



County of San Diego

MARK WARDLAW
DIRECTOR
PHONE (858) 694-2962
FAX (858) 694-2555

PLANNING & DEVELOPMENT SERVICES
5510 OVERLAND AVENUE, SUITE 310, SAN DIEGO, CA 92123
www.sdcounty.ca.gov/pds

DARREN GRETLER
ASSISTANT DIRECTOR
PHONE (858) 694-2962
FAX (858) 694-2555

Statement of Reasons for Exemption from Additional Environmental Review and 15183 Checklist Pursuant to CEQA Guidelines §15183

Date: July 30, 2015
Project Title: Brook Forest Mitigation Bank
Record ID: PDS2014-LDGRMJ-00003, PDS2015-LPR-15-004, LOG NO. PDS2015-ER-15-08-015
Plan Area: Valley Center
GP Designation: Semi-Rural 1 (SR-1) and Rural Lands (RL-20)
Density: 1 du/ acre and 1 du/ 20 acres
Zoning: RR and A70
Min. Lot Size: 2 and 4 acres
Special Area Reg.: portion F
Lot Size: N/A
Applicant: Brook Forest LLC, C/O Jodi Schnoebelen (760) 535-6165
Staff Contact: Beth Ehsan - (858) 694-3103
Beth.Ehsan@sdcounty.ca.gov

Project Description

The project is the creation of a mitigation bank known as the Brook Forest Mitigation Bank (BFMB) on approximately 226 acres of vacant land located in Valley Center, California, south of Betsworth Road. The BFMB site includes Assessor's Parcel Nos. 186-210-70, 185-274-08, 186-061-01, 186-061-02, 186-061-03, 186-210-02 and 186-210-18. The BFMB will be approved by the Army Corps of Engineers and the California Department of Fish & Wildlife. After excluding roads and easements, the BFMB will protect 224.2 acres, including the preservation of approximately 190.1 acres of sensitive and protected upland and riparian habitat and the creation of approximately 26.4 acres of wetlands. The site is currently vacant. Once established, there would be no public access to the site and only minimal monitoring visits. The irrigation would be provided by groundwater from an on-site well.

The wetlands will be created on site by lowering the ground level within the Moosa Canyon Creek floodplain on-site an average of one to three feet and up to six feet resulting in ground elevations that are 12 to 18 inches from the water table. No work will be done in the Moosa Canyon Creek floodway. Approximately 80,000 cubic yards of soil will be excavated from the Moosa Canyon Creek floodplain adjacent to the streambed to achieve the wetlands establishment area. The finished wetland area will range from 160 to 810 feet in width. There will be no import or export of fill. Excavated soils will be loaded and transported to a 7.3 acre dirt disposal site within the BFMB Property. The 7.3 acre dirt

disposal site is located approximately 500 feet south of Moosa Canyon Creek in an area previously disturbed by existing dirt roads. Following completion of the dirt disposal, this 7.3 acre area will be reseeded with native species associated with coastal sage scrub and mixed chaparral.

The project site is subject to the Semi-Rural and Rural General Plan Regional Categories, Land Use Designations Semi-Rural 1 (SR-1) and Rural Lands (RL-20). Zoning for the site is RR and A70. The project is consistent with density and lot size requirements of the General Plan and Zoning Ordinance.

Overview

California Public Resources Code section 21083.3 and California Environmental Quality Act (CEQA) Guidelines Section 15183 provide an exemption from additional environmental review for projects that are consistent with the development density established by existing zoning, community plan or general plan policies for which an Environmental Impact Report (EIR) was certified, except as might be necessary to examine whether there are project-specific significant effects which are peculiar to the project or its site. Section 15183 specifies that examination of environmental effects shall be limited to those effects that: (1) Are peculiar to the project or the parcel on which the project would be located, and were not analyzed as significant effects in a prior EIR on the zoning action, general plan, or community plan, with which the project is consistent, (2) Are potentially significant off-site impacts and cumulative impacts which were not discussed in the prior EIR prepared for the general plan, community plan or zoning action, or (3) Are previously identified significant effects which, as a result of substantial new information which was not known at the time the EIR was certified, are determined to have a more severe adverse impact than discussed in the prior EIR. Section 15183(c) further specifies that if an impact is not peculiar to the parcel or to the proposed project, has been addressed as a significant effect in the prior EIR, or can be substantially mitigated by the imposition of uniformly applied development policies or standards, then an additional EIR need not be prepared for that project solely on the basis of that impact.

General Plan Update Program EIR

The County of San Diego General Plan Update (GPU) establishes a blueprint for future land development in the unincorporated County that meets community desires and balances the environmental protection goals with the need for housing, agriculture, infrastructure, and economic vitality. The GPU applies to all of the unincorporated portions of San Diego County and directs population growth and plans for infrastructure needs, development, and resource protection. The GPU included adoption of new General Plan elements, which set the goals and policies that guide future development. It also included a corresponding land use map, a County Road Network map, updates to Community and Subregional Plans, an Implementation Plan, and other implementing policies and ordinances. The GPU focuses population growth in the western areas of the County where infrastructure and services are available in order to reduce the potential for growth in the eastern areas. The objectives of this population distribution strategy are to: 1) facilitate efficient, orderly growth by containing development within areas potentially served by the San Diego County Water Authority (SDCWA) or other existing infrastructure; 2) protect natural resources through the reduction of population capacity in sensitive areas; and 3) retain or enhance the character of communities within the unincorporated County. The SDCWA service area covers approximately the western one third of the unincorporated County. The SDWCA boundary generally represents where water and wastewater infrastructure currently exist. This area is more developed than the eastern areas of the unincorporated County, and would accommodate more growth under the GPU.

The GPU EIR was certified in conjunction with adoption of the GPU on August 3, 2011. The GPU EIR comprehensively evaluated environmental impacts that would result from Plan implementation, including information related to existing site conditions, analyses of the types and magnitude of project-

level and cumulative environmental impacts, and feasible mitigation measures that could reduce or avoid environmental impacts.

Summary of Findings

The Brook Forest Mitigation Bank is consistent with the analysis performed for the GPU EIR. Further, the GPU EIR adequately anticipated and described the impacts of the proposed project, identified applicable mitigation measures necessary to reduce project specific impacts, and the project implements these mitigation measures (see [http://www.sdcounty.ca.gov/PDS/gpupdate/docs/BOS_Aug2011/EIR/FEIR_7.00 -
_Mitigation Measures 2011.pdf](http://www.sdcounty.ca.gov/PDS/gpupdate/docs/BOS_Aug2011/EIR/FEIR_7.00_-_Mitigation_Measures_2011.pdf) for complete list of GPU Mitigation Measures.

A comprehensive environmental evaluation has been completed for the project as documented in the attached §15183 Exemption Checklist. This evaluation concludes that the project qualifies for an exemption from additional environmental review because it is consistent with the development density and use characteristics established by the County of San Diego General Plan, as analyzed by the San Diego County General Plan Update Final Program EIR (GPU EIR, ER #02-ZA-001, SCH #2002111067), and all required findings can be made.

In accordance with CEQA Guidelines §15183, the project qualifies for an exemption because the following findings can be made:

- 1. The project is consistent with the development density established by existing zoning, community plan or general plan policies for which an EIR was certified.**
The project would preclude any subdivision of the property, thus it does not exceed the development density established by the General Plan and the certified GPU EIR.
- 2. There are no project specific effects which are peculiar to the project or its site, and which the GPU EIR failed to analyze as significant effects.**
The subject property is no different than other properties in the surrounding area, and there are no project specific effects which are peculiar to the project or its site. The project site is located in an area developed with similarly sized, estate residential lots with associated accessory uses. The property does not support any peculiar environmental features, and the project would not result in any peculiar effects.

In addition, as explained further in the 15183 Checklist below, all project impacts were adequately analyzed by the GPU EIR. The project could result in potentially significant impacts to biological and paleontological resources. However, applicable mitigation measures specified within the GPU EIR have been made conditions of approval for this project.

- 3. There are no potentially significant off-site and/or cumulative impacts which the GPU EIR failed to evaluate.**
The proposed project is consistent with the density and use characteristics of the development considered by the GPU EIR and would represent a small part of the growth that was forecast for build-out of the General Plan. The GPU EIR considered the incremental impacts of the proposed project, and as explained further in the 15183 Exemption Checklist below, no potentially significant off-site or cumulative impacts have been identified which were not previously evaluated.
- 4. There is no substantial new information which results in more severe impacts than anticipated by the GPU EIR.**

15183 Statement of Reasons

As explained in the 15183 exemption checklist below, no new information has been identified which would result in a determination of a more severe impact than what had been anticipated by the GPU EIR.

5. The project will undertake feasible mitigation measures specified in the GPU EIR.

As explained in the 15183 exemption checklist below, the project will undertake feasible mitigation measures specified in the GPU EIR. These GPU EIR mitigation measures will be undertaken through project design, compliance with regulations and ordinances, or through the project's conditions of approval.

Beth Ehsan

Signature

7/29/15

Date

Beth Ehsan

Printed Name

**Land Use / Environmental
Planner**

Title

CEQA Guidelines §15183 Exemption Checklist

Overview

This checklist provides an analysis of potential environmental impacts resulting from the proposed project. Following the format of CEQA Guidelines Appendix G, environmental effects are evaluated to determine if the project would result in a potentially significant impact triggering additional review under Guidelines section 15183.

- Items checked “Significant Project Impact” indicates that the project could result in a significant effect which either requires mitigation to be reduced to a less than significant level or which has a significant, unmitigated impact.
- Items checked “Impact not identified by GPU EIR” indicates the project would result in a project specific significant impact (peculiar off-site or cumulative that was not identified in the GPU EIR.
- Items checked “Substantial New Information” indicates that there is new information which leads to a determination that a project impact is more severe than what had been anticipated by the GPU EIR.

A project does not qualify for a §15183 exemption if it is determined that it would result in: 1) a peculiar impact that was not identified as a significant impact under the GPU EIR; 2) a more severe impact due to new information; or 3) a potentially significant off-site impact or cumulative impact not discussed in the GPU EIR.

A summary of staff’s analysis of each potential environmental effect is provided below the checklist for each subject area. A list of references, significance guidelines, and technical studies used to support the analysis is attached in Appendix A. Appendix B contains a list of GPU EIR mitigation measures.

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
1. AESTHETICS – Would the Project:			
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion

1(a) The project site is visible from Betsworth Road, which is also the Cougar Pass Trail. The visual composition consists of a chaparral-covered hill in the background, with the vegetated Moosa Creek channel in the foreground surrounded by open fields.

The project will require grading; however, the proposed grading will reduce the existing surface by only a few feet and will not create significant new slopes. The project is compatible with the existing visual environment in terms of visual character and quality because the wetland habitat to be created along Moosa Creek will be an expansion of the existing riparian habitat, not a new element, and non-native grassland will still remain outside of the wetland creation area. No buildings or roads will be added to the site. Therefore, the proposed project will not have a substantial adverse effect on a scenic vista.

1(b) The property is not within the viewshed of a County or state scenic highway. The project site also does not support any significant scenic resources that would be lost or modified through development of the property.

1(c) The project would be consistent with existing community character. The existing visual character and quality of the project site can be characterized as a chaparral-covered hill in the background, with the vegetated Moosa Creek channel in the foreground surrounded by open fields. Surroundings include a similar mixture of hills, open fields, and trees interspersed with homes. The proposed project is a grading permit for a mitigation bank. The project is compatible with the existing visual environment’s visual character and quality for the following reasons: the hills that dominate the view would be unaffected, while the riparian vegetation in the foreground would be expanded. No new structures would be introduced and the elevation in the floodplain would be lowered by only a few feet.

1(d) Residential lighting would be required to conform with the County’s Light Pollution Code to prevent spillover onto adjacent properties and minimize impacts to dark skies.

Conclusion

As discussed above, the project would not result in any significant impacts to aesthetics; therefore, the project would not result in an impact which was not adequately evaluated by the GPU EIR.

2. Agriculture/Forestry Resources

– Would the Project:

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

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

c) Conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland zoned Timberland Production?

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

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

Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
---	---	--

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion

2(a) The project site contains Farmland of Local Importance. Due to the presence of onsite agricultural resources, an Agricultural Analysis dated March 1, 2015, prepared by James Chagala, on file with Planning & Development Services as Environmental Review Number PDS2014-LDGRMJ-00003, was completed to determine the importance of the resource based on the County’s Local Agricultural Resources Assessment (LARA) model. This model takes into account local factors that define the importance of San Diego County agricultural resources. The LARA model considers the availability of water resources, climate, soil quality, surrounding land use, topography, and land use or parcel size consistency between the project site and surrounding land uses. A more detailed discussion of the LARA model can be found in the Guidelines for Determining Significance for Agricultural Resources at <http://www.sdcounty.ca.gov/pds/docs/AG-Guidelines.pdf>.

The Analysis/LARA Model determined that the site received a moderate water rating, a moderate soil rating, a high climate rating, a high surrounding land use rating, a low land

use consistency rating, and a moderate slope rating. Since two of the required factors are rated as moderate and one high, and two of the complementary factors are rated moderate or low, the project falls within Scenario 6 of Table Two of the Guidelines and is not an important agricultural resource. Therefore, no potentially significant project or cumulative level conversion of agricultural resources to a non-agricultural use will occur as a result of this project.

- 2(b) The project site is zoned RR (Rural Residential) and A70 (Limited Agriculture), which are considered to be an agricultural zones. However, the proposed project will not result in a conflict in zoning for agricultural use, because a mitigation bank is a permitted use in these zones and will not create a conflict with existing zoning for agricultural use. Additionally, the project site's land is not under a Williamson Act Contract. Therefore, there will be no conflict with existing zoning for agricultural use, or a Williamson Act contract.
- 2(c) There are no timberland production zones on or near the property.
- 2(d) The project site contains Southern Coast Live Oak Riparian Forest and Open Engelmann Oak Woodland, both of which will be preserved in the proposed mitigation bank.
- 2(e) The surrounding area within radius of a quarter mile have land designated as Farmland of Local Importance and Unique Farmland and used for agricultural uses. However, as discussed in the Agricultural Analysis, dated March 1, 2015, prepared by James Chagala on file with Planning & Development Services as Environmental Review Number PDS2014-LDGRMJ-00003, the project will not result in the potentially significant conversion of Prime Farmland, Unique Farmland, Farmland of Statewide Importance or Farmland of Local Importance for the following reasons:
1. There is no land under a contract within ¼ miles of this property. There are lands to the north and south in citrus, and to the southwest in avocados. However, the conversion of the subject property to a Conservation/Mitigation Bank will not result in conflicts with these agricultural operations that will result in conversion of agricultural resources to non-agricultural use. These agricultural areas have been in existence for a number of years and during this time the subject property has been in natural vegetation. This part of the subject property will not change as a result of this mitigation bank so there is no reason to believe that placement of this property in a conservation easement would now result in the adjacent property being converted to a non-agricultural use.
 2. Land immediately to the west was once a nursery; however there has been no agricultural use on this property since 2009.
 3. The project proposes a Conservation/Mitigation Bank which will not involve any on-site personnel. It does not propose a school, church, day care or other use that involves a concentration of people at certain times.
 4. The project would not involve other changes to the existing environment, which due to their location or nature, could result in the conversion of offsite agricultural resource. This is currently vacant land which will be changed to a Conservation/Mitigation Bank.

Therefore, no potentially significant project or cumulative level conversion of Prime Farmland, Unique Farmland, Farmland of Statewide Importance or Farmland of Local Importance to a non-agricultural use will occur as a result of this project.

Conclusion

As discussed above, the project would not result in any significant impacts to agricultural resources; therefore, the project would not result in an impact which was not adequately evaluated by the GPU EIR.

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
3. Air Quality – Would the Project:			
a) Conflict with or obstruct implementation of the San Diego Regional Air Quality Strategy (RAQS) or applicable portions of the State Implementation Plan (SIP)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Create objectionable odors affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion

3(a) The project is below the development density that was anticipated and considered by SANDAG growth projections used in development of the RAQS and SIP. As such, the project would not conflict with either the RAQS or the SIP. In addition, the operational emissions from the project are below screening levels, and will not violate any ambient air quality standards.

3(b) Grading operations associated with the construction of the project would be subject to the Grading Ordinance, which requires the implementation of dust control measures. Emissions from the construction phase would be minimal, temporary and localized, resulting in pollutant emissions below the screening level criteria established by County air quality guidelines for determining significance. In addition, the operational vehicle trips generated from the project will not produce measurable Average Daily Trips (ADTs). According to the Bay Area Air Quality Management District CEQA Guidelines for Assessing the Air Quality Impacts of Projects and Plans, projects that generate less than 2,000 ADT are below the screening-level criteria established by the guidelines for criteria pollutants.

- 3(c) The project would contribute PM10, NOx, and VOCs emissions from construction/grading activities; however, the incremental increase would not exceed established screening thresholds (see question 3(b above)).
- 3(d) The project will not introduce additional sensitive receptors.
- 3(e) The project could produce objectionable odors during construction and operation; however, these substances, if present at all, would only be in trace amounts (less than 1 µg/m3).

Conclusion

As discussed above, the project would not result in any significant impacts to air quality; therefore, the project would not result in an impact which was not adequately evaluated by the GPU EIR.

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
4. Biological Resources – Would the Project:			
a) Have a substantial adverse effect, either directly or through habitat modifications, on any candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Conflict with the provisions of any adopted Habitat Conservation Plan, Natural Communities Conservation Plan, other approved local, regional or state habitat conservation plan or any other local policies or ordinances that protect biological resources?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion

4(a) Biological resources on the project site were evaluated in a Biological Resources Letter Report prepared by Vince Scheidt, dated July 2015. The site contains Diegan coastal sage scrub, extensive agriculture, non-native grassland, southern coast live oak riparian forest, open Engelmann oak woodland, southern willow scrub, mafic southern mixed chaparral, disturbed MSMC, native grassland, disturbed wetland, and disturbed habitat. Sensitive wildlife species identified on site were Southern California Rufous-crowned Sparrow, Great Blue Heron, Green Heron, Red-shouldered Hawk, Turkey Vulture, Yellow Warbler, Greater Roadrunner, Western Bluebird, Bewick's Wren, Lawrence's Goldfinch, Black-shouldered Kite, Mule Deer, Granite Night Lizard, San Diego Coast Horned Lizard, and Orange-throated Whiptail. Engelmann oak was the only sensitive plant species identified onsite. Protocol least Bell's vireo surveys conducted in 2012 were negative, and habitat evaluation showed that southwestern willow flycatcher is unlikely on the site based on current conditions; however, the proposed wetland creation project would increase the likelihood of least Bell's vireo and southwestern willow flycatcher using the site following project completion. Protocol gnatcatcher surveys conducted in 1998 and 2012 were negative. A Quino survey conducted in 1999 was negative, and surveys were not updated because the project site is no longer located within the recommended Quino survey area. An arroyo toad survey conducted in 1999 was negative, and the site is not considered suitable for arroyo toad based on the closed canopy on-site and the fact that the nearest known occurrence is on the San Luis Rey River, approximately seven miles away. The site is located in the Draft North County MSCP area, and its draft designation is Pre-approved Mitigation Area (PAMA).

The project includes wetland creation and habitat preservation; thus the overall result will be to enhance and preserve habitat value. However, there will be impacts to underlying habitat from the required cut and fill. Those impacts consist of 5.4 acres of non-native grassland (of which 0.1 is off-site), 20.7 acres of extensive agriculture, 2.7 acre of extensive agriculture beneath the canopy of southern willow scrub and southern coast live oak riparian forest, 0.3 acre of disturbed wetland, and 7.3 acres of disturbed habitat. The disturbed wetland will be converted to higher-quality southern willow scrub, thus it is classified as habitat enhancement by CDFW. According to the biology consultant, the extensive agriculture was not used for pasturing in the past, and was most recently dry-farmed to produce hay, which is planted in rows, and thus would not require mitigation. Mitigation for 5.4 acres of non-native grassland will be mitigated at a 0.5:1 ratio by subtracting 2.7 acres from the proposed mitigation bank's ledger of non-native grassland credits. The project could also cause a significant impact to nesting and breeding birds if grading were to occur during the breeding season. As considered by the GPU EIR, the project will also implement biological monitoring, fencing, signage, long-term management, and breeding season avoidance to prevent brushing, clearing, and/or grading between January 1 and August 31. The GPU EIR identified these mitigation measures as Bio 1.5.

4(b) The site contains Moosa Creek, which qualifies as wetland under the RPO, ACOE, and CDFW. The following sensitive habitats were identified on the site: Diegan coastal sage scrub, extensive agriculture, non-native grassland, southern coast live oak riparian forest, open Engelmann oak woodland, southern willow scrub, mafic southern mixed chaparral, disturbed MSMC, native grassland, and disturbed wetland. The floodway of Moosa Creek would not be impacted, and impacts to 0.3 acre of disturbed wetlands in the floodplain are classified as wetland enhancement per CDFW. As detailed in response a) above, direct and indirect impacts to sensitive natural communities identified

in the RPO, NCCP, Fish and Game Code, and Endangered Species Act, in this case 5.4 acres of non-native grassland, are mitigated through deducting mitigation credits from the proposed bank’s ledger.

- 4(c) The proposed project site contains wetlands as defined by Section 404 of the Clean Water Act, section 1600 of California Fish and Game Code, and the County Resource Protection Ordinance. The project will be conditioned to obtain 401/404 and 1600 permits before the bank’s Bank Enabling Instrument is signed.
- 4(d) The project will enhance wildlife movement by widening the riparian vegetation along Moosa Creek and preserving the adjacent upland habitat in perpetuity, in an area identified as draft PAMA by the draft North County MSCP.
- 4(e) The project is consistent with the Resource Protection Ordinance (RPO) because wetland creation and enhancement are allowed uses within RPO wetland and buffer. The project is not subject to the BMO because it is not located within the adopted MSCP area, and is not subject to the HLP ordinance because it will not impact any coastal sage scrub.

Conclusion

The project could result in potentially significant impacts to biological resources; however, further environmental analysis is not required because:

- 1. No peculiar impacts to the project or its site have been identified.
- 2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
- 3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
- 4. Feasible mitigation measures contained within the GPU EIR will be applied to the project.

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
5. Cultural Resources – Would the Project:			
a) Cause a substantial adverse change in the significance of a historical resource as defined in 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Directly or indirectly destroy a unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Directly or indirectly destroy a unique paleontological resource or site?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Disturb any human remains, including those interred	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

outside of formal cemeteries?

Discussion

- 5(a) Based on an analysis of records and a survey of the property by County of San Diego approved historian, Brian Smith, it has been determined that there are one or more historical resources within the project site. This resource includes a stacked rock wall (CA-SDI-15500/H). An historical resources report titled, *CEQA and Section 106 (NHPA) Cultural Resources Study for the Brook Forest Conservation Bank Project* (December 11, 2014) prepared by Brian F. Smith evaluated the significance of the historical resources. Based on the results of this study, it has been determined that site CA-SDI-15,500/H is significant pursuant to the State of California Environmental Quality Act (CEQA) Guidelines, Section 15064.5. Potential impacts are less than significant with the implementation of project design considerations that include placement of site CA-SDI-15500/H within open space. The significant historic resources are completely protected and will not be modified; therefore, the project will not have a significant impact to historical resources.
- 5(b) The project site has been surveyed by a County approved archaeologist, Brian Smith, and it has been determined that there are one (or more) archaeological resources present. These resources include bedrock milling features and a trash scatter. An archaeological technical study titled, *CEQA and Section 106 (NHPA) Cultural Resources Study for the Brook Forest Conservation Bank Project* (December 11, 2014) prepared by Brian F. Smith, evaluated the significance of the archaeological resources based on subsurface testing, analysis of recovered artifacts, and other investigations and it has been determined that the archaeological resource(s) are not significant pursuant to the State of California Environmental Quality Act (CEQA) Guidelines, Section 15064.5.

The Native American Heritage Commission (NAHC) was contacted on November 13, 2014 for a Sacred Lands check and for a listing of Native American Tribes whose ancestral lands may be impacted by the project. According to the NAHC (December 3, 2014), their record search failed to identify the presence of Native American cultural resources in the immediate project area. Tribes listed by the NAHC were contacted on December 5, 2015 by the County requesting whether Tribal Consultation was desired. Of the 26 Tribes/Organizations that were contacted, Pauma, Viejas, and San Luis Rey responded. Pauma, Viejas, and San Luis Rey requested that a Native American monitor be present during Archaeological Monitoring. The County responded to both Pauma and Viejas identifying that the presence of a Native American monitor would be required and made a condition of approval. County staff met with San Luis Rey on March 3, 2015 for Native American consultation. The San Luis Rey Band requested that in addition to Archaeological Monitoring, that should additional cultural features be found that they be (1) first avoided, and (2) if avoidance is not feasible, then be relocated in the wetland. Should the relocation in the wetland not be feasible, then they request that the features be relocated into the open space. Archaeological Monitoring, consisting of a County-approved archaeologist and Luiseno Native American Monitor, will be a required condition of project approval because of the proximity of known archaeological sites. The Archaeological Monitoring Program will include the requirement for (1) avoidance, and if that is not feasible, then (2) relocation of cultural features first into the wetland, and if that is infeasible then relocation into the open space, if feasible. Regional coordination with agencies, institutions such as the South Coastal Information Center, the NAHC, and local tribal governments is identified as mitigation measures Cul-2.2, Cul-2.4 and Cul-2.6 in the GPU EIR.

As considered by the GPU EIR, potential impacts to cultural resources will be mitigated through ordinance compliance and through implementation of the following mitigation measures: archaeological monitoring program under the supervision of a County-approved archaeologist and a Native American monitor and conformance with the County's Cultural Resource Guidelines if resources are encountered. The GPU EIR identified these mitigation measures as Cul-2.5. Archaeological monitoring will include the following requirements:

- Pre-Construction
 - Pre-construction meeting to be attended by the Project Archaeologist and Luiseno Native American monitor to explain the monitoring requirements.

- Construction
 - Monitoring. Both the Project Archaeologist and Luiseno Native American monitor are to be onsite during earth disturbing activities. The frequency and location of monitoring of native soils will be determined by the Project Archaeologist in consultation with the Luiseno Native American monitor. Monitoring of previously disturbed soils will be determined by the Project Archaeologist in consultation with the Luiseno Native American monitor.
 - If cultural resources are identified:
 - Both the Project Archaeologist and Luiseno Native American monitor have the authority to divert or temporarily halt ground disturbance operations in the area of the discovery.
 - The Project Archaeologist shall contact the County Archaeologist.
 - The Project Archaeologist in consultation with the County Archaeologist and Luiseno Native American shall determine the significance of discovered resources.
 - Construction activities will be allowed to resume after the County Archaeologist has concurred with the significance evaluation.
 - If previously unidentified bedrock milling features are identified, the following shall apply:
 - The bedrock milling features shall be avoided as the first option, if feasible.
 - If relocation of the bedrock milling features is not feasible, then implement relocation to the wetland area, if feasible.
 - If relocation of the bedrock milling features to the wetland area is not feasible, then relocate the bedrock milling features to the open space area, if feasible.
 - Relocation of any bedrock milling features requires an updated DPR form to identify the location in which the bedrock milling features were found and the location to which they were moved.
 - Isolates and non-significant deposits shall be minimally documented in the field. Should the isolates and non-significant deposits not be collected by the Project Archaeologist, the Luiseno Native American monitor may collect the cultural material for transfer to a Tribal curation facility or repatriation program.
 - If cultural resources are determined to be significant, a Research Design and Data Recovery Program shall be prepared by the Project Archaeologist in

consultation with the Luiseno Native American monitor and approved by the County Archaeologist. The program shall include reasonable efforts to preserve (avoid) unique cultural resources or Sacred Sites; the capping of identified Sacred Sites or unique cultural resources and placement of development over the cap if avoidance is infeasible; and data recovery for non-unique cultural resources. The preferred option is preservation (avoidance).

- Human Remains.

- The Property Owner or their representative shall contact the County Coroner and the PDS Staff Archaeologist.
- Upon identification of human remains, no further disturbance shall occur in the area of the find until the County Coroner has made the necessary findings as to origin.
- If the remains are determined to be of Native American origin, the Most Likely Descendant (MLD), as identified by the Native American Heritage Commission (NAHC), shall be contacted by the Property Owner or their representative in order to determine proper treatment and disposition of the remains.
- The immediate vicinity where the Native American human remains are located is not to be damaged or disturbed by further development activity until consultation with the MLD regarding their recommendations as required by Public Resources Code Section 5097.98 has been conducted.
- Public Resources Code §5097.98, CEQA §15064.5 and Health & Safety Code §7050.5 shall be followed in the event that human remains are discovered.

- Rough Grading

- Upon completion of Rough Grading, a monitoring report shall be prepared identifying whether resources were encountered.

- Final Grading

- A final report shall be prepared substantiating that earth-disturbing activities are completed and whether cultural resources were encountered.
- Disposition of Cultural Material.
 - The final report shall include evidence that all prehistoric materials have been curated at a San Diego curation facility or Tribal curation facility that meets federal standards per 36 CFR Part 79, or alternatively has been repatriated to a culturally affiliated Tribe.
 - The final report shall include evidence that all historic materials have been curated at a San Diego curation facility that meets federal standards per 36 CFR Part 79.

5(c) The site does not contain any unique geologic features that have been listed in the County's Guidelines for Determining Significance for Unique Geology Resources nor does the site support any known geologic characteristics that have the potential to support unique geologic features.

5(d) A review of the County's Paleontological Resources Maps and data on San Diego County's geologic formations indicates that the project is located on geological formations, namely quaternary alluvium, that potentially contain unique paleontological

resources. Proposed grading would include more than 2,500 cubic yards of excavation which has the potential to impact fossil deposits. Accordingly, grading monitoring conducted by the grading contractor will be a condition of project approval.

As considered by the GPU EIR, potential impacts to paleontological resources will be mitigated through ordinance compliance and through implementation of the following mitigation measures: grading monitoring and conformance with the County's Paleontological Resource Guidelines if resources are encountered. The GPU EIR identified these mitigation measures as Cul-3.1.

- 5(e) Based on an analysis of records and archaeological surveys of the property, it has been determined that the project site does not include a formal cemetery or any archaeological resources that might contain interred human remains.

Conclusion

The project could result in potentially significant impacts to cultural resources; however, further environmental analysis is not required because:

1. No peculiar impacts to the project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. Feasible mitigation measures contained within the GPU EIR will be applied to the project.

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
6. Geology and Soils – Would the Project:			
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving: rupture of a known earthquake fault, strong seismic ground shaking, seismic-related ground failure, liquefaction, and/or landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in an on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Have soils incapable of adequately supporting the use of	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

Discussion

- 6(a)(i) The project is not located in a fault rupture hazard zone identified by the Alquist-Priolo Earthquake Fault Zoning Act, Special Publication 42, Revised 1997, Fault-Rupture Hazards Zones in California, or located within any other area with substantial evidence of a known fault.
- 6(a)(ii) No structures or human occupancy are proposed.
- 6(a)(iii) A portion of the project site is within a “Potential Liquefaction Area” as identified in the County Guidelines for Determining Significance for Geologic Hazards. However, no structures or human occupancy are proposed.
- 6(a)(iv) A portion of the site is located within a “Landslide Susceptibility Area” as identified in the County Guidelines for Determining Significance for Geologic Hazards; however, no structures or human occupancy are proposed.
- 6(b) The project will not result in substantial soil erosion or the loss of topsoil because the project will be required to comply with the Watershed Protection Ordinance (WPO) and Grading Ordinance which will ensure that the project would not result in any unprotected erodible soils, will not alter existing drainage patterns, and will not develop steep slopes. Additionally, the project will be required to implement Best Management Practices (BMPs) to prevent fugitive sediment.
- 6(c) The project is not located on or near geological formations that are unstable or would potentially become unstable as a result of the project. In addition, no structures or human occupancy are proposed.
- 6(d) The project will not result in a significant impact because no structures or human occupancy are proposed.
- 6(e) No septic tanks or alternative wastewater disposal systems are proposed.

Conclusion

As discussed above, the project would not result in any significant impacts to/from geology/soils; therefore, the project would not result in an impact which was not adequately evaluated by the GPU EIR.

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
7. Greenhouse Gas Emissions – Would the Project:			
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with an applicable plan, policy or regulation	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

adopted for the purpose of reducing the emissions of greenhouse gases?

Discussion

7(a) The project would produce GHG emissions through construction activities. However, the project falls below the screening criteria that were developed to identify project types and sizes that would have less than cumulatively considerable GHG emissions (i.e., the project would result in less than 50 single-family residential units).

The San Diego County Recommended Approach for Addressing Climate Change (2015) uses screening thresholds for determining the need for additional analysis. Screening thresholds are recommended based on various land use densities and project types. Projects that meet or fall below the screening thresholds are expected to result in 900 MT/year of GHG emissions or less and would not require additional analysis.

The project includes 80,000 cubic yards of balanced cut and fill for creation of a mitigation bank, with only negligible operational emissions. For projects of this size, it is presumed that the construction and operational GHG emissions would not exceed 900 MT CO2e per year, and there would be a less-than cumulatively considerable impact. This assumes that the project does not involve unusually extensive construction and does not involve operational characteristics that would generate unusually high GHG emissions.

7(b) As described above, the project would not result in a cumulatively considerable contribution to global climate change. As such, the project would be consistent with County goals and policies included in the County General Plan that address greenhouse gas reductions. Therefore, the project would be consistent with emissions reduction targets of Assembly Bill 32, the Global Warming Solutions Act. Thus, the project would not conflict with any applicable plan, policy or regulation adopted for the purpose of reducing emissions of greenhouse gas emissions.

Conclusion

As discussed above, the project would not result in any significant impacts to greenhouse gas emissions; therefore, the project would not result in an impact which was not adequately evaluated by the GPU EIR.

8. Hazards and Hazardous Materials – Would the Project:

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

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

Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
---	---	--

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

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

e) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

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

g) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

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

Discussion

8(a) The project will not create a significant hazard to the public or the environment because it does not propose the storage, use, transport, emission, or disposal of Hazardous Substances, nor are Hazardous Substances proposed or currently in use in the immediate vicinity. In addition, the project does not propose to demolish any existing structures onsite which could produce a hazard related to the release of asbestos, lead based paint or other hazardous materials.

8(b) The project is not located within one-quarter mile of an existing or proposed school.

8(c) Based on a comprehensive review of regulatory databases (see attached Hazards/Hazardous Materials references) and a Phase I ESA prepared by Eric Smith of AECOM (August 22, 2014), the project site has not been subject to a release of hazardous substances. Additionally, the project does not propose structures for human occupancy or significant linear excavation within 1,000 feet of an open, abandoned, or closed landfill, is not located on or within 250 feet of the boundary of a parcel identified as containing burn ash (from the historic burning of trash), and is not on or within 1,000 feet of a Formerly Used Defense Site.

- 8(d) The proposed project is not located within an Airport Land Use Compatibility Plan (ALUCP), an Airport Influence Area, or a Federal Aviation Administration Height Notification Surface. Also, the project does not propose construction of any structure equal to or greater than 150 feet in height, constituting a safety hazard to aircraft and/or operations from an airport or heliport.
- 8(e) The proposed project is not within one mile of a private airstrip.
- 8(f)(i) OPERATIONAL AREA EMERGENCY PLAN AND MULTI-JURISDICTIONAL HAZARD MITIGATION PLAN: The project will not interfere with this plan because it will not prohibit subsequent plans from being established or prevent the goals and objectives of existing plans from being carried out.
- 8(f)(ii) SAN DIEGO COUNTY NUCLEAR POWER STATION EMERGENCY RESPONSE PLAN: The property is not within the San Onofre emergency planning zone.
- 8(f)(iii) OIL SPILL CONTINGENCY ELEMENT: The project is not located along the coastal zone.
- 8(f)(iv) EMERGENCY WATER CONTINGENCIES ANNEX AND ENERGY SHORTAGE RESPONSE PLAN: The project would not alter major water or energy supply infrastructure which could interfere with the plan.
- 8f)(v) DAM EVACUATION PLAN: The project is not located within a dam inundation zone.
- 6(g) The proposed project is adjacent to wildlands that have the potential to support wildland fires. However, the project will not expose people or structures to a significant risk of loss, injury or death involving wildland fires because no structures or human occupancy are proposed.
- 6(h) The project does not involve or support uses that would allow water to stand for a period of 72 hours or more (e.g. artificial lakes, agricultural ponds). Also, the project does not involve or support uses that will produce or collect animal waste, such as equestrian facilities, agricultural operations (chicken coops, dairies etc.), solid waste facility or other similar uses. Moreover, based on a site visit conducted by County staff, there are none of these uses on adjacent properties.

Conclusion

As discussed above, the project would not result in any significant impacts to/from hazards/hazardous materials; therefore, the project would not result in an impact which was not adequately evaluated by the GPU EIR.

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
9. Hydrology and Water Quality – Would the Project:			
a) Violate any waste discharge requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Is the project tributary to an already impaired water body, as listed on the Clean Water Act Section 303(d) list?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

If so, could the project result in an increase in any pollutant for which the water body is already impaired?

c) Could the proposed project cause or contribute to an exceedance of applicable surface or groundwater receiving water quality objectives or degradation of beneficial uses?

d) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?

e) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?

f) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

g) Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems?

h) Provide substantial additional sources of polluted runoff?

i) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map, including County Floodplain Maps?

j) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?

k) Expose people or structures to a significant risk of loss, injury or death involving flooding?

l) Expose people or structures to a significant risk of loss, injury or death involving flooding as a result of the failure of a levee or dam?

m) Inundation by seiche, tsunami, or mudflow?

Discussion

- 9(a) The project will require a NPDES General Permit for Discharges of Storm Water Associated with Construction Activities. The project applicant has provided a Stormwater Management Plan (SWMP) which demonstrates that the project will comply with all requirements of the WPO. The project will be required to implement site design measures, source control BMPs, and/or treatment control BMPs to reduce potential pollutants to the maximum extent practicable. These measures will enable the project to meet waste discharge requirements as required by the San Diego Municipal Permit, as implemented by the San Diego County Jurisdictional Urban Runoff Management Program (JURMP) and Standard Urban Storm Water Mitigation Plan (SUSMP).
- 9(b) The project lies in the Valley Center (903.14) hydrologic subarea, within the San Luis Rey hydrologic unit. According to the Clean Water Act Section 303(d) list, portions of this watershed including the lower San Luis Rey River are impaired for nutrients, pathogens, salinity, and toxicity. The project could contribute to release of these pollutants; however, the project will comply with the WPO and implement site design measures, source control BMPs, and treatment control BMPs to prevent a significant increase of pollutants to receiving waters.
- 9(c) As stated in responses 9(a) and 9(b) above, implementation of BMPs and compliance with required ordinances will ensure that project impacts are less than significant.
- 9(d) The project will obtain its water supply from groundwater. The use of water will be for temporary irrigation during the five year monitoring period of the revegetation areas, and is not expected to deplete groundwater since the proposed plants are all native and should not require excessive amounts of water. In addition, the project does not involve operations that would interfere substantially with groundwater recharge.
- 9(e) As outlined in the project's SWMP, the project will implement source control and/or treatment control BMP's to reduce potential pollutants, including sediment from erosion or siltation, to the maximum extent practicable from entering storm water runoff.
- 9(f) The project will not significantly alter established drainage patterns or significantly increase the amount of runoff for the following reasons: based on a Drainage Study prepared by Jayne Janda-Timba of Rick Engineering on February 4, 2015, drainage will be conveyed to either natural drainage channels or approved drainage facilities.
- 9(g) The project does not propose to create or contribute runoff water that would exceed the capacity of existing or planned storm water drainage systems.
- 9(h) The project has the potential to generate pollutants; however, site design measures, source control BMPs, and treatment control BMPs will be employed such that potential pollutants will be reduced to the maximum extent practicable.
- 9(i) The project does not propose any housing.
- 9(j) The project does not propose any structures.
- 9(k) The project does not include any structures or human occupancy.

9(l) The project site lies outside a mapped dam inundation area for a major dam/reservoir within San Diego County. In addition, the project is not located immediately downstream of a minor dam that could potentially flood the property.

9(m)(i) SEICHE: The project site is not located along the shoreline of a lake or reservoir.

9(m)(ii) TSUNAMI: The project site is not located in a tsunami hazard zone.

9(m)(iii) MUDFLOW: Mudflow is type of landslide. See response to question 6(a)(iv).

Conclusion

As discussed above, the project would not result in any significant impacts to/from hydrology/water quality; therefore, the project would not result in an impact which was not adequately evaluated by the GPU EIR.

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
10. Land Use and Planning – Would the Project:			
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion

10(a) The project does not propose the introduction of new infrastructure such as major roadways, water supply systems, or utilities to the area.

10(b) The project would not conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect, including policies of the General Plan and Community Plan.

Conclusion

As discussed above, the project would not result in any significant impacts to land use/planning; therefore, the project would not result in an impact which was not adequately evaluated by the GPU EIR.

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
11. Mineral Resources – Would the Project:			
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

general plan, specific plan or other land use plan?

11(a) The project site has been classified by the California Department of Conservation – Division of Mines and Geology as MRZ-3, Resource Potentially Present. However, there are numerous homes just across Betsworth Road which are incompatible to future extraction of mineral resources on the project site. A future mining operation at the project site would likely create a significant impact to neighboring properties for issues such as noise, air quality, traffic, and possibly other impacts. Therefore, the project will not result in the loss of a known mineral resource because the resource has already been lost due to incompatible land uses.

11(b) The project site is not located in an Extractive Use Zone (S-82), nor does it have an Impact Sensitive Land Use Designation (24) with an Extractive Land Use Overlay (25).

Conclusion

As discussed above, the project would not result in any significant impacts to mineral resources; therefore, the project would not result in an impact which was not adequately evaluated by the GPU EIR.

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
12. Noise – Would the Project:			
a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion

- 12(a) The project is a grading plan to create a mitigation bank. Based on the Noise Analysis prepared by LDN Consulting dated August 19, 2014, the project would not expose people to potentially significant noise levels that exceed the allowable limits of the County of San Diego General Plan, County of San Diego Noise Ordinance, and other applicable standards for the following reasons:

General Plan – Noise Element: Policy 4b addresses noise sensitive areas and requires projects to comply with a Community Noise Equivalent Level (CNEL) of 60 decibels (dBA). Projects which could produce noise in excess of 60 dB(A) are required to incorporate design measures or mitigation as necessary to comply with the Noise Element. Based on a review of the County's noise contour maps, the project is not expected to expose existing or planned noise sensitive areas to noise in excess of 60 dB(A).

Noise Ordinance – Section 36-404: Non-transportation noise generated by the project is not expected to exceed the standards of the Noise Ordinance at or beyond the project's property line. The project is a grading plan and does not propose any permanent noise sources. Therefore, the project's noise levels at the adjoining properties will not exceed County Noise Standards.

Noise Ordinance – Section 36-410: The project will not generate construction noise in excess of Noise Ordinance standards. Construction operations will occur only during permitted hours of operation. Also, it is not anticipated that the project will operate construction equipment in excess of an average sound level of 75dB between the hours of 7 AM and 7 PM.

- 12(b) The project does not propose uses that can be impacted by groundborne vibration or groundborne noise levels. Also, the project does not propose any major, new or expanded infrastructure such as mass transit, highways or major roadways or intensive extractive industry that could generate excessive groundborne vibration or groundborne noise levels on-site or in the surrounding area.

- 12(c) The project is for a grading plan and would result in temporary noise from construction equipment operations. No permanent noise sources that would exceed County noise standards are associated with the project. Grading plans typically do not support any permanent noise-generating equipment. Therefore, the project would not result in a substantial permanent increase in existing ambient noise levels in the project vicinity.

- 12(d) The project does not involve any uses that may create substantial temporary or periodic increases in ambient noise levels in the project vicinity including but not limited to extractive industry; outdoor commercial or industrial uses that involve crushing, cutting, drilling, grinding, or blasting of raw materials; truck depots, transfer stations or delivery areas; or outdoor sound systems.

Also, general construction noise is not expected to exceed the construction noise limits of the County of San Diego Noise Ordinance (Section 36.409), which are derived from State regulations to address human health and quality of life concerns. Construction operations will occur only during permitted hours of operation pursuant to Section 36.409. It is not anticipated that the project will operate construction equipment in excess of 75 dB for more than an 8 hours during a 24-hour period.

The project is a grading plan to create conservation back of approximately 226 acres of land. No material export or import is proposed. The project is subject to the County

Noise Ordinance which governs temporary construction noise thresholds to 75 dBA 8-hour Leq at any occupied boundary line. The closest residence is located to the north and to the east of the project across Betsworth Road. To the south is an airport with no existing noise sensitive receptors. There is no blasting or rock crushing proposed as part of this project. Anticipated equipment during the earthwork operations include loader, scrapers grader, dozer and water trucks. Grading activities are anticipated to approximately 8 weeks and equipment would be spread out over the site working in different areas. No construction equipment would be located in one location for a long period of time. Due to construction noise to be temporary in nature, large setback distance from the center of the site to the occupied neighboring properties, and no proposed use of impulsive type of construction equipment, project related construction noise is not anticipated to exceed the 75 dBA eight hour average requirement pursuant to the County Noise Ordinance. Therefore, the project would not result in a substantial temporary or periodic increase in existing ambient noise levels in the project vicinity.

12(e) The project is not located within an Airport Land Use Compatibility Plan (ALUCP) for airports or within 2 miles of a public airport or public use airport.

12(f) The project is not located within a one-mile vicinity of a private airstrip.

Conclusion

As discussed above, the project would not result in any significant impacts to/from noise; therefore, the project would not result in an impact which was not adequately evaluated by the GPU EIR.

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
13. Population and Housing – Would the Project:			
a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion

13(a) The project will not induce substantial population growth in an area because the project does not propose any physical or regulatory change that would remove a restriction to or encourage population growth in an area.

13(b) The project will not displace existing housing.

13(c) The proposed project will not displace a substantial number of people since the site is currently vacant.

Conclusion

As discussed above, the project would not result in any significant impacts to populations/housing; therefore, the project would not result in an impact which was not adequately evaluated by the GPU EIR.

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
--	---	---	--

14. Public Services – Would the Project:

a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance service ratios for fire protection, police protection, schools, parks, or other public facilities?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
--------------------------	--------------------------	--------------------------

Discussion

14(a) Because no homes are proposed, the project would not result in the need for significantly altered services or facilities.

Conclusion

As discussed above, the project would not result in any significant impacts to public services; therefore, the project would not result in an impact which was not adequately evaluated by the GPU EIR.

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
--	---	---	--

15. Recreation – Would the Project:

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

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
--------------------------	--------------------------	--------------------------

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

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
--------------------------	--------------------------	--------------------------

Discussion

15(a) The project would not increase the use of existing parks and other recreational facilities because it will have no residents.

15(b) The project does not include recreational facilities.

Conclusion

As discussed above, the project would not result in any significant impacts to recreation; therefore, the project would not result in an impact which was not adequately evaluated by the GPU EIR.

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
16. Transportation and Traffic – Would the Project:			
a) Conflict with an applicable plan, ordinance or policy establishing measures of the effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths and mass transit?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion

16(a) The project will not produce measureable ADT because none of the long-term management tasks require daily visits. The most frequent visits, for weeding and trash removal, are quarterly. Therefore the project will not conflict with any established performance measures because the project trips do not exceed the thresholds established by County guidelines. In addition, the project would not conflict with policies related to non-motorized travel such as mass transit, pedestrian or bicycle facilities.

16(b) The trips from the project do not exceed the 2400 trips (or 200 peak hour trips) required for study under the region’s Congestion Management Program as developed by SANDAG.

- 16(c) The proposed project is located outside of an Airport Influence Area and is not located within two miles of a public or public use airport.
- 16(d) The proposed project will not alter traffic patterns, roadway design, place incompatible uses (e.g., farm equipment) on existing roadways, or create curves, slopes or walls which would impede adequate sight distance on a road.
- 16(e) There are no structures or occupancy proposed requiring emergency access.
- 16(f) The project will not result in the construction of any road improvements or new road design features that would interfere with the provision of public transit, bicycle or pedestrian facilities. In addition, the project does not generate sufficient travel demand to increase demand for transit, pedestrian or bicycle facilities.

Conclusion

As discussed above, the project would not result in any significant impacts to transportation/traffic; therefore, the project would not result in an impact which was not adequately evaluated by the GPU EIR.

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
17. Utilities and Service Systems – Would the Project:			
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project’s projected demand in addition to the provider’s existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) Be served by a landfill with sufficient permitted capacity to accommodate the project’s solid waste disposal needs?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

g) Comply with federal, state, and local statutes and regulations related to solid waste?

Discussion

17(a) The project would not generate wastewater.

17(b) The project would not generate wastewater. Water would be provided from on-site wells and not by extension of municipal water lines.

17(c) The project does not include new permanent storm water drainage facilities.

17(d) The project will not use water beyond the five year vegetation establishment period.

17(e) The project will not generate wastewater.

17(f) All solid waste facilities, including landfills require solid waste facility permits to operate. There are five, permitted active landfills in San Diego County with remaining capacity to adequately serve the project.

17(g) The project will deposit all solid waste at a permitted solid waste facility.

Conclusion

As discussed above, the project would not result in any significant impacts to utilities and service systems; therefore, the project would not result in an impact which was not adequately evaluated by the GPU EIR.

Attachments:

Appendix A – References

Appendix B – Summary of Determinations and Mitigation within the Final Environmental Impact Report, County of San Diego General Plan Update, SCH # 2002111067

Appendix A

The following is a list of project specific technical studies used to support the analysis of each potential environmental effect:

Vincent N. Scheidt (July 2015). A Biological Resources Survey Report for the Brook Forest Conservation / Mitigation Bank Project.

Brian F. Smith and Associates, Inc., Brian F. Smith (December 11, 2014). CEQA and Section 106 (NHPA) Cultural Resources Study for the Brook Forest Conservation Bank Project.

Rick Engineering Company, Jayne Janda-Timba (February 4, 2015). Final Design Onsite Drainage Study for Brook Forest Wetland Mitigation Bank.

Jodi Schnoebelen (February 21, 2014). Minor Stormwater Management Plan.

James Chagala and Associates, James Chagala (March 1, 2015). Agricultural Analysis.

Ldn Consulting, Inc., Jeremy Loudon (August 19, 2014). Noise Construction Findings – Brook Forest Conservation Bank Development San Diego County.

AECOM, Eric Smith (August 22, 2014). Phase I Environmental Site Assessment of 226 Acres of Undeveloped Land, 13049 Betsworth Road, Valley Center, California.

For a complete list of technical studies, references, and significance guidelines used to support the analysis of the General Plan Update Final Certified Program EIR, dated August 3, 2011, please visit the County's website at:

http://www.sdcounty.ca.gov/PDS/gpupdate/docs/BOS_Aug2011/EIR/FEIR_5.00_-_References_2011.pdf

Appendix B

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

http://www.sdcounty.ca.gov/pds/gpupdate/GPU_FEIR_Summary_15183_Reference.pdf