

Attachment A

AN ADDENDUM TO THE PREVIOUSLY CERTIFIED ENVIRONMENTAL IMPACT REPORT, LOG NO. 02-ZA-00 FOR THE COUNTY OF SAN DIEGO



County of San Diego

KATHLEEN FLANNERY
ACTING DIRECTOR

PLANNING & DEVELOPMENT SERVICES
5510 OVERLAND AVENUE, SUITE 310, SAN DIEGO, CA 92123
858) 505-6445 General • (858) 694-2705 Codes
(858) 565-5920 Building Services
www.SDCPDS.org

VINCE NICOLETTI
ACTING ASSISTANT DIRECTOR

AN ADDENDUM TO THE PREVIOUSLY CERTIFIED ENVIRONMENTAL IMPACT REPORT, LOG NO. 02-ZA-00 FOR THE COUNTY OF SAN DIEGO GENERAL PLAN UPDATE

FOR PURPOSES AND CONSIDERATION OF FINAL ENGINEERING FLEXIBILITY ZONING ORDINANCE AMENDMENT SUBDIVISION ORDINANCE AMENDMENT GRADING ORDINANCE AMENDMENT PDS2020-MISC-20-029

February 25, 2021

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 or none of the conditions described in Section 15162 or 15163 calling for the preparation of a subsequent or supplemental EIR or subsequent Negative Declaration have occurred.

Discussion:

There are some minor changes and additions, which need to be included in an Addendum to the previously certified Environmental Impact Report (EIR) to accurately cover the new project. The additions are underlined and deletions are struck out. The changes and additions consist of the following:

1. To the Project Numbers add PDS2020-MISC-20-029
2. To the first paragraph add as indicated: "The EIR for this project are comprised of this form along with the Environmental Review Update Checklist Form for Projects with a Previously Approved Environmental Document dated February 4, 2021 which includes the following forms attached."

- A. The previously Certified Environmental Impact Report, dated August 3, 2011;
- B. An Addendum to the previously certified Environmental Impact Report with an Environmental Review Update Checklist Form for Projects with a Previously Approved Environmental Document dated February 4, 2021.

Exhibit A

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

<https://www.sandiegocounty.gov/content/sdc/pds/gpupdate/environmental.html>

Exhibit B

**Environmental Review Update Checklist Form for projects
with Previously Approved Environmental Documents**

**For Purposes of Consideration of
Final Engineering Flexibility
PDS2020-MISC-20-029**



County of San Diego

KATHLEEN A. FLANNERY
ACTING DIRECTOR

PLANNING & DEVELOPMENT SERVICES
5510 OVERLAND AVENUE, SUITE 310, SAN DIEGO, CA 92123
858) 505-6445 General • (858) 694-2705 Codes
(858) 565-5920 Building Services
www.SDCPDS.org

VINCE NICOLETTI
ACTING ASSISTANT DIRECTOR

February 4, 2021

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

FOR PURPOSES OF CONSIDERATION OF FINAL ENGINEERING FLEXIBILITY; PDS2020-MISC-20-029

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 15164(e) to explain the rationale for determining whether any additional environmental documentation is needed for the subject discretionary action.

1. Background on the previously certified EIR:

A Program EIR for the County of San Diego's (County) General Plan Update, Environmental Review Number 02-ZA-00, State Clearing House Number 2002111067, was certified by the Board of Supervisors on August 3, 2011 (GPU EIR). The GPU EIR evaluated potentially significant effects for the following environmental areas of potential concern: 1) Aesthetics; 2) Agricultural Resources; 3) Air Quality; 4) Biological Resources; 5) Cultural And Paleontological Resources; 6) Geology And Soils; 7) Hazards and Hazardous Materials; 8) Hydrology and Water Quality; 9) Land Use and Planning; 10) Mineral Resources; 11) Noise; 12) Population and Housing; 13) Public Services; 14) Recreation; 15) Transportation and Traffic; 16) Utilities and Service Systems, and 17) Climate Change.

Of these seventeen environmental subject areas, it was determined that only Geology/Soils and Population/Housing would not involve potentially significant impacts. The remaining environmental issues evaluated included impacts that would be significant and unavoidable with the exception of the following four subject areas in which all impacts would be mitigated below a level of significance: Cultural and Paleontological Resources, Land Use and Planning, Recreation, and Climate Change. For those areas in which environmental impacts will remain significant and unavoidable, even with the implementation of mitigation measures,

overriding considerations exist which make the impacts acceptable. The GPU EIR is on file with the County Planning and Development Services Department.

2. Lead agency name and address:

County of San Diego, Planning & Development Services
5510 Overland Avenue, Suite 110
San Diego, CA 92123

- a. Contact: Ashley Smith, Project Manager
- b. Phone number: (619) 857-8012
- c. E-mail: ashley.smith2@sdcounty.ca.gov

3. Project applicant's name and address:

County of San Diego
Planning & Development Services
5510 Overland Ave., Suite 310
San Diego, CA 92123

4. Does the project for which a subsequent discretionary action is now proposed differ in any way from the previously approved project?

YES

☒

NO

☐

The project would amend the County Zoning Ordinance (Zoning Ordinance), County Subdivision Ordinance (Subdivision Ordinance), and County Grading Ordinance (Grading Ordinance) to allow project changes required to comply with changes in State or Federal regulatory requirements, without requiring a modification or revised map if specific findings are made (project). These project changes would not be counted toward the cumulative change if all of the following are met: 1) project change(s) do not result in a new or substantially increased significant impact in accordance with CEQA; 2) project change(s) do not result in a situation that would be detrimental to the health, safety, or welfare of the public; and 3) project change(s) do not result in the elimination of project features required to meet the County code requirements. Examples of project features required to meet the County code requirements that cannot be eliminated include, but are not limited to, the following: 1) elimination of a trail that provides a connection through the project that is needed for regional connectivity; 2) reduction in overall amount of parkland approved with the original project; 3) elimination of roads that are needed for emergency access, travel time, or to handle the traffic generated by the project; and 4) reduction of area needed for required water supply well or onsite wastewater treatment systems and reserve area.

The changes to the Zoning Ordinance, Subdivision Ordinance, and Grading Ordinance described above would not involve substantial changes in the magnitude of impacts identified in the GPU EIR. As explained in this addendum, none of the proposed changes require major revisions of the GPU EIR due to new significant effects or the substantial increase in the severity of previously identified effects. There are no substantial changes with respect to the circumstances under which the project is undertaken that require major revisions of the GPU EIR due to the involvement of new significant environmental effects or a substantial increase

in the severity of previously identified significant effects. Likewise, there is not 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 GPU EIR was certified that result in significant effects or more severe effects than the GPU EIR.

5. **SUBJECT AREAS DETERMINED TO HAVE NEW OR SUBSTANTIALLY MORE SEVERE SIGNIFICANT ENVIRONMENTAL EFFECTS COMPARED TO THOSE IDENTIFIED IN THE PREVIOUS ND OR EIR.** The subject areas checked below were determined to be new significant environmental effects or to be previously identified effects that have a substantial increase in severity either due to a change in project, change in circumstances or new information of substantial importance, as indicated by the checklist and discussion on the following pages.

☒ NONE

☐ Aesthetics

☐ Biological Resources

☐ Geology & Soils

☐ Hydrology & Water Quality

☐ Noise

☐ Recreation

☐ Utilities & Service Systems

☐ Agriculture and Forest Resources

☐ Cultural Resources

☐ Greenhouse Gas Emissions

☐ Land Use & Planning

☐ Population & Housing

☐ Transportation/Traffic

☐ Wildfire

☐ Air Quality

☐ Energy

☐ Hazards & Haz Materials

☐ Mineral Resources

☐ Public Services

☐ Tribal Cultural Resource

☐ 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 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 ND or 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 EIR is required.

February 4, 2021

Signature

Date

Ashley Smith

Printed Name

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.

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.

ENVIRONMENTAL REVIEW UPDATE CHECKLIST

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

☒

The GPU EIR identified impacts to scenic vistas, scenic resources, visual character or quality, and light and glare as potentially significant. Impacts to scenic vistas and resources were less than significant with mitigation; however, impacts to visual character or quality and light or glare were significant and unavoidable.

The project does not propose any development. The project would amend the Zoning Ordinance, Subdivision Ordinance, and Grading Ordinance to allow project changes required to comply with changes in State or Federal Regulatory requirements, without requiring a modification, a revised map, or counted toward the project cumulative change, if specific findings are made.

The Zoning Ordinance currently allows for project changes of up to 10%. The Subdivision Ordinance and Grading Ordinance currently allow minor project changes that are in substantial conformance to the parent permit. The project would allow for additional changes complying with regulatory requirements, but these changes would not require major revisions of the GPU EIR due to new significant environmental effects, an increase in severity of previously identified significant effects, or new information of substantial importance. This is because these changes would be minimal in nature. For example, future project changes that could be screened out from subsequent analysis include, but are not limited to, the following: minor alterations to a proposed road due to fire code requirements, minor changes to grading quantities due to required changes in Municipal Separate Storm Sewer System (MS4) best management practices (BMPs), American Disability Act (ADA) required parking or wheelchair access, California Building code requirements for "electric vehicle (EV) ready" parking spaces, or California Department of Fish and Wildlife (CDFW) and United States Fish and Wildlife Service biological resources enhancement requirements. Each of the above examples could result in a visual change in the environment but would not result in a substantial adverse effect on visual resources that would require major revisions of the GPU EIR.

In addition, in order for future projects to be screened out of subsequent analysis, specific findings are required which include CEQA conformance of no new or substantially increased significant impacts. Because the project would not result in significant adverse effects on visual resources, and future project changes would be required to meet specific findings including CEQA conformance, the project would not contribute to a cumulatively considerable effect on visual resources.

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

☒

The GPU EIR identified impacts to conversion of agricultural resources, land use conflicts and indirect conversion of agricultural resources as potentially significant. Land use conflicts was determined to be less than significant with mitigation; however, direct and indirect conversion of agricultural resources were determined to be significant and unavoidable.

The project does not propose any development. The project would amend the Zoning Ordinance, Subdivision Ordinance, and Grading Ordinance to allow project changes required to comply with changes in State or Federal Regulatory requirements, without requiring a modification, a revised map, or counted toward the project cumulative change, if specific findings are made.

Examples of future projects which may be exempt from subsequent analysis are provided in I. Aesthetics. The magnitude of land space required for these changes is minimal and would not constitute new information of substantial importance, a new significant environmental effect, or an increase in severity of previously identified significant effect, requiring major revisions of the GPU EIR.

In addition, in order for future project changes to be screened out of subsequent analysis, specific findings are required which include CEQA conformance of no new or substantially increased significant impacts. Because the project would not result in significant adverse effects on agriculture or forestry resources, and future project changes would be required to meet specific findings including CEQA, the project would not contribute to a cumulatively considerable effect on agriculture or forestry resources.

III. AIR QUALITY -- 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 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

☒

The GPU EIR identified impacts to air quality plans and from objectionable odors as less than significant. Impacts from air quality violations, non-attainment criteria pollutants and sensitive receptors were determined to be significant and unavoidable.

The project does not propose any development. Future project changes due to regulatory compliance would be exempt from subsequent analysis but would not result in a significant air quality impact beyond the GPU EIR. The future project changes would minimally expand upon existing or proposed permits but would not increase or change the intensity of the uses. The future project changes that would be exempt and not subject to subsequent analysis, would be required to conform with the County's General Plan Policies such as COS-14.8: Minimize Air Pollution and COS-14.10: Low-Emission Construction Vehicles and Equipment. As identified by the GPU EIR, these policies would require that development minimize land use conflicts that expose people to significant amounts of air pollutants, and require County contractors and encourage other developers to use low-emission construction vehicles and equipment to improve air quality and reduce GHG emissions. Therefore, the project would not constitute new information of substantial importance, a new significant environmental effect, or an increase in severity of previously identified significant effects, requiring major revisions of the GPU EIR.

In addition, in order for future project changes to be screened out of subsequent analysis, specific findings are required which include CEQA conformance of no new or substantially increased significant impacts. Because the project would not result in significant adverse effects on air quality, and future project changes would be required to meet specific findings including CEQA, the project would not contribute to a cumulatively considerable effect on air quality.

IV. BIOLOGICAL 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 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 or U.S. Fish and Wildlife Service; 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
☒

The GPU EIR identified potentially significant impacts to special status species, riparian habitat and other sensitive natural communities, federally protection wetlands and wildlife movement corridors. Federally protected wetlands were found to be less than significant with mitigation; however, special status species, riparian habitat and other sensitive natural communities, and wildlife movement corridors, were found to be significant and unavoidable. Local policies and ordinances, and habitat conservation plans and natural community conservation plans, were determined to be less than significant.

The project does not propose any development. The project would amend the Zoning Ordinance, Subdivision Ordinance, and Grading Ordinance to allow project changes required to comply with changes in State or Federal Regulatory requirements, without requiring a modification, a revised map, or counted toward the project cumulative change, if specific findings are made.

Examples of future project changes which may be exempt from subsequent analysis are provided in I. Aesthetics. The magnitude of land space required for these changes is minimal and would not constitute new information of substantial importance, a new significant environmental effect, or an increase in severity of previously identified significant effect, requiring major revisions of the GPU EIR. Future project changes would minimally expand upon existing or proposed permits but would not increase or change the intensity of the uses. In addition, some project changes may result in a reduction of impacts to biological resources, such as biological resources enhancements essential to comply with CDFW and USFWS requirements. Further, future project changes would be required to conform with the County's General Plan Policies such as Policy COS-1.9: Invasive Species, Policy COS-2.2: Habitat Protection through Site Design, and Policy COS-3.1: Wetland Protection. As identified by the GPU EIR, these policies require new development adjacent to biological preserves to use non-invasive plant in landscaping; require development to be sites in the least biologically sensitive areas and minimize the loss of natural habitat through site design; and require development to preserve existing natural wetland areas and associated transitional riparian and upland buffers and retain opportunities for enhancement.

In addition, in order for future projects to be screened out of subsequent analysis, specific findings are required which include CEQA conformance of no new or substantially increased significant impacts. Because the project would not result in significant adverse effects on biological resources, and future development would be required to meet specific findings including CEQA, the project would not contribute to a cumulatively considerable effect on biological resources.

V. 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 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

☒

The GPU EIR identified potentially significant impacts to historical resources, archaeological resources, paleontological resources, and human resources. All issue topics were determined to be less than significant with mitigation.

Examples of future project changes which may be exempt from subsequent analysis are provided in I. Aesthetics. The magnitude of land space required for these changes is minimal and would not constitute new information of substantial importance, a new significant environmental effect, or an increase in severity of previously identified significant effect, requiring major revisions of the GPU EIR. Future project changes would minimally expand upon existing or proposed permits but would

not increase or change the intensity of the uses. In addition, future project changes would be required to conform with the County's General Plan Policies such as Policy COS-7.1: Archaeological Protection, Policy COS-7.3: Archaeological Collections, Policy COS-9.1: Preservation, and Policy COS-7.5: Treatment of Human Remains. As identified by the GPU EIR, these policies require the preservation and treatment of important archaeological resources or collections in a culturally appropriate manner; require the salvage and preservation of unique paleontological resources when exposed to the elements during excavation, grading activities, or other development processes; and require human remains be treated with utmost dignity and respect and that the disposition and handling of human remains will be done in consultation with the Most Likely Descendant and under the requirements of the Federal, State and County Regulations.

In addition, in order for future projects to be screened out of subsequent analysis, specific findings are required which include CEQA conformance of no new or substantially increased significant impacts. Because the project would not result in significant adverse effects on cultural resources, and future development would be required to meet specific findings including CEQA, the project would not contribute to a cumulatively considerable effect on cultural resources.

VI. ENERGY USE – 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 energy including: wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation; and/or conflict with or obstruct a state or local plan for renewable energy or energy efficiently?

YES

☐

NO

☒

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

CEQA requires mitigation measures to reduce “wasteful, inefficient and unnecessary” energy usage (Public Resources Code Section 21100, subdivision [b][3]. Neither the law nor the State CEQA Guidelines establish criteria that defines wasteful, inefficient, or unnecessary use. Compliance with the California Code of Regulations 2019 Title 24 Part 6 Building Code would result in highly energy-efficient buildings.

The project does not propose any development. Future project changes due to regulatory compliance would be exempt from subsequent analysis but would not result in a significant energy impacts. The future project changes would minimally expand upon existing or proposed permits but

would not increase or change the intensity of the uses. The future project changes that would be exempt and not subject to subsequent analysis, would be required to conform with the County's General Plan Policies, as described above. Therefore, the project would not constitute new information of substantial importance, a new significant environmental effect, or an increase in severity of previously identified significant effects, requiring major revisions of the GPU EIR.

In addition, in order for future project changes to be screened out of subsequent analysis, specific findings are required which include CEQA conformance of no new or substantially increased significant impacts. Because the project would not result in significant adverse effects on energy use, and future project changes would be required to meet specific findings including CEQA, the project would not contribute to a cumulatively considerable effect on energy use.

VII. GEOLOGY AND SOILS -- 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 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

☒

The GPU EIR identified impacts to exposure to seismic-related hazards, soil erosion or topsoil loss, soil stability, expansive soils, wastewater disposal systems, and unique geologic features as less than significant. No mitigation was required.

No development is proposed currently as part of the project. Future subsequent projects could be hindered by a range of site development encumbrances such as location near an earthquake fault, located on unstable geological unit or soil, or located on expansive soils. However, future subsequent projects would be required to conform to the Seismic Requirements outlines within the California Building Code of Regulations, Title 24. In addition, the San Diego County Code Section 87.101 requires a soil compaction report with proposed foundation recommendation would be required to be approved before the approval of subsequent projects.

To reduce potential losses of topsoil, projects would also need to prepare Storm Water Pollution Prevention Plans (SWPPP) and Storm Water Quality Management Plans (SWQMP) for both construction and post construction phases. The SWPPP would be required to be prepared in accordance with order No. 2009-009-DWQ, National Pollutant Discharge Elimination System (NPDES) order CAS000002 Construction General Permit (CGP) adopted by the State Water Resources Control Board (SWRCB) on September 9, 2009, or the most recent version adopted. The SWQMP would be required to be prepared in accordance with the County of San Diego BMP Design Manual (2019) and San Diego County Regional Water Quality Control Board (SDRWQCB) Order No. R9-2013-0001 MS4 permit (2013), as adopted by the RWQCB on May 8, 2013, or most recent version adopted. The SWPPP and SWQMP specify and describe the implementation

process of all Best Management Practices (BMPs) that would address equipment operation and materials management, prevent the erosion process from occurring, and prevent sedimentation in any onside and downstream receiving waters. County staff would ensure that these plans are implemented as required. Moreover, future subsequent projects would be required to comply with the San Diego County Code of Regulations, Title 8, Zoning and Land Use Regulations, Division 7, Sections 87.414 and 87.417 for Drainage, Erosion Prevention, and planting. Compliance with these regulations minimizes the potential for water and wind erosion.

Therefore, compliance with County, State and Federal requirements and regulations would ensure the project would not have a substantial adverse effect from geology and soils (i.e. strong seismic ground shaking, liquefaction, unstable geological unit or soil, or expansive soils).

In addition, in order for future projects to be screened out of subsequent analysis, specific findings are required which include CEQA conformance of no new or substantially increased significant impacts. Because the project would not result in significant adverse effects on geology and soils, and future development would be required to meet specific findings including CEQA, the project would not contribute to a cumulatively considerable effect on geology and soils.

VIII. GREENHOUSE GAS EMISSIONS -- 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 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 emissions?

YES

☐

NO

☒

The GPU EIR identified compliance with AB 32 and potential effects of global climate change as potentially significant. Both issue topics were found to have a less than significant impact with mitigation but were found to have a significant cumulative contribution.

For background, in February 2018, the County Board of Supervisors adopted the County of San Diego Climate Action Plan (CAP) that included strategies and measures to reduce GHG emissions from the unincorporated County and County government operations. In December 2018, because of a lawsuit filed against the County and the CAP, the San Diego County Superior Court issued a writ ordering the approval of the CAP and associated SEIR be set aside. In June 2020, this decision was upheld by the California Court of Appeal, Fourth District following the County's appeal of the San Diego County Superior Court decision and County Board of Supervisors subsequently rescinded approvals of the CAP, SEIR and related approvals in September 2020. Through the holding of this decision, the County's CAP can no longer be considered the applicable plan in the unincorporated County for the purpose of reducing GHG emissions, and consistency with the CAP cannot be used as a determination of significance until such a time as it is reapproved in compliance with CEQA. However, GHG reduction strategies and measures included in the CAP continue to be implemented pending preparation of an updated CAP for consideration by the County Board of Supervisors.

Until such time that a Climate Action Plan is adopted by the County, subsequent projects implemented would be required to comply with applicable GPU mitigation measures and General

Plan Policies. This includes GPU mitigation measures CC-1.7, which states to incorporate the recommendations of the California Air Resources Board (CARB) related to climate change. Though CARB has not released a threshold of significance, CARB developed a 2017 Scoping Plan, which is intended to reduce GHG emissions to meet the statewide targets set forth in AB 32 and SB 32 and provides examples of local actions that can be implemented to support the State's climate goals.

The project does not propose any development. Future project changes due to regulatory compliance would be exempt from subsequent analysis but would not result in a significant greenhouse gas impact. The future project changes would minimally expand upon existing or proposed permits but would not increase or change the intensity of the uses. Therefore, the project would not constitute new information of substantial importance, a new significant environmental effect, or an increase in severity of previously identified significant effects, requiring major revisions of the GPU EIR.

In addition, in order for future project changes to be screened out of subsequent analysis, specific findings are required which include CEQA conformance of no new or substantially increased significant impacts. Because the project would not result in significant adverse effects on greenhouse gas emissions, and future project changes would be required to meet specific findings including CEQA, the project would not contribute to a cumulatively considerable effect on greenhouse gas emissions.

IX. HAZARDS AND HAZARDOUS MATERIALS -- 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 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

☒

The GPU EIR identified potentially significant impacts to public airports, private airports, emergency response and evacuation plans, and wildland fires. Public airports, private airports, and emergency response and evacuation plans were determined to result in less than significant impacts with mitigation. Wildland fires was found to have a significant and unavoidable impact. Transport, use, and disposal of hazardous materials, accidental release of hazardous materials, hazards to schools,

existing hazardous materials sites, and vectors, were all found to have less than significant impacts with no mitigation.

The project does not propose any development. Future project changes due to regulatory compliance would be exempt from subsequent analysis but would not result in a significant hazards or hazardous materials impact. The future project changes would minimally expand upon existing or proposed permits but would not increase or change the intensity of the uses. Therefore, the project would not constitute new information of substantial importance, a new significant environmental effect, or an increase in severity of previously identified significant effects, requiring major revisions of the GPU EIR.

In addition, in order for future project changes to be screened out of subsequent analysis, specific findings are required which include CEQA conformance of no new or substantially increased significant impacts. Because the project would not result in significant adverse effects on hazards or hazardous materials, and future project changes would be required to meet specific findings including CEQA, the project would not contribute to a cumulatively considerable effect on hazards or hazardous materials.

X. HYDROLOGY AND WATER QUALITY -- 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 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 storm water 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

☒

The GPU EIR identified potentially significant impacts to the following issue topics: water quality standards and requirements; groundwater supplies and recharge; erosion or siltation; flooding; exceed capacity of stormwater systems; housing within a 100-year flood hazard area; impeding or redirecting flood flows; dam inundation and flood hazards; and seiche, tsunami and mudflow hazards. All issue topics were found to be less than significant with mitigation for the exception of water quality standards and requirements, and groundwater supplies and recharge, which were found significant and unavoidable.

The project does not propose any development. Future project changes due to regulatory compliance would be exempt from subsequent analysis but would not result in a significant

hydrology or water quality impacts. The future project changes would minimally expand upon existing or proposed permits but would not increase or change the intensity of the uses. As stated under VII. Geology and Soils, SWPPs and SWQMPs would be required to be prepared for both construction and post construction phases. The purpose of the SWPPP is to prevent erosion and storm water pollution from entering into downstream receiving water bodies. The SWQMP is enforced during the post construction phase and requires projects to implement site design, source control and structural BMPs to prevent potential pollutants from entering storm water runoff during project operations. In addition, future project changes would be required to comply with the Guidelines for Determining Significance for both Water Quality and Hydrology as identified by the GPU EIR mitigation measure Hyd-1.5. Future project changes would also be required to conform to the County's General Plan Policies such as Policy S-10.5, Policy COS-5.1, and Policy S-9.3 which requires development to provide necessary on-site and off-site improvements to stormwater runoff and drainage facilities; restricts development in floodways and floodplains in accordance with policies in the Flood Hazards section of the Safety Element; and, requires development within mapped flood hazard areas to be sited and designed to minimize on-site and off-site hazards to health, safety, and property due to flooding. Therefore, the project would not constitute new information of substantial importance, a new significant environmental effect, or an increase in severity of previously identified significant effects, requiring major revisions of the GPU EIR.

In addition, in order for future project changes to be screened out of subsequent analysis, specific findings are required which include CEQA conformance of no new or substantially increased significant impacts. Because the project would not result in significant adverse effects on hazards or hazardous materials, and future project changes would be required to meet specific findings including CEQA, the project would not contribute to a cumulatively considerable effect on hazards or hazardous materials.

X. LAND USE AND PLANNING -- 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 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

☒

The GPU EIR identified potentially significant impacts related to physical division of an established community, which were found to be less than significant with the incorporation of mitigation measures. The GPU EIR also analyzed impacts related to conflicts with land use plans, policies, and regulations, as well as conflicts with Habitat Conservation Plans (HCPs) and Natural Community Conservation Planning (NCCPs) and were found to be less than significant.

The project does not propose any development. Future project changes due to regulatory compliance would be exempt from subsequent analysis but would not result in a significant land use and planning impacts. The future project changes would minimally expand upon existing or proposed permits but would not increase or change the intensity of the uses. Therefore, the project would not constitute new information of substantial importance, a new significant environmental effect, or an increase in severity of previously identified significant effects, requiring major revisions of the GPU EIR.

In addition, in order for future project changes to be screened out of subsequent analysis, specific findings are required which include CEQA conformance of no new or substantially increased significant impacts. Because the project would not result in significant adverse effects on land use and planning, and future project changes would be required to meet specific findings including CEQA, the project would not contribute to a cumulatively considerable effect on land use and planning.

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

☒

The GPU EIR identified significant and unavoidable impacts related to mineral resource availability and mineral resource recovery sites.

The project does not propose any development. The project would amend the Zoning Ordinance, Subdivision Ordinance, and Grading Ordinance to allow project changes required to comply with changes in State or Federal Regulatory requirements, without requiring a modification, a revised map, or counted toward the project cumulative change, if specific findings are made.

Examples of future project changes which may be exempt from subsequent analysis are provided in I. Aesthetics. The magnitude of land space required for these changes is minimal and would not constitute new information of substantial importance, a new significant environmental effect, or an increase in severity of previously identified significant effect, requiring major revisions of the GPU EIR. Future project changes would minimally expand upon existing or proposed permits but would not increase or change the intensity of the uses. In addition, future project changes would be proposed in locations where previous permits have been approved, and development exists. These developed land areas would be incompatible with future mining operations, likely creating a significant impact to neighboring properties for issues such as noise, air quality, and traffic, if a mining site was proposed. Therefore, implementation of the project is not expected to result in the loss of availability of a known mineral resource that would be of value since these land uses have already been lost due to incompatible land uses. Therefore, the project would not constitute new information of substantial importance, a new significant environmental effect, or an increase in severity of previously identified significant effects, requiring major revisions of the GPU EIR.

In addition, in order for future projects to be screened out of subsequent analysis, specific findings are required which include CEQA conformance of no new or substantially increased significant impacts. Because the project would not result in significant adverse effects on mineral resources, and future development would be required to meet specific findings including CEQA, the project would not contribute to a cumulatively considerable effect on mineral resources.

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

☒

The GPU EIR identified potentially significant impacts related to excessive noise levels, excessive groundborne vibration, permanent and temporary increases in ambient noise levels, and excessive noise exposure from a public or private airport. All impacts were determined to be less than significant with mitigation with the exception of impacts related to permanent increases in ambient noise levels, which remained significant and unavoidable.

The project does not propose any development. Future project changes due to regulatory compliance would be exempt from subsequent analysis but would not result in a significant land use and planning impacts. The future project changes would minimally expand upon existing or proposed permits but would not increase or change the intensity of the uses. In addition, future project changes would be required to conform to the County's General Plan Policies such as Policy LU-2.8: Mitigation of Development Impacts and Policy N-2.1: Development Impacts to Noise Sensitive Land Uses. As identified by the GPU EIR, these policies would require projects to minimize significant impacts to surrounding areas from uses or operations that cause excessive noise or vibrations, and would require an acoustical study where development may exceed thresholds and require mitigation for sensitive uses in compliance with the noise standards listed in Table N-2 in the Noise Element. Therefore, the project would not constitute new information of substantial importance, a new significant environmental effect, or an increase in severity of previously identified significant effects, requiring major revisions of the GPU EIR.

In addition, in order for future project changes to be screened out of subsequent analysis, specific findings are required which include CEQA conformance of no new or substantially increased significant impacts. Because the project would not result in significant adverse effects on noise, and future project changes would be required to meet specific findings including CEQA, the project would not contribute to a cumulatively considerable effect on noise.

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

☒

The GPU EIR found less than significant impacts related to population and housing, including population growth, displacement of housing, and displacement of people.

The project does not propose any development. Future project changes due to regulatory compliance would be exempt from subsequent analysis but would not result in a significant land use and planning impacts. The future project changes would minimally expand upon existing or proposed permits but would not increase or change the intensity of the uses. Therefore, the project would not constitute new information of substantial importance, a new significant environmental effect, or an increase in severity of previously identified significant effects, requiring major revisions of the GPU EIR.

In addition, in order for future project changes to be screened out of subsequent analysis, specific findings are required which include CEQA conformance of no new or substantially increased significant impacts. Because the project would not result in significant adverse effects on population and housing, and future project changes would be required to meet specific findings including CEQA, the project would not contribute to a cumulatively considerable effect on population and housing.

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
☐ ☒

The GPU EIR found potentially significant impacts to fire protection services, police protection services, school services, and other public services. All impacts were reduced to a level of less than significant with the incorporation of mitigation measures, with the exception of school services, which was found to remain significant and unavoidable.

The project does not propose any development. Future project changes due to regulatory compliance would be exempt from subsequent analysis but would not result in a significant land use and planning impacts. The future project changes would minimally expand upon existing or proposed permits but would not increase or change the intensity of the uses. Therefore, the project would not constitute new information of substantial importance, a new significant environmental effect, or an increase in severity of previously identified significant effects, requiring major revisions of the GPU EIR.

In addition, in order for future project changes to be screened out of subsequent analysis, specific findings are required which include CEQA conformance of no new or substantially increased significant impacts. Because the project would not result in significant adverse effects on public services, and future project changes would be required to meet specific findings including CEQA, the project would not contribute to a cumulatively considerable effect on public services.

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

☒

The GPU EIR found potentially significant impacts related to deterioration of parks and recreational facilities and construction of new recreational facilities. All impacts were reduced to a level of less than significant with the incorporation of mitigation measures.

The project does not propose any development. Future project changes due to regulatory compliance would be exempt from subsequent analysis but would not result in a significant land use and planning impacts. The future project changes would minimally expand upon existing or proposed permits but would not increase or change the intensity of the uses. Therefore, the project would not constitute new information of substantial importance, a new significant environmental effect, or an increase in severity of previously identified significant effects, requiring major revisions of the GPU EIR.

In addition, in order for future project changes to be screened out of subsequent analysis, specific findings are required which include CEQA conformance of no new or substantially increased significant impacts. Because the project would not result in significant adverse effects on recreation, and future project changes would be required to meet specific findings including CEQA, the project would not contribute to a cumulatively considerable effect on recreation.

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: an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system; exceedance, either individually or cumulatively, of a level of service standard established by the county congestion management agency for designated roads or highways; a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks; 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; inadequate parking capacity; and/or a conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?

YES

☐

NO

☒

The GPU EIR found potentially significant impacts to traffic and Level of Service (LOS) standards, rural road safety, emergency access, parking capacity, and alternative transportation. Emergency access, parking capacity, and alternative transportation were reduced to a less than significant level with the incorporation of mitigation measures, while traffic and LOS standards, and rural road safety, remained significant and unavoidable.

Senate Bill (SB) 743 was signed into law on September 27, 2013 and changed the way that public agencies are to evaluate transportation impacts under CEQA. In response, the Governor's Office of Planning and Research updated the CEQA guidelines and recommended that Vehicle Miles Travelled (VMT) be the primary metric for evaluation. When determining whether subsequent and

supplemental analyses are required under Public Resources Code section 21166, the lead agency should focus the inquiry on whether there are substantial changes in the project or circumstances that would require major revisions of the document, or if new information, which was not known and could not have been known at the time of becomes available.

The project does not propose any development. Future project changes due to regulatory compliance would be exempt from subsequent analysis but would not result in a significant land use and planning impacts. The future project changes would minimally expand upon existing or proposed permits but would not increase or change the intensity of the uses. In addition, future project changes would be required to comply with the County's Guidelines for Determining Significance Transportation and Traffic, as identified by the GPU EIR mitigation measure Tras-1.4, which has now been updated to the Transportation Study Guide. Therefore, the project would not constitute new information of substantial importance, a new significant environmental effect, or an increase in severity of previously identified significant effects, requiring major revisions of the GPU EIR.

In addition, in order for future project changes to be screened out of subsequent analysis, specific findings are required which include CEQA conformance of no new or substantially increased significant impacts. Because the project would not result in significant adverse effects on transportation, and future project changes would be required to meet specific findings including CEQA, the project would not contribute to a cumulatively considerable effect on transportation.

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 one or more effects to tribal cultural resources including: causing a change in the significance of a tribal cultural resource as defined in Public Resource Code §21074?

YES

☐

NO

☒

Since the GPU EIR (PDS2002-3910-02ZA001[ER], SCH#2002111067) was certified, there has been a change in circumstances. Assembly Bill 52 (AB-52) became effective on July 1, 2015. AB-52 requires that tribal cultural resources (TCR) be evaluated under CEQA. AB-52 consultation does not apply since the environmental document is not a Negative Declaration (ND), Mitigation Negative Declaration (MND), or Environmental Impact Report (EIR).

The project does not propose any development. Examples of future project changes which may be exempt from subsequent analysis are provided in I. Aesthetics. The magnitude of land space required for these changes is minimal and would not constitute new information of substantial importance, a new significant environmental effect, or an increase in severity of previously identified significant effect, requiring major revisions of the GPU EIR. Future project changes due to regulatory compliance would be exempt from subsequent analysis but would not result in a significant land use and planning impacts. The future project changes would minimally expand upon existing or proposed permits but would not increase or change the intensity of the uses. Therefore, the project would not constitute new information of substantial importance, a new significant environmental effect, or an increase in severity of previously identified significant effects, requiring major revisions of the GPU EIR.

In addition, in order for future project changes to be screened out of subsequent analysis, specific findings are required which include CEQA conformance of no new or substantially increased significant impacts. Because the project would not result in significant adverse effects on tribal cultural resources, and future project changes would be required to meet specific findings including CEQA, the project would not contribute to a cumulatively considerable effect on tribal cultural resources.

XVX. 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

☒

The GPU EIR identified potentially significant impacts to wastewater treatment requirements, water and wastewater treatment facilities, sufficient stormwater drainage facilities, water supplies, and landfill capacity. All impact areas were reduced to a less than significant level of significance with the incorporation of mitigation measures with the exception of water supplies and landfill capacity which were determined to remain significant and unavoidable.

The project does not propose any development. Future project changes due to regulatory compliance would be exempt from subsequent analysis but would not result in a significant land use and planning impacts. The future project changes would minimally expand upon existing or proposed permits but would not increase or change the intensity of the uses. Therefore, the project would not constitute new information of substantial importance, a new significant environmental effect, or an increase in severity of previously identified significant effects, requiring major revisions of the GPU EIR.

In addition, in order for future project changes to be screened out of subsequent analysis, specific findings are required which include CEQA conformance of no new or substantially increase significant impacts. Because the project would not result in significant adverse effects on utilities and services systems, and future project changes would be required to meet specific findings including CEQA, the project would not contribute to a cumulatively considerable effect on utilities and service systems.

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 wildfire for projects located in or near state responsibility areas or lands classified as very high fire hazard severity zones including:

substantially impair an adopted emergency response plan or emergency evacuation plan; 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; and/or 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?

YES

☐

NO

☒

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

The majority of the County is designated as a Very High and High Fire Hazard Severity Zone (FHSZ), except for the Desert and eastern Mountain Empire subregions, which are in the Moderate FHSZ. There are also areas of Moderate FHSZ and un-zoned areas in the more densely populated communities around the County. The project does not propose any development. Future project changes due to regulatory compliance would be exempt from subsequent analysis but would not result in significant land use and planning impacts. The future project changes would minimally expand upon existing or proposed permits but would not increase or change the intensity of the uses. In addition, future project changes would be required to comply with regulations relating to emergency access, water supply, and defensible space specified in the County Fire Code and Consolidated Fire Code. Implementation of these fire safety standards would occur prior to project approval, as identified by GPU mitigation measures Haz-4.2 and Haz-4.3. Therefore, the project would not constitute new information of substantial importance, a new significant environmental effect, or an increase in severity of previously identified significant effects, requiring major revisions of the GPU EIR.

In addition, in order for future project changes to be screened out of subsequent analysis, specific findings are required which include CEQA conformance of no new or substantially increase significant impacts. Because the project would not result in significant adverse effects on wildfire, and future project changes would be required to meet specific findings including CEQA, the project would not contribute to a cumulatively considerable effect on wildfire.

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

☒

Per the instructions for evaluating environmental impacts in this environmental document, the potential to 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 were considered in the response to each question in sections IV and V of this form. In addition to project specific impacts, this evaluation considered the projects potential for significant cumulative effects. There is no substantial evidence that there are biological or cultural resources that would be affected or associated with this project. Therefore, this project has been determined not to meet this Mandatory Finding of Significance.

Per the instructions for evaluating environmental impacts in this environmental document, the potential for adverse cumulative effects were considered in the response to each question in sections I through XX of this form. In addition to project specific impacts, this evaluation considered the projects potential for incremental effects that are cumulatively considerable. As a result of this evaluation, there is no substantial evidence that there are cumulative effects associated with this project. Therefore, this project has been determined not to meet this Mandatory Finding of Significance.

In the evaluation of environmental impacts in this environmental document, the potential for adverse direct or indirect impacts to human beings were considered in the response to certain questions in sections I. Aesthetics, III. Air Quality, VI. Geology and Soils, VIII. Hazards and Hazardous Materials, IX Hydrology and Water Quality, XII. Noise, XIII. Population and Housing, and XVI. Transportation and Traffic. As a result of this evaluation, there is no substantial evidence that there are adverse effects on human beings associated with this project. Therefore, this project has been determined not to meet this Mandatory Finding of Significance.

**XXII. REFERENCES USED IN THE COMPLETION OF THE ENVIRONMENTAL REVIEW
UPDATE CHECKLIST FORM**

California Department of Fish and Wildlife. Fish and Wildlife Code, Section 1600 *et. seq.*

California Environmental Quality Act, CEQA Guidelines

California Environmental Quality Act. 2001. California Code of Regulations, Title 14, Chapter 3, Section 15382.

County Code of Regulatory Ordinances, Title 3, Division 5, Chapter 3

County of San Diego General Plan, 2011.

County of San Diego General Plan Final Program EIR, certified on August 3, 2011.

County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements for Agricultural Resources, approved March 19, 2007.

County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements for Air Quality, approved March 19, 2007

County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements for Biological Resources, approved September 15, 2010

County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements for Cultural Resources: Archaeological and Historical Resources, approved December 5, 2007

County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements for Geologic Hazards, approved July 30, 2007

County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements for Mineral Resources, approved July 30, 2008

County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements for Noise, approved March 19, 2007

County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements for Transportation and Traffic, approved August 24, 2011

County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements for Vectors, approved January 15, 2009

County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements for Visual Resources, approved July 30, 2007

County of San Diego Guidelines for Determining Significance and Report Format and Content

Requirements for Wildland Fire and Fire Protection, approved August 31, 2010

County of San Diego Zoning Ordinance

County of San Diego. Resource Protection Ordinance, Article II (16-17). October 10, 1991

Water Quality Control Plan for the San Diego Basin (9), California Regional Water Quality Control Board, San Diego Region