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

Project Name: Vista II Residential Project
Project Record Numbers: PDS2022-MPA-22-008
Environmental Log Number: PDS2022-TM5647/PDS2022-MUP-22-011

APN(s): 183-060-84-00

Lead Agency Name and Address:
County of San Diego
Planning and Development Services
5510 Overland Avenue, Suite 110
San Diego, CA 92123-1239

County Staff Contact:
Daniella Hofreiter Land Use/Environmental Planner
daniellat.hofreiter@sdcounty.ca.gov
619-619-4431

Project Location:
The proposed Vista II Residential Project (project) is within unincorporated North County Metro Community Planning Area of northern San Diego County. The approximately 5.33-acre project site is at 145 Hannalei Drive, located on the border with the City of Vista.

Project Applicant Name and Address:

General Plan

Community Plan:	North County Metro
Regional Categories:	Village
Land Use Designations:	Village Residential (VR-7.3)
Density:	7.3 units per acre
Floor Area Ratio (FAR)	0.5

Zoning

Use Regulation:	Single Family Residential (RS)
Minimum Lot Size:	5.33 acres
Special Area Regulation:	C

Description of Project:
The project site is in a residential portion of the County surrounded by single-family residential neighborhoods to the west and south, undeveloped land to the north slated for residential development, and the North County Transit District SPRINTER railroad tracks and South Santa Fe Avenue to the east. Currently, the site is developed with the Stonebrooke Church, which will remain. The church is located west of the proposed condominium development. The project site consists of disturbed habitats, one unnamed earthen-bottom and concrete-lined channel that runs along the northeastern site boundary, and urban/developed land. The majority of the project site is developed, and the northwestern undeveloped portion of the property has historically been disturbed with mowing and other mechanical disturbances.

Access to the project site is provided via an existing driveway serving the site from Hannalei Drive. Potable water is provided to the site by the Vista Irrigation District (VID) with sewer service provided by Buena Sanitation District. Overhead utility lines, pole-mounted electrical lines, traverse the site.

The project includes the construction of a multi-family residential development consisting of 37 detached dwelling units. Proposed units would be three- or four-bedroom, two-story, and vary from 1,875 square feet to 2,211 square feet. There would be three different types of residential buildings, which would differ by number of bedrooms, garage size, and exterior appearance. Unit sizes are presented in Table 1, Multi-Family Unit Sizes.

Table 1
Multi-Family Unit Sizes

Units	Square Feet (without garage)	Total Square Footage (with garage)
13	1,875	2,296
14	1,959	2,462
10	2,211	2,697

The project would include 37 two-car garages (74 spaces), 37 guest parking driveway spaces, 37 on-street parking spaces, and two Americans with Disabilities Act (ADA) parking stalls. The project would also include approximately 9,762 square feet of private open space (or a minimum of 100 square feet per unit), 12,125 square feet of common open space, and landscaping consisting of climate-adaptive and low- and medium-water-use plants. Common open space would include turf, picnic tables, a barbeque area, and dog bag dispensers.

As shown on the Preliminary Grading Plan, primary access would be off Hannalei Drive, with a secondary emergency access in the northwestern area of the site connecting to the adjacent church property to the west. Private “Street A” would be constructed north of Hannalei Drive and loop west through the development. Additionally, seven private alleys would be throughout the development. A 4-foot-wide sidewalk would be constructed along the western side of private “Street A.”

Utility infrastructure would be extended and relocated on the project site. Existing sewer and water infrastructure is in Hannalei Drive and would be extended throughout the site for the residential units. Dry utilities that include electric, gas, and telecommunication infrastructure would be extended to the site from existing infrastructure, and the current overhead electrical lines that traverse the site would be undergrounded across the site and reconnected to the existing infrastructure off site.

Project drainage would include the construction of curbs and gutters along new roads, a compact biofiltration basin combination, and two underground vaults that would be used for stormwater pollutant control, hydromodification management control, and flood control detention for drainage from the project site. The northern portion of the site would still flow southeasterly via inlets and would be treated by the underground vault and Modular Wetland System (MWS) combination. The mid-flows and high-flows would be discharged to the existing channel via proposed onsite storm drain. The outlet to the channel would be protected with a riprap pad. The low flows in the northern portion of the site would be treated by the compact biofiltration system in the southern portion of the site. The southern portion of the site would flow in the southerly direction, be treated by the underground vault and biofiltration basin combination, and ultimately tie into the proposed 36-inch RCP. The proposed 36-inch RCP would tie into the existing 36-inch RCP across Hannalei Drive.

Site construction is anticipated to take approximately 24 months. Project grading would include 10,700 cubic yards of cut, 22,500 cubic yards of fill, and 11,800 cubic yards of import. A total of approximately 1,479 total truck trips would be required during site grading and 188 during the demolition phase. A maximum of 2 trucks per day is estimated during building construction. On-site phases assumed include

demolition and hazardous material abatement, site preparation, grading, perimeter retaining wall construction, building construction, utility installation, street improvements, and architectural coatings.

Discretionary Actions:
The project applicant and/or contractor of the proposed project would be required to obtain the following additional approvals and/or permits from the County

- Grading Permit
- Landscape Construction Plan
- Building Permits

These approvals require meeting certain conditions of project approval before obtaining the required permits. In addition, before the Final Subdivision Map is recorded, all conditions of project approval (which would include the mitigation measures identified in this document) must be satisfactorily completed.

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 that 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 that were not discussed in the prior EIR prepared for the General Plan, Community Plan, or zoning action; or (3) are previously identified significant effects that, as a result of substantial new information that 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 General Plan Update (GPU) establishes a blueprint for future land development in the unincorporated County that meets community desires and balances the environmental protection goals with the need for housing, agriculture, infrastructure, and economic vitality. The GPU applies to all of the unincorporated portions of San Diego County and directs population growth and plans for infrastructure needs, development, and resource protection. The GPU included adoption of new General Plan elements, which set the goals and policies that guide future development. It also included a corresponding land use map, a County Road Network Map, updates to Community and Subregional Plans, an Implementation Plan, and other implementing policies and ordinances. The GPU focuses population growth in the western areas of the County where infrastructure and services are available to reduce the potential for growth in the eastern areas. The objectives of this population distribution strategy are to (1) facilitate efficient, orderly growth by containing development within areas potentially served by the San Diego County Water Authority (SDCWA) or other existing infrastructure, (2) protect natural resources through the reduction of population capacity in sensitive areas, and (3) retain or enhance the character of communities within the unincorporated County. The SDCWA service area covers approximately the western one-third of the unincorporated County. The SDCWA 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 Program EIR (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 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 (refer to https://www.sandiegocounty.gov/content/dam/sdc/pds/gpupdate/docs/BOS_Aug2011/EIR/FEIR_7.00_-_Mitigation_Measures_2011.pdf).

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

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

1. **The project is consistent with the development density established by existing zoning, community plan or General Plan policies for which an EIR was certified.**
   The project would develop a 5.33-acre property with 37 detached multi-family residential units, which is consistent with the development density established by the General Plan and the certified GPU EIR. The proposed subdivision lot design would comply with all applicable zoning requirements, including minimum lot size and setbacks.

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 that are peculiar to the project or its site. The project site is in an area developed with single-family 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.

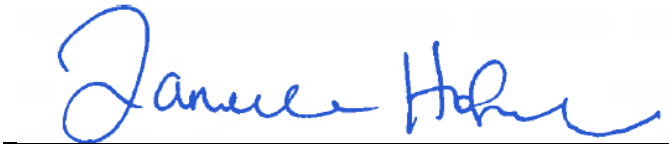
   In addition, as explained further in the 15183 Exemption Checklist below, all project impacts were adequately analyzed in the GPU EIR. The project could result in potentially significant impacts to biological resources, cultural resources, hazards and hazardous materials, noise, and transportation and traffic. However, applicable mitigation measures specified in 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 and would represent a small part of the growth that was forecast for buildout of the General Plan. 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 that 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 would undertake feasible mitigation measures specified in the GPU EIR. These GPU EIR mitigation measures would be undertaken through project design, compliance with regulations and ordinances, or the project's conditions of approval.



Signature	**September 23, 2024** Date
Daniella Hofreiter Printed Name	**Planning Manager** Title

CEQA Guidelines §15183 Exemption Checklist

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

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

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

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

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

Discussion

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

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

As described in the GPU EIR (County of San Diego 2011), the County contains visual resources affording opportunities for scenic vistas in every community. Resource Conservation Areas (RCAs) are identified in 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 west of South Santa Fe Avenue and north of Hannalei Drive within the North County Metro Community Plan Area in the unincorporated County of San Diego. The San Marcos Mountains are the closest RCA identified by the County General Plan or North County Metro Community Plan. The project site is approximately 2.4 miles southwest of the San Marcos Mountains and is not visible from this RCA due to the surrounding topography and intervening structures.

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

1(b) The GPU EIR concluded this impact to be less than significant with mitigation. State scenic highways refer to those highways that are officially designated by the California Department of Transportation (Caltrans) as scenic (Caltrans California Scenic Highway Program). Generally, the area defined within a state scenic highway is the land adjacent to and visible from the vehicular right-of-way. The dimension of a scenic highway is usually identified using a motorist's line of vision, but a reasonable boundary is selected when the view extends to the distant horizon. The scenic highway corridor extends to the visual limits of the landscape abutting the scenic highway. The project site is not within the vicinity of a state-designated scenic highway, and therefore would not have any impacts to scenic resources within a state scenic highway.

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

1(c) The GPU EIR concluded this impact to be significant and unavoidable. Visual character is the objective composition of the visible landscape within a viewshed. Visual character is based on the organization of the pattern elements line, form, color, and texture. Visual character is commonly discussed in terms of dominance, scale, diversity, and continuity. Visual quality is the viewer's perception of the visual environment and varies based on exposure, sensitivity, and expectation of the viewers.
The majority of the properties surrounding the project site are developed with single-family residential and commercial uses, with some open space and education/institutional uses. The visual character surrounding the project site is characterized by Medium Density Residential land uses, a church, an elementary school, and a rail line.

The project would not detract from, or contrast with the existing visual character and/or quality of the surrounding areas. The proposed development would be consistent with nearby Medium Density Residential land uses with similar lot sizes, dwelling unit square footage, building heights, architectural design features, and landscaping. The project would include three public parklets and private open space for every unit. The overall Landscape Concept Plan for the proposed project would consist of a variety of native and non-native trees, shrubs, and ground cover that would be planted on site. A 6-foot-tall tubular fence would be constructed along the eastern, southern, and northern perimeters of the property. In addition, existing aboveground utility power poles on the project site would be undergrounded, further enhancing the visual aesthetic of the property. The resulting uses on the project site would be similar to those developed in the surrounding area. Additionally, the proposed design of the development footprint would be compatible with uses in the immediate area. By resulting in a development similar to the existing visual environment, the project would not result in any change to visual character.

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

1(d) The GPU EIR concluded this impact to be significant and unavoidable. The project would develop a 5.33-acre property with 37 detached multi-family residential units. Construction of the project would include the installation of new streetlights along the frontage of the project on Hannalei Drive and lighting at each of the residential units. However, the project site is not located within Zone A of the County of San Diego Light Pollution Code (within 15 miles of the Mount Laguna

Observatory or the Palomar Observatory). The project would not adversely affect nighttime views or astronomical observations because the project would be required to conform to the County Light Pollution Code (Sections 51.201–51.209) to prevent spillover onto adjacent properties and minimize impacts to dark skies. Compliance with the Code would be required prior to the issuance of a Building Permit. The Code was developed by the County in cooperation with lighting engineers, astronomers, and other experts to effectively address and minimize the impact of new sources of light pollution on nighttime views. Thus, the project would not create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area.

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

Conclusion

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

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

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

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

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

	Significant Project Impact	Impact not Identified by GPU EIR	Substantial New Information
2. Agriculture/Forestry Resources – Would the project:			
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide or Local Importance as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, or other agricultural resources, to a non-agricultural use?	☐	☐	☐
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. The project site was historically used for agricultural purposes. However, the project site is zoned Single Family Residential (RS) and has been designated as Urban and Built-Up Land by the Department of Conservation, Farmland Mapping and Monitoring Program, and as such, would not be classified as an important agricultural resource. Therefore, there are no agricultural resources on the site that would be impacted.

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

2(b) The GPU EIR concluded this impact to be less than significant with mitigation. The project site is zoned Single Family Residential (RS); therefore, as mentioned above in Section 2(a), the project site would not be considered an agricultural resource. The nearest lands under Williamson Act Contract or in an agricultural preserve are located approximately 5.4 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 use

types. Therefore, the project would not conflict with existing zoning for agricultural use or a Williamson Act Contract.

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

2(c) Forestry resources were not specifically analyzed under the GPU EIR because Appendix G of the CEQA Guidelines was amended to include significance criteria for forestry resources after the release of the Notice of Preparation for the GPU EIR. The project site does not contain any forest lands as defined in California Public Resources Code, Section 12220(g); therefore, project implementation would not result in the loss or conversion of forest land to a non-forest use. The outer edge of the Elfin Forest is located approximately 7.4 miles to the southeast of the project site. Thus, due to distance, the project would have no impact on the forest. In addition, the County of San Diego does not have any existing Timberland Production Zones. Therefore, project implementation would not conflict with existing zoning for, or cause rezoning of, forest land, timberland, or Timberland Production Zones.

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

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

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

Based on a review of the County of San Diego GIS and aerial imagery, it was found that the project is within 1 mile of an active agricultural operation. Further review was conducted to ensure that project would not create a land use conflict that could lead to the conversion of this agricultural operation to a non-agricultural use, resulting in an indirect off-site impact. The project site is separated by more than 5,000 feet from this agricultural operation. Furthermore, the applicant proposes a residential project that is consistent with the surrounding area and would therefore not lead to an intensification of the surrounding land uses. Therefore, the project would not create a land use conflict with the nearby agricultural operation and would likely not result in the conversion of agricultural resources to a non-agricultural use. Therefore, the project would not result in indirect impacts to off-site agricultural resources.

As previously discussed, the GPU EIR determined impacts from direct and indirect conversion of agricultural resources (including forest resources) to be significant and unavoidable. The project would have less than significant impacts to agricultural resources. Therefore, the project would be consistent with the analysis in the GPU EIR because it would not create new impacts or

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

Conclusion

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

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

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

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

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

	Significant Project Impact	Impact not Identified by GPU EIR	Substantial New Information
3. Air Quality – Would the project:			
a) Conflict with or obstruct implementation of the San Diego Regional Air Quality Strategy (RAQS) or applicable portions of the State Implementation Plan (SIP)?	☐	☐	☐
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?	☐	☐	☐
a) Conflict with or obstruct implementation of the San Diego Regional Air Quality Strategy (RAQS) or applicable portions of the State Implementation Plan (SIP)?	☐	☐	☐

Discussion

Construction-related and operational air emissions resulting from the proposed project were estimated in an Air Quality Impact Analysis Technical Memorandum prepared by Harris & Associates, dated June 6, 2024 (Appendix C). The following responses have incorporated the analysis from the report.

3(a) The GPU EIR concluded this impact to be less than significant. San Diego County is currently designated as a non-attainment area for the federal standards for ozone (O_3) as well as the state

standards for O_3, particulate matter less than or equal to 10 microns (PM_{10}), and particulate matter less than or equal to 2.5 microns ($PM_{2.5}$). The RAQS and the region's portion of the SIP are the region's plans for attainment and maintaining air quality standards. The RAQS and SIP rely on information from the California Air Resources Board (CARB) and San Diego Association of Governments (SANDAG), including projected growth, to project future emissions and determine from that the strategies necessary for the reduction of stationary source emissions through regulatory controls. Projects that propose development that is consistent with the land use designations and growth anticipated by the local general plans and SANDAG are, by definition, consistent with the RAQS and SIP.

The project would include construction activities for and operation of up to 37 detached multi-family homes. Construction activities would include grading, building construction, paving, and architectural coating. Grading operations associated with the construction of the project would be subject to the Grading Ordinance, which requires the implementation of dust control measures and San Diego County Air Pollution Control District (SDAPCD) Rule 55. Project grading would include 10,700 cubic yards of cut, 22,500 cubic yards of fill, and 11,800 cubic yards of import. The project is consistent with the density established under the County General Plan and certified by the GPU EIR. Therefore, because the project would not increase the density or intensity of the land assumed in the GPU EIR and would not result in growth beyond that assumed in SANDAG's growth assumptions or in the General Plan projections, the project would not conflict with or obstruct implementation of the RAQS or SIP.

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

3(b) The GPU EIR concluded this impact to be significant and unavoidable. As discussed in Section 3(a), San Diego County is currently in non-attainment for O_3 under the National Ambient Air Quality Standard (NAAQS). San Diego County is also presently in non-attainment for O_3, PM_{10} and $PM_{2.5}$ under the California Ambient Air Quality Standard (CAAQS). O_3 is formed when volatile organic compounds (VOCs) and nitrogen oxides (NO_x) react in the presence of sunlight. VOC sources include any source that burns fuels (e.g., gasoline, natural gas, wood, oil), solvents, petroleum processing and storage, and pesticides. Sources of NOx include any source that burns fuel. Sources of PM_{10} and $PM_{2.5}$ in both urban and rural areas include the following: motor vehicles, wood burning stoves and fireplaces, dust from construction, landfills, agriculture, wildfires, brush/waste burning, and industrial sources of windblown dust from open lands.

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

Table 2 County of San Diego Screening Level Thresholds			
Pollutant	Emission Rate		
	Pounds/Hour	Pounds/Day	Tons/Year
Respirable Particulate Matter (PM_{10})	--	100	15
Fine Particulate Matter ($PM_{2.5}$)	--	55[a]	10[a]
Oxides of Nitrogen (NO_X)	25	250	40
Oxides of Sulfur (SO_X)	25	250	40
Carbon Monoxide (CO)	100	550	100
Lead and Lead Compounds	--	3.2	0.6
Volatile Organic Compounds (VOCs)	--	75[b]	13.7[c]

SOURCE: SDAPCD, Rules 20.1, 20.2, 20.3; County of San Diego 2007.

[a] Based on the U.S. EPA "Proposed Rule to Implement the Fine Particle National Ambient Air Quality Standards" published September 8, 2005. Also used by the South Coast Air Quality Management District.

[b] Threshold for VOCs based on the threshold of significance for VOCs from the South Coast Air Quality Management District for the Coachella Valley.

[c] 13.7 tons per year threshold based on 75 pounds per day multiplied by 365 days per year and divided by 2,000 pounds per ton.

Air emissions were calculated using California Emissions Estimator Model (CalEEMod) 2020.4.0 (CAPCOA 2021). CalEEMod is a tool used to estimate air emissions resulting from land development projects in the State of California. The model generates air quality emission estimates from construction activities and breaks down operational criteria pollutant emissions into three categories: mobile sources (e.g., traffic), area sources (e.g., landscaping equipment, consumer projects, and architectural coatings), and energy sources (e.g., natural gas heating). CalEEMod provides emission estimates of NO_X, carbon monoxide (CO), oxides of sulfur (SO_X), respirable particulate matter (PM_{10}), fine particulate matter ($PM_{2.5}$), and VOCs. Inputs to CalEEMod include such items as the air basin containing the project, land uses, trip generation rates, trip lengths, duration of construction phases, construction equipment usage, and grading areas, as well as other parameters.

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

Construction Emissions

Construction-related activities are temporary, short-term sources of air emissions. Sources of construction-related air emissions include:

- Fugitive dust from demolition and grading activities
- Construction equipment exhaust
- Construction-related trips by workers, delivery trucks, and material-hauling trucks
- Construction-related power consumption

Construction-related pollutants result from dust raised during demolition and grading, emissions from construction vehicles, and chemicals used during construction. Fugitive dust emissions vary greatly during construction and are dependent on the amount and type of activity, silt content of the soil, and the weather. Vehicles moving over paved and unpaved surfaces, demolition, excavation,

earth movement, grading, and wind erosion from exposed surfaces are all sources of fugitive dust. Construction operations are subject to the requirements established in SDAPCD Regulation 4, Rules 52, 54, and 55. Rule 52 sets limits on the amount of particulate matter that can be discharged into the atmosphere. Rule 54 sets limits on the amount of dust and fumes that can be released into the atmosphere. Rule 55 regulates fugitive dust and provides roadway dust trackout/carry-out requirements.

Heavy-duty construction equipment is usually diesel powered. In general, emissions from diesel-powered equipment contain more NO_X, SO_X, and PM than gasoline-powered engines. However, diesel-powered engines generally produce less CO and less VOCs than gasoline-powered engines. Standard construction equipment includes tractors/loaders/backhoes, rubber-tired dozers, excavators, graders, cranes, forklifts, rollers, paving equipment, generator sets, welders, cement and mortar mixers, and air compressors.

Primary inputs are the numbers of each piece of equipment and the length of each construction stage. Construction is anticipated to last approximately 24 months. CalEEMod estimates the required construction equipment for a project based on surveys, performed by the South Coast Air Quality Management District and the Sacramento Metropolitan Air Quality Management District of typical construction projects, which provide a basis for scaling equipment needs and schedule with a project's size. Air emission estimates in CalEEMod are based on the duration of construction phases; construction equipment type, quantity, and usage; grading area; season; and ambient temperature, among other parameters. Project emissions were modeled for the following stages: demolition, site preparation, grading, building construction/ architectural coatings, and paving. CalEEMod default construction equipment and usage were modeled. Table 3, Construction Parameters, summarizes the modeled construction parameters.

Table 3
Construction Parameters

Construction Phase	Phase Duration (Days)	Equipment	Amount	Hours per Day
Site Preparation	250	Rubber-Tired Dozers	3	8
		Tractors/Loaders/Backhoes	4	8
Demolition	10	Concrete/Industrial Saws	1	8
		Excavators	3	8
		Rubber Tired Dozers	2	8
Grading	85	Excavators	1	8
		Graders	1	8
		Rubber-Tired Dozers	1	8
		Tractors/Loaders/Backhoes	3	8
Building Construction	80	Cranes	1	7
		Forklifts	3	8
		Generator Sets	1	8
		Tractors/Loaders/Backhoes	3	7
		Welders	1	8
Architectural Coatings	40	Air Compressor	1	6
Paving	55	Pavers	2	8
		Paving Equipment	2	8
		Rollers	2	8

SOURCE: CalEEMod Output, Attachment 1 in Appendix C.

Construction activities would be subject to several control measures per the requirements of the County, SDAPCD Rules, and CARB Airborne Toxic Control Measures (ATCM). The following required control measures have been incorporated into the calculations of construction emissions:

- Per the County's Standard Mitigation and Project Design Consideration Grading, Clearing, and Watercourses Ordinance (Grading Ordinance), Section 87.428, and SDAPCD Rule 55, the applicant shall implement one or more of the following dust control measures during all grading activities:
  - Water actively disturbed surfaces three times a day.
  - Apply non-toxic soil stabilizers to inactive, exposed surfaces when not in use for more than 3 days. Non-toxic soil stabilizers should also be applied to any exposed surfaces immediately (i.e., less than 24 hours) following completion of grading activities if the areas would not be in use for more than 3 days following completion of grading.
  - Remove soil trackout from paved surfaces daily or more frequently as necessary.
  - Minimize the trackout of soil onto paved surfaces by installation of wheel washers.
- Per SDAPCD Rule 67, the applicant shall use regulated coatings for all architectural coating activities.
- Per CARB's ATCM 13 (California Code of Regulations, Title 13, Section 2485), the applicant shall not allow idling time to exceed 5 minutes unless more time is required per engine manufacturers' specifications or for safety reasons.

Table 4, Summary of Maximum Construction Emissions (pounds per day), presents the total projected construction maximum daily emission levels for each criteria pollutant. Note that the emissions summarized in Table 4 are the maximum emissions for each pollutant that would occur during each phase based on all modeled construction equipment (refer to Table 3) being active on the same day. Actual construction activities would vary day to day, with all equipment active on some days, and less equipment active on other days depending on the construction task. Therefore, these are the maximum emissions that would occur in a day. As shown in Table 4, maximum construction emissions would not exceed the County's SLTs for any criteria pollutants. Furthermore, project construction would be limited and would last for approximately 24 months. Therefore, the project would not violate any air quality standard or contribute substantially to an existing or projected air quality violation.

Table 4
Summary of Maximum Construction Emissions
(pounds per day)

	Pollutant					
	VOC	**NO_X**	**CO**	**SO_X**	**PM_{10}**	**$PM_{2.5}$**
Site Preparation	4	36	34	<1	9	5
Demolition	3	27	23	<1	3	1
Grading	2	20	20	<1	4	2
Building Construction/Architectural Coatings	17	25	31	<1	1	1
Paving	1	8	11	<1	<1	<1
Maximum Daily Emissions	17	36	34	<1	9	5
County Screening Level Thresholds	75	250	550	250	100	55
Significant Impact?	*No*	*No*	*No*	*No*	*No*	*No*

Operational Emissions

The project would include construction activities for and operation of up to 37 detached multi-family homes. Table 5, Summary of Project Operational Emissions (pounds per day), presents daily operational emissions associated with these four residences. As shown in Table 5, the

project's daily operational emissions would not exceed the SLTs for any criteria pollutant. Therefore, the project would not violate any air quality standard or contribute substantially to an existing or projected air quality violation.

Table 5
Summary of Project Operational Emissions
(pounds per day)

	Pollutant					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Natural Gas	<1	<1	<1	<1	<1	<1
Landscape	<1	<1	2	<1	<1	<1
Consumer Products	2	0	0	0	0	0
Architectural Coatings	<1	0	0	0	0	0
Hearths	57	1	70	<1	10	10
Vehicular Sources	2	1	10	<1	2	1
Total Operational Emissions	61	2	82	<1	12	11
SDAPCD Threshold	75	250	550	250	100	55
Significant Impact?	*No*	*No*	*No*	*No*	*No*	*No*

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

3(c) The GPU EIR concluded this impact to be significant and unavoidable. San Diego County is presently in non-attainment for the NAAQS and CAAQS for O_3. San Diego County is also presently in non-attainment for PM_{10} and $PM_{2.5}$ under the CAAQS. O_3 is formed when VOCs and NO_X react in the presence of sunlight. VOC sources include any source that burns fuels (e.g., gasoline, natural gas, wood, oil), solvents, petroleum processing and storage, and pesticides. Sources of 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.

Cumulative impacts could occur if the most intensive phases of construction for the proposed project occur simultaneously with other intensive phases of proposed projects within proximity. The most intensive construction phase for the project and for typical developments occurs during earthwork and grading activities. During these phases, the primary criteria air pollutant of concern would be PM_{10}. As discussed in the Air Quality Impact Analysis Technical Memorandum (Appendix C), the project's maximum daily emissions of PM_{10} was estimated to be 12 pounds/day, which would be well below the County's SLT of 100 pounds/day for PM_{10} 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 would contribute PM_{10}, $PM_{2.5}$, NO_X, and VOC emissions from construction/grading activities; however, it would not exceed established SLTs (refer to Section 3(b)). As described above, the County's SLTs align with attainment of the NAAQS which were developed to protect the public health, specifically the health of "sensitive" populations, including asthmatics, children,

and the elderly. Consequently, project construction would have a less than significant impact to public health. Additionally, grading and all other construction activities would be subject to the measures listed above, including the implementation of dust control measures consistent with the County of San Diego Grading Ordinance and SDAPCD Rule 55. Given the developed nature of the project vicinity, it is unlikely that other major construction activities would occur in the same area at the same time. Therefore, project construction would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard, and impacts would be less than significant.

The project would generate 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, as previously described, operational emissions of all pollutants would be below the County's recommended SLTs. As described above, the County's SLTs align with attainment of the NAAQS which were developed to protect the public health, specifically the health of "sensitive" populations, including asthmatics, children, and the elderly. Therefore, project operation would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard, and impacts would be less than significant.

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

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

3(d) The GPU EIR concluded this impact to be significant and unavoidable. Air quality regulators typically define sensitive receptors as schools (preschool–12th grade), hospitals, resident care facilities, daycare centers, residences, or other facilities that may house individuals with health conditions that would be adversely impacted by changes in air quality. The project includes the development of 37 detached multi-family residences, with associated parking and open space. The project would not be considered a point source of significant emissions. The project would generate construction emissions in the vicinity of sensitive receptors including single-family residences (as near as approximately 130 feet to the southwest), the Stonebrooke Church (approximately 50 feet to the west), and Hannalei Elementary School (approximately 50 feet to the south).

Diesel particulate matter (DPM) is the primary toxic air contaminant (TAC) of concern and is generated from fuel consumption in heavy construction equipment. Projects that would result in exposure to TACs resulting in a maximum incremental cancer risk greater than one in one million without application of best available control technology for toxics, or a threshold of 10 in 1 million for projects implementing best available control technology for air toxics or a health hazard index greater than 1, would be considered as having a potentially significant impact.

Construction of the project would result in the generation of DPM emissions from the use of off-road diesel construction activities and on-road diesel equipment used to bring materials to and from the project site. Generation of DPM from construction projects typically occurs in a single area for a short period. Construction of the project would occur over a 24-month period. The dose to which the receptors are exposed is the primary factor used to determine health risk. Dose is a function of the concentration of a substance or substances in the environment and the extent of exposure that person has with the substance. Dose is positively correlated with time, meaning that a longer exposure period would result in a higher exposure level for the Maximally Exposed Individual. The risks estimated for a Maximally Exposed Individual are higher if a fixed exposure occurs over a longer period of time.

During construction, diesel equipment would not be operating all at once on-site and would be moved across the project site as construction goes on; therefore, construction near individual receptors would be temporary and would vary by day. As such, due to the limited time of exposure, project construction is not anticipated to create conditions where the probability is greater than 10 in 1 million of contracting cancer for the Maximally Exposed Individual or to generate ground-level concentrations of noncarcinogenic TACs that exceed a hazard index greater than 1 for the Maximally Exposed Individual. Additionally, with ongoing implementation of U.S. Environmental Protection Agency (USEPA) and CARB requirements for cleaner fuels, off-road diesel engine retrofits, and new low-emission diesel engine types, the DPM emissions of individual equipment would be substantially reduced. Consequently, DPM generated during construction would not result in the exposure of sensitive receptors to substantial pollutant concentration. Therefore, the project would not expose sensitive receptors to substantial pollutant concentrations, and impacts would be less than significant.

The project would introduce additional residential homes which are considered new sensitive receptors; however, the project site is not located within 0.25 mile of any identified point source of significant emissions and is surrounded by residential homes. Similarly, the project does not propose uses or activities that would result in exposure of these sensitive receptors to significant pollutant concentrations and would not place sensitive receptors near any CO hotspots.

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

3(e) The GPU EIR concluded this impact to be less than significant. The project could produce objectionable odors during construction of the residences; however, these substances, if present at all, would only be in trace amounts (less than 1 $\mu g/m^3$). Therefore, the project would not create objectionable odors affecting a substantial number of people.

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

Conclusion

With regard to the issue area of air quality, the following findings can be made:

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

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

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

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

	Significant Project Impact	Impact not Identified by GPU EIR	Substantial New Information
4. Biological Resources – Would the project:			
a) Have a substantial adverse effect, either directly or through habitat modifications, on any candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☐
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

Potential impacts to biological resources resulting from the proposed project were analyzed in a Biological Resources Letter Report prepared by Harris & Associates, dated August 30,2024 (Appendix D). The following responses have incorporated the analysis from the report.

4(a) The GPU EIR concluded this impact to be significant and unavoidable. The site contains disturbed habitat, urban/developed land, and a non-vegetated, earthen-bottom, and concrete-lined channel that runs along the northeastern boundary of the project site. Special status plant species observed on the site include the San Diego County viguiera (*Bahiopsis laciniata*). Approximately 13 San Diego County viguiera individuals were observed surrounding the concrete and earthen portions of the channel in the northeastern corner of the project site. However, the project is designed to avoid impacts to the channel. Avoidance of the channel includes the banks of the channel where the approximately 13 San Diego County viguiera individuals occur. Project design features for avoidance of these sensitive resources would include temporary fencing during construction and permanent signage for operation of the project. Therefore, no direct impacts to San Diego County viguiera would occur and no mitigation is required. No other sensitive plant species were observed on the project site, and no sensitive plant species were determined to have a high potential to occur on the project site.

Indirect impacts to sensitive plants would primarily result from adverse edge effects during construction of the project. Edge effects could include trampling; dust, which could disrupt plant vitality in the short term; construction-related pollutant discharges; soil erosion; and runoff. Standard best management practices (BMPs), including dust suppression measures, weeds and invasive species control measures, equipment maintenance and cleaning protocols, erosion and sediment control measures (e.g., sand and gravel bags, fiber rolls, and silt fencing), use of weed-free erosion control products, and preparation and implementation of a Storm Water Pollution Prevention Plan (SWPPP), would be required of the construction contractor. The SWPPP would be prepared pursuant to the National Pollutant Discharge Elimination System (NPDES) General Construction Permit (Water Quality Order 99-08-DWQ). The SWPPP would address the potential sources and locations of stormwater contamination characteristics, impacts of specific contaminants, and temporary and permanent erosion control practices and would include water sampling data, construction practices that minimize stormwater contamination, coordination of BMPs with planned construction activities, and compliance with County, state, and federal regulations. With the implementation of construction BMPs, temporary indirect impacts to San Diego County viguiera, the only sensitive plant species observed on the project site, would be less than significant, and no mitigation would be required.

Special status wildlife species observed on the site include the monarch butterfly (*Danaus plexippus*) and red-shouldered hawk (*Buteo lineatus*). No other sensitive wildlife species were observed on the project site, and no sensitive wildlife species were determined to have a high potential to occur on the project site. No sensitive or native vegetation communities that could support sensitive wildlife species were observed on the project site, and the disturbed habitat on the project site is unlikely to support sensitive wildlife species. However, the small number of cottonwood, eucalyptus, palm, and pine trees in the disturbed habitat and urban/developed land on the project site provide suitable nesting habitat for red-shouldered hawk and suitable overwintering habitat for monarch butterfly.

Permanent impacts to approximately 0.83 acre of disturbed habitat and approximately 3.54 acres of urban/developed land would occur during project implementation (Appendix D). The small area of disturbed habitat on the project site is mowed non-native grasses and other non-native annuals that provide marginal foraging habitat for sensitive mammals, raptors, and other sensitive bird species. The mature shrubs and trees in the central portion and around the edges of the project site provide nesting habitat for sensitive birds and raptors, including red-shouldered hawk, which was observed on and surrounding the project site during the 2021 survey. Removal of the potential nesting habitat would result in potentially significant impacts to sensitive birds and raptors; however, with implementation of Mitigation Measure BIO-1, impacts would be less than significant.

Adult monarch butterflies were observed flying through the project site during the 2021 survey. No milkweed that would support monarch butterfly reproduction occurs on the project site. However, a small number of eucalyptus and pine trees that could be suitable for overwintering monarch butterflies occur on the project site. Removal of the potential overwintering habitat would result in potentially significant impacts to sensitive monarch butterflies; however, with implementation of Mitigation Measure BIO-2, impacts would be less than significant.

Indirect impacts to sensitive wildlife species during project construction could include noise, dust deposition, increased soil erosion, increased human activity, introduction of non-native species, increased presence of predators (e.g., coyotes, ravens) from trash, and increased potential of exotic species invasion due to human activity and soil disturbance. Implementation of the project has the potential to drive sensitive wildlife species from the construction area because of noise, equipment operation, and human activity. Disturbance of this potential nesting and overwintering habitat would result in potentially significant impacts to sensitive wildlife species. As previously discussed, standard construction BMPs, including dust suppression measures, weeds and invasive species control measures, equipment maintenance and cleaning protocols, erosion and sediment control measures (e.g., sand and gravel bags, fiber rolls, and silt fencing), use of weed-free erosion control products, and preparation and implementation of a SWPPP, would be required of the construction contractor during construction. Additional BMPs that would be required during construction include noise suppression measures and trash containment methods. With the implementation of construction BMPs, indirect impacts to sensitive wildlife species during construction would be less than significant, and no mitigation would be required.

Indirect impacts from project operation, including noise, human activity, and predation by domestic animals, have the potential to disturb sensitive wildlife species. However, the project site is currently developed and surrounded by urban development. Operation of the project, which includes residential land uses, would not result in a significant increase to the current level of noise and human activity in the area. Therefore, potential indirect impacts to sensitive wildlife species during operation would be less than significant, and no mitigation would be required.

Project implementation has the potential to impact bird and raptor species that are protected under the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code, Section 3504. As previously discussed, adult red-shouldered hawks were observed perched on the baseball field fences and flying over the project site during the 2021 survey, potentially nesting in mature trees on or surrounding the project site. One Cassin's kingbird nest was observed in a cottonwood tree in the central portion of the project site. Large cottonwood trees throughout the project site, primarily in the central, northern, and southeastern portions of the project site, provide nesting habitat for many bird species. If construction is conducted during the general bird breeding season (January 15 through August 31), temporary direct impacts from disturbance and displacement of nesting birds during vegetation removal could result in potentially significant direct impacts to bird species protected under the MBTA. Indirect impacts from construction noise and vibration during clearing, grubbing, and trenching activities, if conducted during the bird breeding season, could result in potentially significant indirect impacts to bird species protected under the MBTA. With implementation of Mitigation Measure BIO-1, direct and indirect impacts to bird species would be less than significant.

The GPU EIR determined significant and unavoidable impacts to candidate, sensitive, or special status species. As considered by the GPU EIR, project impacts to sensitive habitat and/or species would be mitigated through ordinance compliance and through implementation of the following mitigation measures: installation of open space fencing and signage, and breeding season avoidance. The GPU EIR identified these mitigation measures as Bio-1.6 and Bio-1.7. As the

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

BIO-1: General Nest Surveys

No grubbing, trimming, or clearing of vegetation from the project site shall occur during the general bird breeding season (January 15 through August 31). If grubbing, trimming, or clearing of vegetation cannot feasibly occur outside the general bird breeding season, a qualified biologist, as approved by the County of San Diego, shall perform a pre-construction nesting bird survey no more than 72 hours before the start of vegetation grubbing, trimming, or clearing to determine if active bird nests are present in the affected areas. If one or more active nests are found during the pre-construction survey, a 300-foot buffer (500-foot buffer for raptors or listed species) around the nest shall be established, and no disturbance shall be allowed within the buffer until a qualified biologist determines that the nest is no longer active. If there are no nesting birds (including nest building or other breeding or nesting behavior) on the project site, grubbing, trimming, or clearing shall proceed.

When construction occurs during the bird breeding season, a qualified biologist shall conduct weekly nest surveys of the area within 100 feet of construction to survey for nesting migratory birds and raptors.

BIO-2: Pre-Construction Overwintering Monarch Butterfly Survey

If grubbing, trimming, or clearing of vegetation occurs during the winter (November 1 through February 28), a qualified biologist, as approved by the County of San Diego, shall perform a pre-construction overwintering monarch butterfly survey no more than 48 hours before the start of vegetation grubbing, trimming, or clearing to confirm there are no overwintering monarch butterflies occupying vegetation on the project site. If overwintering monarch butterflies are found during the pre-construction survey, a 50-foot buffer around the occupied vegetation shall be established, and no disturbance shall be allowed within the buffer until a qualified biologist determines that monarch butterflies are no longer occupying the vegetation. If there are no overwintering monarch butterflies on the project site, grubbing, trimming, or clearing shall proceed.

4(b) As discussed in Section 4(a), no sensitive vegetation communities occur on the project site, and the project is designed to avoid impacts to the channel that runs along the northeastern boundary of the project site. Project design features for avoidance of the channel would include temporary fencing during construction and permanent signage for operation of the project.

Direct permanent impacts would occur to two non-sensitive vegetation communities and land cover types, including approximately 0.83 acre of disturbed habitat and approximately 3.54 acres of urban/developed land. Therefore, permanent direct or indirect impacts to sensitive vegetation communities from implementation of the project would be less than significant, and mitigation would not be required.

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

4(c) The GPU EIR concluded this impact to be less than significant with mitigation. The unnamed earthen-bottom and concrete-lined channel that runs along the northeastern boundary of the project site was determined to be an ephemeral non-wetland water that does not meet the U.S. Army Corps of Engineers (USACE) and County definitions of what constitutes a wetland (Appendix D). Based on the U.S. Fish and Wildlife Service's National Wetlands Inventory and U.S. Geological Survey National Hydrography Dataset, the channel is connected to Buena Creek, which is a tributary to Agua Hedionda Creek, a traditional navigable water as defined by the USACE. Based on the direct connectivity to a traditional navigable water, the channel is likely under the jurisdiction of the USACE, Regional Water Quality Control Board (RWQCB), and California Department of Fish and Wildlife pursuant to Sections 404 and 401 of the Clean Water Act and Section 1600 of the California Fish and Game Code.

As previously discussed, the project is designed to avoid impacts to the channel and the channel would remain unchanged by the project. Project design features for avoidance of the channel would include temporary fencing during construction and permanent signage for operation of the project. Additionally, drainage across the site would be treated to avoid erosion, sedimentation, and water quality impacts to the channel. The northern portion of the site would be treated by the proposed underground vault and compact biofiltration BMP before being conveyed to the proposed 36-inch RCP along the channel. The southern portion of the site would flow in a southerly direction and would be treated by the underground vault and biofiltration basin combination and ultimately ties into the proposed 36-inch RCP. The proposed 36-inch RCP would tie into the existing 36-inch RCP across Hannalei Drive. Biofiltration basins would detain runoff; riprap would decrease erosive velocities; and inlets and on-site storm drains would safely convey runoff in the historical drainage pattern. Therefore, the project would not result in a substantial adverse effect on federally protected wetlands through direct removal, filling, hydrological interruption, or other means.

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

4(d) The GPU EIR concluded this impact to be significant and unavoidable. 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 Multiple Species Conservation Program (MSCP) maps nor is it in an area considered regionally important for wildlife dispersal. The project site is completely surrounded by urban development, with single-family residential neighborhoods to the west and south, a small area of undeveloped land to the north, and the North County Transit District SPRINTER railroad tracks to the east and northeast. The project site is unlikely to provide movement and suitable dispersal areas for wildlife species or significant connections to open space areas outside the project site. Nesting and foraging opportunities within the site are limited. The presence of the urban development surrounding the project site limits large-scale east–west and north–south wildlife movement in the surrounding area.

4(e) The GPU EIR concluded this impact to be less than significant. The project site is not within the County of San Diego MSCP boundary and is not subject to the County of San Diego MSCP requirements. The project is consistent with the County's Guidelines for Determining Significance for Biology, the County's Resource Protection Ordinance (RPO), and MBTA, with the implementation of mitigation. The project would not conflict with the provisions of any adopted

Habitat Conservation Plan, NCCP, other approved local, regional, or state Habitat Conservation Plan or any other local policies or ordinances that protect biological resources.

Conclusion

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

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

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

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

4. Feasible mitigation measures contained in the GPU EIR (Bio-1.6 and Bio-1.7) as well as project-specific Mitigation Measures BIO-1 and BIO-2 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

Potential impacts to historical, archaeological, and Tribal Cultural Resources resulting from the proposed project were analyzed in a Cultural Resources Survey Report prepared by Harris & Associates, dated September 2024March 2023 (Appendix E). The following responses have incorporated the analysis from the report.

5(a) The GPU EIR concluded this impact to be less than significant with mitigation. Based on an analysis of records and a survey of the property by County-approved archaeologist, Donna Beddow, it has been determined that there are no impacts to historical resources because they do not occur on the project site. The results of the survey are provided in the Cultural Resources Survey Report (September 2024).

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, Donna Beddow, and Luiseño Native American monitor, Natane Mojado, it has been determined that one isolate (P-37-039630), which was discovered during the field survey conducted for the Cultural Resources Survey Report, is within the project footprint and would be subject to direct impacts from project implementation. However, the isolate is not a significant resource pursuant to CEQA or the RPO; therefore, direct impacts to the isolate would not constitute a significant impact and mitigation is not required. The results of the survey are provided in the Cultural Resources Survey Report (September 2024).

The Native American Heritage Commission (NAHC) was contacted on July 13, 2021, for a listing of Native American Tribes whose ancestral lands may be impacted by the project. The NAHC response was negative for resources and recommended that the list of Tribes provided be contacted for more information. All Tribal bands on the list provided by the NAHC were contacted for any information they may have regarding Sacred Sites that may be present on site. Four Tribes responded – the Jamul Band requested to be informed of the project and survey findings, the San Pasqual Band requested consultation so that they could help develop mitigation strategies to protect sites and mitigate adverse impacts, and Natane Mojado of the Luiseño Native American and Cami Mojado of the San Luis Rey Band requested that the project be conditioned with an Archaeological and Tribal Monitoring Program.

The Rincon Band responded identifying that the project is within their specific Area of Historic Interest (AHI). They have concerns that the project may impact tangible Traditional Cultural Resources, Traditional Cultural Landscapes, and potential Traditional Cultural Properties. Rincon identifies that embedded within these resources and within the AHI are Rincon's history, culture, and continuing traditional identity. They recommend that an archaeological/cultural study be conducted and that a professional Tribal monitor from the Rincon Band be present during the survey.

Although the Cultural Resources Survey Report was negative for resources, Donna Beddow of Harris & Associates recommended that an Archaeological and Tribal Monitoring Program be implemented due to the poor visibility, sensitivity of the area, and requests by Native American Tribes. The project would be conditioned with both an Archaeological and Tribal Monitoring Program and Treatment Agreement and Preservation Plan (CUL-1 and CUL-2).

As considered by the GPU EIR, potential impacts to cultural resources would be mitigated through ordinance compliance and through implementation of the following mitigation measures: grading monitoring under the supervision of a County-approved archaeologist and a Luiseño 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 would be conditioned with archaeological monitoring (Cul-2.5) that includes the following requirements:

<u>CUL-1: Archaeological and Tribal Monitoring Program</u>

Prior to approval of grading or improvement plans, the applicant shall:

- Pre-Construction
  - Contract with a County approved archaeologist to perform archaeological monitoring and a potential data recovery program during all earth-disturbing activities. The Project Archaeologist shall perform the monitoring duties before, during, and after construction.
  - Pre-construction meeting to be attended by the Project Archaeologist and a Kumeyaay or Luiseño Native American monitor to explain the monitoring requirements.

- Construction
  - Monitoring. Both the Project Archaeologist and Kumeyaay or Luiseño 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 Kumeyaay or Luiseño Native American monitor. Both the Project Archaeologist and Kumeyaay or Luiseño Native American monitor will evaluate fill soils to ensure they are negative for cultural resources.
  - If during ground disturbance activities, unique cultural resources are discovered that were not assessed by the archaeological report and/or environmental assessment prior to project approval, the following procedures shall be followed:
    - Both the Project Archaeologist and Kumeyaay or Luiseño 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 culturally-affiliated tribes as identified in the Treatment Agreement 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.
    - After consultation with the developer, Project Archaeologist, tribal monitor(s), and tribal representative(s), a decision shall be made, with the concurrence of the County Archaeologist, as to the appropriate mitigation (documentation, recovery, avoidance, etc.) for the identified cultural resources.
    - Construction activities shall not resume in the area of discovery until an agreement has been reached by all parties as to the 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/or 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:
      1. 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.
      2. 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.

3. If preservation in place or reburial is not feasible, a Research Design and Data Recovery Program shall be prepared by the Project Archaeologist in consultation with the Tribe and the Kumeyaay or Luiseño 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 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 Planning and Development Services 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 Kumeyaay or Luiseño Native American monitor.
  - If the remains are determined to be of Native American origin, the Most Likely Descendant (MLD), the NAHC shall immediately contact the MLD.
  - 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.
  - The MLD may with the permission of the landowner, or their authorized representative, inspect the site of the discovery of the Native American human remains and may recommend to the owner or the person responsible for the excavation work means for treatment or disposition, with appropriate dignity, of the human remains and any associated grave goods. The descendants shall complete their inspection and make recommendations or preferences for treatment within 48 hours of being granted access to the site.
  - 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.
- Tribal Cultural Resources
  - If tribal cultural resources are discovered, the Project Archaeologist shall conduct consultation with culturally-affiliated tribes to determine the most appropriate mitigation. Should the two parties not be able to reach consensus, then the County Archaeologist shall consider the concerns of the culturally-affiliated tribe and the Project Archaeologist, and the Director of Planning & Development Services shall make a final decision regarding appropriate mitigation.
- Fill Soils
  - The Project Archaeologist and Luiseño Native American monitor shall evaluate fill soils to determine that they are clean of cultural resources.

- Rough Grading

- Monitoring Report. Upon completion of Rough Grading, a monitoring report shall be prepared by a qualified archaeologist 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.

- Final Grading
  - Final Report. A final report shall be prepared by a qualified archaeologist 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 in order of preference have been conveyed as follows:
      - Evidence that all prehistoric materials collected during the archaeological monitoring program have been reburied.

      or

      - Evidence that all prehistoric materials collected during the grading monitoring program have been repatriated to a Native American group of appropriate tribal affinity. Evidence shall be in the form of a letter from the Native American tribe to whom the cultural resources have been repatriated identifying that the archaeological materials have been received.
    - The final report shall include evidence that all historic materials have been curated at a San Diego curation facility and shall not be curated at a Tribal curation facility or repatriated. The collections and associated records, including title, shall be transferred to the San Diego curation facility and shall be accompanied by payment of the fees necessary for permanent curation. Evidence shall be in the form of a letter from the curation facility stating that the historic materials have been received and that all fees have been paid.

<u>CUL-2: Cultural Resources Treatment Agreement and Preservation Plan</u>

A single Cultural Resources Treatment Agreement and Preservation Plan shall be developed between the applicant or their representative and culturally-affiliated Tribes. The Cultural Resources Treatment Agreement and Preservation Plan shall be reviewed and agreed to by the County prior to final signature and authorization. The Cultural Resources Treatment Agreement and Preservation Plan shall include but is not limited to the following:

- Parties entering into the agreement and contact information.
- Responsibilities of the Property Owner or their representative, Principal Investigator, archaeological monitors, Kumeyaay or Luiseño Native American monitors, and consulting tribes.
- Requirements of the Archaeological Monitoring Program including unanticipated discoveries. The requirements shall address grading and grubbing requirements including controlled grading and controlled vegetation removal in areas of cultural sensitivity, and analysis of identified cultural materials.
- Excavated soils. Project grading includes 10,700 cubic yards of cut, 22,500 cubic yards of fill, and 11,800 cubic yards of import. If excavation or export of soils increase, consultation with the culturally-affiliated tribes shall occur.
- Treatment of identified Native American cultural materials including isolates.
- Treatment of Native American human remains and associated grave goods.

- Confidentiality of cultural information including location and data.
- Negotiation of disagreements should they arise during the implementation of the Agreement and Preservation Plan.
- Regulations that apply to cultural resources that have been identified or may be identified during project construction.

5(c) 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.

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, a paleontological grading monitoring program is not required.

As considered by the GPU EIR, potential impacts to paleontological resources would be mitigated through ordinance compliance and through implementation of the following mitigation measures: grading monitoring under the supervision of a County-approved paleontologist and conformance with the County's Paleontological Resource Guidelines if resources are encountered. The GPU EIR identified these mitigation measures as Cul-3.1.

5(e) The GPU EIR concluded this impact to be less than significant with mitigation. Based on an analysis of records and archaeological surveys of the property, it has been determined that the project site does not include a formal cemetery or any archaeological resources that might contain interred human remains.

Conclusion

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

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

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

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

4. Feasible mitigation measures contained in the GPU EIR (Cul-2.5 and Cul-3.1) as well as project-specific Mitigation Measures CUL-1 and CUL-2 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 in 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 in the GPU and the GPU EIR. For example, within the Conservation and Open Space Element of the GPU, Goal COS-15 promotes sustainable architecture and building techniques that reduce emissions of criteria pollutants and greenhouse gases (GHGs), while protecting public health and contributing to a more sustainable environment. Policies, COS-15.1, COS-15.2, and COS-15.3 would support this goal by encouraging design and construction of new buildings and upgrades of existing buildings to maximize energy efficiency and reduce GHG. Goal COS-17 promotes sustainable solid waste management. Policies COS-17.1 and COS-17.5 would support this goal by reducing GHG emissions through waste reduction techniques and methane recapture. The analysis below specifically analyzes the energy use of the project.

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

The project includes the following energy conservation measures:

- Compliance with County's Water Conservation in Landscaping Ordinance, demonstrating a 40 percent reduction in outdoor use which would reduce energy required for water conveyance
- Installation of low-flow indoor water fixtures and at least one energy-efficient appliance in all residential units, reducing water and energy consumption
- Compliance with the California Code of Regulations 2019 Title 24 Part 6 Building Code. Compliance with Title 24 results in highly energy-efficient buildings
- Each proposed unit would be constructed as Electrical Vehicle (EV) Ready pursuant to CALGreenTier 2, including the installation of necessary electrical components to support future charging station
- Each proposed unit would be constructed as an all-electric structure, with no natural gas appliances or natural gas plumbing

<u>Grading and Construction</u>

Project grading includes 10,700 cubic yards of cut, 22,500 cubic yards of fill, and 11,800 cubic yards of import. During the grading and construction phases of the project, the primary energy source used would be petroleum from construction equipment and vehicle trips. To a lesser extent, electricity would also be consumed for the temporary electric power for as necessary lighting and electronic equipment. Activities including electricity would be temporary and

negligible; therefore, electricity use during grading and construction would not result in wasteful, inefficient, or unnecessary consumption of energy. In addition, natural gas is not anticipated to be required during construction of the project. Any minor amounts of natural gas that may be consumed as a result of the project construction would be temporary and negligible and would not have an adverse effect; therefore, natural gas used during grading and construction would also not result in wasteful, inefficient, or unnecessary consumption of energy.

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

Operational

Operation of the project would be typical of residential land uses, including space and water heating and landscape maintenance activities. The project would meet the California Code of Regulations Title 24 Standards for energy efficiency that are in effect at the time of construction. The projects would be designed as all-electric structures, with no natural gas appliances or plumbing. The project would also comply with the County's Landscape Ordinance and the water use application using prescriptive compliance option to reduce overall water use on site.

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

As previously discussed, the GPU EIR did not analyze energy as a separate issue area under CEQA. Energy was analyzed under the GPU and GPU EIR and has been incorporated within General Plan elements. The project would not conflict with policies within the GPU related to energy use, nor would it result in the wasteful, inefficient, or unnecessary consumption of energy resources, as specified within Appendix G of the CEQA Guidelines.

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

- Compliance with County's Water Conservation in Landscaping Ordinance, demonstrating a 40 percent reduction in outdoor use which would reduce energy required for water conveyance.
- Installation of low-flow indoor water fixtures and at least one energy-efficient appliance in all residential units, reducing water and energy consumption.

- Compliance with the California Code of Regulations, Title 24, Part 6, Building Code. Compliance with Title 24 results in highly energy-efficient buildings.
- Each proposed unit would be constructed as EV ready pursuant to CALGreen Tier 2, including the installation of necessary electrical components to support future charging station.
- Each proposed unit would be constructed as an all-electric structure, with no natural gas appliances or natural gas plumbing.

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

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

Conclusion

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

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

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

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

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

7. Geology and Soils – Would the project:	**Significant Project Impact**	**Impact not Identified by GPU EIR**	**Substantial New Information**
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving: (i) rupture of a known earthquake fault, (ii) strong seismic ground shaking or seismic-related ground failure, (iii) liquefaction, and/or (iv) landslides?	☐	☐	☐
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

Potential impacts related to geology and soils resulting from the project are evaluated in a Geotechnical Investigation prepared by Leighton and Associates, Inc., dated January 16, 2023 (Appendix F). The following responses have incorporated the analysis from the report.

7(a)(i) The GPU EIR concluded this impact to be less than significant. The project is not located in a fault rupture hazard zone identified by the Alquist-Priolo Earthquake Fault Zoning Act, Special Publication 42, Revised 1997, Fault Rupture Hazards Zones in California, or located on any known active, potentially active, or inactive fault traces. The nearest active fault is the Rose Canyon Fault Zone located approximately 11.4 miles west 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 soils compaction report with proposed foundation recommendation would be required to be approved before the issuance of a Building Permit. The report would review the qualities of the soil, its expansive characteristics, relative compaction and any soil problem which if not corrected may lead to structural defects of buildings or structures constructed or to be constructed on the site. During the review of the Building Permit, the County Building Official shall review the report and ensure measures are taken to prevent structural damage to future buildings or structures to be constructed on the site. Therefore, compliance with the California Building Code and the County Building Code would ensure that the project would not result in a significant impact.

7(a)(iii) The GPU EIR concluded this impact to be less than significant. The project is not within a “Potential Liquefaction Area” as identified in the County Guidelines for Determining the Significance for Geologic Hazards. According to the Geotechnical Investigation (June 2021) prepared by Leighton and Associates, Inc., the site has a low risk of liquefaction. Additionally, the project would be required to comply with the County’s Grading Ordinance and Building Code and conduct a soils investigation prior to approval of a Building Permit. Therefore, compliance with the California Building Code and the County Building Code would ensure that the project would not result in a significant impact.

7(a)(iv) The GPU EIR concluded this impact to be less than significant. The project is not located in a Landslide Susceptibility Area classified as “generally susceptible” as identified in the County Guidelines for Determining Significance for Geologic Hazards. This refers to the hillside area abutting the property on the west. No ancient landslides or evidence of past slope instability have been mapped on the project site. The crystalline bedrock underlying off-site slopes is not prone to landsliding. In addition, no evidence of landsliding was encountered during the site investigation for the Geotechnical Investigation (January 2023). According to the Geotechnical Investigation, landsliding is not considered a constraint to the proposed project. Landslide Susceptibility Areas were developed based on landslide risk profiles included in the Multi-Jurisdictional Hazard

Mitigation Plan, San Diego, CA (URS 2004). Landslide risk areas from this plan were based on data including steep slopes (greater than 25 percent), soil series data (SANDAG based on USGS 1970s series), soil-slip susceptibility from USGS, and Landslide Hazard Zone Maps (limited to western portion of the County) developed by the California Department of Conservation Division of Mines and Geology (DMG). Also included within Landslide Susceptibility Areas are gabbroic soils on slopes steeper than 15 percent in grade because these soils are slide prone.

As previously discussed, the GPU EIR determined less than significant impacts from exposure to seismic-related hazards and soil stability. As the proposed project would have a less than significant impact with the incorporation of project conditions for a soils compaction report, the project would be consistent with the analysis in the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance other than the information identified in the GPU EIR.

7(b) The GPU EIR concluded this impact to be less than significant. According to the Soil Survey of San Diego County, the soils on site are identified as artificial fill (undocumented), quaternary alluvial deposits (Qa), and cretaceous tonalite (Kt). However, the project would not result in substantial soil erosion or the loss of topsoil because the project would be required to comply with the Watershed Protection Ordinance (WPO) and Grading Ordinance. Compliance with these ordinances would ensure that the project would not result in any unprotected erodible soils, would not substantially alter existing drainage patterns, and would not develop on steep slopes. Additionally, the project would be required to implement BMPs per the Standard Development Project Storm Water Quality Management Plan (SWQMP) to prevent fugitive sediment. Please refer to Section 10, Hydrology and Water Quality, for a detailed discussion.

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

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

To assure that any proposed buildings are adequately supported, a Soils Engineering Report is required as part of the Building Permit process. This Report would evaluate the strength of underlying soils and make recommendations on the design of building foundation systems. The Soils Engineering Report must demonstrate that a proposed building meets the structural stability standards required by the California Building Code. The report must be approved by the County prior to the issuance of a Building Permit. With this standard requirement, in addition to compliance with the County's Grading Ordinance and Building Code and implementation of standard engineering techniques, impacts would be less than significant.

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

7(d) The GPU EIR determined impacts from expansive soils to be less than significant. The project is underlain by expansive soils. However, the project would not result in a significant impact because compliance with the Building Code, preparation of a Soils Engineering Report, and implementation of standard engineering techniques would ensure structural safety.

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

7(e) The GPU EIR concluded this impact to be less than significant. The project would rely on the existing sewer lines that serve surrounding residential, commercial, and institutional properties. As such, the project would not place septic tanks or alternative wastewater disposal systems on soils incapable of adequately supporting the tanks or system.

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

Conclusion

With regard to the issue area of geology and soils, the following findings can be made:

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

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

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

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

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

Discussion

Potential impacts related to GHG emissions resulting from the project are evaluated in a GHG Emissions Analysis Technical Memorandum prepared by Harris & Associates, dated June 6, 2024 (Appendix G). The following responses have incorporated the analysis from the report.

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

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

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

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

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

On February 14, 2018, the County Board of Supervisors (Board) adopted a CAP, which identifies specific strategies and measures to reduce GHG emissions in the largely rural, unincorporated areas of San Diego County as well as County government operations (County of San Diego 2018). The CAP aimed to meet the state's 2020 and 2030 GHG reduction targets (AB 32 and SB 32, respectively), and demonstrate progress toward the 2050 GHG reduction goal.

On September 30, 2020, the County Board of Supervisors voted to set aside its approval of the County's 2018 CAP and related actions because the Final Supplemental EIR (2018 CAP SEIR) was found to be out of compliance with CEQA. In response to this County Board of Supervisors action, the County is preparing a CAP Update to revise the 2018 CAP and correct the items identified by the 4th District Court of Appeal in San Diego within the Final 2018 CAP SEIR that were not compliant.

The County of San Diego Board of Supervisors recently adopted a new Climate Action Plan (CAP) on September 11, 2024. The Draft Supplemental Environmental Impact Report and Draft Climate Action Plan were circulated for public review at the end of 2023 and the beginning of 2024. Due to the absence of an adopted CAP when the project was submitted with a complete application in 2022, compliance with the CAP was not utilized as the threshold in determining potential

greenhouse gas (GHG) emission impacts. It should be notes that the thresholds summarized below are reflexive of several of the CAP's overarching goals including building decarbonization and the electrification of the on-road vehicle fleet.

Executive Order (EO) S-3-05 and EO B-30-15 established GHG emission reduction targets for the state, and AB 32 launched the CARB Climate Change Scoping Plan that outlined the reduction measures needed to reach the 2020 target, which the state has achieved. As required by SB 32, the California Air Resource Board's (CARB) 2017 Climate Change Scoping Plan outlines reduction measures needed to achieve the 2030 target. AB 1279, the California Climate Crisis Act, codified the carbon neutrality target as 85 percent below 1990 levels by 2045. CARB's 2022 Scoping Plan was adopted by the CARB Board December of 2022. Project impacts were assessed using a project-specific, locally appropriate threshold, as guided by CEQA Guidelines Section 15064.4. Based on the specific characteristics of this project including the Project's less than significant impact associated with Vehicle Miles Traveled (VMT), current guidance provided by the Bay Area Air Quality Management District (BAAQMD) was used to evaluate GHG emissions. For land use development projects, the BAAQMD recommends using the approach endorsed by the California Supreme Court in Center for Biological Diversity v. Department of Fish & Wildlife (2015) (62 Cal.4th 204), which evaluates a project based on its effect on California's efforts to meet the state's long-term climate goals. As the Supreme Court held in that case, a project that would be consistent with meeting those goals can be found to have a less than significant impact on climate change under CEQA. If a project would contribute its "fair share" of what would be required to achieve those long-term climate goals, then a reviewing agency can find that the impact would not be significant because the project would help to solve the problem of global climate change (62 Cal.4th 220–223). If a land use project incorporates all of the design elements necessary for it to be carbon neutral by 2045, then it would contribute its portion of what is needed to achieve the state's climate goals and would help to solve the cumulative problem. It can therefore be found to make a less than cumulatively-considerable climate impact. Because this guidance supports how a project would contribute its "fair share" of the statewide long-term GHG reduction goals, it is not specific to the BAAQMD region and can also be applied in the San Diego region. The information provided in the BAAQMD Justification Report is intended to provide the substantial evidence that lead agencies need to support their determinations about significance using these thresholds. The BAAQMD Justification Report analyzes what would be required of new land use development projects to achieve California's long-term climate goal of carbon neutrality by 2045. A new land use development project being built today needs to incorporate the following design elements to do its "fair share" of implementing the goal of carbon neutrality by 2045:

A) Projects must include, at a minimum, the following project design elements:
    1) Buildings
        a) The project will not include natural gas appliances or natural gas plumbing (in both residential and nonresidential development).
        b) The project will not result in any wasteful, inefficient, or unnecessary energy usage as determined by the analysis required under CEQA Section 21100(b)(3) and Section 15126.2(b) of the CEQA Guidelines.
    2) Transportation
        a) Achieve a reduction in project-generated VMT below the regional average consistent with the current version of the California Climate Change Scoping Plan (currently 15 percent) or meet a locally adopted SB 743 VMT target, reflecting the recommendations provided in the Governor's Office of Planning and Research's (OPR) Technical Advisory on Evaluating Transportation Impacts in CEQA:
            (i) Residential projects: 15 percent below the existing VMT per capita.
            (ii) Office projects: 15 percent below the existing VMT per employee.

(iii) Retail projects: no net increase in existing VMT.

b) Achieve compliance with off-street EV requirements in the most recently adopted version of CALGreen Tier 2.

Building Energy Use

Energy use emissions are generated by activities within buildings that use electricity and natural gas as energy sources. GHGs are emitted during the generation of electricity from fossil fuels off-site in power plants. These emissions are considered indirect but are calculated in association with a building's overall operation. Natural gas usage emits GHGs directly when it is burned for space heating, cooking, hot water heating and similar uses, whereas electricity usage emits GHGs indirectly to the extent that it is generated by burning carbon-based fuels. For the building sector to achieve carbon neutrality, natural gas usage will need to be phased out and replaced with electricity usage, and electrical generation will need to shift to 100 percent carbon-free sources. To support these shifts, new projects need to be built without natural gas and with no inefficient or wasteful energy usage.

The project would result in GHG emissions from energy used in 37 new residences. The approval of the project would be conditioned with the requirement that new residences will be required to be constructed as all-electric structures, with no natural gas appliances or natural gas plumbing.

As discussed in detail in Section 6, Energy, construction and operation of the project is not expected to result in the wasteful or inefficient use of energy. GHG emissions associated with electricity use would be eliminated as California decarbonizes the electrical generation infrastructure as committed to by 2045 through SB 100, the 100 percent Clean Energy Act of 2018. Therefore, the project would contribute its "fair share" of what is required to achieve carbon neutrality of buildings by 2045.

Transportation

GHG emissions from vehicles come from the combustion of fossil fuels in vehicle engines. Decarbonization of the transportation infrastructure serving land use development will come from shifting the motor vehicle fleet to EVs, coupled with a shift to carbon-free electricity to power those vehicles. Land use projects cannot directly control whether and how fast these shifts are implemented, but they can, and do, have an important indirect influence on California's transition to a zero-carbon transportation system. The Justification Report states that "motor vehicle transportation does not need to be eliminated entirely for the land use sector to achieve carbon neutrality, as carbon-free vehicle technology can be used (e.g., EVs powered by carbon-free electricity sources). But for that goal to be realistically implemented by 2045, California will need to reduce its per-capita VMT. How land use development is designed and sited can have a significant influence on how much VMT the project would generate." New land use development can influence transportation-related emissions in two areas related to how it is designed and built. First, new land use projects need to provide sufficient EV charging infrastructure to serve the needs of project users who would be driving EVs. Second, new land use projects can influence transportation-related GHG emissions by reducing the amount of VMT associated with the project.

SB 743 was signed into law on September 27, 2013, and changed the way that public agencies evaluate transportation impacts under CEQA. A key element of this law is the elimination of using auto delay, level of service (LOS), and other similar measures of vehicular capacity or traffic congestion as a basis for determining significant transportation impacts under CEQA. The legislative intent of SB 743 was to "more appropriately balance the needs of congestion management with statewide goals related to infill development, promotion of public health through

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

The project consists of 37 multi-family residences. The anticipated traffic to be generated by the project was determined using SANDAG's (Not So) Brief Guide of Vehicular Traffic Generation Rates for the San Diego Region. Per this guide, the project is estimated to produce 370 Average Daily Trips. The VMT Screening analysis was conducted using the County of San Diego SB-743 Location-Based Screening Maps. Based upon the criterion provided above, the proposed project would be screened out from conducting a VMT analysis as the proposed project is located within a VMT efficient area. Therefore, the project would not require further VMT analysis and would not result in a significant direct or cumulative VMT impact. Therefore, the project would be consistent with a locally adopted SB 743 VMT target which reflects the recommendations provided in the Governor's OPR Technical Advisory on Evaluating Transportation Impacts in CEQA.

The approval of the project would be conditioned with the requirement that new residences would meet the 2022 CALGreen Tier 2 voluntary requirements for EV charging infrastructure detailed in Section A4.106.8.1 of the 2022 California Green Building Standards Code (Title 24, Part 11, CALGreen). Tier 2 requires that new single-family residences are constructed with a dedicated 208/240-volt branch circuit, which would provide the necessary infrastructure to accommodate a future EV charger. Adherence to these Tier 2 voluntary requirements would be required prior to issuance of Building Permit predicated on sufficient load capacity from San Diego Gas & Electric (SDG&E) on the project site.

By meeting a locally adopted SB 743 target, and complying with the off-street EV requirements in the most recently adopted version of CALGreen Tier 2, the project would contribute its "fair share" of what is required to eliminate GHG emissions from the transportation sector by reducing levels of VMT per capita.

The project's "fair share" contribution toward the statewide goal of carbon neutrality by 2045, combined with the energy efficiency measures that would be implemented as described in Section 6, Energy, the project's consistency with the General Plan (refer to Section 11, Land Use and Planning), and the project's less than significant impact related to VMT (refer to Section 17, Transportation) demonstrates that the project would not make a cumulatively considerable contribution to GHG emissions.

Therefore, the project would not generate GHG emissions, either directly or indirectly, that would have a significant impact on the environment, and impacts would be less than significant.

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

8(b) The GPU EIR concluded this impact to be less than significant.

Executive Order (EO) S-3-05 and EO B-30-15 established GHG emissions reduction targets for the state, and AB 32 launched the CARB Climate Change Scoping Plan that outlined the reduction

measures needed to reach the 2020 target, which the state has achieved. As required by SB 32, CARB's 2017 Climate Change Scoping Plan outlines reduction measures needed to achieve the 2030 target. AB 1279, the California Climate Crisis Act, codified the carbon neutrality target as 85 percent below 1990 levels by 2045. CARB's 2022 Scoping Plan outlines the reduction measures needed to achieve the 2045 target.

As detailed in the response in Section 8(a), the project would provide its "fair share" contribution toward the statewide goal of carbon neutrality by 2045. Furthermore, project emissions would decline beyond the buildout year of the project due to continued implementation of federal, state, and local reduction measures, such as increased federal and state vehicle efficiency standards, and SDG&E's increased renewable sources of energy in accordance with Renewables Portfolio Standard (RPS) goals. Based on currently available models and regulatory forecasting, project emissions would continue to decline through at least 2050. Given the reasonably anticipated decline in project emissions that would occur post-construction, the project is in line with the GHG reductions needed to achieve the 2045 GHG emissions reduction targets identified by AB 1279.

The 2017 and 2022 Scoping Plans identify state strategies for achieving the state's 2030 and 2045 GHG emissions reduction targets codified by SB 32 and AB 1279, respectively. Measures under the 2017 and 2022 Scoping Plans scenario build on existing programs such as the Low Carbon Fuel Standard, Advanced Clean Cars Program, RPS, Sustainable Communities Strategy (SCS), Short-Lived Climate Pollutant Reduction Strategy, and the Cap-and-Trade Program. The project would comply with all applicable provisions contained in the 2022 Scoping Plan, as the adopted regulations would apply to new development or the emission sectors associated with new development.

- **Transportation** – State regulations and the 2017 and 2022 Scoping Plans' measures that would reduce the project's mobile source emissions include the California Light-Duty Vehicle GHG Standards (AB 1493/Pavley I and II), and the Low Carbon Fuel Standard, and the heavy-duty truck regulations. These measures are implemented at the state level and would result in a reduction of project-related mobile source GHG emissions. The project would provide EV charging infrastructure consistent with 2022 CALGreen Tier 2 voluntary requirements and would result in less than significant VMT impacts.
- **Energy** – State regulations and 2017 and 2022 Scoping Plans' measures that would reduce the project's energy-related GHG emissions include RPS, Title 24 Energy Efficiency Standards, and CALGreen. The project would be served by SDG&E, which has achieved 44 percent renewables as of 2019. The project's energy related GHG emissions would decrease as SDG&E increases its renewables procurement toward the 2030 goal of 60 percent. Additionally, the project would be constructed in accordance with energy efficiency standards effective at the time building permits are issued and the residences are constructed. As discussed in Section 8(a), the project would contribute its "fair share" of what is required to achieve carbon neutrality of buildings by 2045.
- **Water** – State regulations and the 2017 and 2022 Scoping Plans' measures that would reduce the project's electricity consumption associated with water supply, treatment, and distribution, and wastewater treatment include RPS and CALGreen. The project would be required to reduce indoor water consumption by 20 percent in accordance with CALGreen. Additionally, the project would be subject to all County landscaping ordinance requirements.
- **Waste** – State regulations and 2017 and 2022 Scoping Plans' measures that would reduce the project's solid waste-related GHG emissions are related to landfill methane control, increases efficiency of landfill methane capture, and high recycling/zero waste. The project would be subject to CALGreen, which requires a diversion of construction and

demolition waste from landfills. Additionally, the project would include recycling storage and would divert waste from landfills in accordance with AB 341.

The project was also evaluated for consistency with the San Diego Forward, which is the Regional Transportation Plan (RTP)/SCS that demonstrates how the region would meet its transportation-related GHG reduction goals. The project would be consistent with San Diego Forward as it would not conflict with implementation of its key goals. San Diego Forward goals include (1) the efficient movement of people and goods, (2) access to affordable, reliable, and safe mobility options for everyone, and (3) healthier air and reduced GHG emissions regionwide. As detailed in Section 8(a), the project is designed to be all-electric and EV ready consistent with the 2022 CALGreen Standards, supporting the goal of achieving healthy air and reduced GHG emissions regionwide. Tier 2 voluntary requirements do not require additional EV charging spaces for single-family residential development; however, mandatory standards already require all units to support EV infrastructure. The EV ready circuits would be designed consistent with the CALGreen requirements.

The project would not conflict with implementation of statewide GHG reduction goals, the 2017 Scoping Plan, the 2022 Scoping Plan, San Diego Forward, or the County General Plan. Therefore, the project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emission of GHGs, and impacts would be less than significant. Thus, the project would not conflict with any applicable plan, policy or regulation adopted for the purpose of reducing emissions of GHGs emissions.

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

Conclusion

With regard to the issue area of global climate change, the following findings can be made:

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

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

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

4. Feasible mitigation measures contained in the GPU EIR would be applied to the project.

	Significant Project Impact	Impact not Identified by GPU EIR	Substantial New Information
9. Hazards and Hazardous Materials – Would the project:			
a) Create a significant hazard to the public or the environment through the routine transport, storage, use, or disposal of hazardous materials or wastes or through reasonably foreseeable upset and accident conditions	☐	☐	☐

	Significant Project Impact	Impact not Identified by GPU EIR	Substantial New Information
9. Hazards and Hazardous Materials – Would the project:			
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

The following technical studies were prepared for the project to evaluate any potentially hazardous conditions at the project site that could impact the project, public, or environment:

- Phase I Environmental Site Assessment (ESA) prepared by Stantec, dated February 26, 2021 (Appendix I)
- Phase II ESA prepared by Stantec, dated May 13, 2021 (Appendix J)
- Pre-Demolition Asbestos and Lead-Based Paint Survey Report prepared by Stantec, dated May 17, 2021 (Appendix K)

The following responses have incorporated the analysis from the reports.

9(a) The GPU EIR concluded this impact to be less than significant. According to the Phase I ESA, the project site appeared to be used for agriculture as an orchard from 1939 until approximately 1946. Surrounding properties were mostly agricultural in the 1940s and 1950s. Due to the past agricultural activities on site, the Phase I ESA recommended that a Phase II ESA be performed to evaluate whether residual pesticides or heavy metals associated with herbicide applications are present above regulatory screening levels, human health risk criteria, or California hazardous waste levels, including for determining the extent to which worker protection measures and/or special off-site disposal measures may be necessary. In addition, The Phase I ESA recommended that shallow soil be sampled for arsenic and lead, which are sometimes found in shallow soil adjacent to railroads, along the eastern project site boundary. Given the age of the buildings on the project site (circa 1980), the presence of asbestos-containing materials (ACM) and lead-based paint was also determined possible by the Phase I ESA. These buildings have since been demolished and removed from the project site in accordance with all applicable local, state, and federal regulations related to ACM abatement.

The Phase II ESA, completed in May 2021 by Stantec for the proposed project, included testing a series of soil samples throughout the site for the presence of organochlorine pesticides, heavy metals (lead and arsenic), asbestos, and lead-based paint. The results found that arsenic was detected in eight of the nine soil samples but was not in concentrations above the laboratory reporting limit. Lead and arsenic were detected in all nine soil samples but neither exceeded the California Department of Toxic Substance Control (DTSC) and USEPA thresholds for these chemicals. Based on the data collected for the Phase II ESA, it was concluded that the historical agricultural activities on site and the railroad tracks adjacent to the site does not pose a significant environmental risk for residential soil, and no further assessment of soil was determined to be warranted. However, the Phase II ESA determined that given the age of the structures on site (circa 1980), the presence of ACM and lead-based paint is possible. As previously discussed, these on-site structures have since been demolished and removed from the project site. The Phase II ESA recommended that prior to demolition, a comprehensive pre-demolition ACM survey be completed in accordance with the sampling criteria of the Asbestos Hazard Emergency Response Act, and that a certified asbestos abatement contractor be retained to remove ACM in accordance with all applicable laws. The Pre-Demolition Asbestos and Lead-Based Paint Survey Report was prepared by Stantec in May 2021 to analyze the results of a series of material and paint chip samples taken from existing structures on the project site. The paint sampled did not have any concentration of lead above the laboratory reporting limit. Therefore, lead-based paint is not considered an environmental concern for the project site. However, ACMs and asbestos-containing construction materials were identified on the project site. The California Division of Occupational Safety and Health requires employers to implement specific work practices that protect workers from airborne asbestos exposure when materials are found to contain detectable concentrations of asbestos. Building materials, which contain low levels of asbestos (trace amounts), can potentially generate concentrations of airborne asbestos fibers when disturbed. These structures have been demolished and removed from the project site in accordance with all applicable local, state, and federal regulations related to ACM abatement. Given that asbestos can occur in concrete and pavement that was installed between the 1930s and the early 1980s, there remains potential for release of ACMs during demolition of the existing pavement on site.

However, the potential for accidental release of hazardous materials related to existing site conditions would be less than significant with implementation of Mitigation Measure HAZ-1, described below.

Project construction would involve the transport of gasoline and other petroleum-based products associated with construction equipment. These materials are considered hazardous as they could cause temporary localized soil and water contamination. Incidents of spills or other localized contamination could occur during refueling, operation of machinery, undetected fluid leaks, or mechanical failure. However, all storage, handling, and disposal of these materials are regulated by the DTSC, the USEPA, and the Vista Fire Protection District.

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

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

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

HAZ-1: Asbestos Removal Program

Asbestos-containing materials and asbestos-containing construction materials present on site shall be removed by a licensed abatement contractor before demolition activities. If the entire area of asbestos-containing materials and asbestos-containing construction materials is not affected by demolition activities, spot abatement of the material shall be completed. This would entail only abating the affected areas. If the identified asbestos-containing materials and asbestos-containing construction materials are going to be managed in place, then written notification to employees, tenants, contractors, or purchasers of the project site regarding the presence and location of asbestos-containing materials shall be required pursuant to the California Health and Safety Code, Section 25915. If demolition of portions of the project site includes removal of on-site portions of underground utilities (storm drains, sewer, domestic water laterals), evaluation of the asbestos content of these components must be performed before the removal process. Suspect materials identified in these locations shall be assumed positive for asbestos until sampling and analysis indicates otherwise. If during the course of the demolition of the existing pavement, suspect asbestos-containing materials are discovered that were not previously analyzed, those materials

shall be assumed positive for asbestos unless additional sampling, analysis, and/or assessment indicates otherwise.

9(b) The GPU EIR concluded this impact to be less than significant. The project is within 0.25 mile of an existing or proposed school. The closest school, Hannalei Elementary School, is approximately 100 feet south of the project site. However, the project would not emit hazardous emissions and the transport and handling of minor amounts of hazardous materials during construction and operation would comply with all applicable federal, state, and local regulations that control hazardous material handling Furthermore, the project is required to comply with applicable regulations pertaining to hazardous waste to ensure that impacts related to hazardous emissions and schools is less than significant.

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

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

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

9(d) The GPU EIR concluded this impact to be less than significant with mitigation. The project is located not within an Airport Land Use Compatibility Plan (ALUCP). The McClellan-Palomar Airport is located approximately 4.48 miles southwest of the project site, and the Pat Coyle Heliport is located approximately 4.87 miles southeast of the project site. Furthermore, the project does not propose the construction of any structure equal to or greater than 150 feet in height that would constitute a safety hazard to aircraft and/or operations from an airport or heliport.

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

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

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

OPERATIONAL AREA EMERGENCY PLAN AND MULTI-JURISDICTIONAL HAZARD MITIGATION PLAN:
The project would not interfere with this plan because it would not prohibit subsequent plans from being established or prevent the goals and objectives of existing plans from being carried out.

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.

9(f)(v) DAM EVACUATION PLAN:
The project site is not within a Dam Inundation Zone. Therefore, the project would not impair implementation of or physically interfere with an adopted Dam Evacuation Plan.

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

9(g) The GPU EIR concluded this impact as significant and unavoidable. The project is within the Moderate Fire Hazard Severity Zone (FHSZ). The project would not expose people or structures to a significant risk of loss, injury or death involving wildland fires because the project would comply with the regulations relating to emergency access, water supply, and defensible space specified in the Consolidated Fire Code for the 16 Fire Protection Districts in San Diego County, including:

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

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

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

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

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

Conclusion

The project could result in potentially significant impacts to hazards and hazardous materials; however, further environmental analysis is not required because:

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

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

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

4. Feasible mitigation measures contained in the GPU EIR (Haz-4.3) as well as project-specific Mitigation Measure HAZ-1 would be applied to the project.

	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?	☐	☐	☐

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

- Drainage Study prepared by Rick Engineering Company, dated April 17, 2024 (Appendix L)
- SWQMP for Priority Development Projects prepared by Rick Engineering Company, dated April 17, 2024 (Appendix M)

The following responses have incorporated the analysis from the reports.

10(a) The GPU EIR concluded this impact to be significant and unavoidable. Development projects have the potential to generate pollutants during both the construction and operational phases. During the construction phase, the project would prepare and implement a SWPPP. The SWPPP would implement the following typical erosion control BMPs: tackifier and Bonded Fiber Matrix on disturbed slopes; silt fencing, fiber rolls (straw wattles), gravel and sand bags, and storm drain inlet protection for sediment control; and measures to control materials management and waste management. The SWPPP would be prepared in accordance with Order No. 2009-009-DWQ, NPDES Order CAS000002 Construction General Permit (CGP) adopted by the State Water Resources Control Board (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 stormwater runoff (Table 6, Summary of Project Operational Emissions (pounds per day)). 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.

Table 6
Summary of Project Operational Emissions
(pounds per day)

Type of BMP	Description of BMP and Project Consistency
Low-Impact Development Site Design	Maintain Natural Drainage Pathways and Hydrologic Features: Drainage areas would be delineated to conserve the approximate acreage draining to each off-site area. The earthen channel that runs along the eastern boundary of the site would be preserved.
	Conserve Natural Areas, Soils, and Vegetation: The project would be developed in a least sensitive soil area, and the existing channel east of the site would remain unchanged.
	Minimize Impervious Areas: The project proposes roadway improvements.
	Minimize Soil Compaction: Soil compaction would be minimized in areas designed for biofiltration construction.
	Impervious Area Dispersion: Runoff from walkways would be directed to landscaped areas where feasible.
	Landscaping with Native or Drought-Tolerant Species: The project site would be landscaped with native and drought-tolerant species pursuant to the landscape plans.
Source Control	Prevent Illicit Discharges into the Municipal Separate Storm Sewer System: The project would provide effective irrigation and dispersion of non-stormwater discharges into landscape.
	Storm Drain Stenciling or Signage: The project would provide prohibitive dumping placards and/or signage and maintain legibility of placards and/or signage. Posted signage would be provided at public access points to deter prohibitive dumping.

Table 6 Summary of Project Operational Emissions (pounds per day)	
Type of BMP	**Description of BMP and Project Consistency**
	Additional BMPs Based on Potential Sources of Runoff Pollutants: Additional BMPs would be incorporated based on potential sources of runoff pollutants such as chemicals from household cleaners, pathogens from pet wastes, nutrients from fertilizer, pesticides and sediment from landscaping, trash and debris, and oil and grease from vehicles.
Treatment Control	MWSs: Linear biofiltration systems would be used to provide pollution control.
	Underground storage vaults: Proposed underground storage vaults would receive flows treated in the biofiltration system and release them slowly to the points of compliance.
SOURCE: Rick Engineering Company 2024 (Appendix M). NOTES: BMP = best management practice; MWS = Modular Wetland System.	

The project's conformance to the waste discharge requirements of both the CGP and MS4 stormwater 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. As the project would have a less than significant impact to water quality standards through ordinance compliance as detailed above, the project would be consistent with the analysis in the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance other than the information identified in the GPU EIR.

10(b) The GPU EIR concluded this impact to be significant and unavoidable. The site is located within Vista Hydrologic Sub-Area (HSA 904.22), which is part of the Buena Vista Hydrologic Area (HA 904.2). Under Section 303(d) of the Clean Water Act, the Buena Vista Watershed was identified as impaired for a number of pollutants, including fecal bacteria, metals/metalloids, nutrients, salinity, toxicity, pesticides, and sediment. The project could contribute to release of these pollutants; however, the project would comply with the 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, project would have a less than significant impact to water quality standards and requirements with implementation of the BMPs described in Table 6. Therefore, the project would be consistent with the analysis in the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance other than the information identified in the GPU EIR.

10(c) The GPU EIR concluded this impact to be significant and unavoidable. As stated in Sections 10(a) and 10(b), implementation of BMPs and compliance with required ordinances would ensure that project impacts are less than significant. As previously discussed, the GPU EIR determined significant and unavoidable impacts to water quality standards and requirements and groundwater supplies and recharge. However, the proposed project would have a less than significant impact to water quality standards and requirements and groundwater supplies and recharge with

implementation of the source control and treatment control BMPs described in Table 6. Therefore, the project would be consistent with the analysis in the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance other than the information identified in the GPU EIR.

10(d) The GPU EIR concluded this impact to be significant and unavoidable. The project is within the service area of the VID, which obtains water from a combination of local groundwater and surface water sources and imported water. The project would increase demand for potable water and non-potable water for irrigation. Given that Water Management Plans use projections in local planning documents and that the project is consistent with the County General Plan land use designation and zoning, potable water demands of the project (that would include groundwater) would be similar to those accounted for in the VID's 2015 Urban Water Management Plan and 2017 Water Master Plan. Consequently, significant impacts to groundwater resources are not anticipated with development of the project. In addition, the project does not involve operations that would interfere substantially with groundwater recharge.

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

10(e) The GPU EIR concluded this impact to be less than significant with mitigation. The project would not result in substantial erosion or siltation on or off-site because stormwater quality management plans are prepared for both the construction and post-construction phases of the development project. During the construction phase, the project would be required to prepare a SWPPP. The SWPPP would implement the following typical erosion control BMPs: The SWPPP would implement the following typical erosion control BMPs: tackifier and Bonded Fiber Matrix on disturbed slopes; silt fencing, fiber rolls (straw wattles), gravel and sand bags, and storm drain inlet protection for sediment control; and measures to control materials management and waste management.

The SWPPP would be prepared in accordance with Order No. 2009-009-DWQ, NPDES Order CAS000002 CGP adopted by the SWRCB on September 2, 2009. During the post-construction phase, as outlined in the PDP SWQMP dated April 17, 2024, the project would implement site design, source control and structural BMPs to prevent potential pollutants from entering stormwater 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 on-site and downstream receiving waters. The Department of Public Works would ensure that these plans are implemented as proposed.

Under existing conditions, runoff from the northern portion of the site flows southerly and then easterly to an existing channel via overland flow. The existing channel then flows southerly until it is intercepted by an existing headwall and conveyed into the existing storm drain network. Runoff from the southern portion of the site also flows south overland and then east along Hannalei Drive before it is intercepted by the existing headwall.

The development of the project site would not substantially modify the on-site drainage patterns. The northern portion of the site would drain toward the southeasterly via inlets and proposed on-site storm drains and would be treated by the proposed underground vault and compact biofiltration BMP combination. The mid-flows and high-flows would discharge to the existing channel via proposed onsite storm drain. The outlet to the channel would be protected with a riprap pad. The low flows in the northern portion of the site would be treated by the compact biofiltration system in the southern portion of the site. The southern portion of the site would flow in a southerly direction and would be treated by the underground vault and compact biofiltration system combination and ultimately ties into the proposed 36-inch RCP. The proposed 36-inch RCP would tie into the existing 36-inch RCP across Hannalei Drive. The two underground vaults would also detain the 100-year 6-hour peak flows back to less than pre-project conditions. Therefore, the project would not result in substantial erosion or siltation on- or off-site

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

10(f) The GPU EIR concluded this impact to be less than significant with mitigation. As previously discussed, the SWQMP prepared by Rick Engineering Company, dated April 17, 2024, determined that the project would not alter the existing drainage pattern in a manner that would result in flooding on- or off-site.

As discussed in Section 10(e), the development of the project site would not substantially modify the on-site drainage patterns. The northern portion of the site would drain southeast via inlets and proposed on-site storm drains and would be treated by the proposed underground vault and compact biofiltration BMP combination. The mid-flows and high-flows would discharge to the existing channel via proposed onsite storm drain. The outlet to the channel would be protected with a riprap pad. The low flows in the northern portion of the site would be treated by the compact biofiltration system in the southern portion of the site. The southern portion of the site would flow in a southerly direction and would be treated by the underground vault and compact biofiltration system combination and ultimately ties into the proposed 36-inch RCP. The proposed 36-inch RCP would tie into the existing 36-inch RCP across Hannalei Drive. Biofiltration basins would detain runoff, riprap would decrease erosive velocities, and inlets and on-site storm drains would safely convey runoff in the historical drainage pattern. Therefore, the project would not result in substantial erosion or siltation on or off site.

Through the use of Low-Impact Development practices and the underground vault and biofiltration basin, flows leaving the site would be detained to be less than pre-project conditions.

As previously discussed, the GPU EIR determined impacts to flooding as less than significant with mitigation. The project would have a less than significant impact with regard to flooding with design features and improvements consistent with GPU EIR mitigation measures (Hyd-1.2 through Hyd-1.5). Therefore, the project would be consistent with the analysis in the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance other than the information identified in the GPU EIR.

10(g) The GPU EIR concluded this impact to be less than significant with mitigation. Pursuant to the Drainage Study prepared by Rick Engineering Company and dated February 27, 2024, the project would detain stormwater on site and would not increase peak flows; therefore, the project would

not contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems.

As previously discussed, the GPU EIR determined impacts to exceed capacity of stormwater systems as less than significant with mitigation. With implementation of treatment control BMPs, the proposed project would have a less than significant impact with regard to exceeding the capacity of stormwater systems. Therefore, the project would be consistent with the analysis in the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance other than the information identified in the GPU EIR.

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

As previously discussed, the GPU EIR determined impacts to water quality standards and requirements as significant and unavoidable. However, the project would have a less than significant impact to water quality standards with the implementation of project conditions listed in 10(a). The conditions are consistent with the GPU EIR Mitigation Measures Hyd-1.2 through Hyd-1.5. Therefore, the project would be consistent with the analysis in the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance other than the information identified in the GPU EIR.

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

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

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

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

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

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

The site is not within a Dam Inundation Zone. Therefore, the project would not expose people or structures to a significant risk of loss, injury, or death involving flooding as a result of the failure of a levee or dam.

As previously discussed, the GPU EIR determined impacts from dam inundation and flood hazards and emergency response and evacuation plans as less than significant with mitigation. The project would have a less than significant impact for the reasons detailed above. Therefore, the project would be consistent with the analysis in the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance other than the information identified in the GPU EIR.

10(m)(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. Refer to Section 7(a)(iv).

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

Conclusion

With regard 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 in the GPU EIR (Hyd-1.2 through Hyd-1.5) would be applied to the project as BMPs. The mitigation measures, as detailed above, requires compliance with the Guidelines for Determining Significance for Hydrology and Water Quality, as well as for Dam Inundation, the WPO, the Stormwater Standards Manual, and the RPO.

	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 include the introduction of new infrastructure such as major roadways, water supply systems, or utilities to the area. The project is for a minor residential subdivision and is consistent with the County Zoning Ordinance Land Use Regulation and density established under the County General Plan. Therefore, the project does not propose any development which would be expected to divide the surrounding established community.

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

11(b) The GPU EIR concluded this impact to be less than significant. The project is a development consisting of 37 detached dwelling units on a 5.33-acre site. The residential use types and density are consistent with the Village Residential (VR-7.3) land use designation and with the County Zoning Ordinance. While the project site is zoned Single Family Residential (RS), the proposed detached dwelling units would be located all on one 5.33-acre lot, and therefore, must be considered “multi-family” units. Given that the proposed units are detached, they are consistent with the Single Family Residential (RS) zoning regulations. Additionally, with the processing of the Major Use Permit, the proposed development is granted a more flexible design for development of an area than is generally possible under conventional zoning regulations. This results in a more economical and efficient use of land while providing additional amenities associated with development in Village areas. Although the current zoning designation permits only one detached single-family home per lot, the MUP would allow the development of more dwelling units per lot while remaining consistent with the General Plan's density standards for the site. The project site is zoned VR 7.3, which allows for 39 dwelling units per acre. In addition to the increase in density, , the MUP will reduce setback requirements, further enhancing land efficiency without compromising amenities. Therefore, the project would not conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect, including policies of the General Plan and Community Plan.

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

Conclusion

With regard to the issue area of land use and planning, the following findings can be made:

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

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

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

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

	Significant Project Impact	Impact not Identified by GPU EIR	Substantial New Information
12. Mineral Resources – Would the project:			
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐
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?	☐	☐	☐

Discussion

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

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

12(b) The GPU EIR concluded this impact to be significant and unavoidable. The project site is located in an MRZ-3 zone. There are no active mines on the project site. Therefore, no potentially significant loss of availability of a known mineral resource of locally important mineral resource recovery (extraction) site delineated on a local General Plan, specific plan or other land use plan

would occur as a result of this project. Therefore, the project would be consistent with the analysis in the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance other than the information identified in the GPU EIR.

Conclusion

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

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

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

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

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

	Significant Project Impact	Impact not Identified by GPU EIR	Substantial New Information
13. Noise – Would the project:			
a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☐
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

Potential noise impacts resulting from the proposed project were analyzed in a Noise Impact Analysis Technical Memorandum prepared by Harris & Associates, dated August 14, 2023 (Appendix N). The following responses have incorporated the analysis from the report.

13(a) The GPU EIR concluded this impact to be less than significant with mitigation. The area surrounding the project site consists of residences, institutional, and commercial uses. With implementation of a Construction Noise and Vibration Management Plan (NOI-1), the project would not expose people to potentially significant noise levels that exceed the allowable limits of the General Plan, Noise Ordinance, or other applicable standards for the following reasons:

General Plan – Noise Element: The Noise Element of the County General Plan includes a noise/land use compatibility matrix for assessing the suitability of different categories of planned land uses based on exterior ambient noise level exposure (Table N-1 from the County General Plan) (County of San Diego 2011). For the project site's zoning designation (Single Family Residential), the Noise Element specifies projects generating a Community Noise Equivalent Level (CNEL) of 60 decibels (dBA) as normally acceptable and up to 75 CNEL as conditionally acceptable. Exterior noise levels up to 65 dBA CNEL are normally acceptable for multi-family residential development. Noise levels exceeding 75 CNEL are generally unacceptable for residential uses. In addition, the County defines a noise standard of 45 dBA CNEL for residential interior areas. A land use in an area identified as "acceptable" indicates that standard construction methods would attenuate exterior noise to an acceptable indoor noise level and that people can carry out outdoor activities with minimal noise interference. For land uses indicated as "conditionally acceptable," structures must be able to attenuate the exterior noise to the indoor noise level limit (45 dBA CNEL). Projects that could produce noise in excess of these noise standards are required to incorporate design measures or mitigation as necessary to comply with the Noise Element.

Noise Ordinance: Sections 36.401 through 36.435 of the Noise Ordinance pertain to noise requirements and enforcement of violations. Section 36.404 of the Noise Ordinance states that the exterior property line noise limits for Single Family Residential zoning is 50 1-hour average dB between 7 a.m. and 10 p.m. and 45 1-hour average dB between 10 p.m. and 7 a.m. Sections 36.408 and 36.409 of the Noise Ordinance state that construction operations shall not occur between 7 p.m. and 7 a.m., on Sundays, or holidays, and that average sound levels shall not exceed 75 dBA for an 8-hour period between 7 a.m. and 7 p.m.

Construction

Construction of the proposed project would have the potential to result in temporary noise level increases as a result of operation of heavy equipment. The three noisiest pieces of construction equipment (concrete saw, excavator, dozer) that could be required for the project were assumed to operate simultaneously in the same location and would have the potential to generate noise levels up to 84.6 dBA at 50 feet from the construction site. An average distance of 50 feet from the project boundary is assumed for worst-case noise levels because individual equipment location would vary throughout a given day, and all equipment would not operate in the same location on a given day.

Construction equipment noise would be considered significant if it exceeds an 8-hour average exterior noise level of 75 dBA or a maximum impulsive noise level of 82 dBA at an occupied residential use. Construction activities would take place across the project site within the allowable hours of 7 a.m. and 7 p.m.; thus, noise exposure at individual residences would vary. The nearest receiver, the adjacent church, is approximately 50 feet west of the project site. At this distance, construction would have the potential to reach 84.6 dBA, which exceeds the average exterior

noise level of 75 dBA. However, the project would be required to implement a Construction Noise and Vibration Management Plan (NOI-1) to comply with the noise levels limits specified in Sections 36.408 and 36.409 of the Noise Ordinance. Therefore, the project would comply with the Noise Ordinance, and impacts would be less than significant, with implementation of Mitigation Measure NOI-1.

Operation

Implementation of the proposed project would not cause any roadway segment to exceed 60 CNEL or result in an increase of the noise level of 10 CNEL or more above existing noise levels. Therefore, operational noise related to off-site vehicle traffic would be less than significant.

A multi-family townhome development would likely be exposed to and generate occasional nuisance noise (i.e., intermittent or temporary neighborhood noise from sources such as amplified music, barking dogs, and landscape maintenance equipment that may be disturbing to other residents). Section 36.404 of the County Municipal Code contains the noise control standards for the County and prohibits nuisance noise from exceeding the noise standards at any time. Compliance with the County Municipal Code would limit exposure to excessive nuisance noise. Additionally, nuisance noises would be different from each other in kind, duration, and location. Therefore, the overall effects would be separate and, in most cases, would not affect the receptors at the same time. Therefore, operational nuisance noise would not result in a significant impact.

Heating, ventilation, and air conditioning (HVAC) equipment would be at ground-level locations on the side of the proposed townhomes. This HVAC equipment would have the potential to generate noise levels that average 56 dBA at a distance of 7 feet and may run continuously during the day and night (Appendix N). As such, HVAC equipment could have the potential to generate noise that may exceed the County's hourly noise limit for sensitive receptors of 50 dBA during daytime hours (45 dBA at night). The nearest receptor is a church, approximately 50 feet west from each property line. At this distance, noise from HVAC equipment would be approximately 36.9 dBA at the property line, which complies with the County Municipal Code limit of 50 dBA during daytime hours and 45 dBA during nighttime hours. Therefore, operational noise from the proposed HVAC systems would be less than significant.

Noise sources from the proposed parking lot would include car alarms, door slams, radios, and tire squeals. These sources typically range from approximately 51 to 66 dBA at a distance of 10 feet and are generally short term and intermittent. Parking lots have the potential to generate temporary noise levels that exceed 50 dBA, depending on the location of the source; however, noise sources from the parking lot would be different from each other in kind, duration, and location. Therefore, the overall effects would be separate and, in most cases, would not affect noise-sensitive receptors at the same time, and noise generated from the proposed parking lot would not exceed the 1-hour average sound level limit of 50 dBA. Therefore, operational noise from the proposed parking lot would be less than significant.

Operation of the North County Transit District SPRINTER rail line adjacent to the eastern boundary of the project site has the potential to generate noise levels exceeding the noise level limits established by the County General Plan Noise Element and Noise Ordinance. However, per the California Building Industry Association v. BAAQMD decision, the California Supreme Court ruled that the purpose of CEQA is to analyze impacts of a project on the existing environment. It is not to analyze impacts of the existing environment on future projects or to analyze the impacts of the project itself on its own future users or residents. Project design would be required to consider potential noise exposure in demonstrating consistency with building codes; however, project exposure to existing noise is not a CEQA impact. Nevertheless, conflicts with County General Plan

Noise Element may be considered a potentially significant land use impact. Policy N 2.1 of the Noise Element discourages new noise-sensitive land uses from locating, and existing noise-sensitive land uses from expanding, in areas where noise levels are 60 dB CNEL or above. Additionally, Policy N-2.2 requires noise attenuation to be incorporated into balcony and patio design where exterior noise would exceed 65 dBA at a proposed mixed-use residential development.

During operations, the project may be exposed to noise from the SPRINTER rail line, adjacent to the east of the project site and west of South Santa Fe Avenue. According to the Vista General Plan 2030 (2012), at a distance of approximately 100 feet from the center of the SPRINTER rail line, noise levels could be up to 68 dBA, which would exceed the screening level of 60 dBA CNEL for residences and the exterior noise level standard of 65 dBA CNEL for multi-family residences. The 60 dBA CNEL screening level indicates that interior noise levels may exceed an acceptable interior noise level of 45 dBA CNEL without consideration for noise attenuation. As such, a noise easement would be required for the portion of the site within 300 feet of the SPRINTER rail line, and an interior noise study would be required to confirm exterior and interior noise levels at the project site meet General Plan standards. Compliance with the interior noise standard is also required in accordance with the existing California Building Code before obtaining a Building Permit.

Residential units with the potential to be exposed to exterior noise levels in excess of 60 dBA CNEL would be designed to include window and wall construction that would reduce interior noise levels to an acceptable level. Adequate air circulation and provision of fresh air would be ensured to allow windows to remain closed for extended intervals of time in order to maintain acceptable interior noise levels. The building design would include a mechanical ventilation system that would meet the criteria of the International Building Code (2019 California Building Code, Chapter 12, Section 1202) to ensure that windows would be able to remain permanently closed.

Additionally, the exterior noise level standard of 65 dBA CNEL applies to usable open space such as yards, decks, and balconies. Residential units with a balcony or patio within 140 feet of the railroad centerline would potentially be exposed to exterior noise levels above 65 dBA CNEL. As required by Policy N-2.2, as a condition of approval, these residential units would be designed to include a solid noise barrier that reduces noise exposure in the balcony or patio to below 65 dBA CNEL but does not completely enclose the usable area. Decorative six-foot-high fencing and landscaping on the northwestern boundary of the project site between residences and the rail line may provide additional noise reduction, but wall specifications are not available at this time to estimate potential noise attenuation. However, this potential noise-related land use impact would be less than significant with implementation of conditions of approval to prepare an interior noise study and to install solid noise barriers on residential units exposed to railroad noise.

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

<u>NOI-1: Construction Noise and Vibration Management Plan</u>

Measures to achieve the Noise Ordinance standards would be included on construction plans that are submitted to the County of San Diego Planning and Development Services for approval before issuance of the grading permit. Measures in the Construction Noise and Vibration Management Plan may include but not be limited to the following:

- Construction activities that could generate high noise or vibration levels at receptors shall be scheduled during times that would have the least impact on sensitive receptor locations. This could include restricting construction activities in the areas of potential impact to the middle hours of the workday, such as from 10:00 a.m. to 4:00 p.m., Monday through Friday, when residents are least likely to be home.
- Stationary construction noise sources, such as temporary generators, shall be as far from nearby noise-sensitive receptors as possible.
- Trucks shall be prohibited from idling along streets serving the construction site where noise-sensitive residences are.
- Construction equipment shall be outfitted with properly maintained, manufacturer-approved, or recommended sound and vibration abatement means on air intakes, combustion exhausts, heat dissipation vents, and interior surfaces of engine hoods and power train enclosures.
- Construction laydown and vehicle staging areas shall be positioned (to the extent practical) as far from noise-sensitive land uses as feasible.
- Simultaneous operation of construction equipment shall be limited or construction time shall be limited to within an hour to reduce the hourly average noise level and vibration exposure.
- Temporary sound barriers or sound blankets may be installed between construction operations and adjacent noise-sensitive receptors. Due to equipment exhaust pipes being approximately seven to 8 feet above ground, a sound wall at least 10 feet in height above grade located along the western and southern property lines between the project and neighboring residences would mitigate noise levels to within acceptable levels. To effectively reduce noise levels, the sound barrier should be constructed of a material with a minimum weight of 2 pounds per square foot with no gaps or perforations and should remain in place until the conclusion of demolition, grading, and construction activities.

13(b) The GPU EIR concluded this impact to be less than significant with mitigation. Operation of the SPRINTER rail line has the potential to generate vibration on the project site. However, per the California Building Industry Association v. BAAQMD decision, the California Supreme Court ruled that the purpose of CEQA is to analyze impacts of a project on the existing environment. It is not to analyze impacts of the existing environment on future projects or to analyze the impacts of the project itself on its own future users or residents. Project design would be required to consider potential vibration exposure in demonstrating consistency with building codes; however, project exposure to existing vibration is not a CEQA impact. Therefore, this analysis focuses on the potential for the project to generate vibration at surrounding land uses.

Construction techniques that commonly result in excessive vibration, such as blasting and pile driving, are not anticipated for the proposed project. Groundborne vibration occurring as part of the project would result from construction equipment, such as earth movement by trucks. The nearest structure to the project site is the adjacent church approximately 50 feet to the west. Construction equipment would have the potential to result in groundborne vibration above the Federal Transit Administration threshold of 0.014 inch per second threshold at up to 150 feet from the project construction area. However, off-site exposure to such groundborne vibration would be temporary because it would be limited to the short-term construction period. Additionally, a Construction Noise and Vibration Management Plan (NOI-1) would be implemented to achieve Noise Ordinance standards for construction to minimize vibration. Finally, per Section 87.208 of the County's Grading Ordinance, all property owners within 300 feet of the construction area would be notified prior to the start of grading, when the most intense construction would occur, which would reduce nuisance impacts by allowing receptors to prepare. Therefore, temporary impacts would be less than significant with implementation of Mitigation Measure NOI-1. Following construction, the proposed residences would not generate groundborne vibration.

As previously discussed, the GPU EIR determined impacts to excessive groundborne vibration as less than significant with mitigation. The project would have a less than significant impact with implementation of Mitigation Measure NOI-1. Therefore, the project would be consistent with the analysis in the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance other than the information identified in the GPU EIR.

13(c) The GPU EIR concluded this impact to be significant and unavoidable. As indicated in the response listed under Section 13(a), implementation of the proposed project would not cause any roadway segment to exceed 60 CNEL or result in an increase of the noise level of 10 CNEL or more above existing noise levels. Additionally, operational noise from the proposed residences, HVAC systems, and parking lot would be less than significant. As indicated in the response listed under Section 13(a), the project would not expose existing noise-sensitive areas in the project vicinity to a substantial permanent increase in noise levels that exceed the allowable limits of any applicable noise standards. Also, the project would not expose existing noise-sensitive areas to noise levels of 10 dB CNEL over existing ambient noise levels as required by the County Noise Ordinance.

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

13(d) The GPU EIR concluded this impact to be less than significant with mitigation. Project operations would not create substantial temporary or periodic increases in ambient noise levels in the project vicinity. Construction noise would be subject to the County 75 dBA 8-hour average requirement between 7 a.m. and 7 p.m. at the boundary of any occupied property.

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

13(e) The GPU EIR concluded this impact to be less than significant with mitigation. The project site is not within the boundaries of an Airport Land Use Plan and is not within 2 miles of a public use airport or private airstrip. The nearest airports are the McClellan-Palomar Airport, approximately 4.5 miles to the southwest, and Oceanside Municipal Airport, approximately 7.8 miles to the northwest. The project site is outside the noise contours for either airport. As such, the project would not expose residents to excessive noise levels and no impacts would occur. Therefore, the project would be consistent with the analysis in the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance other than the information identified in the GPU EIR.

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

Conclusion

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

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

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

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

4. Feasible mitigation measures contained in the GPU EIR (Noi-1.1) as well as project-specific Mitigation Measure NOI-1 would be applied to the project.

	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 General Plan Land Use Designation for the project site is Village Residential (VR-7.3), which allows for 7.3 units per acre. Given that the project site is 5.33 acres, the allowable buildout of the project site is 39 dwelling units. Therefore, since the project would develop 37 detached multi-family residential units, the proposed project is consistent with the development density evaluated by the GPU EIR for this setting. The Zoning Use Regulation for the site is Single Family Residential (RS). The project is consistent with density and lot size requirements of the General Plan and Zoning Ordinance. The project is consistent with the density allowable under the General Plan, and thus would not induce substantial unplanned population growth in the area as development of the site was accounted for within the GPU. In addition, the project does not propose any physical or regulatory change that would remove a restriction to or encourage population growth in the area.

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

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

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

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

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

Conclusion

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

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

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

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

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

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

Discussion

15(a) The GPU EIR concluded this impact to be less than significant with mitigation for all public services with the exception of school services, which would remain significant and unavoidable. The project would develop a 5.33-acre property with 37 detached multi-family residential units. The project does not involve the construction of new or physically altered governmental facilities including but not limited to fire protection facilities, sheriff facilities, schools, or parks to maintain acceptable service ratios, response times or other performance service ratios or objectives for any public services. Therefore, the project would not have an adverse effect on the environment because the project does not require new or significantly altered services or facilities to be constructed.

Water service would be provided by the VID from an existing 8-inch water line on Hannalei Drive. A service availability letter from the VID (Appendix O) indicated that it has sufficient capacity to serve the project.

Sewer service would be provided by Buena Sanitation District from an existing sewer line on Hannalei Drive. A service availability letter from the Buena Sanitation District (Appendix P) indicated that it has sufficient capacity to serve the project.

Fire and emergency protection would be provided by the Vista Fire Protection District. The nearest fire station is the Vista Fire Department Station 4, located at 2121 Thibodo Road, Vista, California 92083, approximately 1.6 miles (driving) south of the project site. A service availability letter from the Vista Fire Protection District (Appendix Q) indicated that the station has sufficient capacity to serve the project.

Pursuant to the service availability letter from the Vista Unified School District (Appendix R), students living within this community would attend schools of the Vista Unified School District.

Therefore, the project would not have an adverse physical effect on the environment because the project does not require new or significantly altered services or facilities to be constructed. Based on the 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 in the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance other than the information identified in the GPU EIR.

Conclusion

With regard to the issue area of public services, the following findings can be made:

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

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

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

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

	Significant Project Impact	Impact not Identified by GPU EIR	Substantial New Information
16. Recreation – Would the project:			
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☐
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 would require the removal of existing on-site recreational facilities, including three baseball fields, a snack shack, covered seating for the baseball field, and associated parking. The project would also increase the use of existing parks and other recreational facilities for new project residents; however, the project would be subject to Park Land Dedication Ordinance fees. As the project would have a less than significant impact for the reasons detailed above, the project would be consistent with the analysis in the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance other than the information identified in the GPU EIR.

16(b) The GPU EIR concluded this impact to be less than significant with mitigation. While the project does not include the construction of new active recreational facilities, the project would include approximately 9,762 square feet of private open space (or a minimum of 100 square feet per unit), 12,125 square feet of common open space, and landscaping consisting of climate-adaptive and low- and medium-water-use plants. Common open space would include turf, picnic tables, a barbeque area, and dog bag dispensers. Given the limited scope of these common open space uses, the construction of these on-site recreational facilities would not have an adverse physical effect on the environment. As the project would have a less than significant impact for the reasons detailed above, the project would be consistent with the analysis in the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance other than the information identified in the GPU EIR.

Conclusion

With regard to the issue area of 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 in the GPU EIR would be required because project-specific impacts would be less than significant.

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

The following technical studies were prepared for the project related to transportation and traffic:

- VMT Screening prepared by CR Associates, dated April 11, 2023 (Appendix S)
- Local Transportation Assessment prepared by CR Associates, dated April 2023 (Appendix T)

The following responses have incorporated the analysis from the reports.

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 LOS. These guidelines presented an evaluation of quantitative and qualitative analyses and objective and predictable evaluation criteria and performance measures for determining whether a land development project or a public project like a community plan has a significant traffic impact on the environment pursuant to CEQA, as well as a determination of the required level of CEQA analysis.

SB 743 was signed into law on September 27, 2013, and changed the way that public agencies evaluate transportation impact under CEQA. A key element of this law is the elimination of using auto delay, LOS, and other similar measures of vehicular capacity or traffic congestion as a basis for determining significant transportation impacts under CEQA. The legislative intent of SB 743 was to "more appropriately balance the needs of congestion management with statewide goals related to infill development, promotion of public health through active transportation, and reduction of greenhouse gas (GHG) emissions." According to the law, "traffic congestion shall not be considered a significant impact on the environment" within CEQA transportation analysis.

In response, 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 VMT be the primary metric for evaluating transportation impacts under CEQA. VMT measures the number of vehicle trips generated and the length or distance of those trips.

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

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

The project consists of 37 detached multi-family residential units. The anticipated traffic to be generated by the project was determined using SANDAG's (Not So) Brief Guide of Vehicular Traffic Generation Rates for the San Diego Region. Per this guide, the project is estimated to produce 370 Average Daily Trips. However, per the County of San Diego TSG, a project may be screened out from conducting a detailed VMT analysis based on the project's size, location, transit availability, and provision of affordable housing. These screening thresholds are meant to quickly identify when a project should be expected to cause a less than significant impact without conducting a detailed study. The screening threshold criteria used for this project is the Map-Based Screening for Residential Project criteria. Under this criteria, residential projects located within a VMT efficient area may be presumed to have a less than significant impact absent substantial evidence to the contrary. A VMT efficient area for residential projects is any area with an average VMT per resident 15 percent below the baseline average for the entire San Diego County region, including the incorporated cities. Similarly, OPR's technical advisory suggests that lead agencies may screen out VMT using the threshold for Map-Based Screening for Residential and Office Project, which claims that residential and office projects located in areas with low VMT

per capita, and that incorporate similar features (i.e., density, mix of uses, transit accessibility), tend to exhibit similarly low VMT.

The VMT Screening analysis was conducted using the County of San Diego SB-743 Location-Based Screening Maps. Based upon the criterion provided above, the proposed project would be screened out from conducting a VMT analysis as the proposed project is located within a VMT efficient area. Therefore, the project would not require further VMT analysis and would not result in a significant direct or cumulative VMT impact, and mitigation measures are not required. 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. As the project would have a less than significant impact for reasons stated above, the project would be consistent with the analysis in the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance other than the information identified in the GPU EIR.

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

Section 15064.3 of the CEQA Guidelines details new regulations, effective July 1, 2020, that sets forth specific considerations for evaluating a project's transportation impacts. Generally, VMT is the most appropriate measure of transportation impacts. VMT refers to the amount and distance of automobile travel attributable to a project. Other relevant considerations may include the effects of the project on transit and non-motorized travel. Except as provided regarding roadway capacity, a project's effect on automobile delay shall not constitute a significant environmental impact. As discussed in Section 17(a), the project would be screened out from a VMT analysis and would not result in a significant direct or cumulative VMT impact, and mitigation measures are not required.

As previously discussed, the GPU EIR concluded this impact to be significant and unavoidable. As the project would not conflict with an applicable congestion management program, the project would be consistent with the analysis in the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance other than the information identified in the GPU EIR.

17(c) The GPU EIR concluded this impact to be less than significant with mitigation. The project site is not within an ALUCP. As discussed in Section 9(d), The McClellan-Palomar Airport is approximately 4.48 miles southwest of the project site and the Pat Coyle Heliport is approximately 4.87 miles southeast of the project site. Furthermore, the project does not propose the construction of any structure equal to or greater than 150 feet in height that would constitute a safety hazard to aircraft and/or operations from an airport or heliport. Therefore, the project would be consistent with the analysis in the GPU EIR because it would not increase impacts identified in the GPU EIR.

17(d) The GPU EIR concluded this impact to be significant and unavoidable. The project would not substantially alter traffic patterns, roadway design, place incompatible uses (e.g., farm equipment) on existing roadways, or create curves, slopes or walls which would impede adequate sight

distance on a road. The private driveways from Hannalei Drive and private “Street A” would meet County design standards with improved sight lines.

As previously discussed, the GPU EIR determined impacts on rural road safety to be significant and unavoidable. The project would have a less than significant impact as improvements would not result in changes to roadway design that would cause increased hazards. Therefore, the project would be consistent with the analysis in the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance other than the information identified in the GPU EIR.

17(e) The GPU EIR concluded this impact to be less than significant with mitigation. The project would not result in inadequate emergency access. The project includes two access routes and the construction of a turnaround for fire apparatus. Private “Street A” would be constructed north of Hannalei Drive and loop west through the development to a paved parking lot. Additionally, seven private alleys would be throughout the development. Private “Street A” and the private alleys would be constructed to meet County Fire Code Standard 503.2.6. Driveways/alleys would be constructed to a minimum of 16 feet in width. In addition, consistent with GPU EIR Mitigation Measure Tra-4.2, the project would implement the Building and Fire Codes to ensure emergency vehicle accessibility.

As previously discussed, the GPU EIR determined impacts on emergency access as less than significant with mitigation. The project would have a less than significant impact with the implementation of project conditions of approval for adherence to the Building and Fire Codes, consistent with GPU EIR Mitigation Measure Tra-4.2. Therefore, the project would be consistent with the analysis in the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance other than the information identified in the GPU EIR.

17(f) The GPU EIR concluded this impact to be less than significant with mitigation. The project is not within the vicinity of any planned public transit or pedestrian facilities. The south side of Hannalei Drive provides a 4-foot-wide sidewalk for pedestrians. Along the west side of South Santa Fe Avenue, adjacent to the project border, is a Class I multi-use path for pedestrians and bicyclists. A Class I multi-use path provides a completely separate path for shared use by bike riders, pedestrians, and other non-motorized users with minimal vehicle crossings. Additionally, the east side of South Santa Fe Avenue is a Class II bike lane. A Class II bike lane provides a striped lane for one-way bike travel on a street or highway. The project does not include any improvements which would inhibit the future performance of these pedestrian and bike facilities. Therefore, the project would not conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities.

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

Conclusion

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

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

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

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

4. Feasible mitigation measures contained in the GPU EIR (Tra-4.2) would be applied to the project. The project-specific mitigation measures, as detailed above, would require the project applicant to comply with the County Public Road Standards and 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. Sewer service would be provided by Buena Sanitation District from an existing sewer line on Hannalei Drive. A service availability letter from Buena Sanitation District dated January 2023 (Appendix P) indicated that it

has sufficient capacity to serve the project. Therefore, the project would be consistent with the wastewater treatment requirements of the RWQCB.

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

18(b) The GPU EIR concluded this impact to be less than significant with mitigation. The project requires water service from the VID. According to the water service availability form dated May 2023 (Appendix O), adequate water resources and entitlements are available to serve the project. In addition, the project would be served by the Buena Sanitation District from an existing sewer line on Hannalei Drive. A service availability letter from Buena Sanitation District dated January 2023 (Appendix P) indicated that it has sufficient capacity to serve the project. Therefore, the project would not require the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.

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

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

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

18(d) The GPU EIR concluded this impact to be significant and unavoidable. The project would receive water from the VID, which has adequate water to serve the project according to the water service availability form dated May 2023 (Appendix O). As the project would have a less than significant impact, the project would be consistent with the analysis provided in the GPU EIR because it would not increase impacts identified in the GPU EIR.

18(e) The GPU EIR concluded this impact to be less than significant with mitigation. The project would be served by Buena Sanitation District, which has sufficient capacity to serve the project according to a service availability letter dated January 2023 (Appendix P). 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 to be less than significant with mitigation. As the project would have a less than significant impact for the reasons detailed above, the project would be consistent with the analysis in the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance other than the information identified in the GPU EIR.

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

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

Conclusion

With regard to the issue area of 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 in the GPU EIR would be required because project-specific impacts would be less than significant.

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

19(a) The GPU EIR concluded this impact to be significant and unavoidable. The project site is located within the Moderate FHSZ. Fire and emergency protection would be provided by the Vista Fire Protection District. The nearest fire station is the Vista Fire Department Station 4, located at 2121 Thibodo Road, Vista, California 92083, approximately 1.6 miles (driving) south of the project site. A service availability letter from the Vista Fire Protection District (Appendix Q) indicated that the station has sufficient capacity to serve the project.

According to the service availability letter from the Vista Fire Protection District (Appendix Q), the project site has an Emergency Response Travel Time of 4 minutes, which meets the General Plan Safety Element standard of 5 minutes for lands designated as Village Residential 7.3 (VR-7.3).

The project access from Hannalei Drive would meet County road standards. The service availability letter from the Vista Fire Protection District (Appendix Q) includes the following project conditions of approval related to emergency access:

- Private residential driveways and roadways that provide access to not more than two single family dwellings or dwelling lots are required to be a paved minimum unobstructed width of 16 feet and a minimum 13’6” vertical clearance.
- At the minimum of 24 feet wide there will be no parking on the private street, cul-de-sac, and the private driveway.
- The roadways shall be marked as “No Parking.”
- Roadway design features (speed bumps, speed humps, speed control dips, etc.) which may interfere with emergency apparatus responses shall not be installed or allowed to remain on fire access roadways.
- All fire access roadways must be maintained unobstructed and drivable by fire apparatus throughout the construction process. If the roadway becomes undrivable, a Stop Work Order may be issued until access is restored.

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

19(b) The GPU EIR concluded this impact to be significant and unavoidable. The project is within the Moderate FHSZ. 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. Specifically, all exterior walls would be 1-hour rated firewalls. In addition to the conditions of approval related to emergency access, the service availability letter from the Vista Fire Protection District (Appendix Q) includes the following addition conditions of approval for the project:

- Address numbers shall be at least 4 inches in height and placed upon a background of contrasting color. Additional address number signs visible from either direction of approach shall be provided at the entry to driveways when the building address cannot be read from the street.
- All residential structures and attached garages built on the subject property are required to have residential fire sprinkler systems installed.

Implementation of these fire safety standards would occur during the Building Permit process and is consistent with GPU EIR Mitigation Measure Haz-4.3. In addition, the project is consistent with the Zoning Ordinance and the density established under the County General Plan. Therefore, for the reasons stated above, the project would not be expected to experience exacerbated wildfire risks due to slope, prevailing winds, or other factors.

As previously stated, wildfire was analyzed in GPU EIR Section 2.7, Hazards and Hazardous Materials, and was determined to be significant and unavoidable. The project would have a less than significant impact with the implementation of GPU EIR Mitigation Measure Haz-4.3 for compliance with the Building and Fire Codes. Therefore, the project would be consistent with the analysis in the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance other than the information identified in the GPU EIR.

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

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

19(d) The GPU EIR concluded this impact to be significant and unavoidable. As previously stated in Section 19(b), the project would comply with regulations relating to emergency access, water supply, and defensible space specified in the County Fire Code and Consolidated Fire Code. The site is not located within a Landslide Susceptibility Area as identified in the County Guidelines for Determining Significance for Geologic Hazards and is identified as Generally Susceptible to potential landslides. Therefore, potential hazards associated with landslides are less than significant. Additionally, compliance with the County's Grading Ordinance and Building Code and implementation of standard engineering techniques would ensure structural safety. Therefore, for the reasons stated above, the project site would not expose people or structures to significant risk, including downslopes or downstream flooding or landslides, as a result of runoff, post-fire instability, or drainage changes.

The GPU EIR concluded significant and unavoidable impacts associated with wildfire under Section 2.7, Hazards and Hazardous Materials. However, the proposed project would have a less than significant impact for the reasons detailed above. Therefore, the project would be consistent with the analysis in the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance other than the information identified in the GPU EIR.

Conclusion

With regard 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 in the GPU EIR (Haz-4.3) and project conditions of approval by the Vista Fire Protection District would be applied to the project. These mitigation measures, as detailed above, requires the project applicant to implement brush management and comply with the Building and Fire Codes.

Appendices

Appendix A – References

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

Appendix C – Air Quality Impact Analysis Technical Memorandum

Appendix D – Biological Resources Letter Report

Appendix E – Cultural Resources Survey Report

Appendix F – Geotechnical Investigation

Appendix G – GHG Emissions Analysis Technical Memorandum

Appendix H – BAAQMD Justification Report: CEQA Thresholds for Evaluating the Significance of Climate Impacts from Land Use Projects and Plan

Appendix I – Phase I Environmental Site Assessment

Appendix J – Phase II Environmental Site Assessment

Appendix K – Pre-Demolition Asbestos and Lead-Based Paint Survey Report

Appendix L – Drainage Study

Appendix M – Stormwater Quality Management Plan for Priority Development Projects

Appendix N – Noise Impact Analysis Technical Memorandum

Appendix O – Vista Irrigation District Service Availability Letter

Appendix P – Buena Sanitation District Service Availability Letter

Appendix Q – Vista Fire Protection District Service Availability Letter

Appendix R – Vista Unified School District Service Availability Letter

Appendix S – VMT Screening

Appendix T – Local Transportation Assessment

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:

References

For a complete list of technical studies, references, and significance guidelines used to support the analysis of the General Plan Update Final Certified Program EIR, dated August 3, 2011, please visit the County's website at: https://www.sandiegocounty.gov/content/dam/sdc/pds/gpupdate/docs/BOS_Aug2011/EIR/FEIR_5.00_-_References_2011.pdf.

BAAQMD. Justification Report: CEQA Thresholds for Evaluating the Significance of Climate Impacts from Land Use Projects and Plan (April 2022).

Buena Sanitation District. Sewer Service Availability Letter (2023).

CAPCOA. California Emissions Estimator Model 2020.4.0 (2021).

City of Vista. Vista General Plan 2030 (2012).

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

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

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

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

CR Associates. Local Transportation Assessment (April 2023).

CR Associates. VMT Screening (April 11, 2023).

Harris & Associates. Air Quality Impact Analysis Technical Memorandum (June 7, 2024).

Harris & Associates. Biological Resources Letter Report (March 31, 2023).

Harris & Associates. Cultural Resources Survey Report (March 2023).

Harris & Associates. GHG Emissions Analysis Technical Memorandum (June 7, 2024).

Harris & Associates. Noise Impact Analysis Technical Memorandum (August 14, 2023).

Leighton and Associates, Inc. Geotechnical Investigation (June 11, 2021).

Rick Engineering Company. Drainage Study (February 27, 2024).

Rick Engineering Company. SWQMP For Priority Development Projects (PDPs) (February 27, 2024).

Stantec. Phase I ESA (February 26, 2021).

Stantec. Phase II ESA (May 13, 2021).

Stantec. Pre-Demolition Asbestos and Lead-Based Paint Survey Report (May 17, 2021).

URS. (2004). Multi-Jurisdictional Hazard Mitigation Plan. https://www.sandiegocounty.gov/oes/emergency_management/oes_jl_mitplan.html.

Vista Fire Protection District. Fire Service Availability Form (2023).

Vista Irrigation District. Water Service Availability Form (2023).

Vista Unified School District. School Service Availability Form (2023).

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.

Appendix C

Air Quality Impact Analysis Technical Memorandum. March 2023.

Appendix D

Biological Resources Letter Report. March 2023.

Appendix E

Cultural Resources Survey Report. March 2023.

Appendix F

Geotechnical Investigation. June 2021.

Appendix G

GHG Emissions Analysis Technical Memorandum. March 2023.

Appendix H

Bay Area Air Quality Management District. Justification Report: CEQA Thresholds for Evaluating the Significance of Climate Impacts From Land Use Projects and Plans. April 2022.

Appendix I

Phase I Environmental Site Assessment. February 2021.

Appendix J

Phase II Environmental Site Assessment. May 2021.

Appendix K

Pre-Demolition Asbestos and Lead-Based Paint Survey Report. May 2021.

Appendix L

Drainage Study. February 2024.

Appendix M

Stormwater Quality Management Plan for Priority Development Projects. February 2024.

Appendix N

Noise Impact Analysis Technical Memorandum. August 2023.

Appendix O

Vista Irrigation District Service Availability Letter. May 2023.

Appendix P

Buena Sanitation District Service Availability Letter. January 2023.

Appendix Q

Vista Fire Protection District Service Availability Letter. March 2023.

Appendix R

Vista Unified School District Service Availability Letter. March 2023.

Appendix S

VMT Screening. April 2023.

Appendix T

Local Transportation Assessment. April 2023.