County of San Diego

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March 25, 2021

Statement of Reasons for Exemption from Additional Environmental Review and 15183 Checklist

Pursuant to CEQA Guidelines §15183

Project Name: Spring Valley Shopping Center
Project Record Numbers: PDS2019-STP-97-050W3, PDS2020-AD-20-002, PDS2020-BC-20-0026
Environmental Log Number: PDS2019-ER-19-18-006
APN(s): 584-511-16-00, 584-511-18-00, 584-511-19-00, 584-511-20-00

Lead Agency Name and Address:
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John Leavitt, Project Manager
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Project Location:
The Spring Valley Shopping Center project (Project) is located within the unincorporated Community Planning area of Spring Valley in central San Diego County. The 12.71-acre Project site is located at 935 Sweetwater Road in Spring Valley. The Project site is bordered by Sweetwater Road to the West, Jamacha Road to the North and Saint George Street to the South. Commercial use types are across the street from the Project site to the West and North and are adjacent to the Project site to the Northeast. Residential use types are across the street from the Project site to the South and adjacent to the Project site to the Southeast.

Project Applicant Name and Address:
John Zeibarth
2900 Fourth Avenue #204
San Diego, CA 92103

General Plan
Community Plan: Spring Valley
Regional Category: Village
Land Use Designation: General Commercial
Density: -

Zoning
Use Regulation: General Commercial (C36)
Minimum Lot Size: -
Special Area Regulation**:** Community Design Review Area (B)

Description of Project
The Project is a Site Plan Modification, Administrative Permit for Shared Parking and a Boundary Adjustment. The Project site contains two legal lots consisting of four parcels (APNs: 584-511-16-00, 584-511-18-00, 584-511-19-00, 584-511-20-00) totaling 12.71 acres and is located at 935 Sweetwater Road, Spring Valley, CA in the Spring Valley Community Plan area, within unincorporated San Diego County. The Project site is subject to the Village General Plan Regional Category, Land Use Designation General Commercial. Zoning for the site is General Commercial (C36). The Project is consistent with the requirements of the General Plan and Zoning Ordinance.

Existing Project Site Description:
The Project site contains an existing shopping center with the following existing structures and features:

- APN 584-511-16-00 has an existing 37,800 square-foot building with a single retail tenant.
- APN 584-511-19-00 has an existing 94,749 square-foot building with three retail tenants and a 3,185 square-foot attached storage building.
- APN 584-511-18-00 has an existing 740-square foot building with a single drive-through restaurant tenant.
- One 35-foot tall Freeway-Oriented Freestanding Sign along Sweetwater Road.
- One 25-foot tall Freestanding Sign along Jamacha Road
- One 19-foot tall Freestanding Sign along Jamacha Road
- 700 Parking Spaces

The Project site currently has driveway access to Sweetwater Road, Jamacha Road and Saint George Street. Water is provided by the Helix Water District and sewer service is provided by the San Diego County Sanitation District.

Proposed Project Description:
The applicant proposes the following improvements to the existing shopping center on the Project site:

- Demolish the existing 3,185-square foot storage building attached to the existing 94,749-square foot building on APN 584-511-19-00, and construct a new 17,400 square-foot structure (Identified as Building D) for a single tenant with drive-through pharmacy window and construct a new trash enclosure at the rear.
- Tenant improvement to the existing 37,800-square foot building on APN 584-511-16-00 for a new sub-tenant (Identified as Building E.2) and construct a new trash enclosure at the rear for the new sub-tenant.
- Construct a new 4,500 square-foot structure (Identified as Building G) along Sweetwater Road for multiple tenants, including one drive-through restaurant tenant, and construct a new trash enclosure in parking lot.

- Construct a new 4,490 square-foot structure (Identified as Building F) at the corner of Sweetwater Road and Saint George Street for a single drive-through restaurant tenant and construct a new trash enclosure in parking lot.
- New wall signage on new Buildings D, G and F. New wall signage for new sub-tenant (Building E.2) on the existing 37,800-square foot building.
- Replace copy of signage on the existing 35-foot tall Freeway-Oriented Freestanding Sign for new sub-tenant in Building E.2 and new tenants in Buildings D, G and F.
- Replace copy of signage on the existing 25-foot tall Freeway-Oriented Freestanding Sign for new sub-tenant in Building E.2 and new tenants in Buildings D, G and F.

The applicant also proposes to widen the existing Jamacha Driveway entrance to 36 feet, relocate existing utilities and easements for the construction of Building D, relocate two (2) existing pole lights to accomodate the placement of new Buildings G and F, add two (2) new pole lights next to proposed Building G, and provide new stripping on northbound Sweetwater Road. The Project site will continue to have driveway access to Sweetwater Road, Jamacha Road and Saint George Street. Water will continue to be provided by the Helix Water District and sewer service will continue to be provided by the San Diego County Sanitation District. Total project earthwork will consist of 970 cubic yards of cut with 530 cubic yards of fill.

The Project also consists of a Boundary Adjustment and an Administrative Permit for Shared Parking. The boundary adjustment is necessary to adjust the legal lot boundaries of the Project site in order to accommodate the placement of proposed Building F. The Administrative Permit for Shared Parking is necessary to authorize a proposed reduction in parking spaces below what the zoning ordinance requires for the Project site for the existing structures and the addition of the proposed structures. The Spring Valley Shopping Center is considered to be a Retail Sales and Services Occupancy Use which has an Off-Street Parking requirement of 4.5 parking spaces per 1,000 square feet of gross floor area (GFA). For this Occupancy Use, total eating, drinking and entertainment uses cannot exceed 15% of a project's GFA. The existing shopping center consists of a total of 133,289 square feet of GFA, with a parking space requirement of 600 total off-street spaces. 700 off-street spaces currently exist onsite. The applicant proposes to add 26,390 square feet of structures to the existing shopping center, for a total of 159,679 square feet of GFA. This GFA would require 719 total off-street parking spaces per the zoning ordinance. The applicant proposes a reduction in off-street parking spaces to 4.0 parking spaces per 1,000 square feet of gross floor area (GFA) with total eating, drinking and entertainment uses not exceeding 10% of the project's GFA. This reduction would require the shopping center to provide a minimum total of 639 off-street parking spaces. The applicant proposes a total of 645 off-street parking spaces. The requested parking space reduction to 4.0 parking spaces per 1,000 square feet equates to 80 less spaces than the zoning ordinance requires while the Project plans indicate the actual proposed space reduction to 645 spaces equates to 74 less spaces than the zoning ordinance requires. If the Project is approved, a Shared Parking Agreement will be recorded with the Administrative Permit.

Discretionary Actions:
The Project consists of a Site Plan Modification, Administrative Permit for Shared Parking and a Boundary Adjustment.

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 in order to reduce the potential for growth in the eastern areas. The objectives of this population distribution strategy are to: 1) facilitate efficient, orderly growth by containing development within areas potentially served by the San Diego County Water Authority (SDCWA) or other existing infrastructure; 2) protect natural resources through the reduction of population capacity in sensitive areas; and 3) retain or enhance the character of communities within the unincorporated County. The SDCWA service area covers approximately the western one third of the unincorporated County. The SDWCA boundary generally represents where water and wastewater infrastructure currently exist. This area is more developed than the eastern areas of the unincorporated County, and would accommodate more growth under the GPU.

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

Summary of Findings

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

A comprehensive environmental evaluation has been completed for the Project as documented in the attached §15183 Exemption Checklist. This evaluation concludes that the Project qualifies for an exemption from additional environmental review because it is consistent with the development density and use characteristics established by the County of San Diego General Plan, as analyzed by the San Diego County General Plan Update Final Program 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 would result in commercial development within an existing commercial center which is consistent with the General Commercial (C36) Use Regulation, as well as the General Commercial Land Use Designation established by the General Plan and the certified GPU EIR.

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. The Project site is located in an area developed with similar commercial development. The property does not support any peculiar environmental features, and the Project would not result in any peculiar effects.

   In addition, as explained further in the 15183 Checklist below, all Project impacts were adequately analyzed by the GPU EIR. Applicable mitigation measures specified within the GPU EIR have been made conditions of approval for this Project.

3. **There are no potentially significant off-site and/or cumulative impacts which the GPU EIR failed to evaluate.**
   The Project is consistent with the County Zoning Ordinance and General Plan land use regulations. The GPU EIR considered the incremental impacts of the Project, and as explained further in the 15183 Exemption Checklist below, no potentially significant off-site or cumulative impacts have been identified which were not previously evaluated.

4. **There is no substantial new information which results in more severe impacts than anticipated by the GPU EIR.**
   As explained in the 15183 Checklist below, no new information has been identified which would result in a determination of a more severe impact than what had been anticipated by the GPU EIR.

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

	March 25, 2021
Signature	Date
John Leavitt	**Land Use/ Environmental Planner**
Printed Name	Title

CEQA Guidelines §15183 Exemption Checklist

Overview

This checklist provides an analysis of potential environmental impacts resulting from the Project. Following the format of CEQA Guidelines Appendix G, environmental effects are evaluated to determine if the Project would result in a potentially significant impact triggering additional review under 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 technical studies used to support the analysis is attached in Appendix A. Appendix B contains a list of GPU EIR mitigation measures.

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

Discussion

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

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

As described in the GPU EIR, 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.

Project site is located at 935 Sweetwater Road in Spring Valley, within the unincorporated County of San Diego. Sweetwater Road boarders the project site to the West, Jamacha Road to the North and Saint George Street to the South. The following resource conservation areas are located in close proximity to the Project site: Sweetwater Resource Conservation Area, located 0.07 miles to the south; Dictionary Hill, located 0.37 miles to the northeast of the project site; and habitat for San Diego Variegated Dudleya and San Diego Ambrosia within a quarter mile of the site. These RCA's are recognized for their biological value and are not further discussed within this response.

The development proposed on the project site would be consistent with surrounding commercial development, and would not result in a substantial adverse effect on a scenic vista. Primary viewer groups would include vehicular and pedestrian travelers along Jamacha Road and Sweetwater Road.

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

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

No Scenic Highways designated by Caltrans are in proximity to the Project site. A portion of State Route (SR) 125 is designated as a Scenic Highway, and this portion is the Scenic Highway in closest proximity to the project site. This designated portion of SR 125 is located 2.5 miles to the north of the project site. Additionally, County Scenic Highway State Routes 94 and Avocado Boulevard are located approximately 2.5 miles north of the project site. No direct views to the Project site are available from the Scenic Highway portion of SR-125, SR-94, or Avocado Boulevard due to constraining intervening topography and distance.

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

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

The Project site is within the village boundary area of the Spring Valley Community Plan. Sweetwater Road borders the project site to the West, Jamacha Road to the North and Saint George Street to the South. The existing visual character and quality of the Project surroundings are characterized by commercial use types across the road to the West and North, and adjacent to the Project site to the Northeast; and residential use types across the road to the South and adjacent to the Project site to the Southeast.

The Project is commercial development within an existing commercial center. The Project within the landscape would not detract from or contrast with existing visual character for the following reasons: the proposed use type is consistent with the General Plan and Zoning Ordinance, and would not introduce any visually dominant features which would detract from the visual quality of the site or surrounding area, and the proposed use type is consistent with the existing use types within the surrounding area.

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

1(d) The GPU EIR concluded this impact to be significant and unavoidable. The Project would use outdoor lighting but is not located within Zone A of the County of San Diego Light Pollution Code (within twenty miles of the Mount Laguna Observatory or the Palomar Observatory). The Project is located within Zone B of the Light Pollution Code (at least twenty miles of the Mount Laguna Observatory or the Palomar Observatory) and would not adversely affect nighttime views or astronomical observations because the Project would be required to conform to the Light Pollution Code (Section 51.201-51.209). This would include the utilization of the Zone B lamp type and shielding requirements per fixture and hours of operation limitations for outdoor lighting and searchlights. 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 light pollution on nighttime views. Compliance with the Code would be required prior to issuance of a building permit. Thus, the proposed Project would not create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area.

As previously discussed, the GPU EIR determined impacts from light or glare to be significant and unavoidable. However, the proposed Project would have a less than significant impact with no required mitigation for the reasons detailed above. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

Conclusion

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

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

2. Agriculture/Forestry Resources

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

Discussion

2(a) The GPU EIR concluded this impact to be significant and unavoidable. According to the Farmland Mapping and Monitoring Program (FMMP) the Project site is classified as “Urban Built-up Land” and does not contain Prime or Unique Farmland, or Farmland of Local or State Importance. A portion of the site is considered to have Prime Soils, however the site has been paved and developed by the previous commercial uses, and no new disturbance would occur. As such, the soil structure and quality has likely been compromised due to soil compaction from development and grading. Additionally, the Project site does not contain 10 acres or contiguous Prime Farmland or Statewide Importance Soils as defined by the FMMP. Therefore, no potentially significant impact or conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide or Local Importance to a non-agricultural use would occur as a result of this Project.

As previously discussed, the GPU EIR determined impacts from direct and indirect conversion of agricultural resources to be significant and unavoidable, However, the proposed Project would have a less than significant impact to agricultural resources. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

2(b) The GPU EIR concluded this impact to be less than significant with mitigation. The Project site is zoned for General Commercial (C36) which allows for commercial land use types by right. No existing agricultural use exists onsite or in the immediate proximity of the Project site. The nearest agricultural preserve is located approximately 6.3 miles northeast of the Project site. The nearest lands under Williamson Act Contract are located approximately 6.3 miles northeast of the Project site. Due to distance, no land-use interface conflicts would occur. Additionally, the Project is commercial development within an existing commercial center, which is compatible with the surrounding land use types. Therefore, the Project would not conflict with existing zoning for agricultural use or a Williamson Act Contract.

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

2(c) Forestry Resources were not specifically analyzed under the GPU EIR because Appendix G of the State CEQA Guidelines was amended to include significance criteria for forestry resources after the release of the Notice of Preparation for the GPU EIR.

The project site including any offsite improvements do not contain any forest lands as defined in 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 13 miles to the west 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.

As previously discussed, Forestry Resources were not specifically analyzed under the GPU EIR because Appendix G of State 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 for the reasons detailed above, the Project would not increase impacts identified within the GPU EIR.

2(d) Forestry Resources were not specifically analyzed under the GPU EIR because Appendix G of the State CEQA Guidelines was amended to include significance criteria for forestry resources after the release of the Notice of Preparation for the GPU EIR. However, as indicated in response 2(c), the Project site, or any off-site improvements, are not located near any forest lands. Therefore, because the project would have a less than significant impact for the reasons detailed above, the Project would not increase impacts identified within the GPU EIR.

2(e) The GPU EIR concluded this impact to be significant and unavoidable. No agricultural operations are currently taking place on the Project site. In addition, no impacts would occur in association with interface conflicts. Please refer to response 2(a) and 2(b) for a discussion on off-site agricultural resources and interface conflicts.

As previously discussed, the GPU EIR determined impacts from direct and indirect conversion of agricultural resources (including forest resources) to be significant and unavoidable. However, the Project would have a less than significant impact to agricultural

resources. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

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

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

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

Discussion
An Air Quality Technical Report was prepared for the Project by Helix Environmental Planning dated March 2021.

3(a) The GPU EIR concluded this impact to be less than significant. The 2016 RAQS is based on projections for residential, commercial, industrial, and recreational land uses contained in the current General Plan, adopted in 2011. The General Plan designates the Project site as General Commercial. The RAQS and SIP are based on General Plans within the region and the development assumptions contained within them. The Project proposes commercial development within an existing commercial center consistent with the County

General Plan and the Zoning Ordinance. Thus, the Project would not conflict with 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 provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

3(b) The GPU EIR concluded impacts to be significant and unavoidable. Construction emissions of all criteria pollutants, including PM10, PM2.5, NOX, and VOCs, would be below the daily thresholds with the incorporation of standard construction BMPs. In addition, because the project's construction emissions would be below screening-level thresholds, which were developed by SDAPCD and SCAQMD to attain the NAAQS and CAAQS, project construction would not conflict with the NAAQS or CAAQS. The NAAQS and CAAQS identify concentrations of pollutants in the ambient air below which no adverse effects on the public health and welfare are anticipated.

The Project's emissions of all criteria pollutants during operation would be below the daily thresholds. The Project would be consistent with the RAQS and would not create a CO hotspot that would result in a cumulatively considerable net increase of CO. Therefore, Project operations would not create a cumulatively considerable net increase in criteria pollutants. In addition, because the project's operational emissions would be below screening-level thresholds, which were developed by SDAPCD and SCAQMD to attain the NAAQS and CAAQS, project operations would not conflict with the NAAQS or CAAQS.

As previously discussed, the GPU EIR determined significant and unavoidable impacts to air quality violations. However, as provided in the above analysis, the Project would not violate any air quality standard or contribute substantially to an existing or projected air quality violation. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

3(c) The GPU EIR concluded this impact to be significant and unavoidable. The Project would contribute to particulate pollution (PM10), nitrogen oxide gases (NOx), and volatile organic compounds (VOCs) emissions from construction/grading activities; however, the incremental increase would not exceed established screening thresholds (see question 3(b) above).

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

3(d) The GPU EIR concluded this impact to be significant and unavoidable. The Project would introduce a point source of significant emissions and is not located within a quarter mile of any identified sensitive receptors. The Project does not propose uses or activities that would result in exposure of sensitive receptors to significant pollutant concentrations and would not place sensitive receptors near any Carbon Monoxide hotspots.

As previously discussed, the GPU EIR determined significant and unavoidable impacts to sensitive receptors. However, the Project would have a less than significant impact to

sensitive receptors. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

3(e) The GPU EIR concluded this impact to be less than significant. The Project could produce objectionable odors during grading, construction, and operation of the commercial components; however these substances, if present at all, would only be in trace amounts (less than 1 µg/m3). 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 provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

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

1. No peculiar impacts to the Project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. No mitigation measures contained within the GPU EIR would be required because Project specific impacts would be less than significant 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
4. Biological Resources – Would the Project:			
a) Have a substantial adverse effect, either directly or through habitat modifications, on any candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☐
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?	☐	☐	☐
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or	☐	☐	☐

with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?			
e) Conflict with the provisions of any adopted Habitat Conservation Plan, Natural Communities Conservation Plan, other approved local, regional or state habitat conservation plan or any other local policies or ordinances that protect biological resources?	☐	☐	☐

Discussion

4(a) The GPU EIR concluded this impact to be significant and unavoidable. Biological resources on the project site were evaluated through the County's Geographical Information System (GIS). The entire site has been developed and does not contain any sensitive species. Therefore, no impacts would occur to any sensitive biological resources as a result of the Project. The site is located within the MSCP but is not designated as a Pre-approved Mitigation Area (PAMA) or a Biological Resource Core Area (BRCA).

As previously discussed, the GPU EIR determined impacts to special status species as significant and unavoidable. However, the Project was determined to have a less than significant impact. Therefore, the Project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

4(b) The GPU EIR concluded this impacts to be significant and unavoidable. Based on an analysis of the County's Geographic Information System (GIS), no wetlands or jurisdictional waters were found onsite or offsite and no sensitive habitats were identified on the site. Therefore, there would be no direct or indirect impacts from the Project to sensitive natural communities identified in the RPO, NCCP, Fish and Wildlife Code, and Endangered Species Act.

As previously discussed, the GPU EIR determined impacts to riparian habitat and other sensitive natural communities as significant and unavoidable. However, the Project was determined to have a less than significant impact. Therefore, the Project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

4(c) The GPU EIR concluded this impact to be less than significant with mitigation. The proposed Project site does not contain any wetlands as defined by Section 404 of the Clean Water Act, therefore, no impacts would occur. As previously discussed, the GPU EIR determined impacts to federally protected wetlands as less than significant with mitigation. As the Project would have a less than significant impact for the reasons detailed above, the Project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

4(d) The GPU EIR concluded this impact to be significant and unavoidable. Based on a GIS analysis, it was determined that the site is not part of a regional linkage/corridor as identified on MSCP maps nor is it in an area considered regionally important for wildlife dispersal. The site would not assist in local wildlife movement as it lacks connecting vegetation and visual continuity with other potential habitat areas in the general project vicinity.

As previously stated, the GPU EIR determined impacts to wildlife movement corridors as 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 increase impacts identified within the GPU EIR.

4(e) The GPU EIR concluded this impact to be less than significant. The project is consistent with the MSCP, Biological Mitigation Ordinance, and Resource Protection Ordinance (RPO). The project will not conflict with the provisions of any adopted Habitat Conservation Plan, Natural Communities Conservation Plan, other approved local, regional or state habitat conservation plan or any other local policies or ordinances that protect biological resources.

As previously discussed, the GPU EIR determined impacts on local policies and ordinances as well as habitat conservation plans and natural community conservation plans as less than significant. As the Project would have a less than significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

Conclusion

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

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

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
5. Cultural Resources – Would the Project:			
a) Cause a substantial adverse change in the significance of a historical resource as defined in 15064.5?	☐	☐	☐
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to 15064.5?	☐	☐	☐
c) Directly or indirectly destroy a unique geologic feature?	☐	☐	☐
d) Directly or indirectly destroy a unique paleontological resource or site?	☐	☐	☐

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

Discussion

5(a) The GPU EIR concluded this impact to be less than significant with mitigation. Based on an analysis of records by County staff archaeologist, Donna Beddow, it has been determined that there are no historical resources present. Based on the absence of resources, mitigation is not required.

As previously discussed, the GPU EIR concluded impacts on historic resources to be less than significant with mitigation. However, the proposed Project determined impacts on historic resources to be less than significance with no required mitigation. Therefore, the Project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

5(b) The GPU EIR concluded this impact to be less than significant with mitigation. Based on an analysis of records and a survey of the property by Staff archaeologist, Donna Beddow, it has been determined that there are no impacts to archaeological resources because they do not occur within the project site. In addition, eight tribes (Barona, Campo, Jamul, Kwaaymii, Manzanita, Santa Ysabel, Sycuan, Viejas) were contacted for Native American consultation. Only one tribe (Jamul) responded requesting consultation. No tribal cultural resources were identified during consultation and Jamul agreed that since the project site is fully developed, that neither a cultural study nor monitoring would be required.

As considered by the GPU EIR, potential impacts to cultural resources will be mitigated through ordinance compliance and through implementation of the following mitigation measures: conformance with the County's Cultural Resource Guidelines if resources are encountered. The GPU EIR identified this mitigation measures as Cul-2.5.

As previously discussed, the GPU EIR determined impacts to archaeological resources as less than significant with mitigation. The Project determined impacts to archaeological resources as less than significant with mitigation consistent with the GPU EIR mitigation measure Cul-2.5. Therefore, the Project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

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

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 (project proposes 950 cubic yards of cut), as such a paleontological monitoring program is not required.

As considered by the GPU EIR, potential impacts to paleontological resources will be mitigated through ordinance compliance and through implementation of the following mitigation measures: conformance with the County's Paleontological Resource Guidelines

if resources are encountered. The GPU EIR identified these mitigation measures as Cul-3.1.

As previously discussed, the GPU EIR determined impacts on paleontological resources as less than significant with mitigation. However, the Project determined impacts to paleontological resources as less than significant with consistency to GPU EIR mitigation measures Cul-3.1. 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.

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. 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 cultural/paleontological resources, the following findings can be made:

1. No peculiar impacts to the Project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. Feasible mitigation measures contained within the GPU EIR (Cul-2.5 and 3.1) as detailed above 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 GHGs, while protecting public health and contributing to a more sustainable environment. Policies, COS-15.1, COS-15.2, and COS-15.3 would support this goal by encouraging design and construction of new buildings and upgrades of existing buildings to

maximize energy efficiency and reduce GHG. Goal COS-17 promotes sustainable solid waste management Policies COS-17.1 and COS-17.5 would support this goal by reducing GHG emissions through waste reduction techniques and methane recapture. The analysis below specifically analyzes the energy use of the Project.

6(a) The Project would increase the demand for electricity and natural gas at the Project site, and gasoline consumption in the Project area during construction and operation relative to existing conditions. CEQA requires mitigation measures to reduce "wasteful, inefficient and unnecessary" energy usages (Public Resources Code Section 21100, subdivision [b][3]). Neither the law nor the State CEQA Guidelines establish criteria that define wasteful, inefficient, or unnecessary use. Compliance with the California Code of Regulations 2019 Title 24 Part 6 Building Code would result in highly energy-efficient buildings. However, compliance with building codes does not adequately address all potential energy impacts during construction and operation. It can be expected that energy consumption, outside of the building code regulations, would occur through the transport of construction materials to and from the site during the construction phase and the use of personal vehicles by residents.

Grading and Construction

During the grading and construction phases of the Project, the primary energy source utilized would be petroleum from construction equipment and vehicle trips. To a lesser extent, electricity would also be consumed for the temporary electric power for as-necessary lighting and electronic equipment. Activities including electricity would be temporary and negligible; therefore, electricity use during grading and construction would not result in wasteful, inefficient, or unnecessary consumption of energy. Any 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 needs for the Project construction would be temporary and is not anticipated to require additional capacity or increase peak or base period demands for electricity or other forms of energy. Construction equipment use and associated energy consumptions would be typical of that associated with the construction of residential projects of this size in a semi-rural setting. Additionally, The Project is consistent with the General Plan and Zoning Ordinance. Thus, 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 land uses, and project design features to reduce energy usage on-site would be implemented as detailed below in section 8 Greenhouse Gas Emissions. Project operation is not anticipated to result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources.

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 would be required to comply with the 2019 Title 24 Energy Code; Assembly Bill 341, which requires 75 percent diversion of on-going operational waste through reuse and recycling; and the 2019 California Green Building Standards Code, which requires 50 percent diversion of on-site construction waste and reduction of potable water use and wastewater generation by 20 percent. Additionally, the Project would provide, low-emitting, fuel-efficient, and carpool-only parking, bicycle parking, and shared parking for the multiple tenants. For outdoor water conservation and reduction, the Project would comply with the County's Water Conservation in Landscaping Ordinance and would demonstrate a 40 percent reduction in current Maximum Applied Water Allowance.

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

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

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

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

e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	☐	☐	☐

Discussion

7(a)(i) The GPU EIR concluded this impact to be less than significant. The site is located in the tectonically active southern California area and will therefore likely experience shake effects from earthquakes. The type and severity of the seismic hazards affecting a site are to a large degree dependent upon the distance to the causative fault, the intensity of the seismic event, and the underlying soil characteristics.

The Project is not located in a fault rupture hazard zone identified by the Alquist-Priolo Earthquake Fault Zoning Act, Special Publication 42, Revised 1997, Fault-Rupture Hazards Zones in California, nor is it located within a known Active Fault Near-Source Zone. The County Guidelines for Determining Significance for Geologic Hazards consider a project to have a potentially significant impact if the project proposes any building or structure to be used for human occupancy over or within 50 feet of the trace of an Alquist-Priolo fault or County Special Study Zone Fault. The Project site is located approximately 7.9 miles east from the nearest Alquist-Priolo Fault Zone and 2.4 miles east from the nearest know fault zone. Additionally, construction in accordance with the California Building Code Seismic Requirements would be required prior to the issue of a building permit. Therefore, a less than significant impact from the exposure of people or structures to adverse effects from a known fault-rupture hazard zone would occur as a result of the proposed Project.

7(a)(ii) 7(a)(ii) The GPU EIR concluded this impact to be less than significant 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 geotechnical report with proposed foundation recommendation would be required to be approved before the issuance of a building permit per California Building Code Sections 1803 and 1804. The GPU EIR identified the standard condition of a Geotechnical Report within section 2.6.3.1, Federal, State and Local Regulations and Existing Regulatory Processes, Liquefaction.

Conditions of Approval

The following list includes the Project conditions of approval:

Geotechnical Report

- A California Certified Engineering Geologist shall complete a final soils report specific to the preliminary design of the proposed development and submit the final soils report to PDS. The findings shall be reviewed and approved by the Director of the County Department of Planning and Development Services or designee.

Therefore, with implementation of the above standard County requirement for compliance with the California Building Code and the County Building Code, it would ensure that the Project would not result in a significant impact due to strong seismic ground shaking or seismic-related ground failure.

7(a)(iii) The GPU EIR concluded this impact to be less than significant. The project site is located within a “Potential Liquefaction Area” as identified in the County Guidelines for

Determining Significance for Geologic Hazards and is underlain by high shrink swell soils (expansive soils). As stated previously, the County requires a geotechnical report with proposed foundation recommendations to be approved prior to the issuance of a building permit. Additionally, the Project site has been previously developed and paved, and is mostly flat with minimal to no slopes on-site. Therefore, the Project is unlikely to result in in any impacts from liquefaction.

7(a)(iv) The GPU EIR concluded this impact to be less than significant. The site is 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. Landslide Susceptibility Areas were developed based on landslide risk profiles included in the Multi-Jurisdictional Hazard Mitigation Plan, San Diego, CA (URS, 2004). Landslide risk areas from this plan were based on data including steep slopes (greater than 25%); soil series data (SANDAG based on USGS 1970s series); soil-slip susceptibility from USGS; and Landslide Hazard Zone Maps (limited to western portion of the County) developed by the California Department of Conservation Division of Mines and Geology (DMG). Also included withing Landslide Susceptibility Areas are gabbroic soils on slopes steeper than 15% in grade because these soils are slide prone. The Project site has been previously developed and paved, and is mostly flat with minimal to no slopes on-site. Therefore, the potential hazards associated with landslides are less than significant. In addition, a soils compaction report with proposed foundation recommendation would be required to be approved before the issuance of a building permit.

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 geological soils report, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

7(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 Placentia sandy loam, 2 to 9 percent slopes (PeC), Diablo-Urban land complex, 5 to 5 percent slopes (DcD), and Las Flores loamy fine sand, 2 to 9 percent slopes (LeC), that have a soil erodibility rating of unrated (DcD) and severe (PeC and LeC). However, the Project would not result in substantial soil erosion or the loss of topsoil because the Project would be required to comply with the Watershed Protection Ordinance (WPO) and Grading Ordinance which would ensure that the Project would not result in any unprotected erodible soils, would not substantially alter existing drainage patterns, and would not develop steep slopes. Additionally, the Project would be required to implement BMPs per the Priority Development Project Storm Water Quality Management Plan to prevent fugitive sediment. Please see 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 provided within the GPU EIR because it would not increase impacts identified within 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 located within a "Landslide Susceptibility Area" as identified in the County Guidelines for Determining Significance for Geologic Hazards; however potential hazards associated with landslides have been determined to be less than significant due the

Project site's being primarily flat with minimal to no slopes. Lateral spreading is a principal effect from liquefaction. The site is not located within a potential liquefaction area.

Lateral spreading is a principal effect from liquefaction which was discussed in response 7(a)(iii). As discussed in response 7(a)(iii), the project site is located within a "Potential Liquefaction Area" as identified in the County Guidelines for Determining Significance for Geologic Hazards. In addition, subsidence and collapse may be caused by unstable geological structures or conditions. However, the Project would be required to prepare a Geotechnical Report as described in response 7(a)(ii) and would be required to conform to the California Building Code to ensure no impacts would occur.

As previously discussed, the GPU EIR determined impacts from soil stability to be less than significant. As the proposed Project would have a less than significant impact with the incorporation of the standard Project condition for a Geological Soils Report, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

7(d) The GPU EIR concluded this impact to be less than significant. As stated in response 7(a)(ii) and 7(a)(iii), the Project site is underlain with expansive soils, however a Geotechnical Report with proposed foundation recommendation would be required to be approved before the issuance of a building permit per California Building Code Sections 1803 and 1804 would be required as a standard condition of approval.

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

7(e) The GPU EIR concluded this impact to be less than significant. The Project site would rely on public water and sewer for the disposal of wastewater. 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 proposed Project would have a less-than-significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

Conclusion

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

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

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

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

4. No mitigation measures contained within the GPU EIR would be required because Project specific impacts would be less than significant by adhering to the Project conditions of approval, which are consistent with the GPU EIR.

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

Discussion
A Greenhouse Gas Emissions Technical Report was prepared for the project by Helix Environmental dated March 2021.

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

The Project would include the following project design features:

Vehicle Miles Traveled Reduction

- The Project proposes an 11 percent reduction in parking below the County zoning standard for the entire site by reducing the parking provided from 4.5 spaces per 1,000 SF to 4 spaces per 1,000 SF.

- The Project would be located within a quarter mile of seven transit stops along Sweetwater Road, Orville Street and Jamacha Road as well as pedestrian facilities on and adjacent to the Project site.

- The Project would provide low-emitting, fuel-efficient, and carpool/vanpool vehicle parking in accordance with California Green Building Standards Code (CALGreen) requirements. The Project would add 11 clean air vehicle spaces and 7 electric vehicle parking spaces.

- Shared parking would be included on site for the multiple tenants occupying the property. Because this is already occurring on site, the Project's proposed uses would have reduced parking for their respective uses through the shared parking provided on site.

- The Project would provide short-term bicycle parking for customers and long-term bicycle parking for employees in accordance with CALGreen requirements. The Project would provide five short-term bicycle parking spaces and five long-term parking spaces.

Water and Waste Reduction

- A Construction and Demolition Debris Management Plan will be developed to divert debris from construction and demolition away from landfills. In accordance with County Ordinance Sections 68.508 through 68.518, 90 percent of inerts and 70 percent of all other materials from the Project will be recycled.

- The Project would implement reuse and recycling programs to divert at least 75 percent of

operational waste from landfills in accordance with Assembly Bill (AB) 341.

- The Project would provide areas for storage and collection of recyclables and yard waste in accordance with CALGreen Standards in place during time of construction.

- The Project would provide a 20 percent reduction in potable water use associated with plumbing fixtures for the proposed improvements as compared to the baseline water use for the same types of fixtures in accordance with CALGreen.

- The Project would comply with the County's Water Conservation in Landscaping Ordinance requirements for all landscaping associated with the proposed Project and would demonstrate a 40 percent reduction in current Maximum Applied Water Allowance (MAWA) for outdoor water use.

GHG emissions would be associated with the construction phases of the Project through use of off-road heavy equipment, haul trucks, and vehicle trips from construction worker commutes. A detailed discussion of construction assumptions and modeling inputs can be found in the Project's Air Quality Technical Report. Emissions of GHGs related to the construction of the Project would be temporary over a 10-month timeframe. Estimated Construction Greenhouse Gas Emissions, total GHG emissions associated with construction of the Project are estimated at 125 MT CO2e. For construction emissions, SCAQMD guidance recommends that the emissions be amortized (i.e., averaged) over 30 years and added to operational emissions. Averaged over 30 years, the proposed construction activities would contribute approximately 4 MT CO2e emissions per year.

Operational sources of GHG emissions include: (1) energy use (electricity and natural gas); (2) area sources (landscaping equipment and consumer products); (3) vehicle use; (4) solid waste generation; and (5) water conveyance and treatment. Operational emissions were estimated using CalEEMod. The model estimates emissions from vehicle and stationary sources of pollutants. CalEEMod default motor vehicle emission rates are based on the California Air Resources Board's (CARB's) state-wide emission factors for the County region which are incorporated into CalEEMod. The SAFE Vehicles Rule adjustment factors provided by CARB were applied to the emission factors in the model to account for anticipated increased emissions. Default vehicle speeds, trip lengths, trip purpose, and trip type percentages for the drive-thru restaurant, coffee shop, and drug store were used. Trip generation for each land use was based on the Local Mobility Analysis prepared for the Project. As detailed in the Local Mobility Analysis, the Project would result in 1,539 net new average daily trips (ADT).

With implementation of the Project design features and addition of the amortized construction emissions, the Project would result in GHG emissions estimated to be 2,049 MT CO2e per year. Vehicular sources are modeled to be the Project's largest contributor of operational GHG emissions. The emissions estimate, however, is extremely conservative in that it assumes the Project would generate new vehicular trips that would not otherwise occur when the Project would not necessarily generate new trips. Future customers of the Project would utilize other existing retail/service uses similar to what the Project is proposing regardless if the Project gets developed or not. Rather than generating new trips, the Project is anticipated to reroute existing trips from other retail/service uses and would not create a new source of GHG emissions.

In addition, the Project is consistent with the County's General Plan land use designation for the site of General Commercial. The Project would result in an approximately 20% increase in square footage from the existing commercial development within the commercial center. Trips would be similar to those existing from the current commercial uses and would not result in a substantial increase in trips over the current baseline.

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 with the incorporation of Project Design Features, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

8(b) The GPU EIR concluded this impact to be less than significant. There are numerous State plans, policies, and regulations adopted for the purpose of reducing GHG emissions. The principal overall State plan and policy is AB 32 and SB 32, the California Global Warming Solutions Act of 2006. The quantitative goal of AB 32 was to reduce GHG emissions to 1990 levels by 2020. SB 32 requires further reductions of 40 percent below 1990 levels by 2030 and 80 percent below 1990 levels by 2050. These statewide plans and regulations are being implemented at the statewide level, and compliance on a project-specific level is not addressed.

The primary regional plan for the County aimed at reducing GHG emissions by reducing transportation source emissions is SANDAG's Regional Plan. The growth projections included in the Regional Plan, which were used in developing regional sustainability goals to reduce GHG emissions, are based on land use plans developed by cities and by the County. As such, projects that propose development that is consistent with their respective general plan land use designations would be consistent with the growth projections in the Regional Plan. The General Plan designates the Project site as General Commercial. The Project, which is constructing a new drug store, fast food restaurant, and coffee shop within an existing commercial property, would be consistent with the General Plan land use designation. Therefore, because the Project is proposing development consistent with the General Plan, it is correspondingly consistent with the Regional Plan and its goals for reducing GHG emissions on a regional level.

Further, the Project would be located in a VMT efficient area providing a local option for commercial retail uses in proximity to residential development. The Project's average VMT per Service Population is 29.31, which is below the average VMT threshold of 31.90. The Project is anticipated to result in an overall decrease in regional VMT and would therefore contribute to reducing regional GHG emissions in the category that accounts for a large percentage of regional GHG emissions. The Project's other, non-mobile source emissions would be reduced through compliance with various State plans and regulations, such as Title 24 energy efficiency standards, the Renewables Portfolio Standard Program, CALGreen, and AB 341. The Project would also be consistent with the County's General Plan, which includes goals and polices aimed at reducing GHG emissions.

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

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

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

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

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

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

	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?	☐	☐	☐
b) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☐
c) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, or is otherwise known to have been subject to a release of hazardous substances and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☐
d) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐
e) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐

g) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	☐	☐	☐
h) Propose a use, or place residents adjacent to an existing or reasonably foreseeable use that would substantially increase current or future resident's exposure to vectors, including mosquitoes, rats or flies, which are capable of transmitting significant public health diseases or nuisances?	☐	☐	☐

Discussion

A Phase I Environmental Site Assessment (ESA) was prepared for the proposed Project by Salem Engineering Group, Inc. dated April 15, 2020.

9(a) The GPU EIR concluded this impact to be less than significant. The Project would not create a significant hazard to the public or the environment because it does not propose the storage, use, transport, emission, or disposal of Hazardous Substances, nor are Hazardous Substances proposed or currently in use in the immediate vicinity.

One Historical Recognized Environmental Condition was identified on-site and is detailed below:

K-Mart Automobile Service Center

- According to San Diego County Department of Environmental Health (SDCDEH) records, one 1,000-gallon waste oil underground storage tank (UST) was removed in March 1990 from the exterior of the former K-Mart automobile service center adjoining to the north of the building located at 935 Sweetwater Road. The waste oil UST was removed under the regulatory agency supervision of the SDCDEH. Reportedly, the waste oil UST appeared to be in good condition showing no evidence of holes or leaks at the time of removal. Three soil samples were collected from the waste oil UST excavation and analyzed for benzene, toluene, ethylbenzene and xylenes (BTEX). Analytical results of the soil samples indicated no detectable concentrations of constituents of concern in the soil samples analyzed. Following the results of the soil sample analysis, the SDCDEH issued a "no further action" (NFA) designation. The SDCDEH granted regulatory agency "closure" for the waste oil UST on April 24, 1990.

Additionally, one storage building on the Project site would be demolished as part of the proposed Project. This building was built prior to the ban on the use of lead-based paint and asbestos-containing materials in construction. Prior to the demolition of this building, surveys would be required to determine the location, presence, and quantity of hazardous building materials. The Project would be required to comply with Project conditions and applicable regulations to ensure that impacts related to the disposal of hazardous materials from the removal of structures is less than significant.

Conditions of Approval

The following includes the Project conditions of approval:

Structure and Debris Removal

- Structures and debris identified on the approved plan set for the Project as requiring remodeling or demolition would be remodeled or demolished

Lead Survey

- A facility survey would be performed to determine the presence or absence of lead based paint (LBP) and lead containing materials (LCM) in the structures identified for demolition on the approved plan set for the Project. All LBP and LCM would be managed in accordance with applicable regulations including, at a minimum, the hazardous waste disposal requirements (Title 22 California Code of Regulations [CCR] Division 4.5), the worker health and safety requirements (Title 8 California Code of Regulations Section 1532.1), and the State Lead Accreditation, Certification, and Work Practice Requirements (Title 17 CCR Division 1, Chapter 8).

Asbestos Survey

- A facility survey would be performed to determine the presence or absence of Asbestos Containing Materials (ACM) in the structures identified for demolition on the approved plan set for the Project by a person certified by Cal/OSHA pursuant to regulations implementing subdivision (b) of Section 9021.5 of the Labor Code and who has passed an EPA-approved Building Inspector Course.

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

9(b) The GPU EIR concluded this impact to be less than significant. The Project is not located within one-quarter mile of an existing or proposed school. Thus, the Project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of a school.

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

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

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

9(d) The GPU EIR concluded this impact to be less than significant with mitigation. The proposed Project is not located within an airport land use plan, Airport Safety Zone, Avigation Easement, Overflight area, within a Federal Aviation Administration Height Notification Surface Area or within two miles of a public airport. Therefore, the project would not result in a safety hazard for people residing or working in the project area.

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

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

9(f)(i) OPERATIONAL AREA EMERGENCY PLAN AND MULTI-JURISDICTIONAL HAZARD MITIGATION PLAN:
The GPU EIR concluded this impact to be less than significant with mitigation. The Project would not interfere with this plan because it would not prohibit subsequent plans from being established or prevent the goals and objectives of existing plans from being carried out.

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

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

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

9f)(v) DAM EVACUATION PLAN:
The Project site is not located within an identified dam inundation zone. Additionally, the development would not constitute a “Unique Institution” such as a hospital, school, or retirement home pursuant to the Office of Emergency Services included within the County Guidelines for Determining Significance, Emergency Response Plans.

As previously discussed, the GPU EIR determined impacts from emergency response and evacuation plans to be less than significant with mitigation. As the Project would have a less-than-significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR

9(g) The GPU EIR concluded this impact as significant and unavoidable. The Project site is located within an urban unzoned fire hazard severity zone in the California Department of Forestry and Fire Protection (CALFIRE)’s designated Local Responsibility Area (CALFIRE 2020). The Project is in the service area of the San Miguel Fire Protection District (SMFPD) and would be required to comply with the County Fire Code and Consolidated Fire Code.

Additionally, the Maximum Travel Time allowed pursuant to the County General Plan's Safety Element is 5 minutes. The closest SMFPD station to the Project site is located at 2850 Via Orange Way, approximately 2.6 miles northeast of the site, which has capacity to serve the Project. Therefore, the Project would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires.

As previously discussed, the GPU EIR determined impacts from wildland fires to be significant and unavoidable. However, the proposed Project would have a less than significant impact for the reasons detailed above. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

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 facility or other similar uses. There are none of these uses on adjacent properties. 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. However, the proposed Project would have a less-than-significant impact. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

Conclusion

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

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

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

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

4. No mitigation measures contained within the GPU EIR would be required because Project specific impacts would be less than significant by adhering to the Project conditions of approval, which are consistent with the GPU EIR.

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

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

Discussion
Technical studies were prepared for the Project related to hydrology and water quality:

(1) PDP SWQMP dated March 11, 2021 prepared by BWE, Inc. One each for Buildings D and G.
PDP SWQMP dated March 10, 2021 prepared by Joseph C. Truxaw & Associates for Building F.

(2) A Preliminary Drainage Study dated March 2021 prepared by BWE, Inc. One each for Buildings D and G.
A Preliminary Drainage Study dated February 2021 prepared by Joseph C. Truxaw & Associates for Building F.

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. For the Project to avoid potential violations of any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality, storm water management plans are prepared for both phases of the development Project.

During the construction phase, the Project would prepare and implement a Storm Water Pollution Prevention Plan (SWPPP). The SWPPP would implement typical erosion control BMPs such as hydraulic stabilization and hydroseeding on disturbed slopes, silt fencing, fiber rolls, gravel and sandbags, storm drain inlet protection and engineered desilting basin for sediment control. The SWPPP would be prepared in accordance with Order No. 2009-009-DWQ, National Pollutant Discharge Elimination System (NPDES) order CAS000002 Construction General Permit (CGP) adopted by the State Water Resources Control Board (SWRCB) on September 2, 2009.

In the post-construction phase, as outlined in the SWQMP, the Project would implement site design and source control BMPs to prevent potential pollutants from entering storm water runoff. The SWQMP has been prepared in accordance with the County of San Diego BMP Design Manual and SDRWQCB Order No. R9-2013-0001 Municipal Separate Storm Sewer System (MS4) permit (2013), as adopted by the RWQCB on May 8, 2013.

As previously discussed, the GPU EIR determined significant and unavoidable impacts to water quality standards and requirements. However, the proposed Project would have a less than significant impact to water quality standards with the implementation of Project conditions as detailed above. 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 provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

10(b) The GPU EIR concluded this impact to be significant and unavoidable. The Project lies in the La Nacion (909.12) hydrologic subarea, within the Sweetwater hydrologic unit. According to the Clean Water Act Section 303(d) list, a portion of this watershed (San Diego Bay Shoreline; San Diego Bay; Paradise Creek; Sweetwater River) is impaired. The full list of constituents of concern for the Sweetwater watershed is available from the San Diego Regional Water Quality Control Board. The Project would contribute to release of these pollutants; however, the Project would comply with the Watershed Protection Ordinance (WPO) and implement site design measures, source control BMPs, and treatment control BMPs to prevent a significant increase of pollutants to receiving waters.

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

10(c) The GPU EIR concluded this impact to be significant and unavoidable. As stated in responses 9(a) and 9(b) above, implementation of BMPs and compliance with required ordinances would ensure that Project impacts are less than significant.

As previously discussed, the GPU EIR determine significant and unavoidable impacts to water quality standards and requirements and groundwater supplies and recharge. However, the proposed Project would have a less than significant impact with mitigation to water quality standards and requirements, and groundwater supplies and recharge (Hyd-1.2 through Hyd-1.5). Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

10(d) The GPU EIR concluded this impact to be significant and unavoidable. The Project would obtain its water supply from the Helix Water District, which obtains water from surface reservoirs or other imported sources. The Project would not use any groundwater and would not involve operations that would interfere substantially with groundwater recharge.

As previously discussed, the GPU EIR determined significant and unavoidable impacts to groundwater supplies and recharge. However, the proposed Project would have a less than significant impact to groundwater recharge for the reasons stated above. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

10(e) The GPU EIR concluded this impact to be less than significant with mitigation. The Project site is developed and consists of an existing asphalt parking lot and commercial buildings. The site topography is relatively flat and generally flows east to west to Sweetwater Road. The runoff originating from the site drains to an existing storm drain system situated within Sweetwater road via a catch basin and storm drainpipe.

The onsite drainage patterns would be slightly altered by the proposed Project for Building D, however runoff would continue to flow in the same general direction as existing conditions. The 100-year peak flow rates at the two discharge points analyzed by the Drainage study for Building D would be maintained in the proposed condition. Therefore, negative downstream drainage impacts are not anticipated to occur. Stormwater runoff from the site is collected and conveyed by a system of downspouts, concrete gutter,

planters, trench drains and storm drainpipes. The proposed Project for Building D would implement best management practices as outlined in the PDP SWQMP to reduce stormwater quantity impacts to the maximum extent practicable. Four biofiltration basins are proposed for Building D for this purpose. Runoff from the northerly and westerly drainage basin is discharged offsite via an existing curb outlet situated near Sweetwater road. An overflow spillway is proposed for each biofiltration basin to bypass the excess 100-year peak flow rate.

Building F will not adversely impact existing drainage facilities or downstream neighbors. The existing site area for Building F is mostly impervious with approximately 7,800 square feet of landscaping. The landscape area of the Building F portion of the project will increase to approximately 12,900 square feet and will incorporate biofiltration basins. Building F also proposes underground storm vaults to detain a volume of storm water for water quality and hydromodification purposes. The combination of the proposed features will reduce the storm water discharge for the site and will drain to existing points of discharge. The proposed Project for Building F would implement best management practices as outlined in the PDP SWQMP to reduce stormwater quantity impacts to the maximum extent practicable. Two biofiltration basins are proposed for Building D for this purpose.

The onsite drainage patterns would be slightly altered by the proposed Project for Building G, however runoff would continue to flow in the same general direction as existing conditions. The 100-year peak flow rates at the two discharge points analyzed by the Drainage study for Building G would be reduced in the proposed condition. Therefore, negative downstream drainage impacts are not anticipated to occur. Stormwater runoff from the site is collected and conveyed by a system of downspouts, concrete gutter, planters, trench drains and storm drainpipes. The proposed Project would implement best management practices as outlined in the PDP SWQMP to reduce stormwater quantity impacts to the maximum extent practicable. One biofiltration basin is proposed for Building G for this purpose.

In addition, the Project would not result in substantial erosion or siltation on or off-site because as previously stated in response 10(a), storm water management plans are prepared for both the construction and post-construction phases of the development Project. The SWPPP and SWQMP specify and describe the implementation process of all BMPs that would address equipment operation and materials management, prevent the erosion process from occurring, and prevent sedimentation in any onsite and downstream receiving waters. The Department of Public Works would ensure that these Plans are implemented as proposed. Although on-site drainage patterns would be altered, the proposed improvements would ensure the Project would not result in substantial erosion or siltation on or off-site.

As previously discussed, the GPU EIR determined significant and unavoidable impacts to erosion or siltation and less than significant impacts. However, the proposed Project would have a less-than-significant impact to erosion or siltation (Hyd-1.2 through Hyd-1.5). Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

10(f) The GPU EIR concluded this impact to be less than significant with mitigation. As discussed above in response 10(e) the Preliminary Drainage Studies prepared for the Project by BWE, Inc. for Buildings D and G and by Joseph C. Truxaw & Associates for

Building F determined that the proposed Project would not alter the existing drainage pattern in a manner which 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 proposed Project would have a less than significant impact to flooding with the incorporation of design features and improvements. Therefore, the Project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

10(g) The GPU EIR concluded this impact to be less than significant with mitigation. Pursuant to the Preliminary Drainage Studies prepared for the Project by BWE, Inc. for Buildings D and G and by Joseph C. Truxaw & Associates for Building F, the Project would not exceed the capacity of existing or planned storm water drainage systems. Because the Project would reduce the 100-year peak flows, the Project would not contribute runoff to exceed the capacity of the existing drainage system.

As previously discussed, the GPU EIR determined impacts to exceed capacity of stormwater systems as less than significant with mitigation. With mitigation, the proposed Project would have a less-than-significant impact with regards to exceeding the capacity of stormwater systems with mitigation (Hyd-1.2 through Hyd-1.5). Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

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

As previously discussed, the GPU EIR determine impacts to water quality standards and requirements as significant and unavoidable. However, the proposed Project would have a less-than-significant impact to water quality standards with the implementation of Project conditions listed in 10(a). The conditions are consistent with the GPU EIR mitigation measures Hyd-1.2 through Hyd-1.5. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

10(i) 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 or off-site improvement locations. In addition, the Preliminary Drainage Studies prepared for the Project by BWE, Inc. for Buildings D and G and by Joseph C. Truxaw & Associates for Building F also concluded that the Project site does not contain any 100-year flood hazard areas per FEMA. Therefore, the Project would not place housing within a County or federal floodplain or flood way.

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

10(j) The GPU EIR concluded this impact to be less than significant with mitigation. As indicated in 10(i), no FEMA or County-mapped floodplains were identified on the Project site or off-

site improvement locations. Therefore, the Project structures would not impede or redirect flood flows.

As previously discussed, the GPU EIR determined impacts from impeding or redirecting flood flows as less than significant with mitigation. The proposed Project would have a less than significant impact for the reasons detailed above. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

10(k) The GPU EIR concluded this impact to be less than significant with mitigation. The Project site lies outside any identified special flood hazard area and the Project site is not located within a Dam Inundation Zone.

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

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

As previously discussed, the GPU EIR determined impacts from dam inundation and flood hazards and emergency response and evacuation plans as less than significant with mitigation. The proposed Project would have a less-than-significant impact for the reasons detailed above. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

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

10(m)(i) SEICHE: The Project site is not located along the shoreline of a lake or reservoir.

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

10(m)(iii) MUDFLOW: Mudflow is type of landslide. See response to question 7(a)(iv).

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

Conclusion

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

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

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

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

4. Feasible mitigation measures contained within the GPU EIR (Hyd-1.2 through Hyd-1.5) would be applied to the Project. The mitigation measures, as detailed above, requires the Project applicant to comply with Watershed Protection Ordinance, Stormwater Standards Manual, Guidelines for Determining Significance for Hydrology and Water Quality.

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

Discussion

11(a) The GPU EIR concluded this impact to be less than significant with mitigation. The Project does not propose the introduction of new infrastructure such as major roadways, water supply systems, or utilities to the area. Additionally, the site is consistent with surrounding commercial use types. Moreover, build-out of the site was anticipated in the GPU EIR. Therefore, the proposed Project would not physically divide an established community.

As previously discussed, the GPU EIR determined impacts from physically dividing an established community as less than significant with mitigation. However, the proposed Project would have a less-than-significant impact for the reasons detailed above. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

11(b) The GPU EIR concluded this impact to be less than significant. As previously discussed in response 11(a), the Project aligns with the County General plan and Zoning Ordinance as it would implement a land use consistent with the C36 Use Regulation and General Commercial land use designation for the Project site.

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

Conclusion

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

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

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

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

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

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

12(a) The GPU EIR determined that impacts to mineral resources would be significant and unavoidable. The California Surface Mining and Reclamation Act (SMARA) required classification of land into Mineral Resource Zones (MRZs). The Project site has been classified by the California Department of Conservation – Division of Mines and Geology (Update of Mineral Land Classification: Aggregate Materials in the Western San Diego Production-Consumption Region, 1997) as an area of "Potential Mineral Resource Significance" (MRZ-3). However, the Project site is surrounded by commercial use types across the road to the West and North, and adjacent to the Project site to the Northeast; and residential use types across the road to the South and adjacent to the Project site to the Southeast, which are incompatible to future extraction of mineral resources on the Project site. A future mining operation at the Project site would likely create a significant impact to neighboring properties for issues such as noise, air quality, traffic, and possibly other impacts. 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 proposed Project would have a less-than-significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

12(b) The GPU EIR concluded this impact to be significant and unavoidable. The Project site is not located in an Extractive Use Zone (S-82), nor does it have an Impact Sensitive Land Use Designation (24) with an Extractive Land Use Overlay (25). The Project site is not located in an area that has MRZ-2 designated lands nor is located within 1,300 feet of such lands. Additionally, the Project site is surrounded by commercial and residential land uses which are incompatible to future extraction of mineral resources on the Project site. A future mining operation at the site would likely create a significant impact to neighboring properties for issues such as noise, air quality, traffic, and possibly other impacts. 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. However, the proposed Project would have a less than significant impact for the reasons detailed above. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

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

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

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

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

4. The GPU EIR concluded significant and unavoidable impacts to mineral resources, however, the Project would have less than significant impacts for the reasons detailed above. Therefore, the Project would not result in an impact which was not adequately evaluated by the GPU EIR.

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

Discussion
A Noise Report was prepared for the Project by Helix Environmental dated January 11, 2021.

13(a) The GPU EIR concluded this impact to be less than significant with mitigation. The area surrounding the project site consists of mainly residences uses. The project will not expose

people to potentially significant noise levels that exceed the allowable limits of the General Plan, Noise Ordinance, or other applicable standards for the following reasons:

General Plan – Noise Element: Policy 4b addresses noise sensitive areas and requires projects to comply with a Community Noise Equivalent Level (CNEL) of 60 decibels (dBA). The project consists of commercial uses and is not subject to the 60 dB CNEL exterior noise levels. In addition, the Noise Report prepared by Helix Environmental Planning dated January 11, 2021, demonstrated that the project would not expose on or off-site sensitive land uses to noise levels that exceed the required noise limits for exterior and interior use area. The exterior noise impacts at the project site are primarily the result of the drive-thru speaker. A site visit conducted by Helix's Noise Consultant, found that the existing noise levels within the area is 66.2 dBA. The project would not result in exposing existing and future noise sensitive receptors to noise levels that exceed the County's Standard. The increase in ADT from this project would not result in an increase of 3 dBA CNEL on any impacted roadways, therefore, would not expose on- or off-site, existing, and foreseeable future noise sensitive land uses to noise levels that exceed the noise standards.

Noise Ordinance – Section 36-404: Non-transportation noise generated by the project is not expected to exceed the standards of the Noise Ordinance at or beyond the project's property line. The project site as well as surrounding parcels to the north, northeast, and west are zoned commercial, which are subject to the noise limits of 60 dBA daytime and 55 dBA nighttime. The parcels to the south and southeast are zoned Single-Family Residential (RS), which are subject to the arithmetic mean noise levels limit of 55 dBA daytime and 50 dBA nighttime. The main source of operational noise from this project would be from the drive-thru speaker. Based on the noise report, the maximum sound level pressure from the drive-thru speaker is 54 dBA at 32 feet. The speaker will operate at approximately 12 minutes per hour, which reduces the noise levels to 47 dBA. The nearest Noise Sensitive Land Use property line is at least 95 feet away for the equipment. In addition, there is an existing wall along the southern edge of the project site, which will provide further noise attenuation. Based on the distance separation, usage factor, and existing wall, the noise levels from the speaker will be in compliance with the Noise Ordinance, Section 36.404. The project does not involve any noise producing equipment that would exceed applicable noise levels at the adjoining property line.

Noise Ordinance – Section 36-410: The project will not generate construction noise in excess of Noise Ordinance standards. Construction operations will occur only during permitted hours of operation, it is not anticipated that the project will operate construction equipment in excess of an average sound level of 75dB between the hours of 7 AM and 7 PM. Based on the Noise Report, the combined use of an excavator, loader, and dump truck would generate noise levels of 71.9 dBA LEQ. Blasting and/or rock crushing is not proposed. The project will implement best management practices, which will ensure that the noise levels from these activities do not exceed the County's Noise Standards.

As previously discussed, the GPU EIR determined impacts to excessive noise levels as less than significant with mitigation. As the proposed Project would have a less-than-significant impacts with the incorporation of Project conditions discussed in the GPU EIR, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

13(b) The GPU EIR concluded this impact to be less than significant with mitigation. The project does not propose any of the following land uses that can be impacted by groundborne vibration or groundborne noise levels.

1. Buildings where low ambient vibration is essential for interior operation, including research and manufacturing facilities with special vibration constraints.
2. Residences and buildings where people normally sleep including hotels, hospitals, residences and where low ambient vibration is preferred.
3. Civic and institutional land uses including schools, churches, libraries, other institutions, and quiet office where low ambient vibration is preferred.
4. Concert halls for symphonies or other special use facilities where low ambient vibration is preferred.

Also, the project does not propose any major, new or expanded infrastructure such as mass transit, highways or major roadways or intensive extractive industry that could generate excessive groundborne vibration or groundborne noise levels on-site or in the surrounding area. In addition, the project will not propose any equipment such as pile driving or blasting that would result in vibration or ground borne noises.
Therefore, the project will not expose persons to or generate excessive groundborne vibration or groundborne noise on a project or cumulative level.

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

13(c) The GPU EIR concluded this impact to be less than significant with mitigation. As indicated in the response listed under Section 12(a), the project would not expose existing or planned noise sensitive areas in the vicinity to a substantial permanent increase in noise levels that exceed the allowable limits of any applicable noise standards. The project would not result in more than 3 dBA increase on any roadways. Therefore, the project is not expected to expose existing or planned noise sensitive areas to noise 10 dB CNEL over existing ambient noise levels.

As previously discussed, the GPU EIR determined impacts from permanent increase in ambient noise levels to be significant and unavoidable. However, the Project would have a less than significant impact with the incorporation of Project conditions listed in response 13(a). Therefore, the Project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

13(d) The GPU EIR concluded this impact to be less than significant with mitigation. The project does not involve any operational uses that may create substantial temporary or periodic increases in ambient noise levels in the project vicinity. Also, general construction noise is not expected to exceed the construction noise limits of the Noise Ordinance. Construction operations will occur only during permitted hours of operation. Also, the project will not operate construction equipment in excess of 75 dB for more than an 8 hours during a 24 hour period.

As previously discussed, the GPU EIR determined impacts from temporary increase in ambient noise levels to be less than significant with mitigation. However, the proposed Project would have a less than significant impact with Project conditions of approval listed in response 13(a). Therefore, the Project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

13(e) The GPU EIR concluded this impact to be less than significant with mitigation. The Project is not located within an Airport Land Use Compatibility Plan (ALUCP) for airports or within 2 miles of a public airport or public use airport. Therefore, the Project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

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

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

1. No peculiar impacts to the Project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. No mitigation measures contained within the GPU EIR would be required because Project specific impacts would be less than significant by adhering to the Project standard 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)?	☐	☐	☐
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	☐	☐	☐

Discussion

14(a) The GPU EIR concluded this impact to be less than significant. The Project site is designated in the General Plan as General Commercial. The Project is consistent with the General Plan and 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 proposed Project would have a less-than-significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

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

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

14(c) The GPU EIR concluded this impact to be less than significant. The Project does not propose the demolition of any residential structures and thus would not displace a substantial number of people. As such, replacement housing would not be required elsewhere.

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

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

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

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

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

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

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

Discussion
15(a) The GPU EIR concluded this impact to be less than significant with mitigation for the exception of school services, which remained significant and unavoidable. The Project is for the development of commercial land use types within an existing commercial center. 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 in order 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 physical effect on the environment because the Project does not require new or significantly altered services or facilities to be constructed.

The Project would not result in the need for significantly altered services or facilities. As previously discussed, the GPU EIR determined impact to fire protection services, police protection services and other public services as significant with mitigation while school services remained significant and unavoidable. However, as the Project would have a less-than-significant impact for the reasons stated above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

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

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

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

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

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

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

Discussion

16(a) The GPU EIR concluded this impact to be less than significant with mitigation. The Project does not propose any residential use, included but not limited to a residential subdivision, mobile home park, or construction for a single-family residence that may increase the use of existing neighborhood and regional parks or other recreational facilities in the vicinity. No impact to parks or recreation facilities would occur as a result of the Project.

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

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 such as parks.

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

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

Discussion

A Local Mobility Analysis was prepared for the Project by Mizuta Traffic Consultants dated January 2021.

17(a) The GPU EIR concluded this impact to be significant and unavoidable. The County of San Diego Transportation Study Guidelines have been adopted by the County Board of Supervisors on June 24, 2020 to address Senate Bill 743 (SB 743). SB 743 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 new established criteria for determining the significance of transportation impacts is Vehicle Miles Traveled (VMT) and is further addressed below. Although no longer utilized as the standard for evaluating transportation impacts under CEQA, the County's General Plan identified LOS as being a required analysis per Policy M-2.1 and is therefore also addressed.

Section 15064.3 of the CEQA Guidelines details new regulations, effective statewide July 1, 2020, based on SB 743 that sets forth specific considerations for evaluating a project's transportation impacts. As previously discussed, the new established criteria for determining the significance of transportation impacts is Vehicle Miles Traveled (VMT). VMT refers to the amount and distance of automobile travel attributable to a project.

In addition, the County of San Diego has developed an overall programmatic solution that addresses existing and projected future road deficiencies in the unincorporated portion of San Diego County. The Transportation Impact Fee (TIF) program creates a mechanism to proportionally fund improvements to roadways necessary to mitigate potential cumulative impacts caused by traffic from future development. The potential growth represented by this project was included in the growth projections upon which the TIF program is based. The TIF measures was identified by the GPU EIR as Tra-1.7.

A Local Mobility Analysis (LMA) is the tool utilized by the Transportation Study Guidelines to assess projects impacts to LOS. However, the Transportation Study Guidelines have also adopted thresholds for determining when a project must prepare a Local Mobility Analysis based on project type and number of trips. The project is consistent with the County General plan and would result in more than 250 ADT based on the Institute of Transportation Engineers Trip Generation rates. In accordance with the Transportation Study Guidelines, an LMA was required for the project. Therefore, the project would not conflict with an applicable plan, ordinance or policy related to local mobility.

The LMA prepared for the Project by Mizuta Traffic Consultants dated January 2021 evaluated potential improvements required for the Project in accordance with the adopted Transportation Study Guidelines and County Public Road Standards. The LMA determined that the project would generate a total of 2,112 daily trips with 86 trips (52 inbound, 34 outbound) during the AM peak hour and 212 trips (106 inbound, 106 outbound) in the PM peak hour. The additional 95,144 sf of commercial uses already approved on the existing site was added to the existing traffic volumes. The approved commercial uses are forecasted to generate a total of 7,612 daily trips with 306 trips (184 inbound, 122 outbound) during the AM peak hour and 762 trips (381 inbound, 381 outbound) in the PM peak-hour. All intersections in the study area, including the Project driveways, are expected to operate at an acceptable LOS D or better during the peak-hours. Additionally, the Project will restripe the South Project Driveway along Sweetwater Road to include an exclusive lane for left-turning and right-turning vehicles exiting the site.

Local-serving commercial uses, typically those under 50,000 square feet in size, and infill retail developments tend to shift where vehicle trips occur rather than generate wholly new trips (and corresponding vehicle miles traveled). Because the proposed project is less than 50,000 square feet and would be expected to shift where people shop for retail/fast-food rather than increase the amount of new trips on the roadway in the region, it is reasonable to presume that total regional VMT would not increase as a result of the project. The presence of other retail and fast-food establishments in the community also support the conclusion that the project would indeed function as local-serving retail with most customers likely traveling from nearby areas of Spring Valley, with little potential to draw longer trips from the wider region.

A five percent transit reduction credit can be applied to projects if the site has transit access and/or near transit stops within 0.25 miles. There are multiple transit stops that are located along Jamacha Road and Sweetwater Road that meet this criteria. Additionally, pass-by trips are trips that are already on the road network and "passing by" the project site. A pass-by trip credit of 30 percent was used during the PM peak-hour and 22 percent for the AM peak-hour and daily trip forecasts to calculate net trip rates for the Proposed project.

The project is forecasted to generate a total of 2,112 daily trips with 86 AM peak hour trips and 212 PM peak-hour trips. After applying the transit trip credit, the project is forecasted to generate a total of 2,006 daily trips with 83 AM peak-hour trips and 200 PM peak-hour trips at the project driveways. After applying the pass-by trip credit, the project is forecasted to generate a net total of 1,539 daily trips with 69 AM peak-hour trips and 138 PM peak-hour trips.

As previously discussed, the GPU EIR determined significant and unavoidable impacts to unincorporated County traffic and LOS standards. However, the project would have a less than significant impact to County traffic and LOS standards as well as VMT with the incorporation of mitigation as detailed above. The mitigation measures were identified in the GPU EIR as Tra-1.7, Tra-4.4 and Tra-6.9 which require payment into the County TIF program as well as implementation of the County Subdivision Ordinance and the Community Trails Master Plan. In addition, the project would not conflict with SB 743 because it is considered less than 50,000 square feet of a locally serving commercial use or retail and is below the County's adopted VMT threshold. Therefore, the project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

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

As previously stated, Section 15064.3 of the CEQA Guidelines details new regulations, effective statewide July 1, 2020 that sets forth specific considerations for evaluating a project's transportation impacts. As discussed in 17(a), the project would not result in an impact to VMT due to the project consisting of a locally serving commercial use that is less than 50,000 square feet. Additionally, as discussed in 17(a), the Project will restripe the South Project Driveway along Sweetwater Road to include an exclusive lane for left-

turning and right-turning vehicles exiting the site Therefore, the project would not conflict with an applicable congestion management program.

As previously discussed, the GPU EIR determined impacts on significant and unavoidable impacts to unincorporated County traffic and LOS standards. However, the project would have a less than significant impact for the reasons detailed above. Therefore, the project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

17(c) The GPU EIR concluded this impact to be less than significant with mitigation. The Project site is not located within an Airport Influence Area, Airport Safety Zone, Airport Land Use Compatibility Plan Area, Avigation Easement, or Overflight Area. Therefore, the Project would have a less than significant impact to air traffic patterns. The Project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

17(d) The GPU EIR concluded this impact to be significant and unavoidable. The proposed 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.

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

17(e) The GPU EIR concluded this impact to be less than significant with mitigation. The proposed Project would not result in inadequate emergency access. The Project is not served by a dead-end road that exceeds the maximum cumulative length permitted by the County of San Diego Consolidated Fire Code. 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. As the Project would have a less-than-significant impact for the reasons detailed above and is consistent with GPU EIR Mitigation Measure Tra 4.2, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

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

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

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

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

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

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

4. Feasible mitigation measures contained within the GPU EIR (Tra-1.7, Tra-4.2, Tra-4.4 and Tra-6.9) would be applied to the project. The mitigation measures, as detailed above, would require payment into the County TIF Program as well as consistency with the Building Code, Fire Code, County Public Road Standards, Subdivision Ordinance and Community Trails Master Plan.

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

Discussion

18(a) The GPU EIR concluded this impact to be less than significant with mitigation. The Project would discharge domestic waste to a community sewer system that is permitted to operate by the Regional Water Quality Control Board (RWQCB). The project would be served by the San Diego County Sanitation District (SDCSD) which has adequate capacity to serve the Project.

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

18(b) The GPU EIR concluded this impact to be less than significant with mitigation. The Project involves new water and wastewater pipeline extensions. However, these extensions would be on-site, and would not result in additional adverse physical effects beyond those already identified in other sections of this environmental analysis. Water service would be provided by the Helix Water District and sewer service would be provided by the SDCSD.

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

18(c) The GPU EIR concluded this impact to be less than significant with mitigation. The Project proposes new storm water drainage facilities. However, these extensions 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 proposed Project would have a less-than-significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

18(d) The GPU EIR concluded this impact to be significant and unavoidable. The Project would be served water by the Helix Water District which has adequate water capacity to serve the Project.

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

18(e) The GPU EIR concluded this impact to be less than significant with mitigation. The Project would be served by the San Diego County Sanitation District (SDCSD) which has adequate capacity to serve the Project.

As previously discussed, the GPU EIR determined impacts to adequate wastewater facilities be less than significant with mitigation. However, the proposed Project would

have a less-than-significant impact with no required mitigation for the reasons detailed above. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

18(f) The GPU EIR concluded this impact to be significant and unavoidable. All solid waste facilities, including landfills require solid waste facility permits to operate. There are five permitted active landfills in San Diego County with remaining capacity to adequately serve the Project. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts 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. Therefore, the Project would not result in an impact which was not adequately evaluated by the GPU EIR.

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

Discussion

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

19(a) The GPU EIR concluded this impact to be significant and unavoidable. The Project site is located within an urban unzoned fire hazard severity zone in the California Department of Forestry and Fire Protection (CALFIRE)'s designated Local Responsibility Area (CALFIRE 2020). The Project is in the service area of the San Miguel Fire Protection District (SMFPD) and would be required to comply with the County Fire Code and Consolidated Fire Code.

Additionally, the Maximum Travel Time allowed pursuant to the County General Plan's Safety Element is 5 minutes. The closest SMFPD station to the Project site is located at 2850 Via Orange Way, approximately 2.6 miles northeast of the site, which has capacity to serve the Project.

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

19(b) The GPU EIR concluded this impact to be significant and unavoidable. The Project is not within a fire hazard severity zone but is within the Urban-Wildlife Interface Zone. The Project would comply with regulations relating to emergency access, water supply, and defensible space specified in the County Fire Code and Consolidated Fire Code. Implementation of these fire safety standards would occur during the building permit process and is consistent with GPU mitigation measures Haz-4.2 and Haz-4.3. In addition, the Project is consistent with the Zoning Ordinance and the County of San Diego 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 within the GPU EIR within Section 2.7, Hazards and Hazardous Materials and was determined to be significant and unavoidable. However, the proposed Project would have a less-than-significant impact for the reasons detailed above. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

19(c) The GPU EIR concluded this impact to be significant and unavoidable. The Project would require the minor renovation and expansion of a private driveway. 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 within the GPU EIR because it would not increase impacts identified within the GPU EIR.

19(d) The GPU EIR concluded this impact to be significant and unavoidable. As previously stated in 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 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. Based on review of the Project by County Staff Hydrogeologist and the topography of the site, potential hazards associated with landslides are less than significant. In addition, a soils compaction report with proposed foundation recommendation would be required to be approved prior to the issuance of a building permit. Therefore, for the reasons stated above, the project site would not expose people or structures to significant risk, including downslopes or downstream flooding or landslides, as a result of runoff, post-fire instability, or drainage changes.

The GPU EIR concluded significant and unavoidable impacts associated with Wildfire under Section 2.7, Hazards and Hazardous Materials. However, the proposed Project would have a less-than-significant impact with for the reasons detailed above. Therefore, the Project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR

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

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-4.2 and 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.

Appendices

Appendix A – References

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

Appendix A

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

BWE, Inc., (March 2021), Preliminary Drainage Study, one each for Buildings D and G

Joseph C. Truxaw & Associates, (February 26, 2021), Preliminary Drainage Study for Building F

BWE, Inc., (March 11, 2021), Stormwater Quality Management Plan for Priority Development Projects, one each for Buildings D and G

Joseph C. Truxaw & Associates, (March 10, 2021), Stormwater Quality Management Plan for Priority Development Projects for Building F

Helix Environmental Planning, (March 2021), Air Quality Technical Report

Helix Environmental Planning, (March 2021), Greenhouse Gas Emissions Technical Report

Mizuta, Mark; Mizuta Traffic Consulting, (January 2021), Parking Demand Study

Mizuta, Mark; Mizuta Traffic Consulting, (January 2021), Spring Valley Shopping Center Local Mobility Analysis

Salem Engineering Group, Inc., (April 15, 2020), Phase 1 Environmental Site Assessment

Terry, Charles and Runyan, Jason; Helix Environmental Planning, (January 11, 2021), Noise Analysis

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:

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

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