

CHAPTER 4.0 PROJECT ALTERNATIVES

4.1 Rationale for Alternative Selection

Alternatives range from no development to a 34-lot clustered design. Each offers environmental advantages over the Proposed Project. The No Development Alternatives (NDA) was selected to evaluate the environmental effect if no use or a minimal use such as livestock grazing were established on the site. A No Project/Legal Lot (NPLL) Alternative was selected to represent the probable actions that would take place if the Proposed Project were to not go forward. This would be estate residential and agricultural uses on each of the four legal lots.

The Reduced Project Alternative (RPA) was selected to assess the environmental effects of a project with 14 lots, which allows more area on each lot for agriculture. Finally, the Consolidated Project Alternative (CPA), a 34-lot project incorporating lots less than 40 acres in size was selected to assess environmental effects if no agriculture is proposed and lot sizes are reduced.

No alternative location is proposed in the **DEIR/FEIR**. Proximity to Julian is an important factor for the Proposed Project due to the town’s unique historic character combined with its successful agri-tourism economy. Therefore an alternative site must be focused in that area. The location limits the variability of many environmental characteristics. For example, traffic impacts would be similar because SR 78/79 is the only major roadway in the region; any project located in the region would have impacts to that road. Natural habitats in the area share many attributes given the similarity of climate and topography.

The Proposed Project’s large size – approximately 1,416.5 acres – also makes it difficult to locate sizable holdings in the Julian area that share the topographic, land use planning, and agricultural characteristics of this site. Additionally, the site is under a Williamson Act contract, which is a key aspect of the site design. Due to the unique local and specific project characteristics, no alternative location is discussed.

4.2 No Development Alternative (NDA)

The No Development Alternative (NDA) provides an analysis of the site were no development to be pursued on the project site. Grazing/cattle breeding would continue onsite. Existing fencing would remain. The NDA would not conflict with current land use designations and zoning, and would be consistent with the General Plan. ~~No fire station site would be provided to the Julian/Cuyamaca Fire Protection District (JCFPD) with this alternative.~~

No significant effects would result from this alternative. The NDA reduces all three of the Proposed Project’s significant effects: biology, cultural resources, and traffic. Agricultural impacts are also reduced. The NDA meets two of the six Proposed Project objectives. Rural character and natural resources of the site are preserved. However, four objectives are not met because no subdivision would take place, the Williamson Act contract would not be modified, and no infrastructure would be provided, ~~and no fire station site would be provided~~. This alternative is environmentally superior to the Proposed Project and the other alternatives because it would not have any significant environmental effects. Figure S-2, “Aerial Photograph,” provides a view of the site that reflects this approach.

4.2.1 Analysis of NDA Effects

4.2.1.1 *Biology*

The NDA would not change the existing conditions on the site in the short term. Existing fencing would deter unauthorized intrusions. If grazing were to be reestablished, the expectation would be that some biological resources would be impacted by trampling and grazing. The agricultural activity is expected to be extensive but not intensive, due to the type of habitat and terrain and a conservation oriented approach favored by the applicant. As documented in the biological report, the site supports a rich array of habitats, despite many years of grazing in the past. The overall biological status of the property would not be expected to change under the NDA, although impacts to specific localized species cannot be ruled out. These effects are non-specific and speculative. In general, impacts would not be significant. NDA impacts are less than Proposed Project levels because little or no habitat would be impacted, versus impacts to approximately [206.9201.9](#) acres under the Proposed Project.

Cumulative impacts are not significant because the NDA would not significantly impact any sensitive habitat. Impacts are reduced from Proposed Project levels because it has no biological impacts while TM 5312RPL³ impacts [206.9201.9](#) acres. In summary, NDA's project-level and cumulative biological impacts are not significant, and are reduced from Proposed Project levels.

4.2.1.2 *Cultural Resources*

Forty-five archaeological sites have been found on the Proposed Project Site. The NDA would avoid direct and indirect impacts to these sites because no development is proposed. Indirect impacts could occur because sites would be unprotected and would be subject to human encroachment. However the site would be fenced and no residential component would be established so the potential for impacts is reduced. Generally the sites would remain undisturbed and impacts would be less than significant.

The NDA impacts to cultural resources are less than those produced by the Proposed Project because no development would take place in proximity to cultural resources and no permanent human presence would be established on the site that would create indirect impacts. The Proposed Project would establish a permanent human presence on the site that could result in indirect archaeological impacts.

The NDA would not have impacts to the site's cultural resources and therefore would not contribute to a cumulative impact. Its impact is reduced from Proposed Project levels because the Proposed Project could have indirect impacts to resources.

In summary, the NDA does not have project or cumulative impacts to cultural resources and its impacts are reduced from Proposed Project levels.

4.2.1.3 *Transportation and Traffic*

The NDA would not put any new traffic on the roads in the short term. Traffic associated with transporting and maintaining livestock, thought minimal, would continue. The NDA would not contribute to cumulatively significant impacts because there would be no additional traffic added to roadways.

NDA impacts are reduced at both the project and cumulative levels because little or no additional traffic is generated, while the Proposed Project generates 1,278 ADT. In summary, the NDA's project and cumulative traffic impacts are not significant, and are reduced from Proposed Project levels.

4.3 No Project/Legal Lot Alternative (NPLL)

The No Project/Legal Lot Alternative (NPLL) provides an analysis of the site if the Proposed Project were not to go forward and legal lots on the site were sold individually and developed. The four legal lots would be developed with single family residences. Agricultural use could continue as long as the property owners remained under the Williamson Act contract Figure 4-3-1, "No Project Legal Lot Alternative," shows the legal lots. As shown, the entire western part of the site would be one 1,840-acre lot and the eastern part would be three lots ranging in size from 130 to 242 acres. The road network would generally follow the main road of the Proposed Project to allow for adequate fire access from two exit points. It is expected the western-most lot would take access from Hoskings Ranch Road, and the three eastern lots would take access from Pine Hills Road.

The NPLL would not conflict with HGP land use designations and zoning, and would be consistent with the General Plan. ~~No fire station lot would be provided to the Julian/Cuyamaca Fire Protection District under this alternative.~~ The NPLL would likely preserve the present tableau of rolling and steep hills, grasslands, and oak woodland. It should be noted, however, that individual lots could be cleared and used in more extensive ways. It is speculative to predict these potential additional effects so the analysis assumes a single estate residential use limited to ten acres per lot.

There would be significant effects to biology, cultural resources, and traffic resulting from this alternative. However, the NPLL reduces all three significant effects from Proposed Project levels because the NPLL would result in 20-fewer lots. The NPLL has the following effects that are not considered significant: aesthetics, agricultural resources, air quality/global climate change, geology, groundwater, fire, and surface water quality. The NPLL meets three of the six project objectives. The site's rural character and natural resources are preserved. However, ~~two~~ ^{three} objectives are not met because no subdivision would take place, and the Williamson Act contract would not be modified, ~~and no fire station site would be provided.~~

4.3.1 Analysis of NPLL Effects

4.3.1.1 Biology

The NPLL would impact approximately 40 acres of land for the construction of pads, and roads on four lots. Existing agriculture could continue since the lots would remain under the Williamson Act in the near term. Impacted habitat would occur in widely dispersed areas on the site. Indirect impacts from human intrusion into biologically sensitive areas are also possible. Mitigation in the form of habitat preservation could be provided from the resources within each lot because the habitat required for mitigation is in abundance on those lots. However, because CEQA provides an exemption for individual residences, these effects may not be assessed or mitigated. Should additional agricultural uses be introduced, this impact area could be greater. Impacts are significant and mitigation would be required. Mitigation would consist of open space preservation.

NPLL impacts are less than those of the Proposed Project because the NPLL impacts approximately ~~199.9~~ 194.9 acres while the Proposed Project impacts

[206.9201.9](#) acres. Impacts are also less intensive, with wide separations between impact areas.

Cumulative impacts are not significant because the NPLL would not contribute to a regionally significant reduction in biological resources. While sensitive habitats would be impacted, these occur in the context of larger areas of habitat that would be preserved. Three other projects in the area have biological impacts. Specifically MUP 77-113 protected all its oaks, SP 02-029 impacted 20 oaks, TM 4489 impacts 6-11 sensitive trees. These impacts are widely dispersed and limited in nature and do not inhibit the overall biological integrity of habitats regionally. Therefore, cumulative impacts are not significant.

In summary, NPLL's project-level impacts to biology are significant but are reduced from Proposed Project levels. Cumulative biological impacts are not significant, and are reduced from Proposed Project levels.

4.3.1.2 Cultural Resources

Forty-five historical and archaeological sites have been found on the property. The NPLL could avoid direct impacts to these sites because there is ample room on each lot to site a residence while avoiding cultural resources. However, potential impacts might occur due to the CEQA exemption for single family residences. Indirect impacts could occur unless archaeological resources were protected. This would be an indirect long-term impact.

The NPLL could have indirect impacts to the site's cultural resources because human intrusions could occur. Impacts could be potentially significant. Open space and appropriate barriers could be required to protect sensitive resources near residences. However, due to the CEQA exemption noted above, this may not occur.

The NPLL impacts to cultural resources would be less than those produced by the Proposed Project because only four residences would be located on 1,416.5 acres, so less development would take place in proximity to cultural resources. The Proposed Project would establish a permanent human presence on the site on 24 lots in closer proximity to archaeological resources.

The cumulative impact study area has two projects with cultural resource impacts in addition to the NPLL. These are SP-03-015 and MUP 72-460-12. MUP 72-460-12 mitigated its impacts, while impacts from SP-03-015 are unspecified at this time. Cumulative impacts are not significant due to the limited scope of impacts and the County of San Diego's mitigation requirements for all cultural resource impacts. No mitigation is required.

In summary, the NPLL has project-level impacts but does not have cumulative impacts. Impacts in both cases are reduced from Proposed Project levels. Mitigation consists of open space protection for resources that are near a development site.

4.3.1.3 Transportation and Traffic

The NPLL would put an estimated 48 ADT on area roadways. This amount of traffic would not degrade existing levels of service for roadway segments or intersections in the area. Project level impacts are not significant. Development in the County is subject to a Traffic Impact Fee (TIF) to mitigate potential cumulative impacts. While reduced from Proposed Project levels, this payment would be required because the

new residents would use area roadways that currently operate at cumulatively deficient levels of service.

NPLL impacts are reduced at both the project and cumulative levels because less traffic is generated, 48 versus 1,278 ADT. Sight distance improvements and TIF fee payments are required in either case, however.

In summary, the NPLL's project and cumulative traffic impacts are significant, and are reduced from Proposed Project levels. The NPLL would create significant cumulative impacts, and payment of a TIF would be required.

4.4 Reduced Project Alternative (RPA)

The Reduced Project Alternative (RPA) proposes 14 lots, a 42 percent reduction from the 24 lots proposed. Figure 4-4-1, "Reduced Project Alternative," provides a concept of this design. Lot sizes would range from 42 to 240 acres and would be dispersed throughout the site. The road network would be similar to the Proposed Project.

The RPA assumes that agricultural uses would continue on the site. This alternative was selected to provide an understanding of the environmental effects of a project with reduced density, more area for agriculture, and more open space.

The RPA would have significant effects to biology, cultural resources, and traffic. However, the RPA reduces all three significant effects from Proposed Project levels because the RPA would result in 10-fewer lots. It has the following effects that are not considered significant: aesthetics, agricultural resources, air quality/global climate change, geology, groundwater, fire, and surface water quality.

The RPA meets five of the six project objectives. The site's rural character and many of the natural resources are preserved. While the RPA achieves the goal of creating a subdivision, this level of development may not be economically feasible. The Williamson Act can be modified and infrastructure is provided. ~~However, one objective is not met because no fire station site would be provided due to the reduced economic scope of the project.~~ After the No Project Alternative, this alternative is environmentally superior to the Proposed Project.

4.4.1 Analysis of RPA Effects

4.4.1.1 Biology

The RPA has direct biological impacts over approximately 44 acres for roads and pads. An additional area of 250 acres would potentially be devoted to agriculture, but would be located on habitats that are compatible with grazing/cattle breeding. The RPA would impact Engelmann Oak Woodland, Mixed Oak Woodland, Coast Live Oak, Non-native Grassland, and Flat-topped Buckwheat. Biological impact would be significant and mitigation would be required. Impacts could be mitigated on site because the area available for mitigation is extensive.

The RPA reduces direct biological impacts from Proposed Project levels by 153 acres, or approximately 74 percent. Impacts to sensitive habitats are mitigated onsite, similar to the Proposed Project. Indirect impacts are reduced because density is lower and fewer people would be living on the site.

Cumulative impacts are not significant due to the limited number of projects in the area with biological impacts. While sensitive habitats would be impacted, these occur in the context of larger areas of habitat that would be preserved. Three other projects in the area have biological impacts: MUP 77-113 protected all its oaks, SP 02-029

impacted 20 oaks and TM 4489 impacts 6-11 sensitive trees. These projects and the RPA have limited impacts on biology, and due to project design, they do not disturb regionally important corridors. Because the RPA preserves large regionally-important biological areas, and due to the limited nature of cumulative impacts, cumulative impacts are not significant and no mitigation is required.

In summary, direct and indirect impacts are significant but mitigable. Impacts are reduced from Proposed Project levels. Cumulative impacts are not significant and are reduced from Proposed Project levels. Mitigation consists of protections for the open space design.

4.4.1.2 Cultural Resources

The RPA avoids direct impacts to cultural resources by avoiding sensitive areas and setting aside open space that protects resources. All unexcavated sites would be considered significant and would be preserved in open space. Other undiscovered resources could occur in graded areas. Direct short-term impacts are significant and mitigation is required. Monitoring of grading by an archaeologist and ~~an~~ Native American representative would ensure that if resources are uncovered, they would be appropriately handled. [The archaeological consultant, County staff, and Native American representatives will work together to determine the disposition of any Native American cultural material collected, determining if some material would be repatriated rather than curated, taking into account the definitions under NAGPRA. Historic era cultural material collected would be curated.](#)

The RPA reduces impacts from Proposed Project levels. While both projects avoid significant resources, the RPA introduces fewer people into the area and as a result, indirect impacts from the RPA are reduced. Overall grading for roads is similar, but pad grading is reduced; therefore the potential to disturb unknown resources would be reduced. Open space protection and monitoring during grading would still be necessary for the RPA.

Cumulative impacts relative to Cultural Resources are not significant. The cumulative impact study area contains two projects with cultural resource impacts in addition to the RPA: SP-03-015 and MUP 72-460-12. MUP 72-460-12 mitigated its impacts, while impacts from the are unspecified at this time. Sites are one and two miles apart, thereby diminishing the possibility that impacts occur on a single site or group of sites. Cumulative impacts are not significant due to the limited scope of impacts and the dispersed locations of the projects. No mitigation is required.

In summary, the RPA has significant short-term project-level impacts. Impacts are reduced from the Proposed Project levels. Cumulative impacts are not significant and are reduced from Proposed Project levels. Mitigation consists of open space protection and monitoring during grading.

4.4.1.3 Transportation and Traffic

The RPA would put an estimated 168 residential ADT on area roadways. This amount of traffic would not degrade existing levels of service for roadway segments or intersections in the area. Deficient sight distance at SR 78/79/Pine Hills Road intersection and at the Pine Hills/Project Entry intersection would be addressed by trimming trees near the roadway. No impacts are expected.

The RPA generates 168 residential ADT, in contrast to the Proposed Project, which generates 1,218 residential ADT. The RPA also produces a similar amount of

agricultural traffic because the agricultural areas under the RPA are similar to those of the Proposed Project where a similar grazing design is used. Impacts are reduced at both the project and cumulative levels because less traffic is generated. Sight distance improvements and TIF fee payments are required for both the RPA and the Proposed Project, however.

Cumulative impacts are significant because the project would contribute to traffic on regional roadways that currently operate at deficient levels of service. Mitigation is required. Payment of TIF fees would mitigate this impact by contributing to the funding of roadway improvements that are operating at deficient levels.

In summary, the RPA's project traffic impacts are significant due to insufficient sight distance on Pine Hills Road; however, ADT are reduced from Proposed Project levels. The RPA has significant cumulative impacts, although they are reduced from Proposed Project levels. Mitigation would consist of removing sight distance obstructions on Pine Hills Road and paying a TIF.

4.5 Consolidated Project Alternative

The Consolidated Project Alternative (CPA) proposes 34 lots focused in the eastern and north central part of the site. Figure 4-5-1, "Consolidated Project Alternative," provides the layout for this approach. The south-central and western parts of the site are protected in open space, as shown in Figure 4-5-2, "Consolidated Project Alternative Open Space." The CPA has significant impacts to biology, cultural resources, and traffic. The following effects are not significant: aesthetics, agricultural resources, air quality/global climate change, geology, groundwater, fire, and surface water quality. The agricultural analysis for the CPA, "Agricultural Conversion Analysis for Hoskings Ranch 34-Lot Alternative TM5312RPL³Alt", by TRS Consultants, dated January 2013, is provided as Appendix Q. A Stormwater Management Plan (SWMP) and Hydromodification analysis were performed for the CPA, "Technical Appendices Addendum to SWMP for 34-Lot Alternative Major Stormwater Management Plan / Hydro Modification," by Masson & Associates, dated March 13, 2013, is provided as Appendix R to this EIR. A visual study was conducted for the CPA as well, "Visual Resources Impact Report for the Consolidated Project Alternative Hoskings Ranch," by TRS Consultants, dated September 2012, is provided as Appendix S to this [DEIR/FEIR](#).

The CPA proposes 34 lots on 1,416.5 acres. Total development area is [499.9194.9](#) acres, including pads, roads and fire clearing areas. The rest of the site, [1,216.91,221.9](#) acres, or 86 percent, would be retained in protected open space.

Lots are focused on two areas. Twenty-four lots are consolidated in the east adjacent to SR 78/79 and Pine Hills Road, and 10 lots are located in the north-central area of the site. Figure 4-5-1, provides a basic view of the use areas proposed with this design and highlights the area that would be preserved in open space. Lot sizes vary from 11.8 to 709.3 acres, although average lot size remains 40 acres. One lot would consist of 709.41 acres and would encompass the entire western and most of the southern parts of the site. See Figure 4-5-3, "Open Space, Signage , and Fencing Plan for Consolidated Project Alternative". The Williamson Act contract currently in effect would remain on the 709.41-acre lot, and the contract would be terminated over the remaining 702.09 acres. The consolidated lot design calls for lots smaller than the minimum lot size of 40 acres allowed by the contract. The applicant would file for termination in accordance with Board of Supervisor's Policy I-38, Section 6, "Cancellation of Contract." This would entail making findings and the payment of a cancellation fee equal to 12.5 percent of the cancellation valuation of the property taken out of the contract.

The CPA has been designed to minimize visual impacts, maximize open space that fits with existing resources in the area, and provide public benefits. Four lots along SR 78/79, ranging from 21.9 to 38.1 acres, are large so that visual amenities along this third priority scenic route can be preserved. All pads for lots along SR 78/79 are a minimum of 1,100 feet from the roadway. The design would permit preservation of a large block of open space.

~~As with the Proposed Project, a five-acre lot along SR 78/79 would be provided to the Julian Cuyamaca Fire Department for their use as a fire station and training facility.~~

Most of the site, approximately 1,291.9 acres, is under a Williamson Act Contract that requires 40-acre minimum lot sizes. This alternative requires the filing of a Notice of Non-Renewal of the Williamson Act Contract over the area currently under contract, in accordance with Board of Supervisors Policy I-38. The County can agree to cancel the contract provided it can make findings that determine the cancellation is in the public interest. Those findings have been prepared as a separate document. In contrast, under the Proposed Project, the entire site would remain under Williamson Act Contract.

Total grading is 140,000 cubic yards of balanced cut and fill. Slopes do not exceed a maximum fill slope ratio of 1.5:1, or a maximum cut slope ratio of 1:1. All manufactured slopes above three feet in height would be landscaped with fire-safe plants in conformance with County ordinances. Six drainage crossings would be necessary to provide access to lots and accommodate a 100-year flood event.

The on-site circulation network would provide access to Pine Hills Road on the east, and to SR-78/79 via Daley Flats Road to Hoskings Ranch Road in the central part of the site. This road system is similar to that of the Proposed Project.

Technical, economic, and environmental characteristics are similar to those of the Proposed Project as presented in Chapter 1.0. However, a few details are modified and are discussed below. The site is zoned A72 (8), which allows one dwelling unit per eight acres. All CPA lots exceed the minimum lot size, and as such the project is not clustered.

This alternative provides open space areas totaling ~~4,216.91~~ 221.9 acres to protect a range of sensitive resources. Open space for biological purposes has been designed to provide protection for the site's most sensitive species, habitats, and important habitat linkages. The open space would also protect archaeological and visual resources. An easement would be placed over the open space that would restrict future uses to those necessary to maintain the habitat value of the area. It would be professionally managed in accord with an approved Resource Management Plan (RMP). Signage and/or fencing would be provided where necessary to deter trespassing.

Cattle grazing/breeding could continue on the 709-acre lot. In that event, the Conservation Grazing Management Plan (CGMP) provided as Appendix B to this EIR, which analyzes grazing effects for both the Proposed Project and the CPA, would govern those activities.

As with the Proposed Project, water and sewer services for the CPA would be provided by wells and septic systems and would be the responsibility of each lot owner. Extensive water-well testing and percolation testing have verified that well water is available on the property, and that septic systems are feasible. (The reader is referred to Appendix K). Fire safety design requirements are similar to those of the Proposed Project and service would still be provided by the Julian/Cuyamaca Fire Protection District.

The CPA proposes the following modifications to existing easements. Three vacation areas occur within one existing open space easement, as shown in detail on Figure 4-5-4, "Close-

up of Proposed Open Space Vacations on Consolidated Project Alternative.” These open space impacts are being mitigated at twice the usual ratio, as detailed in the biology section:

- Lot 26: Vacate an easement granted in favor of George and Janet Smith for road, utility, and incidental purposes. The easement would be vacated to allow for the main access road that traverses the easement. Portions of the easement not developed would be incorporated into the adjacent open space easement
- Lots 30, 31, and 33: (See Figure 4-5-4). Vacate portions of an easement granted for open space and incidental purposes and recorded March 27, 1986 as instrument 84-247180 of official records. A total of 2.3 acres would be vacated to allow for access roads, as well as for development area. A larger open space easement is proposed in the area that would encompass the remainder of the easement and additional areas deemed in need of protection

The CPA includes the following discretionary actions:

1. Approval of a TM that identifies the lot boundaries within the proposed project area and which shows the design and improvements of the subdivision.
2. Filing of a Notice of Non-Renewal of the Williamson Act Contract for a portion of the site.
3. Approval of Findings and related documents cancelling the Williamson Act Contract.
4. Vacation of some existing easements to provide a more effective open space design, and approval of related findings.

The CPA does not foster rapid economic or population growth, or provide infrastructure that could promote growth in surrounding areas. As a result, this alternative is not growth-inducing.

4.5.1 Analysis of CPA Significant Effects

4.5.1.1 Visual Resources

The following analysis of possible visual impacts from the CPA is based on information provided in the Visual Resources Impact Report for for the Consolidated Project Alternative Hoskings Ranch, by TRS Consultants, dated July 2013. The report was authored by Jerelyn Dilno, who is on the County of San Diego’s list of individuals approved to prepare visual studies. The report is included as Appendix S to this [DEIR/FEIR](#).

The visual impact assessment in Chapter 3.1.1 provides the baseline for this impact assessment, because the same site is being evaluated. This includes the project description, project setting, landscape units, the existing visual resources discussion, and visual quality and viewer response assessment.

Key Views

Ten key views were selected to analyze potential impacts to visual resources. Key views 1 and 2 are taken along SR 78/79, looking southeast into the site. Key view 3 is taken from SR 78/79 approaching the site from the east. Key view 4 is taken from the Pine Hills area to the southwest of the site and looks northerly into the proposed project. Key views 5 through 8 and 10 are taken heading south to north along Pine Hills Road, looking west into the proposed project. Key view 9 is the perspective from

Van Duesen Road and looks west into the site. Figure 4-5-5, "Key View Index" shows the perspective and locations of the views.

Key Views 1, 2, and 3

Key Views 1 and 2 are taken along SR 78/79 from the point of view of travelers headed east along the roadway and Key View 3 illustrates the view as travelers approach the site headed west. With the exception of orientation, the analysis of these key views, as seen by the primary viewer group, are similar. The northern border of the site is formed by approximately one mile of SR 78/79.

Key Views 1 and 2

Drivers approaching the site from the west would have a view approaching the northwest corner of the site as shown in Figure 4-5-6, "Key Views 1 and 2, SR 78/79, Plan and Profile, Looking East". The locations of Lots 2, 3, 4, and 5 are shown. The building pads of Lots 4 and 5 would be below the line of sight of the traveler. The upper five feet of a hypothetical 35-foot structure would be visible on Lot 4. The structure on Lot 5 would be screened by the structures on Lot 4. The location of the building pad for Lot 3 is screened by a small knoll. The profile views in Figure 4-5-6 demonstrate the topography and sight lines from the Highway. The views are both taken from point B₁ on Highway 78/79.

The pad for Lot 4 is designed at approximately 20 feet below grade and is approximately 0.3 of a mile from SR 78/79. The line of terrain, as shown on the profile line B₁ to B₃, from the roadway gradually slopes upward to an elevation approximately 60 feet above the roadway. From there the grade gently levels out to the pad location at a proposed grade which is approximately 30 feet below the sight line from the roadway. Any future incidental structure placed on the pad would be 35 feet or less in height. The dashed line at Lot 4 in the profile view demonstrates the low profile that is potentially in view of the observer on SR 78/79. Any future structure would be in view for approximately 30 seconds at maximum speed and would be screened by landscaping with natural vegetation in harmony with the existing plant communities. Viewer response would be minimal and visual impacts would be below a level of significance.

The pad for Lot 6 is at a proposed elevation of 4,010 feet and is approximately 30 feet below the sight line shown along profile line B₁ to B₃ in the profile view. Any incidental structure on the pad would be a maximum of 35 feet in height, leaving approximately five to seven feet in potential view of the highway. The cut and fill slopes for the pad are located on the east and west sides of the pad and are not in the line of sight. The fill slope is approximately 12 feet at its maximum and the cut slope is approximately 10 feet. Landscaping with natural vegetation that matches existing plant communities would effectively screen any future structures from view. Viewer response would be minimal and visual impacts would be below a level of significance.

The pad for Lot 3 is designed at an elevation of 3,970, requiring approximately 20 feet of cut; the profile line of B₁ to B₂ shows the pad to be approximately 40 feet below the sight line as shown on the profile view of Figure 4-5-6. Viewer response would be minimal and visual impacts would be below a level of significance.

Figure 4-5-7, "Key Views 1 and 2, Photosimulation, SR 78/79, Looking East," shows the approximate locations of Lots 3, 4 and 5. The proposed pad elevations are

slightly below the line of sight from the roadway. Viewer response would be minimal and visual impacts would be below a level of significance.

Key View 3

Drivers approaching the site from the east would encounter a predominant knoll at the intersection of Pine Hills Road and SR 78/79, which is the northeast corner of the project. Figure 4-5-8, "Key View 3, SR 78/79 Looking West," illustrates this perspective. Along this portion of SR 78/79 the roadway is bordered by natural vegetation that would remain. Any potential development of the site would not be visible from this vantage point. Viewer response to this view would be low to moderate. The existing topography and proposed project design would minimize visual impact to the viewer and it would be below a level of significance.

Key View 4

This view is representative of the perspective of the residential viewer group to the south of the project. Figure 4-5-9, "Key View 4, Looking North from Pine Hills Residential Area". The view looks northerly into the project from the nearest point of the residential viewer group in the development of Pine Hills. Homesites within the area are scattered and the closest residence is approximately one mile from the area of the site proposed for building pads. The terrain is hilly, dipping into a depression and rising to the flatter areas of the project site. The locations of Lots 16 and 17 are noted in the panoramic view from Eagle Peak Road as shown on Figure 4-5-10, "Key View 4, Photosimulation".

In the foreground of the view photograph in Figure 4-5-10, the top of an existing residence is barely visible. This homesite is approximately one-half mile from the view. All of the proposed pad locations are slightly below grade with respect to the existing topography, and they range from 0.8 tenths of a mile to just over a mile distant from the nearest point in Pine Hills as shown on the profile view in Figure 4-5-9. The profile view demonstrates that the pad proposed for Lot 16 is well below the line of sight. The pad is approximately thirty feet below the line of sight. At this distance, combined with the existing native vegetation and the pad grading design, the proposed residence would be less visible than the existing residence. Visual response of this viewer group would be minimal and no visual impacts are anticipated to this viewer group.

Key View 5

Key View 5 is a perspective of Lots 15 and 16 taken from the southeast corner of the property at the intersection of Pine Hills Road with Deer Lake Park Road. The view is to the northwest from travelers heading north on Pine Hills Road as shown in Figure 4-5-11, "Key View 5, From Southeast Corner of Project". The road reaches the top of a grade near this point and the proposed pad is located approximately 0.1 miles from the roadway. On Lot 16, the existing natural terrain would not be disturbed and any future pad and buildings would be partially obscured by the natural landscape. Additionally, the area supports natural vegetation that would screen a potential pad from view. The pad is located approximately on 3-quarter of a mile from the roadway.

The visual impact of Lot 15 to viewers from the highway would be mitigated by existing vegetation. The pad is approximately 0.2 of a mile from the roadway. Visual response of viewer groups would be minimal and no visual impacts are anticipated.

The aerial schematic inset in Figure 4-5-11 demonstrates the distance of the residence from existing residences to the east. The presence of existing vegetation and landscaping around the established homes screens their view of the location.

Key View 6

Key View 6, as shown on Figure 4-5-12, "Key View 6, Looking Northwest from Pine Hills Road", is taken from Pine Hills Road, approximately 600 feet north of the southeast corner of the property. A proposed pad on Lot 17 is approximately 0.25 miles from this viewpoint. Terrain and vegetation would screen the view of travelers. Additionally, any improvements to the lot would be screened by natural vegetation. As the traveler moves north, trees and other vegetation bordering the roadway become denser. Visual response of viewer groups would be minimal and no visual impacts are anticipated.

Key Views 7 and 8

Key Views 7 and 8 are shown on Figure 4-5-13, "Key View 7 and Key View 8, From Pine Hills Road". They represent potential views of Lot 12 from Pine Hills Road for travelers headed north (see Key View 7) or south (see Key View 8) along the western boundary of the property. As noted in other views, the vegetation bordering Pine Hills Road is very dense and would effectively screen the view of any structures on Lots 12 and 14 to drivers going north. Key View 8 indicates a break in the natural vegetation along Pine Hills Road. All cut and fill slopes would be revegetated to blend with the natural terrain.

The "Detail of Key Locations," shown on Figure 4-5-13, provides an aerial view of the pad locations relative to Pine Hills Road. The pad for Lot 12 is located approximately 600 feet from Pine Hills Road. The pad on Lot 14 is approximately 750 feet from the roadway and is effectively screened by existing vegetation along Pine Hills Road. Visual response of viewer groups would be minimal and no visual impacts are anticipated.

Key View 9

Key View 9, as shown on Figure 4-5-14, "Key View 9, Looking West from Van Duesen Road", is illustrative of the view of residents to the east of the proposed project. Heavy existing vegetation on both sides of Pine Hills Road form a visual barrier, additionally, the existing homesites to the east of the proposed project have mature landscaping that visually screens their views of the roadway.

The aerial view of the site shown in the inset, demonstrates the distance of Lots 14 and 15 from the point of view of residents to the east along Van Duesen Road. Dense vegetation effectively screens the proposed pads from this perspective. Visual response of viewer groups would be minimal and no visual impacts are anticipated.

Key View 10

Key View 10, as shown on Figure 4-5-15, "Key View 10, Looking North on Pine Hills Road," is taken from Pine Hills Road just south of the intersection with Van Duesen Road. The proposed location of Lot 14 is noted to the northeast. From this vantage point and as the viewer approaches from the south, there is a break in the heavy concentration of vegetation along Pine Hills Road. However, the proposed location of the proposed pad on Lot 17 is approximately 950 feet from the roadway and is partially screened by vegetation that follows the drainage channel. Any development

on the lot would be screened by intervening topography and natural vegetation, and typical landscaping that blends with the native vegetation in the area.

This point of view also shows the proposed intersection of re-aligned Tenya Road with Pine Hills Road. Lot 15 is located just northwest of the intersection is well screened by existing vegetation that would remain. Visual response of viewer groups would be minimal and no visual impacts are anticipated.

Fire Station Location

~~Figure 4-5-16, "Fire Station Location, Looking West along SR 78/79," provides a photosimulation of a fire station building that could be constructed on the site. The view illustrates the perspective of motorists heading west on SR 78/79. The view of the fire station would be minimal due to landscaping in conformance with the County Landscape Ordinance requiring 100 percent screening within two years. At maturity the trees would effectively screen the driveway and the building. Additionally, the building would be painted in earth tones, blending with the surrounding terrain. The view of motorists heading east on SR 78/79 would be screened by the knoll seen behind the fire station building in Figure 4-5-16. Overall, the appearance would be similar to existing low density of buildings located along the stretch of SR 78/79 from Wynola to Julian. Visual response of viewer groups would be minimal and no visual impacts are anticipated.~~

~~Figure 4-5-17, "Fire Station Location, Plan View," demonstrates the location of the building in relationship to the surrounding lots.~~

Assessment of Visual Character and Visual Quality

The change in visual character and visual quality would be minimal and no significant impacts to the visual resource would affect the identified viewer groups.

Assessment of Visual Character

The visual character of the proposed project would not significantly alter the existing view as experienced by the identified viewer groups. As demonstrate by Figures 4.5-6 through 4-5-15 of the Key Views, the four elements of visual character: dominance, scale, diversity and continuity are not significantly impacted by the proposed project. The grading of pads would be minimal and at or close to grade. No structures that would be out of scale or dominant to the view are anticipated in the final design. Continuity of the topography and community character of the surrounding area would be maintained. Where noted, lots that may potentially be seen from the roadway would be landscaped in keeping with the natural vegetation found in the area.

Assessment of Visual Quality

Visual quality is defined by the changes in vividness and/or intactness or unity. The proposed project would not substantially change the landform of the site. The grading is minimal and buildings are not planned in the proposed development. Pads are provided for the use of structures incidental to agricultural use as provided in the Williamson Act. From each of the key views examined, the change to the visual landscape does not exceed the level of significance. The ~~identified-identified~~ viewer groups would be minimally affected by the development. The visual quality of the area is not substantially impacted by the proposed project.

Assessment of Viewer Response

Viewer response to the project is low to moderate and does not rise to a level of significance. There is little change to the quality or character of the visual resource from the view-points examined. The stages of development progressing from existing conditions to construction to maturity produce little change to the existing landscape. The topography is considered in the grading design and no existing vegetation, with the exception of the pad areas, would be altered. All screening native vegetative resources would remain. Buildings would in scale with the community character of the area. Viewer response of all identified viewer groups would be minimal and no adverse impacts would be created by the proposed project.

Determination of Significance

The guidelines for determination of significance are not exceeded by the proposed project.

Guideline 1: Would the project have a substantial adverse effect on a scenic vista.

There is no substantial adverse effect on a scenic vista because views are brief, pads are located away from the roadway and potential buildings would be screened by topography and existing vegetation. In conclusion, the CPA does not have substantial adverse effect to a scenic vista and impacts are less than significant. No mitigation would be required.

Guideline 2: Would the project substantially damage scenic resources, including but not limited to trees, rock outcroppings, and historic buildings within a State scenic highway.

No scenic resources within a State scenic highway would be substantially damaged. Trees along SR78/79 in the vicinity of Pine Hills Road intersection would be trimmed to improve sight distance. These changes would be minimal and the trees would not be removed. Visual amenities along the right of way such as open fields, vegetation, and an historic cattle loading chute, are retained, preserving the visual character within and immediately adjacent to the State scenic highway. In conclusion, the CPA does not have substantial adverse effect to a State scenic highway and impacts are less than significant. No mitigation would be required.

Guideline 3: Would the project substantially degrade the existing visual character or quality of the site and its surroundings.

The project does not substantially degrade the existing visual character or quality of the site and its surrounding area because lots are a minimum of 11 acres, pads are set back from the roadway, and topography and vegetation would screen views of structures. Density is low and in keeping with the visual effects of existing large lots in the area.

In conclusion, the proposed project does not have substantial adverse effect to visual resources. No mitigation would be required.

Cumulative Impact Analysis

The cumulative boundaries selected for Hoskings Ranch are the limits of the viewshed. Figure 3-1-~~14~~12, "Cumulative Projects Map," shows the location of past, present, and reasonably anticipated projects in the area that have been determined to have a visual impact. The listed projects are: MUP 06-016 – cell tower; MUP 92-005 – cell tower; MUP 00-044 – cell tower; and TM 4489 – 41 lot subdivision. Of the

projects listed, only MUP 06-016 is within the cumulative boundary of the proposed project.

The visual impacts of the proposed project are less than significant and do not add to the cumulative effect of MUP 06-016, which have been mitigated by design. The effects of a large lot agricultural project are not cumulative with respect to that of a cell tower. In any case, the proposed project does not create any adverse effects to the visual resources. Therefore, the proposed project does not have a significant cumulative impact to visual resources on the surrounding area.

Summary of Project and Significance and Conclusions

The proposed project would not significantly alter the natural topography. The majority of the natural habitat would remain. Changes include minimal grading and the location of pads on lots ranging in size from 11.9 to 709 acres. Viewer experiences would not be disrupted because views would be limited to brief glimpses of isolated portions of structures, which would largely be screened from view. Screening would occur as the result of large setback, topography, and vegetation. ~~The proposed fire station lot would be screened in keeping with current County landscape requirements.~~ In conclusion, guidelines are not exceeded and the proposed project does not have any significant adverse effects on the visual resources of the area. No mitigation is required.

4.5.1.2 Biology

The biological setting, habitat mix, and various focused studies, described in the Proposed Project biology discussion of the DEIR/FEIR (Section 2.1.1) and the biology report (Appendix A), also apply to this alternative. This section would focus on an analysis of CPA effects discussed in the five major sections of the report: special status species, riparian habitat or sensitive natural communities, jurisdictional wetlands and waterways, wildlife movement and nursery sites, and local policies, ordinances, and adopted plans.

The CPA impacts approximately ~~499.9~~194.9 acres. An overview of impacts to habitat areas is provided in Figures 4-~~56-18A~~16A, B, and C, “Consolidated Project Alternative Biological Resources – West,” “Consolidated Project Alternative Biological Resources – Central,” and “Consolidated Project Alternative Biological Resources – East,” respectively. The CPA impacts are in contrast to those of the Proposed Project, which impacts ~~206.9~~201.9 acres.

Special Status Species

Guideline A: The project would impact one or more individuals of a special status species.

The CPA could have indirect impacts to Cuyamaca Meadowfoam, a state-listed Endangered Species. Open space preservation is required to protect this species. Indirect impacts to Swainson’s Hawk would occur through disturbance of its foraging habitat. Guideline A is exceeded and impacts are significant. Mitigation is required. **(Impact BI-1)**

Guideline B: The project would impact the regional long-term survival of a County Group A or B plant species, or a County Group I animal species, or a species listed as a state Species of Special Concern.

The CPA has direct impacts to species in these categories. However, due to avoidance, a majority of these species' habitat would be preserved on-site. These are:

- San Diego Gumplant: approximately 78 percent of the species would be preserved onsite
- Two-striped garter snake: a small habitat area is impacted, with the majority of the species habitat being preserved on-site
- Large-blotched Salamander: a small habitat area is impacted, with the majority of the species habitat being preserved on-site

The CPA has indirect impacts to species in these categories. However, due to avoidance, a majority of these species' habitat would be preserved on-site. These are:

- Velvety False Lupine: all of the onsite population is preserved, but in the absence of protective measures, the onsite population could be impacted by edge effects.
- San Diego Milk-vetch: the entire population is protected in open space, but open space protections are needed to avoid edge effects.
- Grasshopper sparrow: foraging and nesting areas are impacted but, a majority of habitat is preserved on-site.
- Golden Eagle: the majority of this species' foraging habitat is protected on-site. Nesting habitat is not present onsite.
- Red-shouldered Hawk: foraging and nesting areas are impacted, but a majority of habitat is preserved on-site.
- Turkey Vulture: foraging and nesting areas are impacted, but a majority of habitat is preserved on-site.
- Northern Harrier: habitat is impacted, but a majority of its habitat is preserved on-site.
- White-tailed Kite: foraging and nesting areas are impacted, but a majority of habitat is preserved on-site.
- Southwestern Pond Turtle: this species is not expected to occur in any of the proposed development areas. However, protective measures are needed to avoid possible edge effects. The onsite population of Southwestern Pond Turtle, in particular, is considered regionally significant. Therefore, the onsite population will be managed and monitored as part of the project's RMP.
- Cooper's Hawk: foraging and nesting areas are impacted, but a majority of habitat is preserved on-site.
- Sharp-shinned Hawk: foraging and nesting areas are impacted but a majority of habitat is preserved on-site.

Guideline B is exceeded. Impacts are significant and mitigation is required (**Impact BI-2**).

Guideline C: The project would impact the regional long-term survival of a County Group C or D plant species or a County Group II animal species.

The CPA has direct impacts to species in these categories. However, due to avoidance, a majority of these species' habitat would be preserved on-site. These are:

- Banner Dudleya: approximately five percent of the onsite population of this species would be impacted by the Project, leaving approximately 95 percent of the onsite population protected in open space.
- Engelmann Oak Woodland: approximately 34.5 acres for CPA development and 1.0 acres of open space easement vacation acres, or 14 percent of the on-site population is impacted, leaving 210.5 acres or 86 percent of the onsite population preserved in open space.
- San Diego Desert Woodrat, Silvery Legless Lizard, Orange-throated Whiptail, San Diego Ringneck Snake, Coronado Skink, San Diego Horned Lizard, Coastal Western Whiptail, Coastal Rosy Boa, San Diego Mountain Kingsnake, and Northern Red Diamond Rattlesnake: habitat supporting these species is impacted, along with a small number of the species' populations. However, a majority of the species and their habitats are protected on-site.

The CPA has indirect impacts to species in these categories:

- Great Blue Heron, Green Heron, Mountain Lion, Mule Deer, Monarch Butterfly: the CPA would indirectly impact these species' habitat. However, the majority of these species' habitat is protected on-site.
- California Horned Lark, Western Bluebird, Barn Owl: the project would indirectly impact foraging and nesting habitat of these species. However the majority of these species' habitat is preserved on-site.

Guideline C is exceeded and impacts are significant. Mitigation is required (**Impact BI-3**).

Guideline D: The project may impact Arroyo Toad aestivation or breeding habitat.

Arroyo Toad aestivation or breeding habitat is not found on the site. Impacts are not significant and no mitigation is proposed.

Guideline E: The project would impact Golden Eagle habitat.

The CPA could directly and indirectly impact Golden Eagle foraging habitats through the development of 499.9194.9 acres. Nesting habitat is not present onsite. This wide-ranging species is known to forage onsite and nest in the Cleveland National Forest, which adjoins the site. Golden Eagle is declining in San Diego County and is highly sensitive to human activity. Guideline E is exceeded and Impacts are significant. Mitigation is required. (**Impact BI-4**)

Guideline F: The project would result in a loss of functional foraging habitat for raptors.

The CPA would preserve approximately 4,246.91,221.9 acres of potential raptor foraging habitat, which would allow the onsite raptor species to continue to forage on-site. However, the CPA could result in the loss of up to 499.9194.9 acres of potential foraging habitat for the site's resident and potentially resident species. This loss could potentially result in significant impacts to raptor foraging. Impacts are significant and mitigation is required. (**Impact BI-5**)

Guideline G: The project would increase noise and/or nighttime lighting to a level above ambient proven to adversely affect sensitive species.

The CPA would not increase noise and/or nighttime lighting to a level that has been proven to adversely affect sensitive species due to the low residential density proposed. Impacts are not significant and no mitigation is proposed.

Guideline H: The project would impact the viability of a core wildlife area, defined as a large block of habitat (typically 500 acres or more not limited to project boundaries, though smaller areas with particularly valuable resources may also be considered a core wildlife area) that supports a viable population of a sensitive wildlife species or an area that supports multiple wildlife species.

The Proposed Project Site constitutes a core wildlife area according to the County's definition due to its size and the number of sensitive wildlife species that occur onsite. The CPA has been designed to avoid impacts to 86 percent of this core wildlife area by preserving large blocks of generally contiguous habitat that encompasses many of the most biologically significant areas in [4,216.91,221.9](#) acres of managed biological open space easements. County guideline 3.1.A states that "alteration of any portion of a core habitat could only be considered less than significant if a biologically-based determination can be made that the project would not have a substantially adverse effect on the core area and the species it supports". Because the CPA preserves 86 percent of the Hoskings Ranch core wildlife area, County policy as defined in the Guidelines for Determining Significance, Biological Resources indicates that impacts are less than significant. Guideline H is not exceeded, impacts are less than significant, and no mitigation is required.

Guideline I: The project would increase human access or predation or competition from domestic animals, pests or exotic species to levels that would adversely affect sensitive species.

The CPA would increase human presence on the site and could lead to intrusions by residents or pets into sensitive open space areas. Open space protections are required. With adequate protection of the proposed open space area, impacts are reduced to below a level of significance. **(Impact BI-6)**

Guideline J: The project would impact nesting success of sensitive animals (as listed in the Guidelines for Determining Significance) through grading, clearing, modification, and/or noise generating activities such as construction.

The CPA could impact the nesting success of sensitive animals through future grading, clearing, construction, and/or noise generating activities. Mitigation is required to limit these effects during the nesting season of sensitive species. **(Impact BI-7)**

Riparian Habitat or Sensitive Natural Communities

Guideline A: Project-related construction, grading, clearing, construction or other activities would temporarily or permanently remove sensitive native or naturalized habitat on or off the project site.

The CPA related activities would permanently remove sensitive native or naturalized habitat on the project site and off-site. The CPA would directly impact the following (in acres):

- 2.0 Southern Mixed Chaparral
- 1.0 Diegan Coastal Sage Scrub
- 18.1 Flat-top Buckwheat
- 6.3 Coast Live Oak Woodland
- 35.5 Engelmann Oak
- 14.1 Mixed Oak Woodland
- 1.8 Mixed Oak/Coniferous/Bigcone/Coulter
- 103.9 Non-native grassland
- 17.0 Montane Meadow
- 0.25 Riparian Scrub

The CPA project preserves a total of ~~4,216.91~~221.9 acres of these habitats in open space. Details are provided in Table 4-2-1, “Biological Impact Table – Consolidated Project Alternative”. The open space design as proposed would reduce these impacts to less than significant and no further mitigation would be required. (**Impact BI-9**)

Guideline B: Any of the following would occur to or within jurisdictional wetlands and/or riparian habitats as defined by ACOE, CDFG and the County of San Diego: removal of vegetation; grading; obstruction or diversion of water flow; adverse change in velocity, siltation, volume of flow, or runoff rate; placement of fill; placement of structures; construction of a road crossing; placement of culverts or other underground piping; any disturbance of the substratum; and/or any activity that may cause an adverse change in native species composition, diversity and abundance.

Impacts to wetlands and/or riparian habitats would occur as a result of the CPA. This would include limited removal of vegetation, grading, obstruction or diversion of water flow, or placement of fill, structures, road crossings, culverts or piping. Disturbance of the substratum may occur, and/or activities that may cause a measurable adverse change in native species composition, diversity, and abundance. Wetter areas of the Non-native Grassland and Montane Meadow, and the Riparian Scrub that would be impacted by the CPA qualify as jurisdictional wetlands and/or riparian habitats. Most of the site’s jurisdictional wetlands and/or riparian habitats would be protected in open space, but some relatively minor impacts (0.25 acres) to these habitats are unavoidable. Guideline B is exceeded. Impacts are significant and mitigation is required. See the Jurisdictional Wetland discussion below for additional details. (**Impact BI-9**)

Guideline C: The project would draw down the groundwater table to the detriment of groundwater-dependent habitat, typically a drop of 3 feet or more from historical low groundwater levels.

Groundwater-dependent plant species onsite are limited to large, deep-rooted California Sycamores, Western Cottonwoods, and possibly very large willows. These are associated with drainages, primarily, so it is likely that they are not actually using groundwater, but have the potential to do so in extreme conditions. The Proposed Project would not draw down the groundwater table to the detriment of groundwater-dependent habitat; hydrological tests have demonstrated adequate recovery rates in

local wells. Guideline C is not exceeded and impacts are not significant. No mitigation is required.

Guideline D: The project would increase human access or competition from domestic animals, pests or exotic species to levels proven to adversely affect sensitive habitats.

The CPA would increase human presence on the site and could lead to intrusions by residents or pets into sensitive open space areas. Open space protections are required. With adequate protection of the proposed open space area, impacts are reduced to below a level of significance. Guideline D is exceeded, impacts are significant, and mitigation is required. **(Impact BI-10)**

Guideline E: The project does not include a wetland buffer adequate to protect the functions and values of existing wetlands.

The CPA includes wetland buffers that are adequate to protect the functions and values of existing wetlands. Impacts are not significant and no mitigation is required.

Federal Jurisdictional Wetlands and Waterways

Guideline A: Any of the following would occur to or within federal jurisdictional wetlands and/or waters as defined by ACOE: removal of vegetation; grading; obstruction or diversion of water flow; adverse change in velocity, siltation, volume of flow, or runoff rate; placement of fill; placement of structures; construction of road crossings; placement of culverts or other underground piping; any disturbance of the substratum; and/or any activity that may cause an adverse change in native species composition, diversity and abundance.

CPA-related future construction, grading, clearing, or other activities would result in impacts to Federal Jurisdictional Wetlands and Waterways as defined by ACOE, including a direct impact on 0.14 acres of federal jurisdictional wetlands and/or riparian habitats. Guideline A is exceeded. Impacts are significant and mitigation is required. **(Impact BI-11)**

Guideline B: The project would draw down the groundwater table to the detriment of groundwater-dependent habitat, typically a drop of 3 feet or more from historical low groundwater levels.

The CPA would not draw down the water table to the detriment of the groundwater-dependent habitat. Groundwater testing has indicated there are adequate groundwater resources in the area to support the CPA without drawing down water to 3 feet or more. Guideline B is not exceeded. Impacts are not significant and no mitigation is proposed.

Guideline C: The project does not include a wetland buffer adequate to protect the functions and values of existing wetlands.

The CPA includes wetland buffers that are adequate to protect the functions and values of existing wetlands. Wetland buffers extend a minimum of 50 feet and up to 200 feet from the outer edge of all RPO wetlands wherever feasible. No buffer is less than 50 feet and the encroachments that do occur are in areas where buffers have been extended to 200 feet due to the presence of oaks, as required by County guidelines for biology. The encroachments are limited to approximately 50 feet in three isolated areas: at lots 10, 14, 15, and 18, due to the main access road; and lot 16 due to the driveway. The encroachments do not affect the functions and value of existing wetlands because a minimum of 150 feet buffer is preserved in all cases.

Additionally, RPO wetlands and buffers would be protected from future fire clearing through dedication of a minimum 100-foot Limited Building Zone (LBZ). Impacts are not significant and no mitigation is required.

Wildlife Movement and Nursery Sites

Guideline A: The project would prevent wildlife access to foraging habitat, breeding habitat, water sources, or other areas necessary for their reproduction.

The CPA would not prevent wildlife access to foraging habitat, breeding habitat, water sources, or other areas necessary for their reproduction because most areas on-site that are used by wildlife would be protected in open space easements. The areas that are most valuable for wildlife are protected, including at least 99 percent of riparian areas, local wildlife corridors, and drainages. The corridor along Orinoco/Temescal Canyon Creek is also protected. Buffers are also provided along most drainages. The project design addresses the access, and other breeding issues. Guideline A is not exceeded. Impacts are not significant and no mitigation is proposed.

Guideline B: The project would substantially interfere with connectivity between blocks of habitat, or would potentially block or substantially interfere with a local or regional wildlife corridor or linkage.

The CPA has been designed to avoid interference with habitat connectivity and wildlife corridors and ensure the ongoing integrity of the open space. The CPA preserves blocks of habitat along the western and northern property boundaries, which maintains the connectivity between the onsite habitats and undeveloped, high value habitats offsite to the west and northwest. Narrow peninsulas of habitat have been avoided and a minimum of 400 feet of separation has been maintained between development areas. Grazing would not be allowed in or near Orinoco/Temescal Canyon Creek, a regional wildlife movement corridor in the area. Impacts to wildlife corridors have been avoided. Guideline B is not exceeded and impacts are less than significant. No mitigation is required.

Guideline C: The project would create artificial wildlife corridors that do not follow natural movement patterns.

The CPA is a consolidated project that removes development from large blocks of habitat which contain many of the site's natural wildlife movement areas such as Orinoco/Temescal Canyon Creek. Artificial corridors that do not follow wildlife movement patterns are avoided. Guideline C is not exceeded and impacts are not significant. No mitigation is proposed.

Guideline D: The project would increase noise and/or nighttime lighting in a wildlife corridor or linkage to levels proven to affect the behavior of the animals identified in a site specific analysis of wildlife movement.

The CPA does not increase noise or lighting in a way that would interfere with wildlife movement. Overall site density is low. At least 88 percent of the site's wildlife corridors and linkages would be preserved in open space. The smallest lot is 11.9 acres, and the average lot size is slightly greater than 40 acres. Guideline D is not exceeded. Impacts are not significant and no mitigation is proposed.

Guideline E: The project does not maintain an adequate width for an existing wildlife corridor or linkage and/or would further constrain an already narrow corridor through activities such as (but not limited to) reduction of corridor width, removal of available

vegetative cover, placement of incompatible uses adjacent to it, and placement of barriers in the movement path.

The CPA consolidated development in the eastern and north-central part of the site, thereby preserving a large habitat block in the south. Approximately 709.3 acres are preserved in this area. Adequate widths are maintained, in particular the regional wildlife corridor associated with Orinoco/Temescal Canyon Creek. Guideline E is not exceeded. Impacts are not significant and no mitigation is proposed.

Guideline F: The project does not maintain adequate visual continuity (i.e., long lines-of-site) within wildlife corridors or linkage.

Adequate visual continuity is preserved because the majority of the site's wildlife corridors and linkages are preserved in dedicated open space. The open space would be protected from activities that could inhibit visual continuity, such as structures. Guideline F is not exceeded. Impacts are not significant and no mitigation is proposed.

Local Policies, Ordinances, and Adopted Plans

Guideline A: For lands outside of the MSCP, the project would impact coastal sage scrub (CSS) vegetation in excess of the County's 5% habitat loss threshold as defined by the Southern California Coastal Sage Scrub Natural Communities Conservation Planning Process (NCCP) Guidelines.

The CPA is located outside of the MSCP and would impact 19.1 acres of CSS. This would not exceed the County's authorized five percent loss of 2,953.3 acres for this portion of the County. It is the County's policy that any "take" of CSS less than the authorized 2,953.3 acres (five percent loss), is a less than significant impact. Based on this policy, the CPA's impacts to CSS as they relate to Local Policies, Ordinances, and Adopted Plans are therefore less than significant. Guideline A is not exceeded, impacts are less than significant, and no mitigation is required.

Guideline B: The project would preclude or prevent the preparation of the subregional Natural Communities Conservation Planning Process (NCCP). For example, the project proposes development within areas that have been identified by the County or resource agencies as critical to future habitat preserves.

The project is located in a conservation area of the draft East County Subarea MSCP Plan, meaning that the site is important to future regional preserve design. The project could preclude future preserve design. Although impacts would occur, these are less than significant. Guideline B is not exceeded, impacts are less than significant and no mitigation is required.

Guideline C: The project would impact any amount of sensitive habitat lands as outlined in the Resource Protection Ordinance (RPO).

Please refer to Figure 4-56-1917, "Consolidated Project Alternative – RPO Encroachments", which shows the CPA's RPO impacts.

Point 1: This is the location of the main project entry road at Lots 14 and 15. An RPO wetland is impacted by the crossing. Impacts amount to approximately 0.06 acres. Previously the entry was farther north and crossed two channels. Impacts have been minimized by moving the entry to a point where the wetland converges into a single channel. The current design represents the environmentally superior option because it is consistent with the County's requirements for RPO crossings:

(aa) There is no feasible alternative. As described, all options have been weighed, and several previous more impactful design were eliminated in favor of the current, less impactful alignment.

(bb) The crossing is limited to the least number feasible. The current design reduces the impact to a single crossing which provides the main entrance to the project.

(cc) The crossing proposed is located and designed in such a way as to cause the least impact to environmental resources because it has been placed at a point where the RPO wetland narrows and where grading can be minimized.

(dd) For all of the crossings, the least-damaging construction methods would be utilized, as guaranteed through the Resource Management Plan (RMP) that would govern the management of the site's resources during construction and onward in perpetuity. The RMP would ensure that staging would not take place within sensitive areas, that work during the nesting or breeding seasons would not occur, and that noise attenuation measures would be implemented when necessary to avoid disturbance to resources.

(ee) For crossings 1, 3, and 4, the applicant has analyzed the possibilities for the crossing to serve adjoining properties. Properties east of the site could utilize the crossing as an escape route in the event of an emergency. Properties offsite to the northwest of the project boundary also would be able to utilize the crossing in the event of an emergency.

(ff) For all of the crossings, impacts would be mitigated at the acceptable ratio of 3:1 with a minimum of 1:1 creation.

Point 2: This is the driveway entry to Los 15 and 16. Part of a 200 foot RPO wetland buffer is impacted by the crossing. It is not feasible to avoid the impact because other sensitive resources would be impacted if the driveway were moved north. One crossing is the minimum number feasible for this lot. The crossing was designed to minimize impact by using the minimum width allowed by fire officials: 24 feet of pavement on a 28 foot graded surface. The minimum remaining buffer width is 100 feet, which extends for approximately 60 feet before widening back to 200 feet. While the crossing is not currently proposed to serve adjoining properties, the design does not preclude future access by adjoining properties. Therefore, the design meets all of the criteria for RPO crossings.

Point 3: The main project entry road impacts the 50 foot wetland buffer associated with an RPO wetland north of the road at Lot 10. No wetland is directly impacted. A detention basin previously proposed in the wetland and wetland buffer has been moved, eliminating direct wetland impacts. The convergence of several resources in the area creates a design challenge. To the south, a Coast Live Oak buffer would be impacted by any relocation of the road to the southward. Also in the area to the south, steep slopes related to a gully create a design challenge; therefore, it is not feasible to avoid RPO buffer. Crossings are limited to the minimum number feasible because this is the one main road through the project. The current project design represents the least impactful ~~live~~ solution for the crossing. Therefore, the design meets all of the criteria for RPO crossings.

Point 4: This is where the main entry road impacts approximately 0.03 acres of wetland that is located south of the road at Lots 7, 17, and 18. The road alignment has been designed to minimize the impact, but some impacts are nonetheless

unavoidable due to the presence of a steep hillside covered in rock-outcroppings in this area which also contain other sensitive resources that should be avoided. Any redesign further to the north would require blasting into the hillside, and may impact other sensitive resources. Therefore, the design of the road in this location has been optimized to avoid impacts. Crossings are limited to the minimum number feasible because this is the one main road through the project. Therefore, this crossing meets all of the criteria for RPO crossings.

The CPA would impact a measurable amount of sensitive habitat lands as outlined in the RPO. Project impacts to sensitive habitats are outlined on Table 4-2-1. Guideline C is exceeded. Impacts are significant and mitigation is required. **(Impact BI-12)**

Guideline D: The project would not minimize and/or mitigate coastal sage scrub habitat loss in accordance with Section 4.3 of the Natural Communities Conservation Planning Process (NCCP) Guidelines.

The Proposed Project has been designed to minimize impacts to CSS and would mitigate all impacts to CSS via dedication of land and implementation of land management. Guideline D is not exceeded. Impacts are not significant, and no mitigation is proposed.

Guideline E: The project does not conform to the goals and requirements as outlined in any applicable Habitat Conservation Plan (HCP), Habitat Management Plan (HMP), Special Area Management Plan (SAMP), Watershed Plan, or similar regional planning effort.

The project is not located in planning areas of these types. Guideline E is not exceeded. Impacts are not significant and no mitigation is proposed.

Guideline F: The project would preclude connectivity between areas of high habitat values, as defined by the Southern California Coastal Sage Scrub Natural Communities Conservation Planning Process (NCCP) Guidelines.

The CPA would not preclude connectivity between areas of high habitat values, as defined by the NCCP Guidelines. This is because the limited amount of CSS on the subject site does not qualify as "high (CSS) habitat value". While the site contains many areas of high and very high-value habitat, the CSS in particular is successional, patchy, and of lower conservation value. Due to its successional nature, the onsite CSS vegetation exhibits limited offsite habitat connectivity. Guideline F is not exceeded. Impacts are not significant, and no mitigation is required.

Guideline G: The project would reduce the likelihood of survival and recovery of listed species in the wild.

The alternative would have no effect on the likelihood of survival and recovery of listed species in the wild because it preserves substantial areas of all habitats that occur on the site in large blocks of habitat are that would facilitate species survival and/or recovery. Guideline G is not exceeded. Impacts are not significant and no mitigation is proposed.

Guideline H: The project would result in the killing of migratory birds or destruction of active migratory bird nests and/or eggs (Migratory Bird Treaty Act).

The CPA could result in the killing of migratory birds or destruction of nests unless open space protections and seasonal restrictions are adopted. Guideline H is exceeded. Impacts are significant and mitigation is required. **(Impact BI-13)**

Guideline I: The project would result in the take of eagles, eagle eggs or any part of an eagle (Bald and Golden Eagle Protection Act).

The site does support Golden Eagles and the CPA would result in the loss of some foraging habitat for this species. Additionally, CPA activities could modify eagle behavior, resulting in “take” as it is defined by the Wildlife Agencies. Guideline I is exceeded. Guideline I is exceeded. Impacts are significant and mitigation is required. **(Impact BI-14)**

Cumulative Impacts

The same study area that was selected for TM5312 applies to the CPA. Details of the cumulative study area, cumulative projects and their impacts are provided in Section 2.1.3.

The CPA’s cumulative impacts to special status species are not significant because the impact areas are limited in scale and the projects would not significantly impact large numbers of species in this category. The CPA has limited impacts to two species. However, mitigation that reduced impacts to below a level of significance would ensure that approval of the CPA would not have a cumulatively considerable impact when viewed in the context of past, present, and probably future projects.

The CPA contributes to the cumulative loss of riparian habitats or sensitive natural communities. The CPA and all cumulative projects avoid impacts or fully mitigate impacts. Alterations of ACOE or CDFG defined wetlands are also subject to permitting by these agencies, which serves to discourage and reduce impacts. Impacts are not significant because all cumulative projects with impacts mitigate with on-site open space easements which preserve these habitats.

Jurisdictional wetlands and waterways are impacted by two projects and the CPA. Impacts are limited in scope. All projects use avoidance as a principal strategy in limiting impacts. Where impacts occur, mitigation is required. Permitting and review by ACOE, CDFG, and the County of San Diego further limit impacts. Due to the extent of the wetland habitats on-site, the mitigation that would be implemented, and the limited extent of impacts, approval of the CPA, in conjunction with other projects in the area, would not have a cumulatively considerable impact.

Projects within the cumulative study area could impact wildlife movement corridors or nursery sites. These impacts are either minimal, or have been mitigated to a level that is less than significant. As with the CPA, impacts do not inhibit the overall integrity of wildlife movement corridors. Cumulative impacts to wildlife movements are not significant and no mitigation is required.

Cumulative impacts to local policies, ordinances, and plans are not significant. Other projects in the study area would conform to local policies and ordinances as they are reviewed by the County of San Diego. Several of these projects already have Mitigated Negative Declarations. The CPA fully mitigates its impacts and would obtain necessary permits from all agencies with jurisdiction over the site. Impacts are not cumulatively considerable and are not significant. Overall cumulative impacts are not significant and no mitigation is required.

Summary of Impacts

BI-1

The CPA impacts species listed as federally or endangered, specifically Cuyamaca Meadowfoam (direct impact) and Swainson’s Hawk (indirect impact).

BI-2, BI-3

Construction-related activities would directly and indirectly impact a range of species on the County Group A, B, C, or D lists.

BI-4, BI-5, BI-15

The CPA could directly or indirectly impact Golden Eagles or raptor foraging habitat.

BI-6, BI-10

The increased human presence on the site could lead to direct and indirect impacts.

BI-7

The CPA could impact nesting success of sensitive animals.

BI-8, BI-9, BI-11

The CPA would directly impact riparian habitat, sensitive native or naturalized habitat, or Federal Jurisdictional Wetlands and Waterways under ACOE or CDFG jurisdiction. *BI-12*

RPO defined sensitive habitats could be impacted by the alternative.

BI -13

The CPA would result in the killing of migratory birds or the loss of some of their habitat.

BI-14

The CPA project would result in the loss of some Golden Eagle foraging habitat.

Mitigation

The following mitigation would be required.

M-BI-1

The CPA's ~~4,216.91,221.9~~-acre Open Space Easement would preclude future development or other use of the land within that area and provides the mitigation required for all biological impacts onsite.

The CPA's open space contains "impact neutral" areas which are part of required RPO wetland buffers and are not available for use as mitigation for Proposed Project impacts. All feasible measures necessary to protect and preserve the RPO sensitive habitat lands shall be required as a condition of permit approval. The mitigation provides an equal or greater benefit to the affected species, per RPO section 86.604 (f).

M-BI-2

A Resource Management Plan (RMP) to address adequate mitigation for CPA impacts shall be prepared, approved, and implemented as a condition of project approval. The RMP would contain guidelines for the stewardship, maintenance, biological monitoring, and overall funding and management of the onsite open space. The RMP would eliminate future unauthorized intrusion into biologically sensitive areas through several methods, including fencing, signage, and restrictions to recreational use of the open space.

The RMP contains provisions to ensure long-term viability of the habitat for County Group I and II animals, Group A, B, C, and D Plants, and potentially other sensitive animals. The plan would specify remediation as necessary, in perpetuity, to maintain habitat viability.

The project also includes either offsite mitigation for project impacts to Riparian Habitats or Other Sensitive Natural Communities in approved wetland mitigation bank in the area that the agencies accept, or the preparation and implementation of an approved WRP (provided as Attachment E to the biology report). The WRP would guide the revegetation of degraded and disturbed areas of the site with native wetland vegetation in order to mitigate for CPA impacts to jurisdictional wetland and "waters". The WRP identifies standards, methodologies, and protocols that have demonstrated success in past wetland revegetation projects.

M-BI-3

The protections provided by the RMP over the CPA's open space areas would provide protections for raptors (including Golden Eagle, specifically), migratory birds, and other sensitive bird species' and their habitats as well. In order to prevent potential impacts to the nesting success of sensitive animals, site brushing, grading, and/or the removal of native vegetation within 500 feet of any potential nesting location shall not take place during the native bird season, defined as from 1 January to 31 August each year. This is required in order to ensure compliance with the federal Migratory Bird Treaty Act and Sections 3505, 3505.5, and 3513 of the California Fish and Game Code, which prevent the 'take' of eggs, nests, feathers, or other parts of most native bird species. Should it be necessary to conduct brushing, grading, or other construction activities during the bird breeding season, a preconstruction nesting survey of all areas within 500 feet of the proposed activity would be required. The results of the survey would be provided in a report to the Director, Department of Planning and Development Services and the Wildlife agencies for concurrence with the conclusions and recommendations.

M-BI-4

The CPA also includes the preparation and implementation of a Wetland Revegetation Plan (WRP) (attached to the biological analysis). The purpose of the WRP shall be to guide the revegetation of degraded and disturbed areas of the site with native wetland vegetation in order to mitigate for CPA impacts to jurisdictional wetlands and 'waters'. The WRP shall identify standards, methodologies, and protocols that have demonstrated success in past wetland revegetation projects. A concerted effort to create suitable planting densities, species composition, and other related factors shall be considered during the design of the WRP.

M-BI-5

The Conservation Grazing Management Plan (CGMP) contains site-specific conservation measures and practices that address multiple resource concerns on areas where grazing related activities or practices would be planned and applied. This includes a discussion of climate, water resources, geology, special physical features, soils, erosion, hydrology, surface water drainage, and water quality along with grazing capacity, infrastructure, special management areas and hazards, ecosystem health, special habitats and feature characteristics, The CGMP identifies predicted effects and desired conditions, including the consequences of grazing and related management of special resources, non-grazing (but related) management of

special resources, alternative feasible management scenarios, and timeline of management requirements of special resources affected by grazing. The CGMP discusses sustainability, including integration with the regional socio-economic systems for long-term viability, and guidelines, incentives, and contingencies for all operations. Finally, the CGMP defines the monitoring of site conditions and the planned effects on resources related to grazing, including monitoring variables, methods, a schedule, evaluation standards and analysis, adaptation of management actions, and reporting.

M-BI-6

Because the CPA would impact federal jurisdictional wetlands, it would likely be necessary to obtain certain regulatory agency permits prior to project development. The applicant is required to consult with ACOE regarding Clean Water Act Section 404 permits. As part of this process, the ACOE would likely require that jurisdictional wetland delineation be conducted and that a jurisdictional wetland delineation report be prepared in order to quantify all CPA impacts to jurisdictional wetlands.

M-BI-7

The County's RPO requires that impacts to RPO wetlands be avoided except under certain extenuating circumstances (See RPO Section 86.604(a)(5) findings in Section 4.5 of this ~~DEIR~~ FEIR). The County also requires buffers of at least 50-feet to protect all RPO wetlands. The County considers RPO wetlands and the habitat within RPO wetland buffers to be "impact neutral" and therefore unavailable for use as mitigation for project impacts. Furthermore, where oak woodland occurs adjacent to an RPO wetland, the County requires that the wetland buffer be extended outward to include the entirety of the oak habitat (not to exceed 200 feet in width). Where feasible, the CPA complies with these requirements.

The CPA's unavoidable impacts to RPO wetlands would be mitigated for at a 3-to-1 ratio, with at least 1-to-1 of this ratio consisting of wetlands creation, and the balance (a 2-to-1 ratio) consisting of wetlands creation and/or enhancement. This could occur at an off-site County-approved mitigation bank, if available, and/or onsite via habitat creation, restoration, and/or enhancement within the open space. Any onsite wetlands creation, restoration, and/or enhancement activities would be subject to the County approval of a WRP. An RMP would also be prepared and approved as a condition of CPA approval. The RMP would contain guidelines for the stewardship, maintenance, biological monitoring, and overall funding and management of the open space, including all areas of conserved RPO wetlands.

M-BI-8

The CPA would be required to obtain a HLP from the County of San Diego. The permit would mitigate agency concerns by providing appropriate mitigation for all CPA-related impacts to Diegan Coastal Sage Scrub and related Scrub habitats. The site supports approximately 150.3 acres of Scrub habitat (Diegan Coastal Sage Scrub, Inland Form, Flat-top Buckwheat, and Coastal Sage – Chaparral Scrub), 19.1 acres of which would be impacted by proposed CPA development.

Comparison of the CPA and the Project

The CPA has similar biological impacts when compared to the proposed project, as shown in the following table (all quantities are in acres):

**Table 4-2-2
COMPARISON OF THE CPA AND THE PROJECT**

	CPA	Project
Development Area	499.9 194.9	206.9 201.9
Off-site Impacts	0	0
Open Space	1,216.9 1,221.9	1,209.8 1,214.8
Impact Neutral Open Space	274.3	281.9

Summary

An assessment of the biological impact of the CPA indicates the project would impact ~~499.9~~194.9 acres of habitat directly, and would also have indirect impacts associated with construction and an increased human presence on the site. A range of mitigation measures would be required which focus on creating a protected and managed open space area. Approximately ~~1,216.9~~1,221.9 acres would be set aside onsite to protect habitat for a range of species, including Golden Eagle. Wetland creation and restoration at an overall 3-to-1 ratio is called for to mitigate impacts to this sensitive habitat. The CPA has similar impacts to biology when compared to the proposed project. The CPA’s proposed mitigation reduces all impacts to below a level of significance. No further mitigation is necessary.

4.5.1.3 Cultural Resources

The cultural resources setting and existing conditions information provided for the Proposed Project in Section 2.2 applies to the CPA. Forty-five historical and archaeological sites have been found on the property. Table 1 of the cultural resources report summary for the CPA (Appendix B1 to the cultural resources report) details these sites. Guidelines of Significance are the same as those used for the Proposed Project. They are reiterated at the outset of each analysis section below.

Historical and Archaeological Resources

Any of the following would normally be considered a potentially significant environmental impact to historic or archaeological resources:

1. The project, as designed, causes a substantial adverse change in the significance of a historical resource as defined in Section 15064.5 of the State CEQA Guidelines.
2. The project proposes activities or uses damaging to, and fails to preserve, significant cultural resources as defined by the Resource Protection Ordinance.

Of the 45 sites on the property, seven sites have been assessed as not significant; two are isolates (CA-SDI-7110 and P-37-025435), two are historic period sites (CA-SDI-16,852H and CA-SDI-16,871H), and three are bedrock milling sites (CA-SDI-16,865, CA-SDI-16,873, and CA-SDI-17,057). The isolates are not significant resources by definition. No artifacts were observed at CA-SDI-16,852H and CA-SDI-16,871H, and the research potential of the resources is quite limited. Impacts to

these two sites have been reduced to below a level of significance through recording and documentation of these resources in the de Barros (2004) report, and no mitigation measures would be required for them. A testing program was conducted at the three prehistoric sites, which were shown to have a limited research potential (de Barros 2004). Potential impacts to CA-SDI-16,865, CA-SDI-16,873, and CA-SDI-17,057 have been mitigated to below a level of significance through testing, recording, and documentation. Of all seven, only CA-SDI-16,865 is not located in open space. Historic features of CA-SDI-16,863/H, consisting of several cattle troughs, are part of the ranching features that are proposed as a noncontiguous historic district, which would make them significant resources.

Three sites were assessed as significant resources as part of the 2003 study. CA-SDI-7102 is a large habitation site with numerous bedrock milling features and a range of artifact types. CA-SDI-7109 is also a large habitation site with numerous bedrock milling features and cupules, as well as flaked stone and ground stone artifacts and pottery. Both of these sites appear to have significant research potential, as well as possible cultural significance to the Native American community. They are assumed to be significant resources in the absence of formal testing. P-37-025402 is the Starr Corral. Although the corral only dates to the 1960s, it is a unique resource due to its unusual construction; it is made of old railroad boxcars. Two other such corrals had been known in the county, but both of them were destroyed in the 2003 Cedar Fire. The Starr Corral is part of the historic ranching district.

The remainder of the archaeological sites within the Proposed Project area have not been evaluated for significance. Because these sites have not been evaluated, they must be assumed to be RPO significant resources.

One resource potentially would be subject to direct impacts from implementation of the 35-Lot Consolidated Alternative: CA-SDI-16,865, in CPA Lot 17, has been sufficiently recorded, documented, and tested to reduce the impacts to a level below significant.

Of the 43 resources in dedicated open space under the 35-Lot Consolidated alternative, two are isolates (CA-SDI-7110 and P-37-025435) and thus are not significant resources. Four of the sites in open space (CA-SDI-16,852H, CA-SDI-16,871, CA-SDI-16,873, and CA-SDI-17,057) have been evaluated as not significant. Potential impacts to these four sites have been reduced to below a level of significance through testing, recording, and documentation. The remaining 37 resources in open space easements are assumed significant in the absence of testing. If CPA plans change such that any of these 37 resources are no longer within open space easements, the affected sites must be assessed to determine the significance of potential impacts, and appropriate mitigation measures must be developed and implemented. Impacts are not significant and no mitigation is proposed. Grading or brushing activities could impact untested resources in designated open space areas. This potential impact requires a monitoring program **(Impact CR-1)**.

Although the Proposed Project is not directly responsible for the eroding condition of CA-SDI-16,881/H, mitigation for this impact would be a condition of project approval. A data-recovery excavation would be conducted to collect a sample of cultural material. This material would be cataloged and analyzed, and a report would be prepared to detail the methods and results of the data-recovery program. **(Impact CR-2)**

Cumulative Impacts

The cumulative impact study area is the same and the one used for the Proposed Project. The reader is referred to Section 2.2.3 for details. The list of past, present, and anticipated future projects is also the same. Of the 90 projects reviewed, five, including the CPA, have potential to impact cultural resources. MUP 72-460-72, a Girls Scout Camp, had impacts to archaeology that were mitigated with open space preservation. SP 03-015, the Leroux residence in downtown Julian, was studied but did not have significant impacts. MUP 97-005, Red Horse Winery, had the potential to impact archaeology, but a Negative Declaration was issued. The CPA itself has the potential to impact one resource. Mitigation is proposed to reduce this impact to below significance.

Cultural impacts have been avoided to the greatest extent possible in the region, evidenced by the small number of past, present, or anticipated projects in the 90 project study list that have cultural impacts. Where impacts have occurred, effects have been fully mitigated. Three of the five projects were determined to have no significant impacts to cultural resources. Given the small number of projects with impacts and the use of avoidance and mitigation to address them, cumulative impacts are not significant and no mitigation is required.

Summary of Impacts

CR-1

Grading or brushing activities could impact untested resources in designated open space areas.

CR-2

CA-SDI-16,881/H is eroding due to natural processes and should be recovered.

Mitigation

M-CR-1

A monitoring program would be implemented for any grading or other ground-disturbing activity. The monitoring program would be required not only for ground-disturbing activities as part of the Tentative Map, but also any development that occurs subsequent to approval of the TM. The monitoring and data recovery program must be provided to the satisfaction of the Director of Planning and Development Services, and must include monitoring by a County-approved archaeologist and a Native American monitor. Appendix B provides details about the requirements of the monitoring program which address data discovery, recovery, and documentation; notes to the Grading Plan; and necessary sign-offs and documentation proving adherence to the program. [The archaeological consultant, County staff, and Native American representatives will work together to determine the disposition of any Native American cultural material collected, determining if some material would be repatriated rather than curated, taking into account the definitions under NAGPRA. Historic era cultural material collected would be curated.](#)

Additionally, a temporary fencing and signage plan would be implemented along the perimeter of the open space during periods of construction activity to ensure that workers and equipment do not inadvertently encroach into the open space and onto any of the archaeological sites.

M-CR-2

Although the Proposed Project is not directly responsible for the eroding condition of CA-SDI-16,881/H, mitigation for this impact would be a condition of project approval. A data-recovery excavation would be conducted to collect a sample of cultural material. This material would be cataloged and analyzed, and a report would be prepared to detail the methods and results of the data-recovery program.

Comparison of CPA and Proposed Project

The CPA and the Proposed Project have similar impacts, requiring the same mitigation measures.

Summary

An assessment of the historic and archaeological resources has indicated untested resources could be impacted by grading or brushing. Additionally, one archaeological site is being impacted by natural erosion. Mitigation is proposed that would require monitoring during grading or brushing. Testing of the eroding site is also required. With the proposed mitigation, impacts are reduced to below a level of significance and no further mitigation would be required.

4.5.1.4 Transportation and Traffic

The study area, study scenarios, trip distribution, existing conditions, and methodologies used for the CPA traffic analysis are the same as those used for the Proposed Project. Guidelines remain the same and are detailed in the traffic report, which is Appendix D of the ~~DEIR~~FEIR.

Intersection and Road Segments

Guideline A: Where roadway segments and intersections operate at LOS D or better impacts are not considered significant.

The CPA would put an estimated 408 ADT on area roadways. This volume was distributed over the existing road network and the effect on segments and intersections was evaluated. Existing traffic conditions were used for a baseline. Table 4-2-3, "Traffic Analysis Summary," shows the level of services as it exists and with the addition of consolidated project traffic (the last column in each table). As shown, road segments and intersections continue to operate at acceptable levels with the addition of CPA traffic. Guideline A is not exceeded and impacts are not significant. No mitigation is proposed.

Sight Distance

The CPA has the same two access points as the Proposed Project, and therefore the analysis of sight-distance for the CPA would have the same results. More detailed analysis for sight-distance is provided in Section 2.3.

The CPA would take access to local roads via Hoskings Ranch Road onto SR78/79 and onto Pine Hills Road via Tenaya Road, which is currently not built. The analysis encompasses these two access points, as well as a third intersection of SR-78/79 and Pine Hills Road.

It was determined that the operational speed at Hoskings Ranch Road is 58 mph for both eastbound and westbound, and 48 mph for northbound and 47 mph for southbound on Pine Hills Road. According to the County of San Diego Public Road Standards, the minimum intersection sight distance for 47, 48 and 58 mph are 470

feet, 480 feet and 580 feet, respectively. According to AASHTO, the minimum intersection sight distance for 43, 44 and 58 mph are 520 feet, 530 feet and 640 feet, respectively.

Corner Sight Distance

For the CPA access location all movements have adequate corner sight distance except for:

1. Left turn from Pine Hills Road onto SR-78/79 (Movement “B slows for A”).
2. Right turn from Tenaya Road onto Pine Hills Road (Movement “C slows for A”).

Figure 2-3-3, “Sight Distance Constraints,” shows the sight-distance analysis for these intersections.

From the Pine Hills Road looking right (Movement “B slows for A”), a distance of 580 feet of unobstructed visibility is required; the Proposed Project currently has 535 feet available. The sight distance is restricted by the existing embankment on the south side of the horizontal curve in the road. This may be acceptable because stopping sight distance is adequate for this maneuver. However, adequate corner sight distance can be met if the trees on the south side of the horizontal curve were trimmed or removed. This would be listed as a design consideration for the CPA, and would reduce all impacts to not significant.

From the Tenaya Road looking left (Movement “C slows for A”), a distance of 430 feet of unobstructed visibility is required; the Proposed Project currently has 400 feet available. The sight distance is restricted by trees on the west side of the horizontal curve in the road. However, adequate corner sight distance can be met if the trees on the west side of Pine Hills Road on/adjacent to the applicant’s property were removed, allowing for corner sight distance to increase to 745 feet. This would be listed as a design consideration for the Proposed Project, and would reduce all impacts to not significant.

Stopping Sight Distance

All movements were determined to have adequate stopping sight distance.

Because the listed design considerations would reduce impacts to less than significant for corner sight distance, and because stopping sight-distance requirements are met, no impacts are assessed for sight-distance. No mitigation is required.

Cumulative Impacts

The CPA generates 408 daily trips. Some of these trips would use roadways that were found in the course of the cumulative analysis to operate at inadequate levels of service. The CPA would therefore contribute to a significant cumulative impact (**Impact TR-1**) and mitigation is required.

The County of San Diego has adopted an overarching programmatic approach to address existing and projected future road deficiencies in the unincorporated area of San Diego County. This program includes the adoption of a Transportation Impact Fee (TIF) to fund improvements to roadways in order to mitigate potential cumulative impacts anticipated by traffic from future development.

Summary of Impacts

TR-1

The CPA has cumulative impacts because it places traffic on roads that operate at inadequate levels of service.

Mitigation

M-TR-1

The CPA would pay a TIF fee toward improvements to the local roadway network.

Comparison of CPA and Proposed Project

The CPA generates 420 ADT while the Proposed Project generates 946 ADT. The difference is related to agricultural traffic attributed to the Proposed Project, which is not a factor in the CPA proposal.

Summary

The level of traffic generated by the CPA was estimated and distributed to the existing roadway network. Computer simulations of existing and existing plus project scenarios were used to estimate impacts to both roadway segments and intersections. CPA project-level impacts were not significant. Sight distance at the main project entry would not be deficient with the removal of obstructing vegetation. Cumulative impacts are mitigated through payment of a TIF fee. These mitigation measures would fully mitigate all CPA impacts and no further mitigation is required.

4.6 Environmentally Superior Alternative

The NDA is the environmentally superior alternative because no changes to the present environmental setting are proposed. After the NDA, the Reduced Project Alternative (RPA) is the environmentally superior to the Proposed Project. Biological, cultural resource and traffic impacts would be significantly lower than the project and the other alternatives.

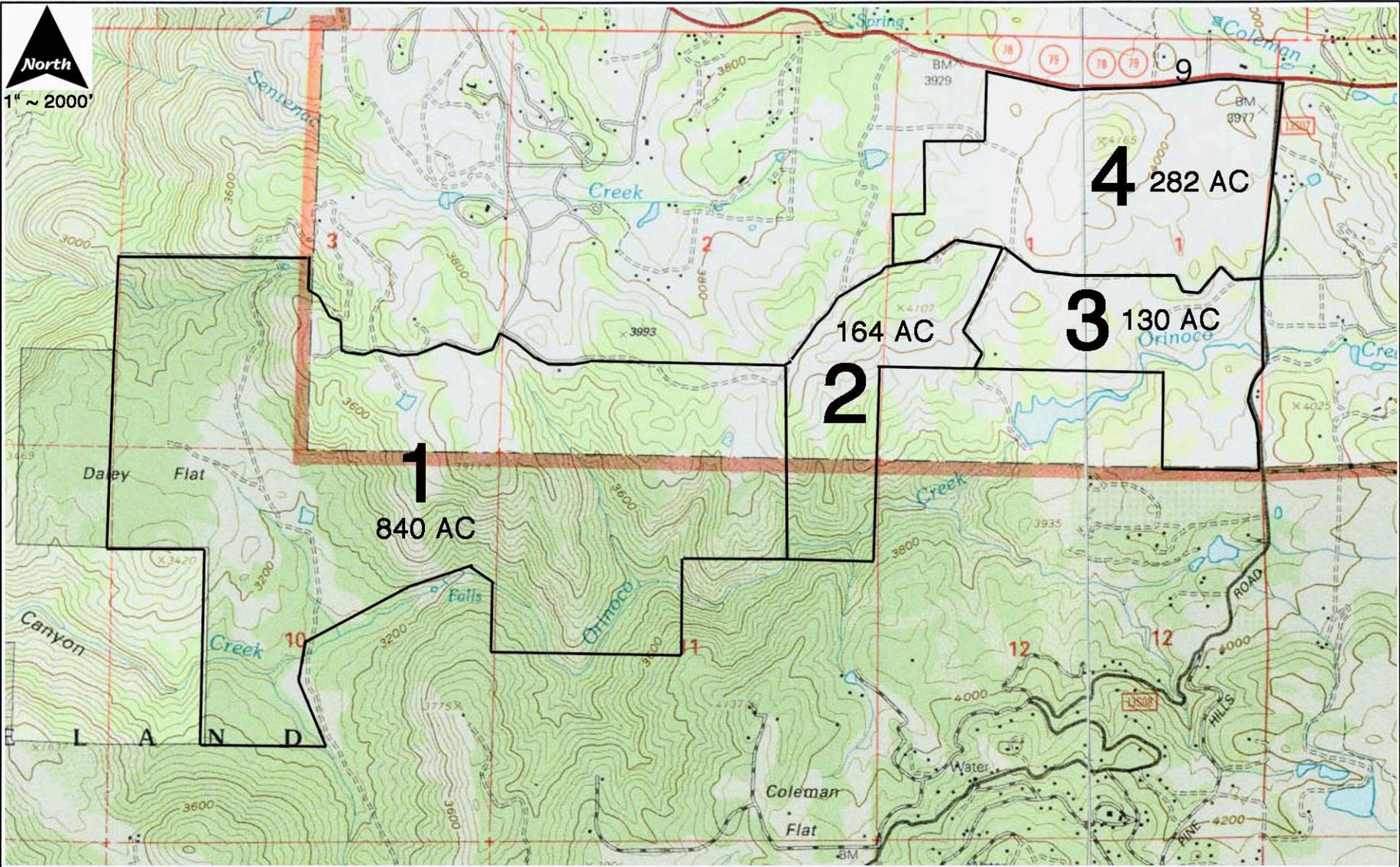
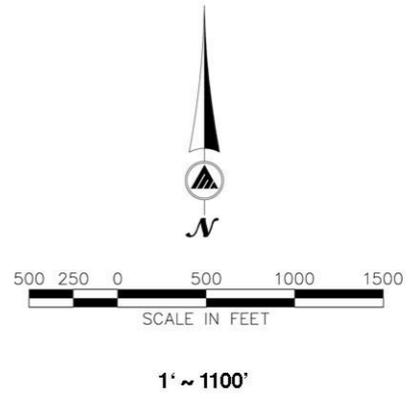
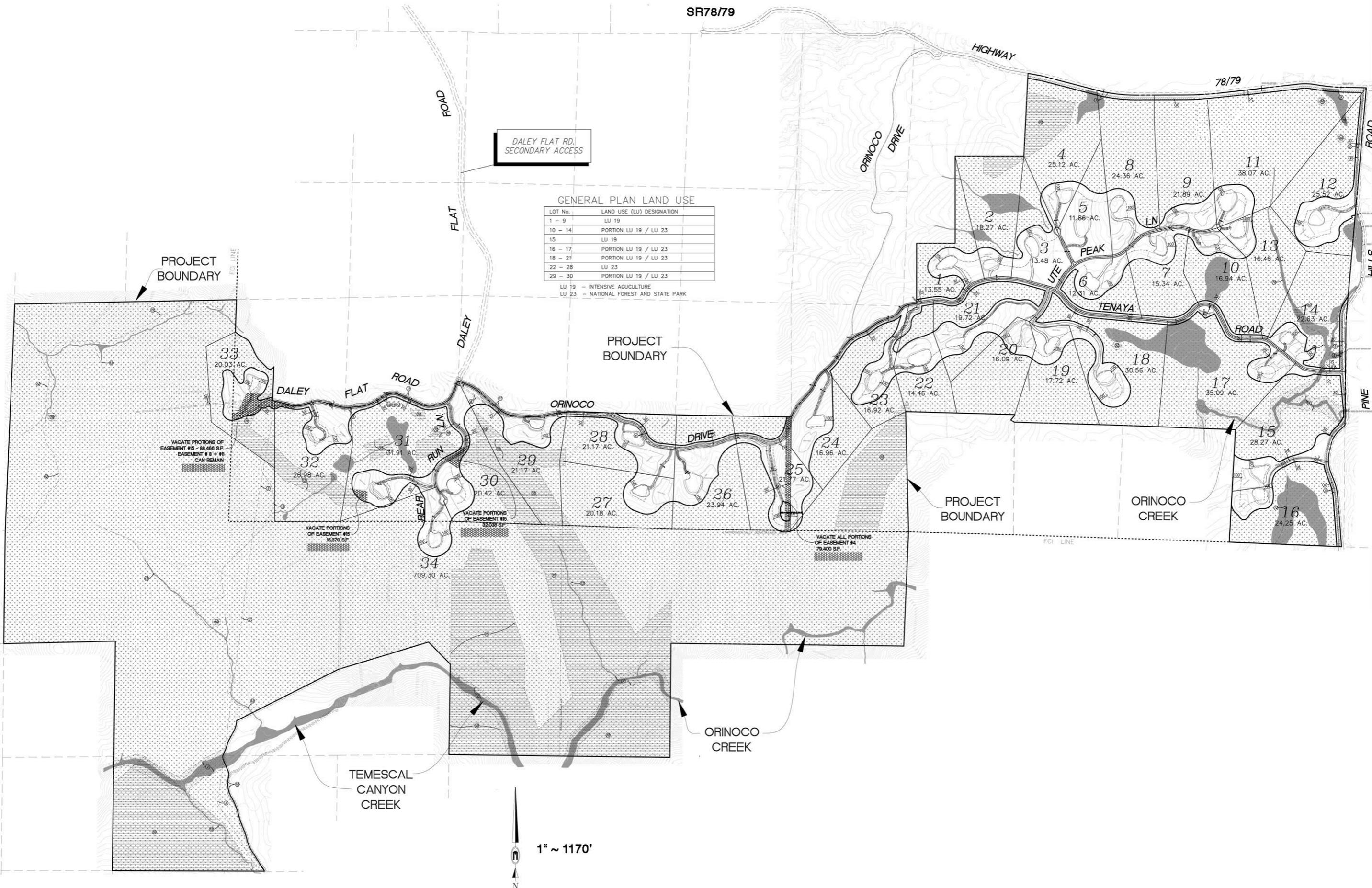


Figure
4-3-1

No Project Legal Lot Alternative







Project Open Space



Project Development Area

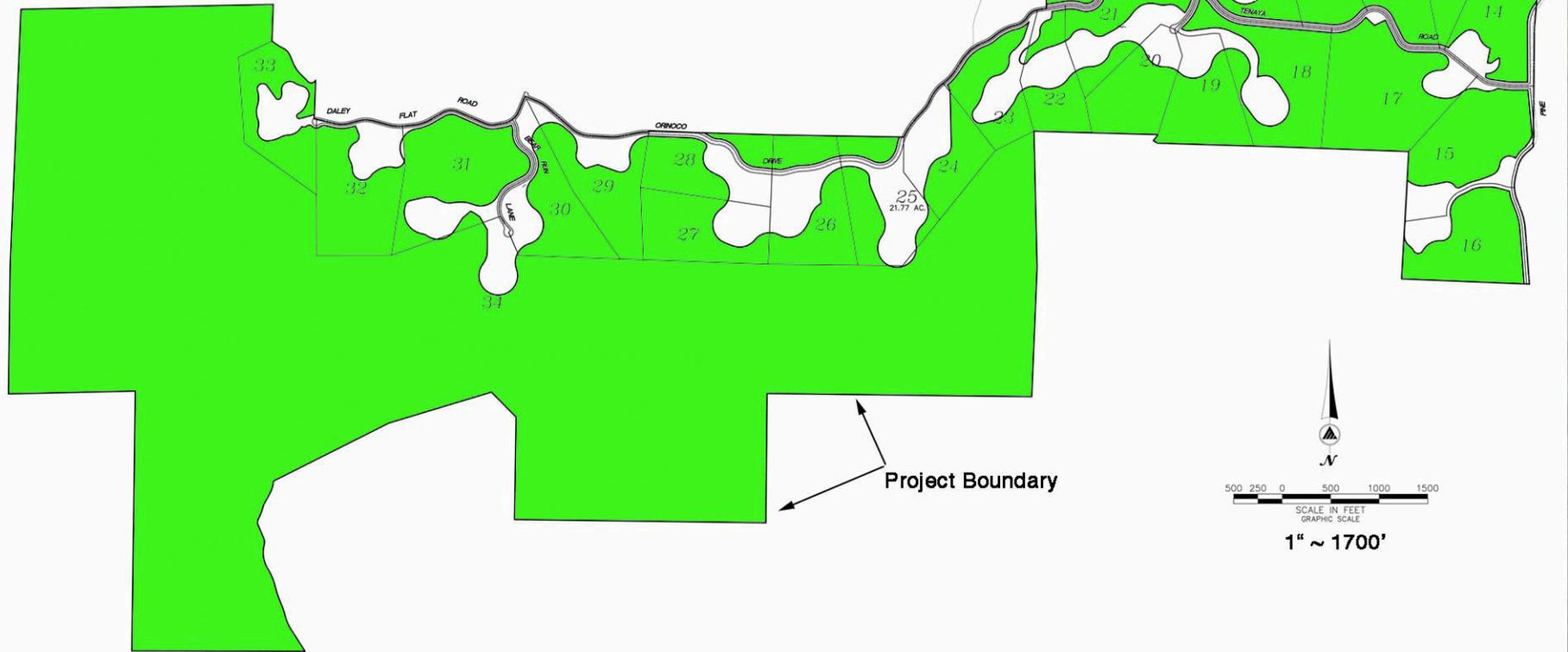


Figure 4-5-2

Consolidated Project Alternative Open Space



LEGEND

Fencing Outlines

- Proposed Fencing
- Not to be Fenced

Existing Open Space Easement

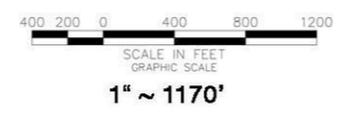
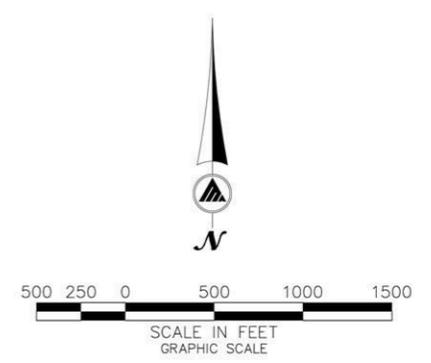
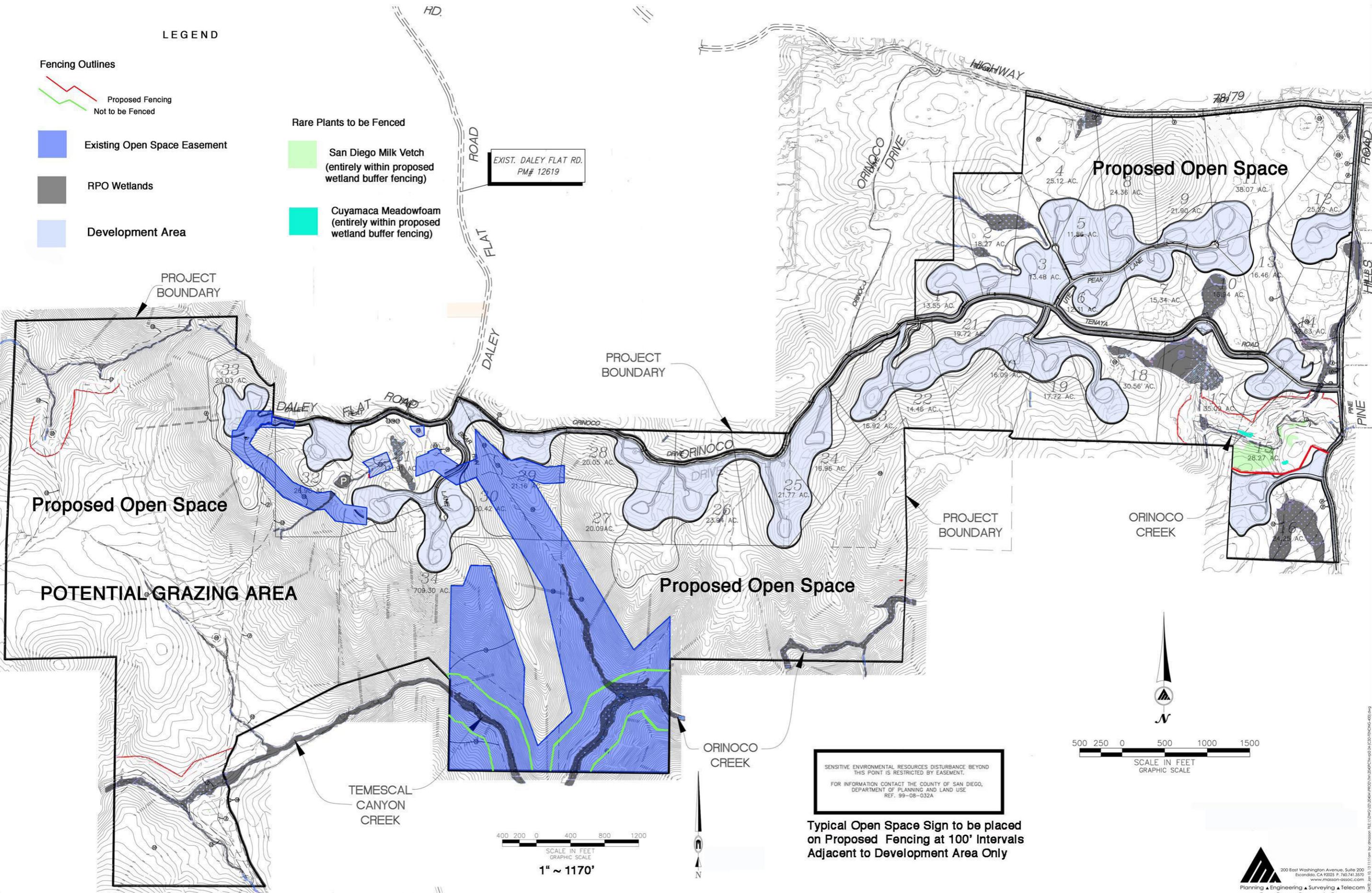
RPO Wetlands

Development Area

Rare Plants to be Fenced

San Diego Milk Vetch
(entirely within proposed wetland buffer fencing)

Cuyamaca Meadowfoam
(entirely within proposed wetland buffer fencing)



SENSITIVE ENVIRONMENTAL RESOURCES DISTURBANCE BEYOND THIS POINT IS RESTRICTED BY EASEMENT.
FOR INFORMATION CONTACT THE COUNTY OF SAN DIEGO, DEPARTMENT OF PLANNING AND LAND USE, REF. 99-08-032A

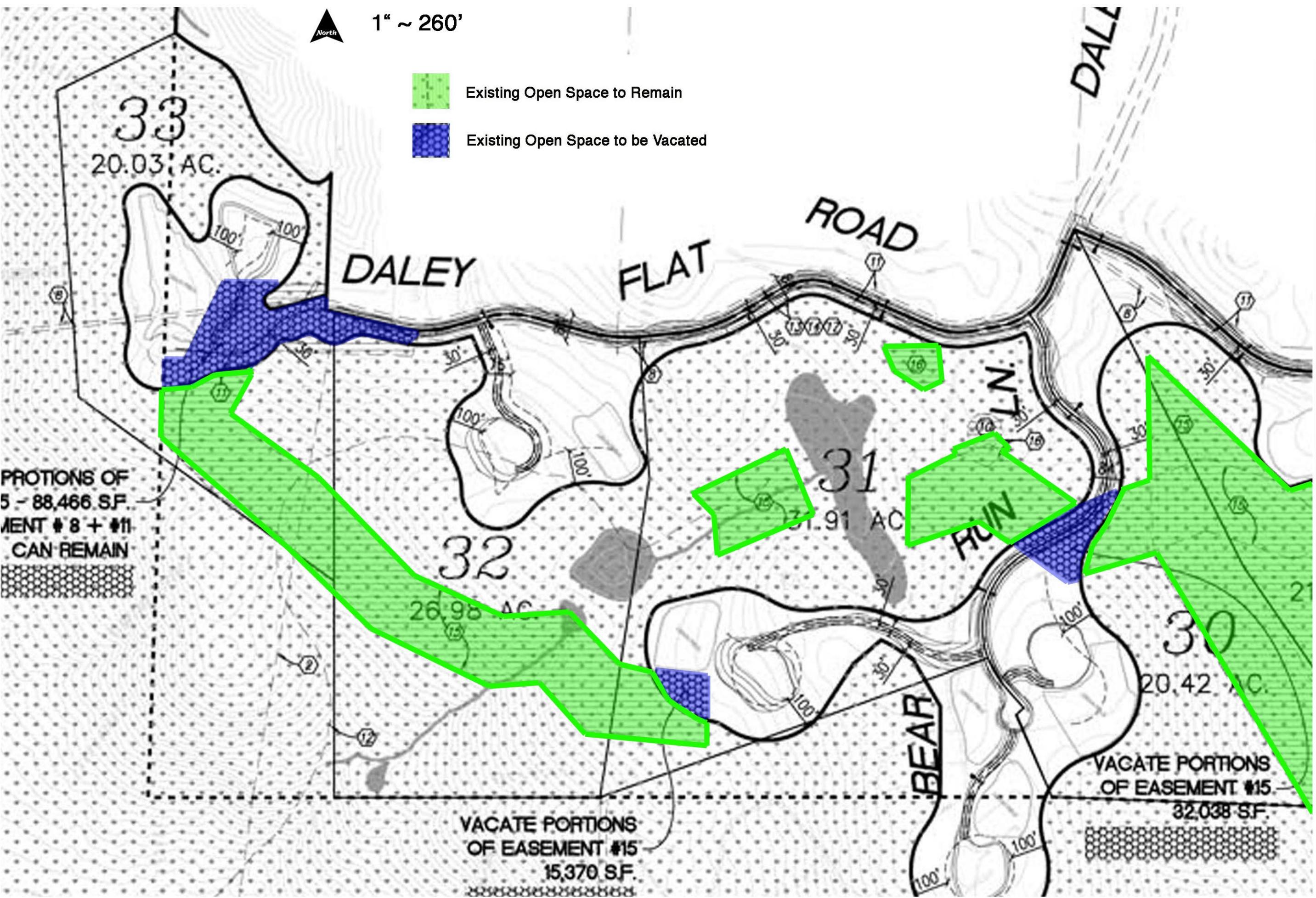
Typical Open Space Sign to be placed on Proposed Fencing at 100' Intervals Adjacent to Development Area Only

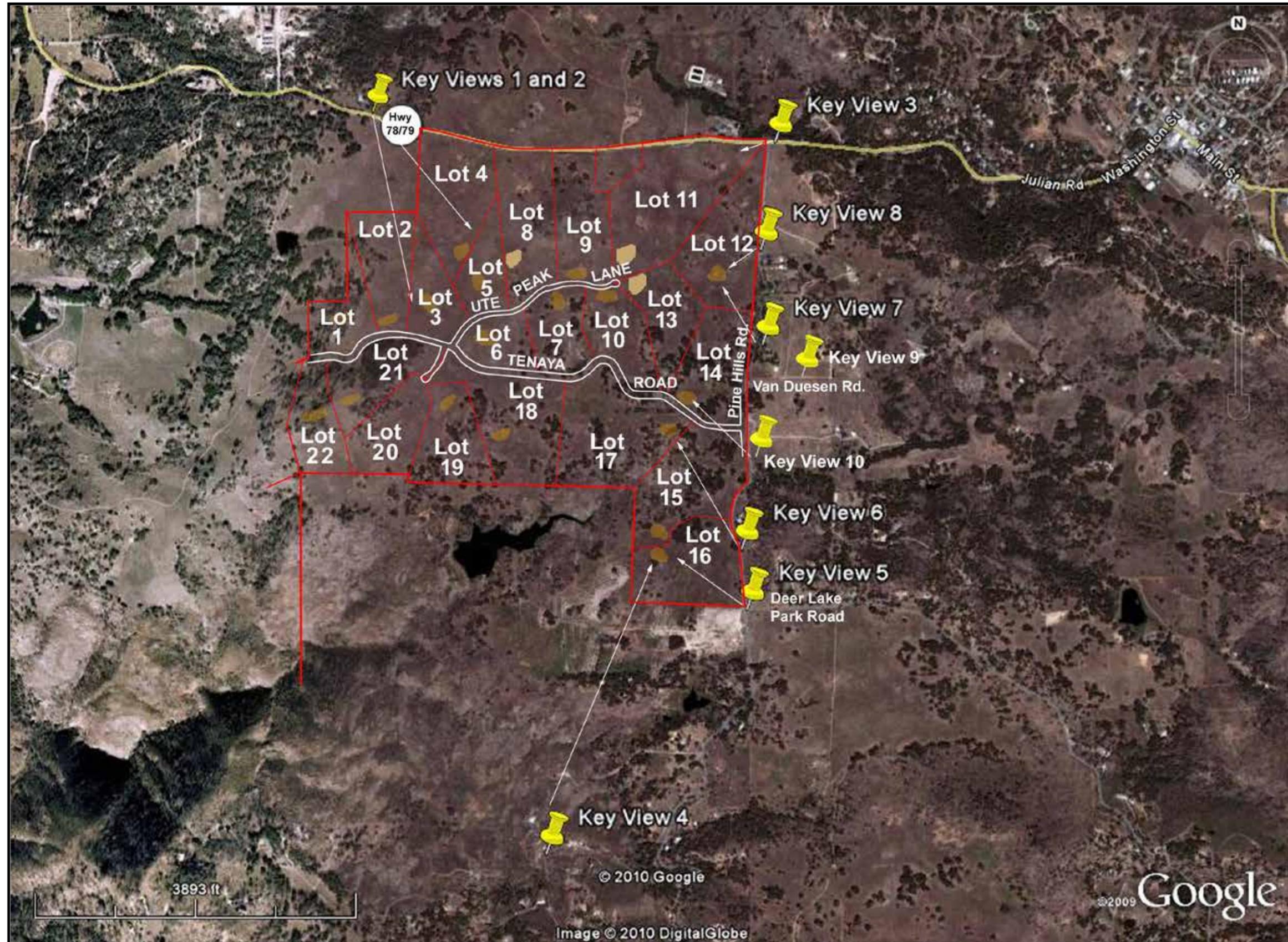
Figure 4-5-3



1" ~ 260'

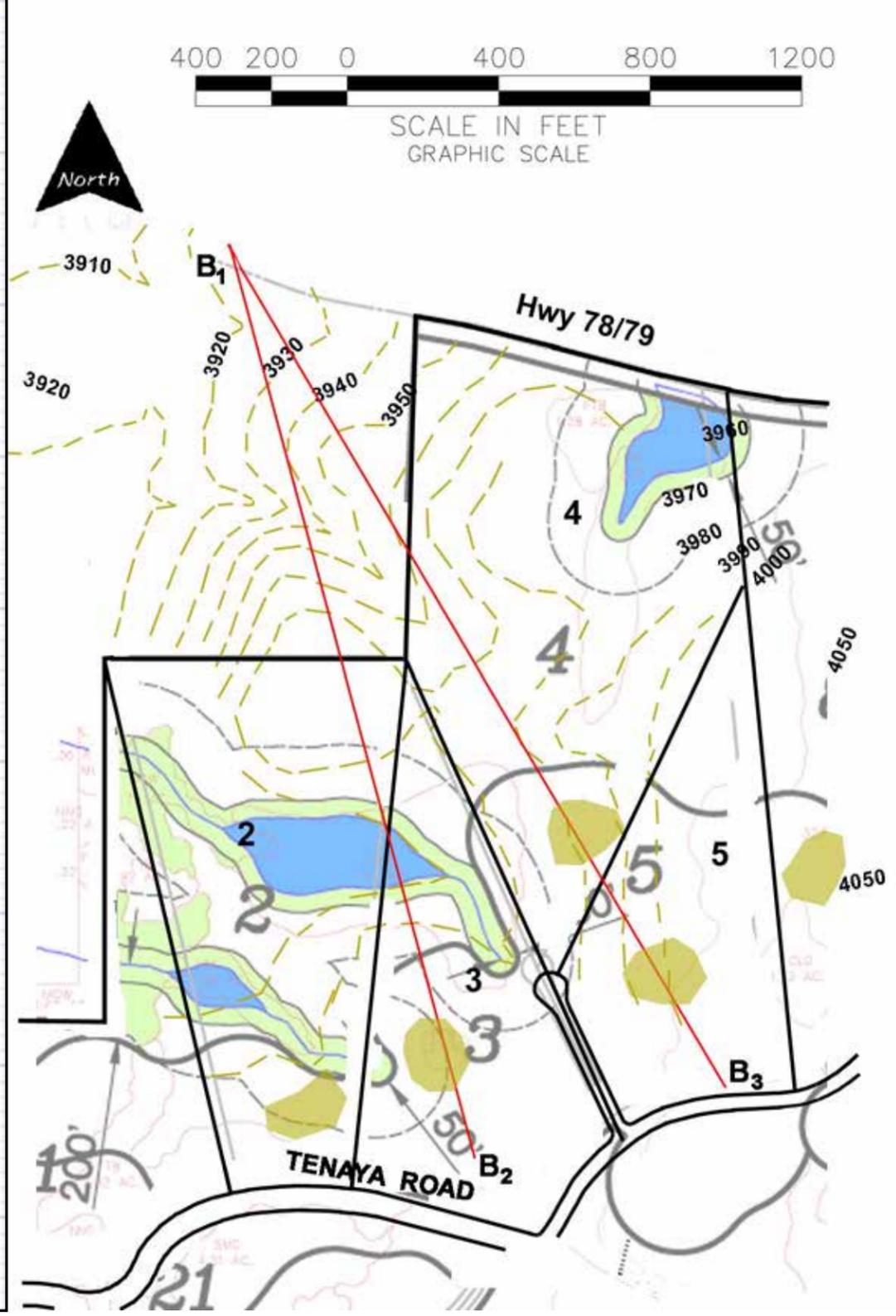
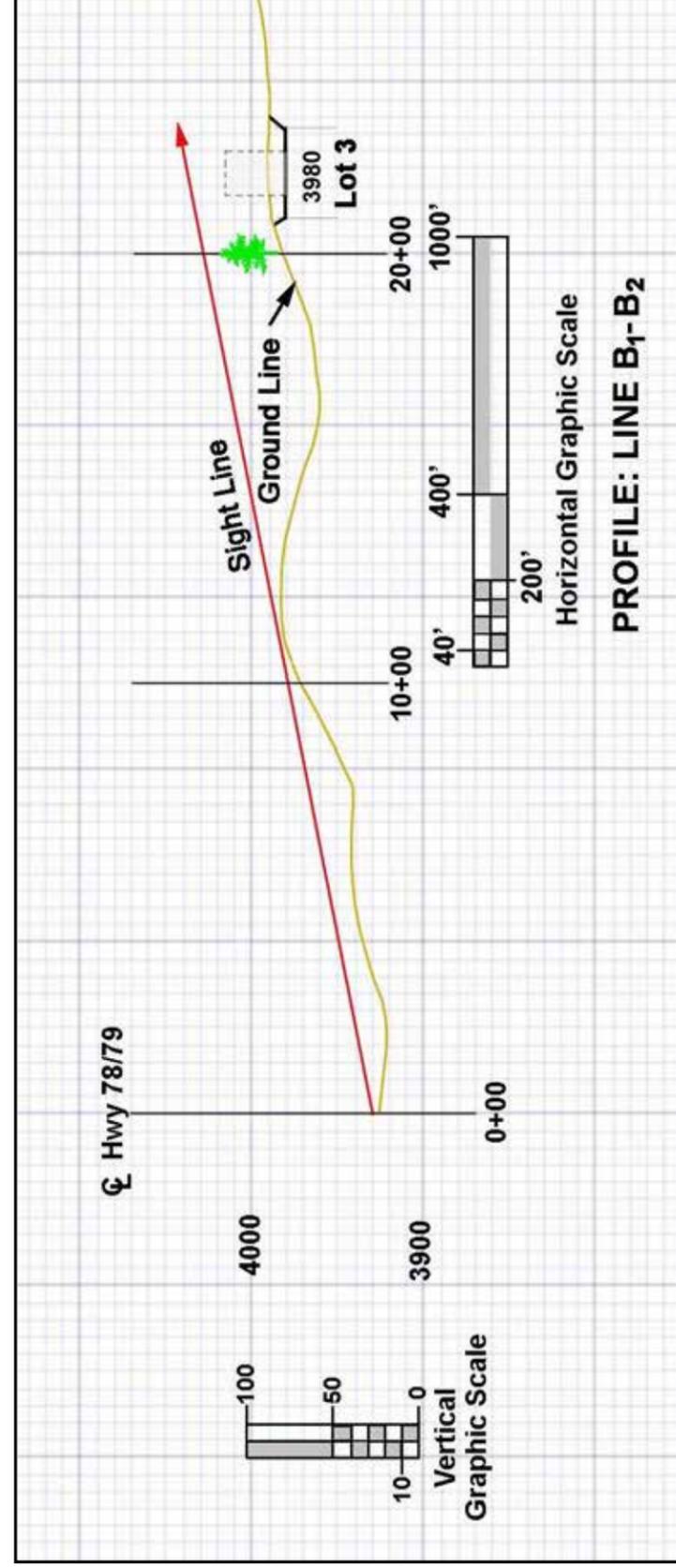
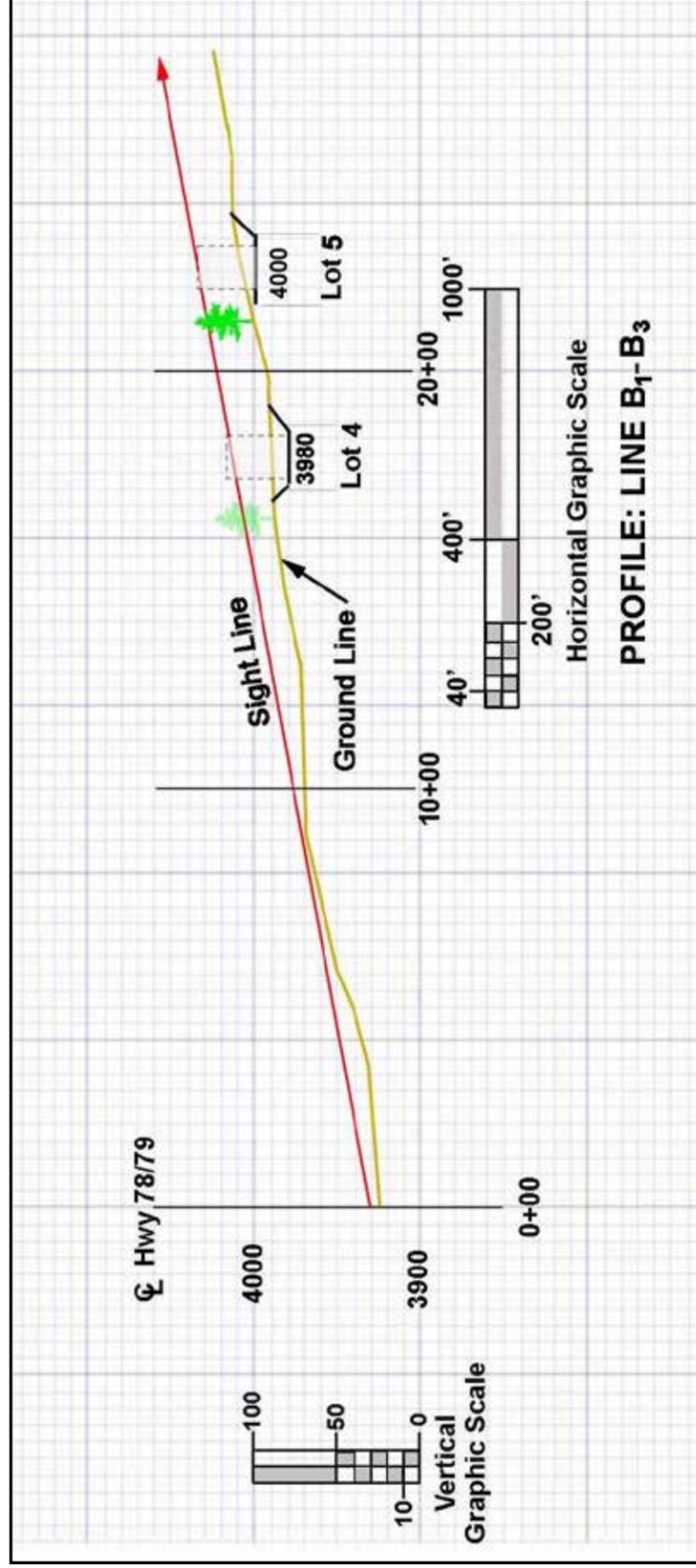
- Existing Open Space to Remain
- Existing Open Space to be Vacated





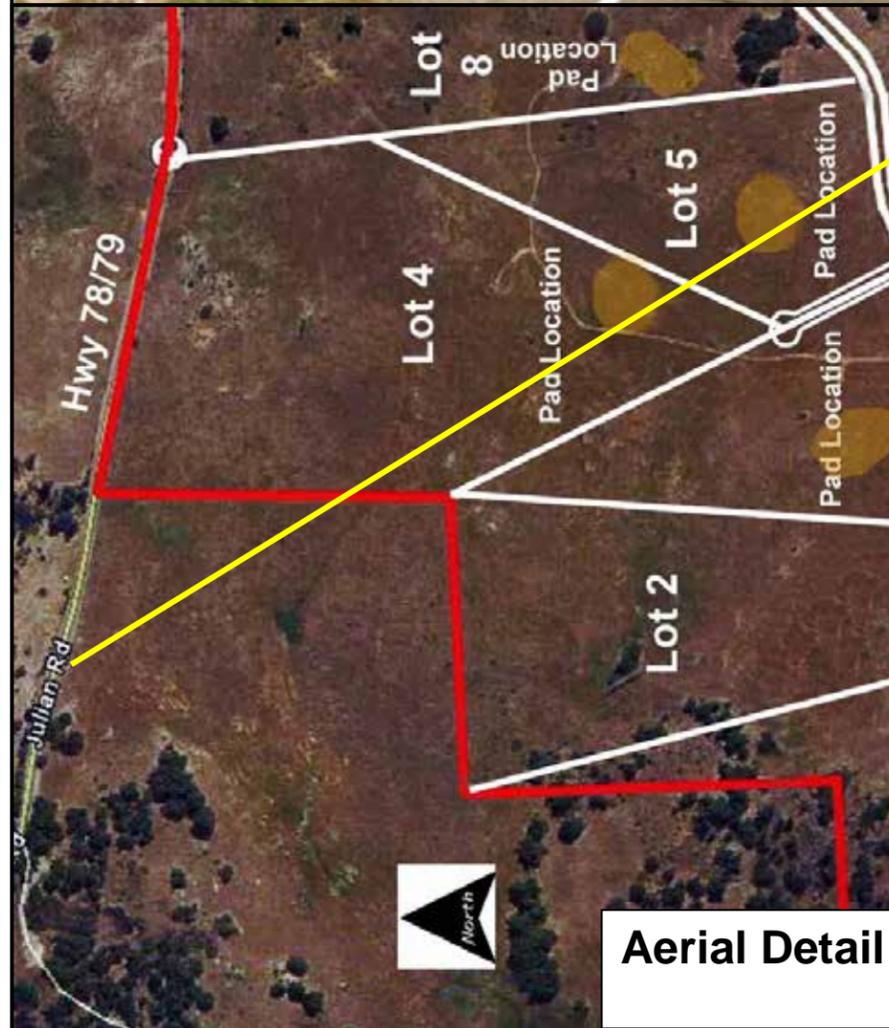
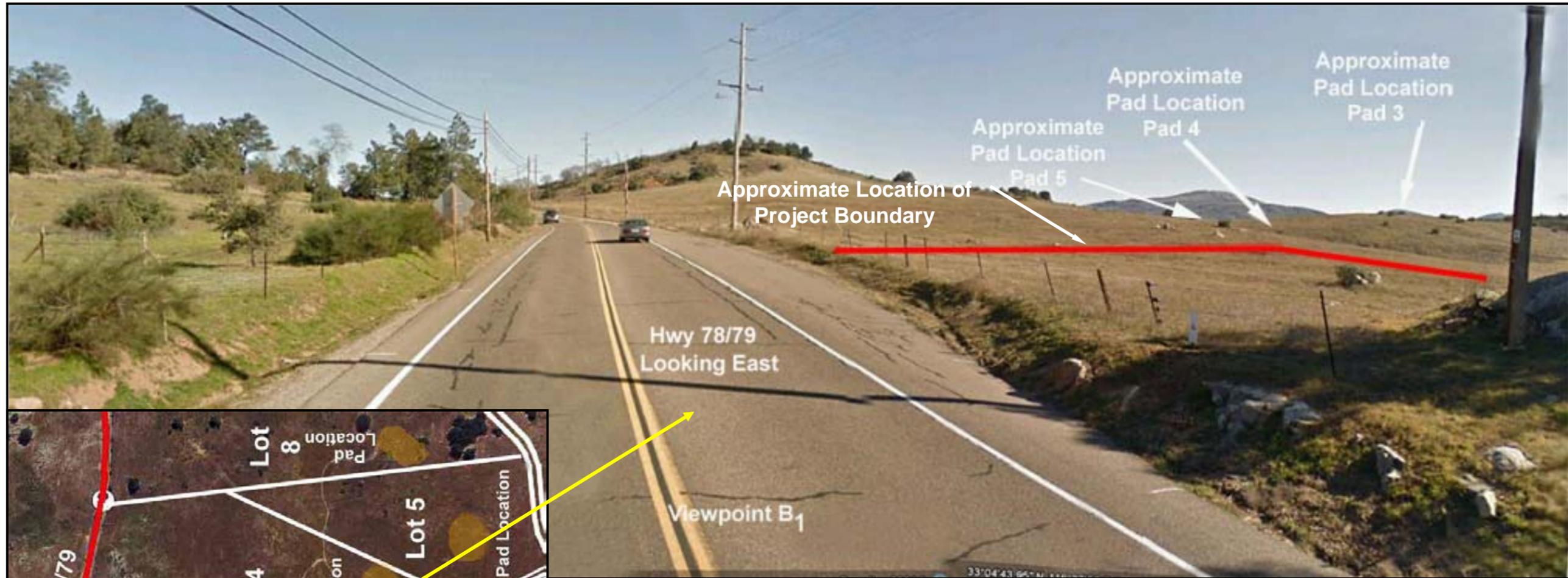
KEY VIEW
Index

Figure
4-5-5



KEY VIEWS 1 and 2
SR 78/79
Plan and Profile, Looking East

Figure 4-5-6



Aerial Detail of pad relationship to Hwy 78/79

KEY VIEWS 1 and 2
Photosimulation SR 78/79, Looking East

Figure 4-5-7



Upper View

The perspective is that of travelers approaching the site from the east, looking to the west.

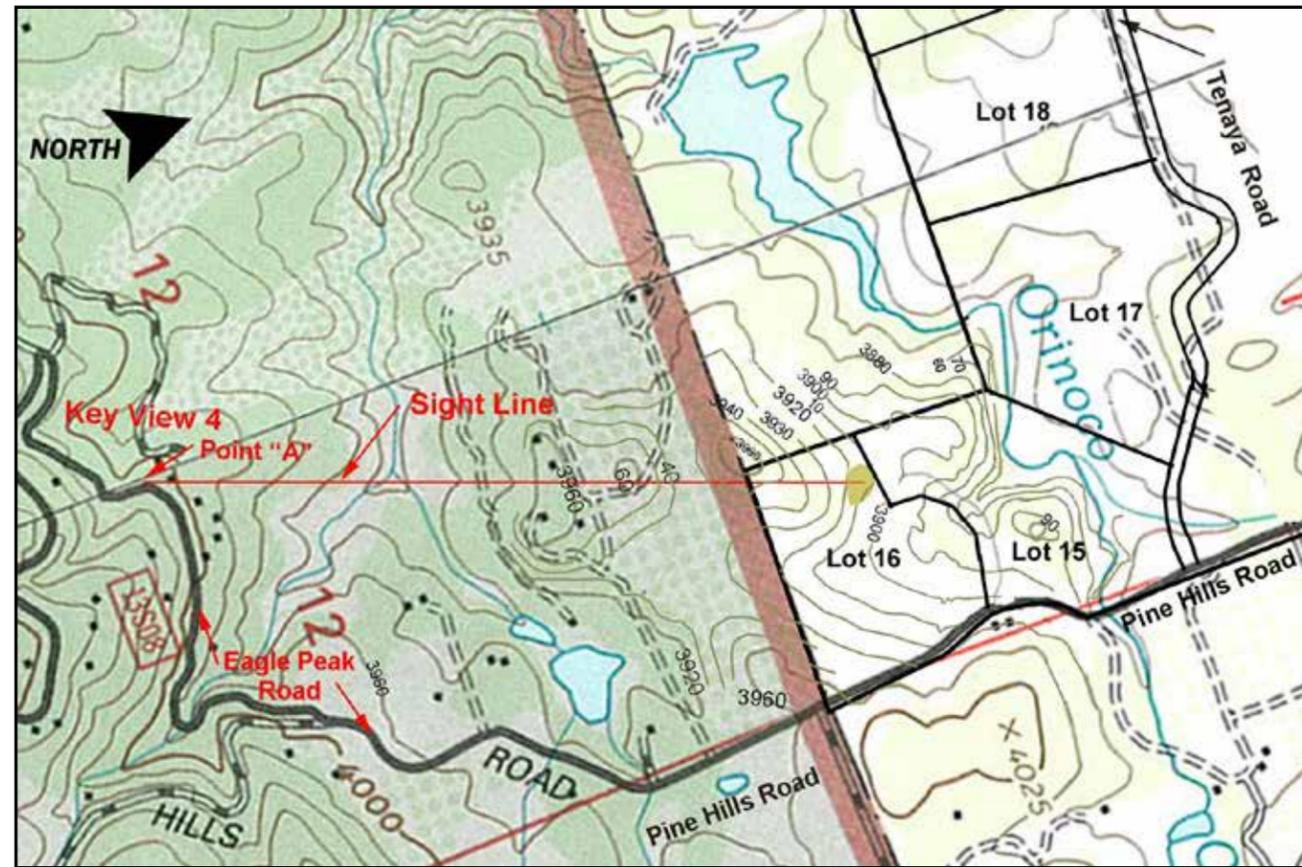
Lower View

An enlarged view of the northeast corner of the project site: Pine Hills Road at SR 78/79.



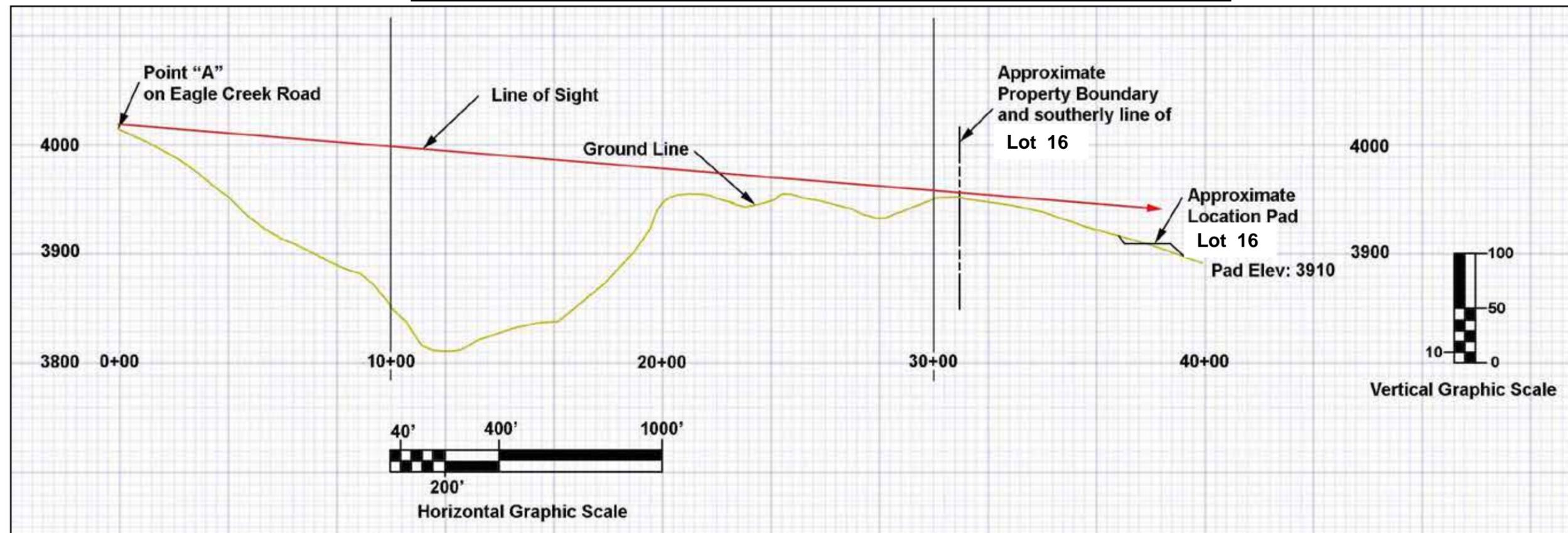
KEY VIEW 3
SR 78/79 Looking West

Figure 4-5-8



Datum is from USGS Mapping.

See Figure 11 for photosimulation of the view.



KEY VIEW 4
Looking North from Pine Hills Residential Area

Figure 4-5-9



KEY VIEW 4
Photosimulation

Figure
4-5-10



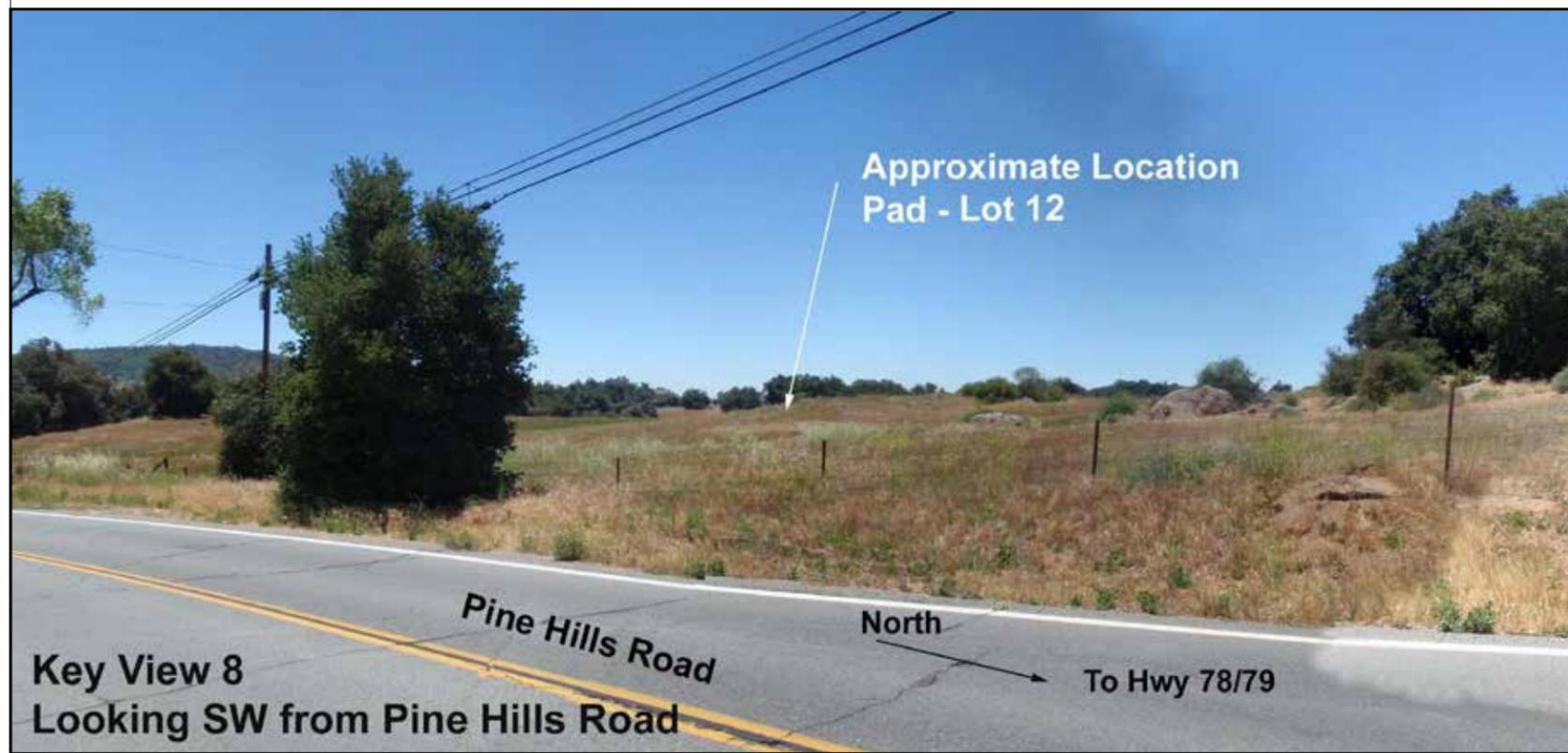
KEY VIEW 5
From Southeast Corner of Project
Deer Lake Park Rd. at Pine Hills Rd.

Figure
4-5-11



KEY VIEW 6
Looking Northwest from Pine Hills Road

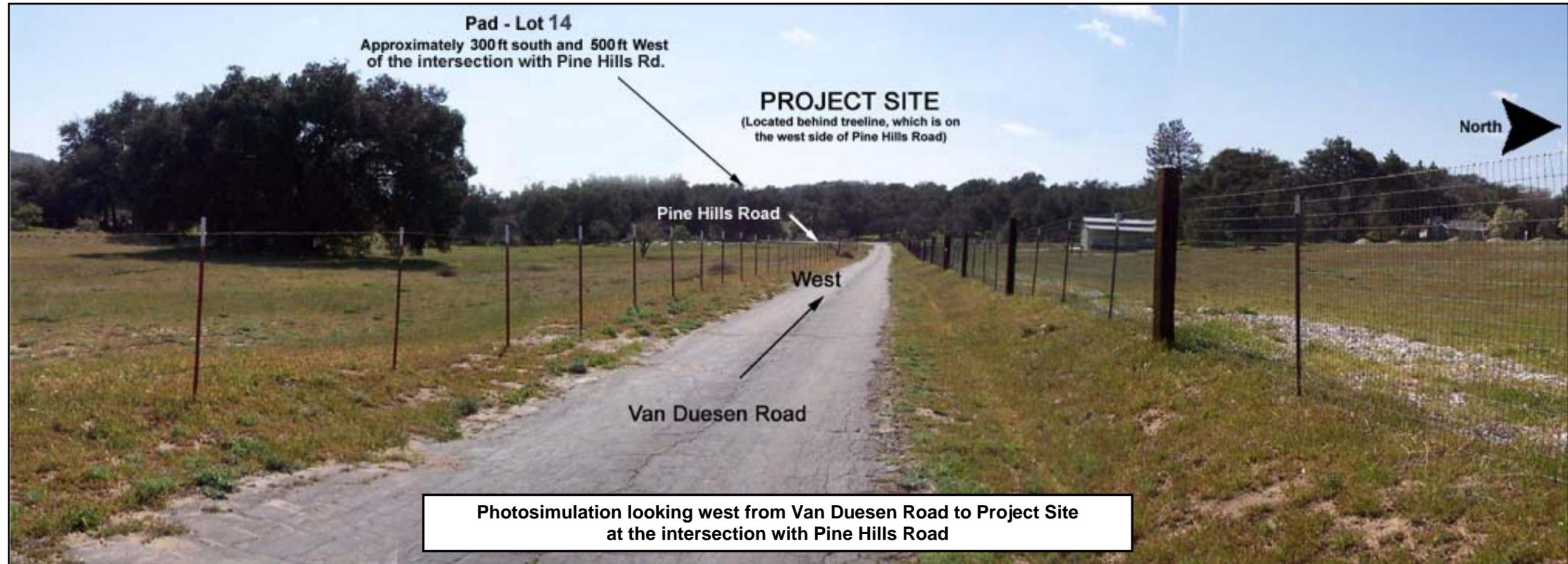
Figure
4-5-12



Detail of Key View Locations

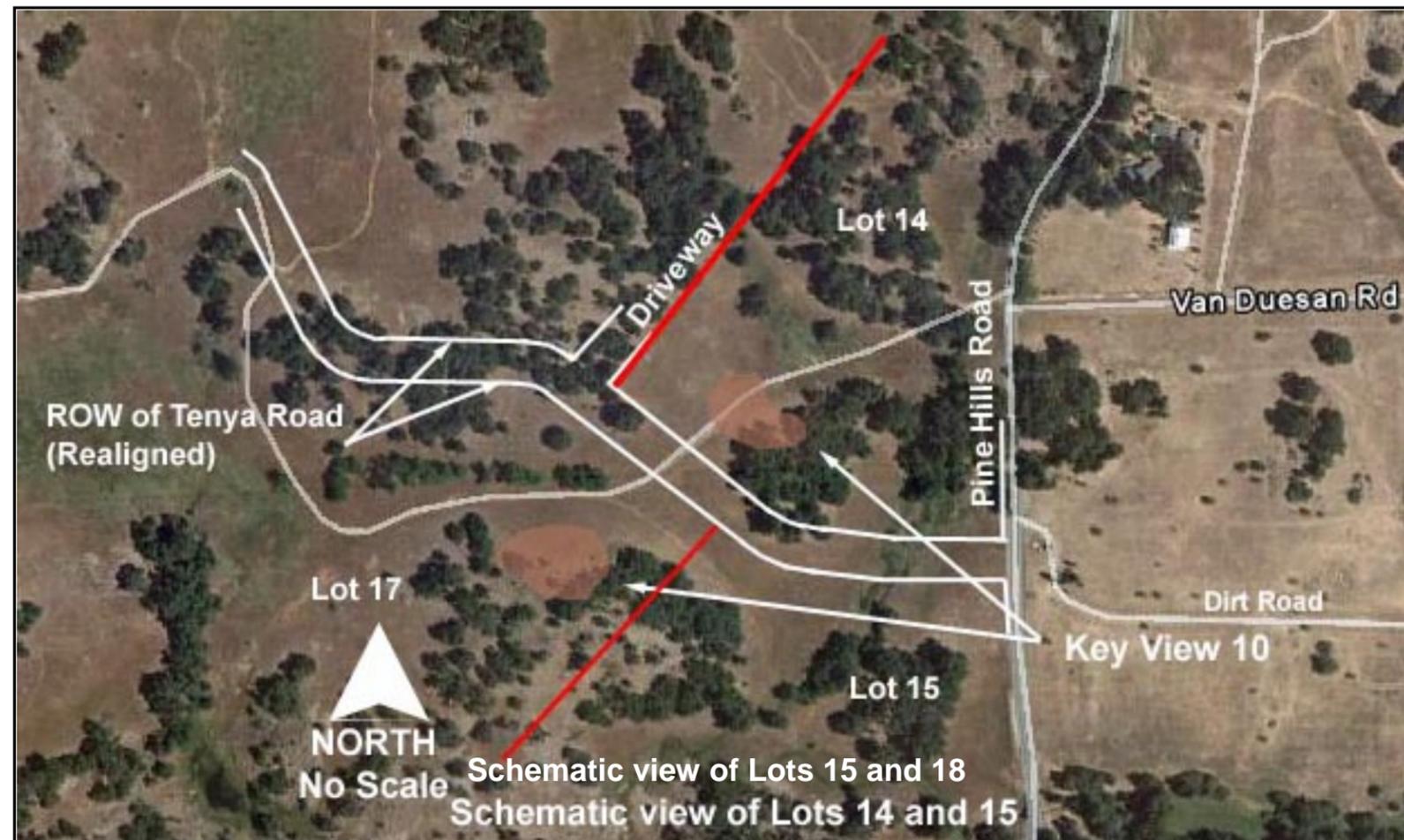


Key View 7 and Key View 8
From Pine Hills Road



KEY VIEW 9
Looking West from Van Duesen Road

Figure
4-5-14

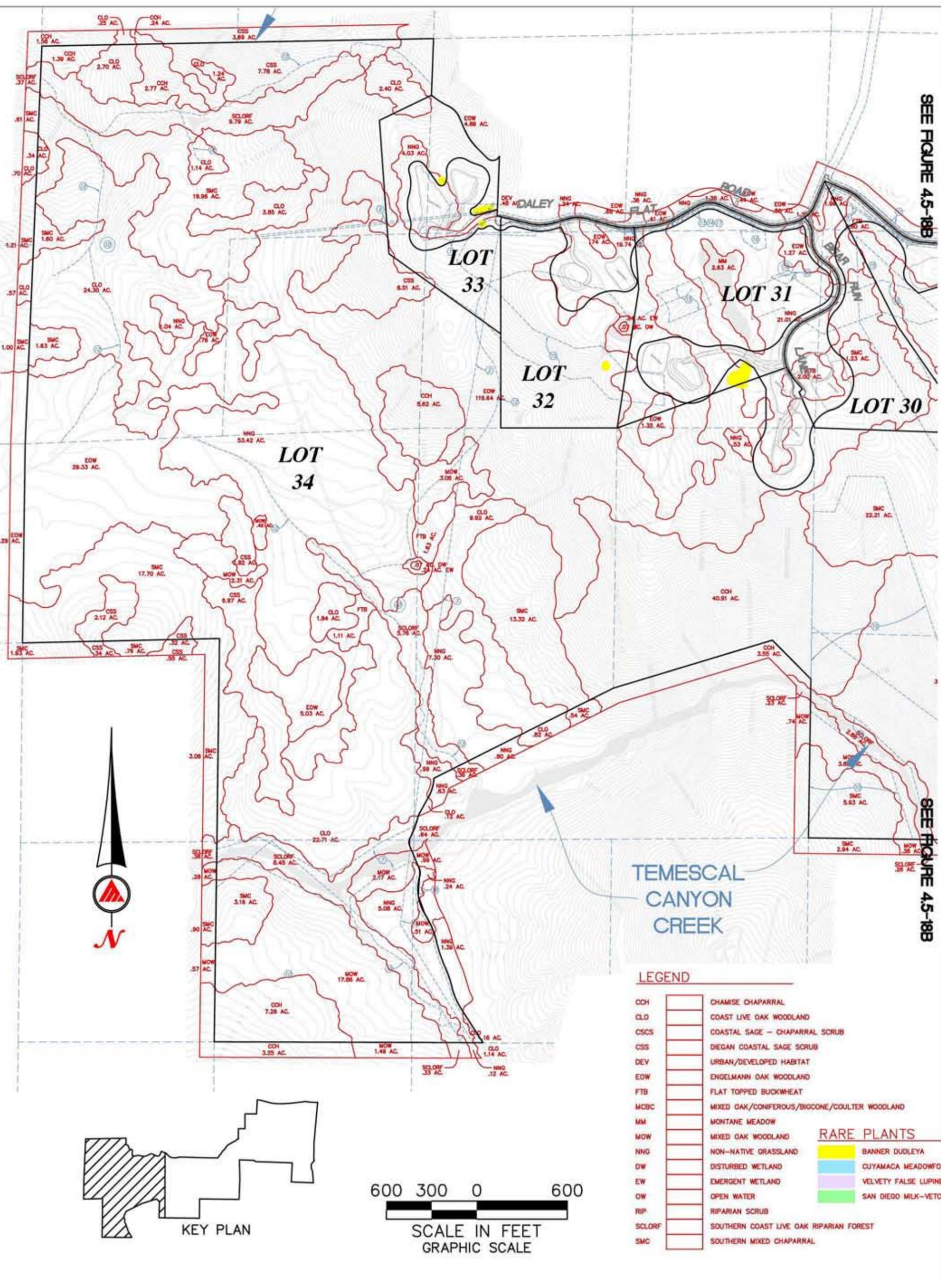


Key View 10
Looking North on Pine Hills Rd.

Figure 4-5-15

SEE FIGURE 4-5-18B

SEE FIGURE 4-5-18B



LEGEND

CCH	CHAMISE CHAPARRAL		
CLO	COAST LIVE OAK WOODLAND		
CSCS	COASTAL SAGE - CHAPARRAL SCRUB		
CSS	DIEGAN COASTAL SAGE SCRUB		
DEV	URBAN/DEVELOPED HABITAT		
EDW	ENGELMANN OAK WOODLAND		
FTB	FLAT TOPPED BUCKWHEAT		
MCBC	MIXED OAK/CONIFEROUS/BIGGONE/COULTER WOODLAND		
MM	MONTANE MEADOW		
MOW	MIXED OAK WOODLAND		
NNG	NON-NATIVE GRASSLAND		
DW	DISTURBED WETLAND		
EW	EMERGENT WETLAND		
OW	OPEN WATER		
RIP	RIPARIAN SCRUB		
SCLORF	SOUTHERN COAST LIVE OAK RIPARIAN FOREST		
SMC	SOUTHERN MIXED CHAPARRAL		
		RARE PLANTS	
			BANNER DUDLEYA
			CUYAMACA MEADOWFOAM
			VELVETY FALSE LUPINE
			SAN DIEGO MILK-YETCH

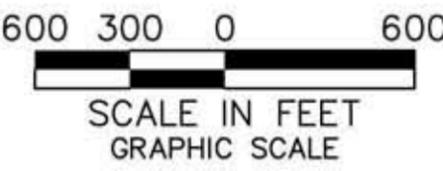
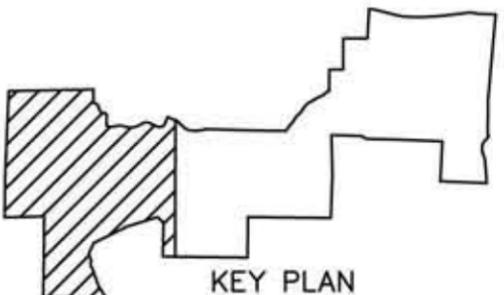
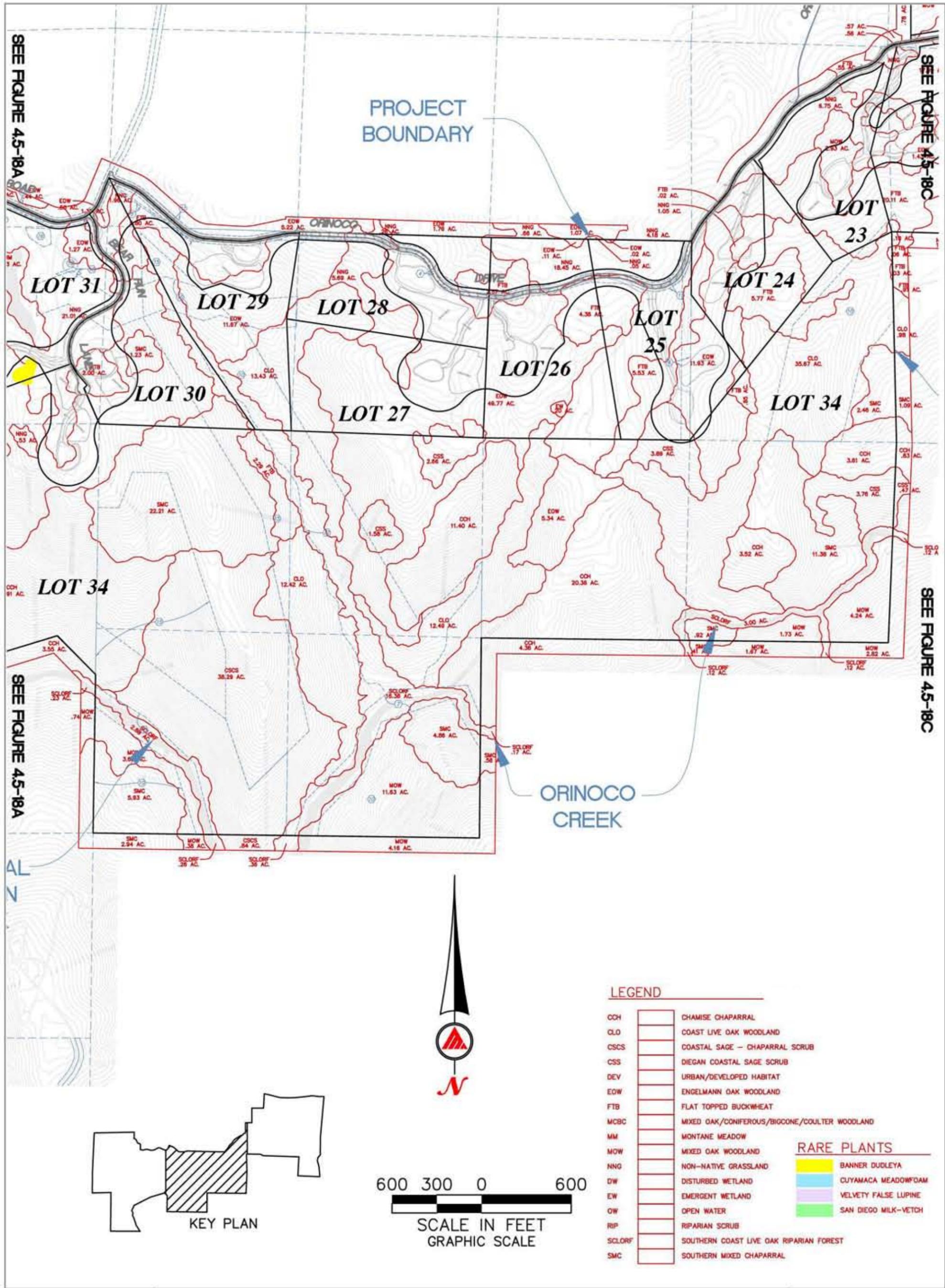


FIGURE 4-5-18A

CONSOLIDATED PROJECT ALTERNATIVE BIOLOGICAL RESOURCES - WEST





SEE FIGURE 4.5-18A

SEE FIGURE 4.5-18C

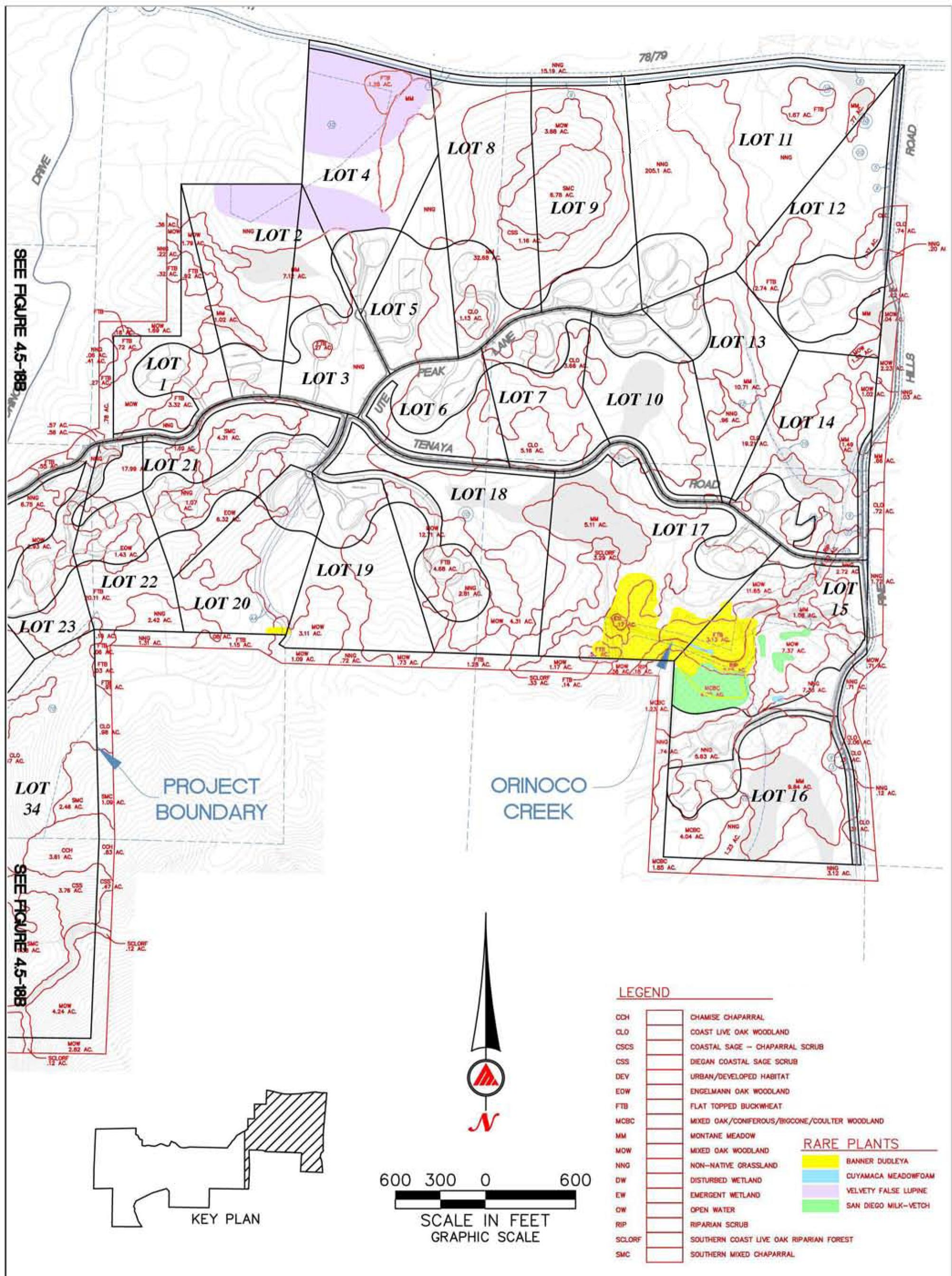
SEE FIGURE 4.5-18A

SEE FIGURE 4.5-18C

4-5-18B
FIGURE

**CONSOLIDATED PROJECT ALTERNATIVE
BIOLOGICAL RESOURCES - CENTRAL**





SEE FIGURE 4-5-18B

SEE FIGURE 4-5-18B

4-5-18C
FIGURE

CONSOLIDATED PROJECT ALTERNATIVE
BIOLOGICAL RESOURCES MAP - EAST





**Figure
4-5-19**

Consolidated Project Alternative - RPO Encroachments



Biological Impact Table – Consolidated Project Alternative

Habitat	Existing Acres	Development Impact Acres	Open Space Vacation Impact Acres	“Impact Neutral” Acres
<u>Southern Mixed Chaparral</u>	117.5	2.0	0.00	26.9
<u>Chamise Chaparral</u>	96.9	0.00	0.00	12.7
<u>Diegan Coastal Sage Scrub</u>	40.6	1.0	0.00	1.5
<u>Flat-top Buckwheat</u>	71.4	18.1	0.00	6.0
<u>Coastal Sage–Chaparral Scrub</u>	38.3	0.00	0.00	23.8
<u>Coast Live Oak Woodland</u>	175.8	6.3	0.00	51.6
<u>Engelmann Oak Woodland</u>	246.0	35.5	1.00	42.4
<u>Mixed Oak Woodland</u>	115.0	14.1	0.00	45.3
<u>Mixed Oak/.../Coulter</u>	8.7	1.8	0.00	2.8
<u>Non-native Grassland</u>	375.8	103.9	1.3	9.5
<u>Montane Meadow</u>	76.3	17.0	0.00	1.1
<u>Southern CLO Riparian Forest</u>	49.53	0.00	0.00	47.54
<u>Open Water</u>	0.07	0.00	0.00	0.00
<u>CVF Marsh/Emergent Wetland</u>	0.85	0.00	0.00	0.17
<u>Riparian Scrub</u>	3.21	0.25	0.00	2.96
<u>Disturbed Wetland</u>	0.07	0.00	0.00	0.00
<u>Urban/Developed Habitat</u>	0.8	0.00	0.00	0.00
<u>Totals (rounded)</u>	1416.8	199.9	2.3	274.3



**Biological Impact Table –
Consolidated Project Alternative**

**Table
4-2-1**

Existing Roadway Segment Conditions – Consolidated Project Alternative

Roadway Segment	Lanes/ Class	LOS E Capacity	Existing			Existing + Consolidated Project			Δ Traffic	Δ v/c	Direct Impact?	CMP Impact?
			ADT	V/C	LOS	ADT	V/C	LOS				
SR-78/79												
SR-79/Washington St to Hoskings Ranch Rd	2SR	22,900	3,561	0.156	C	3,835	0.167	C	274	0.012	No	No
Hoskings Ranch Rd to Pine Hills Rd	2SR	22,900	4,095	0.179	C	4,339	0.189	C	244	0.011	No	No
Pine Hills Rd												
south of SR-78/79	2RC	16,200	1,651	0.102	A	1,965	0.121	B	314	0.019	No	No

Note: 2RC: 2-lane Rural Collector; 2SR: 2-lanes State Route.

Existing Intersection Conditions – Consolidated Project Alternative

Intersection	Peak Hour	Existing		Existing + Consolidated Project Alternative		Δ Trips	Δ Delay	Direct Impact ?	CMP Impact ?
		Delay	LOS	Delay	LOS				
1. SR-78 & SR-79/Washington St ¹	AM	10.4	B	10.6	B	NA	0.2	No	No
	PM	13.0	B	13.3	B	NA	0.3	No	No
2. SR-78/79 & Hoskings Ranch Rd ¹	AM	9.0	A	9.6	A	NA	0.6	No	No
	PM	9.8	A	10.1	B	NA	0.3	No	No
3. SR-78/79 & Pine Hills Rd ¹	AM	10.1	B	10.5	B	NA	0.4	No	No
	PM	10.4	B	10.8	B	NA	0.4	No	No
4. Tenaya Rd & Pine Hills Rd ¹	AM	8.8	A	9.6	A	NA	0.8	No	No
	PM	8.6	A	9.6	A	NA	1.0	No	No

¹ Significance of unsignalized intersections is determined by the number of added project trips to the critical movement.

Note: The change in trips added to the critical movement are only reported for intersections operating at LOS E or F.

