

SUMMARY

S.1 Project Synopsis

This ~~Draft-Final~~ Environmental Impact Report (~~DEIR~~FEIR) pertains to the 1,416.5-acre Project Site known as Hoskings Ranch (Proposed Project). The Project Site is located in the unincorporated area of east-central San Diego County, approximately one mile southwest of the unincorporated town of Julian. State Route 78/79, also known as Firefighter Steven Rucker Memorial Highway (SR 78/79), forms its northern boundary, with Pine Hills Road to the east providing the main access route to the Project Site. Figure S-1, "Regional Vicinity Map," shows the Proposed Project's location within the County of San Diego.

The Proposed Project would subdivide the property into 24 lots, each with a minimum lot size of 40 acres. The subdivided lots would include active agriculture and a residence. ~~In addition, the Proposed Project would provide a 5.0-acre lot to the Julian/Cuyamaca Fire Protection District (JCFPD) as a public service. No use for this lot is proposed as part of the Proposed Project. However, a 20 x 40 foot garage is contemplated by the JCFPD and its potential environmental impacts have been assessed in this DEIR.~~ The Proposed Project would be served by groundwater and individual septic systems.

The undeveloped Project Site is located in a rural setting and is currently used for cattle grazing/breeding. A cattle loading chute and related corral are located near the northeast corner of the site. Uses surrounding the property consists of estate residential lots, agriculture, open space, and open land. The elevations onsite range from 3,100 feet above mean sea level (AMSL) to 4,200 feet AMSL. Figure S-2, "Aerial Photograph," shows the rural setting of the site and its surroundings.

The Proposed Project is subject to the Historic General Plan (HGP) that was in effect pre-August 2011, because it meets the requirement for pipelining adopted by the Board of Supervisors. The site has a Regional Category of Environmentally Constrained Areas (ECA) primarily because the site has been designated as an Agricultural Preserve. The Project Site has a Land Use Designation of (19) Intensive Agricultural which permits minimum parcel sizes of 2, 4, and 8 acres depending on slope and other factors. It is zoned A72 (8), which allows one dwelling unit per eight acres. A portion of the site (680 acres) is within the Cleveland National Forest. The Proposed Project is subject to a Williamson Act contract which requires lots to be a minimum of 40 acres.

S.2 Summary of Significant Effects and Mitigation Measures that Reduce or Avoid the Significant Effects

Table S-1, "Summary of Significant Effects and Mitigation Measures that Reduce the Significant Effects," provides a summary of significant environmental impacts resulting from the Proposed Project and mitigation measures that are required to reduce and/or avoid the environmental effects. Conclusions are provided stating whether or not the impact would be mitigated to below a level of significance. All project impacts are either not significant or are mitigated to below a level of significance. Detailed analyses of significant environmental effects and mitigation are provided in Chapters 2.0 (effects found to be significant) and 3.0 (effects found to be not significant) of this ~~DEIR~~FEIR.

In addition to mitigation measures, County regulatory standards for grading, construction, and environmental protection have been incorporated into the Proposed Project design to avoid or reduce adverse environmental effects. These include erosion controls, adherence to public and private road design standards, dust and noise management during grading and the control of

runoff, and a fire protection plan for future residences. Mitigation measures and design considerations are included as Chapter 7.0 of the EIR, List of Mitigation Measures and Environmental Design Considerations.

S.3 Areas of Controversy

A Notice of Preparation (NOP) was distributed on August 28, 2003 for a 30-day public review and comment period. Public comments were received on the NOP for this EIR and reflect concern or controversy over a number of environmental issues. Refer to Appendices T and U for the NOP and NOP comment letters. Issues raised in the NOP comment letters include concerns regarding the following issue areas:

- Agriculture
- Cultural Resources
- Traffic

In addition to comments received on the NOP, controversy exists as to whether the Proposed Project's subdivision is an appropriate action under the existing Williamson Act contract.

Interpretation 1

The subdivision is not appropriate because it would ultimately result in a residential subdivision, in violation of the Williamson Act. The Subdivision Map Act (Section 66474.4) requires that any jurisdiction must "deny approval of a tentative map [under a Williamson Act contract]...if it finds ...the subdivision will result in residential development not incidental to the commercial agricultural use of the land." This interpretation posits that the Project proposes residential uses that would not be incidental to the commercial agricultural use of the land. Under this interpretation, the ~~DEIR~~FEIR includes an alternative (Alternative 4: Consolidated Project Alternative) which would terminate the Williamson Act contract for nearly half of the project site.

Interpretation 2

The subdivision is appropriate because it is an agricultural subdivision in which residences would be incidental to the agricultural use. The subdivided land would continue to support grazing/cattle breeding activities. The Williamson Act contract would remain with the land and as such new residents of the Proposed Project would be required to abide by its provisions. As with the current owner, new lot owners can opt out of the Williamson Act contract if they choose, a process that either takes ten years or requires a cash payment equal to 12.5 percent of the assessed value of the property.

S.4 Issues to be Resolved by the Decision-Making Body

An EIR is an informational document intended to inform the public agency decision makers and the public of the significant effects of a project, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the Proposed Project. The lead agency (in this case the County) must respond to each significant effect identified in this EIR by making "Findings" for each significant effect. The issues to be resolved for the Proposed Project include whether or how to mitigate the associated significant effects, including whether to implement a project alternative, the determination of which is to be made by the decision makers.

As discussed in Section S.3, the Decision-Making Body must also decide whether or not the Proposed Project is consistent with Williamson Act requirements, or adopt another alternative provided in Chapter 4.

S.5 Project Alternatives

Four project alternatives were identified for further analysis in this [DEIR/FEIR](#). These additional alternatives are evaluated in Chapter 4 of this [DEIR/FEIR](#), where environmental effects are compared to those of the Proposed Project and are assessed relative to their ability to meet the basic objectives of the Proposed Project.

S.5.1 Alternative 1: No Development Alternative

The No Development Alternative (NDA) assumes that the Project site would continue in its current state over the long term and the Proposed Project would not be implemented. Grazing/cattle breeding would continue on the site with this alternative. There are potential effects to biological and cultural resources due to unrestricted cattle grazing, but there would be no other significant effects under this alternative. When compared to Proposed Project, the NDA reduces impacts to biology, cultural resources, and traffic. The NDA is discussed in detail in Section 4.2.

S.5.2 Alternative 2: No Project/Legal Lots Alternative

The No Project/Legal Lots Alternative (NPLL) assumes the Proposed Project would not to go forward. The four legal lots would be developed with single family residences. Lot owners could elect to continue with the existing Williamson Act contract, in which case the existing grazing/cattle breeding would continue, or some other agricultural use could be implemented. Significant biological and cultural resource effects would result due to the presence of cattle and construction of pads and roads required for each lot. When compared to the Proposed Project, these effects would be significantly reduced due to the limited scope of development. The NPLL is discussed in detail in Section 4.3.

S.5.3 Alternative 3: Reduced Project Alternative

The Reduced Project Alternative (RPA) proposes 14 residential lots, a 42 percent reduction from the Proposed Project. The residential lots would range in size from 58.55 to 234 acres. This alternative assumes a road network similar to the Proposed Project. The Williamson Act would remain in effect and cattle grazing/breeding would continue on the site. Significant biological, cultural resource, and traffic effects would occur. When compared to the Proposed Project, these effects would be reduced because the scope of the RPA is reduced by approximately 42 percent. This alternative would be environmentally superior to the Proposed Project, after the NPA. The RPA is discussed in detail in Section 4.4.

S.5.4 Alternative 4: Consolidated Project Alternative

The Consolidated Project Alternative (CPA) proposes a 34-lot design, focused in the east and north central parts of the site. The residential lots range in size from 11.8 to 709.4 acres. The development area for this alternative is [499.9194.9](#) acres. There would be [1,216.91,221.9](#) acres of open space provided. This alternative would require the property owners to file the non-renewal of the Williamson-Act contract over part of the site because lot sizes would be smaller than the 40-acre minimum required by the contract. A 709.4-acre lot would remain within the Williamson Act. Cattle grazing/breeding would continue on this lot, encompassing approximately 160 acres. The applicant would pursue disestablishment of the agricultural preserve per the procedures outlined in Board Policy I-38, "Agricultural Preserves." When compared to the Proposed Project, the CPA reduces impacts to biology, traffic, and agriculture, while

impacts to cultural resources would be similar. The CPA is discussed in detail in Section 4.5.

The Proposed Project and the above-described alternatives are compared in matrix format in Table S-2, "Comparison of Project Alternative Impacts to Significant Proposed Project Impacts."

S.6 List of Persons, Organizations, and Public Agencies that Commented on the Draft Environmental Impact Report (DEIR), Public Comments, and Responses to Comments

A draft version of this EIR was circulated for public review from 08/29/2013 to 10/14/2013. The following is a listing of the names and addresses of persons, organizations, and public agencies that commented during this public review period. They have been designated A through I for ease of reference. This listing is followed by the public comment letters themselves and the responses to those letters.

<u>LETTER DESIGNATION</u>	<u>NAME</u>	<u>ADDRESS</u>
<u>FEDERAL AGENCY</u>		
<u>A</u>	<u>U.S. Department of Agriculture, Forest Service</u>	<u>1634 Black Canyon Road Ramona, CA 92065-1205</u>
<u>STATE AGENCY</u>		
<u>B</u>	<u>Department of Fish and Wildlife</u>	<u>3883 Ruffin Road San Diego, CA 92123</u>
<u>C</u>	<u>Department of Transportation</u>	<u>4050 Taylor Street San Diego, CA 92110</u>
<u>D</u>	<u>Native American Heritage Commission</u>	<u>1550 Harbor Drive Sacramento, CA 95691</u>
<u>LOCAL AGENCIES</u>		
<u>E</u>	<u>Julian Planning Group</u>	<u>P.O. Box 249 Julian, CA 92036</u>

SPECIAL
INTEREST/ORGANIZATIONS

<u>F</u>	<u>San Diego County Archaeological Society, Inc.</u>	<u>PO Box 81106 San Diego, CA 92138-1106</u>
<u>G</u>	<u>Endangered Habitats League</u>	<u>8424 Santa Monica Blvd Suite A592 Los Angeles, CA 90069-4267</u>
<u>H</u>	<u>Conservation Biology Institute</u>	<u>651 Cornish Drive Encinitas, CA 92024</u>
<u>I (Late Comment)</u>	<u>Sierra Club</u>	<u>8304 Clairemont Mesa Blvd San Diego, CA 92111</u>
<u>INDIVIDUALS</u>	<u>No letters from individuals submitted</u>	

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File Code: 1560

Date: November 4, 2013

Dennis Campbell
Land Use and Environmental Planner
Planning and Development Services
5510 Overland Avenue, Suite 310
San Diego, CA 92123

A

To the County of San Diego:

Thank you for the opportunity to provide late comments on the Hosking's Ranch Draft Environmental Impact Report (DEIR) since the federal government shutdown impeded our ability to review of project documents. First of all, we would like to commend the quality and level of detail provided in this analysis and its supporting documents, which eliminated many of our common concerns about the impacts of adjacent development on the Cleveland National Forest.

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Our remaining concerns about the Hosking's Ranch Proposed Project result from the fact that it lies adjacent to our Proposed Upper San Diego River Recommended Wilderness Area, for which the Final Supplemental Environmental Impact Statement is about to be released. We found no mention of this designation in the Draft SEIR, though the County of San Diego was provided its location during the Forest Conservation Initiative General Plan Update process. We strive to maintain the area's wilderness character as comprised by five elements defined by the Wilderness Act: natural, undeveloped, untrammeled, opportunities for solitude or a primitive and unconfined type of recreation, and special features. The terrain and habitat of the San Diego River Gorge are among the special features of this area that warrant the highest level of protection the US Forest Service can designate.

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The Proposed Project's visual impacts would directly affect the area's wilderness character. Specifically, property development at the western end of the subdivision, particularly lots 23 and 24 of the Proposed Project, would reduce visitors' sense of solitude in the northern part of the San Diego River Gorge. Solitude, which in part encompasses freedom from external sights and sounds such as homes, is an important part of the area's wilderness character. In the Draft SEIR, the Proposed Project's visual impacts were not found to be significant, despite that the viewshed area map (Figure 3-1-14) encompasses lands Proposed as Recommended Wilderness; furthermore, no "Key View" evaluated visual impacts from this perspective. We call into question the significance determination and request further analysis, given unaddressed considerations of wilderness character. In addition, noises common to rural developments, such as chainsaws, lawn or brush mowers, and vehicles, would be likely to affect visitors' sense of solitude nearby the Proposed Project. One way to mitigate for both visual and auditory impacts to wilderness character would be to eliminate the two westernmost lots or relocate them to the eastern end of the subdivision, leaving the western end as open space.

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Based on experiences elsewhere on the Cleveland National Forest, the Proposed Project would also increase the potential for motorized and mechanized trespass on lands Proposed as Recommended Wilderness. Not only would this constitute illegal activity, it would also degrade wilderness character, impact vegetation and wildlife, and contribute to soil erosion and water quality impacts on the Cleveland National Forest. In this context, Cleveland National Forest staff would have little to no access to Forest lands adjacent to the proposed development, and so it would be difficult to either monitor or manage this use.

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The US Geological Survey topographical map for this area shows an existing road on Cleveland National Forest lands in the SE ¼ of the NW ¼ of Section 3 (T13S, R3E). Although it does not appear based on the project documents that this road is intended to provide access to the project area, it does access the northeast corner of Lot 24. Unless this road provides legal access based on existing easements to other landowners in the east half of Section 3, we would recommend that the road be decommissioned as part of the Proposed Project in order to mitigate for potential motorized access to the Proposed Recommended Wilderness. Otherwise, this road would be the most likely conduit for such activity.

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Grazing trespass is also a potential concern given that agricultural uses, in the form of existing County grazing permits, must continue for at least 10 years unless property owners choose to pay a substantial fee. New landowners without interest in grazing may inadvertently allow livestock to trespass on National Forest lands. One component of the Proposed Project suggests that “signage and/or fencing would be provided where necessary” to protect open space and habitat. We suggest that fencing should also be required where necessary to prevent both grazing and motorized trespass. In our considerable experience managing rangelands and livestock across Forest Service lands, we have found that few operations at these levels are economically viable. As a result, fencing and personnel are less affordable, which results in grazing trespass issues for neighboring landowners such as the Forest Service.

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While the Proposed Project’s Fire Hazard analysis and Fire Protection Plan are detailed and prudent, several additional factors are worthy of consideration. Increased development adjacent to the Cleveland National Forest not only increases the potential for wildfire to consume structures, it can also contribute new ignitions that may start wildfires on the National Forest. Both possibilities are made more likely in this area because the river canyon acts as a wind corridor that funnels winds from west to east or vice-versa, their prevailing directions. Moreover, fires in this area would be extremely difficult to suppress due to the lack of access cited above as well as the extremely rugged terrain of the San Diego River Gorge. These conditions place firefighters at risk, as demonstrated by the tragic deaths of 11 firefighters that died in the 1956 Inaja Fire in this area.

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Not only could such fires consume structures elsewhere, they could also exacerbate the current trend of overly frequent, human-caused fires in the Upper San Diego River watershed. This problem harms native ecosystems, the threatened California Gnatcatcher, and watershed function, all of which are core values of this part of the Cleveland National Forest and San Diego County. Finally, the management of fuels on the Cleveland National Forest that could be needed to protect this new development from wildland fire would require additional funds that are currently lacking and would negatively impact the wilderness character of the Proposed

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Recommended Wilderness. We agree with the inclusion of defensible space on private lands as a required feature of the Proposed Project. The potential mitigation measure of eliminating or relocating the westernmost lots would lessen the fire hazard associated with the development and could enable firefighter access to the rim of the San Diego River Gorge, which would otherwise be inaccessible.

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Finally, we are concerned about impacts to water resources since this project area affects two tributaries to the San Diego River, Temescal Creek and the unnamed creek just to the north of Daley Flat. According to the State Water Resources Control Board, these streams are fully appropriated. Increasing water use, including groundwater, impoundments, and diversions, is responsible for lowering flow conditions in natural watersheds on many National Forests in the nation including the Cleveland National Forest. One of our concerns is that the combination of an increase in long-term groundwater use associated with the Proposed Project, climate change, and drought conditions could lead to a decrease in in-stream flows. This could negatively affect the water rights users in that there would be less water available in an already fully appropriated stream.

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For example, there is a notable trend towards an increase in subdivisions and vineyards in Ramona contributing to cumulative impacts to local water resources. Our concern is that there could be a similar cumulative impact to local water resources downstream of this project.

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Since we are currently experiencing a multi-year drought, we are also concerned that new property owners would be inclined to impound water in Temescal Creek and the unnamed creek just to the north of Daley Flat, as we have seen in other areas of the Cleveland National Forest. If this scenario contributed to a decrease in in-stream flows, it could impact both the habitat for riparian and aquatic organisms and visitors seeking wilderness experiences in the San Diego River Gorge. Temescal Creek in particular contains a waterfall on the Cleveland National Forest that rivals Cedar Creek Falls in size and scenic quality. Though no trail serves this falls, a well-known cross-country route does, and a reduction in water flowing over this falls would impact both visitors and this special wilderness feature.

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We appreciate the opportunity to work together with the County of San Diego to minimize the impacts of adjacent development on the Cleveland National Forest. Please let us know if we can assist you with further information to help you conduct this analysis by contacting Jeff Heys, Forest Planner, at (858) 674-2959 or jaheys@fs.fed.us.

Sincerely,

/s/Joan Friedlander
JOAN FRIEDLANDER
District Ranger

Hoskings Ranch: Draft Response to Comments

August 10, 2014

Letter A: U.S. Department of Agriculture, Forest Service

1. The County appreciates the comment. Comment noted.
2. The proposed Sand Diego River Recommended Wilderness Area (SDRWA) is located north and west of the Proposed Project site. Distance varies from adjacency to approximately on 200 feet on the west and north. A discussion of potential impacts to the SDRWA is provided below in response to comment A-3
3. The County disagrees that the Proposed Project would “directly affect the area’s wilderness character” as stated in the comment. Figure A, “SDRWA in Relation to the Project,” shows the relationship of the SDRWA to the Proposed Project. The SDRWA is classified into wilderness areas and scenic areas,, as indicated on the map. It is not clear from the comment where trails or other viewing points would be located in the SDRWA. This response therefore refers to these two general designations. The nearest SDRWA scenic area is approximately 800 feet from the pad on Lot 24 and the nearest wilderness area is 4,270 from the pad. The SDRWA scenic area is approximately 1,200 feet from the pad on Lot 23 and the wilderness area is approximately 4,600 feet from the pad. A cross section has been provided from the SDRWA scenic area to Lot 24 and is provided in Figure B, “Lot 24 Cross Section.” At this distance a house on the proposed pad would present a narrow profile. The angle of view would expose only the northern face of the residence. The cross section also shows that intervening vegetation would screen this western view. The residence would appear to be similar to existing houses in the area that are adjacent to the SDRWA. These scattered residences are an established feature of the area and as such the Proposed Project’s lots would not be at odds with existing community character.

Proposed Lots 23 and 24 are large lots, consisting of 84.78 and 155.62 acres respectively. Approximately 78 and 148 acres of open space will be dedicated on these lots, respectively. Single residences surrounded by an expanse of open space are common in the area, so the residences on these lots will not be out of keeping with character of views already available from the SDRWA. In addition the entire western boundary of the Proposed Project site is proposed to be open space, with the possibility of limited and controlled grazing, which is also a common feature in the region. Therefore, the viewshed of the SDRWA would not be impacted by the Proposed Project.

In summary, the view from SDRWA of Lots 23 and 24 are distant and obstructed and would be consistent with existing views in the area. Opportunities for a

wilderness experience are not impeded by location of two widely spaced lots surrounded by open space. Therefore, the SDRWA would not be significantly impacted by the Proposed Project. No change to the EIR is required as a result of the comment.

4. The County disagrees that the westernmost lots should be eliminated or relocated due to potential noise impacts from the Proposed Project. The EIR included an analysis of noise impacts in Section 3.1.8, including a Noise Study as Appendix P. A comprehensive range of effects were evaluated which include noise sensitive land uses and project-generated airborne noise (i.e. construction, non-construction and impulsive noise). It was determined that the Proposed Project would not result in significant noise impacts because noise levels do not exceed the County's noise standards and project-related operations are anticipated to comply with the County's Noise Ordinance. No impacts are anticipated and no mitigation is required.

Furthermore, the relationship of the SDRWA to Lots 23 and 24 is shown in Figure A. The nearest SDRWA scenic area is approximately 800 feet from the pad on Lot 24 and the nearest wilderness area is 4,270 from the pad. The proposed pads on Lot 23 and 24 are surrounded by open space. Therefore, the SDRWA would not be significantly impacted by the Proposed Project. No change to the EIR is required as a result of the comment.

5. The Proposed Project would dedicate 1,209.8 acres of protected open space. The entire western part of the site, adjacent to the lands proposed as recommended wilderness, will be included in this open space area. No residences will be located within 800 feet of the SDRWA boundary. The western most residences are surrounded by open space and no intrusions into it will be permitted. The exception to access will be for the open space maintenance and monitoring of grazing activity. This activity will be focused on the monitoring grazing activity and evaluating habitat status and the integrity of open space. Any discovery of "motorized or mechanized trespass" would be reported and remediated. The Proposed Project will therefore discourage rather than encourage intrusions in to the SDRWA because an open space buffer will be created, homes will be isolated from the SDRWA, and monitoring of open space and grazing will provide oversight and correction of any violations of the integrity of open space areas.
6. Any rights the Forest Service currently has under law as related to access to forest lands would not be affected by approval of the Proposed Project. The Proposed Project will not inhibit the ability of the Forest Service to monitor forest resources because no change to existing legal access rights are proposed, and the reports of ongoing monitoring to be instituted as a result of the Proposed Project will be shared with the Forest Service. Please see response to comment A-5.

7. The road noted in the comment is not proposed to be developed as part of the Proposed Project. The road is designed to serve two existing legal lots offsite to the west, therefore it would be infeasible to decommission the road as requested in the comment. Use of the road will be restricted to agricultural activity and monitoring activities, as discussed in response to comment A-5. However, to ensure access is strictly controlled, the Proposed Project's Resource Management Plan and the Grazing Management Plan will be amended to specify that the road will be gated and locked at its location near Lot 24. Additionally, the County disagrees that the grazing trespass onto adjacent wilderness lands would occur because the project will (1) prevent trespass with gates or topography restrictions, (2) grazing will be monitored with the extensive monitoring plan and (3) limit access by gating any road connections.
8. Monitoring, reporting, and remediation are required as part of the plans prepared for the Proposed Project, as discussed in response to comment A-5. To further protect resources, the recommended fencing and gating will be used at the entry to the unimproved road that links Lot 24 and the western boundary of the site. The Resource Management Plan and the Grazing Management Plan will be amended to reflect requirement.
9. The comment states there is a wildland fire risk that currently exist in the area of the Proposed Project. The EIR and Fire Protection Plan (FPP) address the increased risk of wildfires from the National Forest, as well as the risk that the Proposed Project could introduce new fires into the area. See DEIR Section 3.1.6, second paragraph, page 3-39, and section 3.1.6.1 on that page indicate the study takes into account the possibility of wildfires in the area. The BehavePlus computer program, (page 12 of the report in Appendix L) sanctioned by the U.S. Forest Service, was used to calculate the fire risk from wildfires. An extensive range of fire safety measures are specified in sections 4.3 and 4.7 to enhance the safety of the residences and minimize the risk of fire. These include water tanks on the site that will be available to fight fires.
10. The County disagrees that the westernmost lots should be eliminated or relocated due to potential fire hazard impacts from the Proposed Project. Each lot has been designed to provide fire safe features, including clearing around structures, irrigated zones, and a 10,000 gallon water tank on each lot for backup fire protection uses. As such elimination of the western most lots will not contribute to a specific improvement in fire safety. Furthermore, the Proposed Project would not restrict or prohibit firefighter access to the rim of the San Diego River Gorge. This access is currently available off-site via Hoskings Ranch Road and it will not be affected by the project. The existing onsite dirt road from proposed lot 24 to the west and south will not be disturbed by the project. A gate and fence will be constructed at the entry to this road near lot 24 to discourage unauthorized intrusions onto open space. It will be fitted with an automatic

opening system that can be activated by the fire department in the event of an emergency. This information was added to the DEIR on page 3-57.

11. The County acknowledges the comment. Water rights are an issue beyond the scope of the DEIR. The Proposed Project would not have water quality impacts because runoff would be controlled in accordance with drainage and stormwater plans that incorporate hydromodification requirements designed to prevent the release of polluted water from developed areas. Please see the DEIR Section 3.1.7, Surface Water Resources, and Appendices M-O. No change to the EIR is required as a result of the comment.

12. Both Temescal Creek along its entire length that borders the site, and the unnamed water course near Daley Flat will be protected in open space that includes a 200 foot buffer and the use of appropriate signage and fencing. No wells will be permitted in or near the creek or water course. Four existing onsite impoundments may continue to be used for cattle but these have existed on the site for many years. No increase in impoundments is proposed.

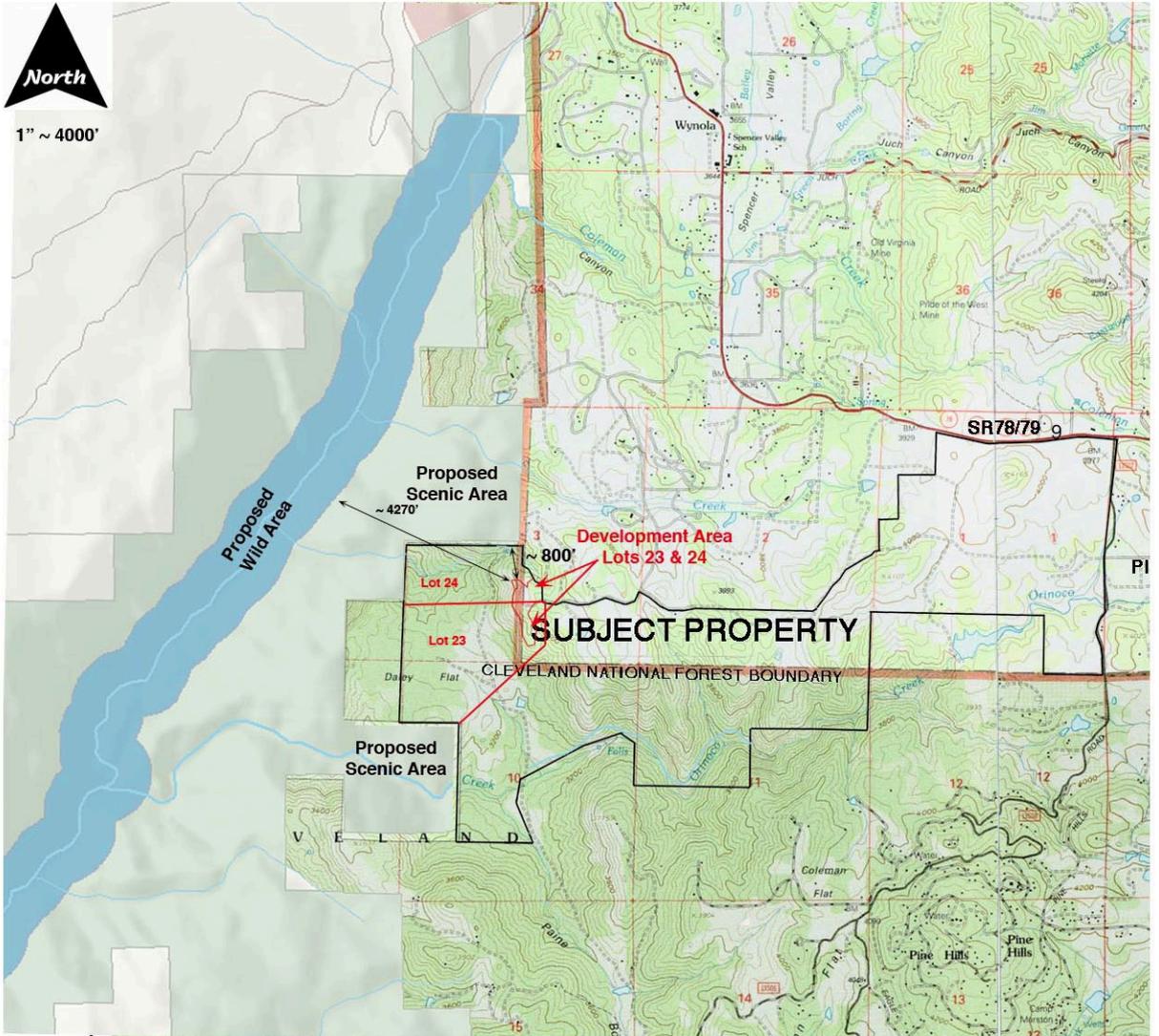
A groundwater assessment entitled *Final Hydrogeologic Investigation*, April 2012 was completed for the Proposed Project and included as Appendix K of the EIR. Groundwater recharge and impacts due to the drought were included in the groundwater analysis. The global climate change analysis also includes water conservation measures. Using the General Plan build out as a worse case, the study concluded there were ample water resources in the watershed to accommodate the Proposed Project without impacting available water resources. Additionally, individual wells will use water from deep aquifers from which the streams are not dependent.

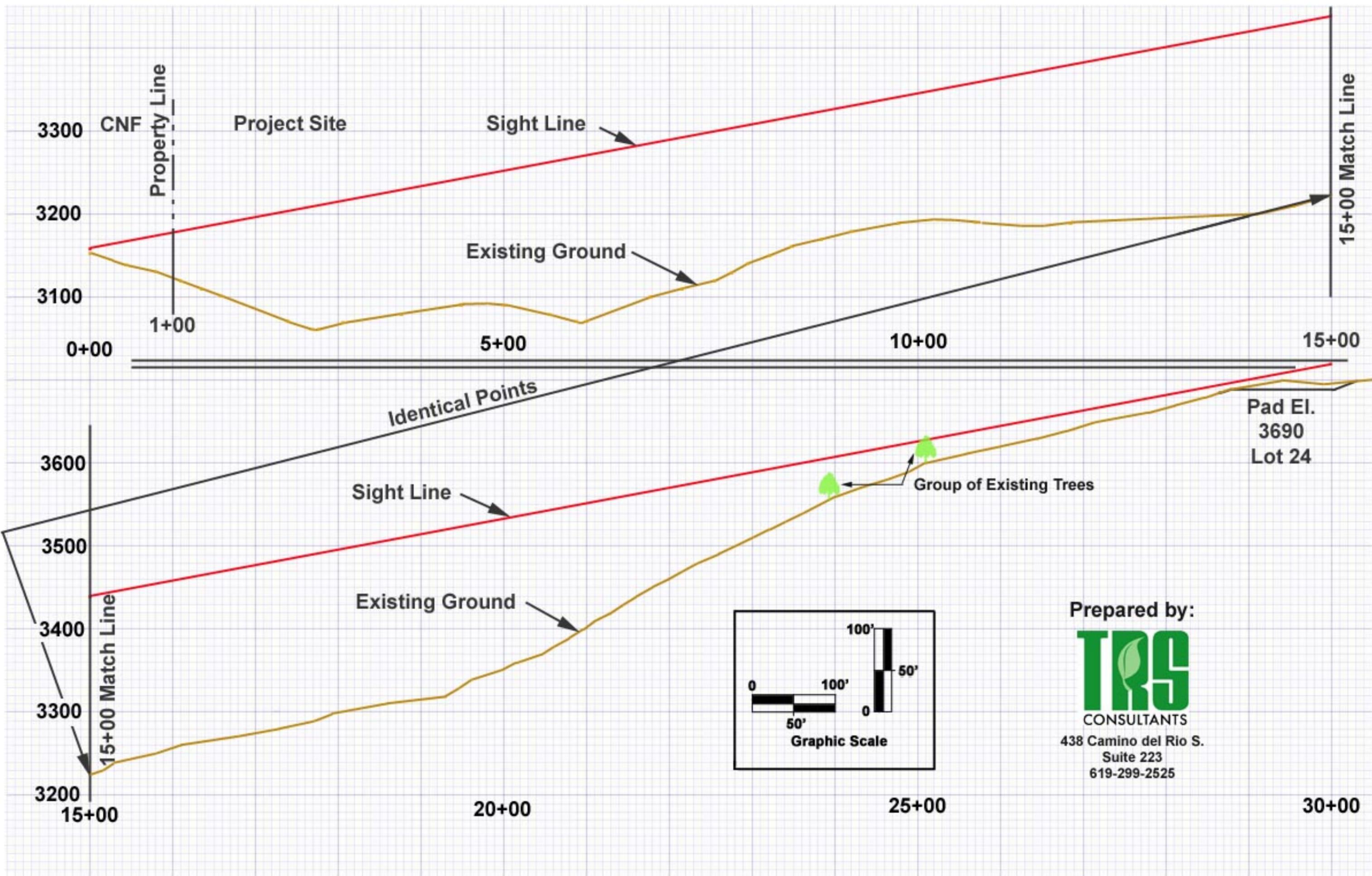
13. The County acknowledges the comment. Because the technical study for the Proposed Project concluded that onsite wells will not negatively impact the watershed, and because stream flows will not be impacted by the Proposed Project, downstream water rights will not be impacted. No change to the EIR is required as a result of the comment.

14. The general situation in Ramona cited in the comment involves "subdivisions" of unspecified sizes and density with vineyards. While no specific example is cited, subdivision lot sizes in the vicinity of Ramona area are generally SR-1 to SR-10, or 1 dwelling unit per one to ten acres. The Proposed Project includes lots of 40 acres or more, with no vineyards proposed. Therefore, the situations are not comparable. No change to the EIR is required as a result of the comment.

15. Please see response to comment A-12. The County would like to note no water use in or near Temescal Creek will be permitted as part of the groundwater demand for the Proposed Project.

16. The County appreciates the comment. Please see Comment 12 for a full response. No water use in or near Temescal Creek will be permitted. No change to the EIR is required as a result of the comment.





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EDMUND G. BROWN JR., Governor
 CHARLTON H. BONHAM, Director



October 9, 2013

Mr. Dennis Campbell, Project Manager
 County of San Diego, Planning and Development Services
 5510 Overland Avenue, Suite 110
 San Diego, CA 92123

Subject: Comments on the Draft Environmental Impact Report (EIR) and Draft Habitat Loss Permit (HLP) Findings for the Hosking's Ranch Project (SCH#2003081154)

B

Dear Mr. Campbell:

The California Department of Fish and Wildlife (Department) has reviewed the draft Environmental Impact Report (dEIR) and draft Habitat Loss Permit (HLP) findings for the above referenced project, dated August 29, 2013. The project was previously brought to a monthly County "batching" meeting, which is a forum to address projects requiring HLPs, and the Department previously provided comments on the draft Hosking's Ranch Conservation Grazing Management Plan (CGMP) in a letter dated February 21, 2013. The comments provided herein are based on the information provided in the dEIR and HLP, including their associated documents [e.g. Biological Resources Survey Report and draft Resource Management Plan (prepared by Vincent N. Sheidt, August 2013)], site visits in April and July of 2012, the aforementioned batching meeting, our knowledge of sensitive and declining vegetative communities, and our participation in regional conservation planning efforts.

1

The following statements and comments have been prepared pursuant to the Department's authority as Trustee Agency with jurisdiction over natural resources affected by the project (California Environmental Quality Act [CEQA] Guidelines §15386) and pursuant to our authority as a Responsible Agency under CEQA Guidelines Section 15381 over those aspects of the proposed project that come under the purview of the California Endangered Species Act (Fish and Game Code §2050 et seq.), Fish and Game Code Section 1600 et seq., and other sections of the Fish and Game Code. The Department also administers the Natural Community Conservation Planning (NCCP) program (DFG Code Section 2800, et seq.). The County of San Diego (County) participates in the NCCP program by implementing its approved South County Multiple Species Conservation Program (MSCP) Subarea Plan (SAP). The County of San Diego (County) also has signed a Planning Agreement with the Department and the U.S. Fish and Wildlife Service (jointly, the Wildlife Agencies) for the development of the East County Multiple Species Conservation Program Subregional Plan (ECMSCP), which would be a joint NCCP/HCP addressing development of unincorporated lands in east San Diego County.

The project involves the subdivision of the 1,416.8-acre Hosking's Ranch property, which is located south of State Route 78/79 (SR78/79), west of Pine Hills Road, and south of Orinoco Drive, near the community of Julian in unincorporated San Diego County. The Proposed Project has an approximate 207-acre development footprint, and would divide the property into 24 parcels, ranging in size from 40 to 196 acres each for eventual construction of single family homes, with portions of each lot proposed for agricultural use (and remaining under the existing Williamson Act contract). The dEIR also identifies a Consolidated Project alternative which would result in 34 new single family lots and require the applicant to file a notice of non-renewal

Conserving California's Wildlife Since 1870

of the Williamson Act Contract for a portion of the site. The Consolidated Project alternative would result in an approximately 7.4-acre decrease in development footprint compared to the Proposed Project. Our review of the habitat evaluation maps of the County's draft ECMSCP indicates that Hosking's Ranch is located in the central mountains ecoregion of the east county within a proposed Focused Conservation Area. Habitats on and adjacent to the project site range from "moderate" to "very high" habitat quality, and are considered important to future regional preserve design. The site also contains populations of a state-listed (endangered) plant, the Parish's meadowfoam (*Limnanthes gracilis ssp. parishii*).

1

The Department offers the following comments and recommendations to assist the County in avoiding, minimizing and adequately mitigating the project-related impacts to biological resources, and to ensure that the project is consistent with the County's HLP process, federal and state endangered species regulations, and would not adversely affect ongoing regional habitat conservation planning efforts.

1. The Department recommends that if development is to occur on this property, a scenario be provided where the on-site open space/mitigation is provided in the largest contiguous blocks possible rather than through multiple smaller back yard open space lots. Smaller conserved areas inherently have increased edge effects and often present management problems. Of the alternatives identified in the dEIR, the Consolidated Project Alternative Design (34-lot) most closely meets this recommendation because it would provide a single contiguous/connected open space lot and presumably will be more efficient to manage compared to the proposed project. However, we recommend that a 24-lot alternative with one or two large contiguous open space lots also be evaluated and considered by the County as part of the environmental review and permitting process.
2. The Department remains concerned with the potential for cattle grazing to have a negative effect on biological resources in areas being used as mitigation for proposed impacts. Any conserved acreage that cattle will still have access to that contains habitat types adversely affected by grazing (see Table 3 of the CGMP) should not be counted towards meeting the project's mitigation obligations. Areas/habitat types in which grazing has a neutral/beneficial effect may be used as mitigation, provided that if monitoring reveals a negative impact, cattle will be removed from the area if no other workable solutions are identified to ensure biological values are maintained.
3. Although the Biological Resources Survey Report includes a conceptual resource management plan (RMP), a final site-specific RMP should be developed and implemented for the proposed on- and off-site mitigation areas as a condition of HLP approval to ensure the long-term conservation of the mitigation sites. The RMP should include biological goals, management objectives, specific tasks, and funding assurances to achieve the objectives. More specifically, the RMP should contain provisions to monitor populations of sensitive and/or listed species, control invasive plants, provide for adequate fencing, limit public access, and address any other relevant land/species management issues. Regarding cattle grazing, the RMP should include specific, measurable monitoring criteria (e.g. percent dry matter, target non-native and native cover components, etc.) that can be used to determine how the cattle are affecting the various habitat types as well as identify potential "triggers" for altering a given grazing regime if monitoring reveals a negative effect. The RMP for the on- and

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off-site mitigation lands would require approval by the Wildlife Agencies as part of the County's HLP process.

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4. The Lot by Lot Analysis of Agricultural Capacity (Appendix G) for the proposed project contemplates agricultural activities beyond grazing. Any acreage on the project site that may be subject to other types of agriculture should be accounted for as impacted and require mitigation. The open space easement being dedicated to the County as mitigation for the proposed project should prohibit any agricultural activity other than grazing performed in accordance with the approved grazing management plan.

5

5. The proposed fencing design included in Attachment F of the Biological Resources Survey Report and draft HLP Findings (page 19) appears to be inconsistent with that being proposed in the CGMP (page 15). The Department suggests that the design proposed in the CGMP be implemented as it is consistent with our earlier comments (see February 21, 2013 draft CGMP letter) on fencing design.

6

6. The draft EIR and supporting documents (e.g., Tables 1 and 11 of biology report) do not address potential for impacts to the federally listed endangered and state-listed threatened Stephens' kangaroo rat (*Dipodomys stephensi*; SKR). However, Table 9 (Observed Species List - Fauna) of the biology report does have an entry "*Dipodomys* sp. Kangaroo Rat." Our review of the habitat evaluation maps of the County's draft ECMSCP indicates that the site has potential for SKR and other grassland species. We recommend that an updated habitat assessment and, if warranted, protocol surveys for SKR be conducted in all areas of suitable habitat that may be impacted by the project. We recommend that the results of these surveys be included in the final EIR and supporting documents. If it is determined that the area is occupied by SKR, measures to avoid, minimize, and offset project related impacts should be identified. In addition, a state CESA authorization/permit would be required for impacts to this species.

7

7. The draft EIR and Biological Resource Survey Report acknowledge the presence of Parish's meadowfoam on the project site. If the project, project construction, or any project-related activity during the life of the proposed project may result in take of this species (e.g. changes in hydrology, direct impact), the Department recommends that the project proponent seek appropriate take authorization under CESA prior to implementing the project. Early consultation is encouraged, as significant modification to a project and mitigation measures may be required in order to obtain a CESA permit.

8

8. Page 16 of the biology report indicates that several directed field surveys and habitat evaluations were conducted in conjunction with the biological study of the property. The biology report (Table 1; Field Surveys) indicates that on-site work included presence/absence surveys for the federally endangered arroyo southwestern toad (*Anaxyrus californicus*; arroyo toad) in 2008 and for the federally endangered Quino checkerspot butterfly (*Euphydryas editha quino*; QCB) in 2009. A wetland survey (including an updated RPO wetland study) was performed in 2010. Other surveys included habitat evaluations for various special status species known from the vicinity, a spring rare plant survey in 2008, and a general baseline biology update was conducted in 2010. Since the last field work was conducted over three years ago, we recommend that the results of the biological surveys be verified to accurately represent current conditions on-site. In addition, page 19 of the biology report indicates that there are

9

small patches of *P. erecta*, *O. purpurascens*, and other QCB larval hosts (members of the Scrophularaceae family) present on-site, and the property is located within the U.S. Fish and Wildlife Service recommended survey area for QCB. Due to the surveys being over four years old, we recommend that updated surveys for QCB be conducted and the results included in the final EIR and biological report.

9

9. Page 27 of the biology report indicates that twenty-seven species of special status animals were observed on the project site during the field survey, including several avian/raptor species such as the golden eagle (*Aquila chrysaetos*), red-shouldered hawk (*Buteo lineatus*), the state threatened Swainson's hawk (*Buteo swainsoni*), northern harrier (*Circus cyaneus*), white-tailed kite (*Elanus leucurus*), horned lark (*Eremophila alpestris*), and barn owl (*Tyto alba*). In order to avoid impacts to nesting birds, the dEIR should require that clearing of vegetation, and project construction if/when biologically warranted, occur outside of the peak avian breeding season which generally runs from February 1 through September 1 (as early as January for some raptors). If project construction is necessary during the bird breeding season a qualified biologist with experience in conducting bird breeding surveys should conduct weekly bird surveys for nesting birds, within three days prior to the work in the area, and ensure no nesting birds in the project area would be impacted by the project. If an active nest is identified, a buffer should be established between the construction activities and the nest so that nesting activities are not interrupted. Where feasible, we generally recommend a buffer be a minimum width of 300 feet (500 feet for raptors), delineated by temporary fencing, and remain in effect as long as construction is occurring or until the nest is no longer active. No project construction should occur within the fenced nest zone until the young have fledged, are no longer being fed by the parents, have left the nest, and will no longer be impacted by the project. Alterations in the nest buffer distance may be appropriate depending on the avian species involved, ambient levels of human activity, screening vegetation, or possibly other factors, in which case a site-specific nest protection plan should be developed. The Plan should include detailed methodologies and definitions to enable a qualified avian biologist to monitor and implement nest-specific buffers based upon the life history of the individual species; species sensitivity to noise, vibration, and general disturbance; individual bird behavior; current site conditions (screening vegetation, topography, etc.); ambient levels of human activity; the various project-related activities necessary to construct the project; and other features.

10

10. Page 33 of the biology report notes that a single southwestern pond turtle was observed in Temescal Canyon Creek near the southwestern corner of the property. The observation is noteworthy because this is a very important species for regional conservation planning in San Diego County. Measures to avoid direct and indirect impacts to this species should be provided in the final EIR, and measures to manage/monitor for this species should be included in the final RMP for the property.

11

11. Based on review of the dEIR and supporting biological information, we recommend that the following species be evaluated for suitable habitat and potential presence on-site and included in the final EIR and supporting biological information [e.g., Table 11 (Potential Sensitive Species - Flora) and Table 12 (Potential Sensitive Species - Fauna)]. We recognize that there may be low to moderate potential for occurrence on-

12

site, but there may be suitable habitat and these are important species which are proposed to be covered under the ECMSCP:

- a. Laguna Mountains skipper (*Pyrgus ruralis lagunae*): Page 36 of the biology report discusses the federally endangered Laguna Mountains skipper and notes that some larval host plants occur on-site but that none were observed during the 2009 protocol surveys conducted for QCB. Please note that the flight periods for these two species may not have overlapped in 2009.
- b. Hermes copper butterfly (*Lycaena hermes*): Table 8 of the biology report notes the presence of spiny redberry and Table 11 indicates a moderate potential to occur on-site.
- c. Large-blotched salamander (*Ensatina eschscholtzii klauberi*). CNDDDB has reported occurrences of this federal and state species of special concern immediately north and adjacent to the site.

12. To demonstrate that the project would not adversely affect the anticipated preserve design, important populations of proposed covered species (particularly for grassland-associated species) for the ECMSCP, or otherwise preclude completion of the ECMSCP, an assessment of suitable habitat and the potential for presence of all applicable ECMSCP species that are proposed for coverage should be incorporated into the final EIR. The project alternatives should also consider potential constrictions/impacts to wildlife connections and linkages. The assessment should provide some context of proposed changes to habitat and species in light of the relatively recent fires that occurred in the area.

The Department appreciates the opportunity to comment on the draft EIR and HLP findings. If you have any questions regarding this letter, please contact Kyle Dutro at (858) 467-4267 or kyle.dutro@wildlife.ca.gov.

Sincerely,



 Gail K. Sevens
Environmental Program Manager
South Coast Region

Hoskings Ranch: Draft Response to Comments

August 10, 2014

Letter B: California Department of Fish and Wildlife

1. The County concurs with the comment. The comment reviews California Department of Fish and Wildlife's (CDFW) history with the Proposed Project, its agency responsibilities, and general project details. No changes to the EIR are required in response to the comment.
2. The County concurs that open space should be provided in the largest contiguous blocks possible. Proposed Project lots were designed with a minimum area of 40 acres to be consistent with the existing Williamson Act Contract. While individual lots will support open space, this open space will be combined and managed within one 1,214.8-acre open space easement. The existence of open space and the restrictions pertaining to its use will be made clear to prospective lot buyers through notifications to buyers that will be required by the California Department of Real Estate as a Proposed Project condition. Protections will include fencing and signage as required by M-BI1 and M-BI-2. The Proposed Project includes two enforcement mechanisms through which open space will be protected. The Resource Management Plan (RMP) provides for monitoring, remediation, reporting, and funding for open space area management. The Conservation Grazing Management Plan (CGMP) will monitor open space integrity, the maintenance of fencing, and other habitat protections such as modulation of grazing in response to on-going impact analysis. The protective easement and extensive caretaking mandated for the Proposed Project will provide adequate protections for open space areas as a single connected and integrated area. The open space easement has been designed with this unified concept in mind. It encompasses a block of habitat that extends the length of the southern and western property lines. This large area will encompass all of Temescal Creek, Daley Flat, and the hillsides on the western boundary that ultimately descend to the San Diego River. Additionally large on-site drainages and sensitive habitats in the eastern parts of the site are protected as well so that connectivity is provided wherever possible. A minimum of 400 feet of separation has been maintained between development areas that extend north to south from the main project road so that habitat movement is not restricted or blocked. Open space boundaries have been shaped to follow topography to avoid discontinuities that may impede wildlife movement. A 24-lot alternative with one open space lot would not significantly improve connection and contiguity of open space design or efficiency of management because these features are already built into the Proposed Project design. The 34-lot alternative provides a large single lot of 709 acres, as noted, and provides 1221.9 acres of biological open space in total. This area will be created from areas of open space on each lot, as

with the Proposed Project. Open space will also be subject to a protective easement and the other protections noted above.

3. The County concurs with the comment. The CGMP will provide monitoring of grazing activity and on-going protection for sensitive habitats. The CGMP calls for removal of cattle if negative effects are found in grazed areas. A methodology for the assessment of impacts is also spelled out. Habitats outlined in Table 3 of the CGMP that are negatively affected by grazing and to which cattle will have access have not been counted toward mitigation. The CGMP will control vegetation impacts because patrols will monitor grazing effects in key areas. Grazing will be curtailed when negative effects are found. Many of the sensitive habitats such as wetland along creeks and key water courses will be fenced. Others are located in steep slope areas where grazing will be unlikely to occur.
4. The County concurs with the comment. A final Resource Management Plan (RMP) will be developed and implemented for all on- and off-site mitigation areas during the HLP permitting process. The plan will include the factors noted in the comment. Specifically, biological goals, management objectives, specific work tasks, and funding sources will be identified. Specific tasks to be included are habitat monitoring, control of invasive plants, fencing, and signage installation and maintenance. Specific methodologies for determining effects of cattle grazing will be included and will be mirrored in the CGMP. Wildlife Agency approvals of the HLP, final RMP, and final CGMP will be required prior to the Proposed Project obtaining a grading permit.
5. The County concurs with the comment. No agriculture other than cattle grazing/breeding is proposed in the open space areas of the site. Agricultural activities beyond grazing were discussed in the Lot by Lot Analysis as a way to show that lot owners would have realistic options if they chose to initiate agriculture in their development areas. These are not proposed and only cattle grazing/breeding will be allowed in the open space.
6. The County concurs with the comment. The fencing plan proposed in the CGMP will be the fencing plan implemented. A modification to that design will be implemented to add further protections to the western open space area, as discussed in Comment A-7. Specifically, the entrance to the traveled way that arcs from lot 24 toward the west and south will be gated and fencing will be added to prevent unauthorized intrusions. Access for the fire services will be maintained through a Knox Box or similar device. This change is reflected in the fencing plan in the CGMP, in Attachment B, and on the DEIR graphic (Figure 2-1-5)
7. The County concurs with this comment. A field survey has been completed by a permitted biologist (Stephen Montgomery). It included a two phased approach,

with a protocol habitat evaluation conducted as a first phase on May 7, 8, and 9, 2014 followed by limited trapping to identify species. The field survey report, found at Attachment H of Appendix A, found the general habitat conditions on the Hoskings Ranch to be sub-optimal for the endangered Stephens' kangaroo rat.

8. The County concurs with the comment. All areas where the Cuyamaca (Parish's) Meadowfoam occur on the site have been placed in managed, fenced biological open space. The locations of the plant are indicated on Figure 2-1-5 of the DEIR. Take authorization is therefore not required and no changes to the DEIR are required as a result of the comment.
9. The results of baseline biological field surveys have been verified by the Proposed Project biologist during updated field visits on January 3, 2014 and May 7, 2014. The field visits verified that the protocol surveys previously conducted are still be valid for the site based on a lack of changes observed in the May 7 survey. This included the Arroyo Toad, which was not found in previous surveys. No evidence of the toad was found in the surveys conducted in May 2014. No changes to the DEIR are required as a result of the comment. An updated assessment of the presence of the Arroyo Toad was also undertaken. No evidence of the toad was found. The comment also recommends an updated Quino Checkerspot Butterfly (QCB) survey be conducted. The County determined that the updated QCB survey was not necessary because the issue was discussed in the "batching" meeting of January 16, 2014 where it was concluded that new QCB surveys were not warranted if the site had not substantially changed or there were no other changes in circumstances. A site survey in May 2014 determined that site conditions had not changed.
10. The County concurs with the comment. This requirement is included in the DEIR as M-BI-3. The detailed methodology spelled out in the comment will be used if Proposed Project construction is necessary during the bird breeding season (February 1 through September 1). The methodology will be incorporated into the project as a condition, the text of which is in Section 2.1.5.3, Mitigation Measure M-BI-3, page 2-29.
11. The County acknowledges the comment. The Southwestern pond turtle was found offsite in Temescal Creek. It occurred adjacent to an area that is proposed for biological open space. The entire stretch of Temescal Creek on the site will be protected in open space. This will include a minimum 200 foot buffer along the creek, and fencing and signage to prevent human and cattle encroachment. The onsite pond turtle habitat will therefore be protected by the project's design. All onsite areas will be monitored as part of the RMP. As such the pond turtle will be included in the monitoring program and no separate measures are required. However, to ensure it is not overlooked, specific mention of the Southwestern pond turtle will be included in the RMP monitoring protocols. No changes to the DEIR are required as a result of the comment.

12. The County concurs with this comment. No changes to the EIR are required in response to the comment, although the project biological resources technical report will be modified to include more detail on the following:

Some larval host plants of the Laguna Mountains Skipper were found on the site in 2009, as noted in the comment. January 3, 2014 and May 7, 2014 field visits determined that the specific configuration of host plant species suitable to the Laguna Mountain Skipper was not present. Laguna Mountains Skipper appear to require more than one type of host plant species. Only one host plant for this species was observed in low numbers. Therefore no additional or directed surveys for this butterfly are required.

13. The County acknowledges the comment. Table 11 of the biology report notes a moderate potential for the Hermes Copper Butterfly to occur onsite, as noted in the comment. This determination is based on the reported presence of the Hermes Copper Butterfly larval host plant species (*Rhamnus crocea*). The recent field visits could not locate this species on the project site, although it is a shrub that would be visible if present. Three other species of *Rhamnus* (*R. californica* var. *californica*, *R. ilicifolia*, and *R. pilosa*) are present onsite. The reports of *R. crocea* were imported from studies conducted by others in 2002-2003. It now appears that this might have been a misidentification, based on the 2014 fieldwork. Therefore, no additional surveys for this butterfly are required.

14. The County acknowledges the comment. The comment notes that the Large-blotched Salamander has been reported to occur adjacent to the site. The project site is acknowledged as being "occupied" by this rare species because the recent field visits determined that it is very likely this species occurs in association with wooded areas of the property. Specimens live in relatively cool, moist places beneath or within decaying logs or under rocks, becoming active on the surface during wet nights when air temperatures are moderate. During dry periods, they remain underground and become inactive during severe winter cold weather. It is anticipated that specimens would be found in association with wooded areas, with downfall, and rock outcrops adjoining wooded areas. If the Large-blotched Salamander was to occur on the property, less than 13 percent of woodland will be impacted with either project design, leaving the remaining woodland protected in open space.. The species will be included in the list of species to be monitored during site visits that will occur under the Resource Management Plan (RMP) to ensure its habitats are not unduly impacted. Therefore no additional surveys of this species are required.

15. The County acknowledges the comment. The East County Multiple Species Conservation Plan (ECMSCP) is currently in the early stages of planning. A draft species list has been developed and is included in Appendix A of the DEIR, which addressed all of the species proposed covered species in the ECMSCP. The biology report for the project (Tables 10 and 11) provides a complete list of species that were assessed for the project. It includes all species proposed to be covered in the ECMSCP. Additionally the draft list has been reviewed by the consulting biologist and it was determined that there are no unanticipated impacts to these species as a result of the project. No changes to the DEIR are required as a result of the comment.

16. The County acknowledges the comment. Alternatives have evaluated biological impacts. Both the proposed project, the Reduced Project Alternative (RPA), and the Consolidated Project Alternative (CPA) maintain wildlife connections and linkages. Temescal Creek and Orinoco Creek have been identified as key linkages in the area and the entire lengths of the creeks are protected in open space with a minimum buffer of 200 feet. Fencing and signage are employed to keep intrusions into the area to a minimum. Grazing is excluded from this area. Offsite connectivity is also preserved. The western boundary is adjacent to Forest Service Land and is included as open space. Major north/south drainages are also preserved in open space. The CPA and the RPA preserve connections and linkages, as requested in the comment, and no changes to the DEIR are warranted. Field surveys have been conducted before and after major fires moved through this area, so the field work encompasses the change in species mix that may have occurred as a result of the fires.

DEPARTMENT OF TRANSPORTATION

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October 16, 2013

11-SD-78
PM 56.6
Hoskings Ranch DEIR

Mr. Dennis Campbell
County of San Diego
Department of Planning and Land Use
5510 Overland Avenue, Suite 110
San Diego, CA 92123

Dear Mr. Campbell:

The California Department of Transportation (Caltrans) has reviewed the Draft Environmental Impact Report (DEIR) for the proposed Hoskings Ranch Residential project (SCH#2003081154) located near State Route 78/State Route 79 (SR-78/SR-79). Caltrans has the following comments:

C

- All engineering analysis regarding the State Highway System including but not limited to corner and stopping sight distances analysis must be evaluated in accordance with current Caltrans Highway Design Manual (HDM). If sight distance(s) are found not to meet current Caltrans design standards, they will need to be brought up to current standards as part of the mitigation requirements. 1
- Per Topic 405-Intersection Design Standards of the Caltrans Highway Design Manual 2012 (HDM), "Set back for the driver of the vehicles on the crossroad shall be a minimum of 10 feet plus the shoulder width of the major road but not less than 15 feet". Therefore, Figure 5-1 Minor Road Sight Lines from Traffic Impact Study (TIS) should reflect the distances stated above, and the sight distances re-calculated for the Hoskings Ranch Road/SR-78, and Pine Hills Road/SR-78 intersections. 2
- No new access points will be allowed within the State Highway System. Individual access points for the proposed parcels that will abut SR-78/SR-79 will not be allowed; therefore, the development will need to be designed to direct all vehicles to the existing access points (Hoskings Ranch Road and Pine Valley Road) as indicated in the TIS. 3
- Project Trip Generation is projected at 990 Average Daily Traffic (ADT) with the AM and PM peak hour of zero (0) trips for Agriculture. Caltrans does not agree with the AM and PM peak hour trip generation for Agriculture as stated above. 4

- Project Trip Distribution: Please identify Project ADT, as well as the AM and PM peak hour volumes. 5
- Pine Hills Road/SR-78 intersection:
 - Existing westbound (WB) SR-78/79 left turn to Pine Hills Road will need to be lengthened as mitigation per Section 405.2 Left-turn Channelization of the most current Caltrans HDM. 6
 - Additional TIS information is needed. Depending on the number of agricultural vehicles and total vehicles that will access Pine Hills Road from SR-78/79, Caltrans may also require a right turn lane be constructed as mitigation in accordance with the most current Caltrans HDM*. 7
- For the Hoskings Ranch Road/SR-78 intersection:
 - As stated in the DEIR, Hoskings Ranch Road and Daley Flat Road are paved private roads and Hoskings Ranch Road is currently gated. However, the proposed project would take access via Hoskings Ranch Road onto SR-78/79. More information and clarification is needed regarding trip distribution. 8
On Hoskings Ranch Road. Verify if this access will be amended for agriculture used or would remain as a gated private access road. 9
 - WB SR-78/79 left turn lane to Hoskings Ranch Road will need to be constructed as mitigation in accordance with the most current Caltrans HDM. 10
 - Depending on the number of agricultural vehicles and total vehicles that will access Hoskings Ranch Road from SR-78/79, Caltrans may also require a right turn lane be constructed as mitigation in accordance with the most current Caltrans HDM. 11
 - If the gate is to remain operational and in place, an entering queuing analysis (exiting from SR-78/79) will be needed. Supplemental access control operational information (i.e. how is the gate opened, etc) will also need to be provided. 12
- Summary**
 - Caltrans uses HDM for sight distance analysis on state highways. Please resubmit sight distance using HDM standards. 13
 - Please verify how tree removal will mitigate sight distance based on HDM standards. 14
 - Please verify the type of heavy vehicles that will access the site for agricultural purposes. 15
 - Caltrans recommends channelization at the intersections of Hoskings Ranch Road and Pine Valley Road on SR-78/79 for operational and safety reasons due to the high speeds of the facility, speed differentials of vehicles slowing down at the intersections, as well as the introduction of heavy vehicles for agricultural purposes. 16

Mr. Campbell
October 16, 2013
Page 3

If you have any questions, or require further information, please contact Roger Sanchez, at (619) 688-6494.

Sincerely,

A handwritten signature in black ink, appearing to read 'J. Armstrong', written in a cursive style.

JACOB M. ARMSTRONG, Chief
Development Review Branch

Hoskings Ranch: Draft Response to Comments

January 24, 2015

Letter C: Department of Transportation

Note: The following responses make reference to a number of documents and graphics, some of which have been provided as attachments for ease of reference. The following attachments are included:

Attachment A: Sight Distance Diagram

Attachment B: Traffic Impact Study (TIS) Table 5-1, "Existing Configuration Sight Distance" and EIR Figure 2-3-3, "Sight Distance Constraints"

Attachment C: SANDAG's *San Diego Traffic Generators*, relevant portion, KOA memo

Attachment D: TIS graphics as follows: Table 1-1, Project Rip Generation; Figure 1-4, Project Rip Distribution; Figure 1-7, Project AM Peak Hour Trips; Figure 1-8, Project PM Peak Hour Trips; Figure 3-6, Existing AM Peak Hour Intersection Volumes with Project; and Figure 3-7, Existing PM Peak Hour Intersection Volumes with Project

Attachment E: EIR Figure 2-3-2, "Project Trip Distribution"; and Queueing Analysis

1. The comment is acknowledged. Sight distances have been met using this methodology, as discussed in 2 below.
2. The comment is acknowledged. The EIR analyzed sight distance (See DEIR Chapter 2, Section 2.3.2.5). The EIR also requires the project to provide adequate sight distance as a design feature. The analysis is based standards and methodologies set by the American Association of State Highway and Transportation Officials' (AASHTO) document titled *A Policy on Geometric Design of Highways and Streets* (2004), *Caltrans Highway Design Manual* (HDM), Topics 201 and 405 and *California Manual on Uniform Traffic Control Devices Part 2* (December 21, 2010). Please see Attachment A showing required sight distances. TIS Table 5-1, "Existing Configuration Sight Distance Summary" included here for convenience as Attachment B, details the results of the sight distance survey. The following points detail the methodology used:

Corner Sight Distance – The Caltrans Highway Design Manual (HDM) identifies desired stopping sight distance in Table 405.1A for each 5 mph increment of speed. Speed survey information is detailed in the TIS (EIR Appendix D, Chapter 5). The speed identified for SR 78/79 is 58 mph based on the Traffic Impact Study (TIS) speed survey. This speed was rounded up to 60 mph and for that

speed, 660 feet of corner sight distance is required. Speeds of 48 mph (northbound) and 47 mph (southbound) were recorded for Pine Hills Road, and were rounded up to 50 mph, resulting in a required sight distance of 550 feet.

Stopping Sight Distance – The Caltrans Highway Design Manual (HDM) identifies desired stopping sight distance in Topic 201, Index 201.1, Table 201.1 for each 5 mph increment of speed. The speed identified for SR 78/79 is 58 mph, as noted above. This was rounded up to 60 mph and for that speed 580 feet is required. Speeds of 48 mph (northbound) and 47 mph (southbound) were recorded for Pine Hills Road, as noted above, and were rounded up to 50 mph. The required sight distance for this speed is 430 feet.

Two intersections movements were found to lack adequate corner sight distance, as shown in TIS Table 5-1 (Attachment B). These are: (1) when northbound traffic on Pine Hills Road stops at the SR 78/79 intersection before making a left turn, corner sight distance looking right toward Julian is 535 feet. The optimal distance is conservatively 660 feet. (2) When eastbound traffic on Tenaya Road (the proposed entry road) stops at the Pine Hills Road intersection before making a turn, sight distance looking left is 400 feet. The optimal distance is conservatively 550 feet. To correct these deficiencies the TIS (page 39) and the EIR (Section 2.3.2.5, page 2-45) call for vegetation trimming or removal. This action is proposed as part of the project design. EIR Figure 2-3-3, "Sight Distance Constraints," included in Attachment B, was developed to assess the scope of the corner sight distance deficiencies. In the figure a signman has been located at the conservative distance and photos have been taken from the constrained vantage points. In all cases the signman is visible without recourse to vegetation removal. However, to maintain a conservative analysis, the project requires an assessment of these vantages and trimming or removal of the vegetation as needed.

3. This comment is directed to the fire station location. The applicant met with the Julian-Cuyamaca Fire Protection District Board of Directors on February 18, 2014. The result of the meeting is that the District no longer needs the proposed site. Therefore the fire station location has been removed and this concern about access no longer applies.
4. The TIS shows 1278 average daily trips (ADT) for the 24-lot Proposed Project and 728 ADT for the 34 lot project. Of these, 990 and 329 ADT are attributed to agriculture for the 24- and 34-lot projects, respectively. The agricultural trips are based on SANDAG's *San Diego Traffic Generators* publication, included as Attachment C. No peak hour trips are attributed to agriculture by the SANDAG document. After establishing agriculture on the site it became apparent that this number of trips does not correspond to the actual traffic generated by the agriculture currently occurring on the site. Actual trips have been much lower. SANDAG was asked for clarification but no response was received. Presently

there is agriculture (cattle grazing/breeding) on the site and the ranchers live off site but near the property. Whatever modest level of traffic that is currently associated with the existing use has been determined by consultation with a local rancher currently using the site. He makes on average two trips per week to the site for agricultural purposes (less than one ADT). A range of potential trip generators were evaluated to be conservative. These were doubled to reflect the fact that two ranchers use the site. The resulting table from the TIS memo (included here in Attachment C) indicates a little over 1 ADT attributable to the agricultural activity:

Existing cattle breeding	Day	Weekly	Monthly	Yearly
Rancher	0.57	4.00	17.33	208
Vet	0.13	0.92	4.00	48
Delivery of cattle	0.01	0.08	0.33	4
Pickup of cattle	0.01	0.08	0.33	4
Fence mending	0.03	0.23	1.00	12
Food delivery	0.13	0.92	4.00	48
Well maintenance	0.07	0.46	2.00	24
Biologist	0.07	0.46	2.00	24
Range Manager	0.07	0.46	2.00	24
Totals	1.08	6.69	29.00	396

The TIS, which incorporates agricultural traffic at the levels noted in the opening paragraph, is therefore very conservative. That analysis (EIR Appendix D) concluded that even with an over count of agricultural traffic, direct project level impacts were not significant.

Noting the points above, we believe the more likely and reasonable project traffic circumstances are represented by simply looking at the residential contribution only.

5. The information referenced in the comment is provided in the TIS (EIR Appendix D). (For convenience these graphics are also attached to this response as Attachment D).

- a. Table 1-1, Project Rip Generation, TIS page 3
 - b. Figure 1-4, Project Rip Distribution, TIS page 7
 - c. Figure 1-7, Project AM Peak Hour Trips, TIS page 10
 - d. Figure 1-8, Project PM Peak Hour Trips, TIS page 11
 - e. Figure 3-6, Existing AM Peak Hour Intersection Volumes with Project, TIS page 26
 - f. Figure 3-7, Existing PM Peak Hour Intersection Volumes with Project, TIS page 27
6. The proposed roadway improvements, listed below as items A-D, meet the design criteria of section 405.2 of the latest Caltrans HDM. These improvements reflect the reduction in overall traffic due to the lack of additional agricultural traffic as discussed in the response to Comment 4- above. These design improvements are shown graphically in Attachment A of this document.
- A. Lengthen exist westbound left turn from (70') to 200' left turn pocket & 120' bay taper.
 - B. Approach tapers will be curve radii of 1,150' per (HDM table 203.2) & pavement striping.
 - C. Provide a minimum of 580' stopping sight distance in both directions.
 - D. Provide a minimum of 660' of corner sight in both directions.
7. The comment is acknowledged. Responses 4, and 5 above indicate that traffic will be reduced as a result of the recalculation of agricultural trips previously used in the modeling effort to determine ADT. A right turn lane is not warranted because Caltrans HDM requirements are not triggered by this lower volume of trips generated by agricultural activities.
8. The Proposed Project trip distribution is provided in EIR Figure 2-3-2 and is included here for convenience as Attachment E. Hoskings Ranch Road is proposed to remain a private gated road. Attachment A of this document shows the existing gate configuration and operation. Given the low level of residential traffic and adequate queuing distance (discussed in response to 11 below) and queuing analysis, included as Attachment E of this document), the existing intersection configuration is adequate. As a precaution, signage will direct agricultural traffic to the Tenaya Road entrance on Pine Hills Road to the east.

The following is proposed and shown on Attachment A of this document for the Hoskings Ranch Road/SR 78/79 and the Pine Hills/SR 78/79 intersections. These improvements reflect the reduction in overall traffic due to the lack of additional agricultural traffic as discussed in the response to point 4 above.

- a. Provide a minimum of 580' stopping sight distance in both directions.
- b. Provide a minimum of 660' of corner sight in both directions.

9. The Hoskings Ranch Road access will remain private and gated. Agricultural use on the site is minimal, but as a precaution signage will be included directing any agricultural traffic to use the project entrance at Tenaya Road off of Pine Hills Road.
10. The comment is acknowledged. As to the specific improvement mentioned, the improvement is not warranted as discussed in Responses 4 and 5 above. Improvements to all roadway segments will use the latest HDM when improvements are made in the future.
11. The comment is acknowledged. The improvement is not warranted because the number of agricultural trips is very low, as discussed in Response 4 above. Improvements to all roadway segments will use the latest HDM when improvements are made in the future.
12. The comment is acknowledged. KOA Corporation has provided a queuing analysis, Attachment E, using information about the maximum peak arrivals in the PM hour and simple queuing analysis methodology. They used a gate "service time" of 20 seconds, although it is anticipated vehicles could proceed more quickly. Using this information the probability of there being zero seconds of delay at the gate is 98.65%. Similarly, the probability of there being as many as two vehicles in the queue is 0.02%. Assuming 25 feet for each vehicle, that represents 75 feet of storage. Per field measurement on Feb 4th 2014, the existing gated entrance is setback from the edge of highway a distance of 121 feet and the keypad is setback 87 feet as shown on Attachment A. Therefore, sufficient distance exists and there is room for up to three stored vehicles at the gate.
13. Sight distance has been calculated by KOA Corporation using Caltrans HDM sight distance standards, as detailed in Response 2 above. Please see photo exhibits included in Attachments A and B showing sight visibility for the various project intersections.
14. Corner and stopping sight distance will be maintained in accordance with Caltrans Highway Design Manual standards. Response 2 above provides a detailed discussion of the sight distance issue. EIR Figure 2-3-2 (included in Attachment E) graphically presents the sight distance at the two intersection conditions where the traffic analysis indicated there could be less than adequate corner sight distance. Figure 2-3-2 shows that while there is currently visibility, represented by the signman pictured, brush and tree branches and a tree trunk come close to obscuring the line of sight. This is the vegetation that would be trimmed or removed as a result of the project. With the vegetation trimmed or removed the drivers' lines of sight would be unobstructed for the full distance required by the analysis. Any work in the Caltrans right of way will be coordinated in advance and proper permits

for work in the Caltrans right of way will be obtained.

15. The comment is acknowledged. The level of agricultural traffic is discussed in response to point 4 above. The size and type of vehicle would range from half-ton pickups to semi-trucks with livestock trailers suitable for the transport of cattle would be used two to four times a year to bring cattle to the site in the summer/fall and remove them in the spring/summer.
16. The improvement is not warranted based on the discussions in Responses 4, 6, and 8 above. The following proposed improvements to Hoskings Ranch Road/SR 78/79 and Pine Hills Road/SR 78/79 reflect the lack of project level impacts and the reduction in overall traffic due to the lack of additional agricultural traffic:
 - a. Provide a minimum of 580' stopping sight distance in both directions.
 - b. Provide a minimum of 660' of corner sight in both directions.

Hoskings Ranch Road will remain gated and signage will direct any heavy agricultural traffic to the Tenaya Road entry on Pine Hills Road. Details are provided in Responses 8 and 9 above.

ATTACHMENT A

ATTACHMENT B

Table 5-1

Existing Configuration Sight Distance Summary

Maneuver	Prevailing Speed (MPH) ¹	Existing Sight Distance (feet)				
		Type	Evasive Action	Needed ²	Available	Adequate?
Hoskings Ranch Road/SR-78/79						
Left turn from Hoskings Ranch Road looking right	58(2)	Corner	B slows for A	660	710	Yes
		Stopping	B stops for A	580	585	Yes
Right turn from Hoskings Ranch Road looking right	58	Corner	C slows for A	660	985	Yes
		Stopping	C stops for A	580	750	Yes
EB through on SR-78/79 looking east	58	Corner	----	----	----	----
		Stopping	B stops for D	580	750	Yes
Pine Hills Road/SR-78/79						
Left turn from Pine Hills Road looking right	58	Corner	B slows for A	660	535	No
		Stopping	B stops for A	580	950	Yes
Right turn from Pine Hills Road looking left	58	Corner	C slows for A	660	750	Yes
		Stopping	C stops for A	580	750	Yes
EB through on SR 78/79 looking east	58	Corner	----	----	----	----
		Stopping	B stops for D	580	750	Yes
Tenaya Road/Pine Hills Road						
Left turn from Tenaya looking right	48	Corner	B slows for A	550	665	Yes
		Stopping	B stops for A	430	670	Yes
Right turn from Tenaya looking left	47	Corner	C slows for A	550	400	No
		Stopping	C stops for A	430	745	Yes
SB through on Pine Hills Road looking south	47	Corner	----	----	----	----
		Stopping	B stops for D	430	725	Yes

¹58 MPH rounded up to 60 MPH, 48 and 47 MHP rounded up to 50 MPH

²Caltrans Guidelines were used. County guidelines are 580 and 440 feet for 60 and 50 MHP respectively. AASHTO guidelines are 640 and 530 feet for 60 and 50 MHP respectively.

Southbound traffic on Pine Hills Road (Major Road) approaching right-turn out from Tenaya Road (Minor Road)

Westbound traffic on SR-78/79 (Major Road) approaching left-turn out from the north side of Pine Hills Road (Minor Road)

Photo 1: "A" looking to "C"

Photo 2: "C" looking to "A"

Photo 1: "A" looking to "B"

Photo 2: "B" looking to "A"

Minor Road vehicle looking to Major Road vehicle

Major Road vehicle looking to Minor Road vehicle

Minor Road vehicle looking to Major Road vehicle

Major Road vehicle looking to Minor Road vehicle



Photo 1 (zoom): "A" looking to "C"

Photo 2 (zoom): "C" looking to "A"

Photo 1 (zoom): "A" looking to "B"

Photo 2 (zoom): "B" looking to "A"

Minor Road vehicle looking to Major Road vehicle

Major Road vehicle looking to Minor Road vehicle

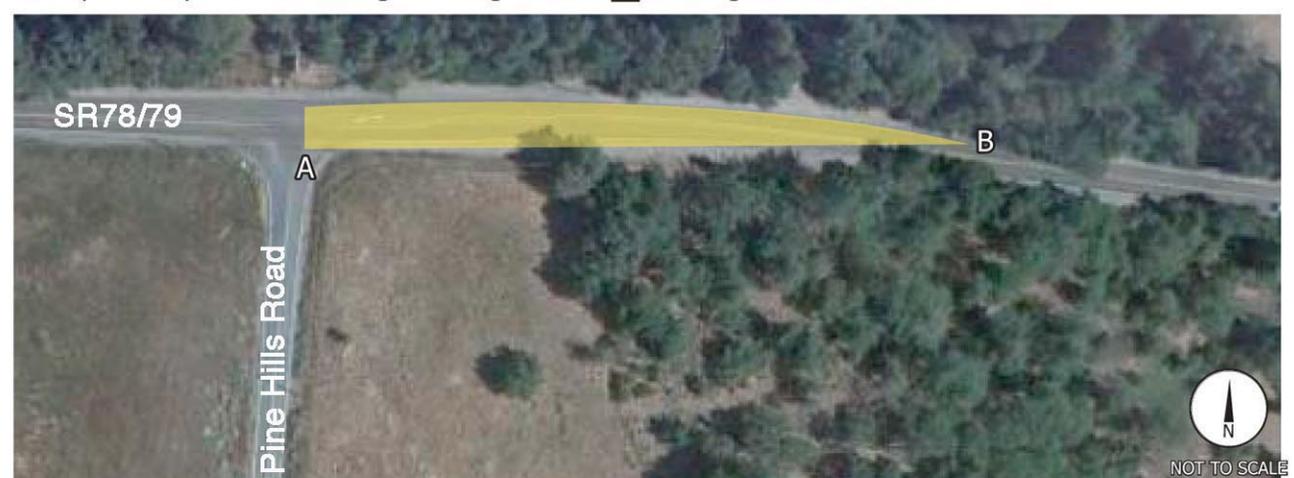
Minor Road vehicle looking to Major Road vehicle

Major Road vehicle looking to Minor Road vehicle



Conceptual Layout of Clear Sight Triangle Existing = 400 feet

Conceptual Layout of Clear Sight Triangle Existing = 535 feet



Sight Distance Constraints

Figure 2-3-3

Source: KOA

ATTACHMENT C

MEMORANDUM

To: File JBxxxx
 From: Arnold Torma, P.E., Senior Traffic Engineer
 Re: Agricultural Trip Generation
 Project: Hoskings Ranch re: A82033
 Date: November 14, 2014

Although the Traffic Impact Study shows 1278 daily trips for the 24-lot Proposed Project and 728 daily trips for the 34 lot project these numbers are based on SANDAG data. We have asked SANDAG for clarification but received no response yet. These numbers are theoretical with the actual trips being a fraction of these amounts. Earlier studies determined that cattle breeding was the only economically viable agriculture on the land. Presently there is agriculture (cattle breeding) on the land, the rancher lives off site. He makes on average two trips per week to the site for agricultural purposes. Based on these actual numbers agricultural trips are not included in the determination that no or minimum impact to the state highways is anticipated.

See example below of existing traffic use - We have doubled it to be conservative.

Existing cattle breeding	Day	Weekl y	Monthly	Yearly
Rancher	0.57	4.00	17.33	208
Vet	0.13	0.92	4.00	48
Delivery of cattle	0.01	0.08	0.33	4
Pickup of cattle	0.01	0.08	0.33	4
Fence mending	0.03	0.23	1.00	12
Food delivery	0.13	0.92	4.00	48
Well maintenance	0.07	0.46	2.00	24
Biologist	0.07	0.46	2.00	24
Range Manager	0.07	0.46	2.00	24
Totals	1.08	6.69	29.00	396

The standard SANDAG ADT generation rates for agriculture are for properties that are only used for agricultural product and not necessarily related to combined residential and agricultural uses on the same property. The SANDAG traffic numbers do not represent the existing actual cattle breeding operation as shown above.

The property (1,416.5 ac.) is presently being grazed in a cattle breeding operation which is an agricultural use. After the Proposed Project's approval, agricultural acreage will be reduced to approximately 495 acres. Whatever modest level of traffic that is currently associated with the existing use has been determined by consultation with the local rancher currently using the site. This estimate puts the agricultural traffic at approximately 1 ADT (See example above). This very low level of traffic would not significantly change the counts used for existing traffic. Therefore, the result of the traffic analysis is very conservative. Peak period percentages were not included since SANDAG did not identify any peak period percentages in the "San Diego Traffic Generators" publication we do not find any further agricultural information available from ITE or other publications.

Noting the points above, we believe the more likely and reasonable Proposed Project traffic circumstances are represented by simply looking at the residential contribution only.

AT

(NOT SO)
**BRIEF GUIDE OF VEHICULAR TRAFFIC GENERATION RATES
 FOR THE SAN DIEGO REGION**



401 B Street, Suite 800
 San Diego, California 92101
 (619) 699-1900 • Fax (619) 699-1950

APRIL 2002

NOTE: This listing only represents a *guide* of average, or estimated, traffic generation "driveway" rates and some very general trip data for land uses (emphasis on acreage and building square footage) in the San Diego region. These rates (both local and national) are subject to change as future documentation becomes available, or as regional sources are updated. For more specific information regarding traffic data and trip rates, please refer to the San Diego Traffic Generators manual. *Always check with local jurisdictions for their preferred or applicable rates.*

LAND USE	TRIP CATEGORIES [PRIMARY:DIVERTED:PASS-BY] ^P	ESTIMATED WEEKDAY VEHICLE TRIP GENERATION RATE (DRIVEWAY)	HIGHEST PEAK HOUR % (plus IN:OUT ratio)		TRIP LENGTH (Miles) ^L
			Between 6:00-9:30 A.M.	Between 3:00-6:30 P.M.	
AGRICULTURE (Open Space)	[80:18:2]	2/acre**			10.8
AIRPORT	[78:20:2]				12.5
Commercial		60/acre, 100/flight, 70/1000 sq. ft. * **	5% (6:4)	8% (5:5)	
General Aviation		6/acre, 2/flight, 6/based aircraft * **	9% (7:3)	15% (5:5)	
Heliports		100/acre**			
AUTOMOBILE^S					
Car Wash					
Automatic		900/site, 600/acre**	4% (5:5)	9% (5:5)	
Self-serve		100/wash stall**	4% (5:5)	8% (5:5)	
Gasoline	[21:51:28]				2.8
with/Food Mart		160/vehicle fueling space**	7% (5:5)	8% (5:5)	
with/Food Mart & Car Wash		155/vehicle fueling space**	8% (5:5)	9% (5:5)	
Older Service Station Design		150/vehicle fueling space, 900/station**	7% (5:5)	9% (5:5)	
Sales (Dealer & Repair)		50/1000 sq. ft., 300/acre, 60/service stall * **	5% (7:3)	8% (4:6)	
Auto Repair Center		20/1000 sq. ft., 400/acre, 20/service stall*	8% (7:3)	11% (4:6)	
Auto Parts Sales		60/1000 sq. ft. **	4%	10%	
Quick Lube		40/service stall**	7% (6:4)	10% (5:5)	
Tire Store		25/1000 sq. ft., 30/service stall**	7% (6:4)	11% (5:5)	
CEMETERY		5/acre*			
CHURCH (or Synagogue)	[64:25:11]	9/1000 sq. ft., 30/acre** (quadruple rates for Sunday, or days of assembly)	5% (6:4)	8% (5:5)	5.1
COMMERCIAL/RETAIL^S					
Super Regional Shopping Center (More than 80 acres, more than 800,000 sq. ft., w/usually 3+ major stores)		35/1000 sq. ft., ^C 400/acre*	4% (7:3)	10% (5:5)	
Regional Shopping Center	[54:35:11]	50/1000 sq. ft., ^C 500/acre*	4% (7:3)	9% (5:5)	5.2
(40-80 acres, 400,000-800,000 sq. ft., w/usually 2+ major stores)					
Community Shopping Center	[47:31:22]	80/1000 sq. ft., 700/acre* **	4% (6:4)	10% (5:5)	3.6
(15-40 acres, 125,000-400,000 sq. ft., w/usually 1 major store, detached restaurant(s), grocery and drugstore)					
Neighborhood Shopping Center (Less than 15 acres, less than 125,000 sq. ft., w/usually grocery & drugstore, cleaners, beauty & barber shop, & fast food services)		120/1000 sq. ft., 1200/acre* **	4% (6:4)	10% (5:5)	
Commercial Shops	[45:40:15]				
Specialty Retail/Strip Commercial		40/1000 sq. ft., 400/acre*	3% (6:4)	9% (5:5)	4.3
Electronics Superstore		50/1000 sq. ft.**		10% (5:5)	
Factory Outlet		40/1000 sq. ft.**	3% (7:3)	9% (5:5)	
Supermarket		150/1000 sq. ft., 2000/acre* **	4% (7:3)	10% (5:5)	
Drugstore		90/1000 sq. ft.**	4% (6:4)	10% (5:5)	
Convenience Market (15-16 hours)		500/1000 sq. ft.**	8% (5:5)	8% (5:5)	
Convenience Market (24 hours)		700/1000 sq. ft.**	9% (5:5)	7% (5:5)	
Convenience Market (w/gasoline pumps)		850/1000 sq. ft., 550/vehicle fueling space**	6% (5:5)	7% (5:5)	
Discount Club		60/1000 sq. ft., 600/acre* **	1% (7:3)	9% (5:5)	
Discount Store		60/1000 sq. ft., 600/acre**	3% (6:4)	8% (5:5)	
Furniture Store		6/1000 sq. ft., 100/acre**	4% (7:3)	9% (5:5)	
Lumber Store		30/1000 sq. ft., 150/acre**	7% (6:4)	9% (5:5)	
Home Improvement Superstore		40/1000 sq. ft.**	5% (6:4)	8% (5:5)	
Hardware/Paint Store		60/1000 sq. ft., 600/acre**	2% (6:4)	9% (5:5)	
Garden Nursery		40/1000 sq. ft., 90/acre**	3% (6:4)	10% (5:5)	
Mixed Use: Commercial (w/supermarket)/Residential		110/1000 sq. ft., 2000/acre* (commercial only) 5/dwelling unit, 200/acre* (residential only)	3% (6:4) 9% (3:7)	9% (5:5) 13% (6:4)	
EDUCATION					
University (4 years)	[91:9:0]	2.4/student, 100 acre*	10% (8:2)	9% (3:7)	8.9
Junior College (2 years)	[92:7:1]	1.2/student, 24/1000 sq. ft., 120/acre* **	12% (8:2)	9% (6:4)	9.0
High School	[75:19:6]	1.3/student, 15/1000 sq. ft., 60/acre* **	20% (7:3)	10% (4:6)	4.8
Middle/Junior High	[63:25:12]	1.4/student, 12/1000 sq. ft. 50/acre**	30% (6:4)	9% (4:6)	5.0
Elementary	[57:25:10]	1.6/student, 14/1000 sq. ft., 90/acre* **	32% (6:4)	9% (4:6)	3.4
Day Care	[28:58:14]	5/child, 80/1000 sq. ft.**	17% (5:5)	18% (5:5)	3.7
FINANCIAL^S	[35:42:23]				3.4
Bank (Walk-In only)		150/1000 sq. ft., 1000/acre* **	4% (7:3)	8% (4:6)	
with Drive-Through		200/1000 sq. ft., 1500/acre*	5% (6:4)	10% (5:5)	
Drive-Through only		250 (125 one-way)/lane*	3% (5:5)	13% (5:5)	
Savings & Loan		60/1000 sq. ft., 600/acre**	2%	9%	
Drive-Through only		100 (50 one-way)/lane**	4%	15%	
HOSPITAL	[73:25:2]				8.3
General		20/bed, 25/1000 sq. ft., 250/acre*	8% (7:3)	10% (4:6)	
Convalescent/Nursing		3/bed**	7% (6:4)	7% (4:6)	
INDUSTRIAL					
Industrial/Business Park (commercial included)	[79:19:2]	16/1000 sq. ft., 200/acre* **	12% (8:2)	12% (2:8)	9.0
Industrial Park (no commercial)		8/1000 sq. ft., 90/acre**	11% (9:1)	12% (2:8)	
Industrial Plant (multiple shifts)	[92:5:3]	10/1000 sq. ft., 120/acre*	14% (8:2)	15% (3:7)	11.7
Manufacturing/Assembly		4/1000 sq. ft., 50/acre**	19% (9:1)	20% (2:8)	
Warehousing		5/1000 sq. ft., 60/acre**	13% (7:3)	15% (4:6)	
Storage		2/1000 sq. ft., 0.2/vault, 30/acre*	6% (5:5)	9% (5:5)	
Science Research & Development		8/1000 sq. ft., 80/acre*	16% (9:1)	14% (1:9)	
Landfill & Recycling Center		6/acre	11% (5:5)	10% (4:6)	

(OVER)

MEMBER AGENCIES: Cities of Carlsbad, Chula Vista, Coronado, Del Mar, El Cajon, Encinitas, Escondido, Imperial Beach, La Mesa, Lemon Grove, National City, Oceanside, Poway, San Diego, San Marcos, Santee, Solana Beach, Vista and County of San Diego.

ADVISORY/LIAISON MEMBERS: California Department of Transportation, County Water Authority, U.S. Department of Defense, S.D. Unified Port District and Tijuana/Baja California.

ATTACHMENT D

PROJECT TRIP GENERATION

Trip generation is a measure or forecast of the number of trips that begin or end at the project site. The traffic generated is a function of the extent and type of development proposed for the site. These trips will result in some traffic increases on the streets where they occur. Vehicular traffic generation characteristics for projects are estimated based on established rates. These rates identify the probable traffic generation of various land uses based studies of developments in comparable settings. The rates used in this analysis were determined based on rates contained in the (SANDAG) (Not So) Brief Guide of Vehicular Traffic Generation Rates for the San Diego Region (2002). This manual provides standards and recommendations for the probable traffic generation of various land uses based upon local, regional and nationwide studies of existing developments in comparable settings. Appendix C contains excerpts from this manual. Table 1-1 and 1-2 summarizes the trips generated by the proposed project.

**Table 1-1
Project Trip Generation**

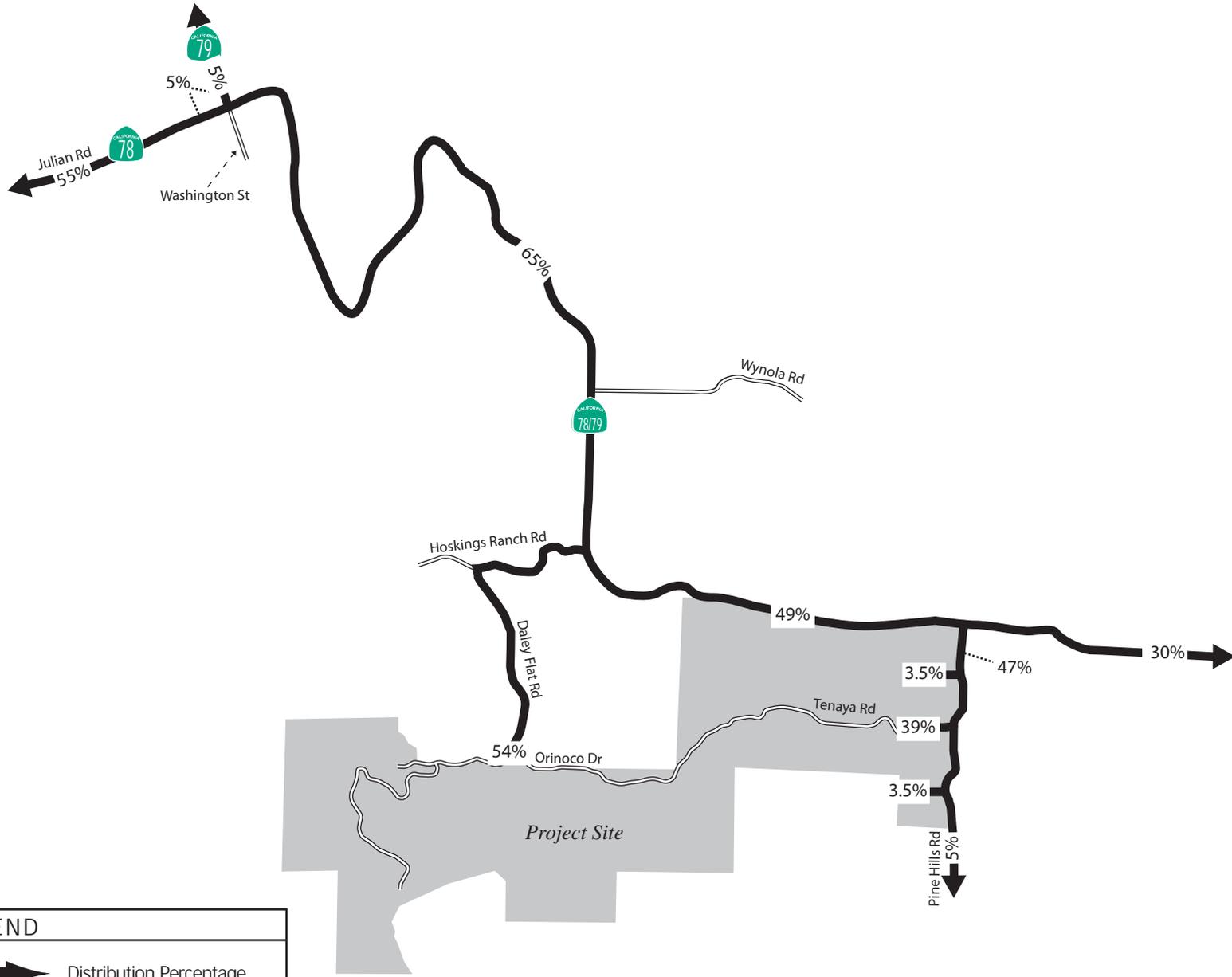
Land Use	Intensity	Units	Rate/Trips	Daily	AM Peak Hour			PM Peak Hour		
					Total	In	Out	Total	In	Out
Estate Residential	24	Dwelling	Rate	12	8%	30%	70%	10%	70%	30%
			Trips	288	23	7	16	29	20	9
Agriculture	495	AC	Rate	2	0%	0%	0%	0%	0%	0%
			Trips	990	0	0	0	0	0	0
Total				1278	23	7	16	29	20	9

Note: Numbers may not total due to rounding.

**Table 1-2
Consolidated Project Alternative Trip Generation**

Land Use	Intensity	Units	Rate/Trips	Daily	AM Peak Hour			PM Peak Hour		
					Total	In	Out	Total	In	Out
Estate Residential	34	Dwelling	Rate	12	8%	30%	70%	10%	70%	30%
			Trips	408	33	10	23	41	29	12
Agriculture	160	AC	Rate	2	0%	0%	0%	0%	0%	0%
			Trips	320	0	0	0	0	0	0
Total				728	33	10	23	41	29	12

Note: Numbers may not total due to rounding.



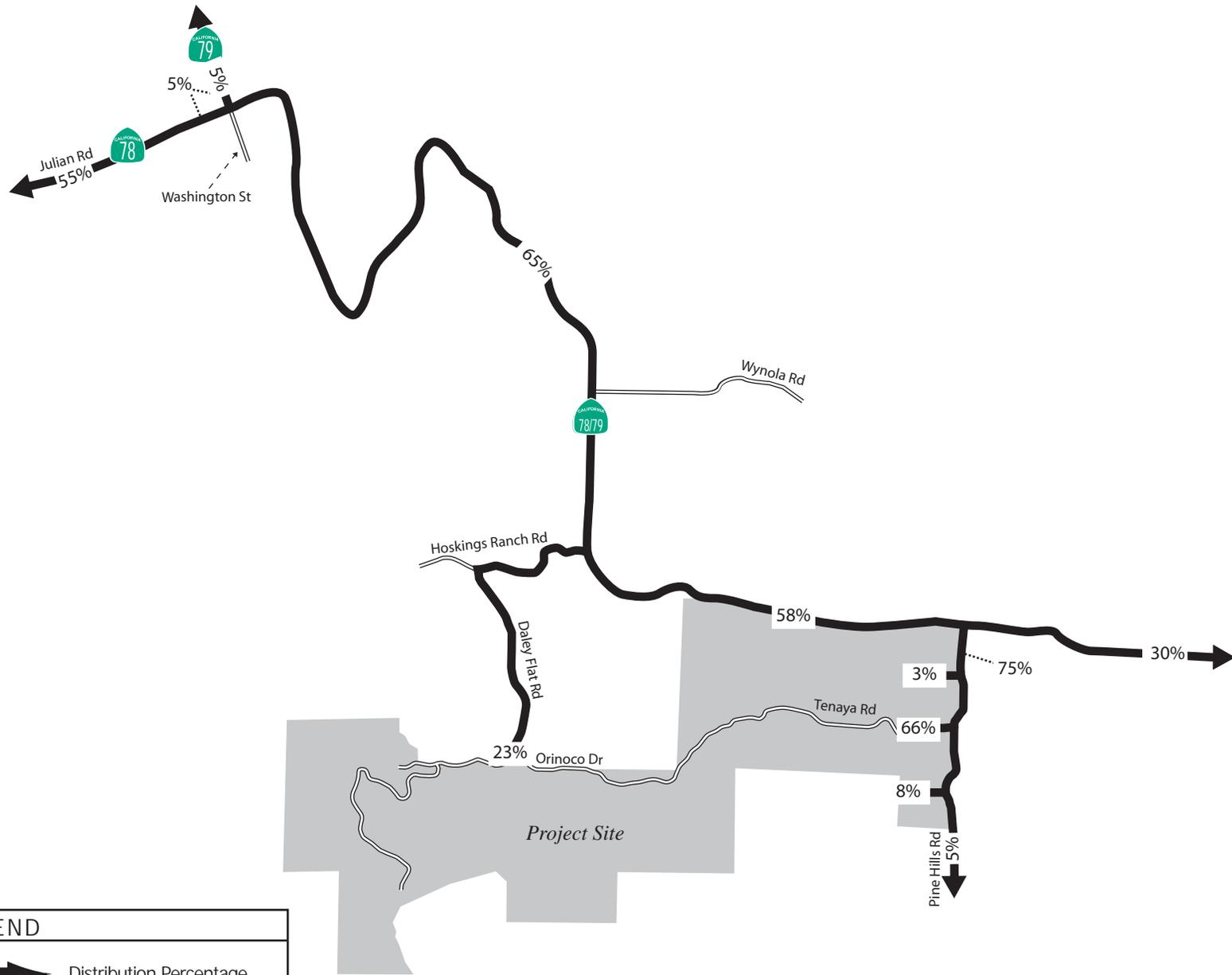
LEGEND

■ 15% ➔ Distribution Percentage

Figure 1-4
Project Trip Distribution



Not To Scale
September 2012



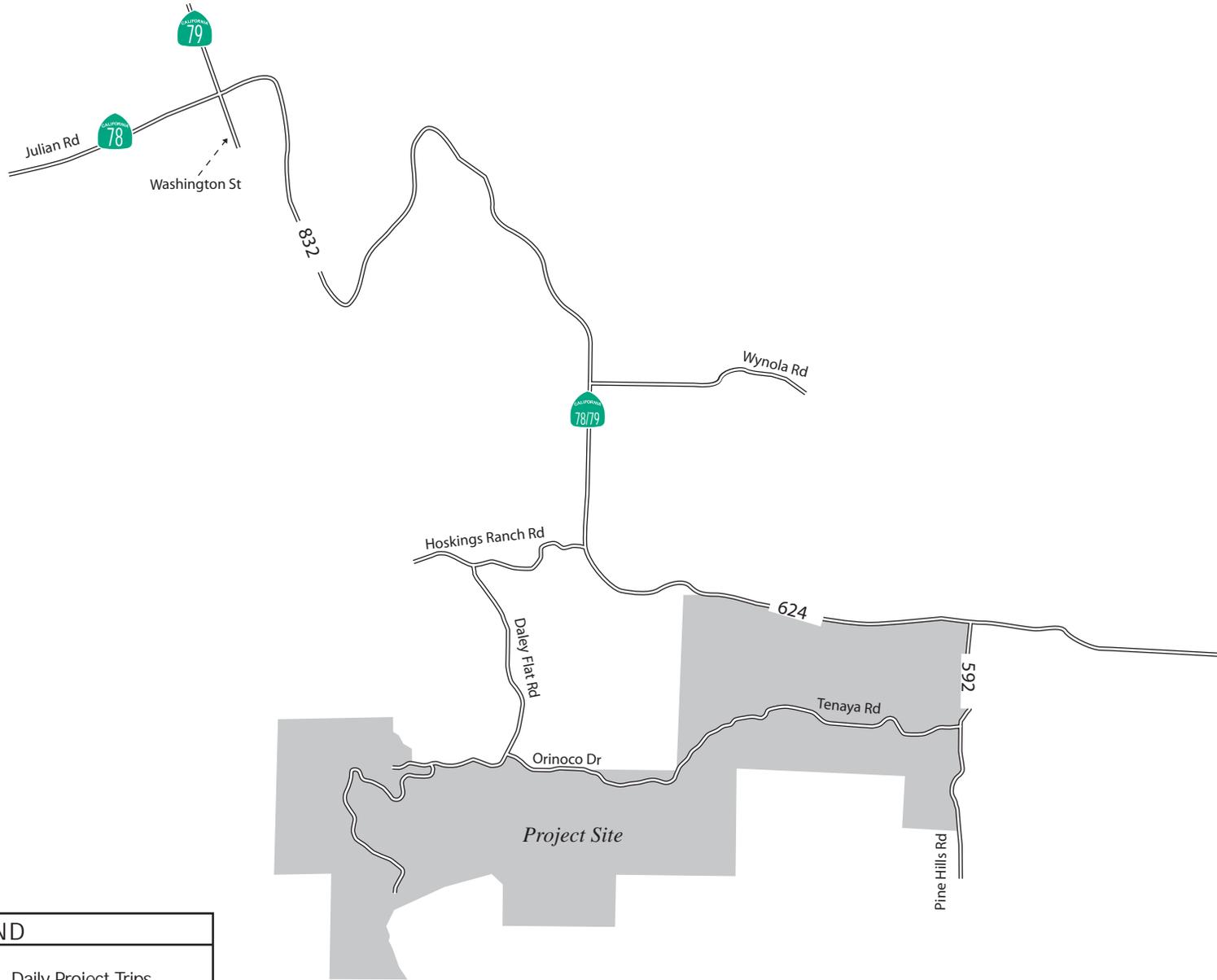
LEGEND

■ 15% ➔ Distribution Percentage

Figure 1-5
Consolidated Project Alternative Trip Distribution



Not To Scale

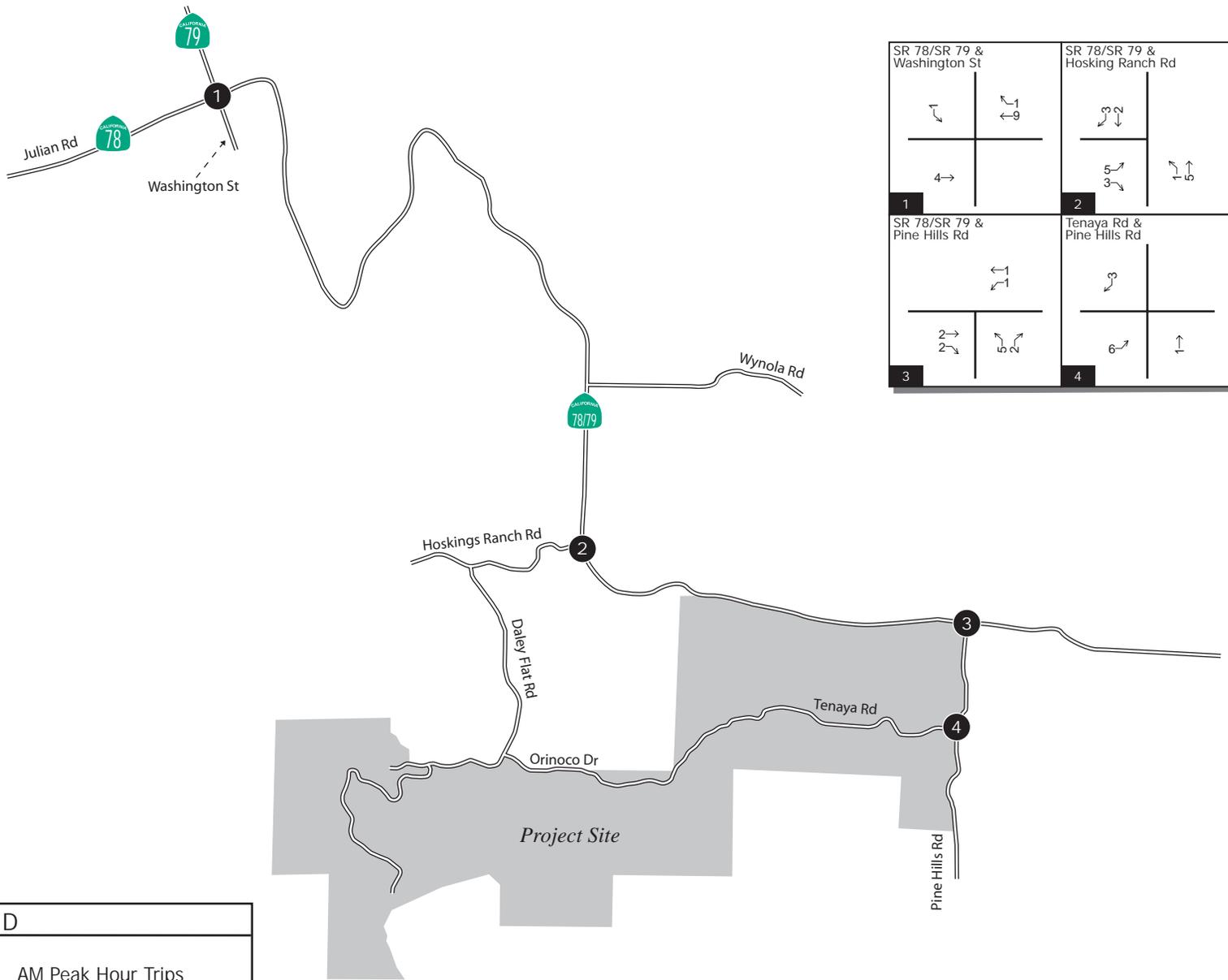


LEGEND	
—15—	Daily Project Trips

Figure 1-6
Project Daily Trips Project



Not To Scale

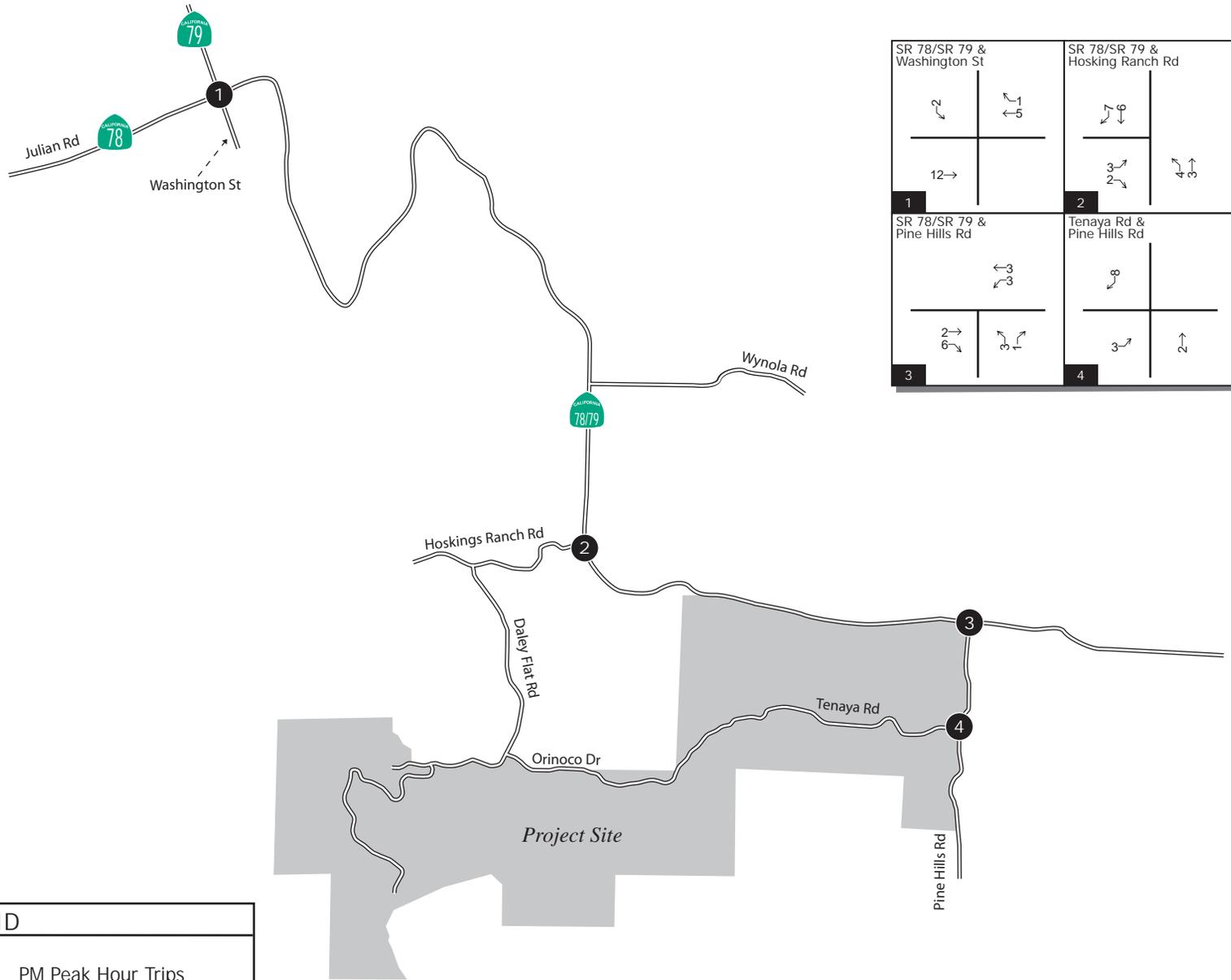


LEGEND	
10	↙ AM Peak Hour Trips

Figure 1-7
Project AM Peak Hour Trips



Not To Scale

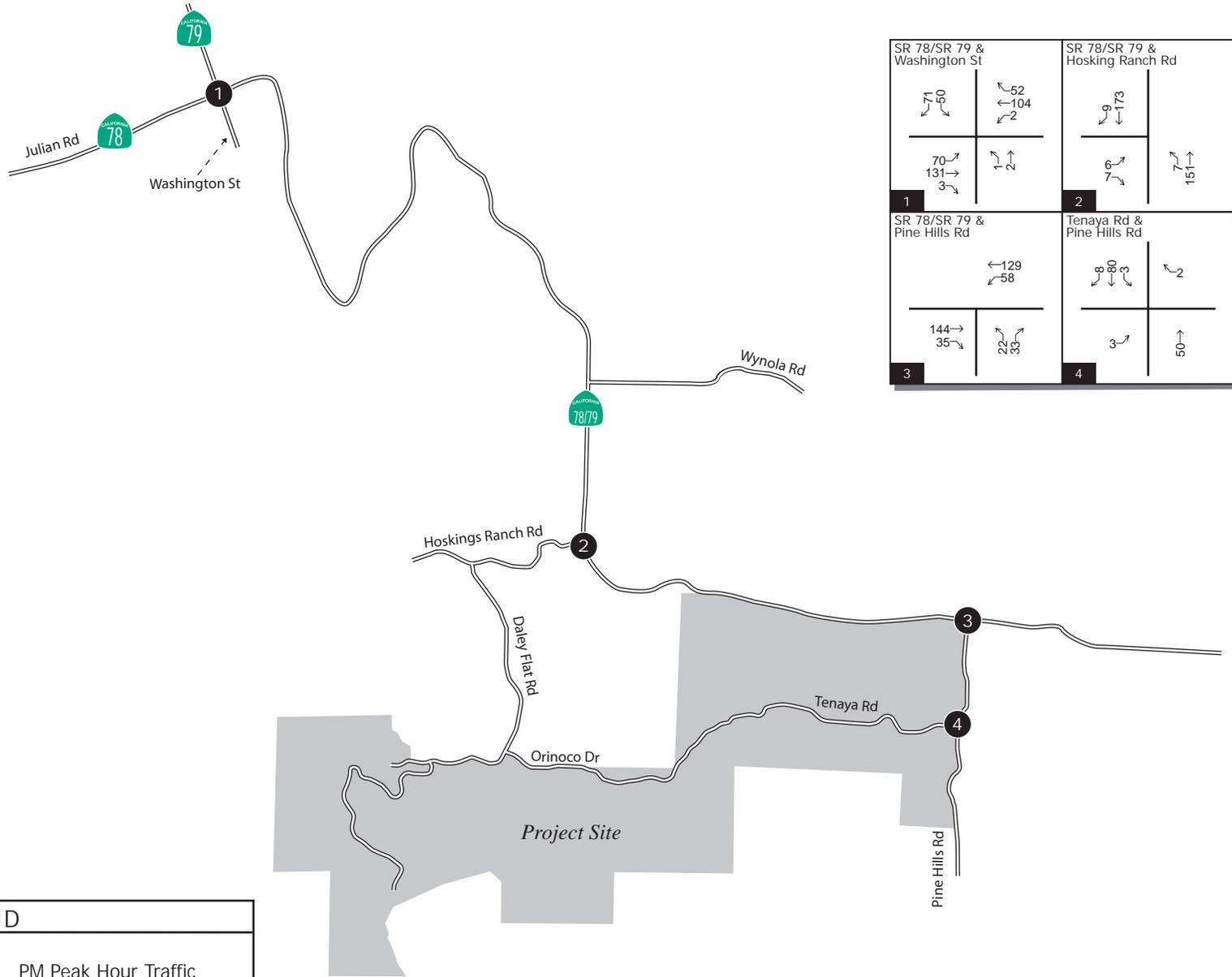


LEGEND	
10	↘ PM Peak Hour Trips

Figure 1-8
Project PM Peak Hour Trips



Not To Scale



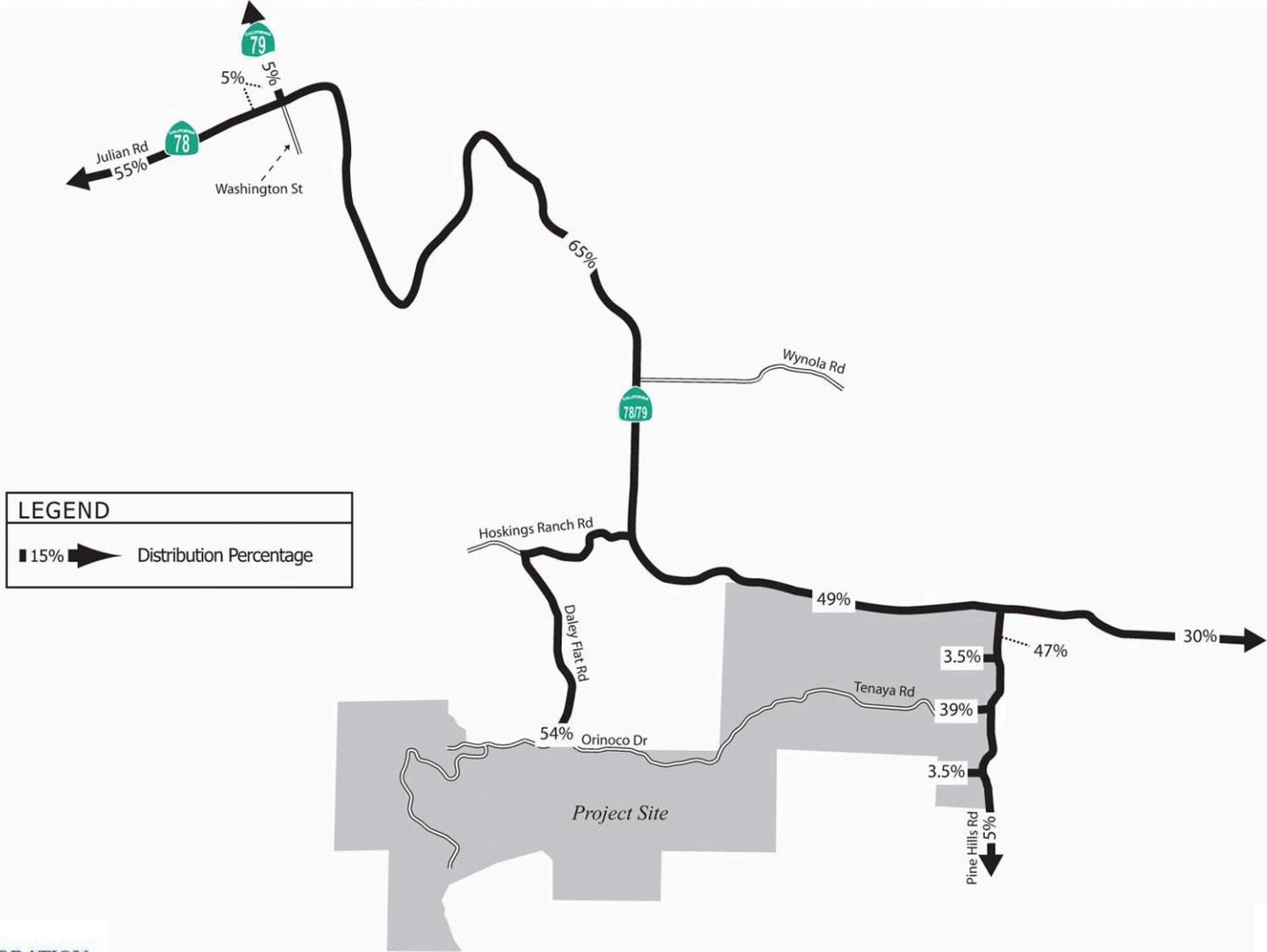
LEGEND	
10	↗ PM Peak Hour Traffic

Figure 3-7
Existing PM Peak Hour Intersection Volumes With Project



Not To Scale

ATTACHMENT E



Attachment "D"
Queueing theory calculator
Worst Case - PM Peak Period Hoskings Ranch Rd with Project
<http://www.supositorio.com/rcalc/rcalclite.htm>

Choose queueing model.	Space for calculations. Eg. insert 2+2 then press Res.	Data analysis. Insert list. Press Analyze to get goodness of fit p-value	If you love this calculator, so will your classmates, students and friends. Please share it with them:
<input type="checkbox"/> M/M/C <input type="checkbox"/> M/M/Inf. <input type="checkbox"/> M/M/C/K <input type="checkbox"/> M/M/C/*M <input type="text" value="1"/>			<p>1062 ✓</p> <p>42 ✓</p> <p>8 ✓</p> <p>24 ✓</p> <p>25 ✓</p> <p>Google + ✓</p> <p>41 ✓</p>

C (No. of Servers)	K (Queue capacity)	M (Entities population)	λ (incoming rate)	μ (service rate)	<input type="text" value="1"/> hrs/day
<input type="text" value="1"/>	<input type="text" value="Infinity"/>	<input type="text" value="Infinity"/>	<input type="text" value="0.27"/> units in/Sec	<input type="text" value="20"/> units out/Sec	<input type="button" value="Clear Form"/>

Round to decimal places.

ρ (Server utilization)	L (Average entities in system)	Lq (Average entities in queue)	W [s] (Average time spent in system)	Wq [s] (Average time waiting in line)	λ	Pn ... n = <input type="text" value="2"/> (Probability of 'n' entities being in the system)
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P (time in queue <=	<input type="text" value="0"/> secs)=	<input type="text" value="0.9865"/>
P(time in system <=	<input type="text" value="0"/> secs)=	<input type="text" value="0"/>

NATIVE AMERICAN HERITAGE COMMISSION

1550 Harbor Boulevard
West Sacramento, CA 95691
(916) 373-3715
(916) 373-5471 – FAX
e-mail: ds_nahc@pacbell.net

RECEIVED
SEP 24 2013

Planning and
Development Services

September 20, 2013

Mr. Dennis Campbell

County of San Diego Planning & Development Services

5510 Overland Avenue, Suite 310
San Diego, CA 92123

RE: SCH#2003081154 CEQA Notice of Completion; draft Environmental Impact Report (DEIR) for the **“Hoskings Ranch Tentative Map Project;”** located in the Julian area; San Diego County, California

D

Dear Mr. Campbell:

The Native American Heritage Commission (NAHC) has reviewed the Court decision (170 Cal App 3rd 604), the court held that the NAHC has jurisdiction and special expertise, as a state agency, over affected Native American resources impacted by proposed projects, including archaeological places of religious significance to Native Americans, and to Native American burial sites.

The California Environmental Quality Act (CEQA) states that any project which includes archeological resources, is a significant effect requiring the preparation of an EIR (CEQA guidelines 15064.5(b)). To adequately comply with this provision and mitigate project-related impacts on archaeological resources, the Commission recommends the following actions be required:

Contact the appropriate Information Center for a record search to determine :If a part or all of the area of project effect (APE) has been previously surveyed for cultural places(s), The NAHC recommends that known traditional cultural resources recorded on or adjacent to the APE be listed in the draft Environmental Impact Report (DEIR).

1

If an additional archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey. We suggest that this be coordinated with the NAHC, if possible. The final report containing site forms, site significance, and mitigation measurers should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum, and not be made available for pubic disclosure

2

pursuant to California Government Code Section 6254.10.

A list of appropriate Native American Contacts for consultation concerning the project site has been provided and is attached to this letter to determine if the proposed active might impinge on any cultural resources. Lack of surface evidence of archeological resources does not preclude their subsurface existence.

2

Lead agencies should include in their mitigation plan provisions for the identification and evaluation of accidentally discovered archeological resources, pursuant to California Health & Safety Code Section 7050.5 and California Environmental Quality Act (CEQA) §15064.5(f). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American, with knowledge in cultural resources, should monitor all ground-disturbing activities. Also, California Public Resources Code Section 21083.2 require documentation and analysis of archaeological items that meet the standard in Section 15064.5 (a)(b)(f). Lead agencies should include in their mitigation plan provisions for the disposition of recovered artifacts, in consultation with culturally affiliated Native Americans. Lead agencies should include provisions for discovery of Native American human remains in their mitigation plan. Health and Safety Code §7050.5, CEQA §15064.5(e), and Public Resources Code §5097.98 mandates the process to be followed in the event of an accidental discovery of any human remains in a location other than a dedicated cemetery.

3

Sincerely,



Dave Singleton
Program Analyst

CC: State Clearinghouse

Attachment: Native American Contacts list

Hoskings Ranch: Draft Response to Comments

December 5, 2014

Letter D: The California Native American Heritage Commission

1. The County concurs with the comment. The appropriate centers were contacted and a record search was conducted, as detailed in the *Cultural Resources Assessment* dated July 2013, Section 1.2.2., and as acknowledged in the DEIR, Section 2.2.2, page 2-34. Traditional cultural resources recorded on the site are listed in the EIR, Tables 2-2-1 through 2-2-4. No changes to the DEIR are required in response to the comment.
2. This comment is consistent with the cultural resource assessment conducted by the County Department of Planning and & Development Services. A Cultural Resource Assessment is included in the DEIR as Appendix C and its contents are summarized in the DEIR Chapter 2.2. A separate confidential report was prepared discussing site locations. Native American consultation occurred, as detailed in Chapter 7.0 of the technical report. No changes to the DEIR are required in response to the comment.
3. The County concurs with the comment. The comment is consistent with the mitigation requirements detailed in Section 2.2.5, Mitigation, starting on page 2-39 of the DEIR. Mitigation also includes monitoring and curation of any artifacts found. No changes to the DEIR are required in response to the comment.



Julian Community Planning Group

P.O. Box 249, Julian, CA 92036

RECEIVED
OCT 17 2013
Planning and Development Services

October 14, 2013

Mr. Dennis Campbell
Planning and Development Services
County of San Diego
5510 Overland Ave. Suite 110
San Diego CA 92123

E

Dear Dennis;

The Julian Community Planning Group has reviewed the EIR for the Hoskings Ranch Subdivision near the Town of Julian. We find the issues to be consistent with previous reviews of the project that we have conducted. We wish to restate our strong preference for the preferred project in which all of the parcels exceed 40 acres in size. Considering that this is an agricultural subdivision and to be consistent with the surrounding ranch lands we believe that the cluster of ten to fifteen acre parcels to be unacceptable.

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Sincerely

Jack D. Shelver
Chair

Hoskings Ranch: Draft Response to Comments

December 5, 2014

Letter E: Julian Community Planning Group

1. Comment noted. The County appreciates the Planning Group's review and involvement in the process.
2. The Planning Group's preference for the Proposed Project over the Consolidated Project Alternative is noted.

#4



San Diego County Archaeological Society, Inc.

Environmental Review Committee

13 October 2013

To: Mr. Dennis Campbell
 Department of Planning and Development Services
 County of San Diego
 5510 Overland Avenue, Suite 110
 San Diego, California 92123

Subject: Draft Environmental Impact Report
 Hoskings Ranch Tentative Map
 PDS2003 3100-5312, Log No. 3910-03-10-005

Dear Mr. Campbell:

I have reviewed the cultural resources aspects of the subject on behalf of this committee of the San Diego County Archaeological Society.

F

Based on the information contained in the DEIR and its cultural resources appendix, Appendix C, we have the following comments:

1. We appreciate the applicant, the County, and the consulted Native American groups' producing a tentative map which locates nearly all--and all the significant--historical and archaeological sites in open space. Avoidance of impacts is always preferred but is too infrequently accomplished.
2. The temporary fencing requirement is appropriate and appreciated, as is the proposed data recovery at the historic trash deposit, SDI-16881.
3. Regarding the Hoskings Ranch Rural Landscape District, Appendix C, on page 75, recommends nomination to the California Register of Historical Resources and nomination the County's historical landmarks register. This recommendation has been omitted from the DEIR itself. The omission should be corrected. While the District falls in open space, County landmarking would ensure that any future actions involving it would come before the Historic Site Board, affording an opportunity to draw upon the expertise of the board members.
4. The wording of mitigation measure M-CR-1 in several locations in the DEIR (for example, on pages S-1-16, S-1-17 and 4-6) calls for monitoring "by an archaeologist and/or Native American representative". This needs to be corrected in all cases to say "and", not "and/or"

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5. Pages 77 and 79 of Appendix C include an alternative to curation of any cultural material recovered during the monitoring program, for repatriation to the Kumeyaay community. We note that this alternative does not appear to have been included in the DEIR, does not distinguish between material of historical and Native American origin, and that the statement is ambiguous in terms of who decides and which material is considered for repatriation. The clearest definitions relative to repatriation appear in the federal NAGPRA of 1990. These have been applied nationwide for over 20 years, and should continue to be the standard here as well.

5

Thank you for the opportunity to participate in the public review of this project's environmental documents.

Sincerely,


James W. Royle, Jr., Chairperson
Environmental Review Committee

cc: Affinis
SDCAS President
File

Hoskings Ranch: Draft Response to Comments

December 5, 2014

Letter F: San Diego County Archaeological Society, Inc.

1. Comment noted.
2. Comment noted.
3. The County concurs with the comment. The County supports the recommendation that the Hoskings Rural Landscape District be nominated to the California Register of Historical Resources and the County's historical landmarks register. The recommendation has been added to the DEIR on page 2-35.
4. The County concurs with the comment. The wording in the DEIR has been revised to reflect the requirement that both an archaeologist and a Native American representative be present to monitor grading. Please see DEIR Sections 2.2.3, Cumulative Impacts, page 2-37; Section 2.2.5.1, Mitigation Measure M-CR-1, page 2-39; and 2.2.6, Conclusion, page 2-40.
5. The County concurs with the comment. The wording in the DEIR has been revised to include the following statement in Section 2.2.5.1 on page 2-39:
"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. Historical era cultural material collected will be curated."

ENDANGERED HABITATS LEAGUE

DEDICATED TO ECOSYSTEM PROTECTION AND SUSTAINABLE LAND USE



VIA ELECTRONIC MAIL

October 10, 2013

Dennis Campbell
dennis.campbell@sdcounty.ca.gov
Planning and Development Services
5510 Overland Ave. Suite 110
San Diego, CA 92123

RE: Hoskings Ranch TM (PDS2003 3100-5312, Log No. 3910-03-10-005)

Dear Mr. Campbell:

The Endangered Habitats League (EHL) is a regional conservation organization with members throughout Southern California, including San Diego County. We are a long term stakeholder in County planning efforts. EHL submits the following comments on behalf of itself and its members on the proposed DEIR and Habitat Loss Permit for the Hoskings Ranch Tentative Map (Project). For the reasons explained below, the DEIR for the Project does not meet minimum legal standards relating to the analysis of impacts and the development and analysis of alternatives.

The preferred Project encompasses 1,416.5 acres, of which 206.9 acres would be developed with residential pads and roads. Approximately 1,209.8 acres would be preserved as open space. The Proposed Project would subdivide the Project Site into 24 residential lots while purporting to remain within Williamson Act requirements. The land is most suitable for grazing, with agricultural acreage averaging 17.7 acres per lot. It is perhaps more than a coincidence that the anticipated density of cattle for the site has also been calculated exactly 17.7 acres per head. New owners will have the option to discontinue participation in grazing with appropriate notice, and homeowners can fence residential areas within the development area as desired.

The DEIR acknowledges that the entire 1,416 acre Project site contains sensitive habitat (DEIR at p. 2-1), with Southern Mixed Chaparral, Chamise Chaparral, Coastal Sage Scrub, a variety of Oak Woodland types, riparian resources, and Montane Meadow. Especially in the western end of the Project site, the land is largely intact and borders land permanently conserved as National Forest. (See October 7, 2013 letter to Dennis Campbell from Biologist Jerre Stallcup, Conservation Biology Institute and attached map, submitted concurrently.) Fragmentation of this portion of the Project site through

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residential parcelization therefore has the potential to impact not only onsite Project resources, but also adjacent conserved lands, particularly as it relates to indirect impacts on raptor foraging and breeding areas.

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As the above-referenced map also indicates, the eastern border of the Project site already is relatively parcelized. Specifically, scattered large residential lots and agricultural operations ranging in size from two to 50 acres are located east of the site. The area directly south of the eastern portion of Hoskings Ranch consists of small-scale agricultural and residential lots ranging in size from four to 120 acres. The proposed lot configuration for the Project ignores these distinctions between the western and eastern parts of the Project site, spreading 24 rural residential estate lots spanning from the eastern to the western borders of the site.

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Stated project objectives are as follows:

1. Provide a subdivision that maintains the integrity of the current Williamson Act contract by continuing agricultural use on the site.
2. Preserve the rural character of the area by providing large lots that are consistent with the Julian Community Character.
3. Provide for preservation of the Project Site's significant environmental resources, including biological habitats and rare species, archaeological sites, Orinoco/Temescal Canyon Creek, and landform features such as steep slopes and grasslands.
4. Provide appropriate infrastructure so that the Proposed Project would not adversely impact community resources.
5. Provide the community with needed public facilities by dedicating land along SR 78/79 to the Julian/Cuyamaca Fire Protection District (JCFPD).

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EHL believes that the Project does not meet all these stated objectives—specifically the objectives of maintaining Williamson Act status for as much of the land as is feasible and preserving the site's environmental resources—as well as a true clustered design, an alternative that was not developed in the DEIR. A true clustered design would keep the open space character of the western portion of the property intact—consistent with surrounding conservation lands—thereby reducing harmful habitat fragmentation.

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Although the DEIR asserts that no significant biological impacts would result from Project implementation, this conclusion is premised on an analysis that completely

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ignored the obligation to address the on-site and cumulative impacts of habitat fragmentation and related edge effects. (See Stallcup Letter, submitted concurrently, at p. 1.) The DEIR acknowledges potentially significant impacts to sensitive raptors, such as Golden Eagle and Swainson's Hawk, to a host of County-designated sensitive species, and to the viability of a core wildlife area greater than 500 acres in size. (See DEIR, at p. 2-6.) For all these impacts and proposed mitigation, the DEIR relies upon *simple numerical percentages or ratios* absent any meaningful discussion of configuration. The resulting functionality of the fragmented and edge-impacted habitat relative to its baseline condition without residential estate lot uses is undetermined.¹ This failure to consider configuration is particularly critical because many of the lots in the western side of the Project extend into intact areas, which are in turn adjacent to the Cleveland National Forest.

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Cont.

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A true clustered design would also ensure that the overwhelming majority of the land would not be parcelized and thus remain clearly viable for commercial scale grazing while keeping the developed parcels sufficiently large to preserve the area's rural character. By contrast, the 24 lots the Project proposes cannot be squared with Williamson Act contract standards, thereby violating Government Code §66474.4.

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This Subdivision Map Act statute prohibits the creation of residential subdivisions on Williamson Act land where the resulting parcels are too small to sustain commercial agriculture or where, as is the case here, residential development is the primary purpose of the subdivision and not merely incidental to the commercial agricultural use of the land. The statute is clear that *the resulting parcels* from a subdivision must independently support commercial agriculture and that residences are allowed only if they are directly related to existing agricultural uses.² Hypothetical agricultural uses,

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¹ An example of a conclusion of insubstantial adverse effect based wholly on gross percentage is found on page 2-9: "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 project preserves 85 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 8 is not exceeded, impacts are less than significant, and no mitigation is required."

² Cal. Gov't. Code §66474.4, subdivision (a) provides that "[t]he legislative body of a city or county shall deny approval of a tentative map, or a parcel map for which a tentative map was not required, if it finds that either *the resulting parcels* following a subdivision of that land would be

such as the speculative prospect of vineyards and orchards discussed in the DEIR, are irrelevant.³

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Applying this legal standard, it is obvious that the Board cannot make the required findings under Government Code §66474.4. First, the resulting parcels can support a stock load of an average one head of cattle. Some parcels, such as Parcels 12, 15, 16 and 20 cannot even support one animal. This is manifestly too small to sustain a commercial grazing operation. It makes no difference that avocado, citrus, pears or vineyards can be farmed on parcels that size, because that is not an existing or even necessarily viable use.

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Second, the proposed residences are not to house cowhands or ranchers, but rather are intended for individuals seeking to enjoy “country” amenities while commuting elsewhere for their livelihoods. Indeed, landowners are anticipated to fence themselves off from any agricultural activity. These houses will be built, marketed and sold regardless of whether active commercial agriculture occurs on the land. This is thus a textbook case of where the “subdivision will result in residential development not incidental to the commercial agricultural use of the land.” (Cal. Gov’t. Code §66474.4, subd (a).) The proposed project thus not only does not meet a key Project objective identified in the DEIR, but it is also illegal.

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Perhaps anticipating problems with legality of the Project under the Subdivision Map Act, the DEIR identifies an alternative configuration, misleadingly named the “Consolidated Project Alternative,” but which at least acknowledges the fundamental incompatibility between rural residential subdivision marketed to retirees and commuters and commercially active agricultural land under a Williamson Act contract. The Consolidated Project Alternative (CPA) proposes not just 24, but for some unexplained reason an additional 10 homes totaling 34 lots focused in the eastern and north central part of the site. Far from being a true “consolidated” design, lot sizes would vary from 11.8 to 709.3 acres, although average lot size would remain 40 acres. Most of the lots in the CPA range in acreage from the high teens and low twenties to over 30 acres.

14

too small to sustain their agricultural use or the subdivision will result in residential development not incidental to the commercial agricultural use of the land.” (Emphasis added.)

³ See Cal. Dept. of Conservation Williamson Act analysis at <http://conservation.ca.gov/dlrp/lca/Documents/WA%20Workshop%20Presentations%201109.pdf>

Again, this alternative fails to meet Project objectives as well as a true clustered design. For example, as for the objective of preserving the Project Site's significant environmental resources, including biological habitats and rare species, the CPA still creates significant fragmentation, especially in the western half of the site. Indeed, biologist Jerre Stallcup concludes that "the Project Alternative Map 34-lot project provides no greater benefit for open space conservation than the proposed Map 24-lot project." The DEIR similarly concludes that "[t]he CPA has similar impacts to biology when compared to the proposed project." (DEIR at p. 4-29.)

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Cont.

The simple fact is that the DEIR fails to develop and analyze a reasonable range of alternatives that would better meet stated Project objectives. "A major function of an EIR 'is to ensure that *all* reasonable alternatives to proposed projects are thoroughly assessed by the responsible official.'" (*Save Round Valley Alliance v. County of Inyo* (2007) 157 Cal. App. 4th 1437, 1456, citations omitted.) "One of [an EIR's] major functions . . . is to ensure that all reasonable alternatives to proposed projects are thoroughly assessed by the responsible official." (*Wildlife Alive v. Chickering* (1976) 18 Cal.3d 190, 197.) Reasonable alternatives should only be eliminated from consideration in the EIR if the alternative would not meet most of the basic project objectives, is infeasible, or it would not avoid significant environmental impacts. (CEQA Guidelines § 15126.6(c).)

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For example, the DEIR failed to analyze a true clustered alternative (lots from 5-10 acres consistent with adjacent parcels to the west), keeping the unit count the same at 24 units—a unit yield that is concededly economically viable because the proposed Project yields the same. If, for example, 8-acre lots were used consistent with the zoning designation for the land under the historic General Plan (the TM application is pipelined), the rural character of the area would be preserved and well over 1200 acres of the site would remain under Williamson Act contract and remain intact for habitat. It would also be easier to supply with infrastructure, create less of a burden on public services such as fire and police, and would be much easier to protect from the intense wildfires that have devastated the area in recent years.

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In short, a true clustered alternative would better meet all project purposes than either the Project or the CPA, with less environmental damage. It therefore must be considered and cannot be rejected unless the County can make findings of infeasibility. The analysis that CEQA requires is a means to a substantive goal. "The purpose of CEQA is not to generate paper," one court has observed, "but to compel government at all levels to make decisions with environmental consequences in mind." (*Citizens of*

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Goleta Valley v. Board of Supervisors (1990) 52 Cal.3d 553, 564.) “CEQA contains a ‘substantive mandate’ requiring public agencies to refrain from approving projects with significant environmental effects if ‘there are feasible alternatives or mitigation measures’ that can substantially lessen or avoid those effects.” (*County of San Diego v. Grossmont-Cuyamaca Cmty. Coll. Dist.* (2006) 141 Cal. App. 4th 86, 98.)

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Cont.

If the Project’s significant impacts on biological resources are acknowledged—as they must be—then a lead agency must make two sets of findings. The first must address how the agency responds to significant effects identified in the environmental review process, either by finding that these effects will be mitigated, or that “[s]pecific economic, legal, technological, or other considerations . . . make *infeasible* the mitigation measures or project alternatives identified in the final EIR.” (CEQA Guidelines § 15091, subd. (a)(3).) The second set concerns any statement of overriding considerations, permitting an agency to approve a project despite the existence of significant environmental impacts. (CEQA Guidelines, § 15093.) Because the findings requirements implement CEQA’s substantive mandate that public agencies refrain from approving projects with significant environmental impacts when there are feasible alternatives or mitigation measures that can lessen or avoid these impacts, an agency is prohibited from reaching the second set until it has properly addressed the first. (See CEQA Guidelines, § 15091, subd. (f), subd. (c); *Mountain Lion Foundation v. Fish & Game Commission* (1997) 16 Cal. 4th 105, 134.)

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These findings must be supported by substantial evidence in the record. (Pub. Res. Code § 21081.5; CEQA Guidelines, § 15091, subd. (b).) Any finding that an alternative is infeasible must not only reflect a reasoned analysis, but must be based on specific and concrete evidence. For example, in *Citizens of Goleta Valley v. Board of Supervisors* (1988) 197 Cal.App.3d 1167, the court rejected a finding of infeasibility of alternatives based on conclusory assertions of unacceptable cost, noting that:

“The fact that an alternative may be more expensive or less profitable is not sufficient to show that the alternative is financially infeasible. What is required is *evidence* that the additional costs or lost profitability are sufficiently severe as to render it impractical to proceed with the project.” (Id. at p. 1181.)

Only if this finding of infeasibility can properly be made may a lead agency rely on a statement of overriding considerations.

Taken collectively, these principles mandate that the County require the good-faith development of a true clustered alternative along the lines suggested in these

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Dennis Campbell, DPDS
EHL on Hoskings Ranch DEIR
October 10, 2013
Page 7

comments. This alternative must then be weighed against the other alternatives developed, using relative environmental harm and the project objectives as benchmarks. If, as EHL believes to be the case, a true clustered alternative best meets project objectives in a feasible manner at a minimum environmental cost, the County is bound under CEQA to require its adoption.

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Cont.**

Thank you for considering EHL's views.

Very truly yours,



Dan Silver, MD
Executive Director

Hoskings Ranch: Response to Comments

Reviewed October 7, 2015

Letter G: Endangered Habitats League

1. The introductory comments are noted. The County disagrees that the DEIR “does not meet the minimum legal standards.” The DEIR analyzed all potential impacts and provides a reasonable range of alternatives. Details are discussed in response to the comments below.

The comment compares the average acres of grazing available on each lot with the average area required to support one cow on the site. These two numbers are not related. The Proposed Project is designed to allow grazing over most open space areas, encompassing approximately 930 acres when fenced areas along Temescal Creek, major drainages, and around sensitive plant species and sensitive habitat areas are subtracted. Disallowing steep slopes, the prime grazing areas consist conservatively of approximately 435 acres. This number excludes sensitive areas that will be fenced, and areas that are remote or too steep. Using an acre of grazing per lot measure is misleading because the actual grazing area will vary by time of year, climatic conditions, and levels of grazing vegetation available, among other factors.

The site has been assessed as having a carrying capacity of approximately 80 head of cattle by local ranchers with extensive grazing management experience on adjacent or nearby properties. This amounts to an average of 17.7 acres per single head of cattle, over the entire site. This number was used to provide the reader with a measure for understating the carrying capacity of the site, but it is not useful for estimating how many head any given lot on the site can support. The average agricultural acreage per lot and the average acres needed to support one head are not related.

2. The Proposed Project has been designed to avoid habitat fragmentation and negative effects on adjacent sensitive lands. Development areas in the west are restricted to areas along the northern boundary, where there is already a paved 24 foot wide road and adjacent offsite development. Property owners will be advised of the open space easement and its restrictions prior to purchase of any lot. Each lot will have some open space component that will be united by easement into a single large (1,214.8-acre) open space area. A Habitat Management Plan (HMP) will add ongoing protections to the open space area and will provide a means to manage and monitor the open space as a whole, in perpetuity. These protections will include patrolling and monitoring of habitat integrity, specific tasks to assess and remediate any intrusions or encroachments, removal of noxious invasives, regular agency reporting, and an operating budget. While the Proposed Project remains under a Williamson Act contract, a Conservation Grazing Management Plan

(CGMP) will be in place to assess the effects of grazing and will provide for the adjustment of grazing intensity if negative effects are found. Where development occurs on the western end of the property, the habitat is not fragmented with this design. Narrow “fingers” of habitat have been minimized and a minimum of 400 feet between development nodes has been maintained. The western boundary is, indeed, adjacent to conserved lands, as noted in the comment, and for this reason this area is being entirely preserved in open space and will not be developed. Additionally, onsite stretches of Temescal and Orinoco Creek will remain in open space and will be protected by a conservation easement, a 200 foot biological buffer, and cattle-exclusionary fencing with signage. As a result, off-site conserved lands to the west will be adjacent to onsite open space, preserving connectivity and large blocks of habitat.

Raptor foraging habitat is impacted by the Proposed Project, estimated at approximately 207 acres. However, all 1,214.8 acres of open space will remain suitable for raptor foraging. Grazing will occur in the raptor foraging area, although grazing and raptor foraging are not exclusionary activities.

3. The County acknowledges the comment. The Proposed Project takes into account differences between the existing conditions in the eastern and western parts of the site. Development has been focused in the eastern part of the site, where as the comment notes, existing offsite development is most intense. Fifteen of the 24 lots are focused in this area. Higher densities in the eastern area are constrained by the need to preserve sensitive habitats such as Montane Meadow, and sensitive plants such as the San Diego Milk-vetch, San Diego Gumplant, Cuyamaca (Parish’s) Meadowfoam, and Velvety False Lupine. All of these occur on the eastern side of the property. Densities are much lower in the west, where development has been focused along developed roadways adjacent to already subdivided lands. The more sensitive areas in the west, specifically the western boundary, Daley Flat, Temescal Creek, and adjoining major drainages, will be retained entirely in open space. The Proposed Project has taken a balanced and nuanced approach to existing conditions in both the east and west.

4. The County acknowledges the comment. The Williamson Act contract provisions are met because the Proposed Project maintains 40 acre lots and continues the required agricultural activity, cattle grazing/breeding. The project therefore meets the objective of preserving the provisions and integrity of the Williamson Act contract. The open space design and protections are discussed in Response 2 above. The Proposed Project preserves 1,214.8 acres, 85 percent of the site, in protected and managed biological open space. Due to its design and extent, and the low density of development, as

well as ongoing management, the Proposed Project meets the objective of preserving the site's environmental resources.

5. The County acknowledges the comment. The current design keeps the open space areas in the west intact and avoids habitat fragmentation as much as possible while retaining the desired rural character and avoiding sensitive resources, as detailed in responses 2 and 3. A more tightly clustered design would not therefore provide additional open space advantages that have not already been taken into account.

6. The County acknowledges the comment. The DEIR biological summary and technical report call out several significant biological effects. These are BI -1 through BI-14, noted on DEIR pages 2-25 through 2-27. Habitat fragmentation and edge effects were assessed in Sections 2.1.2.1, 2.1.2.2, 2.1.2.3, and 2.1.2.4 of the DEIR. The Proposed Project fully mitigates its biological impacts through a program of open space design, management and monitoring, fencing, and seasonal grading restrictions, as detailed in mitigation measures M-BI-1 through M-BI-5 and M-BI-7 on pages 2-27 through 2-31. These measures include mitigation for edge effects that include buffers, fencing and signage, patrols, reporting, and provision for timely remedial action if effects are noted.

7. The County appreciates the comment. The integrity and effectiveness of the open space is discussed in detail in Response 2. The Proposed Project open space has been designed to provide biological protections for specific species, as well as the core area and raptors. Therefore, percentages are an important tool to illustrate how the open space design will effectively protect given species. The analysis of how the open space protects specific sensitive species discusses several features: avoidance of the most critical areas of their habitats, development design to focus away from critical areas, fencing and signage as needed, and extensive management of the open space. Details are provided in the biological technical analysis (Appendix A), sections 3.0 through 7.0, beginning on page 48 and in the DEIR, where the impact analysis is on pages 2-6 through 2-21. Five focused discussions are provided. These are special status species, riparian habitats, federal jurisdictional wetlands and waterways, wildlife movement and nursery sites, and local policies, ordinances, and adopted plants. Page 2-7 notes that “direct and indirect impacts [to special status species] would not affect the regional long-term survival of any of these species because ample habitat that supports these species is preserved on site and in the region.” Protections are focused

on both project-level and regional preservation of species, which is reflected in the RMP that calls for an ongoing program of species and habitat surveys, reporting, and adaptive management. The development area in the far west of the site (lots 23 and 24) is limited approximately 15 acres. No development is closer than 800 feet to any offsite area, preserved or subdivided. Distances from lot 24, the western-most lot, are approximately 1,200 feet from the western boundary with a grade separation of 650+ feet. The entire intervening area between the lot 24 pad and the western boundary will be in conserved open space. Offsite preserved areas are protected with this design, as detailed in responses 2 and 3 above.

The Proposed Project design creates a large (1,214.8 acre) open space area across the entire site, as called for in the comment. Although each lot is at least 40 acres in size, the development area is on average 8.6 acres per lot, with the remaining portion preserved in open space. The open space will be protected, monitored, and managed in perpetuity in order to maintain habitat vigor and species diversity. Property owners will be advised of the open space easement as described in Response 2.

8. The Proposed Project proposes a joint grazing/cattle breeding operation to be operated and managed by local professional ranchers with extensive experience in the field of cattle raising and range management. Additionally the 1,214.8-acre open space area will meet a goal of the Williamson Act of preserving open rangeland. The Proposed Project will meet the requirements of the Williamson Act contract by maintaining minimum 40 acres lots, continuing grazing, and maintaining 85 percent of the site as open, undisturbed land, most of which will be grazed.

9. The County appreciates the comment. A joint grazing/cattle breeding program will be in effect when lots are sold and will include all lots in the Proposed Project. Should a lot owner opt out, they will be required to maintain their own grazing/cattle breeding in the open space area, implement an agricultural use within their development area, and/or give notice of withdrawal from the Williamson Act contract for their property. Only grazing/cattle breeding will be allowed in the open space area. Forty acre lots are acceptable under the Williamson Act for continuation of agriculture according to the California Department of Conservation and County of San Diego policy. Available grazing land on some individual lots is limited but those limitations vary with factors such as climate, topography, seasons, rainfall, and other factors. For example a lot that may seem to have limited capacity for grazing could accommodate more cattle in years when conditions are particularly favorable to the grasses that grow on that lot. Lots are also able to accommodate other types of agriculture in their development areas, as demonstrated in the *Lot By Lot Analysis* (Appendix G of the DEIR) conducted for the Proposed Project.

The analysis discussed how these types of operations can be small in scale but still commercially viable.

10. The County acknowledges the comment. Vineyards and orchards are not used to support the argument that there is a viable agricultural use on the site. This argument rests on the continuation of grazing/cattle breeding on the site.

11. The County acknowledges the comment. There is adequate grazing area on all lots in the proposed subdivision. Grazing is a dynamic process not a static process. The cattle will not be limited to any one lot but will move over the entire site because joint grazing will be used. At any given time, a lot may support no cattle or as many head as can be grazed based on the available forage. Factors of climate, rainfall, management considerations, the results of biological monitoring, the location of drop points for hay in winter, and other factors all contribute to a variation in the number of head supported on a lot at a given point. The use of an averaged area of agriculture on each lot is not an accurate way to assess agricultural capacity because of the number of variables at play in the course of a grazing season.

12. The County acknowledges the comment. The Proposed Project anticipates residents who want to be part of an ongoing agricultural activity and who appreciate the rural feel of such a setting. They will be able to participate in the operation without day to day involvement, as might be dictated by a gentleman farmer model. As such they may be retired, may work elsewhere, or may pursue additional agricultural activities within their development area. The important point is to preserve open space and agriculture and the rural feeling of the area, which the Proposed Project accomplishes. Residents will have the option to fence their development area from the grazing area, as needed.

13. The County acknowledges the comment. The Proposed Project is not a standard subdivision where agricultural uses are completely eliminated in favor of other uses. Agriculture will be in place on the site when lots are sold, and will continue unless a lot owner opts out of the Williamson Act contract. If a lot owner opts out, the open space on his or her lot will revert to exclusively

biological open space and no further use of the open space area will be allowed. As such the lot will continue to meet a Williamson Act goal of preserving open land for future generations. State law and County policy has deemed 40 acre lots acceptable for grazing under a Williamson Act contract. This requirement is attained with the proposed design. The Proposed Project as proposed preserves the provisions of the Williamson Act because it provides 40 acre lots, active agriculture, and mandates the continuation of agriculture for the duration of the contract term and it therefore is not illegal.

14. The County acknowledges the comment. The Consolidated Project Alternative (CPA) is provided in order to adhere to the CEQA Guidelines requirement to provide a range of designs, not in response to a perceived inadequacy in the Proposed Project design. Ten additional lots were proposed in the CPA to compensate for the need to pay 12.5 percent of the assessed value of the property in order to immediately terminate the Williamson Act contract. Termination is necessary in order to provide lots smaller than 40 acres. Smaller lots are a key feature of the CPA and it cannot be accomplished without this termination. The CPA provides lots ranging from 11.85 up to 709.3 acres, as noted in the comment, with 26 small to medium sized lots in the east and 8 larger lots in the west. The intent is to demonstrate the effects of a realistic clustered approach on the east, taking into account community character and biological constraints and respecting Julian Planning Group opinions about clustering. The community has expressed support for the Proposed Project, finding the “cluster of ten to fifteen acre parcels to be unacceptable.” True clustering would require lots below the minimum allowed lot size of 8 acres. These lot sizes would be even more inconsistent with the community’s expressed standard and thus would make attaining basic project objectives impossible.

The CPA, on the other hand, effectively shows that a consolidated approach is feasible. It demonstrates, for example, that even with additional lots, a CPA approach can provide more open space than the Proposed Project. The CPA reduced lots in the west by one, and moves lots closer to the existing development area on the north and northwest. It also reduces development intensity in the west by moving lots east away from proximity to the western boundary, and reduced the development area of lot 34.

Clustering is not a project objective. See DEIR Chapter 1, page 1-1. All Proposed Project objectives such as preserving rural character and environmental conservation are met. Neither the Proposed Project nor the CPA produce habitat fragmentation. This is particularly clear when viewing a map showing the open space areas on the site (Figures 2-1-5 of the DEIR).

The CPA maintains a minimum of 800 feet of separation between the development area on Lot 34 and the site boundary to the north. Distance from the western boundary which is a focus of some comments here, is a minimum of 2,400 feet (0.45 mile). Additionally the CPA respects the design criterion of avoiding all development along the western boundary of the site. The biological impacts of the Proposed Project and the CPA look similar but are reduced in several ways. The CPA slightly reduces biological impacts by preserving an additional 7.1 acres in open space. One lot in the sensitive western areas is eliminated, and south-trending development nodes have been reduced from six to four, thereby expanding the unobstructed open space areas.

15. The County acknowledges the comment. A reasonable range of alternatives has been presented. The CPA discusses an approach with smaller lots in the east, where existing development is most prominent. For the reasons discussed in response to comment 14 above, it provided a realistic and attainable design. Other alternatives demonstrate what would occur if no development were to occur. The No Development Alternative (NDA) analyzes a situation where no change to existing conditions is anticipated. The No Project/Legal Lots Alternative (NPLL) analyzes effects if a small level of development (4 lots) were to occur. The Reduced Project Alternative (RPA) examines effects if density was reduced by 50 percent and the remaining 14 lots were made larger. Thus a range of lot numbers is provided (0, 4, 14, 24 (the Proposed Project) and 34). Alternatives include both continuation of the Williamson Act contract (NDA, NPLL, and RPA) and its termination (CPA). All alternatives reduce Proposed Project effects in at least two areas. As such the DEIR presents a reasonable range of alternatives as required by the CEQA Guidelines.

16. The County acknowledges the comment. The CPA presents a feasible approach to a true clustered alternative. Clustering to 8 acres and reducing the lot count to 24 is not economically feasible due to the need to terminate the Williamson Act contract, which requires payment of 12.5 percent of the assessed property value, as discussed in response to comment 14 above. It is not in keeping with the character of the area, as expressed strongly by the Julian Planning Group and by planning documents such as the new General Plan, which has revised the designation in this area to RL-40, or a minimum lot size of 40 acres. The rural character would be compromised by this approach. A clustering of 24 lots on 8 acres would create a development area of 192 acres, a savings of 14.8 acres, or 1 percent of the total site area over the Proposed Project. The additional 14.8 acres would be of benefit to the western areas of the site, but a detailed analysis has shown that the current CPA and Proposed Project designs do not compromise this area. Further, clustering would be focused in an area where large areas of sensitive habitats

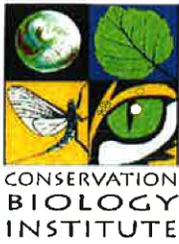
such as Montane Meadow, extensive drainages, and most of the rare plants on the site occur. The clustered approach thus complicates the issues of direct impacts to sensitive species, impacts to drainages, and concentrates edge effects in a more sensitive area, without providing clearly superior environmental benefits elsewhere on the site. The CPA addresses all of these concerns and represents a better approach to development than clustering on 8 acre lots.

17. The County acknowledges the comment. A more densely clustered project would not meet Proposed Project goals and would not attain a meaningful reduction in environmental damage, as discussed in detail in the response to comment 16.

18. The County acknowledges that Findings for the Proposed Project are required. Findings for the Proposed Project are well supported by the facts presented in the DEIR and the record, including a reasonable range of alternatives and facts justifying the infeasibility of a clustered 8-acre minimum lot size alternative. Please see response to comment 16 above.

19. The DEIR concluded all significant environmental impacts would be mitigated to less than significant. Therefore, no overriding considerations are required for this Proposed Project. The Proposed Project and the range of alternatives fully mitigate their impacts. A number of reasons that a true clustered alternative is infeasible are presented in the response to comment 16. The EIR does not include profitability as a reason to reject the alternative.

20. The County acknowledges the request for analysis of a new alternative based on clustering to eight acre lots. Such an alternative is not needed because it could not be feasibly attained, could create additional environmental impacts, and would not provide significant new information about the Proposed Project that is not already provided by the alternatives that have been selected.



Conservation Biology Institute

651 Cornish Drive
Encinitas, California 92024
(760) 634-1590

www.consbio.org

9 October 2013

Mr. Dennis Campbell
Dept. of Planning and Development Services
5510 Overland Ave, Suite 110
San Diego, CA 92123

RE: Hoskings Ranch Tentative Map 5312

Dear Mr. Campbell:

The Conservation Biology Institute is a 501(c)(3) organization that provides science support for habitat conservation efforts. Our staff has played a major role in the habitat conservation programs in San Diego County, both in conservation planning and in implementation (i.e., habitat management and monitoring). I have reviewed the map for the subject property and have the following comments.

Section 2.1 (Biology) of the Draft Environmental Impact (DEIR) Report for the subject project evaluates impacts according to 10 guidelines for determining the significance of impacts. Guideline 8 states: "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 analysis states: "The 1,416.8-acre Hoskings Ranch 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." However, the DEIR concludes that impacts are less than significant because the project conserves 85% of the property in open space. The DEIR does not analyze the onsite and cumulative impacts of fragmentation and edge effects on the proposed open space and on the various sensitive species in the area, including the golden eagle and other raptors. Moreover, the Project Alternative Map 34-lot project provides no greater benefit for open space conservation than the proposed Map 24-lot project.

A true environmentally superior alternative would provide more clustering of lots in an area closest to existing infrastructure and would, in turn, consolidate the open space close to other regionally conserved lands. In fact, the document does not analyze the project with respect to conserved lands in the surrounding area (see attached map), and both project designs place lots near the existing conservation easements. Consolidating open space on the property would not only enhance the value

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of the open space in the San Diego River gorge, but would also maximize the value of the Hoskins conserved open space on existing onsite conservation easements.

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I believe the applicant should analyze a true project alternative that considers more clustering of lots and more consolidation of open space, with respect to existing land use in the region.

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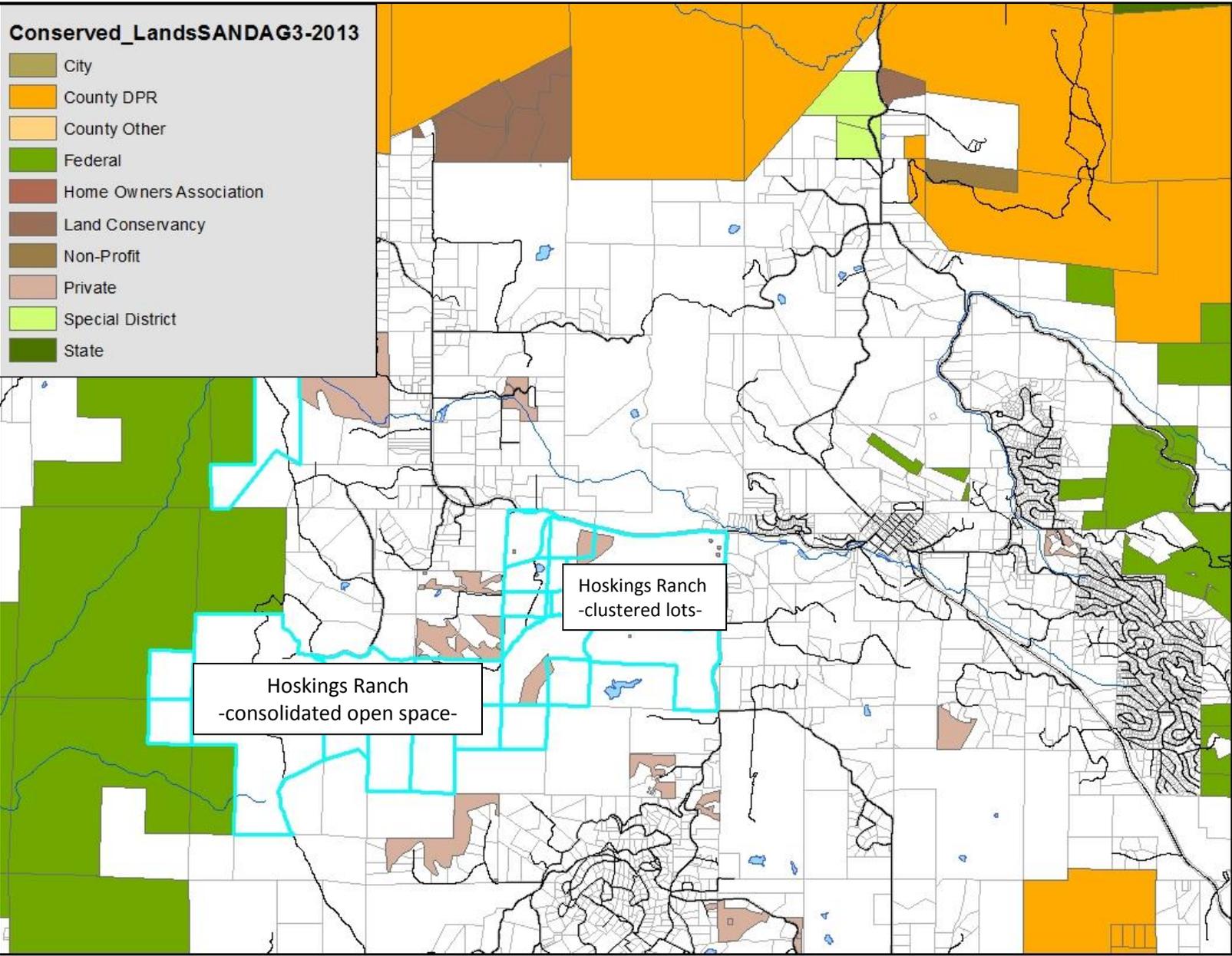
Sincerely,



Jerre Ann Stallcup
Conservation Ecologist

Conserved_LandsSANDAG3-2013

- City
- County DPR
- County Other
- Federal
- Home Owners Association
- Land Conservancy
- Non-Profit
- Private
- Special District
- State



Hoskings Ranch: Draft Response to Comments

December 5, 2014

Letter H: Conservation Biology Institute

1. The County acknowledges that the DEIR states that the Proposed Project is in a core wildlife area. The DEIR states, "The Project has been designed to avoid impacts to 85 percent of this core wildlife area by preserving large blocks of generally contiguous habitat that encompasses many of the most biologically significant areas in 1,214.8 acres of managed biological open space easements (page 2-9)." Furthermore the technical study for the Proposed Project states (page 51):

The Proposed Project has been designed to avoid impacts to 85% of this core wildlife area by preserving large blocks of generally contiguous habitat that encompasses many of the most biologically significant areas in 1,214.8 acres of managed biological open space easements. County guideline 3.1.H 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 Proposed Project preserves 85% of the Hoskings Ranch core wildlife area in a design that effectively avoids habitat fragmentation, provides large blocks of habitat, and retains the integrity of the core wildlife area, County policy as defined in the Guidelines for Determining Significance - Biological Resources indicates that impacts are less than significant.

2. The County acknowledges the comment. The DEIR provides detailed analyses of the effects of fragmentation, noise and other edge effects, corridor widths and habitat blocks, and visual continuity, starting of page 2-9 (noise, edge effects), 2-12 (edge effects), 2-14 (edge effects), 2-15-16 (corridors), connectivity and habitat blocks) . These discussions are based on a full biological report and numerous focused surveys that were done for the project (DEIR Appendix A). Mitigation and design considerations for significant effects are provided in DEIR Section 2.1.5 starting on page 2-27.
3. The County acknowledges the comment. The 34 lot project provides a small amount of additional open space (7.1 acres) but also provided additional biological benefits. The CPA reduces development in the west by one lot and moves one lot to the east away from the western boundary where sensitive lands are located. The development area of the western most lot has been reduced. And south-trending development nodes have been reduced from six to four, thereby expanding the unobstructed open space areas in the south along Temescal Creek. As such it provides a larger block of open space in the central and western part of the site. ~~In addition, grazing would be reduced from 930~~

~~acres in the Proposed Project to 709 acres on one lot in the CPA.~~ The CPA therefore has significantly fewer biological impacts than the proposed project.

4. The County acknowledges the comment. A clustering of small lots in the east was determined to be inconsistent with the character of the Julian area and the agricultural nature of the Proposed Project. It could also have additional biological impacts due to the sensitivity of some eastern areas. Clustering to 8 acres and reducing the lot count to 24 is not economically feasible due to the need to terminate the Williamson Act contract, as discussed in response to comment 14 above. It is not in keeping with the character of the area, as expressed strongly by the Julian Planning Group and by planning documents such as the new General Plan, which has revised the minimum lot size in this area from eight to 40 acres. The rural character would be compromised by this approach. A clustering of 24 lots on 8 acres would create a development area of 192 acres, a reduction of 14.8 acres, or 1 percent of the total site area over the Proposed Project. The additional 14.8 acres could be of benefit to the western areas of the site, but a detailed analysis has shown that the current CPA and proposed Proposed Project designs do not compromise the biological resources in this area. Further, clustering would be focused in an area where large areas of sensitive habitats such as Montane Meadow, extensive drainages, and most of the rare plants on the site occur. The clustered approach thus complicates the issues of direct impacts to sensitive species, impacts to drainages, edge effects due to higher density, without providing clearly superior environmental benefits elsewhere on the site. The CPA addresses all of these concerns and represents a better approach to development than clustering to 8 acres because the CPA provides a superior biological design and is closer to the character of the area because it avoids small lots and disperses homes in a fashion similar to surrounding uses.
5. The County acknowledges the comment. The Proposed Project's connectivity with conserved lands offsite is analyzed in the DEIR. See Section 2.1.2.4, Wildlife Movement and Nursery Sites, Guidelines 2, 3, 5 and 6; and Section 2.1.2.5, Local Policies Ordinances, and Adopted Plans, Guideline 2. Note that the proposed Upper San Diego River Recommended Wilderness Area is off site to the west. The entire western boundary of the -site has been retained in protected open space, providing continuity and protection for this area. While lot lines extend to the western boundary, an open space easement, fencing and signage as needed, and monitoring and maintenance plan ensure that this area will remain in open space. No changes to the DEIR are needed as a result of the comment.
6. The County acknowledges the comment. A clustering alternative is discussed in detail in response to comment 4 above. The response indicates that a true clustered alternative is not feasible. No changes to the DEIR are needed as a result of the comment.

From: Cindy Buxton [mailto:iokuok2@hotmail.com]
Sent: Tuesday, November 12, 2013 12:38 AM
To: Campbell, Dennis
Cc: Will Metz; Rob Hutsel; Joan Friedlander; Molly Bigger; Bill Powers; donna tisdale; dsilverla@me.com
Subject: RE: PDS2003 3100-5312 (TM), LOG NO. 3910-03-10-005 (ER); HLP XX-XXX; SCH NO. 2003081154; HOSKINGS RANCH TENTATIVE MAP.

Oh, By the Way, SDG&E has proposed as part of their Master Permit renewal the use of a new wire or conductor that is one inch in diameter instead of the current 1/2 inch one. This new conductor is rated for high current instead of voltage. If this criteria materializes the current running through this line will be 5.5 times what it is now. The efficiency has not been disclosed as of yet though the question is outstanding. The temperature runs up to 270 from 190 at efficient capacity. This would be similar to living next to a traditional line with the capacity that of at least a 230 if not a 340 line. The Sunrise Powerlink by comparison was 500 and the two lines running underground in to Alpine were 230. This would have slightly different issues of a 5 fold increase in magnetic field interference on any communications device as well as any magnetic field health issues, and high amperage or current safety issues. The safety factor of running high current attached to a metal pole and electrocution issues have been raised in the public commenting. These would need to be disclosed to potential customers as well as commenters.

Sincerely,
Cindy Buxton
Chair Forest Committee, San Diego Sierra Club

1964 - 2014 Civil Rights 50 ~ Wilderness 50

From: iokuok2@hotmail.com
To: dennis.campbell@sdcounty.ca.gov
CC: wmetz@fs.fed.us; rhutsel@sandiegoriver.org; ifriedlander@fs.fed.us; cmbigger@cox.net; bill@borderpowerplants.org; donnatisdale@hughes.net
Subject: PDS2003 3100-5312 (TM), LOG NO. 3910-03-10-005 (ER); HLP XX-XXX; SCH NO. 2003081154; HOSKINGS RANCH TENTATIVE MAP.
Date: Mon, 11 Nov 2013 23:57:51 -0800

PDS2003 3100-5312 (TM), LOG NO. 3910-03-10-005 (ER); HLP XX-XXX; SCH NO. 2003081154; HOSKINGS RANCH TENTATIVE MAP.

Planning & Development Services (PDS), Project Processing Counter, 5510 Overland Avenue, Suite 110, San Diego, California 92123

Dear Mr Cambell

Somewhere I had the impression that the comments for the above project were due on November 10. I'm not sure now but I'm sending in my thoughts anyway. This project has been a while in the

making. I remember a notice sent by Anne Fege, the Forest Supervisor a decade ago sent back in 2003 or so.

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Since then I bumped into a mention of this area in the state RETI think tank on energy and global warming at their 2010 conference website. There was mention of an industrial scale wind farm at Daley Flat that was planned of some significant importance. Since then RETI morphed into BLM management and then onto the counties to carry out. Apparently this took another round appearing on the county wind ordinance proposal as a desirable but hardly top honors or very large area. Then on its heels- I believe it was even in the same county planning meeting that Michael Beck introduced an idea for a total community plan that included residential combined with a wind farm. Now I'm seeing Daley Flat back on the map as a residential with some doubts cast by Dan Silver-who was more or less tied at the hip with the all in one plan, -doubts about Williamson Act lands being treated like a residential community that would compromise the agriculture potential for a designated area.

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What I don't see in the project currently is any mention of a wind farm. If this is at all a possibility it HAS to be pointed out as a possible connected action. Even if this is to be smaller wind (hardly what was indicated by RETI, it should nevertheless be made very clear. I would not want to purchase a lot and then find out my neighbors were putting in a wind mill. These have proven very problematic in some places. I think if there is so much as two developers having coffee and musing over the possibility you MUST disclose that industrial wind is a possibility on this project. We have met a number of people claiming to be investors in wind at this very location so this has already happened and much more than just speculative. Again if this is true it has to be disclosed. It would be fraud to claim otherwise for sales and the environmental impacts are significant.

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Additionally I find any development of this area a shame. I would agree in part with the comments of the Endangered Habitats League. However I'm additionally surprised they are not all the more emphatic that this proposal is encroaching on wild areas in a very serious way. Anything near Orincco Creek should not be allowed. Anything near Temescal Creek should even more so not be allowed. The lots should not be extended all the way down into these watersheds. Where there is open space it should be exactly that, open space, not part of someone's property. Any transmission bringing power to this project should NOT be coming from the TL626!!! This I'm most emphatic about. This line has been most controversial and the worst fire hazard in all of Southern California. Please do not dignify anything that would further the need for this line. It should either be removed or combined into an undergrounded line on highway 79. The 626 runs through extremely dry and windy areas . It also runs through five units of the proposed Eagle Peak Wilderness. There is only one home trunked off from this line and there should not be others as the impacts from growing this line come with enormous hazards and impacts. Coming from Santa Ysabel substation you should find a route with less political baggage and much more reliability. If SDG&E is telling the truth about when they turn off this line anyone on this line is going to be attached to the highest wind hazard on the grid and the one most likely to be shut off for winds that occur 12 miles away weather they are at the Hoskins Ranch or not. Hence both residences and the environment would be far better off bringing in power another way.

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Lastly, RETI, and the County Wind Ordinance failed to inform the USFS of this project and the many unfolding project ideas. I don't know if the Forest Service will insists that you keep them informed

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but as a commenter, official or not as a person who is chronically thinking about this region on behalf of the public good I am insisting that you keep them abundantly informed. I would also like to be informed of anything new on this project as it occurs. I agree that the project clustering is not enough. I noticed that there is mention of a Hiking and Riding trail access on number "5" but the map was too small to find it. Please hang on to this easement. Please keep this project more to the north and east and as much away from Daley Flat, Orincco Creek and Temescal Canyon. Temescal Canyon is one of the most rugged unspoiled hidden corners of the San Diego watershed-though there are several this one is significant. It should be protected from any potential impact. I noticed that one of the versions of this proposal appeared to have lots coming down to the canyon. I am strongly opposed to allowing this as it touches some fragile exceedingly unique areas and an exceptionally significant Native American Archeological area.

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Frankly if it were my choice I do not think this development should happen at all, these lands would serve time much better as they are and should be turned over to the USFS for consistent management.

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I disagree with some of the plant community references to being undesirable. Particularly is that of California Sagebrush. You should not be encouraging developers to remove this as it is habitat for gnatcatchers a threatened species that was already hard hit after the Cedar Fire and is just beginning to recover. This is essentially suggesting the removal of critical habitat. There appears to be a significant presence of Engleman Oak and these too should be protected. I think you may also have some sensitive intermittently wet areas. These are sometimes uniquely adapted and should be avoided. All of these are additionally the result of cumulative impacts from fire and other pressures already upon the land. I am not clear that this was presented as such. Clearly a cluster of homes would have an impact, industrial scale wind placed on the remaining "open space" would be a near disaster for the area.

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Thank you for considering these comments in review of this project. Please include me in all future public releases of information and commenting requests on this project.

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Sincerely,
Cindy Buxton
Chair of the Forest Committee, San Diego Sierra Club

Hosking Ranch: Response to Comments

Reviewed October 4, 2015

Letter I: Sierra Club (Late Comment)

1. The County appreciates the comment but construction of new SDG&E facilities is not an issue for the DEIR for Hosking Ranch. The Proposed Project will receive power from SDG&E infrastructure in the area. The issue of new facilities is a matter for the utility and public regulatory agencies charged with overseeing it. No changes to the DEIR are needed in response to the comment.
2. Although the comment was received after the comment period ended, it is being included in the administrative record for the Proposed Project and the County is providing the following responses.
3. The Proposed Project does not propose a wind farm and the County is not aware of any proposed wind farms in proximity to the Proposed Project. It should be noted that the Daley Flat area mentioned in the comment is proposed to be biological and grazing open space, not residential uses, as the comment infers. Should the Proposed Project be approved, this area will be dedicated in perpetuity in open space and so development of a wind farm would be precluded. Regarding impacts to agriculture and compatibility of the Williamson Act, as stated in section 3.1.2 of the EIR, due to the size of the lots and several design measures, the Proposed Project would not result in any land use conflict with the Williamson Act.
4. Please see the response to comment 3 above.
5. The Proposed Project does not propose any development in Temescal Creek or Orinoco Creek. These areas will be protected in an open space easement, with fencing and signage used as needed to protect them. A 200 foot buffer is implemented to keep cattle and humans from encroaching into or near the creeks. The Endangered Habitats League commented on the Proposed Project. A detailed response to their comments is included as Letter H of the Response to Comments included in the Final EIR.
6. Individual lots are a minimum of 40 acres so as to be consistent with the Williamson Act contract currently in force on the site. As such the property lines extend to the creeks. However, this area will not be available to lot owners because it will be protected by an open space easement. Notification of potential owners as to this fact will be made a condition of the Proposed Project. Additional protections will include fencing and signage, and ongoing site patrols,

and a Resource Management Plan (RMP) that will require monitoring of habitats, reporting, and financial support to ensure monitoring continues. The Proposed Project provides adequate protection for open space and no changes to the DEIR are needed.

7. The Proposed Project will not use power from line TL626. Power will be supplied from existing infrastructure along SR 78/79 and Pine Hills Road.
8. The County acknowledges the comment and will include the San Diego Sierra Club on the distribution list for the Proposed Project. The U.S. Forest Service is also a commented on the DEIR and will receive these notifications.
9. The County acknowledges the comment. Clustering has been represented on the site through the Consolidated Project Alternative. The CPA presents a feasible approach to a true clustered alternative. Clustering to 8 acres and reducing the lot count to 24 is not economically feasible due to the need to terminate the Williamson Act contract, as discussed in response to comment 14 above. It is not in keeping with the character of the area, as expressed strongly by the Julian Planning Group and by planning documents such as the new General Plan, which has revised the minimum lot size in this area from eight to 40 acres. The rural character would be compromised by this approach. A clustering of 24 lots on 8 acres would create a development area of 192 acres, a savings of 14.8 acres, or 1 percent of the total site area over the Proposed Project. The additional 14.8 acres would be of benefit to the western areas of the site, but a detailed analysis has shown that the current CPA and proposed designs do not compromise this area. Further, clustering would be focused in an area where large areas of sensitive habitats such as Montane Meadow, extensive drainages, and most of the rare plants on the site occur. The clustered approach thus complicates the issues of direct impacts to sensitive species, impacts to drainages, edge effects due to higher density, without providing clearly superior environmental benefits elsewhere on the site. The CPA addresses all of these concerns and represents a better approach to development than clustering to 8 acres. It is not clear what the reference to a "Hiking and Riding trail on number "5"" is in reference to. There are no hiking or riding trails proposed in conjunction with the Proposed Project.
10. The County concurs with the comment. No development will be allowed in Daley Flat or along or near Temescal Creek and Orinoco Creek. The Proposed Project has been focused in the east, where 15 of 24 lots are located. Development also focuses on the northern ridge, with some lots extending in a southerly direction that are bordered by open space. No development area comes within 1000 feet of the creeks in the western parts of the site. Grazing will be allowed on Daley Flat and western areas of the site. Grazing will be subject to a Conservation

Grazing and Management Plan (CGMP) that will monitor grazing effects, ensure fences are in repair, and will adjust cattle placement in response to periodic habitat assessments. These protections will be adequate to protect sensitive locations on the site and no change to the DEIR is needed.

11. The County concurs with the comment. There was an earlier design that located four lots along the western boundary and in Daley Flat. The design has been dropped. No development will take place along the western boundary or in Daley Flat.
12. The County acknowledges the comment. Consistent management will be provided for open space areas through the RMP. Turning the site over to the Forest Service would not meet any of the Proposed Project goals.
13. The County acknowledges the comment about removal of California Sagebrush. The removal of sensitive habitat is discouraged by Federal, State and County laws, ordinances, and policies. The Proposed Project conforms to these laws and has been designed to avoid sensitive habitat whenever possible. California Gnatcatchers do not occur on the site so impacts to Diegan Coastal Sage Scrub (DCSS) will not impact this species. Of the 40.6 acres of DCSS on site, 3.8 acres are impacted and are mitigated on-site at a 2:1 ratio. Impacts are fully mitigated and no changes to the DEIR are required.
14. The County acknowledges the comment as related to protecting Engelmann Oaks and wetlands. Of the 246 acres of Engelmann Oak on the site, the Proposed Project impacts 45.9 acres. Although few trees will be removed, this area falls within development areas of the site and so is considered impacted. Mitigation consists of 131.1 acres of preservation at a ratio of 3:1 (6:1 for 2.0 acres of vacated open space). All total the site will preserve 201 acres of Engelmann oak on site. No wetland will be impacted. Impacts are fully mitigated or avoided and no changes to the DEIR are required as a result of the comment.
15. The County acknowledges the comment. Cumulative impacts were analyzed for the Proposed Project biology and were found to be not significant. The DEIR acknowledges the potential for impacts from the CPA. No wind farming is proposed, as detailed in the response to comment 3 above.
16. The County appreciates the comment. The Sierra Cluber will be included in all future releases of public information about the Proposed Project.



Regional Vicinity Map

Figure S-1

North
1" ~ 1770'

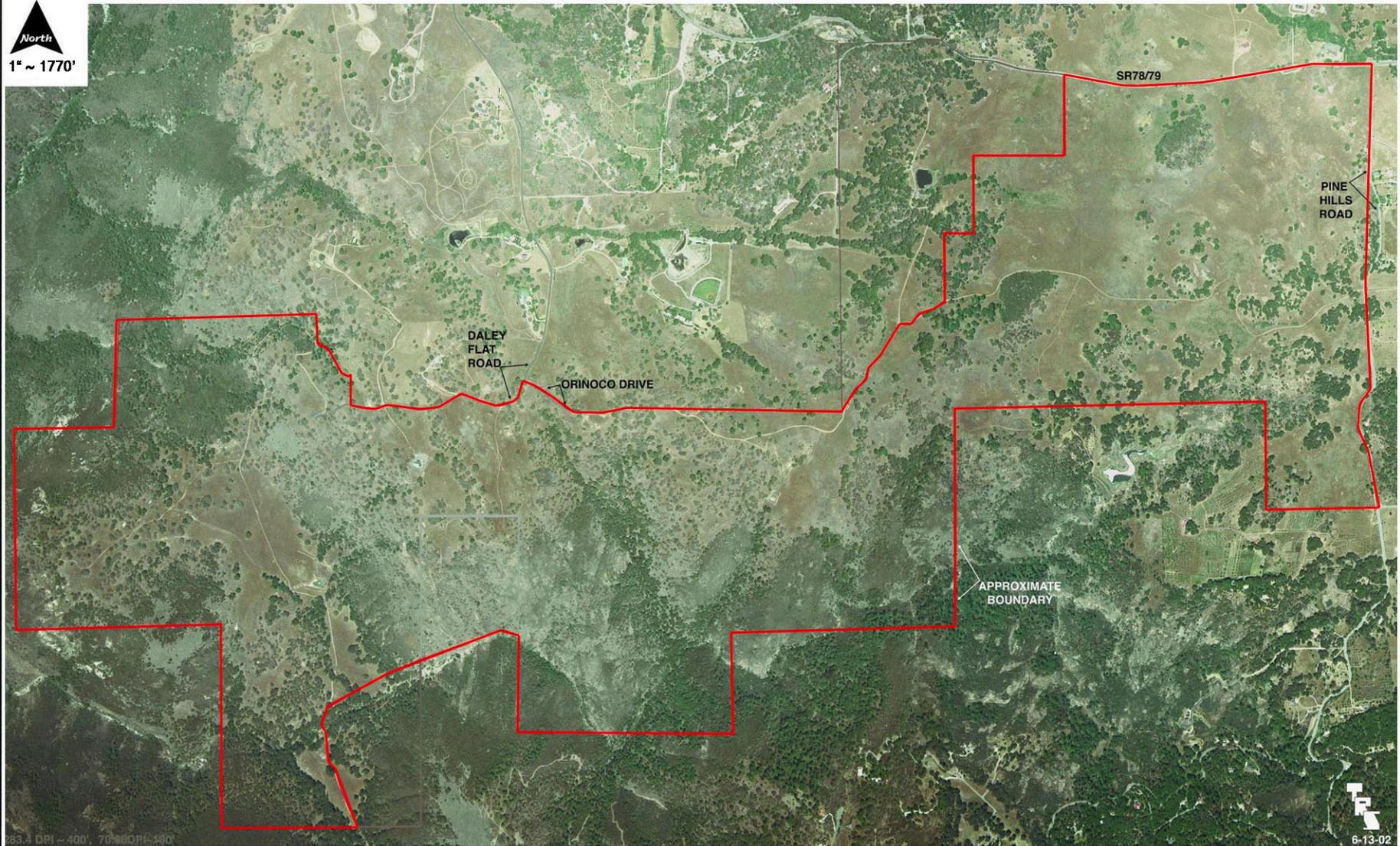


Figure
S-2

Aerial Photograph



SIGNIFICANT IMPACTS MITIGATED TO A LEVEL OF LESS THAN SIGNIFICANT

Project-Level Impacts

2.1 Biological Resources

Impact No.	Impact	Mitigation	Conclusion and Mitigation Effectiveness
2.1.2.1 Special Status Species			
BI-1	Indirect long-term impacts to Swainson's Hawk, and Cuyamaca Meadowfoam due to habitat loss	<p>M-BI-1 Management and preservation of 1,209.8 acres of open space protected by a dedicated Biological Open Space or Conservation Easement.</p> <p>M-BI-2 A Resource Management Plan (RMP) will be required to manage open space in perpetuity. The RMP will control human and animal encroachment, provide weed abatement, vegetation monitoring, sensitive species monitoring, and restrictions to recreational uses of the open space. Restrictions may include fencing and/or signage.</p> <p>M-BI-5 The CGMP contains site-specific conservation measures and practices that address multiple resource concerns on areas where grazing related activities or practices will be planned and applied. 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.</p>	Special Status Species and others that could occur onsite will be conserved in the open space easement areas. The open space will be protected and managed in perpetuity under a RMP, thereby conserving the viability of Special Status Species. The RMP and the CGMP work together to provide the open space adequate protections while allowing grazing to occur onsite. With implementation of these measures, impacts are rendered not significant.

SIGNIFICANT IMPACTS MITIGATED TO A LEVEL OF LESS THAN SIGNIFICANT

Project-Level Impacts

2.1 Biological Resources

Impact No.	Impact	Mitigation	Conclusion and Mitigation Effectiveness
BI-2	<p>Direct and indirect impacts to County Group A or B plant species, County Group I animal species, or state Species of Special Concern: Direct impacts: San Diego Gumplant, Velvety False Lupine, Two-striped Garter Snake, and Large-blotched Salamander. Indirect impacts: San Diego Milk-vetch, Grasshopper Sparrow, Golden Eagle, Red-shouldered Hawk, Turkey Vulture, Northern Harrier, White-tailed Kite, Southwestern Pond Turtle, Cooper’s Hawk, and Sharp-shinned Hawk.</p>	<p>M-BI-1 Management and preservation of 1,209.8 acres of open space protected by a dedicated Biological Open Space or Conservation Easement, and an RMP for resources onsite.</p> <p>M-BI-2 An RMP will control human and animal encroachment, provide weed abatement, vegetation monitoring, sensitive species monitoring, and restrictions to recreational uses of the open space. Restrictions may include fencing and/or signage.</p> <p>M-BI-5 The CGMP contains site-specific conservation measures and practices that address multiple resource concerns on areas where grazing related activities or practices will be planned and applied. 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.</p>	<p>Special Status Species and others that could occur onsite will be conserved in the open space easement areas. The open space will be protected and managed in perpetuity under a RMP, thereby conserving the viability of Special Status Species, including County Group A or B plant species, County Group I animal species, or state Species of Special Concern, as listed. The RMP and the CGMP work together to provide the open space adequate protections while allowing grazing to occur onsite. With implementation of these measures, impacts are rendered not significant.</p>
BI-3	<p>Direct and indirect impacts to County Group C or D plant Species, or County Group II animal species: Direct impacts: Banner Dudleya, Engelmann Oak, San Diego Desert Woodrat, Silvery Legless Lizard,</p>	<p>M-BI-1 Management and preservation of 1,209.8 acres of open space protected by a dedicated Biological Open Space or Conservation Easement, and an RMP for resources onsite.</p> <p>M-BI-2 An RMP will control human and animal encroachment, provide weed abatement, vegetation monitoring, sensitive species monitoring, and restrictions to recreational uses of the open space. Restrictions may</p>	<p>Special Status Species and others that could occur onsite will be conserved in the open space easement areas. The open space will be protected and managed in perpetuity under a RMP, thereby conserving the viability of Special Status Species, including County Group C or D plant species, County Group II animal species, as listed. The RMP and the CGMP work together to provide the open space adequate protections while allowing grazing to occur onsite. With implementation of these measures, impacts are rendered</p>

SIGNIFICANT IMPACTS MITIGATED TO A LEVEL OF LESS THAN SIGNIFICANT

Project-Level Impacts

2.1 Biological Resources

Impact No.	Impact	Mitigation	Conclusion and Mitigation Effectiveness
<p><u>BI-3</u> <u>Con't</u></p>	<p>Orange-throated Whiptail, San Diego Ringneck Snake, Coronado Skink, San Diego Horned Lizard, Coastal Western Whiptail, Coastal Rosy Boa, and Northern Red Diamond Rattlesnake. Indirect impacts: Great Blue Heron, Horned Lark, Western Bluebird, Barn Owl, Mountain Lion, Mule Deer, and Monarch Butterfly.</p>	<p>include fencing and/or signage.</p> <p>M-BI-5 The CGMP contains site-specific conservation measures and practices that address multiple resource concerns on areas where grazing related activities or practices will be planned and applied. 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.</p>	<p>not significant.</p>
<p>BI-4</p>	<p>Direct and indirect long-term impacts to Golden Eagle habitat due to habitat conversion</p>	<p>M-BI-1 Management and preservation of 1,209.8 acres of open space protected by a dedicated Biological Open Space or Conservation Easement, and an RMP for resources onsite.</p> <p>M-BI-2 An RMP will control human and animal encroachment, provide weed abatement, vegetation monitoring, sensitive species monitoring, and restrictions to recreational uses of the open space. Restrictions may include fencing and/or signage.</p> <p>M-BI-5 The CGMP contains site-specific conservation measures and practices that address multiple resource concerns on areas where grazing related activities or practices will be planned and applied. The CGMP defines</p>	<p>Special Status Species such as Golden Eagles and others that could occur onsite will be conserved in the open space easement areas. The open space will be protected and managed in perpetuity under a RMP that will provide protections for resources onsite, including raptor and Golden Eagle habitat. The RMP and the CGMP work together to provide the open space adequate protections while allowing grazing to occur onsite. With implementation of these measures, impacts are rendered not significant.</p>

SIGNIFICANT IMPACTS MITIGATED TO A LEVEL OF LESS THAN SIGNIFICANT

Project-Level Impacts			
2.1 Biological Resources			
Impact No.	Impact	Mitigation	Conclusion and Mitigation Effectiveness
<u>BI-4</u> Con't		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.	
BI-5	Direct long-term (permanent) impacts to up to 206.9 acres of potential foraging habitat for the site's resident and potentially-resident raptor species, including Golden Eagle, Swainson's Hawk, Red-shouldered Hawk, and White-tailed Kite.	<p>M-BI-1 Management and preservation of 1,209.8 acres of open space protected by a dedicated Biological Open Space or Conservation Easement, and an RMP for resources onsite.</p> <p>M-BI-2 An RMP will control human and animal encroachment, provide weed abatement, vegetation monitoring, sensitive species monitoring, and restrictions to recreational uses of the open space. Restrictions may include fencing and/or signage.</p> <p>M-BI-5 The CGMP contains site-specific conservation measures and practices that address multiple resource concerns on areas where grazing related activities or practices will be planned and applied. 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.</p>	Special Status Species such as raptors, Golden Eagles, Swainson's Hawks, Red-shouldered Hawks, and White-tailed Kites, and others that could occur onsite will be conserved in the open space easement areas. The open space will be protected and managed in perpetuity under a RMP that will provide protections for resources onsite, including raptor habitat. The RMP and the CGMP work together to provide the open space adequate protections while allowing grazing to occur onsite. With implementation of these measures, impacts are rendered not significant.
BI-6	Indirect long-term impacts to special status species due to human presence or intrusion.	<p>M-BI-1 Management and preservation of 1,209.8 acres of open space protected by a dedicated Biological Open Space or Conservation Easement and an RMP for resources onsite.</p> <p>M-BI-2 The RMP will control human and animal encroachment. Restrictions may include fencing and/or</p>	Special Status Species and others that could occur onsite will be conserved in the open space easement areas. The open space will be protected and managed in perpetuity under an RMP, thereby conserving the viability of Special Statue Species. The RMP and the CGMP work together to provide the open space adequate protections while allowing grazing to occur onsite. With implementation of these measures,

SIGNIFICANT IMPACTS MITIGATED TO A LEVEL OF LESS THAN SIGNIFICANT

Project-Level Impacts

2.1 Biological Resources

Impact No.	Impact	Mitigation	Conclusion and Mitigation Effectiveness
<p><u>BI-6</u> <u>Con't</u></p>		<p>signage.</p> <p>M-BI-5 The CGMP contains site-specific conservation measures and practices that address multiple resource concerns on areas where grazing related activities or practices will be planned and applied. 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.</p>	<p>impacts are rendered not significant.</p>

SIGNIFICANT IMPACTS MITIGATED TO A LEVEL OF LESS THAN SIGNIFICANT

Project-Level Impacts

2.1 Biological Resources

Impact No.	Impact	Mitigation	Conclusion and Mitigation Effectiveness
BI-7	Indirect short-term impacts to nesting success of special status species due to grading or other noise-generating activities	<p>M-BI-1 Management and preservation of 1,209.8 acres of open space protected by a dedicated Biological Open Space or Conservation Easement and an RMP for resources onsite.</p> <p>M-BI-2 The RMP will place restrictions on grading and other activities for the protection of nesting animals.</p> <p>M-BI-3 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 breeding season, defined as from 1 January to 31 August of each year. 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 will be required. The results of the survey will be provided in a report to the Director, Department of Planning and Land Use and the Wildlife Agencies for concurrence.</p>	These measures will be effective because they eliminate or limit project-related activity in the vicinity of breeding birds for the duration of their breeding season. With implementation of these measures, impacts are rendered not significant.

2.1.2.2 Riparian Habitat or Sensitive Natural Communities

BI-8	Direct long-term impacts due to project-related future construction, grading, clearing, or other activities which impact 12.6 acres of Southern Mixed	<p>M-BI-1 Management and preservation of 1,209.8 acres of open space protected by a dedicated Biological Open Space or Conservation Easement and an RMP for resources onsite.</p> <p>A loss of 12.6 acres of Southern Mixed Chaparral requires 6.3 acres of mitigation at a ratio of 0.5:1. The Proposed</p>	These measures will be effective because they will provide for the preservation of sensitive habitat in a protected setting. The project provides more mitigation acreage than required in each instance of impact with the exception of Riparian Scrub. The Proposed Project's impacts to Riparian Scrub meet the criteria for RPO crossings. Mitigation for impacts to Riparian Scrub will be implemented through
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SIGNIFICANT IMPACTS MITIGATED TO A LEVEL OF LESS THAN SIGNIFICANT

Project-Level Impacts

2.1 Biological Resources

Impact No.	Impact	Mitigation	Conclusion and Mitigation Effectiveness
<p><u>BI-8</u> <u>Con't</u></p>	<p>Chaparral, 0.8 acres of Chamise Chaparral, 3.8 acres of Diegan Coastal Sage Scrub, Inland Form, 12.8 acres of Flat-top Buckwheat, 4.6 acres of Coast Live Oak Woodland, 45.9 from Project development and 2.2 acres from open space easement vacation acres of Engelmann Oak Woodland, 15.3 acres of Mixed Oak Woodland, 102.8 acres of Non-native Grassland, 7.3 acres of Montane Meadow, and 0.25 acre of Riparian Scrub.</p>	<p>Project provides 104.9 acres in the OSE, 26.9 of which are impact neutral. The total available for mitigation is well above the requirement.</p> <p>A loss of 0.8 acres of Chamise Chaparral requires 0.4 acre of mitigation at a ratio of 0.5:1. The Proposed Project provides 96.1 acres in the OSE, 12.7 of which are impact neutral. The total available for mitigation is well above the requirement.</p> <p>A loss of 3.8 acres of Diegan Coastal Sage Scrub requires 7.6 acres of mitigation at a ratio of 2:1. The Proposed Project provides 36.8 acres in the OSE, 1.5 acres of which are impact neutral. The total available for mitigation is well above the requirement.</p> <p>A loss of 12.8 acres of Flat-top Buckwheat requires 25.6 acres of mitigation at a ratio of 2:1. The Proposed Project provides 58.6 acres in the OSE, 6.0 acres of which are impact neutral. The total available for mitigation is above the requirement.</p> <p>A loss of 4.6 acres of Coast Live Oak Woodland requires 13.8 acres of mitigation at a ratio of 3:1. The Proposed Project provides 171.2 acres in the OSE, 51.8 acres of which are impact neutral. The total available for mitigation is well above the requirement.</p> <p>A loss of 43.7 acres from Project development and 2.2 acres of open space vacation of Engelmann Oak Woodland requires a total of 144.3 acres of mitigation at a ratio of 3:1 and 6:1, respectively. The Proposed Project provides 200.1 acres in the OSE, 44.2 acres of which are impact neutral. The total available for mitigation is well above the</p>	<p>offsite preservation or onsite creation, which will reduce impacts below a level of significance. The RMP and agency oversight for permitting when necessary provide the necessary protections to ensure the long-term viability of the open space. The RMP and the CGMP work together to provide the open space adequate protections while allowing grazing to occur onsite. With implementation of these measures, impacts are rendered not significant.</p>

SIGNIFICANT IMPACTS MITIGATED TO A LEVEL OF LESS THAN SIGNIFICANT

Project-Level Impacts

2.1 Biological Resources

Impact No.	Impact	Mitigation	Conclusion and Mitigation Effectiveness
<p><u>BI-8</u> <u>Con't</u></p>		<p>requirement.</p> <p>A loss of 15.3 acres of Mixed Oak Woodland requires 45.9 acres of mitigation at a ratio of 3:1. The Proposed Project provides 99.7 acres in the OSE, 45.4 acres of which are impact neutral. The total available for mitigation is well above the requirement.</p> <p>A loss of 0.8 acres of Mixed Oak/Coniferous/Bigcone/Coulter requires 2.4 acres of mitigation at a ratio of 3:1. The Proposed Project provides 7.9 acres in the OSE, 2.8 acres of which are impact neutral. The total available for mitigation is well above the requirement.</p> <p>A loss of 101.5 acres for Project development and 1.3 acres of open space easement vacation of Non-native Grassland requires 52.1 acres of mitigation at a ratio of 0.5:1 and 1:1, respectively. The Proposed Project provides 273.0 acres in the OSE, 13.8 acres of which are impact neutral. The total available for mitigation is well above the requirement.</p> <p>A loss of 7.3 acres of Montane Meadow requires 21.9 acres of mitigation at a ratio of 3:1. The Proposed Project provides 69.0 acres in the OSE, 2.3 acres of which are impact neutral. The total available for mitigation is well above the requirement.</p> <p>A loss of 0.25 acre of Riparian Scrub requires 0.75 acre of mitigation at a ratio of 3:1. Due to the County's No Net Loss policy for wetlands, any impact to wetland habitat such as Riparian Scrub, must be mitigated. Therefore, the 2.96 acres in the OSE are considered "Impact Neutral," and</p>	

SIGNIFICANT IMPACTS MITIGATED TO A LEVEL OF LESS THAN SIGNIFICANT

Project-Level Impacts

2.1 Biological Resources

Impact No.	Impact	Mitigation	Conclusion and Mitigation Effectiveness
<p><u>BI-8</u> <u>Con't</u></p>		<p>cannot satisfy the requirement for mitigation. The proposed mitigation can be either offsite mitigation in an approved wetland mitigation bank, or the preparation and implementation of an approved Wetland Revegetation Plan (WRP) (provided as Attachment E to the biology report).</p> <p>M-BI-2 The RMP will provide enforceable protective measures for the resources within the open space.</p> <p>M-BI-5 The CGMP contains site-specific conservation measures and practices that address multiple resource concerns on areas where grazing related activities or practices will be planned and applied. 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.</p> <p>M-BI-8 The project may be required to obtain an HLP from the County of San Diego or “coverage” under the County’s anticipated future Subarea East County MSCP Plan Permit and Implementing Agreement. These permits will mitigate agency concerns by providing appropriate mitigation for all project-related impacts to Diegan Coastal Sage Scrub and related Scrub habitats.</p>	
<p>BI-9</p>	<p>Project-related future construction, grading, clearing, or other activities will result in</p>	<p>M-BI-1 Management and preservation of 1,209.8 -acres of open space protected by a dedicated Biological Open Space or Conservation Easement and an RMP for resources onsite. The impacts to hydrophytic areas of Non-native</p>	<p>The project provides more mitigation acreage than required in each instance of impact, with the exception of Riparian Scrub, as described above. The open space design, as well as RMP and agency oversight for permitting when</p>

SIGNIFICANT IMPACTS MITIGATED TO A LEVEL OF LESS THAN SIGNIFICANT

Project-Level Impacts

2.1 Biological Resources

Impact No.	Impact	Mitigation	Conclusion and Mitigation Effectiveness
<p><u>BI-9</u> <u>Con't</u></p>	<p>direct long-term (permanent) impacts to jurisdictional wetlands and/or riparian habitats, as defined by ACOE, CDFG, and the County of San Diego. This will include the limited removal of vegetation; grading; obstruction or diversion of water flow; placement of fill; placement of structures; construction of road crossings; placement of culverts or other underground piping; disturbance of the substratum; and/or activities that may cause a measurable, adverse change in native species composition, diversity, and abundance. Hydrophytic areas of the Non-native Grassland, Montane Meadow, Riparian Scrub, and the Southern Coast Live Oak Riparian Forest that will</p>	<p>Grassland, Montane Meadow, Riparian Scrub, and the Southern Coast Live Oak Riparian Forest that will be impacted by the Proposed Project qualify as jurisdictional wetland and/or riparian habitats. Mitigation for these losses is detailed in BI-9, above.</p> <p>M-BI-2 The RMP will provide enforceable protective measures for the resources within the open space.</p> <p>M-BI-5 The CGMP contains site-specific conservation measures and practices that address multiple resource concerns on areas where grazing related activities or practices will be planned and applied. 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.</p> <p>M-BI-8 The project may be required to obtain an HLP from the County of San Diego or “coverage” under the County’s anticipated future Subarea East County MSCP Plan Permit and Implementing Agreement. These permits will mitigate agency concerns by providing appropriate mitigation for all project-related impacts to Diegan Coastal Sage Scrub and related Scrub habitats.</p>	<p>necessary provide the necessary protections to ensure the long-term viability of the open space. The RMP and the CGMP work together to provide the open space adequate protections while allowing grazing to occur onsite. With implementation of these measures, impacts are rendered not significant.</p>

SIGNIFICANT IMPACTS MITIGATED TO A LEVEL OF LESS THAN SIGNIFICANT

Project-Level Impacts

2.1 Biological Resources

Impact No.	Impact	Mitigation	Conclusion and Mitigation Effectiveness
<u>BI-9</u> <u>Con't</u>	be impacted by the Proposed Project qualify as jurisdictional wetland and/or riparian habitats.		
BI-10	Indirect long-term impacts due to increased human access or competition from domestic animals, pests or exotic species to levels proven to adversely affect sensitive habitats	<p>M-BI-1 Management and preservation of 1,209.8 acres of open space protected by a dedicated Biological Open Space or Conservation Easement and an RMP for resources onsite.</p> <p>M-BI-2 The RMP will control human and animal encroachment. Restrictions may include fencing and/or signage.</p> <p>M-BI-5 The CGMP contains site-specific conservation measures and practices that address multiple resource concerns on areas where grazing related activities or practices will be planned and applied. 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.</p>	The open space will be protected and managed in perpetuity via the RMP. The RMP and the CGMP work together to provide the open space adequate protections while allowing grazing to occur onsite. With implementation of these measures, impacts are rendered not significant.
2.1.2.3 Jurisdictional Wetlands and Jurisdictional Wetland and Waterways			
BI-11	Project-related future construction, grading, clearing, or other activities will result in direct long-term (permanent) impacts to	<p>M-BI-12 Management and preservation of 1,209.8 acres of open space protected by a dedicated Biological Open Space or Conservation Easement.</p> <p>M-BI-2 An RMP will control human and animal encroachment. Restrictions may include fencing and/or</p>	These measures will be effective because they will provide for the preservation of sensitive habitat in a protected setting, and will provide for the revegetation and preservation of onsite wetlands, specifically, through the WRP. No net loss of wetland will occur. With implementation of these measures, impacts are rendered not significant.

SIGNIFICANT IMPACTS MITIGATED TO A LEVEL OF LESS THAN SIGNIFICANT

Project-Level Impacts

2.1 Biological Resources

Impact No.	Impact	Mitigation	Conclusion and Mitigation Effectiveness
<p><u>BI-11</u> <u>Con't</u></p>	<p>jurisdictional wetlands and/or waterways, as defined by ACOE. This will include the limited removal of vegetation; grading; obstruction or diversion of water flow; placement of fill; placement of structures; construction of road crossings; placement of culverts or other underground piping; disturbance of the substratum; and/or activities that may cause a measurable, adverse change in native species composition, diversity, and abundance. The Proposed Project will impact 0.14 acre of jurisdictional wetlands and/or riparian habitats.</p>	<p>signage.</p> <p>M-BI-4 The Proposed Project also includes the preparation and implementation of a Wetland Revegetation Plan (WRP) (attached to the biological analysis). The purpose of the Wetland Revegetation Plan (WRP) shall be to guide the revegetation of degraded and disturbed areas of the site with native wetland vegetation in order to mitigate for project 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.</p> <p>M-BI-6 Because the project will impact jurisdictional wetlands and/or non-wetland "waters", it will likely be necessary to obtain certain regulatory agency permits as a condition of project approval.</p>	
<p>2.1.2.5 Local Policies, Ordinances, Adopted Plans</p>			
<p>BI-12</p>	<p>Direct long-term (permanent) impacts to a measurable amount of RPO-sensitive habitat</p>	<p>M-BI-1 Management and preservation of 1,209.8- acres of open space protected by a dedicated Biological Open Space or Conservation Easement and an RMP for resources</p>	<p>These measures will be effective because they will provide for the preservation of sensitive habitat in a protected setting under an RMP. Mitigation ratios will preserve additional areas of habitat that will contribute to the long</p>

SIGNIFICANT IMPACTS MITIGATED TO A LEVEL OF LESS THAN SIGNIFICANT

Project-Level Impacts

2.1 Biological Resources

Impact No.	Impact	Mitigation	Conclusion and Mitigation Effectiveness
<p><u>BI-12</u> <u>Con't</u></p>	<p>lands. That is, the Proposed Project will directly impact 12.6 acres of Southern Mixed Chaparral, 0.8 acres of Chamise Chaparral, 3.8 acres of Diegan Coastal Sage Scrub, Inland Form, 12.8 acres of Flat-top Buckwheat, 4.6 acres of Coast Live Oak Woodland, 43.7 acres from direct Project impacts and 2.2 acres from open space easement vacation of Engelmann Oak Woodland, 15.3 acres of Mixed Oak Woodland, 101.5 acres from Project impacts and 1.5 acres from open space easement vacation of Non-native Grassland, 7.3 acres of Montane Meadow, and 0.25 acre of Riparian Scrub onsite.</p> <p>Of these habitats, hydrophytic areas of ef</p>	<p>onsite.</p> <p>M-BI-2 An RMP will control human and animal encroachment. Restrictions may include fencing and/or signage.</p> <p>M-BI-5 The CGMP contains site-specific conservation measures and practices that address multiple resource concerns on areas where grazing related activities or practices will be planned and applied. 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.</p> <p>M-BI-8 The project may be required to obtain an HLP from the County of San Diego or “coverage” under the County’s anticipated future Subarea East County MSCP Plan Permit and Implementing Agreement. These permits will mitigate agency concerns by providing appropriate mitigation for all project-related impacts to Diegan Coastal Sage Scrub and related Scrub habitats.</p>	<p>term preservation of these habitats. The RMP and the CGMP work together to provide the open space adequate protections while allowing grazing to occur onsite. If required, an HLP will provide additional measures for species protections. With implementation of these measures, impacts are rendered not significant.</p>

SIGNIFICANT IMPACTS MITIGATED TO A LEVEL OF LESS THAN SIGNIFICANT

Project-Level Impacts

2.1 Biological Resources

Impact No.	Impact	Mitigation	Conclusion and Mitigation Effectiveness
<p><u>BI-12</u> <u>Don't</u></p>	<p>the Non-native Grassland and Montane Meadow, the Southern Coast Live Oak Riparian Forest, and the Riparian Scrub qualify as RPO sensitive lands. The upland habitats (Southern Mixed Chaparral, Diegan Coastal Sage Scrub, Inland Form, Flat-top Buckwheat, Coastal Sage-Chaparral Scrub, Coast Live Oak Woodland, Engelmann Oak Woodland, Mixed Oak Woodland, Mixed Oak/Coniferous/Bigcone/Coulter, and non-hydrophytic areas of the Non-native Grassland and Montane Meadow) may also qualify as RPO "sensitive habitat lands", because they support unique vegetation communities and/or the habitats of rare or endangered species or sub-species of animals or plants, as defined by</p>		

SIGNIFICANT IMPACTS MITIGATED TO A LEVEL OF LESS THAN SIGNIFICANT

Project-Level Impacts

2.1 Biological Resources

Impact No.	Impact	Mitigation	Conclusion and Mitigation Effectiveness
<u>BI-12</u> <u>Con't</u>	Section 15380 of the State CEQA Guidelines, including the area that is necessary to support a viable population of any of the sensitive species known from this site in perpetuity, that is critical to the proper functioning of a balanced natural ecosystem, and/or that serves as part of a functioning wildlife corridor.		
BI-13	Direct and indirect long-term impacts because the project as proposed, absent seasonal restrictions to construction activities, could result in the loss of migratory birds or destruction of active migratory bird nests and/or eggs as a result of construction-related activities such as brushing, clearing, and grading of the site.	<p>M-BI-1 Management and preservation of 1,209.8 acres of open space protected by a dedicated Biological Open Space or Conservation Easement and an RMP for resources onsite.</p> <p>M-BI-2 An RMP will control human and animal encroachment. Restrictions may include fencing and/or signage.</p> <p>M-BI-3 The RMP will place restrictions on grading and other activities for the protection of nesting 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 breeding season, defined as from 1 January to 31 August of each year. Should it be necessary to conduct brushing, grading, or other construction activities during the bird breeding season, a</p>	These measures will be effective because they eliminate or limit Project-related activity in the vicinity of breeding birds for the duration of their breeding season. With implementation of these measures, impacts are rendered not significant.

SIGNIFICANT IMPACTS MITIGATED TO A LEVEL OF LESS THAN SIGNIFICANT

Project-Level Impacts

2.1 Biological Resources

Impact No.	Impact	Mitigation	Conclusion and Mitigation Effectiveness
<u>BI-13</u> <u>Con't</u>		preconstruction nesting survey of all areas within 500 feet <u>Si</u> n of the proposed activity will be required. The results of the survey will be provided in a report to the Director, Department of Planning and Land Use and the Wildlife Agencies for concurrence.	
BI-14	Indirect long-term impacts because the project site supports Golden Eagles, and will result in the loss of some foraging habitat for this species. Additionally, Project activities could modify eagle behavior, resulting in a “take” as defined by the Wildlife agencies.	<p>M-BI-1 Management and preservation of 1,209.8 acres of open space protected by a dedicated Biological Open Space or Conservation Easement and an RMP for resources onsite.</p> <p>M-BI-2 An RMP will control human and animal encroachment. Restrictions may include fencing and/or signage.</p> <p>M-BI-3 The RMP will place seasonal restrictions on grading and other activities for the protection of nesting animals, as described in BI-15.</p> <p>M-BI-5 The CGMP contains site-specific conservation measures and practices that address multiple resource concerns on areas where grazing related activities or practices will be planned and applied. 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.</p>	These measures will be effective because they will provide for the preservation of sensitive habitat in a protected setting under an RMP. The RMP and the CGMP work together to provide the open space adequate protections while allowing grazing to occur onsite. These measures eliminate or limit Project-related activity in the vicinity of breeding birds for the duration of their breeding season. Limiting activities to the non-breeding season will minimize chances for the incidental take of sensitive species such as Golden Eagles. With implementation of these measures, impacts are rendered not significant.

SIGNIFICANT IMPACTS MITIGATED TO A LEVEL OF LESS THAN SIGNIFICANT

Project-Level Impacts

2.2 Cultural Resources

Impact No.	Impact	Mitigation	Conclusion and Mitigation Effectiveness
Project-Level Impacts			
Archaeological and Historical Resources			
CR-1	Brushing and grading activities associated with the construction of the Proposed Project could result in the discovery of previously unrecorded, potentially significant historical resources as defined in Section 15064.5 of the State CEQA guidelines.	<p>M-CR-1 All grading on- and off-site will be monitored by an archaeologist and/or Native American representative. A monitoring program will be implemented for any grading or other ground-disturbing activity.</p> <p>Additionally, a temporary fencing and signage plan will be implemented along the perimeter of the open space during periods of construction activity.</p>	The proposed monitoring program will ensure that no impacts occur to resources because monitors will halt construction activities and will implement appropriate recovery activities upon the discovery of any resources. With implementation of these measures, impacts are rendered not significant.
CR-2	Brushing and grading activities associated with the construction of the Proposed Project could result in the discovery of previously unrecorded, potentially significant historical resources as defined by the Resource Protection Ordinance (RPO).	<p>M-CR-1 All grading on- and off-site will be monitored by an archaeologist and/or Native American representative. A monitoring program will be implemented for any grading or other ground-disturbing activity.</p> <p>Additionally, a temporary fencing and</p>	The proposed monitoring program will ensure that no impacts occur to resources because monitors will halt construction activities and will implement appropriate recovery activities upon the discovery of any resources. With implementation of these measures, impacts are rendered not significant.

SIGNIFICANT IMPACTS MITIGATED TO A LEVEL OF LESS THAN SIGNIFICANT

Project-Level Impacts

2.2 Cultural Resources

Impact No.	Impact	Mitigation	Conclusion and Mitigation Effectiveness
CR-2 Con't		signage plan will be implemented along the perimeter of the open space during periods of construction activity.	
CR-3	Brushing and grading activities associated with the construction of the Proposed Project could result in the discovery of previously unrecorded, potentially significant historical <u>archaeological</u> resources as defined in Section 15064.5 of the State CEQA Guidelines.	<p>M-CR-1 All grading on- and off-site will be monitored by an archaeologist and/or Native American representative. A monitoring program will be implemented for any grading or other ground-disturbing activity.</p> <p>Additionally, a temporary fencing and signage plan will be implemented along the perimeter of the open space during periods of construction activity.</p>	The proposed monitoring program will ensure that no impacts occur to resources because monitors will halt construction activities and will implement appropriate recovery activities upon the discovery of any resources. With implementation of these measures, impacts are rendered not significant.
CR-4	CA-SDI-16,881 is a historic trash deposit that contains important information potential that is being lost as the site erodes naturally. Although this is not an impact from the Proposed Project, it is an ongoing significant impact to the site.	M-CR-2 A data recovery excavation will be conducted to collect a sample of cultural material. This material will be cataloged and analyzed, and a report will be prepared to detail the methods and results of the data-recovery program.	Recovery and cataloguing of the resource will mitigate for impacts.
CR-5	Indirect impacts because all RPO-significant historic and archaeological resources will be located in open space protection. However, brushing and grading activities associated	M-CR-1 A monitoring program will be implemented for any grading or other ground-disturbing activity. Additionally, a temporary fencing and signage plan	The proposed monitoring program will ensure that no impacts occur to resources because monitors will halt construction activities and will implement appropriate recovery activities upon the discovery of any resources. With

SIGNIFICANT IMPACTS MITIGATED TO A LEVEL OF LESS THAN SIGNIFICANT

Project-Level Impacts

2.2 Cultural Resources

Impact No.	Impact	Mitigation	Conclusion and Mitigation Effectiveness
<u>CR-5</u> <u>Con't</u>	with the construction of the proposed project could result in the discovery of previously unrecorded historical/archaeological or archaeological resources.	will be implemented along the perimeter of the open space during periods of construction activity.	implementation of these measures, impacts are rendered not significant.
CR-6	No direct impacts since none of the cultural resources identified on the site contain human remains; therefore, no impacts to human remains will result from the project. However, brushing and grading activities associated with the construction of the proposed project could result in the discovery of previously unrecorded, potentially RPO-significant resources.	M-CR-1 A monitoring program will be implemented for any grading or other ground-disturbing activity. Additionally, a temporary fencing and signage plan will be implemented along the perimeter of the open space during periods of construction activity.	The proposed monitoring program will ensure that no impacts occur to resources because monitors will halt construction activities and will implement appropriate recovery activities upon the discovery of any resources. With implementation of these measures, impacts are rendered not significant.

Project-Level Impacts

2.3 Traffic

Impact No.	Impact	Mitigation	Conclusion and Mitigation Effectiveness
TR-1	In the cumulative condition, the project contributes vehicle trips to roadways that operate at inadequate levels of service.	M-TR-2 The project will pay a TIF fee toward improvements to the local roadway network.	Payment of a TIF fee will fully mitigate this impact because the fees will be used to improve area roadways where impacts occur.

Cumulative Level Impacts

Comparison of Project Alternative Impacts to Significant Proposed Project Impacts

Table S-2

	Project	No Development Alternative	No Project/Legal Lot Alternative	Reduced Project Alternative	Consolidated Alternative
Site Uses	24 lots from 40.1 to 196 acres Direct impact area: approx 201.9 acres Grazing to continue Protected open space Fire station lot provided Second access	No lots Grazing continues No protected open space No fire station lot No second access	4 lots from 130 to 840 acres Direct impact area: approx 40 acres No protected open space No fire station lot No second access	14 lots from 42 to 240 acres Direct impact area: approx 95 acres Grazing may continue Protected open space No fire station lot provided Second access	34 lots from 11.8 to 709.3 acres Direct Impact area: approx 194.9 acres Grazing may continue on one large lot Protected open space Fire station lot provided Second access
Biology	1,214.8 acres in open space	Less impact due to no residential development	Less impact due to reduced development area	Less impact due to reduced development area	Less impact due to reduced development area 1,221.9 acres in open space
Cultural Resources	45 sites in open space, recovered, or not significant	Less impact due to no residential development	Less due to reduced development area	Less due to reduced development area	Less due to reduced development area
Traffic	1,278 ADT	Less 0 additional ADT	Less 48 ADT	Less 780 ADT	Less 728 ADT
Agriculture*	17.6 acre encroachment on Prime Farmland	Less 0 encroachment	Less Encroachment possible	Less 10 acres of encroachment	Less 14.7 acres of encroachment

*Agriculture is not a significant project impact but is included here because it is a key issue