



County of San Diego

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DAHVIA LYNCH
DIRECTOR

November 9, 2023

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

Project Name: Lehman Tentative Parcel Map
Project Record Numbers: PDS2020-TPM-21278
Environmental Log Number: PDS2020-ER-20-02-002

APN(s): 123-261-14-00

Lead Agency Name and Address:
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Planning and Development Services
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Project Location:
The proposed Lehman Tentative Parcel Map (Project) is located within the unincorporated community of Fallbrook in northern San Diego County. The approximately 10.28-acre project site is located at 3600 Linda Vista Drive, located within the Fallbrook Community Plan area.

Project Applicant Name and Address:

General Plan
Community Plan: Lakeside
Regional Categories: Semi-Rural
Land Use Designations: Semi-Rural Residential (SR-2)
Density: SR-2
Floor Area Ratio (FAR): N/A

Zoning

Use Regulation: Limited Agricultural (A70)
Minimum Lot Size: 2 acres
Special Area Regulation: C

Description of Project:

The proposed project is a Tentative Parcel Map to subdivide 10.28 acres into four single-family residential lots (Project). The project site is located on Linda Vista Drive in the Fallbrook Community Planning area, within unincorporated San Diego County. The site is developed with an existing single-family dwelling with an attached garage that would remain. Access to the resulting parcels would be provided by Linda Vista Drive. The Project would be served by on-site septic systems and imported water from the Rainbow Municipal Water District. No extension of sewer and water utilities will be required by the Project. Earthwork will consist of a cut and fill of 8,000 cubic yards of material. The site is subject to the General Plan Semi-Rural Regional Category, Semi-Rural 1 (SR-1) Land Use Designation. The zoning for the site is Limited Agriculture (A70).

Discretionary Actions:

The Project includes a discretionary permit for a Tentative Parcel Map and Property Condition Agreement.

Overview of 15183 Checklist

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

General Plan Update Program EIR

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

enhance the character of communities within the unincorporated County. The SDCWA service area covers approximately the western one third of the unincorporated County. The SDWCA boundary generally represents where water and wastewater infrastructure currently exist. This area is more developed than the eastern areas of the unincorporated County, and would accommodate more growth under the GPU.

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

Summary of Findings

The Project is consistent with the analysis performed for the GPU EIR. Further, the GPU EIR adequately anticipated and described the impacts of the Project, identified applicable mitigation measures necessary to reduce Project specific impacts, and the Project implements these mitigation measures (see [http://www.sdcounty.ca.gov/PDS/gpupdate/docs/BOS_Aug2011/EIR/FEIR_7.00 -
Mitigation Measures 2011.pdf](http://www.sdcounty.ca.gov/PDS/gpupdate/docs/BOS_Aug2011/EIR/FEIR_7.00_-_Mitigation_Measures_2011.pdf) for complete list of GPU Mitigation Measures.

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

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

- 1. The Project is consistent with the development density established by existing zoning, community plan or general plan policies for which an EIR was certified.**
The Project would subdivide a 10.28-acre property into 4 lots, 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 which are peculiar to the Project or its site. The project site is located in an area developed with similarly sized, estate residential lots with associated accessory uses. The property does not support any peculiar environmental features, and the Project would not result in any peculiar effects.

In addition, as explained further in the 15183 Checklist below, all Project impacts were adequately analyzed by the GPU EIR. The Project could result in potentially significant impacts to Biological Resources, Cultural Resources, Greenhouse Gas Emissions, Hydrology and Water Quality, Noise, Transportation and Traffic, and Wildfire. However, applicable mitigation measures specified within the GPU EIR have been made conditions of approval for this Project.

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

The Project is consistent with the density and use characteristics of the development considered by the GPU EIR and would represent a small part of the growth that was forecast for build-out 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 which would result in a determination of a more severe impact than what had been anticipated by the GPU EIR.

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

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

_____ Signature	November 9, 2023 Date
Souphie Sakdarak Printed Name	Project Manager Title

CEQA Guidelines §15183 Exemption Checklist

Overview

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

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

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

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

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

Discussion

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

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

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

The project site is located north of the intersection of Linda Vista Road and Linda Vista Terrace, within the Fallbrook Community Plan Area in the unincorporated County of San Diego. The Rancho Monserate Creek is the closest RCA identified by the County of San Diego General Plan or Fallbrook Community Plan. The project site is located approximately 3,100 feet to the west Rancho Monserate Creek and is not visible from this RCA due to the surrounding topography.

The project site is located in the vicinity of several public trails, including the Linda Vista Trail. The 15.5-acre project site would be divided into 4 lots, which will remain as residential uses. As the Project is consistent with the existing residential land uses

surrounding the project site, it would not detract from existing views from an adopted County or State Trail system.

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

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

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

The project site is currently developed with an existing single-family home and an attached garage. The majority of the properties surrounding the project site are developed with rural residential and agricultural uses. The visual character surrounding the project site is characterized by rural single-family residences, and a limited number of orchards and horticultural agriculture operations.

The Project would not detract from, or contrast with the existing visual character and/or quality of the surrounding areas. The Project proposes four single-family residences, which is consistent with the General Plan density and the planned uses within the Fallbrook Community Plan for the project site and the surrounding area. The resulting uses within the project site will 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 within the GPU EIR because it would not create new

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

- 1(d) The GPU EIR concluded this impact to be significant and unavoidable. The Project would create three new residential lots by dividing a 10.28-acre property into 4 lots. The future uses in the project area would likely use outdoor lighting, but the project area is not located within Zone A of the County of San Diego Light Pollution Code (within twenty miles of the Mount Laguna Observatory or the Palomar Observatory). The Project would not adversely affect nighttime views or astronomical observations because the Project would be required to conform to the Light Pollution Code (Section 51.201-51.209) 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 within the GPU EIR because it would not create new impacts, increase impacts, and there is no new information of substantial importance than identified within the GPU EIR.

Conclusion

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

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

Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
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2. Agriculture/Forestry Resources

– Would the Project:

- | | | | |
|--|--------------------------|--------------------------|--------------------------|
| a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide or Local Importance as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, or other agricultural resources, to a non-agricultural use? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b) Conflict with existing zoning for agricultural use, or a Williamson Act contract? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| c) Conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland zoned Timberland Production? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| d) Result in the loss of forest land, conversion of forest land to non-forest use, or involve other changes in the existing environment, which, due to their location or nature, could result in conversion of forest land to non-forest use? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| e) Involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Important Farmland or other agricultural resources, to non-agricultural use? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Discussion

2(a) The GPU EIR concluded this impact to be significant and unavoidable. Based on the County of San Diego Geographical Information System (GIS), a portion of the site has been designated as “Farmland of Local Importance” by the Department of Conservation, Farmland Mapping and Monitoring Program (FMMP) and therefore has the potential to be classified as an important agricultural resource.

In determining whether impacts to agricultural resources are significant environmental effects, the CEQA Guidelines references the California Agricultural LESA Model (1997) prepared by the California Department of Conservation (DOC), as an optional methodology that may be used to assess the relative value of agriculture and farmland. In the past, the LESA model has been applied to various agricultural properties throughout the County of San Diego to assess agricultural importance in association with proposed discretionary land use permits. After several years of practical experience with the application of the LESA model in San Diego County, the inadequacy of the model in capturing the unique and varied character of San Diego agriculture has become apparent. An alternative approach, referred to as the Local Agricultural Resource Assessment (LARA) model has been developed to assess the relative value of agricultural resources in San Diego County. The LARA model may be used to determine whether a site is an agricultural resource, pursuant to the County’s Guidelines for Determining Significance and Report Format and Content Requirements for Agricultural Resources.

A Local Agricultural Resource Assessment (LARA) Model was prepared for the Project dated September 23, 2022 which analyzed agricultural resources on the project site. The LARA model takes into account several factors when determining whether agricultural resources could be located on a property. These factors include several required factors, including water, climate, and soil quality, and several complementary factors, including surrounding land uses, land use consistency, and topography. To be considered an important agricultural resource under the LARA model, none of the required factors may be rated as low importance. Within the LARA model prepared for the Project, the project site received a low rating for soil quality. As one of the required factors within the LARA model received a low rating, the site is not an important agricultural resource. Therefore, there are no agricultural resources on the site that will 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 direct and indirect impact for the reasons detailed above. Therefore, the Project would be consistent with the analysis within the GPU EIR because it would not create new impacts, increase impacts, and there is no new information of substantial importance than identified within the GPU EIR.

- 2(b) The GPU EIR concluded this impact to be less than significant with mitigation. The project site is zoned A70, limited agricultural, however, as mentioned above in response 2(a), the project site would not be considered a viable agricultural resource due to the low soil quality on site. The nearest lands under Williamson Act Contract or in an agricultural preserve are located approximately 0.95-miles northeast 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 within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 2(c) Forestry Resources were not specifically analyzed under the GPU EIR because Appendix G of the State CEQA Guidelines was amended to include significance criteria for forestry resources after the release of the Notice of Preparation for the GPU EIR. The project site including any offsite improvements do not contain any forest lands as defined in Public Resources Code section 12220(g), therefore Project implementation would not result in the loss or conversion of forest land to a non-forest use. The outer edge of the Cleveland National Forest is located approximately 11.6 miles to the east of the project site. Thus, due to distance, the Project would have no impact on the Forest. In addition, the County of San Diego does not have any existing Timberland Production Zones. 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 State 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 within the GPU EIR because it would not create new impacts, increase impacts, and there is no new information of substantial importance than identified within the GPU EIR.

- 2(d) Forestry Resources were not specifically analyzed under the GPU EIR because Appendix G of the State CEQA Guidelines was amended to include significance criteria for forestry resources after the release of the NOP for the GPU EIR. As indicated in response 2(c), the project site, or any off-site improvements, are not located near any forest lands. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.
- 2(e) The GPU EIR concluded this impact to be significant and unavoidable. As mentioned above in response 2(a), the project site would not be considered an agricultural resource. Therefore, the Project would not result in any conversion of onsite agricultural resources to a non-agricultural use.

Based on a review of the County of San Diego GIS and aerial imagery, it was found that the Project is within one-quarter 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 offsite impact. The project site is separated by more than 300 feet from this agricultural operation. Furthermore, the applicant proposes a residential subdivision that is consistent with the existing densities in the surrounding area and will 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 within the GPU EIR because it would not create new impacts, increase impacts, and there is no new information of substantial importance than identified within the GPU EIR.

Conclusion

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

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

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
3. Air Quality – Would the Project:			
a) Conflict with or obstruct implementation of the San Diego Regional Air Quality Strategy (RAQS) or applicable portions of the State Implementation Plan (SIP)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion

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

The Project would include construction activities for and operation of up to 3 single-family homes. The Project would also consist of the operation the existing residence to remain. 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 is limited to a balanced cut and fill of 8,000 cubic yards. 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 within the GPU EIR because it would not create new impacts, increase impacts, and there is no new information of substantial importance than identified within the GPU EIR.

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

A project would have a significant direct impact related to criteria pollutants if it would exceed any of the County’s Screening Level Thresholds (SLTs) presented in Table 1 below. The County’s SLTs are based on SDAPCD Rules 20.1, 20.2, and 20.3 and were adopted from the SDAPCD Air Quality Impact Analysis trigger level thresholds to align with attainment of the NAAQS and be protective of public health. Therefore, air quality emissions below the SLTs would meet the NAAQS. The NAAQS were developed to protect public health, specifically the health of “sensitive” populations, including asthmatics, children, and the elderly.

Table 1 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.
^aBased 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.
^bThreshold for VOCs based on the threshold of significance for VOCs from the South Coast Air Quality Management District for the Coachella Valley.
^c13.7 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 (California Air Pollution Control Officers Association [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 (PM₁₀), fine particulate matter (PM_{2.5}), and ROG. Inputs to CalEEMod include such items as the air basin containing the project, land uses, trip generation rates, trip lengths, duration of construction phases, construction equipment usage, grading areas, as well as other parameters.

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

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; and
- 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 track-out/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 ROG 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 begin in June 2024 and last approximately six 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 was modeled. Table 2 summarizes the modeled construction parameters.

Table 2 Construction Parameters				
Construction Phase	Phase Duration (Days)	Equipment	Amount	Hours per Day
Site Preparation	2	Rubber Tired Dozers	3	8
		Tractors/Loaders/Backhoes	4	8
Grading	5	Excavators	2	8
		Graders	1	8
		Rubber Tired Dozers	1	8
		Scrapers	2	8
		Tractors/Loaders/Backhoes	2	8
Building Construction	48	Cranes	1	7
		Forklifts	3	8
		Generator Sets	1	8
		Tractors/Loaders/Backhoes	3	7
		Welders	1	8
Architectural Coatings	3	Air Compressor	1	6
Paving	3	Pavers	2	8
		Paving Equipment	2	8
		Rollers	2	8
SOURCE: CalEEMod Output, Attachment 1 in Appendix B.				

Construction activities would be subject to several control measures per the requirements of the County, SDAPCD rules, and California Air Resources Board (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 Section 87.428, the applicant shall implement one or more of the following 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 track-out from paved surfaces daily or more frequently as necessary.
 - Minimize the track-out 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 Chapter 10 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 3 presents the total projected construction maximum daily emission levels for each criteria pollutant. Note that the emissions summarized in Table 3 are the maximum emissions for each pollutant that would occur during each phase based on all modeled construction equipment (see Table 2) 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 6, 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 six months. No mass grading would be required, and construction equipment would be minimal. Given the rural nature of the project vicinity, it is unlikely that other major construction activities would occur in the same area at the same time. There are no proposed projects or reasonably foreseeable future projects within proximity of the project that are anticipated to include construction concurrent with the project. As described above, the County’s SLT 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. 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.

Table 3 Summary of Maximum Construction Emissions (pounds per day)						
	Pollutant					
	ROG	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Site Preparation	3	28	18	<1	27	12
Grading	3	35	28	<1	26	7
Building Construction/Architectural Coatings	2	14	16	<1	1	1
Paving	1	10	15	<1	1	<1
Maximum Daily Emissions	3	35	28	<1	27	12
<i>County Screening Level Thresholds</i>	75	250	550	250	100	55

Operational Emissions

The Project would include construction activities for and operation of up to 3 single-family homes. The Project would also consist of the operation the existing residence to remain. Table 4 presents daily operational emissions associated with these four residences. As shown in Table 4, the project’s daily operational emissions would not exceed the SLTs for any criteria pollutant. 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.

Table 4 Summary of Project Operational Emissions (pounds per day)						
	Pollutant					
	ROG	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Area Sources	6	<1	8	<1	1	1
Energy Sources	<1	1	<1	<1	<1	<1
Mobile Sources	<1	<1	<1	<1	<1	<1
Total	6	1	8	<1	1	1
<i>County Screening Level Thresholds</i>	75	250	550	250	100	55

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

3(c) Expose sensitive receptors to substantial pollutant concentrations?

The GPU EIR concluded this impact to be significant and unavoidable. Air quality regulators typically define sensitive receptors as schools (Preschool – 12th Grade), hospitals, resident care facilities, day-care centers, residences, or other facilities that may house individuals with health conditions that would be adversely impacted by changes in air quality. The Project includes the subdivision of 10.28 acres into four lots. The Project would not be considered a point-source of significant emissions. The Project would generate construction emissions in the vicinity of sensitive receptors.

Diesel particulate matter (DPM) is the primary toxic air contaminant (TAC) of concern and is generated from fuel consumption in heavy construction equipment. Projects that would result in exposure to toxic air contaminants (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 one million for projects implementing best available control technology for air toxics or a health hazard index greater than one, 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 six-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.

Due to the limited time of exposure, project construction is not anticipated to create conditions where the probability is greater than 10 in one 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 (EPA) 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 a quarter-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 Carbon Monoxide 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 within the GPU EIR because it would not create new impacts, increase impacts, and there is no new information of substantial importance than identified within the GPU EIR.

- 3(d) 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 µg/m³). Therefore, the Project would not create objectionable odors affecting a substantial number of people.

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

Conclusion

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

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

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

- | | | | |
|---|--------------------------|--------------------------|--------------------------|
| <p>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?</p> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| <p>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?</p> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| <p>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?</p> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| <p>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?</p> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| <p>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?</p> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Discussion

4(a) Biological resources on the project site were evaluated in a Biological Resource Letter Report prepared by Vince Scheidt, dated May 2022. The site contains extensive agriculture, coast live oak woodland, Diegan coastal sage scrub, and urban/developed habitats. Special status wildlife species observed on the site include the western blue bird (*Sialia mexicana*) and red-shouldered hawk (*Buteo lineatus*). No special status plant species were observed on the site. As a result of this Project, impacts will occur to 6.7 acres of extensive agriculture and 1.2 acres of urban/developed habitat. The Project will completely avoid the coast live oak woodland, Diegan coastal sage scrub, RPO wetland, and jurisdictional drainage identified onsite. The site is located within the County’s draft North County Multiple Species Conservation Program (MSCP) in land designated as outside the Pre-Approved Mitigation Area (PAMA).

As considered by the GPU EIR, project impacts to sensitive habitat and/or species will be mitigated through ordinance compliance and through implementation of the following mitigation measures: dedication of an open space easement and limited building zone

easement, 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.

- 4(b) Based on the Biological Resource Letter Report, wetlands and jurisdictional waters were found on the site. The following sensitive habitats were identified on the site: coastal live oak woodland and Diegan coastal sage scrub. The Project will completely avoid the coast live oak woodland, Diegan coastal sage scrub, RPO wetland, and jurisdictional drainage identified onsite. As detailed in response a) above, direct, and indirect impacts to sensitive natural communities identified in the Resource Protection Ordinance (RPO), NCCP, Fish and Wildlife Code, and Endangered Species Act are mitigated.

As considered by the GPU EIR, project impacts to sensitive habitats will be mitigated through ordinance compliance and through implementation of the following mitigation measures: dedication of an open space easement and limited building zone easement, 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.

- 4(c) The proposed project site contains wetlands defined by Section 404 of the Clean Water Act. However, the Project is designed to avoid this feature and will dedicate an open space easement over the area.
- 4(d) Based on a GIS analysis, the County's Comprehensive Matrix of Sensitive Species, and a Biological Resource Letter Report, it was determined that the site is not part of a regional linkage/corridor as identified on MSCP maps nor is it in an area considered regionally important for wildlife dispersal. The site would not assist in local wildlife movement as it lacks connecting vegetation and visual continuity with other potential habitat areas in the general project vicinity.
- 4(e) The project is located within the draft North County MSCP and outside of the South County MSCP. Therefore, it does not require conformance with the Biological Mitigation Ordinance (BMO). The project is consistent with the County's Guidelines for Determining Significance for Biology, the RPO, and the Migratory Bird Treaty Act (MBTA), with the implementation of mitigation. The Project will not conflict with the provisions of any adopted Habitat Conservation Plan, 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 within the GPU EIR will be applied to the project.

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

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

Discussion

5(a) Based on an analysis of records and a survey of the property by County approved archaeologist, Sue Wade, it has been determined that there are no impacts to historical resources because they do not occur within the project site. The results of the survey are provided in the cultural resources report titled, *Lehman Tentative Parcel Map (PDS2020-TPM-21278)* (November 12, 2020) prepared by Sue Wade.

5(b) Based on an analysis of records and a survey of the property by County approved archaeologist, Sue Wade, it has been determined that there are no impacts to archaeological resources because they do not occur within the project site. The results of the survey are provided in the cultural resources report titled *Lehman Tentative Parcel Map (PDS2020-TPM-21278)* (November 12, 2020) prepared by Sue Wade

The Native American Heritage Commission (NAHC) was contacted for a listing of Native American Tribes whose ancestral lands may be impacted by the Project. The NAHC response was received on April 7, 2020, indicating that the Sacred Lands File check was positive and to contact the Pala Band, Rincon Band, Kwaaymii Band, and San Luis Rey Band for more information. In addition to these tribes, the NAHC provided a list of tribes to contact. Eight tribes (La Jolla, Pala, Pauma & Yuima, Pechanga, Rincon, San Luis Rey, San Pasqual, and Soboba) were contacted on February 8, 2021. Only two tribes responded - San Pasqual declined consultation and Rincon requested consultation. Although the study was negative for resources, Rincon requested that an Archaeological and Tribal Monitoring Program, and Treatment Agreement and Preservation Plan be implemented due to the sensitivity of the area. The Project will be conditioned with both an Archaeological and Tribal Monitoring Program and a Treatment Agreement and Preservation Plan (CUL-1 and CUL-2, below).

As considered by the GPU EIR, potential impacts to cultural resources will be mitigated through ordinance compliance and through implementation of the following mitigation measures: 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 will be conditioned with archaeological monitoring (Cul-2.5) that includes the following requirements:

CUL-1: Archaeological and Tribal Monitoring Program

- 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 Luiseño Native American monitor to explain the monitoring requirements.

- Construction
 - Monitoring. Both the Project Archaeologist and Luiseño Native American monitor are to be onsite during earth disturbing activities. The frequency and monitoring of native soils will be determined by the Project Archaeologist in consultation with the Luiseño Native American monitor. Both the Project Archaeologist and 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 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 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. Should the isolates and non-significant deposits not be collected by the Project Archaeologist, the Luiseño Native American monitor may collect the cultural material for transfer to a Tribal curation facility or repatriation program.
 - 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 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 PDS Staff Archaeologist.
 - Upon identification of human remains, no further disturbance shall occur in the area of the find until the County Coroner has made the necessary findings as to origin. If the human remains are to be taken offsite for evaluation, they shall be accompanied by the Luiseño Native American monitor.
 - If the remains are determined to be of Native American origin, the Most Likely Descendant (MLD), as identified by the Native American Heritage Commission (NAHC), shall be contacted by the Property Owner or their representative in order to determine proper treatment and disposition of the remains.
 - The immediate vicinity where the Native American human remains are located is not to be damaged or disturbed by further development activity until consultation with the MLD regarding their recommendations as required by Public Resources Code Section 5097.98 has been conducted.
 - Public Resources Code §5097.98, CEQA §15064.5 and Health & Safety Code §7050.5 shall be followed in the event that human remains are discovered.
 - Rough Grading

- Monitoring Report. Upon completion of Rough Grading, a monitoring report shall be prepared 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 prehistoric materials have been curated at a San Diego curation facility or Tribal curation facility that meets federal standards per 36 CFR Part 79, or alternatively have been repatriated to a culturally affiliated tribe.
 - The final report shall include evidence that all historic materials have been curated at a San Diego curation facility that meets federal standards per 36 CFR Part 79.

CUL-2: Cultural Resources Treatment Agreement and Preservation Plan

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, 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. 8,000 cubic yards of soil are to be excavated, and 8,000 cubic yards of soil are to be used for fill. No soils are proposed for export offsite. 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) 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 will 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) 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 within the GPU EIR will be applied to the project.

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

- | | | | |
|---|--------------------------|--------------------------|--------------------------|
| a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Discussion

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

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

- 6(a) The Project would increase the demand for electricity and natural gas at the project site, and gasoline consumption in the project area during construction and operation relative to existing conditions. CEQA requires mitigation measures to reduce “wasteful, inefficient and unnecessary” energy usages (Public Resources Code Section 21100, subdivision [b][3]). Neither the law nor the State CEQA Guidelines establish criteria that define wasteful, inefficient, or unnecessary use. Compliance with the California Code of Regulations 2019 Title 24 Part 6 Building Code would result in highly energy-efficient buildings. However, compliance with building codes does not adequately address all potential energy impacts during construction and operation. It can be expected that energy consumption, outside of the building code regulations, would occur through the transport of construction materials to and from the site during the construction phase, 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% 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 and requires solar photovoltaic systems for new single-family homes.
- Each proposed unit will be constructed as Electrical Vehicle (EV) Ready pursuant to CalGreen Tier 2, including the installation of necessary electrical components to support future charging station;
- Each proposed unit will be constructed as an all-electric structure, with no natural gas appliances or natural gas plumbing.

Grading and Construction

The grading required for the Project would be 8,000 cubic yards of balanced cut and fill. During the grading and construction phases of the Project, the primary energy source utilized would be petroleum from construction equipment and vehicle trips. To a lesser extent, electricity would also be consumed for the temporary electric power for as-necessary lighting and electronic equipment. Activities including electricity would be temporary and negligible; therefore, electricity use during grading and construction would not result in wasteful, inefficient, or unnecessary consumption of energy. 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 needs for the Project construction would be temporary and is not anticipated to require additional capacity or increase peak or base period demands for electricity or

other forms of energy. Construction equipment use and associated energy consumptions would be typical of that associated with the construction of residential projects of this size in a semi-rural setting. Additionally, the Project is consistent with the General Plan and Zoning Ordinance. 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 current Title 24 Standards require solar photovoltaic systems for new single-family homes. Furthermore, the projects will 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 onsite.

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, CAFÉ Standards) are designed to reduce wasteful, unnecessary, and inefficient use of fuel. The coupling of various State policies and regulations such as the Zero-Emission Vehicles Mandate and Senate Bill 350 would result in the deployment of electric vehicles which would be powered by an increasingly renewable electrical grid. The Project would require future residences to be constructed as EV Ready per CALGreen Tier 2, increasing the ability of future residents to use electric vehicles. 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 General Plan 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% 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 and requires solar photovoltaic systems for new single-family homes.
- Each proposed unit will be constructed as Electrical Vehicle (EV) Ready pursuant to CalGreen Tier 2, including the installation of necessary electrical components to support future charging station;
- Each proposed unit will 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 regards to the issue area of Energy, the following findings can be made:

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

7. Geology and Soils – Would the Project:

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving: (i) rupture of a known earthquake fault, (ii) strong seismic ground shaking or seismic-related ground failure, (iii) liquefaction, and/or (iv) landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

potentially result in an on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?

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

Discussion

7(a)(i) The GPU EIR concluded this impact to be less than significant. The Project is not located in a fault rupture hazard zone identified by the Alquist-Priolo Earthquake Fault Zoning Act, Special Publication 42, Revised 1997, Fault-Rupture Hazards Zones in California, or located on any known active, potentially active, or inactive fault traces. The project site is approximately 11.3 miles from the nearest Alquist-Priolo Zone, and 3.8 miles from the nearest Pre-Quaternary fault zone.

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 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. Additionally, the Project will 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 as identified in the County Guidelines for Determining Significance for Geologic Hazards. Landslide Susceptibility Areas were developed based on landslide risk profiles included in the Multi-Jurisdictional Hazard Mitigation Plan, San Diego, CA (URS, 2004). Landslide risk areas from this plan were based on data including steep slopes (greater than 25%); soil series data (SANDAG based on USGS 1970s series); soil-slip susceptibility from USGS; and Landslide Hazard Zone Maps (limited to western portion of the County) developed by the California Department of Conservation Division of Mines and Geology (DMG). Also included within Landslide Susceptibility Areas

are gabbroic soils on slopes steeper than 15% 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 within the GPU EIR because it would not create new impacts, increase impacts, and there is no new information of substantial importance than identified within the GPU EIR.

- 7(b) The GPU EIR concluded this impact to be less than significant. According to the Soil Survey of San Diego County, the soils on-site are identified as Fallbrook sandy loam, 15 to 30 percent slopes, eroded (FaE2), Placentia sandy loam, 5 to 9 percent, eroded (PeC2), and steep gullied land (StG), which all have a soil erodibility rating of Severe. However, the Project would not result in substantial soil erosion or the loss of topsoil because the Project would be required to comply with the Watershed Protection Ordinance (WPO) and Grading Ordinance. 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 Best Management Practices (BMPs) per the Standard Development Project Storm Water Quality Management Plan to prevent fugitive sediment. Please see Section (10) Hydrology and Water Quality for a detailed discussion.

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

- 7(c) The GPU EIR concluded this impact to be less than significant. 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.

In order 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 within the GPU EIR because it would not create new impacts, increase impacts, and there is no new information of substantial importance than identified within the GPU EIR.

7(d) The GPU EIR determined impacts from expansive soils to be less than significant. The 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 within the GPU EIR because it would not create new impacts, increase impacts, and there is no new information of substantial importance than identified within the GPU EIR.

7(e) The GPU EIR concluded this impact to be less than significant. The Project would rely on conventional leach lines or supplement treatment systems, which would require approval by the County Department of Environmental Health and Quality (DEHQ) prior to the issuance of building permits for residential structures. As such, the Project would not place septic tanks or alternative wastewater disposal systems on soils incapable of adequately supporting the tanks or system.

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

Conclusion

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

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

8. Greenhouse Gas Emissions – Would the Project:

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

Analysis

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

State CEQA Guidelines Section 15064.4 states that “the determination of the significance of greenhouse gas emissions (GHG) 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.

State 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 of San Diego (County) General Plan incorporates smart growth and land planning principles intended to reduce vehicle miles traveled, 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 32 (AB 32) and Senate Bill 375 (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 towards the 2050 GHG reduction goal.

On September 30, 2020, the Board voted to set aside its approval of the County’s 2018 CAP and related actions because the Final Supplemental Environmental Impact Report (2018 CAP SEIR) was found to be out of compliance with CEQA. In response to this Board 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 does not currently have locally adopted screening criteria or GHG thresholds. Pending adoption of a new CAP, appropriate GHG emissions thresholds were considered for purposes of this analysis for this Project. State CEQA Guidelines Section 15064.7(d) states that a lead agency may consider thresholds of significance previously adopted or

recommended by other public agencies, provided the decision of the lead agency to use such threshold is supported by substantial evidence. Based on the specific characteristics of the Project, the current CEQA threshold 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. BAAQMD's Justification Report: CEQA Thresholds for Evaluating the Significance of Climate Impacts from Land Use Projects and Plan (Justification Report), adopted April 2022, is provided in Appendix C. The information provided in the Justification Report is intended to provide the substantial evidence that lead agencies need to support their determinations about significance using these thresholds.

The 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 State 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 Senate Bill 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 electric vehicle requirements in the most recently adopted version of CALGreen Tier 2.

Building Energy Use

Energy use emissions are generated by activities within buildings that utilize 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 three new residences and one existing residence. 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 VI. 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 Electrical Vehicles (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 in order 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 electric vehicle 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.

Senate Bill 743 (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, 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 (Board) 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 four single-family residential lots. The anticipated traffic to be generated by the project was determined using the San Diego Association of Governments (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 48 Average Daily Trips. The TSG finds that small residential projects which generate less than 110 Average Daily Trips would have a less than significant VMT impact. Therefore, the Project would be consistent with a locally adopted Senate Bill 743 VMT target which reflects the recommendations provided in the Governor’s Office of Planning and Research’s 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 SDG&E in the project area.

By meeting a locally adopted SB 743 target, and complying with the off-street electric vehicle 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 towards 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 Vehicle Miles Traveled (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 within the GPU EIR because it would not create new impacts, increase impacts, and there is no new information of substantial importance than identified within the GPU EIR.

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 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, 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) above, the project would provide its "fair share" contribution towards 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 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 emission 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, 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 towards 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) above, 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)/Sustainable Communities Strategy (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, would implement 2022 CALGreen Tier 2 voluntary requirements for EV parking, and would install rooftop solar panels for clean energy generation, supporting the goal of achieving healthy air and reduced GHG emissions regionwide.

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 of San Diego 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 greenhouse gas 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 within the GPU EIR because it would not create new impacts, increase impacts, and there is no new information of substantial importance than identified within the GPU EIR.

Conclusion

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

1. No peculiar impacts to the Project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.

- 3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
- 4. Feasible mitigation measures contained within the GPU EIR will be applied to the project.

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

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

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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b) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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c) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, or is otherwise known to have been subject to a release of hazardous substances and, as a result, would it create a significant hazard to the public or the environment?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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d) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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e) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

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

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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h) Propose a use, or place residents adjacent to an existing or reasonably foreseeable use that would substantially

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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increase current or future resident's exposure to vectors, including mosquitoes, rats or flies, which are capable of transmitting significant public health diseases or nuisances?

Discussion

- 9(a) The GPU EIR concluded this impact to be less than significant. The Project would not create a significant hazard to the public or the environment because it does not propose the storage, use, transport, emission, or disposal of Hazardous Substances, nor are Hazardous Substances proposed or currently in use in the immediate vicinity. In addition, the Project does not propose to demolish any existing structures onsite and therefore would not create a hazard related to the release of asbestos, lead-based paint or other hazardous materials from demolition activities.

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

- 9(b) The GPU EIR concluded this impact to be less than significant. The Project is not located within one-quarter mile of an existing or proposed school. The closest school, Family Education Academy, is 0.75 miles west of the project site. The Project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of the schools. 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 within the GPU EIR because it would not create new impacts, increase impacts, and there is no new information of substantial importance than identified within the GPU EIR.

- 9(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 within the GPU EIR because it would not create new impacts, increase impacts, and there is no new information of substantial importance than identified within the GPU EIR.

- 9(d) The GPU EIR concluded this impact to be less than significant with mitigation. The Project is located within the Airport Land Use Compatibility Plan (ALUCP) for MCAS Camp Pendleton. The MCAS Camp Pendleton ALUCP finds that projects which are consistent with a local agency's general plan are considered consistent with the ALUCP. The applicant proposes a subdivision that is consistent with all relevant policies and regulations within the County's General Plan. Furthermore, the Project is within Review Area 2 of the ALUCP, which only requires further land use consistency review in specific circumstances, such as projects which propose a structure with a significant height or create a significant visual hazard to aircraft in flight. The Project does not meet any of these criteria requiring additional review. Therefore, the Project does not require any additional analysis and would be considered consistent with the ALUCP.

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

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

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

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

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

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

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

9(g) The GPU EIR concluded this impact as significant and unavoidable. The Project is within the Moderate Fire Hazard Severity Zone (FHSZ) and within the Urban-Wildland Interface Zone. 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 mitigation measure Haz-4.3. In addition, the Project is consistent with the Zoning Ordinance and the density established under the County of San Diego General Plan. Therefore, for the reasons stated above, the Project would not 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 within the GPU EIR because it would not create new impacts, increase impacts, and there is no new information of substantial importance than identified within the GPU EIR.

9(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 will 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 will 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 within the GPU EIR because it would not create new impacts, increase impacts, and there is no new information of substantial importance than identified within the GPU EIR.

Conclusion

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

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

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
10. Hydrology and Water Quality – Would the Project:			
a) Violate any waste discharge requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Is the project tributary to an already impaired water body, as listed on the Clean Water Act Section 303(d) list? If so, could the project result in an increase in any pollutant for which the water body is already impaired?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Could the proposed project cause or contribute to an exceedance of applicable surface or groundwater receiving water quality objectives or degradation of beneficial uses?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- g) Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems?
- 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:

CEQA Level Drainage Study for Lehman TPM prepared by dk Green Consulting, Inc, dated May 31, 2022.

Stormwater Quality Management Plan (SWQMP) For Priority Development Projects (PDPs) prepared by dk Green Consulting, Inc., dated May 28, 2022.

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 Storm Water Pollution Prevention Plan (SWPPP). The SWPPP would implement the following typical erosion control BMPs: hydraulic stabilization hydroseeding and Bonded Fiber Matrix or Stabilized Fiber Matrix on disturbed slopes; County Standard lot perimeter protection detail and mulch, straw, woodchips and soil application for erosion control on disturbed flat areas; energy dissipater outlet protection for water velocity control; silt fencing, and gravel and sand bags for sediment control; stabilized construction entrance, for the prevention of offsite tracking of sediment; and measures to control materials management and waste management. The SWPPP would be prepared in accordance with Order No. 2009-009-DWQ, National Pollutant Discharge Elimination System (NPDES) Order CAS000002 Construction General Permit (CGP) adopted by the State Water Resources Control Board (SWRCB) on September 2, 2009.

During the post-construction phase, as outlined in the PDP SWQMP, the Project would implement site design, source control and structural BMPs to prevent potential pollutants

from entering storm water runoff. The PDP SWQMP has been prepared in accordance with the County of San Diego BMP Design Manual (2019) and SDRWQCB Order No. R9-2013-0001 Municipal Separate Storm Sewer System (MS4) permit (2013), as adopted by the RWQCB on May 8, 2013.

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

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

- 10(b) The GPU EIR concluded this impact to be significant and unavoidable. The site is located within Bonsall Hydrologic Sub-Area (HSA 903.12), which is part of the Lower San Luis Rey Hydrologic Area (HA 903.1). Under Section 303(d) of the Clean Water Act, the Lower San Luis Rey Watershed was identified as impaired for a number of pollutants, including chloride and total dissolved solids. 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 with mitigation (Hyd-1.2 through Hyd-1.5) to water quality standards and requirements. Therefore, the Project would be consistent with the analysis within the GPU EIR because it would not create new impacts, increase impacts, and there is no new information of substantial importance than identified within the GPU EIR.

- 10(c) The GPU EIR concluded this impact to be significant and unavoidable. As stated in responses 10(a) and 10(b) above, implementation of BMPs and compliance with required ordinances would ensure that Project impacts are less than significant. As previously discussed, the GPU EIR determined significant and unavoidable impacts to water quality standards and requirements and groundwater supplies and recharge. However, the proposed Project would have a less-than-significant impact with mitigation to water quality standards and requirements and groundwater supplies and recharge (Hyd-1.2 through Hyd-1.5). Therefore, the Project would be consistent with the analysis within the GPU EIR because it would not create new impacts, increase impacts, and there is no new information of substantial importance than identified within the GPU EIR.

- 10(d) The GPU EIR concluded this impact to be significant and unavoidable. The Project is within the service area of the Rainbow Municipal Water District, which obtains water from the San Diego County Water Authority, which imports water through the Metropolitan Water District of Southern California (MWD). MWD obtains its water from two sources, the Colorado River and the State Water Project. The Project would not use groundwater for its potable water supply. 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 within the GPU EIR because it would not create new impacts, increase impacts, and there is no new information of substantial importance than identified within the GPU EIR.

- 10(e) The GPU EIR concluded this impact to be less than significant with mitigation. The Project would not result in substantial erosion or siltation on or off-site because storm water quality management plans are prepared for both the construction and post-construction phases of the development Project. During the construction phase, the Project would be required to prepare a SWPPP. The SWPPP would implement the following typical erosion control BMPs: hydraulic stabilization hydroseeding and Bonded Fiber Matrix or Stabilized Fiber Matrix on disturbed slopes; County Standard lot perimeter protection detail and mulch, straw, woodchips and soil application for erosion control on disturbed flat areas; energy dissipater outlet protection for water velocity control; silt fencing, and gravel and sand bags for sediment control; stabilized construction entrance, for the prevention of offsite tracking of sediment; and measures to control materials management and waste management.

The SWPPP would be prepared in accordance with Order No. 2009-009-DWQ, NPDES Order CAS000002 CGP adopted by the SWRCB on September 2, 2009. During the post-construction phase, as outlined in the PDP SWQMP dated May 28, 2022, the Project would implement site design, source control and structural BMPs to prevent potential pollutants from entering storm water runoff. The SWQMP has been prepared in accordance with the County of San Diego BMP Design Manual (2019) and SDRWQCB Order No. R9-2013- 0001 Municipal Separate Storm Sewer System (MS4) permit (2013), as adopted by the RWQCB on May 8, 2013.

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

Under existing conditions, the site drains toward the southwest corner of the property. There is one drainage basin, with one outlet point, at the southwest corner to the existing drainage swale. The runoff then drains southerly beyond Linda Vista Drive in the drainage swale.

The development of the project site would not substantially modify the onsite drainage patterns. The site will continue to drain towards the outlet point at the southwest corner of the property. Biofiltration basins would detain runoff; rip-rap would decrease erosive velocities; and brow ditches would safely convey runoff in the historical drainage pattern. 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 conditions, consistent with GPU mitigation measures (Hyd-1.2 through Hyd-1.5). Therefore, the Project would be consistent with the analysis within the GPU EIR because it would not create new impacts, increase impacts, and there is no new information of substantial importance than identified within the GPU EIR.

- 10(f) The GPU EIR concluded this impact to be less than significant with mitigation. The CEQA Level Drainage Study for Lehman TPM prepared by dk Green Consulting, Inc, dated May 31, 2022 determined that the Project would not alter the existing drainage pattern in a manner that would result in flooding on- or off-site.

Under the existing conditions of the project site, there is one drainage basin, with one outlet point, at the southwest corner of the existing drainage swale. The runoff then drains southerly beyond Linda Vista Drive.

The development of the project site would not substantially modify the onsite drainage patterns. The site will continue to drain towards the outlet point at the southwest corner of the property. Biofiltration basins would detain runoff; rip-rap would decrease erosive velocities; and brow ditches 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 (LID) practices and conjunctive use facility, flows leaving the site would be detained to be equal to or 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 regards to flooding with design features and improvements consistent with GPU mitigation measures (Hyd-1.2 through Hyd-1.5). Therefore, the Project would be consistent with the analysis within the GPU EIR because it would not create new impacts, increase impacts, and there is no new information of substantial importance than identified within the GPU EIR.

- 10(g) The GPU EIR concluded this impact to be less than significant with mitigation. Pursuant to the Drainage Study prepared by Omega Engineering & Consultants, Inc and dated October 4, 2021, the Project would detain stormwater onsite and would not increase peak flows; therefore, the Project would not contribute runoff water that would exceed the capacity of existing or planned storm water drainage systems.

As previously discussed, the GPU EIR determined impacts to exceed capacity of stormwater systems as less than significant with mitigation. With mitigation, the proposed Project would have a less-than-significant impact with regards to exceeding the capacity of stormwater systems with mitigation (Hyd-1.2 through Hyd-1.5). Therefore, the Project would be consistent with the analysis within the GPU EIR because it would not create new impacts, increase impacts, and there is no new information of substantial importance than identified within the GPU EIR.

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

As previously discussed, the GPU EIR 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 within the GPU EIR because it would not create new impacts, increase impacts,

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

- 10(i) The GPU EIR concluded this impact to be less than significant with mitigation. No FEMA or County-mapped floodplains were identified on the project site or off-site improvement locations. 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 within the GPU EIR because it would not create new impacts, increase impacts, and there is no new information of substantial importance than identified within the GPU EIR.

- 10(j) The GPU EIR concluded this impact to be less than significant with mitigation. No FEMA or County-mapped floodplains were identified on the project site or off-site improvement locations. 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 within the GPU EIR because it would not create new impacts, increase impacts, and there is no new information of substantial importance than identified within the GPU EIR.

- 10(k) The GPU EIR concluded this impact to be less than significant with mitigation. The 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 within the GPU EIR because it would not create new impacts, increase impacts, and there is no new information of substantial importance than identified within the GPU EIR.

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

The 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 within the GPU EIR

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

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

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

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

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

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

Conclusion

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

1. No peculiar impacts to the Project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. Feasible mitigation measures contained within the GPU EIR (Hyd-1.2 through Hyd-1.5) would be applied to the Project. 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 Watershed Protection Ordinance, Stormwater Standards Manual, and the Resource Protection Ordinance.

Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
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11. Land Use and Planning – Would the Project:

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

Discussion

- 11(a) The GPU EIR concluded this impact to be less than significant with mitigation. The Project does not 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 of San Diego 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 within the GPU EIR because it would not create new impacts, increase impacts, and there is no new information of substantial importance than identified within the GPU EIR.

- 11(b) The GPU EIR concluded this impact to be less than significant. The Project is a minor residential subdivision of a 10.28-acre property into four parcels. The residential use types and density are consistent with the County General Plan Semi-Rural Residential Designation and Regional Category and with the County Zoning Ordinance. 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, 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 within the GPU EIR because it would not create new impacts, increase impacts, and there is no new information of substantial importance than identified within the GPU EIR.

Conclusion

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

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

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

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

12(a) The GPU EIR determined that impacts to mineral resources would be significant and unavoidable. The California Surface Mining and Reclamation Act (SMARA) required classification of land into Mineral Resource Zones (MRZs). The project site has been classified by the California Department of Conservation – Division of Mines and Geology (Update of Mineral Land Classification: Aggregate Materials in the Western San Diego Production-Consumption Region, 1997) as 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 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 within the GPU EIR because it would not create new impacts, increase impacts, and there is no new information of substantial importance than identified within the GPU EIR.

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

Conclusion

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

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

Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
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13. Noise – Would the Project:

- | | | | |
|---|--------------------------|--------------------------|--------------------------|
| a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Discussion

The following Technical Studies were prepared for the Project related to noise.

Acoustical Analysis prepared by Eilar Associates, Inc. dated August 17, 2020.

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

General Plan – Noise Element: Policy 4b addresses noise sensitive areas and requires projects to comply with a Community Noise Equivalent Level (CNEL) of 60 decibels (dBA). Projects which could produce noise in excess of 60 dB(A) are required to incorporate design measures or mitigation as necessary to comply with the Noise Element. Per review of County GIS, the project site is located adjacent to Linda Vista Road, which is within a noise contour that may exceed 60 dB(A).

Noise levels from future traffic traveling on Linda Vista Road were evaluated and determined that future traffic noise levels would not expose existing, foreseeable future, and planned noise sensitive receptors to noise levels that exceed the noise standards. Off-site direct and cumulative noise impacts to off-site residences was also evaluated and determined that project related traffic on nearby roadways would not have a direct noise impact of 3 dBA or more and would not have a significant contribution to the cumulative noise in the area. Direct and cumulative noise impacts to off-site existing residences are not anticipated.

Noise Ordinance – Section 36-404: Non-transportation noise generated by the Project is not expected to exceed the standards of the Noise Ordinance at or beyond the Project's property line. The site is zoned Limited Agriculture (A70) that has a one-hour average sound limit of 50 dBA daytime and 45 dBA nighttime. The surrounding properties to the are also zoned Limited Agriculture (A70). The Project does not involve any noise producing equipment that would exceed applicable noise levels at the adjoining property line.

Noise Ordinance – Section 36-410: The Project will not generate construction noise in excess of Noise Ordinance standards. Construction operations will occur only during permitted hours of operation. Also, it is not anticipated that the Project will operate construction equipment in excess of an average sound level of 75dB between the hours of 7 AM and 7 PM. The Project will implement BMPs, which will ensure that the noise levels from these activities do not exceed the County's Noise Standards.

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

- 13(b) The Project is a subdivision for residential uses which are sensitive to low ambient vibration. However, the residences would be setback more than 200 feet from any Right-of-Way and any property line for parcels zoned industrial or extractive use; or any permitted extractive uses. A setback of 200 feet ensures that the operations do not have any chance of being impacted by groundborne vibration or groundborne noise levels (Harris, Miller Miller and Hanson Inc., Transit Noise and Vibration Impact Assessment 1995).

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

As previously discussed, the GPU EIR determined impacts to excessive groundborne vibration as less than significant with mitigation. The Project would have a less than significant impact. Therefore, the Project would be consistent with the analysis within the GPU EIR because it would not create new impacts, increase impacts, and there is not new information of substantial importance than identified within the GPU EIR.

- 13(c) As indicated in the response listed under Section 13(a), the Project would not expose existing or planned noise sensitive areas in the vicinity of the Project site to a substantial permanent increase in noise levels that exceed the allowable limits of any applicable noise standards with the condition of a County Noise Easement, consistent with GPU EIR mitigation measure Noi-1.1. Also, the Project would not expose existing or planned 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 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 within the GPU EIR because it would not create new impacts, increase impacts, and there is not new information of substantial importance than identified within the GPU EIR.

- 13(d) The GPU EIR concluded this impact to be less than significant with mitigation. The Project does not involve any operational uses that may create substantial temporary or periodic increases in ambient noise levels in the Project vicinity. Construction noise would be subject to the County 75 dBA eight-hour average requirement between 7 am and 7 pm 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 within the GPU EIR because it would not create new impacts, increase impacts, and there is not new information of substantial importance than identified within the GPU EIR.

- 13(e) The GPU EIR concluded this impact to be less than significant with mitigation. The Project is located within the MCAS Camp Pendleton Airport Land Use Compatibility Plan. However, the Project is not located in area which is anticipated to be subject to any regular generation of noise from this airport as identified by the Noise Element of the County's General Plan. Therefore, the Project would be consistent with the analysis within the GPU EIR because it would not create new impacts, increase impacts, and there is not new information of substantial importance than identified within the GPU EIR.

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

Conclusion

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

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

4. Feasible mitigation measures contained within the GPU EIR would be applied to the Project (Noi-1.1). The mitigation measure, as detailed above, would require the Project applicant to conduct an acoustical analysis when a new development is proposed to ensure the project meets the County’s acceptable standards of the County Noise Element. This measure is required through a County Noise Easement.

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

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

Discussion

14(a) The GPU EIR concluded this impact to be less than significant. The project site is subject to the General Plan Regional Category Semi-Rural and the Land Use Designation is Semi-Rural Residential 2 (SR-2), which allows 2 dwelling units per acre. The Project would subdivide a 10.28-acre parcel into 4 residential lots for future development, which is consistent with the density evaluated by the GPU EIR for this setting. The Zoning Use Regulation for the site is Limited Agriculture (A70). 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 within the GPU EIR because it would not create new impacts, increase impacts, and there is not new information of substantial importance than identified within the GPU EIR.

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 within the GPU EIR because it would not create new impacts, increase impacts, and there is not new information of substantial importance than identified within the GPU EIR.

- 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 within the GPU EIR because it would not create new impacts, increase impacts, and there is not new information of substantial importance than identified within the GPU EIR.

Conclusion

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

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

Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
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15. Public Services – Would the Project:

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

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

15(a) The GPU EIR concluded this impact to be less than significant with mitigation for the exception of school services, which remained significant and unavoidable. The Project is a TPM to subdivide 10.28 acres into four lots. The Project does not involve the construction of new or physically altered governmental facilities including but not limited to fire protection facilities, sheriff facilities, schools, or parks in order to maintain acceptable service ratios, response times or other performance service ratios or objectives for any public services. Therefore, the Project would not have an adverse 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 Rainbow Municipal Water District from an existing water line on Linda Vista Drive. The proposed residences would be serviced by on-site wastewater treatment systems. A service availability letter from the District indicated that the it has sufficient capacity to serve the Project.

Fire and emergency protection would be provided by the North County Fire Protection District. The nearest fire station is the North County Fire District Fire Station #2, located at 2180 Winterwarm Dr, Fallbrook, CA 92028 approximately 1.4 miles north. A service availability letter from the North County Fire Protection District indicated that the station has sufficient capacity to serve the Project.

Pursuant to the Project availability forms, students living within this community would attend schools of the Lakeside Union School District and Grossmont Union 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 within the GPU EIR because it would not create new impacts, increase

impacts, and there is not new information of substantial importance than identified within the GPU EIR.

Conclusion

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

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

Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
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16. Recreation – Would the Project:

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

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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b) Does the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?

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

16(a) The GPU EIR concluded this impact to be less than significant with mitigation. The Project would increase the use of existing parks and other recreational facilities; however, the Project would be subject to Park Land Dedication Ordinance (PLDO) fees associated with the Fallbrook Local Planning Area. 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, increase impacts, and there is not new information of substantial importance than identified within the GPU EIR.

16(b) The GPU EIR concluded this impact to be less than significant with mitigation. The Project does not include recreational facilities or require the construction or expansion of recreational facilities. Therefore, the construction or expansion of recreational facilities cannot 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 within the GPU EIR because it would not create new impacts, increase impacts, and there is not new information of substantial importance than identified within the GPU EIR.

Conclusion

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

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

Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
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17. Transportation and Traffic – Would the Project:

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

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

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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e) Result in inadequate emergency access?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

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

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

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

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

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

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

The Project consists of four single-family residential lots. The anticipated traffic to be generated by the project was determined using the San Diego Association of Governments (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 48 Average Daily Trips. The TSG finds that small residential projects which generate less than 110 Average Daily Trips would have a less than significant VMT impact. Therefore, the Project

would be consistent with a locally adopted Senate Bill 743 VMT target which reflects the recommendations provided in the Governor's Office of Planning and Research's Technical Advisory on Evaluating Transportation Impacts in CEQA.

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 within the GPU EIR because it would not create new impacts, increase impacts, and there is not new information of substantial importance than identified within the GPU EIR.

- 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 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 within the GPU EIR because it would not create new impacts, increase impacts, and there is not new information of substantial importance than identified within the GPU EIR.

- 17(c) The GPU EIR concluded this impact to be less than significant with mitigation. The Project site is located within the Airport Land Use Compatibility Plan for MCAS Camp Pendleton. As discussed in Hazards 9(d), the MCAS Camp Pendleton ALUCP finds that projects which are consistent with a local agency's general plan are considered consistent with the ALUCP. The applicant proposes a subdivision that is consistent with all relevant policies and regulations within the County's General Plan. As the Project would be consistent with the existing ALUCP, it would not result in any changes or impacts to existing air traffic patterns. Therefore, the Project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 17(d) The GPU EIR concluded this impact to be significant and unavoidable. The 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 Linda Vista Road would be improved to 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 within the GPU EIR because it would not create new impacts, increase impacts, and there is not new information of substantial importance than identified within the GPU EIR.

- 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 the construction of a turn-around for fire apparatus on each proposed private driveway. The turn-around/access roads would be constructed to meet County Fire Code Standard 503.2.6. Driveways 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 within the GPU EIR because it would not create new impacts, increase impacts, and there is not new information of substantial importance than identified within the GPU EIR.

- 17(f) The GPU EIR concluded this impact to be significant and unavoidable. The Project is not within the vicinity of any planned public transit or pedestrian facilities. The Project frontage along Linda Vista Drive is part of a planned route within the County of San Diego's Community Bike Plan, the Via Encinos Dr / Knottwood Way Class II Bike Path. A Class II Bike Path 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 this bike path. 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 within the GPU EIR because it would not create new impacts, increase impacts, and there is not new information of substantial importance than identified within the GPU EIR.

Conclusion

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

1. No peculiar impacts to the Project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.

3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. Feasible mitigation measures contained within the GPU EIR would be applied to the Project (Tra-4.2). The mitigation measures, as detailed above, would require the Project applicant to comply with the County Public Road Standards, Guidelines for Determining Significance, coordinate with other jurisdictions to identify appropriate mitigation and implement the Building and Fire Codes to ensure adequate services are in place.

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

Discussion

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

As previously discussed, the GPU EIR determined impacts on wastewater treatment requirements as less than significant with mitigation. As the Project would have a less-than-significant impact for the reasons detailed above, the Project would be consistent with the analysis within the GPU EIR because it would not create new impacts, increase impacts, and there is not new information of substantial importance than identified within 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 Rainbow Municipal Water District. According to water service availability form dated July 2019, adequate water resources and entitlements are available to serve the Project. In addition, the Project would utilize on-site wastewater treatment systems, and therefore would not rely on any public wastewater facilities. 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 within the GPU EIR because it would not create new impacts, increase impacts, and there is not new information of substantial importance than identified within the GPU EIR.

- 18(c) The GPU EIR concluded this impact to be less than significant with mitigation. The Project involves new storm water 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 within the GPU EIR because it would not create new impacts, increase impacts, and there is not new information of substantial importance than identified within the GPU EIR.

18(d) The GPU EIR concluded this impact to be significant and unavoidable. The Project would receive water from the Rainbow Municipal Water District which has adequate water to serve the Project according to the water service availability form dated July 2019. As the Project would have a less-than-significant impact, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

18(e) The GPU EIR concluded this impact to be less than significant with mitigation. The Project would utilize on-site wastewater treatment systems, and therefore would not rely on any public wastewater facilities. 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 within the GPU EIR because it would not create new impacts, increase impacts, and there is not new information of substantial importance than identified within the GPU EIR.

18(f) The GPU EIR concluded this impact to be less than significant. 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 within the GPU EIR because it would not create new impacts, increase impacts, and there is not new information of substantial importance than identified within the GPU EIR.

18(g) The GPU EIR concluded this impact to be less than significant. The Project would deposit all solid waste at a permitted solid waste facility. Therefore, the Project would be consistent with the analysis within the GPU EIR because it would not create new impacts, increase impacts, and there is not new information of substantial importance than identified within the GPU EIR.

Conclusion

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

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

Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
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19. Wildfire – If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the Project:

- | | | | |
|--|--------------------------|--------------------------|--------------------------|
| a) Substantially impair an adopted emergency response plan or emergency evacuation plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts in the environment? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| d) Expose people or structures to significant risk, including downslopes or downstream flooding or landslides, as a result of runoff, post-fire instability, or drainage changes? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Discussion

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

19(a) The GPU EIR concluded this impact to be significant and unavoidable. The project site is located within the Moderate Fire Hazard Severity Zone. Fire and emergency protection would be provided by the North County Fire Protection District. The nearest fire station is the North County Fire District Fire Station #2, located at 2180 Winterwarm Dr, Fallbrook, CA 92028 approximately 1.4 miles north. A service availability letter from the North County Fire Protection District indicated that the station has sufficient capacity to serve the Project.

The project site has an Emergency Response Travel Time of 8 minutes, which meets the General Plan Safety Element standard of 10 minutes for lands designated as Semi-Rural Residential 2 (SR-2).

The Project access from Linda Vista Road would meet County road standards. A turn-around for fire apparatus would be constructed in each proposed driveway, designed to meet the County of San Diego Fire Code Standard 503.2.6.

As previously stated, Wildfire was analyzed within the GPU EIR within Section 2.7, Hazards and Hazardous Materials and was determined to be significant and unavoidable. 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, increase impacts, and there is not new information of substantial importance than identified within the GPU EIR.

- 19(b) The GPU EIR concluded this impact to be significant and unavoidable. The Project is within the Moderate Fire Hazard Severity Zone and within the Urban-Wildland Interface Zone. The Project would comply with regulations relating to emergency access, water supply, and defensible space specified in the County Fire Code and Consolidated Fire Code. Specifically, 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. Each proposed driveway would have a fire apparatus turn around 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 mitigation measure Haz-4.3. In addition, the Project is consistent with the Zoning Ordinance and the density established under the County of San Diego General Plan. Therefore, for the reasons stated above, the Project would not be expected to experience exacerbated wildfire risks due to slope, prevailing, winds or other factors.

As previously stated, Wildfire was analyzed within the GPU EIR within Section 2.7, Hazards and Hazardous Materials and was determined to be significant and unavoidable. 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 within the GPU EIR because it would not create new impacts, increase impacts, and there is not new information of substantial importance than identified within the GPU EIR.

- 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 Rainbow Water 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 within the GPU EIR because it would not create new impacts, increase impacts, and there is not new information of substantial importance than identified within the GPU EIR.

- 19(d) The GPU EIR concluded this impact to be significant and unavoidable. As previously stated in 19(b), the Project would comply with regulations relating to emergency access, water supply, and defensible space specified in the County Fire Code and Consolidated Fire Code. The site is 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 will 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 with for the reasons detailed above. Therefore, the Project would be consistent with the analysis within the GPU EIR because it would not create new impacts, increase impacts, and there is not new information of substantial importance than identified within the GPU EIR.

Conclusion

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

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

Appendices

Appendix A – References

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

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

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:

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

Scheidt, Vincent N.; (May 2022) Biological Resources, Project Impacts, and Proposed Mitigation
The Lehman Tentative Parcel Map Project

Green, Kristin L.; dk Green Consulting, Inc. (May 2022), CEQA Level Drainage Study for Lehman
TPM.

Green, Kristin L.; dk Green Consulting, Inc. (May 2022), Stormwater Quality Management Plan
for Priority Development Projects

San Diego Association of Governments, (April 2022), (Not So) Brief Guide of Vehicular Traffic
Generation Rates for the San Diego Region

Wade, Sue A; Heritage Resources, (November 2020, Lehman Tentative Parcel Map
Archeological Survey – Negative Findings

Amy Hool; Eilar Associates, Inc, (August 2020), Acoustical Analysis for Lehman Tentative
Parcel Map

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

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