County of San Diego

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DAHVIA LYNCH
DIRECTOR

March 30, 2022 ~~July 15, 2021~~

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

Pursuant to CEQA Guidelines §15183

Project Name: Escondido Estates
Project Record Numbers: PDS2020-TM-5639; PDS2020-AD-20-007
Environmental Log Number: PDS2020-ER-20-08-007

APN(s): 234-231-01-00

Lead Agency Name and Address:
County of San Diego
Planning and Development Services
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San Diego, CA 92123-1239

County Staff Contact:
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Project Location:
The proposed Escondido Estates project (Project) is located within the unincorporated community of Escondido in northern San Diego County. The approximately 10.3-acre Project site is located southeast of the intersection of San Pasqual Valley Road (SR-78) and Idaho Ave, near the City of Escondido municipal boundary. The site is located within the North County Metropolitan Subregional Plan area. Single-family residential development within the unincorporated County abuts the Project site to the east and south, with vacant land to the north, and a church and school immediately adjacent to the west.

Project Applicant Name and Address:
Oscar Uranga
19782 MacArthur Blvd., Suite 300
Irvine, CA 92612

General Plan
Community Plan: North County Metropolitan Subregional Plan

Regional Categories:	Village
Land Use Designations:	Village Residential (VR-2)
Density:	VR-2 (2 Du/Ac)
Floor Area Ratio (FAR)	N/A

Zoning

Use Regulation:	Limited Agricultural (A70)
Minimum Lot Size:	0.5 acre
Special Area Regulation:	N/A

Description of Project:
The Project is a request for a Tentative Map consisting of 20 single-family residential lots and 2 HOA lots for open space, drainage, and roadway purposes. The Project includes an Administrative Permit to allow for lots smaller than the minimum lot size (lot area averaging). The Escondido Estates (Project) applicant proposes the subdivision of an approximately 10.3-acre parcel into 20 single-family residential lots within the North County Metropolitan Subregional Plan area. The Project site is vacant, with an existing on-site well within an easement to the neighboring parcel to the north, which would be retained by the Project. The Project site is surrounded primarily by single-family residential development interspersed with vacant land and adjacent to an existing church and private school across San Pasqual Valley Road. The site and surrounding lands are flat to moderately sloped with an average slope between 5% to 15% percent. Access to the site will be provided by a private road connection to Idaho Avenue. The Project would be served by onsite wastewater treatment systems for each lot and imported water from the City of Escondido.

Discretionary Actions:
Discretionary permits for the Project include a Tentative Map and an Administrative Permit. The Tentative Map would subdivide the approximately 10.3-acre Project site to 20 single-family residential lots with 2 HOA lots. The Administrative Permit would allow for lot area averaging to create lots smaller than the minimum lot size prescribed by Zoning for the site.

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

General Plan Update Program EIR

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

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

Summary of Findings

The Escondido Estates 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 http://www.sdcounty.ca.gov/PDS/gpupdate/docs/BOS_Aug2011/EIR/FEIR_7.00_-_Mitigation_Measures_2011.pdf for complete list of GPU Mitigation Measures.

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

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

1. **The Project is consistent with the development density established by existing zoning, community plan or general plan policies for which an EIR was certified.**
   The Project would divide a 10.3-acrea parcel into 20 single-family residential lots, which is consistent with the VR-2 development density established by the General Plan and the certified GPU EIR with the approval of an Administrative Permit for Lot Area Averaging.

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 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 15183 Exemption Checklist below, no potentially significant off-site or cumulative impacts have been identified which were not previously evaluated.

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

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

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

As explained in the 15183 exemption checklist below, the 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
Juliette Orozco	**Project Manager**
Printed Name	Title

CEQA Guidelines §15183 Exemption Checklist

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

- Items checked "Significant Project Impact" indicates that the Project could result in a significant effect which either requires mitigation to be reduced to a less than significant level or which has a significant, unmitigated impact.

- Items checked "Impact not identified by GPU EIR" indicates the Project would result in a Project specific significant impact (peculiar off-site or cumulative that was not identified in the GPU EIR.

- Items checked "Substantial New Information" indicates that there is new information which leads to a determination that a Project impact is more severe than what had been anticipated by the GPU EIR.

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

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

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

Discussion

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

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

As described in the General Plan Update Environmental Impact Report (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 southeast of the intersection of San Pasqual Valley Road (SR-78) and Idaho Avenue, within the North County Metropolitan Subregional Plan Area in the unincorporated County of San Diego. No RCAs established for protecting visual resources as identified by the County of San Diego General Plan or North County Metropolitan Subregional Plan exist within the vicinity of the Project site.

Additionally, no trail systems or public parks would provide topographically accessible views to the Project. The Project site is located 2.9 miles from the proposed San Dieguito River Park Trail, which would not afford any views of the Project site due to distance and intervening topography and land uses. Additionally, the San Dieguito River Park Trail has

not yet been established, and therefore the Project would not detract from existing views from an adopted County or State trail system.

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 Project site is not within the vicinity of a State Designated Scenic Highway, however the County General Plan identifies roadways that are designated as scenic corridors within the Conservation and Open Space Element and have been included as part of the County Scenic Highway System. Designated scenic roadways located in the vicinity of the project site include Bear Valley Parkway, located 0.3 miles to the east of the project site, and San Pasqual Valley Road, located 0.5 miles to the southeast of the project site. Direct views to the project site are minimal and brief, and would not substantially obstruct, interrupt, or detract from an existing scenic vista. Additionally, the Project would be consistent with surrounding single-family residential land uses.

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 Escondido, located southeast of the intersection of San Pasqual Valley Road (SR-78) and Idaho Avenue, and within one-quarter mile of the municipal boundary of the City of Escondido. The existing visual character and quality of the Project surroundings are characterized as semi-rural and village single-family residential and civic land use types with relatively flat to moderately 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 North County Metropolitan Subregional 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 will use outdoor lighting and is located within Zone B as identified by the San Diego County Light Pollution Code, approximately 40 miles from the Mount Laguna Observatory and approximately 17 miles from Palomar Observatory. However, the Project will not adversely affect nighttime views or astronomical observations, because the Project will 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
2. Agriculture/Forestry Resources – Would the Project:			
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide or Local Importance as shown on the maps prepared pursuant to the Farmland Mapping and	☐	☐	☐

Monitoring Program of the California Resources Agency, or other agricultural resources, to a non-agricultural use?			
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐
c) Conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland zoned Timberland Production?	☐	☐	☐
d) Result in the loss of forest land, conversion of forest land to non-forest use, or involve other changes in the existing environment, which, due to their location or nature, could result in conversion of forest land to non-forest use?	☐	☐	☐
e) Involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Important Farmland or other agricultural resources, to non-agricultural use?	☐	☐	☐

Discussion

2(a) The GPU EIR concluded this impact to be significant and unavoidable. A Local Agricultural Resource Assessment (LARA) Model was prepared for the Project by County Agricultural Resources Specialist dated June 21, 2021 which analyzed agricultural resources on the project site. Based on the County of San Diego Geographical Information System and aerial imagery, the site has been mapped “other land” by the Department of Conservation, Farmland Mapping and Monitoring Program (FMMP) and is not considered an important agricultural resource. However, FMMP mapped “Prime Soils” and County Farmland of Statewide Importance Soil Candidates are underlain on a portion of the project site. The following soils were identified on-site:

- Ramona Sandy Loam, 2 to 5% slopes (RaC) – 8.98 acres
- Fallbrook-Vista Sandy Loam, 15 to 30% slopes (FvE) – 1.30 acres

Prime soils mapped by the FMMP cover approximately 6.86 acres of the site, while RaC, a County-candidate soil, covered approximately 8.98 acres of the project site. The remainder of the site is FvE, which is not considered a prime soil mapped by the FMMP nor are considered a County-candidate soil.

Based on the results of the Local Agricultural Resources Assessment (LARA) Model, the site is not considered an important agricultural resource. The site received a low rating for water and land use consistency, and a moderate rating for soil quality and surrounding land use. The site received a high rating for climate and slope. To be considered an important agricultural resource under the LARA model, a water rating of high must be present. Therefore, the site’s low water rating means that the site is not an important agricultural resource.

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

reasons detailed above. 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 GPU The project site is zoned A70, limited agricultural, however, as mentioned above in response 2(a), the project site would not be considered a viable agricultural resource due to the lack of water resources on site. The nearest lands under Williamson Act Contract or in an agricultural preserve are located approximately 0.7-miles east of the project site. Due to distance, no land-use interface conflicts would occur. Additionally, the Project is for the development of a residential subdivision, which is compatible with the surrounding residential 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 Public Resources Code section 12220(g), therefore Project implementation would not result in the loss or conversion of forest land to a non-forest use. The outer edge of the Cleveland National Forest is located approximately 9.5 miles to the east of the project site. Thus, due to distance, the Project would have no impact on the Forest. In addition, the County of San Diego does not have any existing Timberland Production Zones.

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 responses 2(a) and 2(b), the site is undeveloped with no active agricultural use types. The Project site is zoned A70, limited agricultural, however, as mentioned above in response 2(a), the Project site would not be considered a viable agricultural resource due to the lack of water resources on site.

Active agricultural operations (row crops) exist approximately 1.5 miles east of the project site. However, due to distance, no indirect impacts would occur.

As previously discussed, the GPU EIR determined impacts from direct and indirect conversion of agricultural resources (including forest resources) to be significant and unavoidable. However, the 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

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

Discussion
An Air Quality Assessment was prepared for the Project by Ldn Consulting, Inc. dated May 26, 2021

3(a) The GPU EIR concluded this impact to be less than significant. An Air Quality Assessment was prepared by Jeremy Louden, Ldn Consulting, Inc. dated May 26, 2021 (included in Appendix A). The General Plan designates the Project site as Village (VR-2) Residential. The Project proposes to build 20 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, which is used in San

Diego Association of Governments' (SANDAG's) growth projections, it is consistent with San Diego County Air Pollution Control District's (SDAPCD's) Regional Air Quality Strategy (RAQS) and portions of the State Implementation Plan (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 Question 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. In general, air quality impacts from land use projects are the result of emissions from area sources (landscaping and consumer products), energy (natural gas), transportation (on-road mobile sources), and short-term construction activities. The County of San Diego (County) has identified significance SLTs which incorporate SDAPCD's established air quality impact analysis trigger levels for all new source review (NSR) in SDAPCD Rule 20.2 and Rule 20.3. These SLTs identified in the County Guidelines can be used as numeric methods to demonstrate that a project's total emissions (e.g., stationary and fugitive emissions, as well as emissions from mobile sources) would not result in a significant impact to air quality. SLTs for volatile organic compounds (VOCs) are based on the threshold of significance for VOCs from the South Coast Air Quality Management District (SCAQMD) for the Coachella Valley (which is more appropriate for the San Diego Air Basin). The County's SLTs and SDAPCD's trigger levels were developed in support of State and federal ambient air quality standards that are protective of human health.

The Project proposes to build 20 single-family residential dwelling units. Construction of the Project is expected to begin early 2022 and be completed in 2023. The first year of full operations would be expected in 2024. Emissions generated during construction activities would be temporary and localized. Earthwork activities during construction of the Project would require 16,200 cubic yards of soil import. 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 require all construction equipment used during grading and site preparation activities to employ EPA certified Tier 4 engines with diesel particulate filters (DPF) as mitigation. This mitigation measure was identified by the GPU EIR Mitigation Measure 2.5 which requires additional control measures for projects that exceed SLTs. With the application of fugitive dust control measures, emissions of criteria air pollutants during construction activities would be below the County SLTs (see Appendix A). According to the County of San Diego's Operational Phase Air Quality Study Trigger Criteria, the proposed Project would not result in development that would exceed the trigger level for a single-family residential land use[1] for operational emissions and would not result in emissions that exceed the County's SLTs,

Project construction emissions associated with the proposed residential development are not anticipated to exceed the County's construction and operational SLTs, based on the

[1] County of San Diego. 2007. County of San Diego, Guidelines for Determining Significance and Report Format and Content Requirements, Air Quality. Available: https://www.sandiegocounty.gov/content/dam/sdc/pds/ProjectPlanning/docs/AQ-Report-Format.pdf. Accessed June 22, 2021.

analysis presented in the Air Quality Assessment (Appendix A). 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 measure Air-2.6.

Project Mitigation

Tier 4 Construction Equipment and Diesel Particulate Filters
All diesel-powered equipment will be equipped with engines that meet or exceed either EPA or California Air Resources Board (CARB) Tier 4 off-road with DPF emissions standards for particulate matter exhaust. An exemption from the Tier 4 with DPF requirement may be granted by the County in the event that the Developer documents that equipment with the required tier is not reasonably available and corresponding reductions in criteria air pollutant emissions are achieved from another construction equipment. Before an exemption may be considered by the County, the Developer shall be required to demonstrate that three construction fleet owners/operators in the San Diego region were contacted and that those owners/operators confirmed Tier 4 Final equipment with DPF could not be located within the San Diego region.

3(c) The GPU EIR concluded this impact to be significant and unavoidable. San Diego County is presently in non-attainment for the National and California Ambient Air Quality Standard (NAAQS and CAAQS, respectively) for ozone (O_3). San Diego County is also presently in non-attainment for concentrations of Particulate Matter less than or equal to 10 microns (PM_{10}) and Particulate Matter less than or equal to 2.5 microns ($PM_{2.5}$) under the CAAQS. O_3 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 PM_{10} and $PM_{2.5}$ in both urban and rural areas include: motor vehicles, wood burning stoves and fireplaces, dust from construction, landfills, agriculture, wildfires, brush/waste burning, and industrial sources of windblown dust from open lands.

The Project would contribute PM_{10}, $PM_{2.5}$, NO_X, and VOC emissions from construction/grading activities; however, it would not exceed established SLTs (see Question 3(b) above). Additionally, grading and all other construction activities would be subject to the County of San Diego Grading Ordinance and SDAPCD Rule 55, which require the implementation of dust control measures. Additionally, Tier 4 construction equipment with DPF or equivalent will be used in for the construction activity. The Project would generate PM_{10}, $PM_{2.5}$, and NO_X emissions during Project operations primarily from mobile sources (i.e., vehicle trips), and VOCs from area and mobile sources. However, the proposed Project does not exceed the County's Operational Phase Air Quality Study Trigger Criteria for operational emissions and therefore would not result in emissions that exceed the County's SLTs.[2]

[2] County of San Diego. 2007. County of San Diego, Guidelines for Determining Significance and Report Format and Content Requirements, Air Quality. Available: https://www.sandiegocounty.gov/content/dam/sdc/pds/ProjectPlanning/docs/AQ-Report-Format.pdf. Accessed June 22, 2021.

Cumulative impacts could occur if the most intensive phases of construction for the proposed Project occur simultaneously with other intensive phases of proposed projects in close proximity. The most intensive construction phase for the Project and for typical developments occurs during earthwork and grading activities. During these phases, the primary criteria air pollutant of concern would be PM_{10}. As discussed in the Air Quality Assessment (Appendix A), zero 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 PM_{10}, was estimated to be 18 lb/day (Appendix A) which would be relatively low compared to the County's SLTs of 100 lb/day during construction activities. Further, due to the highly dispersive nature of particulate matter, a cumulative impact during construction activities would only occur if a project adjacent to the proposed Project undergoes simultaneous grading/earthwork activities and emits significantly greater PM_{10} emissions than the Project. Because all projects developed within the County would be required to comply with the County Grading Ordinance and SDAPCD Rule 55, this scenario is not anticipated to occur.

The Project 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 Question 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 emissions. The nearest sensitive receptors to the Project site are existing residential dwelling units and schools located adjacent to the Project site boundaries. 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. From the health risk assessment in the air quality study, it was found that significant cancer health risks could be tied to construction and therefore would require mitigation to comply. Using Tier 4 construction equipment with DPF would reduce cancer risks to less than significant at all receptors surrounding the Project site. Abidance to the County of San Diego Grading Ordinance, SDAPCD Rule 55, the application of Tier 4 engines with DPF as mitigation, and to a confined construction schedule would reduce emissions and exposure to construction emissions would be temporary and would not expose sensitive receptors to excessive concentrations of air pollutants. 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.

As discussed in Question 3(b), according to the County of San Diego's Operational Phase Air Quality Study Trigger Criteria, the proposed Project would not result in development that would exceed the trigger criteria for a single-family residential land use for operational emissions and would not result in emissions that exceed the County's SLTs or health risk,

Furthermore, as indicated in Question 3(b), NAAQS and CAAQS would not be exceeded due to project contributions for both operations and construction and would not expose sensitive receptors to an incremental health risk. In addition, the implementation of Tier 4 construction equipment with DPF as mitigation would reduce onsite PM_{10} from construction exhaust emissions (i.e., DPM), reducing inhalation cancer risk to a less than significant level.

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-2.6) would be applied to the Project.

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

Discussion

A Biological Resources Letter Report was prepared for the Project by LSA dated February 2021.

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 LSA, dated February 2021. The site contains non-native grassland, walnut woodland, and eucalyptus woodland habitat. No sensitive wildlife or plant species were identified on site. As a result of this Project, impacts will occur to 9.1 acres of non-native grassland, 0.035 acres of walnut woodland, and 0.3 acres of eucalyptus woodland. The site is located within the County's draft North County MSCP in land designated as land Outside the Pre-approved Mitigation Area (PAMA).

As considered by the GPU EIR, project impacts to sensitive habitat and/or species will be mitigated through ordinance compliance and through implementation of the following mitigation measures: preservation of 4.6 acres of non-native grassland habitat within a County approved mitigation bank, the preservation of 0.4 acres of walnut woodland within an onsite open space easement, the dedication of an onsite open space easement over 0.8 acres of non-native grassland and 0.2 acres of eucalyptus woodland habitat in order to achieve avoidance, implementation of preconstruction bat surveys to avoid impacts to foliage-roosting bats, and breeding season avoidance to prevent brushing, clearing, and/or grading between February 1 and August 31. The GPU EIR identified these mitigation measures as Bio-1.6 and Bio-1.7.

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 the GPU EIR mitigation measures Bio-1.6 and Bio-1.7 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(b) The GPU EIR concluded this impact to be significant and unavoidable. Based on the Biological Resource Letter Report, the project site contains four ephemeral drainage features subject to the Regional Water Quality Control Board (RWQCB) and California Department of Fish and Wildlife (CDFW) jurisdiction. The following sensitive habitats were identified on the site: non-native grassland and walnut woodland. As detailed in response a) above, direct and indirect impacts to sensitive natural communities identified in the RPO, NCCP, Fish and Wildlife Code, and Endangered Species Act are mitigated through implementation of mitigation.

As considered by the GPU EIR, project impacts to sensitive habitats will be mitigated through ordinance compliance and through implementation of the following mitigation measures: preservation of 4.6 acres of non-native grassland habitat within a County approved mitigation bank, the preservation of 0.4 acres of walnut woodland within an onsite open space easement, the dedication of an onsite open space easement over 0.8 acres of non-native grassland and 0.2 acres of eucalyptus woodland habitat in order to achieve avoidance, implementation of preconstruction bat surveys to avoid impacts to foliage-roosting bats, and breeding season avoidance to prevent brushing, clearing, and/or grading between February 1 and August 31. The GPU EIR identified these mitigation measures as Bio-1.6 and Bio-1.7.

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 the GPU EIR mitigation measures Bio-1.6 and Bio-1.7 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 contains four ephemeral drainage features subject to the Regional Water Quality Control Board (RWQCB) and California Department of Fish and Wildlife (CDFW) jurisdiction. Impacts will occur to 0.024 acres of jurisdictional waters. Mitigation, including obtaining appropriate permits and acquisition of offsite mitigation bank credits,

will be implemented. The GPU EIR identified these mitigation measures as Bio-1.5, Bio-1.6, and Bio-2.3

As previously discussed, the GPU EIR determined impacts to federally protected wetlands as less than significant with mitigation. The Project determined impacts to federally protected wetlands to be less than significant with the incorporation of Project conditions for the dedication of an on-site biological open space easement consistent with GPU EIR mitigation measures Bio-1.5, Bio-1.6 and Bio-2.3. 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. Based on a GIS analysis, the County's Comprehensive Matrix of Sensitive Species, and a Biological Resource Letter Report, it was determined that the site is not part of a regional linkage/corridor as identified on MSCP maps nor is it in an area considered regionally important for wildlife dispersal. The site would not assist in local wildlife movement as it lacks connecting vegetation and visual continuity with other potential habitat areas in the general project vicinity.

As previously 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 draft North County Multiple Species Conservation Program (MSCP) and outside of the South County MSCP. Therefore, it does not require conformance with the Biological Mitigation Ordinance (BMO). The Project is consistent with the County's Guidelines for Determining Significance for Biology, the Resource Protection Ordinance (RPO), and the Migratory Bird Treaty Act (MBTA) with the implementation of mitigation. The Project will not conflict with the provisions of any adopted Habitat Conservation Plan, Natural Communities Conservation Plan, other approved local, regional, or state habitat conservation plan or any other local policies or ordinances that protect biological resources. As 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 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. Feasible mitigation measures contained within the GPU EIR (Bio-1.5, Bio-1.6, Bio-1.7, and Bio-2.3) would be applied to the Project.

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

Discussion

The following technical studies were prepared for the Project:

1. Negative Cultural Resources Survey Report, prepared by Natalie Brodie, dated March 17, 2021

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, Natalie Brodie, it has been determined that there are no impacts to historical resources because they do not occur within the project site. The results of the survey are provided in the cultural resources report titled, *Negative Cultural Resources Survey Report*, prepared by Natalie Brodie, dated March 17, 2021.

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. Based on an analysis of records and a survey of the property by County approved archaeologist, Natalie Brodie, it has been determined that there are no impacts to archaeological resources because they do not occur within the project site. A Native American Monitor from the Santa Ysabel Reservation was present during the pedestrian survey. The Native American monitor had no concerns about the Project, and a letter summarizing the observations and comments from Misschief Cultural Monitoring, Inc. is included as an attachment to the cultural study.

Tribal outreach was conducted by the County for the purpose of Native American consultation. Tribal outreach to seventeen tribes (Barona, Campo, Ewiiaapaayp, Inaja, Jamul, Kwaaymii, La Posta, Manzanita, Mesa Grande, Pala, Pechanga, Rincon, San Pasqual, Santa Ysabel, Soboba, Sycuan, and Viejas) was initiated on August 11, 2020.

Six tribes (Jamul, Pala, Pechanga, San Pasqual, Sycuan, and Viejas) responded. Jamul deferred to San Pasqual and consultation was concluded. Formal consultation was conducted with the balance of tribes. The tribes requested that the Project be conditioned with a treatment agreement and preservation plan, and archaeological and tribal monitoring during consultation due to the sensitivity of the area. No Tribal Cultural Resources (TCRs) were identified during consultation.

As considered by the GPU EIR, potential impacts to cultural resources will be mitigated through ordinance compliance and through implementation of the following mitigation measures: 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. The GPU EIR identified these mitigation measures as Cul-2.5. The Project will 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 will be determined by the Project Archaeologist in consultation with the Luiseno Native American monitor. Both the Project Archaeologist and Luiseno Native American monitor will 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 § 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 will 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 Public Resources Code Section 5097.98 has been conducted.
- Public Resources Code §5097.98, CEQA §15064.5 and Health & Safety Code §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 do not contain unique paleontological resources. As such, mitigation (Cul-3.1) identified in the GPU EIR would not be required.

As previously discussed, the GPU EIR determined impacts on paleontological resources would be less than signifc 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(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 see section 5(b) above for mitigation measures for inadvertent discoveries.

As previously discussed, the GU 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), would be applied to the Project.

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
6. Energy Use – Would the Project:			
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of	☐	☐	☐

energy resources, during project construction or operation?			
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☐

Discussion

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

6(a) The Project would increase the demand for electricity and natural gas at the Project site, and gasoline consumption in the Project area during construction and operation relative to existing conditions. CEQA requires mitigation measures to reduce "wasteful, inefficient and unnecessary" energy usages (Public Resources Code Section 21100, subdivision [b][3]). Neither the law nor the State CEQA Guidelines establish criteria that define wasteful, inefficient, or unnecessary use. Compliance with the California Code of Regulations 2019 Title 24 Part 6 Building Code and 2019 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.

Grading and Construction

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

The energy needs for the Project construction would be temporary and is not anticipated to require additional capacity or increase peak or base period demands for electricity or other forms of energy. Construction equipment use and associated energy consumptions would be typical of that associated with the construction of residential projects of this size in a semi-rural setting. Additionally, The Project is consistent with the General Plan and

Zoning Ordinance. Thus, the Project's energy consumption during the grading and construction phase would not be considered wasteful, inefficient, or unnecessary.

Operational

Operation of the Project would be typical of 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 350 would result in the deployment of electric vehicles which would be powered by an increasingly renewable electrical grid.

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% reduction in outdoor use which would reduce energy required for water conveyance;
- Install low flow indoor water fixtures in all residential units, reducing water consumption in associated energy required for water conveyance.
- Install at least one qualified energy efficient appliance in all residential units.
- Install tankless gas or electric water heaters in all residential units.
- Install photovoltaic (PV) solar panels on each residential unit.
- Install one rain barrel for each residential unit.

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

Discussion
7(a)(i) The GPU EIR concluded this impact to be less than significant. The 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

Alquist-Priolo fault to the Project site is located approximately 23 miles to the east of the site.

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. 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 PDS. 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 relatively flat to moderately sloped and risks associated with ground movement hazards are 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 will 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 will ensure that the Project will not result in any unprotected erodible

soils, will not significantly alter existing drainage patterns, and will not develop steep slopes. Additionally, the Project would be required to implement Best Management Practices (BMPs) per the Priority Development Project Storm Water Quality Management Plan to prevent fugitive sediment.

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

7(c) The GPU EIR concluded this impact to be less than significant. As indicated in response (a)(iv), the site is located within a "Landslide Susceptibility Area" as identified in the County Guidelines for Determining Significance for Geologic Hazards 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 conventional leach lines or supplemental treatment systems which would require approval by the County Department of Environmental Health (DEH) prior to issuance of building permits for residential structures. As such, the Project would not place septic tanks or alternative wastewater disposal systems on soils incapable of adequately supporting the tanks or system.

As previously discussed, the GPU EIR determined impacts to wastewater disposal systems to be less than significant. As the proposed Project would have a less-than-significant impact for the reasons detailed above, the Project would be consistent with the

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

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

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

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

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

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

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

Analysis

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.

Greenhouse Gas (GHG) Emissions result in an increase in the earth’s average surface temperature commonly referred to as global warming. This rise in global temperature is associated with long-term changes in precipitation, temperature, wind patterns, and other elements of the earth's climate system, known as climate change. These changes are now broadly attributed to GHG emissions, particularly those emissions that result from the human production and use of fossil fuels.

GHGs include carbon dioxide, methane, halocarbons (HFCs), and nitrous oxide, among others. Human induced GHG emissions are a result of energy production and consumption, and personal vehicle use, among other sources.

Climate changes resulting from GHG emissions could produce an array of adverse environmental impacts including water supply shortages, severe drought, increased

flooding, sea level rise, air pollution from increased formation of ground level ozone and particulate matter, ecosystem changes, increased wildfire risk, agricultural impacts, ocean and terrestrial species impacts, among other adverse effects.

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 metric tons of carbon dioxide equivalent ($MTCO_2e$) 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 $MTCO_2e$.

The proposed Project has incorporated the following design features to reduce the impacts associated with GHGs and will be conditioned to meet the most restrictive requirement standards in effect at the time of construction.

Project Design Features:

- Install photovoltaic (PV) solar panels on each residential unit;
- Plant two new trees per dwelling unit on-site;
- Reduce outdoor water consumption by 40 percent from the Maximum Applied Water Allowance;
- Install low-flow water fixtures;
- Install energy efficient appliances;
- Install tankless gas or electric water heaters in each residential unit;
- Install one rain barrel for each residential unit; and
- Divert 90 percent of inert and 70 percent of all other construction and demolition waste from a landfill;

Project design features 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.

In addition, a screening threshold was used to illustrate that impacts from the Project would be less than significant for GHG emissions. In response to Assembly Bill (AB) 32, the California Air Pollution Control Officers Association (CAPCOA) white paper titled “CEQA & Climate Change: Evaluating and Addressing Greenhouse Gas Emissions from Projects Subject to the California Environmental Quality Act,” provides a methodology used for jurisdictions across the state to identify a screening level for GHG emissions (CAPCOA 2008). The CAPCOA guidance states that projects should be screened to determine if their associated GHG emissions exceed 900 MTCO2e. The threshold was developed based on various land use densities and future discretionary project types to determine the size of projects that would likely have a less than cumulatively considerable contribution to climate change. The CAPCOA threshold was developed to ensure capture of 90 percent or more of likely future discretionary developments. The objective was to set the emissions threshold low enough to capture a substantial fraction of future development while setting the emission threshold high enough to exclude small development projects that would contribute a relatively small fraction of cumulative statewide GHG emissions.

Since adoption of this threshold, Senate Bill (SB) 32 was passed to set a revised statewide reduction target to reduce emissions to 40 percent below 1990 levels by year 2030.

As compared to similar mass emissions thresholds adopted by other regional air districts the CAPCOA 900 $MTCO_2e$ threshold is relatively conservative and could be used to support cumulative impact determination beyond 2020. In April 2020, the Sacramento Metropolitan Air Quality Management District (SMAQMD) published updated project screening levels and determined that projects estimated to generate less than 1,100 $MTCO_2e$ per year would not result in a significant, cumulative impact.[3] This threshold was developed to demonstrate compliance with the statewide reduction targets in 2030 and the threshold was determined by SMAQMD to capture 98 percent of total GHG emissions.

Thus, the CAPCOA threshold of 900 $MTCO_2e$ represents a more stringent screening level than has been approved by other air districts in compliance with 2030 statewide reduction targets. Also, as State legislative requirements such as Building Energy Efficiency Standards and transportation-related efficiency measures become increasingly more stringent over time, future project GHG emissions would be reduced helping to meet State emission reduction targets. As described previously, the Project would generate a total of 276 $MTCO_2e$ per year, which is well below both screening thresholds. However, the Project does not rely on the screening level thresholds to determine impact significance, rather to illustrate that the Project would not cause a significant direct or cumulative impact from GHG emissions due to the relatively small amount of GHG emissions during operation and construction.

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.

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. As such, the Project would be consistent with County goals and policies included in the County General Plan that address GHG reductions. In addition, the Project includes design features that would further reduce GHG emissions.

The Project is consistent with the County's General Plan land use designation of Village Residential (VR-2). Through its goals, policies, and land use designations, the County's General Plan aims to reduce countywide GHG emissions. ~~Furthermore, the County's General Plan growth projections informed the development of the San Diego Association of Governments' (SANDAG's) San Diego Forward: the 2015 Regional Plan which is the region's 2050 Regional Transportation Plan and Sustainable Community Strategy (RTP/SCS). SANDAG's Regional Plan is the region's applicable plan for reducing GHG emissions and is consistent with State GHG emissions reductions goals set by the California Air Resources Board (CARB) under SB 375. Because the proposed Project is consistent with the General Plan land uses, it is also consistent with State GHG emission reduction targets as identified in the SANDAG RTP/SCS.~~ The Project implements sustainable design features and would result in a less than significant impact from vehicle miles travelled. Therefore, the Project would not conflict with the recently adopted San Diego Association of Governments' (SANDAG) San Diego Forward: the 2021 Regional

[3] Sacramento Metropolitan Air Quality Management District (SMAQMD). 2020. Greenhouse Gas Thresholds for Sacramento County. Available: http://www.airquality.org/LandUseTransportation/Documents/SMAQMDGHGThresholds2020-03-04v2.pdf. Accessed. March 18, 2021.

Plan, which includes a Sustainable Communities Strategy (SCS) as required by Senate Bill 375. SANDAG is responsible, in part, for reducing GHG and VMT from cars and light-duty trucks. Because the Project would result in a less than significant VMT impact, it would help support the 2021 Regional Plan's goal to reduce VMT in the region.

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
9. Hazards and Hazardous Materials – Would the Project:			
a) Create a significant hazard to the public or the environment through the routine transport, storage, use, or disposal of hazardous materials or wastes or through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☐
b) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☐
c) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, or is otherwise known to have been subject to a release of hazardous substances	☐	☐	☐

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

Discussion

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

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 within one-quarter mile of an existing school, however the Project does not proposed any hazardous emissions or handling of hazardous or acutely hazardous materials or substances. substances. 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 site visit and 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. Additionally, the Project does not propose construction of any structure equal to or greater than 150 feet in height, constituting a safety hazard to aircraft and/or operations from an airport or heliport. Therefore, the Project will 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 proposed Project is adjacent to wildlands that have the potential to support wildland fires. However, the Project will not expose people or structures to a significant risk of loss, injury or death involving wildland fires because the Project will 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 will occur during the Major Grading Permit and/or building permit process. 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 will 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 will 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 will 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
10. Hydrology and Water Quality – Would the Project:			
a) Violate any waste discharge requirements?	☐	☐	☐
b) Is the project tributary to an already impaired water body, as listed on the Clean Water Act Section 303(d) list? If so, could the project result in an increase in any pollutant for which the water body is already impaired?	☐	☐	☐
c) Could the proposed project cause or contribute to an exceedance of applicable surface or groundwater receiving water quality objectives or degradation of beneficial uses?	☐	☐	☐
d) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	☐	☐	☐
e) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	☐	☐	☐
f) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	☐	☐	☐
g) Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems?	☐	☐	☐

h) Provide substantial additional sources of polluted runoff?	☐	☐	☐
i) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map, including County Floodplain Maps?	☐	☐	☐
j) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	☐	☐	☐
k) Expose people or structures to a significant risk of loss, injury or death involving flooding?	☐	☐	☐
l) Expose people or structures to a significant risk of loss, injury or death involving flooding as a result of the failure of a levee or dam?	☐	☐	☐
m) Inundation by seiche, tsunami, or mudflow?	☐	☐	☐

Discussion

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

1. A Preliminary Hydrology Study for Escondido Estates prepared by X Engineering & Consulting dated June 2021.

2. A Priority Development Project Stormwater Quality Management Plan (PDP SWQMP) prepared by X Engineering & Consulting dated May 4, 2021.

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

During the construction phase, the Project would prepare and implement a Storm Water Pollution Prevention Plan (SWPPP). The SWPPP would implement the following typical erosion control BMPs: hydraulic stabilization and hydroseeding on disturbed slopes; County Standard lot perimeter protection detail and County Standard desilting basin for erosion control on disturbed flat areas; energy dissipater outlet protection for water velocity control; silt fencing, fiber rolls, gravel and sand bags, storm drain inlet protection and engineered desilting basin for sediment control; stabilized construction entrance, street sweeping and vacuuming for offsite tracking of sediment; and measures to control materials management and waste management.

The SWPPP would be prepared in accordance with Order No. 2009-009-DWQ, National Pollutant Discharge Elimination System (NPDES) Order CAS000002 Construction General Permit (CGP) adopted by the State Water Resources Control Board (SWRCB) on September 2, 2009. During the post-construction phase, as outlined in the PDP SWQMP, the Project would implement site design, source control and structural BMPs to prevent potential pollutants from entering 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 CGP 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 Bear (905.24) hydrologic unit within the San Dieguito hydrologic unit. According to the Clean Water Act section 303(d) list, a portion of this watershed is impaired. Constituents of concern in the Lake Hodges and the San Dieguito watersheds include benthic community effects, color, manganese, mercury, nitrogen, phosphorus, total dissolved solids, and turbidity. The Project could contribute to release of these pollutants; however the project would comply with the WPO and implement site design measures, source control BMPs, and structural BMPs to prevent a significant increase of pollutants to receiving waters.

As previously discussed, the GPU EIR determined significant and unavoidable impacts to water quality standards and requirements. However, 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 will 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). 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(d) The GPU EIR concluded this impact to be significant and unavoidable. The Project is within the service area of the City of Escondido that obtains water from surface reservoirs and other imported sources. The Project will not use groundwater for its potable water supply and adequate groundwater resources exist to support the use of an existing well for common-area irrigation. 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; County Standard lot perimeter protection detail and County Standard desilting basin for erosion control on disturbed flat areas; energy dissipater outlet protection for water velocity control; silt fencing, fiber rolls, gravel and sand bags, storm drain inlet protection and engineered desilting basin for sediment control; stabilized construction entrance, street sweeping and vacuuming for offsite tracking of sediment; and measures to control materials management and waste management.

Existing site exits the site via a 8'W x 2'H box culvert at the eastern project boundary, crossing San Pasqual Valley Road to an unnamed natural drainage course that discharges into Lake Hodges, approximately 4 miles south of the project, where it joins the San Dieguito River, ultimately discharging into the Pacific Ocean north of Del Mar and south of Solana Beach.

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 Priority Development Project (PDP) Storm Water Quality Management Plan (SWQMP) dated June 1, 2020, the Project would implement site design, source control and structural 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 Hydrology Study prepared by X Engineering & Consulting dated June 1, 2020 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 Project by X Engineering & Consulting dated May 4, 2021 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 mitigation (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, source control BMPs, and treatment control BMPs as indicated in response 10(a) would be employed such that potential pollutants would be reduced to the maximum extent practicable.

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 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(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 to question 7(a)(iv).

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

Conclusion

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

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

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

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

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

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

Discussion

11(a) The GPU EIR concluded this impact to be less than significant with mitigation. The Project does not propose the introduction of new infrastructure such as major roadways, water supply systems, or utilities to the area. The Project is a residential subdivision proposing the development of 20 single-family residential lots and 2 HOA lots, consistent with the development density per the County of San Diego 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 10.28-acre property into 20 single-family residential lots and 2 HOA lots, which is consistent with the development density established by the General Plan and the certified GPU EIR. The discretionary actions for the Project include a tentative map and an administrative permit for lot area averaging.

The Project site is zone Limited Agriculture (A70) and has a General Plan land use designation of VR-2. 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.

Additionally, the Project requires an administrative permit for lot area averaging to allow for lot sizes smaller than the 0.5-acre minimum lot size prescribed by Zoning for the site. Lot area averaging as a design feature of the Project aims to strike a balance between the preservation of sensitive environmental resources on-site and achieving maximum

residential density as prescribed by the General Plan. In this respect, the project has been designed as a conservation subdivision using the following criteria:

- The development footprint shall be located in the areas of the land being subdivided so as to minimize impacts to environmental resources.
- Development shall be consolidated to the maximum extent permitted by County regulations and the applicable Community Plans.
- The development footprint shall be located and designed to maximize defensibility from wildland fires and to accommodate all necessary fuel modification on site.
- Notwithstanding the requirements of the Slope Encroachment Regulations contained within Section 86.604(e) of the Resource Protection Ordinance, effective October 10, 1991, exceptions to the maximum permitted encroachment into steep slopes shall be allowed in order to avoid impacts to environmental resources that cannot be avoided by other means. The exceptions shall be limited to the minimum necessary to achieve the goals of the conservation subdivision program.
- Roads shall be designed the minimize impacts to environmental resources. Such design standards may include siting roads to reduce impacts from grading, consolidating development to reduce length of roads and associated grading, using alternative permeable paving materials and methods, reduce paved road widths, and smaller curve radii, consistent with applicant public safety considerations.
- Areas avoided from development shall be protected with open space or conservation easements consistent with the following design standards: 1) The largest blocks of unfragmented and interconnected open space shall be conserved; 2) Surface open space area to perimeter ratios shall be maximized by avoiding the creation of slivers or fingers of open space that extend in and around development; 3) Open space shall be located in areas with the maximum amount of connectivity with off-site open space; 4) Multiple habitat types, varying topography, agriculture, etc. shall be conserved to the maximum extent practicable; 5) Unique and/or sensitive resources shall be protected in the core of open space areas to the maximum extent practicable or suitable buffers shall be provided to protect these resources; and 6) Resources shall be avoided and placed in open space pursuant to the percentage indicated in Table 81.401.1. The avoided lands shall be protected with an easement dedicated to the County of San Diego or a conservancy approved by the Director. Land used for mitigation for project impacts may be used to satisfy the requirements of Table 81.401.1. The required open space shall be maintained as open space for as long as the lots created through this provision of the Ordinance remain, except in circumstances where a need to vacate is required for public health, safety or welfare.

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
12. Mineral Resources – Would the Project:			
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☐

12(a) The GPU EIR determined that impacts to mineral resources would be significant and unavoidable. The California Surface Mining and Reclamation Act (SMARA) required classification of land into Mineral Resource Zones (MRZs). The project site has been classified by the California Department of Conservation – Division of Mines and Geology (Update of Mineral Land Classification: Aggregate Materials in the Western San Diego Production-Consumption Region, 1997) as an area of "Potential Mineral Resource Significance" (MRZ-3). However, the project site is surrounded by densely developed land uses including residential and civic (including a school), 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 will 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 will 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
13. Noise – Would the Project:			
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☐
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	☐
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	☐
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐
f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐

Discussion

A Noise Report prepared by Ldn Consulting, Inc. and dated June 14th, 2021 was prepared for the Project.

12(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 will not expose people to potentially significant noise levels that exceed the allowable limits of the General Plan, Noise Ordinance, or other applicable standards for the following reasons:

General Plan – Noise Element: Policy 4b addresses noise sensitive areas and requires projects to comply with a Community Noise Equivalent Level (CNEL) of 60 decibels (dBA). 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. The project site is located east of San Pasqual Valley Road (SR-78) and south of Idaho Avenue and thus, is impacted by these roadways. Based on the noise modeling included in the noise report, it demonstrated that with the implementation of the 5-foot and 6-foot solid wall or alternately a 10-foot barrier located along the right-of-way of San Pasqual Valley Road, the on-site exterior locations for the noise sensitive land uses would comply with the 60 dBA CNEL threshold. The report indicated that the 5-foot and 6-foot solid walls should be constructed the on the southern area of Lot 13 and western portion of the site adjacent (Lots 14 through 16) or near San Pasqual Valley Road. Alternatively, a 10-foot barrier located along the right-of-way of San Pasqual Valley Road could be installed in lieu of individual noise walls at the pads. With the implementation of the noise walls/barrier, the exterior noise levels at the second-floor building facades are still anticipated to exceed the 60 dB CNEL at all proposed lots except Lots 5 and 6. Therefore, per the General Plan Noise Element a noise easement is required for the entire site, in order to mitigate the noise levels to compliance with the noise standards. With the implementation of these project design features, 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 Limited Agriculture (A70) that has a one-hour average sound limit of 50 dBA daytime and 45 dBA nighttime. The adjacent properties are zoned Limited Agriculture and Rural Residential. The Project does not involve any noise producing equipment that would exceed applicable noise levels at the adjoining property line.

Noise Ordinance – Section 36-410: The Project will not generate construction noise in excess of Noise Ordinance standards. Construction operations will occur only during permitted hours of operation. Also, it is not anticipated that the Project will operate construction equipment in excess of an average sound level of 75dB between the hours of 7 AM and 7 PM.

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.

12(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. However, the residences would be setback more than 600 feet from any transit Right-of-Way with projected noise contours of 65 dB or more; any property line for parcels zoned industrial or extractive use; or any permitted extractive uses. A setback of 600 feet ensures that the operations do not have any chance of being impacted by groundborne vibration or groundborne noise levels (Harris, Miller and Hanson Inc., Transit Noise and Vibration Impact Assessment 1995). In addition, the Project does not propose any blasting or rock crushing during the grading operations.

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.

12(c) As indicated in the response listed under Section 12(a), the Project would not expose existing or planned noise sensitive areas in the vicinity to a substantial permanent increase in noise levels that exceed the allowable limits of any applicable noise standards. Also, the Project is not expected to expose existing or planned noise sensitive areas to noise 10 dB CNEL over existing ambient noise levels.

As previously discussed, the GPU EIR determined impacts from permanent increase in ambient noise levels to be significant and unavoidable. However, the Project would have a less-than-significant impact with 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.

12(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 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.

12(e) The GPU EIR concluded this impact to be less than significant with mitigation. The project is not located within an Airport Land Use Compatibility Plan (ALUCP) for airports or within 2 miles of a public airport or public use airport. The nearest airport is the Ramona Airport, which is approximately 8.8 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.

12(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
14. Population and Housing – Would the Project:			
a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☐
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	☐	☐	☐

Discussion

14(a) The GPU EIR concluded this impact to be less than significant. The Project site is designated in the General Plan as Village Residential (VR-2) 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 20 single-family residential lots. 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 20 dwelling units will 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
15. Public Services – Would the Project:			
a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance service ratios for fire protection, police protection, schools, parks, or other public facilities?	☐	☐	☐

Discussion

15(a) The GPU EIR concluded this impact to be less than significant with mitigation for the exception of school services, which remained significant and unavoidable. 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. Water service would be provided by the City of Escondido. Minor pipeline extensions would be required to serve the Project site for water services. Sanitation would be provided by individual OWTS on each lot.

Fire and emergency protection would be provided by the Escondido Fire Department. The nearest fire station is Escondido Fire Department's Fire Station #2, located at 421 N Midway Drive in the incorporated City of Escondido. This station is approximately 1.8 miles from the Project site and has sufficient capacity to serve the Project.

Pursuant to the Project availability forms, students living within this community would attend schools of the Escondido Union School District and the Escondido Union High School District. The elementary school serving this site would be LR Green Elementary. The Middle School would be Bear Valley Middle School. High school students would attend Orange Glen High School. All applicable school fees to the Escondido Union and Escondido Union High School Districts would be required to be paid prior to the issuance of a building permit for each individual residence.

Based on the Project's service availability forms, and the discussion above, the Project would not result in the need for significantly altered services or facilities. As previously discussed, the GPU EIR determined impact to fire protection services, police protection services and other public services as significant with mitigation while school services

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

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

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

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

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

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

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
16. Recreation – Would the Project:			
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☐
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 will 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
17. Transportation and Traffic – Would the Project:			
a) Conflict with an applicable plan, ordinance or policy establishing measures of the effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths and mass transit?	☐	☐	☐
b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	☐	☐	☐
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	☐	☐	☐
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☐

e) Result in inadequate emergency access?	☐	☐	☐
f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	☐	☐	☐

Discussion

17(a) The GPU EIR concluded this impact to be significant and unavoidable. The County of San Diego previously adopted "Guidelines for Determining Significance and Report Format and Content Requirements for Transportation and Traffic" in 2006, with revisions and modifications approved in 2007, 2009, 2010 and 2011. Revisions and modifications focused primarily on metrics related to vehicle delay through 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 the State California Environmental Quality Act (CEQA), as well as a determination of the required level of CEQA analysis.

Senate Bill 743 (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 will no longer be a requirement of CEQA, unless the General Plan is amended, LOS will continue to be analyzed as part of project review.

The County of San Diego does not currently have adopted guidelines that govern the Implementation of SB 743 and analysis of projects using a VMT metric; therefore, the project is proposing a Project specific threshold of below the regional average VMT per capita. The Project is located in census tract 207.05 which has a VMT per resident of 18.99 which is below the regional average. ~~The County of San Diego published Transportation Study Guidelines dated May 2020 which were formally adopted by the County Board of Supervisors on June 24th, 2020.The Board voted to adopt a significance~~

~~threshold for projects producing VMT of 15% below the unincorporated County VMT average. Using this threshold, projects are not required to conduct additional VMT analysis if the Project site is located within a VMT Efficient Area. A VMT Efficient Area is an area on County VMT maps that modelling data already shows is at least 15% below the unincorporated County VMT average per resident. The unincorporated County VMT average per resident is 32.54. A VMT rate that is 15% below the average is 27.66 VMT per resident.~~

~~Per OPR guidance and Pub. Resources Code, § 21083, subd. (b)(2); see CEQA Guidelines, § 15064, subd. (h)(1).), "a project that falls below an efficiency-based threshold that is aligned with long-term goals and relevant plans has no cumulative impact distinct from the project impact". Therefore, according to the traffic experts at OPR, the VMT efficiency threshold used herein is the threshold for both a direct transportation impact and cumulative transportation impact.~~

~~The Project site has a VMT average of 24.71 and is located within a VMT Efficient Area. No significant direct or cumulative VMT impact would occur, and mitigation measures are not required.~~ Furthermore, on February 9, 2022, the County Board of Supervisors directed County staff to prepare a new VMT screening criteria within identified infill areas that includes any surrounding "village" identified in the General Plan that are within Transit Opportunity Areas (TOAs), excluding areas mapped as High and Very High Fire Hazard Severity Zones. Upon adoption by the Board of Supervisors, the screening criteria will allow projects located in infill areas and any surrounding "village" as defined in the County's General Plan to move forward without VMT analysis or mitigation.

Consistent with the County's analysis of infill areas and the Board of Supervisors direction to define a new VMT screening criteria for infill areas, the Project meets the infill area VMT screening threshold as the project is located in a TOA and is not located in a High or Very High Hazard Severity Zone. The Project can be presumed to have a less than significant VMT impact. No detailed VMT analysis nor mitigation measures are required. Therefore, the Project would not conflict with an applicable plan, ordinance or policy establishing measures of the effectiveness for the performance of the circulation system and impacts would be less than significant.

As previously discussed, the GPU EIR determined significant and unavoidable impacts to unincorporated County traffic and LOS standards. 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 the San Diego Association of governments (SANDAG). In October 2009, the San Diego region elected to be exempt from the State CMP and, since this decision, SANDAG has been abiding by 23 CFR 450.320 to ensure the region's continued compliance with the federal congestion management process.

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, vehicle miles traveled (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 meets the Project specific threshold and infill area VMT screening criteria and is presumed to have a less than significant VMT impact. No mitigation measures are required. ~~The Project site has a VMT average of 24.71 and is located within a VMT Efficient Area. No significant direct or cumulative VMT impact would occur, 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, Airport Land Use Compatibility Plan Area, Avigation Easement, or Overflight Area. Therefore, the Project would have a less than significant impact to air traffic patterns. The Project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

17(d) The GPU EIR concluded this impact to be significant and unavoidable. The proposed Project would not substantially alter traffic patterns, roadway design, place incompatible uses (e.g., farm equipment) on existing roadways, or create curves, slopes or walls which would impede adequate sight distance on a road. The Project will provide adequate sight distance from the proposed private access road.

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

17(e) The GPU EIR concluded this impact to be less than significant with mitigation. The proposed Project will 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. 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, pedestrian or bicycle facilities.

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

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

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

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

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

4. Feasible mitigation measures contained within the GPU EIR 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
18. Utilities and Service Systems – Would the Project:			
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	☐	☐	☐
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☐
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☐
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	☐	☐	☐
e) Result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☐

f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	☐	☐	☐
g) Comply with federal, state, and local statutes and regulations related to solid waste?	☐	☐	☐

Discussion

18(a) The GPU EIR concluded this impact to be less than significant with mitigation. The Project proposes to discharge domestic waste to on-site wastewater systems (OSWS), also known as septic systems. Discharged wastewater must conform to the Regional Water Quality Control Board's (RWQCB) applicable standards, including the Regional Basin Plan and the California Water Code. California Water Code Section 13282 allows RWQCBs to authorize a local public agency to issue permits for OSWS "to ensure that systems are adequately designed, located, sized, spaced, constructed and maintained." The RWQCBs with jurisdiction over San Diego County have authorized the County of San Diego, Department of Environmental Health (DEH) to issue certain OSWS permits throughout the County and within the incorporated cities. The Project would require DEH approval of the OSWS lay-out for the Project pursuant to DEH, Land and Water Quality Division's, "On-site Wastewater Systems: Permitting Process and Design Criteria" prior to obtaining a building permit for residential development. Therefore, the Project would be consistent with the wastewater treatment requirements of the RWQCB as determined by the authorized, local public agency.

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. The GPU EIR concluded this impact to be less than significant with mitigation. The Project would rely on an on-site wastewater treatment system would require DEH approval of the OSWS lay-out for the Project pursuant to DEH, Land and Water Quality Division's, "On-site Wastewater Systems: Permitting Process and Design Criteria" prior to obtaining a building permit for residential development.

Additionally, Project requires water service from the City of Escondido. Service Availability Letter from the City of Escondido has been provided, indicating adequate water resources and entitlements are available to serve the requested water resources. Therefore, the Project would have sufficient water supplies available, and would not require substantial pipeline extensions to serve the Project. Thus, 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 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. A Service Availability Letter from the City of Escondido Water District has been provided which indicates that there is adequate water to serve the Project.

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

18(e) The GPU EIR concluded this impact to be less than significant with mitigation. The GPU EIR concluded this impact to be less than significant with mitigation. The Project would rely on on-site wastewater systems (septic systems); 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
19. Wildfire – If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the Project:			
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☐
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts in the environment?	☐	☐	☐
d) Expose people or structures to significant risk, including downslopes or downstream flooding or landslides, as a result of runoff, post-fire instability, or drainage changes?	☐	☐	☐

Discussion

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

A Fire Protection Plan was prepared for the Project by FIREWISE 2000, Inc. dated February 11, 2021.

19(a) The GPU EIR concluded this impact to be significant and unavoidable. The site is located within the Non-Wildland/ Non-Urban and Urban Unzoned fire hazard severity zone (FHSZ). The Project site is within the authority of the Escondido Fire Department, which is contracted with the Rincon Del Diablo Fire Protection District and is located approximately 1.8 miles from the nearest fire station. The nearest fire station is Escondido Fire Department's Fire Station #2, located at 421 N Midway Drive in the incorporated City of Escondido. Based on the service availability forms 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.

A Fire Protection Plan (FPP) was prepared for the Project by FIREWISE 2000, Inc. dated February 11, 2021. The FPP considered the property location, topography, geology, combustible vegetation (fuel types), climatic conditions and fire history as part of the assessment. It considers water supply, access, structure ignitability and fire resistive building materials, fire protection systems and equipment, impacts to existing emergency services, defensible space and vegetation management. Additionally, the FPP analyzed existing fire protection measures within the vicinity of the Project site and discussed measures to be undertaken by the proposed Project for the purpose of fire protection.

Roadways within the development will also be constructed to County standards and will include hammerheads or turn-arounds at the end of each street to facilitate fire apparatus turn movement. A single street access will be constructed off Idaho Avenue, east of the intersection with San Pascual Valley Road. The Project's street frontage will be constructed to County of San Diego DPW standards.

Fire protection requirements as required by the FPP and the Escondido Fire Department would be required to be maintained by the Project applicant until the formation of the Escondido Estates Homeowners Association (HOA) to serve the residential lots is established, at which time responsibility would be transferred to the HOA. This includes in part: fuel modification zones for buildings, structures, and access roads. Additionally, as required by the FPP, at least 50 feet of clearance would be kept free of all flammable vegetation as an interim fuel modification zone during construction of all structures.

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 GPU EIR concluded this impact to be significant and unavoidable. The Project is within the Non-Wildland/ Non-Urban and Urban Unzoned fire hazard severity zone (FHSZ). 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 mitigation measures Haz-4.2 and Haz-4.3. In addition, the Project is consistent with the Zoning Ordinance and the density established under the County of san Diego General Plan. Therefore, for the reasons stated above, the Project would not be expected to experience exacerbated wildfire risks due to slope, prevailing, winds or other factors.

As previously stated, Wildfire was analyzed within the GPU EIR within Section 2.7, Hazards and Hazardous Materials and was determined to be significant and unavoidable. However, the proposed Project would have a less-than-significant impact 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 roads to serve the residential lots. 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.

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. A soils compaction report with proposed foundation recommendation would be required to be approved prior to the issuance of a final grading 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 or hard copies are available at the County of San Diego Zoning Counter, 5510 Overland Avenue, Suite 110, San Diego, 92123:

Brodie, Natalie; LSA, (March 17, 2021), Negative Cultural Resources Survey Report

Louden, Jeremy; Ldn Consulting, Inc., (May 26, 2021), Air Quality Assessment

Louden, Jeremy; Ldn Consulting, Inc. (June 14, 2021), Noise Assessment

LSA, (February 2021), Biological Resources Letter Report

X Engineering & Consulting, (June 2021), Preliminary Hydrology Study

X Engineering & Consulting, (May 4, 2021), Stormwater Quality Management Plan for Priority Development Projects

References

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

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

Appendix B

A Summary of Determinations and Mitigation within the Final Environmental Impact Report, County of San Diego General Plan Update, SCH # 2002111067 is available on the Planning and Development Services website at:
http://www.sdcounty.ca.gov/pds/gpupdate/GPU_FEIR_Summary_15183_Reference.pdf