve surrounding residential, commercial, and institutional 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion

A Greenhouse Gas Assessment was prepared for the project by SRA on October 17, 2024 (Appendix C).

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

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

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

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

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

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.

Since this analysis was prepared prior to the adoption of the County's 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 current CEQA threshold provided by the Bay Area Air Quality Management District (BAAQMD) was used to evaluate GHG emissions as it is considered a "fair share" approach to achieve long-term climate goals and is consistent with California Supreme Court outcome opinions garnered from *Center for Biological Diversity v. Department of Fish & Wildlife* (2015) (62 Cal.4th 204).

For land use development projects, the BAAQMD recommends using 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. 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 would be required to achieve those long-term climate goals, then a reviewing agency can find that the impact would not be significant because the project would help to solve the problem of global climate change (62 Cal.4th 220–223). If a land use project incorporates all of the design elements necessary for it to be carbon neutral by 2045, then it would contribute its portion of what is needed to achieve the state's climate goals and would help to solve the cumulative problem. It can therefore be found to make a less than cumulatively considerable climate impact. Because this guidance supports how a project would contribute its "fair share" of the statewide long-term GHG reduction goals, it is not specific to the BAAQMD region and can also be applied in the San Diego region. BAAQMD's Justification Report: CEQA Thresholds for Evaluating the Significance of Climate Impacts from Land Use Projects and Plan (Justification Report), adopted April 2022, is provided in Appendix H. The information provided in the Justification Report is intended to provide the substantial evidence that lead agencies need to support their determinations about significance using these thresholds.

The Justification Report analyzes what would be required of new land use development projects to achieve California's long-term climate goal of carbon neutrality by 2045. A new land use development project being built today needs to incorporate the following design elements to do its "fair share" of implementing the goal of carbon neutrality by 2045:

- A) Projects must include, at a minimum, the following project design elements:
 - 1) Buildings
 - a) The project will not include natural gas appliances or natural gas plumbing (in both residential and nonresidential development).
 - b) The project will not result in any wasteful, inefficient, or unnecessary energy usage as determined by the analysis required under CEQA Section 21100(b)(3) and Section 15126.2(b) of the CEQA Guidelines.
 - 2) Transportation
 - a) Achieve a reduction in project-generated VMT below the regional average consistent with the current version of the California Climate Change Scoping Plan (currently 15 percent) or meet a locally adopted SB 743 VMT target, reflecting the recommendations provided in the Governor's Office of Planning and Research's (OPR) Technical Advisory on Evaluating Transportation Impacts in CEQA:
 - (i) Residential projects: 15 percent below the existing VMT per capita.
 - (ii) Office projects: 15 percent below the existing VMT per employee.
 - (iii) Retail projects: no net increase in existing VMT.
 - b) Achieve compliance with off-street EV requirements in the most recently adopted version of CALGreen Tier 2.

Building Energy Use

The project site is currently in a disturbed state with minor amounts of scrub vegetation. This analysis assumes that the existing emission levels are zero and takes into account the loss in carbon sequestration from development of the existing site, although the existing site scrub vegetation has a minor amount of carbon sequestration potential.

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. For the building sector to achieve carbon neutrality, natural gas usage will need to be phased out and replaced with electricity usage, and electrical generation will need to shift to 100 percent carbon-free sources. To support these shifts, new projects need to be built without natural gas and with no inefficient or wasteful energy usage.

The project would result in GHG emissions from energy used in the proposed 12,000-sf office building. The approval of the project would be conditioned with the requirement that the office building will be required to be constructed as all-electric, with no natural gas appliances or natural gas plumbing.

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. At a minimum, the project would meet the energy efficiency requirements of Title 24. The project will include low-flow fixtures in faucets, toilets, and showers. GHG emissions associated with electricity use would be eliminated as California decarbonizes the electrical generation infrastructure as committed to by 2045 through SB 100, the 100 percent Clean Energy Act of 2018. Therefore, the project would contribute its "fair share" of what is required to achieve carbon neutrality of buildings by 2045.

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. The Justification Report states that "motor vehicle transportation does not need to be eliminated entirely for the land use sector to achieve carbon neutrality, as carbon-free vehicle technology can be used (e.g., EVs powered by carbon-free electricity sources). 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 12,000-sf commercial office building. The anticipated traffic to be generated by the project was determined using SANDAG's *Brief Guide of Vehicular Traffic Generation Rates for the San Diego Region*. Per this guide, the project is estimated to generate 240 Average Daily Trips (Appendix E). 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. Therefore, the project would not require further VMT analysis and would not result in a significant direct or cumulative VMT impact. Therefore, 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.

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 (refer to Section 11, Land Use and Planning), and the project's less than significant impact related to VMT (refer to 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.

The project site's General Plan designation is Office Professional, and the zoning for the site is C30 - Commercial. Because the project is consistent with the General Plan, it will not conflict with this plan or increase GHG emissions beyond what would have been assumed within GHG inventories estimated by the General Plan. The project includes design features to reduce GHG impacts to less than significant.

The project would not conflict with the SANDAG Regional Transportation Plan and Sustainable Communities Strategy. The project is proposing an infill office building. According to the traffic analysis, the project's average VMT per employee is at least 15% below the County's Unincorporated Average VMT per employee and would result in less than significant impacts on VMT (Appendix C).

Therefore, the project would not conflict with the RTP/SCS goals of reducing GHG emissions. The proposed Project, therefore, would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

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

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

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

9. Hazards and Hazardous Materials – Would the project:

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

Discussion

9(a) The GPU EIR concluded this impact to be less than significant. 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 Consolidated Fire Protection District.

Operation of the proposed development would include the storage and use of household hazardous materials and wastes associated with commercial office buildings. Typical household hazardous materials associated with the commercial 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 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 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, La Presa Elementary School, is adjacent to the southwest corner 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 not within an Airport Land Use Compatibility Plan (ALUCP). Gillespie Field is located approximately 8.2 miles north of the project site. Furthermore, the project does not propose the construction of any structure equal to or greater than 150 feet in height that would constitute a safety hazard to aircraft and/or operations from an airport or heliport.
significant.

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

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

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

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

The project would not interfere with this plan because it would not prohibit subsequent plans from being established or prevent the goals and objectives of existing plans from being carried out. Therefore, no new impacts would occur.

- 9(f)(ii) **SAN DIEGO COUNTY NUCLEAR POWER STATION EMERGENCY RESPONSE PLAN:** The project site is not within the San Onofre emergency planning zone. Therefore, no new impacts would occur.

- 9(f)(iii) **OIL SPILL CONTINGENCY ELEMENT:**

The project is not located along the coastal zone. Therefore, no new impacts would occur.

- 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. Therefore, no new impacts would occur.

- 9(f)(v) **DAM EVACUATION PLAN:**

The project site is located approximately 1.45 miles northwest of Sweetwater Main Dam, which is in an Extremely High hazard area for dam inundation; however, 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 southern portion of the project site is identified as a Very High Fire Hazard Severity Zone (FHSZ) by the California Department of Forestry and Fire (CAL FIRE). However, the project site is in an urban area and is surrounded by residential, commercial, and industrial land uses. The project would not expose people or structures to a significant risk of loss, injury or death involving wildland fires because the project would comply with the regulations relating to emergency access, water supply, and defensible space specified in the Consolidated Fire Code for the 16 Fire Protection Districts in San Diego County, including:

- All exterior walls would be 1-hour rated firewalls.
- All buildings would be fully sprinklered.
- Well-developed fuel treatments would be required throughout the entire site.
- All driveways will have a fire apparatus turnaround built to reduce fire apparatus backing incidents.

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

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

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

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

Conclusion

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

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

Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
---	---	--

10. Hydrology and Water Quality – Would the project:

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

- l) Expose people or structures to a significant risk of loss, injury or death involving flooding as a result of the failure of a levee or dam?
- m) Inundation by seiche, tsunami, or mudflow?

Discussion

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

- Storm Water Quality Management Plan (SWQMP) prepared by the County of San Diego, dated March 6, 2023 (Appendix D).
- CEQA Drainage/Hydrology Study prepared by Bajoua Engineering, dated September 19, 2022 (Appendix E).
- Storm Water Intake Form prepared by the County of San Diego, dated April 20, 2022 (Appendix F)

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 require implementation of typical erosion control BMPs. 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 on September 2, 2009. As noted in the SWQMP prepared for the project (Appendix D), construction BMPs would include vegetation stabilization planting and hydraulic stabilization hydroseeding in the summer; bonded fiber matrix or stabilized fiber matrix in the winter; mulch, straw, wood chips, and soil application for erosion control on flat areas; energy dissipator outlet protection; silt fencing, fiber rolls, gravel and sand bags, and storm drain inlet protection for sediment control; a stabilized construction entrance and street sweeping and vacuuming to prevent offsite sediment tracking; and materials and waste management (Appendix D).

During the post-construction phase, as outlined in the SWQMP, the project would implement site design, source control and structural BMPs to prevent potential pollutants from entering stormwater runoff, such as conserving some natural areas, soils, and vegetation onsite; dispersing impervious areas; using permeable materials for the sidewalks, parking lot, and driveways; dispersing rooftop runoff; using water efficient landscaping; installation efficient irrigation systems; and minimizing erosion of slopes and surfaces (Appendix D).

The SWQMP has been prepared in accordance with the County of San Diego BMP Design Manual (2019), which is a design manual for compliance with local County of San Diego Watershed Protection Ordinance (Sections 67.801 et seq.), and San Diego Region Order No. R9-2013-0001 Municipal Separate Storm Sewer System (MS4) Permit (2013) requirements for stormwater management, as adopted by the Regional Water Quality Control Board (RWQCB) on May 8, 2013. The project’s conformance to the waste discharge requirements of both the CGP and MS4 stormwater permits 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. However, the project would have a less than significant impact to waste discharge requirements with the implementation of project BMPs, consistent with GPU EIR mitigation measures (Hyd-1.2 through Hyd-1.5). 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 Jamacha hydrologic subarea (909.21) of the Sweetwater hydrologic unit (909). The project is less than 0.5 mile north of Sweetwater Reservoir, which is considered an impaired water body, as listed on the Clean Water Act Section 303(d) list. Sweetwater Reservoir is listed for the following pollutants: mercury and dissolved oxygen (State Water Resources Control Board 2022). As the project is not a tributary, the project impacts regarding an increase in any listed pollutant would be limited to runoff related impacts.

The project is located within Sweetwater Watershed. Under Section 303(d) of the Clean Water Act, the Sweetwater Watershed was identified as impaired for a number of pollutants, including fecal bacteria, metals/metalloids, nutrients, salinity, toxicity, pesticides, and sediment. The project could contribute to release of these pollutants; however, the project would comply with the Watershed Protection Ordinance and implement site design measures, source control BMPs, and structural BMPs to prevent a significant increase of pollutants to receiving waters during project construction and operation as described in Section 10(a). Implementation of construction and operational BMPs for water quality would ensure less than significant impacts related to an increase in pollutants for which the water body is impaired.

As previously discussed, the GPU EIR determined significant and unavoidable impacts to water quality standards and requirements. However, the project would have a less than significant impact to water quality standards and requirements with implementation of the BMPs described in Appendix D, 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(c) The GPU EIR concluded this impact to be significant and unavoidable. As stated in Sections 10(a) and 10(b), implementation of BMPs outlined in the SWQMP (Appendix D) and compliance with required ordinances would ensure that project impacts to water quality are less than significant. 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 Otay Water District, which obtains water from purchasing treated and desalinated water from the San Diego County Water Authority and treated water from the Helix Water District. The project would not use groundwater for its potable water supply. In addition, the project is located in a developed area. The project would increase impervious area on site by approximately 9,947 square feet, which would negligibly reduce regional groundwater recharge. The project would include landscaped areas and permeable surfaces along the sidewalks, parking lot, and driveway. Therefore, the project would not interfere substantially with groundwater recharge

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

- 10(e) The GPU EIR concluded this impact to be less than significant with mitigation. The project would not result in substantial erosion or siltation on- or off-site due to project design and implementation of construction and operational BMPs.

The project consists of the construction of a new commercial office structure which includes a graded pad, commercial structure, paved parking lot, landscaping, and a new trash enclosure. The existing project site is sloped toward Jamacha Boulevard; therefore, stormwater runoff currently travels as sheet

flow through the vacant lot to the north/northeast toward Jamacha Boulevard. Under proposed project conditions, the sidewalks, parking lot, and driveway would be paved with permeable pavement, and landscaping along the eastern portion of the property would allow for stormwater drainage. Runoff from the roof of the proposed building is designed to flow via downspouts and discharge to permeable pavement and towards the catch basin at the southeast corner of the parking lot. From there, the discharge would drain via 8-inch PVC pipe to a second catch basin, which would be tied to the existing curb outlet along Jamacha Boulevard. Storm water discharge from the northern landscaped portion along Jamacha Boulevard would drain to two sidewalk underdrain pipes (Appendix E). Therefore, with implementation of the proposed landscaping, permeable pavement, and catch basins, the project would not result in substantial erosion or siltation on- or off-site.

Further, the SWPPP and SWQMP (Appendix D) specify and describe the implementation process of all construction and operational 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.

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, Hyd-3.1 through Hyd-3.3, Hyd-6.1, and Hyd-8.2). Therefore, the project would be consistent with the analysis in the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance other than the information identified in the GPU EIR.

- 10(f) The GPU EIR concluded this impact to be less than significant with mitigation. According to the CEQA Drainage/Hydrology Study (Appendix E), the project would result in a decrease in the stormwater discharge on Jamacha Boulevard due to pervious concrete pavement, landscaped areas, and the proposed catch basins. Therefore, 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) According to the CEQA Drainage/Hydrology Study (Appendix E), the difference in stormwater discharge following implementation of the project is -0.28 cubic feet per second, which is a decrease in the stormwater discharge on Jamacha Boulevard as compared to existing conditions. The project would result in a decrease in the stormwater discharge on Jamacha Boulevard due to pervious concrete pavement, landscaped areas, and the proposed catch basins. Therefore, the project would not contribute runoff water that would exceed the capacity of the existing stormwater drainage system.

As previously discussed, the GPU EIR determined impacts to exceed capacity of stormwater systems 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. Additionally, the project does not include any habitable structures. Therefore, the project would not place housing within a County or federal floodplain or flood way.

As previously discussed, the GPU EIR determined impacts from housing within a 100-year flood hazard area as less than significant with mitigation. 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 structures within a flood hazard area which would impede or redirect flood flows.

As previously discussed, the GPU EIR determined impacts from housing within a 100-year flood hazard area 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 project site is located approximately 1.45 miles northeast of Sweetwater Main Dam, which is in an Extremely High hazard area for dam inundation; however, the project site is not within a Dam Inundation Zone (California Department of Water Resources 2024). 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) The GPU EIR concluded this impact to be less than significant with mitigation.

(i) SEICHE: The project site is approximately 0.32 mile from the shoreline of Sweetwater Reservoir. However, according to the County of San Diego Guidelines for Determining Significance Hydrology and Water Quality, land within the County is unlikely to experience inundation due to a seiche (County of San Diego 2021). Therefore, no new impacts would occur.

(ii) TSUNAMI: According to the County of San Diego Guidelines for Determining Significance Hydrology and Water Quality, land within the county is unlikely to experience inundation due to a tsunami (County of San Diego 2021). Further, the project site is not located in a tsunami hazard zone (California Department of Conservation 2024). Therefore, no new impacts would occur.

(iii) MUDFLOW: Mudflow is type of landslide. See Section 7(a)(iv).

As previously discussed, the GPU EIR determined impacts from seiche, tsunami, and mudflow hazards to be less than significant with mitigation. However, the proposed project would have a less than significant impact for the reasons detailed above, the project would be consistent with the analysis 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 regards to the issue area of Hydrology and Water Quality, the following findings can be made:

1. No peculiar impacts to the project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. Feasible mitigation measures contained within the GPU EIR (Hyd-1.2 through Hyd-1.5, Hyd-3.1 through Hyd-3.3, Hyd-6.1, and Hyd-8.2) would be applied to the project. The mitigation measures, as detailed above, require 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Discussion

- 11(a) The GPU EIR concluded this impact as less than significant. The project does not include the introduction of new infrastructure such as major roadways, water supply systems, or utilities to the area. The project is a 12,000-sf office building and parking lot on two parcels zoned for Commercial and Office uses. The project is consistent with the County Zoning Ordinance Land Use Regulation and density established under the County General Plan. Therefore, the project does not propose any development which would be expected to divide the surrounding established community.

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

- 11(b) The GPU EIR concluded this impact to be less than significant. The project is a development consisting of a 12,000-sf office building and parking lot on a 1.08-acre site. The commercial use type and density are consistent with the Office Professional (C30) land use designation and with the County Zoning Ordinance. The project would not conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect, including policies of the General Plan and Community Plan.

As previously discussed, the GPU EIR determined impacts to conflicts with land use plans, policies, 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Discussion

12(a) The GPU EIR determined that impacts to mineral resources would be significant and unavoidable. The California Surface Mining and Reclamation Act required classification of land into Mineral Resource Zones (MRZs). The project site has been classified by the California Department of Conservation – DMG (Update of Mineral Land Classification: Aggregate Materials in the Western San Diego Production-Consumption Region, 1997) as being within an area of Potential Mineral Resource Significance (MRZ-3). However, the project site has no alluvium or mines and is surrounded by residential, commercial, and institutional (e.g., churches, schools) development. Therefore, implementation of the project would not result in the loss of availability of a known mineral resource that would be of value since the mineral resource has already been lost due to incompatible land uses.

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

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

Conclusion

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

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

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

Discussion

A Focused Noise Analysis was prepared for the project by Eilar Associates, Inc., dated December 18, 2018 and revised October 15, 2024 (Appendix G). The following responses have incorporated the analysis from the report.

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. Both construction and operational noise impacts associated with the project are expected to comply with noise limits set within the County of San Diego Noise Ordinance at surrounding property lines during daytime and nighttime hours.

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 2011b). For the project site’s zoning designation (Commercial and Office), 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. Section 36.409 of the County of San Diego Noise Ordinance states it is unlawful to operate construction equipment that exceeds an average sound level of 75 dB for an eight-hour period between 7 a.m. and 7 p.m. when measured at the boundary line of the property where the noise source is located or on any occupied property where the noise is being received.

Temporary construction noise was calculated in the Focused Noise Analysis to determine the impact construction noise will have on surrounding occupied properties (Appendix G). As activity on the southeast portion of the project site would represent the worst-case condition where construction equipment would be operating at the closest distance to surrounding noise-sensitive properties, this area has been used for a worst-case analysis of construction noise at the site. According to the noise modeling, the worst-case eight-hour average noise level would be 72.7 dBA during grading activities. Therefore, the noise modeling results show that the worst-case noise levels from proposed construction activities would not exceed the County of San Diego temporary construction noise limit of 75 dBA at worst-case adjacent property lines during the construction activity. Nevertheless, the Focused Noise Analysis identifies general good practice measures that should be followed whenever possible to ensure that noise levels remain below the County of San Diego construction noise limits, including the following:

1. Turn off equipment when not in use.
2. Equipment used in construction should be maintained in proper operating condition, and all loads should be properly secured, to prevent rattling and banging.
3. Use equipment with effective mufflers.
4. Minimize the use of backup alarms.
5. Equipment staging areas should be placed at locations away from noise-sensitive (occupied) receivers.
6. Equipment operation must be limited to the allowable hours of operation set by the County of San Diego.

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 whether noise from operation would exceed the noise standards of the County of San Diego Noise Ordinance. Anticipated operational noise impacts from the proposed project would primarily consist of air conditioning units that would serve commercial offices on-site. The HVAC units that would be used on site are currently unknown, and for purposes of the Focused Noise Analysis, were assumed to be manufactured by Carrier. A total of four 6-ton units were modeled

and were assumed to be roof-mounted. Noise levels of mechanical equipment operation were calculated at surrounding receivers considering existing and proposed site topography and the proposed building structure. Noise impacts were compared to the more restrictive nighttime noise limits, for a worst-case analysis.

With typical equipment in place, noise impacts from mechanical equipment are expected to comply with the noise limits set within the County of San Diego Noise Ordinance at surrounding property lines during daytime and nighttime hours without additional mitigation (Appendix G). In the event that significantly louder equipment or different equipment locations are chosen, the exact equipment type and placement can be evaluated prior to the issuance of building permits in order to reevaluate the noise impacts and potential need for mitigation.

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. 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 50 feet to the south. Construction equipment associated with the project would have the potential to result in groundborne vibration above the Federal Transit Administration threshold of 0.014 inch per second 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. 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 office building 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 and would be consistent with the analysis in the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance other than the information identified in the GPU EIR.

- 13(c) The GPU EIR determined impacts from permanent increase in ambient noise levels to be significant and unavoidable. As indicated in the response listed under Section 13(a), the project would not expose existing 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. Additionally, operational noise from the proposed office building, HVAC systems, and parking lot would be less than significant. 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. 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. Additionally, as described in Section 13(a), operational noise from the proposed office building, HVAC systems, and parking lot would be less than significant.

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 project site is not within the boundaries of an Airport Land Use Plan and is not within 2 miles of a public use airport or private airstrip. The nearest airport is Gillespie Field, located approximately 8.2 miles to the north. The project site is outside the noise contour for Gillespie Field. As such, the project would not expose residents to excessive noise levels and no impacts would occur. Therefore, the project would be consistent with the analysis in the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance other than the information identified in the GPU EIR.
- 13(f) The GPU EIR concluded this impact to be less than significant with mitigation. The project is not located within a 1-mile vicinity of a private airstrip. Therefore, the project would be consistent with the analysis in the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance other than the information identified in the GPU EIR.

Conclusion

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

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

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

Discussion

14(a) The GPU EIR concluded this impact to be less than significant. The General Plan Land Use and Zoning Designations for the project site are Office Professional (C30). The project is consistent with density and lot size requirements of the General Plan and Zoning Ordinance. The project is consistent with the density allowable under the General Plan, and thus would not induce substantial unplanned population growth in the area as development of the site was accounted for within the GPU. In addition, the project does not propose any physical or regulatory change that would remove a restriction to or encourage population growth in the area.

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

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

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

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

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

Conclusion

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

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

Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
---	---	--

15. Public Services – Would the project:

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

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

Discussion

15(a) The GPU EIR concluded this impact to be less than significant with mitigation for the exception of school services, which remained significant and unavoidable. The project would develop a 1.08-acre property with a 12,000-sf office building and associated parking lot. The project does not involve the construction of new or physically altered governmental facilities including but not limited to fire protection facilities, sheriff facilities, schools, or parks 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 Consolidated Fire Protection District. The nearest fire station is the Station 16, located at 905 Gillespie Drive, Spring Valley, California 91977, approximately 1.1 miles (driving) west of the project site. The project does not include residential units and would not generate substantial demand for public services resulting in the need for new or physically altered facilities, the construction of which could cause significant environmental impacts. Similarly, the project would not include any residential or business uses that would increase population growth, generate an increased demand for school or park facilities, or require the construction of school or park facilities. 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 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b) Does the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Discussion

16(a) The GPU EIR concluded this impact to be less than significant with mitigation. The project includes a 12,000-sf office building and would not generate population growth that would result in increased use of existing parks and other recreational facilities.

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

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

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

Conclusion

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

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

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? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| e) Result in inadequate emergency access? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Discussion

A Traffic Impact Study was prepared for the project by LOS Engineering, Inc., dated November 7, 2018 (Appendix H).

17(a) The GPU EIR concluded this impact to be significant and unavoidable. The Traffic Impact Study identified that the proposed project would generate 240 new daily trips. However, the project would not create a conflict with any performance measures because with the addition of project trips, the circulation system does not degrade to below standards established in the County’s TSG. The project would not result in a substantial increase in the number of vehicle trips, volume of capacity ratio on roads, or congestion at intersections in relation to existing conditions.

In addition, the project would not conflict with policies related to non-motorized travel such as mass transit, pedestrian, or bicycle facilities. Two Metropolitan Transit System (MTS) bus stops are located within walking distance to the project site. These stops are served by MTS Route 856 which runs from the San Diego State University College Area along College Avenue, Broadway, Sweetwater Road, and Jamacha Boulevard along the project frontage.

Weekday service begins at 4:30 AM with 30-minute headways throughout the day and ends at 11:05 PM. Saturday service begins at 5:27 AM with 1-hour headways throughout the day and ends at 10:05 PM. Sunday service begins at 6:26 AM with 1-hour headways throughout the day and ends at 7:16 PM. The project would take advantage of its proximity to these bus stops, and would not result in a conflict with transit, pedestrian, or bicycle facilities. Therefore, the project would not conflict with any policies establishing measures of the effectiveness for the performance of the circulation system.

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

- 17(b) The GPU EIR concluded this impact to be significant and unavoidable. 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 primary metric for evaluating transportation impacts under CEQA in accordance with SB 743, which eliminates the use of auto delay, LOS, and other similar measures of vehicular capacity or traffic congestion as a basis for determining significant transportation impacts under CEQA. VMT measures the number of vehicle trips generated and the length or distance of those trips.

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. For instance, 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 criteria were developed based on the OPR Technical Advisory on Evaluating Transportation Impacts in CEQA and are meant to quickly identify when a project should be expected to cause a less than significant impact without conducting a detailed study.

The proposed project is a 12,000-sf office building. The anticipated traffic to be generated by the project was determined using SANDAG's *(Not So) Brief Guide of Vehicular Traffic Generation Rates* for the San Diego Region. Per this guide, the project is estimated to produce 240 average daily trips. However, per the County of San Diego TSG, the project may be screened out of a VMT analysis using the Map-Based Screening for Employment Project criteria. Under this criterion, employment 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 an employment project is an area with an average VMT per employee 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 Employment Projects, 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 for employment areas. 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. 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.

The proposed project 240 daily trips are anticipated to be distributed on mobility element roadways in the County that were analyzed by the TIF program, some of which currently are projected to operate at inadequate levels of service. These project trips therefore contribute to a potential significant cumulative impact and mitigation is required. The County of San Diego's TIF program is an overall programmatic

solution that addresses existing and projected future road deficiencies in the unincorporated portion of San Diego County. This program funds improvements to roadways necessary to mitigate potential cumulative impacts caused by traffic from future development. Because the proposed project is located within the Spring Valley TIF area, the project applicant would be required to pay into the TIF program to mitigate any potential cumulative impacts. The potential growth represented by the proposed project was included in the growth projections upon which the TIF project is based. The TIF cost is based on the year when building permits are pulled and type of building permit.

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

- 17(c) The GPU EIR concluded this impact to be less than significant with mitigation. The project site is not within an ALUCP. As discussed in Section 9(d), Gillespie Field is approximately 8.2 miles north of the project site. Furthermore, the project does not propose the construction of any structure equal to or greater than 150 feet in height that would constitute a safety hazard to aircraft and/or operations from an airport or heliport. Therefore, the project would be consistent with the analysis in the GPU EIR because it would not increase impacts identified in the GPU EIR.

- 17(d) The GPU EIR concluded this impact to be significant and unavoidable. The project would not substantially alter traffic patterns, roadway design, place incompatible uses (e.g., farm equipment) on existing roadways, or create curves, slopes or walls which would impede adequate sight distance on a road. The private driveways from Jamacha Drive 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 the proposed driveway on Jamacha Boulevard across from and in alignment with San Juhn Street 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 Jamacha Boulevard 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. Additionally, the MTS Bus Route 856 travels Jamacha Boulevard along the project frontage with two stops within walking distance to the project site. The project does not include any improvements which would inhibit the future performance of public transit 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

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

1. No peculiar impacts to the project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. Feasible mitigation measures contained within the GPU EIR (Tra-4.2) would be applied to 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| e) Result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project’s projected demand in addition to the provider’s existing commitments? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| f) Be served by a landfill with sufficient permitted capacity to accommodate the project’s solid waste disposal needs? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| g) Comply with federal, state, and local statutes and regulations related to solid waste? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Discussion

- 18(a) The GPU EIR concluded this impact to be less than significant with mitigation. Sewer service would be provided by Spring Valley Sanitation District from an existing sewer line on Jamacha Boulevard. A service availability letter from Spring Valley Sanitation District dated 11/7/2024 indicated that it has sufficient capacity to serve the project (Appendix A). Further, the project is consistent with the land use designation and zoning for the site and was therefore adequately anticipated in the GPU EIR and Spring Valley Sanitation District Sewer Master Plan. Therefore, the project would not exceed 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. Water service would be provided by Otay Water District from an existing water line on Jamacha Boulevard. According to the water service availability letter dated 11/20/2024, adequate water resources and entitlements are available to serve the project (Appendix A). In addition, as described in Section 18(a), the Spring Valley Sanitation District provided a service availability letter indicating that it has sufficient capacity to serve the project (Appendix A). Therefore, the project would not require the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.

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

- 18(c) The GPU EIR concluded this impact to be less than significant with mitigation. As described in Section 10, the project involves new stormwater drainage facilities, including two catch basins on site. However, these facilities would not result in additional adverse physical effects beyond those already identified in other sections of this environmental analysis.

As previously discussed, the GPU EIR determined impacts on sufficient stormwater drainage facilities to be less than significant. As the project would have a less than significant impact for the reasons detailed above, the project would be consistent with the analysis 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 Otay Water District, which has adequate water to serve the project according to the water service availability form dated 11/20/2024 (Appendix A). 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 Spring Valley Sanitation District, which has sufficient capacity to serve the project according to a service availability letter dated 11/7/2-024 (Appendix A). Therefore, the project would not interfere with any wastewater treatment provider's service capacity. As the project would have a less than significant impact for the reasons detailed above, the project would be consistent with the analysis in the GPU EIR because

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

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

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

Conclusion

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

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

Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
---	---	--

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

- | | | | |
|--|--------------------------|--------------------------|--------------------------|
| a) Substantially impair an adopted emergency response plan or emergency evacuation plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts in the environment? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| d) Expose people or structures to significant risk, including downslopes or downstream flooding or landslides, as a result of runoff, post-fire instability, or drainage changes? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Discussion

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

- 19(a) The GPU EIR concluded this impact to be significant and unavoidable. The southern portion of the project site is identified as a Very High FHSZ by CAL FIRE. However, the project site is in an urban area and is surrounded by residential, commercial, and industrial land uses. Fire and emergency protection would be provided by the San Miguel Consolidated Fire Protection District. The nearest fire station is the Station 16, located at 905 Gillespie Drive Spring Valley, CA 91977, approximately 1.1 miles (driving) west of the project site. A service availability letter from the San Miguel Consolidated Fire Protection District (Appendix A) indicated that the station has sufficient capacity to serve the project. Therefore, the project would not substantially impair an adopted emergency response plan or emergency evacuation plan, and no new impacts would occur.

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

- 19(b) The GPU EIR concluded this impact to be significant and unavoidable. The southern portion of the project site is identified as a Very High FHSZ by CAL FIRE. However, the project site is located in an urban area and is surrounded by residential, commercial, and industrial land uses. 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. Additionally, the project site would be relatively flat following project construction.

Implementation of fire safety standards would occur during the Building Permit process and is consistent with GPU EIR Mitigation Measure Haz-4.3. In addition, the project is consistent with the Zoning Ordinance and the density established under the County General Plan. Therefore, for the reasons stated above, the project would not 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 a new driveway. The project also requires utility connections for service from the Otay Water District and Spring Valley 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 regards to the issue area of Wildfire, the following findings can be made:

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

Appendix A

Air Quality & Greenhouse Gases

Air Quality Assessment Jamacha Boulevard Office Building, Spring Valley, CA, Scientific Resources
Associated (SRA), October 17, 2024

Greenhouse Gas Assessment Jamacha Boulevard Office Building, Spring Valley, CA, Scientific Resources
Associated (SRA), October 17, 2024

Biological Resources

Biological Resource Letter Report for the Jamacha Building in Spring Valley, California, Klutz Biological
Consulting, December 11th, 2018

Focused Noise Analysis

Response to Second Iteration Noise Issues for Jamacha Building, County of San Diego, Eilar Associates, Inc.,
October 15, 2024

Hydrology & Stormwater Quality

CEQA Drainage / Hydrology Study Jamacha Blvd. Building, Spring Valley, CA, Bajoua Engineering,
September 19, 2022

Stormwater Quality Management Plan (SWQMP) for Standard Projects & Attachment 1: Stormwater Intake
Form, February 2, 2023

Transportation & Traffic

Jamacha 12ksf Office Building Traffic Impact Study, LOS Engineering, Inc., November 7, 2028

Service Availability Forms

Project Facility Availability – Fire, January 7, 2025

Project Facility Availability – Water, November 20, 2024

Project Facility Availability – Sewer, November 7, 2024

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.sdcounty.ca.gov/PDS/gpupdate/docs/BOS_Aug2011/EIR/FEIR_5.00_-_References_2011.pdf

California Department of Conservation. 2024. Tsunami Hazard Areas.

<https://www.conservation.ca.gov/cgs/tsunami/maps/san-diego>

California Department of Water Resources. 2024. Dam Breach Inundation Map Web Publisher.

https://fmds.water.ca.gov/webgis/?appid=dam_prototype_v2

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. 2011a. General Plan Update Environmental Impact Report (2011).

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

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

County of San Diego. 2021. County of San Diego Guidelines for Determining Significance Hydrology and Water Quality.

<https://www.sandiegocounty.gov/content/dam/sdc/pds/docs/Hydrology%20and%20Water%20Quality%20-%20FINAL%20Signed.pdf>

State Water Resources Control Board. 2022. 2020-2022 California Integrated Report.

https://www.waterboards.ca.gov/water_issues/programs/water_quality_assessment/2020_2022_integrated_report.html

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