



County of San Diego

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KATHLEEN FLANNERY
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February 13, 2020

CEQA Initial Study - Environmental Checklist Form (Based on the State CEQA Guidelines, Appendix G)

1. Title; Project Number(s); Environmental Log Number:

Valley Center Community Plan Update, PDS2018-GPA-18-009, PDS2019-ER-19-00-003

2. Lead agency name and address:
County of San Diego, Planning & Development Services
5510 Overland Avenue, Suite 110
San Diego, CA 92123-1239
3. a. Contact Robert Hingtgen, Environmental Coordinator
b. Phone number: (858) 694-3712
c. E-mail: Robert.Hingtgen@sdcounty.ca.gov.

4. Project location:

Valley Center is an unincorporated community of the county of San Diego. The Valley Center Community Plan Area (CPA) is comprised of approximately 94 square miles in the unincorporated area of northern San Diego County. The Valley Center CPA is bordered by the North County Metro Subregional Plan area including the Hidden Meadows community, and the city of Escondido on the south, the Interstate 15 (I-15) freeway and the Bonsall Community Plan Area on the west, and the Pala/Pauma Subregional Plan area on the north and east.

The primary access into the community of Valley Center is via Valley Center Road (S-6), which serves as the main linkage between the city of Escondido and Valley Center. I-15 borders the western portion of the CPA; however, the freeway does not lie within its boundaries.

Changes to General Plan land use designations and zoning are anticipated to cover a maximum of 1,500 acres within five specific subareas of the Valley Center CPA that will be determined through the planning and public outreach process.

The Valley Center CPA is characterized by its unique topographic features, its agricultural activities and its predominance of estate residential development. The rural character of the community is defined by the low population density and the prevalence of large areas of natural and agricultural open space.

5. Project Applicant name and address:

County of San Diego, Planning & Development Services
5510 Overland Avenue, Suite 310
San Diego, CA 92123-1239

6. General Plan

| | |
|------------------------|---------------|
| Community Plan: | Valley Center |
| Land Use Designation: | Various |
| Density: | Various |
| Floor Area Ratio (FAR) | Various |

7. Zoning

| | |
|--------------------------|---------|
| Use Regulation: | Various |
| Minimum Lot Size: | Various |
| Special Area Regulation: | Various |

8. Description of project:

The proposed project includes a comprehensive update to the Valley Center Community Plan and the Valley Center Design Guidelines.

The Valley Center Community Plan Update (CPU) comprises an update and refinement of the current plan's goals and policies to reflect the character of Valley Center and guide growth and development. The update to the Design Guidelines for Valley Center will update site design requirements for properties subject to design review. An infrastructure study and market feasibility analysis will be completed as part of the project in order to inform proposed amendments to the Community Plan, as well as identify an implementation plan that will organize and prioritize potential projects, strategies and actions designed to implement the Community Plan's vision.

Based on planning and constraints analysis, community input, and additional considerations, the CPU is anticipated to set forth changes in land use designations, zoning designations, and mobility element alignments. The project will refine the land use patterns established by the 2011 County of San Diego General Plan Update (GPU; 2011a) and apply the patterns to the Valley Center CPA. At this time, the County anticipates that changes to land use designations (including allowable density and intensity) and associated zoning classifications will cover a maximum area of 1,500 acres within five specific subareas of the CPA. The locations of subareas and land use alternatives for subareas will be determined after the initial phases of the public outreach process for the project. The CPU will evaluate topics such as land use, mobility, conservation/open space, housing, safety, and noise. The CPU project itself

would not involve permitting for any specific development project that would involve physical impacts to the environment. However, it is reasonably foreseeable that future individual projects that are implemented consistent with the CPU could result in physical impacts on the environment.

The CPU will require a Supplemental Environmental Impact Report (SEIR) that will tier from the General Plan Update Program Environmental Impact Report (GPU PEIR). This SEIR will use information from the GPU PEIR as well as provide more current and specific analyses for the Valley Center CPA. The SEIR will be programmatic in nature in that it will analyze the reasonably foreseeable physical impacts to the environment from the changes to the Community Plan. For example, changes to land use densities could result in an increase or decrease in impacts that were previously analyzed in the GPU PEIR. It should be noted that the project itself does not propose any specific development project that would result in physical impacts on the environment.

The SEIR will establish updated existing conditions to reflect changes that have occurred affecting Valley Center since adoption of the GPU PEIR. Most notably, since adoption of the GPU PEIR, several General Plan (Clean-up) Amendments have been approved, as detailed in Table 1. These changes will be considered as part of the new land use baseline condition for purposes of the SEIR. While components of the CPU are still being developed, the CPU will be guided by and must remain consistent with the goals, policies, and planning concepts identified in the County General Plan and other relevant County plans and programs.

| Table 1 | |
|--|--|
| Valley Center General Plan Amendments and/or Rezones adopted since the GPU PEIR | |
| Project | Description of Changes |
| 2013 General Plan Clean-Up General Plan Amendment and Rezone; GPA 12-007; REZ 13-002 | <p>This GPA and rezone included a land use and zoning change in Valley Center (among other areas), specifically:</p> <p>VC102 approved a change to the land use designations over 910 acres spanning 12 parcels (APNs: 12823046, 12823047, 12836022, 12851005, 12851006, 12851007, 12852108, 12852110, 12904004, 12920006, 12932001, and 12932003) that were sold to Caltrans for use as mitigation land. The project changed the Semi-Rural 2 (SR-2) and Rural Lands 20 (RL-20) land use designations to Open Space-Conservation (OS-C), which reduced development potential in this area by up to 330 units based on the most intensive GP land use designation analyzed. The parcels are located approximately three miles east of I-15 in northwest Valley Center.</p> <p>These changes were approved with an Addendum dated January 24, 2014, with no new impacts identified. Additional documentation available at: https://www.sandiegocounty.gov/content/sdc/pds/advance/2013gpclean-up.html. VC102 detail available at: https://www.sandiegocounty.gov/content/dam/sdc/pds/advance/2013_GP_Clean-up/bos/attchb1.pdf</p> |
| 2015 General Plan Clean-Up General Plan Amendment and Rezone; GPA 14-001; REZ 14-001 | <p>This GPA and Rezone included a land use and zoning change in Valley Center (among other areas), specifically:</p> <p>VC201 included a change to the land use designation for a one-acre parcel (APN 1851431600) at the intersection of Canyon Road and Valley Center Road; inside the County Water Authority boundary. The Planning Commission/</p> |

| Table 1 | |
|---|--|
| Valley Center General Plan Amendments and/or Rezones adopted since the GPU PEIR | |
| Project | Description of Changes |
| | <p>Community Planning Group (CPG) recommendation was adopted which included a land use designation change from SR-2 to General Commercial (GC) and a zoning change from Rural Residential (RR) to General Commercial/Residential (C34).</p> <p>This project also included edits to the Valley Center Community Plan text to three commercial policies of the Valley Center Community Plan, which would allow exceptions for those parcels zoned commercial in July 2011 and rezoned to non-commercial zoning with the adoption of the General Plan Update in August 2011.</p> |
| <p>2017 General Plan Clean-Up General Plan Amendment and Rezone; GPA 16-001; REZ 16-001</p> | <p>This GPA and Rezone included a land use and zoning change in Valley Center (among other areas), specifically:</p> <p>VC304 included a change to the land use designation for two parcels totaling 148 acres north of the intersection of Lilac Road and Valley Center Road because the land was purchased by the Department of Parks and Recreation in order to add lands to the Keys Creek Preserve. The land use designation was changed from SR-2 to OS-C, which reduced development potential in this area by up to 39 units. Land uses are intended for passive recreation and open space.</p> |
| <p>2019 General Plan Clean-Up General Plan Amendment and Rezone; PDS2018-GPA 18-006; PDS2019-REZ 19-003</p> | <p>This GPA and Rezone included several land use and zoning changes in Valley Center (among other areas), specifically:</p> <p>VC401 included a change to the land use designation for two parcels totaling 78.08 acres east of North Lake Wohlford Road near Hellhole Canyon Preserve (APNs 19808010 and 18908011) because the land was purchased by the Department of Parks and Recreation in order to add lands to the Hellhole Canyon Preserve. The land use designation was changed from Rural Lands 40 (RL-40) to OS-C and zoning was changed from A70 to S80.</p> <p>VC402 included a change to the land use designation for one parcel totaling 42.83 acres northeast of Lilac Road and on Keys Creek Preserve (APN 18520133) because the land was purchased by the Department of Parks and Recreation in order to add lands to the Keys Creek Preserve. The land use designation was changed from SR-2 to OS-C and zoning was changed from A70/RR to S80.</p> <p>VC404 included a change to the land use designations for three parcels totaling 43.49 acres South of Vesper Road, north of Valley Center Road, and west of Mactan Road (APNs 18829070, 18829071, and 18829014) because the land was acquired by the Valley Center Parks Recreation Special District for an active park (Star Valley Park). The land use designation was changed from Semi-Rural 4 (SR-4) to Open Space-Recreation (OS-R) and zoning was changed from A70 to S80.</p> <p>The net change in residential development potential with these land use changes was a reduction in 29 potential single-family residential units.</p> |

9. Surrounding land uses and setting (Briefly describe the project's surroundings):

The Valley Center CPA consists of approximately 55,200 acres of land located in northern San Diego County. The CPA is bordered by the community of Fallbrook to the northwest, Pala/Pauma Valley Subregion to the north and east, the community of Bonsall to the west, and the North County Metropolitan Subregion to the south. Primary access into the CPA is provided by Valley Center Road (S6), which also serves as the main connection between the City of Escondido and Valley Center. I-15 borders the western portion of the CPA; however, the freeway does not lie within its boundaries.

The CPA is comprised of several distinct geographic areas that include the Central Basin area, the Lilac area located east of I-15, the Old Castle/Castle Creek area located east of I-15, and the Hellhole Canyon/Paradise Mountain area located in the southeastern corner of the CPA. Approximately 2,900 acres of the CPA are under the tribal ownership of the Rincon Reservation in the east and the San Pasqual Reservation in the south. The Pala Reservation abuts the northern CPA boundary located north of the Weaver Mountain. Valley Center's residential development pattern consists primarily of low density residential lots located on parcels that are two acres or larger that are dispersed around the northern and southern town center areas. There are two mobile home park developments within the CPA: Skyline Ranch Country Club and Lake Hideaway. Currently there are two developed specific plans in Valley Center: Castle Creek Country Club and Woods Valley Ranch. Commercial land uses are primarily concentrated within the northern and southern town center areas, located at the intersections of Valley Center Road and Cole Grade Road, and Valley Center Road and Woods Valley Road, respectively. There are a few scattered commercial businesses located outside of the town centers. Industrial land uses are concentrated in the northern town center area, located south of Valley Center Road.

The CPA is characterized by unique topographic features that include numerous valleys and ridgelines, hillsides with granite boulder outcroppings, and stands of live oak and Englemann oak. Gentle rolling hillsides eventually give way to steep, rugged terrain, especially in the outlying areas. Moosa Canyon Creek and its corresponding floodplain traverse the CPA in the southwest, while Keys Creek and its floodplain bisect the northwestern and central portion of the plan area. Agriculture is an important component to the local and regional economy of the CPA. Local agricultural crops include avocados, citrus, persimmons and specialty ornamental crops such as cut flowers and nursery plants. Agricultural operations are concentrated in the northern and western portions of the CPA but are also found throughout Valley Center.

10. Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement):

No outside agency approvals would be required for the CPU. The project would require approval of the following actions by the Board of Supervisors:

| Permit Type/Action | Agency |
|---------------------------|---------------------|
| General Plan Amendment | County of San Diego |
| Rezone | County of San Diego |

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

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 to reduce the potential for delay and conflict in the environmental review process (see Public Resources Code §21083.3.2). Information is also available from the Native American Heritage Commission’s Sacred Lands File per Public Resources Code §5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code §21082.3(e) contains provisions specific to confidentiality.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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.

- 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
- Wildfire
- Air Quality
- Energy
- Hazards & Hazardous Materials
- Mineral Resources
- Public Services
- Tribal Cultural Resources
- Mandatory Findings of Significance

DETERMINATION (To be completed by the Lead Agency)

On the basis of this initial evaluation:

- On the basis of this Initial Study, Planning & Development Services finds that the proposed project **COULD NOT** have a significant effect on the environment, and a **NEGATIVE DECLARATION** will be prepared.
- On the basis of this Initial Study, Planning & Development Services finds that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A **MITIGATED NEGATIVE DECLARATION** will be prepared.
- On the basis of this Initial Study, Planning & Development Services finds that the proposed project **MAY** have a significant effect on the environment, and a **SUPPLEMENTAL ENVIRONMENTAL IMPACT REPORT** is required.



Signature

February 13, 2020

Date

Robert Hingtgen

Printed Name

Environmental Coordinator

Title

INSTRUCTIONS ON EVALUATION OF ENVIRONMENTAL IMPACTS

1. A brief explanation is required for all answers except “No Impact” answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A “No Impact” answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
2. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, Less Than Significant With Mitigation Incorporated, or less than significant. “Potentially Significant Impact” is appropriate if there is substantial evidence that an effect may be significant. If there are one or more “Potentially Significant Impact” entries when the determination is made, an EIR is required.
4. “Less Than Significant With Mitigation Incorporated” applies where the incorporation of mitigation measures has reduced an effect from “Potentially Significant Impact” to a “Less Than Significant Impact.” The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level.
5. Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
 - a) Earlier Analysis Used. Identify and state where they are available for review.
 - b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c) Mitigation Measures. For effects that are “Less Than Significant With Mitigation Incorporated,” describe the mitigation measures that were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
7. The explanation of each issue should identify:
 - a) The significance criteria or threshold, if any, used to evaluate each question; and
 - b) The mitigation measure identified, if any, to reduce the impact to less than significance

I. AESTHETICS

Except as provided in Public Resources Code Section 21099, 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?

YES

NO

Would the project:

a) Have a substantial adverse effect on a scenic vista?

- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

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

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

Potentially Significant Impact: The GPU PEIR determined that future development would have the potential to result in the obstruction, interruption, or detraction of a scenic vista. However, the GPU PEIR determined that implementation of proposed GPU policies and mitigation measures, as well as compliance with the Resource Protection Ordinance (RPO) and County Zoning Ordinance, would mitigate direct and cumulative impacts to scenic vistas to a level less than significant.

Certain areas in the County have been designated as Resource Conservation Areas (RCAs) for the purposes of informing future planning decisions. RCAs 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. According to the GPU, the following RCAs within the Valley Center CPA are considered valuable because of visual resources:

- **Valley Center Ridge.** This scenic, steep, high ridge contains a diversity of oak woodlands and large growth chaparral that provides habitat for wildlife.
- **Chaparral Ridge.** This area includes a large, scenic rock slab north of Woods Valley Road.
- **Keys Creek.** This is a long, narrow riparian and oak woodland-lined stream bottom that provides high-quality wildlife habitat and is a scenic community resource.

The project would update and refine the goals and policies of the existing Valley Center Community Plan to reflect the character of Valley Center and to guide future growth and development. This update is anticipated to include changes to General Plan land use designations and zoning on up to 1,500 acres in five subareas that will be identified through the public outreach process. The project may also include the designation of additional scenic vistas to those detailed previously. Subsequent development activity that may be implemented may result in the obstruction, interruption, or detracting of a scenic vista. Therefore, the proposed project could result in a potentially significant impact on scenic vistas, and further discussion in the SEIR is warranted.

b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

State scenic highways refer to those highways that are officially designated by the California Department of Transportation (Caltrans) as scenic ([Caltrans - California Scenic Highway Program](#)). Generally, the area defined within a State scenic highway is the land adjacent to and visible from the vehicular right-of-way. The dimension of a scenic highway is usually identified using a motorist's line of vision, but a reasonable boundary is selected when the view extends to the distant horizon. The scenic highway corridor extends to the visual limits of the landscape abutting the scenic highway.

No Impact: The GPU PEIR determined that future development would result in potentially significant direct and cumulative impacts related to scenic resources. However, the GPU PEIR determined that incorporation of General Plan policies and mitigation measures, as well as compliance with the County's RPO and County Zoning Ordinance, would mitigate direct and cumulative impacts to scenic resources to a level less than significant.

No designated State Scenic Highways are located within the Valley Center CPA or the vicinity. Therefore, the proposed project would not affect views of scenic resources from a State Scenic Highway. No impact would occur and further discussion in the SEIR is not warranted.

c) Substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly

accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

- | | | | |
|-------------------------------------|--|--------------------------|------------------------------|
| <input checked="" type="checkbox"/> | Potentially Significant Impact | <input type="checkbox"/> | Less than Significant Impact |
| <input type="checkbox"/> | Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> | No Impact |

Discussion/Explanation:

Potentially Significant Impact: The GPU PEIR determined that future development would result in potentially significant direct and cumulative impacts associated with the changes to the existing visual character or quality of the community. While implementation of General Plan policies and mitigation measures would reduce direct and cumulative impacts related to visual character or quality, impacts would not be fully mitigated and would remain significant and unavoidable.

The GPU characterized Valley Center as a scenic, rural community with a combination of agricultural uses, riparian valleys, open space and rolling hills scattered throughout the plan area. Although urbanization has greatly diminished agricultural uses in other areas of the County, Valley Center has maintained its rural identity. A rural residential pattern of development, historically dependent upon septic systems, with scattered agricultural and livestock uses predominates the valley. Two-lane roads, many of which are bordered with oak canopies, support the circulation system. The residents of Valley Center consider their community to be one of the few places where one can enjoy a scenic natural environment and climate, while at the same time live within a reasonable distance to areas for employment and other regional urban services. The rural character of the community has retained a dark nighttime sky which is considered an important resource due to the proximity of the Palomar Mountain Observatory (GPU PEIR, Section 2.1.1.5).

The County Scenic Highway System was originally intended to serve as a master plan for official State Scenic Highway designations. The County's Scenic Highway System Priority List serves as the basis for initiating specific corridor studies.

Criteria for establishing the County Scenic Highway System Priority List includes:

- Routes traversing and providing access to major recreation, scenic or historic resources;
- Routes traversing lands under the jurisdiction of public agencies;
- Routes supported by significant local community interest; and
- Routes offering unique opportunities for the protection and enhancement of scenic recreational and historical resources.

Projects meeting three or more of the above criteria are classified as first priority projects and are the highest priority for corridor studies. Routes meeting only two of the above criteria are classified as second priority projects. All other projects are classified as third priority. Only a handful of corridor studies have been initiated due to lack of funding and no routes have been officially designated as a County Scenic Highway. Currently, the list serves more as a source for identifying resources than as a way to implement the scenic highways program. Figure C-5

of the General Plan Conservation and Open Space Element identifies roads within the Valley Center CPA that are part of the County Scenic Highway System Priority List. These roads include the following:

- Lilac Road and Valley Center Road between two points along State Route 76 (SR-76)
- Lake Wohlford Road from Valley Center Road east (Escondido city limits) to Valley Center Road (excluding portion within city of Escondido)
- Vista Way, Gopher Canyon, and Old Castle Road from Vista city limits north and east to Lilac Road.

The GPU approved land uses within the Valley Center CPA including commercial, industrial, and higher density residential development in the town center, surrounded by semi-rural residential development, with rural uses closer to the CPA boundaries. While Design Review Guidelines would help to maintain the character and identify of the community, the GPU PEIR determined that village residential and commercial uses proposed in the town center would likely result in an increase in development intensity and density.

Implementation of the CPU could increase residential density and/or commercial/industrial intensity beyond that identified in the GPU PEIR, which could further alter the existing visual character or quality of public views within Valley Center. Furthermore, this potential increase in residential density and/or commercial/industrial intensity could further impact scenic resources through changes to the visual environment affecting the valued visual character or image of the community, particularly along roads on the County Scenic Highway Priority List, or other areas of localized importance to the community. Therefore, the proposed project could result in a potentially significant impact, and further discussion in the SEIR is warranted.

d) Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?

- | | | | |
|-------------------------------------|--|--------------------------|------------------------------|
| <input checked="" type="checkbox"/> | Potentially Significant Impact | <input type="checkbox"/> | Less than Significant Impact |
| <input type="checkbox"/> | Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> | No Impact |

Discussion/Explanation:

Potentially Significant Impact: The GPU PEIR determined that future development would result in potentially significant direct and cumulative impacts associated with light and glare. While implementation of General Plan policies and mitigation measures would reduce direct and cumulative impacts related to light and glare, impacts would not be fully mitigated and would remain significant and unavoidable.

The County adopted the Light Pollution Code (LPC), or the Dark Sky Ordinance, in order “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 due to its proximity to the observatories, including limits on decorative lighting.

Valley Center is located southwest of the Palomar Observatory, and the majority of land within the Valley Center CPA is located within Zone A (see Figure 2.1-8 of the GPU PEIR). As a result, the dark night sky within the majority of the Valley Center CPA is considered an important visual resource. Therefore, subsequent projects implemented in accordance with the proposed project could generate new significant impacts related to light or glare, and further discussion in the SEIR is warranted.

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?

YES NO

Would the project:

- a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide or local Importance (Important Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, or other agricultural resources, to non-agricultural use?

Potentially Significant Impact Less than Significant Impact
 Less Than Significant With Mitigation Incorporated No Impact

Discussion/Explanation:

Potentially Significant Impact: The GPU PEIR determined that future development would result in potentially significant direct and cumulative impacts associated with the conversion of agricultural resources. While implementation of General Plan policies and mitigation measures would reduce direct and cumulative impacts related to the conversion of agricultural resources, impacts would not be fully mitigated and would remain significant and unavoidable.

The GPU PEIR separated agricultural resources into two commodity categories: grazing lands or croplands. The grazing lands category is divided into two separate agricultural land use types: grazing lands and field crops. The croplands category divided into three separate agricultural land use types: intensive agriculture, orchards and vineyards, and truck crops. According to the GPU PEIR, the Valley Center CPA contains 7,697 acres of grazing lands and 26,506 acres of cropland (see Table 2.2-3 of the GPU PEIR).

The SEIR will evaluate potential impacts associated with the conversion of agricultural resources based on Farmland Mapping and Monitoring Program categories of Prime Farmland, Unique Farmland, and Farmland of Statewide or Local Importance (Important Farmland) in addition to other available data sources. Implementation of the CPU could increase density beyond that identified in the GPU PEIR, which could impact areas designated as Important Farmland beyond what may occur under the land use pattern evaluated in the GPU PEIR. Therefore, the proposed project could result in a potentially significant impact, and further discussion in the SEIR is warranted.

b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?

- | | | | |
|-------------------------------------|--|--------------------------|------------------------------|
| <input checked="" type="checkbox"/> | Potentially Significant Impact | <input type="checkbox"/> | Less than Significant Impact |
| <input type="checkbox"/> | Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> | No Impact |

Discussion/Explanation:

Potentially Significant Impact: The GPU PEIR determined that future development would result in potentially significant direct impacts related to conflicts with existing zoning for agricultural use or Williamson Act contract land. However, the GPU PEIR determined that incorporation of General Plan policies and mitigation measures would mitigate direct impacts to conflicts with existing zoning for agricultural use or Williamson Act contract land to a level less than significant.

The GPU PEIR identified that the Valley Center CPA contains 37,924 acres of land zoned as A70 Limited Agriculture and 4,470 zoned as A72 General Agriculture (see Table 2.2-9 of the GPU PEIR), 7,290 acres of land designated as agricultural preserves, and 3,566 acres of land protected under Williamson Act Contracts (see Table 2.2-10 of the GPU PEIR). Additionally, since adoption of the GPU PEIR, the County has adopted a Purchase of Agricultural Conservation Easements (PACE) program which is an agricultural conservation easement program that allows willing agricultural property owners to be compensated for placing a perpetual easement on their property that limits future uses to agriculture. Approximately 282 acres of land are enrolled in the PACE program in Valley Center. Implementation of the CPU could increase residential density and/or commercial/industrial intensity beyond that identified in the GPU PEIR, which could result in additional conflicts with existing zoning for agricultural use, Williamson Act contract land, or lands preserved under PACE. Therefore, the proposed project could result in a potentially significant impact, and further discussion in the SEIR is warranted.

c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), or timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?

- | | | | |
|-------------------------------------|--|--------------------------|------------------------------|
| <input checked="" type="checkbox"/> | Potentially Significant Impact | <input type="checkbox"/> | Less than Significant Impact |
| <input type="checkbox"/> | Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> | No Impact |

Discussion/Explanation:

Potentially Significant Impact: Since certification of the GPU PEIR, the CEQA Guidelines Appendix G Environmental Checklist Form regarding agricultural resources was expanded to include impacts on forestlands and timberlands. Because the component was added to CEQA Appendix G after adoption of the GPU PEIR, potential impacts on forestlands and timberlands were not analyzed in the GPU PEIR.

Public Resources Code Section 12220(g) defines forestland 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. Public Resources Code section 4526 defines timberland as land, other than land owned by the federal government and land designated by the board as experimental forest land, which is available for, and capable of, growing a crop of trees of a commercial species used to produce lumber and other forest products, including Christmas trees. Government Code section 51104(g) defines timberland zoned Timberland Production as land that has been zoned, devoted to, and used for growing and harvesting timber, or for growing and harvesting timber and compatible uses. The County does not contain land that has been specifically designated for forestland, timberland, or timberland production; however, the site may contain vegetation communities that can support a native tree cover (any species) under natural conditions.

The U.S. Forest Service defines a forested area as “forestland” if it is at least one 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. Forestland includes transition zones, which are those areas between heavily forested and nonforested lands that are at least 10 percent stocked with forest trees as well as forest areas adjacent to urban and built-up lands (U.S. Department of Agriculture 2016).

Development on or near land that contains forestry resources could directly or indirectly result in the loss of forestland or the conversion of forestland to non-forest use. The County does not contain any zoning classifications for forestland, timberland or timberland production zones. However, implementation of the CPU could result in the conversion of land that qualifies as forestland as defined in Public Resources Code Section 12220(g) to other uses. Therefore, the proposed project could result in a potentially significant impact, and further discussion in the SEIR is warranted.

d) Result in the loss of forest land or conversion of forest land to non-forest use, or involve other changes in the existing environment, which, due to their location or nature, could result in conversion of forest land to non-forest use?

- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Potentially Significant Impact: Please see the response to II(c) above. Implementation of the CPU could result in the conversion of land that qualifies as forestland per the Public Resources Code Section 12220(g) definition above. Therefore, the proposed project could result in a potentially significant impact, and further discussion in the SEIR is warranted.

e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Important Farmland or other agricultural resources, to non-agricultural use or conversion of forest land to non-forest use?

- | | | | |
|-------------------------------------|--|--------------------------|------------------------------|
| <input checked="" type="checkbox"/> | Potentially Significant Impact | <input type="checkbox"/> | Less than Significant Impact |
| <input type="checkbox"/> | Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> | No Impact |

Discussion/Explanation:

Potentially Significant Impact: Please see responses II(a) through II(d) above. Implementation of the CPU could increase density beyond that identified in the GPU PEIR, which could result in the conversion of Important Farmland or other agricultural resources to non-agricultural use, or conversion of forest land to non-forest use. Therefore, the proposed project could result in a potentially significant impact, and further discussion in the SEIR is warranted.

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?

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

Would the project:

a) Conflict with or obstruct implementation of the San Diego Regional Air Quality Strategy (RAQS) or applicable portions of the State Implementation Plan (SIP)?

- | | | | |
|-------------------------------------|--|--------------------------|------------------------------|
| <input checked="" type="checkbox"/> | Potentially Significant Impact | <input type="checkbox"/> | Less than Significant Impact |
| <input type="checkbox"/> | Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> | No Impact |

Discussion/Explanation:

Potentially Significant Impact: The GPU PEIR determined that direct and cumulative impacts associated with implementation of the San Diego Regional Air Quality Strategy (RAQS) or applicable portions of the State Implementation Plan (SIP) would be less than significant.

The San Diego Air Pollution Control District (SDAPCD) is required, pursuant to the federal and state Clean Air acts, to reduce emissions of criteria pollutants for which the County is in nonattainment 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 2016 RAQS (SDAPCD 2016a) as well as the 2012 ozone maintenance and 2016 attainment plans (SDAPCD 2012, 2016b). The RAQS outlines SDAPCD's plans and control measures to attain the state air quality standards for ozone, while the relevant SIP documents, the 2012 maintenance plan and 2016 attainment plan, outline 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 within the county, including, but not limited to, stationary sources and mobile sources.

Implementation of the CPU could increase residential density and/or commercial/industrial intensity beyond that identified in the GPU PEIR (i.e., the level currently anticipated by the California Air Resources Board (CARB) and San Diego Association of Governments (SANDAG), which could generate air quality emissions that were not accounted for in the applicable air quality plans. Therefore, future development associated with the CPU will be evaluated for consistency with the RAQS and SIP. The proposed project could result in a potentially significant impact, and further discussion in the SEIR is warranted.

b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?

- | | | | |
|-------------------------------------|--|--------------------------|------------------------------|
| <input checked="" type="checkbox"/> | Potentially Significant Impact | <input type="checkbox"/> | Less than Significant Impact |
| <input type="checkbox"/> | Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> | No Impact |

Discussion/Explanation:

San Diego County is presently in non-attainment for the 1-hour concentrations under the California Ambient Air Quality Standard (CAAQS) for O₃. San Diego County is also presently in non-attainment for the annual geometric mean and for the 24-hour concentrations of PM₁₀ under the CAAQS. O₃ is formed when volatile organic compounds (VOCs) and nitrogen oxides (NO_x) react in the presence of sunlight. VOC sources include any source that burns fuels (e.g., gasoline, natural gas, wood, oil); solvents; petroleum processing and storage; and pesticides. Sources of PM₁₀ in both urban and rural areas include: motor vehicles, wood burning stoves and fireplaces, dust from construction, landfills, agriculture, wildfires, brush/waste burning, and industrial sources of windblown dust from open lands.

Potentially Significant Impact: The GPU PEIR determined that future development would result in potentially significant direct and cumulative impacts associated with a cumulatively considerable net increase in criteria pollutants for which the SDAB is listed as non-attainment. While implementation of General Plan policies and mitigation measures would reduce direct

and cumulative impacts related to a cumulatively considerable net increase in criteria pollutants, impacts would not be fully mitigated and would remain significant and unavoidable.

Implementation of the CPU could increase residential density and/or commercial/industrial intensity beyond that identified in the GPU PEIR, which could result in considerable net increases in criteria pollutants for which the project region is non-attainment. The CPU would not directly result in construction or operational emissions. However, future projects implemented subsequent to adoption of the CPU could generate construction or operational emissions that could result in a cumulatively considerable net increase in criteria pollutants for which the SDAB is listed as non-attainment. Therefore, the proposed project could result in a potentially significant impact, and further discussion in the SEIR is warranted.

c) Expose sensitive receptors to substantial pollutant concentrations?

- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Air quality regulators typically define sensitive receptors as schools (Preschool-12th Grade), hospitals, resident care facilities, or day-care centers, or other facilities that may house individuals with health conditions that would be adversely impacted by changes in air quality. The County of San Diego also considers residences as sensitive receptors since they house children and the elderly.

Potentially Significant Impact: The GPU PEIR determined that future development would result in potentially significant direct and cumulative impacts associated with exposure of sensitive receptors to substantial pollutant concentrations. While implementation of General Plan policies and mitigation measures would reduce direct and cumulative impacts related to substantial pollutant concentrations, impacts would not be fully mitigated and would remain significant and unavoidable.

Implementation of the CPU could increase residential density and/or commercial/industrial intensity beyond that identified in the GPU PEIR, which could result in exposing sensitive receptors to substantial pollutant concentrations. The CPU would not directly result in construction or operational emissions. However, future projects implemented subsequent to adoption of the CPU could expose sensitive receptors to diesel particulate matter (DPM) during construction activities and could expose sensitive receptors to DPM generated by freeways and heavily traveled roadways. Additionally, future traffic generated by implementation of the CPU could result in carbon monoxide hot spots and heavily congested intersections. Therefore, the proposed project could result in a potentially significant impact, and further discussion in the SEIR is warranted.

d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Potentially Significant Impact: The GPU PEIR determined that future development would comply with SDAPCD regulations that require odor sources to reduce impacts on nearby receptors, and that impacts would be less than significant. Additionally, the GPU PEIR determined that cumulative impacts associated with odor would be less than significant.

According to CARB's *CEQA Air Quality and Land Use Handbook*, land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting facilities, refineries, landfills, dairies, and fiberglass molding facilities. Although it is not expected that proposed land use changes would increase the potential for these uses, the proposed CPU could result in land uses that generate odors, resulting in a potentially significant impact. Thus, further discussion in the SEIR is warranted.

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?

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

Would the project:

a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife, or CDFW, or U.S. Fish and Wildlife Service?

- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Potentially Significant Impact: The GPU PEIR determined that implementation of the GPU would result in potentially significant direct, indirect, and cumulative impacts on special status species. While implementation of General Plan policies and mitigation measures would reduce

impacts on special status species, impacts would not be fully mitigated and would remain significant and unavoidable.

The GPU PEIR determined that the Valley Center CPA contains coastal sage scrub, chaparral, grassland, and other woodland habitats that support sensitive or special-status species (see Figure 2.4-1 of the GPU PEIR). The GPU PEIR also estimated that buildout of the GPU would impact 14,259 acres of habitat within Valley Center (see Table 2.4-1 of the GPU PEIR). There are numerous federal, state and local regulations that protect sensitive natural communities identified in local or regional plans, policies, regulations, or by California Department of Fish and Wildlife (CDFW) or the U.S. Fish and Wildlife Service (USFWS).

Implementation of the CPU may result in development of additional land that was not considered in the GPU PEIR, which may in turn impact a larger amount of habitat that supports sensitive species. Therefore, the proposed project could result in a potentially significant impact, and further discussion in the SEIR is warranted.

b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?

- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Potentially Significant Impact: The GPU PEIR determined that implementation of the GPU would result in potentially significant direct, indirect, and cumulative impacts on riparian habitats and other sensitive natural communities. While implementation of General Plan policies and mitigation measures would reduce impacts on riparian habitats and other sensitive natural communities, impacts would not be fully mitigated and would remain significant and unavoidable.

The GPU PEIR estimated that buildout of the GPU would impact 502 acres of riparian habitat within Valley Center (see Table 2.4-3 of the GPU PEIR). 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 as well as non-wetland waters of the U.S. The California Lake and Streambed Alteration Program (Section 1602 of the CDFG Code) requires written notification to CDFW prior to altering a riparian area supported by a lake, river, or stream. On the local level, the County's RPO restricts certain impacts to wetlands, wetland buffers, floodways, and floodplain fringe areas.

Implementation of the CPU may result in development in areas not anticipated for development in the GPU PEIR, which may in turn impact a larger amount of riparian habitats and other sensitive natural communities. Therefore, the proposed project could result in a potentially significant impact, and further discussion in the SEIR is warranted.

c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Potentially Significant Impact: The GPU PEIR determined that implementation of the GPU would result in potentially significant direct impacts on federally protected wetlands. However, the GPU PEIR determined that implementation of proposed GPU policies and mitigation measures would mitigate direct impacts on federally protected wetlands to a level less than significant.

Valley Center contains wetlands as defined by Section 404 of the CWA, which regulates certain impacts to federally protected wetlands as well as non-wetland waters of the U.S. The GPU PEIR estimated that buildout of the GPU would impact 133 acres of federally protected wetlands within Valley Center (see Table 2.4-6 of the GPU PEIR).

Implementation of the CPU may result in development of additional land that was not considered in the GPU PEIR, which may in turn impact a larger amount of federally protected wetlands. Since certification of the GPU PEIR, the CEQA Guidelines Appendix G Environmental Checklist Form was revised to include state protected wetlands under this threshold. Therefore, the proposed project could result in a potentially significant impact, and further discussion in the SEIR is warranted.

d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Potentially Significant Impact: The GPU PEIR determined that implementation of the GPU would result in potentially significant direct and cumulative impacts on wildlife corridors. While implementation of General Plan policies and mitigation measures would reduce impacts on wildlife corridors, impacts would not be fully mitigated and would remain significant and unavoidable.

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. The GPU PEIR identified two Draft Multiple Species Conservation Plan (MSCP) Habitat Linkages within the Valley Center CPA (see Figure 2.4-2 of the GPU PEIR). Implementation of the CPU may result in development of additional land that was not considered in the GPU PEIR, which may in turn impact Draft MSCP Habitat Linkages. Therefore, the proposed project could result in a potentially significant impact, and further discussion in the SEIR is warranted.

e) Conflict with the provisions of any adopted Habitat Conservation Plan, Natural Communities Conservation Plan, other approved local, regional or state habitat conservation plan or any other local policies or ordinances that protect biological resources?

- | | | | |
|-------------------------------------|--|--------------------------|------------------------------|
| <input checked="" type="checkbox"/> | Potentially Significant Impact | <input type="checkbox"/> | Less than Significant Impact |
| <input type="checkbox"/> | Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> | No Impact |

Discussion/Explanation:

Potentially Significant Impact: The GPU PEIR determined that implementation of the GPU would not result in conflicts with any habitat conservation plan or natural community conservation plan and impacts would be less than significant.

There is no currently adopted habitat conservation plan or natural community conservation plan within the Valley Center CPA. The CPU would be evaluated for consistency with the County RPO. Additionally, the consistency with the Draft North County MSCP plan would be evaluated. As the proposed CPU land uses have not been determined at this time, proposed land use changes could allow development in areas that were not considered in the GPU PEIR, which may in turn result in conflicts with these ordinances and the Draft North County MSCP. Therefore, the proposed project could result in a potentially significant impact, and further discussion in the SEIR is warranted.

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 tribal cultural resources?

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

Would the project:

a) Cause a substantial adverse change in the significance of a historical resource pursuant to 15064.5?

- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Potentially Significant Impact: The GPU PEIR determined that implementation of the GPU would result in potentially significant direct and cumulative impacts associated with historical resources. However, the GPU PEIR determined that implementation of proposed GPU policies and mitigation measures would mitigate direct impacts associated with historical resources to a level less than significant.

The GPU PEIR identified three or more historical resources within the Valley Center CPA (see Figure 2.5-2 of the GPU PEIR). Furthermore, additional historical resources may have been identified with the Valley Center CPA subsequent to certification of the GPU PEIR. Implementation of the CPU may result in increased density that was not considered in the GPU PEIR, which may in turn result in future development that could cause a substantial change in the significance of a historical resource, per State CEQA Guidelines Section 15064.5. Therefore, the proposed project could result in a potentially significant impact, and further discussion in the SEIR is warranted.

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to 15064.5?

- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Potentially Significant Impact: The GPU PEIR determined that implementation of the GPU would result in potentially significant direct and cumulative impacts associated with archaeological resources. However, the GPU PEIR determined that implementation of proposed GPU policies and mitigation measures would mitigate direct impacts associated with archaeological resources to a level less than significant.

Implementation of the CPU may result in increased residential density and/or commercial/industrial intensity that was not considered in the GPU PEIR, which may in turn result in future development that could cause a substantial change in the significance of an archaeological resource, per State CEQA Guidelines Section 15064.5. This would include potential impacts to archaeological resources that have been identified in previous record searches and field surveys, as well as unknown resources that may be unearthed during

construction of subsequent future projects. Therefore, the proposed project could result in a potentially significant impact, and further discussion in the SEIR is warranted.

c) Disturb any human remains, including those interred outside of *dedicated* cemeteries?

- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Potentially Significant Impact: The GPU PEIR determined that implementation of the GPU would result in potentially significant direct and cumulative impacts associated with human remains. However, the GPU PEIR determined that implementation of proposed GPU policies and mitigation measures would mitigate direct impacts associated with human remains to a level less than significant.

Archaeological materials, including human burials, have been found throughout unincorporated San Diego County. Human burials have occurred outside of 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. Resources throughout the County include remains left by local Native Americans and other early inhabitants. Due to the size of the study area, human remains and/or burials could be present in the CPA.

Implementation of the CPU may result in increased residential density and/or commercial/industrial intensity that was not considered in the GPU PEIR, which may in turn increase the potential to unearth unknown human remains during construction of subsequent future projects. Therefore, the proposed project could result in a potentially significant impact, and further discussion in the SEIR is warranted.

VI. ENERGY

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 related to energy?

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

Would the project:

- a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Potentially Significant Impact: Since certification of the GPU PEIR, the CEQA Guidelines Appendix G Environmental Checklist Form was expanded to include an evaluation of impacts on energy. Because the component was added to CEQA Appendix G after adoption of the 2011 GPU PEIR, potential impacts related to wasteful, inefficient, or unnecessary consumption of energy resources was not analyzed.

Subsequent projects that may result from implementation of the CPU may result in significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation. Therefore, the proposed project could result in a potentially significant impact, and further discussion in the SEIR is warranted.

- b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Potentially Significant Impact: Since certification of the GPU PEIR, the CEQA Guidelines Appendix G Environmental Checklist Form was expanded to include an evaluation of impacts on energy. Because the component was added to CEQA Appendix G after adoption of the 2011 GPU PEIR, potential impacts related to conflicts with or obstructions of a state or local plan for renewable energy or energy efficiency was not analyzed.

Subsequent projects that may result from implementation of the CPU may conflict with or obstruct a state or local plan for renewable energy or energy efficiency. Therefore, the proposed project could result in a potentially significant impact, and further discussion in the SEIR is warranted.

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?

YES NO

Would the project:

- 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.

Potentially Significant Impact Less than Significant Impact
 Less Than Significant With Mitigation Incorporated No Impact

Discussion/Explanation:

Less than Significant Impact: The GPU PEIR determined that compliance with all applicable federal, state, and local regulations and building standards related to geologic risks, including the California Building Code (CBC) and County-required geotechnical reconnaissance reports and investigations, would reduce impacts associated with fault rupture to a level less than significant.

The Valley Center CPA is located within the seismically active southern California region. Review of the GPU PEIR determined that there is one inactive fault (Pre-Quaternary) located in the southeast segment of the Valley Center CPA (see Figure 2.6-1 of the GPU PEIR), and that there are no Alquist-Priolo or County Special Study fault zones within the Valley Center CPA, or within 50 feet of the CPA boundary (see Figure 2.6-2 of the GPU PEIR). Future land uses associated with the proposed CPU would be required to comply with all applicable federal, state and local regulations and building standards related to seismic safety, including the CBC and County required geotechnical reconnaissance reports and investigations. Therefore, impacts associated with fault rupture would be less than significant.

- ii. Strong seismic ground shaking?

Potentially Significant Impact Less than Significant Impact
 Less Than Significant With Mitigation Incorporated No Impact

Discussion/Explanation:

Less than Significant Impact: The GPU PEIR determined that compliance with all applicable federal, state, and local regulations and building standards related to geologic risks, including the CBC and County required geotechnical reconnaissance reports and investigations, would reduce impacts associated with fault rupture to a level less than significant.

The Valley Center CPA is located within the seismically active southern California region, and all of San Diego County is located with areas designated as CBC Seismic Design Categories E and F, which have the potential to be subjected to the highest levels of ground shaking. Therefore, future development associated with the proposed project could expose people or structures to strong seismic ground shaking. However, the CBC includes specific Seismic Hazards Standards for construction within areas of high seismic activity, and all future above-ground structures are required to comply with the structural parameters set forth within the most current edition of the CBC in order to anticipate and avoid potential impacts associated with seismic ground shaking. Future development associated with the CPU would be required to comply with the structural design requirements for CBC Seismic Design Categories E and F, and compliance with these structural design requirements would be ensured through the County building permit process. Therefore, impacts associated with strong seismic ground shaking would be less than significant.

iii. Seismic-related ground failure, including liquefaction?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less than Significant Impact: The GPU PEIR determined that compliance with all applicable federal, state, and local regulations and building standards related to geologic risks, including the CBC and County-required geotechnical reconnaissance reports and investigations, would reduce impacts associated with seismic-related ground failure, including liquefaction, to a level less than significant.

Review of the GPU PEIR determined that there are approximately 15,181 acres of land within the Valley Center CPA are identified as potential liquefaction hazard areas (see Table 2.6-12 of the GPU PEIR). Therefore, future development associated with the proposed project could expose people or structures to adverse effects associated with seismic-related ground failure, including liquefaction. However, the County requires that projects located within a potential liquefaction area prepare a geotechnical study prior to issuance of building permits. These geotechnical studies must demonstrate that the potential for liquefaction is a sufficiently low hazard that would be within the defined acceptable level or risk criteria or would propose mitigation suitable to effectively reduce the hazards to acceptable levels. Therefore, compliance with construction recommendations and/or the requirements of the geotechnical investigations prepared for future development projects, as well as compliance with applicable

building code requirements, would reduce impacts associated with seismic-related ground failure, including liquefaction, to a level less than significant.

iv. Landslides?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less than Significant Impact: The GPU PEIR determined that compliance with all applicable federal, state, and local regulations and building standards related to geologic risks, including the CBC and County-required geotechnical reconnaissance reports and investigations, would reduce impacts associated with landslides to a level less than significant.

The GPU PEIR identified landslide risk areas based on data including steep slopes (greater than 25 percent); soil series data; soil-slip susceptibility from USGS; Landslide Hazard Zone Maps developed by the California Department of Conservation, Division of Mines and Geology (DMG); and gabbroic soils on slopes steeper than 15 percent in grade (County of San Diego 2011b).

Review of the GPU PEIR determined that there are no locations within the Valley Center CPA that have been identified as having high or moderate soil slip susceptibility, but that there are some locations that have been identified as consisting of steep slopes or gabbroic soils on slopes steeper than 15 percent (see Figure 2.6-4 of the GPU PEIR). However, the County requires projects located on or within 500 feet of a landslide susceptibility area to prepare a geologic evaluation to determine whether there are risks to people or property from landslides. The geologic evaluation is required to conform to the California Board of Geologists and Geophysicists Guidelines for Engineering Geologic Reports and be completed by a Certified Engineering Geologist. Therefore, compliance with construction recommendations and/or the requirements of the geotechnical evaluations prepared for future development projects, as well as compliance with building code requirements, would reduce impacts associated with landslides to a level less than significant.

b) Result in substantial soil erosion or the loss of topsoil?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less than Significant Impact: The GPU PEIR determined that compliance with existing applicable regulations including the National Pollution Discharge Elimination System (NPDES) permit program, CBC, and County Grading Ordinance, would reduce impacts associated with substantial soil erosion or the loss of topsoil to a level less than significant.

Implementation of the CPU may result in development of additional land that was not considered in the GPU PEIR, which may result in substantial soil erosion if future projects do not adequately implement appropriate best management practices (BMPs) during construction. However, future projects implemented under the CPU would be required to comply with the CBC and the County Grading Ordinance, both of which would ensure implementation of appropriate BMPs during grading and construction activities to reduce soil erosion. The County Grading Ordinance requires all clearing and grading activities to be carried out with dust control measures, such as watering, an application of surfactants, shrouding, control of vehicle speeds, paving in access areas, or other measures to reduce erosion from wind. Future projects implemented under the CPU would also be required to comply with the NPDES permit program, which requires stormwater pollution prevention plans (SWPPPs) to be prepared and BMPs to be identified for construction sites greater than one acre. Implementation of appropriate BMPs would protect water quality by controlling stormwater runoff and ensuring that the quality of stormwater flows meets the applicable requirements of the Regional Water Quality Control Board (RWQCB). Therefore, compliance with all applicable regulations, including the CBC, NPDES, and County Grading Ordinance, would reduce impacts related to substantial soil erosion or the loss of topsoil to a level less than significant.

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?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less than Significant Impact: The GPU PEIR determined that compliance with all applicable federal, state, and local regulations and building standards would reduce impacts associated with on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse to a level less than significant.

Implementation of the CPU may result in development of additional land that was not considered in the GPU PEIR that are underlain by soils that are unstable, or could become unstable, leading to lateral spreading, subsidence, or collapse. Similarly, future projects implemented under the CPU could exacerbate existing conditions, causing soils to become unstable and result in an on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse.

The Multi-Jurisdictional Hazard Mitigation Plan determined that underlying geologic formations in the County are mostly granitic which have a very low potential of subsidence. No occurrences of subsidence have been identified in Valley Center, and therefore, future development implemented under the CPU is not anticipated to result in potentially significant impacts associated with subsidence risks. The County requires development projects located in areas that could be susceptible to lateral spreading, landslides, or liquefaction to prepare a

geotechnical study and/or investigation. Compliance with geotechnical study recommendations would minimize hazards associated with lateral spreading, landslides, or liquefaction. The County's Grading Ordinance also includes requirements to ensure soil stability during grading and construction as well as requirements for any steepening of slopes. Compliance with geotechnical study recommendations, as well as compliance with building code requirements, would reduce impacts associated with landslides, lateral spreading, subsidence, liquefaction, or collapse to a level less than significant.

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?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less than Significant Impact: The GPU PEIR determined that compliance with all applicable federal, state, and local regulations, including the CBC, would reduce impacts associated with expansive soils to a level less than significant.

Review of the GPU PEIR determined that expansive soils are located within the Valley Center CPA (see Figure 2.6-5 of the GPU PEIR). Implementation of the CPU may result in development of additional land that was not considered in the GPU PEIR within areas that are underlain by expansive soils. However, future projects implemented under the CPU would be required to comply with all applicable federal, state, and local regulations, including the International Building Code and CBC with respect to expansive soils. Therefore, compliance with all applicable regulations would reduce impacts associated with expansive soils to a level less than significant.

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

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less than Significant Impact: The GPU PEIR determined that implementation of the GPU would result in development in areas where soils are incapable of adequately supporting the use of septic tanks or other on-site wastewater treatment systems. However, GPU PEIR determined that compliance with all applicable federal, state, and local regulations, including County Department of Environmental Health standards would reduce impacts associated with soils incapable of adequately supporting the use of the use of septic tanks or alternative wastewater disposal systems to a level less than significant.

The GPU PEIR determined that there are areas within Valley Center that utilize on-site wastewater disposal treatment systems, including individual septic systems to meet wastewater demands. Implementation of the CPU could result in development of new projects in locations that would also need to utilize on-site wastewater disposal treatment systems. However, proponents of such projects would be required to comply with RWQCB siting standards and conduct site specific evaluations prior to siting an on-site wastewater treatment system. The County Department of Environmental Health has several policies in place for permitting septic systems. The County's Design Manual for On-site Wastewater Treatment Systems provides design criteria and guidance for the review and permitting of on-site wastewater treatment systems. Future development requiring on-site wastewater treatment systems would also be required to comply with the County's On-site Wastewater Treatment System Groundwater Separation Policy as well as County Code Section 68.601. All future development projects would be required to comply with all applicable federal, state, and local regulations related to septic tanks and wastewater disposal. Compliance with the regulations and guidance described above would reduce the potential for septic systems to be located in soils that would be incapable of supporting such systems and reduce impacts to a level less than significant.

f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less than Significant Impact: The GPU PEIR determined that implementation of the GPU would result in potentially significant direct and cumulative impacts on paleontological resources. However, the GPU PEIR determined that implementation of proposed GPU policies and mitigation measures would mitigate direct and cumulative impacts on paleontological resources to a level less than significant.

Review of the GPU PEIR determined that a limited amount of land within the Valley Center CPA is classified as having a low or marginal paleontological sensitivity rating, while the majority of land within the Valley Center CPA is classified as having zero potential to possess paleontological resources (see Figure 2.5-3 of the GPU PEIR). Therefore, it is not anticipated that the proposed project would directly or indirectly destroy unique paleontological resources, and impacts would be less than significant.

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 cause one or more effects to greenhouse gas emission?

YES NO

Would the project:

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

- | | | | |
|-------------------------------------|--|--------------------------|------------------------------|
| <input checked="" type="checkbox"/> | Potentially Significant Impact | <input type="checkbox"/> | Less than Significant Impact |
| <input type="checkbox"/> | Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> | No Impact |

Discussion/Explanation:

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

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

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

As the County has adopted a Climate Action Plan (CAP), the SEIR will include analysis based on criteria number 3 above to evaluate the significance of GHG emissions. However, considering the ongoing CAP litigation discussed below, the analysis will conservatively provide additional analysis beyond CAP consistency, based on criteria 1 and 2.

Potentially Significant Impact: The GPU PEIR determined that future development could result in potentially significant direct and cumulative impacts related to compliance with

Assembly Bill 32. However, the GPU PEIR determined that implementation of proposed GPU policies and mitigation measures would mitigate direct and cumulative impacts related to compliance with Assembly Bill 32 to a level less than significant. One of the mitigation measures identified in the GPU PEIR called for the preparation of a Climate Change Action Plan designed to reach specified GHG reduction targets from community and local government operations, modifications to the Guidelines to provide guidance on the evaluation of GHG impacts and determine a project's consistency with the CAP, and adoption of a GHG Threshold to reduce GHG emissions. In June 2012, the County adopted the 2012 CAP and an Addendum to the 2011 GPU PEIR. In a ruling issued on October 29, 2014 (*Sierra Club v. County of San Diego*, 231 Cal. App. 4th 1152 [2014]), the Fourth District Court of Appeal held that the 2012 CAP did not meet the description set forth in the adopted mitigation measure (2011 GPU PEIR Mitigation Measure [MM] CC-1.2) and that a supplemental EIR was needed for the plan. On February 14, 2018, the Board of Supervisors adopted a new CAP and Draft SEIR. The targets and strategies identified within the CAP were based upon updated statewide GHG reduction targets, and as such necessitate changes to Goal COS-20 and Policy COS-20.1 of the 2011 GPU and mitigation adopted in the 2011 GPU PEIR, MM CC-1.2, CC-1.7, and CC-1.8. The changes to the goal and policy required a GPA to the 2011 GPU, which was adopted as part of the CAP project. The new CAP is currently under legal review.

Implementation of the CPU may result in increased residential density and/or commercial/industrial intensity that was not considered in the GPU PEIR, which may in turn generate GHG emissions that may have a significant impact on the environment. The CPU would not directly result in construction or operational activities that would generate GHG emissions. However, the CPU could increase land use density that exceeds what was assumed in the CAP. Therefore, the proposed project could result in a potentially significant impact, and further discussion in the SEIR is warranted.

b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Potentially Significant Impact: Please see the response to VII(a) above. The CPU could increase residential density and/or commercial/industrial intensity that may generate GHG emissions in the County and within Valley Center above emissions levels projected in the CAP. This potential increase in emissions could conflict with applicable plans, policies, or regulations adopted for reducing GHG emissions. Therefore, the proposed project could result in a potentially significant impact, and further discussion in the SEIR is warranted.

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 cause one or more effects related to hazards and hazardous materials?

YES NO

Would the project:

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

- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Potentially Significant Impact: The GPU PEIR determined that future development would increase the transport, use, and disposal of hazardous materials. However, compliance with applicable federal, state, and local regulations related to the transport, use, storage, and disposal of hazardous materials would minimize the potential for a release to occur and provide planning mechanisms for prompt and effective cleanup if an accidental release should occur. The GPU PEIR determined that compliance with existing regulations and implementation of General Plan policies would reduce impacts related to an accidental hazardous materials release to a level less than significant.

The GPU PEIR identified five registered "active" hazardous waste transporters in the unincorporated County, none of which are located within Valley Center. Although hazardous materials can be found in all land use designations, those that are more likely to regularly use hazardous materials include limited impact industrial, medium impact industrial, high impact industrial, general commercial and rural commercial.

As the update to the Community Plan is anticipated to include changes to General Plan land use designations and zoning that could result in increased commercial/industrial intensity, there is the potential that an increase in intensity of these land uses could result in a significant hazard to the public or the environment through the routine transport, storage, use, or disposal of hazardous materials or wastes or through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. Therefore, the proposed project could result in a potentially significant impact, and further discussion in the SEIR is warranted.

b) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Potentially Significant Impact: The GPU PEIR determined that implementation of the GPU would include land uses with high potential for hazardous materials could be located within 0.25 mile of an existing or proposed school. However, the GPU PEIR determined that compliance with federal and state regulations pertaining to hazardous wastes would reduce direct and cumulative risks associated with schools to a level less than significant.

Review of the GPU PEIR determined that there are no schools within Valley Center located within 0.25 mile of hazardous material site listed under Government Code 65962.5 (see Table 2.7-10 of the GPU PEIR). Almost all land uses have the potential to use, store, transport and dispose of hazardous materials, including schools and day care operations, which may use and dispose of hazardous materials, such as cleaning products or chemicals, that potentially pose a risk to the public. Future projects implemented subsequent to adoption of the CPU could involve handling acutely hazardous materials or emit hazardous emissions within 0.25 mile of a school. Therefore, the proposed project could result in a potentially significant impact, and further discussion in the SEIR is warranted.

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

- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Potentially Significant Impact: The GPU PEIR determined that future development had the potential to be located on sites such as burn dumps; active, abandoned, or closed landfills; areas with historic or current agriculture; or areas with petroleum contamination. However, the GPU PEIR determined that implementation of proposed GPU policies and compliance with existing federal, state, and local regulations related to existing on-site hazardous materials contamination would reduce potential impacts to a level less than significant.

Review of the GPU PEIR determined that there are no burnsites within the Valley Center CPA (see Figure 2.7-2 of the GPU PEIR). Review of the California Department of Toxic Substances Control (DTSC) Envirostor Database (DTSC 2020) did not identify any active hazardous material sites within the Valley Center CPA. Review of the State Water Resources Control

Board (SWRCB) Geotracker Database (SWRCB 2020) determined that there are four active hazardous material sites within the Valley Center CPA. Implementation of the CPU may result in development of additional land within or near these known hazardous materials sites that was not considered in the GPU PEIR. Therefore, the proposed project could result in a potentially significant impact, and further discussion in the SEIR is warranted.

d) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?

- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Potentially Significant Impact: The GPU PEIR determined that future development had the potential to be 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. However, the GPU PEIR determined that implementation of proposed GPU policies and mitigation measures, in addition to compliance with applicable regulations such as Airport Land Use Compatibility Plans, the Federal Aviation Administration regulations and the State Aeronautics Act, would reduce potential impacts to a level less than significant. It should be noted that the GPU PEIR determined that the Valley Center is not within an airport land use plan or within two miles of a public airport or public use airport.

Review of the GPU PEIR determined that there are no public use airports located within Valley Center (see Table 2.7-4 of the GPU PEIR). However, two private airports operate within Valley Center including the Blackington Airpark and an airstrip at the Lake Wohlford Resort. Additionally, the Hoag Heliport is a private heliport operating within Valley Center. While, the CPU planning area is not within two miles of a public airport or public use airport or in the vicinity of an Airport Land Use Compatibility Plan, an Airport Influence Area, or a Federal Aviation Administration Height Notification Surface, proposed land uses could conflict with private airstrips and heliports within the community. Therefore, the project could generate a safety hazard or excessive noise for people residing or working in the project area. A potentially significant impact could occur.

e) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Potentially Significant Impact: The GPU PEIR determined that future development had the potential to be located in areas that result in potentially significant impacts related to emergency response and evacuation plans. However, the GPU PEIR determined that implementation of GPU policies and mitigation measures, as well as compliance with applicable regulations, such as the Multi-Jurisdictional Hazard Mitigation Plan and the Dam Evacuation Plan, would reduce impacts to a level less than significant.

Applicable emergency response plan requirements are set forth by the County of San Diego Office of Emergency Services and other local police and fire departments within or adjacent to the Valley Center CPA through the Operational Area Emergency Plan, a comprehensive emergency plan that defines responsibilities, establishes an emergency organization, defines lines of communications, and integrates with the statewide Standardized Emergency Management System. The Operational Area Emergency Plan provides guidance for emergency planning and requires subsequent plans to be established by each jurisdiction that has responsibilities in a disaster situation. The Office of Emergency Services coordinates emergency response at the local level in the event of a disaster, including fires. Emergency response coordination is generally facilitated by the Operational Area Emergency Operations Center as well as local responding agencies. The County of San Diego has several emergency response or emergency evacuation plans, which are applicable to the Valley Center CPA. One of these is the Multi-Jurisdictional Hazard Mitigation Plan that includes an overview of the risk assessment process and the hazards present in the jurisdiction, hazard profiles, and vulnerability assessments.

The proposed project would not interfere with the San Diego County Nuclear Power Station Emergency Response Plan because of the location of the project and the specific requirements of the plan. Similarly, the proposed project would not interfere with the Oil Spill Contingency Element because the planning area is not located along the Coastal Zone or a coastline. Additionally, the proposed project would not interfere with the Emergency Water Contingencies Annex and Energy Shortage Response Plan because the project would not alter major water or energy supply infrastructure, such as the California Aqueduct. However, the potential remains that future development could conflict with adopted emergency response or evacuation plans applicable to Valley Center. Therefore, the proposed project could result in a potentially significant impact, and further discussion in the SEIR is warranted.

- f) 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?

- | | | | |
|-------------------------------------|--|--------------------------|------------------------------|
| <input checked="" type="checkbox"/> | Potentially Significant Impact | <input type="checkbox"/> | Less than Significant Impact |
| <input type="checkbox"/> | Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> | No Impact |

Discussion/Explanation:

Potentially Significant Impact: The GPU PEIR determined that implementation of the GPU would result in potentially significant direct impacts associated with increasing human exposure to vectors. However, the GPU PEIR determined that compliance with existing regulations, policies, plans, and guidelines associated with vector control would reduce impacts to a level less than significant.

Typical adverse effects related to vectors are two-fold. First, vectors can cause potentially significant public health risks because of the transmission of diseases to human and animal populations. Second, vectors can create a nuisance for residents of the County. A project that proposes a source of vector breeding habitat could result in an unnecessary increase in vector populations. When the vector breeding source is located near a substantial human population, a potentially adverse environmental effect could occur.

Implementation of the CPU could result in land uses that allow for 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. While future development would be required to comply with existing regulations and processes associated with vector control, it is not known whether the proposed project could further support land uses that would create vector impacts. Therefore, implementation of the CPU could create a significant hazard to the public or the environment by supporting land uses that could substantially increase human exposure to vectors, and impacts would be potentially significant.

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?

YES NO

Would the project:

a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Potentially Significant Impact Less than Significant Impact
 Less Than Significant With Mitigation Incorporated No Impact

Discussion/Explanation:

Potentially Significant Impact: The GPU PEIR determined that future development would result in potentially significant direct and cumulative impacts related to wastewater discharge requirements. While implementation of General Plan policies and mitigation measures, as well

as compliance with existing County policies and regulations, would reduce impacts related to wastewater discharge requirements, impacts would not be fully mitigated and would remain significant and unavoidable.

Implementation of the CPU may result in increased residential density and/or commercial/industrial intensity that was not considered in the GPU PEIR, which may in turn result in degradation of surface or ground water quality. The CPU would not directly result in construction or operational activities that could violate water quality standards. However, future projects implemented subsequent to adoption of the CPU could result in construction or operational activities that could violate water quality standards or waste discharge requirements. Therefore, the proposed project could result in a potentially significant impact, and further discussion in the SEIR is warranted.

b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

- | | | | |
|-------------------------------------|--|--------------------------|------------------------------|
| <input checked="" type="checkbox"/> | Potentially Significant Impact | <input type="checkbox"/> | Less than Significant Impact |
| <input type="checkbox"/> | Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> | No Impact |

Discussion/Explanation:

Potentially Significant Impact: The GPU PEIR determined that future development would result in potentially significant direct and cumulative impacts related to groundwater supply and recharge. While implementation of General Plan policies and mitigation measures, as well as compliance with existing County policies and regulations, would reduce impacts related to groundwater supply and recharge, impacts would not be fully mitigated and would remain significant and unavoidable.

The proposed project entails an update to the existing Valley Center Community Plan, which would not directly 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. However, projects implemented subsequent to and consistent with the Valley Center CPU could deplete or interfere with groundwater recharge. This could be considered a potentially significant effect of the proposed project. Therefore, further discussion is warranted 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 surfaces, in a manner which would:

(i) result in substantial erosion or siltration on- or off-site;

- | | | | |
|-------------------------------------|--|--------------------------|------------------------------|
| <input checked="" type="checkbox"/> | Potentially Significant Impact | <input type="checkbox"/> | Less than Significant Impact |
| <input type="checkbox"/> | Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> | No Impact |

Discussion/Explanation:

Potentially Significant Impact: The GPU PEIR determined that future development would result in the alternation of drainage patterns, resulting in potentially significant direct and cumulative impacts related to erosion or siltation. However, the GPU PEIR determined that implementation of GPU policies and mitigation measures, as well as compliance with applicable regulations, would reduce impacts related to erosion or siltation to a level less than significant.

Implementation of the CPU could increase residential density and/or commercial/industrial intensity beyond that identified in the GPU PEIR, which could result in alterations to existing drainage patterns. The CPU would not directly result in construction or operational activities that could substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner that could result in substantial erosion or siltation on- or off-site. However, future projects implemented subsequent to adoption of the CPU could result in construction or operational activities that could alter existing drainage patterns, resulting in substantial erosion or siltation. Therefore, the proposed project could result in a potentially significant impact, and further discussion in the SEIR is warranted.

- (ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;

- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Potentially Significant Impact: The GPU PEIR determined that future development would convert permeable surfaces to impermeable surfaces and result in potentially significant direct and cumulative impacts related to flooding on- or off-site. However, the GPU PEIR determined that implementation of the GPU policies and mitigation measures, as well as compliance with applicable regulations, would reduce direct and cumulative impacts to a level less than significant.

The proposed project entails an update to the existing Community Plan, which would not directly result in construction or operational activities that could result in flooding on- or off-site. However, future projects implemented subsequent to adoption of the CPU could result in construction or operational activities that could result in flooding on- or off-site. Therefore, the proposed project could result in a potentially significant impact, and further discussion in the SEIR is warranted.

(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

- | | | | |
|-------------------------------------|--|--------------------------|------------------------------|
| <input checked="" type="checkbox"/> | Potentially Significant Impact | <input type="checkbox"/> | Less than Significant Impact |
| <input type="checkbox"/> | Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> | No Impact |

Potentially Significant Impact: The GPU PEIR determined that future development would exceed the capacity of existing stormwater drainage facilities, resulting in potentially significant impacts. However, the GPU PEIR determined that implementation of the GPU policies and mitigation measures, as well as compliance with applicable regulations, would reduce impacts to a level less than significant.

The proposed project entails an update to the Valley Center Community Plan, which would not directly result in construction or operational activities that could create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems. However, future projects implemented subsequent to adoption of the CPU could result in construction or operational activities that could create or contribute to runoff water. Therefore, the proposed project could result in a potentially significant impact, and further discussion in the SEIR is warranted.

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

- | | | | |
|-------------------------------------|--|--------------------------|------------------------------|
| <input checked="" type="checkbox"/> | Potentially Significant Impact | <input type="checkbox"/> | Less than Significant Impact |
| <input type="checkbox"/> | Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> | No Impact |

Potentially Significant Impact: The GPU PEIR determined that future development would result in potentially significant direct and cumulative impacts associated with land designated for residential use within a 100-year floodplain. However, the GPU PEIR determined that implementation of the GPU policies and mitigation measures, as well as compliance with applicable regulations, would reduce the direct and cumulative impacts to a level less than significant. The GPU PEIR determined that impacts associated with tsunamis and seiches would be less than significant.

Review of the GPU PEIR determined that there are 1,134 acres of land within Valley Center located within the 100-year floodplain (see Table 2.8-5 of the GPU PEIR). Some of this land located within the 100-year floodplain is developed with residential uses (see Table 2.8-5 of the GPU PEIR). The proposed project entails an update to the existing Community Plan, which would not directly result in construction of housing or other structures. However, future projects implemented subsequent to adoption of the CPU could place housing and other structures within a 100-year flood hazard area, as mapped on a federal Flood Hazard Boundary Map or Flood Insurance Rate Map, or within areas delineated on another flood hazard map, including County floodplain maps. Therefore, the proposed project could result in a potentially significant impact, and further discussion in the SEIR is warranted.

Due to its location inland from the Pacific Ocean, the proposed project would not result in any impacts related to tsunamis. Review of the GPU PEIR determined that there are no lakes or reservoirs within Valley Center that could result in significant impacts related to seiche (see Figure 2.8-4 of the GPU PEIR).

e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

- | | | | |
|-------------------------------------|--|--------------------------|------------------------------|
| <input checked="" type="checkbox"/> | Potentially Significant Impact | <input type="checkbox"/> | Less than Significant Impact |
| <input type="checkbox"/> | Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> | No Impact |

Potentially Significant Impact: Since certification of the GPU PEIR, the CEQA Guidelines Appendix G Environmental Checklist Form was expanded to include an evaluation of whether a project would conflict or obstruct implementation of a water quality control plan or sustainable groundwater management plan. Because the component was added to CEQA Appendix G after adoption of the 2011 GPU PEIR, potential impacts related to conflict or obstruct implementation of a water quality control plan or sustainable groundwater management plan was not analyzed. Since adoption of the General Plan, the Sustainable Groundwater Management Act (SGMA) was signed into law and the County has designated four of the County's groundwater basins as being subject to the SGMA. None of the designated basins are located within Valley Center; therefore, the CPU would not conflict with a sustainable groundwater management plan.

However, the CPU could result in a significant environmental impact related to conflicts with a water quality control plan. The GPU PEIR determined that future development would contribute additional point- and non-point-source pollutants within watershed management areas (WMAs) that are in violation of water quality requirements, resulting in potentially significant direct and cumulative impacts on already-impaired water bodies. While implementation of General Plan policies and mitigation measures, as well as compliance with existing applicable regulations, related to water body impairment, impacts would not be fully mitigated and would remain significant and unavoidable.

Review of the GPU PEIR determined that Valley Center lies primarily within the San Luis Rey WMA, while the southernmost portion of the CPA lies within the Carlsbad WMA (see Figure 2.8-5 of the GPU PEIR). The Clean Water Act Section 303(d) list has documented that these watersheds are impaired by a variety of pollutants (see Table 2.8-1 of the GPU PEIR). The CPU would not directly result in construction or operational activities that could contribute to the impairment of these watersheds. However, future projects implemented subsequent to adoption of the CPU could result in construction or operational activities that could contribute to the impairment of these watersheds. Therefore, the proposed project could result in a potentially significant impact, and further discussion in the SEIR is warranted.

The GPU PEIR also determined that future development would result in potentially significant direct, indirect, and cumulative impacts related to surface and groundwater quality standards

and requirements. While implementation of General Plan policies and mitigation measures, as well as compliance with existing County policies and regulations, would reduce impacts related to surface or groundwater quality standards and requirements, impacts would not be fully mitigated and would remain significant and unavoidable.

Review of the GPU PEIR determined that Valley Center lies primarily within the San Luis Rey WMA, while the southernmost portion of the CPA lies within the Carlsbad WMA (see Figure 2.8-5 of the GPU PEIR). The CPU would not directly result in construction or operational activities that could contribute to an exceedance of applicable surface or groundwater receiving water quality objectives or degradation of beneficial uses. However, future projects implemented subsequent to adoption of the CPU could result in construction or operational activities that could contribute to an exceedance of applicable surface or groundwater receiving water quality objectives or degradation of beneficial uses. Therefore, the proposed project could result in a potentially significant impact, and further discussion in the SEIR is warranted.

XI. 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?

YES NO

Would the project:

a) Physically divide an established community?

Potentially Significant Impact Less than Significant Impact
 Less Than Significant With Mitigation Incorporated No Impact

Discussion/Explanation:

Potentially Significant Impact: The GPU PEIR determined that implementation of the GPU would result in potentially significant direct and cumulative impacts associated with physically dividing an established community. However, the GPU PEIR determined that implementation of proposed GPU policies and mitigation measures would reduce impacts to a level less than significant.

Implementation of the CPU could increase residential density and/or commercial/industrial intensity and/or make changes to the Mobility Element beyond that identified in the GPU PEIR, which could result in physical divisions to established communities. Therefore, the proposed project could result in a potentially significant impact associated with physically dividing an established community, and further discussion in the SEIR is warranted.

b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

- | | | | |
|-------------------------------------|--|--------------------------|------------------------------|
| <input checked="" type="checkbox"/> | Potentially Significant Impact | <input type="checkbox"/> | Less than Significant Impact |
| <input type="checkbox"/> | Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> | No Impact |

Discussion/Explanation:

Potentially Significant Impact: The GPU PEIR determined that that implementation of the GPU would not conflict with applicable land use plans, policies, or regulations, and that direct and cumulative impacts would be less than significant.

The County General Plan is the guiding land use policy document for all areas under the County's jurisdiction. The CPU is proposed to be developed consistent with the General Plan. However, the potential exists that future projects developed under the CPU, could result in inconsistencies with the County General Plan or other applicable plans or regulations. Therefore, the proposed project could result in a potentially significant impact associated with conflicts with any land use plan, policy, or regulation, and further discussion in the SEIR is warranted.

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?

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

Would the project:

a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

- | | | | |
|-------------------------------------|--|--------------------------|------------------------------|
| <input checked="" type="checkbox"/> | Potentially Significant Impact | <input type="checkbox"/> | Less than Significant Impact |
| <input type="checkbox"/> | Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> | No Impact |

Discussion/Explanation:

Potentially Significant Impact: The GPU PEIR determined that future development would result in potentially significant direct and cumulative impacts associated with the loss of availability of mineral resources. While implementation of General Plan policies and mitigation measures would reduce direct and cumulative impacts related to the availability of mineral resources, impacts would not be fully mitigated and would remain significant and unavoidable.

In 1975, SMARA required the classification of land into Mineral Resource Zones (MRZs), according to the land's known or inferred mineral resource potential. The process was based solely on geology, without regard to existing land use or land ownership. The primary goal of classification is to ensure that the mineral potential of land is recognized by local government decision-makers and considered before they make land-use decisions that could preclude mining. The intent was that when resources were identified and the scarcity was verified, those lands would be protected for future extraction. However, many local governments must choose between mining and its most common competing land use, residential development.

Review of GPU PEIR Figure 2.10-1 determined that the Valley Center CPA is primarily underlain by cretaceous crystalline rocks and upper Jurassic metavolcanics, as well as a small portion of quaternary alluvium. The GPU PEIR states that Jurassic metavolcanic rock can be primarily quarried for coarse aggregates that are needed for concrete, riprap (broken rock) for breakwaters and bank protection, and decorative and dimension stone. Review of SANGIS data determined that approximately 30.6 acres of land along the northern CPA boundary are classified as MRZ-2. These areas are located adjacent to land within Pala-Pauma to the north that is also classified as MRZ-2 (GPU PEIR Figure 2.10-3). Approximately 3,403 acres of land within the southern portion of the CPA are classified as MRZ-3, and approximately 1,063 acres of land within the southern portion of the CPA are classified as MRZ-4. The remaining 50,724 acres of land within the Valley Center CPA have not been classified under any of the MRZ categories.

Implementation of the CPU could increase residential density and/or commercial/industrial intensity beyond that identified in the GPU PEIR, which could result in development that would preclude future use of known mineral resources. Therefore, the proposed project could result in a potentially significant impact related to the loss of known mineral resources, and further discussion in the SEIR is warranted.

b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: The GPU PEIR determined that future development would result in potentially significant direct and cumulative impacts associated with the loss of availability of locally important mineral resource recovery sites. While implementation of General Plan policies and mitigation measures would reduce direct and cumulative impacts related to the availability of locally important mineral resource recovery sites, impacts would not be fully mitigated and would remain significant and unavoidable.

Review of GPU PEIR Figure 2.10-2 determined that there are no active mineral resource extraction sites within the Valley Center CPA. Similarly, the existing Valley Center Community Plan does not identify any active mineral resource extraction sites. Therefore, the proposed

project would not result in the loss of availability of a locally important mineral resource recovery (extraction) site delineated on a local general plan, specific plan or other land use plan.

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?

YES NO

Would the project result in:

- a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

| | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

The County of San Diego General Plan, Noise Element, Tables N-1 and N-2 addresses noise sensitive areas and requires an acoustical study to be prepared for any use that may expose noise sensitive areas to noise in excess of a Community Noise Equivalent Level (CNEL) of 60 decibels (dBA) for single-family residences (including senior housing, convalescent homes), and 65 dBA CNEL for multi-family residences (including mixed-use commercial/residential). Moreover, if the project is excess of 60 dBA CNEL or 65 dBA CNEL, modifications must be made to the project to reduce noise levels. Noise sensitive areas include residences, hospitals, schools, libraries or similar facilities as mentioned within Tables N-1 and N-2 of the General Plan Noise Element (County of San Diego 2011a).

Potentially Significant Impact: The GPU PEIR determined that future development could result in potentially significant direct and cumulative impacts related to a substantial temporary or permanent increase in ambient noise levels in excess of established standards. However, the GPU PEIR determined that implementation of proposed GPU policies and mitigation measures would mitigate direct and cumulative impacts related to ambient noise levels in excess of established standards to a level less than significant.

Implementation of the CPU could increase residential density and/or commercial/industrial intensity and/or make changes to the Mobility Element beyond that identified in the GPU PEIR, which could result in the generation of substantial temporary or permanent noise increases compared to ambient levels. The CPU would not directly result in construction or operational activities that would generate temporary and permanent noise in excess of established standards. However, future projects implemented subsequent to adoption of the CPU could

generate temporary and permanent noise in excess of established standards. Therefore, the proposed project could result in a potentially significant impact, and further discussion in the SEIR is warranted.

b) Generation of excessive groundborne vibration or groundborne noise levels?

- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Potentially Significant Impact: The GPU PEIR determined that future development could result in potentially significant direct and cumulative impacts associated with the generation of excessive groundborne vibration or groundborne noise levels. However, the GPU PEIR determined that implementation of proposed GPU policies and mitigation measures would mitigate direct and cumulative impacts associated with groundborne vibration and groundborne noise to a level less than significant.

Implementation of the CPU could increase residential density and/or commercial/industrial intensity and/or make changes to the Mobility Element beyond that identified in the GPU PEIR, which could result in groundborne vibration or groundborne noise levels. The CPU would not directly result in construction or operational activities that would generate excessive groundborne vibration or groundborne noise. However, future projects implemented subsequent to adoption of the CPU could generate excessive groundborne vibration or groundborne noise levels. Therefore, the proposed project could result in a potentially significant impact, and further discussion in the SEIR is warranted.

c) 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, would the project expose people residing or working in the project area to excessive noise levels?

- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Potentially Significant Impact: The GPU PEIR determined that future development could result in potentially significant direct and cumulative impacts associated with exposing people residing or working in the project area to excessive noise levels from a private airstrip. However, the GPU PEIR determined that implementation of proposed GPU policies and mitigation measures, in addition to compliance with the 1990 California Airport Noise Standards and applicable Airport Land Use Compatibility, would mitigate direct and cumulative impacts associated with excessive noise levels from a private airstrip to a level less than significant.

The GPU PEIR determined that a total of 12,153 acres of noise sensitive land uses within the Valley Center CPA are located within two miles of one of four private airstrips: Blackinton, Lake Wohlford, Lyall-Roberts, and Pauma Valley Air Park (see Table 2.11-20 of the GPU PEIR). Future projects implemented subsequent to adoption of the CPU within these areas could result in development of additional noise sensitive land uses within two miles of these four private airstrips that could expose people to excessive noise levels. Therefore, the proposed project could result in a potentially significant impact, and further discussion in the SEIR is warranted.

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?

YES NO

Would the project:

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)?

Potentially Significant Impact Less than Significant Impact
 Less Than Significant With Mitigation Incorporated No Impact

Discussion/Explanation:

Potentially Significant Impact: The GPU PEIR determined that future development would not directly or indirectly induce unplanned population growth, nor contribute to a significant cumulative impact associated with population growth.

Implementation of the CPU could increase residential density and/or commercial/industrial intensity beyond that identified in the GPU PEIR, which could result in changes to land use intensity and coverage that may result in population growth that was not considered in the GPU PEIR. The project would also have the potential to indirectly induce growth because subsequent development could require the extension of infrastructure to accommodate growth. Therefore, the proposed project could result in a potentially significant impact, and further discussion in the SEIR is warranted.

b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less than Significant Impact: The GPU PEIR determined that future development would not displace a substantial number of people or housing, nor contribute to a significant cumulative impact associated with a displacement of people or housing.

Updates and refinements to the goals and policies of the existing Valley Center Community Plan would not result in the displacement of existing housing. Even if existing residential land uses are redesignated for non-residential uses, the project is not anticipated to displace existing people or housing. Approval of the CPU would not result in the loss of housing, and an additional action would be required prior to the removal of housing (i.e., an application would need to be submitted after CPU approval that proposes the removal of housing to a non-residential use). Therefore, the project would not displace substantial numbers of existing people or housing, and impacts would be less than significant.

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 public services?

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

Would the project:

a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance service ratios, response times or other performance objectives for any of the public services:

i. Fire protection?

- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Potentially Significant Impact: The GPU PEIR determined that future development would result in potentially significant direct and cumulative impacts associated with the provision of new or physically altered fire protection facilities. However, the GPU PEIR determined that implementation of proposed GPU policies and mitigation measures would mitigate direct and cumulative impacts associated with fire protection services to a level less than significant.

Fire protection services in Valley Center are provided by the Valley Center Fire Protection District (FPD) under a cooperative agreement with CAL FIRE (see Table 2.13-1 of the GPU PEIR). The GPU PEIR estimated that the Valley Center FPD served approximately 13,675 persons as of 2004, and would serve 32,910 persons at full GPU buildout (see Table 2.13-2 of the GPU PEIR). Existing personnel and service information for the Valley Center FPD will be updated as part of the SEIR. Implementation of the CPU may generate population growth that was not considered in the GPU PEIR, which may necessitate new or physically altered fire protection facilities. Therefore, the proposed project could result in a potentially significant impact, and further discussion in the SEIR is warranted.

i. Police protection?

- | | | | |
|-------------------------------------|--|--------------------------|------------------------------|
| <input checked="" type="checkbox"/> | Potentially Significant Impact | <input type="checkbox"/> | Less than Significant Impact |
| <input type="checkbox"/> | Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> | No Impact |

Discussion/Explanation:

Potentially Significant Impact: The GPU PEIR determined that future development would result in potentially significant direct and cumulative impacts associated with the need for new staffing and/or expanded police facilities to maintain acceptable response times for police protection services. However, the GPU PEIR determined that implementation of proposed GPU policies and mitigation measures would mitigate direct and cumulative impacts associated with police protection services to a level less than significant.

The San Diego County Sheriff's Department (SDSD) is the chief law enforcement agency in San Diego County. SDSD is the fourth largest Sheriff's Department in the U.S, has a service area of approximately 4,200 square miles, and serves a population of over 870,000 people. The Valley Center CPA is primarily served by the SDSD Valley Center Substation, which covers the communities of Valley Center, Pala/Pauma Valley, and Palomar (see Table 2.13-5 of the GPU PEIR). The GPU PEIR estimated that the Valley Center Sheriff District served 16,344 persons as of 2004, and estimated it would serve 37,110 at full GPU buildout (see Table 2.13-6 of the GPU PEIR). Implementation of the CPU may generate population growth that was not considered in the GPU PEIR, which may necessitate new or physically altered police protection facilities. Therefore, the proposed project could result in a potentially significant impact, and further discussion in the SEIR is warranted.

i. Schools?

- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Potentially Significant Impact: The GPU PEIR determined that future development would result in potentially significant direct and cumulative impacts associated with the need for new and/or expanded school facilities. However, the GPU PEIR determined that implementation of proposed GPU policies and mitigation measures would mitigate direct and cumulative impacts associated with school services to a level less than significant.

The Valley Center CPA is served by numerous school districts, including Bonsall Union Elementary, Escondido Union Elementary, Escondido Union High, Fallbrook Union High, and Valley Center – Pauma Unified (see Table 2.13-8 of the GPU PEIR). Implementation of the CPU may generate population growth that was not considered in the GPU PEIR, which may necessitate new or physically altered school facilities. Therefore, the proposed project could result in a potentially significant impact, and further discussion in the SEIR is warranted.

i. Parks?

- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Potentially Significant Impact: The GPU PEIR determined that the Valley Center CPA had a park and recreation acreage goal of 179 acres based on existing population, but only had 53 acres of park and recreation in the existing condition. Therefore, GPU PEIR determined that the Valley Center CPA had a park and recreation space acreage deficit of 126 acres. However, the GPU PEIR determined that implementation of proposed GPU policies and mitigation measures would mitigate direct and cumulative impacts associated with parks to a level less than significant.

Implementation of the CPU may generate population growth that was not considered in the GPU PEIR, which may necessitate new or physically altered parks. Therefore, the proposed project could result in a potentially significant impact, and further discussion in the SEIR is warranted. Parks and recreation are discussed in greater detail in Section XVI below.

i. Other public facilities?

- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Potentially Significant Impact: The GPU PEIR determined that future development would result in potentially significant direct and cumulative impacts associated with construction of new or expanded library facilities to accommodate new library users. However, the GPU PEIR determined that implementation of proposed GPU policies and mitigation measures would mitigate direct and cumulative impacts associated with library and other public services to a level less than significant.

Library services with the Valley Center CPA are provided by the Valley Center Branch Library. The GPU PEIR estimated that 6,856 square feet of library space is required to serve the population within the Valley Center CPA. The 14,068-square-foot Valley Center Branch Library exceeds this requirement by 7,212 square feet (see Table 2.13-12 of the GPU PEIR). It is anticipated that this additional 7,212 square feet of library space would be able to accommodate population growth that was not considered in the GPU PEIR. However, the potential remains that population growth that was not considered in the GPU PEIR may necessitate new or physically altered library facilities. Therefore, the proposed project could result in a potentially significant impact, and further discussion in the SEIR is warranted.

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 one or more substantial adverse physical impacts associated with recreation?

YES NO

Would the project:

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

Potentially Significant Impact Less than Significant Impact
 Less Than Significant With Mitigation Incorporated No Impact

Discussion/Explanation:

Potentially Significant Impact: The GPU PEIR determined that the Valley Center CPA had a park and recreation acreage goal of 179 acres based on existing population, but only had 53 acres of park and recreation in the existing condition. Therefore, the GPU PEIR determined that the Valley Center CPA had a park and recreation space acreage deficit of 126 acres. However, the GPU PEIR determined that implementation of proposed GPU policies and

mitigation measures would mitigate direct and cumulative impacts associated with parks to a level less than significant.

The project could generate population growth that was not considered in the GPU PEIR that could both increase the existing park and recreation space acreage deficit identified in the GPU PEIR and increase the use of existing neighborhood and regional parks or other recreational facilities. Therefore, the proposed project could result in a potentially significant impact, and further discussion in the SEIR is warranted.

b) Does the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?

- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Potentially Significant Impact: The GPU PEIR determined that implementation of the GPU would require the construction or expansion of recreation facilities that would result in potentially significant direct and cumulative impacts. However, the GPU PEIR determined that implementation of proposed GPU policies and mitigation measures would mitigate direct and cumulative impacts associated with construction or expansion of recreation facilities to a level less than significant.

Updates associated with the project may include identification of new or expanded recreation facilities. Therefore, the proposed project could result in a potentially significant impact, and further discussion in the SEIR is warranted.

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 one or more effects to air quality?

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

Would the project:

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

- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Potentially Significant Impact: Since certification of the GPU PEIR, the CEQA Guidelines were revised to provide new criteria for evaluating transportation impacts. Effective July 1, 2020, the Level of Service (LOS) metric, which was used in the GPU PEIR, is to be replaced by a Vehicle Miles Traveled (VMT) methodology for determining transportation impacts. The Office of Planning and Research (OPR) has released a Technical Advisory on Evaluating Transportation Impacts in CEQA (OPR 2018). A recommended threshold of significance provided by OPR that may be used is whether a project would generate VMT exceeding 15 percent below existing VMT per capita. The County is in the process of establishing criteria for evaluating VMT and the methodology used will ultimately be consistent with the County recommended thresholds currently in development.

Thus, while the GPU PEIR determined that significant and unavoidable impacts would occur at roadway segments within Valley Center, the SEIR will present transportation impacts in terms of VMT rather than LOS. However, the Traffic Impact Analysis (TIA) will provide disclosure of both a VMT and a LOS analysis to support the planning process.

The GPU PEIR determined that implementation of the GPU would create provisions for alternative modes of transportation, including bike lanes, bus stops, trails, and sidewalks. Many policies proposed in the General Plan Update would require coordination between the County and the agencies responsible for public transportation planning. Additionally, existing alternative transportation plans and policies would require modification to be consistent with the goals and policies contained in the GPU, which was considered to be potentially significant impact. However, the GPU PEIR determined that implementation of proposed GPU policies and mitigation measures, as well as compliance with applicable regulations, would reduce impacts related to alternative transportation to a level less than significant.

Implementation of the CPU could increase residential density and/or commercial/industrial intensity beyond that identified in the GPU PEIR, which could generate additional vehicular trips that would impact the effectiveness of the circulation system. Additionally, the proposed project would likely include policies that would support public transit and bicycle or pedestrian facilities. As these policies have not been developed, it is possible that conflicts with existing plans and policies related to circulation system may result. Therefore, the proposed project could result in a potentially significant impact. Transportation-related plans and policies addressed in the GPU PEIR in addition to plans adopted or in development since adoption of the GPU would be evaluated in the SEIR, including the Valley Center Road Corridor Concept Plan. A TIA will be prepared that utilizes the VMT methodology for the CEQA analysis while providing a LOS methodology for planning purposes only. This issue will be further discussed in the SEIR.

b) Would the project conflict or be consistent with CEQA Guidelines section 15064.3, subdivision (b)?

- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Potentially Significant Impact: Since certification of the GPU PEIR, the CEQA Guidelines Appendix G Environmental Checklist Form was revised to include a question addressing whether the proposed project would conflict or be consistent with CEQA Guidelines Section 15064.3, subdivision (b) which provides criteria for evaluating transportation impacts. Because this question was added to CEQA Appendix G after adoption of the 2011 GPU PEIR, potential impacts related to consistency with CEQA Guidelines Section 15064.3, subdivision (b) were not analyzed.

As described in Section XVII(a) above, implementation of the CPU could increase residential density and/or commercial/industrial intensity beyond that identified in the GPU PEIR, which could generate additional VMT. Therefore, the proposed project could result in a potentially significant impact. A TIA will be prepared that utilizes the VMT methodology consistent with CEQA Guidelines Section 15064.3 to evaluate potential impacts associated with VMT. This issue will be further discussed in the SEIR.

c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Potentially Significant Impact: The GPU PEIR determined that implementation of the GPU would result in the adoption of a Mobility Element Network that includes existing roadways with horizontal and vertical curves that are sharper than existing standards. Additionally, the GPU PEIR determined that implementation of the GPU would pose an increased risk to pedestrians and bicyclists by increasing and/or redistributing traffic patterns, and that implementation of the GPU would also have the potential to result in hazards associated with at-grade rail crossings. The GPU PEIR also determined that these impacts would be cumulatively considerable. While implementation of proposed GPU policies and mitigation measures, in addition to compliance with applicable regulations, would reduce direct and cumulative impacts related to roadway safety, impacts would not be fully mitigated and would remain significant and unavoidable.

Future projects implemented subsequent to adoption of the CPU could increase hazards due to a design feature or incompatible uses. Therefore, the proposed project could result in a potentially significant impact, and this issue will be further discussed in the SEIR.

d) Result in inadequate emergency access?

- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Potentially Significant Impact: The GPU PEIR determined that implementation of the GPU would result in existing inadequate roadway widths, dead-end roads, one-way roads, and gated communities continuing to occur in the unincorporated County, all of which have the potential to impair emergency access. However, incorporation of General Plan policies and mitigation measures, as well as compliance with applicable regulations, would mitigate impacts to a level below significant. It was also determined they would not contribute to a significant cumulative impact associated with emergency access.

Future projects implemented subsequent to adoption of the CPU could result in inadequate roadway widths, dead-end roads, one-way roads, and gated communities that would have the potential to impair emergency access. Therefore, the proposed project could result in a potentially significant impact, and this issue will be further discussed 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 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

Would the project:

- a) Cause a substantial adverse change in the significance of a tribal cultural resource, as defined in Public Resources Code §21074 as either a site, feature, place, or 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:
 - i. 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), or
 - ii. 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.

| | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Potentially Significant Impact: Since certification of the GPU PEIR, the CEQA Guidelines Appendix G Environmental Checklist Form was expanded to include impacts on tribal cultural resources. Because the component was added to CEQA Appendix G after adoption of the 2011 GPU PEIR, potential impacts on tribal cultural resources were not previously analyzed.

In order to identify the potential impacts to tribal cultural resources, the Native American Heritage Commission will be contacted to determine if sacred lands have been identified in the project area. Additionally, pursuant to Public Resources Code Section 21080.3.1 (Assembly Bill 52), California Native American tribes that are traditionally and culturally affiliated with the project area can request notification regarding projects in their traditional cultural territory. The County will extend an invitation to consult under Assembly Bill 52 to those tribes that are traditionally and culturally affiliated with the project area. Because tribal cultural resource impacts may be identified within the Valley Center CPA through this consultation process, further discussion will be provided 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?

YES NO

Would the project:

- a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

Potentially Significant Impact Less than Significant Impact
 Less Than Significant With Mitigation Incorporated No Impact

Discussion/Explanation:

Potentially Significant Impact: The GPU PEIR determined that implementation of the GPU would increase demand for water and wastewater services, requiring the construction of new facilities that would result in potentially significant direct impacts. However, the GPU PEIR determined that implementation of proposed GPU policies and mitigation measures would mitigate direct and cumulative impacts associated with construction or expansion of recreation facilities to a level less than significant.

Implementation of the CPU may generate population growth that was not considered in the GPU PEIR, which may necessitate relocation or construction of new or expanded water,

wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities. Therefore, the proposed project could result in a potentially significant impact, and further discussion in the SEIR is warranted.

- b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

- | | | | |
|-------------------------------------|--|--------------------------|------------------------------|
| <input checked="" type="checkbox"/> | Potentially Significant Impact | <input type="checkbox"/> | Less than Significant Impact |
| <input type="checkbox"/> | Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> | No Impact |

Discussion/Explanation:

Potentially Significant Impact: The GPU PEIR determined that implementation of the GPU would result in potentially significant direct and cumulative impacts associated with the provision of adequate water supplies. While implementation of proposed GPU policies and mitigation measures, in addition to compliance with applicable regulations, would reduce direct and cumulative impacts related to water supply, impacts would not be fully mitigated and would remain significant and unavoidable.

Implementation of the CPU may generate population growth that was not considered in the GPU PEIR, which may result in further impacts related to water supply. Therefore, the proposed project could result in a potentially significant impact, and further discussion in the SEIR is warranted.

- c) Result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

- | | | | |
|-------------------------------------|--|--------------------------|------------------------------|
| <input checked="" type="checkbox"/> | Potentially Significant Impact | <input type="checkbox"/> | Less than Significant Impact |
| <input type="checkbox"/> | Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> | No Impact |

Discussion/Explanation:

Potentially Significant Impact: The GPU PEIR determined that implementation of the GPU would increase demand on existing wastewater systems, which would result in potentially significant direct impacts. However, the GPU PEIR determined that implementation of proposed GPU policies and mitigation measures would mitigate direct impacts associated with wastewater facilities to a level less than significant.

Implementation of the CPU may generate population growth that was not considered in the GPU PEIR, which may result in further impacts related to wastewater capacity. Therefore, the proposed project could result in a potentially significant impact, and further discussion in the SEIR is warranted.

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?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less than Significant Impact: The GPU PEIR determined that implementation of the GPU would result in potentially significant direct and cumulative impacts associated with landfill capacity. While implementation of proposed GPU policies and mitigation measures, in addition to compliance with applicable regulations, would reduce direct and cumulative impacts related to landfill capacity, impacts would not be fully mitigated and would remain significant and unavoidable.

Implementation of the CPU may result in increased density that was not considered in the GPU PEIR, which may in turn generate additional solid waste that could further exceed existing landfill capacity. Therefore, the proposed project could result in a potentially significant impact, and further discussion in the SEIR is warranted.

e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less than Significant Impact: The GPU PEIR determined that future development would not conflict with applicable solid waste regulations, and direct and cumulative impacts would be less than significant.

Implementation of the CPU may result in increased density that was not considered in the GPU PEIR, which may in turn generate additional solid waste that may conflict with existing solid waste regulations. Therefore, the proposed project could result in a potentially significant impact, and further discussion in the SEIR is warranted.

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?

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

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:

Would the project:

a) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

- | | | | |
|-------------------------------------|--|--------------------------|------------------------------|
| <input checked="" type="checkbox"/> | Potentially Significant Impact | <input type="checkbox"/> | Less than Significant Impact |
| <input type="checkbox"/> | Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> | No Impact |

Discussion/Explanation:

Potentially Significant Impact: The GPU PEIR determined that implementation of the GPU would result in potentially significant direct and cumulative impacts related to wildland fires. While implementation of General Plan policies and mitigation measures would reduce impacts related to wildland fires, impacts would not be fully mitigated and would remain significant and unavoidable.

Although fires can occur anywhere in the County, fires near the Wildland Urban Interface (WUI) areas pose a serious threat to personal safety and structures due to rapid spread and the extreme heat that these fires often generate. The California Department of Forestry and Fire Protection (CAL FIRE) has mapped areas with significant fire hazards in the county through its Fire and Resource Assessment Program. These maps place areas of the county into different Fire Hazard Severity Zones (FHSZs) according to fuel, terrain, weather, and other relevant factors. Federal Responsibility Areas are areas where the U.S. Forest Service is responsible for wildfire protection. State Responsibility Areas are areas where CAL FIRE is responsible for wildfire protection. The FHSZs are divided into three levels of fire hazard severity: moderate, high, and very high. Fire threat areas have also been mapped by CAL FIRE. This data combines expected fire frequency with potential fire behavior to create four threat classes.

Review of the GPU PEIR determined that 54,362 acres of land within the Valley Center CPA are classified as WUI areas (see Table 2.7-7 of the GPU PEIR). Review of CAL FIRE FHSZ mapping determined that approximately 29,208 acres of land within the Valley Center CPA have been designated under the Very High FHSZ category, 2,674 acres have been designated under the High FHSZ category, and 23,196 have been designated under the Moderate FHSZ category. Approximately 243 acres have been designated under the Non-Wildland/Non-Urban FHSZ category. Consequently, the majority of land within the Valley Center CPA is subject to fire risk. Implementation of the CPU may result in increased development, causing additional land to be designated as WUI areas that were not considered in the GPU PEIR. Similarly, this increased development may be located within areas designated under FHSZ categories ranging from Very High to Moderate that could be subject to fire risk. Therefore, the proposed project could result in a potentially significant impact, and further discussion in the SEIR is warranted.

b) Substantially impair an adopted emergency response plan or emergency evacuation plan?

- | | | | |
|-------------------------------------|--|--------------------------|------------------------------|
| <input checked="" type="checkbox"/> | Potentially Significant Impact | <input type="checkbox"/> | Less than Significant Impact |
| <input type="checkbox"/> | Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> | No Impact |

Discussion/Explanation:

Potentially Significant Impact: Since certification of the GPU PEIR, the CEQA Guidelines Appendix G Environmental Checklist Form was expanded to include an evaluation of impacts related to wildfire. Because the component was added to CEQA Appendix G after adoption of the 2011 GPU PEIR, potential impacts related to impairment of an adopted emergency response plan or emergency evacuation plan was not analyzed. However, this new threshold is similar to the Hazards and Hazardous Materials threshold (e) that is presented in Section IX(a) above. With respect to Hazards and Hazardous Materials threshold (e), the GPU PEIR determined that future development had the potential to be located in areas that result in potentially significant impacts related to emergency response and evacuation plans. However, the GPU PEIR determined that implementation of GPU policies and mitigation measures, as well as compliance with applicable regulations, such as the Multi-Jurisdictional Hazard Mitigation Plan and the Dam Evacuation Plan, would reduce impacts to a level less than significant.

As described in Section IX(a) above, applicable emergency response plan requirements are set forth by the County of San Diego Office of Emergency Services and other local police and fire departments within or adjacent to the Valley Center CPA through the Operational Area Emergency Plan, a comprehensive emergency plan that defines responsibilities, establishes an emergency organization, defines lines of communications, and integrates with the statewide Standardized Emergency Management System. The County of San Diego has a number of emergency response or emergency evacuation plans that are applicable to the Valley Center CPA. While Section IX(a) above determined that the proposed project would not conflict with many of these plans, the potential remains that future development could conflict with adopted emergency response or evacuation plans applicable to Valley Center. Therefore, the proposed project could result in a potentially significant impact, and further discussion in the SEIR is warranted.

c) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentration from a wildfire or the uncontrolled spread of a wildfire?

- | | | | |
|-------------------------------------|--|--------------------------|------------------------------|
| <input checked="" type="checkbox"/> | Potentially Significant Impact | <input type="checkbox"/> | Less than Significant Impact |
| <input type="checkbox"/> | Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> | No Impact |

Discussion/Explanation:

Potentially Significant Impact: Since certification of the GPU PEIR, the CEQA Guidelines Appendix G Environmental Checklist Form was expanded to include an evaluation of impacts

related to wildfire. Because the component was added to CEQA Appendix G after adoption of the 2011 GPU PEIR, potential impacts related to exposure to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire was not analyzed.

As described in Section XX(a) above, the overwhelming majority of land within the Valley Center CPA has been classified as WUI areas or designated under FHSZ categories ranging from Very High to Moderate. Consequently, the majority of land within the Valley Center CPA is subject to fire risk. Implementation of the CPU may result in significant environmental impact related to exposure to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. Therefore, the proposed project could result in a potentially significant impact, and further discussion in the SEIR is warranted.

d) 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?

- | | | | |
|-------------------------------------|--|--------------------------|------------------------------|
| <input checked="" type="checkbox"/> | Potentially Significant Impact | <input type="checkbox"/> | Less than Significant Impact |
| <input type="checkbox"/> | Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> | No Impact |

Discussion/Explanation:

Potentially Significant Impact: Since certification of the GPU PEIR, the CEQA Guidelines Appendix G Environmental Checklist Form was expanded to include an evaluation of impacts related to wildfire. Because the component was added to CEQA Appendix G after adoption of the 2011 GPU PEIR, potential impacts related to installation or maintenance of associated infrastructure that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment was not analyzed.

Implementation of the CPU may result in significant environmental impacts related to installation or maintenance of associated infrastructure that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment. Therefore, the proposed project could result in a potentially significant impact, and further discussion in the SEIR is warranted.

e) 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?

- | | | | |
|-------------------------------------|--|--------------------------|------------------------------|
| <input checked="" type="checkbox"/> | Potentially Significant Impact | <input type="checkbox"/> | Less than Significant Impact |
| <input type="checkbox"/> | Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> | No Impact |

Discussion/Explanation:

Potentially Significant Impact: Since certification of the GPU PEIR, the CEQA Guidelines Appendix G Environmental Checklist Form was expanded to include an evaluation of impacts related to wildfire. Because the component was added to CEQA Appendix G after adoption of

the 2011 GPU PEIR, potential impacts related to exposure of 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 was not analyzed.

As described in Section XX(a) above, the overwhelming majority of land within the Valley Center CPA has been classified as WUI areas or designated under FHSZ categories ranging from Very High to Moderate. Consequently, the majority of land within the Valley Center CPA is subject to fire risk. Implementation of the CPU may result in significant environmental impacts related to exposure of 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. Therefore, the proposed project could result in a potentially significant impact, and further discussion in the SEIR is warranted.

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 cause effects to utilities and service systems?

YES NO

Would the project:

- a) 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?

Potentially Significant Impact Less than Significant Impact
 Less Than Significant With Mitigation Incorporated No Impact

Discussion/Explanation:

Potentially Significant Impact: The GPU PEIR determined that implementation of the GPU could result in potentially significant impacts on vegetation and wildlife species, which could cause populations to drop below self-sustaining levels or reduce the number or restrict the range of a rare or endangered plant or animal species. While implementation of General Plan policies and mitigation measures would reduce impacts on vegetation and wildlife species, impacts would not be fully mitigated and would remain significant and unavoidable. Additionally, GPU PEIR determined that implementation of the GPU would result in potentially significant direct and cumulative impacts associated with historical and archaeological resources, which could result in impacts on major periods of California history or prehistory. However, the GPU PEIR determined that implementation of proposed GPU policies and

mitigation measures would mitigate impacts associated with historical and archaeological resources to a level less than significant.

Per the instructions for evaluating environmental impacts in this Initial Study, 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, the SEIR evaluation will consider the project's potential for significant cumulative effects.

The proposed project involves an update to the existing Valley Center Community Plan to guide future growth and development within Valley Center. While the proposed project would likely include policies that would intend to improve the quality of the environment, including wildlife habitat, historical resources, and archaeological resources, implementation of the CPU may result in development of additional land that was not considered in the GPU PEIR, which may in turn impact the quality of the environment. Therefore, the proposed project could result in a potentially significant impact, and further discussion in the SEIR is warranted.

b) 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)?

- | | | | |
|-------------------------------------|--|--------------------------|------------------------------|
| <input checked="" type="checkbox"/> | Potentially Significant Impact | <input type="checkbox"/> | Less than Significant Impact |
| <input type="checkbox"/> | Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> | No Impact |

Discussion/Explanation:

Potentially Significant Impact: The GPU PEIR determined that implementation of the GPU would result in potentially significant cumulative impacts related to aesthetics (visual character or quality and light or glare), agricultural resources (conversion of farmland and indirect conversion of farmland), air quality (air quality violations, non-attainment criteria pollutants, and sensitive receptors), biological resources (special-status plant and wildlife species, riparian habitat and other sensitive natural communities, and wildlife movement corridors and nursery sites), hazards and hazardous materials (wildland fires), hydrology and water quality (water quality standards and requirements, groundwater supplies, and recharge), mineral resources (mineral resource availability and mineral resource recovery sites), noise (permanent increase in ambient noise levels), public services (school services), transportation and traffic (unincorporated County traffic and LOS standards and road safety), and utilities and service systems (adequate water supplies and sufficient landfill capacity).

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 proposed

project could result in potentially significant impacts to numerous environmental categories. Even issues that were found to be less than significant with implementation of the project could contribute to a cumulatively significant impact. Therefore, potential cumulative impacts related to all potentially significant environmental categories will be evaluated in the SEIR.

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

- | | | | |
|-------------------------------------|--|--------------------------|------------------------------|
| <input checked="" type="checkbox"/> | Potentially Significant Impact | <input type="checkbox"/> | Less than Significant Impact |
| <input type="checkbox"/> | Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> | No Impact |

Discussion/Explanation:

Potentially Significant Impact: The GPU PEIR determined that substantial adverse direct and indirect effects on human beings would result due to the significant and unavoidable impacts associated with implementation of the GPU.

In the evaluation of environmental impacts in this Initial Study, the potential for adverse direct or indirect impacts to human beings were considered in the response to certain questions in this Initial Study. As a result of this evaluation, there were determined to be potentially significant effects related to human beings related to several issues including but not limited to air quality, hazards and hazardous materials, noise, and population and housing. Therefore, further discussion of all these environmental categories in the SEIR is warranted.

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 www.leginfo.ca.gov. For County regulation refer to www.amlegal.com. All other references are available upon request.

California Department of Toxic Substances Control (DTSC)

2020 Envirostor Database.

<https://www.envirostor.dtsc.ca.gov/public/map/?myaddress=Valley+Center%2C+CA>.

Office of Planning and Research (OPR)

2018 Technical Advisory on Evaluating Transportation Impacts in CEQA.

San Diego Air Pollution Control District (SDAPCD)

2012 Redesignation Request and Maintenance Plan for the 1997 National Ozone Standard for San Diego County. Adopted December 5, 1012.

(https://www.sdapcd.org/content/dam/sdc/apcd/PDF/Air%20Quality%20Planning/8_Hour_O3_Maint-Plan.pdf).

2016a 2016 Revision of the Regional Air Quality Strategy for San Diego County. Final December 2016.

(<https://www.sdapcd.org/content/dam/sdc/apcd/PDF/Air%20Quality%20Planning/2016%20RAQS.pdf>).

2016b 2008 Eight-Hour Ozone Attainment Plan for San Diego County. Final December 2016.

(<https://www.sdapcd.org/content/dam/sdc/apcd/PDF/Air%20Quality%20Planning/8-Hr-O3%20Attain%20Plan-08%20Std.pdf>).

San Diego, County of

2011a San Diego County General Plan Update.

<http://www.sandiegocounty.gov/pds/generalplan.html>.

2011b San Diego County General Plan Update Program Environmental Impact Report.

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

State Water Resources Control Board (SWRCB)

2020 Geotracker Database.

<https://geotracker.waterboards.ca.gov/map/?CMD=runreport&myaddress=Valley+Center%2C+CA>.

United States Department of Agriculture Forest Service

2016 Forest Inventory and Analysis Glossary. <https://www.nrs.fs.fed.us/fia/data-tools/state-reports/glossary/>.