



County of San Diego

VINCE NICOLETTI
INTERIM DIRECTOR

PLANNING & DEVELOPMENT SERVICES
5510 OVERLAND AVENUE, SUITE 210, SAN DIEGO, CA 92123
(858) 505-6445 General • (858) 694-2705 Code Compliance
(858) 565-5920 Building Services

January 2, 2025

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

Project Name: Ocean Breeze Ranch Modified Project
Project Record Numbers: PDS2023-TM-5615TER, PDS2024-MUP-16-012W1, PDS2024-STP-16-032W1
Environmental Log Number: PDS2014-ER-16-02-006B

APN(s): 124-150-28, 124-150-34, 124-150-35, 125-080-21, 125-131-48, 125-131-49, 125-131-54, 126-060-78, 127-191-20, 127-230-59, 127-271-01, 127-271-02

Lead Agency Name and Address:

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

County Staff Contact:

Greg Mattson, AICP, Contract Project Manager: (619) 895-7177
gmattson@sdcounty.ca.gov

Project Location:

The Ocean Breeze Ranch Modified Project (Modified Project) is located at 5820 West Lilac Road, in the Bonsall and Fallbrook Community Plan areas within unincorporated northern San Diego County. The Modified Project site spans across 1,402.52 acres and is located just south of State Route (SR-) 76 and the San Luis Rey River. Interstate (I-) 15 is located approximately 0.3 mile east of the Modified Project site. Primary access to the site is provided by West Lilac Road. Figure 1 shows the regional location, Figure 2 shows the project location on an aerial photograph, and Figure 3 shows the project location on a USGS map. The site is depicted within Sections 13, 14, 15, 20, 21, 22, and 23 of Township 10 South, Range 3 West of the *Bonsall, California* U.S. Geological Survey (USGS) 7.5-minute topographic quadrangle map.

Project Applicant Name and Address:

Ocean Breeze Ranch LLC
1550 South Coast Highway, Suite 201
Laguna Beach, CA 92651

General Plan

Community Plan: Bonsall Community Plan
Regional Categories: Village, Semi-Rural, Rural, No Jurisdiction
Land Use Designations: Village Residential (VR-4.3), Semi-Rural Residential (SR-4), Semi-Rural Residential (SR-10), Rural Lands (RL-20), and Rural Lands (RL-40)
Density: VR-4.3, SR-4, SR-10, RL-20, RL-40
Floor Area Ratio (FAR) N/A

Zoning

Use Regulation: Variable Family Residential (RV), Limited Agriculture (A70), and Open Space (S80)
Minimum Lot Size: 1 du per 6,000 Square Feet, 1 du per 2 Acres, 1 du per 4 Acres, 1 du per 8 acres
Special Area Regulation: Community Design Review (B), Flood Plain (F), Airport (C)

Previous Project Approval

In December 2019, the County of San Diego Planning Commission approved the Ocean Breeze Ranch project (previously approved project). The previously approved project included two components – a planned residential development and a private equestrian facility on a 1,402.52-acre site. The planned residential development included 396 residential lots divided into three planning areas (PA1, PA2, and PA3). The planned residential development also included parks, roads, and landscaped areas. The existing equestrian facility consisting primarily of previously constructed buildings and structures would remain active within the site. However, no improvements were proposed to the equestrian facility. A 15183 Checklist Pursuant to CEQA Guidelines §15183 was prepared for the previously approved project and is included as an appendix to this document.

Description of Project:

The Modified Project is a Revised Map Time Extension for the previously approved project (Tentative Map 5615). The applicant (Ocean Breeze Ranch, LLC.) requests a time extension and revisions to the previously approved project's grading design in order to avoid extensive import or export of soil in addition to other changes.

The Modified Project includes revisions to the previously approved project, which include changes to 86 lot lines (i.e., 57 residential lots, 25 open space lots, 2 public park lots, and 2 private park lots); lowered building pad elevations in PA1 and PA3 and raised building pad elevations in PA2; revised utility alignments; an additional lot line to split the 100-acre subarea off of the 308.9-acre eastern hills excess biological open space; realigning Street B and associated surface improvements and utilities; adding drainage basins; revising West Lilac Road to provide a dual left turn lane and eastbound bike lane; an additional borrow site in PA3; construction of an equestrian Major Use Permit (MUP) emergency fire access per PDS2016-MUP-16-012; and addition of off-site traffic mitigation.

Under the Modified Project, the applicant is proposing to increase the grading quantities from the previously approved project amount of 1,900,000 cubic yards to 2,500,000 cubic yards, resulting in an increase in fill quantity when compared to the previously approved project of 600,000 cubic yards. This is primarily due to the lowered building pad elevations in PA1 and PA3 and raised building pad elevations in PA2. The additional volume of fill would be generated by increasing the amount of earthwork in PA1 and modifications to PA3. The elevations designed for house pads would be lowered, resulting in greater soil available for fills in PA 2. Pad elevations in PA 1 have been reduced across a range of dimensions, ranging from 2 feet as the smallest change, to 6 feet as the largest change. These changes in pad elevations generally retain the street and lot layout approved under the previously approved project, with

modest shifts to street alignment and lot lines. The Modified Project also includes changes to the number of previously approved architectural floor plans; from 6 to 17 floor plans.

As with the previously approved project, Modified Project access to PA1 and PA2 would be provided off West Lilac Road (a public road) and access to PA3 would be provided off Dulin Road (a private road). The Modified Project will be serviced by the North County Fire Department and the Bonsall Unified School District. Potable water and sewer would be provided by the Rainbow Municipal Water District. PA3 and the as-built equestrian center would be served by on-site wastewater treatment systems.

Discretionary Actions

The Project would require revision to the Tentative Map and a Major Use Permit Modification.

15183 Additional Analysis for the Modified Project

In December 2019 a 15183 Checklist was approved by the County of San Diego Planning Commission for the previously approved project, Ocean Breeze Ranch. Since that time a Revised Tentative Map was submitted to include changes to the previously approved project. Additional analysis provided in this 15183 Checklist is to address the changes in the project since the 2019 approval and to determine if any additional environmental impacts would occur from these changes beyond those analyzed in 2019 and in the County General Plan Program Environmental Impact Report (EIR). This 15183 Checklist only focuses on the changes to the previously approved project. The previously approved project 15183 Checklist is included as Appendix A to this Checklist. Additional technical studies were prepared for the Modified Project to provide evidence that the changes to the previously approved project do not result in any new or more severe impacts (i.e., peculiar impacts) than disclosed in the 2019 15183 Checklist or the General Plan EIR.

Overview of 15183 Checklist

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

General Plan Update Program EIR

The County of San Diego General Plan Update (GPU) establishes a blueprint for future land development in the unincorporated County that meets community desires and balances the environmental protection goals with the need for housing, agriculture, infrastructure, and economic vitality. The GPU applies to all of the unincorporated portions of San Diego County and directs population growth and plans for infrastructure needs, development, and resource protection. The GPU included adoption of new General Plan elements, which set the goals and policies that guide future development. It also included a corresponding land use map, a County Road Network map, updates to Community and Subregional Plans, an Implementation Plan, and other implementing policies and ordinances. The GPU focuses

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

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

Summary of Findings

A 15183 Exemption Checklist was prepared for the previously approved project in December 2019 (2019 15183 Checklist, Appendix A). The Modified Project would not result in any new or more severe significant impacts (i.e., peculiar impacts) than identified in the previously approved project or the General Plan EIR. Further, the GPU EIR adequately anticipated and described the impacts of the Modified Project, identified applicable mitigation measures necessary to reduce project-specific impacts, and the Modified Project implements these mitigation measures (see [http://www.sdcounty.ca.gov/PDS/gpupdate/docs/BOS_Aug2011/EIR/FEIR_7.00 -
_Mitigation_Measures_2011.pdf](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 Modified Project as documented in the §15183 Exemption Checklist. This evaluation concludes that the Modified Project qualifies for an exemption from additional environmental review because it is consistent with the development density and use characteristics established by the County of San Diego General Plan, as analyzed by the San Diego County General Plan Update Final EIR (GPU EIR, ER #02-ZA-001, SCH #2002111067), and all required findings can be made.

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

- 1. The project is consistent with the development density established by existing zoning, community plan or general plan policies for which an EIR was certified.**
The Modified Project is a Revised Tentative Map and Major Use Permit Modification. The Modified Project would not change the zoning of the Project site or the approved density. The Modified Project is consistent with the density of the General Plan and Zoning Ordinance.
- 2. There are no project-specific effects which are peculiar to the project or its site, and which the GPU EIR failed to analyze as significant effects.**
The subject property is no different than other properties in the surrounding area, and there are no Project-specific effects which are peculiar to the Modified Project or its site. The Project site is located in an area developed with similarly sized, estate residential lots with associated accessory uses.

In addition, as explained further in the Modified Project 15183 Exemption Checklist below, all project impacts were adequately analyzed by the GPU EIR. The Modified Project could result in potentially significant impacts to, Air Quality, Biological Resources, Cultural Resources, Greenhouse Gas Emissions, and, Noise. However, applicable mitigation measures specified

within the GPU EIR have been made conditions of approval for Modified Project. All mitigation and conditions of approval still applicable to the previously approved project will also be required for the Modified Project.

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

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

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

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

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

As explained in the 15183 Exemption Checklist below, the applicant for the Modified Project would undertake feasible mitigation measures specified in the GPU EIR. These mitigation measures would be undertaken through project design, compliance with regulations and ordinances, or through the project's conditions of approval. All mitigation measures and conditions of approval still applicable to the previously approved project will also be required for the Modified Project.

_____ Signature	_____ January 2, 2025 Date
_____ Greg Mattson, AICP Printed Name	_____ Contract Project Manager Title

CEQA Guidelines §15183 Exemption Checklist

Overview

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

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

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

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

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

Discussion

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

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

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

The Project site is located at 5820 West Lilac Road, within the Bonsall and Fallbrook Communities of the unincorporated County of San Diego. The Project site spans across 1,402.52 acres and is located just south of SR-76 and the San Luis Rey River. The I-15 is located approximately 0.3 mile east of the Project site. Both the SR-76 and the I-15 are County designated scenic highways (see response I[b]). The Modified Project is a revision and time extension for previously approved project Tentative Map PDS2016-TM-5615. The revision includes 2,500,000 cubic yards of balanced grading, whereas the original approval included 1,900,000 cubic yards (600 cubic yard increase) as well as changes to 86 lot lines; lowered building pad elevations in PA1 and PA3 and raised building pad elevations in PA2; revised utility alignments; an additional lot line to split the 100-acre subarea off of the 308.9-acre eastern hills excess biological open space; realigning Street B and associated surface improvements and utilities; adding drainage basins; revising West Lilac Road to provide a dual left turn lane and eastbound bike lane; an additional borrow site in PA3; construction of an equestrian MUP emergency fire access per PDS2016-MUP-16-012; and addition of off-site traffic mitigation.

The 2019 15183 Checklist determined that the previously approved project would not detract from any views of the identified Resource Conservation Areas (RCAs) and would not be expected to diminish any viewsheds from the RCAs (Appendix A). Similar, because of the distance and intervening topography, viewsheds from the San Marcos Mountains and Gopher Canyon would not be impacted by the Modified Project. Further, there are no identified County trails on the scenic portion of Lancaster Mountain. The Lancaster Creek trail crosses along the lower elevation of the mountain but would not afford views of the Project site.

As previously discussed, the GPU EIR determined impacts on scenic vistas to be less than significant with mitigation. Consistent with the previously approved project, due to distance, intervening topography and the elevation of the Project site, the Modified Project would not detract from any views of the known RCAs and viewsheds from the San Marcos Mountains and Gopher Canyon would not be impacted by the Modified Project. All

additional grading will remain within the Modified Project footprint and would be consistent with the analysis within the GPU EIR because it would not create new impacts, increase impacts, and there is no new information of substantial importance than identified within the GPU EIR.

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

The 2019 15183 Checklist determined that no direct views of the Project site are available from South Mission Road, Camino Del Rey, or Gird Road due to constraining intervening topography, structures, and landscaping and the majority of the views of the site are obscured or inconsequential.

The Modified Project is a revision and time extension for Tentative Map, PDS2016-TM-5615. The revision includes 2,500,000 cubic yards of balanced grading, whereas the original approval included 1,900,000 cubic yards as well as changes to 86 lot lines; lowered building pad elevations in PA1 and PA3 and raised building pad elevations in PA2; revised utility alignments; an additional lot line to split the 100-acre subarea off of the 308.9-acre eastern hills excess biological open space; realigning Street B and associated surface improvements and utilities; adding drainage basins; revising West Lilac Road to provide a dual left turn lane and eastbound bike lane; an additional borrow site in PA3; construction of an equestrian MUP emergency fire access per PDS2016-MUP-16-012; and addition of off-site traffic mitigation. All grading would remain within the previously approved project footprint and would not substantially change the visual character consistent with the previously approved project.

Lastly, no identified visual resources such as unique topographic features have been identified on-site. It is noted that rock outcroppings on-site would generally be retained in the approximately 61 percent of site acreage within the Biological Open Space easement. Historic resources have also been identified on-site as a cluster of 5 structures in conjunction with the equestrian use but would be preserved in perpetuity.

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

- 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 2019 15183 Checklist determined that the previously approved project within the landscape would not detract from or contract with the existing visual character and/or quality of the surrounding area. The Modified Project revision includes 2,500,000 cubic yards of balanced grading, whereas the original approval included 1,900,000 cubic yards as well as changes to 86 lot lines; lowered building pad elevations in PA1 and PA3 and raised building pad elevations in PA2; revised utility alignments; an additional lot line to split the 100-acre subarea off of the 308.9-acre eastern hills excess biological open space; realigning Street B and associated surface improvements and utilities; adding drainage basins; revising West Lilac Road to provide a dual left turn lane and eastbound bike lane; an additional borrow site in PA3; construction of an equestrian MUP emergency fire access per PDS2016-MUP-16-012; and addition of off-site traffic mitigation. All grading would remain within the previously approved project footprint. Consistent with the previously approved project, the Modified Project would not substantially degrade the existing visual character or quality of the site and its surroundings.

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

- 1(d) The GPU EIR concluded new source of substantial light or glare, which would adversely affect day or nighttime views in the area to be significant and unavoidable. The 2019 15183 Checklist determined that the previously approved project would not adversely affect nighttime views or astronomical observations because the project would be required to conform to the Light Pollution Code (Section 51.20151.209). The Modified Project includes 2,500,000 cubic yards of balanced grading, whereas the original approval included 1,900,000 cubic yards as well as changes to 86 lot lines; lowered building pad elevations in PA1 and PA3 and raised building pad elevations in PA2; revised utility alignments; an additional lot line to split the 100-acre subarea off of the 308.9-acre eastern hills excess biological open space; realigning Street B and associated surface improvements and utilities; adding drainage basins; revising West Lilac Road to provide a dual left turn lane and eastbound bike lane; an additional borrow site in PA3; construction of an equestrian MUP emergency fire access per PDS2016-MUP-16-012; and addition of off-site traffic mitigation. All grading would remain within the previously approved project footprint. Consistent with the previously approved project, the Modified Project would not create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area.

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

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.

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

2. Agriculture/Forestry Resources

– Would the project:

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

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

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

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

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

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

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

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

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

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

Discussion

2(a) The GPU EIR concluded this impact to be significant and unavoidable. The 2019 15183 Checklist determined that the previously approved project would impact 244 acres of direct on and off-site agricultural resources and would be required to mitigation at a 1:1 ratio pursuant to the County of San Diego Guidelines for Determining Significance for Agricultural Resources. To ensure the agricultural resources would remain viable for future use, the dedication of an offsite agricultural easement would be required as a condition of the project. The Modified Project revision includes 2,500,000 cubic yards of balanced grading, whereas the original approval included 1,900,000 cubic yards as well as changes to 86 lot lines; lowered building pad elevations in PA1 and PA3 and raised building pad elevations in PA2; revised utility alignments; an additional lot line to split the 100-acre subarea off of the 308.9-acre eastern hills excess biological open space; realigning Street B and associated surface improvements and utilities; adding drainage basins; revising West Lilac Road to provide a dual left turn lane and eastbound bike lane;

an additional borrow site in PA3; construction of an equestrian MUP emergency fire access per PDS2016-MUP-16-012; and addition of off-site traffic mitigation. All grading would remain within the previously approved project footprint and no new impacts to agricultural resources would occur. Therefore, consistent with the previously approved project, the Modified Project shall require agricultural preservation, which is consistent with General Plan mitigation measure Ag-1.4. In addition, as part of the original approval, in order to reduce any interface conflicts with an off-site agricultural resource, design considerations, including compatibility buffers, fencing, and land use transitions have been incorporated from the Guidelines for Determining Significance for Agricultural Resources. The design considerations would continue to apply to the Modified Project.

As previously discussed, the GPU EIR determined impacts from direct and indirect conversion of agricultural resources to be significant and unavoidable. However, the Modified Project would have a less-than-significant indirect impact and would incorporate the GPU EIR mitigation measure Agr-1.4 for a less-than-significant direct impact with mitigation. Therefore, the Modified Project would be consistent with the analysis provided within the GPU EIR.

- 2(b) The GPU EIR concluded this impact to be less than significant with mitigation. The 2019 15183 Checklist determined that no associated interface conflicts or impacts are anticipated from implementation of the previously approved project due to intervening distances, as well as the type of crop. The Modified Project includes 2,500,000 cubic yards of balanced grading, whereas the original approval included 1,900,000 cubic yards as well as changes to 86 lot lines; lowered building pad elevations in PA1 and PA3 and raised building pad elevations in PA2; revised utility alignments; an additional lot line to split the 100-acre subarea off of the 308.9-acre eastern hills excess biological open space; realigning Street B and associated surface improvements and utilities; adding drainage basins; revising West Lilac Road to provide a dual left turn lane and eastbound bike lane; an additional borrow site in PA3; construction of an equestrian MUP emergency fire access per PDS2016-MUP-16-012; and addition of off-site traffic mitigation. All grading would remain within the previously approved project footprint. Therefore, no new impacts would occur.

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

- 2(c) The 2019 15183 Checklist determined that the site, including any offsite improvements, does not contain any forest lands as defined in Public Resources Code section 12220(g). The Modified Project is a revision and time extension for Tentative Map, PDS2016-TM-5615. The revision includes 2,500,000 cubic yards of balanced grading, whereas the original approval included 1,900,000 cubic yards as well as changes to 86 lot lines; lowered building pad elevations in PA1 and PA3 and raised building pad elevations in PA2; revised utility alignments; an additional lot line to split the 100-acre subarea off of the 308.9-acre eastern hills excess biological open space; realigning Street B and associated surface improvements and utilities; adding drainage basins; revising West Lilac Road to provide a dual left turn lane and eastbound bike lane; an additional borrow site in PA3; construction of an equestrian MUP emergency fire access per PDS2016-MUP-16-012; and addition of off-site traffic mitigation. All grading would remain within the previously approved project footprint. Therefore, no new impacts would occur.

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 Modified Project would have a less-than-significant impact to forest resources. Therefore, the Modified Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 2(d) The GPU EIR concluded this impact to be significant and unavoidable. As indicated in response 2(c), all grading would remain within the previously approved project footprint which is not located near any forest lands. Therefore, the Modified Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.
- 2(e) The GPU EIR concluded this impact to be significant and unavoidable. The 2019 15183 Checklist determined that no agricultural operations are currently taking place on the Project site and no impacts would occur in association with interface conflicts due to Project design features. The Modified Project includes 2,500,000 cubic yards of balanced grading, whereas the original approval included 1,900,000 cubic yards as well as changes to 86 lot lines; lowered building pad elevations in PA1 and PA3 and raised building pad elevations in PA2; revised utility alignments; an additional lot line to split the 100-acre subarea off of the 308.9-acre eastern hills excess biological open space; realigning Street B and associated surface improvements and utilities; adding drainage basins; revising West Lilac Road to provide a dual left turn lane and eastbound bike lane; an additional borrow site in PA3; construction of an equestrian MUP emergency fire access per PDS2016-MUP-16-012; and addition of off-site traffic mitigation. All grading would remain within the previously approved project footprint. Therefore, no new impacts would occur. As previously discussed, the GPU EIR determined impacts from direct and indirect conversion of agricultural resources (including forest resources) to be significant and unavoidable. The Modified Project also determined impacts to agricultural resources to be potentially significant. However, the Modified Project would have a less-than-significant indirect impact and would incorporate the GPU EIR mitigation measure Agr1.4 for a less-than-significant direct impact with mitigation. In addition, the Modified Project would have a less than significant impact from land-use conflicts. Therefore, the Modified 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. Feasible mitigation measures contained within the GPU EIR (Agr-1.4) would be applied to the Project. The original approval requires the project applicant provide 244 acres of mitigation to address identified direct impacts to on- and off-site agricultural resources from the proposed development, as fully detailed above.

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

Discussion

An Air Quality and Greenhouse Gas Addendum Letter was prepared for the Modified Project by Ldn Consulting, Inc. on February 10, 2024.

3(a) The GPU EIR concluded this impact to be less than significant. The RAQS and SIP are based on General Plans within the region and the development assumptions contained within them. The Modified Project would not change the density or intensity that is allowed in the General Plan. The development of 396 residential lots and equestrian facility remains the same. The density allowed on the Project site per the County General Plan and the Zoning Ordinance is 402 units. Consistent with the previously approved project, the Modified Project is consistent with the density allowed under the General Plan and 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.

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

3(b) The GPU EIR concluded this impact to be significant and unavoidable. The 2019 15183 Checklist determined that the previously approved project would have less than significant impact related to construction and operational emissions. The Modified Project includes 2,500,000 cubic yards of balanced grading, whereas the original approval included 1,900,000 cubic yards as well as changes to 86 lot lines; lowered building pad elevations in PA1 and PA3 and raised building pad elevations in PA2; revised utility alignments; an additional lot line to split the 100-acre subarea off of the 308.9-acre eastern hills excess biological open space; realigning Street B and associated surface improvements and utilities; adding drainage basins; revising West Lilac Road to provide a dual left turn lane and eastbound bike lane; an additional borrow site in PA3; construction of an equestrian MUP emergency fire access per PDS2016-MUP-16-012; and addition of off-site traffic mitigation. All grading would remain within the previously approved project footprint. An Air Quality and Greenhouse Gas Addendum Letter was prepared to compare the construction emissions estimated for the previously approved project in the original air quality and greenhouse gas studies to the estimated construction emissions for the Modified Project, which includes 600 cubic yards of additional earthwork onsite for a new total of 2,500,000 cubic yards of earthwork. Operationally, the Modified Project and the previously approved project would be identical.

The previously approved project construction dates were estimated based on a construction kickoff in 2022 with construction ending sometime late 2029. The Air Quality and Greenhouse Gas Addendum Letter updated the construction dates in the model to start in 2025 and end in 2032. With the exception of Modified Project grading changes and the updated construction dates, the Modified Project description is essentially the same as was previously approved.

Table 1 below shows the maximum daily air quality emissions reported in the previously approved project analysis using CalEEMod 2016.3.2 for both the winter and summer months and then selects the yearly maximum emission to use as a comparison with blasting. The table also identifies the change in emissions due to the shift in construction start dates by three years and compares the results with the maximum yearly emission of the Modified Project with 2,500,000 cubic yards of material (increase of 600 cubic yards). Based on these results, construction emissions would only marginally increase and would remain less than significant. Finally, since the County now recommends CalEEMod 2022.1 as the primary air quality for CEQA analysis, a model was prepared which compares both the previously approved project with the Modified Project with the increased grading quantities. Table 1 also shows the maximum yearly emissions from each scenario. Based on these findings, the new default emission rates used by CalEEMod 2022.1 are different but demonstrate that the estimated construction emissions would be very similar to what was previously approved.

Table 1: Construction Emissions Summary Various Models (Pounds per Day)

Model and Scenario	ROG	NOx	CO	SO2	PM10 (total)	PM25 (Total)
2016.3.3 Original Analysis	13.08	96.39	86.20	0.24	37.27	12.23
2016.3.2 Original Analysis (Summer Maximum)	13.99	85.42	87.34	0.23	37.28	12.23
Blasting Emissions		102	402		20.59	
2016.3.2 Original Construction – Yearly Maximum with blasting	13.99	198.39	489.34	0.24	57.87	12.22
2016.3.2 Revised Construction Dates – Yearly Maximum with blasting	12.41	207.25	489.39	0.23	57.85	12.28

2016.3.2 Modified Project Increase over Previously Approved Project	-1.58	8.86	0.05	-0.01	-0.02	0.06
2022.1 Revised Construction Dates and Original Earthwork Yearly Maximum with Blasting	4.37	190.9	486.7	0.27	53.89	14.8
2022.1 Revised Construction Dates and Revised Earthwork Yearly Maximum with Blasting	4.62	208	493	0.35	57.49	16
2022.1 Modified Project Increase over Previously Approved Project	0.25	17.1	6.3	0.08	3.6	1.2
Significance Threshold (lb/day)	75	250	550	250	100	55
Significant Impact?	No	No	No	No	No	No

As shown in Table 1, construction emissions under the Modified Project would only marginally increase when compared to the previously approved project and would remain below the significance thresholds. Therefore, impacts related to Modified Project construction emissions would remain less than significant.

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

- 3(c) The 2019 15183 Checklist determined that previously approved project would not exceed the screening thresholds for particulate pollution (PM₁₀), nitrogen oxide gases (NO_x), and volatile organic compounds (VOCs) emissions from construction/grading activities. The Modified Project includes 2,500,000 cubic yards of balanced grading, whereas the original approval included 1,900,000 cubic yards as well as changes to 86 lot lines; lowered building pad elevations in PA1 and PA3 and raised building pad elevations in PA2; revised utility alignments; an additional lot line to split the 100-acre subarea off of the 308.9-acre eastern hills excess biological open space; realigning Street B and associated surface improvements and utilities; adding drainage basins; revising West Lilac Road to provide a dual left turn lane and eastbound bike lane; an additional borrow site in PA3; construction of an equestrian MUP emergency fire access per PDS2016-MUP-16-012; and addition of off-site traffic mitigation. All grading would remain within the previously approved project footprint. According to the Air Quality and Greenhouse Gas Addendum Letter prepared in February 2024, the Modified Project would contribute to particulate pollution (PM₁₀), nitrogen oxide gases (NO_x), and volatile organic compounds (VOCs) emissions from construction/grading activities; however, the incremental increase would not exceed established screening thresholds (see response 3[b] above).

As previously discussed, the GPU EIR determined significant and unavoidable impacts to non-attainment criteria pollutants. However, consistent with the previously approved project, the Modified Project would have a less than significant impact to non-attainment criteria pollutants with the incorporation of conditions. Therefore, the Modified 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 2019 15183 Checklist determine that the previously approved project, is not located within a quarter mile of any identified point source of significant emissions nor did it propose uses or activities that would result in exposure of these sensitive receptors to significant pollutant concentrations and would not place sensitive receptors near any CO hotspots. The Modified Project would be located on the same Project site as the previously approved project. The Modified Project changes would also not propose uses or activities that would result in exposure of sensitive receptors to significant pollutant concentrations.

According to the Air Quality and Greenhouse Gas Addendum Letter prepared in February 2024, construction emissions which produce diesel particulate matter (DPM) could have the potential to increase health risks for nearby receptors. The nearest sensitive receptors are between 140 and 300 meters away from the Modified Project grading boundaries and include the nearby school and residences to the south of the Project site. In addition, the project design features which are a condition of the Modified Project, mandate the use of at least Tier 3 construction equipment with diesel particulate filters (DPF). The original approved analysis found that cancer risks related to DPM would be 4.61 per one million exposed which is less than significant. Since the expected emissions as demonstrated in Table 1 above do not significantly increase, no significant increase to the estimate of health risk would be expected. Furthermore, non-cancer (acute) risks would remain less than significant.

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

- 3(e) The GPU EIR concluded this impact to be less than significant. The 2019 15183 Checklist determined that the existing equestrian activities would generate equestrian odors and would be required to prepare a Vector Control Plan and a Manure Management Plan. In addition, the previously approved project could also produce trace amounts of objectionable odors during construction and operation of the residential components. The Modified Project includes 2,500,000 cubic yards of balanced grading, whereas the original approval included 1,900,000 cubic yards as well as changes to 86 lot lines; lowered building pad elevations in PA1 and PA3 and raised building pad elevations in PA2; revised utility alignments; an additional lot line to split the 100-acre subarea off of the 308.9-acre eastern hills excess biological open space; realigning Street B and associated surface improvements and utilities; adding drainage basins; revising West Lilac Road to provide a dual left turn lane and eastbound bike lane; an additional borrow site in PA3; construction of an equestrian MUP emergency fire access per PDS2016-MUP-16-012; and addition of off-site traffic mitigation. All grading would remain within the previously approved project footprint. Operationally, the Modified Project and the previously approved project would be identical. Therefore, the Modified 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. Consistent with the previously approved project, the Modified Project would have a less than significant impact for the reasons detailed above, the Modified Project would be consistent with the analysis within the GPU EIR because it would not

create new impacts, increase impacts, and there is no new information of substantial importance than identified within the GPU EIR.

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.

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

4. Biological Resources – Would the project:

a) Have a substantial adverse effect, either directly or through habitat modifications, on any candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

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

b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?

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

c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

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

d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

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

e) Conflict with the provisions of any adopted Habitat Conservation Plan, Natural Communities Conservation Plan, other approved local, regional or state habitat conservation plan or any other local policies or ordinances that protect biological resources?

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

Discussion

A Biological Resources Updated Impacts and Mitigation Summary Memo was prepared for the Modified Project by Heliz Environmental Planning in January 2024.

- 4(a) The GPU EIR concluded this impact to be significant and unavoidable. The 2019 15183 Checklist determined that the previously approved project would result in impact to sensitive habitat and/or species which would require mitigation. The Modified Project includes 2,500,000 cubic yards of balanced grading, whereas the original approval included 1,900,000 cubic yards as well as changes to 86 lot lines; lowered building pad elevations in PA1 and PA3 and raised building pad elevations in PA2; revised utility alignments; an additional lot line to split the 100-acre subarea off of the 308.9-acre eastern hills excess biological open space; realigning Street B and associated surface improvements and utilities; adding drainage basins; revising West Lilac Road to provide a dual left turn lane and eastbound bike lane; an additional borrow site in PA3; construction of an equestrian MUP emergency fire access per PDS2016-MUP-16-012; and addition of off-site traffic mitigation. All grading will remain within the previously approved project footprint.

According to the Biological Resources Updated Impacts and Mitigation Summary Memo, the Modified Project would result in impacts to southern willow scrub, mule fat scrub, tamarisk scrub, coast live oak woodland, Diegan coastal sage scrub, flat-topped buckwheat scrub, non-native grassland and pasture.

Four special status plant species were observed on the Project site, which include Brewer's Calandrinia (*Calandrinia breweri*), Delicate Clarkia (*Clarkia delicata*), Graceful Tarplant (*Holocarpha virgata ssp. elongata*), and Smooth Tarplant (*Centromadia pungens ssp. laevis*). Apart from the species observed on site, no additional special status plant species were considered to have high potential to occur based on results of focused surveys and analysis of species with potential to occur in the region. No impacts would occur to County List A or B plant species. The Modified Project would result in impacts to one County List D species: graceful tarplant. No other County Group C or D plant species would be impacted by the Modified Project. Twenty-seven special status animal species have been observed or detected on or directly adjacent to the Project site or flying over the site. The Modified Project would result in impacts to suitable breeding or foraging habitat for 21 special status animal species observed or detected on or adjacent to the site, including coastal California gnatcatcher, least Bell's vireo, northern harrier, southern California rufous-crowned sparrow, Cooper's hawk, California horned lark, red-shouldered hawk, vermilion flycatcher, western bluebird, white-tailed kite, loggerhead shrike, white-faced ibis, turkey vulture, barn owl, snow goose, Canada goose, great blue heron, western spadefoot, coastal western whiptail, yellow warbler, and northwestern San Diego pocket mouse.

Of the vegetation communities that require mitigation, only three have changes in the impact acreages: Diegan coastal sage scrub, non-native grassland, and extensive agriculture (pasture). As considered by the GPU EIR, Modified Project impacts to sensitive habitat and/or species will be mitigated through implementation of on-site preservation in a biological open space easement. Minor revisions to the site plan have resulted in a 0.5-acre decrease in the size of the on-site biological open space, from 832.7 acres to 832.2 acres. However, the Modified Project's proposed preservation of upland habitats within on-site biological open space still covers the mitigation needed for the 0.3-acre increases

in impacts to both Diegan coastal sage scrub and pasture, as the biological open space contains habitat areas in excess of what is needed for mitigation. The net increase in required mitigation is 0.8 acre within an 832.2-acre area of biological open space, of which only 158.97 acres are needed to meet habitat mitigation requirements. Thus, the mitigation still covers all impacts.

As previously discussed, the GPU EIR determined impacts to special status species as significant and unavoidable. The Modified Project impacts were also determined to be potentially significant. However, consistent with the previously approved project, the Modified Project would incorporate the GPU EIR mitigation measures Bio 1.6 and Bio 1.7 (as well as previously approved project specific mitigation measures BIO-1a through BIO-5n and revised Mitigation Measures BIO-1a, BIO-4a, BIO-4b, BIO-6c, and BIO-6d consistent with the GPU EIR) for a less than significant impact with mitigation. Therefore, consistent with the previously approved project, the Modified Project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR. Therefore, the Modified Project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

The Modified Project revised Mitigation Measures BIO-1a, BIO-4a, BIO-4b, BIO-6c, and BIO-6d include the following:

BIO-1a Mitigation for impacts to 34.2 acres of coastal California gnatcatcher habitat (32.8 acres of Diegan coastal sage scrub and 1.4 acres of flat-topped buckwheat scrub) shall occur at a 3:1 ratio through the on-site preservation of 102.6 acres of Diegan coastal sage scrub within a biological open space easement.

BIO-4a Mitigation for impacts to 37.2 acres of non-native grassland shall occur at a 0.5:1 ratio through the on-site preservation of 18.6 acres of non-native grassland within a biological open space easement. The mitigation shall be provided prior to the issuance of a grading permit.

BIO-4b Mitigation for impacts to 58.8 acres of pasture shall occur at a 0.5:1 ratio through the on-site preservation of 29.4 acres of grassland habitat and/or other like-functioning habitat (e.g., fallow orchard) within a biological open space easement. The mitigation shall be provided prior to the issuance of a grading permit.

BIO-6c Mitigation for 32.8 acres of impacts to Diegan coastal sage scrub and 1.4 acres of impacts to flat-topped buckwheat scrub shall occur at a 3:1 ratio through the on-site preservation of 102.6 acres of Diegan coastal sage scrub within a biological open space easement. The mitigation shall be provided prior to the issuance of a grading permit.

BIO-6d Mitigation for 37.2 acres of impacts to non-native grassland shall occur through implementation of BIO-4a, above. The mitigation shall be provided prior to the issuance of a grading permit.

- 4(b) The GPU EIR concluded this impact to be significant and unavoidable. The 2019 15183 checklist determined that the previously approved project would result in impacts to sensitive natural communities and to jurisdictional wetlands and riparian habitats as defined by the United States Army Corps of Engineers (USACE), California Department of Fish and Wildlife (CDFW), and/or County. Impacts to sensitive habitat and/or species would be mitigated through implementation of on-site preservation in a biological open space easement. The Modified Project includes 2,500,000 cubic yards of balanced

grading, whereas the original approval included 1,900,000 cubic yards as well as changes to 86 lot lines; lowered building pad elevations in PA1 and PA3 and raised building pad elevations in PA2; revised utility alignments; an additional lot line to split the 100-acre subarea off of the 308.9-acre eastern hills excess biological open space; realigning Street B and associated surface improvements and utilities; adding drainage basins; revising West Lilac Road to provide a dual left turn lane and eastbound bike lane; an additional borrow site in PA3; construction of an equestrian MUP emergency fire access per PDS2016-MUP-16-012; and addition of off-site traffic mitigation. All grading will remain within the previously approved project footprint.

Based on the Biological Resources Updated Impacts and Mitigation Summary Memo, the Project site contains southern willow scrub, mule fat scrub, tamarisk scrub, coast live oak woodland, Diegan coastal sage scrub (including disturbed), flat-topped buckwheat scrub, and pasture. While pasture is not considered a sensitive vegetation community, impacts to pasture on the Project site require mitigation because it functions as potential raptor foraging habitat. Of the vegetation communities that require mitigation, only three have changes in the impact acreages: Diegan coastal sage scrub, non-native grassland, and extensive agriculture (pasture).

Minor revisions to the site plan have resulted in a 0.5-acre decrease in the size of the on-site biological open space, from 832.7 acres to 832.2 acres. However, the Modified Project's proposed preservation of upland habitats within on-site biological open space still covers the mitigation needed for the 0.3-acre increases in impacts to both Diegan coastal sage scrub and pasture, as the biological open space contains habitat areas in excess of what is needed for mitigation. The net increase in required mitigation is 0.8 acre within an 832.2-acre area of biological open space, of which only 158.97 acres are needed to meet habitat mitigation requirements. Thus, the mitigation still covers all impacts.

As previously discussed, the GPU EIR determined impacts to special status species as significant and unavoidable. The Modified Project impacts were also determined to be potentially significant. However, the Modified Project would incorporate the GPU EIR mitigation measures Bio 1.6, Bio 1.7, and Bio 2.2 through Bio 2.4 (as well as previously approved project specific mitigation measures BIO-6a through BIO-10b consistent with the GPU EIR and revised Mitigation Measures BIO-1am BIO-4a, BIO-4b, BIO-6c, and BIO-6d) for a less than significant impact with mitigation. Therefore, the Modified 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 significant and unavoidable. The 2019 15183 Checklist determined that the previously approved project would result in impacts to non-wetland waters of the U.S., wetlands and waters under CDFW jurisdiction, County RPO wetlands. The Modified Project is a revision and time extension for Tentative Map, PDS2016-TM-5615. The revision includes 2,500,000 cubic yards of balanced grading, whereas the original approval included 1,900,000 cubic yards as well as changes to 86 lot lines; lowered building pad elevations in PA1 and PA3 and raised building pad elevations in PA2; revised utility alignments; an additional lot line to split the 100-acre subarea off of the 308.9-acre eastern hills excess biological open space; realigning Street B and associated surface improvements and utilities; adding drainage basins; revising West Lilac Road to provide a dual left turn lane and eastbound bike lane; an additional borrow site in PA3; construction of an equestrian MUP emergency fire access per PDS2016-MUP-16-012; and addition of off-site traffic mitigation. All grading will remain within the previously approved project footprint.

Based on the Biological Resources Updated Impacts and Mitigation Summary Memo, the Project site contains southern willow scrub, mule fat scrub, tamarisk scrub, coast live oak woodland, Diegan coastal sage scrub (including disturbed), flat-topped buckwheat scrub, and pasture. While pasture is not considered a sensitive vegetation community, impacts to pasture on the Project site require mitigation because it functions as potential raptor foraging habitat. Of the vegetation communities that require mitigation, only three have changes in the impact acreages due to the proposed Project revisions: Diegan coastal sage scrub, non-native grassland, and extensive agriculture (pasture).

No new impacts to federally protected wetlands would occur. However, the Modified Project would incorporate the GPU EIR mitigation measures Bio 1.6 and Bio 1.7 (as well as previous Project specific mitigation measures BIO-7a through BIO-7c consistent with the GPU EIR) for a less than significant impact with mitigation. Therefore, the Modified 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. The 2019 15183 Checklist determined that the previously approved project could result in impacts to wildlife movement and corridors and impacts to would be mitigated through ordinance compliance and through implementation of mitigation measures Bio 1.6, Bio 1.7, and Bio-2.3. The Modified Project includes 2,500,000 cubic yards of balanced grading, whereas the original approval included 1,900,000 cubic yards as well as changes to 86 lot lines; lowered building pad elevations in PA1 and PA3 and raised building pad elevations in PA2; revised utility alignments; an additional lot line to split the 100-acre subarea off of the 308.9-acre eastern hills excess biological open space; realigning Street B and associated surface improvements and utilities; adding drainage basins; revising West Lilac Road to provide a dual left turn lane and eastbound bike lane; an additional borrow site in PA3; construction of an equestrian MUP emergency fire access per PDS2016-MUP-16-012; and addition of off-site traffic mitigation. All grading will remain within the previously approved project footprint. Therefore, no new impacts would occur.

As previously discussed, the GPU EIR determined impacts to wildlife movement corridors as significant and unavoidable. Consistent with the previously approved project, the Modified Project impacts were also determined to be potentially significant. However, the Modified Project would incorporate the GPU EIR mitigation measures Bio-1.6, Bio-1.7 and Bio-2.3 for a less than significant impact with mitigation. Therefore, the Modified 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 2019 15183 Checklist determined that the previously approved project would comply with local policies and ordinances and impacts would be less than significant. The Modified Project includes 2,500,000 cubic yards of balanced grading, whereas the original approval included 1,900,000 cubic yards as well as changes to 86 lot lines; lowered building pad elevations in PA1 and PA3 and raised building pad elevations in PA2; revised utility alignments; an additional lot line to split the 100-acre subarea off of the 308.9-acre eastern hills excess biological open space; realigning Street B and associated surface improvements and utilities; adding drainage basins; revising West Lilac Road to provide a dual left turn lane and eastbound bike lane; an additional borrow site in PA3; construction of an equestrian

MUP emergency fire access per PDS2016-MUP-16-012; and addition of off-site traffic mitigation. All grading will remain within the previously approved project footprint. Of the vegetation communities that require mitigation, only three have changes in the impact acreages due to the proposed Project revisions: Diegan coastal sage scrub, non-native grassland, and extensive agriculture (pasture). The Modified Project would mitigate coastal sage scrub habitat loss in accordance with Section 4.3 of the Natural Community Conservation Plan (NCCP) Guidelines. The Modified Project would impact a combined total of 32.8 acres of Diegan coastal sage scrub and 1.4 acres of flat-topped buckwheat scrub) that shall be mitigated at a 3:1 ratio through the on-site preservation of 102.6 acres of Diegan coastal sage scrub within a biological open space easement.

As considered by the GPU EIR, future Projects proposed under the GPU would be required to comply with applicable HCPs and NCCPs. Regulatory processes to ensure compliance are already in place. Therefore, a potentially significant impact associated with conflicts with HCPs and NCCPs would not occur. No mitigation measures were identified in the GPU EIR. Consistent with the previously approved project, the Modified Project's impact would be less than significant; therefore, no specific mitigation measures are identified. As previously discussed, the GPU EIR determined impacts on local policies and ordinances as well as HCPs and NCCPs as less than significant. As the Modified Project would have a less-than-significant impact for the reasons detailed above, it 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. Feasible mitigation measures contained within the GPU EIR (Bio-1.6, Bio-1.7, Bio-2.2, Bio-2.3, and Bio-2.4) would be applied to the Project along with revised Mitigation Measures BIO-1am BIO-4a, BIO-4b, BIO-6c, and BIO-6d.

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

5. Cultural Resources – Would the project:

a) Cause a substantial adverse change in the significance of a historical resource as defined in 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Directly or indirectly destroy a unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Directly or indirectly destroy a unique paleontological resource or site?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

Discussion

- 5(a) The GPU EIR concluded this impact to be less than significant with mitigation. Six resources (CA-SDI-20174, CA-SDI-21876, P-37-028134, P-37-028139, P-37-031762, and P-37-035850) were evaluated in the 2019 15183 Checklist. The Modified Project includes 2,500,000 cubic yards of balanced grading, whereas the original approval included 1,900,000 cubic yards as well as changes to 86 lot lines; lowered building pad elevations in PA1 and PA3 and raised building pad elevations in PA2; revised utility alignments; an additional lot line to split the 100-acre subarea off of the 308.9-acre eastern hills excess biological open space; realigning Street B and associated surface improvements and utilities; adding drainage basins; revising West Lilac Road to provide a dual left turn lane and eastbound bike lane; an additional borrow site in PA3; construction of an equestrian MUP emergency fire access per PDS2016-MUP-16-012; and addition of off-site traffic mitigation. All grading will remain within the previously approved project footprint. Therefore, no new impacts would occur.

As considered by the GPU EIR, Project impacts to historical resources would be mitigated through ordinance compliance and through implementation of mitigation measures Cul-1.1, Cul-1.2, and Cul-1.3. Consistent with the previously approved project, specific mitigation measure CULT-1 consistent with mitigation in the GPU EIR would be required for the Modified Project, which includes a Use, Maintenance and Repair Easement over five significant structures of the historic Canfield-Lighton Ranch.

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

- 5(b) The GPU EIR concluded this impact to be less than significant with mitigation. Six resources (CA-SDI-776 Loci A through I, CA-SDI-1083, CA-SDI-8237, CA-SDI-12550, CA-SDI-21874, and CA-SDI-21875) were evaluated as part of the 2019 15183 Checklist for the previously approved project. The Modified Project includes 2,500,000 cubic yards of balanced grading, whereas the original approval included 1,900,000 cubic yards as well as changes to 86 lot lines; lowered building pad elevations in PA1 and PA3 and raised building pad elevations in PA2; revised utility alignments; an additional lot line to split the 100-acre subarea off of the 308.9-acre eastern hills excess biological open space; realigning Street B and associated surface improvements and utilities; adding drainage basins; revising West Lilac Road to provide a dual left turn lane and eastbound bike lane; an additional borrow site in PA3; construction of an equestrian MUP emergency fire access per PDS2016-MUP-16-012; and addition of off-site traffic mitigation. All grading will remain within the previously approved project footprint. Therefore, no new impacts would occur.

As considered by the GPU EIR, consistent with the previously approved project, Modified Project impacts to cultural resources would be mitigated through ordinance compliance and through implementation of GPU mitigation measures Cul-1.1, Cul-1.2, and Cul-1.3. Specific mitigation measures CULT-2 through CULT-6, are consistent with mitigation in the GPU EIR, and include the following: an Archaeological Monitoring Program,

Temporary Fencing, Pre-Grade Survey, Capping Plan, Open Space Dedication, and Dust Control Plan would be required as conditions of the Project.

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

- 5(c) The GPU EIR concluded this impact to be less than significant. Geologic resources were evaluated as part of the previously approved project and no mitigation was required.

The 2019 15183 Checklist determined that 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. The Modified Project includes grading within the previously approved project footprint. Therefore, new impacts would occur.

As previously discussed, the GPU EIR determined impacts on paleontological resources as less than significant with mitigation. Consistent with the previously approved project, the Modified Project determined impacts to paleontological resources as potentially significant. However, the Modified Project would incorporate the GPU EIR mitigation measures Cul-3.1 for a less than significant impact with mitigation. Therefore, the Modified 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. The 2019 15183 Checklist determined proposed excavation has the potential to impact fossil deposits. Mitigation was required as part of the previously approved project and included monitoring by the Project Contractor and conformance with the County's Paleontological Resource Guidelines.

The Modified Project includes 2,500,000 cubic yards of balanced grading, whereas the original approval included 1,900,000 cubic yards as well as changes to 86 lot lines; lowered building pad elevations in PA1 and PA3 and raised building pad elevations in PA2; revised utility alignments; an additional lot line to split the 100-acre subarea off of the 308.9-acre eastern hills excess biological open space; realigning Street B and associated surface improvements and utilities; adding drainage basins; revising West Lilac Road to provide a dual left turn lane and eastbound bike lane; an additional borrow site in PA3; construction of an equestrian MUP emergency fire access per PDS2016-MUP-16-012; and addition of off-site traffic mitigation. All grading will remain within the previously approved project footprint. Consistent with the previously approved project, paleontological grading monitoring by the Project Contractor and conformance with the County's Cultural Resource Guidelines if resources are encountered would be required for the Modified Project. The GPU EIR identified these mitigation measures as Cul-3.1.

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

- 5(e) The GPU EIR concluded this impact to be less than significant with mitigation. The 2019 15183 Checklist determined that the Project site does not include a formal cemetery or

any archaeological resources that might contain interred human remains. The Modified Project would grade within the previously approved project footprint. Similarly, the Modified Project would be required to implement mitigation measures for inadvertent discoveries (Archaeological Monitoring Program) and requirements in the event human remains are identified. See section 5(b).

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

Conclusion

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

1. No peculiar impacts to the project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. Feasible mitigation measures contained within the GPU EIR (Cul-1.1 through Cul-1.3 and Cul-3.1), would be applied to the Project. Those mitigation measures, detailed above, requires the Project applicant to preserve resources in perpetuity, comply with ordinances, the Mills Act, would restrict demolition/removal of resources and require paleontological monitoring during grading.

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? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Discussion

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

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

- 6(a) The 2019 15183 Checklist determined that the previously approved project, would increase the demand for electricity and natural gas at the Project site, and gasoline consumption in the Project site during construction and operation relative to existing conditions. The Modified Project includes 2,500,000 cubic yards of balanced grading, whereas the original approval included 1,900,000 cubic yards as well as changes to 86 lot lines; lowered building pad elevations in PA1 and PA3 and raised building pad elevations in PA2; revised utility alignments; an additional lot line to split the 100-acre subarea off of the 308.9-acre eastern hills excess biological open space; realigning Street B and associated surface improvements and utilities; adding drainage basins; revising West Lilac Road to provide a dual left turn lane and eastbound bike lane; an additional borrow site in PA3; construction of an equestrian MUP emergency fire access per PDS2016-MUP-16-012; and addition of off-site traffic mitigation. All grading would remain within the previously approved project footprint.

CEQA requires mitigation measures to reduce “wasteful, inefficient and unnecessary” energy usages (California Public Resources Code, Section 21100(b)(3)). Neither the law nor the CEQA Guidelines establish criteria that define wasteful, inefficient, or unnecessary use. Compliance with the California Code of Regulations, Title 24, Part 6, Building Code, would result in highly energy-efficient buildings. However, compliance with building codes does not adequately address all potential energy impacts during construction and operation. It can be expected that energy consumption, outside of the Building Code regulations, would occur through the transport of construction materials to and from the site during the construction phase, the use of personal vehicles by residents, and the operation of delivery vehicles to service the new residential units.

Consistent with the previously approved project, grading would rely on petroleum consumption throughout the grading as well as the construction phases of the Modified Project. Fuel consumed by construction equipment would be the primary energy resource expended over the course of grading and construction. Vehicle trips associated with the transportation of construction materials and construction workers commutes would also result in petroleum consumption, but to a lesser extent. The Modified Project would require heavy-duty construction equipment with Tier 3 or better engines to be used during each phase of construction, which would occur over approximately seven years. Petroleum consumption would be necessary for operation and maintenance of construction equipment and would not be beyond what is necessary for construction of the Modified Project. The application of Tier 3 or better engines for all construction equipment would improve the efficiency of the equipment beyond what would be assumed for a standard fleet. The energy needs for the Modified 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. Consistent with the previously approved project, construction equipment use and associated energy consumptions would be typical of that associated with the construction of residential projects of this size in a rural setting. The General Plan allows for the construction of 402 residential units. The Modified Project’s 396 residential units would be comparable, if not less, energy intensive than the construction required for the General Plan buildout. Operationally, energy impacts for the Modified Project would remain similar to the previously approved project.

Consistent with the previously approved project, the Modified Project would be consistent with the General Plan and is anticipated to consume less energy during construction and operation than what would have been assumed for buildout of the site under the General Plan. Due to the aforementioned factors, the Modified Project's energy consumption would not be considered wasteful, inefficient, or unnecessary. Therefore, no new impacts would occur.

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. Consistent with the previously approved project, the Modified Project would not conflict with policies within the GPU related to energy use, nor would it result in the wasteful, inefficient, or unnecessary consumption of energy resources, as specified within Appendix G of the CEQA Guidelines.

6(b) The 2019 15183 Checklist determined that the previously approved project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. The Modified Project includes 2,500,000 cubic yards of balanced grading, whereas the original approval included 1,900,000 cubic yards as well as changes to 86 lot lines; lowered building pad elevations in PA1 and PA3 and raised building pad elevations in PA2; revised utility alignments; an additional lot line to split the 100-acre subarea off of the 308.9-acre eastern hills excess biological open space; realigning Street B and associated surface improvements and utilities; adding drainage basins; revising West Lilac Road to provide a dual left turn lane and eastbound bike lane; an additional borrow site in PA3; construction of an equestrian MUP emergency fire access per PDS2016-MUP-16-012; and addition of off-site traffic mitigation. All grading would remain within the previously approved project footprint. Consistent with the previously approved project, the Modified Project includes the following energy conservation measures:

- Tier 3 or better construction equipment which would reduce fuel consumption associated with construction activities;
- High-efficiency Light Emitting Diode (LED) street and area lighting which would reduce electricity consumption on-site;
- Compliance with the County's Water Conservation in Landscaping Ordinance, demonstrating a 40 percent reduction in outdoor use which would reduce energy required for water conveyance.
- Installation of low-flow indoor water fixtures and at least one energy-efficient appliance in all residential units, reducing water and energy consumption
- Plumb and install a single Level 2 electric vehicle (EV) charging station in each of the 396 residential units, which would reduce petroleum consumption from Project generated traffic; and
- Install 1,973 KW of PV (equivalent to 6,577 300-watt panels or an average of 16.6 panels per home), which would reduce the Project's reliance on electricity generated off-site.

Consistent with the previously approved project, the Modified Project would implement all applicable measures required. The threshold for the previously approved project was Consistency with the 2018 Climate Action Plan (CAP). That plan was subsequently rescinded, and the County is preparing a CAP Update for consideration by the Board of Supervisory Fall of 2024. However, because the Modified Project results in substantially similar GHG impacts, the overall number of residential units is the same, and the same

energy conservation measures would be required, the Modified Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency and no new impacts would occur.

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. Consistent with the previously approved project, the Modified 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.

7. Geology and Soils – Would the project:

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

Discussion

7(a)(i) The GPU EIR concluded this impact to be less than significant. The 2019 15183 Checklist determined that no presence of local active faults cross the specific Project site. The

Modified Project includes 2,500,000 cubic yards of balanced grading, whereas the original approval included 1,900,000 cubic yards as well as changes to 86 lot lines; lowered building pad elevations in PA1 and PA3 and raised building pad elevations in PA2; revised utility alignments; an additional lot line to split the 100-acre subarea off of the 308.9-acre eastern hills excess biological open space; realigning Street B and associated surface improvements and utilities; adding drainage basins; revising West Lilac Road to provide a dual left turn lane and eastbound bike lane; an additional borrow site in PA3; construction of an equestrian MUP emergency fire access per PDS2016-MUP-16-012; and addition of off-site traffic mitigation. All grading will remain within the previously approved project footprint. Therefore, no new impact would occur.

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

7(a)(ii) The GPU EIR concluded this impact to be less than significant. The 2019 15183 Checklist determined that the previously approved project would not result in a significant impact due to compliance with the California Building Code and the County Building Code. The Modified Project includes 2,500,000 cubic yards of balanced grading, whereas the original approval included 1,900,000 cubic yards as well as changes to 86 lot lines; lowered building pad elevations in PA1 and PA3 and raised building pad elevations in PA2; revised utility alignments; an additional lot line to split the 100-acre subarea off of the 308.9-acre eastern hills excess biological open space; realigning Street B and associated surface improvements and utilities; adding drainage basins; revising West Lilac Road to provide a dual left turn lane and eastbound bike lane; an additional borrow site in PA3; construction of an equestrian MUP emergency fire access per PDS2016-MUP-16-012; and addition of off-site traffic mitigation. All grading will remain within the previously approved project footprint. Consistent with the previously approved project, to ensure the structural integrity of all buildings and structures, the Modified Project must conform to the Seismic Requirements as outlined within the California Building Code. In addition, a soils compaction report with proposed foundation recommendation would be required to be approved before the issuance of a building permit. Therefore, consistent with the previously approved project, compliance with the California Building Code and the County Building Code would ensure that the Modified Project would not result in a significant impact. Therefore, no new impacts would occur.

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

7(a)(iii) The GPU EIR concluded this impact to be less than significant. The 2019 15183 Checklist determined that adverse geologic structures that would preclude Project feasibility were not encountered on-site. The Modified Project would include the same number of units and all grading will remain within the previously approved project footprint. Consistent with the previously approved project, the potentially liquefiable and compressible deposits of alluvium would require more investigation in order to develop a program of ground mitigation and/or specialized foundation/infrastructure designs. According to the Evaluation, portions of the Project site are located within a "Potential Liquefaction Area" as identified in the County Guidelines for Determining Significance for Geologic Hazards. Portions of the Project site are underlain with alluvial material. Some alluvial materials are

liquefiable and would display some settlement during an earthquake. Consistent with the previously approved project, to ensure no impacts would occur, a soils compaction report would be required for review and approval by the PDS Director prior to ground disturbance activities associated with the Modified Project. In addition, a Geotechnical Monitor would be required during all grading activities. Therefore, no new impacts would occur.

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

- 7(a)(iv) The GPU EIR concluded this impact to be less than significant. The 2019 15183 Checklist determined that previously approved project was not located in a Landslide Susceptibility Area as identified in the County Guidelines for Determining Significance for Geologic Hazards and no ancient landslides or evidence of past slope instability have been mapped. The Modified Project would include the same number of units and all grading will remain within the previously approved project footprint. Therefore, no new impacts would occur.

As previously discussed, the GPU EIR determined less than significant impacts from exposure to seismic-related hazards and soil stability. As the Modified Project would have a less than significant impact with the incorporation of conditions for a soil's compaction report and geotechnical monitoring, the Modified Project would be consistent with the analysis within the GPU EIR because it would not create new impacts, increase impacts, and there is no new information of substantial importance than identified within the GPU EIR.

- 7(b) The GPU EIR concluded this impact to be less than significant. The 2019 15183 Checklist determined that the previously approved project would not result in substantial soil erosion or the loss of topsoil due to compliance with the Watershed Protection Ordinance (WPO) and Grading Ordinance. The Modified Project includes the same number of units, adds drainage basins, and will grade within the previously approved project footprint. Consistent with the previously approved project, the Modified Project would be required to implement Best Management Practices (BMPs) per the Standard Development Project Storm Water Quality Management Plan (SWQMP) and a Stormwater Pollution Prevention Plan (SWPPP). Please see Section 10, Hydrology and Water Quality, for a detailed discussion. Therefore, no new impacts would occur.

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

- 7(c) The GPU EIR concluded this impact to be less than significant. The 2019 15183 Checklist determined that any planned fill slopes constructed within existing alluvial areas present a potential for lateral spreading to affect the perimeter fill slopes underlain with unmitigated alluvial soils below the groundwater table.

The Modified Project would grade within the previously approved project footprint. Consistent with the previously approved project, a geotechnical consultant in the field shall perform mapping of temporary slope excavations, including front, side and backcuts, and

all cut slopes during grading and blasting. If adverse geologic conditions (e.g., highly fractured and jointed rock, clay-lined fractures, seepage zones) are encountered during installation of cut slopes, stabilization measures shall be required and implemented during grading. Specific stabilization measures shall include, but not be limited to, removal of loose boulders or displaced rocks, stability fill, buttresses, rock-bolting, and/or catchment netting. Therefore, no new impacts would occur.

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

- 7(d) The GPU EIR determined impacts from expansive soils to be less than significant. The 2019 15183 Checklist determined that the previously approved project is not underlain by expansive soils, .

The Modified Project would be located on the same Project site and all grading will remain within the previously approved project footprint. Therefore, no new impacts would occur.

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

- 7(e) The GPU EIR concluded this impact to be less than significant. The 2019 15183 Findings determined that the majority of the Project site would rely on public water and sewer for the disposal of wastewater. and would not place septic tanks or alternative wastewater disposal systems on soils incapable of adequately supporting the tanks or system.

The Modified Project would be located on the same Project site and would rely on the same public water and sewer. Therefore, no new impacts would occur.

As previously discussed, the GPU EIR determined impacts to wastewater disposal systems to be less than significant. As the Modified Project would have a less than significant impact for the reasons detailed above, the project would be consistent with the analysis within the GPU EIR because it would not create new impacts, increase impacts, and there is no new information of substantial importance than 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion

An Air Quality and Greenhouse Gas Addendum Letter was prepared for the Modified Project by Ldn Consulting, Inc. on February 10, 2024.

- 8(a) The GPU EIR concluded this impact to be less than significant with mitigation. The 2019 15183 Checklist determined that impacts from construction and operation emissions would be less than significant.

The Modified Project includes 2,500,000 cubic yards of balanced grading, whereas the original approval included 1,900,000 cubic yards as well as changes to 86 lot lines; lowered building pad elevations in PA1 and PA3 and raised building pad elevations in PA2; revised utility alignments; an additional lot line to split the 100-acre subarea off of the 308.9-acre eastern hills excess biological open space; realigning Street B and associated surface improvements and utilities; adding drainage basins; revising West Lilac Road to provide a dual left turn lane and eastbound bike lane; an additional borrow site in PA3; construction of an equestrian MUP emergency fire access per PDS2016-MUP-16-012; and addition of off-site traffic mitigation. The Air Quality and Greenhouse Gas Addendum Letter compares the construction greenhouse gas (GHG) emissions estimated for the previously approved project to construction emissions estimated for the Modified Project, which includes additional 600,000 cubic yards of earthwork onsite. Operationally, the previously approved project and the Modified Project are identical.

The GHG emissions estimated for the previously approved project was 18,114.87 metric tons (MT) carbon dioxide equivalent (CO₂e) total or 603.83 MT CO₂e annually. The Air Quality and Greenhouse Gas Addendum Letter updated the construction model to include 2,500,000 cubic yards of earthwork under the Modified Project. Based on the air quality and GHG modeling, the Modified Project would increase GHG emissions during first two years of construction when compared to the previously approved project; however, over the remaining construction years, a GHG emissions reduction would be expected when compared to the previously approved project. The cumulative construction emissions would be 17,690.88 MT CO₂e over the entire construction duration or an annual GHG emission of 589.70 MT CO₂e per year, which is a reduction of 14.13 MT CO₂e per year as compared to the previously approved project. Since GHG emissions associated with construction of the Modified Project would decrease cumulatively over the entire

construction duration and would result in a reduction in total GHG emissions as compared to the previously approved project, the Modified Project would generate a less than significant GHG impact. Additionally, the Modified Project would incorporate all of the same project design features to reduce potential impacts associated with GHG emissions as required in the previously approved project, including the following:

- Project-related construction activities would use Tier 3 or better construction equipment with DPF United States (U.S.) Environmental Protection Agency (EPA)/ California Air Resources Board (CARB)-certified construction equipment with DPF. The Project developer has confirmed commitment to this feature.
- The Project would utilize architectural coatings compliant with San Diego Air Pollution Control District (SDAPCD) Rule 67 (SDAPCD, 2015).
- Install high-efficiency Light Emitting Diode (LED) street and area lighting to achieve reduction in overall lighting energy.
- The Project would only install Natural Gas fireplaces within all 396 residential units.
- In accordance with the California Integrated Waste Management Act (AB 939), and to be consistent with AB 341's statewide 75% diversion policy, the Project would seek to also achieve a 75% diversion goal by providing areas for storage and collection of recyclables and provide literature promoting recycling to achieve additional waste diversion.
- The Project applicant would be required to comply with County's Water Conservation in Landscaping Ordinance and demonstrates a 40% reduction in outdoor use and would submit a Landscape Document Package to show such compliance. A 20% reduction was assumed within GHG modeling to be conservative.
- Install low flow indoor water fixtures in all residential units.
- Plumb and install a single Level 2 electric vehicle (EV) charging station in each of the 396 residential units.
- The Project would install 1,973 KW of PV which is equivalent to 6,577 300-watt panels or an average of 16.6 panels per home.
- Landscaped and screened parking areas consistent with the County's Parking Design Manual, including Section 7 (Landscaping) and the "cool parking" mitigation requirements identified by the CARB.
- Provision of short-term bicycle parking racks at several of the park areas within the Project per County requirements.
- Building efficiency features such as High-Efficiency HVAC system, sealed (tight) air ducts that minimize heating and cooling HVAC losses, tankless water heaters and Low E dual pane windows.
- Work with the regional or local water agency to determine if incentives/rebates are available for the purchase and installation of rain barrels.
- Incorporate into Project Covenants, Conditions & Restrictions (CC&Rs) requirements that the Homeowners Association (HOA) coordinate with SANDAG to provide informational materials on rideshare programs such as iCommute San Diego.
- Provide natural gas and electrical outlets in all private rear yards,
- Increase new tree plantings throughout the neighborhood by planting two trees per dwelling unit which is equivalent to a minimum of 792 trees within the Project Site.
- Install weather-based irrigation systems which include rain sensing timers.

As previously discussed, the GPU EIR determined impacts to be less than significant with mitigation. Consistent with the previously approved project, as the Modified Project would have a less-than-significant impact for the detailed above, the Modified 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. The 2019 15183 Checklist determined that the previously approved project would not conflict with any applicable plan, policy or regulation adopted for the purpose of reducing emissions of greenhouse gas emissions.

The Modified Project would include the same number of dwelling units as the previously approved project. The Air Quality and Greenhouse Gas Addendum Letter compares the construction GHG emissions estimated for the previously approved project to construction emissions estimated for the Modified Project, which includes additional 600,000 cubic yards of earthwork onsite. Operationally, the previously approved project and the Modified Project are identical. As described above, consistent with the previously approved project, the Modified Project would not result in a cumulatively considerable contribution to global climate change and would incorporate numerous project design features to reduce construction and operation GHG emissions (see response to 8[a] above). Therefore, no new impacts would occur. As previously discussed, the GPU EIR determined impacts to applicable regulation compliance to be less than significant. Consistent with the previously approved project, as the Modified Project would have a less-than significant impact for the reasons detailed above, it 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 Global Climate Change, the following findings can be made:

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

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

9. Hazards and Hazardous Materials – Would the project:

a) Create a significant hazard to the public or the environment through the routine transport, storage, use, or disposal of hazardous materials or wastes or through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

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

b) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

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

- c) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, or is otherwise known to have been subject to a release of hazardous substances and, as a result, would it create a significant hazard to the public or the environment?
- d) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?
- e) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?
- f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?
- g) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?
- h) Propose a use, or place residents adjacent to an existing or reasonably foreseeable use that would substantially increase current or future resident's exposure to vectors, including mosquitoes, rats or flies, which are capable of transmitting significant public health diseases or nuisances?

Discussion

9(a) The GPU EIR concluded this impact to be less than significant. The 2019 15183 Checklist determined that 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. The Modified Project includes 2,500,000 cubic yards of balanced grading, whereas the original approval included 1,900,000 cubic yards as well as changes to 86 lot lines; lowered building pad elevations in PA1 and PA3 and raised building pad elevations in PA2; revised utility alignments; an additional lot line to split the 100-acre subarea off of the 308.9-acre eastern hills excess biological open space; realigning Street B and associated surface improvements and utilities; adding drainage basins; revising West Lilac Road to provide a dual left turn lane and eastbound bike lane; an additional borrow site in PA3; construction of an equestrian MUP emergency fire access per PDS2016-MUP-16-012; and addition of off-site traffic mitigation. All grading

will remain within the previously approved project footprint. Operationally, the previously approved project and the Modified Project are identical.

Consistent with previously approved project, nine onsite wells would be destroyed (removed) and/or capped. A Well Destruction Permit is required, and the wells are to be destroyed by a licensed well driller. In addition, the existing on-site septic system that serves the existing single-family residence would be abandoned under the Department of Environmental Health (DEH) guidelines. Furthermore, one existing structure is identified for removal. Both a lead survey and asbestos survey is required, and the remediation of lead and asbestos is required prior to the removal of the structure. Consistent with the previously approved project, the Project is required to comply with the conditions of approval and applicable regulations to ensure that impacts related to the disposal of hazardous materials from the removal of structures (wells, septic system, existing residence) is less than significant. Therefore, no new impacts would occur.

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 Modified 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 2019 15183 Checklist determined that the previously approved project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25-mile of the schools.

The Modified Project is located on the same Project site as the previously approved project. All grading will remain within the previously approved project footprint. Operationally, the previously approved project and the Modified Project are identical. Consistent with the previously approved project, the Modified Project is required to comply with applicable regulations pertaining to hazardous waste to ensure that impacts related to hazardous emissions and schools is less than significant. Therefore, no new impacts would occur.

As previously discussed, the GPU EIR determined impacts from hazards to schools to be less than significant. As the Modified 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. The 2019 15183 Checklist determined that the site has not been subject to a release of hazardous substances and that the previously approved 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. The Modified Project would be located on the same Project site as the previously approved project and all grading will remain within the previously approved project footprint. Therefore, no new impacts would occur.

As previously discussed, the GPU EIR determined impacts from existing hazardous materials sites to be less than significant. As the Modified 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 2019 15183 Findings determined that the previously approved project was located within Airport Influence Area 2 of the Camp Pendleton Land Use Compatibility Plan and is consistent with the Plan but not located within an Airport Safety Zone, within an Avigation Easement, an Overflight area or within a Federal Aviation Administration Height Notification Surface area. The Modified Project would be located on the same Project site as the previously approved project. Therefore, no new impacts would occur.

As previously discussed, the GPU EIR determined impacts on public airports to be less than significant. As the Modified Project would have a less-than-significant impact for the reasons detailed above, it 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 2019 15183 Findings determine that the previously approved project is not within one mile of a private airstrip. The Modified Project would be located on the same Project site as the previously approved project. Therefore, no new impacts would occur.

Therefore, consistent with the previously approved project, the Modified Project would be consistent with the analysis within the GPU EIR because it would not create new impacts, increase impacts, and there is no new information of substantial importance than identified within the GPU EIR.

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

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

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

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

- 9(f)(iii) **OIL SPILL CONTINGENCY ELEMENT:** Consistent with the previously approved project, the Modified Project is not located along the coastal zone. Therefore, no new impacts would occur.

- 9(f)(iv) **EMERGENCY WATER CONTINGENCIES ANNEX AND ENERGY SHORTAGE RESPONSE PLAN:** Consistent with the previously approved project, the Modified Project would not alter major water or energy supply infrastructure which could interfere with the plan. Therefore, no new impacts would occur.

- 9(f)(v) **DAM EVACUATION PLAN:** A portion of the Modified Project is located within a dam inundation zone. Consistent with the previously approved project, however, 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. In addition, pursuant to the County Water Authority Approval Letter dated August 2019, the previously approved project was deemed acceptable. The Modified Project would not change any previously approved project features that would impair implementation of or physically interfere with an adopted dam evacuation plan. Therefore, no new impacts would occur.

As previously discussed, the GPU EIR determined impacts from emergency response and evacuation plans to be less than significant with mitigation. As the Modified Project would have a less-than-significant impact for the reasons detailed above, it 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 2019 15183 Checklist determined that the previously approved project would not expose people or structures to a significant risk of loss, injury or death involving wildland fires due to compliance with the regulations relating to emergency access, water supply, and defensible space specified in the Consolidated Fire Code, as described in the approved Fire Protection Plans prepared for the Project by Firewise 2000, Inc., both dated May 2019. The Modified Project includes 2,500,000 cubic yards of balanced grading, whereas the original approval included 1,900,000 cubic yards as well as changes to 86 lot lines; lowered building pad elevations in PA1 and PA3 and raised building pad elevations in PA2; revised utility alignments; an additional lot line to split the 100-acre subarea off of the 308.9-acre eastern hills excess biological open space; realigning Street B and associated surface improvements and utilities; adding drainage basins; revising West Lilac Road to provide a dual left turn lane and eastbound bike lane; an additional borrow site in PA3; construction of an equestrian MUP emergency fire access per PDS2016-MUP-16-012; and addition of off-site traffic mitigation. All grading will remain within the previously approved project footprint. The Modified Project includes off-site road improvements that would enhance local circulation and improve emergency access compared to the previously approved project. Therefore, no new impacts would occur.

As previously discussed, the GPU EIR determined impacts from wildland fires to be significant and unavoidable. However, the Modified Project would have a less-than-significant impact with no required mitigation for the reasons detailed above. Therefore, the Modified 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 2019 15183 Checklist concluded that the previously approved project would comply with both a Vector Control Plan (September 2019) and Manure Management Plan (September 2019) that were submitted to the County and conceptually approved by the Department of Environmental Health and Quality (DEHQ) for the existing equestrian facility. The Modified Project includes 2,500,000 cubic yards of balanced grading, whereas the original approval included 1,900,000 cubic yards as well as changes to 86 lot lines; lowered building pad elevations in PA1 and PA3 and raised building pad elevations in PA2; revised utility alignments; an additional lot line to split the 100-acre subarea off of the 308.9-acre eastern hills excess biological open space; realigning Street B and associated surface improvements and utilities; adding drainage basins; revising West Lilac Road to provide a dual left turn lane and eastbound bike lane; an additional borrow site in PA3; construction of an equestrian MUP emergency fire access per PDS2016-MUP-16-012; and addition of off-site traffic mitigation. All grading will remain within the previously approved project

footprint and no operational changes are proposed. Therefore, no new impacts would occur.

As previously discussed, the GPU EIR determined less than significant impacts with mitigation from vectors. Consistent with the previously approved project, the Modified Project would have a less-than significant impact from vectors with the incorporation of conditions of a Vector Control Plan and a Manure Management Plan. Therefore, the Modified 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Is the project tributary to an already impaired water body, as listed on the Clean Water Act Section 303(d) list? If so, could the project result in an increase in any pollutant for which the water body is already impaired?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Could the proposed project cause or contribute to an exceedance of applicable surface or groundwater receiving water quality objectives or degradation of beneficial uses?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

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

- Priority Development Project (PDP) Storm Water Quality Management Plan (SWQMP) prepared by Project Design Consultants, dated July 31, 2019.
- Drainage Study prepared by Project Design Consultants, dated July 31, 2019.
- Hydraulic Analysis prepared by Chang Consultants, dated May 22, 2019.

The following responses have incorporated the analysis from the reports.

10(a) The GPU EIR concluded this impact to be significant and unavoidable. The 2019 15183 Checklist determined that the previously approved project would have the potential to generate pollutants during both the construction and operational phases. The Modified Project includes 2,500,000 cubic yards of balanced grading, whereas the original approval included 1,900,000 cubic yards as well as changes to 86 lot lines; lowered building pad elevations in PA1 and PA3 and raised building pad elevations in PA2; revised utility alignments; an additional lot line to split the 100-acre subarea off of the 308.9-acre eastern

hills excess biological open space; realigning Street B and associated surface improvements and utilities; adding drainage basins; revising West Lilac Road to provide a dual left turn lane and eastbound bike lane; an additional borrow site in PA3; construction of an equestrian MUP emergency fire access per PDS2016-MUP-16-012; and addition of off-site traffic mitigation. All grading will remain within the previously approved project footprint. Similar to the previously approved project, the Modified Project would prepare and implement a Storm Water Pollution Prevention Plan (SWPPP) in accordance with the National Pollutant Discharge Elimination Systems Construction General Permit adopted by the State Water Resources Control Board. Therefore, no new impacts would occur.

As previously discussed, the GPU EIR determined significant and unavoidable impacts to water quality standards and requirements. However, the Modified Project would have a less-than-significant impact to water quality standards with implementation of conditions as detailed above. The conditions are consistent with the GPU EIR mitigation measures Hyd-1.2 through Hyd-1.5. Therefore, the Modified Project would be consistent with the analysis 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 2019 15183 Checklist determined that the previously approved project could result in the release of pollutants including chloride and total dissolved solids which the San Luis Rey hydrologic unit is impaired for. The Modified Project includes 2,500,000 cubic yards of balanced grading, whereas the original approval included 1,900,000 cubic yards as well as changes to 86 lot lines; lowered building pad elevations in PA1 and PA3 and raised building pad elevations in PA2; revised utility alignments; an additional lot line to split the 100-acre subarea off of the 308.9-acre eastern hills excess biological open space; realigning Street B and associated surface improvements and utilities; adding drainage basins; revising West Lilac Road to provide a dual left turn lane and eastbound bike lane; an additional borrow site in PA3; construction of an equestrian MUP emergency fire access per PDS2016-MUP-16-012; and addition of off-site traffic mitigation. All grading will remain within the previously approved project footprint. Consistent with the previously approved project, the Modified Project would comply with the WPO (identified as mitigation measure Hyd-1.2) and implement site design measures, source control BMPs, and structural BMPs to prevent a significant increase of pollutants to receiving waters. Therefore, no new impacts would occur.

As previously discussed, the GPU EIR determined significant and unavoidable impacts to water quality standards and requirements. However, the Modified 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 Modified Project would be consistent with the analysis within the GPU EIR because it would not create new impacts, increase impacts, and there is no new information of substantial importance than identified within the GPU EIR.

- 10(c) The GPU EIR concluded this impact to be significant and unavoidable. The 2019 15183 Checklist determined that previously approved project would not cause or contribute to an exceedance of applicable surface or groundwater receiving water quality objectives or degradation of beneficial uses. The Modified Project includes 2,500,000 cubic yards of balanced grading, whereas the original approval included 1,900,000 cubic yards as well as changes to 86 lot lines; lowered building pad elevations in PA1 and PA3 and raised building pad elevations in PA2; revised utility alignments; an additional lot line to split the 100-acre subarea off of the 308.9-acre eastern hills excess biological open space;

realigning Street B and associated surface improvements and utilities; adding drainage basins; revising West Lilac Road to provide a dual left turn lane and eastbound bike lane; an additional borrow site in PA3; construction of an equestrian MUP emergency fire access per PDS2016-MUP-16-012; and addition of off-site traffic mitigation. All grading will remain within the previously approved project footprint. As stated in responses 10(a) and 10(b) above, implementation of BMPs and compliance with required ordinances would ensure that project impacts are less than significant. Therefore, no new impacts would occur.

As previously discussed, the GPU EIR determined significant and unavoidable impacts to water quality standards and requirements and groundwater supplies and recharge. However, the Modified Project would have a less than significant impact to water quality standards and requirements and groundwater supplies and recharge with implementation of the source control and treatment control BMPs. Therefore, the Modified Project would be consistent with the analysis within the GPU EIR because it would not create new impacts, increase impacts, and there is no new information of substantial importance than identified within the GPU EIR.

- 10(d) The GPU EIR concluded this impact to be significant and unavoidable. The 2019 15183 Checklist determined that previously approved project would continue to use groundwater but would not drill any additional groundwater wells. The Modified Project would not change. All grading will remain within the previously approved project footprint. Therefore, no new impacts would occur.

As previously discussed, the GPU EIR determined significant and unavoidable impacts to groundwater supplies and recharge. However, the Modified Project would have a less-than-significant impact to groundwater recharge with mitigation (Hyd-1.2 through Hyd-1.5). Therefore, the Modified Project would not 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 2019 15183 Checklist determined that substantial erosion or siltation would not occur on or off-site because storm water management plans are prepared for both the construction and post-construction phases of the development. The Modified Project would grade within the previously approved project footprint. Similar to the previously approved project, during the construction phase, the Modified Project would be required to prepare a SWPPP. The SWPPP would implement the following typical erosion control BMPs: hydraulic stabilization hydroseeding on disturbed slopes, County Standard lot perimeter protection detail and County Standard desilting basin for erosion control on disturbed flat areas; energy dissipator outlet protection for water velocity control; silt fencing, fiber rolls, gravel and sand bags, storm drain inlet protection and engineered desilting basin for sediment control; stabilized construction entrance, street sweeping and vacuuming for offsite tracking of sediment; and measures to control materials management and waste management. Therefore, no new impact would occur.

As previously discussed, the GPU EIR determined significant and unavoidable impacts to erosion or siltation. However, consistent with the previously approved project, the Modified Project would have a less than significant impact to erosion or siltation with the implementation of project BMPs, consistent with GPU mitigation measures (Hyd-1.2 through Hyd-1.5). Therefore, the Modified Project would be consistent with the analysis within the GPU EIR because it would not create new impacts, increase impacts, and there is no new information of substantial importance than identified within the GPU EIR.

- 10(f) The GPU EIR concluded this impact to be less than significant with mitigation. The 2019 15183 Checklist determined that the previously approved project would not alter the existing drainage pattern in a manner which would result in flooding on- or off-site. The Modified Project is located on the same Project site as the previously approved project. The Modified Project includes minor changes to the topography and would add drainage basins as compared to the previously approved project. These drainage basins would be designed and implemented consistent with the previously approved basins. The Modified Project's drainage patterns would continue to mimic the existing conditions of the site. In addition, no grading would encroach within the revised floodway and the proposed residential pads have been designed to be several feet higher than the adjacent 100-year water surface elevations, Therefore, no new impacts would occur.

As previously discussed, the GPU EIR determined impacts to flooding as less than significant with mitigation. The Modified Project would have a less-than-significant impact to flooding with the incorporation of EIR Mitigation Measure Hyd-6.1. This condition requires compliance with the Resource Protection Ordinance to prohibit development in a floodway. Therefore, the Modified Project would be consistent with the analysis within the GPU EIR because it would not create new impacts, increase impacts, and there is no new information of substantial importance than identified within the GPU EIR.

- 10(g) The GPU EIR concluded this impact to be less than significant with mitigation. The 2019 15183 Checklist determined that the previously approved project would not increase peak flows; therefore, the previously approved project would not contribute runoff water that would exceed the capacity of existing or planned storm water drainage systems. The Modified Project is located on the same Project site as the previously approved project. The Modified Project includes minor changes to the topography and would add drainage basins as compared to the previously approved project. These drainage basins would be designed and implemented consistent with the previously approved basins. The Modified Project's drainage patterns would continue to mimic the existing conditions of the site. Therefore, no new impacts would occur.

As previously discussed, the GPU EIR determined impacts to water quality standards and requirements as significant and unavoidable. With mitigation, the Modified 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 Modified Project would be consistent with the analysis within the GPU EIR because it would not create new impacts, increase impacts, and there is no new information of substantial importance than identified within the GPU EIR.

- 10(h) The GPU EIR concluded this impact to be significant and unavoidable. The 2019 15183 Checklist determined that the previously approved project has the potential to generate pollutants; however, site design measures, source control BMPs, and treatment control BMPs as indicated in response 10(a) would be employed such that potential pollutants would be reduced to the maximum extent practicable. In addition, septic layout designs have been reviewed and incorporated GPU EIR Mitigation Measure Hyd-1.9 as a design feature. The Modified Project would similarly implement site design measures, source control BMPs, and treatment control BMPs. Therefore, no new impacts would occur.

As previously discussed, the GPU EIR determine impacts to water quality standards and requirements as significant and unavoidable. However, the Modified Project would have a less-than-significant impact to water quality standards with the implementation of GPU EIR mitigation measures Hyd-1.2 through Hyd-1.5 and Hyd-1.9. Therefore, the Modified

Project would be consistent with the analysis within the GPU EIR because it would not create new impacts, increase impacts, and there is no new information of substantial importance than identified within the GPU EIR.

- 10(i) The GPU EIR concluded this impact to be less than significant with mitigation. The 2019 15183 Checklist determined that the previously approved project grading would meet the County and FEMA hydraulic regulations. In addition, a Conditional Letter of Map Revision (CLOMR) and a Letter of Map Revision (LOMR) pursuant to the Federal Emergency Management Agency (FEMA) would be required for the previously approved project. All grading for the Modified Project will remain within the previously approved project footprint and would not encroach within the floodway. The same mitigation and conditions of approval apply to the Modified Project. Therefore, no new impacts would occur. As previously discussed, the GPU EIR determined impacts from housing within a 100-year flood hazard area as less than significant with mitigation. The Modified Project would incorporate Project conditions consistent with the GPU EIR mitigation measures Hyd-1.2 through Hyd-1.5. Therefore, the Modified Project would be consistent with the analysis within the GPU EIR because it would not create new impacts, increase impacts, and there is no new information of substantial importance than identified within the GPU EIR.

- 10(j) The GPU EIR concluded this impact to be less than significant with mitigation. The 2019 15183 Checklist determined that the previously approved project would not impede or redirect flood flows. The Project includes 2,500,000 cubic yards of balanced grading, whereas the original approval included 1,900,000 cubic yards as well as changes to 86 lot lines; lowered building pad elevations in PA1 and PA3 and raised building pad elevations in PA2; revised utility alignments; an additional lot line to split the 100-acre subarea off of the 308.9-acre eastern hills excess biological open space; realigning Street B and associated surface improvements and utilities; adding drainage basins; revising West Lilac Road to provide a dual left turn lane and eastbound bike lane; an additional borrow site in PA3; construction of an equestrian MUP emergency fire access per PDS2016-MUP-16-012; and addition of off-site traffic mitigation. All grading will remain within the previously approved project footprint and would not impeded or redirect flood flows. Therefore, no impacts would occur.

As previously discussed, the GPU EIR determined impacts from housing within a 100-year flood hazard area as less than significant with mitigation. The Modified Project would have a less-than-significant impact for the reasons detailed above and is consistent with GPU EIR mitigation measure Hyd-6.1. Therefore, the Modified Project would be consistent with the analysis within the GPU EIR because it would not create new impacts, increase impacts, and there is no new information of substantial importance than identified within the GPU EIR.

- 10(k) The GPU EIR concluded this impact to be less than significant with mitigation. The 2019 15183 Checklist determined that the previously approved project's grading would meet the County and FEMA hydraulic regulations and no impact would occur as a result of flooding from the 100-year flood. The Modified Project grading will remain within the previously approved project footprint and would not encroach within the floodplain. Therefore, no new impacts would occur.

As previously discussed, the GPU EIR determined impacts from housing within a 100-year flood hazard area and emergency response and evacuation plans as less than significant with mitigation. The Modified Project would have a less-than-significant impact for the reasons detailed above and is consistent with GPU EIR mitigation measure Hyd-

6.1. Therefore, the Modified Project would be consistent with the analysis within the GPU EIR because it would not create new impacts, increase impacts, and there is no new information of substantial importance than identified within the GPU EIR.

- 10(l) The GPU EIR concluded this impact to be less than significant with mitigation. The 2019 15183 Checklist determined that

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 and would not interfere with the adopted Dam Evacuation Plan. The Modified Project would be located on the same Project site as the previously approved project and all grading will remain within the previously approved project footprint. Therefore, no new impacts would occur.

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 Modified Project would have a less-than-significant impact for the reasons detailed above and is consistent with GPU EIR mitigation measures Hyd-6.1 and Hyd-8.2. Therefore, the Modified Project would be consistent with the analysis within the GPU EIR because it would not create new impacts, increase impacts, and there is no new information of substantial importance than identified within the GPU EIR.

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

SEICHE: The Project site is not located along the shoreline of a lake or reservoir. Therefore, no new impacts would occur.

- 10(m)(ii) TSUNAMI: The Project site is not located in a tsunami hazard zone. Therefore, no new impacts would occur.

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

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

Conclusion

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

1. No peculiar impacts to the project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. Feasible mitigation measures contained within the GPU EIR (Hyd-1.2 through Hyd-1.5, Hyd-1.9, Hyd-6.1 and Hyd-8.2) would be applied to the Project. The mitigation measures, as detailed above, require compliance with the Guidelines for Determining Significance for Hydrology and Water Quality as well as for Dam Inundation, the

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

11. Land Use and Planning – Would the project:

- | | | | |
|---|--------------------------|--------------------------|--------------------------|
| a) Physically divide an established community? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Discussion

11(a) The GPU EIR concluded this impact as less than significant. The 2019 15183 Checklist determined that the previously approved project is consistent with the allowed density in the County of San Diego General Plan. The Modified Project would include the same number of dwelling units as the previously approved project. All grading would remain within the previously approved project footprint and no changes to the operational component would occur. Therefore, no new impact would occur.

As previously discussed, the GPU EIR determined impacts from physically dividing an established community as less than significant with mitigation. Consistent with the previously approved project, the Modified Project would have a less-than-significant impact for the detailed above and has incorporated GPU EIR Mitigation Measures Lan-1.1 through Lan-1.3 in the Project design. Therefore, the Modified 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. The 2019 15183 Checklist determined that the previously approved project would not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the Project adopted for the purposes of avoiding or mitigating an environmental effect. The Modified Project would not result in any changes that would conflict with an applicable plan, policy, or regulation. All grading would remain within the previously approved project footprint and no changes to the operational component would occur. Therefore, no new impacts would occur.

As previously discussed, the GPU EIR determined impacts to conflicts with land use plans, policies, regulations as less than significant. Consistent with the previously approved project, the Modified Project would have a less-than significant impact for the reasons detailed above and 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. Feasible mitigation measures contained within the GPU EIR (Lan-1.1 through Lan1.3) have been applied to the Project requiring coordination efforts to ensure that development of the site would not divide an established community.

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

12. Mineral Resources – Would the project:

- | | | | |
|---|--------------------------|--------------------------|--------------------------|
| a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Discussion

- 12(a) The GPU EIR determined that impacts to mineral resources would be significant and unavoidable.

The 2019 15183 Checklist determined that the loss of the alluvial deposits within the Project site would be considered significant, pursuant to County Guidelines.

The Modified Project would be located on the same Project site as the previously approved project. All grading would remain within the previously approved project footprint. Therefore, no new impacts would occur. As mitigation was previously determined to be infeasible by the GPU EIR, there would be no other feasible mitigation for the Modified Project beyond what was already required (complying with the County Guidelines for Determining Significance for Mineral Resources). Therefore, consistent with the GPU EIR, impacts would be significant and unavoidable.

- 12(b) The GPU EIR concluded this impact to be significant and unavoidable. The 2019 15183 Checklist determined that 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 Modified Project would be located on the same Project site. Therefore, no new impacts would occur. The Modified 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. As there are no feasible mitigation measures, the Project's impacts to mineral resources would be significant and unavoidable. Since the GPU EIR concluded significant and unavoidable impacts to mineral resources, 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion

A Noise Addendum Letter was prepared for the proposed Project by Ldn Consulting, Inc., dated February 10, 2024.

13(a) The GPU EIR concluded this impact to be less than significant with mitigation. The 2019 15183 Checklist determined that the previously approved project would not expose people to potentially significant noise levels that exceed the allowable limits of the General Plan, Noise Ordinance. The Modified Project includes 2,500,000 cubic yards of balanced grading, whereas the original approval included 1,900,000 cubic yards as well as changes to 86 lot lines; lowered building pad elevations in PA1 and PA3 and raised building pad elevations in PA2; revised utility alignments; an additional lot line to split the 100-acre subarea off of the 308.9-acre eastern hills excess biological open space; realigning Street B and associated surface improvements and utilities; adding drainage basins; revising

West Lilac Road to provide a dual left turn lane and eastbound bike lane; an additional borrow site in PA3; construction of an equestrian MUP emergency fire access per PDS2016-MUP-16-012; and addition of off-site traffic mitigation. All grading would remain within the previously approved project footprint. A Noise Addendum Letter was prepared to update the construction analysis based on the proposed change in grading quantities when compared to the previously approved project. None of the operational components of the Project site have changed (i.e., unit count, mechanical equipment and traffic volumes).

The area surrounding the Project site consists of parcels that are zoned Rural Residential (RR), Limited Agriculture (A70), Specific Plan (S88), Open Space (S80), and Mobile home Residential (RMH4).

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) or increase of 10 dB (CNEL) over pre-existing noise. Projects which could produce noise in excess of 60 dB(A) are required to incorporate design measures or mitigation as necessary to comply with the Noise Element. Consistent with the previously approved project, the Modified Project is not expected to expose any on- and off-site, existing, or planned noise sensitive areas to noise in excess of 60 dB(A) or increase of 10 dB (CNEL) over the pre-existing noise.

Noise Ordinance – Section 36-404: Consistent with the previously approved project, non-transportation noise generated by the Modified Project is not expected to exceed the standards of the Noise Ordinance at or beyond the Project's property line. The site is zoned A70, S80, and Variable Family Residential (RV) that has a one-hour average sound limit of 50 dBA daytime and 45 dBA nighttime. The adjacent properties are zoned RR, A70, S88, S80, and RMH4. The Modified Project does not involve any noise producing equipment that would exceed applicable noise levels at the adjoining property line.

Noise Ordinance – Section 36.408, 36.409, and 36.410: Similar to the previously approved project, the Modified Project would not generate construction noise in excess of Noise Ordinance standards. Construction operations would occur only during permitted hours of operation. Also, it is not anticipated that the Modified Project would operate construction equipment in excess of an average sound level of 75 dB between the hours of 7 AM and 7 PM. Rock drills would be located at a minimum of 200 feet from the nearest occupied residential property line and would comply with the Noise Ordinance noise limit of 82 dBA, Section 36.410 (a). However, to be in compliance with the 75 dBA noise limit pursuant to Section 36.409, the rock drill must be at least 225 feet from any occupied noise sensitive land use. Consistent with the previously approved project, as conditioned for the Modified Project, any work occurring with 225 feet of an adjacent property line would be required to provide further noise analysis and mitigation.

Consistent with the previously approved project, the following conditions shall be applied to the Modified Project:

Blasting Noise Plan

- Prior to any ground disturbing activities, the applicant shall submit to, and receive approval from, the Director of PDS, a Blasting Plan consistent with Noise and an Exhibit showing all location of where blasting activities would occur.

Temporary Rock Crushing and Drilling

- Prior to any ground disturbing activities, the applicant shall submit to, and receive approval from, the Director of PDS, an Exhibit showing all locations where rock crushing and drilling would occur. The location of any temporary rock crushing and drilling activities shall be adequately setback.
- During ground disturbing activities, the location of any temporary rock crushing and rock drilling activities shall be adequately setback.

Temporary Construction Noise

- During ground disturbing activities, the Project shall comply with the temporary construction noise control measures and shall comply with the eight-hour average sound level of 75 dBA pursuant to Noise Ordinance Section 36.408 and 36.409.

As previously discussed, the GPU EIR determined impacts from excessive noise levels to be less than significant with mitigation. Consistent with the previously approved project, the Modified Project would have a less than significant impact with specific Project conditions. These conditions are consistent with GPU EIR Mitigation Measures Noi-1.1 and Noi-4.2. Therefore, the Modified Project would be consistent with the analysis 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 2019 15183 Checklist determined that residential uses would be setback more than 600 feet from any public road or transit Right-of-Way and would not be impacted by groundborne vibration or groundborne noise levels. The Modified Project is located on the same Project site as the previously approved project. All grading would remain within the previously approved project footprint. None of the operational components have changed (i.e., unit count, mechanical equipment and traffic volumes). Therefore, no new impacts would occur.

As previously discussed, the GPU EIR determined impacts from excessive groundborne vibration to be less than significant with mitigation. Consistent with the previously approved project, the Modified Project would have a less-than-significant impact with no required mitigation for the reasons detailed above. Therefore, the Modified 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 determined impacts from permanent increase in ambient noise levels to be significant and unavoidable. The 2019 15183 Checklist determined that the previously approved 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 Modified Project does not change the number of dwelling units. All grading would remain within the previously approved project footprint. None of the operational components have changed (i.e., unit count, mechanical equipment and traffic volumes). See response 13 a). Therefore, no new impacts would occur.

As previously discussed, the GPU EIR determined impacts from permanent increase in ambient noise levels to be significant and unavoidable. Consistent with the previously approved project, the Modified Project would have a less-than significant impact with no required mitigation for the reasons detailed above. Therefore, the Modified 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 2019 15183 Checklist determined that the previously approved project does not involve any operational uses that may create substantial temporary or periodic increases in ambient noise levels in the Project vicinity. As discussed above in 13 a), construction noise is not expected to exceed the construction noise limits of the Noise Ordinance. Construction operations would occur only during permitted hours of operation. Also, the Project would not operate construction equipment in excess of 75 dB for more than 8 hours during a 24-hour period. Therefore, no new impacts would occur.
As previously discussed, the GPU EIR determined impacts from temporary increase in ambient noise levels to be less than significant with mitigation. Consistent with the previously approved project, the Modified Project would have a less than significant impact with specific Project conditions (listed in response 13[a]). Therefore, the Modified 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 2019 15183 Checklist determined that the previously approved project would be consistent with the Airport Land Use Compatibility Plan (ALUCP) for Camp Pendleton Air Terminal and is consistent with the plan. The Modified Project includes the same operational components as the previously approved project. Therefore, no new impacts would occur. The Modified 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 2019 15183 Checklist determined that the site is not located within a 1.0-mile vicinity of a private airstrip. The Modified Project is located on the same Project site as the previously approved project. Therefore, no new impacts would occur. The Modified 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. Feasible mitigation measures contained within the GPU EIR (Noi-1.1 and Noi-4.2), would be applied to the Project. Those mitigation measures, detailed above, require the Project to prepare and implement a blasting plan, setback of rock crushing and drilling activities, and ordinance compliance.

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

14. Population and Housing – Would the project:

- | | | | |
|---|--------------------------|--------------------------|--------------------------|
| a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Discussion

14(a) The GPU EIR concluded this impact to be less than significant. The 2019 15183 Checklist determined that the previously approved project does not propose any physical or regulatory change that would remove a restriction to or encourage population growth in the area. The Modified Project would be located on the same Project site as the previously approved project. All grading would remain within the previously approved project footprint and no changes to the unit count would occur. Therefore, no new impacts would occur.

As previously discussed, the GPU EIR determined impacts from population growth to be less than significant. Consistent with the previously approved project, the Modified Project would have a less-than-significant impact for the reasons detailed above and 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 2019 15183 Checklist determined that the previously approved project would not displace substantial numbers of existing housing. The Modified Project is located on the same Project site as the previously approved project. All grading would remain within the previously approved project footprint and would not displace a substantial number of homes. Therefore, no new impacts would occur.

As previously discussed, the GPU EIR determined impacts from displacement of housing to be less than significant. Consistent with the previously approved project, the Modified Project would have a less-than significant impact for the reasons detailed above and 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 2019 15183 Checklist determined that the previously approved project, would not displace a substantial number of people. The Modified Project would have the same operating characteristics as the previously approved project. All grading would remain within the previously approved project footprint and would not displace a substantial number of people. Therefore, no new impacts would occur.

As previously discussed, the GPU EIR determined impacts from displacement of people to be less than significant. Consistent with the previously approved project, the Modified Project would have a less-than-significant impact for the reasons detailed above and 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.

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

15. Public Services – Would the project:

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

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

Discussion

15(a) The GPU EIR concluded this impact to be less than significant with mitigation for the exception of school services, which remained significant and unavoidable. The 2019 15183 Checklist determined that there would be adequate public facilities to serve the previously approved project. No changes to the operational components of the previously approved project would occur, and there would be adequate public facilities to serve the Modified Project and would not result in the need for significantly altered services or facilities. Therefore, no new impacts would occur.

As previously discussed, the GPU EIR determined impact to fire protection services, police protection services and other public services as less than significant with mitigation while school services remained significant and unavoidable. However, as the Modified Project would have a less-than significant impact for the reasons stated above, the Modified 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.

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

16. Recreation – Would the project:

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

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

b) Does the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?

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

Discussion

16(a) The GPU EIR concluded this impact to be less than significant with mitigation. The 2019 15183 Checklist concluded that the previously approved project would increase the use of existing parks and other recreational facilities; however, through dedication of land to public or private parks impacts would be reduced. The Modified Project would have the same operating characteristics and the same number of dwelling units. No changes to the operational component would occur. Therefore, no new impacts would occur.

As previously discussed, the GPU EIR determined impacts related to deterioration of parks and recreational facilities to be less than significant. Consistent with the previously approved project, the Modified Project would have a less-than-significant impact for the reasons detailed above and 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 2019 15183 Checklist determined that impacts from the proposed recreational amenities have been considered as part of the overall environmental analysis. All grading would remain within the previously approved project footprint and no changes to the operational component would occur. Therefore, no new impact would occur.

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

Conclusion

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

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

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

17. Transportation and Traffic – Would the project:

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

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

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

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

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

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

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

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

e) Result in inadequate emergency access?

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

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

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

Discussion

17(a) The GPU EIR concluded this impact to be significant and unavoidable. The County of San Diego Guidelines for Determining Significance and Report Format and Content

Requirements for Transportation and Traffic (Transportation Guidelines) establish measures of effectiveness for the performance of the circulation system. These Guidelines incorporate standards from the County of San Diego Public Road Standards, Mobility Element, and the Transportation Impact Fee Program.

The 2019 15183 Checklist determined that the previously approved project would result in direct and cumulative impacts to the study area intersections and road segments. Impacts would be reduced with the implementation of improvements and/or mitigation measures as described in the 2019 15183 Checklist.

The Project includes 2,500,000 cubic yards of balanced grading, whereas the original approval included 1,900,000 cubic yards as well as changes to 86 lot lines; lowered building pad elevations in PA1 and PA3 and raised building pad elevations in PA2; revised utility alignments; an additional lot line to split the 100-acre subarea off of the 308.9-acre eastern hills excess biological open space; realigning Street B and associated surface improvements and utilities; revising West Lilac Road to provide a dual left turn lane and eastbound bike lane; construction of an equestrian MUP emergency fire access per PDS2016-MUP-16-012; and addition of off-site traffic mitigation, adding drainage basins; and, an additional borrow site in PA3.. All grading would remain within the previously approved project footprint and no changes to the operational component would occur including the proposed unit count. Therefore, no new impact would occur.

As previously discussed, the GPU EIR determined significant and unavoidable impacts to unincorporated County traffic and LOS standards. The Modified Project would have a less-than-significant impact to County roadway and road segments with the incorporation of GPU EIR mitigation measures while impacts to Caltrans facilities would remain significant and unmitigable. However, the Modified Project would not result in a peculiar impact to the site, or a more severe impact than anticipated in the GPU EIR. Therefore, the Modified Project would be consistent with the analysis within the GPU EIR because it would not create new impacts, increase impacts, and there is no new information of substantial importance than identified within the GPU EIR.

- 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 Congestion Management Program 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. Same as the previously approved project, the Modified Project would not conflict with an applicable congestion management program and 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 2019 15183 Checklist concluded that the previously approved project is located within an ALUCP for Camp Pendleton Air Terminal and is consistent with the plan and that no specific requirements are required. The Modified Project would be located on the same Project site as the previously approved project. All grading would remain within the previously approved project footprint and no changes to the operational component would occur. Therefore, no new impacts would occur. 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(d) The GPU EIR concluded this impact to be significant and unavoidable. The 2019 15183 Checklist determined that previously approved project would not substantially alter traffic patterns, roadway design, place incompatible uses (e.g., farm equipment) on existing roadways, or create curves, slopes or walls which would impede adequate sight distance on a road. The Modified Project includes 2,500,000 cubic yards of balanced grading, whereas the original approval included 1,900,000 cubic yards as well as changes to 86 lot lines; lowered building pad elevations in PA1 and PA3 and raised building pad elevations in PA2; revised utility alignments; an additional lot line to split the 100-acre subarea off of the 308.9-acre eastern hills excess biological open space; realigning Street B and associated surface improvements and utilities; adding drainage basins; revising West Lilac Road to provide a dual left turn lane and eastbound bike lane; an additional borrow site in PA3; construction of an equestrian MUP emergency fire access per PDS2016-MUP-16-012; and addition of off-site traffic mitigation. All grading would remain within the previously approved project footprint. All roadway improvements would be designed to confirm to County Roadway Standards. Therefore, no new impacts would occur.

As previously discussed, the GPU EIR determined impacts on rural road safety to be significant and unavoidable. However, the Modified Project would have a less-than-significant impact with no mitigation required for the reasons detailed above. Therefore, the Modified 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 2019 15183 Checklist determined that the previously approved project would provide adequate emergency fire access. The Modified Project includes a revision to the Tentative Map, PDS2016-TM-5615, to construct an equestrian MUP emergency fire access per PDS2016-MUP-16-012. In addition, previously approved project and consistent with GPU EIR mitigation measure Tra-4.2, the Modified Project would implement the Building and Fire codes to ensure emergency access accessibility. Therefore, no new impacts would occur.

As previously discussed, the GPU EIR determined impacts on emergency access as less than significant with mitigation. Consistent with the previously approved project, the Modified Project would have a less-than-significant impact for the reasons detailed above and is consistent with GPU EIR Mitigation Measure Tra-4.2, and the Modified 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 2019 15183 Checklist concluded that the previously approved 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 and would not generate sufficient travel demand to increase demand for transit, pedestrian or bicycle facilities. The Modified Project includes 2,500,000 cubic yards of balanced grading, whereas the original approval included 1,900,000 cubic yards as well as changes to 86 lot lines; lowered building pad elevations in PA1 and PA3 and raised building pad elevations in PA2; revised utility alignments; an additional lot line to split the 100-acre subarea off of the 308.9-acre eastern hills excess biological open space; realigning Street B and associated surface improvements and utilities; adding drainage basins; revising West Lilac Road to provide a dual left turn lane and eastbound bike lane; an additional borrow site in PA3; construction of an equestrian MUP emergency fire access per PDS2016-MUP-16-012; and addition of off-site traffic mitigation. All grading would remain within the previously

approved project footprint and no changes to the operational component would occur. Therefore, no new impacts would occur.

As previously discussed, the GPU EIR determined impacts on alternative transportation and rural safety as less than significant with mitigation. Consistent with the previously approved project, the Modified Project would have a less-than-significant impact for the reasons detailed above, it 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-1.3, Tra-1.4, Tra-1.7, Tra-2.1 and 4.2) would be applied to the Project. The mitigation measures, as detailed above, would require the Project applicant to comply with the County Public Road Standards, Guidelines for Determining Significance, County TIF Ordinance, coordinate with other jurisdictions to identify appropriate mitigation and implement the Building and Fire Codes to ensure adequate services are in place.

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
18. Utilities and Service Systems – Would the project:			
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project’s projected demand in addition to the provider’s existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?
- 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 2019 15183 Checklist concluded that there is adequate capacity to serve the previously approved project. All grading would remain within the previously approved project footprint and no changes to the operational component would occur. Therefore, no new impacts would occur.

As previously discussed, the GPU EIR determined impacts on wastewater treatment requirements to be less than significant. Consistent with the previously approved project, the Modified Project would have a less than-significant impact for the reasons detailed above and 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 2019 15183 Checklist concluded that impacts on wastewater treatment would be less than significant. The Modified Project would have the same operating characteristics and the same number of dwelling units as the previously approved project. All grading would remain within the previously approved project footprint. Consistent with the previously approved project, the proposed waste and wastewater pipeline extensions and other improvements would not result in additional adverse physical effects beyond those already identified in other sections of this environmental analysis. Therefore, no new impacts would occur.

As previously discussed, the GPU EIR determined impacts on wastewater treatment requirements to be less than significant. Consistent with the previously approved project, the Modified Project would have a less than-significant impact for the reasons detailed above and 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 2019 15183 Checklist concluded that the stormwater facilities for the previously approved project would not result in additional adverse physical effects beyond those already identified in other sections of this environmental analysis. The Modified Project is a revision and time extension for Tentative Map, PDS2016-TM-5615. The revision includes 2,500,000 cubic yards of balanced grading and new storm water drainage facilities, including new drainage basins. All grading would remain in the previously approved project footprint. Consistent with previously approved project, the new stormwater facility would not result in additional adverse effect beyond those already identified in other sections of this environmental analysis. Therefore, no new impacts would occur.

As previously discussed, the GPU EIR determined impacts on sufficient stormwater drainage facilities to be less than significant. As the Modified Project would have a less-

than-significant impact for the reasons detailed above, the Modified 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 2019 15183 Checklist determined that there is adequate water to serve the previously approved project. All grading would remain within the previously approved project footprint. No changes to the operational components would occur. Therefore, no new impacts would occur.

As previously discussed, the GPU EIR determined impacts to adequate water supplies be significant and unavoidable. Consistent with the previously approved project, the Modified Project would have a less-than significant impact with no required mitigation for the reasons detailed above. Therefore, the Modified 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 2019 15183 Checklist determined that there is adequate wastewater capacity to serve the previously approved project. All grading would remain within the previously approved project footprint. No changes to the operational components would occur. Therefore, no new impacts would occur.

As previously discussed, the GPU EIR determined impacts to adequate wastewater facilities to be less than significant with mitigation. Consistent with the previously approved project, the Modified Project would have a less than significant impact for the reasons detailed above and would be consistent with the analysis within the GPU EIR because it would not create new impacts, increase impacts, and there is not new information of substantial importance than identified within the GPU EIR.

- 18(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 Modified Project would be consistent with the analysis within the GPU EIR because it would not create new impacts, increase impacts, and there is not new information of substantial importance than identified within the GPU EIR.

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

Conclusion

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

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

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

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

Discussion

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

19(a) The 2019 15183 Checklist determined that the previously approved project would not substantially impair an adopted emergency response plan or emergency evacuation plan. The Project site is located in a moderate and a very high fire hazard severity zone (FHSZ). The location of the Project within a very high FHSZ requires the preparation of the Fire Protection Plan (FPP) for both the PRD and the equestrian facility. A FPP and a Conceptual Wildland Fire Evacuation Plan was prepared for the previously approved project. The Modified Project would not change the number of dwelling units or operating characteristics. All grading would remain within the previously approved project footprint, therefore, no changes to the FPP or Conceptual Wildland Fire Evacuation Plan are warranted due to the Modified Project Tentative Map revisions.

Therefore, the Project would not Substantially impair an adopted emergency response plan or emergency evacuation plan and no new impacts would occur.

As previously stated, Wildfire was analyzed within the GPU EIR within Section 2.7, Hazards and Hazardous Materials, and was determined to be significant and unavoidable. Consistent with the previously approved project, the Modified Project would have a less-than-significant impact with no required mitigation for the reasons detailed above. Therefore, the Modified 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 2019 15183 Checklist determined that the previously approved project could expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. due to its location within a very high FHSZ. The Modified Project would not change the number of dwelling units and would include construction of an equestrian MUP emergency fire access per PDS2016-MUP-16-012; and addition of off-site traffic mitigation. A FPP and a Conceptual Wildland Fire Evacuation Plan was prepared for the previously approved project. All grading would remain within the previously approved project footprint, therefore, no changes to the FPP or Conceptual Wildland Fire Evacuation Plan are warranted due to the proposed Project Tentative Map revisions.

Consistent with the previously approved project, the following design features and conditions of approval have been incorporated into the Modified Project to reduce the impacts associated to Wildfire:

- All planning areas have an established 100-foot fuel modification zone (FMZ) around the outside perimeter. This buffer provides adequate space to implement a Zone 1 and 2 fuel modification area.
- Water supply would allow fire flows to all mains to meet the required 2500 gallons per minute (GPM). Security gates in PA3 would be installed and designed to North County FPD standards to allow safe emergency egress.
- The Project applicant shall define areas of responsibility for the future HOA as well as private lot owners, particularly in regard to responsibility for the 100-foot brush management zone (BMZ) illustrated on the Project site plan.
- The Project shall implement the ignition-resistant construction standards compliant with California Fire Code and Chapter 7A of the California Building Code for all residential structures.
- In order to mitigate for dead end road lengths which would otherwise exceed maximum allowable lengths, the Project shall construct Dulin Road as a private road through PA3, connecting to the existing public segment of Dulin Road at the Project's eastern boundary.

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. Consistent with the previously approved project, the Modified Project would have a less-than-significant impact with the incorporation of Project conditions consistent with GPU EIR Mitigation Measure Haz-4.3 for compliance with the Building and Fire Code. The Modified Project has also incorporated the GPU EIR Mitigation Measure Haz-4.2 for brush management as a Project design feature. Therefore, the Modified 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 2019 15183 Checklist determined that the previously approved project would 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. The Modified Project includes 2,500,000 cubic yards of balanced grading, whereas the original approval included 1,900,000 cubic yards as well as changes to 86 lot lines; lowered building pad elevations in PA1 and PA3 and raised building pad elevations in PA2; revised utility alignments; an additional lot line to split the 100-acre subarea off of the 308.9-acre eastern hills excess biological open space; realigning Street B and associated surface improvements and utilities; adding drainage basins; revising West Lilac Road to provide a dual left turn lane and eastbound bike lane; an additional borrow site in PA3; construction of an equestrian MUP emergency fire access per PDS2016-MUP-16-012; and addition of off-site traffic mitigation. All grading would occur within the previously approved footprint. No new impacts would occur.

As previously discussed, the GPU EIR determined impacts from Wildfire to be significant and unavoidable. Consistent with the previously approved project, the Modified Project would have a less-than significant impact with the incorporation of design features and conditions consistent with the GPU EIR Mitigation Measures Haz-4.2 and Haz-4.3. Therefore, the Modified 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. The 2019 15183 Checklist determined that the previously approved project would not expose people or structures to significant risk due to post-fire instability with the incorporation with project design features. The Modified Project would include the same operating characteristics of the previously approved project and would construct a new emergency fire access per PDS2016-MUP-16-012 and additional off-site traffic improvements. All grading would occur within the previously approved project footprint and no changes to the operation component would occur. Therefore, no new impacts would occur.

As previously discussed, the GPU EIR determined impacts from Wildfire to be significant and unavoidable. Consistent with the previously approved project, the Modified Project would have a less-than-significant impact with the incorporation of design features and conditions consistent with the GPU EIR Mitigation Measures Haz-4.2 and Haz-4.3. Therefore, the Modified 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 – 2019 15183 Checklist

Appendix B – Technical Studies

Appendix C – 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:

- Helix Environmental Planning. Ocean Breeze Ranch – Addendum to the Biological Resources Technical Report, County of San Diego, PDS2023-TM-5615TER, October 2024
- Ldn Consulting Inc. Noise Addendum Letter - Ocean Breeze Ranch Revised Tentative Map Time Extension - County of San Diego. PDS2023-TM-5615TER, July 2024
- Ldn Consulting Inc. Air Quality and Greenhouse Gas Addendum Letter, PDS2023-TM-5615TER - Ocean Breeze Ranch Revised Tentative Map Time Extension - County of San Diego, July 2024
- Project Design Consultants Addendum, Final Drainage Study Ocean Breeze Ranch – PDS2023-TM-5615TER, County of San Diego, October 2024
- Summers/Murphy & Partners, Inc. – Conceptual Landscape Plan for Ocean Breeze Ranch - PDS2023-TM-5615TER, County of San Diego, August 2024
- Storm Water Quality Management Plan – Ocean Breeze Ranch – LDGRMJ-30295, PDS2023-TM-5615TER, County of San Diego, November 2024

References

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

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

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

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

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

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

Appendix B

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

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