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October 17, 2024

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

Project Name: Spring Valley Housing
Project Record Numbers: PDS2019-TM-5636, PDS2021-AD-21-011
Environmental Log Number: PDS2019-ER-19-19-006

APN(s): 578-161-02-00

Lead Agency Name and Address:

County of San Diego
Planning and Development Services
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County Staff Contact:

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Project Location:

The proposed Spring Valley Housing project (Project) is located within the unincorporated community of Spring Valley in San Diego County. The approximately 9.91-acre Project site is located southwest of the intersection of Grand Avenue and Eucalyptus Street, north of Highway 54, and east of State Route 125. Surrounding the Project site to the north, south, east, and west are single-family and multi-family residences.

Project Applicant Name and Address:

Mark Khouli, Light House Builders Inc.
1620 La Presa Avenue
Spring Valley, CA 91977

General Plan

Community Plan:	Spring Valley
Regional Categories:	Village
Land Use Designations:	Semi Rural Residential (Sr-1)
Density:	1 Dwelling (DU) per Acre
Floor Area Ratio (FAR)	N/A

Zoning

Use Regulation: Rural Residential (RR)
Minimum Lot Size: 1 Acre
Special Area Regulation: None

Description of Project:

The proposed Project would subdivide 9.91 acres located at Grand Avenue and Eucalyptus Street into seven (7) single-family residential lots. The westerly portion of the site would remain undeveloped to support an approximate 5.86-acre biological open space easement. Access to the Project site would be provided by private driveways off Grand Avenue. The Project would involve minor site grading and utilities installation (approximately 2 months). Residential dwellings would be built out individually.

Discretionary Actions:

Discretionary permits for the Project include a Tentative Map that would subdivide the approximately 9.91-acre Project site to 7 single-family residential lots and one biological open space lot. The Project also includes an Administrative Permit to allow lot area averaging for 0.5-acre lots rather than the current minimum 1-acre lot.

Overview of 15183 Checklist

California Public Resources Code (PRC) 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. CEQA Guidelines 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. CEQA Guidelines Section 15183(c) further specifies that if an impact is not peculiar to the parcel or to the proposed project, has been addressed as a significant effect in the prior EIR, or can be substantially mitigated by the imposition of uniformly applied development policies or standards, then an additional EIR need not be prepared for that project solely on the basis of that impact.

General Plan Update Program EIR

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

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

Summary of Findings

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

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

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

- 1. The Project is consistent with the development density established by existing zoning, community plan or general plan policies for which an EIR was certified.**
The Project would divide a 9.91-acre parcel into 7 single-family residential lots, which is consistent with the SR-1 development density established by the GPU and the certified GPU EIR.
- 2. There are no Project specific effects which are peculiar to the Project or its site, and which the GPU EIR failed to analyze as significant effects.**

The subject property is no different than other properties in the surrounding area, and there are no Project-specific effects which are peculiar to the Project or its site. The Project site is located in an area developed with similarly sized residential lots with associated accessory uses. The property does not support any peculiar environmental features, and the Project would not result in any peculiar effects.

In addition, as explained further in the Section 15183 Checklist below, all Project impacts were adequately analyzed by the GPU EIR. The Project could result in potentially significant impacts to air quality, biological resources, cultural resources, hydrology and water quality, and wildfire. However, applicable mitigation measures specified within the GPU EIR have been made conditions of approval for this Project.

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

The Project is consistent with the density and use characteristics of the development considered by the GPU EIR. The GPU EIR considered the incremental impacts of the Project, and as explained further in the Section 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 Section 15183 exemption checklist below, no new information has been identified which would result in a determination of a more severe impact than what had been anticipated by the GPU EIR.

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

As explained in the Section 15183 exemption checklist below, the Project will undertake feasible mitigation measures specified in the GPU EIR. These GPU EIR mitigation measures will be undertaken through Project design, compliance with regulations and ordinances, or through the Project's conditions of approval.

_____ Signature	_____ Date
Daniella Hofreiter _____ Printed Name	_____ Planning 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 CEQA Guidelines Section 15183.

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

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

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

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
1. AESTHETICS – Would the Project:			
a) Have a substantial adverse effect on a scenic vista?	<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 southwest of the intersection of Grand Avenue and Eucalyptus Street in the unincorporated community of Spring Valley. The Spring Valley Community Plan designates Dictionary Hill as an RCA. The Project site is located approximately 0.5 miles from Dictionary Hill County Preserve, which would not afford any views of the Project site due to distance and intervening topography and land uses. In addition, the Project also includes a landscaping plan which would help further screen the Project site. Impacts would be less than significant.

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

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

- 1(b) The GPU EIR concluded this impact to be less than significant with mitigation. State scenic highways refer to those highways that are officially designated by the California Department of Transportation (Caltrans) as scenic (Caltrans - California Scenic Highway Program). Generally, the area defined within a State scenic highway is the land adjacent to and visible from the vehicular right-of-way. The dimension of a scenic highway is usually identified using a motorist's line of vision, but a reasonable boundary is selected when the view extends to the distant horizon. The scenic highway corridor extends to the visual limits of the landscape abutting the scenic highway. The closest State Designated Scenic Highway is a portion of SR-125 located approximately 2.43 miles to the north. SR-94, which is considered eligible for a State Scenic Highway designation, is located approximately 1.88 miles to the north. The Project site is not within the vicinity of a State Designated Scenic Highway and would not substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings.

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

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

The Project site is within a semi-rural area of unincorporated County, located southwest of the intersection of Grand Avenue and Eucalyptus Street. The existing visual character and quality of the Project surroundings are characterized as semi-rural and village single-family residential land use types with relatively flat to increasingly sloped grades.

The proposed Project would not detract from, or contrast with the existing visual character and/or quality of the surrounding areas for the following reasons: consistency with the General Plan density allowance on-site, conformance with the Spring Valley Community Plan and location of the site within a residentially developed area. Additionally, the location, size, and design of the proposed use would be compatible with uses in the immediate area. The proposed development is similar to surrounding single-family residential use types.

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

- 1(d) The GPU EIR concluded this impact to be significant and unavoidable. The proposed Project would use outdoor lighting and is located within Zone B as identified by the San Diego County Light Pollution Code, approximately 47 miles from the Mount Laguna

Observatory and approximately 76 miles from Palomar Observatory. However, the Project would not adversely affect nighttime views or astronomical observations, because the Project would conform to the Light Pollution Code (Section 51.201-51.209), including the Zone B lamp type and shielding requirements per fixture and hours of operation limitations for outdoor lighting and searchlights. The code was developed by the County in cooperation with the lighting engineers, astronomers, and other experts to effectively address and minimize the impact of new sources light pollution on nighttime views. Compliance with the Code would be required prior to issuance of a building permit. Thus, the proposed Project would not create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area.

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

Conclusion

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

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

Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
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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"/>
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b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?

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

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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nature, could result in conversion of forest land to non-forest use?

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

Discussion

2(a) The GPU EIR concluded this impact to be significant and unavoidable. Based on the County of San Diego Geographical Information System (GIS) and aerial imagery, the site is not designated as Department of Conservation, Farmland Mapping and Monitoring Program (FMMP) farmland and as such, would not be classified as an important agricultural resource. The Project site is designated as Urban and Built-Up Land by the Department of Conservation. Therefore, there are no agricultural resources on the site that would be impacted.

As previously discussed, the GPU EIR determined impacts from direct and indirect conversion of agricultural resources to be significant and unavoidable. However, the proposed Project would have no impact. Therefore, the 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 Project site is zoned RR, which is not an agricultural use. The Project site is not within an agricultural preserve or a Williamson Act Contract. Additionally, the Project is for the development of a residential subdivision, which is compatible with the surrounding residential and civic use types. Therefore, the Project would not conflict with existing zoning for agricultural use or a Williamson Act Contract.

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

2(c) The GPU EIR concluded this impact to be significant and unavoidable. The project site including any offsite improvements do not contain any forest lands as defined in PRC Section 12220(g); therefore, Project implementation would not result in the loss or conversion of forest land to a non-forest use. In addition, the County of San Diego does not have any existing Timberland Production Zones.

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

2(d) The GPU EIR concluded this impact to be significant and unavoidable. As indicated in response 2(c), the Project site, or any off-site improvements, are not located near any forest lands. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

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

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

Conclusion

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

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

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)?

Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
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	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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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"/>
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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"/>
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d) Expose sensitive receptors to substantial pollutant concentrations?

	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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e) Create objectionable odors affecting a substantial number of people?

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

An Air Quality Assessment was prepared for the Project by Scientific Resources Associated, dated October 11, 2021 (Attachment B). The following responses have incorporated the analysis from the report.

- 3(a) The GPU EIR concluded this impact to be less than significant. San Diego County is currently designated as a nonattainment area for the federal standards for ozone (O₃) as well as the state standards for O₃, particulate matter less than or equal to 10 microns (PM₁₀), and particulate matter less than or equal to 2.5 microns (PM_{2.5}). The RAQS and the region's portion of the SIP are the region's plans for attainment and maintaining air quality standards. The RAQS and SIP rely on information from the California Air Resources Board (CARB) and San Diego Association of Governments (SANDAG), including projected growth, in order to project future emissions and determine from that the strategies necessary for the reduction of stationary source emissions through regulatory controls. Projects that propose development that is consistent with the land use designations and growth anticipated by the local general plans and SANDAG are, by definition, consistent with the RAQS and SIP.

The GPU designates the Project site as Semi Rural Residential. The Project proposes to build 7 single-family residential dwelling units. This would be consistent with the General Plan land use designation and density. Because the proposed Project is allowed under the General Plan land use designation and would not increase the density or intensity of the land assumed in the GPU EIR, which is used in SANDAG's growth projections, and would not result in growth beyond that assumed in SANDAG's growth assumptions or in the General Plan projections, it is consistent with San Diego County Air Pollution Control District's (SDAPCD's) RAQS and portions of the SIP. As such, the Project would not conflict with either the RAQS or the SIP. In addition, the construction and operational emissions from the Project would be below established screening-level thresholds (SLTs), as addressed under response 3(b), and would not violate any ambient air quality standards.

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

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

A project would have a significant direct impact related to criteria pollutants if it would exceed any of the County's SLTs presented in Table 2 below. The County's SLTs are based on SDAPCD Rules 20.1, 20.2, and 20.3 and were adopted from the SDAPCD Air Quality Impact Analysis trigger level thresholds to align with attainment of the NAAQS and be protective of public health. Therefore, air quality emissions below the SLTs would meet

the NAAQS. The NAAQS were developed to protect public health, specifically the health of “sensitive” populations, including asthmatics, children, and the elderly.

Table 2 County of San Diego Screening Level Thresholds			
Pollutant	Emission Rate		
	Pounds/Hour	Pounds/Day	Tons/Year
Respirable Particulate Matter (PM ₁₀)	--	100	15
Fine Particulate Matter (PM _{2.5})	--	55 ^a	10 ^a
Oxides of Nitrogen (NO _x)	25	250	40
Oxides of Sulfur (SO _x)	25	250	40
Carbon Monoxide (CO)	100	550	100
Lead and Lead Compounds	--	3.2	0.6
Volatile Organic Compounds (VOCs)	--	75 ^b	13.7 ^c

SOURCE: SDAPCD, Rules 20.1, 20.2, 20.3; County of San Diego 2007.
^a Based on the U.S. EPA “Proposed Rule to Implement the Fine Particle National Ambient Air Quality Standards” published September 8, 2005. Also used by the South Coast Air Quality Management District.
^b Threshold for VOCs based on the threshold of significance for VOCs from the South Coast Air Quality Management District for the Coachella Valley.
^c 13.7 tons per year threshold based on 75 pounds per day multiplied by 365 days per year and divided by 2,000 pounds per ton.

Air emissions were calculated using California Emissions Estimator Model (CalEEMod) 2016.3.2. CalEEMod is a tool used to estimate air emissions resulting from land development projects in the state of California. The model generates air quality emission estimates from construction activities and breaks down operational criteria pollutant emissions into three categories: mobile sources (e.g., traffic), area sources (e.g., landscaping equipment, consumer projects, and architectural coatings), and energy sources (e.g., natural gas heating). CalEEMod provides emission estimates of NO_x, carbon monoxide (CO), oxides of sulfur (SO_x), respirable particulate matter (PM₁₀), fine particulate matter (PM_{2.5}), and VOCs. Inputs to CalEEMod include such items as the air basin containing the project, land uses, trip generation rates, trip lengths, duration of construction phases, construction equipment usage, grading areas, as well as other parameters.

The Project proposes to build 7 single-family residential dwelling units. Emissions generated during construction activities would be temporary and localized. Earthwork activities during construction of the Project would require 4,700 cubic yards cut, 2,300 cubic yards of fill, and 2,400 cubic yards of export. Construction activities would be subject to the County of San Diego Grading Ordinance and SDAPCD Rule 55 to reduce fugitive dust. To further reduce potential impacts generated during the construction phase, the Project would include the following project design features, consistent with local, regional, and state regulations as well as GPU EIR mitigation measures Air-2.5, Air-2.6, Air-2.7, and Air-2.9.

- Application of water three times daily during grading on active grading sites.
- Application of water three times daily to unpaved roads.
- Reduced speeds to 15 miles per hour (mph) on unpaved roads.
- Use of architectural coatings that are consistent with SDAPCD Rule 67.0.1, with a VOC content of 100 g/l or less for non-flat coatings and 50 g/l or less for flat coatings.

- Use of U.S. Environmental Protection Agency (USEPA) certified Tier 3 and Tier 4 engines with diesel particulate filters (DPF) during all grading and site preparation activities.

With the application of the measures listed above, Project construction emissions associated with the proposed residential development are not anticipated to exceed the County's construction SLTs, based on the analysis presented in the Air Quality Assessment (Attachment B).

The main operational impacts associated with the Project would include impacts associated with mobile sources; with additional impacts associated with area sources such as energy use and landscaping. Emissions of all pollutants would be below the County's recommended SLTs. Therefore, the Project would not violate any air quality standard or contribute substantially to an existing or projected air quality violation.

As previously discussed, the GPU EIR determined significant and unavoidable impacts to air quality violations. The Project would not violate any air quality standard or contribute substantially to an existing or projected air quality violation and would not result in an impact that was not previously identified in the GPU EIR with the incorporation of mitigation consistent with GPU EIR mitigation measures Air-2.5, Air-2.6, Air-2.7, and Air-2.9.

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

The Project would contribute PM₁₀, PM_{2.5}, NO_x, and VOC emissions from construction/grading activities; however, it would not exceed established SLTs (see response 3(b) above). Additionally, grading and all other construction activities would be subject to the measures listed above, including the implementation of dust control measures consistent with the County of San Diego Grading Ordinance and SDAPCD Rule 55. Additionally, the Project would include the use of USEPA certified Tier 3 and Tier 4 construction equipment with DPF or equivalent for the construction activity, which would further reduce emissions of particulate matter during construction.

The Project would generate PM₁₀, PM_{2.5}, and NO_x emissions during Project operations primarily from mobile sources (i.e., vehicle trips), and VOCs from area and mobile sources. However, as previously described, operational emissions of all pollutants would be below the County's recommended SLTs.

Cumulative impacts could occur if the most intensive phases of construction for the proposed Project occur simultaneously with other intensive phases of proposed projects in close proximity. The most intensive construction phase for the Project and for typical developments occurs during earthwork and grading activities. During these phases, the primary criteria air pollutant of concern would be PM₁₀. As discussed in the Air Quality Assessment (Attachment B), no cumulatively considerable projects exist within a 0.5-mile radius from the Project site. In addition, the Project's estimated emissions of criteria air

pollutants, specifically PM₁₀, was estimated to be 3.47 lb/day (Attachment B), which would be well below the County's SLT of 100 lb/day for PM₁₀ during construction activities. Further, due to the highly dispersive nature of particulate matter, a cumulative impact during construction activities would only occur if a project adjacent to the proposed Project undergoes simultaneous grading/earthwork activities and emits significantly greater PM₁₀ emissions than the Project. Because all projects developed within the County would be required to comply with the County Grading Ordinance and SDAPCD Rule 55, this scenario is not anticipated to occur.

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

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

- 3(d) The GPU EIR concluded this impact to be significant and unavoidable. Air quality regulators typically define sensitive receptors as schools (Preschool – 12th Grade), hospitals, resident care facilities, day-care centers, residences, or other facilities that may house individuals with health conditions that would be adversely impacted by changes in air quality. Because the Project proposes residential land uses, the proposed Project would not be considered a point-source of significant operational emissions. The nearest sensitive receptors to the Project site are existing residential dwelling units located adjacent to the Project site boundaries and schools located more than 0.25 mile from the Project site. Nevertheless, the Project would generate construction emissions in the vicinity of sensitive receptors.

Diesel particulate matter (DPM) is the primary toxic air contaminant (TAC) of concern and is generated from fuel consumption in heavy construction equipment. As discussed in response 3(b), the NAAQS and CAAQS would not be exceeded due to Project contributions for both construction and operations. The County's SLTs for human health hazards were developed in support of State and federal ambient air quality strategies that are protective of human health. The Health Risk Assessment performed as part of the Air Quality Assessment (Attachment B) found that the Project construction emissions would not exceed the County's significant cancer health risk threshold of 10 in a million with implementation of Toxics-Best Available Control Technology (T-BACT). Additionally, the Project construction emissions would not exceed the County's significance threshold of 1.0 for chronic health hazard. The T-BACT that would be used by the Project would be the use of USEPA certified Tier 3 and Tier 4 construction equipment with DPF or equivalent for all construction activities in accordance with County PDS requirements. Using Tier 4 construction equipment with DPF would further reduce cancer risks at all receptors surrounding the Project site. It should be noted that even with the assumption that the construction fleet is represented by the average fleet for the year 2023, the impact would not exceed the County's threshold of 10 in a million. The average fleet does include

equipment that is rated to Tier 3 and Tier 4; and as time progresses, more of the construction equipment in the fleet will meet more stringent standards. The risk associated with exposure to diesel particulate from construction of the Project is therefore not significant. Abidance to the County of San Diego Grading Ordinance, SDAPCD Rule 55, and the application of Tier 3 and Tier 4 engines with DPF would reduce localized construction emissions. Further, exposure to construction emissions would be temporary and would not expose sensitive receptors to excessive concentrations of air pollutants. Therefore, the Project would not expose sensitive receptors to an incremental health risk. Construction and operational impacts to sensitive receptors would be less than significant.

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

- 3(e) The GPU EIR concluded this impact to be less than significant. The Project could produce objectionable odors during the construction phases of paving and painting activities, which would require bitumen and solvents from the placement of hot asphalt and architectural coating. Exhaust from construction equipment may also generate odors. However, due to the dispersive nature of odors, these short-term impacts would be fairly short-lived and would not cause objectionable odors affecting a substantial number of people. Furthermore, the Project would be subject to SDAPCD Rule 51, Nuisance Rule, which prohibits emissions of any material that causes nuisance to a considerable number of persons or endangers the comfort, health, or safety of any person. The Project would result in the future development of residential uses, which are not generally associated with the generation of objectionable odors. Thus, the Project would not create objectionable odors affecting a substantial number of people during construction activities or operations.

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

Conclusion

With 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. Feasible mitigation measures contained within the GPU EIR (Air-2.5, Air-2.6, Air-2.7, and Air-2.9) would be applied to the Project.

Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
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4. Biological Resources – Would the Project:

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

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

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

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

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

Discussion

A Biological Resources Letter Report was prepared for the Project by Klutz Biological Consulting, dated October 5, 2023 (Attachment C). The following responses have incorporated the analysis from the report.

4(a) The GPU EIR concluded this impact to be significant and unavoidable. Biological resources on the Project site were evaluated in a Biological Resource Letter Report prepared by Klutz Biological Consulting in October 2023. The site contains Diegan coastal sage scrub, disturbed Diegan coastal sage scrub, and developed land. Eight sensitive species were observed during surveys in 2018 and 2019, including five sensitive plants species – Munz’s sage (*Salvia munzii*), San Diego barrel cactus (*Ferrocactus viridescens*), Palmer’s grappling hook (*Harpagonella palmeri*), ashy spike moss (*Selaginella cinerascens*), San Diego sunflower (*Bahiopsis laciniata*) – and three sensitive wildlife species – California gnatcatcher (*Polioptila californica californica*), coastal cactus wren (*Campylorhynchus brunnicapillus sandiegensis*), and Cooper’s hawk (*Accipiter cooperi*). The Project would impact approximately 4.07 acres of disturbed and undisturbed Diegan

coastal sage scrub habitat which is considered suitable habitat for both California gnatcatcher and coastal cactus wren, and suitable foraging habitat for Cooper's Hawk and other raptor species. The project would also impact six individual San Diego barrel cactus. The project is located within the Unincorporated Land in the Metro-Lakeside-Jamul Segment of the County's South County Multiple Species Conservation Program (MSCP).

As considered by the GPU EIR, Project impacts to sensitive habitat and/or species would be mitigated through ordinance compliance and through implementation of the following mitigation measures: the on-site conservation of 5.73 acres of Diegan coastal sage scrub with an open space easement, implementation of a limited building zone, perimeter fencing, and open space signage, off-site purchase of 0.38-acre of Diegan coastal sage scrub at a County approved habitat mitigation bank, the conservation of two San Diego barrel cactus on-site and the translocation of an additional six San Diego barrel cacti to the on-site open space lot, and breeding season avoidance to prevent brushing, clearing, and/or grading between February 15th and August 31st (see Mitigation Measures BIO-1 through BIO-5 below). Furthermore, the proposed biological open space easement would conserve occupied or suitable habitat for these species including four additional patches of ashy spike moss and 5.73 acres of occupied San Diego sunflower habitat. With implementation of the mitigation measures listed above, the Biological Resource Letter Report determined that potential impacts to candidate, sensitive, or special status species would be less than significant.

As previously discussed, the GPU EIR determined impacts to special status species as significant and unavoidable. The Project impacts were also determined to be potentially significant. However, the proposed Project would incorporate Mitigation Measures BIO-1 through BIO-5 for a less than significant impact with mitigation. Therefore, the Project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

BIO-1: Habitat Conservation

Impacts to 4.07 acres of Diegan coastal sage scrub require mitigation in order to comply with the County's Biological Mitigation Ordinance. Therefore, 5.73 acres of Diegan coastal sage scrub shall be conserved onsite in a biological open space easement and 0.38-acre shall be conserved in a County approved mitigation bank. In order to help conserve the open space, on-site additional protection measures have been incorporated into the project design and these include a limited building zone, perimeter fencing, and open space signage.

BIO-2: Construction Fencing

The limits of Project impacts (including construction staging areas and access routes) shall be clearly delineated with temporary construction fencing, stakes, flags, or markers that shall be installed in a manner that does not impact habitats to be avoided and such that they are clearly visible to personnel on foot and operating heavy equipment. This delineation shall be conducted under the supervision of the County-approved biologist prior to commencement of construction activities and shall remain in place during all construction activities. All temporary fencing shall be shown on grading plans and/or associated construction documents. If work occurs beyond the fenced or demarcated limits of impact, all work shall cease until the problem has been remedied to the satisfaction of the County. Temporary construction fencing, and markers shall be maintained in good repair until the completion of project construction and removed upon Project completion.

BIO-3: San Diego Barrel Cactus Conservation and Revegetation

The Project shall salvage and translocate six San Diego barrel cactus. The salvage and reestablishment of these cacti is fully detailed in a site-specific revegetation plan (Attachment F to the Biological Resources Letter Report). Additionally, the landscape plan for the Project shall stipulate that Project landscaping shall not include exotic plant species listed on the California Invasive Plant Council's (Cal-IPC) "Invasive Plant Inventory" list.

BIO-4: Breeding Season Avoidance

Diegan coastal sage scrub habitat could provide nesting habitat for bird species such as the California gnatcatcher, coastal cactus wren, and other birds protected under the Migratory Bird Treaty Act and Fish and Game Code. To mitigate potential impacts to migratory birds, if any construction work is proposed to occur during the County of San Diego bird breeding season (February 1– August 31), a qualified County-approved biologist shall conduct a pre-construction survey no more than three days prior to the proposed activities to determine the presence/absence of nesting raptors and/or other migratory birds to ensure that active nests are not impacted. If active nest(s), are detected, no construction activities should occur until the young have fledged and are no longer returning to the nest(s), as determined by the Project biologist. If no active nests are present, construction activities may commence following concurrence by the U.S. Fish and Wildlife Service and California Department of Fish and Wildlife that the project will not directly or indirectly impact nesting migratory birds and/or raptors.

BIO-5: Siltation and Erosion Control Best Management Practices

Siltation and erosion control best management practices shall be implemented during construction, including boundary silt fencing, gravel bags, fiber rolls, weed-free straw wattles and mulch, and slope stabilization.

- 4(b) The GPU EIR concluded this impact to be significant and unavoidable. Based on the Biological Resource Letter Report, the Project site contains Diegan coastal sage scrub. As detailed in response 4(a) above, no riparian habitat occurs on-site and direct and indirect impacts to sensitive natural communities identified in the Resource Protection Ordinance (RPO), National Community Conservation Planning (NCCP), Fish and Wildlife Code, and Endangered Species Act would be mitigated through ordinance compliance and through implementation of the following mitigation measures: the on-site conservation of 5.73 acres of Diegan coastal sage scrub with an open space easement, implementation of a limited building zone, perimeter fencing, and open space signage, off-site purchase of 0.38-acre of Diegan coastal sage scrub at a County approved habitat mitigation bank, the conservation of two San Diego barrel cactus on-site and the translocation of an additional six San Diego barrel cacti to the on-site open space lot, and breeding season avoidance to prevent brushing, clearing, and/or grading between February 15th and August 31st (refer to Mitigation Measures BIO-1 through BIO-5).

As previously discussed, the GPU EIR determined impacts to riparian habitat and other sensitive natural communities as significant and unavoidable. The Project impacts were also determined to be potentially significant. However, the proposed Project would incorporate Mitigation Measures BIO-1 through BIO-5 for a less than significant impact with mitigation. Therefore, the Project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 4(c) The GPU EIR concluded this impact to be less than significant with mitigation. The proposed Project site and surrounding areas do not contain protected wetlands or waterways under jurisdiction of the U.S. Army Corps of Engineers (USACE), California Department of Fish and Wildlife (CDFW), or the Regional Water Quality Control Board (RWQCB). Furthermore, the Project site does not contain any wetland or waters that are regulated by the County's Resource Protection Ordinance (RPO). The site survey prepared for the Biological Resource Letter Report determined that the Project site is comprised entirely of upland habitat. No mitigation is required.

As previously discussed, the GPU EIR determined impacts to federally protected wetlands as less than significant with mitigation. However, the Project would not result in impacts to protected wetlands for the reasons detailed above. Therefore, the Project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 4(d) The GPU EIR concluded this impact to be significant and unavoidable. The Project site likely provides cover and refugia for wildlife attempting to move between and among the isolated and patchy open space areas that occur within the general project vicinity. However, due to the fairly disturbed nature of more than 50 percent of the habitat onsite and the Project's proximity to the adjacent residential areas, the site likely provides limited cover and refugia for large mammal species. Although the Project site is located in proximity to the Dictionary Hill County Preserve, the site is separated from this open space area by Grand Avenue and intervening residential properties. The Project site does not contain any significant wildlife movement corridors or wildlife nursery sites. Therefore, impacts to wildlife corridors would be less than significant.

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

- 4(e) The GPU EIR concluded this impact to be less than significant. The Project is located within the Unincorporated Land in the Metro-Lakeside-Jamul Segment of the County's South County MSCP. The Project is consistent with the South County MSCP, Biological Mitigation Ordinance (BMO), and RPO because mitigation would be required to compensate for the loss of significant habitat. The Project would not conflict with the provisions of any adopted Habitat Conservation Plan, Natural Communities Conservation Plan, other approved local, regional, or state habitat conservation plan or any other local policies or ordinances that protect biological resources.

As previously discussed, the GPU EIR determined impacts on local policies and ordinances as well as habitat conservation plans and natural community conservation plans as less than significant. As the proposed 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 Biological 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. Mitigation Measures BIO-1 through BIO-5 would be applied to the Project.

Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
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5. Cultural Resources – Would the Project:

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

Discussion

A Cultural Resources Survey Report was prepared for the Project by Laguna Mountain Environmental Inc., dated February 2021 (Attachment D). The following responses have incorporated the analysis from the report.

- 5(a) The GPU EIR concluded this impact to be less than significant with mitigation. Based on an analysis of records and a survey of the property by County approved archaeologist, Andrew Pignolo, it has been determined that there are no impacts to historical resources because none occur within the Project site. The results of the survey are provided in the Cultural Resources Survey Report (Attachment D) prepared by Andrew Pignolo.

As previously discussed, the GPU EIR determined impacts on historic resources to be less than significant with mitigation. The proposed Project determined impacts on historic resources to be less than significant. Therefore, the Project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 5(b) The GPU EIR concluded this impact to be less than significant with mitigation. The Cultural Resources Survey Report identified a portion of the previously recorded resource CA-SDI-8464 within the Project site. The northern section of site CA-SDI-8464 would be directly impacted by construction of the residential lots. During the archaeological field survey conducted for the Cultural Resources Survey Report, sparse artifacts associated with CA-

SDI-8464 were identified within the Project site. Most of the cultural material associated with the site appears to have been surface collected during a previous testing program in 2009. Because the portion of CA-SDI-8464 within the Project site has been tested and most of the cultural material has been recovered during this testing, this portion of the site no longer remains a significant resource. Based on minimal archaeological evidence identified within the project area during the survey, it was determined that the portion of this site located within the Project is not a significant resource pursuant to the State CEQA Guidelines and the County of San Diego Guidelines. However, the destruction of site CA-SDI-8464 by Project grading could uncover buried or unidentified components of this site, which would result in significant impacts. Therefore, cultural resource monitoring by archaeological and Native American monitors during construction excavation and grading of native soils is required to ensure that potentially buried features are not impacted in accordance with GPU EIR mitigation measure Cul-2.5.

Although Assembly Bill 52 does not apply to this Project, tribes who have requested to be noticed of projects subject to Assembly Bill 52 were contacted on September 6, 2019. Two tribes (Jamul Indian Village and Viejas Band of Kumeyaay Indians) requested consultation. During consultation, both tribes requested that monitoring be made a condition of approval and that a Kumeyaay Native American monitor be a part of the monitoring program.

As considered by the GPU EIR, potential impacts to cultural resources would be mitigated through ordinance compliance and through implementation of the following mitigation measures: Treatment Agreement and Preservation Plan, grading monitoring under the supervision of a County-approved archaeologist and a Native American monitor and conformance with the County's Cultural Resource Guidelines if resources are encountered (GPU EIR mitigation measure Cul-2.5). The Project would be conditioned with archaeological and tribal monitoring (Cul-2.5) that includes the following requirements:

Pre-Construction

Contract with a County approved archaeologist and Luiseno Native American monitor to perform archaeological monitoring and a potential data recovery program during all earth-disturbing activities. The Project Archaeologist and Luiseno Native American monitor shall perform the monitoring duties before, during and after construction.

Pre-construction meeting to be attended by the Project Archaeologist and Kumeyaay and Luiseno and Kumeyaay Native American monitor (Native American monitor) to explain the monitoring requirements.

Construction

Monitoring. Both the Project Archaeologist and Luiseno Native American monitor are to be onsite during earth disturbing activities. The frequency and location of monitoring of native soils would be determined by the Project Archaeologist in consultation with the Luiseno Native American monitor. Both the Project Archaeologist and Luiseno Native American monitor would evaluate fill soils to ensure that they are negative for cultural resources

If cultural resources are identified:

- Both the Project Archaeologist and Luiseno Native American monitor have the authority to divert or temporarily halt ground disturbance operations in the area of the discovery.

- The Project Archaeologist shall contact the County Archaeologist and the culturally-affiliated tribes as identified in the Treatment Agreement and Preservation Plan at the time of discovery.
- All ground disturbance activities within 100 feet of the discovered cultural resources shall be halted until a meeting is convened between the developer, the project archaeologist, tribal monitor(s), and the tribal representative(s) to discuss the significance of the find. Optionally, the County Archaeologist may attend the meeting to discuss the significance of the find.
- All ground disturbance activities within 100 feet of the discovered cultural resources shall be halted until a meeting is convened between the developer, the project archaeologist, tribal monitor(s), and the tribal representative(s) to discuss the significance of the find. Optionally, the County Archaeologist may attend the meeting to discuss the significance of the find.
- Construction activities shall not resume in the area of discovery until an agreement has been reached by all parties as to appropriate mitigation. Work shall be allowed to continue outside of the buffer area and shall be monitored. Isolates and non-significant deposits shall be minimally documented in the field. The isolates and non-significant deposits shall be reburied onsite as identified in the Treatment Agreement and Preservation Plan.
- Treatment and avoidance of the newly discovered resources shall be consistent with the Treatment Agreement and Preservation Plan (CUL-2) entered into with the appropriate tribes. This may include avoidance of the cultural resources through project design, in-place preservation of cultural resources located in native soils and/or re-burial on the Project property so they are not subject to further disturbance in perpetuity.
- If cultural resources are identified, one or more of the following treatments, in order of preference, shall be employed:
 - Preservation in place of the Cultural Resources, if feasible. Preservation in place means avoiding the resources, leaving them in place where they were found with no development affecting the integrity of the resources.
 - Reburial of the resources on the project property. The measures for reburial shall include, at least, the following:
 - Measures and provisions to protect the future reburial area from any future impacts in perpetuity.
 - Reburial shall not occur until all legally required cataloging and basic recordation have been completed, with an exception that sacred items, burial goods and Native American human remains are excluded.
 - Any reburial process shall be culturally appropriate.
 - Listing of contents and location of the reburial shall be included in the confidential appendix of the Monitoring Report.
 - The Monitoring Report shall be filed with the County under a confidential cover and is not subject to Public Records Requests.
 - If preservation in place or reburial is not feasible, a Research Design and Data Recovery Program (Program) shall be prepared by the Project Archaeologist in consultation with the Tribe and Luiseno Native American Monitor and approved by the County Archaeologist prior to implementation. There shall be no destructive or invasive testing on sacred items, burial goods and Native American human remains. Results concerning finds of any inadvertent discoveries shall be included in the Monitoring Report.

- Pursuant to Calif. Pub. Res. Code Section 21083.2(b) avoidance is the preferred method of preservation for archaeological resources and cultural resources. If the landowner and the Tribe(s) cannot agree on the significance or the mitigation for the archaeological or cultural resources, these issues would be presented to the Planning & Development Services Director for decision. The Planning & Development Services Director shall make the determination based on the provisions of the California Environmental Quality Act with respect to archaeological resources, recommendations of the project archeologist and shall take into account the cultural and religious principles and practices of the Tribe.

Human Remains.

- The Property Owner or their representative shall contact the County Coroner and the PDS Staff Archaeologist.
- Upon identification of human remains, no further disturbance shall occur in the area of the find until the County Coroner has made the necessary findings as to origin. If the human remains are to be taken offsite for evaluation, they shall be accompanied by the Native American monitor.
- If the remains are determined to be of Native American origin, the Most Likely Descendant (MLD), as identified by the Native American Heritage Commission (NAHC), shall be contacted by the Property Owner or their representative in order to determine proper treatment and disposition of the remains.
- The immediate vicinity where the Native American human remains are located is not to be damaged or disturbed by further development activity until consultation with the MLD regarding their recommendations as required by PRC Section 5097.98 has been conducted.
- PRC Section 5097.98, CEQA Section 15064.5 and Health & Safety Code Section 7050.5 shall be followed in the event that human remains are discovered.

Rough Grading

Monitoring Report. Upon completion of Rough Grading, a monitoring report shall be prepared identifying whether resources were encountered. A copy of the monitoring report shall be provided to the South Coastal Information Center and any culturally-affiliated tribe who requests a copy. The report shall detail all cultural artifacts and deposits discovered during monitoring and the anticipated time schedule for completion of the reburial and/or repatriation phase of the monitoring.

Final Grading

- Final Report.
 - A final report shall be prepared substantiating that earth-disturbing activities are completed and whether cultural resources were encountered. A copy of the final report shall be submitted to the South Coastal Information Center, and any culturally-affiliated tribe who requests a copy.
- Cultural Material Conveyance
 - The final report shall include evidence that all Native American cultural materials have been conveyed, in order of preference, as follows:
 - Evidence that all prehistoric materials have been reburied onsite.
 - Evidence that all prehistoric materials have been repatriated to a Native American group of appropriate tribal affinity.

- The final report shall include evidence that all historic materials have been curated at a San Diego curation facility that meets federal standards per 36 CFR Part 79.

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

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

As previously discussed, the GPU EIR determined impacts on unique geologic features as less than significant. As the Project would have a less-than-significant impacts 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.

- 5(d) The GPU EIR concluded this impact to be less than significant with mitigation. A review of the County's Paleontological Resources Maps and data on San Diego County's geologic formations indicates that the Project is located on geological formations that contain unique paleontological resources. Proposed grading would include 4,200 cubic yards of excavation which is more than 2,500 cubic yards of excavation which has the potential to impact fossil deposits. As such, GPU EIR mitigation measure Cul-3.1 would be required.

Accordingly, grading monitoring by the Project contractor would be a condition of Project approval. If paleontological resources are identified during Project grading activities, then a qualified Paleontologist would be engaged.

As considered by the GPU EIR, potential impacts to paleontological resources would be mitigated through ordinance compliance and through implementation of GPU EIR mitigation measure Cul-3.1, including the following:

- Grading monitoring
- Conformance with the County's Paleontological Resource Guidelines if resources are encountered.

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

- 5(e) The GPU EIR concluded this impact to be less than significant with mitigation. Based on an analysis of records and archaeological surveys of the property, it has been determined that the Project site does not include a formal cemetery or any archaeological resources that might contain interred human remains. Also refer to response 5(b) above for a complete description of GPU EIR mitigation measure 2.5, which addresses inadvertent discoveries.

As previously discussed, the GPU EIR determined impacts to human remains as less than significant with mitigation. The proposed Project determined impacts to human remains as less than significant. Therefore, the Project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

Conclusion

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

1. No peculiar impacts to the Project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. Feasible mitigation measures contained within the GPU EIR (Cul-2.5 and Cul-3.1), would be applied to the Project.

Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
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6. Energy Use – Would the Project:

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|---|--------------------------|--------------------------|--------------------------|
| 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 GHGs, while protecting public health and contributing to a more sustainable environment. GPU 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 GHGs. Goal COS-17 promotes sustainable solid waste management. Policies COS-17.1 and COS-17.5 would support this goal by reducing GHG emissions through waste reduction techniques and methane recapture. The analysis below specifically analyzes the energy use of the Project.

- 6(a) The Project would increase the demand for electricity and natural gas at the Project site, and gasoline consumption in the Project area during construction and operation relative to existing conditions. CEQA requires mitigation measures to reduce “wasteful, inefficient and unnecessary” energy usages (PRC Section 21100, subdivision [b][3]). Neither the law nor the State CEQA Guidelines establish criteria that define wasteful, inefficient, or unnecessary use. Compliance with the California Code of Regulations 2022 Title 24 Part 6 Building Code and 2022 Energy Efficiency Standards would result in highly energy-

efficient buildings. However, compliance with building codes does not adequately address all potential energy impacts during construction and operation. It can be expected that energy consumption, outside of the building code regulations, would occur through the transport of construction materials to and from the site during the construction phase and the use of personal vehicles by residents during operation.

Grading and Construction

During the grading and construction phases of the Project, the primary energy source utilized would be petroleum from construction equipment and vehicle trips. To a lesser extent, electricity would also be consumed for the temporary electric power for as-necessary lighting and electronic equipment. Activities including electricity would be temporary and negligible; therefore, electricity use during grading and construction would not result in wasteful, inefficient, or unnecessary consumption of energy. Any natural gas that may be consumed as a result of the Project construction would be temporary and negligible and would not have an adverse effect; therefore, natural gas used during grading and construction would also not result in wasteful, inefficient, or unnecessary consumption of energy.

The energy demand for Project construction would be temporary and is not anticipated to require additional capacity or increase peak or base period demands for electricity or other forms of energy. Construction equipment use and associated energy consumptions would be typical of that associated with the construction of residential projects of this size in a semi-rural setting. Additionally, the Project is consistent with the GPU and Zoning Ordinance. Thus, the Project's energy consumption during the grading and construction phase would not be considered wasteful, inefficient, or unnecessary.

Operational

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

Over the lifetime of the proposed Project, fuel efficiency of vehicles is expected to increase as older vehicles are replaced with newer, more efficient models. As such, the amount of petroleum consumed as a result of vehicle trips to and from the Project site during operation would decrease over time. State and Federal regulations regarding standards for vehicles (e.g., Advanced Clean Cars Program, CAFÉ Standards) are designed to reduce wasteful, unnecessary, and inefficient use of fuel. The coupling of various State policies and regulations such as the Zero-Emission Vehicles Mandate and Senate Bill (SB) 350 would result in the deployment of electric vehicles (EVs) which would be powered by an increasingly renewable electrical grid. The Project would require future residences to be constructed as EV Ready per the California Green Building Standards (CALGreen) Code Tier 2, increasing the ability of future residents to use EVs. Therefore, the Project would not be expected to result in wasteful, inefficient or unnecessary mobile energy usage throughout project operations beyond what was anticipated in the GPU EIR.

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

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

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

- Compliance with County's Water Conservation in Landscaping Ordinance, demonstrating a 40-percent reduction in outdoor use which would reduce energy required for water conveyance;
- Compliance with the California Code of Regulations 2022 Title 24 Part 6 Building Code. Compliance with Title 24 results in highly energy-efficient buildings.
- Each proposed unit would be constructed as EV Ready pursuant to CALGreen Tier 2, including the installation of necessary electrical components to support future charging station;
- Each proposed unit would be constructed as an all-electric structure, with no natural gas appliances or natural gas plumbing, as required by Project-specific Mitigation measure GHG-1.

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

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

Conclusion

With 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
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- | | | | |
|---|--------------------------|--------------------------|--------------------------|
| 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

The following technical study was prepared for the Project:

- Geological Reconnaissance prepared by Advanced Geological Solutions, Inc., dated August 5, 2022 (Attachment E).
- Steep Slope Exhibit prepared by Walsh Engineering & Surveying, Inc., dated May 22, 2023 (Attachment F).

The following responses have incorporated the analysis from the report.

- 7(a)(i) The GPU EIR concluded this impact to be less than significant. The Project is not located in a fault rupture hazard zone identified by the Alquist-Priolo Earthquake Fault Zoning Act, Special Publication 42, Revised 1997, Fault-Rupture Hazard Zones in California, or located on any known active, potentially active, or inactive fault traces. The nearest mapped active fault is the Newport-Inglewood-Rose Canyon Fault Zone located approximately 9 miles west of the Project site. Segments of the potentially active La Nacion Fault Zone are located approximately 3.5 miles west of the Project site. Therefore, the Geological Reconnaissance determined the potential for surface fault rupture at the site to be very low.
- 7(a)(ii) The GPU EIR concluded this impact to be less than significant. To ensure the structural integrity of all buildings and structures, the Project must conform to the Seismic Requirements as outlined within the California Building Code. In addition, a geotechnical report with proposed foundation recommendation would be required to be approved before the issuance of a building permit. Therefore, compliance with the California Building Code and the County Building Code would ensure that the Project would not result in a significant impact.
- 7(a)(iii) The GPU EIR concluded this impact to be less than significant. The Project site is not within a “Potential Liquefaction Area” as identified by the County Guidelines for Determining Significance for Geologic Hazards. This indicates that liquefaction potential at the site is low. Additionally, the site is not underlain by poor artificial fill nor is it located

within a floodplain. In addition, the Geological Reconnaissance determined the potential for liquefaction to be negligible given the very dense bedrock underlying the site and the lack of shallow groundwater. Therefore, impacts from the exposure of people or structures to adverse effects from a known area susceptible to ground failure, including liquefaction, would be less than significant. To ensure no impacts would occur, a geotechnical report would be required prior to ground disturbance activities as a standard condition of approval. The GPU EIR identified the standard condition of a geotechnical report within Section 2.6.3.1, Federal, State and Local Regulations and Existing Regulatory Processes, Liquefaction.

Conditions of Approval

The following list includes the Project conditions of approval:

Geotechnical Report

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

7(a)(iv) The GPU EIR concluded this impact to be less than significant. The site is located within a "Landslide Susceptibility Area" as identified in the County Guidelines for Determining Significance for Geologic Hazards and is considered to be Generally Susceptible. The Project site is sloping at shallow to steep slope ratios and is underlain by volcanic bedrock that is not considered to be generally susceptible to landslides. In addition, no geomorphic evidence of landslides was observed at the site and there are no mapped or known landslides onsite or in the close vicinity of the Project. Therefore, the Geological Reconnaissance determined the potential for landsliding at the Project site is low.

As previously discussed, the GPU EIR determined less than significant impacts from exposure to seismic-related hazards and soil stability. The proposed Project would have a less than significant impact with the incorporation of Project conditions for a geological soils report, as a standard condition of approval. The GPU EIR identified the standard condition of a geotechnical report within section 2.6.3.1, Federal, State and Local Regulations and Existing Regulatory Processes, Liquefaction. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

7(b) The GPU EIR concluded this impact to be less than significant. The soils on-site have been identified as alfisols that have a soil erodibility rating of severe. However, the Project would not result in substantial soil erosion or the loss of topsoil because the Project would be required to comply with the Watershed Protection Ordinance (WPO) and Grading Ordinance, which would ensure that the Project would not result in any unprotected erodible soils, would not significantly alter existing drainage patterns, and would not develop steep slopes. Additionally, the Project would be required to implement best management practices (BMPs) for siltation and erosion control per Mitigation Measure BIO-5 and the Storm Water Pollution Prevention Plan (SWPPP; see response 10[a]).

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

- 7(c) The GPU EIR concluded this impact to be less than significant. As indicated in response 7(a)(iv), the site is located within a “Landslide Susceptibility Area” as identified in the County Guidelines for Determining Significance for Geologic Hazards and is considered to be Generally Susceptible. The Project site is relatively flat to moderately sloped and risks associated with ground movement hazards are low. In order to assure that any proposed buildings are adequately supported, a Soils Engineering Report is required as part of the grading and building permit process. This Report would evaluate the strength of underlying soils and make recommendations on the design of building foundation systems. The Soils Engineering Report must demonstrate that a proposed building meets the structural stability standards required by the California Building Code. The report must be approved by the County prior to the issuance of a building permit. With this standard requirement, impacts would be less than significant.

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

- 7(d) The GPU EIR determined impacts from expansive soils to be less than significant. The Project site is not underlain by expansive soils; however, as a standard project condition, the Project would be required to submit a Soils Engineering Report by a California Certified Engineering Geologist prior to grading. The soils report is required to include a surficial stability analysis with design recommendations. All geotechnical recommendations provided in the soils report would be followed during grading and construction of the Project.

As previously discussed, the GPU EIR determined impacts from expansive soils to be less than significant. As the Project would have a less-than-significant impact with the incorporation of standard project conditions, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 7(e) The GPU EIR concluded this impact to be less than significant. The Project would rely on sewer service provided by the San Diego County Sanitation District and would not propose septic tanks or alternative wastewater disposal systems. As such, the Project would not place septic tanks or alternative wastewater disposal systems on soils incapable of adequately supporting the tanks or system. As such, the Project would not place septic tanks or alternative wastewater disposal systems on soils incapable of adequately supporting the tanks or system.

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

Conclusion

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

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

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

8. Greenhouse Gas Emissions – Would the Project:

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

Discussion

A Greenhouse Gas Analysis was prepared for the Project by Julia Wilson, Air Quality and Greenhouse Gas Specialist, dated August 9, 2023 (Attachment G). The following responses have incorporated the analysis from the report.

- 8(a) The GPU EIR concluded this impact to be less than significant with mitigation. Amendments to Section 15064.4 of the CEQA Guidelines were adopted to assist lead agencies in determining the significance of the impacts of GHG emissions. Section 15064.4 specifies that a lead agency “shall make a good-faith effort, based to the extent possible on scientific and factual data, to describe, calculate or estimate the amount of greenhouse gas emissions resulting from a project.” Section 15064.4 also provides lead agencies with the discretion to determine whether to assess those emissions quantitatively or to rely on a qualitative analysis or performance-based standards.

The County does not currently have locally adopted screening criteria or GHG thresholds. For the determination of the significance of the project’s GHG emissions, the County has determined that the land use development project level thresholds and guidance adopted by the Bay Area Air Quality Management District (BAAQMD) on April 20, 2022 and revised on April 4, 2023 are appropriate. BAAQMD’s GHG emissions thresholds are based on the approach endorsed by the California Supreme Court in *Center for Biological Diversity v. Department of Fish & Wildlife* (2015) (62 Cal.4th 204), which evaluates a project based on its effect on California’s efforts to meet the State’s long term climate goals. As the Supreme Court held in that case, a project that would be consistent with meeting those goals can be found to have a less than significant impact on climate change under CEQA. If a project would contribute its “fair share” of what will be required to achieve those long-term climate goals, then a reviewing agency can find that the impact will not be significant because the project will help to solve the problem of global climate change (62 Cal.4th 220–223). Applying this approach, BAAQMD has analyzed what will be required of new land use development projects to achieve California’s long-term climate goal of carbon neutrality by 2045. BAAQMD has found, based on this analysis, that a new land use development

project built today needs to incorporate the following design elements to do its “fair share” of implementing the goal of carbon neutrality by 2045 (BAAQMD 2023):

Projects must include, at a minimum, the following project design elements:

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

Justification for the use of these thresholds to determine significance under CEQA is contained in the Justification Report – CEQA Thresholds for Evaluating the Significance of Climate Impacts (BAAQMD 2023).

Utilizing the California Emissions Estimator Model (CalEEMod) model, which is the model commonly used to evaluate GHG impacts in CEQA, the Project is estimated to generate 295 per year during operations. Construction emissions are estimated to result in 19 MTCO_{2e} per year when amortized over a 30-year timeframe (consistent with methodology from the SCAQMD). With construction, annual project GHG emissions were estimated to be 314 MTCO_{2e} and would be reduced by 38 MTCO_{2e} when accounting for sustainability measures, resulting in a total of 276 MTCO_{2e}.

Implementation of the proposed Project would result in GHG emissions from both construction and operational activities. The Project would generate 316 metric tons of carbon dioxide equivalent (MTCO_{2e}) during construction totaling 11 MTCO_{2e} when amortized over a 30-year project lifetime. The Project would additionally generate 105 MTCO_{2e}/year during the first year of Project operation (2024). Total emissions would be 116 MTCO_{2e}/year.

The Project would not adhere to the project design features recommended by BAAQMD to prohibit on-site natural gas infrastructure or meet the most recent Tier 2 requirements of the CALGreen Code with respect to EV charging. The Project has been screened out for VMT impacts given that the Project is anticipated to generate approximately 100 trips per day, which is below OPR’s and the County’s recommended 110 trips per day threshold of significance. Nevertheless, because the Project would allow for on-site natural gas and would not align with the Tier 2 EV charging requirements of the CALGreen Code, the unmitigated Project would result in cumulatively considerable contribution of GHG

emissions. Therefore, the Project would be required to incorporate Mitigation Measure GHG-1 and GHG-2 to reduce its contribution of GHG emissions. Implementation of these project design features would demonstrate consistency with BAAQMD's thresholds of significance, which would indicate that the project is doing its "fair share" in assisting the state in meeting its long-term goal of achieving carbon neutrality by 2045.

Mitigation Measures GHG-1 and GHG-2 are consistent with County General Plan mitigation measures CC-1.1, CC-1.11, CC-1.17, which encourage incentives for energy efficient development, implementation of the Ordinance Relating to Water Conservation for Landscaping, and implementation of a construction waste recycling program. The Project is consistent with the land uses evaluated in the General Plan, which analyzed the impacts of residential uses on the project site.

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

GHG-1: Eliminate Natural Gas Infrastructure

The Project shall eliminate all on-site natural gas infrastructure for all land uses.

GHG-2: Electric Vehicle Charging Standards

Adherence to the most recent Tier 2 requirements of Part 11 of the Title 24 California Green Building Standards (CALGreen) Code electric vehicle (EV) charging standards (a dedicated 208/240-volt branch circuit installed as required by Section 4.106.41 of the CALGreen Code.

8(b) The GPU EIR concluded this impact to be less than significant. As described above, the Project would not result in a cumulatively considerable contribution to global climate change with implementation of Mitigation Measures GHG-1 and GHG-2. As such, the Project would be consistent with County goals and policies included in the County General Plan that address GHG reductions.

The Project is consistent with the County's General Plan land use designation of Semi-Rural Residential (SR-1). Through its goals, policies, and land use designations, the County's General Plan aims to reduce countywide GHG emissions. The Project would result in a less than significant impact from vehicle miles travelled. Therefore, the Project would not conflict with SANDAG's recently adopted San Diego Forward: the 2021 Regional Plan, which includes a Sustainable Communities Strategy (SCS) as required by SB 375. Because the Project's proposed land uses are consistent with the County's General Plan land use designation, the Project would not conflict with the General Plan or SANDAG's Regional Plan and would not result in growth beyond what was assumed in the regional growth forecasts. Therefore, the Project's impacts related to GHG emissions would be less than significant.

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

Conclusion

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

1. No peculiar impacts to the Project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. No mitigation measures contained 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
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9. Hazards and Hazardous Materials – Would the Project:

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|---|--------------------------|--------------------------|--------------------------|
| a) Create a significant hazard to the public or the environment through the routine transport, storage, use, or disposal of hazardous materials or wastes or through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| c) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, or is otherwise known to have been subject to a release of hazardous substances and, as a result, would it create a significant hazard to the public or the environment? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| d) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| e) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

g) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

h) Propose a use, or place residents adjacent to an existing or reasonably foreseeable use that would substantially increase current or future resident's exposure to vectors, including mosquitoes, rats or flies, which are capable of transmitting significant public health diseases or nuisances?

Discussion

9(a) The GPU EIR concluded this impact to be less than significant. Project construction would involve the transport of gasoline and other petroleum-based products associated with construction equipment. These materials are considered hazardous as they could cause temporary localized soil and water contamination. Incidents of spills or other localized contamination could occur during refueling, operation of machinery, undetected fluid leaks, or mechanical failure. However, all storage, handling, and disposal of these materials are regulated by the California Department of Toxic Substances Control, the USEPA, and the San Miguel Fire Protection District.

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

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

As previously discussed, the GPU EIR determined impacts from transport, use and disposal of hazardous materials and accidental release of hazardous materials to be less than significant. The proposed Project would have a less-than-significant impact with standard project conditions for structure and debris removal, and lead and asbestos surveys. The Project conditions are consistent with General Plan Policy S-11.4 as analyzed in the GPU EIR. Thus, for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 9(b) The GPU EIR concluded this impact to be less than significant. The Project is not located within 0.25 mile of an existing or proposed school. The closest school is Kempt Elementary approximately 0.9 miles from the project site. The Project does not propose any hazardous emissions or handling of hazardous or acutely hazardous materials or substances. Furthermore, the Project is required to comply with applicable regulations pertaining to hazardous waste to ensure that impacts related to hazardous emissions and schools is less than significant.

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

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

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

- 9(d) The GPU EIR concluded this impact to be less than significant with mitigation. The Project is not located within an Airport Land Use Compatibility Plan (ALUCP), an Airport Influence Area, or a Federal Aviation Administration Height Notification Surface. The Project is not located within 2 miles of an airport. The closest airport is Gillespie Field, which is approximately 7.2 miles north of the Project site. Furthermore, the Project does not propose construction of any structure equal to or greater than 150 feet in height that would constitute a safety hazard to aircraft and/or operations from an airport or heliport. Therefore, the Project would not constitute a safety hazard for people residing or working in the Project area.

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

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

- 9(f)(i) OPERATIONAL AREA EMERGENCY PLAN AND MULTI-JURISDICTIONAL HAZARD MITIGATION PLAN:

The GPU EIR concluded this impact to be less than significant with mitigation. The Project would not interfere with this plan because it would not prohibit subsequent plans from

being established or prevent the goals and objectives of existing plans from being carried out.

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

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

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

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

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

9(g) The GPU EIR concluded this impact as significant and unavoidable. The Project is within the Local Responsibility Area (LRA) and within the Urban-Wildlife Interface Zone. However, the Project would not expose people or structures to a significant risk of loss, injury or death involving wildland fires because the Project would comply with the regulations relating to emergency access, water supply, and defensible space specified in the Consolidated Fire Code for the 16 Fire Protection Districts in San Diego County. Implementation of these fire safety standards would occur during the grading permit and/or building permit process. In addition, a fire hydrant would be constructed on the west of Grand Avenue between Eucalyptus Street and Date Street. Therefore, based on the location of the Project and review of the Project by County staff, through compliance with the Consolidated Fire Code and through compliance with the San Diego County Fire Authority, the Project is not anticipated to expose people or structures to a significant risk of loss, injury, or death involving hazardous wildland fires. Moreover, the Project would not contribute to a cumulatively considerable impact, because all past, present, and future projects in the surrounding area are required to comply with the Consolidated Fire Code.

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

9(h) The GPU EIR concluded this impact as less than significant. The Project does not involve or support uses that allow water to stand for a period of 72 hours (3 days) or more (e.g.,

artificial lakes, agricultural irrigation ponds). Also, the Project does not involve or support uses that would produce or collect animal waste, such as equestrian facilities, agricultural operations (chicken coops, dairies etc.), solid waste facility or other similar uses. Therefore, the Project would not substantially increase exposure to vectors, including mosquitoes, rats, or flies.

As previously discussed, the GPU EIR determined less than significant impacts with mitigation from vectors. The proposed Project would also have a less-than-significant impact. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

Conclusion

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

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

Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
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10. Hydrology and Water Quality – Would the Project:

a) Violate any waste discharge requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Is the project tributary to an already impaired water body, as listed on the Clean Water Act Section 303(d) list? If so, could the project result in an increase in any pollutant for which the water body is already impaired?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Could the proposed project cause or contribute to an exceedance of applicable surface or groundwater receiving water quality objectives or degradation of beneficial uses?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- | | | | |
|---|--------------------------|--------------------------|--------------------------|
| e) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| f) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| g) Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| h) Provide substantial additional sources of polluted runoff? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| i) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map, including County Floodplain Maps? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| j) Place within a 100-year flood hazard area structures which would impede or redirect flood flows? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| k) Expose people or structures to a significant risk of loss, injury or death involving flooding? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| l) Expose people or structures to a significant risk of loss, injury or death involving flooding as a result of the failure of a levee or dam? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| m) Inundation by seiche, tsunami, or mudflow? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Discussion

The following Technical Studies were prepared for the Project related to hydrology and water quality:

- Priority Development Project (PDP) Stormwater Quality Management Plan (SWQMP) prepared by Walsh Engineering & Surveying, Inc. dated October 4, 2023 (Attachment H).
- CEQA Drainage Study prepared by Walsh Engineering & Surveying, Inc. dated January 2024 (Attachment I).

The following responses have incorporated the analysis from the report.

10(a) The GPU EIR concluded this impact to be significant and unavoidable. Development projects have the potential to generate pollutants during both the construction and operational phases. For the Project to avoid potential violations of any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality, storm water management plans are prepared for both phases of the development Project (construction and operation).

During the construction phase, the Project would prepare and implement a SWPPP. The SWPPP would implement the following typical erosion control BMPs: hydraulic stabilization hydroseeding on disturbed slopes; use of mulch, straw, wood chips, and soil application on disturbed flat areas, energy dissipater outlet protection for water velocity control; fiber rolls, gravel and sand bags, storm drain inlet protection for sediment control; stabilized construction entrance for offsite tracking of sediment; and measures to control materials management and waste management. The SWPPP would be prepared in accordance with Order No. 2009-009-DWQ, National Pollutant Discharge Elimination System (NPDES) Order CAS000002 Construction General Permit adopted by the State Water Resources Control Board (SWRCB) on September 2, 2009.

During the post-construction phase, as outlined in the PDP SWQMP, the Project would implement site design, and source control BMPs to prevent potential pollutants from entering storm water runoff. The PDP SWQMP has been prepared in accordance with the County of San Diego BMP Design Manual (2019) and SDRWQCB Order No. R9-2013-0001 Municipal Separate Storm Sewer System (MS4) permit (2013), as adopted by the RWQCB on May 8, 2013.

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

As previously discussed, the GPU EIR determined significant and unavoidable impacts to water quality standards and requirements. However, the proposed Project would have a less-than-significant impact to water quality standards through ordinance compliance as detailed above. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 10(b) The GPU EIR concluded this impact to be significant and unavoidable. The Project site lies in the La Nacion (909.12) hydrologic unit within the Sweetwater hydrologic unit. According to the Clean Water Act section 303(d) list, a portion of this watershed is impaired for Enterococcus, Fecal coliform, Phosphorus, Selenium, Total dissolved solids, Total nitrogen, and Toxicity. The Project could contribute to release of these pollutants; however, the Project would comply with the WPO and implement site design measures and source control BMPs to prevent a significant increase of pollutants to receiving waters.

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

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

As previously discussed, the GPU EIR determined significant and unavoidable impacts to water quality standards and requirements and groundwater supplies and recharge.

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

- 10(d) The GPU EIR concluded this impact to be significant and unavoidable. The Project is within the service area of the Helix Water District that obtains water from surface reservoirs and other imported sources. The Project would not use groundwater for its potable water supply. The Project would increase demand for potable water and non-potable water for irrigation. Given that Water Management Plans use projections in local planning documents and that the project is consistent with the County General Plan land use designation and zoning, potable water demands of the Project (that would include groundwater) would be similar to those accounted for in Helix Water District's 2020 Urban Water Management Plan and 2020 Water Shortage Contingency Plan. Consequently, significant impacts to groundwater resources are not anticipated with development of the project. In addition, the Project does not involve operations that would interfere substantially with groundwater recharge. In addition, the Project does not involve operations that would interfere substantially with groundwater recharge.

As previously discussed, the GPU EIR determined significant and unavoidable impacts to groundwater supplies and recharge. However, the proposed Project would have a less-than-significant impact to groundwater recharge. Therefore, the 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 Project would not result in substantial erosion or siltation on or off-site because storm water quality management plans are prepared for both the construction and post-construction phases of the development Project. During the construction phase, the Project would prepare and implement a SWPPP. The SWPPP would implement the following typical erosion control BMPs: hydraulic stabilization hydroseeding on disturbed slopes; mulch, straw, wood chips, and soil application on disturbed flat areas, energy dissipater outlet protection for water velocity control; fiber rolls, gravel and sand bags, storm drain inlet protection for sediment control; stabilized construction entrance for offsite tracking of sediment; and measures to control materials management and waste management.

Preconstruction the drainage pattern is generally northeast to southwest with an average slope of 25 percent. The drainage through the property exits the site at the westerly and southerly property lines in a sheet flow condition. Post construction drainage would maintain the same drainage patterns as the pre-developed condition. The increase in flow rate for the post developed condition would be mitigated by the use of tree wells with 8 inch of flood storage ponding for detention on each of the lots (except for Lot 6). The tree well on Lot 7 is used for both Lots 6 and 7, and all tree wells adequately mitigate the impacts of the development.

The SWPPP would be prepared in accordance with Order No. 2009-009-DWQ, NPDES Order CAS000002 CGP adopted by the SWRCB on September 2, 2009. During the post-construction phase, as outlined in the PDP SWQMP dated June 1, 2020, the Project would implement site design and source control BMPs to prevent potential pollutants from entering storm water runoff. The SWQMP has been prepared in accordance with the

County of San Diego BMP Design Manual (2019) and SDRWQCB Order No. R9-2013-0001 Municipal Separate Storm Sewer System (MS4) permit (2013), as adopted by the RWQCB on May 8, 2013.

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

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

- 10(f) The GPU EIR concluded this impact to be less than significant with mitigation. The Preliminary Drainage Study prepared by Walsh Surveying and Engineering, dated January 2024, determined that the proposed Project would not alter the existing drainage pattern in a manner which would result in flooding on- or off-site. See response 10(e) for further discussion on on-site drainage patterns.

As previously discussed, the GPU EIR determined impacts to flooding as less than significant with mitigation. The proposed Project would have a less-than-significant impact with regards to flooding with design features and improvements consistent with GPU mitigation measures (Hyd-1.2 through Hyd-1.5). Therefore, the 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(g) The GPU EIR concluded this impact to be less than significant with mitigation. Pursuant to the Preliminary Drainage Study prepared for the proposed Walsh Surveying and Engineering dated January 2024, and as described above in 10(e) and 10(f), the proposed Project would maintain the existing pre-development on-site drainage pattern. Post development drainage would be at or below pre-development rates of discharge.

As previously discussed, the GPU EIR determined impacts to exceed capacity of stormwater systems as less than significant with mitigation. The proposed Project would have a less-than-significant impact with regards to exceeding the capacity of stormwater systems with GPU EIR mitigation measures Hyd-1.2 through Hyd-1.5. Therefore, the 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(h) The GPU EIR concluded this impact to be significant and unavoidable. The Project has the potential to generate pollutants; however, site design measures and source control BMPs as indicated in response 10(a) would be employed such that potential pollutants would be reduced to the maximum extent practicable.

As previously discussed, the GPU EIR determine impacts to water quality standards and requirements as significant and unavoidable. However, the proposed Project would have a less-than-significant impact to water quality standards with the implementation of project conditions listed in 10(a). The conditions are consistent with the GPU EIR mitigation

measures Hyd-1.2 through Hyd-1.5. Therefore, the Project would not be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

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

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

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

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

- 10(k) The GPU EIR concluded this impact to be less than significant with mitigation. The Project does not propose development within any identified special flood hazard area. 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 proposed Project would have a less-than-significant impact for the reasons detailed above. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

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

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

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

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

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

10(m)(iii) MUDFLOW: Mudflow is type of landslide. 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. However, the proposed Project would have a less-than-significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

Conclusion

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

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

Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
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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 to be less than significant with mitigation. The Project does not propose the introduction of new infrastructure such as major roadways, water supply systems, or utilities to the area. The Project is a residential subdivision that would divide a 9.91-acre parcel into 7 single-family residential lots, which is consistent with the SR-1 development density established by the General Plan.

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

- 11(b) The GPU EIR concluded this impact to be less than significant. The Project would subdivide a 9.91-acre parcel into 7 single-family residential lots, which is consistent with the development density established by the GPU EIR. The discretionary actions for the Project include a tentative map and an administrative permit. The Project site is zoned Rural Residential (RR) and has a General Plan land use designation of SR-1. As stated in response 11(a), the Project would be consistent with the General Plan allowed density and has been anticipated in the GPU EIR.

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

Conclusion

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

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

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

- 12(a) The GPU EIR determined that impacts to mineral resources would be significant and unavoidable. The California Surface Mining and Reclamation Act (SMARA) required classification of land into Mineral Resource Zones (MRZs). The project site has been classified by the California Department of Conservation – Division of Mines and Geology (Update of Mineral Land Classification: Aggregate Materials in the Western San Diego

Production-Consumption Region, 1997) as an area of “Potential Mineral Resource Significance” (MRZ-3). However, the Project site is surrounded by densely developed land uses, which are incompatible to future extraction of mineral resources on the Project site. A future mining operation at the project site would likely create a significant impact to neighboring properties for issues such as noise, air quality, traffic, and possibly other impacts. Therefore, implementation of the Project would not result in the loss of availability of a known mineral resource that would be of value since the mineral resource has already been lost due to incompatible land uses.

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

12(b) The GPU EIR concluded this impact to be significant and unavoidable. The Project is not located in an area that has MRZ-2 designated lands, nor is it located within 1,300 feet of such lands. Therefore, no potentially significant loss of availability of a known mineral resource of locally important mineral resource recovery (extraction) site delineated on a local general plan, specific plan or other land use plan would occur as a result of this Project. The Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

Conclusion

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

1. No peculiar impacts to the Project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. 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
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13. Noise – Would the Project:

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?

f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

Discussion

A Temporary Construction Noise Report was prepared for the Project by Eilar Associates, Inc., dated October 8, 2021 (Attachment J). The following responses have incorporated the analysis from the report.

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

General Plan – Noise Element: Policy 4b addresses noise sensitive areas and requires projects to comply with a Community Noise Equivalent Level (CNEL) of 60 decibels (dBA). 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. A single-family home development would likely be exposed to and generate occasional nuisance noise (i.e., intermittent or temporary neighborhood noise from sources such as amplified music, barking dogs, and landscape maintenance equipment that may be disturbing to other residents). Section 36.404 of the County Municipal Code contains the noise control standards for the county and prohibits nuisance noise from exceeding the noise standards at any time. Compliance with the County Municipal Code would limit exposure to excessive nuisance noise. Additionally, nuisance noises would be different from each other in kind, duration, and location. Therefore, the overall effects would be separate and, in most cases, would not affect the receptors at the same time. Therefore, the Project is not expected to expose existing or planned noise sensitive areas to noise in excess of 60 dB(A).

Noise Ordinance – Section 36-404: Non-transportation noise generated by the Project is not expected to exceed the standards of the Noise Ordinance at or beyond the Project’s property line. The site is zoned Rural Residential that has a one-hour average sound limit of 50 dBA daytime and 45 dBA nighttime. The adjacent properties are zoned Multi-Family Residential, Residential Single, and Rural Residential. Project operation does not involve any noise producing equipment that would exceed applicable noise levels at the adjoining property line.

Noise Ordinance – Section 36-410: Temporary construction noise is subject to the County’s 75 dBA eight-hour average requirement at the boundary of any occupied property, specifically an existing residence. It is not anticipated that the Project would operate construction equipment in excess of an average sound level of 75 dB between the hours of 7 AM and 7 PM as described in greater detail in the Temporary Construction Noise Report. The Project would not generate construction noise in excess of Noise

Ordinance standards. Construction operations would occur only during permitted hours of operation. In addition, the following “good practice” recommendations shall be adhered to whenever possible:

- Turn off equipment when not in use.
- Equipment used in construction should be maintained in proper operating condition, and all loads should be properly secured, to prevent rattling and banging.
- Use equipment with effective mufflers.
- Minimize the use of backup alarms.
- Equipment staging areas should be placed at locations away from noise-sensitive
 - (occupied) receivers.

As previously discussed, the GPU EIR determined impacts from excessive noise levels to be less than significant with mitigation. The Project would have a less-than-significant impact with the incorporation of design features and conditions. Therefore, the Project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 13(b) The GPU EIR concluded this impact to be less than significant with mitigation. The Project proposes residential uses which are sensitive to low ambient vibration. The Project does not propose any blasting or rock crushing during the grading operations. In addition, Project operation does not involve any vibration producing equipment that would exceed applicable vibration levels at the adjoining property line.

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

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

As previously discussed, the GPU EIR determined impacts from permanent increase in ambient noise levels to be significant and unavoidable. However, the Project would have a less-than-significant impact with no required mitigation for the reasons detailed above. Therefore, the Project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 13(d) The GPU EIR concluded this impact to be less than significant with mitigation. The Project does not involve any operational uses that may create substantial temporary or periodic increases in ambient noise levels in the Project vicinity. Temporary construction noise was assessed and would be subject to the County 75 dBA eight-hour average requirement at the boundary of any occupied property, specifically an existing residence.

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

- 13(e) The GPU EIR concluded this impact to be less than significant with mitigation. The Project is not located within an ALUCP for airports or within 2 miles of a public airport or public use airport. The nearest airport is the Gillespie Field, which is approximately 7.2 miles away from the Project site. Therefore, the Project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.
- 13(f) The GPU EIR concluded this impact to be less than significant with mitigation. The Project is not located within a one-mile vicinity of a private airstrip. Therefore, the proposed Project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

Conclusion

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

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

Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
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14. Population and Housing – Would the Project:

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|---|--------------------------|--------------------------|--------------------------|
| 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 Project site is designated in the General Plan as Semi Rural Residential (SR-1). The Project is consistent with the density allowable under the general plan, and thus would not induce substantial unplanned population growth in the area as development of the site was accounted for within the GPU. In addition, the Project does not propose any physical or regulatory change that would remove a restriction to or encourage population growth in the area.

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

- 14(b) The GPU EIR concluded this impact to be less than significant. The Project would not displace significant numbers of existing housing. The Project would develop 7 single-family residential lots on land which is currently vacant and undeveloped. As such, replacement housing would not be required elsewhere.

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

- 14(c) The GPU EIR concluded this impact to be less than significant. The Project would not displace a substantial number of people. The addition of 7 dwelling units would yield a net gain of available housing. As such, replacement housing would not be required elsewhere.

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

Conclusion

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

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

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

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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protection, police protection, schools, parks, or other public facilities?

Service availability forms were prepared for the Project for fire protection and schools (Attachment K and Attachment L, respectively). The following responses have incorporated these forms.

Discussion

15(a) The GPU EIR concluded this impact to be less than significant with mitigation, with the exception of school services, which remained significant and unavoidable. Based on the service availability forms received for the Project, the proposed Project would not result in the need for significantly altered services or facilities.

Fire and emergency protection would be provided by the San Miquel Fire District. The nearest fire station is San Miguel Fire District Station 16 located at 905 Gilesie Drive in Spring Valley. This station is approximately 1.4 miles from the Project site and has sufficient capacity to serve the Project. Police protection would be provided by the San Diego County Sheriff’s Department. Pursuant to the Project availability forms, students living within this community would attend schools in the La Mesa Spring Valley School District. The elementary school serving this site would be Sweetwater Springs Elementary School, located approximately 3.7 miles from the Project site. The middle school would be STEAM La Presa, located approximately 1.8 miles from the Project site. All applicable school fees to the La Mesa Spring Valley School District would be required to be paid prior to the issuance of a building permit for each individual residence. The Project’s effect on public parks is discussed in response 16(a) and response 16(b).

Based on the discussion above, the Project would not result in the need for significantly altered services or facilities. As previously discussed, the GPU EIR determined impact to fire protection services, police protection services, and other public services as significant with mitigation, while school services remained significant and unavoidable. However, as the Project would have a less-than-significant impact for the reasons stated above, the Project would be consistent with the analysis 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
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16. Recreation – Would the Project:

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

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

Discussion

16(a) The GPU EIR concluded this impact to be less than significant with mitigation. The Project could increase the use of existing parks and other recreational facilities; however, the Project would be required to comply with the County’s Park Land Dedication Ordinance (PLDO). The PLDO is the mechanism that enables the funding or dedication of local parkland in the County. The Project is a major grading plan for future residential development. To avoid any physical deterioration of local recreation facilities, the Project would be required to pay park fees prior to building permit issuance.

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

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

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

Conclusion

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

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

Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
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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"/>
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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"/>
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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"/>
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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"/>
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e) Result in inadequate emergency access?

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

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

SB 743 was signed into law on September 27, 2013, and changed the way that public agencies evaluate transportation impact under CEQA. A key element of this law is the elimination of using auto delay, LOS, and other similar measures of vehicular capacity or

traffic congestion as a basis for determining significant transportation impacts under CEQA. The legislative intent of SB 743 was to “more appropriately balance the needs of congestion management with statewide goals related to infill development, promotion of public health through active transportation, and reduction of greenhouse gas (GHG) emissions.” According to the law, “traffic congestion shall not be considered a significant impact on the environment” within CEQA transportation analysis.

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

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

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

The Project would develop 7 single-family lots and would not generate more than 110 average daily trips. Therefore, the Project is considered to not result in a significant direct or cumulative VMT impact and can be screened out from conducting a detailed VMT analysis. Therefore, the Project would not conflict with an applicable plan, ordinance or policy establishing measures of the effectiveness for the performance of the circulation system and impacts would be less than significant.

As previously discussed, the GPU EIR determined significant and unavoidable impacts to unincorporated County traffic and LOS standards. The proposed Project determined impacts to be potentially significant. The Project would have a less-than-significant impact therefore, the Project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

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

Section 15064.3 of the CEQA Guidelines details new regulations, effective statewide July 1, 2020 that sets forth specific considerations for evaluating a project’s transportation impacts. Generally, VMT is the most appropriate measure of transportation impacts. VMT refers to the amount and distance of automobile travel attributable to a project. Other

relevant considerations may include the effects of the project on transit and non-motorized travel. Except as provided regarding roadway capacity, a project's effect on automobile delay shall not constitute a significant environmental impact. As discussed in 17(a), the Project can be screened out from a VMT analysis and would not result in a significant direct or cumulative VMT impact, and mitigation measures are not required.

As previously discussed, the GPU EIR concluded this impact to be significant and unavoidable. The 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 Project site is not located within an Airport Influence Area, Airport Safety Zone, ALUCP Area, Aviation Easement, or Overflight Area. Therefore, the Project would have a less than significant impact to air traffic patterns. The Project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

17(d) The GPU EIR concluded this impact to be significant and unavoidable. The proposed Project would not substantially alter traffic patterns, roadway design, place incompatible uses (e.g., farm equipment) on existing roadways, or create curves, slopes or walls which would impede adequate sight distance on a road. The private driveways onto Grand Avenue would meet County design standards with improved sight lines.

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

17(e) The GPU EIR concluded this impact to be less than significant with mitigation. The proposed Project would not result in inadequate emergency access. The Project is not served by a dead-end road that exceeds the maximum cumulative length permitted by the San Diego County Consolidated Fire Code. Driveway/ would be constructed to a minimum of 16-feet in width and would meet County Fire Code Standard 503.2.6. In addition, consistent with GPU EIR mitigation measure Tra-4.2, the Project would implement the Building and Fire codes to ensure emergency vehicle accessibility.

As previously discussed, the GPU EIR determined impacts on emergency access as less than significant with mitigation. As the Project would have a less-than-significant impact with the implementation of project conditions of approval for adherence to the building and fire codes, consistent with GPU EIR mitigation measure Tra-4.2. The Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

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

As previously discussed, the GPU EIR determined impacts on alternative transportation and rural safety as less than significant with mitigation. As the proposed Project would

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

Conclusion

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

1. No peculiar impacts to the Project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. Feasible mitigation measures contained within the GPU EIR 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, 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
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18. Utilities and Service Systems – Would the Project:

- | | | | |
|--|--------------------------|--------------------------|--------------------------|
| a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| e) Result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project’s projected demand in addition to the provider’s existing commitments? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| f) Be served by a landfill with sufficient permitted capacity to accommodate the project’s solid waste disposal needs? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

g) Comply with federal, state, and local statutes and regulations related to solid waste?

Service availability forms were prepared for the Project for sewer and water service (Attachment M and Attachment N, respectively). The following responses have incorporated these forms.

Discussion

18(a) The GPU EIR concluded this impact to be less than significant with mitigation. The Project is located within the San Diego County Sanitation District boundaries. The Project does not propose to discharge domestic waste to on-site wastewater systems (OSWS), also known as septic systems. A service availability letter from San Diego County Sanitation District dated July 15, 2019 indicated that it has sufficient capacity to serve the Project. Therefore, the Project would be consistent with the wastewater treatment requirements of the RWQCB.

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

18(b) The GPU EIR concluded this impact to be less than significant with mitigation. As described in response 18(a), the Project would utilize wastewater services from the San Diego County Sanitation District, which has adequate services to serve the Project. In addition, the Project requires water service from the Helix Water District. According to water service availability form dated July 15, 2019, adequate water resources and entitlements are available to serve the Project. Therefore, the Project would not require the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.

As previously discussed, the GPU EIR determined impacts to adequate water supplies be less than significant with mitigation. However, the proposed Project would have a less-than-significant for the reasons detailed above. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

18(c) The GPU EIR concluded this impact to be less than significant with mitigation. The Project involves new storm water drainage facilities; however, these extensions would not result in additional adverse physical effects beyond those already identified in other sections of this environmental analysis.

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

18(d) The GPU EIR concluded this impact to be significant and unavoidable. The Project would receive water from the Helix Water District, which has adequate water to serve the Project according to the water service availability form dated July 15, 2019. As the proposed Project would have a less-than-significant impact, the Project would be consistent with the

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

- 18(e) The GPU EIR concluded this impact to be less than significant with mitigation. The Project would require wastewater services from the San Diego County Sanitation District, which has adequate services available to serve the Project according to the sewer service availability form dated July 15, 2019. Therefore, the Project would not interfere with any wastewater treatment provider’s service capacity.

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

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

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

Conclusion

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

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

Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
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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"/>
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- b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?
- c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts in the environment?
- d) Expose people or structures to significant risk, including downslopes or downstream flooding or landslides, as a result of runoff, post-fire instability, or drainage changes?

Discussion

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

19(a) The GPU EIR concluded this impact to be significant and unavoidable. The site is located within LRA. The Project site is within the authority of the San Miguel Fire Protection District and is located approximately 1.4 miles from the nearest fire station, which is San Miguel Fire District Station 16 located at 905 Gillespie Dr in the unincorporated community of Spring Valley. Based on the fire service availability form received for the Project, the expected emergency travel time to the proposed Project would be 4 minutes. This would meet the response time required for the Project by the County of San Diego General Plan Safety Element of 5 minutes. Access would be provided by private driveways along Grand Avenue.

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

19(b) The GPU EIR concluded this impact to be significant and unavoidable. The Project is within the unzoned fire hazard severity zone and within the Urban-Wildlife Interface Zone. The Project would comply with regulations relating to emergency access, water supply, and defensible space specified in the County Fire Code and Consolidated Fire Code. Implementation of these fire safety standards would occur during the building permit process and is consistent with GPU EIR mitigation measures Haz-4.2 and Haz-4.3. In addition, the Project is consistent with the Zoning Ordinance and the allowable development density established under the GPU. Therefore, for the reasons stated above, the Project would not be expected to experience exacerbated wildfire risks due to slope, prevailing, winds or other factors.

As previously stated, Wildfire was analyzed within the GPU EIR within Section 2.7, Hazards and Hazardous Materials and was determined to be significant and unavoidable. However, the proposed Project would have a less-than-significant impact with the implementation of GPU EIR mitigation measures Haz-4.2 and Haz-4.3 for the implementation of brush management and compliance with the building and fire codes. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

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

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

- 19(d) The GPU EIR concluded this impact to be significant and unavoidable. As previously stated in 19(b), the Project would comply with regulations relating to emergency access, water supply, and defensible space specified in the County Fire Code and Consolidated Fire Code. The site is located within a "Landslide Susceptibility Area" as identified in the County Guidelines for Determining Significance for Geologic Hazards and is considered to be Generally Susceptible. The Project site is sloping at shallow to steep slope ratios and is underlain by volcanic bedrock that is not considered to be generally susceptible to landslides. Therefore, the Geological Reconnaissance determined the potential for landsliding at the Project site is low. In order to assure that any proposed buildings are adequately supported, a Soils Engineering Report is required as part of the grading and building permit process. This Report would evaluate the strength of underlying soils and make recommendations on the design of building foundation systems. The Soils Engineering Report must demonstrate that a proposed building meets the structural stability standards required by the California Building Code. The report must be approved by the County prior to the issuance of a building permit. Therefore, for the reasons stated above, the project site would not expose people or structures to significant risk, including downslopes or downstream flooding or landslides, as a result of runoff, post-fire instability, or drainage changes.

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

Conclusion

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

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

2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. Feasible mitigation measures contained within the GPU EIR (Haz-4.2 and Haz-4.3) would be applied to the Project. These mitigation measures, as detailed above, require the Project applicant to implement brush management and comply with the building and fire codes.

Appendices

Appendix A – References

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

Appendix A

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

Advanced Geological Solutions INC. (August 2022). Geologic Reconnaissance, Proposed 7-Lot Residential Subdivision, TM 5636, Northwest of Grand Avenue & Date Street, Spring Valley Area, County of San Diego (Attachment E).

County of San Diego. (August 2023). Spring Valley Residential Project, PDS2019-TM-19-5636 Greenhouse Gas Analysis (Attachment G).

Eilar Associates, Inc. (February 2021). Temporary Construction Noise Report (Attachment J).

Helix Water District. (July 2019). Water Service Availability Form (Attachment N).

Klutz Biological Consulting. (October 2023),). Biological Resources Letter Report (Attachment C).

La Mesa Spring Valley School District. (July 2019). School Service Availability Form (Attachment L).

Laguna Mountain Environmental, Inc. (February 2021). Cultural Resource Survey of the Spring Valley Housing Project (Attachment D).

San Diego County Sanitation District. (July 2019). Sewer Service Availability Form (Attachment M).

San Miguel Fire District. (July 2019). Fire Service Availability Form (Attachment K).

Scientific Resources Associated. Eilar Associates, Inc. (October 2021). Air Quality Assessment (Attachment B).

Walsh Engineering & Surveying, Inc. (May 2023). Steep Slope Exhibit (Attachment F).

Walsh Engineering & Surveying, Inc., (January 2024). Preliminary Drainage Study (Attachment I).

Walsh Engineering & Surveying, Inc. (October 2023). Stormwater Quality Management Plan for Priority Development Projects (Attachment H).

References

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

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

Appendix B

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

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