



County of San Diego

DAHVIA LYNCH
DIRECTOR

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

VINCE NICOLETTI
ASSISTANT DIRECTOR

June 20, 2024

Environmental Review Update Checklist Form For projects with Previously Approved Environmental Documents

FOR PURPOSES OF CONSIDERATION OF

COUNTY OF SAN DIEGO GRADING, CLEARING, AND WATERCOURSES ORDINANCE AMENDMENT, PDS2021-POD-21-005

The California Environmental Quality Act (CEQA) Guidelines Sections 15162 through 15164 set forth the criteria for determining the appropriate additional environmental documentation, if any, to be completed when there is a previously adopted Negative Declaration (ND) or a previously certified environmental impact report (EIR) covering the project for which a subsequent discretionary action is required. This Environmental Review Update Checklist Form has been prepared in accordance with CEQA Guidelines Section 15162 and 15163 to explain the rationale for determining whether any additional environmental documentation is needed for the subject discretionary action.

The Project will include, but is not limited to, changes to the grading and clearing requirements, thresholds for permit requirements, and permit process and evaluation of providing a ministerial permit process for grading and/or clearing for housing located in Vehicle Miles Travelled (VMT) Efficient or Infill Areas. The Project will require a Supplemental Environmental Impact Report (SEIR) as determined in the Notice of Preparation (NOP).

1. Background on the previously certified EIR:

The 2011 San Diego County General Plan Program Environmental Impact Report (GPU PEIR or PEIR) applies to the unincorporated area of San Diego County (County) and is the County's long-term blueprint for the vision of the future. It reflects an environmentally sustainable approach to planning that balances the need for adequate infrastructure, housing, and economic vitality while maintaining and preserving existing communities, agricultural areas, and open spaces.

San Diego County is approximately 2.9 million acres of which 2.2 million acres are unincorporated areas. Within the unincorporated area, the County's land-use jurisdiction

is limited by tribal lands, state and federally owned lands, and military installations including Marine Corps Base Camp Pendleton. As a result, the County has land use jurisdiction over 772,239 acres (35%) of the unincorporated area.

In 2011, the Board of Supervisors (Board) approved the update to the County's General Plan. Changes to the General Plan included:

- Reduced Land Use Capacity by 46,363 units (15%) to 239,984 units,
- Focused development in village cores to retain the County's rural character,
- Shifted 20% of the remaining dwelling unit capacity to the most western portions of the unincorporated area, and
- Located 80% of the dwelling unit capacity where water can be imported and distributed by the San Diego County Water Authority (SDCWA).

2. Lead agency name and address:

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

3. Contact: Grace Bodenchak, Project Manager

Phone number: (619) 985-1092

E-mail: grace.bodenchak@sdcounty.ca.gov

4. Project location:

San Diego County is bounded by the Counties of Orange and Riverside to the north, the County of Imperial to the east, the United States–Mexico international border to the south, and the Pacific Ocean to the west. The Project comprises a countywide Ordinance amendment and would affect properties in unincorporated portions of the county that are under the land use jurisdiction of the County. Therefore, it would not apply to lands in incorporated cities or to state, federal, or tribal lands. More specifically, the Project would apply to those unincorporated properties that have agricultural uses or are zoned for residential uses. Agricultural operations occur throughout the unincorporated area, which is mostly concentrated in the central portion of the county, with a growing number of agricultural uses in north county areas. Residential zoning is located throughout the unincorporated county. Access to and from the unincorporated county is provided by interstates, local state routes and County roads.

5. Project Applicant name and address:

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

- 6. General Plan
 - Community Plan: Various
 - Land Use Designation: Various
- 7. Zoning
 - Use Regulation: Various
 - Minimum Lot Size: Various
 - Special Area Regulation: Various
- 8. Project Background:

The County Grading, Clearing, and Watercourses Ordinance (Ordinance) was initially adopted in 1996 to establish regulations and procedures for permitting earth movement (grading) and removing vegetation (clearing) to ensure public safety by preventing slope failure, foundation failure, expansive soil damage, and erosion and drainage problems. It is composed of nine chapters containing information related to thresholds for permit requirements, permit fees, regulations, and design standards for applicable development and contains related definitions. The Ordinance explicitly requires compliance with all applicable federal and state requirements and defines “grading” as any excavating, filling, or a combination of the two.

As part of the County’s commitment to addressing the affordable housing crisis in the unincorporated area of San Diego, on October 10, 2018, the Board accepted the Report of Options to Improve Housing Affordability in the Unincorporated Area. The report identified opportunities to address lack of housing supply and to improve areas within the control of the County such as local regulations and the local permitting processes and named the Ordinance as one of several Land Development Codes for potential to be updated to remove inconsistencies and create an understandable set of regulations to guide development in the unincorporated area. Agricultural stakeholders commented that streamlining the process for Agricultural Clearing Permits was also needed. As a result, the Board directed staff to complete an update to the Ordinance through a bifurcated approach separating agricultural clearing permits from the grading for residential housing projects. Although agricultural clearing is not a housing affordability item, it became linked to a larger effort to update the Ordinance for housing-related grading.

On May 19, 2021, staff returned to the Board to present recommendations to streamline the process for Agricultural Clearing Permits. The Board directed staff to amend the Ordinance to consolidate the agricultural regulations into a single chapter within the Ordinance while maintaining existing requirements, to clarify language and add missing definitions (Part 1) and pursue a comprehensive update to the Ordinance to address agricultural and residential clearing and grading including reviewing requirements, thresholds, and permit processes. It should be noted that Part 1 did not propose any development. Part 1 is complete and was adopted by the Board on August 17, 2022. The remaining action is included in this Project.

On May 24, 2023, the Board accepted the Options for Removing Barriers to Housing and Facilitating the County's Status as a Prohousing Jurisdiction (Report). The Report identified short, mid, and long-term actions that could facilitate and remove barriers to housing. As part of the short-term actions, the Board directed staff to update the Ordinance to allow for by-right ministerial grading permits for by-right housing projects authorized by state law. The Ordinance update was proposed to be in alignment with state law, clarifying that any by-right housing projects under state law are ministerial under the County's Ordinance and therefore, would not require environmental review under CEQA. This update was part of the County's effort to address the affordable housing crisis within the unincorporated area and builds on the Board's previous directions to amend the Ordinance. This Ordinance update was adopted by the Board on March 13, 2024.

Also on May 24, 2023, as part of the long-term actions, the Board directed staff to update the Ordinance to prepare a checklist to allow ministerial grading permits within VMT Efficient Areas and Infill Areas if they meet certain criteria. This action is also included in this Project.

9. Project Description:

As part of the Board's direction, the County proposes to amend the existing Ordinance to update the clearing (e.g., removing vegetation) and grading (e.g., earth movement) permit process to address agricultural and residential clearing and grading requirements (referred to as the Project or Ordinance Update). The Project will include, but is not limited to, changes to the grading and clearing requirements, thresholds for permit requirements, and permit process. The Project will include evaluation and recommendations of providing a ministerial permit process for grading and/or clearing for housing located in VMT Efficient or Infill Areas as defined by the County's Transportation Study Guide (TSG). Options may also be included to keep the current regulations and requirements for clearing and grading in place.

The Project requires an amendment to the Ordinance. Discretionary permits/actions associated with the Project will be listed in the Project Description for the SEIR as required by CEQA. Following the NOP the County will prepare an SEIR that will list project approvals, as well as any other County approvals necessary or desirable to implement the Project, or other regulatory agency permits.

10. Surrounding land uses and setting:

The unincorporated county is bordered by the incorporated areas of the county to the west, which is bordered by the Pacific Ocean; to the east by Imperial County; to the north by Orange and Riverside Counties; and to the south by Mexico. The county terrain varies from west to east, sloping up from the ocean, transitioning to rolling hills and then steep mountains that finally give way to flat to gently sloping deserts. The county is a generally semi-arid environment and supports a wide range of habitats and biological communities. These habitats and communities range from grasslands to shrublands to coniferous forests. Additionally, these habitats and communities vary greatly depending on the ecoregion, soils and substrate, elevation and topography. The urban areas of

the county are predominantly in the west, either surrounding the City of San Diego, or interspersed between the City of San Diego and the cities in Orange and Riverside counties. Farther east, the land is less developed, with the largest developed area in the eastern portion of the county being the community of Borrego Springs. The eastern portion of the county is unincorporated and mostly undeveloped. The areas that have been developed in the eastern portion of the county have been predominantly developed in a rural fashion, with large lot sizes, agricultural or related uses, and limited infrastructure and service availability.

11. Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement): None identified at this time.

11. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code §21080.3.1? If so, has consultation begun?

YES	NO
<input checked="" type="checkbox"/>	<input type="checkbox"/>

Note: Conducting consultation early in the CEQA process allows tribal governments, public lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process (see California Public Resources Code, Section 21083.3.2). Information is also available from the Native American Heritage Commission’s Sacred Lands File per California Public Resources Code, Section 5097.96, and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that California Public Resources Code, Section 21082.3(e), contains provisions specific to confidentiality.

PROBABLE ENVIRONMENTAL EFFECTS OF THE PROJECT: The environmental factors checked below would be potentially affected by this Project and involve at least one impact that is a “Potentially Significant Impact” or a “Less Than Significant With Mitigation Incorporated,” as indicated by the checklist on the following pages.

- | | | |
|---|--|---|
| <input checked="" type="checkbox"/> Aesthetics | <input checked="" type="checkbox"/> Agriculture & Forestry Resources | <input checked="" type="checkbox"/> Air Quality |
| <input checked="" type="checkbox"/> Biological Resources | <input checked="" type="checkbox"/> Cultural Resources | <input checked="" type="checkbox"/> Energy |
| <input checked="" type="checkbox"/> Geology/Soils | <input checked="" type="checkbox"/> Greenhouse Gas Emissions | <input checked="" type="checkbox"/> Hazards/Hazardous Materials |
| <input checked="" type="checkbox"/> Hydrology/Water Quality | <input checked="" type="checkbox"/> Land Use/Planning | <input checked="" type="checkbox"/> Mineral Resources |

- | | | |
|---|--|--|
| <input checked="" type="checkbox"/> Noise | <input checked="" type="checkbox"/> Population/Housing | <input type="checkbox"/> Public Services |
| <input checked="" type="checkbox"/> Recreation | <input checked="" type="checkbox"/> Transportation | <input checked="" type="checkbox"/> Tribal Cultural Resources |
| <input checked="" type="checkbox"/> Utilities/Service Systems | <input checked="" type="checkbox"/> Wildfire | <input checked="" type="checkbox"/> Mandatory Findings of Significance |

DETERMINATION:


On the basis of this analysis, Planning & Development Services has determined that:

- No substantial changes are proposed in the project and there are no substantial changes in the circumstances under which the project will be undertaken that will require major revisions to the previous EIR or ND due to the involvement of significant new environmental effects or a substantial increase in the severity of previously identified significant effects. Also, there is no “new information of substantial importance” as that term is used in CEQA Guidelines Section 15162(a)(3). Therefore, the previously adopted ND or previously certified EIR is adequate upon completion of an ADDENDUM.

- No substantial changes are proposed in the project and there are no substantial changes in the circumstances under which the project will be undertaken that will require major revisions to the previous EIR or ND due to the involvement of significant new environmental effects or a substantial increase in the severity of previously identified significant effects. Also, there is no “new information of substantial importance” as that term is used in CEQA Guidelines Section 15162(a)(3). Therefore, because the project is a residential project in conformance with, and pursuant to, a Specific Plan, with a EIR completed after January 1, 1980, the project is exempt pursuant to CEQA Guidelines Section 15182.

- Substantial changes are proposed in the project or there are substantial changes in the circumstances under which the project will be undertaken that will require major revisions to the previous ND due to the involvement of significant new environmental effects or a substantial increase in the severity of previously identified significant effects. Or, there is “new information of substantial importance,” as that term is used in CEQA Guidelines Section 15162(a)(3). However all new significant environmental effects or a substantial increase in severity of previously identified significant effects are clearly avoidable through the incorporation of mitigation measures agreed to by the project applicant. Therefore, a SUBSEQUENT ND is required.

- Substantial changes are proposed in the project or there are substantial changes in the circumstances under which the project will be undertaken that will require major revisions to the previous EIR due to the involvement of significant new environmental effects or a substantial increase in the severity of previously identified significant effects. Or, there is “new information of substantial importance,” as that term is used in CEQA Guidelines Section 15162(a)(3). Therefore, a SUBSEQUENT or SUPPLEMENTAL ENVIRONMENTAL IMPACT REPORT EIR is required.



Signature

Grace Bodenach

Printed Name

June 20, 2024

Date

CEQA Project Manager

Title

INTRODUCTION

CEQA Guidelines Sections 15162 through 15164 set forth the criteria for determining the appropriate additional environmental documentation, if any, to be completed when there is a previously adopted ND or a previously certified EIR for the project.

CEQA Guidelines, Section 15162(a) and 15163 state that when an ND has been adopted or an EIR certified for a project, no Subsequent or Supplemental EIR or Subsequent Negative Declaration shall be prepared for that project unless the lead agency determines, on the basis of substantial evidence in light of the whole public record, one or more of the following:

1. Substantial changes are proposed in the project which will require major revisions of the previous EIR or Negative Declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.
2. Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or Negative Declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.
3. New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the Negative Declaration was adopted, shows any of the following:
 - a. The project will have one or more significant effects not discussed in the previous EIR or Negative Declaration; or
 - b. Significant effects previously examined will be substantially more severe than shown in the previously adopted Negative Declaration or previously certified EIR; or
 - c. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
 - d. Mitigation measures or alternatives which are considerably different from those analyzed in the previous Negative Declaration or EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

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CEQA Guidelines, Section 15164(a) states that an Addendum to a previously certified EIR may be prepared if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a Subsequent or Supplemental EIR have occurred.

CEQA Guidelines, Section 15164(b) states that an Addendum to a previously adopted Negative Declaration may be prepared if only minor technical changes or additions are necessary.

If the factors listed in CEQA Guidelines Sections 15162, 15163, or 15164 have not occurred or are not met, no changes to the previously certified EIR or previously adopted ND are necessary.

The following responses detail any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that may cause one or more effects to environmental resources. The responses support the "Determination," above, as to the type of environmental documentation required, if any.

I. AESTHETICS – Since the previous EIR was certified or previous ND was adopted, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that cause one or more effects to aesthetic resources including: scenic vistas; scenic resources including, but not limited to, trees, rock outcroppings, or historic buildings within a state scenic highway; existing visual character or quality of the site and its surroundings; or day or nighttime views in the area?

YES NO

2011 San Diego County General Plan Update PEIR

The County General Plan Update Program Environmental Impact Report (GPU PEIR or PEIR) determined that implementation of the General Plan Update would have potentially significant impacts associated with scenic vistas and scenic resources. However, all potentially significant impacts would be reduced to a less than significant level with incorporation of mitigation described below. The PEIR also determined that implementation of the General Plan Update would result in significant and unavoidable impacts with regard to degradation of the existing visual character or quality of the site and its surroundings; and with creation of a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

2011 GPU PEIR Mitigation Measures

- Aes-1.1** Adopt the General Plan Regional Category Map and Land Use Maps which locate land uses of less density or intensity on lands that contribute to scenic vistas.

- Aes-1.2** Protect sensitive biological habitats and species through regulations that require avoidance and mitigation of impacts. Existing programs include the County MSCP and associated BMOs, RPO, and CEQA Guidelines. While protecting biological resources, these programs also preserve natural open space that contributes to the quality of many of the County's scenic vistas.

- Aes-1.3** Amend community plans with improved vision and community character statements to ensure that new development reflects the character and visions for each individual unincorporated community. Community plans are used to review development projects (including General Plan Amendments). These reviews are implemented by State law, County policy and procedures, the Subdivision Ordinance, Zoning Ordinance findings for certain permits, CEQA compliance, etc. The Community Plans also serve as the foundation for more detailed implementing regulations such as design review guidelines, Zoning box regulations, etc. Community Plans are also used for the interjurisdictional review and coordination on project conducted by other agencies.

- Aes-1.4** Revise the Design Review process to streamline the process, improve consistency in implementation, and update design criteria as necessary. Current components of that process include Special Area Designators, Design Review Guidelines, and the Site Plan review and approval process.
- Aes-1.5** Create a Conservation Subdivision Program that facilitates conservation-oriented project design.
- Aes-1.6** Require that project approvals with significant potential to adversely affect the scenic quality of a community require community review and specific findings of community compatibility. Examples can be found in the Zoning Ordinance with the numerous special uses or exceptions allowed pursuant to Administrative and Use Permits, and Site Plans. This practice has been proven useful for reducing impacts to aesthetic resources and their usefulness will increase as community plans and design guideline are updated pursuant to Aes-1.3 and Aes-1.4.
- Aes-1.7** Develop and implement programs and regulations that preserve agricultural lands (such as the County’s CEQA guidelines and the Farm Program). Most existing agricultural lands are key components of scenic vistas and community character and the preservation of these resources is critical to minimizing impacts to these resources.
- Aes-1.8** Continue to develop and implement programs and regulations that minimize landform alteration and preserve ridgelines and steep slopes where appropriate. Examples include the County’s Grading Ordinance, RPO, and CEQA Guidelines.
- Aes-1.9** Work with communities and other stakeholders to identify key scenic vistas, viewsheds of County scenic road and highways, and other areas of specific scenic value. Apply Resource Conservation Area designations or other special area designators, guidelines, and tools to guide future development of parcels within these viewsheds to avoid impacts to the scenic vistas.
- Aes-1.10** Participate in regional planning and planning by agencies operating within or adjacent to the County to the extent practicable. This includes participation in SANDAG and other regional planning forums, reviewing and commenting on planning and environmental documents issued by other agencies, and ongoing collaboration with Native American tribes and adjacent jurisdictions.
- Aes-1.11** Implement the Wireless Communications Ordinance and BOS Policies I-92 and J-17 to encourage the undergrounding of utilities.
- Aes-3.1** Improve upon the County road standards or other right of way design guidelines to provide standards related to road design, parking, landscaping, and elements of the public realm that to are critical to the character of a community.

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- Aes-3.2** Implement existing and prepare new community right-of-way development standards, as appropriate, that supplement the County road standards in order to recognize the unique constraints and character of different communities.
- Aes-4.1** Coordinate with communities and stakeholders to review light pollution controls and consider amendments or expansions to those controls as determined necessary to reduce impacts to dark skies that are important to community character.
- Aes-4.2** Maintain light and glare regulations that minimize impacts to adjacent properties, sensitive areas, community character, observatories, and dark skies. These regulations are currently found in the Light Pollution Code and Zoning Ordinance. Additional reviews are implemented on discretionary projects in accordance with CEQA and the County's CEQA guidelines.
- Aes-4.3** Participate in regional planning and planning by agencies operating within or adjacent to the County to the extent practicable. This includes participation in SANDAG and other regional planning forums, reviewing and commenting on planning and environmental documents issued by other agencies, and ongoing collaboration with Native American tribes and adjacent jurisdictions.

Substantial changes are proposed by the Project which may result in new significant impacts or increased severity in previously identified significant impacts, and in new mitigation measures and alternatives. A visual impact analysis will be required to evaluate potentially significant impacts to visual resources that might result from features specific to the proposal using the current County significance guidelines and report format. This issue will be fully discussed in the SEIR.

A. Scenic Vistas

Supplemental Analysis Required: Certain areas in the county have been designated as Resource Conservation Areas for the purposes of informing future planning decisions. Resource Conservation Areas include but are not limited to areas of aesthetic quality, groundwater problem areas, coastal wetlands, native wildlife habitats, construction quality sand areas, littoral sand areas, astronomical dark skies areas, scenic geologic formations, and significant archaeological and historical sites. The Project will include, but is not limited to, changes to the grading and clearing requirements, thresholds for permit requirements, and permit process. The Project will include evaluation of providing a ministerial permit process for grading and/or clearing for housing located in VMT Efficient or Infill Areas. Construction activities associated with the implementation of the Ordinance Amendment could result in the obstruction, interruption, or detracting of a scenic vista. Therefore, the Project could result in a potentially significant impact on scenic vistas. This issue will be analyzed further in the SEIR.

B. Scenic resources including, but not limited to, trees, rock outcroppings, or

historic buildings within a state scenic highway

Supplemental Analysis Required: Only two highways in the unincorporated county have been designated as a state scenic highway: State Route (SR-) 78 through the Anza-Borrego Desert State Park and SR-125 between Interstate (I-) 8 and SR-94. Eligible scenic highways include portions of I-5, I-15, SR-94, I-8, SR-79, SR-78, and SR-76 within the unincorporated County. The Project will include, but is not limited to, changes to the grading and clearing requirements, thresholds for permit requirements, and permit process. The Project will include evaluation of providing a ministerial permit process for grading and/or clearing for housing located in VMT Efficient or Infill Areas. Construction activities associated with the implementation of the Ordinance Update could result in potential impacts to scenic resources through the removal or substantial adverse change of features that contribute to the valued visual character or image of the community, state scenic highway, or localized area. Therefore, the impact on designated scenic highways and, more generally, scenic resources could be significant. This issue will be analyzed further in the SEIR.

C. Existing visual character or quality of the site and its surroundings

Supplemental Analysis Required: Visual character in the county is characterized by diverse natural vistas and scenic environments that range from the ocean to the desert. The existing visual character and quality of lands throughout the unincorporated areas of the county vary. The County proposes to amend the Ordinance to include changes to the grading and clearing requirements, thresholds for permit requirements, and permit process. The Project will include evaluation of providing a ministerial permit process for grading and/or clearing for housing located in VMT Efficient or Infill Areas. Construction activities associated with the implementation of the Ordinance Update could alter the existing visual character or quality of the non-urbanized areas of the unincorporated areas of the county. In addition, further discussion is needed to determine if reasonably foreseeable future projects could result in inconsistencies with applicable zoning and other regulations governing scenic quality. Therefore, impacts on visual character or quality could be potentially significant. This issue will be analyzed further in the SEIR.

D. Day or nighttime views in the area

Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR: The County's Light Pollution Code (LPC), or the Dark Sky Ordinance, was adopted "to minimize light pollution for the enjoyment and use of property and the night environment by the citizens of San Diego County and to protect the Palomar and Mount Laguna observatories from the effects of light pollution that have a detrimental effect on astronomical research by restricting the permitted use of outdoor light fixtures on private property" (Section 59.101). The LPC regulates applicants for any permit required by the County for work involving outdoor light fixtures unless exempt. The LPC designates all areas within a 15-mile radius of each observatory as Zone A, with all other areas designated as Zone B. Zone A has more stringent lighting restrictions, including limits on decorative lighting, due to its proximity to the observatories.

The County proposes to amend the Ordinance to update the clearing and grading permit process and evaluate a ministerial process for housing in VMT Efficient and Infill areas. Construction activities associated with the implementation of the Ordinance Update would be subject to the provisions of the County's Zoning Ordinance Outdoor Lighting Regulations (Section 6300) and the County's Code of Regulatory Ordinances, Sections 59.101–59.115, LPC, in order to minimize impacts of new light pollution on nighttime views. The LPC, also known as the Dark Sky Ordinance, regulates projects involving outdoor light fixtures within a 15-mile radius of Palomar and Mount Laguna observatories. It is unlikely that clearing and grading activities would result in sources of substantial light or glare that would affect day or nighttime views. Grading and clearing operations do not require substantial sources of light, and equipment (e.g., dozer, backhoe, excavator) would not emit significant amounts of glare. Impacts would be less than significant. This issue will not be analyzed further in the SEIR.

II. AGRICULTURE AND FORESTRY RESOURCES - Since the previous EIR was certified or previous ND was adopted, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that cause one or more effects to agriculture or forestry resources including: conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to a non-agricultural use, conflicts with existing zoning for agricultural use or Williamson Act contract, or conversion of forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?

YES	NO
<input checked="" type="checkbox"/>	<input type="checkbox"/>

2011 San Diego County General Plan Update PEIR

The GPU PEIR determined that implementation of the General Plan Update would have significant and unavoidable impacts associated with the direct and indirect conversion of agricultural resources to non-agricultural use. Mitigation measures (described below) would reduce impacts associated with direct and indirect conversion of agricultural resources, but not to below a significant level. The PEIR also determined that implementation of the General Plan Update would have a potentially significant impact related to conflicts with agricultural zoning or Williamson Act Contract lands. However, all potentially significant impacts would be reduced to a less than significant level with implementation of mitigation.

2011 GPU PEIR Mitigation Measures

- Agr-1.1** Implement the General Plan Regional Category map and Land Use Maps which protect agricultural lands with lower density land use designations that will support continued agricultural operations.
- Agr-1.2** Develop and implement programs and regulations that protect agricultural

lands (such as the CEQA guidelines, Zoning Ordinance, Right to Farm Act, Open Space Subvention Act, Farm and Ranch Lands Protection Program, San Diego County Agricultural Enterprises and Consumer Information Ordinance, BOS Policy I-133, and the San Diego County Farming Program), as well as, those that support implementation of the Williamson Act (including the CEQA guidelines, Zoning Ordinance, and Subdivision Ordinance).

- Agr-1.3** Create a Conservation Subdivision Program that facilitates conservation-oriented project design through changes to the Subdivision Ordinance, Resource Protection Ordinance, Zoning Ordinance, Groundwater Ordinance, and other regulations as necessary with the goal of promoting conservation of natural resources and open space (including agricultural lands) while improving mechanisms for flexibility in project design so that the production of housing is not negatively impacted.
- Agr-1.4** Develop and implement the PACE program which compensates landowners for voluntarily limiting future development on their land.
- Agr-1.5** Revise community plans to identify important agricultural areas within them and specific compatible uses and desired buffers necessary to maintain the viability of that area. Community plans are used to review development projects (including General Plan Amendments).
- Agr-2.1** Prior to the approval of any Zoning Ordinance Amendment that would result in the removal of an “A” designator from a certain property, an analysis shall be conducted to ensure that the action removing such a designation will not result in any significant direct or indirect adverse impact to a Williamson Act Contract lands.

Agricultural resources and clearing analysis will be prepared to analyze the Project’s consistency with CEQA Appendix G and the County Guidelines for Determining Significance, Agricultural Resources, such as conversion of Farmland associated with the Ordinance amendment. A brief discussion is provided below; however, this issue will be fully analyzed in the SEIR.

A. Conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to a non-agricultural use

Supplemental Analysis Required: According to the GPU PEIR, Farmland Mapping and Monitoring Program (FMMP) agricultural and grazing land totals for San Diego county are identified at 314,032 acres. The Project will include, but is not limited to, changes to the grading and clearing requirements, thresholds for permit requirements, and permit process. The Project will include evaluation of providing a ministerial permit process for grading and/or clearing for housing located in VMT Efficient or Infill Areas. It is unlikely that implementation of the Ordinance Update would result in the conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the FMMP of the California Natural Resources Agency,

or other agricultural resources, to non-agricultural use. However, Project impacts will be evaluated in the SEIR to determine the potential to convert Farmland to non-agricultural use. This issue will be analyzed further in the SEIR.

B. Conflict with existing zoning for agricultural use or Williamson Act contract

Supplemental Analysis Required: The County proposes to amend the Ordinance to update the clearing and grading permit process for agricultural and residential. It is unlikely that implementation of the Ordinance Update would conflict with existing zoning for agricultural use and Williamson Act contract lands. However, project impacts will be evaluated in the SEIR to determine the potential to conflict with zoning or a Williamson Act contract. This issue will be analyzed further in the SEIR.

C. Conversion of forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))

Supplemental Analysis Required: California Public Resources Code, Section 12220(g), defines forest land as land that can support a 10 percent native tree cover (any species) under natural conditions that allows for biodiversity, water quality, recreation, and other public benefits. The County does not contain land that has been specifically designated (i.e., zoned) for forest land, timberland, or timberland production. However, the site of future grading or clearing may contain vegetation communities that can support a native tree cover (any species) under natural conditions. Impacts could potentially be significant and further discussion in the SEIR is warranted.

The U.S. Forest Service defines a forested area as “forest land” if it is at least 1 acre in size and at least 10 percent occupied by forest trees of any size or an area that formerly had such tree cover and is not currently developed for non-forest use. Non-forest uses may include cropland, pasturelands, residential areas, and other land uses. Forest land includes transition zones, which are those areas between heavily forested and non-forested lands that are at least 10 percent stocked with forest trees, as well as forest areas adjacent to urban and built-up lands (County of San Diego 2016). The Project will include, but is not limited to, changes to the grading and clearing requirements, thresholds for permit requirements, and permit process. The Project will include evaluation of providing a ministerial permit process for grading and/or clearing for housing located in VMT Efficient or Infill Areas. Although not specifically zoned for such uses, implementation of the Ordinance Update could directly or indirectly result in conflict with existing vegetation communities that support a native tree cover. This issue will be analyzed further in the SEIR.

D. Loss of forest land or conversion of forest land to non-forest use

Supplemental Analysis Required: See Section II(c). Implementation of the Project could directly or indirectly result in the loss of forest land or the conversion of forest land to non-forest use. This issue will be analyzed further in the SEIR.

E. Conversion of Farmland to non-agricultural use or conversion of forest land

to non-forest use

Supplemental Analysis Required: The Project will include, but is not limited to, changes to the grading and clearing requirements, thresholds for permit requirements, and permit process. The Project will include evaluation of providing a ministerial permit process for grading and/or clearing for housing located in VMT Efficient or Infill Areas. It is unlikely that implementation of the Ordinance Update could result in the conversion of Important Farmland or other agricultural resources to non-agricultural use. However, project impacts will be evaluated in the SEIR to determine the potential to convert farmland to non-agricultural use or forest land to non-forest use. This issue will be analyzed further in the SEIR.

III. AIR QUALITY - Since the previous EIR was certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or “new information of substantial importance” that cause one or more effects to air quality including: conflicts with or obstruction of implementation of the San Diego Regional Air Quality Strategy (RAQS) or applicable portions of the State Implementation Plan (SIP); violation of any air quality standard or substantial contribution to an existing or projected air quality violation; 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; exposure of sensitive receptors to substantial pollutant concentrations; or creation of objectionable odors affecting a substantial number of people?

YES	NO
<input checked="" type="checkbox"/>	<input type="checkbox"/>

2011 San Diego County General Plan Update PEIR

The GPU PEIR determined that implementation of the General Plan Update would have less than significant impacts associated with implementation of local air quality plans, including the San Diego RAQS and/or applicable portions of the SIP and emission of objectionable odors. The PEIR also determined that there would be significant and unavoidable impacts associated with violation of an air quality standards; cumulatively considerable net increase in pollutants for which the SDAB is listed as non-attainment; and exposure of sensitive receptors to substantial amounts of toxic air contaminants (TACs) or hazardous air pollutants (HAPs) that would result in a potentially significant increase in cancer risk. Mitigation measures in the 2011 GPU PEIR Air-2.1 through Air-2.13, and Air 4.1 (listed below) would reduce impacts, but not below significant levels.

2011 GPU PEIR Mitigation Measures

Air-2.1 Provide incentives such as preferential parking for hybrids or alternatively fueled vehicles such as compressed natural gas (CNG) vehicles or hydrogen-powered vehicles. The County shall also establish programs for priority or free parking on County streets or in County parking lots for hybrids or alternatively fueled vehicles.

Air-2.2 Replace existing vehicles in the County fleet as needed with the cleanest vehicles commercially available that are cost-effective and meet vehicle use needs.

Air-2.3 Implement transportation fleet fueling standards to improve the number of alternatively fueled vehicles in the County fleet.

Air-2.4 Provide incentives to promote the siting or use of clean air technologies where feasible. These technologies shall include, but not be limited to, fuel cell technologies, renewable energy sources, and hydrogen fuel.

Air-2.5 Require that the following measures be implemented on all construction projects where project emissions are above the SLTs:

- Multiple applications of water during grading between dozer/scrapper passes
- Paving, chip sealing or chemical stabilization of internal roadways after completion of grading
- Use of sweepers or water trucks to remove “track-out” at any point of public street access
- Termination of grading if winds exceed 25 miles per hour
- Stabilization of dirt storage piles by chemical binders, tarps, fencing or other erosion control
- Use of low-sulfur fuels in construction equipment
- Use of low-VOC paints
- Projects exceeding SLTs will require ten percent of the construction fleet to use any combination of diesel catalytic converters, diesel oxidation catalysts, diesel particulate filters and/or CARB certified Tier I, II, III, IV equipment. Equipment is certified if it meets emission standards established by the EPA for mobile non-road diesel engines of almost all types. Standards established for hydrocarbons, oxides of nitrogen (NOX), carbon monoxide, and particulate matter. Tier I standards are for engines over 50 hp (such as bulldozers) built between 1996 and 2000, and engines under 50 hp (such as lawn tractors) built between 1999 and 2000. Tier II standards are for all engine sizes from 2001 to 2006, and Tier III standards are for engines rated over 50 hp from 2006 to 2008 (EPA 1998). Tier IV standards apply to engines of all sizes built in 2008 or later. Standards are increasingly stringent from Tier I to Tier IV (EPA 2004).

Air-2.6 Use County Guidelines for Determining Significance for Air Quality to

identify and mitigate adverse environmental effects on air quality.

- Air-2.7** Implement County Air Pollution Control District (APCD) regulations for air emissions from all sources under its jurisdiction.
- Air-2.8** Require NSRs to prevent permitting projects that are “major sources.”
- Air-2.9** Implement the Grading, Clearing, and Watercourses Ordinance by requiring all clearing and grading to be conducted with dust control measures.
- Air-2.10** Revise Board Policy F-50 to strengthen the County’s commitment and requirement to implement resource-efficient design and operations for County-funded renovation and new building projects. This could be achieved by making the guidelines within the policy mandatory rather than voluntary.
- Air-2.11** Implement County Regional Air Quality Strategy (RAQS) to attain State air quality standards for O3.
- Air-2.12** Revise Board Policy G-15 to require County facilities to comply with Silver Leadership in Energy and Environmental Design (LEED) standards or other equivalent Green Building rating systems.
- Air-2.13** Revise Board Policy G-16 to require the County to:
- Adhere to the same or higher standards it would require from the private sector when locating and designing facilities concerning environmental issues and sustainability; and
 - Require government contractors to use low emission construction vehicles and equipment.
- Air-4.1** Use the policies set forth in the CARB’s Land Use and Air Quality Handbook (CARB 2005) as a guideline for siting sensitive land uses. Implementation of this measure will ensure that sensitive land uses such as residences, schools, day care centers, playgrounds, and medical facilities are sited appropriately to minimize exposure to emissions of TACs.

An air quality analysis will be conducted to analyze the Project’s consistency with CEQA Guidelines Appendix G and County Guidelines for Determining Significance, Air Quality, such as pollutant emissions and concentrations associated with the Ordinance amendment. A brief discussion is provided below; however, this issue will be fully analyzed in the SEIR.

A. Conflict with or obstruct the implementation of the San Diego RAQS and/or applicable portions of the SIP

Supplemental Analysis Required: The Project is located within the San Diego Air Basin and is subject to the San Diego County Air Pollution Control District (SDAPCD) Guidelines and regulations. The SDAPCD is required, pursuant to the federal and state Clean Air

Acts, to reduce emissions of criteria pollutants for which the county is in non-attainment status (i.e., ozone [O₃], particulate matter 10 microns in diameter or smaller [PM₁₀], and particulate matter 2.5 microns in diameter or smaller [PM_{2.5}]). The most recent SDAPCD air quality attainment plans are the 2022 San Diego Regional Air Quality Strategy (RAQS) and the 2020 Ozone Attainment Plan. The RAQS outlines the SDAPCD's plans and control measures to attain the state air quality standards for ozone, while the relevant State Implementation Plan (SIP) document, the 2020 Ozone Attainment Plan, outlines the SDAPCD's plans and control measures for attaining federal air quality standards for ozone. Both the federal and state plans forecast future emissions and determine the strategies necessary to reduce stationary source emissions through regulatory controls. These air quality plans include all emissions sources in the county, including but not limited to stationary sources and mobile sources.

The Project would conflict with or obstruct implementation of an applicable plan if it would worsen existing air quality violations or exceed the growth projections developed by the County and San Diego Association of Governments. A project is deemed inconsistent with air quality plans if it would result in population and/or employment growth that exceeds estimates used to develop applicable air quality plans, which, in turn, would generate emissions not accounted for in the regional emissions budgets. Therefore, the Project is evaluated to determine if it is consistent with the land use designations and growth anticipated in the RAQS and Ozone Attainment Plan prepared for the San Diego region.

The County proposes to amend the Ordinance to update the clearing and grading permit process for agriculture and residential. Construction activities associated with implementation of the Ordinance Update may result in emissions that were not considered as a part of the RAQS and SIP based on growth projections. Therefore, the Ordinance Update will be evaluated further for consistency with the RAQS and SIP. This issue will be analyzed further in the SEIR.

B. Violation of any air quality standard or contribute substantially to an existing or projected air quality violation

Supplemental Analysis Required: San Diego County is currently in non-attainment status under the California Ambient Air Quality Standards for O₃, PM_{2.5}, and PM₁₀ and in non-attainment status under the National Ambient Air Quality Standards for O₃. O₃ is formed when volatile organic compounds, also referred to as reactive organic gases, and nitrogen oxides (NO_x) react in the presence of sunlight. Volatile organic compound sources include fuels (e.g., gasoline, natural gas, wood, oil), solvents, petroleum processing and storage, and pesticides. Sources of PM₁₀ and PM_{2.5} in both urban and rural areas include motor vehicles exhaust, wood-burning stoves and fireplaces, dust from construction, landfills, agriculture, wildfires, brush/waste burning, dust from paved and unpaved road travel, and windblown dust from open lands.

Implementation of the Ordinance Update would have the potential to result in construction emissions that could exceed County thresholds from agricultural and residential clearing and grading activities throughout the unincorporated County. Therefore, the Project could result in a cumulatively considerable net increase in criteria pollutants, including those for which the region is in non-attainment. This issue will be analyzed further in the SEIR.

C. Expose sensitive receptors to substantial pollutant concentrations

Supplemental Analysis Required: Air quality regulators typically define sensitive receptors as schools (preschool through 12th grade), hospitals, resident care facilities, day-care centers, or other facilities that may house individuals with health conditions who could be adversely affected by changes in air quality. The County also considers residences to be sensitive receptors because they may house children or the older adults.

Implementation of the Ordinance Update would have the potential to result in construction emissions that could adversely affect sensitive receptors. This issue will be analyzed further in the SEIR.

D. Creation of objectionable odors affecting a substantial number of people

Supplemental Analysis Required: Construction as a result of the implementation of the Ordinance Update could result in objectionable odors from the emission of diesel fumes and other odors typically associated with construction activities. If located near sensitive receptors, construction odors could affect a substantial number of people. This issue will be analyzed further in the SEIR.

IV. BIOLOGICAL RESOURCES - Since the previous EIR was certified, are there any changes in the Project, changes in circumstances under which the Project is undertaken and/or “new information of substantial importance” that cause one or more effects to biological resources including: adverse effects on any sensitive natural community (including riparian habitat) or species identified as a candidate, sensitive, or special status species in a local or regional plan, policy, or regulation, or by the California Department of Fish and Wildlife (CDFW) or U.S. Fish and Wildlife Service (USFWS); adverse effects to federally protected wetlands as defined by Section 404 of the Clean Water Act; interference with the movement of any native resident or migratory fish or wildlife species or with wildlife corridors, or impeding the use of native wildlife nursery sites; and/or conflicts with the provisions of any adopted Habitat Conservation Plan, Natural Communities Conservation Plan, or other approved local, regional or state habitat conservation plan, policies or ordinances?

YES NO

2011 San Diego County General Plan Update PEIR

The GPU PEIR determined that implementation of the General Plan Update would have a less than significant impact associated with conflict with local biological resources related policies and ordinances and/or conflicts with the provisions of any adopted Habitat Conservation Plan, Natural Communities Conservation Plan, or other approved local, regional or state habitat conservation plan, policies or ordinances. The PEIR also determined that implementation of the General Plan Update would have a potentially significant impact associated with direct impacts to federally protected wetlands as defined by Section 404 of the Clean Water Act. However, implementation of 2011 GPU PEIR mitigation (described below) would reduce impacts to less than significant.

The PEIR also determined that implementation of the General Plan Update would have significant and unavoidable impacts associated with the interference with the movement of any native resident or migratory fish or wildlife species or with wildlife corridors, or impeding the use of native wildlife nursery sites; effects on a sensitive natural community (including riparian habitat) or species identified as a candidate, sensitive, or special status species in a local or regional plan, policy, or regulation, or by the California Department of Fish and Wildlife (CDFW) or U.S. Fish and Wildlife Service (USFWS).

2011 GPU PEIR Mitigation Measures

- Bio-1.1** Create a Conservation Subdivision Program that facilitates conservation-oriented project design through changes to the Subdivision Ordinance, Resource Protection Ordinance, Zoning Ordinance, Groundwater Ordinance, and other regulations as necessary. It is intended that these changes will promote conservation of natural resources and open space while improving mechanisms for flexibility in project design so that production of housing stock is not negatively impacted. Additionally, any such allowances of flexibility must be done with consideration of community character through planning group coordination and/or findings required for project approval.
- Bio-1.2** Implement and revise existing Habitat Conservation Plans/Policies to preserve sensitive resources within a cohesive system of open space. In addition, continue preparation of MSCP Plans for North County and East County.
- Bio-1.3** Implement conservation agreements through Board Policy I-123, as this will facilitate preservation of high-value habitat in the County's MSCP Subarea Plan.
- Bio-1.4** Coordinate with nonprofit groups and other agencies to acquire preserve lands.
- Bio-1.5** Utilize County Guidelines for Determining Significance for Biological Resources to identify adverse impacts to biological resources. Also utilize the County's Geographic Information System (GIS) records and the Comprehensive Matrix of Sensitive Species to locate special status species populations on or near project sites. This information will be used to avoid or mitigate impacts as appropriate.
- Bio-1.6** Implement the RPO, BMO, and HLP Ordinance to protect wetlands, wetland buffers, sensitive habitat lands, biological resource core areas, linkages, corridors, high-value habitat areas, subregional coastal sage scrub focus areas, and populations of rare, or endangered plant or animal species.
- Bio-1.7** Minimize edge effects from development projects located near sensitive resources by implementing the County Noise Ordinance, the County Groundwater Ordinance, the County's Landscaping Regulations (currently part of the Zoning Ordinance), and the County Watershed Protection, Storm

Water Management, and Discharge Control Ordinance.

- Bio-2.1** Revise the Ordinance Relating to Water Conservation for Landscaping to incorporate appropriate plant types and regulations requiring planting of native or compatible non-native, non-invasive plant species in new development.
- Bio-2.2** Require that development projects obtain CWA Section 401/404 permits issued by the California Regional Water Quality Control Board and U.S. Army Corps of Engineers for all project-related disturbances of waters of the U.S. and/or associated wetlands. Also continue to require that projects obtain Fish and Game Code Section 1602 Streambed Alteration Agreements from the California Department of Fish and Game for all project-related disturbances of streambeds.
- Bio-2.3** Ensure that wetlands and wetland buffer areas are adequately preserved whenever feasible to maintain biological functions and values.
- Bio-2.4** Implement the Watershed Protection, Storm Water Management, and Discharge Control Ordinance to protect wetlands.

A biological resources analysis will be conducted to analyze the Project's consistency with the CEQA Guidelines Appendix G and County Guidelines for Determining Significance, Biological Resources, such as impacts to species associated with the Ordinance amendment. A brief discussion is provided below; however, this issue will be fully analyzed in the SEIR.

A. Adverse effects on any sensitive natural community (including riparian habitat) or species identified as a candidate, sensitive, or special status species in a local or regional plan, policy, or regulation, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service

Supplemental Analysis Required: The County proposes to amend the Ordinance to update the clearing and grading permit process. The unincorporated County includes chaparral, coastal sage scrub, coniferous forests, desert scrub, grasslands, marshes, riparian vegetation, and urban/disturbed land. According to the County General Plan Update EIR (County of San Diego 2011a), approximately 184 special-status plant species and 111 special-status wildlife species are in the county. There are numerous federal, state, and local regulations that protect sensitive natural communities identified in local or regional plans, policies, and regulations or by CDFW or the USFWS. However, construction activities associated with implementation of the Ordinance Update would have the potential to impact special-status plant and wildlife species. This issue will be analyzed further in the SEIR.

B. Adverse effect on 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

Supplemental Analysis Required: The Project will include, but is not limited to, changes to the grading and clearing requirements, thresholds for permit requirements, and permit process. The Project will include evaluation of providing a ministerial permit process for grading and/or clearing for housing located in VMT Efficient or Infill Areas. The unincorporated County contains riparian habitat and other sensitive natural communities. There are a number of federal, state, and local regulations in place to protect riparian habitat. The Clean Water Act (CWA) regulates certain impacts to federally protected wetlands and non-wetland waters of the U.S. The California Lake and Streambed Alteration Program (Section 1602 of the California Department of Fish and Game Code) requires written notification to the CDFW prior to altering a riparian area supported by a lake, river, or stream. On the local level, the County's Resource Protection Ordinance (RPO) restricts certain impacts to wetlands, wetland buffers, floodways, and floodplain fringe areas.

However, construction activities associated with implementation of the Ordinance Update could have the potential to impact riparian habitat or other sensitive natural communities. This issue will be analyzed further in the SEIR.

C. Adverse effects to federally protected wetlands

Supplemental Analysis Required: The County proposes to amend the Ordinance to update the clearing and grading permit process. According to the County General Plan Update EIR (County of San Diego 2011a), approximately 1,841 acres of federally defined wetlands are in the unincorporated County. The CWA regulates certain impacts to federally protected wetlands as well as non-wetland waters of the U.S. However, construction activities associated with implementation of the Ordinance Update may impact state or federally protected wetlands. This issue will be analyzed further in the SEIR.

D. Interfere with the movement of any native resident or migratory fish or wildlife species or with wildlife corridors, or impeding the use of native wildlife nursery sites

Supplemental Analysis Required: Direct impacts on wildlife movement corridors generally occur from blockages or interference with the connectivity between blocks of habitat, a decrease in the width of a corridor or linkage that constrains movement, or the loss of visual continuity within a linkage or corridor. Nursery sites, which are located throughout the unincorporated County, include areas that provide the resources necessary for reproduction of a species, including foraging habitat, breeding habitat, and water sources. A system of corridors and linkages has been established in the southwestern portion of the unincorporated County through the South County Plan and proposed in the northern unincorporated County through the Draft North County Plan. No core areas or linkages have been adopted or proposed in the eastern portion of the unincorporated County (County of San Diego 2011a). Construction activities associated with implementation of the Ordinance Update could have the potential to impact

established wildlife corridors in the unincorporated County. This issue will be analyzed further in the SEIR.

E. Conflict with other local policies or ordinances protecting biological resources such as a tree preservation policy or ordinance

Supplemental Analysis Required: The protection of biological resources in the county is outlined in the MSCP, RPO, Biological Mitigation Ordinance, and Habitat Loss Permit Ordinance. Construction activities that occur under the Ordinance Update would be located within the boundaries of these ordinances. Therefore, the Project has the potential to conflict with local policies or ordinances protecting biological resources. This issue will be analyzed further in the SEIR.

F. Conflict with the provisions of any adopted Habitat Conservation Plan, Natural Communities Conservation Plan, or other approved local, regional or state habitat conservation plan, policies or ordinances

Supplemental Analysis Required: The County has a number of conservation plans in place, including the MSCP (combined Habitat Conservation Plan and Natural Community Conservation Plan), the Coastal Sage Scrub Natural Community Conservation Plan Process Guidelines, and the Biological Mitigation Ordinance, which implements the South County Plan. Implementation of the Project would occur within the boundaries of these conservation plans. Therefore, the Project has the potential to conflict with local, regional, and state plans, policies, and ordinances. This issue will be analyzed further in the SEIR.

V. CULTURAL RESOURCES - Since the previous EIR was certified, are there any changes in the Project, changes in circumstances under which the Project is undertaken and/or “new information of substantial importance” that cause one or more effects to cultural resources including: causing a change in the significance of a historical or archaeological resource as defined in State CEQA Guidelines Section 15064.5; destroying a unique paleontological resource or site or unique geologic feature; and/or disturbing any human remains, including those interred outside of formal cemeteries?

YES NO

2011 San Diego County General Plan Update PEIR

The GPU PEIR determined that implementation of the General Plan Update would have a potentially significant impact associated substantial adverse changes to the significance of historical resources; substantial adverse change in the significance of an archaeological resource, including the destruction or disturbance of an archaeological site that contains or has the potential to contain information important to history or prehistory; adverse impacts to paleontological resources; and/or disturbance of human remains. However, all potentially significant impacts would be reduced to a less than significant level with implementation of mitigation, described below.

2011 GPU PEIR Mitigation Measures

- Cul-1.1** Utilize the RPO, CEQA, the Grading and Clearing Ordinance, and the Zoning Ordinance to identify and protect important historic and archaeological resources by requiring appropriate reviews and applying mitigation when impacts are significant.
- Cul-1.2** Provide incentives through the Mills Act to encourage the restoration, renovation, or adaptive reuse of historic resources.
- Cul-1.3** Initiate a new effort to identify and catalog historic and potentially historic resources within unincorporated San Diego County. This process will require public participation and evaluation by County staff and the Historic Site Board. The anticipated result of this effort is: 1) at minimum, landowners will be better informed of potential resources on their properties as well as the options available to them under the State/National Register or the Mills Act; and 2) in some cases, properties may be zoned with a special area designator for historic resources, thereby restricting demolition/removal and requiring a Site Plan permit for proposed construction which will be reviewed by the Historic Site Board.
- Cul-1.4** Support the Historic Site Board in their efforts to provide oversight for historic resources.
- Cul-1.5** Ensure landmarking and historical listing of County owned historic sites.
- Cul-1.6** Implement, and update as necessary, the County's Guidelines for Determining Significance for Cultural Resources to identify and minimize adverse impacts to historic and archaeological resources.
- Cul-1.7** Identify potentially historic structures within the County and enter the information in the Department of Planning and Land Use property database. Identification will occur by compiling information from all available sources (e.g., County surveys, Historic Site Board, information received from SOHO and community planning groups, information from other jurisdictions, etc.) and shall be updated at least every five years.
- Cul-1.8** Revise the Resource Protection Ordinance (RPO) to apply to the demolition or alteration of identified significant historic structures.
- Cul-2.1** Develop management and restoration plans for identified and acquired properties with cultural resources.
- Cul-2.2** Facilitate the identification and acquisition of important resources through collaboration with agencies, tribes, and institutions, such as the South Coast Information Center (SCIC), while maintaining the confidentiality of sensitive cultural information.
- Cul-2.3** Support the dedication of easements that protect important cultural resources by using a variety of funding methods, such as grant or matching funds, or funds from private organizations.

- Cul-2.4** Protect significant cultural resources through regional coordination and consultation with the NAHC and local tribal governments, including SB-18 review.
- Cul-2.5** Protect undiscovered subsurface archaeological resources by requiring grading monitoring by a qualified archaeologist and a Native American monitor for ground disturbing activities in the vicinity of known archaeological resources, and also, when feasible, during initial surveys.
- Cul-2.6** Protect significant cultural resources by facilitating the identification and acquisition of important resources through regional coordination with agencies, and institutions, such as the South Coast Information Center (SCIC) and consultation with the Native American Heritage Commission (NAHC) and local tribal governments, including SB-18 review, while maintaining the confidentiality of sensitive cultural information.
- Cul-3.1** Implement the Grading Ordinance and CEQA to minimize impacts to paleontological resources, require a paleontological resources monitor during grading when appropriate, and apply appropriate mitigation when impacts are significant.
- Cul-3.2** Implement, and update as necessary, the County's Guidelines for Determining Significance for Paleontological Resources to identify and minimize adverse impacts to paleontological resources.
- Cul-4.1** Include regulations and procedures for discovery of human remains in all land disturbance and archaeological-related programs. Ensure that all references to discovery of human remains promote preservation and include proper handling and coordination with Native American groups. Apply appropriate mitigation when impacts are significant.

A cultural resources analysis will be conducted to analyze the Project's consistency with the CEQA Guidelines Appendix G and County Guidelines for Determining Significance, Cultural Resources: Archaeological and Historic Resources for cultural and tribal cultural resources, such as potential historical, archaeological, or tribal cultural resources impacts associated with the Ordinance amendment. A brief discussion is provided below; however, this issue will be fully analyzed in the SEIR.

A. Cause a change in the significance of a historical or archaeological resource as defined by Section 15064.5

Supplemental Analysis Required: The unincorporated county contains historical sites that are designated on local, state, and national historical lists and meets the definitions of historical resources under Section 15064.5(a) of the CEQA Guidelines or the County's RPO (County of San Diego 2012). The Project will include, but is not limited to, changes to the grading and clearing requirements, thresholds for permit requirements, and permit process. The Project will include evaluation of providing a ministerial permit process for grading and/or clearing for housing located in VMT Efficient or Infill Areas. Construction activities as a result of project implementation could include alteration of a significant

historical resource. Further, alteration of buildings that were constructed over 50 years ago would require discretionary actions under CEQA and further investigation for permit approval. Future development would be required to comply with the RPO, which requires the evaluation of cultural resources and prohibits development, trenching, grading, clearing, and grubbing, or any other activity or use damaging to significant prehistoric or historic site lands (County of San Diego Code of Regulatory Ordinances, Sections 86.601–86.608). Implementation of the Project may result in a significant impact on a historical resource as defined in CEQA Guidelines, Section 15064.5. This issue will be analyzed further in the SEIR.

B. Cause a substantial adverse change in the significance of an archaeological resource pursuant to 15064.5

Supplemental Analysis Required: Construction activities as a result of the Ordinance Update could result in a substantial adverse change in the significance of an archaeological resource, including destruction or disturbance of an important archaeological site or any portion of an important archaeological site that contains or has the potential to contain information important to history or prehistory. Ground-disturbing activities, such as clearing, excavation, and grading, that could occur have the potential to damage or destroy archaeological resources that may be present on or below the ground surface, particularly in areas that have not previously been developed. Future construction associated with implementation of the Project could cause a substantial change in the significance of an archaeological resource, per CEQA Guidelines, Section 15064.5. This issue will be analyzed further in the SEIR.

C. Disturb any human remains, including those interred outside of formal cemeteries

Supplemental Analysis Required: Archaeological materials, including human burials, have been found throughout the unincorporated county. Human burials have occurred outside formal cemeteries, usually associated with archaeological resource sites and prehistoric peoples. Therefore, areas with known archaeological resources sites may have a higher risk for containing human remains. The location of most of these sites is kept confidential in order to protect these resources; however, resources throughout the county include remains left by local Native Americans and other early inhabitants. Construction activities associated with implementation of the Ordinance Update would have the potential to disturb unknown human remains and/or burial sites. This issue will be analyzed further in the SEIR.

VI. ENERGY - Since the previous EIR was certified, are there any changes in the Project, changes in circumstances under which the Project is undertaken and/or “new information of substantial importance” that cause one or more effects to energy including: resulting in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during Project construction or operation, and/or conflicts with or obstruct a state or local plan for renewable energy or energy efficiency?

YES NO

2011 San Diego County General Plan Update PEIR

“Energy” was not an environmental impact area considered by the GPU PEIR because under the CEQA regulations at the time, this impact category was not required. However, the PEIR did consider energy under the category Utilities and Service Systems. Refer to XIX. Utilities and Service Systems, below.

A. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation

Supplemental Analysis Required: The Project will include, but is not limited to, changes to the grading and clearing requirements, thresholds for permit requirements, and permit process. The Project will include evaluation of providing a ministerial permit process for grading and/or clearing for housing located in VMT Efficient or Infill Areas. Construction activities associated with the implementation of the Ordinance Update would result in the use of electricity, natural gas, petroleum, and other consumption of energy resources. Because the amount of energy anticipated to be used during construction of the Project is not known at this time, the Project could have a potentially significant impact due to wasteful, inefficient, or unnecessary consumption of energy resources. This issue will be analyzed further in the SEIR.

B. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency

Supplemental Analysis Required: 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 VMT. Nonetheless, because the amount of energy anticipated to be used during construction of the Project is unknown, it could conflict with or obstruct a state or local plan for renewable energy and/or energy efficiency. This issue will be analyzed further in the SEIR.

VII. GEOLOGY AND SOILS - Since the previous EIR was certified, are there any changes in the Project, changes in circumstances under which the Project is undertaken and/or “new information of substantial importance” that result in one or more effects from geology and soils including: exposure of people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, seismic-related ground failure, including liquefaction, strong seismic ground shaking, or landslides; result in substantial soil erosion or the loss of topsoil; produce unstable geological conditions that will result in adverse impacts resulting from landslides, lateral spreading, subsidence, liquefaction or collapse; being located on expansive soil creating substantial risks to life or property; and/or having 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?

YES NO

2011 San Diego County General Plan Update PEIR

The GPU PEIR determined that implementation of the General Plan Update would have a less than significant impact associated with seismic-related hazards such as seismically induced ground shaking, liquefaction, and landslides; contribution to soil erosion or topsoil loss; on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse; creation of substantial risks to life or property due to expansive soils; development in areas where soils are incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems; and materially impairing a unique geologic feature by destroying or altering the physical characteristics that convey the uniqueness of the resource. No mitigation was designated for this topic.

A. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

- i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault. Refer to Division of Mines and Geology Special Publication 42**

Supplemental Analysis Required: According the County GPU PEIR (County of San Diego 2011a), the Alquist-Priolo Earthquake Faulting Zoning Act has designated active faults in the unincorporated portion of the San Diego County to include Elsinore Fault: North of Pala, Palomar Mountain, Pauma Valley, Lake Henshaw, Julian, Banner Canyon, Mason Valley, Vallecito Valley, and Carrizo Valley; Earthquake Valley Fault: San Felipe Valley and Sentenac Canyon; and San Jacinto Zone – Coyote Creek Fault: Borrego Valley and Ocotillo Wells. Additionally, many of the county’s faults are classified as potentially active or inactive.

The Project will include, but is not limited to, changes to the grading and clearing requirements, thresholds for permit requirements, and permit process. The Project will include evaluation of providing a ministerial permit process for grading and/or clearing for housing located in VMT Efficient or Infill Areas. Ground-disturbing activities, such as clearing, excavation, and grading, that could occur as a result of implementation of the Ordinance Update could directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including rupture of a known earthquake fault. This issue will be analyzed further in the SEIR.

- ii) Strong seismic ground shaking**

Supplemental Analysis Required: Ground shaking is responsible for the majority of damage from earthquakes. The intensity of shaking depends on the type of fault, distance to the epicenter, magnitude of the earthquake, and subsurface geology. The Project would amend the Ordinance to update the clearing and grading permit process.

Ground-disturbing activities, such as clearing, excavation, and grading, that could occur as a result of implementation of the Ordinance Update could directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including strong seismic ground shaking. This issue will be analyzed further in the SEIR.

iii) Seismic-related ground failure, including liquefaction

Supplemental Analysis Required: Liquefaction occurs primarily in saturated, loose, fine to medium-grained soils in areas where the groundwater table is generally 50 feet or less below the surface. When these sediments are shaken during an earthquake, a sudden increase in pore water pressure causes the soils to lose strength and behave as a liquid. Portions of the unincorporated County would be susceptible to liquefaction from ground shaking during larger seismic events in areas with loose sandy soils combined with a shallow groundwater table, which typically are located in alluvial river valleys/basins and floodplains. The Project would amend the Ordinance to update the clearing and grading permit process. Ground-disturbing activities, such as clearing, excavation, and grading that could occur as a result of implementation of the Ordinance Update could directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction. This issue will be analyzed further in the SEIR.

iv) Landslides

Supplemental Analysis Required: The Project will include, but is not limited to, changes to the grading and clearing requirements, thresholds for permit requirements, and permit process. The Project will include evaluation of providing a ministerial permit process for grading and/or clearing for housing located in VMT Efficient or Infill Areas. Ground-disturbing activities, such as clearing, excavation, and grading, that could occur as a result of implementation of the Ordinance Update could occur in areas prone to potential landslide activity, which could result in potentially substantial adverse effects including risk of loss, injury, or death. This issue will be analyzed further in the SEIR.

B. Result in substantial soil erosion or the loss of topsoil

Supplemental Analysis Required: The Project would amend the Ordinance to update the clearing and grading permit process. Construction activities would expose and disturb soils and, therefore, would increase the potential of soil erosion or the loss of topsoil. This issue will be analyzed further in the SEIR.

C. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in an on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse

Supplemental Analysis Required: The Project will include, but is not limited to, changes to the grading and clearing requirements, thresholds for permit requirements, and permit process. The Project will include evaluation of providing a ministerial permit process for grading and/or clearing for housing located in VMT Efficient or Infill Areas. Construction activities would involve site grading that could occur on unstable soils. Therefore, the

Project could potentially result in an on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse as a result of unstable soils. This issue will be analyzed further in the SEIR.

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

Supplemental Analysis Required: Certain types of clay soils expand when they are saturated and shrink when dried. These are called expansive soil and can pose a threat to the integrity of structures built on them without proper engineering. Expansive soils are derived primarily from weathering of feldspar minerals and volcanic ash. According to the County GPU PEIR (County of San Diego 2011a), highly expansive soils in the county occur predominately in the coastal plains, on areas of dissected marine terraces and uplands. They can also be found in valleys and on slopes in the foothills and mountains of the Peninsular Ranges region and, to a lesser extent, in the desert. In the foothills, soils having a high expansion potential occur near Ramona, Escondido, Rainbow, and areas northeast of Vista. Other areas having high shrink-swell soils are Guatay and Pine Valley. The Project would amend the Ordinance to update the clearing and grading permit process. Construction activities would involve site grading that could occur on expansive soils. This issue will be analyzed further in the SEIR.

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 waste water

Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR: The unincorporated communities of San Diego include areas that are in sewer service areas and areas that are required to use on-site wastewater disposal treatment systems, including individual septic systems to meet wastewater demands. The Project would amend the Ordinance to update the clearing and grading permit process. The Project would not require use of septic or alternative wastewater disposal systems and, therefore, would not result in a significant impact. Impacts would be less than significant. This issue will not be analyzed further in the SEIR.

F. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature

Supplemental Analysis Required: Based on the geologic formations in the county, levels of paleontological resource potential and sensitivity have been developed (Deméré and Walsh 1993) and are identified in the County of San Diego Guidelines for Determining Significance Paleontological Resources (2009). Sensitivity levels are rated for individual geologic formations, as it is the formation that contains the fossil remains. The sensitivity levels are the same as the resource potential ratings and include high, moderate, low, marginal, and no potential. The Project will include, but is not limited to, changes to the grading and clearing requirements, thresholds for permit requirements, and permit process. The Project will include evaluation of providing a ministerial permit process for grading and/or clearing for housing located in VMT Efficient or Infill Areas. Construction

activities would involve site grading and excavation that could occur in areas of high and moderate sensitivity, which could potentially directly or indirectly destroy a unique paleontological resource or site or unique geological features. This issue will be analyzed further in the SEIR.

VIII. GREENHOUSE GAS EMISSIONS - Since the previous EIR was certified, are there any changes in the Project, changes in circumstances under which the Project is undertaken and/or “new information of substantial importance” that result in one or more effects related to environmental effects associated with greenhouse gas emissions or compliance with applicable plans, policies or regulations adopted for the purpose of reducing greenhouse gas (GHG) emissions?

YES NO

2011 San Diego County General Plan Update PEIR

The GPU PEIR determined that the Project would have potentially significant impacts associated with compliance with AB 32, and effects on water supply, wildfires, energy needs, and public health. Mitigation measures (described below) would reduce impacts to less than significant levels.

2011 GPU PEIR Mitigation Measures

- CC-1.1** Update the County Green Building Program to increase effectiveness of encouraging incentives for development that is energy efficient and conserves resources through incentives and education.

- CC-1.2** Prepare a County Climate Change Action Plan with an updated baseline inventory of greenhouse gas emissions from all sources, more detailed greenhouse gas emissions reduction targets and deadlines; and a comprehensive and enforceable GHG emissions reduction measures that will achieve a 17% reduction in emissions from County operations from 2006 by 2020 and a 9% reduction in community emissions between 2006 and 2020. Once prepared, implementation of the plan will be monitored and progress reported on a regular basis.

- CC-1.3** Work with SANDAG to achieve regional goals in reducing GHG emissions associated with land use and transportation.

- CC-1.4** Review traffic operations to implement measures that improve flow and reduce idling such as improving traffic signal synchronization and decreasing stop rate and time.

- CC-1.5** Coordinate with the San Diego County Water Authority and other water agencies to better link land use planning with water supply planning with specific regard to potential impacts from climate change and continued implementation and enhancement of water conservation programs to

reduce demand. Also support water conservation pricing (e.g., tiered rate structures) to encourage efficient water use.

- CC-1.6** Implement and expand County-wide recycling and composting programs for residents and businesses. Require commercial and industrial recycling.
- CC-1.7** Incorporate the California ARB's recommendations for a climate change CEQA threshold into the County Guidelines for Determining Significance for Climate Change. These recommendations will include energy, waste, water, and transportation performance measures for new discretionary projects in order to reduce GHG emissions. Should the recommendation not be released in a timely manner, the County will prepare its own threshold.
- CC-1.8** Revise County Guidelines for Determining Significance based on the Climate Change Action Plan. The revisions will include guidance for proposed discretionary projects to achieve greater energy, water, waste, and transportation efficiency.
- CC-1.9** Coordinate with APCD, SDG&E, and the California Center for Sustainable Energy to research and possibly develop a mitigation credit program. Under this program, mitigation funds will be used to retrofit existing buildings for energy efficiency to reduce GHG emissions.
- CC-1.10** Continue to implement the County Groundwater Ordinance, Watershed Protection Ordinance (WPO), Resource Protection Ordinance (RPO), MSCP and prepare MSCP Plans for North and East County in order to further preserve wildlife habitat and corridors, wetlands, watersheds, groundwater recharge areas and other open space that provide carbon sequestration benefits and to restrict the use of water for cleaning outdoor surfaces and vehicles. The WPO also implements low-impact development practices that maintain the existing hydrologic character of the site to manage storm water and protect the environment. (Retaining storm water runoff on-site can drastically reduce the need for energy-intensive imported water at the site.)
- CC-1.11** Revise the Ordinance Relating to Water Conservation for Landscaping to further water conservation to:
- Create water-efficient landscapes and use water-efficient irrigation systems and devices, such as soil moisture-based irrigation controls.
 - Use reclaimed water for landscape irrigation.
 - Restrict watering methods (e.g., prohibit systems that apply water to nonvegetated surfaces) and control runoff.
 - • Provide education about water conservation and available

programs and incentives.

- CC-1.12** Continue to coordinate with resource agencies, CALFIRE, and fire districts to minimize potential wildfire risks in the County and to plan for the potential increase in future risk that may result from Climate Change.
- CC-1.13** Continue to implement and revise as necessary the Regional Trails Plan as well as the Community Trails Master Plan to connect parks and publicly accessible open space through shared pedestrian/bike paths and trails to encourage walking and bicycling.
- CC-1.14** Provide public education and information about options for reducing greenhouse gas emissions. In addition to addressing land development, education should also address purchasing, conservation, and recycling.
- CC-1.15** Reduce VMT and encourage alternative modes of transportation by implementing the following measures:
- During Community Plan updates, establish policies and design guidelines that: encourage commercial centers in compact walkable configurations and discourage “strip” commercial development
 - Expand community bicycle infrastructure.
 - Revise the Off-Street Parking Design Manual to include parking placement concepts that encourage pedestrian activity and concepts for providing shared parking facilities.
 - Establish comprehensive planning principles for transit nodes such as the Sprinter Station located in North County Metro.
 - Continue to locate County facilities near transit facilities whenever feasible.
 - Coordinate with SANDAG, Caltrans, and tribal governments to maximize opportunities to locate park and ride facilities.
 - Continue to coordinate with SANDAG, Caltrans, and transit agencies to expand the mass transit opportunities in the unincorporated county and to review the location and design of transit stops. Establish a DPLU transit coordinator to ensure land use issues are being addressed.
 - Update the Zoning Ordinance to require commercial, office, and industrial development to provide preferred parking for carpools, vanpools, electric vehicles, and flex cars.
- CC-1.16** Develop and implement a Strategic Energy Plan to increase energy

efficiency in existing County buildings and set standards for any new County facilities that will ultimately reduce GHG emissions. This will include implementation of the following measures as will be detailed within the Plan:

- Improve energy efficiency within existing operations through retrofit projects, updated purchasing policies, updated maintenance/operations standards, and education.
- Improve energy efficiency of new construction and major renovations by applying design criteria and participating in incentive programs.
- Provide energy in a reliable and cost-effective manner and utilize renewable energy systems where feasible.
- Monitor and reduce energy demand through metering, building controls, and energy monitoring systems.
- Increase County fleet fuel efficiency by acquiring more hybrid vehicles, using alternative fuels, and by maintaining performance standards for all fleet vehicles.

CC-1.17 Develop and implement a County Operations Recycling Program. This will include implementation of the following measures as will be detailed within the Program:

- Reuse and recycle construction and demolition waste (including, but not limited to, soil, vegetation, concrete, lumber, metal, and cardboard).
- Provide interior and exterior storage areas for recyclables and green waste and adequate recycling containers located in public areas.
- Recover by-product methane to generate electricity.
- Provide education and publicity about reducing waste and available recycling services.

CC-1.18 Develop and implement a County Operations Water Conservation Program.

CC-1.19 Revise the Zoning Ordinance to facilitate recycling salvaged concrete, asphalt, and rock.

A greenhouse gas (GHG) analysis will be conducted to analyze the Project's consistency with CEQA Guidelines Appendix G, such as GHG emissions associated with the Ordinance Update. A brief discussion is provided below; however, this issue will be fully analyzed in the SEIR. At the time of this NOP, the County has not adopted the Climate

Action Plan (CAP) Update and currently does not have adopted Guidelines for Determining Significance for GHG.

A. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment

Supplemental Analysis Required: GHG emissions result in an increase in the earth's average surface temperature commonly referred to as global warming. This rise in global temperature is associated with long-term changes in precipitation, temperature, wind patterns, and other elements of the earth's climate system, known as climate change. These changes are now broadly attributed to GHG emissions, particularly those emissions that result from the human production and use of fossil fuels. GHGs include carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), and fluorinated gases. Human-induced GHG emissions are a result of energy production and consumption and personal vehicle use, among other sources. Climate changes resulting from GHG emissions could produce an array of adverse environmental impacts, including water supply shortages, severe drought, increased flooding, sea-level rise, air pollution from increased formation of ground level ozone and particulate matter, ecosystem changes, increased wildfire risk, agricultural impacts, and ocean and terrestrial species impacts, among other adverse effects.

Implementation of the Project would have the potential to generate GHG emissions from construction. This issue will be analyzed further in the SEIR.

B. Conflict with an applicable plan, policy, or regulation that was adopted for the purpose of reducing the emissions of greenhouse gases

Supplemental Analysis Required: The Project would generate GHG emissions from construction. Therefore, further analysis is required to assess potential conflicts with any applicable plan, policy, or regulation for the purpose of reducing the emissions of GHG emissions. This issue will be analyzed further in the SEIR.

IX. HAZARDS AND HAZARDOUS MATERIALS - Since the previous EIR was certified, are there any changes in the Project, changes in circumstances under which the Project is undertaken and/or "new information of substantial importance" that result in one or more effects from hazards and hazardous materials including: creation of a significant hazard to the public or the environment through the routine transport, storage, use, or disposal of hazardous materials or wastes; creation of a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment; production of hazardous emissions or handling hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school; location on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 creating a hazard to the public or the environment; location 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; within the vicinity of a private airstrip resulting in a safety hazard for people residing or working in the Project area; impair implementation of or physically interfere with an adopted emergency response plan or emergency

evacuation plan; and/or exposure of 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?

YES NO

2011 San Diego County General Plan Update PEIR

The GPU PEIR determined that implementation of the General Plan Update would have less than significant impacts associated with an increase in the transportation, use and disposal of hazardous materials from an increase in land uses that commonly store, use, and dispose of hazardous materials, such as limited impact industrial, medium impact industrial, and high impact industrial development; increase in storage, use, and disposal of hazardous materials; location of hazardous materials within a one-quarter mile of an existing or proposed school or daycare; development in the vicinity or on hazardous materials sites, or within the vicinity of public or private airports; impairment of emergency response and evacuation plans; and potential to increase human exposure to vectors.

The PEIR also determined that implementation of the General Plan Update would have significant and unavoidable impacts associated with development in areas prone to wildland fires. Mitigation measures (described below) would reduce impacts associated with development in areas prone to wildland fires, but not to less than significant levels.

2011 GPU PEIR Mitigation Measures

- Haz-1.1** Implement the Guidelines for Determining Significance, Airport Hazards, when reviewing new development projects to ensure compatibility with surrounding airports and land uses and apply appropriate mitigation when impacts are significant.

- Haz-1.2** Participate in the development of ALUCPs and future revisions to the ALUCPs to ensure the compatibility of land uses and airport operations.

- Haz-1.3** Review the AICUZ when reviewing new development projects within the study area. Ensure that such development projects are consistent with the land use compatibility and safety policies therein.

- Haz-1.4** Facilitate coordination between DPW and DPLU staff when planning new airports or operational changes to existing airports when those changes would produce new or modified airport hazard zones.

- Haz-1.5** Coordinate with the San Diego County Regional Airport Authority (SDCRAA) and County Airports for issues related to airport planning and operations.

- Haz-2.1** Implement and revise as necessary the Zoning Ordinance requiring MUPs for private airports and heliports.

- Haz-3.1** Facilitate coordination between DPLU and the Office of Emergency services to implement and periodically update the Hazard Mitigation Plan.
- Haz-3.2** Implement the CEQA Guidelines for Determining Significance to ensure that discretionary projects do not adversely impact emergency response or evacuation plans. Also implement the County Public Road Standards and County Private Road Standards during these reviews and ensure that road improvements are consistent with Emergency Response and Evacuation Plans. Apply appropriate mitigation when impacts are significant.
- Haz-3.3** Prepare Fire Access Road network plans and include in Community Plans or other document as appropriate. Also implement the County Fire Code and require fire apparatus access roads and secondary access for projects.
- Haz-4.1** Identify and minimize potential fire hazards for future development by using and maintaining a database that identifies fire prone areas, locating development away from Fire Hazard areas whenever practicable, and adhering to the County Guidelines for Determining Significance for Wildland Fires & Fire Protection and applying appropriate mitigation when impacts are significant.
- Haz-4.2** Conduct effective and environmentally sensitive brush management measures such as: addressing habitat-specific fire controls within Resource Management Plans; implementation of the Weed Abatement Ordinance and enforcing proper techniques for maintaining defensible space around structures; coordination with the local FAHJ to ensure that district goals for fuel management and fire protection are being met; and recognizing the Memorandum of Understanding between the wildlife agencies and fire authorities that guides the abatement of flammable vegetation without violating environmental regulations for habitat protection.
- Haz-4.3** Enforce and comply with Building and Fire Code to ensure there are adequate fire service levels; and require site and/or building designs that incorporate features that reduce fire hazards. Also implement the General Plan Regional Category map and Land Use Maps, which typically show lower densities in wildland areas.
- Haz-4.4** Create a Conservation Subdivision Program that facilitates conservation-oriented, fire-safe, project design through changes to the Subdivision Ordinance, Resource Protection Ordinance, Zoning Ordinance, Groundwater Ordinance, and other regulations as necessary.

A. Creation of a significant hazard to the public or the environment through the routine transport, storage, use, or disposal of hazardous materials

Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR: The Project will include, but is not limited to, changes to the grading and clearing requirements, thresholds for permit requirements, and permit process. The Project will include evaluation of providing a ministerial permit process for

grading and/or clearing for housing located in VMT Efficient or Infill Areas. Construction activities associated with implementation of the Ordinance Update would involve heavy pieces of machinery that use diesel fuels, oils and lubricants, grease, and solvents that could result in a significant hazard to the public or the environment, or an upset or accident if not stored or disposed of properly. The Project would be required to comply with federal, state, and local regulations for the routine transport, use, and disposal of any hazardous materials. These regulations include the Resource Conservation and Recovery Act, U.S. Department of Transportation Hazardous Materials Regulations (CFR 49), California Health and Safety Code, and San Diego County Code, Title 6, Division 8, in combination with construction best management practices that would be implemented during project construction. Any accidental release of these materials due to spills or leaks would be cleaned up in the normal course of business, consistent with the previously mentioned regulations. Compliance with regulations would reduce impacts to a less than significant level. This issue will not be analyzed further in the SEIR.

B. Creation of a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment

Supplemental Analysis Required: The County would amend the Ordinance to update the clearing and grading permit process. Construction activities associated with the implementation of the Ordinance Update could occur in areas of known hazardous waste sites. Therefore, there is a potential to encounter contaminated soils and groundwater during excavation activities that would result in an accidental release of hazardous materials. In addition, during construction activities, unreported contaminated soils and groundwater could be encountered. Encountered contaminated materials may be classified as a hazardous waste, a designated waste, or a special waste, depending on the type and degree of contamination. If hazardous substances are encountered during construction, and if materials are improperly managed or disposed, workers and the public could be potentially exposed to contaminated materials through accidental release. This issue will be analyzed further in the SEIR.

C. Emission of hazardous emissions or handling hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school

Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR: Potentially toxic substances, such as fuels, oils, and lubricants, would be used during construction activities associated with the implementation of the Ordinance Update. These materials would generally be used for excavation equipment, generators, and other construction equipment and would be contained in vessels engineered for safe storage. Compliance with applicable local, state, and federal regulations governing the transport, use, and storage of hazardous materials would ensure that schools within 0.25 mile of the future grading and clearing sites are not exposed to any risks related to hazardous materials during construction activities. Impacts would be less than significant. This issue will not be analyzed further in the SEIR.

D. Location on a site which is included on a list of hazardous materials sites

compiled pursuant to Government Code Section 65962.5 creating a hazard to the public or the environment

Supplemental Analysis Required: The Hazardous Waste and Substances Sites (Cortese) List is a planning document used by the state, local agencies, and developers to comply with CEQA requirements to provide information about the location of hazardous materials release sites. Numerous known contaminated sites occur throughout the county, and there are likely many more that have not yet been recorded. As a result, there is a potential for construction activities associated with implementation of the Ordinance Update to be located on or adjacent to a contaminated site, which could create a significant hazard to the public or the environment. This issue will be analyzed further in the SEIR.

E. Safety hazard or excessive noise for people residing or working in the project area 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

Supplemental Analysis Required: Seven airports are located in the unincorporated county: Agua Caliente Springs Airport, Borrego Valley Airport, Fallbrook Airpark, Gillespie Field, Jacumba Airport, Ocotillo Airport, and Ramona Airport. The Project will include, but is not limited to, changes to the grading and clearing requirements, thresholds for permit requirements, and permit process. The Project will include evaluation of providing a ministerial permit process for grading and/or clearing for housing located in VMT Efficient or Infill Areas. Implementation of the Project may result in construction activities that could occur within an airport's 60-decibel (dB) contour lines, which is the established threshold for which noise compatibility standards apply. Projects located outside the 60 dB contour are not subject to noise compatibility policies and standards of the airports' specific Airport Land Use Compatibility Plan. Construction in these areas could result in a safety hazard or excessive noise for people working on the Project site. This issue will be analyzed further in the SEIR.

F. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan

Supplemental Analysis Required: During construction, temporary full or partial lane closures may be necessary. The full or partial lane closures could result in the redistribution of traffic along adjacent and surrounding roadways. As construction progresses, access for emergency vehicles could be impaired as result of reduced roadway widths (or capacity) and increased volumes of construction-related traffic or redistributed traffic. As a result, construction could impair or physically interfere with adopted emergency response plans or evacuation plans. This issue will be analyzed further in the SEIR.

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 residents are intermixed with wildlands

Supplemental Analysis Required: Portions of the unincorporated County are in Very High Fire Hazard Safety Zones mapped by the California Department of Forestry and Fire Protection (CAL FIRE 2022). The Project is an amendment to the Ordinance to update the clearing and grading permit process to address agricultural and residential clearing and grading requirements in the unincorporated county. Construction activities associated with the implementation of the Ordinance Update could be constructed on or adjacent to undeveloped sites and potentially flammable materials, such as brush, grass, or trees, which could pose a risk of wildland fires during construction. This issue will be analyzed further in the SEIR.

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

Supplemental Analysis Required: The Project is an amendment to the Ordinance to update the clearing and grading permit process. Construction activities associated with the implementation of the Ordinance Update could result in the creation of sources of standing water that could persist for more than 72 hours. This could substantially increase human exposure to vectors, such as mosquitoes, that are capable of transmitting potentially significant public health diseases or creating nuisances. This issue will be analyzed further in the SEIR.

X. HYDROLOGY AND WATER QUALITY - Since the previous EIR was certified, are there any changes in the Project, changes in circumstances under which the Project is undertaken and/or “new information of substantial importance” that cause one or more effects to hydrology and water quality including: violation of any waste discharge requirements; an increase in any listed pollutant to an impaired water body listed under section 303(d) of the Clean Water Act; cause or contribute to an exceedance of applicable surface or groundwater receiving water quality objectives or degradation of beneficial uses; 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; substantially alter the existing drainage pattern of the site or area in a manner which would result in substantial erosion, siltation or flooding on- or off-site; create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems; provide substantial additional sources of polluted runoff; place housing or other structures which would impede or redirect flood flows 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; expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam; and/or inundation by seiche, tsunami, or mudflow?

YES NO

2011 San Diego County General Plan Update PEIR

The GPU PEIR determined that implementation of the General Plan Update would have potentially significant impacts associated with increased runoff that has the potential to cause new erosion or worsen existing erosion problems; conversion of permeable surfaces to impermeable surfaces, which have the potential to result in flooding on or off site; exceedance of the capacity of existing stormwater drainage facilities; housing within a flood hazard area; impeding or redirecting flood flows; dam inundation and flood hazards; and exposure of people or structures to damage in the event of a mudflow, seiche, or tsunami. However, implementation of mitigation (described below) would reduce impacts to less than significant levels.

The PEIR also determined that implementation of the General Plan Update would have significant and unavoidable impacts associated with surface water quality and groundwater quality, and groundwater supply and recharge.

2011 GPU PEIR Mitigation Measures

- Hyd-1.1** Update and implement the County of San Diego’s Jurisdictional Urban Runoff Management Program (JURMP).

- Hyd-1.2** Implement and revise as necessary the Watershed Protection Ordinance to reduce the adverse effects of polluted runoff discharges on waters and to encourage the removal of invasive species and restore natural drainage systems.

- Hyd-1.3** Establish and implement LID standards for new development to minimize runoff and maximize infiltration.

- Hyd-1.4** Revise and implement the Stormwater Standards Manual requiring appropriate measures for land use with a high potential to contaminate surface water or groundwater resources.

- Hyd-1.5** Utilize the County Guidelines for Determining Significance for Surface Water Quality, Hydrology, and Groundwater Resources to identify adverse environmental effects.

- Hyd-1.6** Implement, and revise as necessary, Board Policy I-84 requiring that discretionary project applications include commitments from available water and sanitation districts.

- Hyd-1.7** Ensure County planning staff participation in the review of wastewater facility long range and capital improvement plans.

- Hyd-1.8** Allow wastewater facilities contingent upon approval of Major Use Permit to ensure facilities are adequately sized.

- Hyd-1.9** Review septic system design, construction, and maintenance in

cooperation with the Regional Water Quality Control Board through the Septic Tank Permit Process.

- Hyd-1.10** Coordinate with the State Water Resources Control Board to develop statewide performance and design standards for conventional and alternative On-site Wastewater Treatment Systems.
- Hyd-2.1** Implement, and revise as necessary, Board Policy I-84 requiring that discretionary project applications include commitments from available water districts. Also implement and revise as necessary Board Policy G-15 to conserve water at County facilities.
- Hyd-2.2** Implement the Groundwater Ordinance to balance groundwater resources with new development. Also revise the Ordinance Relating to Water Conservation for Landscaping (currently Zoning Ordinance Sections 6712 through 6725) to further water conservation through the use of recycled water.
- Hyd-2.3** Establish a water credits program between the County and the Borrego Water District to provide a streamlined and consistent process for the permanent cessation of outdoor water intensive uses such as irrigated agricultural or golf course land.
- Hyd-2.4** Coordinate with the San Diego County Water Authority and other water agencies to coordinate land use planning with water supply planning and implementation and enhancement of water conservation programs.
- Hyd-2.5** Implement and revise as necessary the Resource Protection Ordinance and Policy I-68 Proposed Projects in Flood Plains / Floodways to restrict development in flood plains / floodways.
- Hyd-3.1** Implement and revise, as necessary, ordinances to require new development to be located down and away from ridgelines, conform to the natural topography, not significantly alter dominant physical characteristics of the site, and maximize natural drainage and topography when conveying stormwater.
- Hyd-3.2** Implement and revise as necessary the RPO to limit development on steep slopes. Also incorporate Board Policy I-73, the Hillside Development Policy, into the RPO to the extent that it will allow for one comprehensive approach to steep-slope protections.
- Hyd-3.3** Implement the Grading, Clearing and Watercourses Ordinance to protect development sites against erosion and instability.
- Hyd-4.1** Implement the Flood Damage Prevention Ordinance to reduce flood losses

in specified areas.

- Hyd-4.2** Implement the Grading, Clearing and Watercourses Ordinance to limit activities affecting watercourses.
- Hyd-4.3** Implement and revise as necessary Board Policies such as: Policy I-68, which establishes procedures for projects that impact floodways; Policy I-45, which defines watercourses that are subject to flood control; and Policy I-56, which permits, and establishes criteria for, staged construction of off-site flood control and drainage facilities by the private sector when there is a demonstrated and substantial public, private or environmental benefit.
- Hyd-6.1** Implement the RPO to prohibit development of permanent structures for human habitation or employment in a floodway and require planning of hillside developments to minimize potential soil, geological and drainage problems.
- Hyd-8.1** Perform regular inspections and maintenance of County reservoirs to prevent dam failure.
- Hyd-8.2** Review discretionary projects for dam inundation hazards through application of the County's Guidelines for Determining Significance for Hydrology and Guidelines for Determining Significance for Emergency Response Plans.

A hydrology and water quality analysis will be conducted to analyze the Project's consistency with CEQA Guidelines Appendix G and County Guidelines for Determining Significance, Hydrology and Water Quality, such as pollutant emissions and concentrations associated with the Ordinance Update. A brief discussion is provided below; however, this issue will be fully analyzed in the SEIR.

A. Violation of any waste discharge requirements

Supplemental Analysis Required: Future construction associated with implementation of the Ordinance Update would be required to comply with federal, state, and local measures, including San Diego Regional Water Quality Control Board Order R9-2007-01 and the County of San Diego Code of Regulatory Ordinances, Chapter 8, Watershed Protection, Stormwater Management, and Discharge Control, Sections 67.801–67.814. Construction activities associated with implementation of the Project could potentially result in an increase in stormwater runoff and pollutant discharge. This issue will be analyzed further in the SEIR.

B. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin

Supplemental Analysis Required: Implementation of the Project would allow for the streamlining of agricultural and residential grading and clearing throughout the unincorporated county. These areas would be located in various hydrologic subarea and various hydrologic units in the county, some of which are included in the federal CWA as a water body that is impaired. This issue will be analyzed further in the SEIR.

C. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or through the addition of impervious surface, in a manner which would:

- i) **Result in substantial erosion or siltation on- or off-site;**
- ii) **Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;**
- iii) **Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or**
- iv) **Impede or redirect flood flows?**

Supplemental Analysis Required: The Project will include, but is not limited to, changes to the grading and clearing requirements, thresholds for permit requirements, and permit process. The Project will include evaluation of providing a ministerial permit process for grading and/or clearing for housing located in VMT Efficient or Infill Areas. Construction activities including grading and clearing associated with the Ordinance Update could result in the alteration of drainage patterns, which would result in erosion or siltation, increase the rate or amount of surface runoff that would result in flooding on or off site, exceed the capacity of existing or planned stormwater drainage systems, and impede or redirect flood flows. This issue will be analyzed further in the SEIR.

D. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

Supplemental Analysis Required: Construction activities under the Ordinance Update would be concentrated in the unincorporated areas of the county, which are more than 1 mile inland and, therefore, are not likely to experience tsunami or seiche. However, implementation of the Project would include agricultural and residential clearing and grading activities, which could occur within a 100-year flood hazard area. This issue will be analyzed further in the SEIR.

E. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Supplemental Analysis Required: Implementation of the Ordinance Update could include the use of groundwater during construction activities. The Sustainable Groundwater Management Act requires basins to be sustainably managed by local public agencies (e.g., counties, cities, and water agencies) who become groundwater sustainability agencies. The primary purpose of the groundwater sustainability agencies is to develop and implement a Groundwater Sustainability Plan to achieve long-term groundwater sustainability. In San Diego County, the state has designated three of the county’s basins as medium- or high-priority and subject to Sustainable Groundwater Management Act: Borrego Valley, San Luis Rey Valley, and San Pasqual Valley.

Unincorporated communities of the county are located within the three basins. The Groundwater Sustainability Plans for the basins designate beneficial uses for water and establish water quality objectives and implementation plans to protect those beneficial uses. The Project will include, but is not limited to, changes to the grading and clearing requirements, thresholds for permit requirements, and permit process. The Project will include evaluation of providing a ministerial permit process for grading and/or clearing for housing located in VMT Efficient or Infill Areas. Construction activities including grading and clearing associated with the Ordinance Update could result in conflicts with or obstruction of implementation of a sustainability plan. This issue will be analyzed further in the SEIR.

XI. LAND USE AND PLANNING - Since the previous EIR was certified, are there any changes in the Project, changes in circumstances under which the Project is undertaken and/or “new information of substantial importance” that cause one or more effects to land use and planning including: physically dividing an established community; and/or conflicts with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the Project adopted for the purpose of avoiding or mitigating an environmental effect?

YES	NO
<input checked="" type="checkbox"/>	<input type="checkbox"/>

2011 San Diego County General Plan Update PEIR

The 2011 GPU PEIR determined that implementation of the General Plan Update would have less than significant impacts associated with conflicting with applicable land use plans, policies, and regulations, and applicable HCP or NCCP.

The PEIR also determined that implementation of the General Plan Update would have potentially significant impacts associated with physical division of an established community. However, potential impacts would be reduced to less than significant levels with implementation of mitigation (described below).

2011 GPU PEIR Mitigation Measures

Lan-1.1 Coordinate with adjacent cities and other agencies regarding planning

efforts and resource protection. This includes working with SANDAG during updates to the RTP to ensure that regional roads are properly planned, sited, and designed. Additional on-going consultations include coordination with state, federal, and local agencies regarding the high speed rail, the Sunrise Powerlink, and tribal casinos.

Lan-1.2 Coordinate with land owners, other departments, and community groups to ensure that both public and private development projects and associated infrastructure minimize impacts to established communities. This involves community input and General Plan conformance reviews on County road projects to insure that County road planning and development is consistent with the General Plan. This also includes analysis of potential environmental impacts for public and private road projects and application of mitigation measures pursuant to CEQA. DPW policies and procedures shall be evaluated to ensure that such reviews are conducted and that issues regarding potential division of communities are identified and addressed. General Plan Amendments that propose changes to the circulation network shall be kept consistent with the General Plan Goals and Policies, and such proposals will also be reviewed by the communities. In addition, Board Policy I-63 and/or department procedures will be updated to meet this standard.

Lan-1.3 Maintain plans and standards for infrastructure and roads so that divisions of communities do not occur. This will include: 1) updates to County Road Standards to ensure that roads are designed and built in a safe manner consistent with the General Plan and community context; 2) adherence to Community Plans to guide infrastructure planning in the individual and unique communities of the County; 3) evaluation and, if necessary, revisions to the subdivision ordinance to ensure future project designs, and corresponding infrastructure designs, are consistent with the General Plan and with established community character; 4) preparation of local public road network plans to improve mobility, connectivity, and safety; and 5) preparation of community road standards that supplement the County road standards in order to recognize the unique constraints and character of different communities.

A. Physically dividing an established community

Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR: The Project will include, but is not limited to, changes to the grading and clearing requirements, thresholds for permit requirements, and permit process. The Project will include evaluation of providing a ministerial permit process for grading and/or clearing for housing located in VMT Efficient or Infill Areas. The Ordinance amendment would not change the locations where agricultural and residential clearing and grading may be permitted. Ordinance amendments would not result in the introduction of new infrastructure, such as major roadways that would divide established communities in the unincorporated areas of the county. Therefore, the Project would not

significantly disrupt or divide an established community. This issue will not be analyzed further in the SEIR.

B. Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project adopted for the purpose of avoiding or mitigating an environmental effect

Supplemental Analysis Required: The County General Plan is the guiding land use policy document for all areas under the County's jurisdiction. The Project would amend the Ordinance to update the clearing and grading permit process. The Project includes but may not be limited to changes to the grading requirements, thresholds for permit requirements, and permit process. Further discussion is needed to determine if reasonably foreseeable future projects could result in inconsistencies with applicable regulations, which could then lead to a conflict with applicable land use plans that may cause a significant environmental impact. This issue will be analyzed further in the SEIR.

XII. MINERAL RESOURCES – Since the previous EIR was certified or previous ND was adopted, are there any changes in the Project, changes in circumstances under which the Project is undertaken and/or "new information of substantial importance" that cause one or more effects to mineral resources including: the loss of availability of a known mineral resource that would be of value to the region and the residents of the state; and/or loss of locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

YES	NO
<input checked="" type="checkbox"/>	<input type="checkbox"/>

2011 San Diego County General Plan Update PEIR

The GPU PEIR determined that implementation of the General Plan Update would have the potential to result in potentially significant impacts both with the loss of availability of mineral resources and the loss of locally important mineral resource recovery sites. Implementation of the proposed General Plan Update policies and mitigation measures (described below) would reduce impacts, but not to below a level of significance. Impacts would remain significant and unavoidable. Additionally, the Project could result in a cumulatively considerable and unavoidable contribution to a significant cumulative impact associated with these impacts.

2011 GPU PEIR Mitigation Measures

Min-1.1 Assess the impact of new development on mineral resources as required by the County Guidelines for Determining Significance for Mineral Resources. Update the CEQA Guidelines for Determining Significance (Mineral Resources) to include the requirement to evaluate whether access is being maintained to existing mining sites.

Min-1.2 Revise and update the County ordinances to designate areas of known

importance for mineral resources as follows:

- Update the Zoning Ordinance with the addition of a Mining Compatibility Designator or Overlay that identifies parcels with a high potential for mineral resources. The purpose is to take into account the potential mineral resources not to preclude the potential mining use. In addition, specify that notification of potential mining use is provided to all parcels within a 1,500 foot radius of parcels with a Mining Compatibility Designator/Overlay. •
- Revise the Zoning Ordinance to facilitate recycling of salvaged concrete, asphalt, and rock at permitted mining facilities.
- Revise the Zoning Ordinance and Grading Ordinance to authorize surface mining operations with a Surface Mining Permit rather than a MUP. Incorporate findings of approval that reflect Mineral Compatibility Designator, SMARA Sections 2762 and 2763, and the inherent nature of surface mining operations. Parcels with a high potential for mineral resources could include those areas designated as MRZ-2 or other areas identified as containing mineral resources that are located where a sufficient buffer is available so that extraction activities are feasible.

Min-1.3 Request that the State Geologist identify mineral resources in previously unmapped areas of East and North County.

A. The loss of availability of a known mineral resource that would be of value to the region and the residents of the state

Supplemental Analysis Required: The unincorporated areas of the county include lands designated as Mineral Resource Zone (MRZ)-2 having resources present and MRZ-3 containing known mineral deposits that could qualify as mineral resources. The Project proposes to amend the Ordinance to update the clearing and grading permit process. Construction activities associated with the Ordinance change could result in the loss of availability of a known mineral resource that would be value to the region and residents of the state. This issue will be analyzed further in the SEIR.

B. Loss of locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan

Supplemental Analysis Required: The Project will include, but is not limited to, changes to the grading and clearing requirements, thresholds for permit requirements, and permit process. The Project will include evaluation of providing a ministerial permit process for grading and/or clearing for housing located in VMT Efficient or Infill Areas. Construction activities associated with the Ordinance change could encroach on areas where mines are active or where future resource recovery sites would have otherwise been permitted, resulting in a loss of availability of locally important mineral resource recovery site. This issue will be analyzed further in the SEIR.

XIII. NOISE – Since the previous EIR was certified or previous ND was adopted, are there any changes in the Project, changes in circumstances under which the Project is undertaken and/or "new information of substantial importance" that result in one or more effects from noise including: 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; exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels; a substantial permanent increase in ambient noise levels in the Project vicinity above levels existing without the Project; a substantial temporary or periodic increase in ambient noise levels in the Project vicinity above levels existing without the Project; for projects 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, or for projects within the vicinity of a private airstrip, would the Project expose people residing or working in the Project Area to excessive noise levels?

YES NO

2011 San Diego County General Plan Update PEIR

The GPU PEIR determined that implementation of the General Plan Update would have a less than significant impact with implementation of mitigation (described below) with regard to exposing land uses to noise levels in excess of noise compatibility guidelines. The PEIR also determined that a less than significant impact with implementation of mitigation with regard to groundborne vibration sensitive land uses near the Sprinter Rail Line and where construction equipment would operate within vibration-sensitive land uses. It was determined that implementation of the General Plan Update would result in a significant and unavoidable impact as it would permanently increase ambient noise along roadways. Implementation of the General Plan Update was found to have a less than significant impact with implementation of mitigation (described below) with regard to temporary increases in ambient noise levels, and exposure to noise sensitive land uses to excessive noise from a public or private airport.

2011 GPU PEIR Mitigation Measures

Noi-1.1 Require an acoustical analysis whenever a new development may result in any existing or future noise sensitive land uses being subject to on-site noise levels of 60 dBA (CNEL) or greater, or other land uses that may result in noise levels exceeding the "Acceptable" standard in the Noise Compatibility Guidelines (Table N-1 in the Noise Element).

Noi-1.2 Revise the Guidelines for Determining Significance for new developments where the exterior noise level on patios or balconies for multi-family residences or mixed-use development exceeds 65 dBA (CNEL), a solid noise barrier is incorporated into the building design of balconies and patios for units that exceed 65 dBA (CNEL) while still maintaining the openness of the patio or balcony.

- Noi-1.3** Require an acoustical study for projects proposing amendments to the County General Plan Land Use Element and/or Mobility Element that propose a significant increase to the average daily traffic due to trips associated with the project beyond those anticipated in the General Plan.
- Noi-1.4** Edit the Guidelines for Determining Significance standard mitigation and project design considerations to promote traffic calming design, traffic control measures, and low-noise pavement surfaces that minimize motor vehicle traffic noise.
- Noi-1.5** Coordinate with Caltrans and SANDAG as appropriate to identify and analyze appropriate route alternatives that may minimize noise impacts to noise sensitive land uses within the unincorporated areas of San Diego County.
- Noi-1.6** Coordinate with SANDAG, MTS, California High-Speed Rail Authority as appropriate, and passenger and freight train operators to install noise attenuation features to minimize impacts to adjacent residential or other noise sensitive land uses.
- Noi-1.7** Work with project applicants during the scoping phase of proposed projects to take into consideration impacts resulting from on-site noise generation to noise sensitive land uses located outside the County's jurisdictional authority. The County will notify and coordinate with the appropriate jurisdiction(s) to determine appropriate project design techniques and/or mitigation.
- Noi-1.8** Implement and/or establish procedures (or cooperative agreements) with Caltrans, the City of San Diego, and other jurisdictions as appropriate to ensure that a public participation process or forum is available for the affected community to participate and discuss issues regarding transportation generated noise impacts for new or expanded roadway projects that may affect noise sensitive land uses within the unincorporated areas of San Diego County.
- Noi-1.9** Coordinate with Caltrans and the DPLU Landscape Architect, and receive input from community representatives as appropriate (e.g., Planning or Sponsor Group) to determine the appropriate noise mitigation measure (planted berms, noise attenuation barriers or a combination of the two) to be required as a part of the proposals for roadway improvement projects and ensure that the County's Five Year Capital Improvement Program and Preliminary Engineering Reports address noise impacts and appropriate mitigation measures for road improvement projects within or affecting the unincorporated area of the County.
- Noi-2.1** For Land Use Designations defined in Table 2.11-14, a ground-borne vibration technical study shall be required for proposed land uses within the following distances from the Sprinter Rail Line right-of-way and the property

line: 600 feet of a Category 1 Land Use, 200 feet of a Category 2 Land Use, and 120 feet of a Category 3 Land Use. If necessary, mitigation shall be required for land uses in compliance with the standards listed in Tables 2 and 3 of the County of San Diego Guidelines for Determining Significance - Noise.

- Noi-2.2** Revise the County CEQA determinations of significance to reflect limits in the Noise Compatibility Guidelines and Noise Standards [Policy N-3.1]. Periodically review the Guidelines for Determining Significance to incorporate standards for minimizing effects of groundborne vibration during project operation or construction.
- Noi-2.3** Review project applications for industrial facilities to ensure they are located in areas that would minimize impacts to noise-sensitive land uses. Revise CEQA Guidelines for Determining Significance to incorporate appropriate noise attenuation measures for minimizing industrial-related noise.
- Noi-2.4** Require an acoustical study whenever a proposed extractive land use facility may result in a significant noise impact to existing noise sensitive land uses, or when a proposed noise sensitive land use may be significantly affected by an existing extractive land use facility. The results of the acoustical study may require a “buffer zone” to be identified on all Major Use Permit applications for extractive facilities whenever a potential for a noise impact to noise sensitive land uses may occur.
- Noi-3.1** Ensure that for new County road improvement projects either the County’s Noise Standards are used to evaluate noise impacts or the project does not exceed 3 decibels over existing noise levels [Policy N-4.6].
- Noi-3.2** Work with the project applicant during the review of either the building permit or discretionary action (whichever is applicable) to determine appropriate noise reduction site design techniques that include:
- Orientation of loading/unloading docks away from noise sensitive land uses
 - Setbacks or buffers to separate noise generating activities from noise sensitive land uses.
 - Design on-site ingress and egress access away from noise sensitive land uses [Policy N-5.1]
- Noi-4.1** Periodically review and revise the Noise Ordinance and Section 6300 of the Zoning Ordinance as necessary to ensure appropriate restrictions for intermittent, short-term, or other nuisance noise sources.
- Noi-4.2** Augment staff and equipment as appropriate to facilitate enforcement of the Noise Ordinance.

- Noi-5.1** Use the applicable Airport Land Use Compatibility Plan's (ALUCP) as guidance/reference during development review of projects that are planned within an Airport Influence Area (AIA). Any projects that are within the AIA shall be submitted to the San Diego County Regional Airport Authority (SDCRAA) for review.
- Noi-5.2** Evaluate noise exposure impacts related to a private airport or heliport use or consistency with the FAA standards.
- Noi-5.3** Consult with the FAA standards and the County Noise Ordinance as a guide for assessing noise impacts from private airports and helipads.

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

Supplemental Analysis Required: The County General Plan Noise Element, Tables N-1 and N-2, include noise sensitive areas and requires an acoustical study to be prepared for any use that may expose a noise sensitive area to noise in excess of a Community Noise Equivalent Level (CNEL) of 60 A-weighted decibels (dBA). Moreover, if a project would be in excess of 60 dBA CNEL, modifications must be made to projects to reduce noise levels. Noise sensitive areas include residences, hospitals, schools, libraries, or similar facilities, as mentioned in Tables N-1 and N-2 of the County General Plan Noise Element (County of San Diego 2011b). The Project will include, but is not limited to, changes to the grading and clearing requirements, thresholds for permit requirements, and permit process. The Project will include evaluation of providing a ministerial permit process for grading and/or clearing for housing located in VMT Efficient or Infill Areas.

Implementation of the Project may result in construction activities that could generate noise levels in excess of standards established in the County General Plan Noise Element. This issue will be analyzed further in the SEIR.

B. A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project

Supplemental Analysis Required: The Project will include, but is not limited to, changes to the grading and clearing requirements, thresholds for permit requirements, and permit process. The Project will include evaluation of providing a ministerial permit process for grading and/or clearing for housing located in VMT Efficient or Infill Areas. Implementation of the Project may result in construction activities that could generate substantial increases in ambient noise levels in excess of standards established in the County General Plan Noise Element. This issue will be analyzed further in the SEIR.

C. Exposure of persons to or generation of excessive groundborne vibration of groundborne noise levels

Supplemental Analysis Required: The Project will include, but is not limited to, changes to the grading and clearing requirements, thresholds for permit requirements, and permit process. The Project will include evaluation of providing a ministerial permit process for

grading and/or clearing for housing located in VMT Efficient or Infill Areas. Implementation of the Project may result in construction activities that could generate excessive groundborne vibration or groundborne noise levels. This issue will be analyzed further in the SEIR.

D. Expose people residing or working in the project area to excessive noise levels for a project located within the vicinity of a private airstrip or 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

Supplemental Analysis Required: Seven airports are located in the unincorporated San Diego County: Agua Caliente Springs Airport, Borrego Valley Airport, Fallbrook Airpark, Gillespie Field, Jacumba Airport, Ocotillo Airport, and Ramona Airport. The Project would amend the Ordinance to update the clearing and grading permit process. Implementation of the Project may result in construction activities that could occur within an airport's 60 dB contour lines. Construction in these areas could expose workers on the Project Site to excessive noise exceeding 60 dB resulting from aircraft noise. This issue will be analyzed further in the SEIR.

XIV. POPULATION AND HOUSING – Since the previous EIR was certified or previous ND was adopted, are there any changes in the Project, changes in circumstances under which the Project is undertaken and/or "new information of substantial importance" that result in one or more effects to population and housing including displacing substantial numbers of existing housing or people, necessitating the construction of replacement housing elsewhere?

YES	NO
<input checked="" type="checkbox"/>	<input type="checkbox"/>

2011 San Diego County General Plan Update PEIR

The GPU PEIR determined that implementation of the General Plan Update would result in less than significant impacts with regard to population growth, displacement of housing, and displacement of people. No mitigation was designated for this topic.

A. Induce substantial unplanned 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)

Supplemental Analysis Required: The Project will include, but is not limited to, changes to the grading and clearing requirements, thresholds for permit requirements, and permit process. The Project will include evaluation of providing a ministerial permit process for grading and/or clearing for housing located in VMT Efficient or Infill Areas. The Ordinance amendment could result in direct population growth through construction of new homes, although the Project would not include any increase in density or intensity of land use or zoning analyzed in the General Plan. This issue will be analyzed further in the SEIR.

B. Displace substantial numbers of existing housing or people, necessitating the construction of replacement housing elsewhere

No Impact/No Changes or New Information Requiring Preparation of an EIR. The Project will include, but is not limited to, changes to the grading and clearing requirements, thresholds for permit requirements, and permit process. The Project will include evaluation of providing a ministerial permit process for grading and/or clearing for housing located in VMT Efficient or Infill Areas. The Ordinance amendment does not include regulatory changes that would take away from existing residential housing or replace housing with alternate uses, necessitating the construction of replacement housing elsewhere. Therefore, the Project would not displace substantial numbers of people, necessitating the construction of replacement housing, and no impacts would occur. This issue will not be analyzed further in the SEIR.

XV. PUBLIC SERVICES – Since the previous EIR was certified or previous ND was adopted, are there any changes in the Project, changes in circumstances under which the Project is undertaken and/or "new information of substantial importance" that result in one or more substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the following public services: fire protection, police protection, schools, parks, or other public facilities?

YES NO

2011 San Diego County General Plan Update PEIR

The GPU PEIR determined that implementation of the General Plan Update would result in less than significant impacts with implementation of mitigation (described below) with regard to fire protection services, police protection services, and other public services. The PEIR also identified that impacts to school services would remain significant and unavoidable even with incorporation of mitigation.

2011 GPU PEIR Mitigation Measures

- Pub-1.1** Participate in interjurisdictional reviews to gather information on and review and provide comments on plans for new or expanded governmental facilities in the region.

- Pub-1.2** Plan and site governmental facilities that are context-specific according to their location in village, semi-rural, or rural lands.

- Pub-1.3** Revise Board Policy I-63 to minimize leapfrog development and to establish specific criteria for GPAs proposing expansion of areas designated Village regional category. This is intended to limit unexpected demands for new or

expanded public services and the associated governmental facilities.

- Pub-1.4** Review General Plan Amendments for consistency with the goals and policies of the General Plan such that future development in hazardous wildfire areas will be limited to low-density land uses that do not necessitate extensive new fire protection facilities.
- Pub -1.5** Implement, and revise as necessary, Board Policy I-84 requiring that discretionary project applications include commitments from available fire protection districts. These commitments shall also demonstrate that the distance between the projects and the fire service facilities do not result in unacceptable travel times.
- Pub -1.6** Maintain and use the County GIS and the County Guidelines for Determining Significant impacts in order to identify fire prone areas during the review of development projects. Once identified, ensure that development proposals meet requirements set by the FAHJ and that new/additional fire protection facilities are not required; or, if such facilities are required, that potential environmental impacts resulting from construction are evaluated along with the development project under review.
- Pub -1.7** Implement the Building and Fire code to ensure there are adequate fire protections in place associated with the construction of structures and their defensibility, accessibility and egress, adequate water supply, coverage by the local fire district, and other critical issues.
- Pub -1.8** Require CEQA reviews on new public facilities (fire, sheriff, libraries, etc.) or significant expansions and mitigation of environmental impact to the extent feasible.
- Pub -1.9** Implement procedures to ensure new development projects fund their fair share toward fire services facilities including the development of a long-term financing mechanism, such as an impact fee program or community facilities development, as appropriate. Large development projects are required to provide their fair share contribution to fire services either by providing additional funds and/or development of infrastructure.
- Pub-3.1** Coordinate with school districts to encourage siting new facilities in accordance with the County's General Plan and encourage implementing feasible mitigation measures to mitigate environmental impacts.
- Pub-3.2** Implement, and revise as necessary, Board Policy I-84 requiring that discretionary project applications include commitments from available school districts.

A. Would the Proposed Project result in one or more substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities or the need for new or physically altered

governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the following public services:

1. Fire Protection

No Impact/No Changes or New Information Requiring Preparation of an EIR: The Project would not result in the need for significantly altered fire protection services or facilities. The Project does not involve the construction of new or physically altered government facilities including but not limited to fire protection facilities. The Project includes an amendment to the Ordinance to update the clearing and grading permit process. The Project would not generate an increase in population leading to increased need for services. No impact would occur. This issue will not be analyzed further in the SEIR.

2. Police Protection

No Impact/No Changes or New Information Requiring Preparation of an EIR: The Project would not create the need for additional police protection or facilities and would not require the construction of new or physically altered government facilities, such as police facilities. The proposed Ordinance amendment would not generate an increase in population; no substantial demand would be placed on existing public services, such as police protection; and no new facilities would need to be developed. Because no substantial effects on the ability to affect performance objectives related to police protection and facilities would occur, no impacts on public services would occur. This issue will not be analyzed further in the SEIR.

3. Schools

No Impact/No Changes or New Information Requiring Preparation of an EIR: The Project would not create the need for additional school services and would not require the construction of new or physically altered government facilities, such as schools. The Ordinance amendment would not generate an increase in population, no substantial demand would be placed on existing public services, such as school services, and no new facilities would need to be developed. Because no substantial effects on the ability to affect performance objectives related to school services would occur, no impacts on public services would occur. This issue will not be analyzed further in the SEIR.

4. Parks

No Impact/No Changes or New Information Requiring Preparation of an EIR: The Project would not create the need for additional park services and would not require the construction of new or physically altered government facilities, such as parks. The proposed Ordinance amendment would not generate an increase in population, no substantial demand would be placed on existing public services, such as parks, and no new facilities would need to be developed. Because no substantial effects on the ability to affect performance objectives related to parks would occur, no impacts on public services would occur. This issue will not be analyzed further in the SEIR.

5. Other Public Facilities

No Impact/No Changes or New Information Requiring Preparation of an EIR: The Project would not create the need for additional public services and would not require the construction of new or physically altered government facilities. The proposed Ordinance amendment would not generate an increase in population, no substantial demand would be placed on existing public services, and no new facilities would need to be developed. Because no substantial effects on the ability to affect performance objectives related to other public facilities would occur, no impacts on public services would occur. This issue will not be analyzed further in the SEIR.

XVI. RECREATION - Since the previous EIR was certified or previous ND was adopted, are there any changes in the Project, changes in circumstances under which the Project is undertaken and/or "new information of substantial importance" that result in an increase in 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; or that include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

YES NO

2011 San Diego County General Plan Update PEIR

The GPU PEIR determined that implementation of the General Plan Update would result in less than significant impacts with implementation of mitigation (described below) with regard to both the deterioration of parks and recreational facilities and the construction of new recreational facilities.

2011 GPU PEIR Mitigation Measures

- Rec -1.1** Implement Board Policy I-44 to identify park and recreation needs and priorities for communities, and utilize the Community Plans when identifying park and recreation facility requirements.
- Rec -1.2** Coordinate with communities, agencies and organizations to identify, prioritize and develop park and recreation needs. This shall include pursuing partnership opportunities with school districts and other agencies to develop new park and recreation facilities; on-going support of the Park Advisory Committee and use of community center surveys to solicit input on park and recreation program and facility needs and issues; and continuing partnerships with other jurisdictions to share operation and maintenance costs for facilities via joint powers agreements.
- Rec -1.3** Prepare a design manual to provide concepts for park and recreation facility components.

- Rec -1.4** Participate in discretionary project review of residential projects with 50 or more units to identify park facility needs. Also, implement the Subdivision Ordinance to require the provision of trail and pathways shown on the Regional Trails Plan or Community Trails Master Plan. In addition, modify development standards and design guidelines to include common open space amenities, such as tot lots, and the use of universal design features that accommodate both abled and disabled individuals.
- Rec -1.5** Attain funding for land acquisition and construction of recreational facilities by taking the following actions: implement the PLDO; solicit grants and bonds to fund the operation and maintenance of park and recreation facilities; and form Landscape Improvement Districts and County Service Areas.
- Rec -1.6** Acquire trail routes across private lands through direct purchase, easements, and dedication, or by other means from a willing property owner/seller. Encourage the voluntary dedication of easements and/or gifts of land for trails through privately-owned lands, including agricultural and grazing lands.
- Rec -1.7** Prioritize the acquisition and development of trail segments in a manner to provide maximum environmental and public benefit given available public and private resources and the population served. As part of this effort, also maintain a database of information on the locations, status of easements, classifications, forms of access, management activities and land ownership relative to trail facilities.
- Rec -1.8** Implement and revise as necessary the Regional Trails Plan as well as the Community Trails Master Plan. This will ensure that community goals, policies, and implementation criteria are defined for community trails. Facilitate interjurisdictional coordination for the implementation of these plans.
- Rec -1.9** Consult with the appropriate governing tribal council to facilitate the provision of trail connections through tribal land and/or Native American cultural resource.
- Rec -1.10** Develop procedures to coordinate the operation and maintenance of pathways with similar activities for adjacent roads and road rights-of-way.
- Rec -1.11** Prioritize open space acquisition needs through coordination with government agencies and private organizations. Once prioritized, acquire open space lands through negotiation with private land owners and through MSCP regulatory requirements. The operation and management of such acquisitions will continue to be achieved by preparing, implementing, and updating Resource Management Plans and MSCP Area Specific Management Directives (ASMDs) for each open space area.
- Rec -2.1** Update Community Plans to reflect the character and vision for each

individual community; to address civic needs in a community and encourage the colocation of uses; to establish and maintain greenbelts between communities; to prioritize infrastructure improvements and the provision of public facilities for villages and community cores; and to identify pedestrian routes. With these issues addressed in community plans, potential impacts to visual resources, community character, natural resources, cultural resources, and traffic will be substantially lessened should new or expanded recreational facilities be needed in a given community.

Rec -2.2 Use community design guidelines as a resource when designing park and recreation facilities. This will help ensure that such facilities are consistent with community character.

Rec -2.3 Amend the Subdivision Ordinance to require new residential development to be integrated with existing neighborhoods by providing connected and continuous road, environmentally-sensitive pathway/trail and recreation/open space networks. Also add new conservation-oriented design guidelines for rural lands projects as part of this amendment. These measures will assist in the planning for recreational facilities as new development is proposed while minimizing impacts to sensitive resources and community character.

Rec -2.4 Develop procedures to consider designating trails that correspond to existing (non-designated) trails, paths, or unpaved roadbeds that already have a disturbed tread. This will minimize new impacts to the natural environment and will potentially benefit existing trail users.

Rec -2.5 Through implementation of Resource Management Plans, monitor and manage preserves and trails such that environmental resources do not become impacted as a result of soil erosion, flooding, fire hazard, or other environmental or manmade effects. Any impacts identified to environmental resources will be restored in accordance with the management directives within the Resource Management Plans.

Rec -2.6 Develop procedures to encourage the involvement and input of the agricultural community in matters relating to trails on or adjacent to agricultural lands and place a priority on the protection of agriculture.

A. Result in an increase in 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

Supplemental Analysis Required: The Project will include, but is not limited to, changes to the grading and clearing requirements, thresholds for permit requirements, and permit process. The Project will include evaluation of providing a ministerial permit process for grading and/or clearing for housing located in VMT Efficient or Infill Areas. The Ordinance amendment could result in construction of new residential units which may increase the

use of existing neighborhood and regional parks. This issue will be analyzed further in the SEIR.

B. Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment

No Impact/No Changes or New Information Requiring Preparation of an EIR: The Project would amend the Ordinance to update the clearing and grading permit process. The Project does not include the construction of, or expansion of, recreational facilities; therefore, no physical impact on the environment would occur. This issue will not be analyzed further in the SEIR.

XVII. TRANSPORTATION – Since the previous EIR was certified or previous ND was adopted, are there any changes in the Project, changes in circumstances under which the Project is undertaken and/or "new information of substantial importance" that cause effects to transportation/traffic including: a conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., transit, roadway, bicycle and pedestrian facilities); conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b) regarding vehicles miles traveled (VMT); substantial increase in hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment); inadequate emergency access?

YES	NO
<input checked="" type="checkbox"/>	<input type="checkbox"/>

2011 San Diego County General Plan Update PEIR

The GPU PEIR determined that implementation of the General Plan Update would result in significant and unavoidable impacts with regard to unincorporated county traffic and level of service standards; adjacent cities traffic and level of service standards; and rural road safety. However, the PEIR also determined that less than significant impacts with implementation of mitigation (described below) would occur with regard to emergency access, parking capacity, and alternative transportation.

Mitigation Measures

- Tra -1.1** Coordinate with SANDAG and adjacent cities during updates to the RTP to identify a transportation network that maximizes efficiency, enhances connectivity between different modes of travel, and minimizes impacts when locating new freeways and State highways.
- Tra -1.2** Coordinate with Caltrans and adjacent jurisdictions during planning and design for improvements to the freeway and State highway network.
- Tra -1.3** Implement the County Public Road Standards during review of new development projects. Also revise the Public Road Standards to include a

range of road types according to Regional Category context.

- Tra -1.4** Implement and revise as necessary the County Guidelines for Determining Significance for Transportation and Traffic to evaluate adverse environmental effects of projects and require mitigation when significant impacts are identified.
- Tra -1.5** Implement the Congestion Management Strategies identified in the Regional Transportation Plan and require large projects to mitigate impacts to State highways and freeways.
- Tra -1.6** Develop project review procedures to require large commercial and office development to use Transportation Demand Management Programs to reduce single-occupant vehicle traffic generation and to prepare and forward annual reports to the County on the effectiveness of the program.
- Tra -1.7** Implement the San Diego County TIF Ordinance, which defrays the costs of constructing planned transportation facilities necessary to accommodate increased traffic generated by future development.
- Tra -2.1** Establish coordination efforts with other jurisdictions when development projects will result in a significant impact on city roads. When available, use the applicable jurisdiction's significance thresholds and recommended mitigation measures to evaluate and mitigate impacts.
- Tra -3.1** Coordinate with SANDAG to obtain funding for operational improvements to State highways and freeways in the unincorporated area.
- Tra -4.1** Update Community Plans to identify local public road and community emergency evacuation route networks and pedestrian routes as appropriate.
- Tra -4.2** Implement the Building and Fire Codes to ensure there are adequate service levels in place associated with the construction of structures and their accessibility and egress.
- Tra -4.3** Implement and revise as necessary the County Guidelines for Determining Significance for Wildland Fire and Fire Protection to evaluate adverse environmental effects of projects. Require fire protection plans to ensure the requirements of the County Fire Code and other applicable regulations are being met.
- Tra -4.4** Implement and revise as necessary the Subdivision Ordinance to ensure that proposed subdivisions meet current design and accessibility standards.
- Tra -5.1** When updating the Zoning Ordinance, review and revise parking regulations for senior housing and affordable housing, utilizing data from studies conducted for these groups.
- Tra -5.2** Prepare town center plans for village areas that incorporate shared parking

facilities and include in Community Plans or other appropriate documents.

- Tra -5.3** Revise the Public Road Standards to include standards for the provision of parallel and diagonal on-street parking, according to Regional Category.
- Tra -6.1** During Community Plan updates, establish policies and design guidelines that encourage commercial centers in compact walkable configurations and discourage “strip” commercial development.
- Tra -6.2** Establish comprehensive planning principles for transit nodes such as the SPRINTER Station located in North County Metro.
- Tra -6.3** Locate County facilities near transit facilities, whenever feasible.
- Tra -6.4** Coordinate with SANDAG, Caltrans, and tribal governments to maximize opportunities to locate park and ride facilities.
- Tra -6.5** Coordinate with SANDAG, Caltrans, and transit agencies to expand the mass transit opportunities in the unincorporated county and to review the location and design of transit stops. Establish a DPLU transit coordinator to ensure land use issues are being addressed.
- Tra -6.6** Review the improvement plans for railroad facilities in the unincorporated County.
- Tra -6.7** Implement and revise the County Bicycle Transportation Plan every five years, or as necessary, to identify a long range County bicycle network and qualify for State or other funding sources. Coordinate revisions to the County Bicycle Transportation Plan with the County Trails Program.
- Tra -6.8** Coordinate with SANDAG in the development of a Regional Bicycle Plan to ensure consistency with County transportation plans. Coordinate revisions to the SANDAG Regional Bicycle Plan with the County Trails Program.
- Tra -6.9** Implement and revise as necessary the County Trails Program for trail development and management. Implement and revise as necessary the Community Trails Master Plan, which incorporates adopted individual community trail and pathway plans, based on community goals, policies, and implementation criteria.

A transportation analysis will be conducted to analyze the Project’s consistency with CEQA Guidelines Appendix G, such as program or policy compliance and VMT impacts associated with the Ordinance amendment. A brief discussion is provided below; however, this issue will be fully analyzed in the SEIR.

A. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities

Supplemental Analysis Required: The Project will include, but is not limited to, changes to the grading and clearing requirements, thresholds for permit requirements, and permit

process. The Project will include evaluation of providing a ministerial permit process for grading and/or clearing for housing located in VMT Efficient or Infill Areas. Implementation of the Ordinance Update could increase vehicle traffic, which could result in a conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. This issue will be analyzed further in the SEIR.

B. Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)

Supplemental Analysis Required: Section 15064.3 of the CEQA Guidelines details new regulations, effective statewide July 1, 2020, that set 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 nonmotorized travel. Except as provided regarding roadway capacity, a project's effect on automobile delay does not constitute a significant environmental impact.

The Project will include, but is not limited to, changes to the grading and clearing requirements, thresholds for permit requirements, and permit process. The Project will include evaluation of providing a ministerial permit process for grading and/or clearing for housing located in VMT Efficient or Infill Areas. Implementation of the Ordinance Update could increase VMT, which could conflict or be inconsistent with CEQA Guidelines, Section 15064.3(b). This issue will be analyzed further in the SEIR.

C. Substantial increase in hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)

Supplemental Analysis Required: The Project will include, but is not limited to, changes to the grading and clearing requirements, thresholds for permit requirements, and permit process. The Project will include evaluation of providing a ministerial permit process for grading and/or clearing for housing located in VMT Efficient or Infill Areas. Implementation of the Ordinance Update could indirectly increase vehicular traffic and substantially increase hazards due to a geometric design feature or incompatible uses including farm equipment. This issue will be analyzed further in the SEIR.

D. Inadequate emergency access

Supplemental Analysis Required: The Project will include, but is not limited to, changes to the grading and clearing requirements, thresholds for permit requirements, and permit process. The Project will include evaluation of providing a ministerial permit process for grading and/or clearing for housing located in VMT Efficient or Infill Areas. During construction, temporary full or partial lane closures may be necessary. The full or partial lane closures could result in the redistribution of traffic along adjacent and surrounding roadways. As construction progresses, access for emergency vehicles could be impaired as result of reduced roadway widths (or capacity) and increased volumes of construction-related traffic or redistributed traffic. Therefore, construction could result in adequate emergency access. This issue will be analyzed further in the SEIR.

XVIII. TRIBAL CULTURAL RESOURCES – Since the previous EIR was certified or previous ND was adopted, are there any changes in the Project, changes in circumstances under which the Project is undertaken and/or "new information of substantial importance" that cause effects to Tribal Cultural Resources (TCRs) such that a substantial adverse change in the significance of a TCR, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

YES NO

2011 San Diego County General Plan Update PEIR

"Tribal Cultural Resources" was not an environmental impact area considered by the GPU PEIR because under the CEQA regulations at the time this impact category was not required. However, the PEIR did consider historical or archaeological resources and human remains under the category Cultural and Paleontological Resources, refer to V. Cultural Resources above.

A tribal cultural resources analysis will be conducted to analyze the Project's consistency with CEQA Guidelines Appendix G. A brief discussion is provided below; however, this issue will be fully analyzed in the SEIR.

A. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of Historical Resources as defined in Public Resources Code §5020.1(k)

Supplemental Analysis Required: Tribal cultural resources may be found throughout the county. Information on tribal cultural resources is more difficult to obtain than most archaeological resources because no database of such resources exists and these resources cannot be identified by simply surveying the land. Identification of such resources requires coordination with Native American tribes. To obtain information from tribes regarding the potential for tribal cultural resources, the California Native American Heritage Commission was contacted to determine if sacred lands have been identified in the unincorporated county. This issue will be analyzed further in the SEIR.

B. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code §5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code §5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

Supplemental Analysis Required: Pursuant to California Public Resources Code, Section 21080.3.1 (Assembly Bill 52), California Native American tribes that are traditionally and culturally affiliated with the Project site can request notification regarding

projects in their traditional cultural territory. Native American tribes that have requested project notification under Assembly Bill 52 will be contacted and notified of the Project. Consultation will continue throughout the CEQA process. This issue will be analyzed further in the SEIR.

XIX. UTILITIES AND SERVICE SYSTEMS – Since the previous EIR was certified or previous ND was adopted, are there any changes in the Project, changes in circumstances under which the Project is undertaken and/or "new information of substantial importance" that cause effects to utilities and service systems including: exceedance of wastewater treatment requirements of the applicable Regional Water Quality Control Board; require or result in the construction of new water or wastewater treatment facilities, new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects; require new or expanded entitlements to water supplies or new water resources to serve the Project; 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; be served by a landfill with sufficient permitted capacity to accommodate the Project's solid waste disposal needs; and/or noncompliance with federal, state, and local statutes and regulations related to solid waste?

YES NO

2011 San Diego County General Plan Update PEIR

The GPU PEIR determined that implementation of the General Plan Update would result in less than significant impacts with incorporation of mitigation (described below) for wastewater treatment requirements; new water and wastewater facilities; sufficient stormwater drainage facilities; adequate wastewater facilities; and energy. The PEIR also determine that significant and unavoidable impacts would occur with regard to adequate water supplies and sufficient landfill capacity. Lastly, the PEIR determined that a less than significant impact with regard to solid waste regulations would occur.

2011 GPU PEIR Mitigation Measures

- USS -1.1** Participate in interjurisdictional reviews to gather information on and review and provide comments on plans of incorporated jurisdictions and public agencies in the region.

- USS -1.2** Implement and revise as necessary Board Policy I-84 to ensure adequate availability of sewer /sanitation service for development projects that require it. Also revise Board Policy I-78 to include additional criteria and regulatory requirements restricting the location of small wastewater treatment facilities.

- USS -1.3** Ensure County planning staff participation in the review of wastewater facility long range and capital improvement plans.

- USS -2.1** Revise Board Policy I-63 to minimize leapfrog development and to establish specific criteria for GPAs proposing expansion of areas designated village regional category. This is intended to limit unexpected demands for new water and wastewater facilities.
- USS -2.2** Perform CEQA review on privately initiated water and wastewater facilities and review and comment on water and wastewater projects undertaken by other public agencies to ensure that impacts are minimized and that projects are in conformance with County plans.
- USS -2.3** Implement, and revise as necessary, the Green Building Program to encourage project designs that incorporate water conservation measures, thereby reducing the potential demand for new water purveyors with the buildout of General Plan Update.
- USS -3.1** Amend the Subdivision Ordinance to add additional design requirements for subdivisions that encourage conservation oriented design. Also amend it to require new residential development to be integrated with existing neighborhoods by providing connected and continuous road, pathway/trail and recreation/open space networks. This will reduce scattered development footprints and increase pervious surfaces in site design, thereby minimizing the need for new stormwater drainage facilities.
- USS -3.2** Prepare Subdivision Design Guidelines that establish a process to identify significant resources on a project site, identify the best areas or development and create a conservation oriented design for both the project and open space areas.
- USS -3.3** Use the County Guidelines for Determining Significance for Surface Water Quality and Hydrology to identify adverse environmental effects on water quality.
- USS -3.4** Implement the LID handbook and establish LID standards for new development to minimize runoff and maximize infiltration.
- USS -3.5** Evaluate the environmental effects of all proposed stormwater drainage facilities and ensure that significant adverse effects are minimized and mitigated.
- USS -4.1** Review General Plan Amendments for consistency with the goals and policies of the General Plan. This shall include designating groundwater dependent areas with land use density/intensity that is consistent with the long-term sustainability of groundwater supplies; locating commercial, office, civic, and industrial development in villages, town centers or at transit nodes; and ensuring that adequate water supply is available for development projects that rely on imported water.
- USS -4.2** Implement, and revise as necessary, the County Green Building Program with incentives for development that is energy efficient and conserves

resources, including both groundwater and imported water.

- USS -4.3** Implement Policy I-84 requiring discretionary projects obtain water district commitment that water services are available. Also Implement and revise as necessary Board Policy G-15 to conserve water at County facilities.
- USS -4.4** Implement the Groundwater Ordinance to balance groundwater resources with new development and implement and revise as necessary the Watershed Ordinance to encourage the removal of invasive species to restore natural drainage systems, thereby improving water quality and surface water filtration. Also revise the Ordinance Relating to Water Efficient for Landscaping to further water conservation through the use of recycled water.
- USS -4.5** Use the County Guidelines for Determining Significance for Groundwater Resources, Surface Water Quality, and Hydrology to identify and minimize adverse environmental effects on groundwater resources.
- USS -4.6** Establish a water credits program between the County and the Borrego Water District to encourage an equitable allocation of water resources.
- USS -4.7** Coordinate with the San Diego County Water Authority and other water agencies to coordinate land use planning with water supply planning and support continued implementation and enhancement of water conservation programs.
- USS -6.1** Participate in interjurisdictional reviews to gather information on and provide comments on plans of incorporated jurisdictions and public agencies in the region. Also work with jurisdictions in the County to facilitate regulations to site recycling facilities.
- USS -6.2** Review all plans for large scale projects and planned developments to insure there is space allocation for on-site storage to separate recyclable solid waste.
- USS -6.3** Promote and enforce the Management of Solid Waste Ordinance requiring mandatory recycling. Evaluate the Zoning Ordinance and other County ordinances, codes and policies to allow the development of the most environmentally sound infrastructure for solid waste facilities including recycling, reuse and composting businesses. Also implement the Zoning Ordinance requirements for a Major Use Permit for new landfills to ensure the facilities are sited in accordance with the San Diego County IWMP.
- USS -6.4** Promote the use of Board Policy B-67 requiring the County to purchase products containing recycled and recyclable materials.
- USS -6.5** Regulate refuse hauling companies through County Franchise Hauler Agreement permits. Coordinate with solid waste facility operators to extend and/or expand existing landfill capacity by encouraging on-site materials

diversion options. Also develop incentives to encourage pilot projects with unincorporated area landfills to use anaerobic digesters to process organic materials currently being landfilled.

USS -6.6 Permit and regulate solid waste operators and closed solid waste disposal sites to ensure compliance with California Code of Regulations and Titles 14 and 27.

USS -6.7 Maintain and monitor inactive solid waste disposal sites to ensure compliance with all applicable environmental regulations. Also establish additional compatible uses for inactive solid waste sites, where possible, that generate cost-saving revenue and provide desirable community resources.

USS -6.8 Conduct recycling and composting public education programs for residents, schools, and businesses. Develop programs to assist farmers, residents, and businesses to divert organic materials. Also encourage the County and private contractors and developers to practice deconstruction and recycling of construction, demolition and land clearing debris.

USS -8.1 Implement, and revise as necessary, the County Green Building Program through incentives for development that is energy efficient and conserves resources.

USS -8.2 Revise Board Policy F-50 to strengthen the County's commitment and requirement to implement resource-efficient design and operations for County funded renovation and new building projects. Also revise Board Policy G-15 to require County facilities to comply with Leadership in Energy and Environmental Design (LEED) standards or other Green Building rating systems.

USS -8.3 Revise Board Policy G-16 to require the County to:

- Adhere to the same or higher standards it would require from the private sector when locating and designing facilities concerning environmental issues and sustainability
- Require government contractors to use low emission construction vehicles and equipment.

USS -8.4 Prepare a County Climate Change Action Plan with a baseline inventory of greenhouse gas emissions from all sources; greenhouse gas emissions reduction targets and deadlines, and enforceable greenhouse gas emissions reduction measures.

A. Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas,

or telecommunications facilities, the construction or relocation of which could cause significant environmental effects

Supplemental Analysis Required: The Project will include, but is not limited to, changes to the grading and clearing requirements, thresholds for permit requirements, and permit process. The Project will include evaluation of providing a ministerial permit process for grading and/or clearing for housing located in VMT Efficient or Infill Areas. Construction activities associated with the Ordinance change could result in landform modification or grading that would require the relocation or construction of new or expanded facilities. Construction or relocation of these facilities could result in significant environmental effects. This issue will be analyzed further in the SEIR.

B. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years

Supplemental Analysis Required: The Project will include, but is not limited to, changes to the grading and clearing requirements, thresholds for permit requirements, and permit process. The Project will include evaluation of providing a ministerial permit process for grading and/or clearing for housing located in VMT Efficient or Infill Areas. Construction activities associated with the Ordinance change could result in the use of water for activities, such as dust suppression. It is unknown at this time if sufficient water supplies would be available to serve the Project. This issue will be analyzed further in the SEIR.

C. Result in a determination by the waste water 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

Supplemental Analysis Required: The Project will include, but is not limited to, changes to the grading and clearing requirements, thresholds for permit requirements, and permit process. The Project will include evaluation of providing a ministerial permit process for grading and/or clearing for housing located in VMT Efficient or Infill Areas. Construction activities associated with the Ordinance Update could result in the use of wastewater. It is unknown at this time if a wastewater treatment facility would have adequate capacity to serve the Project's needs. This issue will be analyzed further in the SEIR.

D. Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals

Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR: Seven permitted active landfills with remaining capacity are in San Diego County. The County Department of Environmental Health and Quality's Local Enforcement Agency issues solid waste facility permits with concurrence from the California Integrated Waste Management Board under the authority of the California Public Resources Code (Sections 44001-44018) and California Code of Regulations Title 27, Division 2, Subdivision 1, Chapter 4 (Section 214404 et seq.), which serve as implementation programs to assist with capacity issues relating to solid waste disposal.

In addition, AB 341 requires cities and counties to implement recycling programs, reduce refuse at the source, and compost waste to achieve the established 75 percent diversion of solid waste from landfills.

The Project will include, but is not limited to, changes to the grading and clearing requirements, thresholds for permit requirements, and permit process. The Project will include evaluation of providing a ministerial permit process for grading and/or clearing for housing located in VMT Efficient or Infill Areas. The County's Construction and Demolition Debris Recycling Ordinance requires grading projects, excluding agricultural grading, to recycle or reuse 100 percent of excavated soils, trees, stumps, rocks, and vegetation. In addition, grading projects need to comply with the 2022 California Green Building Standards Code (CALGreen) recycling requirements. Diversion of recyclable waste generated by the Project would reduce the amount of waste disposed at local landfills. Therefore, the Project would not generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals. Impacts would be less than significant. This issue will not be analyzed further in the SEIR.

E. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste

Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR: Construction activities are subject to compliance with the 50 percent diversion of solid waste requirement pursuant to AB 939 and the 2022 CALGreen recycling requirements, which implement design and construction measures that act to reduce construction-related waste through material conservation measures and other construction-related efficiency measures. In addition, all construction activities associated with implementation of the Ordinance Update would be required to comply with the County's Construction and Demolition Debris Recycling Ordinance. Impacts would be less than significant. This issue will not be analyzed further in the SEIR.

XX. WILDFIRE – Since the previous EIR was certified or previous ND was adopted, are there any changes in the Project, changes in circumstances under which the Project is undertaken and/or "new information of substantial importance" that cause effects to utilities and service systems including: impairment of an adopted emergency response plan or emergency evacuation plan; exacerbation of wildfire risks due to slope, prevailing winds, or other factors; require the installation or maintenance of associated infrastructure that may exacerbate fire risk; or expose people or structure to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

YES	NO
<input checked="" type="checkbox"/>	<input type="checkbox"/>

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“Wildfire” was not an environmental impact area considered by the GPU PEIR because under the CEQA regulations at the time this impact category was not required. However, the PEIR did consider wildland fire and fire protection under the category Hazards and Hazardous Materials, refer to IX. Hazards and Hazardous Materials, above.

A. Substantially impair an adopted emergency response plan or emergency evacuation plan?

Supplemental Analysis Required: The Project will include, but is not limited to, changes to the grading and clearing requirements, thresholds for permit requirements, and permit process. The Project will include evaluation of providing a ministerial permit process for grading and/or clearing for housing located in VMT Efficient or Infill Areas. Implementation of the Project may result in construction activities that may require temporary full or partial lane closures. The full or partial lane closures could result in the redistribution of traffic along adjacent and surrounding roadways. As construction progresses, access for emergency vehicles could be impaired as result of reduced roadway widths (or capacity) and increased volumes of construction-related traffic or redistributed traffic. Construction could impair or physically interfere with adopted Emergency Response Plans or Emergency Evacuation Plans. This issue will be analyzed further in the SEIR.

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

Supplemental Analysis Required: Portions of the county are in a Very High Fire Hazard Safety Zone. The Project will include, but is not limited to, changes to the grading and clearing requirements, thresholds for permit requirements, and permit process. The Project will include evaluation of providing a ministerial permit process for grading and/or clearing for housing located in VMT Efficient or Infill Areas. Implementation of the Project may result in construction activities that may occur on sites that include flammable materials, such as brush, grass, or trees, which would have the potential to expose occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. This issue will be analyzed further in the SEIR.

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 to the environment

Supplemental Analysis Required: The Project will include, but is not limited to, changes to the grading and clearing requirements, thresholds for permit requirements, and permit process. The Project will include evaluation of providing a ministerial permit process for grading and/or clearing for housing located in VMT Efficient or Infill Areas. Implementation of the Project may result in construction activities and associated infrastructure (e.g., access roads) that could occur on undeveloped land, and potentially flammable materials,

such as brush, grass, or trees, could exacerbate fire risk or that may result in temporary or ongoing impacts to the environment. This issue will be analyzed further in the SEIR.

D. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes

Supplemental Analysis Required: The Project will include, but is not limited to, changes to the grading and clearing requirements, thresholds for permit requirements, and permit process. The Project will include evaluation of providing a ministerial permit process for grading and/or clearing for housing located in VMT Efficient or Infill Areas. Land-disturbing construction activities associated with the Project, such as vegetation clearing and grading of agricultural or residential properties, could result in localized alteration of drainage patterns and temporarily increase in erosion and sedimentation in the construction area. Temporary flooding could also result from such activities from temporary alterations of the drainage system (reducing its capacity of carrying runoff) or from the temporary creation of a sump condition due to grading. Alterations may temporarily result in increased erosion and siltation if flows were substantially increased or routed to facilities or channels without capacity to carry the additional flow. Construction activities could expose people or structures to significant risk associated with post-fire landslides, mudflows, and flooding. This issue will be analyzed further in the SEIR.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE: Since the previous EIR was certified or previous ND was adopted, are there any changes in the Project, changes in circumstances under which the Project is undertaken and/or "new information of substantial importance" that result in any mandatory finding of significance listed below?

Does the project degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?

YES NO

A. Degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or

eliminate important examples of the major periods of California history or prehistory

Supplemental Analysis Required: The Project will include, but is not limited to, changes to the grading and clearing requirements, thresholds for permit requirements, and permit process. The Project will include evaluation of providing a ministerial permit process for grading and/or clearing for housing located in VMT Efficient or Infill Areas. The Project may have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory. This issue will be analyzed further in the SEIR.

B. Impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)

Supplemental Analysis Required: A cumulative impact could occur for a given resource area if the Project were to result in an incrementally considerable contribution to a significant cumulative impact from past, present, or reasonably foreseeable future projects. As discussed in Sections I through XX, the Project could result in potentially significant impacts in several resource areas. Even issues that were found to be less than significant with implementation of the Project could contribute to a cumulatively significant impact. This issue will be analyzed further in the SEIR.

C. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly

Supplemental Analysis Required: Given the discussion provided in Sections I through XX, the Project could result in a potentially significant impact that could cause substantial adverse effects on human beings, either directly or indirectly. This issue will be analyzed further in the SEIR.

XXII. REFERENCES USED IN THE COMPLETION OF THE INITIAL STUDY CHECKLIST

All references to federal, state, and local regulation are available on the internet. For federal regulation, refer to <http://www4.law.cornell.edu/uscode/>. For state regulation, refer to <https://leginfo.legislature.ca.gov>. For County regulation, refer to www.amlegal.com. All other references are available upon request.

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