

**DRAFT FINAL ENVIRONMENTAL IMPACT REPORT (~~D~~FEIRFEIR)**

**Project DEIRFEIR  
Hoskings Ranch Tentative Map  
PDS2003 3100-5312 (TM) , PDS2003 3910-03-10-005 (ER)  
State Clearinghouse (SCH) Number 2003081154**

**Lead Agency:**

**County of San Diego  
Department of Planning and Development Services (PDS)  
5510 Overland Avenue, Suite 310  
San Diego, CA 92123**

**November 2015**





**~~DRAFT-FINAL~~ ENVIRONMENTAL IMPACT REPORT (~~DEIR~~FEIR)**

Project **~~DEIR~~FEIR**  
Hoskings Ranch Tentative Map  
PDS2003 3100-5312 (TM) , PDS2003 3910-03-10-005 (ER)  
State Clearinghouse (SCH) Number 2003081154

**Lead Agency:**

County of San Diego  
Department of Planning and Development Services (PDS)  
5510 Overland Avenue, Suite 310  
San Diego, CA 92123  
Contact: Dennis Campbell, PDS Project Manager  
858-505-6380

**Preparer:**

Mark Thompson  
TRS Consultants  
~~438 Camino del Rio South Suite 233~~  
~~San Diego, CA 92108~~ PO Box 2057  
Imperial Beach, CA 91933

**Project Proponent:**

Lettie Flowers  
Genesee Properties  
3550 General Atomics Ct.  
San Diego, CA 92121-0122

**November 2015**



## TABLE OF CONTENTS

SUMMARY .....	1
S.1 PROJECT SYNOPSIS .....	1
S.2 SUMMARY OF SIGNIFICANT EFFECTS AND MITIGATION MEASURES THAT REDUCE OR AVOID THE SIGNIFICANT EFFECTS .....	1
S.3 AREAS OF CONTROVERSY .....	2
S.4 ISSUES TO BE RESOLVED BY THE DECISION-MAKING BODY .....	2
S.5 PROJECT ALTERNATIVES .....	3
S.6 LIST OF PERSONS, ORGANIZATIONS, AND PUBLIC AGENCIES THAT COMMENTED ON THE DRAFT ENVIRONMENTAL IMPACT REPORT (DEIR) .....	4
CHAPTER 1.0 PROJECT DESCRIPTION AND ENVIRONMENTAL SETTING .....	1-1
1.1 Project Objectives .....	1-1
1.2 Project Description .....	1-1
1.2.1 Project's Component Parts .....	1-1
1.2.2 DFEIR/FEIR Technical, Economic, Environmental Characteristics .....	1-5
1.3 Project Location .....	1-7
1.3.1 Regional Setting .....	1-7
1.3.2 Environment On-site and in the Immediate Vicinity .....	1-9
1.4 Intended Uses of the DFEIR/FEIR .....	1-10
1.4.1 Matrix of Project Approvals/Permits .....	1-11
1.4.2 Related Environmental Review and Consultation Requirements .....	1-11
1.5 Project Inconsistencies with Applicable Regional and General Plans .....	1-11
1.6 List of Past, Present, and Reasonably Anticipated Future Projects in the Project Area .....	1-11
1.7 Energy Conservation .....	1-12
1.8 Growth-Inducing Effects .....	1-17
CHAPTER 2.0 SIGNIFICANT ENVIRONMENTAL EFFECTS OF THE PROPOSED PROJECT ....	2-1
2.1 Biology .....	2-1
2.1.1 Existing Conditions .....	2-1
2.1.2 Analysis of Project Effects and Determination as to Significance .....	2-5
2.1.3 Cumulative Impact Analysis .....	2-22
2.1.4 Significance of Impacts Prior to Mitigation .....	2-25
2.1.5 Mitigation .....	2-27
2.1.6 Conclusion .....	2-31
2.2 Cultural Resources .....	2-33
2.2.1 Existing Conditions .....	2-33
2.2.2 Analysis of Project Effects and Determination as to Significance .....	2-34
2.2.3 Cumulative Impact Analysis .....	2-37
2.2.4 Significance of Impact Prior to Mitigation .....	2-39
2.2.5 Mitigation .....	2-40
2.2.6 Conclusion .....	2-40
2.3 Traffic .....	2-43
2.3.1 Existing Conditions .....	2-43
2.3.2 Analysis of Project Effects and Determination as to Significance .....	2-44
2.3.3 Cumulative Impacts .....	2-50
2.3.4 Significance of Impacts Prior to Mitigation .....	2-51
2.3.5 Mitigation .....	2-51
2.3.6 Conclusion .....	2-51
CHAPTER 3.0 ENVIRONMENTAL EFFECTS FOUND NOT TO BE SIGNIFICANT .....	3-1
3.1 Effects Found Not Significant as Part of the DFEIR/FEIR Process .....	3-1

3.1.1	Visual Resources.....	3-1
3.1.2	Agricultural Resources .....	3-8
3.1.3	Air Quality/Global Climate Change .....	3-16
3.1.4	Geologic Resources .....	3-38
3.1.5	Groundwater Resources .....	3-45
3.1.6	Fire Hazard .....	3-53
3.1.7	Surface Water Resources .....	3-62
3.1.8	Noise.....	3-74
CHAPTER 4.0	PROJECT ALTERNATIVES .....	4-1
4.1	<u>Rationale for Alternative Selection</u> .....	4-1
4.2	<u>No Development Alternative (NDA)</u> .....	4-1
4.2.1	Analysis of NDA Effects.....	4-2
4.3	<u>No Project/Legal Lot Alternative (NPLL)</u> .....	4-3
4.3.1	Analysis of NPLL Effects .....	4-3
4.4	<u>Reduced Project Alternative (RPA)</u> .....	4-5
4.4.1	Analysis of RPA Effects.....	4-5
4.5	<u>Consolidated Project Alternative</u> .....	4-7
4.5.1	Analysis of CPA Significant Effects.....	4-9
4.6	<u>Environmentally Superior Alternative</u> .....	4-34
CHAPTER 5.0	REFERENCES .....	5-1
CHAPTER 6.0	LIST OF <del>DFEIR</del> FEIR PREPARERS AND PERSONS AND ORGANIZATIONS CONTACTED .....	6-1
CHAPTER 7.0	LIST OF MITIGATION MEASURES AND ENVIRONMENTAL DESIGN CONSIDERATIONS .....	7-1
7.1	<u>Biology 2.1</u> .....	7-1
7.1.1	Mitigation.....	7-1
7.1.2	Design Considerations .....	7-4
7.2	<u>Cultural Resources 2.2</u> .....	7-5
7.2.1	Mitigation.....	7-5
7.2.2	Design Considerations .....	7-5
7.3	<u>Traffic 2.3</u> .....	7-6
7.3.1	Mitigation.....	7-6
7.3.2	Design Considerations .....	7-6
7.4	<u>Visual Resources 3.1.1</u> .....	7-6
7.4.1	Design Considerations .....	7-6
7.5	<u>Agricultural Resources 3.1.2</u> .....	7-6
7.5.1	Design Considerations .....	7-6
7.6	<u>Air Quality/Climate Change 3.1.3</u> .....	7-7
7.6.1	Design Considerations .....	7-7
7.7	<u>Geologic Resources 3.1.4</u> .....	7-10
7.7.1	Design Considerations .....	7-10
7.8	<u>Groundwater Resources 3.1.5</u> .....	7-10
7.8.1	Design Considerations .....	7-10
7.9	<u>Fire Hazard 3.1.6</u> .....	7-10
7.9.1	Design Considerations .....	7-10
7.10	<u>Surface Water Resources 3.1.7</u> .....	7-13
7.10.1	Design Considerations .....	7-13
7.11	<u>Noise 3.1.8</u> .....	7-14
7.11.1	Design Considerations .....	7-14

## LIST OF FIGURES

Figure No.	Title
<b>SUMMARY</b>	
Figure S-1	Regional Vicinity Map
Figure S-2	Aerial Photograph
<b>CHAPTER 1</b>	
Figure 1-1	Project Tentative Map
Figure 1-2	Offsite Impacts
Figure 1-3	Close-up of Proposed Open Space Vacations on Primary Project Design
Figure 1-4	Secondary Access
Figure 1-5	USGS Quadrangle Map
Figure 1-6	Surrounding Land Uses
Figure 1-7	Master Cumulative Impacts Map
Figure 1-8A	Cumulative Impacts Map
Figure 1-8B	Cumulative Impacts Map
Figure 1-8C	Cumulative Impacts Map
Figure 1-8D	Cumulative Impacts Map
Figure 1-8E	Cumulative Impacts Map
<b>CHAPTER 2</b>	
Figure 2-1-1A	Biological Resources Map – West
Figure 2-1-1B	Biological Resources Map – Central
Figure 2-1-1C	Biological Resources Map – East
Figure 2-1-2	Existing Open Space Easements and Associated Biology
Figure 2-1-3	Wetland Delineation
Figure 2-1-4	Rare Plant Survey
Figure 2-1-5	Open Space, Fencing and Signage Plan
Figure 2-1-6	Proposed Project – RPO Encroachments
Figure 2-3-1	Existing Circulation Network
Figure 2-3-2	Project Trip Distribution
Figure 2-3-3	Sight Distance Constraints
<b>CHAPTER 3</b>	
Figure 3-1-1	Topographic Viewshed
Figure 3-1-2	Key View Index
Figure 3-1-3	Key Views 1 and 2: SR 78/79 Plan and Profile, Looking East
Figure 3-1-4	Key View 3: SR 78/79 Looking West
Figure 3-1-5	Key View 4: Looking North from Pine Hills Residential Area
Figure 3-1-6	Key View 5: From Southeast Corner of Project Looking North on Pine Hills Road
Figure 3-1-7	Key View 6: Looking Northwest from Pine Hills Road
Figure 3-1-8	Key Views 7 and 8: From Pine Hills Road
Figure 3-1-9	Key View 9: Looking West from Van Duesen Road

~~Figure 3-1-10~~ ~~Fire Station Location, Looking West Along SR 78/79~~

~~Figure 3-1-11~~ ~~Fire Station Location, Plan View~~

Figure 3-1-~~12-10~~ Key Views Photosimulation Looking East on SR 78/79

Figure 3-1-~~13-11~~ Key View 4: Photosimulation

Figure 3-1-~~14-12~~ Cumulative Projects Map

Figure 3-2-1 Site on Farmland Mapping and Monitoring Program Map

Figure 3-2-2 Farmland Mapping and Monitoring Program Map Legend

Figure 3-2-3 Cumulative Projects on Farmland Mapping and Monitoring Program Map

Figure 3-5-1 Groundwater Study Area and Well Locations

Figure 3-6-1 Typical Fire Clearing Design

Figure 3-7-1 Noise Measurement Locations

Figure 3-7-2 Future Noise Level Contours

## CHAPTER 4

Figure 4-3-1 No Project Legal Lot Alternative

Figure 4-4-1 Reduced Project Alternative

Figure 4-5-1 Consolidated Project Alternative

Figure 4-5-2 Consolidated Project Alternative Open Space

Figure 4-5-3 Open Space, Signage, and Fencing Plan for Consolidated Project Alternative

Figure 4-5-4 Close-up of Proposed Open Space Vacations on Consolidated Project Alternative

Figure 4-5-5 Key View Index

Figure 4-5-6 Key Views 1 and 2, SR78/79, Plan and Profile, Looking East

Figure 4-5-7 Key Views 1 and 2, Photosimulation, SR78/79, Looking East

Figure 4-5-8 Key View 3, SR78/79 Looking West

Figure 4-5-9 Key View 4, Looking North from Pine Hills Residential Area

Figure 4-5-10 Key View 4, Photosimulation

Figure 4-5-11 Key View 5, From Southeast Corner of Project

Figure 4-5-12 Key View 6, Looking Northwest from Pine Hills Road

Figure 4-5-13 Key View 7 and Key View 8, From Pine Hills Road

Figure 4-5-14 Key View 9, Looking West from Van Duesen Road

Figure 4-5-15 Key View 10, Looking North on Pine Hills Road

~~Figure 4-5-16~~ ~~Fire Station Location, Looking West along SR78/79~~

~~Figure 4-5-17~~ ~~Fire Station Location, Plan View~~

Figure 4-~~56-18A-16A~~ Consolidated Project Alternative Biological Resources – West

Figure 4-~~56-18B-16B~~ Consolidated Project Alternative Biological Resources – Central

Figure 4-~~56-18C-16C~~ Consolidated Project Alternative Biological Resources – East

Figure 4-~~56-19-17~~ Consolidated Project Alternative – RPO Encroachments

Back Pocket: Project on Biological Resources Map

Consolidated Project Alternative on Biological Resources Map

## LIST OF TABLES

### Table No.

### Title

#### SUMMARY

Table S-1	Summary of Significant Effects and Mitigation Measures that Reduce or Avoid the Significant Effects
Table S-2	Comparison of Project Alternative Impacts to Significant Proposed Project Impacts

#### CHAPTER 1

Table 1-1	Cumulative Projects
<u>Table 1-2</u>	<u>Project Energy Use by Energy Types and Use Categories (In text table)</u>
<u>Table 1-3</u>	<u>Title 23 2014: Selected Energy Efficiency Requirements(In text table)</u>

#### CHAPTER 2

Table 2-1-1	Biological Impact Table
Table 2-2-1	Historical Resources (CEQA)
Table 2-2-2	Historical Resources (RPO)
Table 2-2-3	Historical/Archaeological Resources (CEQA)
Table 2-2-4	Archaeological Resources (CEQA)
Table 2-3-1	Project Trip Generation
Table 2-3-2	Existing Plus Project Roadway Segment Conditions
Table 2-3-3	Allowable Increase of Congested Intersections
Table 2-3-4	Existing Plus Project Intersection Conditions
Table 2-3-5	Existing Configuration Sight Distance Summary

#### CHAPTER 3

Table 3-2-1	Cumulative Project List
Table 3-3-1	Maximum Daily Emissions Thresholds
Table 3-3-2	Summary of Construction Emissions (Pounds Per Day) With Project Design Considerations
Table 3-3-3	Quantification of Carcinogenic Risks and Noncarcinogenic Hazards (Short-Term Construction Activity)
Table 3-3-4	Summary of Operational Emissions
Table 3-3-5	<u>Expected</u> Greenhouse Gas <u>CO<sub>2</sub>e</u> Emissions <u>Summary</u> <del>(Metric Tons Per Year)</del>
<u>Table 3-3-6</u>	<u>Expected Greenhouse Gas Operational Emissions Summary</u>
Table 3-5-1	Anticipated Groundwater Needs at Maximum Buildout
Table 3-8-1	San Diego County Code Section 36.404 Sound Level Limits in Decibels (dBA)
Table 3-8-2	San Diego County Code Section 36.410 Maximum Sound Level (Impulsive) Measured at Occupied Property in Decibels (dBA)
Table 3-8-3	San Diego County Code Section 36.410 Maximum Sound Level (Impulsive) Measured at Occupied Property in Decibels (dBA) for Public Road Projects

## **CHAPTER 4**

Table 4-2-1	Biological Impact Table – Consolidated Project Alternative
Table 4-2-2	Comparison of the CPA and the Project
Table 4-2-3	Traffic Analysis Summary



## LIST OF SUBJECT-AREA APPENDICES

<b>Appendix A</b>	A Biological Resources Survey Report for the Hoskings Ranch Project TM RPL3 and Consolidated Project Alternative, July 2013. by Vincent N. Scheidt
<b>Appendix B</b>	Hoskings Ranch TM 5312, Log. No. 03-10-005, Draft Conservation Grazing Management Plan, May 2013 by Vincent N. Scheidt and Mark H. Thompson
<b>Appendix C</b>	Cultural Resources Assessment for the Hoskings Ranch Project, Julian San Diego County, California TM 5312RPL3, Log No. 03-10-005, Revised July 2013 by Affinis
<b>Appendix D</b>	Hoskings Ranch Traffic Impact Study TM 5312, September 2012 by KOA Corporation
<b>Appendix E</b>	Visual Resources Impact Report for Hoskings Ranch, Log No. 03-10-005, July 2013 by TRS Consultants
<b>Appendix F</b>	Agricultural Conversion Analysis for Hoskings Ranch TM 5312RPL <sup>3</sup> , ER# 03-10-005, June 2013 by TRS Consultants
<b>Appendix G</b>	Lot by Lot Analysis of the Agricultural Capacity of a 24-Lot Design for Hoskings Ranch TM5312 RPL3, Log No. 03-10-005, March 2013 by TRS Consultants
<b>Appendix H</b>	Air Quality Study, Hoskings Ranch, TM 5312, Log No.03-10-005, October 31, 2011 by Urban Crossroads, Inc
<b>Appendix I</b>	Global Climate Change Analysis, Hoskings Ranch TM 5312 <del>RPL2, Log No. 03-10-005</del> , <u>October 22, 2015</u> <del>April 10, 2012</del> by Urban Crossroads, Inc.
<b>Appendix J</b>	Geologic Reconnaissance Study, 1,416.5-Acre Hoskings Ranch, Julian San Diego County, California, February 2011 by AECOM
<b>Appendix K</b>	Final Hydrogeologic Investigation, 1,416.5-Acre Hoskings Ranch, Julian, San Diego County, California, April 2012 by AECOM
<b>Appendix L</b>	Fire Protection Plan, Hoskings Ranch TM5312 RPL2/3, February 10, 2013 by Lamont Landis
<b>Appendix M</b>	CEQA Level Preliminary Drainage Analysis, Hoskings Ranch TM 5312RPL3, March 13, 2013 by Masson & Associates, Inc.
<b>Appendix N</b>	Major Stormwater Management Plan (Major SWMP), for Hoskings Ranch, Highway 78 and 79, Julian, San Diego County, California, TM 5312RPL3, March 13, 2013 by Masson & Associates, Inc.
<b>Appendix O</b>	Technical Memorandum: Design of IMPs for Hydromodification and Water Quality Purposes for The Hoskings Ranch Development, October 31, 2011. by Tori R. Walker Engineering, Inc.

<b>Appendix P</b>	Preliminary Noise Study, Hoskings Ranch Subdivision TM5312 RPL2, <del>February 21, 2011</del> <u>September 24, 2015</u> by Jeremy Loudon
<b>Appendix Q</b>	Agricultural Conversion Analysis for Hoskings Ranch 34-Lot Alternative TM 5312RPL <sup>3</sup> Alt, January 2013 by TRS Consultants
<b>Appendix R</b>	Technical Appendices Addendum to SWMP for 34-Lot Alternative Major Stormwater Management Plan / Hydro Modification, March 13, 2013 By Masson & Associates, Inc.
<b>Appendix S</b>	Visual Resources Impact Report for The Consolidated Project Alternative Hoskings Ranch, July 2013 by TRS Consultants
<b>Appendix T</b>	County of San Diego Notice of Preparation & Environmental Initial Study, August 24, 2003
<b>Appendix U</b>	County of San Diego NOP Comments, October 16, 2003
<b>Appendix V</b>	Confidential Appendices to Cultural Resources Assessment of the Hoskings Ranch, Revised July 2013 by Affinis

## LIST OF ABBREVIATIONS AND ACRONYMS

<b>AASHTO –</b>	Association of State Highway and Transportation Officials
<b>ACOE –</b>	United States Army Corps of Engineers
<b>AB –</b>	California Assembly Bill
<b>ADT –</b>	Average Daily Trips
<b>afy –</b>	Acre Feet Per Year
<b>AMSL –</b>	Above Mean Sea Level
<b>AP –</b>	Administrative Permit
<b>APCD –</b>	Air Pollution Control District
<b>APN –</b>	Assessor's Parcel Number
<b>A–P –</b>	Alquist–Priolo Fault
<b>AQMD –</b>	Air Quality Management District
<b>AWM –</b>	County Department of Agricultural Weights and Measures
<b>BA –</b>	Boundary Adjustment
<b>BAU –</b>	Business as Usual
<b>BMO –</b>	Biological Mitigation Organization
<b>BMP –</b>	Best Management Practices
<b>BP –</b>	Before the Present
<b>BRCA –</b>	Biological Resource Core Area
<b>CAA –</b>	Clean Air Act
<b>CAAQS –</b>	California Ambient Air Quality Standards
<b>CalEPA –</b>	California Environmental Protection Agency
<b>CALFIRE –</b>	California Department of Forestry and Fire Protection
<b>CALVENO –</b>	Caltrans Highway Design Manual California Vehicle Noise Emission Levels
<b>CAPCOA –</b>	California Air Pollution Control Officers Association
<b>CARB –</b>	California State Air Resources Board
<b>CBC –</b>	California Building Code
<b>CCR –</b>	California Code of Regulations
<b>CDFW –</b>	California Department of Fish and Wildlife
<b>CEQA –</b>	California Environmental Quality Act
<b>CESA –</b>	California Endangered Species Act
<b>CFR –</b>	Code of Federal Regulations
<b>CGMP –</b>	Conceptual Grazing Management Plan
<b>CMP –</b>	Congestion Management Plan
<b>CNEL –</b>	Community Noise Equivalent Level
<b>CNF –</b>	Cleveland National Forest
<b>CPA –</b>	Consolidated Project Alternative
<b>CPUC –</b>	California Public Utilities Commission
<b>CRWQCB –</b>	California Regional Water Quality Control Board
<b>CSD –</b>	County of San Diego
<b>CSS –</b>	Coastal Sage Scrub
<b>CWA –</b>	Clean Water Act
<b>CY –</b>	Cubic Yards
<b>dB –</b>	Decibels
<b>dBA –</b>	A-weighted Decibels
<b>DEH –</b>	Department of Environmental Health
<b>D<del>E</del>IR –</b>	Draft Environmental Impact Report
<b>DOC –</b>	<u>California Department of Conservation</u>

<b>DPS –</b>	County of San Diego Department of Planning and Development Services
<b>DPW –</b>	County of San Diego Department of Public Works
<b>DU –</b>	Dwelling Units
<b>ECA –</b>	Environmentally Constrained Area
<b>EPA –</b>	Environmental Protection Agency
<b>°F –</b>	Degrees Fahrenheit
<b>FCI –</b>	Forest Conservation Initiative
<b><u>FEIR –</u></b>	<u>Final Environmental Impact Report</u>
<b><u>FEMA –</u></b>	<u>Federal Emergency Management Agency</u>
<b>FESA –</b>	Federal Endangered Species Act
<b>FHWA –</b>	Federal Highway Administration
<b>FMMP –</b>	Farmland Mapping and Monitoring Program
<b>FMZ –</b>	Fuel Management Zone
<b>FPP –</b>	Fire Protection Plan
<b>FWS –</b>	U.S. Fish and Wildlife Service
<b>GCC –</b>	Global Climate Change
<b>GHG –</b>	Green House Gasses
<b>GP –</b>	General Plan
<b>GPA –</b>	General Plan Amendment
<b>GPM –</b>	Gallons Per Minute
<b>GWO –</b>	County of San Diego Ground Water Ordinance
<b>HABS/HAER –</b>	Historic American Building Survey/Historic American Engineering Record
<b>HAP –</b>	Hazardous Air Pollutants
<b>HCFC –</b>	Hydrochlorofluorocarbon
<b>HCP –</b>	Habitat Conservation Plan
<b>HGP –</b>	Historic General Plan
<b>HLP –</b>	Habitat Loss Permit
<b>HMP –</b>	Habitat Management Plan
<b>IFC –</b>	International Fire Code
<b>IMP –</b>	Integrated Management Practices
<b>JCFPD –</b>	Julian/Cuyamaca Fire Protection District
<b>JCP –</b>	Julian Community Plan
<b>LARA –</b>	Local Agricultural Resource Assessment Model
<b>LBZ –</b>	Limited Building Zone
<b>LCC –</b>	Land Capability Classification
<b>LCFS –</b>	Low Carbon Fuel Standard
<b>LE –</b>	Land Evaluation (score) Standards
<b>LID –</b>	Low Impact Development
<b>LOS –</b>	Level of Service
<b>MBTA –</b>	Migratory Bird Treaty Act
<b>MCAS –</b>	Marine Corp Air Station
<b>MCL –</b>	Maximum Contaminant Levels
<b>MEI –</b>	Maximum Exposed Individual
<b>7MOU –</b>	Memorandum of Understanding
<b>MPH –</b>	Miles Per Hour
<b>MSCP –</b>	Multiple Species Conservation Program
<b>MSL –</b>	Mean Sea Level
<b>MUP –</b>	Major Use Permit
<b>MWD –</b>	Municipal Water District
<b>NAAQS –</b>	National Ambient Air Quality Standards
<b><u>NAGPRA. --</u></b>	<u>Native American Graves Protection and Repatriation Act</u>

---

<b>NCCP –</b>	Natural Community Conservation Planning
<b>NCCPA –</b>	Natural Community Conservation Plan Act
<b>NDA –</b>	No Development Alternative
<b>NEPA –</b>	National Environmental Protection Act
<b>NFPA –</b>	National Fire Protection Association
<b>NOP –</b>	Notice of Preparation
<b>NPLL –</b>	No Project Legal Lot Alternative
<b>NRCS –</b>	Natural Resources Conservation Service
<b>NSLU –</b>	Noise Sensitive Land Uses
<b>OEHHA –</b>	California Environmental Protection Agency, Office of Environmental Health Hazard
<b>OPR –</b>	Governor's Office of Planning and Research
<b>OSE –</b>	Open Space Easement
<b>PAMA –</b>	Pre-Approved Mitigation Area
<b>PFE –</b>	Public Facility Element
<b>PM –</b>	Particulate Matter
<b>RAQS –</b>	Regional Air Quality Strategy
<b>REL –</b>	Reference Exposure Level
<b>RMP –</b>	Resource Management Plan
<b>RPA –</b>	Reduced Project Alternative
<b>RPL –</b>	Replacement Map
<b>RPO –</b>	Resource Protection Ordinance
<b>RWQCB –</b>	Regional Water Quality Control Board
<b>RZ –</b>	Rezone
<b>SA –</b>	Site Assessment (score)
<b>SAMP –</b>	Special Area Management Plan
<b>SANDAG –</b>	San Diego Association of Governments
<b>SB –</b>	California Senate Bill
<b>SCAQMD –</b>	South Coast Air Quality Management Board
<b>SCH –</b>	State Clearing House
<b>SDAB –</b>	San Diego Air Basin
<b>SDAPCD –</b>	San Diego Air Pollution Control District
<b>sfd –</b>	single family dwelling
<b>SP –</b>	Site Plan
<b>SIP –</b>	State Implementation Plan
<b>SLT –</b>	Screening Level Threshold
<b>SP –</b>	Specific Plan
<b>SR –</b>	State Route
<b>SRA –</b>	San Diego Regional Area
<b>SSM –</b>	Stormwater Management and Discharge Control Ordinance
<b>STP –</b>	Shovel Test Pit
<b>SUSMP –</b>	County of San Diego Urban Stormwater Mitigation Plan for Land Development and Public Improvement Projects
<b>SWMP –</b>	Stormwater Management Plan
<b>TAC –</b>	Toxic Air Contaminants
<b>T-BACT –</b>	Toxic Best Available Control Technology
<b>TeNS –</b>	Caltrans Technical Noise Supplement
<b>TIF –</b>	Transportation Impact Fee
<b>TM –</b>	Tentative Map
<b>toc –</b>	Time of Concentration

<b>TPM –</b>	Tentative Parcel Map
<b>URF –</b>	Unit Risk Factor
<b>USFWS –</b>	United States Fish and Wildlife Service
<b>USGS –</b>	U.S. Geological Survey
<b>V/C –</b>	Volume to Capacity Ratio
<b>VOC –</b>	Volatile Organic Compounds
<b>WA –</b>	Wildlife Agencies (California Department of Fish & Game and U.S. Fish & Wildlife Service)
<b>WPO –</b>	Watershed Protection, Stormwater Discharge and Discharge Control Ordinance
<b>WRP –</b>	Wetland Revegetation Plan
<b>ZOI –</b>	Zone of Influence

## 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 ~~499.9~~194.9 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>	

This page intentionally left blank



United States  
Department of  
Agriculture

Forest  
Service

Cleveland National Forest

Palomar Ranger District  
1634 Black Canyon Road  
Ramona, CA 92065-1205  
(760) 788-0250  
(760) 788-6130 FAX  
CRS 1-800 735-2922

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

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.

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.

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.



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.

5

6

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.

7

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.

8

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.

9

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

10



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.

10

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.

11

12

13

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.

14

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.

15

16

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](mailto: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 risks 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.

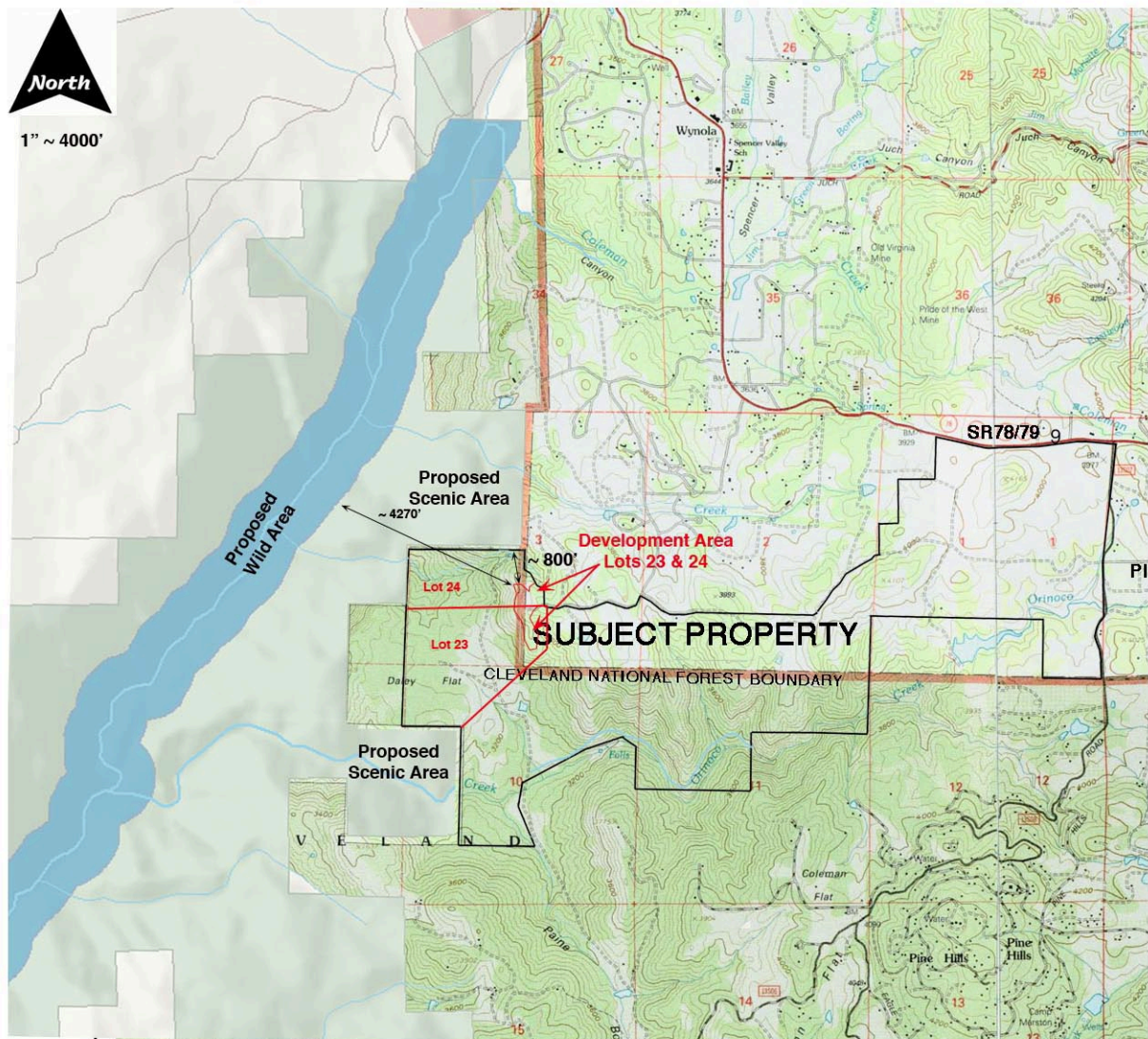
A groundwater assessment entitled *Final Hydrogeologic Investigation*, April 2012 was completed for the Proposed Project and included as Appendix K of the EIR. Groundwater recharge and impacts due to the drought were included in the groundwater analysis. The global climate change analysis also includes 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.

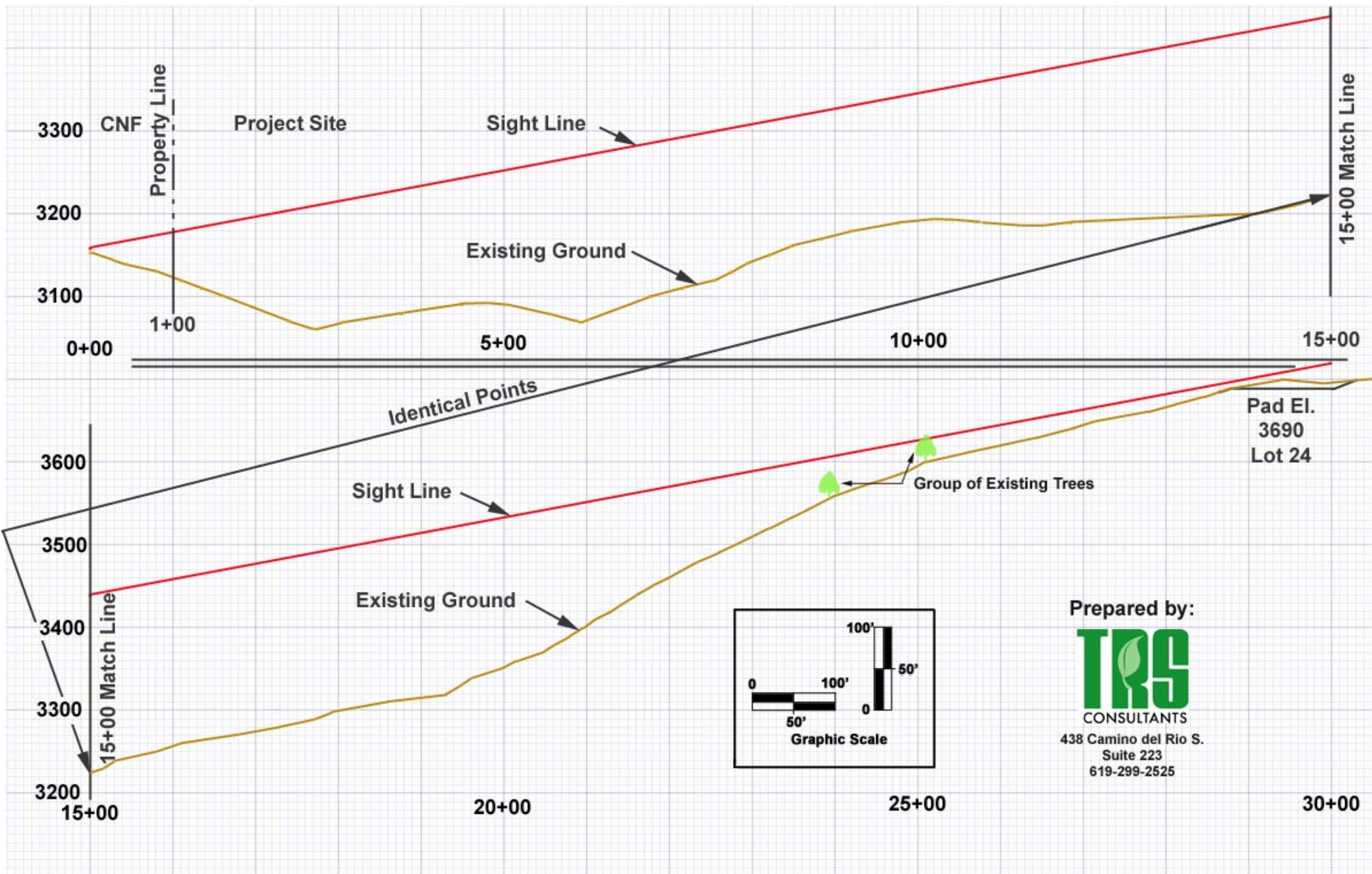
14. The general situation in Ramona cited in the comment involves “subdivisions” of unspecified sizes and density with vineyards. While no specific example is cited, subdivision lot sizes in the vicinity of Ramona area are generally SR-1 to SR-10, or 1 dwelling unit per one to ten acres. The Proposed 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.







Prepared by:  
**TRG**  
CONSULTANTS  
438 Camino del Rio S.  
Suite 223  
619-299-2525





State of California – Natural Resources Agency  
DEPARTMENT OF FISH AND WILDLIFE  
South Coast Region  
3883 Ruffin Road  
San Diego, CA 92123  
(858) 467-4201  
www.wildlife.ca.gov

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*).

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



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

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. 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. 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. 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. 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

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](mailto: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**

DISTRICT 11  
PLANNING DIVISION  
4050 TAYLOR STREET, M.S. 240  
SAN DIEGO, CA 92110  
PHONE (619) 688-6960  
FAX (619) 688-4299  
TTY 711



Planning and  
Development Services



*Flex your power!  
Be energy efficient!*

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:

- 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: 6
  - 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.
  - 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: 8
  - 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. 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', with a stylized flourish at the end.

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:

<b>Existing cattle breeding</b>	<b>Day</b>	<b>Weekly</b>	<b>Monthly</b>	<b>Yearly</b>
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
<b>Totals</b>	<b>1.08</b>	<b>6.69</b>	<b>29.00</b>	<b>396</b>

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 4<sup>th</sup> 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.

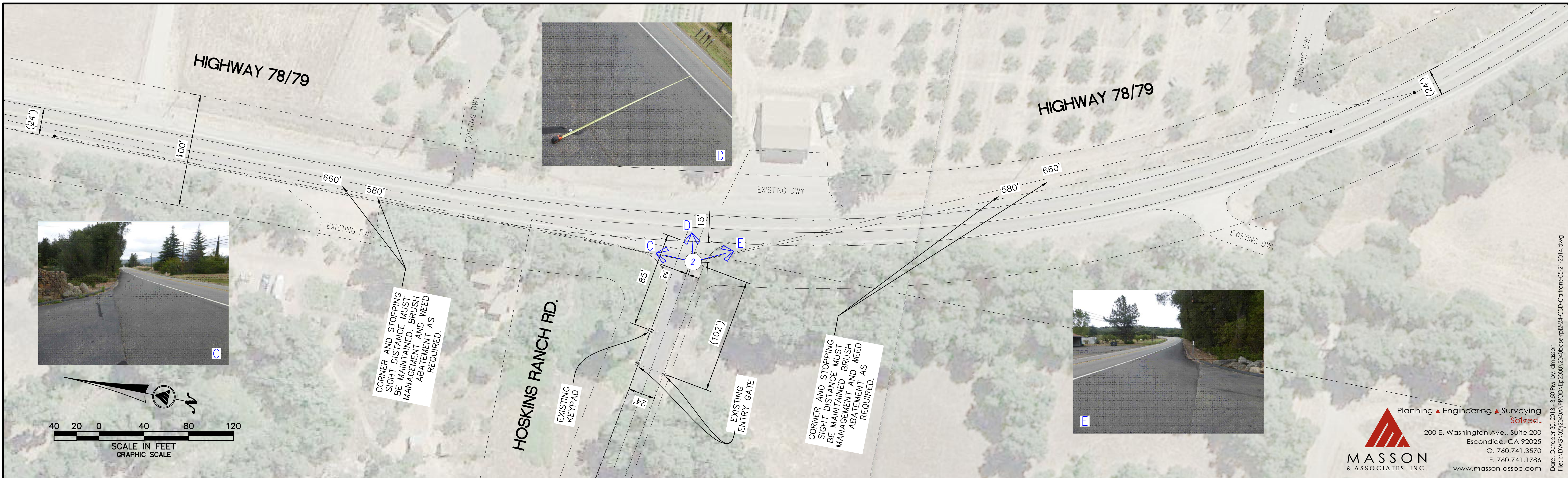
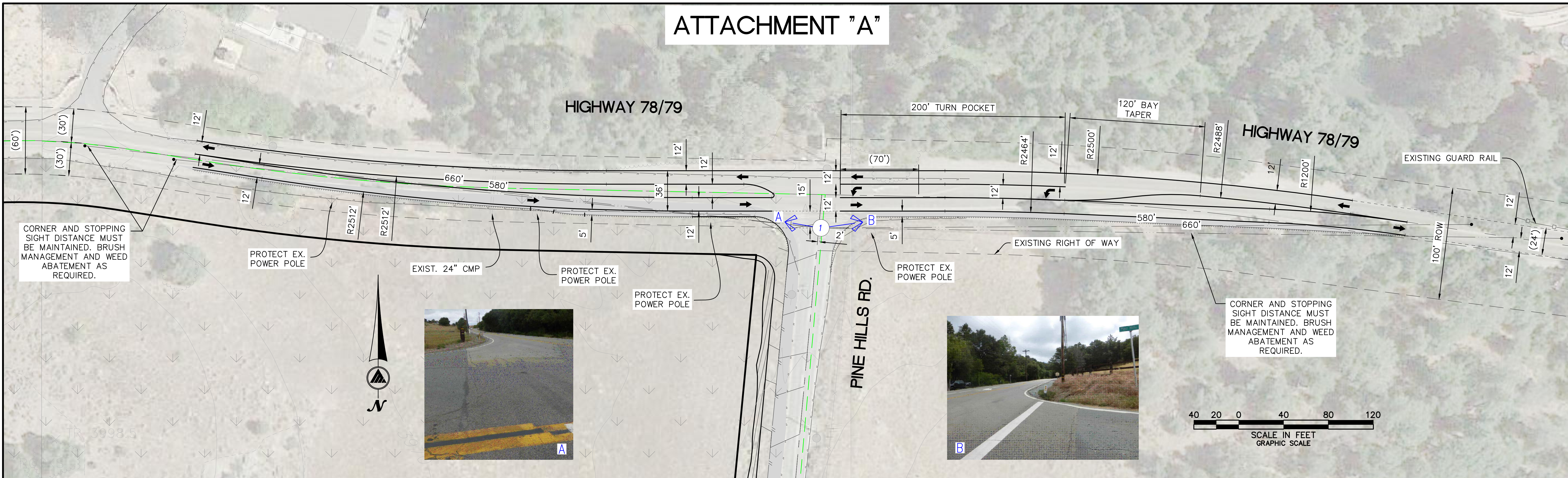
15. The comment is acknowledged. The level of agricultural traffic is discussed in response to point 4 above. The size and type of vehicle would range from half-ton pickups to semi-trucks with livestock trailers suitable for the transport of cattle would be used two to four times a year to bring cattle 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 "A"





# ATTACHMENT B

Table 5-1  
Existing Configuration Sight Distance Summary

Maneuver	Prevailing Speed (MPH) <sup>1</sup>	Existing Sight Distance (feet)				
		Type	Evasive Action	Needed <sup>2</sup>	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

<sup>1</sup>58 MPH rounded up to 60 MPH, 48 and 47 MHP rounded up to 50 MPH

<sup>2</sup>Caltrans 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)

Photo 1: "A" looking to "C"  
Minor Road vehicle looking to Major Road vehicle



Photo 2: "C" looking to "A"  
Major Road vehicle looking to Minor Road vehicle



Photo 1 (zoom): "A" looking to "C"  
Minor Road vehicle looking to Major Road vehicle



Photo 2 (zoom): "C" looking to "A"  
Major Road vehicle looking to Minor Road vehicle



Conceptual Layout of Clear Sight Triangle Existing = 400 feet



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 "B"  
Minor Road vehicle looking to Major Road vehicle



Photo 2: "B" looking to "A"  
Major Road vehicle looking to Minor Road vehicle



Photo 1 (zoom): "A" looking to "B"  
Minor Road vehicle looking to Major Road vehicle



Photo 2 (zoom): "B" looking to "A"  
Major Road vehicle looking to Minor Road vehicle



Conceptual Layout of Clear Sight Triangle Existing = 535 feet



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.

<b>Existing cattle breeding</b>	<b>Day</b>	<b>Weekl y</b>	<b>Monthly</b>	<b>Yearly</b>
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
<b>Totals</b>	<b>1.08</b>	<b>6.69</b>	<b>29.00</b>	<b>396</b>

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

APRIL 2002



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

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] <sup>p</sup>	ESTIMATED WEEKDAY VEHICLE TRIP GENERATION RATE (DRIVEWAY)	HIGHEST PEAK HOUR % (plus IN:OUT ratio) Between 6:00-9:30 A.M. Between 3:00-6:30 P.M.				TRIP LENGTH (Miles) <sup>l</sup>
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)	6%	(5:5)	
General Aviation		6/acre, 2/flight, 6/based aircraft * **	9%	(7:3)	15%	(5:5)	
Heliports		100/acre**					
AUTOMOBILE <sup>s</sup>							
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 <sup>s</sup>							
Super Regional Shopping Center (More than 80 acres, more than 800,000 sq. ft., w/usually 3+ major stores)		35/1000 sq. ft., <sup>c</sup> 400/acre*	4%	(7:3)	10%	(5:5)	
Regional Shopping Center .....	[54:35:11]	50/1000 sq. ft., <sup>c</sup> 500/acre*	4%	(7:3)	9%	(5:5)	5.2
(40-80acres, 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* **	7%	(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%	(5:5)	
			9%	(3:7)	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 <sup>s</sup> .....	[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**

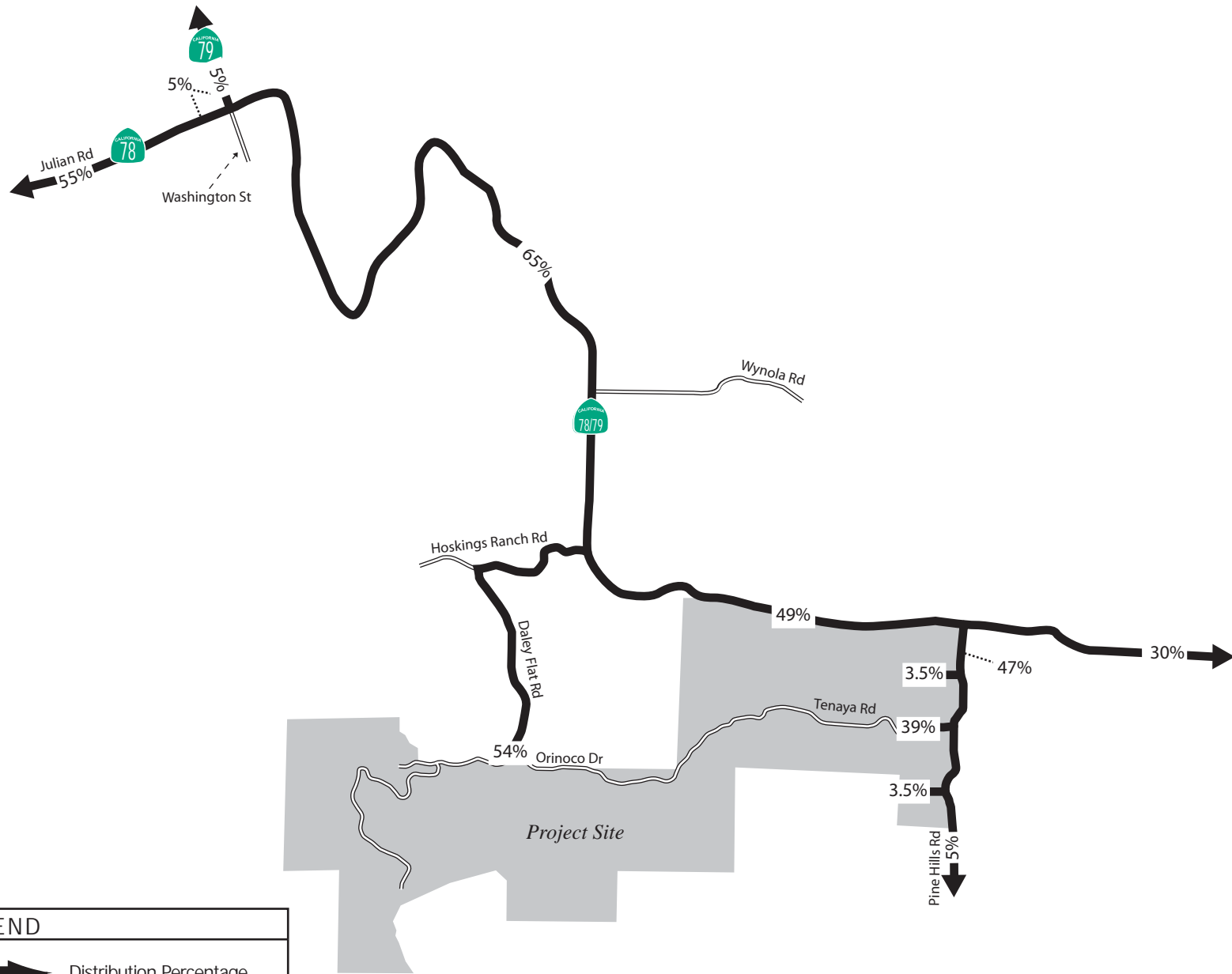
Land Use	Intensity	Units	Rate/Trips	Daily	AM Peak Hour			PM Peak Hour		
					Total	In	Out	Total	In	Out
Estate Residential	24	Dwelling	Rate	12	8%	30%	70%	10%	70%	30%
			Trips	288	23	7	16	29	20	9
Agriculture	495	AC	Rate	2	0%	0%	0%	0%	0%	0%
			Trips	990	0	0	0	0	0	0
Total				1278	23	7	16	29	20	9

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 Trips	12 408	8% 33	30% 10	70% 23	10% 41	70% 29	30% 12
Agriculture	160	AC	Rate Trips	2 320	0% 0	0% 0	0% 0	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

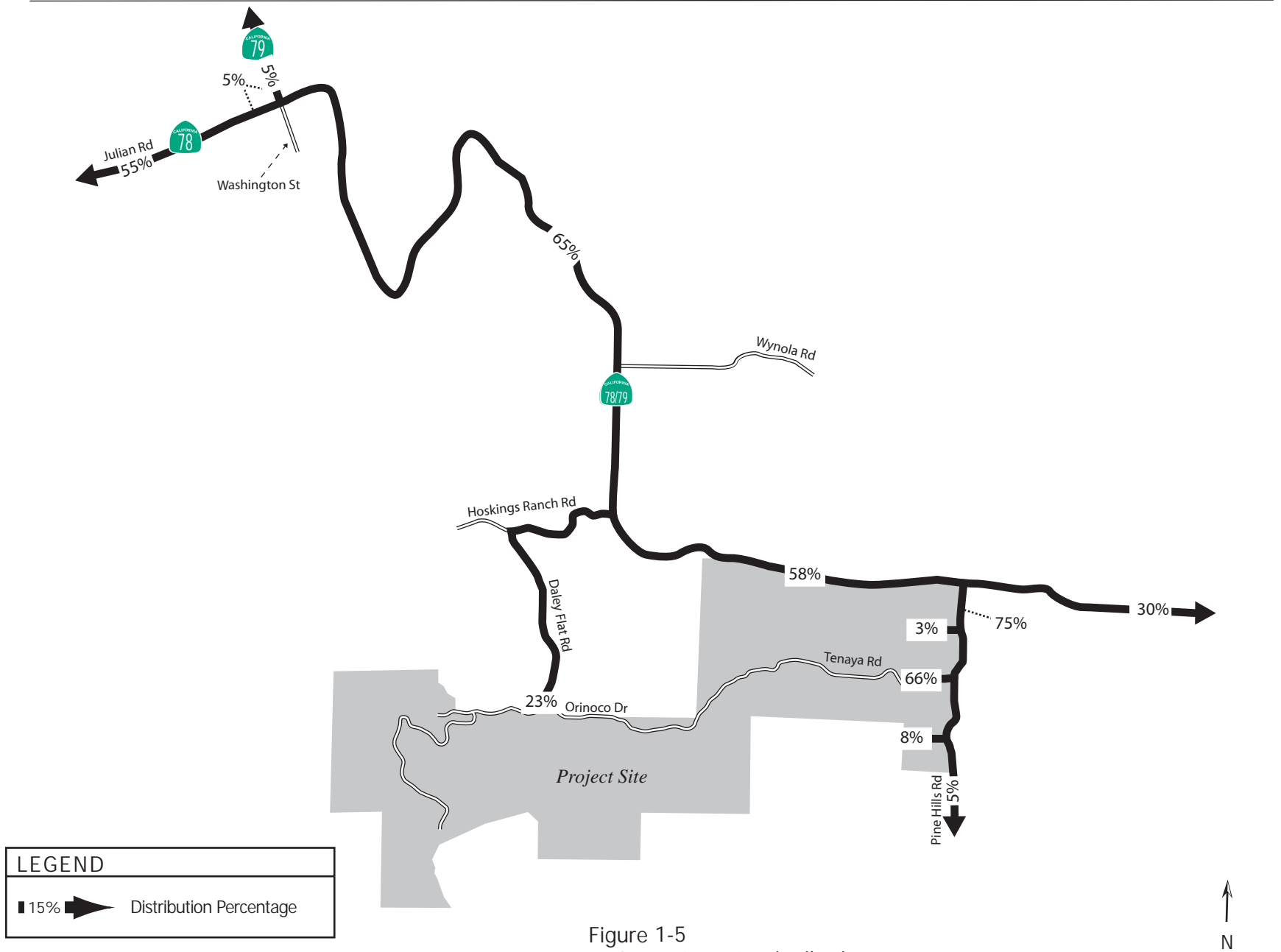


Figure 1-5  
Consolidated Project Alternative Trip Distribution



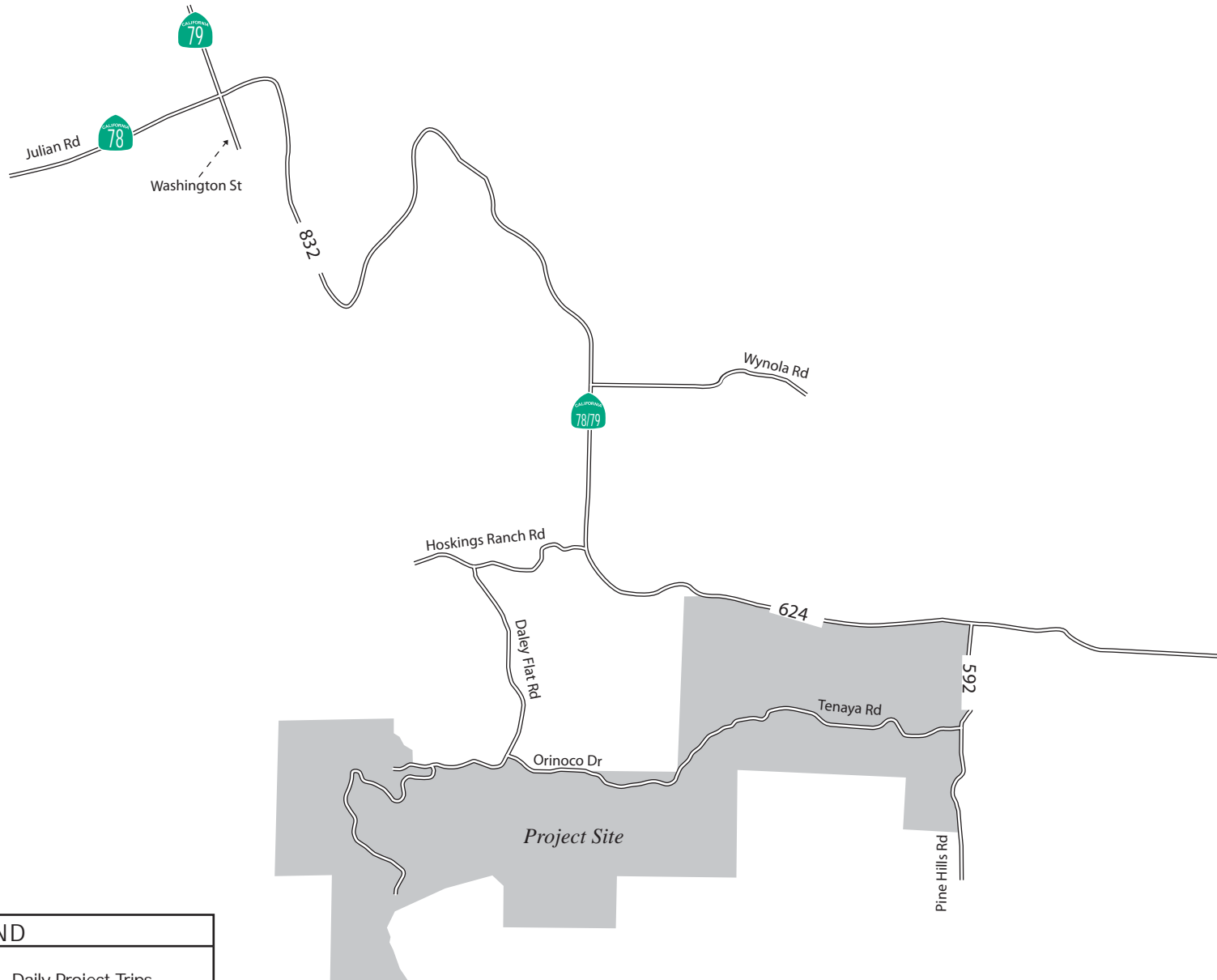
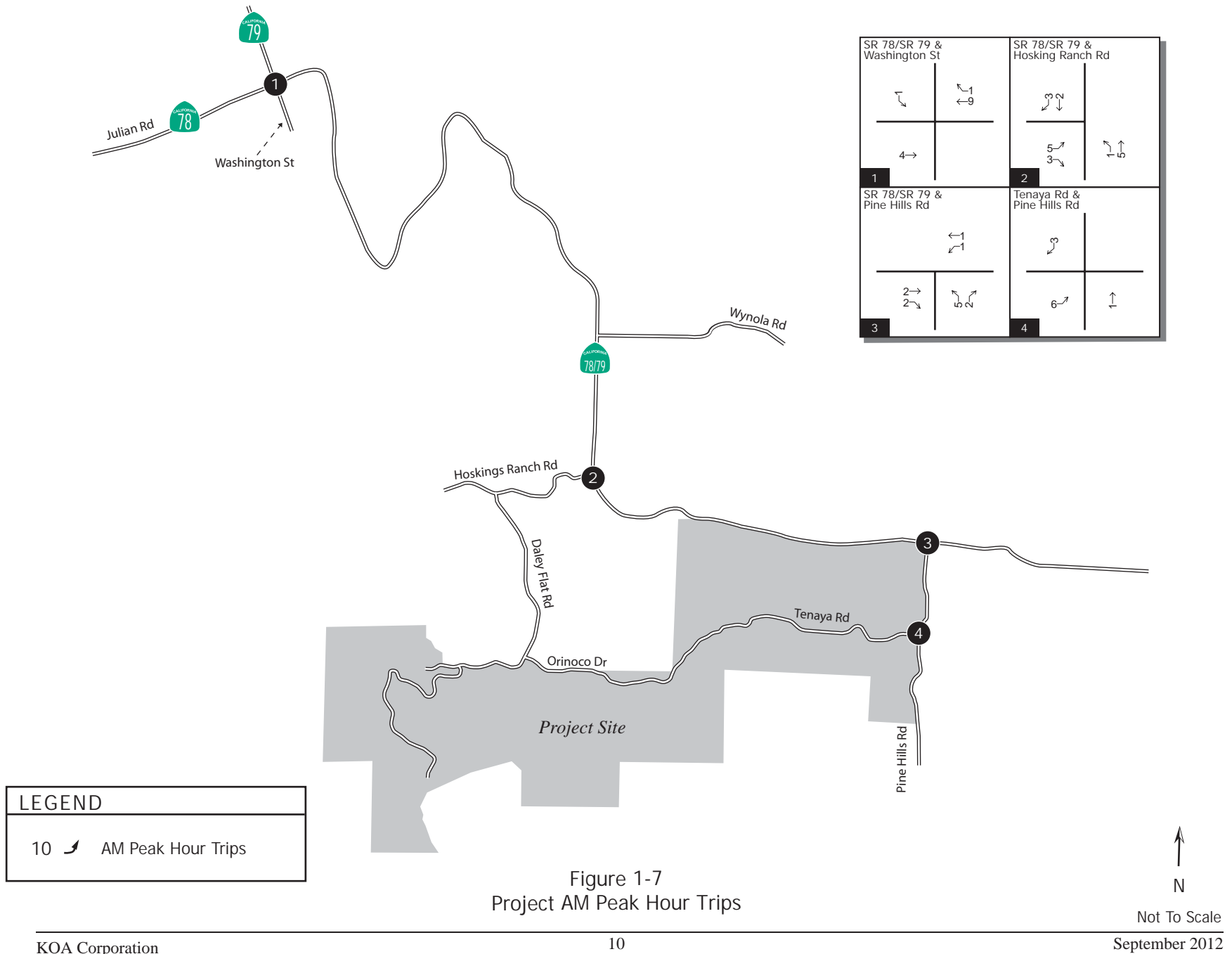


Figure 1-6  
Project Daily Trips Project



Not To Scale



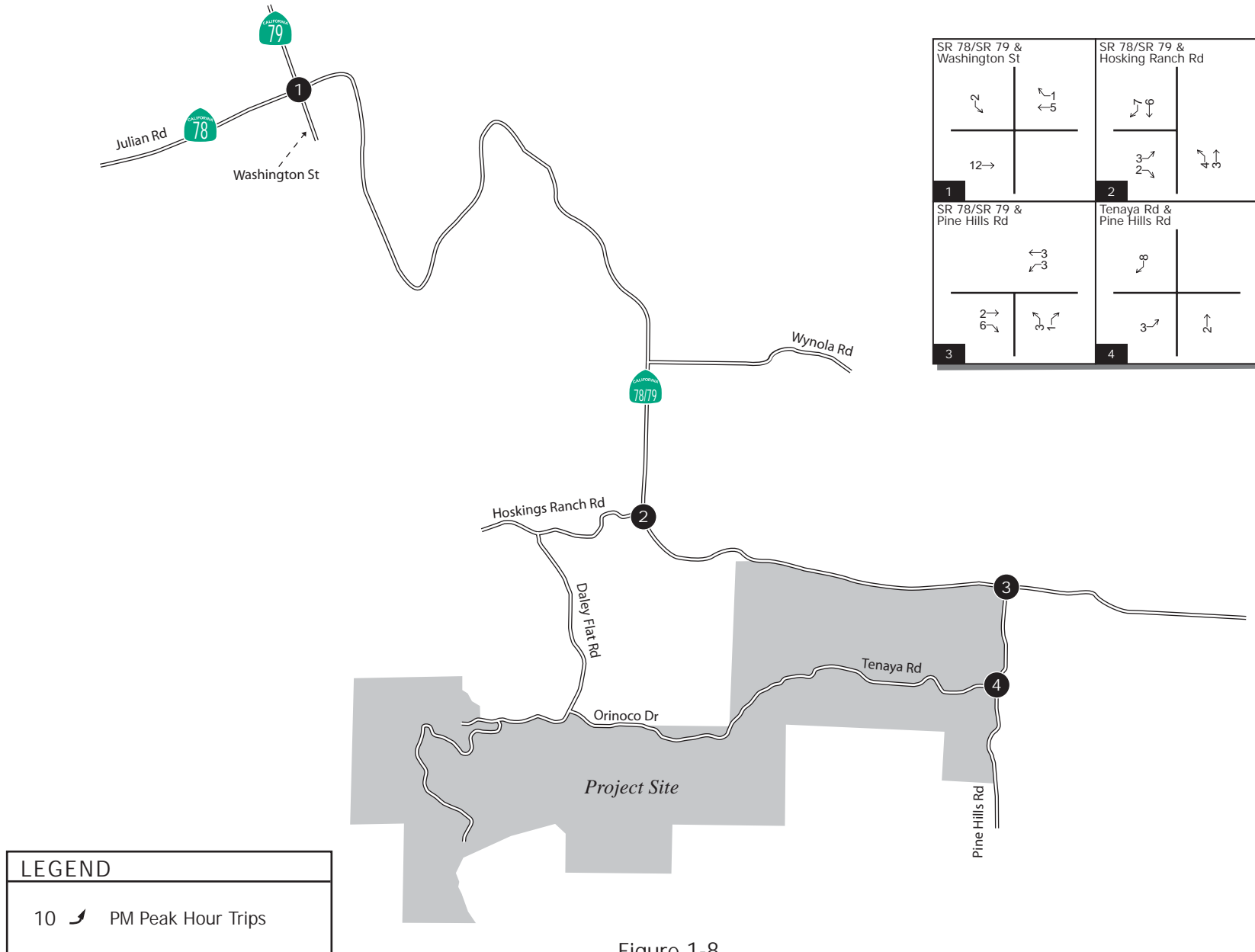


Figure 1-8  
Project PM Peak Hour Trips



Not To Scale

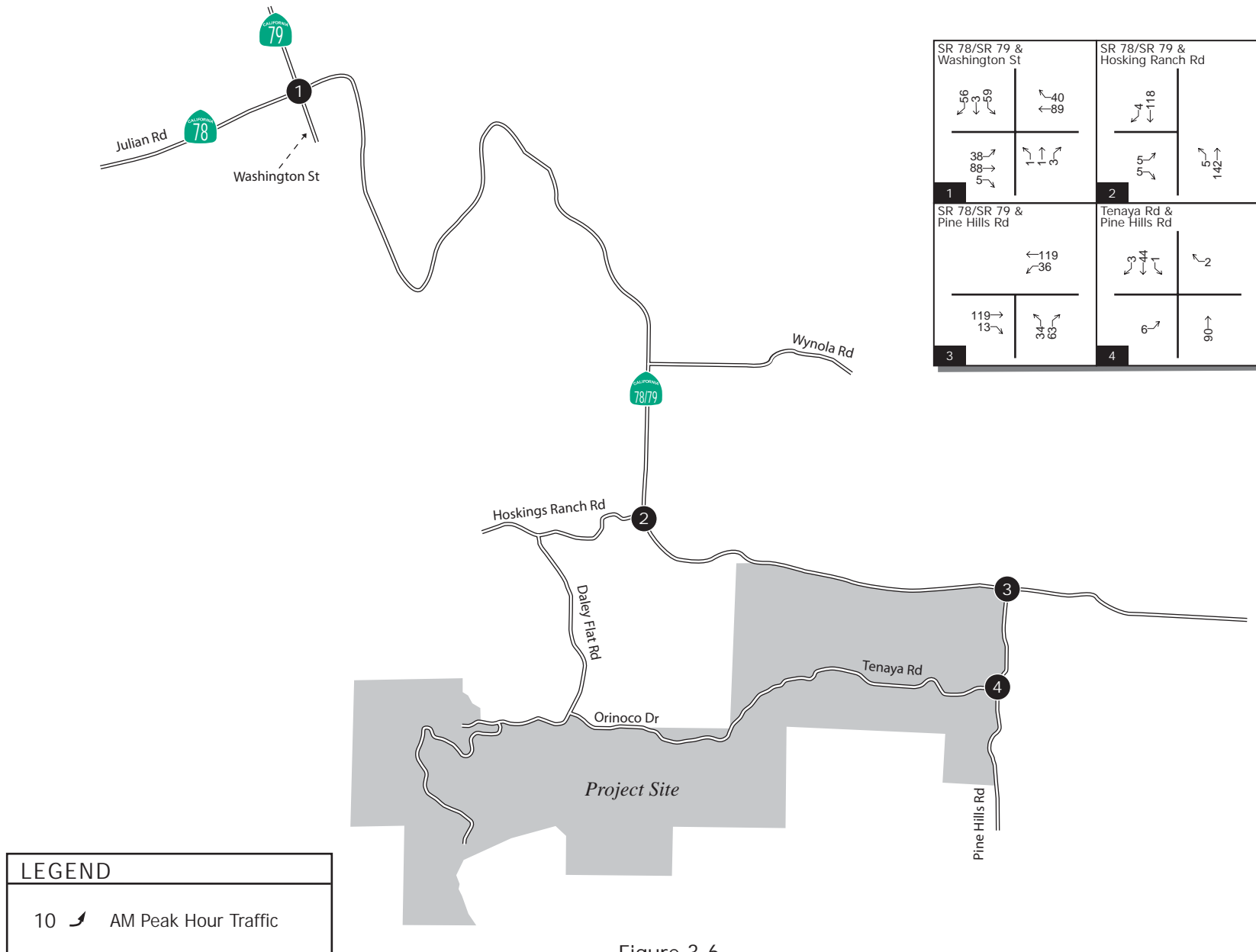


Figure 3-6  
Existing AM Peak Hour Intersection Volumes With Project



Not To Scale

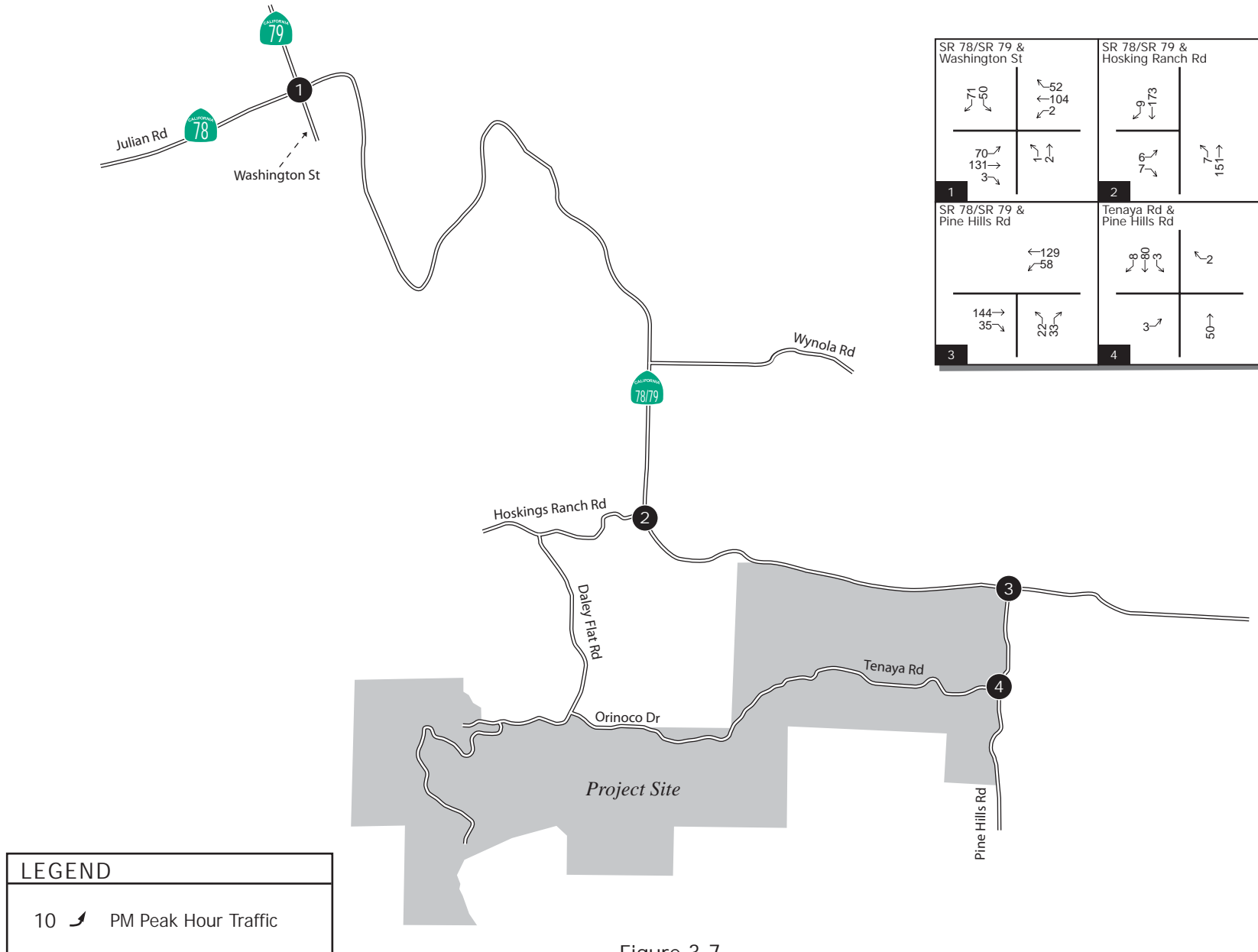
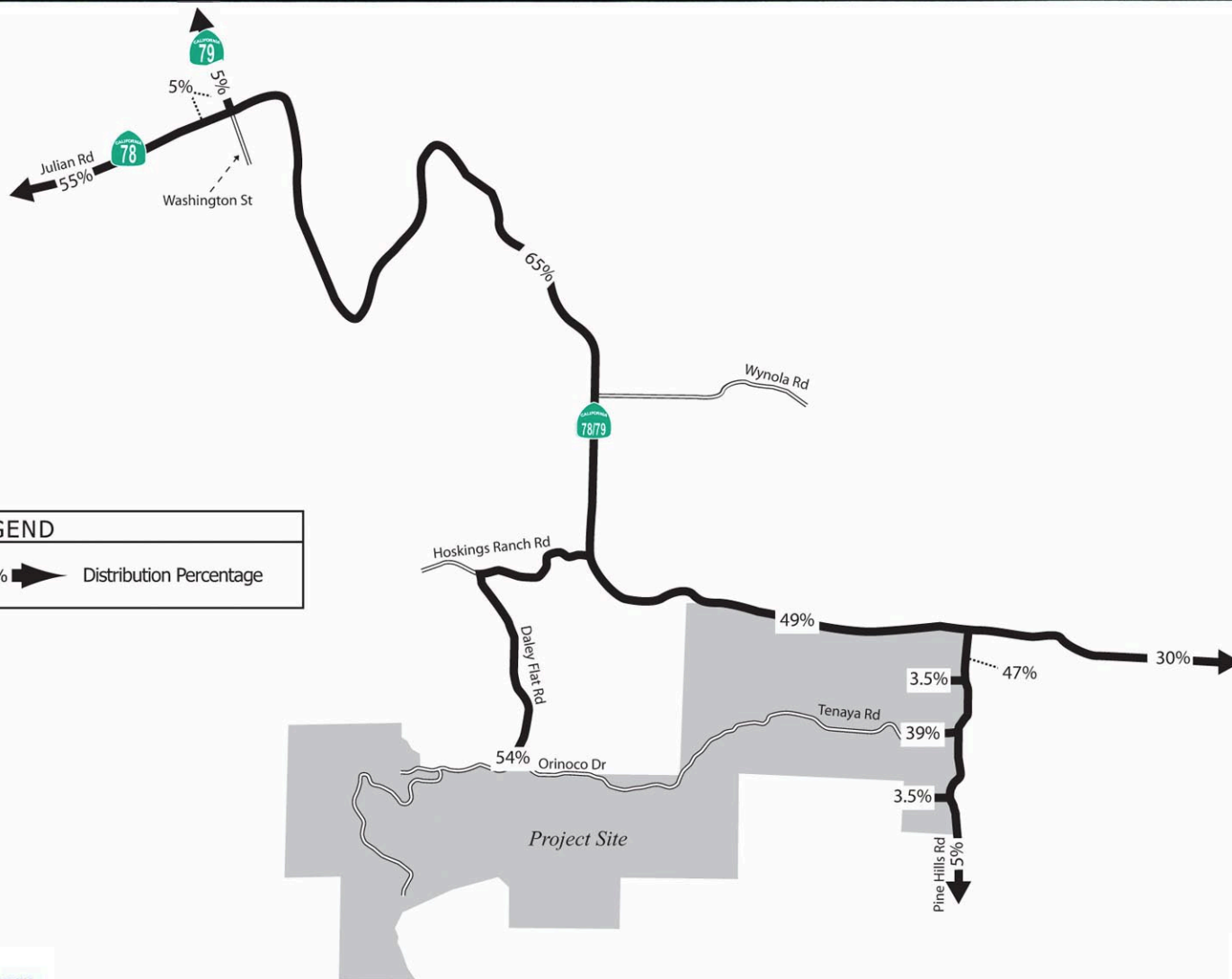


Figure 3-7  
Existing PM Peak Hour Intersection Volumes With Project



Not To Scale

# ATTACHMENT E



**LEGEND**

■ 15% ➔ Distribution Percentage



## Attachment "D"

### Queueing theory calculator

Worst Case - PM Peak Period Hoskings Ranch Rd with Project

<http://www.supositorio.com/rcalc/rcalcite.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>✓</p> <p>42</p> <p>✓</p> <p>8</p> <p>✓</p> <p>24</p> <p>✓</p> <p>25</p> <p>Google + ✓</p> <p>41</p> <p>✓</p>

C (No. of Servers)	K (Queue capacity)	M (Entities population)	$\lambda$ (incoming rate)	$\mu$ (service rate)	1 hrs/day
1	Infinity	Infinity	0.27 units in/Sec	20 units out/Sec	Clear Form

Round to 4 decimal places.						
$\rho$ (Server utilization)	L (Average entities in system)	Lq (Average entities in queue)	W [sec] (Average time spent in system)	Wq [sec] (Average time waiting in line)	$\lambda$	Pn ... n = 2 (Probability of 'n' entities being in the system)
0.0135	0.0137	0.0002	0.0507	0.0007		0.0002

P (time in queue <=	0	secs)=	0.9865
P(time in system <=	0	secs)=	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

September 20, 2013

RECEIVED  
SEP 24 2013  
Planning and  
Development Services

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 3<sup>rd</sup> 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 measures 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 public 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**

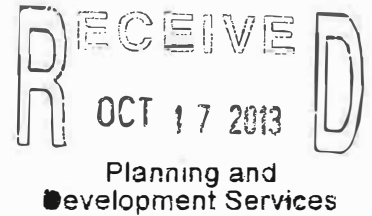
### **Letter D: The California Native American Heritage Commission**

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



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.

1

2

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.



## 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.

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 to 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"



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](mailto: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

G

1

2

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

2

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.

3

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).

4

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.

5

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

6



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.<sup>1</sup> 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.

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.

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.<sup>2</sup> Hypothetical agricultural uses,

<sup>1</sup> 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."

<sup>2</sup> 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

6  
Cont.

7

8

9

10

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

10

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.

11

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.

12

13

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.)

<sup>3</sup> 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.)

14  
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).)

15

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.

16

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*

17



*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.)

17  
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. 4<sup>th</sup> 105, 134.)

18

19

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

20

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.

**20  
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](http://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

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.

5

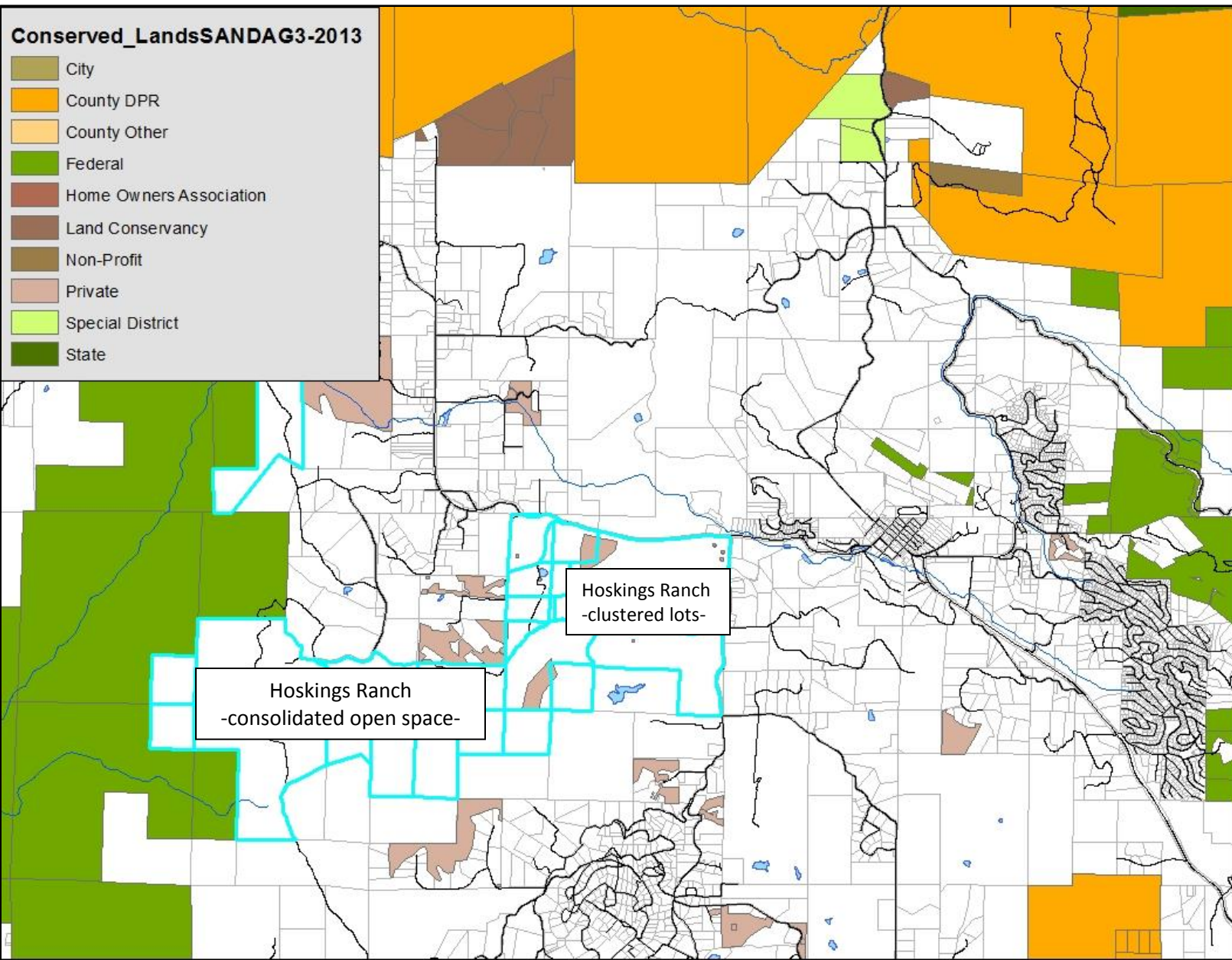
I believe the applicant should analyze a true project alternative that considers more clustering of lots and more consolidation of open space, with respect to existing land use in the region.

6

Sincerely,

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

Jerre Ann Stallcup  
Conservation Ecologist





## **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](mailto:iokuok2@hotmail.com)  
To: [dennis.campbell@sdcounty.ca.gov](mailto:dennis.campbell@sdcounty.ca.gov)  
CC: [wmetz@fs.fed.us](mailto:wmetz@fs.fed.us); [rhutsel@sandiegoriver.org](mailto:rhutsel@sandiegoriver.org); [ifriedlander@fs.fed.us](mailto:ifriedlander@fs.fed.us); [cmbigger@cox.net](mailto:cmbigger@cox.net); [bjlp@borderpowerplants.org](mailto:bjlp@borderpowerplants.org); [donnatisdale@hughes.net](mailto: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.

2

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.

3

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.

4

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.

5

6

7

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

8

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.

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.

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 Engelman 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.

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.

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 Hoskings 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.



North  
No Scale





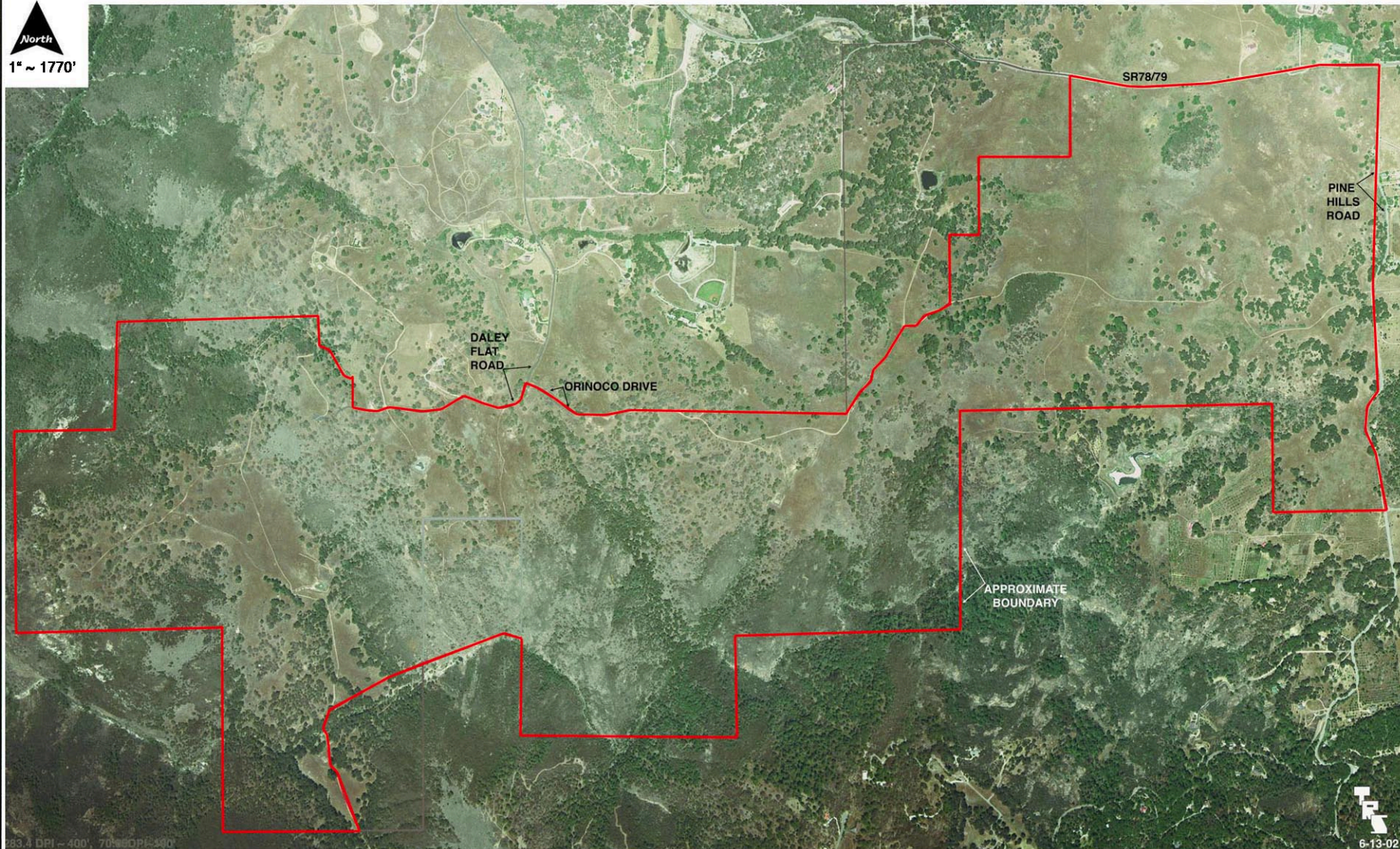


Figure  
S-2

Aerial Photograph

**SIGNIFICANT IMPACTS MITIGATED TO A LEVEL OF LESS THAN SIGNIFICANT**

**Project-Level Impacts**

**2.1 Biological Resources**

<b>Impact No.</b>	<b>Impact</b>	<b>Mitigation</b>	<b>Conclusion and Mitigation Effectiveness</b>
<b>2.1.2.1 Special Status Species</b>			
BI-1	Indirect long-term impacts to Swainson's Hawk, and Cuyamaca Meadowfoam due to habitat loss	<p><b>M-BI-1</b> Management and preservation of 1,209.8 acres of open space protected by a dedicated Biological Open Space or Conservation Easement.</p> <p><b>M-BI-2</b> 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><b>M-BI-5</b> 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**

<b>Impact No.</b>	<b>Impact</b>	<b>Mitigation</b>	<b>Conclusion and Mitigation Effectiveness</b>
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><b>M-BI-1</b> 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><b>M-BI-2</b> 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><b>M-BI-5</b> 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><b>M-BI-1</b> 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><b>M-BI-2</b> 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**

<b>Impact No.</b>	<b>Impact</b>	<b>Mitigation</b>	<b>Conclusion and Mitigation Effectiveness</b>
<b>BI-3 Con't</b>	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.	include fencing and/or signage.  <b>M-BI-5</b> 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.	not significant.
<b>BI-4</b>	Direct and indirect long-term impacts to Golden Eagle habitat due to habitat conversion	<b>M-BI-1</b> 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.  <b>M-BI-2</b> 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.  <b>M-BI-5</b> 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	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.

**SIGNIFICANT IMPACTS MITIGATED TO A LEVEL OF LESS THAN SIGNIFICANT**

**Project-Level Impacts**

**2.1 Biological Resources**

<b>Impact No.</b>	<b>Impact</b>	<b>Mitigation</b>	<b>Conclusion and Mitigation Effectiveness</b>
<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><b>M-BI-1</b> 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><b>M-BI-2</b> 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><b>M-BI-5</b> 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><b>M-BI-1</b> 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><b>M-BI-2</b> 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
BI-6 Con't		<p>signage.</p> <p><b>M-BI-5</b> 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>	impacts are rendered not significant.

**SIGNIFICANT IMPACTS MITIGATED TO A LEVEL OF LESS THAN SIGNIFICANT**

**Project-Level Impacts**

**2.1 Biological Resources**

<b>Impact No.</b>	<b>Impact</b>	<b>Mitigation</b>	<b>Conclusion and Mitigation Effectiveness</b>
BI-7	Indirect short-term impacts to nesting success of special status species due to grading or other noise-generating activities	<p><b>M-BI-1</b> 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><b>M-BI-2</b> The RMP will place restrictions on grading and other activities for the protection of nesting animals.</p> <p><b>M-BI-3</b> 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><b>M-BI-1</b> 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
------	---	---	---



**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**

<b>Impact No.</b>	<b>Impact</b>	<b>Mitigation</b>	<b>Conclusion and Mitigation Effectiveness</b>
BI-8 Con't		<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><b>M-BI-2</b> The RMP will provide enforceable protective measures for the resources within the open space.</p> <p><b>M-BI-5</b> 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><b>M-BI-8</b> 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>	
BI-9	Project-related future construction, grading, clearing, or other activities will result in	<b>M-BI-1</b> 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	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

**SIGNIFICANT IMPACTS MITIGATED TO A LEVEL OF LESS THAN SIGNIFICANT**

**Project-Level Impacts**

**2.1 Biological Resources**

<b>Impact No.</b>	<b>Impact</b>	<b>Mitigation</b>	<b>Conclusion and Mitigation Effectiveness</b>
<b>BI-9</b> <u>Con't</u>	<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 <b>BI-9</b>, above.</p> <p><b>M-BI-2</b> The RMP will provide enforceable protective measures for the resources within the open space.</p> <p><b>M-BI-5</b> 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><b>M-BI-8</b> 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**

<b>Impact No.</b>	<b>Impact</b>	<b>Mitigation</b>	<b>Conclusion and Mitigation Effectiveness</b>
<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><b>M-BI-1</b> 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><b>M-BI-2</b> The RMP will control human and animal encroachment. Restrictions may include fencing and/or signage.</p> <p><b>M-BI-5</b> 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.
<b>2.1.2.3 Jurisdictional Wetlands and Jurisdictional Wetland and Waterways</b>			
BI-11	Project-related future construction, grading, clearing, or other activities will result in direct long-term (permanent) impacts to	<p><b>M-BI-12</b> Management and preservation of 1,209.8 acres of open space protected by a dedicated Biological Open Space or Conservation Easement.</p> <p><b>M-BI-2</b> 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**

<b>Impact No.</b>	<b>Impact</b>	<b>Mitigation</b>	<b>Conclusion and Mitigation Effectiveness</b>
<u>BI-11</u> <u>Con't</u>	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>signage.</p> <p><b>M-BI-4</b> 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><b>M-BI-6</b> 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>	
<b>2.1.2.5 Local Policies, Ordinances, Adopted Plans</b>			
BI-12	Direct long-term (permanent) impacts to a measurable amount of RPO-sensitive habitat	<b>M-BI-1</b> 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	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



**SIGNIFICANT IMPACTS MITIGATED TO A LEVEL OF LESS THAN SIGNIFICANT**

**Project-Level Impacts**

**2.1 Biological Resources**

<b>Impact No.</b>	<b>Impact</b>	<b>Mitigation</b>	<b>Conclusion and Mitigation Effectiveness</b>
<u>BI-12</u> <u>Con't</u>	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. Of these habitats, hydrophytic areas of ef	<p>onsite.</p> <p><b>M-BI-2</b> An RMP will control human and animal encroachment. Restrictions may include fencing and/or signage.</p> <p><b>M-BI-5</b> 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><b>M-BI-8</b> 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>	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.

## 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-12 <u>Don't</u>	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		

**SIGNIFICANT IMPACTS MITIGATED TO A LEVEL OF LESS THAN SIGNIFICANT**

**Project-Level Impacts**

**2.1 Biological Resources**

<b>Impact No.</b>	<b>Impact</b>	<b>Mitigation</b>	<b>Conclusion and Mitigation Effectiveness</b>
<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><b>M-BI-1</b> 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><b>M-BI-2</b> An RMP will control human and animal encroachment. Restrictions may include fencing and/or signage.</p> <p><b>M-BI-3</b> 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**

<b>Impact No.</b>	<b>Impact</b>	<b>Mitigation</b>	<b>Conclusion and Mitigation Effectiveness</b>
<u>BI-13</u> <u>Con't</u>		preconstruction nesting survey of all areas within 500 feet <u>Sin</u> 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><b>M-BI-1</b> 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><b>M-BI-2</b> An RMP will control human and animal encroachment. Restrictions may include fencing and/or signage.</p> <p><b>M-BI-3</b> The RMP will place seasonal restrictions on grading and other activities for the protection of nesting animals, as described in BI-15.</p> <p><b>M-BI-5</b> 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**

<b>Impact No.</b>	<b>Impact</b>	<b>Mitigation</b>	<b>Conclusion and Mitigation Effectiveness</b>
<b>Project-Level Impacts</b>			
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><b>M-CR-1</b> 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><b>M-CR-1</b> 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 <del>historical</del> <u>archaeological</u> resources as defined in Section 15064.5 of the State CEQA Guidelines.	<b>M-CR-1</b> 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.  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.
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.	<b>M-CR-2</b> 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	<b>M-CR-1</b> 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
<del>CR-5</del> <del>Con't</del>	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.	<b>M-CR-1</b> 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
Cumulative Level Impacts			
TR-1	In the cumulative condition, the project contributes vehicle trips to roadways that operate at inadequate levels of service.	<b>M-TR-2</b> 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.



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

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

## CHAPTER 1.0 PROJECT DESCRIPTION AND ENVIRONMENTAL SETTING

### 1.1 Project Objectives

The Proposed 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 grass lands.
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).~~

### 1.2 Project Description

#### 1.2.1 Project's Component Parts

The Hoskings Ranch Tentative Map (Proposed Project) encompasses 1,416.5 acres, of which ~~206.9~~201.9 acres would be developed with residential pads and roads. Approximately ~~1,209.8~~1,214.8 acres would be preserved as open space. ~~A 5.0-acre lot would be provided to the 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. Approximately an additional~~ 14.7 acres are within existing road right of way along Pine Hills Road and SR 78/79.

The Proposed Project would subdivide the Project Site into 24 lots as shown on Figure 1-1, "Project Tentative Map." A California Land Conservation Act (Williamson Act) contract encompasses 1,291.9 acres of the Project Site.<sup>1</sup> The contract was amended on March 24, 1982 to reduce the minimum lot size from 160 to 40 acres. The Proposed Project is consistent with this requirement because it proposes minimum lot sizes of 40 acres.

One modification to the contract is proposed as part of the Proposed Project. Approximately 161.23 acres currently under contract in the southeast part of the site (including all or part of Assessor Parcel Maps 249-06-04 and 249-06-06) were not covered by the March 24, 1982 amendment that reduced minimum lot sizes from 160 to 40 acres. The applicant proposes to include this area in an amendment that would allow 40-acre lots. The amendment would be considered at a hearing of the Board of Supervisors and made a condition of the Final Map for the Proposed Project. The amendment request would be processed by the Legal Property Division of the County

<sup>1</sup> Agricultural Preserve No. 24 executed February 19, 1974.

Department of General Services, in accordance with Board of Supervisors Policy I-38. Upon approval it would be recorded with the County Recorder.

In addition to minimum lot requirements, the Williamson Act contract requires that residential uses, should they occur, be incidental to agricultural uses of the land. Two perspectives are provided as to the incidental nature of agriculture on the site.

Interpretation 1

The Proposed Project as designed does not provide large enough areas for agriculture on all lots to justify defining the residential use as “incidental.”

Interpretation 2

The Proposed Project has been designed to accommodate existing grazing/cattle breeding while providing a residential component on each lot.

Agriculture would continue after subdivision in compliance with the Williamson Act contract. Any new lot owners would be informed about the existing grazing/cattle breeding lease and the Williamson Act contract and future property owners would be encouraged to continue using the property for agriculture. A Conceptual Grazing Management Plan (CGMP) has been prepared that provides management of habitats related to grazing. All grazing activities would be subject to monitoring and reporting as well as remedial action, as needed, and would be coordinated with the Resource Management Plan (RMP). A continuation of existing grazing leases is envisioned under a joint grazing/cattle breeding agreement that would be put into place before lot sales take place. The agreement would allow cattle grazing/breeding to continue under professional management.

Should individual owners opt out of the joint lease, they would be required to establish agriculture on their site. If they wish to discontinue agriculture they would have to go through the contract termination process. The most common method of termination is a notice of non-renewal, a process which takes ten years. To expedite the process, property owners may pay a fee equal to 12.5 percent of the assessed value of their property to terminate the contract.

The Proposed Project has minimal off-site impacts. To maintain sight distance along Pine Hills Road at the project entrance, and along SR 78/79 at the Pine Hills Road intersection, some trees would be trimmed. It is anticipated no trees would have to be removed to achieve adequate sight distance. Off-site impacts are depicted in Figure 1-2, “Offsite Impacts.”

Open space of ~~1,209.81~~1,214.8 acres is proposed and would be located throughout the site to protect sensitive resources. Open space for biological purposes has been designed to provide protection for the site’s most sensitive habitats and preserves important habitat linkages. Signage and/or fencing would be provided where necessary in accordance with an approved signage/fencing plan. A concept plan is provided in Figure 2-1-5, “Open Space, Fencing and Signage Plan.” The open space would be managed and maintained by a Habitat Manager as provided in the RMP for the property, included in Appendix A of the biology report for the Proposed Project.

Grazing would also be allowed throughout the site. The grazing density would be kept low so the land is not overgrazed, per the provisions described in the CGMP, included in the agricultural report for the Proposed Project. Grazing would be governed by contract. The CGMP would regulate the number of cattle on the site, fencing requirements, and otherwise provide for good stewardship of the land. The Habitat Manager and grazing

operators would coordinate their activities. Cooperation would be a feature of both the RMP and the CGMP contracts.

The project site includes extensive environmental resource overlays and open space easements. Most of the existing overlays and easements occur in areas proposed for open space, with two exceptions. These areas are not available to be claimed as open space credits and are instead considered "impact neutral".

The Proposed Project would modify two easements to allow for access to selected lots and to improve the open space preserve design. The total area of modification is 5.3 acres. The specific areas of modification are indicated on the tentative map. Details of the proposed modifications are discussed below. Details of the areas of open space vacation are shown on Figure 1-3, "Close-up of Proposed Open Space Vacations on Primary Project Design." Impacts to the sensitive habitat areas within the biological easement must be mitigated at twice the accepted mitigation ratio.

Easement locations are included on the Tentative Map:

- Lots 12, 13 and 14 (APN 289-062-07): Vacate or otherwise modify an easement granted in favor of George and Janet Smith for road, utility, and incidental purposes. A 1.82-acre area of the easement would be vacated to allow for the main access road that traverses the easement. Portions of the easement not developed would be incorporated into the adjacent open space easement.
- Lots 18, 21, 22, 23 and 24 (APNs 289-470-38 and 289-030-12): Vacate or otherwise modify a portion of an easement granted for open space and incidental purposes and recorded March 27, 1986 as instrument 86-118542 of official records. A 3.5-acre area would be vacated to allow for access roads to these lots. A larger open space easement is proposed in the area that would encompass the remainder of the easement and additional areas deemed in need of protection.

~~A 5.0-acre lot would be dedicated to the Julian/Cuyamaca Fire Protection District (JCFPD) as a public service. The site is located along SR 78/79 approximately 1,400 feet west of Pine Hills Road. The site would be given to the District as a condition of the Final Map. No action to design or permit the facility is being undertaken as part of the Proposed Project. However, a single 20 x 40 foot garage is contemplated for the site. A well would be required to provide water. A septic system has been designed although permanent, full-time staffing of the site is not anticipated.~~

Law enforcement services would be provided by the San Diego County Sheriff's Office. School service would be available from the Julian Union School District and the Julian Union High School District. Students would attend Julian Elementary, Julian Junior High School and Julian High School. The schools are within two to four miles of the proposed site.

The Proposed Project Site is outside the County Water Authority line, and the site is not within the boundary of a water or sewer district. Therefore these services would be provided by wells and septic systems installed by each lot owner. Extensive water-well testing has verified that well water is available on the property, as detailed in Appendix K. Septic system designs and percolation tests have been reviewed and approved by the County Department of Environmental Health (DEH). A tentative map has been prepared for the Proposed Project. As required by the County of San Diego, residential pads are shown, although no pads are proposed at this time. Figure 1-1, "Project Tentative Map," shows the overall project configuration while the grading plan provides



details. The proposed on-site roadway would be graded as part of the project. Total grading of 103,127 cubic yards (CY) of balanced cut and fill would be required. Manufactured slopes are a maximum of 30 feet in height along the roadway. Slopes do not exceed a maximum fill slope ratio of 1.5:1, or a maximum cut slope ratio of 1:1. All manufactured slopes above three feet in height would be landscaped with fire-safe plants in conformance with County ordinances. One drainage crossing would be necessary to provide access to lots and accommodate a 100-year flood event. The biological impacts of this crossing are detailed in the biological report for the Proposed Project and the biological summary in the EIR.

Access to the Proposed Project is provided from Pine Hills Road via SR 78/79, as shown on Figure 1-1. A second access would be provided via Daley Flat Road north to Hoskings Ranch Road and east to SR 78/79. The road would meet current fire code requirements as related to width and weight-bearing capacity. On-site roads are planned as private two lane roads. These consist of Tenaya Road, Orinoco Drive, Daley Flat Road, Bear Run Lane, Deer Run Lane and Ute Peak Lane. Details of the local circulation system are shown in Figure 2-3-1, "Existing Circulation Network."

Access to some lots would be provided by streets which branch off the main roads, as described below; these would be improved to a paved width of 24 feet on a 28-foot graded width, within a 40-foot easement.

Pine Hills Road, along the Proposed Project's eastern boundary, would serve lots 5 and 8. This existing roadway is a public road classified as a Rural Collector.

Tenaya Road would provide the main project entry and would begin at Pine Hills Road on the property's eastern boundary, and would proceed in a westerly direction to Orinoco Drive, an existing private east/west roadway. Tenaya Road would be paved to a width of 24 feet on a 28 foot graded width within a 40-foot easement. It would generally follow an existing dirt road and would serve lots 7, 9, 10, and 11.

Orinoco Drive extension would provide a continuation of Tenaya Road from the Orinoco/Tenaya intersection west to Daley Flat Road, an existing private roadway. Orinoco Road would be improved to a paved width of 24 feet on a 28 foot graded width within a 40-foot easement. The road would generally follow an existing dirt road and would serve lots 12, 13, and 14.

Daley Flat Road is an existing paved private road that would provide service from the Daley Flat/Orinoco intersection west, serving lots 22 through 24. Daley Flat Road connects to Hoskings Ranch Road to the north, which in turn connects to SR 78/79. Daley Flat Road to Hoskings Ranch Road provides the secondary access to the Proposed Project (see Figure 1-4, "Secondary Access"). The Proposed Project has rights to the use of this route. Ute Peak Lane would serve lots 1 through 4 and Lot 6, trending north from Tenaya Road. Bear Run Lane would serve lots 18 through 21 trending south from Daley Flat Road. Deer Run Lane would serve lots 15 through 17, trending south from Orinoco Drive.

Sight distances for County or State roads affected by the Proposed Project have been evaluated using approved County of San Diego methodology. This encompasses evaluations performed at the:

- existing Pine Hills Road/SR 78/79 intersection;
- existing Hoskings Ranch Road/SR-78/79 intersection;

- proposed Tenaya Road/Pine Hills Road intersection; [and](#)
- ~~proposed fire station driveway/SR 78/79 intersection, and;~~
- the proposed driveways for lots 5 and 8 at Pine Hills Road.

Sight distance is met for all roadways with minor trimming of vegetation at specific locations. This consists of trimming trees in the following locations:

- the south side of the SR 78/79 immediately east of the Pine Hills intersection;

A biological assessment of these sites was conducted. The trees affected would experience minor trimming and would not be otherwise disturbed. This action is reviewed in detail in the biological section of the [DEIR/FEIR](#) (Section 2.1.2).

## 1.2.2 [DEIR/FEIR](#) Technical, Economic, Environmental Characteristics

### 1.2.2.1 *Technical Characteristics*

The Proposed Project is designed to be compatible with surrounding land uses, sensitive biological and cultural resources, and the continuation of agriculture. Figure 1-5, "USGS Quadrangle Map," shows the land uses in the vicinity. The Proposed Project includes uses such as residential and agricultural, which are consistent with the category, designations, and zoning of the Historic General Plan (HGP). On August 3, 2011, the Board of Supervisors adopted a new General Plan. However, the Board's Pipeline Policy permits subdivision projects whose applications were deemed complete on or before August 6, 2003 to have pipelined status. The Proposed Project meets this requirement and therefore the [DEIR/FEIR](#) evaluates the Proposed Project under the provisions of the HGP.

There are one regional category and one designation on the site. Hoskings Ranch is in the Environmentally Constrained Areas (ECA) regional category in the Land Use Element of the HGP because the site is within an agricultural preserve and part of the site is within the Cleveland National Forest (CNF). Approximately 680 acres fall into this category.

The Proposed Project is designated (19) Intensive Agricultural in the GP, which allows parcel sizes of 2, 4, or 8 acres. Parcel sizes are larger than the minimum requirement.

The site is zoned A72 (8), which allows one dwelling unit per eight acres. The zone is intended to allow for the compatibility of residential and agricultural land uses. The Proposed Project maintains this compatibility by proposing agricultural lots that can accommodate residential uses and by proposing lot that exceed the minimum lot size.

### 1.2.2.2 *Economic Characteristics*

Hoskings Ranch is currently under contract to allow grazing/cattle breeding. The site has been used for this purpose in the past. The Proposed Project would provide economic value by preserving the potential for agriculture on each of its 24 lots. The agricultural acreage averages 17.7 acres per lot. This compares favorably with farm

sizes in San Diego County, where the median farm size is five acres, and 63 percent of farms fall within the 1- to 9-acre range.<sup>2</sup>

### 1.2.2.3 *Environmental Characteristics*

The Proposed Project has been designed to avoid sensitive resources. Chapter 7.0, "List of Mitigation Measures and Environmental Design Considerations," lists the proposed design measures.

Habitat on the site is characterized by chaparral, scrub, oak woodlands, herbaceous uplands, wetlands, and unvegetated habitats. The Proposed Project has been designed to preserve as much of the sensitive habitat as possible through the creation of open space encompassing a total of ~~4,209.81~~ 1,214.8 acres, as shown on Figure 1-1. Protective fencing and/or signage would be installed as necessary to prevent encroachment into protected areas. The open space would be managed by an approved Habitat Manager in accordance with the RMP. More details are provided in Section 2.1, Biology.

Approximately 680 acres on the Project Site fell within the FCI. The initiative sunsetted at the end of 2010 and no longer applies.

The Resource Protection Ordinance (RPO) provides for the protection of sensitive resources in the County of San Diego. Specific provisions protect steep slopes, sensitive habitats, wetland, floodplains, unique topographic features, and cultural resources. Steep slopes occur on the site, but potential graded areas generally avoid all steep slopes. The four exceptions are within the encroachment allowances of the RPO.

The RPO generally defines sensitive habitat lands as those that include unique vegetation communities and habitat that is necessary to support sensitive species. The Proposed Project has avoided these areas whenever possible by locating potential pads and agricultural areas away from sensitive habitats and by creating a large area of protected open space.

RPO wetlands are present in several locations throughout the site. Impacts to RPO wetlands have been avoided or minimized as part of the Proposed Project's design, and wetland buffers of a minimum of 50 feet up to 200 feet have been incorporated into the design. In one case where the main entrance is proposed, an RPO crossing is necessary which impacts the wetlands in that location. Four RPO buffers would also be impacted: in lots 6, 7, and 9 due to the Project's main access, in lot 6 due to the driveway for that lot. These are shown in Figure 2-1-6, "Proposed Project – RPO Encroachments."

The cultural resources study noted the presence of 45 cultural resource sites on the site, 38 of which are considered RPO-significant. All of these have been avoided in designing the Proposed Project. In addition, formation of a Rural Landscape District has been recommended to recognize and protect onsite historical resources. Open space protections and monitoring have been provided, which includes buffers. More details are provided in Chapter 2.2, Cultural Resources.

---

<sup>2</sup> Department of Agriculture Weights and Measures, *2007 Crop Statistics and Annual Report*, page 3

In summary, the Proposed Project complies with the RPO through a series of design features that avoid impacts to protected resources. These consist of avoidance, open space protection, and ongoing management of protected resource lands.

The potential for controlled or polluted runoff has been addressed through design measures in the drainage study, hydromodification study, and the Stormwater Management Plan (SWMP). The SWMP specifies a range of Best Management Practices (BMPs) that would be used in the design of Project drainage. Examples of these are grassy bio retention techniques that would act as natural filtering features for pollutants. Chapter 3.1.7 provides more details about these measures. A Construction Management Plan would be used to minimize construction dust and vehicle emissions.

The site is bounded on the north by SR 78/79. SR 78 is designated as a Third Priority Scenic Highway in the San Diego County Scenic Highway Element of the General Plan. SR 79 is designated as a Second Priority Scenic Highway. For purposes of this review, the designation of SR 79 takes priority, and SR 78/79 has been evaluated as a Second Priority Scenic Highway.

Hoskings Ranch would avoid significant effects on visual resources along SR 78/79 by retaining large lots along the roadway and by siting pads away from the highway where they would be screened by the existing topography. The Proposed Project's design leaves a majority of the site undisturbed. Additionally, the agricultural component of the Proposed Project would be consistent with the agricultural vistas elsewhere in the viewshed. The Proposed Project would not create a visual impact to the viewshed from the highway or from other surrounding viewsheds. Details are discussed in Chapter 3.1.1, Visual Resources.

### **1.3 Project Location**

Hoskings Ranch is located in an unincorporated area of east-central San Diego County, approximately one mile southwest of the unincorporated town of Julian. It lies immediately south of SR 78/79 and west of Pine Hills Road. The intersection of SR 78/79 and Pine Hills Road forms the northeast corner of the site. The general site location can be found in The Thomas Guide (2004) – San Diego County, pages 1135 and 1155. Primary access to the site would be from Pine Hills Road to the proposed Tenaya Road. A second access to the site would be from SR 78/79 to Hoskings Ranch Road to Daley Flat Road. See Figure S-1, "Regional Vicinity Map," for the general location in the County. Figure 1-1, "Project Tentative Map," shows the access points, and Figure 2-3-1, "Existing Circulation Network," shows the Project site's circulation system.

#### **1.3.1 Regional Setting**

Hoskings Ranch is situated on the south-facing foothills of the Volcan Mountains at elevations ranging from 3,100 to 4,200 feet AMSL. The site is approximately 60 miles northeast of downtown San Diego and 20 miles east of Ramona. It is located within the Julian region of the Peninsular Ranges Province, a 300-mile long California geomorphic province. This portion of the province lies near the geographic center of San Diego county.

The region's mountainous topography is characterized by forested hillsides and intervening small valleys, many of which support cattle grazing or other agricultural activities. Steep canyons are common and are usually accompanied by water courses. The San Diego River has its origins in this area. The site is located within the Temescal

Canyon/Orinoco watershed, which encompasses the generally south-facing slopes west and south of Julian. Figure 1-5 shows the topography on the site and in the vicinity.

Hoskings Ranch is situated in the San Diego Air Basin. The terrain and geographical features of the basin determine the distinctive climate of the region. The basin is bounded on the west by the Pacific Ocean and on the east by mountains and canyons. The region is within the semi-permanent high-pressure zone of the eastern Pacific, resulting in a mild climate with cool sea breezes. This mild pattern is subject to infrequent periods of hot weather, winter storms, or Santa Ana winds.

Local climate data can be estimated from data compiled from nearby Julian. The region has some of the highest rainfall in San Diego County, averaging 25.89 inches, generated by the west-facing mountain elevations along the interior mountain range where sea-borne moisture is trapped by desert high pressure systems, resulting in high levels of rainfall. Average annual high and low temperatures are 70.8 degrees Fahrenheit (° F) and 41.7° F, respectively. Average January high and low temperatures are 55.6° F and 34.5° F, while average July high and low temperatures are 90.1° F and 53.0° F, respectively.

The site is located approximately three miles west of the Elsinore Fault zone, one of the largest in the state. This fault zone has not been active since a magnitude 6 earthquake recorded in 1910. The Proposed Project, like all of San Diego County, is located in Seismic Zone 4, indicating it is subject to ground shaking. Therefore, the Proposed Project would conform to provisions of the Uniform Building Code as they relate to earthquake safety.

Unique natural features in this region include the large plateau below and to the west of Hoskings Ranch, Dye Mountain to the west, and the Volcan Mountains to the north. The plateau is characterized by open rolling country which is devoted largely to agricultural uses such as grazing, viniculture, stables, and hay production. Population density is moderate, with large areas of low density and a few higher-density suburban-type developments closer to the town of Ramona. The mountain region is characterized by steep terrain, rolling hills, and small valleys that tend to be developed with farms that support cattle grazing and small-scale orchards. The region is generally undeveloped, in part because large areas are publically owned, such as the Cleveland National Forest and Cuyamaca State Park. Population density is low. Julian is the only town in immediate the area.

Biological resources in the region are characterized by oak woodland, hillsides of chaparral, and native and non-native grasslands. Riparian habitats are located in the area and are associated with many of the water courses in the region.

The Proposed Project is in an area that has potential pre-historic and historic significance. Records indicate that the San Dieguito culture occupied the area between 9,030 years Before the Present (BP) ± 350 to 7,500 BP. Migrants from the desert to the east gradually moved into the area beginning around 3,000 BP. The expeditions of Cabrillo in 1542 brought contact between the native population and the Spanish. At the time of contact with European culture, the area was primarily settled by the ancestors of the modern-day Kumeyaay (Southern Diegueno) Indians, who occupied southern San Diego County.

Between the 1860s and the early 1900s, the discovery of gold in the Julian area accelerated the settlement of San Diego's mountainous east county. The development of Julian and the surrounding area followed closely thereafter. Following the end of the

gold boom, agriculture, largely cattle grazing, and tourism gradually developed to support the economy. Agri-tourism is now a mainstay of the local economy.

The Julian Town Center, which is characterized by a mixture of predominantly residential and commercial uses, is approximately one mile east of the proposed site. The Town Center is designated as the Julian Historic District and was established to “preserve what remains of Julian City which was created in 1870 to provide goods, services and housing for a population spawned by a gold rush ...”<sup>3</sup> The Historic District of Julian is renowned for retaining the architectural authenticity of the original town, early settlement. Its commerce is based on tourism, which is in large part driven by the mountain setting, historic preservation, and agri-tourism. The region is served by one major roadway, SR 78/79, which connects Julian and the Ramona area with population centers along the coast, and the desert areas to the east.

### 1.3.2 Environment On-site and in the Immediate Vicinity

The Proposed Project Site is approximately 40 miles inland from the coast in central San Diego County. It lies within the mountain foothills east of the coastal plain and west of the low desert.

Figure 1-6, “Surrounding Land Uses,” shows uses in the area surrounding Hoskings Ranch. Land uses in the immediate vicinity include open land, scattered large residential lots, and agriculture. Land to the west and northwest is undeveloped and consists of forested land and grassland. Areas north and central to the Proposed Project consist of residences on lots that range in size from 8 to 60 acres, a baseball field, and large open tracts with scattered tree cover and some agricultural use consisting of pastureland. Many of these lots are within an agricultural preserve which allows 15-acre minimum lot sizes.

SR 78/79, a second priority scenic highway, runs along the north east boundary of the proposed site. Uses along the highway consist of scattered residences, grazing land, a sewage treatment facility, and forested land. The community of Wynola, located 1.5 miles northwest of the site, supports a strip of commercial markets catering to the agricultural economy of the area, restaurants, orchards, and residences. The town of Julian is located one mile east of the site and consists of a concentrated commercial district based on the historic and agricultural identity of the town. Residences are scattered throughout the area and represent a mix of rural, town, and suburban home types. Agriculture is common in the area and consists of vineyards, orchards, cattle breeding, grazing, berry growing, and apiary activity.

Pine Hills Road runs parallel to most of the eastern site boundary. Scattered large residential lots and agricultural operations ranging in size from two to 50 acres are located east of the site. Cattle breeding and pasture are the agricultural uses in this area. 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. Fruit orchards occur in the area adjacent to the site on the southeast. Pine Hills, a residential mountain community, is approximately 1.25 miles south of the southeast corner of the site. Lot sizes in Pine Hills range from one-half to 17 acres in size. As one travels west along Hoskings’ southern boundary, the topography becomes very steep. This area is largely undeveloped and consists of undisturbed native habitats.

<sup>3</sup> Julian Community Plan, page 51



Orinoco/Temescal Canyon Creek parallels the Proposed Project's southern boundary as it flows east to west toward the San Diego River. This 7.2-mile long creek originates approximately a mile southeast of Julian and flows south and west, passing north of the community of Pine Hills and south of Hoskings Ranch. The creek name changes to Temescal Canyon Creek near a waterfall located offsite and before it flows to the San Diego River, located less than a mile west of the site. Land offsite to the west consists of steep slopes associated with Dye Mountain. Privately owned lots are located within the Cleveland National Forest west of the Proposed Project's boundary. They range in size from 40 to 120 acres and are largely undeveloped.

The Proposed Project Site has four distinct topographic regions. The northeastern area of the site consists of rolling hills characterized by grazing land with scattered oaks. The central area is relatively flat in the north and falls off steeply to the south. The southwest area is relatively flat and is at a lower elevation than the northern and eastern portions of the site. The southern boundary follows Orinoco Creek. The southern part of Hoskings Ranch is within the Cleveland National Forest, which extends beyond the site boundaries to the south and west.

The Proposed Project Site is located in a drainage shed approximately of 8.0 square miles that consists of 12 major drainage basins. The land generally drains from north to south via a series of unnamed courses that vary in width from inches to several feet. The largest drainages are in the central and western part of the property. Runoff from ten of the site's basins discharges directly or indirectly into Temescal Canyon Creek. One basin in the northwest corner of the site discharges directly into the San Diego River, and a second in the eastern part of the site discharges into Sentenac Creek, which flows westerly to the San Diego River.

The property supports six broad categories of plant communities: Chaparral (approximately 214.4 acres), Scrub (150.3 acres), Woodland (545.4 acres), Herbaceous Uplands (452.1 acres), Wetland (53.73 acres), and Unvegetated habitats (less than an acre). Many of these habitats are also found offsite in the immediate vicinity of the property. Detailed descriptions of the existing biological conditions on the site are discussed in Chapter 2.1, Biology.

#### **1.4 Intended Uses of the ~~DEIR~~FEIR**

This is a project ~~DEIR~~FEIR because it examines the environmental impacts of a single project. The ~~DEIR~~FEIR is an informational document which will inform public agency decision-makers and the public generally of the significant environmental effects of the Proposed Project, identify possible ways that significant effects can be minimized, and describe reasonable alternatives to the Proposed Project. The ~~DEIR~~FEIR will also be used to evaluate the impacts of amending the Proposed Project's Williamson Act Contract to allow reclassification of those areas onsite currently requiring a 160-acre lot minimum to a minimum of 40 acre lots.

#### 1.4.1 Matrix of Project Approvals/Permits

Discretionary Approval/Permit	Approving Agency
Tentative Map	County of San Diego (CSD)
Habitat Loss Permit	CSD
Grading Permit	CSD
Final Subdivision Map	CSD
County Right-of-Way construction, Excavation and Encroachment Permit	CSD, Caltrans
Amendment of Williamson Act Contract per Board Policy I-38	CSD
Vacate Easements per Board Policy I-103	CSD
1603 Streambed Alteration Agreement	CDFG

#### 1.4.2 Related Environmental Review and Consultation Requirements

Wildlife Agencies have visited the Project Site and have commented on the **DEIR/FEIR** as part of their role in administering the Natural Community Conservation Planning (NCCP) program. The U.S. Forest Service may comment on the plans for use of Proposed Project lands in the Cleveland National Forest. Caltrans has been consulted as related to possible work in their right of way to improve sight distance at SR 78/79 and Pine Hills Road.

#### 1.5 Project Inconsistencies with Applicable Regional and General Plans

The Proposed Project has been evaluated in relation to the applicable elements of the County of San Diego General Plan (GP), the Julian Community Plan, County of San Diego Zoning Ordinance, Regional Housing Allocation Plans, Regional Air Quality Strategy (RAQS), San Diego County Air Pollution Control District (APCD), the Regional Water Quality Control Board's Basin Plan for the San Diego area, SANDAG's Growth Forecast and Congestion Management Plan, and Caltrans' Regional Transportation Plan. No inconsistencies with the above-listed regional and general plans have been found.

#### 1.6 List of Past, Present, and Reasonably Anticipated Future Projects in the Project Area

The cumulative projects list consists of past, present, and reasonably expected projects in the region that could contribute to a cumulative impact. The general study area was determined using County maps of recent and active projects. The study area was defined geographically as the areas on the west facing slopes of the Volcan Mountain in the vicinity of Julian on the east and Santa Ysabel on the southwest. It includes the Pine Hills Community and Daley Flat as well as areas east and south of Julian. This area was chosen because the western slopes of the mountain share a similar climate and because the area shares a similar land use pattern of mixed rural and agricultural uses that are a response to agricultural tourism common in the Julian vicinity. Study areas for each subject discussed in the **DEIR/FEIR** are further defined within that subject area discussion. Ninety projects were reviewed for potential impacts. The cumulative impact of each subject area is discussed in

Chapters 2 and 3. Projects are listed in Table 1-1, "Cumulative Projects." A map is provided showing the cumulative projects in relation to the subject property. See Figure 1-7, "Master Cumulative Impacts Map," and subsequent detail maps 1-8A through 1-8E.

## **1.7 Energy Conservation**

Appendix F of the CEQA Guidelines provides guidance for analyzing significant energy implications of a project. The introduction states that "[t]he goal of conserving energy implies the wise and efficient use of energy." Three means of achieving this goal are provided:

1. Decreasing overall per capita energy consumption;
2. Decreasing reliance on fossil fuels such as coal, natural gas, and oil; and
3. Increasing reliance on renewable energy sources.

Emphasis in the discussion should be on "avoiding or reducing inefficient, wasteful and unnecessary consumption of energy."

### **1.7.1 Consumption and Effect on Energy Resources**

The Project proposes 24 residential lots and biological open space on a 1,416.5-acre site. It will depend on groundwater for potable water needs and septic systems for wastewater disposal. Heating would be generated from natural gas delivered to the site via San Diego Gas and Electric (SDGE) pipelines. Grazing/cattle breeding will continue as a component of the Project.

Energy will be used in three forms: electricity, gas, and fuels. The following table lists the ways in which these forms of energy will be used by the Project:

Table 1-2 Project Energy Use by Energy Type and Use Categories

<b><u>Use Type</u></b>	<b><u>Electricity</u></b>	<b><u>Gasses Related to Building Use(1)</u></b>	<b><u>Transportation Fuels(2)</u></b>
<u>Construction</u>			
<u>Vehicles</u>			<u>X</u>
<u>Materials(3)</u>	<u>X</u>	<u>X</u>	<u>X</u>
<u>Machinery</u>	<u>X</u>	<u>X</u>	
<u>Transportation</u>			<u>X</u>
<u>Operation</u>			
<u>Home operation</u>	<u>X</u>	<u>X</u>	
<u>Irrigation</u>	<u>X</u>		
<u>Agriculture</u>	<u>X</u>		<u>X</u>
<u>Transportation</u>	<u>X</u>		<u>X</u>

- (1) Primarily natural gas for home operation.
- (2) Primarily gasoline and diesel fuel
- (3) Includes embodied energy, or energy needed to manufacture and transport materials.

Energy use during construction will include operation of construction vehicles such as excavators, scrapers, forklifts, and rollers. Energy used to fabricate, finish, and transport building materials is embodied in the material used. Electricity would be used for construction lighting, field services (trailers), and electrically driven construction equipment such as air compressors, drills, saws, and pumps, among other equipment. Fuel use would be associated with gasoline- and diesel-powered mobile construction equipment and commuting of workers to and from the construction site. Full details of energy use are provided in the air quality and global climate change reports associated with this DEIR (Appendices H and I respectively).

The major energy use during operations would be for heating and cooling of houses, followed by lighting. Energy will also be required to operate pumps that will supply water to residents for home use and agriculture. Energy will also be expended by the on-going grazing/cattle breeding operation. This will be in the form of feed and transportation for cattle and vehicle operation by ranchers. Finally a small amount of fuel will be expended by biologists and grazing managers inspecting the site.

Most residential functions such as lighting and cooling will use electricity. Heating is typically generated from natural gas, discussed below. Grazing/cattle breeding currently exists over the entire 1,416.5-acre site, although only approximately 750 acres are ideally suitable for grazing due to steep slopes and impenetrable and unpalatable vegetation. Grazing contracts allow for 160 head to be grazed on the site. Current use for grazing is approximately 80 head. Overall grazing numbers will be reduced on the site to approximately 60 head under the Conservation Grazing Management Plans proposed for the Project. Energy use for cattle grazing can be estimated based on the number of head being raised. A *Dairy and Livestock* research report for the California Daily Energy Project (C. Collar et al.) estimated that dairy cattle on the California farms studied amounted to 516 kWh per year per cow. The use of dairy farm data represents a conservative approach to grazing energy use due to the greater amount of machinery involved. Using this measure, the Project will result in a decrease of electrical energy use for cattle grazing/breeding of approximately 51,600 kWh or 63 percent from allowed levels and 10,320 kWh or 25 percent from current levels. Therefore energy demand associated with cattle grazing/breeding is not included in the analysis due to this reduction in current demand.

A single family home in California is expected to use 7,605 kWh of electricity per year (2009 California Appliance Saturation Study, Executive Summary, Figure ES-1 and Table ES-2, (California Energy Commission (CEC) document # 200-2010-004-ES, 2009). The Project's electrical energy use would therefore be 182,520 kWh of electricity per year. Overall annual residential energy use in San Diego County in 2013 was 6,775.22 million kWh (Department of Conservation, [ecdms.energy.ca.gov/elecbycounty.aspx](http://ecdms.energy.ca.gov/elecbycounty.aspx)). The Project represents less than a hundred

thousandth of the total County residential electricity use. It will therefore have a minimal effect on overall energy use in the County. Nevertheless, the Project incorporates energy efficiency measures which are discussed below in Section 1.7.6.

Average household natural gas use in California in 2012 was 373 Therms per year. For the 24 lot Project this amounts to 8,952 Therms annually. ([http://www.energyalmanac.ca.gov/naturalgas/residential\\_natural\\_gas\\_consumption.html](http://www.energyalmanac.ca.gov/naturalgas/residential_natural_gas_consumption.html)). In contrast the California Energy Commission estimates San Diego County's total residential usage at 311,180,000 Therms in 2012. (Department of Conservation, [ecdms.energy.ca.gov/gasbycounty.aspx](http://ecdms.energy.ca.gov/gasbycounty.aspx)). Project use is less than a hundred thousandth of total California residential consumption. Impacts to County of San Diego natural gas use would therefore not be significant. However, proposed conservation measures are proposed for the Project and discussed in Section 1.7.6. They are summarized as design measures in Section 7.6.1

#### 1.7.2 Effect on Energy Supplies

San Diego Gas and Electric (SDGE) is the electricity supplier for San Diego County. For 2012, SDGE reported available and planned resources of 16,614 GWh, balanced against the same amount of energy requirements. The year 2016 is projecting an excess of 205 GWh of electricity after accounting for existing and planned sources. Total Project electricity demand of 143,600 kWh of electricity, or 0.14 GWh is well within the projected excess capacity. Therefore the Project would not require construction of additional electrical generation capacity.

#### 1.7.3 Effect on Peak and Base Demand for Electricity

Peak demand for electricity occurs when so much electrical equipment is in use at one time that it places a strain on the entire electric grid system. This generally occurs in California during summer heat waves in the weekday afternoon, hours when air conditioners at both homes and businesses are running at full strength.

The Project would operate during peak energy demand periods, and so would constitute a new source of peak demand usage. Residential construction will fall under stringent 2013 Title 24 regulations unless new regulations are adopted. These regulations include extensive requirements for more sustainable and energy efficient construction practices that will affect both the types of materials used and the way in which finished systems will be tested. Title 24 provisions are detailed below. The Project's overall demand will be reduced from historic "business and usual" levels of residential energy use due to compliance with Title 24 changes.

#### 1.7.4 Transportation Energy Use

Energy will also be expended in the daily trips made by residents. The Project has been estimated to have 288 Average Daily Trips (ADT) related to residential traffic based on the traffic impact Analysis, Appendix D. Agriculturally related traffic is estimated by the traffic engineers to be approximately 2 ADT per day, as stated in Appendix D.

Attachment E. Approximately 35 percent of traffic will make local trips of 1-3 miles while 65% will travel toward Santa Ysabel (6 miles away), Ramona (22 miles away), or points beyond. Energy use in the form of gasoline will therefore increase as a result of the Project. However, several factors will combine to moderate this increase. The town of Julian is a mile from the project site and provides basic services such as grocers, restaurants, lodging, gas stations, auto repair, banking, hair salons, and computer services, among others. New title 24 regulations requires the inclusion of electrical vehicle hookups in new homes, enabling a reduction in gasoline consumption for transportation. Electric vehicle use is also projected to increase significantly statewide in the coming years, and it is reasonable to conclude that some residents would incorporate electric vehicles into their driving mix. The combination of proximity of services and a more fuel efficient vehicle mix will moderate the Project's transportation energy demand.

#### 1.7.5 Water Use and Wastewater Disposal

An average residence is estimated to use 0.5 AFY of water according to the County of San Diego Groundwater Ordinance. It takes approximately 1.37 kWh to lift an acre foot of water one foot if the pump is 75 percent efficient. A well with an average depth to groundwater of 500 feet will therefore use 1.37 kWh X 500 ft X 0.5 k annual usage to pump 0.5 AFY of water to a residence, or 343 kWh of energy per year. Water pumping for the 24 residences would be approximately 8,220 kWh. Water tanks with a capacity of 10,000 gallons will be installed on each lot to facilitate fire control. It will take an additional 0.73 AF of water to fill these tanks. The energy cost for this effort will be 500 kWh. There are four holding ponds on the site used for cattle, but these are fed from runoff and do not constitute a drain on energy resources. Additional water may come from existing natural drainage features. There are no wells dedicated to watering cattle. Total energy use related to water use is therefore estimated at 8,720 kWh. Wastewater will be disposed of in septic systems. These systems usually rely on gravity to move wastewater, and therefore do not constitute an energy drain.

#### 1.7.6 Energy Conservation

The State of California controls building standards throughout the state through Title 24. The 2013 standards have undergone a significant revision that mandate greater energy conservation in the construction and operation of all buildings. The California Energy Commission expects the new standards to reduce annual electricity consumption by 613 gigawatts (GWh) and natural gas consumption by 10 million Therms per year (CEC, Title 24, 2013). These changes affect all aspects of the building and operation of buildings. Construction management is required and will be utilized to reduce vehicle idling times, ensure vehicles are running efficiently, and promote the recycling of construction materials. In particular single family residential development standards mandate new energy efficiency in windows, building envelope, insulation, and heating, ventilation, and air conditioning (HVAC) systems. There are new building simulation tools that interface with Title 24 and that allow builders to make tradeoffs between energy saving devices. Several of the new features are outlined in the following table.



**Table 1- 3 Title 24 2014: Selected Energy Efficiency Requirements**

<u>Improved heating and cooling controls</u>
<u>Control air leaks at windows and doors</u>
<u>Double paneled windows to provide better insulation against energy loss windows</u>
<u>Greater efficiency of joint seals</u>
<u>Automatic timing switches on all lighting such as dimmers, daylight controls, occupant sensing controls, part-night sensing controls</u>
<u>Solar ready construction</u>
<u>Improved wall insulation efficiencies</u>
<u>Mandatory reduction in indoor and outdoor water use</u>
<u>Recycling of construction waste</u>
<u>Lower Volatile Organic Compound content in paints, sealants, and similar materials</u>
<u>Increased efficiency of appliances</u>

It is estimated that it takes 13,022 kWh to import each million gallons of potable water into the region (Green House Gas Analysis, Ldn Consulting, and May 13, 2014). The energy required to pump a comparable amount of water on the site would be 2,102 kWh. The energy cost of water use by the project is therefore lower than a comparable project within the County Water Authority Line using imported water.

Finally, SDGE is expanding its portfolio of renewable energy sources such as wind, solar, and geothermal energy. Energy from these sources will be fed into the electricity grid and distributed to customers. As SDGE customers The Project residents will indirectly participate in the increased use of renewable energy.

#### 1.7.7 Conclusions

The proposed project will consume energy in the construction and operation of 24 residential homes. Construction energy use will be limited in scale and the construction management plan for the Project will include measures to prevent the waste of energy. The Project will incorporate measures to increase energy efficiency and prevent waste through 2013 Title 24 requirements. Operational aspects represent a very small fraction of overall electrical and natural gas energy use in San Diego County. SDGE has the capacity to serve the Project without the construction of new facilities. Transportation energy will not be wasted because destinations that can meet residents' needs for services already exist in the area. Alternative energy use will take place in the form of a projected increase in use of electric vehicles, and reliance on SDGE's expanding portfolio of alternative energy sources. Although the Project will increase energy usage in the County, this increase is small. The Project reduces its energy use over and above

a historic “business as usual” approach by adhering to sustainable building practices such better insulation, solar energy ready construction, and improved controls in buildings for lights and heating/air conditioning.

#### **1.71.8 Growth-Inducing Effects**

The Proposed Project was analyzed for its potential to induce growth in the area. A project can foster economic or population growth, directly or indirectly, when it leads to the construction of additional housing. Removing obstacles to growth, for example by extending utilities to a project, could also be growth inducing.

The Proposed Project could foster economic growth because the subdivided lots are designed to promote agricultural uses. However, Julian has been an agricultural region for decades with an active and successful agri-tourism industry. The absorption of the lots is expected over a 10 to 14 year period. The addition of these sites would gradually support the existing economy in the area but would not introduce a new or dramatically expanded component to the economic picture of the area.

Population growth would be gradual, as would absorption of the proposed lots into the local economy. Total additional population expected over the next ten years in Julian is approximately 1,093 people, an increase of approximately 3.5 percent per year. The Proposed Project would potentially introduce approximately 72 people to the area in this time, an increase of less than 0.1 percent per year, well below the predicted rate. Therefore the Proposed Project would not induce population growth over and above rates that are already projected.

The Proposed Project would not remove obstacles to growth. New infrastructure would include ~~a 5.0-acre site for a fire station~~, access roads, and lateral lines for electric and gas service. Each lot would provide its own water supply and septic system. No additional infrastructure capacity would be provided. ~~The fire station site would be provided to the Julian/Cuyamaca Fire Protection District as a public service and is not required as mitigation for project impacts. The station site is being provided at the request of the Julian/Cuyamaca Fire Protection District as part of their effort to have a training facility and locate a fire protection facility closer to areas that were burned in 2003. As evidenced by the Cedar and Witch Creek fires, the area is vulnerable to fire and additional fire service facilities are needed to meet existing needs. This is an expansion of fire service to meet the existing needs of the community and the Project Site. The Proposed Project simply provides a public service in this respect. Other infrastructure is provided solely for the Proposed Project.~~

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

This page intentionally left blank

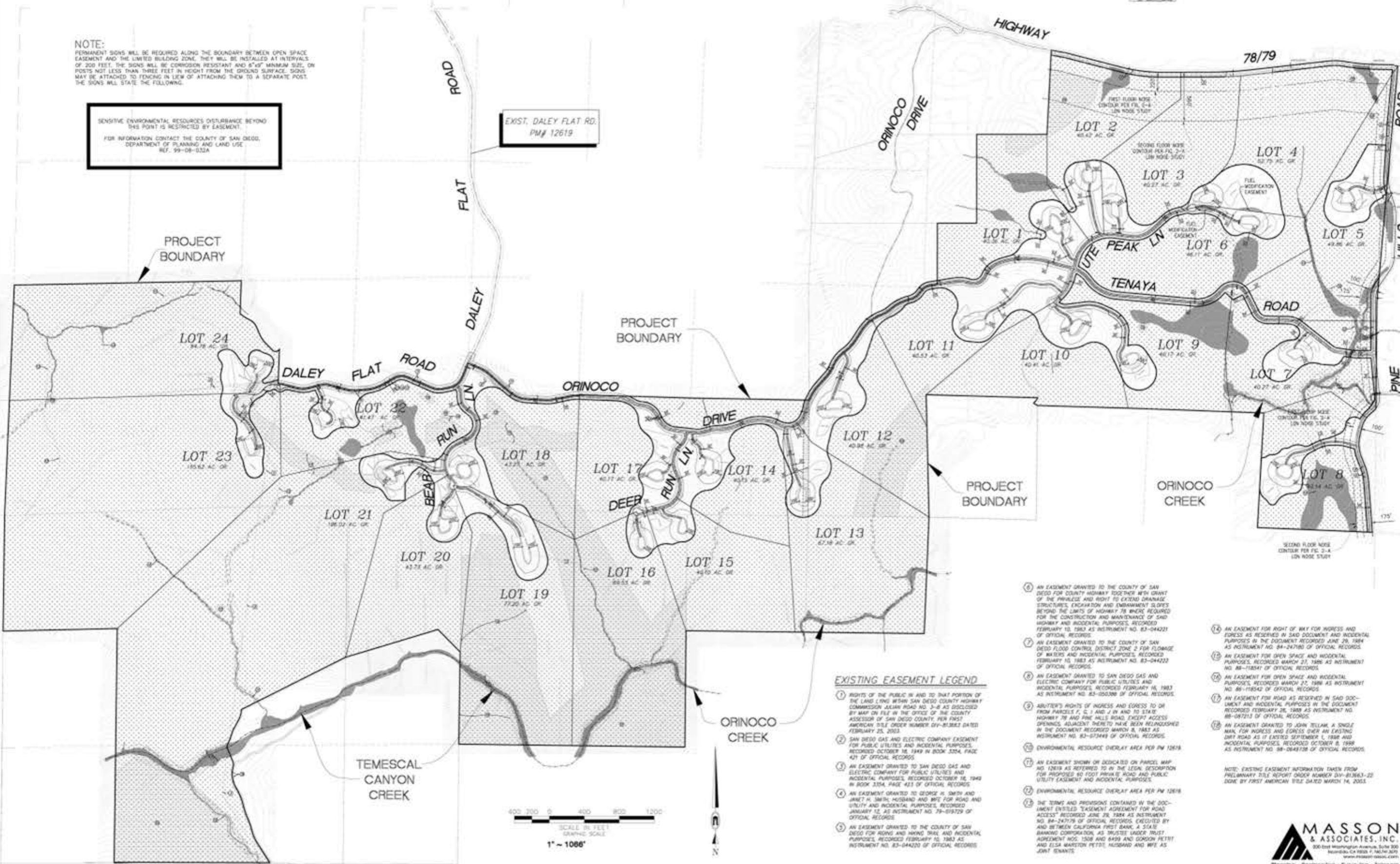


**NOTE:**  
PERMANENT SIGNS WILL BE REQUIRED ALONG THE BOUNDARY BETWEEN OPEN SPACE EASEMENT AND THE LIMITED BUILDING ZONE. THEY WILL BE INSTALLED AT INTERVALS OF 200 FEET. THE SIGNS WILL BE CORROSION RESISTANT AND 8"x9" MINIMUM SIZE. ON POSTS NOT LESS THAN THREE FEET IN HEIGHT FROM THE GROUND SURFACE. SIGNS MAY BE ATTACHED TO FENCING IN LIEU OF ATTACHING THEM TO A SEPARATE POST. THE SIGNS WILL STATE THE FOLLOWING:

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

**LEGEND**

- PROPOSED OPEN SPACE EASEMENT
- FIRST O.S. EASEMENTS AND ENVIRONMENTAL OVERLAY ZONES PER PM 12619
- EXISTING FLOOD CONTROL EASEMENT PER DGC # 83-044221 / 02-10-1993
- RPO = WETLANDS





Conceptual Layout of Clear Sight Triangle       Existing = 400 feet



Tree trimming north from the project entrance on Pine Hills Road

Conceptual Layout of Clear Sight Triangle       Existing = 535 feet



Tree trimming east from the intersection of Pine Hills Road with SR78/79

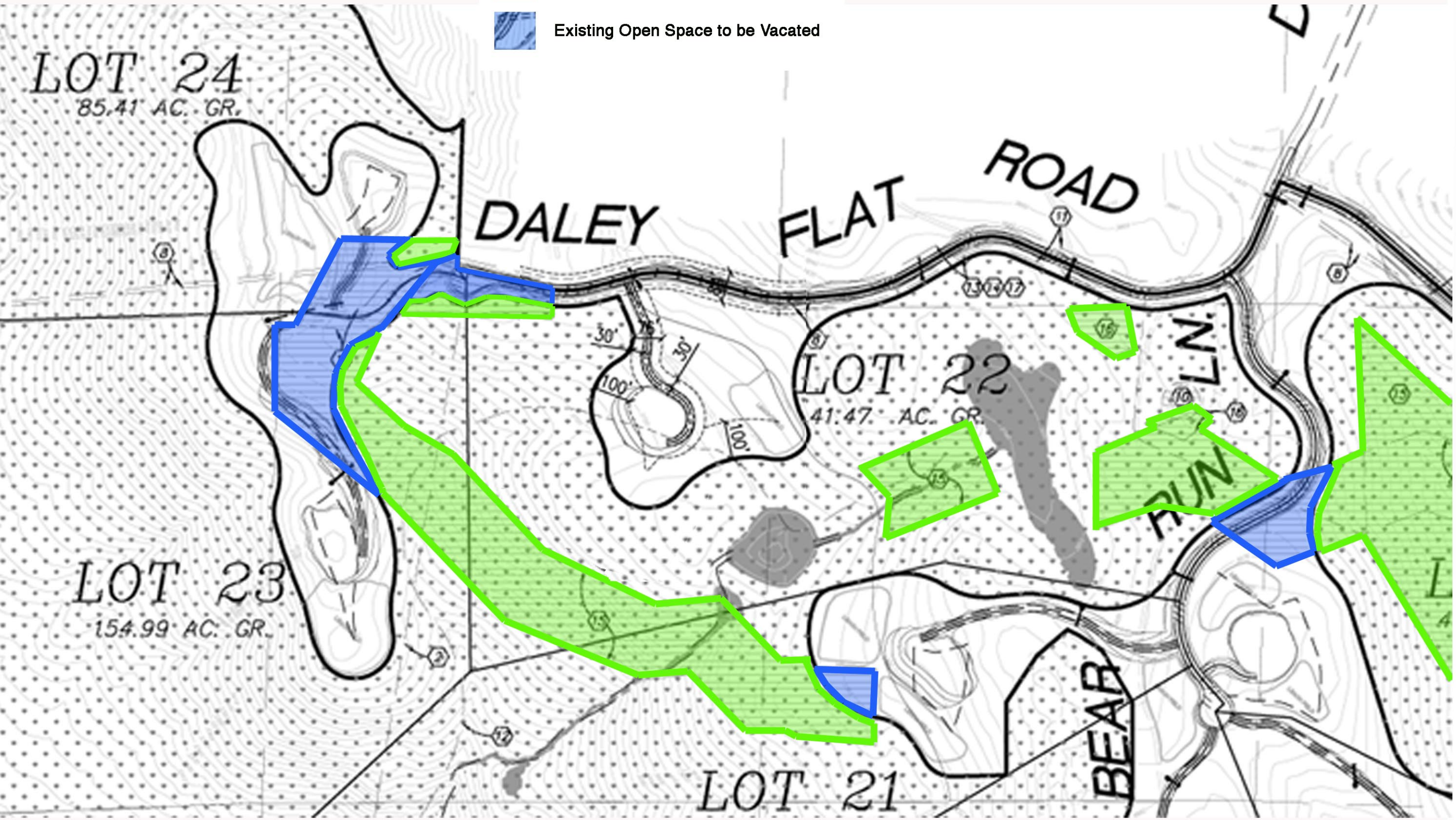




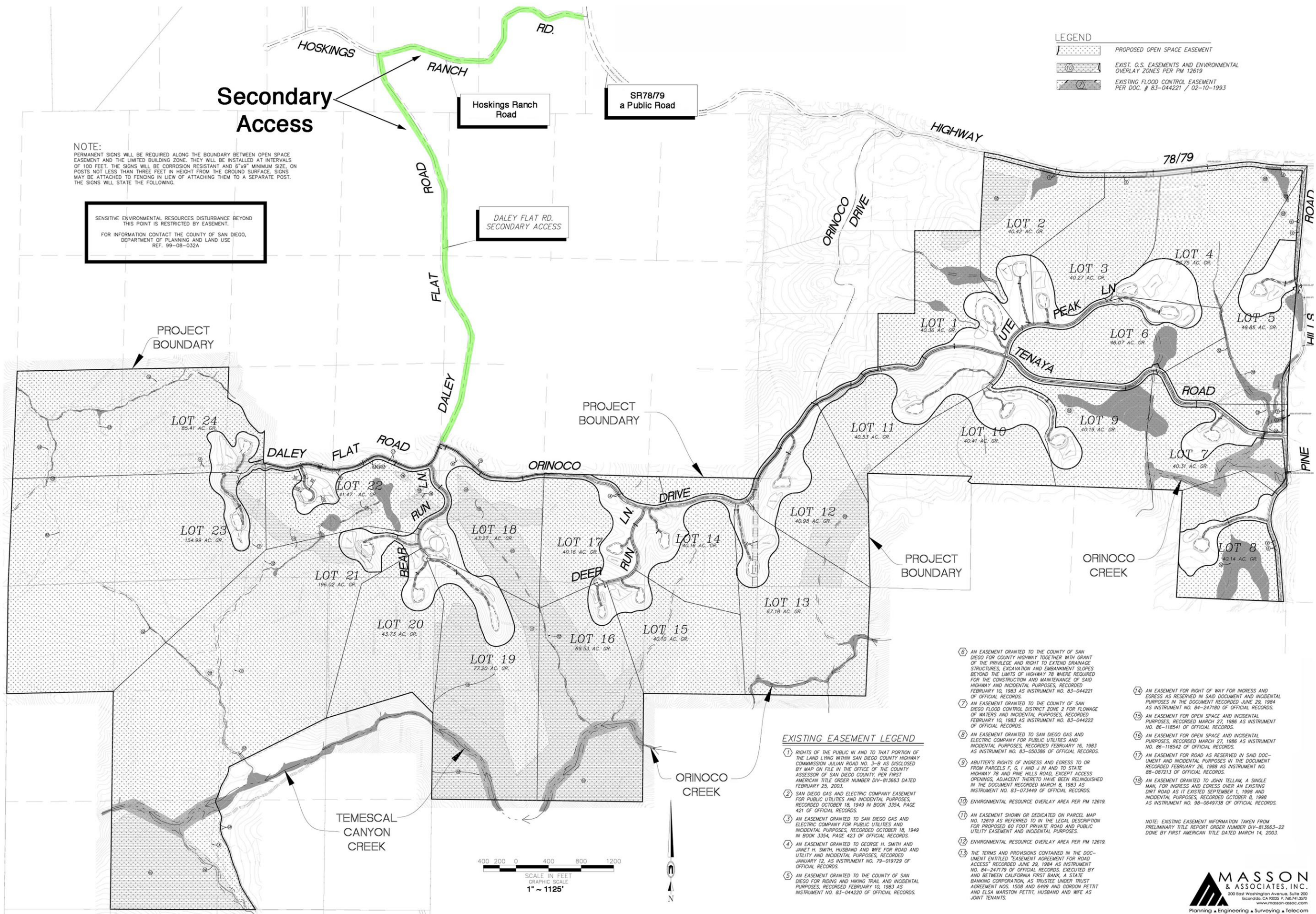
Existing Open Space to Remain



Existing Open Space to be Vacated







**Secondary Access**

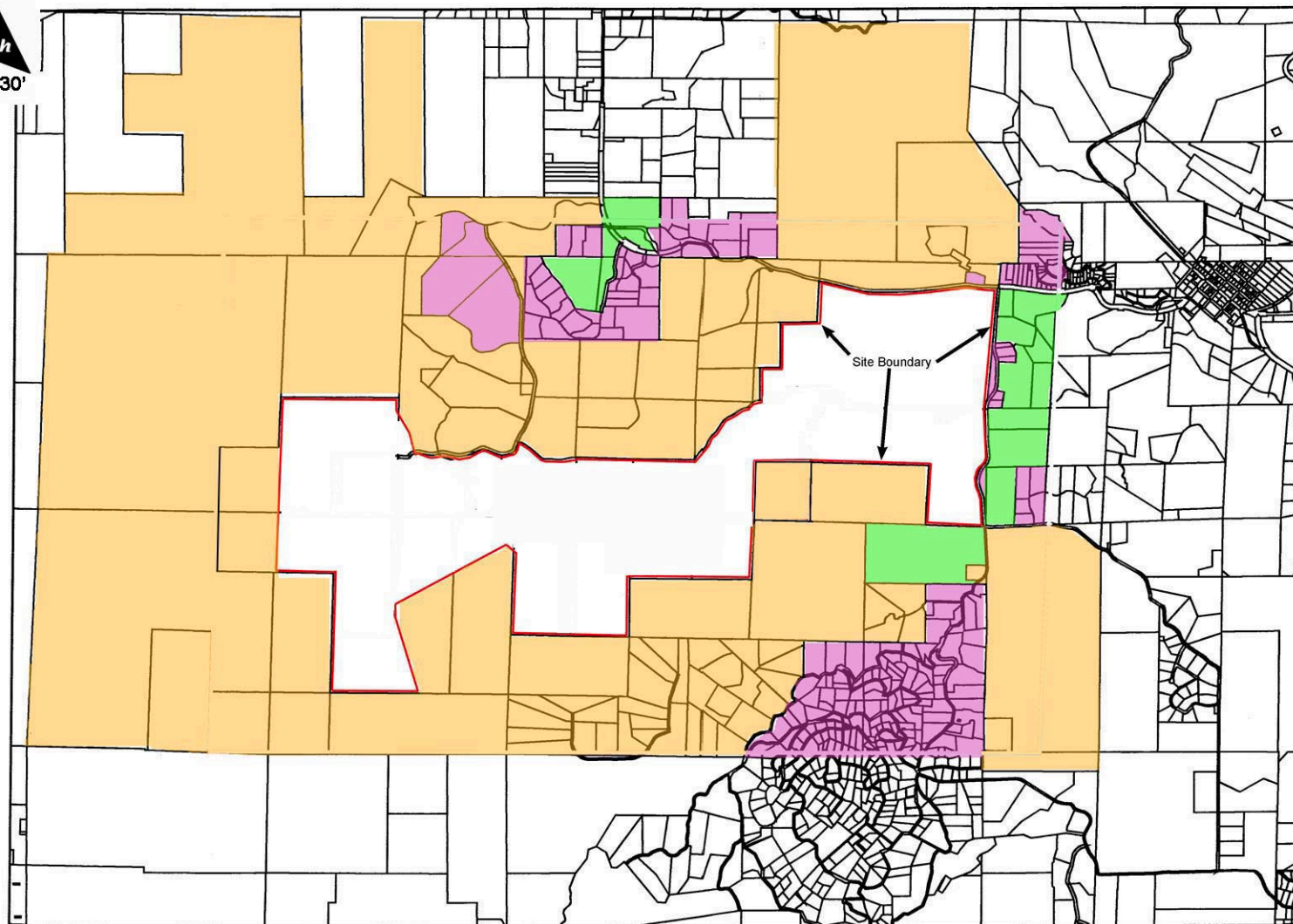
**Figure 1-4**





**Figure  
1-5**





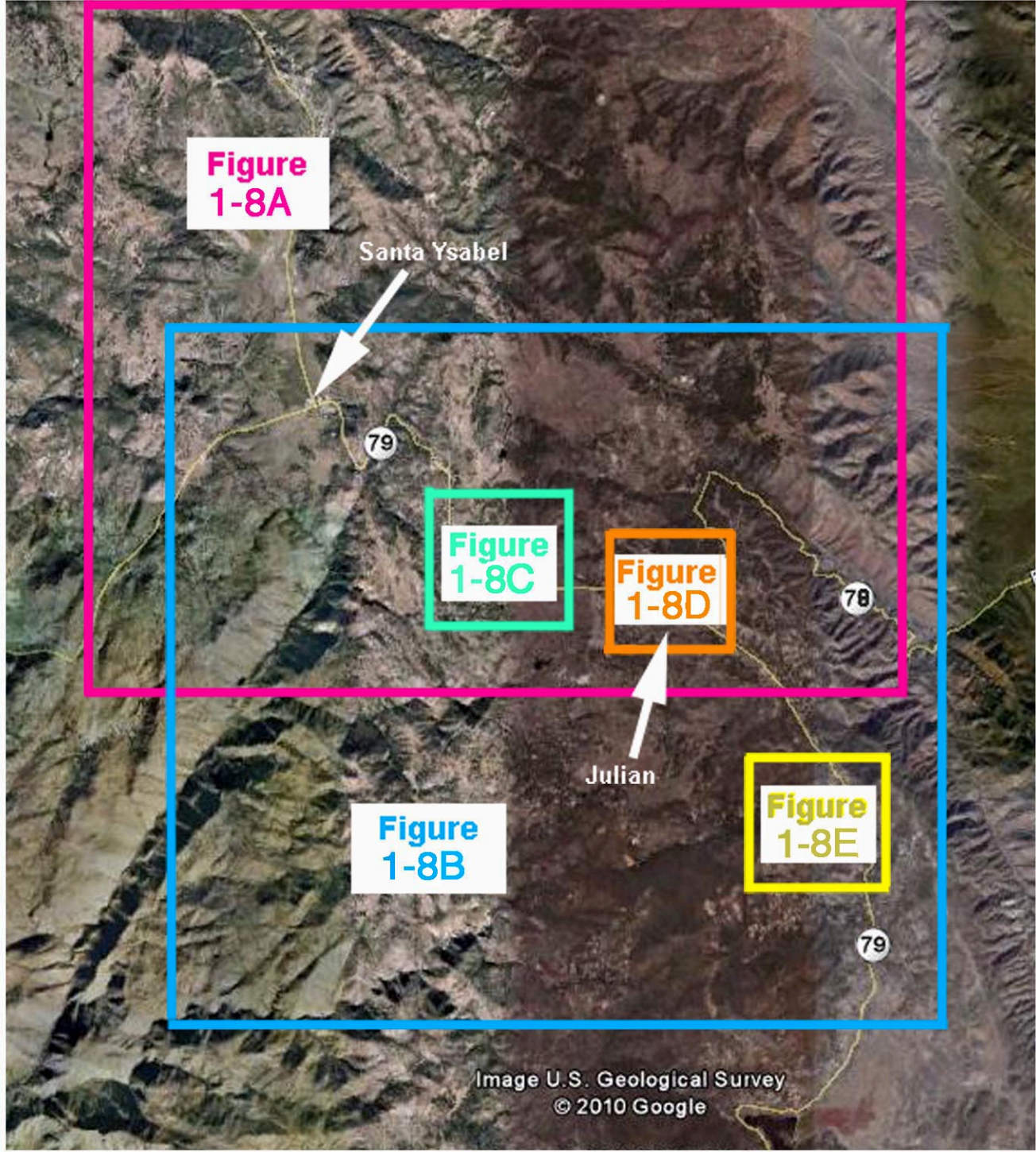
TM 5312  
Hoskings Ranch

- Parcels
- Protected Resource Land
- Agricultural Land
- Residential

Figure  
1-6

## Surrounding Land Uses







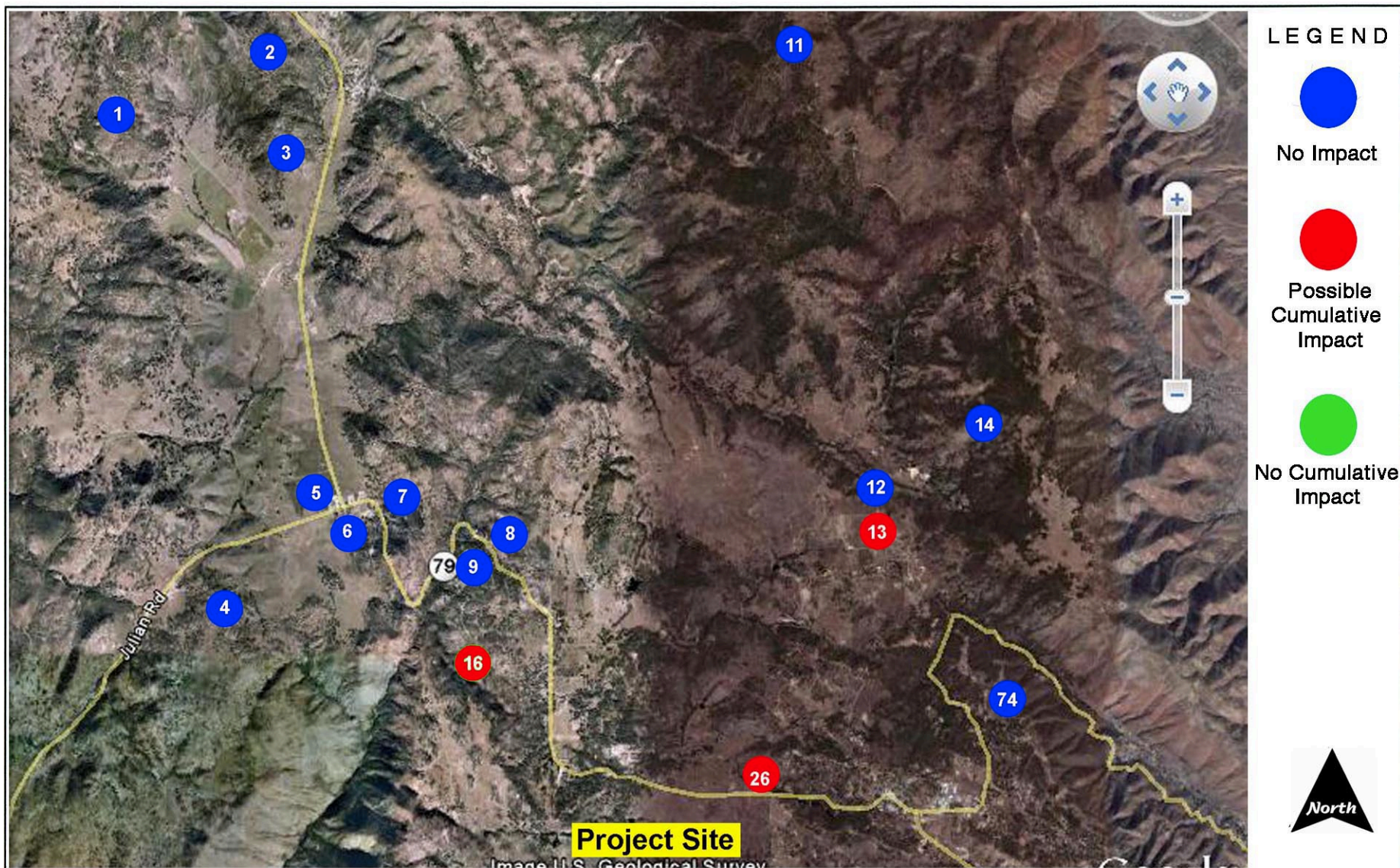
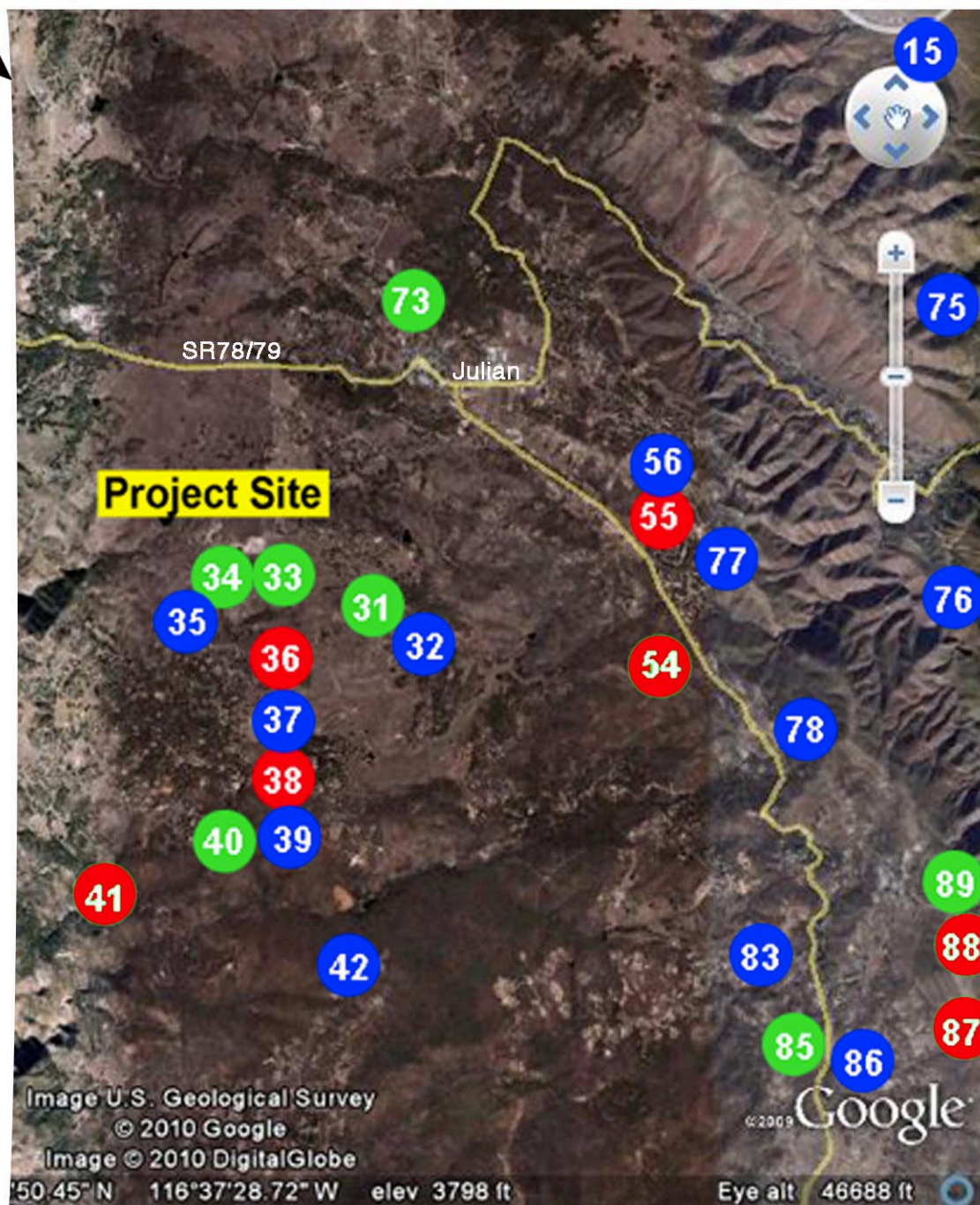


Figure  
1-8A

Cumulative Impacts Map





### LEGEND

  
NO IMPACT

  
POSSIBLE  
CUMULATIVE  
IMPACT

  
NO CUMULATIVE  
IMPACT



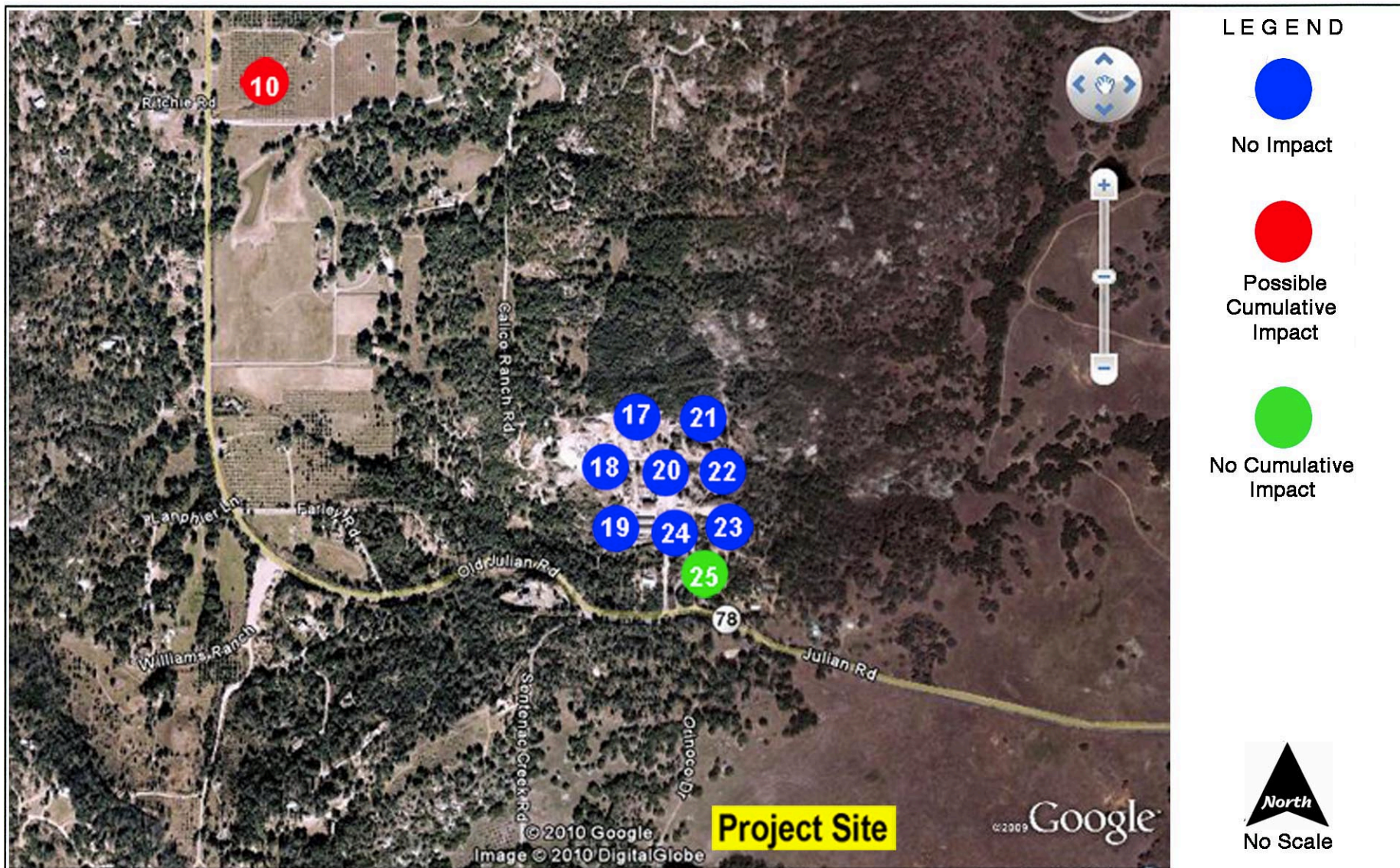
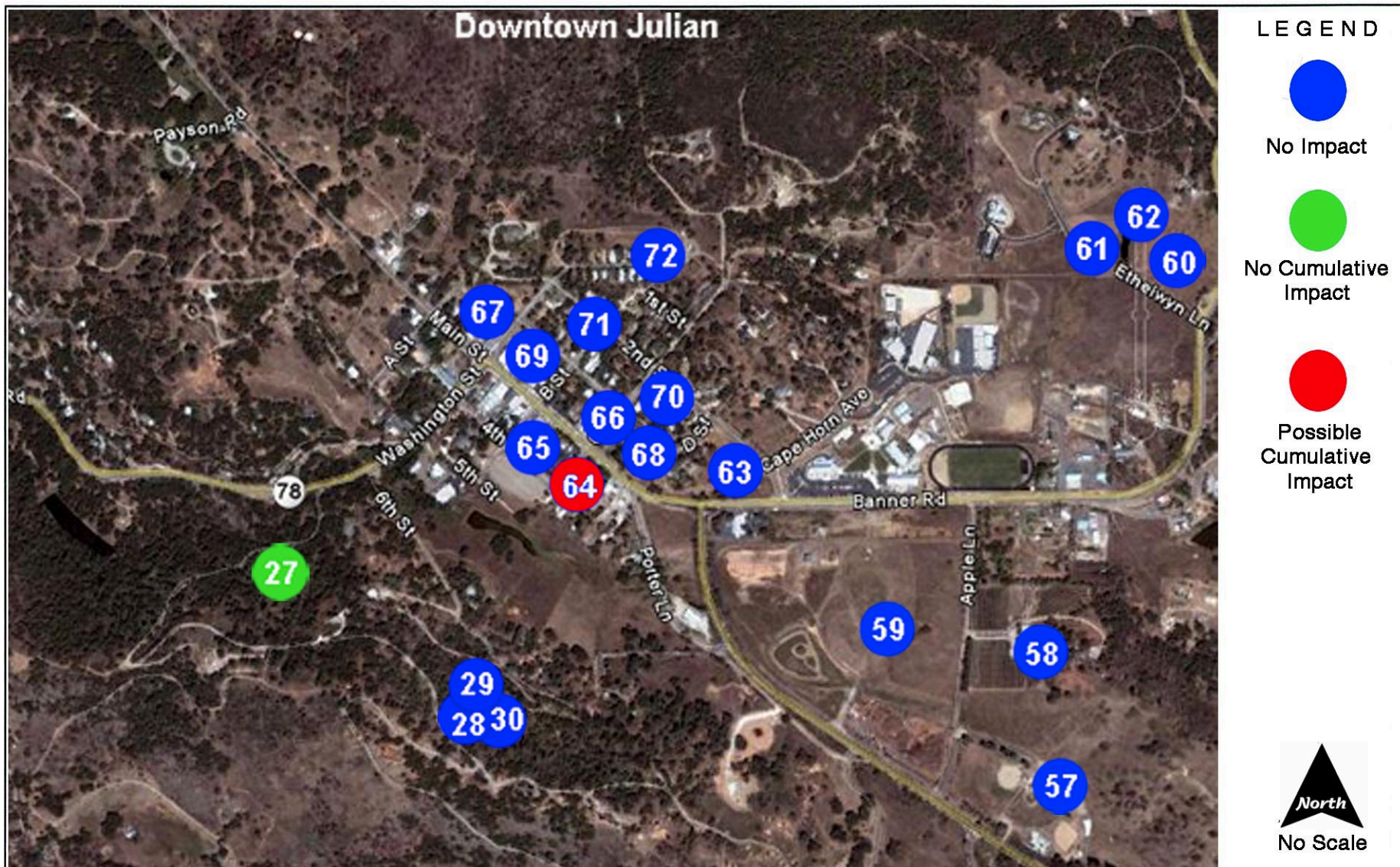


Figure  
1-8C

Cumulative Impacts Map





**Cumulative Impacts Map**



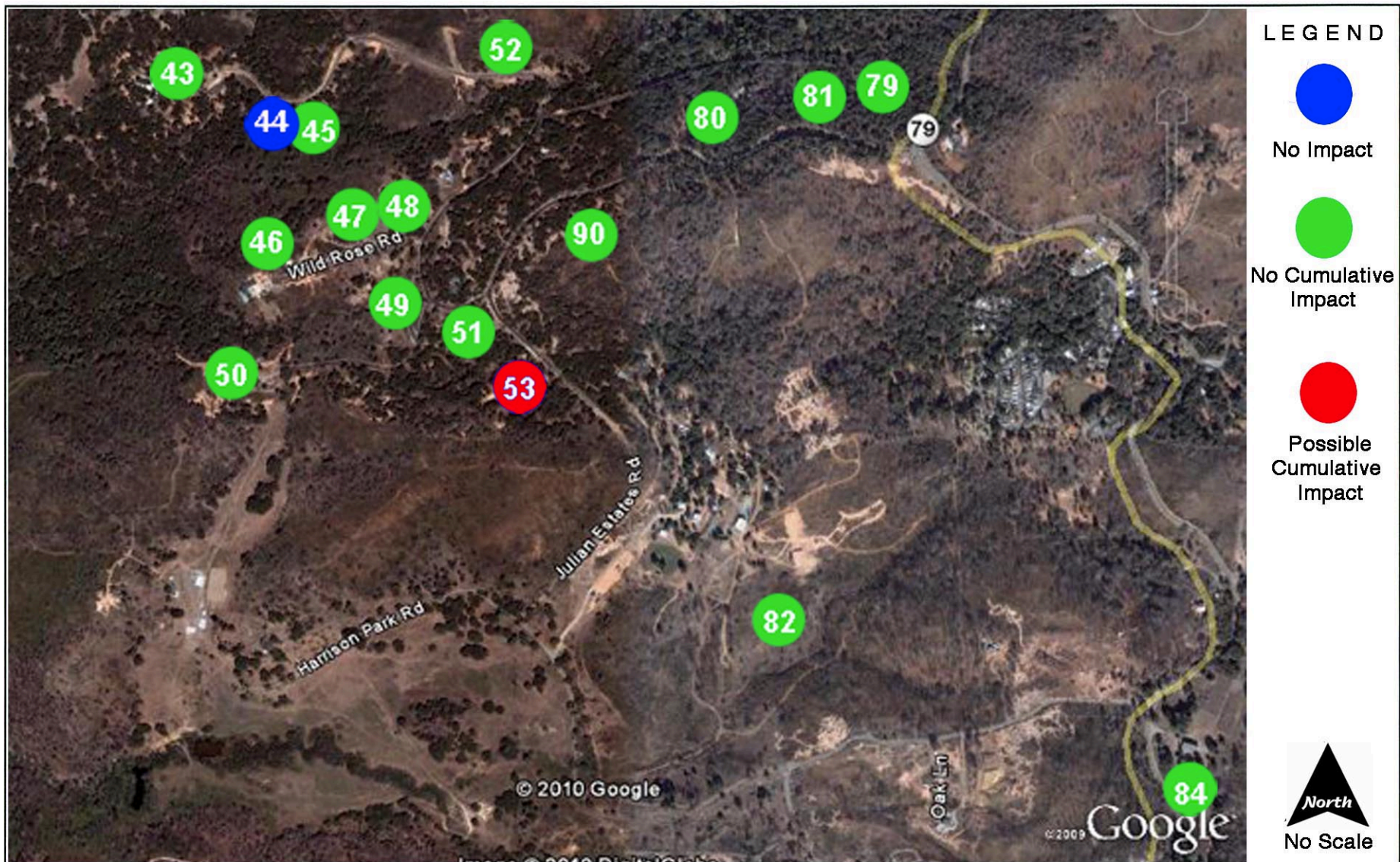


Figure  
1-8E

Cumulative Impacts Map



Fig.** #	Project Number – Name - Description	Impact/Mitigation
1	TM 5526 – Los Robles Rch	Withdrawn
2	MUP 06-096 – Mesa Grande/Vista Towers- Wireless facility (accessory use)	
3	MUP 06-036 – Santa Ysabel/Nextel- Wireless facility (accessory use)	
4	Santa Ysabel Vista Towers Wireless Facility- Wireless facility (accessory use)	
5	Site Plan 88-152 – Julian Pie Company in town center	
6	R 99-014 – Dudley's Bakery	
7	BA 99-0117 – Vedova- Boundary adjustment	
8	MUP 06-065 – Durbin Residence- Wireless facility (accessory use)	
9	AD 10-007 – Robinson 2 <sup>nd</sup> Dwelling Unit	Withdrawn
10	MUP 98-003-Spencer Winery-add'l winery bldg. - 19.86 acres. Expands agricultural operation, adds fruit stand	Scoped for noise, groundwater, and traffic. Impacts not significant. Negative Declaration 9/05/03
11	MUP 08-046 – Rutherford Peak Cell- Wireless facility (accessory use)	
12	MUP 06-054 – SS706 Farmers Road- Wireless facility (accessory use)	
13	MUP 98-011-Jenkins Winery-change roof style	
14	MUP 72-490-05 – Camp Cedar Glen- Replace existing old cabins and bldgs	
15	BA 00-0245 – Edwards/Thompson- Boundary adjustment	
16	TPM 20863-Hoskings Rch Rd., 3 lots on 150 ac.	Scoped for studies to biology, fire safety, agriculture, visual, archaeology. Idle status
17	ZAP 06-017 – ATC Julian West	Withdrawn
18	ZAP 05-023-01 – American Tower Corp.- Boundary adjustment	No Impacts, Exempt
19	ZAP 01-029 – SBA ZAP	Withdrawn
20	ZAP 00-032 – SBA ZAP	Withdrawn
21	MUP 06-016 – Verizon Witch Creek- Wireless facility (accessory use)	Scoped for visual, noise. No impacts.
22	ZAP 05-023 - Orinoco Creek- Wireless facility (accessory use)	
23	MUP 03-059 – Golden Chariot Towing- Located in Jacumba but appears on Julian map	Withdrawn
24	MUP 05-037 – Julian Radio Tower	Withdrawn
25	MUP 77-138-Julian Propane- screen storage yard 12.5 acres	No impact. Negative Declaration
26	MUP 77-113-Julian Sanitation Dist. 31 ac spray field	Impact: Agriculture- 2 ac. direct impact to FSI; Archaeology- No impact Biology- Oaks and riparian; Surface& Groundwater- runoff. Mitigation: Open space to protect oaks and riparian; 100' buffer around drainages. Surface runoff avoided. Approved 2/17/98
27	Site Plan 00-018-Straub	None. Notice of Exemption, 8/02/00
28	MUP 00-090-04 – AT&T Mobility LLC- Modification of existing cell tower	
29	ZAP 00-090 – SBA Julian- Wireless facility (accessory use)	Negative Declaration 8/02/00
30	ZAP 00-090-30 mod/dev – T-Mobile Monopine- Modification of existing cell tower	No impacts. Negative Declaration 4/02/01
31	ZAP 05-014-Austin 2 <sup>nd</sup> Dwelling- replaces home lost in Cedar Fire	No Impacts
32	ZAP 02-034 – Kenneth Gray	Withdrawn

Abbreviations: AD-Administrative Permit; B&B-Bed and Breakfast; BA-Boundary Adjustment; CDF-California Department of Forestry; DU-Dwelling Unit; FSI-Farmland of Statewide Importance; MUP-Major Use Permit; PF-Prime Farmland; R-Rezone; SFD-Single Family Dwelling; TM- Tentative Map; TPM-Tentative Parcel Map; ZAP-Minor Use Permit

**Table  
1-1**

## Cumulative Projects



33	ZAP 07-010-Sloan Star Oaks B&B- establish B&B in existing home	No impact
34	AD 99-022-Fisch	No impact
35	AD 09-021 – Seger 2 <sup>nd</sup> Dwelling Unit- Replace 2 <sup>nd</sup> dwelling lost in 2003 Cedar Fire	
36	TPM 19932-Ortega, 9.39 acres, 4 parcels	Impact: Agriculture- 3 ac. Direct impact to FSI; Biology- potential impacts to Velvet False-Lupine. Mitigation: Open space protection
37	BA 01-0042 – Daniels- Boundary adjustment	
38	MUP 75-083-YMCA Camp Marston- replace existing some existing facilities	Impact: Agriculture- 4 ac. Direct impact to PF. Approved 6/02/03
39	ZAP 08-002 – Pine Hills Water Co.	Withdrawn
40	MUP 68-084-Lakeside Presbyterian, MUP Modification	No impact
41	MUP 72-460- and -460-72 Girl Scout Camp. Winacka. MUP Modification	Impact: Archaeology. Mitigation: Open space
42	AD 10-016 – Sentire Partners- Administrative permit - agricultural clearing	
43	Site Plan 02-029-Behen SFD in Julian Estates	Impact: 20 oaks removed. Mitigation: Open space
44	AD 03-040 – Brown Family Trust- Administrative permit	
45	Site Plan 03-034-Brown Family Trust SFD and driveway	No impact
46	Site Plan 03-059-Rose Steadman SFD in Julian Estates	No impact
47	Site Plan 07-017-Edinger Family- SFD in Julian Estates	No impact. Addition of 5 trees to screen from park
48	Site Plan 01-028-Brown Residence. 4.3 acres in Julian Estates	No impact
49	Site Plan 01-049-Gallo Modification, 5.4 acres in Julian Estates	No impact
50	Site Plan 02-043-Ruffel & Morris- SFD in Julian Estates	No impact
51	Site Plan 02-045-Jones- SFD in Julian Estates	No impact
52	Site Plan 07-045-Wardle- SFD in Julian Estates	Withdrawn
53	Site Plan – Drewery Residence- Modification – minor deviation to add basement to existing residence	
54	TPM 20253-Sauter- 29 acres, 5 parcels	Impact: Biology- impacts 2.54 ac. Oak chaparral, 3.65 ac. Mixed montane chaparral. Mitigation: Open space over 17.48 ac.
55	Site Plan 10-004-Julian/Cuy. Fire Sta.	Impact: Agriculture- 2 ac. direct impact to FSI
56	AD 05-029 – Hallahan Barn- Oversize barn to replace original bldg lost in 2003 Cedar Fire	
57	MUP 01-023- Jess Martin Co. Park- in downtown area of Julian, 9600 sq ft.	No impact. Negative Declaration 1/09/02
58	Site Plan 07-032 – JCFPD Fire Station	Withdrawn
59	Site Plan 99-017- Mushet in downtown area of Julian- SFD, barn and living quarters	No impact
60	BA 02-0083 – Boundary Adjustment, Julian Union Sch. Dist.	No impact
61	MUP 90-034- Church in downtown area of Julian	
62	MUP 02-003 – Library in downtown area of Julian	No impact. Negative Declaration 3/06/02
63	Site Plan 01-053 – Duplex in downtown area of Julian	Notice of Exemption 1/24/02
64	Site Plan 03-015 – Leroux residence in downtown area of Julian	Studied for noise, cultural resources, drainage, and traffic. Mitigated with TIF
65	Site Plan 96-032-01- Campbell in downtown area of Julian	
66	ZAP 01-010- Leroux in downtown area of Julian	Noise study- no impact. Notice of Exemption 8/17/00

Abbreviations: AD-Administrative Permit; B&B-Bed and Breakfast; BA-Boundary Adjustment; CDF-California Department of Forestry; DU-Dwelling Unit; FSI-Farmland of Statewide Importance; MUP-Major Use Permit; PF-Prime Farmland; R-Rezone; SFD-Single Family Dwelling; TM- Tentative Map; TPM-Tentative Parcel Map; ZAP-Minor Use Permit

**Table  
1-1**

## Cumulative Projects



67	Site Plan 79-053 in downtown area of Julian	
68	ZAP 02-010 in downtown area of Julian, B&B, no construction	Notice of Exemption 7/23/02
69	ZAP 00-031 – Dawkins Gift Shop in downtown area of Julian	No impact. Approved 6/20/00
70	Site Plan 00-077- Eddington in downtown area of Julian	Notice of Exemption 3/28/01
71	ZAP 00-044 – Verizon in downtown area of Julian	No impact. Notice of Exemption 8/17/00
72	ZAP 92-005- JM Consulting in downtown area of Julian	No impact. Approved 6/15/00
73	MUP 72-469-Manley Minor Deviation- move site for house reconstruction to area burned/bulldozed by CDF	None
74	ZAP 00-58-02,03 – Nextel Banner- Wireless facility (accessory use modification)	Notice of Exemption 3/23/01
75	BA 00-0245 – Edwards/Thompson	No impact
76	MUP 06-046 – Banner/Nextel- Wireless facility (accessory use)	Biology study. No impact
77	ZAP 02-080 – Siem	Withdrawn
78	MUP 01-15 – Compass Telecom Hwy 79- Wireless facility (accessory use)	
79	Site Plan 03-046-NailZone Circular	No impact
80	Site Plan 02-041-Brown Family Trust	No impact
81	Site Plan 05-011-Page Residence- single family dwelling	No impact
82	MUP 85-078-Catholic Conf. Site. Modification- relocate cabin	No impact. Negative Declaration 8/27/01
83	MUP 06-097 – Sprint-Nextel Picacho- Wireless facility (accessory use)	
84	MUP 97-005-Red Horse Winery- winery & accessory bldgs- 28.32 acres	Mitigation: Open space to protect oak, conifers, archaeology. Negative Declaration 10/02/97 More recent application withdrawn
85	ZAP 01-102-Lundie 2 <sup>nd</sup> DU- above 2-car garage	No impact. Exempt under CEQA
86	BA 97-0069 – Wynn/Peterman/McVicker Eng.- Boundary adjustment	
87	TPM 20571-Learn Subdivision- 111 acres, 5 lots	Impact: Biology- impacts to 1.85 ac. Jeffrey Pine Forest, 15.57 ac. mixed Montane Chaparral, 0.8 ac. Symphoricarpos/Eriogonum. Mitigation: Open space over 40.38 ac. Negative Declaration 7/03/03
88	TPM 20474-Klucwewich Trust- 85.5 acres, 4 lots	Impact: 21.5 acres of Chaparral, 5.4 acres of Dry Montane Meadow, 9.1 acres of Mixed Oak Woodland, 0.3 acres of Open Water Habitat, Cultural Resources Mitigation: Open space easement to protect biology and archaeology. Mitigated Negative Declaration 7/03/03
89	MUP 82-081-Great Outdoor American Adv.	No impacts. Approved 12/20/90
90	TM 4489-Julian Estates- 41 lots	Impacts: traffic, community character, geology, biology, visual, grading. Mitigation: open space. Approved 9/06/85

Abbreviations: AD-Administrative Permit; B&B-Bed and Breakfast; BA-Boundary Adjustment; CDF-California Department of Forestry; DU-Dwelling Unit; FSI-Farmland of Statewide Importance; MUP-Major Use Permit; PF-Prime Farmland; R-Rezone; SFD-Single Family Dwelling; TM-Tentative Map; TPM-Tentative Parcel Map; ZAP-Minor Use Permit

**Table  
1-1**

## Cumulative Projects

## CHAPTER 2.0    **SIGNIFICANT ENVIRONMENTAL EFFECTS OF THE PROPOSED PROJECT**

### **2.1    Biology**

Biological surveys of the site were conducted by REC Consultants, Vincent Scheidt, and others during various periods from May 2002 through ~~May 2010~~ 2014. These surveys are included in the most recent study, "A Biological Resources Survey Report for the Hoskings Ranch Project, TM 5312 RPL<sup>3</sup>, and Consolidated Project Alternative Log No. 03-10-005 County of San Diego," revised ~~July 2013~~ June 2014, attached to this ~~DEIR~~ FEIR as Appendix A.

#### **2.1.1    Existing Conditions**

The topography of the 1,416.5-acre subject property slopes gently to steeply, dropping off from flatter areas near the north and east portions of the site to the lower elevations to the west and south. A number of dirt roads cross the property, with access currently provided from SR 78/79, Daley Flat Road, and Forest Service roads through Daley Flat. There are no residences on the site and the only structures present are capped wells, four man-made detention basins, fences, and a cattle loading corral. The lowest portions of the site have supported occasional agriculture (livestock grazing) in the past. The habitats onsite consists of chaparrals, scrubs, woodlands, herbaceous uplands, wetlands, and unvegetated habitats. Elevations onsite range from approximately 3,100 to 4,200 feet MSL. Soil types found onsite consist of sandy loams and alluvial soils.

There are seventeen generally discrete subcategories of plant communities found onsite. They are as follows: (1) Southern Mixed Chaparral, (2) Chamise Chaparral), (3) Diegan Coastal Sage Scrub, Inland Form, (4) Flat-top Buckwheat, (5) Coastal Sage – Chaparral Scrub, (6) Coast Live Oak Woodland, (7) Engelmann Oak Woodland, (8) Mixed Oak Woodland, (9) Mixed Oak/Coniferous/Bigcone/Coulter, (10) Non-native Grassland, (11) Montane Meadow, (12) Southern Coast Live Oak Riparian Forest, (13) Open Water, (14) Coastal and Valley Freshwater Marsh/Emergent Wetland, (15) Riparian Scrub, (16) Disturbed Wetland, and (17) Urban/Developed Habitat. Habitats which comprise the general 'Scrub' category (including many of the soft-woody species above) may also qualify as Sensitive Habitat Lands as defined by the RPO. For analysis purposes, all areas of Scrub onsite are classified as 'CSS' pursuant to the County's Habitat Loss Permit (HLP) Ordinance.

These biological resource areas are depicted on Figures 2-1-1A, B, and C, "Biological Resources Map – West," "Biological Resources Map – Central," and "Biological Resources Map – East," respectively, at the end of this chapter in 11x17 format, and in larger format in the back pocket of this ~~DEIR~~ FEIR. Existing open space easements have been mapped to show the biological resources currently under protection, as shown in Figure 2-1-2, "Existing Open Space Easements and Associated Biology."

The following subsection provides relevant data for the onsite habitats. Table 3 in the biological resources report summarizes the data for each of these habitats.

##### **2.1.1.1    Sensitive Habitats**

Sensitive Habitats on the site total approximately 1,416.5 acres and are discussed below. An additional 0.8 acres of urban/developed land occurs on the site but is not discussed here because it is not a sensitive habitat.

Southern Mixed Chaparral (117.5 acres) and Chamise Chaparral (96.9 acres)

Chaparral habitat composition varies greatly depending on factors such as slope and surface. Chaparral vegetation occurs in patches throughout the Project Site in the dry upland areas. Southern Mixed Chaparral is found in sheltered locations and on slope surfaces sustaining moderate amounts of moisture. Chamise Chaparral is found in areas characterized by small amounts of moisture and nutrient-poor slopes. Chaparral indicator species include Chamise, Whitebark Ceanothus, Mountain Mahogany, Mariposa Lily, Chaparral Bird's Beak, and other species. South-facing slopes support significantly more open chaparral with lower stature shrubs.

Diegan Coastal Sage Scrub, Inland Form (40.6 acres), Flat-top Buckwheat (71.4 acres), and Coastal Sage-Chaparral Scrub (38.3 acres)

Scrub vegetation is found in older disturbed areas that have regrown with various shrubs and subshrubs, including Flat-top Buckwheat, Slender Sunflower, and other soft-woody species. Diegan Coastal Sage Scrub is indicated by California Sagebrush, Flat-top Buckwheat, and other species. The site supports a nearly pure stand of Flat-top Buckwheat, with few other species in the area. Coastal Sage-Chaparral Scrub includes Chamise, Flat-top Buckwheat, and other native species. Most of the scrub habitats are found in areas that were also used by humans, including prehistoric uses around some of the site's larger rock outcrops.

Coast Live Oak Woodland (175.8 acres), Engelmann Oak Woodland (246 acres), Mixed Oak Woodland (115 acres), and Mixed Oak/Coniferous/Bigcone/Coulter (8.7 acres)

Woodlands occupy large areas of the Project Site. Coast Live Oak Woodland is indicated by mature Coast Live Oak trees over a mixed understory including Ripgut Brome, Western Goldrod, Squaw Bush, and many others. Engelmann Oak Woodland is indicated by mature and often large Engelmann Oaks over a similar understory. Broad savannahs of Engelmann Oak Woodland are found in various places onsite. Mixed Oak Woodland contains a variety of oaks, including Black Oaks and other native species. Mixed Oak/Coniferous/Bigcone/Coulter is indicated by oaks and various conifers, including Incense Cedar and Coulter Pine.

Non-native Grassland (375.8 acres) and Montane Meadow (76.3 acres)

Herbaceous upland vegetation covers most of the flatter areas on the property that were at one time grazing pastures. Non-native Grassland indicators include Ripgut Brome, Wild Oat, and Perennial Mustard. Montane Meadow indicators include Blessed Thistle, Rush, and other native species.

Southern Coast Live Oak Riparian Forest (49.53 acres), Riparian Scrub (3.2 acres), Open Water (0.07 acres), Coastal and Valley Freshwater Marsh/Emergent Wetland (0.85 acres), and Disturbed Wetland (0.07 acres)

Southern Coast Live Oak Riparian Forest is indicated by large trees including California Sycamores, willows, Cost Live Oak, and others along the site's main drainages. Riparian Scrub includes scrubby willows, cattails, and Mule Fat, and is found in openings along several of the site's drainages. Open Water is characterized by four agricultural ponds onsite, which were constructed for cattle watering. Only one or two hold water beyond the rainy season and have become well vegetated over time. These ponds support Emergent Wetland, Coastal and Valley Freshwater

Marsh, and Disturbed Wetland. A wetland delineation was done for the Proposed Project and the results are shown on Figure 2-1-3, "Wetland Delineation."

### 2.1.1.2 *Sensitive Plant and Animal Species*

The property was surveyed for special status plant species and animals. Special status plant species and animals are those listed as "rare, endangered, threatened, of special concern" or "otherwise noteworthy" by the California Department of Fish and Game, the U.S. Fish and Wildlife Service, the National Audubon Society, the County of San Diego's MSCP program, the California Native Plant Society, or other conservation agencies, organizations, or local botanists or zoologists. Of the 286 species of vascular plants observed, the following six are considered sensitive: San Diego Milk-vetch, Banner Dudleya, San Diego Gumplant, Cuyamaca Meadowfoam, Engelmann Oak, and Velvety False Lupine. Where applicable, CNDDDB forms for each of the observed special status plant species were completed and provided in attachment to the Biology report in Appendix A. One hundred and thirty-one species of animals were observed, with 27 species considered sensitive. These include: Grasshopper Sparrow, Golden Eagle, Great Blue Heron, Red-shouldered Hawk, Swainson's Hawk, Green Heron, Turkey Vulture, Northern Harrier, White-tailed Kite, California Horned Lark, Blue-gray Gnatcatcher, Western Bluebird, Bewick's Wren, Barn Owl, Mountain Lion, Bobcat, San Diego Desert Woodrat, Mule Deer, Silvery Legless Lizard, Southwestern Pond Turtle, Orange-throated Whiptail, San Diego Ringneck Snake, Two-striped Garter Snake, San Diego Horned Lizard, Coronado Skink, Coastal Western Whiptail, and Monarch butterfly.

### 2.1.1.3 *Threatened or Endangered Species*

#### California Gnatcatcher

The California Gnatcatcher is a federally-listed "threatened" songbird, and has been found on habitat superficially similar to that found on the Project Site. The California Gnatcatcher is a federally-listed "threatened" songbird, and has been found on habitat superficially similar to that found on the Project Site. However, the scrub habitat on the Proposed Project site is previously disturbed. Additionally, the California Gnatcatcher is usually found on sites with elevations below 1,800 feet MSL, and the Project Site ranges from 3,100 and 4,200 feet MSL. And lastly, there are no locality records for this species from the vicinity, with the nearest sighting several miles to the west at lower elevations. For these reasons, the California Gnatcatcher is not expected to occur on this property.

#### Laguna Mountains Skipper

The Laguna Mountains Skipper is oftentimes found in higher elevation areas of San Diego County. Since it is a federally-listed "endangered species," directed surveys were conducted in 2002 and 2008. The Laguna Skipper larva feeds solely on the *Horkelia clevelandii* plant, which makes the presence or absence of this plant the determining factor for the existence of the Laguna Skipper. The directed surveys of the site did not find any *Horkelia clevelandii*; therefore, the Laguna Mountains Skipper is not expected to occur on the Proposed Project site.

#### Stephen's Kangaroo Rat

Stephen's Kangaroo Rat is a State and Federally-listed "Threatened Species". This secretive, nocturnal mammal is known to occur in open habitats dominated by low forbs such as Red-stem Filaree (*Erodium cicutarium*) with scattered, low perennial



shrubs, including Flat-top Buckwheat (*Eriogonum fasciculatum*), California Sagebrush (*Artemisia californica*), and others. This species is known to be sensitive to "edge effects", and their survival is dependent on a habitat containing appropriate soil for burrowing, open spaces for foraging and breeding, and the appropriate mix of annual forbs to annual grasses. Field surveys in May 2014 concluded that SKR does not occur on the Proposed Project site.

#### **2.1.1.4 Regulatory Framework**

##### California Environmental Quality Act (CEQA)

California Public Resources Code, Section 21000, et seq., constitutes CEQA. This Act legislates environmental protections, encoding guidelines and definitions that guide agencies in directing projects to have the least environmental impacts.

##### California Endangered Species Act (CESA)

California Fish and Game code, Section 2050, et seq., constitutes CESA. This Act legislates the protection of endangered species, calling for conservation and mitigation programs, and providing definitions for various terms, including the term 'endangered' and/or 'threatened', which guide the Act's enforcement.

##### Code of Federal Regulations (CFR)

CFR Section 21, et seq., constitutes the Migratory Bird Treaty Act (MBTA), which provides protections for migratory birds. Specific provisions of the statute include:

"Establishment of a Federal prohibition, unless permitted by regulations, to "pursue, hunt, take, capture, kill, attempt to take, capture or kill, possess, offer for sale, sell, offer to purchase, purchase, deliver for shipment, ship, cause to be shipped, deliver for transportation, transport, cause to be transported, carry, or cause to be carried by any means whatever, receive for shipment, transportation or carriage, or export, at any time, or in any manner, any migratory bird, included in the terms of this Convention . . . for the protection of migratory birds . . . or any part, nest, or egg of any such bird." (16 U.S.C. 703)"

##### Federal Endangered Species Act (FESA)

Title 16 of the United States Code Section 1531, et seq., constitutes the Federal Endangered Species Act. FESA declares the U.S.'s concerns about endangered species, provides definitions for various terms, including the term 'endangered' and/or 'threatened', and directs the states to protect endangered species through conservation programs and the like. FESA Section 10(a)(2) provides for a Habitat Conservation Plan (HCP), which is a mandatory component of an incidental take permit for a project with no Federal nexus for a listed species, designed to minimize and mitigate the authorized take of the species. Section 7 of FESA provides for legal incidental take, or a take which is incidental to the pursuit of an otherwise legal activity. Section 7 also requires that all federal agencies consult with USFWS to insure that their actions are not likely to jeopardize the continued existence of Listed Species or result in destruction or adverse modification of critical habitat.

##### Natural Community Conservation Plan Act (NCCPA)

California Fish and Game Code Section 2400-2435 constitutes the NCCPA, which provides the mechanism for permitting the take of wildlife when conditions are met to the satisfaction of the agencies under an approved plan. The Permit issued in accordance with the implementing agreement allows the take of identified species,

including rare species, species listed under CESA as threatened or endangered, species that are candidates for listing, and unlisted species.

Pre-Approved Mitigation Area (PAMA) are a function of the NCCPA. These are lands that have been identified through an extensive computer modeling process and independent scientific review as being of high biological importance. PAMA lands are “pre-approved” as being suitable for conservation.

#### Resource Protection Ordinance (RPO)

San Diego County Ordinance No. 9842 constitutes the RPO, which lists provisions relative to wetlands, prehistoric and historic sites, agricultural operations, enforcement, and other matters.

### **2.1.2 Analysis of Project Effects and Determination as to Significance**

All plants, animals, and habitats encountered during survey periods were noted in the field. The limits of each habitat-type were mapped in the field utilizing an aerial photograph of the property. All plants and animals identified in association with the property are listed in Tables 8 and 9 of Appendix A. Wildlife observations were made opportunistically. Binoculars were used to aid in observations and all wildlife species detected were noted. Several directed field surveys and habitat evaluations were conducted in conjunction with the biological survey of the property, including an Arroyo Toad field survey, a Quino Checkerspot Butterfly survey, a wetland survey, habitat evaluations for various sensitive species known from the vicinity, and a spring rare plant survey (see Figure 2-1-4, “Rare Plant Survey”). Each survey complied with approved protocols to maximize detection of the respective biological resources, if present.

All potential Project-related effects were evaluated using the guidelines for significance. Potential offsite impacts that could arise from sight-distance requirements were reviewed. It appears that site-distance requirements can be met by trimming existing trees. This trimming can take place without harming the existing trees, and therefore no offsite impacts are associated.

The development area of the site, which includes all pads, roads, fire clearing, and other improvements, totals ~~206.9201.9~~ acres, or just under 15 percent of the site. The remainder of the site (~~1,209.81,214.8~~ acres, or just over 85 percent of the site) would be preserved in dedicated biological open space, a portion of which (approximately 880 acres) would allow grazing. The onsite open space consists entirely of open space; however all of this open space would be protected under a dedicated Biological Open Space or Conservation Easement to be managed in perpetuity. Additional protections for the open space are provided by a Resource Management Plan, provided in the biological resources report included as Appendix A, and a Conservation Grazing Management Plan (CGMP).

The open space is provided as mitigation for project impacts, as detailed below.

Certain areas of the site are considered ‘impact-neutral’. These are areas that are avoided by ordinance, and therefore cannot be used to offset Proposed Project impacts. These ‘impact neutral’ areas are potentially subject to edge effects, although the low-density design of the Proposed Project, and the management of the open space through the CGMP would minimize these effects.

~~The 5-acre portion of the property proposed for dedication to the fire department is included in the ‘impact neutral’ category; any future development of this property would be subject to subsequent environmental review.~~

The Proposed Project also includes an existing 1.6-acre road easement to be realigned within Lot 10. No action to design or permit any facility or related improvements is being undertaken as part of the current application, although potential future impacts, assuming full site development, are evaluated in the biological analysis.

Guidelines for significance were determined using appropriate provisions of the San Diego County Guidelines for Determining Significance and Report Format: Biological Resources. In addition, County of San Diego staff provided further consultation in the formulation of guidelines.

#### **2.1.2.1 Special Status Species**

##### Guidelines for the Determination of Significance

A significant impact to biological resources would occur if:

1. The Proposed Project would impact one or more individuals of a species listed as federally or state endangered or threatened.
2. The Proposed Project would impact the regional long-term survival of a County Group A or B plant species, or a County Group I animal species, or a species listed as a state Species of Special Concern.
3. The Proposed Project would impact the regional long-term survival of a County Group C or D plant species or a County Group II animal species.
4. The Proposed Project may impact Arroyo Toad aestivation or breeding habitat.
5. The Proposed Project would impact Golden Eagle habitat.
6. The Proposed Project would result in a loss of functional foraging habitat for raptors.
7. The Proposed Project would increase noise and/or nighttime lighting to a level above ambient proven to adversely affect sensitive species.
8. The Proposed 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.
9. The Proposed Project would increase human access or predation or competition from domestic animals, pests or exotic species to levels that would adversely affect sensitive species.
10. The Proposed Project would impact nesting success of sensitive animals through grading, clearing, modification, and/or noise generating activities such as construction.

##### Analysis

The Proposed Project would result in direct and indirect impacts to special status species that are less than significant pursuant to the above significance guidelines.

*Guideline 1: The project would impact one or more individuals of a species listed as federally or state endangered or threatened.*

The Proposed Project would indirectly impact Swainson's Hawk, a state-listed Threatened Species, and Cuyamaca Meadowfoam, a state-listed Endangered Species. Indirect impacts to Swainson's Hawk would include impacts to foraging habitat for this species. However, at least 90 percent of this species' habitat would be preserved onsite. The entire onsite population of Cuyamaca Meadowfoam would be protected in open space. However, in the absence of protective measures, the onsite population of Cuyamaca Meadowfoam could be impacted by edge effects. Guideline 1 is exceeded, impacts are significant. Mitigation is required. **(Impact BI-1)**

*Guideline 2: The project would impact the regional long-term survival of a County Group A or B plant species, or a County Group I animal species, or a species listed as a state Species of Special Concern.*

The Proposed Project would directly impact San Diego Gumplant, Two-striped Garter Snake, and Large-blotched Salamander, all of which are County Group A or B plant species, County Group I animal species, or state Species of Special Concern. However, these impacts would not affect the long-term regional survival of any of these species because ample habitat that supports these species is preserved on site and in the region. At least 85 percent of the Gumplant's habitat, 99 percent of the Garter Snake's habitat, and at least 85 percent of the Large-blotched Salamander habitat would be preserved onsite. Section 3.1.B of the biology report provides additional details.

Although the Proposed Project would indirectly impact Velvety False Lupine, 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, all of which are County Group A or B plant species, County Group I animal species, or state Species of Special Concern, these impacts are relatively minor in consideration of the amount of habitats supporting these species that would be preserved. Eighty-five percent and higher of these supporting habitats would be retained in permanent open space by the Proposed Project.

These direct and indirect impacts 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. Either the entire populations, or a vast majority of those populations, of the habitats supporting these species would be preserved onsite. Section 3.1.B of the biology report provides additional details.

Because the Proposed Project would result in direct and indirect impacts, Guideline 2 is exceeded and impacts are significant. Mitigation is required **(Impact BI-2)**.

*Guideline 3: The project would impact the regional long-term survival of a County Group C or D plant species or a County Group II animal species.*

The Proposed Project would directly impact Banner Dudleya, Engelmann Oak, San Diego Desert Woodrat, Silvery Legless Lizard, Orange-throated Whiptail, San Diego Ringneck Snake, Coronado Skink, San Diego Horned Lizard, Coastal Western Whiptail, Coastal Rosy Boa, San Diego Mountain Kingsnake, and Northern Red Diamond Rattlesnake, all of which are County Group C or D plant species or County Group II animal species. However, these impacts 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. The analysis determined that 81 percent of the onsite Engelmann Oak population, and 95 percent of the Banner



Dudleya population would be preserved onsite. For all the remaining species listed, at least 90 percent of each population and the associated habitats would be preserved. Section 3.1.C, page 55, of the biology report provides additional details.

The Proposed Project would indirectly impact Great Blue Heron, Green Heron, [California](#) Horned Lark, Western Bluebird, Barn Owl, Mountain Lion, Mule Deer, and Monarch Butterfly, all of which are County Group C or D plant species or County Group II animal species. The analysis determined that at least 83 percent of each population and the associated habitats would be preserved. Section 3.1.C, page 55, of the biology report provides additional details.

These direct and indirect impacts 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. The analysis has determined that the majority of the habitat supporting each of the listed species would be preserved. Section 3.1.C, page 56, of the biology report provides additional details.

Because the Proposed Project would result in direct and indirect impacts, Guideline 3 is exceeded and impacts are significant. Mitigation is required (**Impact BI-3**).

*Guideline 4: The project may impact Arroyo Toad aestivation or breeding habitat.*

Arroyo Toad aestivation or breeding habitat is not found on this site. Therefore the guideline does not apply.

*Guideline 5: The project would impact Golden Eagle habitat.*

The Proposed Project could directly impact Golden Eagle foraging habitat because it would result in the loss and habitat fragmentation of [206.9201.9](#) acres of golden eagle foraging habitat. Golden Eagle nesting habitat is not present onsite.

This wide-ranging species is known to forage onsite and nest in the Cleveland National Forest.

CEQA requires the assumption that birds could nest in any of the development area, and therefore all [206.9201.9](#) acres in the development area are considered potential avian nesting areas. This includes shrub, tree, and ground nesting species. The reader is referred to Table 2-1-1, "Biological Impact Table," for the listing of all habitat impacts, mitigation ratios required for each habitat, and mitigation acreage provided in open space protection by the Proposed Project.

Golden Eagle is declining in San Diego County and is highly sensitive to human activity. On-going management is required to protect foraging activities on an on-going basis. Guideline 5 is exceeded and impacts are significant. Mitigation is required. (**Impact BI-4**)

*Guideline 6: The project would result in a loss of functional foraging habitat for raptors.*

Raptor foraging habitat is generally located in upland grassland areas. The Proposed Project would result in the loss of up to [206.9201.9](#) acres of potential foraging habitat due to direct impacts from development for the site's resident and potentially-resident raptor species, including Golden Eagle, Swainson's Hawk, Red-shouldered Hawk, and White-tailed Kite.

CEQA requires the assumption that birds could nest in any of the development area, and therefore all [206.9201.9](#) acres in the development area are considered potential avian nesting areas. This includes shrub, tree, and ground nesting species. The

reader is referred to Table 2-1-1 for the listing of all habitat impacts, mitigation ratios required for each habitat, and mitigation acreage provided in open space protection by the Proposed Project.

The loss of [206.9201.9](#) acres of potential foraging habitat is significant. Guideline 6 is exceeded and impacts are significant. Mitigation is required (**Impact BI-5**).

*Guideline 7: The project would increase noise and/or nighttime lighting to a level above ambient proven to adversely affect sensitive species.*

The Proposed Project would not increase noise and/or nighttime lighting to a level that has been proven to adversely affect sensitive species because Project density is very low (0.02 dwelling units per acre). Minimum lot size is 40 acres, so noise or lighting effects would be dispersed. Additionally, the Proposed Project would conform to the Dark Sky Ordinance. Guideline 7 is not exceeded and impacts are not significant. No mitigation is required.

*Guideline 8: 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 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. 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 [1,209.81,214.8](#) acres of managed biological open space easements. County guideline 3.1.A states that "alteration of any portion of a core habitat could only be considered less than significant if a biologically-based determination can be made that the project would not have a substantially adverse effect on the core area and the species it supports". Because the 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.

*Guideline 9: The project would increase human access or predation or competition from domestic animals, pests or exotic species to levels that would adversely affect sensitive species.*

The Proposed Project would increase human access or predation or competition from domestic animals, pests or exotic species to levels that would adversely affect special status species. Open space is protected with easements, fencing and/or signage, as needed. Ongoing management is needed, however, to ensure protections are provided in perpetuity. Guideline 9 is exceeded and impacts are significant. Mitigation is required. (**Impact BI-6**)

*Guideline 10: The project would impact nesting success of sensitive animals through future grading, clearing, modification, and/or noise generating activities, such as construction.*

The conversion of [206.9201.9](#) acres of the site that are currently in a natural, mostly undisturbed state to a development which includes homes and agriculture would impact the nesting success of the special status species present on the site.

The reader is referred to Table 2-1-1 for the listing of all habitat impacts, mitigation ratios required for each habitat, and mitigation acreage provided in open space protection by the Proposed Project.

Guideline 10 is exceeded and impacts are significant. Mitigation is required. (**Impact BI-7**)

### **2.1.2.2 Riparian Habitats (Including State and County Wetlands and “Waters”) or Sensitive Natural Community**

#### Guidelines for the Determination of Significance

The determination of impact significance is based on the following guidelines:

1. Project-related construction, grading, clearing, or other activities would temporarily or permanently remove sensitive native or naturalized habitat on or off the Project Site.
2. Any of the following would occur to or within jurisdictional wetlands and/or riparian habitats as defined by the State, CRWQCB and CDFW, or the County of San Diego RPO: removal of vegetation; grading; obstruction or diversion of water flow; adverse change in velocity, siltation, volume of flow; obstruction or diversion of water flow; adverse change in velocity, siltation, volume of flow, or runoff rate; placement of fill; placement of structures; construction of a road crossing; placement of culverts or other underground piping; any disturbance of the substratum; and/or any activity that may cause an adverse change in native species composition, diversity and abundance.
3. The project would draw down the groundwater table to the detriment of groundwater-dependent habitat, typically a drop of 3 feet or more from historical low groundwater levels.
4. The project would increase human access or competition from domestic animals, pest or exotic species to levels proven to adversely affect sensitive habitats.
5. The project does not include a wetland buffer adequate to protect the functions and values of existing wetlands.

#### Analysis

The Proposed Project is projected to cause direct impacts and indirect long-term impacts to riparian habitats or other sensitive natural communities under the stated guidelines.

*Guideline 1: Project-related construction, grading, clearing, construction or other activities would temporarily or permanently remove sensitive native or naturalized habitat on or off the project site.*

Project-related future construction, grading, clearing, or other activities would permanently remove sensitive native or naturalized habitat on the Proposed Project Site. The Proposed Project preserves large blocks of habitat in order to preserve wildlife corridors along many of the site's drainages, and all of the regional wildlife corridor along Orinoco/Temescal Canyon Creek and the southern portions of the site. The Proposed Project would not create artificial wildlife corridors that do not follow natural movement patterns.

Direct onsite impacts include 12.6 acres of Southern Mixed Chaparral which requires 6.3 acres for mitigation at a ratio of 0.5:1; 0.8 acres of Chamise Chaparral which requires 0.4 acres for mitigation at a ratio of 0.5:1; 3.8 acres of Diegan Coastal Sage Scrub, Inland Form which requires 7.6 acres for mitigation at a ratio of 2:1, 12.8 acres of Flat-top Buckwheat which requires 25.6 acres for mitigation at a ratio of 2:1; 4.6 acres of Coast Live Oak Woodland which requires 13.8 acres for mitigation at a ratio of 3:1; 43.7 acres and 2.2 acres from open space easement vacation of Engelmann Oak Woodland, which requires 144.3 acres total for mitigation at ratios of 3:1 and 6:1 for the two respective impact types; 15.3 acres of Mixed Oak Woodland which requires 45.9 acres for mitigation at a ratio of 3:1; 0.8 acre of Mixed Oak/Coniferous/Bigcone/Coulter which requires 2.4 acres for mitigation at a ratio of 3:1; 101.5 acres from Project development and 1.3 acres from open space easement vacation of Non-native Grassland which requires a total of 52.1 acres for mitigation at ratios of 0.5:1 and 1:1 for the two respective impact types; 7.3 acres of Montane Meadow which requires 21.9 acres for mitigation at a ratio of 3:1; and 0.25 acre of Riparian Scrub which requires 0.75 acre for mitigation at a ratio of 3:1. All mitigation is provided onsite within the open space provided, with the exception of the Riparian Scrub, which may be mitigated either through onsite mitigation as described in section 2.1.5, or through the purchase of credits at an approved offsite mitigation bank.

Guideline 1 is exceeded and impacts are significant. Mitigation is required. **(Impact BI-8)**

*Guideline 2: Any of the following would occur to or within jurisdictional wetlands and/or riparian habitats as defined by ACOE, CDFG and the County of San Diego: removal of vegetation; grading; obstruction or diversion of water flow; adverse change in velocity, siltation, volume of flow; obstruction or diversion of water flow; adverse change in velocity, siltation, volume of flow, or runoff rate; placement of fill; placement of structures; construction of a road crossing; placement of culverts or other underground piping; any disturbance of the substratum; and/or any activity that may cause an adverse change in native species composition, diversity and abundance.*

Project-related future construction, grading, clearing, or other activities would result in impacts to jurisdictional wetlands and/or riparian habitats, as defined by CRWQCB, CDFW, and/or the County of San Diego RPO. This would 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, and Riparian Scrub, would be impacted by the Proposed Project qualify as jurisdictional wetland and/or riparian habitats. Although most of the site's jurisdictional wetlands and riparian habitats would be protected in biological open space, certain relatively minor impacts to these features, as listed here, are unavoidable: impacts to a total of 101.5 acres of Non-native Grassland require 52.1 acres for mitigation at a ratio of 0.5:1 for project impacts, and 1:1 for an area impacted within an open space easement vacation; impacts to 7.3 acres of Montane Meadow require 21.9 acres for mitigation at a ratio of 3:1; and impact to 0.25 acres of Riparian Scrub requires 0.75 acre for mitigation at a ratio of 3:1.



Guideline 2 is exceeded and impacts are significant. Mitigation is required. **(Impact BI-9)**

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

Groundwater-dependent plant species onsite are limited to large, deep-rooted California Sycamores, Western Cottonwoods, and possibly very large willows. These trees in general are considered phreatophytic, having deep-penetrating roots which can tap into groundwater or just above the groundwater level, but are considered to be dependent on groundwater levels for long-term survival only under extreme conditions. The trees onsite are found only in association with drainages. Having a reliable water source, these onsite trees are therefore considered not likely to use groundwater except under extreme conditions. The potential phreatophytes are rare onsite, and most are small and likely not dependent on groundwater. Furthermore, none of the identified well sites in the site's groundwater report are located within 1,000 feet of any potential phreatophytes.

Although it is also found in Southern Coast Live Oak Riparian Forest, Coast Live Oak is considered an upland species on this site. The remaining wetland habitats onsite (Riparian Scrub, Open Water, Coastal and Valley Freshwater Marsh/Emergent Wetland, Disturbed Wetland, and 'wet' Montane Meadow) depend on persistent surface water flows, saturated surface soils, and/or elevated water tables, not groundwater. The plant species associated with these habitats have relatively shallow root systems and are not considered phreatophytes.

Being that the onsite habitats are not anticipated to be groundwater-dependent, the Proposed Project is not anticipated to draw down the groundwater table to the detriment of any groundwater-dependent habitat. Guideline 3 is not exceeded and impacts are not significant. No mitigation is required.

*Guideline 4: The project could increase human access or competition from domestic animals, pests or exotic species to levels proven to adversely affect sensitive habitats.*

The Proposed Project would increase human access or competition from domestic animals by locating 24 residences on the site and allowing limited cattle grazing/breeding. In additions, pests or exotic species associated with these activities could occur. The steep topography would protect some areas and the low development density (1 DU/40 acres) would discourage some incursion into sensitive areas. Cattle grazing density would also be kept low. However, the possibility persists that human access could negatively impact sensitive habitats because some proposed residences are near sensitive habitats. Guideline 4 is exceeded and impacts are significant. Mitigation is required. **(Impact BI-10)**

*Guideline 5: The project does not include a wetland buffer adequate to protect the functions and values of existing wetlands.*

The Proposed Project incorporates wetland buffers that extend at least 50 feet from the outer edge of all RPO wetlands, except in the locations of the necessary road crossings. No buffer is less than 50 feet and the encroachments occur in areas where buffers have been extended to 200 feet due to the presence of oaks, as required by the County guidelines for biology. The encroachments are limited to approximately 50 feet in three isolated areas: lots 6, 7, and 9 due to the main Project

access; lot 8 for the driveway to that lot. The encroachments do not affect the function and value of existing wetland because a minimum of 150 feet buffer is present in all cases. The site's constraints necessitated these encroachments. Constraints include steep slopes and arroyos along the main entrance, extensive wetlands that run in a north/south direction along most of the eastern boundary, and extensive cultural resources in the eastern part of the site that must be avoided. Additionally, RPO wetlands and buffers would be protected from future fire clearing through the dedication of minimum 100-foot Limited Building Zones (LBZs). Guideline 5 is not exceeded and impacts are not significant. No mitigation is required.

In summary, the Proposed Project has both direct and indirect significant impacts to sensitive habitats. These habitats would be protected in open space easements that would effectively mitigate impacts to sensitive habitats to a level less than significant.

### **2.1.2.3 Federal Jurisdictional Wetlands and Waterways**

#### **Guidelines for the Determination of Significance**

Impacts to Federal Jurisdictional Wetlands and Waterways ("waters") associated with the Proposed Project are assessed as being either "significant" or "less than significant," as defined by CEQA. The determination of impact significance is based on the following guidelines:

1. Any of the following would occur to or within federal jurisdictional wetlands and/or waters as defined by ACOE: removal of vegetation; grading; obstruction or diversion of water flow; adverse change in velocity, siltation, volume of flow, or runoff rate; placement of fill; placement of structures; construction of road crossings; placement of culverts or other underground piping; any disturbance of the substratum; and/or any activity that may cause an adverse change in native species composition, diversity and abundance.
2. The project would draw down the groundwater table to the detriment of groundwater-dependent habitat, typically a drop of three feet or more from historical low groundwater levels.
3. The project does not include a wetland buffer adequate to protect the functions and values of existing wetlands.

#### **Analysis**

*Guideline 1: Any of the following would occur to or within federal jurisdictional wetlands and/or waters as defined by ACOE: removal of vegetation; grading; obstruction or diversion of water flow; adverse change in velocity, siltation, volume of flow, or runoff rate; placement of fill; placement of structures; construction of road crossings; placement of culverts or other underground piping; any disturbance of the substratum; and/or any activity that may cause an adverse change in native species composition, diversity and abundance.*

Project-related future construction, grading, clearing, or other activities would result in impacts to Federal Jurisdictional Wetlands and Waterways, as defined by ACOE. This would 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 would directly

impact 0.14 acres of Federal Jurisdictional Wetlands and Waterways. Although most of the site's federal jurisdictional wetlands would be protected in open space, impacts to these features are unavoidable. Guideline 2 is exceeded and impacts are significant. Mitigation is required. (**Impact BI-11**)

*Guideline 2: The project would draw down the groundwater table to the detriment of groundwater-dependent habitat, typically a drop of three feet or more from historical low groundwater levels.*

Groundwater-dependent plant species onsite are limited to large, deep-rooted California Sycamores, Western Cottonwoods, and possibly very large willows. These are associated with drainages, primarily, so it is likely that they are not actually using groundwater, but have the potential to do so in extreme conditions. The Proposed Project would not draw down the groundwater table to the detriment of groundwater-dependent habitat; hydrological tests have demonstrated adequate recovery rates in local wells. Guideline 2 is not exceeded and impacts are not significant. No mitigation is required.

*Guideline 3: The project does not include a wetland buffer adequate to protect the functions and values of existing wetlands.*

The Proposed Project includes wetland buffers that are adequate to protect the functions and values of existing federal wetlands. To that end, the project has been designed to incorporate wetland buffers that extend at least 50 feet from the outer edge of all federal wetlands, except in the locations of the necessary road or driveway crossings. Federal wetlands and buffers would be protected from future fire clearing through the dedication of minimum 100-foot LBZs. Guideline 3 is not exceeded and impacts are not significant.

#### **2.1.2.4 Wildlife Movement and Nursery Sites**

##### Guidelines for the Determination of Significance

Impacts to Wildlife Movement and Nursery Sites associated with the Proposed Project are assessed as being either "significant" or "less than significant," as defined by CEQA. The determination of impact significance is based on the following guidelines:

1. The project would prevent wildlife access to foraging habitat, breeding habitat, water sources, or other areas necessary for their reproduction.
2. The project would substantially interfere with connectivity between blocks of habitat, or would potentially block or substantially interfere with a local or regional wildlife corridor or linkage.
3. The project would create artificial wildlife corridors that do not follow natural movement patterns.
4. The project would increase noise and/or nighttime lighting in a wildlife corridor or linkage to levels proven to affect the behavior of the animals identified in a site specific analysis of wildlife movement.
5. The project does not maintain an adequate width for an existing wildlife corridor or linkage and/or would further constrain an already narrow corridor through activities such as (but not limited to) reduction of corridor width, removal of available vegetative cover, placement of incompatible uses adjacent to it, and placement of barriers in the movement path.

6. The project does not maintain adequate visual continuity (i.e., long lines-of-sight) within wildlife corridors or linkage.

### Analysis

The Proposed Project is projected to cause one direct impact to wildlife movements and nursery sites under the stated guidelines as discussed below.

*Guideline 1: The project would prevent wildlife access to foraging habitat, breeding habitat, water sources, or other areas necessary for their reproduction.*

The project would potentially constrain wildlife access to foraging habitat, breeding habitat, water sources, or other areas necessary for their reproduction in some areas, although ~~most~~ most areas onsite that are used by wildlife would be protected in 4,209.81,214.8 acres of open space. The Proposed Project preserves those portions of the site that are most valuable to wildlife, including the majority of riparian areas, the local wildlife corridors along many of the site's drainages, and all of the regional wildlife corridor along Orinoco/Temescal Canyon Creek and the southern portions of the site. The Proposed Project provides minimum 50-foot biological buffers along many of the drainages that serve as wildlife movement areas, water sources, or nursery sites. Furthermore, wildlife is known to move through agricultural areas and across roads, so these components of the proposed development would not create a barrier to wildlife movement. Guideline 1 is not exceeded and impacts are less than significant. No mitigation is proposed.

*Guideline 2: The project would substantially interfere with connectivity between blocks of habitat, or would potentially block or substantially interfere with a local or regional wildlife corridor or linkage.*

The project would interfere with connectivity between blocks of habitat in some areas through the construction of roads, driveways, homes, fences and other structures onsite, and the conversion of areas of the site to agriculture, landscaping, and development. This would constrain connectivity between blocks of habitat to a degree. However, the project has been designed to minimize interference with habitat connectivity and wildlife corridors and ensure the ongoing integrity of the open space. Although the County Biology Guidelines do not specifically define "blocks of habitat" (other than core wildlife areas), these are interpreted to be areas of natural vegetation in excess of 50 acres, which is the County's maximum acreage not normally requiring management. The determination that impacts to habitat block connectivity are less than significant is based on design modifications adopted as mitigation for this and other biology impacts. To that end, the project as designed preserves the largest and most contiguous habitat blocks on the southern portions of the site, including at least 99 percent of the riparian areas, large blocks of habitat along many of the site's drainages, and all of the regional wildlife corridor along Temescal Canyon Creek and the southern portions of the site, as well as blocks of habitat on the western and northern edges of the site. Lots are a minimum of 40 acres in size. Guideline 2 has not been exceeded, impacts are less than significant, and no mitigation is required.



*Guideline 3: The project would create artificial wildlife corridors that do not follow natural movement patterns.*

The Proposed Project preserves large blocks of habitat, including the site's natural wildlife corridors that follow natural movement patterns. This design does not feature any 'islands' or 'fingers' of open space that would otherwise create gaps and unnatural barriers to the genetic dispersal and movement of plants and animals. Therefore, the Proposed Project would not create artificial wildlife corridors that do not follow natural movement patterns. Guideline 3 is not exceeded and impacts are not significant. No mitigation is proposed.

*Guideline 4: The project would increase noise and/or nighttime lighting in a wildlife corridor or linkage to levels proven to affect the behavior of the animals identified in a site specific analysis of wildlife movement.*

The Proposed Project would not increase noise and/or nighttime lighting in a wildlife corridor, linkage, or nursery to levels proven to affect the behavior of the animals identified in a site-specific analysis of wildlife movement. At least 90 percent of the site's wildlife corridors and linkages would be preserved in dedicated open space. The open space would be protected from any activities that could impact the biological resources within the open space. Residences are generally separate from corridor areas. The Proposed Project proposes low density residential uses and grazing on large lots. As such, the Proposed Project would not introduce any noise and/or nighttime lighting at levels that would affect the behavior of any of the animals identified during the analysis. The Proposed Project would comply with the Dark Sky ordinance. Guideline 4 is not exceeded and impacts are not significant. No mitigation would be required.

*Guideline 5: The project does not maintain an adequate width for an existing wildlife corridor or linkage and/or would further constrain an already narrow corridor through activities such as (but not limited to) reduction of corridor width, removal of available vegetative cover, placement of incompatible uses adjacent to it, and placement of barriers in the movement path.*

The Proposed Project places [4,209.81,214.8](#) acres into open space, all of which is linked and fully supports wildlife movement. The open space is provided in large blocks with widths that are adequate for supporting existing wildlife movement. In particular, a large block of habitat in the southern portions of the site is preserved, maintaining the width of the regional wildlife corridor associated with Orinoco/Temesca Canyon Creek. No areas of the open space are narrow, no removal of vegetative cover would take place within the open space, no incompatible uses would be placed adjacent to the open space, and no barriers to the movement path would be created. Guideline 5 is not exceeded, and impacts are not significant. No mitigation is necessary.

*Guideline 6: The project does not maintain adequate visual continuity (i.e., long lines-of-sight) within wildlife corridors or linkage.*

The vastness of the Proposed Project's [4,209.81,214.8](#) acres of open space preserves the majority of the site's wildlife corridors and linkages. The open space would be protected from any activities that could impact the visual continuity within the corridors and linkages by prohibiting activities such as construction, placement of structures, clearing, and brushing. Guideline 6 is not exceeded, and no mitigation is required.

### **2.1.2.5 Local Policies, Ordinances, Adopted Plans**

#### Guidelines for the Determination of Significance

The determination of impact significance is based on the following guidelines:

1. For lands outside of the MSCP, the project would impact coastal sage scrub (CSS) vegetation in excess of the County's five percent habitat loss threshold as defined by the Southern California Coastal Sage Scrub Natural Community Conservation Planning Process (NCCP) Guidelines.
2. The project would preclude or prevent the preparation of the subregional Natural Communities Conservation Planning Process (NCCP). For example, the project proposes development within areas that have been identified by the County or resource agencies as critical to future habitat preserves.
3. The project would impact any amount of sensitive habitat lands as outlined in the Resource Protection Ordinance (RPO).
4. The project would not minimize and/or mitigate coastal sage scrub habitat loss in accordance with Section 4.3 of the Natural Communities Conservation Planning Process (NCCP) Guidelines.
5. The project does not conform to the goals and requirements as outlined in any applicable Habitat Conservation Plan (HCP), Habitat Management Plan (HMP), Special Area Management Plan (SAMP), Watershed Plan, or similar regional planning effort.
6. The project would preclude connectivity between areas of high habitat values, as defined by the Southern California Coastal Sage Scrub Natural Communities Conservation Planning Process (NCCP) Guidelines.
7. The project would reduce the likelihood of survival and recovery of listed species in the wild.
8. The project would result in the killing of migratory birds or destruction of active migratory bird nests and/or eggs (Migratory Bird Treaty Act).
9. The project would result in the take of eagles, eagle eggs or any part of an eagle (Bald and Golden Eagle Protection Act).

#### Analysis

The Proposed Project is projected to cause direct impacts to Local Policies, Ordinances, and Adopted Plans under the stated guidelines.

*Guideline 1: For lands outside of the MSCP, the project would impact coastal sage scrub (CSS) vegetation in excess of the County's 5% habitat loss threshold as defined by the Southern California Coastal Sage Scrub Natural Community Conservation Planning Process (NCCP) Guidelines.*

The project site is located outside of the MSCP and would impact 16.6 acres of CSS. This would not exceed the County's authorized five percent loss of 2,953.3 acres for this portion of the County. It is the County's policy that any "take" of CSS less than the authorized 2,953.3 acres (five percent loss), is a less than significant impact. Based on this policy, the Project's impacts to CSS as they relate to Local Policies, Ordinances, and Adopted Plans are therefore less than significant. Guideline 1 is not exceeded, impacts are less than significant, and no mitigation is required.

*Guideline 2: The project would preclude or prevent the preparation of the subregional Natural Communities Conservation Planning Process (NCCP). For example, the project proposes development within areas that have been identified by the County or resource agencies as critical to future habitat preserves.*

The Proposed Project is located in a draft proposed Focused Conservation Area (FCA) of the draft East County Subarea MSCP Plan, meaning that the site is important to future regional preserve design. This is because the project would likely be designated as a Pre-Approved Mitigation Area (PAMA) in the draft East County plan. PAMA lands are those that have been identified through an extensive computer modeling process and independent scientific review as being of high biological importance. PAMA lands are “pre-approved” as being suitable for conservation. Furthermore, the site is located partially within and adjoining Cleveland National Forest lands. Although impacts occur, these are less than significant because the Proposed Project preserves 85 percent of the property in managed open space. Guideline 2 is not exceeded, impacts are less than significant, and no mitigation is required.

*Guideline 3: The project would impact any amount of sensitive habitat lands as outlined in the Resource Protection Ordinance (RPO).*

Please refer to Figure 2-1-6, “Proposed Project – RPO Encroachments”, which shows the Proposed Project’s impact locations indexed by number.

Point 1: This is the location of the main project entry road at Lot 7. An RPO wetland is impacted by the crossing. Impacts amount to approximately 0.06 acres. Previously the entry was farther north and crossed two channels. Impacts have been minimized by moving the entry to a point where the wetland converges into a single channel. The current design represents the environmentally superior option because it is consistent with the County’s requirements for RPO crossings:

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

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

(cc) The crossing proposed is located and designed in such a way as to cause the least impact to environmental resources because it has been placed at a point where the RPO wetland narrows and where grading can be minimized. The crossing would span the creek, which would protect the majority of the creek bed from permanent disturbance.

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

(ee) The applicant has analyzed the possibilities for the crossing to serve adjoining properties. Properties east of the site could utilize the crossing as an

escape route in the event of an emergency. Properties offsite to the northwest of the project boundary also would be able to utilize the crossing in the event of an emergency.

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

Point 2: This is the driveway entry to Lot 8. Part of a 200 foot RPO wetland buffer is impacted by the crossing. It is not feasible to avoid the impact because other sensitive resources would be impacted if the driveway were moved north. One crossing is the minimum number feasible for this lot. The crossing was designed to minimize impact by using the minimum width allowed by fire officials: 24 feet of pavement on a 28 foot graded surface. The buffer width is reduced to 100 feet for approximately 60 feet before widening back to 200 feet. While the crossing is not currently proposed to serve adjoining properties, the design does not preclude future access by adjoining properties. Therefore, the design meets all of the criteria for RPO crossings.

Point 3: The main project entry road impacts the 50 foot wetland buffer associated with an RPO wetland north of the road at Lot 6. No wetland is directly impacted. A detention basin previously proposed in the wetland and wetland buffer has been moved, eliminating direct wetland impacts. The convergence of several resources in the area creates a design challenge. To the south, a Coast Live Oak buffer would be impacted by any relocation of the road to the southward. Also in the area to the south, steep slopes related to a gully create a design challenge; therefore, it is not feasible to avoid RPO buffer. Crossings are limited to the minimum number feasible because this is the main road through the project. The current project design represents the least impactful solution for the crossing. Therefore, the design meets all of the criteria for RPO crossings.

Point 4: This is where the main project entry road impacts approximately 0.03 acres of wetland that is located south of the road at Lot 9. The road alignment has been designed to minimize the impact, but some impacts are nonetheless unavoidable due to the presence of a steep hillside of rock-outcroppings in this area which also contains other sensitive resources that should be avoided. Any redesign further to the north would require blasting into the hillside, and may impact other sensitive resources. Therefore, the design of the road in this location has been optimized to avoid impacts. Crossings are limited to the minimum number feasible because this is the one main road through the project. Therefore, this crossing meets all of the criteria for RPO crossings.

Additional details about these crossings are provided in Section 4.4 of the biological resources report.

The Proposed Project would impact a measurable amount of sensitive habitat lands as outlined in the RPO. That is, the Proposed Project would directly impact 12.6 acres of Southern Mixed Chaparral which requires 6.3 acres for mitigation at a ratio of 0.5:1; 0.8 acres of Chamise Chaparral which requires 0.4 acre for mitigation at a ratio of 0.5:1; 3.8 acres of Diegan Coastal Sage Scrub, Inland Form, which requires 7.6 acres for mitigation at a ratio of 2:1; 12.8 acres of Flat-top Buckwheat which requires 25.6 acres for mitigation at a ratio of 2:1; 4.6 acres of Coast Live Oak Woodland which requires 13.8 acres for mitigation at a ratio of 3:1; 43.7 acres for Project development and 2.2 acres of open space easement vacation of Engelmann Oak Woodland which requires a total of 144.3 acres for mitigation at a ratio of 3:1 as



well as a mitigation ratio of 6:1 for impacts in an area designated as an open space easement; 15.3 acres of Mixed Oak Woodland which requires 45.9 acres for mitigation at a ratio of 3:1; 0.8 acre of Mixed/Oak/Coniferous/Bigcone/Coulter which requires 2.4 acres for mitigation at a ratio of 3:1; 101.5 acres for Project development and 1.3 acres of open space easement vacation of Non-native Grassland which requires a total of 52.1 acres for mitigation at a ratio of 0.5:1 for project impacts, as well as a mitigation ratio of 1:1 for impacts in an area designated as an open space easement; 7.3 acres of Montane Meadow which requires 21.9 acres for mitigation at a ratio of 3:1; and 0.25 acre of Riparian Scrub which requires 0.75 acres for mitigation at a ratio of 3:1.

Of these habitats, hydrophytic areas of ~~of~~ 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." This is 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 Section 15380 of the State CEQA Guidelines. This definition includes 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. Guideline 3 is exceeded, impacts are significant, and mitigation would be required. **(Impact BI-12)**

*Guideline 4 The project would not minimize and/or mitigate coastal sage scrub habitat loss in accordance with Section 4.3 of the Natural Communities Conservation Planning Process (NCCP) Guidelines.*

The Proposed Project has been designed to minimize impacts to CSS to 3.8 acres, or nine percent of the site's resource. On-site mitigation at a 2:1 ratio of preservation to impact is provided. Mitigation of all impacts to coastal sage scrub habitat loss via the dedication of land and the implementation of management agreements, both of which are acceptable mitigation options listed in Section 4.3 of the NCCP Guidelines, would be implemented. Guideline 4 is not exceeded, impacts are less than significant, and no mitigation is necessary.

*Guideline 5: The project does not conform to the goals and requirements as outline in any applicable Habitat Conservation Plan (HCP), Habitat Management Plan (HMP), Special Area Management Plan (SAMP), Watershed Plan, or similar regional planning effort.*

The Proposed Project is not located in an area subject to the goals and requirements as outlined in any existing Habitat Conservation Plan (HCP), Resource Management Plan (RMP), Special Area Management Plan (SAMP), Watershed Plan or similar regional planning effort. Guideline 5 is not exceeded, impacts are less than significant, and no mitigation is necessary.

*Guideline 6: The project would preclude connectivity between areas of high habitat values, as defined by the Southern California Coastal Sage Scrub Natural Communities Conservation Planning Process (NCCP) Guidelines.*

The Proposed Project would not preclude connectivity between areas of high habitat values, as defined by the NCCP Guidelines. This is because the limited amount of CSS on the subject site does not qualify as an area of “high (CSS) habitat value”. While the site contains many areas of high and very high value habitat, the CSS in particular is successional, patchy, and of lower conservation value. Also, due to its successional nature, the onsite CSS vegetation exhibits limited offsite habitat connectivity. Furthermore, the Project has been designed to avoid interference with habitat connectivity and wildlife corridors and ensure the ongoing integrity of the open space.

Guideline 6 is not exceeded, impacts are less than significant, and no mitigation is required.

*Guideline 7: The project would reduce the likelihood of survival and recovery of listed species in the wild.*

The Proposed Project would have no effect on the likelihood of survival and recovery of listed species in the wild because large areas of protected open space are provided. California Gnatcatcher does not occur on this site, and the only other listed species (Cuyamaca Meadowfoam) occurs in an area that would be entirely conserved in open space. Guideline 7 is not exceeded, and impacts are not significant. No mitigation is required.

*Guideline 8: The project would result in the killing of migratory birds or destruction of active migratory bird nests and/or eggs (Migratory Bird Treaty Act).*

In the absence of seasonal avoidance, construction activities associated with Project implementation, such as brushing, clearing, and grading, could result in the death of migratory birds or the destruction of active migratory bird nests and/or eggs. Migratory birds nesting in trees or shrubs to be removed would be impacted, as would any ground nesting migratory birds within areas subject to construction activities. The Proposed Project as proposed could result in the killing of migratory birds or destruction of active migratory bird nests and/or eggs due to intrusions by predatory pets and increased human presence on the site. Guideline 8 is exceeded, impacts are significant, and mitigation is required. **(Impact BI-13)**

*Guideline 9: The project would result in the take of eagles, eagle eggs or any part of an eagle (Bald and Golden Eagle Protection Act).*

No eagles have been detected in the biological surveys conducted for the project, and no known eagle nests are present on-site or within 4000 feet of proposed development. Golden Eagle nesting habitat is not present onsite. This wide-ranging species is known to forage onsite and nest in the Cleveland National Forest, which adjoins the site.

Golden Eagle is declining in San Diego County and is highly sensitive to human activity. The Proposed Project would result in the fragmentation of [206.9201.9](#) acres of Golden Eagle foraging habitat. Additionally, if project grading were to occur during the breeding season for the Golden Eagle, this may result in disturbance of the breeding pattern which might result in take. Project activities could modify eagle behavior, resulting in take as defined by the Wildlife Agencies. Therefore, Guideline 9 is exceeded, and impacts are significant. Mitigation is necessary. **(Impact BI-14)**

### 2.1.3 Cumulative Impact Analysis

A study area approximately two miles south, southeast, and northeast, and one mile north and west of the Proposed Project was selected. This area was selected for its topographic and biotic relationship to the Proposed Project. Areas with similar elevation variations to the east and west are included in order to capture similarities in habitat -due to climate and topography. Additionally, these areas are included to capture continuity with wildlife movement corridors and habitat connectivity to the east and west, particularly along Orinoco/Temescal Canyon Creek. The study area is shown on Figure 1-7, "Master Cumulative Impacts Map," and subsequent detail maps 1-8A through 1-8E.

#### 2.1.3.1 *Special Status Species*

Six other proposed projects in the study area have biological impacts that may include Species of Special Status. These are MUP 77-113 (Julian Sanitation District Sprayfield), TPM 19932 (Ortega 4-lot Subdivision), SP 02-029 (Behen Single Family Dwelling), TPM 20253 (Sauter 5-lot Subdivision), TPM 20571 (Learn 5-lot Subdivision), and TPM 20474 (Klucewich Trust 4-lot Subdivision). The potential impacts associated with these projects are detailed in Table 1-1, "Cumulative Projects".

By design these projects have avoided extensive impacts to special status species. The projects are limited in scale. Most impacts to Special Status Species associated with these projects would consist of impacts to native habitat with the potential to support Special Status Species.

Of the impacts that were quantified, the cumulative projects impact 2.54 acres of oak chaparral, 19.22 acres of Mixed Montane Chaparral, 1.85 acres of Jeffery Pine, some *Symphonicarpus Eriogonum*, 21.5 acres of Chaparral, 5.4 acres of Dry Montane Meadow, 9.1 acres of Mixed Oak Woodland, and 0.3 acres of Open Water. The Proposed Project has impacts in three of these categories. It impacts 15.3 acres of Mixed Oak Woodland, 13.4 acres of Chaparral (12.6 acres of Southern Mixed Chaparral and 0.8 acre of Chamise Chaparral), and 7.3 acres of Dry Montane Meadow. This amounts to 63 percent, 38 percent, and 57 percent, respectively, of the cumulative impacts to these species.

TPM 19932 supports Velvety False-Lupine. However, the Proposed Project proposes an open space easement to avoid impacts to that Special Status Species.

Cumulative impacts to Special Status Species are not significant because impact areas are limited in scale and/or do not significantly impact large numbers of special status species.

The loss of these habitat areas does not impinge upon the continued viability of this species in the region, because these habitats are widespread in the region. Additionally, all projects with impacts to these habitats conform to County regulations for the protection of sensitive species, and have been required to mitigate for those impacts. Through a program of avoidance, mitigation and adherence to County regulations, these cumulative impacts do not preclude the continued viability of these habitats. Therefore, cumulative impacts to special status species are not significant, and no mitigation is required.

### **2.1.3.2 *Riparian Habitat or Sensitive Natural Community***

The Proposed Project would contribute to the cumulative loss of Riparian Habitat or other Sensitive Natural Communities. That is, the Proposed Project would 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 for Project development and 2.2 acres of open space easement vacation of Engelmann Oak Woodland, 15.3 acres of Mixed Oak Woodland, 0.8 acre of Mixed Oak/Coniferous/Bigcone/Coulter, 101.5 acres for Project development and 1.3 acres of open space easement vacation of Non-native Grassland, 7.3 acres of Montane Meadow, and 0.25 acre of Riparian Scrub.

Other active projects in the cumulative study area that would impact Riparian Habitats or Other Sensitive Natural Communities and are MUP 77-113, SP 02-029, TPM 20253, TPM 20571, and TPM 20474. The potential impacts associated with each of these projects are listed in Table 1-1. MUP 77-113 would impact oaks and riparian habitat, SP 02-029 would impact 20 oak trees; TPM 20253 would impact Oak Chaparral and Mixed Montane Chaparral; TPM 20571 would impact Jeffrey Pine Forest, Mixed Montane Chaparral, and Snowberry/Buckwheat; and TPM 20474 would impact Chaparral, Dry Montane Meadow, Mixed Oak Woodland, and Open Water. In general impacts are avoided whenever possible in keeping with County regulations.

All of these projects would mitigate for impacts to Riparian Habitats or Other Sensitive Natural Communities through the dedication of onsite open space easements, as required by County regulations. Individual impacts have therefore been reduced to a level that is less than significant. Cumulative projects do not affect the continued viability of these habitats because of a program of avoidance, mitigation, and adherence to County policy.

Furthermore, due to the extent of the Riparian Habitats (including State and County Wetlands and "Waters") or Other Sensitive Natural Communities on the Proposed Project site, as well as the fact that all impacts to these resources would be mitigated for to a level that is below significant, approval of the Proposed project would not have a cumulatively considerable impact when viewed in connection with effects of past projects, the effects of other current projects, and the effects of probable future projects affecting the same resource.

### **2.1.3.3 *Federal Jurisdictional Wetlands and Waterways***

The Proposed Project would contribute to the cumulative loss of Federal Jurisdictional Wetlands and Waterways. Project-related future construction, grading, clearing or other activities related to the Proposed Project would permanently affect Federal Jurisdictional Wetlands and Waterways on the Proposed Project site. That is, the Proposed Project would directly impact 0.14 acre of jurisdictional wetlands and/or non-wetland "waters".

Other active projects within the cumulative study area that could contribute to the loss of Jurisdictional Wetlands and Waterways within the cumulative study area include MUP 77-113 and TPM 20474. The potential impacts associated with each of these projects are listed in Table 1-1. MUP 77-113 could impact riparian habitat and runoff associated with the project could impact surface and groundwater. TPM 20474 would impact 0.3 acre of Open Water, which likely qualifies as jurisdictional wetlands

and “waters”. MUP 77-113 proposes open space to avoid impacts to riparian habitat, with 100-foot buffers around drainages and no surface run-off. TPM 20474 would mitigate for project impacts through the dedication of an onsite open space easement. Therefore, these projects either avoid impacts to Jurisdictional Wetlands and Waterways or provide mitigation to reduce impacts to a level that is less than significant. No other projects within the cumulative study area are listed as impacting Jurisdictional Wetlands and Waterways. Cumulative impacts are not significant. No mitigation is necessary.

Furthermore, due to the extent of the federal wetlands on the Proposed Project site, as well as the fact that all impacts to Federal Jurisdictional Wetlands and Waterways would be mitigated for to a level that is below significance, approval of the Proposed project would not have a cumulatively considerable impact when viewed in connection with effects of past projects, the effects of other current projects, and the effects of probable future projects affecting the same resource.

#### **2.1.3.4 *Wildlife Movement and Nursery Sites***

Other proposed projects within the cumulative study area that could potentially impact Wildlife Movement or Nursery Sites include MUP 77-113, TPM 20253, TPM 20571, and TPM 20474. Each of these projects could remove native vegetation and therefore impact wildlife movement. However, the areas to be impacted by these projects are small (no more than 40 acres for the largest project) and each project proposes onsite open space that would preserve a portion of each project site for wildlife movement. Therefore, all of these projects have either minimal impacts or significant impacts that would be mitigated for to a level that is less than significant.

Because the Proposed Project creates no significant impacts to Wildlife Movement or Nursery Sites, and the other proposed projects within the cumulative study area would not result in significant impacts to Wildlife Movement or Nursery Sites, approval of the Proposed Project would not result in cumulatively considerable impacts when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects affecting the same resource. Cumulative impacts to Wildlife Movement and Nursery Sites are not significant, and no mitigation is required.

#### **2.1.3.5 *Local Policies, Ordinances and Adopted Plans***

The other projects within the cumulative study area (MUP 77-113, TPM 19932, SP 02-029, TPM 20253, TPM 20571, and TPM 20474) conform to local policies, ordinances, and adopted plans that are current at the time of their applications. Several of these projects already have Mitigated Negative Declarations. The remaining cumulative projects would conform to a range of policies intended to protect biological resources, including requirements for the effective management of protected open space, the no net loss of wetlands policy, and controls on runoff and stormwater. All projects with CSS impacts must meet County HLP requirements, which include 4d Findings. These Findings include a finding that a project’s loss of CSS would not have a significant negative impact when considered in conjunction with CSS losses that have already occurred in the region. Findings are not made if these impacts are present. As such, County policy precludes approval of projects which have a cumulatively significant impact to CSS.



Therefore, the other projects within the cumulative study area would not have significant impacts in relation to conformance with Local Policies, Ordinances, and Adopted Plans. Furthermore, due to the fact that all impacts to Local Policies, Ordinances, or Adopted Plans associated with the Proposed Project would be mitigated for to a level that is below significance, approval of the Proposed Project would not have cumulatively considerable impacts when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects affecting the same resource. Therefore, cumulative impacts are not significant in relation to conformance with local policies, ordinances, and adopted plans. No mitigation is necessary.

## 2.1.4 Significance of Impacts Prior to Mitigation

The following is a brief summary of all direct and indirect impacts which were determined to be significant by the analysis provided by the Biological Resources Survey (Appendix A).

### 2.1.4.1 *Impacts to Special Status Species*

- BI-1 Indirect long-term (permanent) impacts to Swainson's Hawk and Cuyamaca Meadowfoam, which are Threatened or state-listed Endangered Species, due to habitat loss.
- BI-2 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, Two-striped Garter Snake, and Large-blotched Salamander. Indirect impacts: Velvety False Lupine, 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.
- BI-3 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, Orange-throated Whiptail, San Diego Ringneck Snake, Coronado Skink, San Diego Horned Lizard, Coastal Western Whiptail, Coastal Rosy Boa, [San Diego Mountain Kingsnake](#), and Northern Red Diamond Rattlesnake. Indirect impacts: Great Blue Heron, [California](#) Horned Lark, Western Bluebird, Barn Owl, Mountain Lion, Mule Deer, and Monarch Butterfly.
- BI-4 Direct and indirect long-term (permanent) impacts to Golden Eagle habitat due to habitat conversion.
- BI-5 Direct long-term (permanent) impacts to up to [206.9201.9](#) 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.
- BI-6 Indirect long-term (permanent) impacts to special status species due to human presence or intrusion into sensitive habitat.
- BI-7 Indirect short-term (temporary) impacts to nesting success of special status species due to grading and other noise-generating activities.

**2.1.4.2 Impacts to Riparian Habitat or Sensitive Natural Communities**

- BI-8 Direct long-term (permanent) onsite impacts to sensitive native or naturalized habitat resulting from construction, grading, or clearing include 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 for Project development and 2.2 acres of open space easement vacation of Engelmann Oak Woodland, 15.3 acres of Mixed Oak Woodland, 101.5 acres of Non-native Grassland, 7.3 acres of Montane Meadow, and .25 acre of Riparian Scrub.
- BI-9 Project-related future construction, grading, clearing, or other activities would result in direct long-term (permanent) impacts to jurisdictional wetlands and/or riparian habitats, as defined by CRWQCB, CDFW, and the County of San Diego RPO. This would 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, and Riparian Scrub would be impacted by the Proposed Project qualify as jurisdictional wetland and/or riparian habitats.
- BI-10 Indirect long-term (permanent) impacts due to increased human access or competition from domestic animals, pests or exotic species to levels proven to adversely affect sensitive habitats.

**2.1.4.3 Impacts to Federal Jurisdictional Wetland and Waterways**

- BI-11 Project-related future construction, grading, clearing, or other activities would result in direct long-term (permanent) impacts to federal jurisdictional wetlands and/or waterways, as defined by ACOE. This would 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 would impact 0.14 acre of Federal Jurisdictional Wetlands and/or Waterways.

**2.1.4.4 Impacts to Local Policies, Ordinances, Adopted Plans**

- BI-12 Direct long-term (permanent) impacts to a measurable amount of RPO-sensitive habitat lands. That is, the Proposed Project would 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 for Project development and 2.2 acres of open space easement vacation of Engelmann Oak Woodland, 15.3 acres of Mixed Oak Woodland, 101.5 acres for Project development and 1.3 acres of open

space easement vacation of Non-native Grassland, 7.3 acres of Montane Meadow, and 0.25 acre of Riparian Scrub onsite.

Of these habitats, hydrophytic areas of ~~of~~ JU 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 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 long-term (permanent) and indirect long-term (permanent) impacts because the Proposed Project could, without seasonal restrictions, 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.
- BI-14 The Proposed Project would create indirect long-term (permanent) impacts because the Project Site does support Golden Eagles, and would 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.

## 2.1.5 Mitigation

The following mitigation measures are proposed to mitigate for the listed impacts:

### 2.1.5.1 M-BI-1

The ~~4,209.81~~ 214.8-acre Open Space Easement would preclude future development or other use of the land within that area and provides the mitigation required for all biological impacts onsite (M-BI-1 through M-BI-19).

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

A complete breakdown of Proposed Project impacts, mitigation requirements, impact neutral acreage, and mitigation area provided within the Project open space is provided as follows:

- 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 Project protects a total of 104.9 acres in the

OSE, 26.9 acres of which are impact neutral. The total available for mitigation is therefore 78.0 acres, which is 71.7 acres above the requirement.

- 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 protects a total of 96.1 acres in the OSE, 12.7 acres of which are impact neutral. The total available for mitigation is therefore 83.4 acres, which is 83 acres above the requirement.
- 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 protects a total of 36.8 acres in the OSE, 1.5 acres of which are impact neutral. The total available for mitigation is therefore 35.3 acres, which is 31.5 acres above the requirement.
- 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 protects a total of 58.6 acres in the OSE, 6.0 acres of which are impact neutral. The total available for mitigation is therefore 52.6 acres, which is 27.0 acres above the requirement.
- 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.
- A loss of 43.7 acres for Project development and 2.2 acres of open space easement vacation of Engelmann Oak Woodland requires a total of 144.3 acres of mitigation at ratios 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 requirement.
- 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.
- 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.
- 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.
- 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.
- A loss of 0.25 acre of Riparian Scrub requires 0.75 acre of mitigation at a ratio of 3:1. The Proposed Project provides 2.96 acres in the OSE. 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 onsite acres of Riparian Scrub are considered 'impact neutral', and cannot satisfy the requirement for mitigation of

this impact. The proposed mitigation would be either offsite mitigation in an approved wetland mitigation bank, or the preparation and implementation of an approved Wetland Revegetation Plan (provided as Attachment E to the biology report), in keeping with the no net loss of wetland policy adopted by the County.

#### **2.1.5.2 M-BI-2**

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

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

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

#### **2.1.5.3 M-BI-3**

The protections provided by the RMP over the open space areas onsite would provide protections for raptors (including Golden Eagle, specifically), migratory birds, and other sensitive bird species' and their habitats as well. In order to prevent potential impacts to the nesting success of sensitive animals, site brushing, grading, and/or the removal of native vegetation within 500 feet of any potential nesting location shall not take place during the native bird season, defined as from 1 January ~~through September 1<sup>st</sup>~~ 31 August each year. This is required in order to ensure compliance with the federal Migratory Bird Treaty Act and Sections 3505, 3505.5, and 3513 of the California Fish and Game Code, which prevent the 'take' of eggs, nests, feathers, or other parts of most native bird species. Should it be necessary to conduct brushing, grading, or other construction activities during the bird breeding season, a biologist with experience conducting bird breeding surveys will conduct a preconstruction nesting survey of all areas within 500 feet of the proposed activity would be required. The results of the survey would be provided in a report to the Director, Department of Planning and Development Services and the Wildlife agencies for concurrence with the conclusions and recommendations. If an active nest is detected, no grading or other construction activity will be allowed within the 500 foot buffer will be allowed until the fledged birds have left the nest. The buffer distance may be altered in which case a site specific nest protection plan will be developed. The plan will include detailed methodologies and definitions to enable a qualified avian biologist to monitor and implement rest-specific buffers based on the



[individual species involved, site conditions, level of human activity, and other activity in the area.](#)

#### **2.1.5.4 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 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.

#### **2.1.5.5 M-BI-5**

A Conservation Grazing Management Plan (CGMP) for the Proposed Project contains site-specific conservation measures and practices that address multiple resource concerns on areas where grazing related activities or practices would be planned and applied. This includes a discussion of climate, water resources, geology, special physical features, soils, erosion, hydrology, surface water drainage, and water quality along with grazing capacity, infrastructure, special management areas and hazards, ecosystem health, special habitats and feature characteristics. The CGMP identifies predicted effects and desired conditions, including the consequences of grazing and related management of special resources, non-grazing (but related) management of special resources, alternative feasible management scenarios, and timeline of management requirements of special resources affected by grazing. The Plan discusses sustainability, including integration with the regional socio-economic systems for long-term viability, and guidelines, incentives, and contingencies for all operations. Finally, the CGMP defines the monitoring of site conditions and the planned effects on resources related to grazing, including monitoring variables, methods, a schedule, evaluation standards and analysis, adaptation of management actions, and reporting. [The CGMP will be applied if grazing occurs in the open space area.](#)

#### **2.1.5.6 M-BI-6**

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

#### **2.1.5.7 M-BI-7**

The Proposed Project is in compliance with the County's RPO requirement that impacts to RPO wetlands be avoided except under certain extenuating circumstances (See RPO Section 86.604(a)(5)). Section 2.1.2.5 of this ~~DEIR~~FEIR provides the details of those impacts and their analysis. The County also requires buffers of at least 50-feet to protect all RPO wetlands. The County considers RPO wetlands and the habitat within RPO wetland buffers to be "impact neutral" and

therefore unavailable for use as mitigation for project impacts. Furthermore, where oak woodland occurs adjacent to an RPO wetland, the County requires that the wetland buffer be extended outward to include the entirety of the oak habitat (not to exceed 200 feet in width). Where feasible, the Proposed Project complies with these requirements.

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

The least damaging construction methods would be utilized to construct the RPO wetland crossing and driveways. Staging areas would be located outside of sensitive areas, work would not be performed during the avian breeding season, noise attenuation measures would be included, and hours of operation would be limited so as to comply with all applicable ordinances and avoid impacts to sensitive resources. These measures would also be included in the RMP to be prepared as a Condition of Project Approval. Lastly, as discussed above, all direct impacts to RPO wetlands would be mitigated for at a 3-to-1 ratio, with no less than 1-to-1 of this total consisting of wetlands creation.

#### **2.1.5.8 M-BI-8**

The Proposed Project would be required to obtain a HLP from the County of San Diego. The permit would mitigate agency concerns by providing appropriate mitigation for all project-related impacts to Diegan Coastal Sage Scrub and related Scrub habitats. The site supports approximately 150.3 acres of Scrub habitat (Diegan Coastal Sage Scrub, Inland Form, Flat-top Buckwheat, and Coastal Sage – Chaparral Scrub), 16.7 acres of which would be impacted by development.

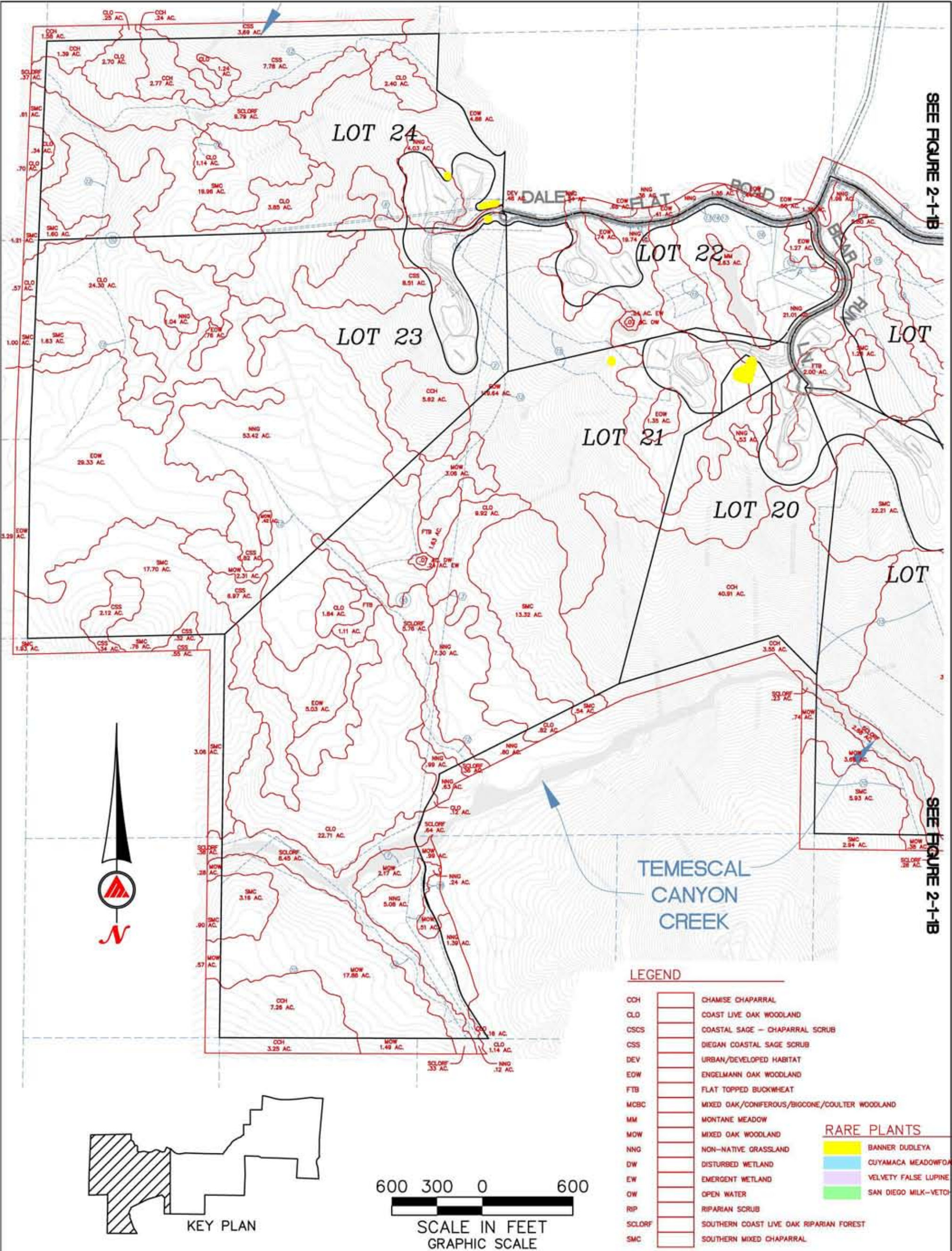
#### **2.1.6 Conclusion**

Biological resources were analyzed by a County-qualified biological consultant. The analysis included review of prior records and reports, field visits, and review of current mapping. Future development of the Proposed Project Site, as presently proposed, could result in significant direct and indirect short- and long-term impacts to the following biological resources: species of special status, riparian resources, federal jurisdictional wetlands, wildlife movement and nursery sites, and local policies, ordinances, or adopted plans. Mitigation for these impacts is proposed, as follows: The Proposed Project proposes a [4,209.81,214.8](#)-acre open space preserve to protect sensitive species, riparian and jurisdictional wetlands, and nursery sites. The open space design includes 50-foot buffers adjacent to oaks, as well as 50 to 200 foot buffers adjacent to wetland wherever possible. A CGMP for the Proposed Project is designed to direct ongoing grazing activities within open space areas. A RMP would be required that would specify management activities and reporting within the open space. The Grazing Manager and the Habitat Manager would work in tandem, through the prescriptions provided by their respective resource management plans, to ensure that grazing activities are harmonious

with the onsite resources. This mitigation would provide open space protections that preserve sensitive habitats and manage the open space in perpetuity. Protections consist of fencing and signage, as needed, to deter intrusions. Professional management and reporting would be incorporated to ensure that protections remain effective and that the open space is monitored on an on-going basis.

Direct impacts to sensitive habitats would be mitigated by a program of onsite open space preservation. Mitigation is provided according to County approved mitigation ratios, ranging from 0.5 to 3 acres for each acre of project impact. Wetland loss would be mitigated with either the purchase of credits at an approved mitigation bank, or additional wetland creation and enhancement onsite which shall be subject to the requirements of an approved WRP, in keeping with the no net loss of wetland policy adopted by the County. Construction and related activity would be restricted during the breeding season of sensitive and migratory birds. The appropriate permits would be obtained from ACOE, CDFW, or the County of San Diego prior to grading or construction in wetlands, CSS, or other protected habitats. These would include a Habitat Loss Permit (4d) for impacts to CSS. Through a program of avoidance and open space protection, permitting, controls on grading and construction activity, and on-going professional management, the Proposed Project mitigates its significant impacts to below a level of significance. No further mitigation is required.

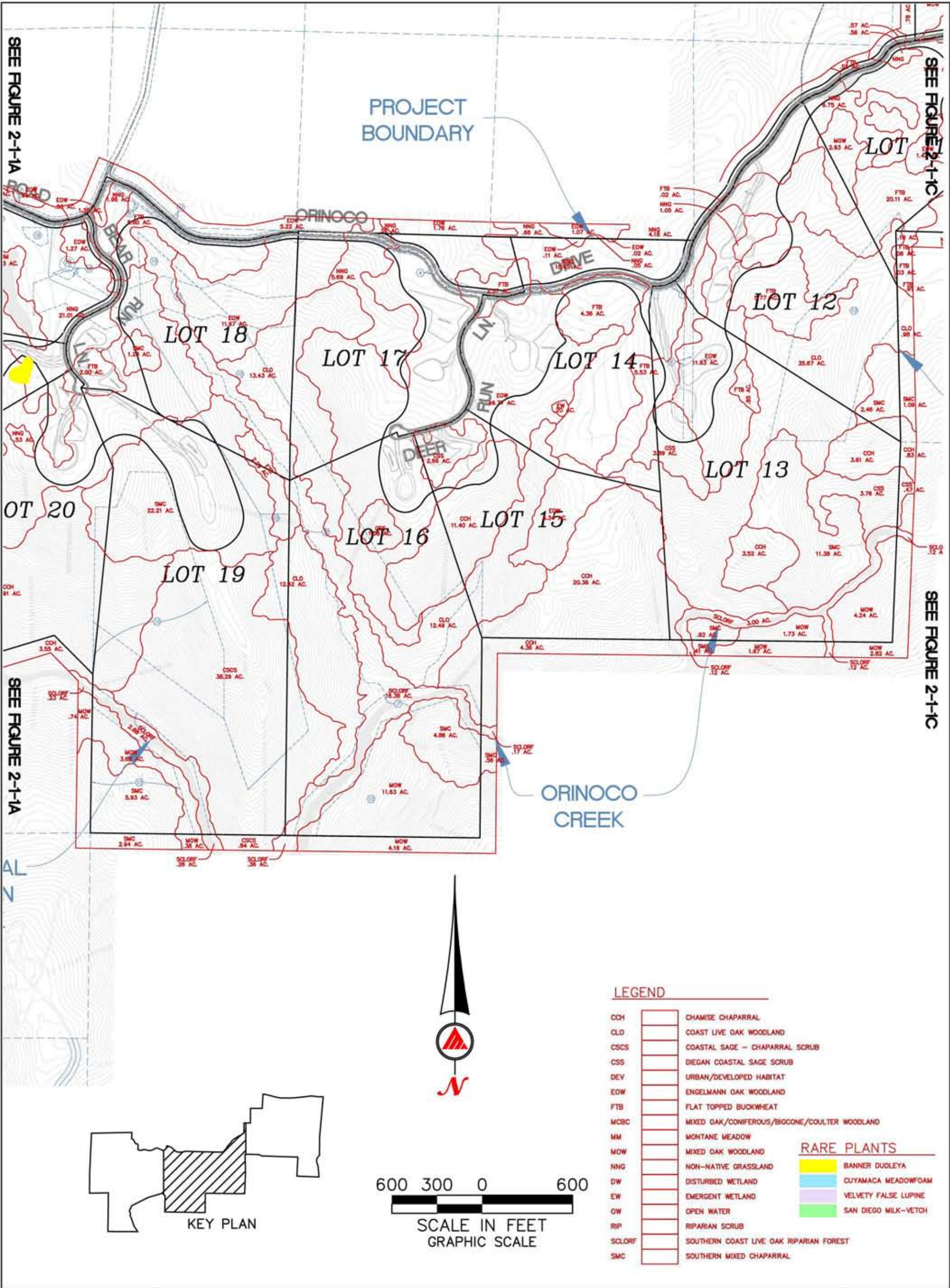




SEE FIGURE 2-1-1B

SEE FIGURE 2-1-1B





**FIGURE 2-1-1B**

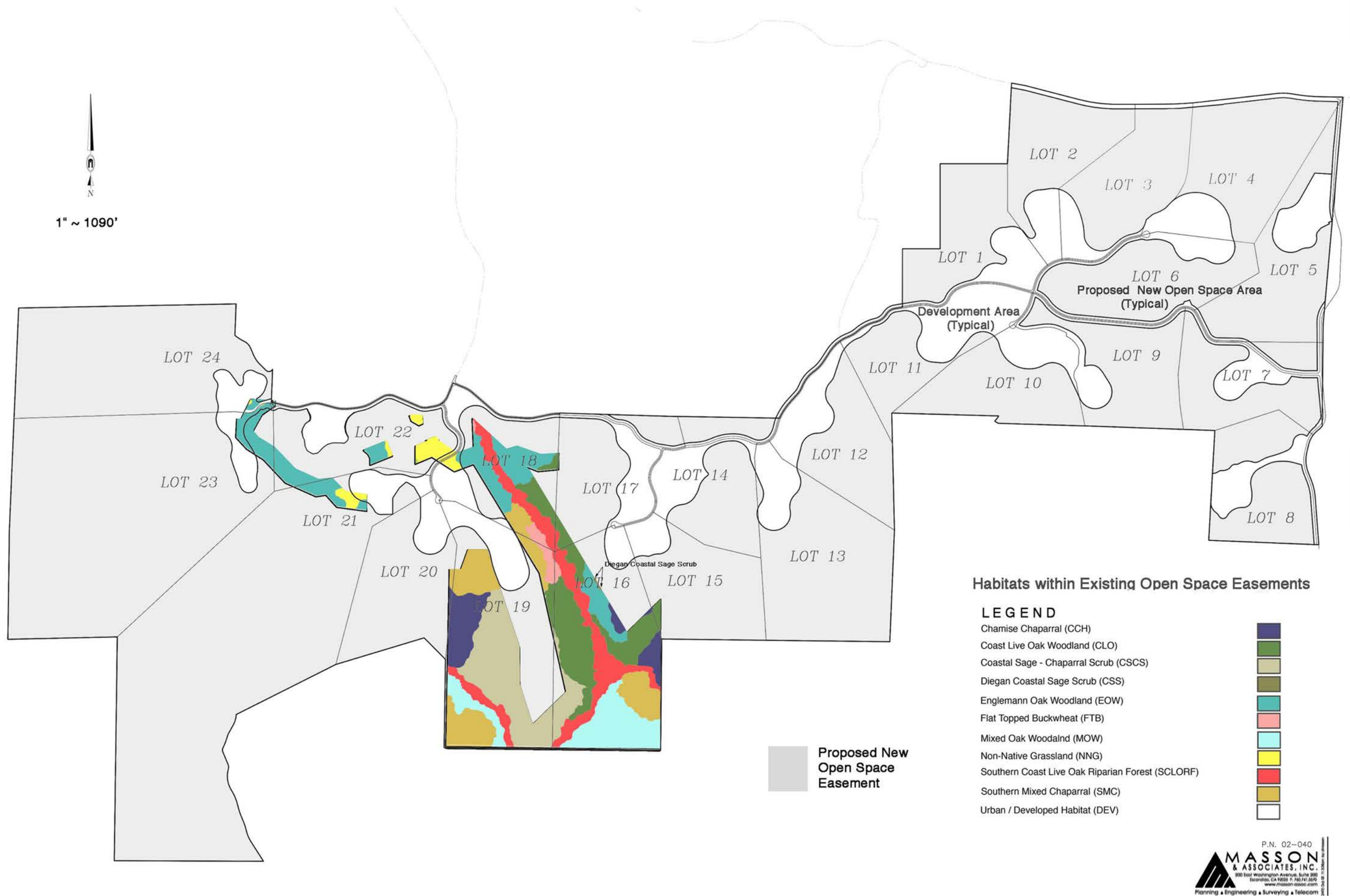
**BIOLOGICAL RESOURCES - CENTRAL**

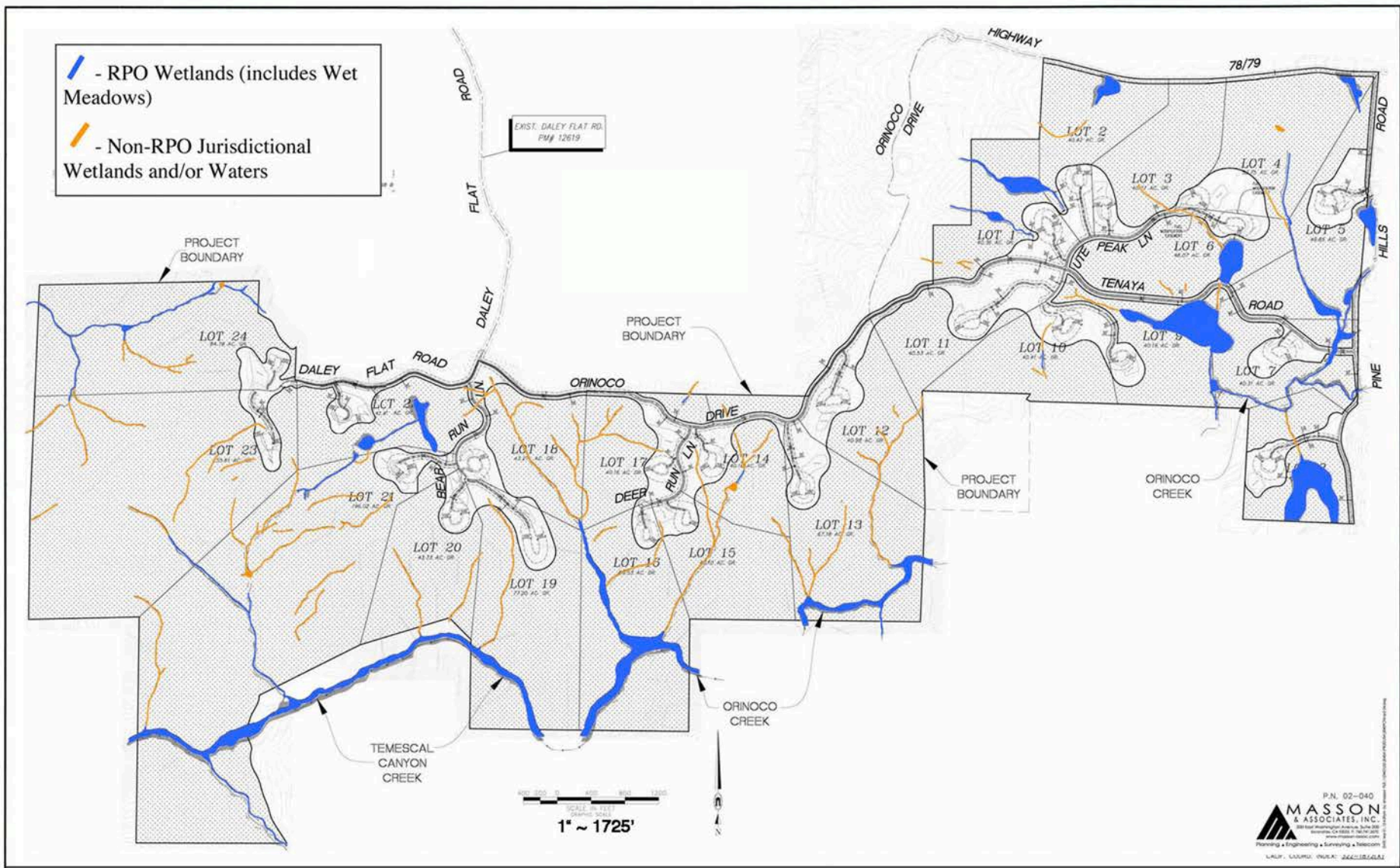
**TRC CONSULTANTS**














**Figure  
2-1-3**

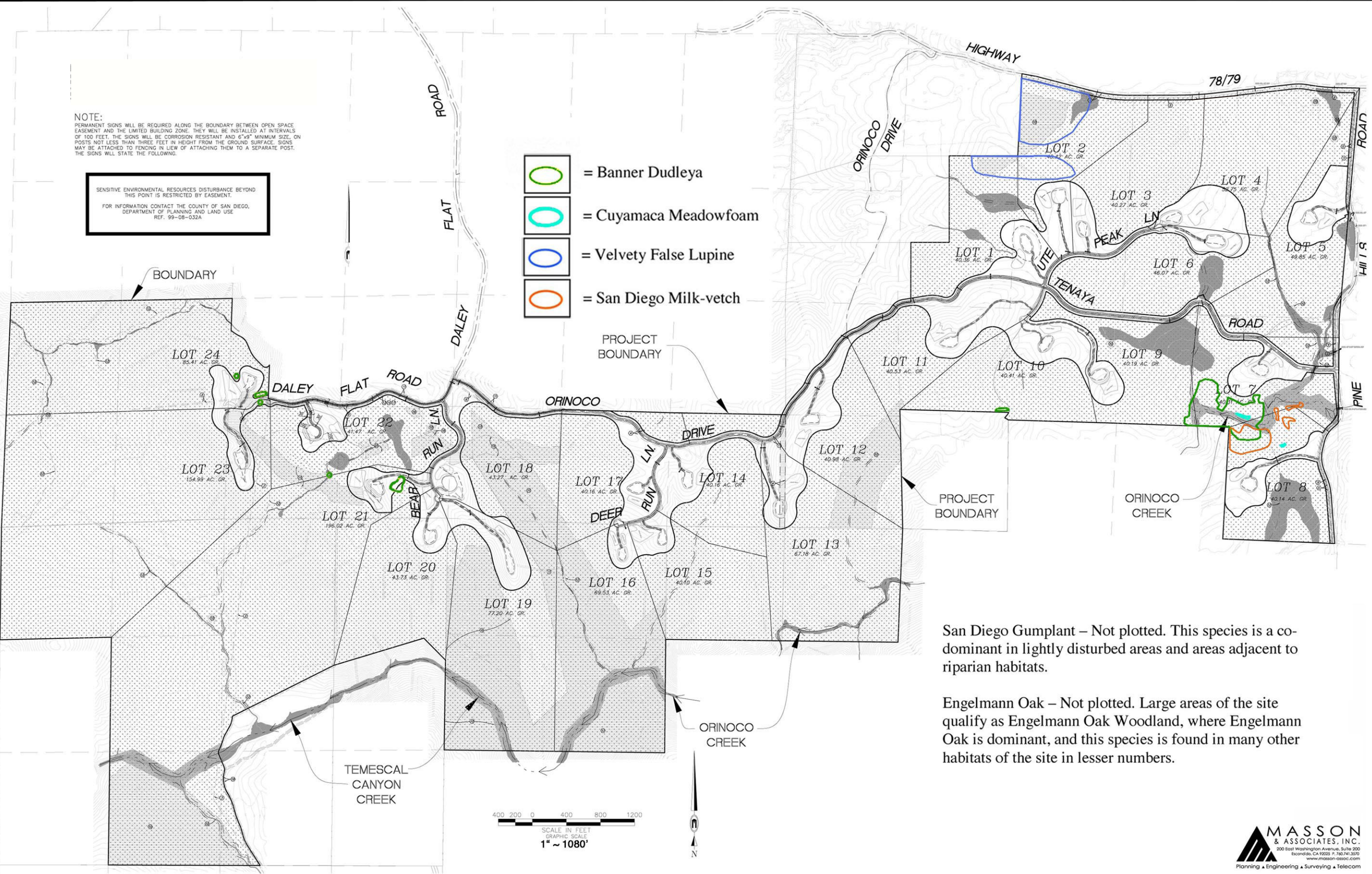
## Wetland Delineation



NOTE:  
PERMANENT SIGNS WILL BE REQUIRED ALONG THE BOUNDARY BETWEEN OPEN SPACE EASEMENT AND THE LIMITED BUILDING ZONE. THEY WILL BE INSTALLED AT INTERVALS OF 100 FEET. THE SIGNS WILL BE CORROSION RESISTANT AND 6"x9" MINIMUM SIZE. ON POSTS NOT LESS THAN THREE FEET IN HEIGHT FROM THE GROUND SURFACE. SIGNS MAY BE ATTACHED TO FENCING IN LIEU OF ATTACHING THEM TO A SEPARATE POST. THE SIGNS WILL STATE THE FOLLOWING:

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

-  = Banner Dudleya
-  = Cuyamaca Meadowfoam
-  = Velvety False Lupine
-  = San Diego Milk-vetch



San Diego Gumplant – Not plotted. This species is a co-dominant in lightly disturbed areas and areas adjacent to riparian habitats.

Engelmann Oak – Not plotted. Large areas of the site qualify as Engelmann Oak Woodland, where Engelmann Oak is dominant, and this species is found in many other habitats of the site in lesser numbers.



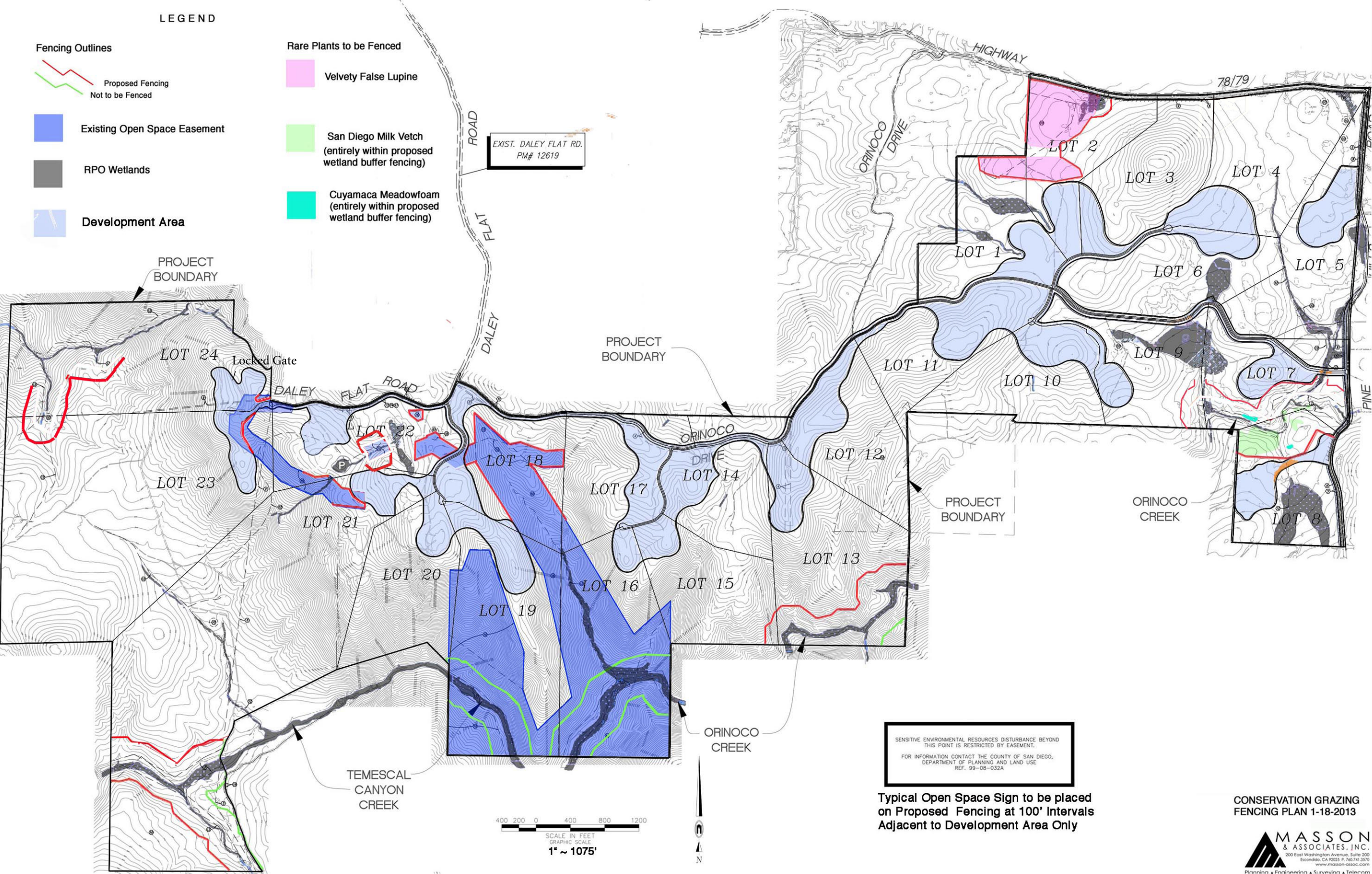
LEGEND

- Fencing Outlines**

  - Proposed Fencing
  - Not to be Fenced
- Rare Plants to be Fenced**

  - Velvety False Lupine
  - San Diego Milk Vetch (entirely within proposed wetland buffer fencing)
  - Cuyamaca Meadowfoam (entirely within proposed wetland buffer fencing)
- Other Features**

  - Existing Open Space Easement
  - RPO Wetlands
  - Development Area



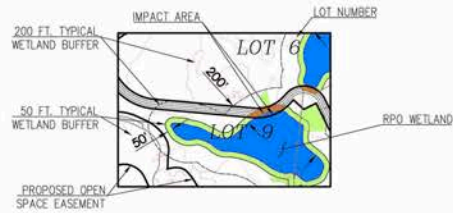
SENSITIVE ENVIRONMENTAL RESOURCES DISTURBANCE BEYOND THIS POINT IS RESTRICTED BY EASEMENT.  
FOR INFORMATION CONTACT THE COUNTY OF SAN DIEGO,  
DEPARTMENT OF PLANNING AND LAND USE  
REF. 99-08-032A

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

CONSERVATION GRAZING  
FENCING PLAN 1-18-2013

**MASSON & ASSOCIATES, INC.**  
200 East Washington Avenue, Suite 200  
Escondido, CA 92025 P. 760.741.3570  
www.masson-assoc.com  
Planning • Engineering • Surveying • Telecomm





BLUE AREAS ARE COUNTY OF SAN DIEGO WETLANDS

GREEN COUNTY OF SAN DIEGO RPO

ORANGE BUFFER IMPACTS

③ ENCROACHMENT NUMBER

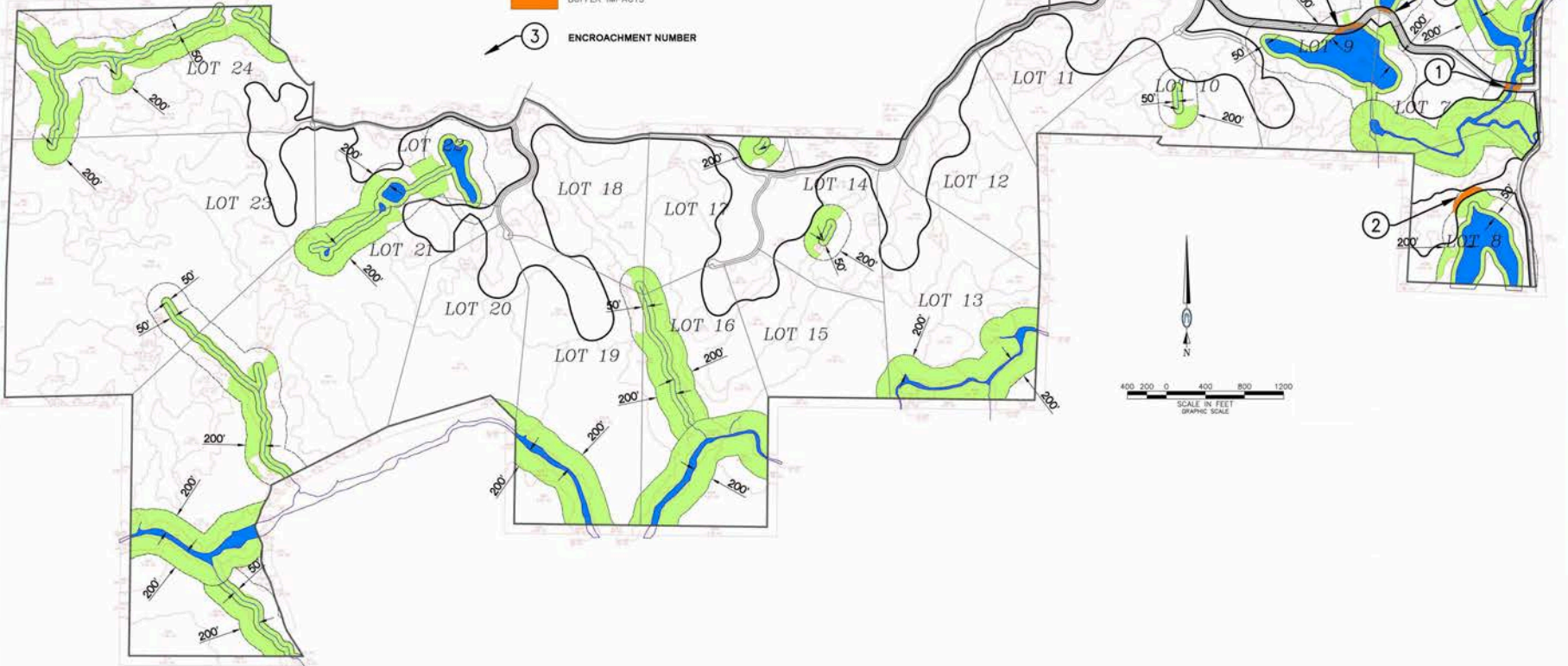


Figure  
2-1-6

## Proposed Project - RPO Encroachments

<b>Habitat</b>	<b>Existing Acres</b>	<b>Development Impact Acres</b>	<b>OSE Vacation Impact Acres</b>	<b>“Impact Neutral” Acres</b>
<u>Southern Mixed Chaparral</u>	117.5	12.6	0.00	26.9
<u>Chamise Chaparral</u>	96.9	0.8	0.00	12.7
<u>Diegan Coastal Sage Scrub</u>	40.6	3.8	0.00	1.5
<u>Flat-top Buckwheat</u>	71.4	12.8	0.00	6.0
<u>Coastal Sage–Chaparral Scrub</u>	38.3	0.00	0.00	23.8
<u>Coast Live Oak Woodland</u>	175.8	4.6	0.00	51.8
<u>Engelmann Oak Woodland</u>	246.0	45.9	2.2	44.2
<u>Mixed Oak Woodland</u>	115.0	15.3	0.00	45.4
<u>Mixed Oak/.../Coulter</u>	8.7	0.8	0.00	2.8
<u>Non-native Grassland</u>	375.8	102.8	1.3	13.8
<u>Montane Meadow</u>	76.3	7.3	0.00	2.3
<u>Southern CLO Riparian Forest</u>	49.5	0.00	0.00	47.54
<u>Open Water</u>	0.07	0.00	0.00	0.00
<u>CVF Marsh/Emergent Wetland</u>	0.85	0.00	0.00	0.17
<u>Riparian Scrub</u>	3.21	0.25	0.00	2.96
<u>Disturbed Wetland</u>	0.07	0.00	0.00	0.00
<u>Urban/Developed Habitat</u>	0.8	0.00	0.00	0.00
<b><u>Totals (rounded)</u></b>	<b>1416.8</b>	<b>207.0</b>	<b>3.5</b>	<b>281.9</b>

## 2.2 Cultural Resources

An archaeological survey of the 1,416.5-acre Hoskings Ranch Proposed Project Site was conducted by Mary Robbins-Wade, who is on the County of San Diego's list of approved consultants for the preparation of cultural resource studies. The resulting report, entitled, Cultural Resources Assessment for the Hoskings Ranch Project, Julian, San Diego County, California TM 5312RPL3, Log. No. 03-10-005, with a revision date of July 2013, is included as Appendix C to this **DEIR/FEIR**. The current archaeological assessment is based upon the work of Professional Archaeology Associates that was done in 2003.

### 2.1.72.2.1 Existing Conditions

The Proposed Project is bounded by SR 78/79 on the north and large lot residential uses on the north and east. The Cleveland National Forest extends through the site on the southwest and west. The western boundaries abut private land holdings within the Cleveland National Forest.

Archaeological research has pieced together a succession of cultures that have developed in the San Diego region. The earliest accepted archaeological evidence of Native Americans in the San Diego area is the culture of San Dieguito people, dating back to approximately 10,000 years ago. The artifacts associated with this culture consist primarily of scrapers, scraper planes, choppers, large blades, and large projectile points. The San Dieguito culture was gradually replaced by the La Jolla culture, hunters and gatherers with a heavy emphasis on plant and plant seed processing, as evidenced by abundant manos and metates (grinding tools and sites). The Late Prehistoric period is represented by the San Luis Rey culture in northern San Diego and the Cuyamaca culture in the southern portion of the county. The boundary dividing these cultures runs approximately east to west through Escondido. The southern group, the Yuman-speaking *lipay-Kumeyaay*, occupied the region in which the Hoskings Ranch site is located.

The *lipay-Kumeyaay* subsistence economy included hunting, fishing and gathering, but the bulk of their diet was provided by plant foods. Settlements such as permanent villages and campsites are located in oak woodland valleys and catchment basins in the coastal zone, the foothills, the Peninsular Range and, to a lesser extent, in the desert beyond. Resource extraction and processing sites are clustered around the settlements, with temporary camps and extractive sites located in more distant areas. Seasonal movements within a communally-owned village territory were practiced; these movements were directly related to the changing availability of critical resources.

Spanish contact began with the Cabrillo expedition in 1542 which explored portions of the coast and the Channel Islands to the north. At the time of European contact, ancestors of the modern-day Kumeyaay Indians occupied an area that presently includes southern San Diego County, the southern two-thirds of Imperial County, and northern Baja California.

Between the 1860s and the early 1900s, successive waves of pioneers moved into more remote areas of the county in search of land and minerals. The discovery of gold in the Julian area during this period led to the historic settlement of San Diego's mountainous east county. The development of Julian and the surrounding areas closely followed this mining town development.

This brief history illustrates the rather high potential for finding cultural resources on the Proposed Project Site. Records searches for the area revealed approximately 150

potential pre-historic and historic archaeological sites of significance within a mile of the site. Most of the archaeological sites include bedrock milling features with and without artifacts. The historic archaeological resources include remnants of homesteads and ranches, as well as bridge and road foundations, feed troughs, and corrals.

The Proposed Project Site has been a cattle ranch since the 1880s, when the land was first homesteaded, and only ceased to be used for cattle within recent years.

#### **2.1.7.12.2.1.1 Regulatory Framework**

A number of criteria are used in demonstrating resource importance. Specifically, criteria outlined in the California Environmental Quality Act (CEQA), the Resource Protection Ordinance (RPO), and the San Diego County Local Register provide the guidance for making such a determination.

CEQA section 15064.5a provides criteria for determining that a resource is a historically significant resource. CEQA section 15064.5b defines the determination of 'substantial adverse change' to a resource which engenders impacts. Section 15064.5c of CEQA applies to effects on archaeological sites and contains additional provisions regarding archaeological sites. Sections 15064.5 (d) and (e) contain additional provisions regarding human remains as well as Native American human remains. The San Diego County Local Register of Historical Resources provides criteria for resources assessed for local importance, as opposed to statewide or regional importance.

The San Diego County RPO provides its own definitions for "Significant Prehistoric or Historic Sites."

Section 1.3, "Applicable Regulations," of the Cultural Resources report for the Proposed Project provides further details about these regulations.

#### **2.1.82.2.2 Analysis of Project Effects and Determination as to Significance**

The studies included record searches, field visits, and limited site testing. Previous studies of the site were supplemented with a review of historic maps and photographs.

Forty-five historic and archaeological resources were identified on the Hoskings Ranch site. Thirty-three sites are recorded as prehistoric (pre-contact) Native-American sites, seven are historic period resources, and five sites include both historic and prehistoric material. The historic resources include remnants of homesteads and ranches, as well as bridge and road foundations and water troughs.

In addition, several ranching features within the Proposed Project area have been recorded as a non-contiguous historic district (P-37-031748).

Analysis of Proposed Project effects relates to significance according to sets of criteria from both the RPO and CEQA. RPO significance is a higher level of significance than that which is recognized under CEQA. This includes sites or districts that are eligible for or listed on the National Register of Historic Places (not just the California Register of Historical Resources); locally or regionally unique cultural resources with a significant volume and range of data and material; traditional cultural properties; sites of ritual, ceremonial, or sacred value to an ethnic group; sites containing human remains. See pages 24 through 31 of the cultural resources assessment for the full list of criteria for each.

### 2.1.8-12.2.2.1 **Historical Resources**

#### Guidelines for the Determination of Significance

The guidelines for the Proposed Project were derived from the County of San Diego Guidelines for Determining Significance, Cultural Resources: Archaeological and Historic Resources. The Proposed Project would have a significant impact on historic resources if it:

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

#### Analysis

*Guideline 1: The project causes a substantial adverse change in the significance of an historical resource as defined in Section 15064.5 of the State CEQA Guidelines.*

Seven sites within the Proposed Project area have been recorded as historic period resources. See Table 2-2-1, "Historical Resources (CEQA)," at the end of this chapter for the list of resources.

CA-SDI-16,852H and CA-SDI-16,871H were recorded and documented and their remaining cultural value is not significance. P-37-025435, the car body, is not significant due to its lack of association with other sites or records. CA-SDI-16,853H, CA-SDI-16,345H, P-37-025402, and P-37-030448 will be located in open space and will not be directly or indirectly impacted by the project.

The Hoskings Ranch Rural Landscape District (P-37-031748) is proposed to recognize the importance of historic ranching features on the site and to provide for review of future actions by the Historic Site Board. The resource is made up of two pioneer farmstead archaeological sites (CA-SDI-7098/H and CA-SDI-16,881H), two ranching water development sites (CA-SDI-16,863H and CA-SDI-19,345H), one ranching erosion control site (P-37-030448), and a wooden cattle corral (P-37-125402). These features reflect human modification of the landscape, and can be linked thematically to specific processes in the evolution of the property to create a unified whole that provides an increased understanding of the region's history. The two house sites represent the pioneer settlement of San Diego County's backcountry during the late 19th century, while the other features represent the property's development and use as a cattle ranch.

~~These historic resources are located within areas proposed for open space protection. For those resources located in open space, long-term direct and indirect impacts are not significant. However,~~ B-brushing and grading activities associated with the construction of the Proposed Project could result in the discovery of previously unrecorded, potentially significant historical resources. Impacts to such cultural resources would be significant (**Impact CR-1**). Therefore, Guideline 1 is exceeded and mitigation is required.

*Guideline 2: Proposes activities or uses damaging to, and fails to preserve, significant historical cultural resources as defined by the Resource Protection Ordinance.*



See Table 2-2-2, “Historical Resources (RPO),” at the end of this chapter for a list of RPO-significant resources on the subject property.

The significant historic resources placed in open space protection (see table) would not receive direct, long-term impacts from implementation of the Proposed Project. However, brushing and grading activities associated with the construction of the Proposed Project could result in the discovery of previously unrecorded, potentially significant historical resources. Impacts to such cultural resources would be significant (**Impact CR-2**). Therefore, Guideline 2 is exceeded and mitigation is required.

#### 2.1.8.22.2.2.2 **Archaeological Resources**

##### Guidelines for the Determination of Impact Significance

The Proposed Project would have a significant impact on archaeological resources if it:

1. Causes a substantial adverse change in the significance of an archaeological resource as defined in Section 15064.5 of the State CEQA Guidelines.
2. Proposes activities or uses damaging to, and fails to preserve, significant cultural resources as defined by the Resource Protection Ordinance.
3. Disturbs any human remains, including those interred outside of formal cemeteries.

##### Analysis

The survey identified 33 prehistoric sites, and five sites that contain both historic and prehistoric elements. Thirty-four of these sites were either determined to be significant or are assumed significant in the absence of testing.

*Guideline 1: The project causes a substantial adverse change in the significance of an archaeological resource as defined in Section 15064.5 of the State CEQA Guidelines.*

Five sites within the Proposed Project area contain historic and prehistoric archaeological elements, as listed in Table 2-2-3, “Historical/Archaeological Resources (CEQA),” at the end of this chapter.

These historical/archaeological sites would be placed in open space and would not receive direct or indirect long-term impacts from the Proposed Project. However, brushing and grading activities associated with the construction of the Proposed Project could result in the discovery of previously unrecorded archaeological resources. Impacts to such cultural resources would be significant (**Impact CR-3**). Therefore, Guideline 1 is exceeded and mitigation is required.

CA-SDI-16,881 contains important information potential that is being lost as the site erodes away from exposure to the elements (**Impact CR-4**). Mitigation would be required.

Thirty-three prehistoric Native American archaeological sites have been identified within the Proposed Project area, as shown in Table 2-2-4, “Archaeological Resources (CEQA),” at the end of this chapter.

Impacts to the following sites have been reduced to a level below significant through their documentation and recordation (and testing if applicable): CA-SDI-7110, CA-

SDI-16,865, CA-SDI-16,873, CA-SDI-17,057. As such, these sites are unlikely to yield further information important to understanding the prehistoric occupation of the Proposed Project area.

Because these sites have been documented and recorded, they are determined to not be significant, Guideline 1 is not exceeded, impacts are not significant, and no mitigation is required.

*Guideline 2: The project proposes activities or uses damaging to, and fails to preserve, significant cultural resources as defined by the Resource Protection Ordinance.*

All of the historic/archaeological as well as archaeological-only resources listed under Guideline 1, above, are assumed RPO-significant in the absence of testing; four of these (CA-SDI-7098H, CA-SDI-16,854, CA-SDI-16,881H, and CA-SDI-16,863H) assume significance from being part of a historic ranching district. All of these resources are located in open space protection. However, brushing and grading activities associated with the construction of the Proposed Project could result in the discovery of previously unrecorded historical/archaeological or archaeological resources. Impacts to such cultural resources would be significant (**Impact CR-5**). Therefore, Guideline 1 is exceeded and mitigation is required.

*Guideline 3: Disturbs any human remains, including those interred outside of formal cemeteries*

None of the cultural resources identified on the Proposed Project Site contain human remains and therefore no impacts to human remains would result from the Proposed Project. However, brushing and grading activities associated with the construction of the Proposed Project could result in the discovery of previously unrecorded, potentially significant human remains. Impacts to such cultural resources would be significant. (**Impact CR-6**). Guideline 3 is exceeded and mitigation is required.

### **2.1.92.2.3 Cumulative Impact Analysis**

According to CEQA, the importance of cultural resources comes from the research value and the information that they contain. Therefore, the issue that must be explored in a cumulative analysis is the cumulative loss of information. For sites considered less than significant, there is no information, or the information is preserved through recordation, test excavations, and preservation of artifacts. Significant sites that are placed in protected open space easements avoid direct impacts to these cultural resources as well as preservation of their potential research data. Significant sites that are not placed within open space easements and which are directly impacted by the Proposed Project preserve the information through recordation, test excavations, and data recovery programs that would be presented in reports and filed with the County and SCIC.

Based on the current study, 45 historic and archaeological resources have been identified within the Proposed Project area. Thirty-three sites are recorded as prehistoric (pre-contact) Native-American sites, seven are historic period resources, and five sites include both historic and prehistoric material.

Four archaeological sites, through documentation and recordation, have been reduced to a level of no significance (CA-SDI-7110, CA-SDI-16,865, CA-SDI-16,873, and CA-SDI-17,057). One of these (CA-SDI-16,865) would be impacted by the Proposed Project. No mitigation would be required and impacts would not contribute to a cumulative effect. The three remaining archaeological resources are located within the open space.

One resource, CA-SDI-16,871, was found to not meet the criteria for listing in the California Register of Historical Resources through documentation and recordation.

The remaining 40 resources located onsite are RPO-significant. Two historic resources, CA-SDI-7105/7106 and CA-SDI-16,881/H, were determined to be RPO-significant by the archaeologist. The remaining 38 resources are assumed to be RPO-significant in the absence of testing. The majority of these are placed in open space protection, but possible effects from grading activities create the need for mitigation. One historic resource, P-37-030448, is not located within open space protection. Impacts are considered significant, as this site is an element of the significant historic ranching district (P-37-031748), and mitigation is required.

The Proposed Project's potentially significant impacts to cultural resources would be reduced below a level of significance by archaeological monitoring by a County-approved archaeologist and a Native American monitor during grading. Similarly, impacts to any undiscovered or buried potentially significant cultural resources located within the Proposed Project's boundaries would be reduced below a level of significance by similar measures. Thus, all archaeological impacts from the Proposed Project, when reviewed with related cumulative projects in the area, do not contribute to a cumulatively significant impact.

The Proposed Project is located in the west-facing slopes of the Volcan Mountains in the Julian Planning area. The cumulative study area encompasses an approximate one-mile radius to the east and west along this mountain range to incorporate areas of possible prehistoric occupancy. Case file research at the County of San Diego based on this cumulative study area was conducted to determine cumulative impacts. [The results of that research are shown in Table 1-1 of the DEIR/FEIR. Impacts are noted in the right hand column. The table indicates that of the 90 projects reviewed, five have the potential to impact cultural resources. No other projects were noted in the County of San Diego data base as having impacts to archaeology.](#) TPM 20863 has been withdrawn. MUP 72-460-72, a Girls Scout Camp, had impacts to archaeology that were mitigated with open space preservation. SP 03-015, the Leroux residence in downtown Julian, was studied but did not have significant impacts. [MUP 77-113, the Julian sewer plant, was studied but had no impacts to archaeology.](#) MUP 97-005, Red Horse Winery, had the potential to impact archaeology, but a Negative Declaration was issued. The Proposed Project itself has the potential to impact one resource, as mentioned above. Mitigation is proposed to reduce this impact to below significance. [County records for the 90 projects were reviewed. No other projects were noted in the County of San Diego data base as having impacts to archaeology.](#)

Cultural impacts have been avoided to the greatest extent possible in the region, evidenced by the small number of past, present, or anticipated projects in the 90 project study list that have cultural resource impacts. [Projects fully mitigate their impacts or use the project design to avoid impact altogether.](#) Future development in the cumulative study area would be subject to similar analysis and mitigation requirements pursuant to CEQA and RPO. Based on the compliance of the Proposed Project and related projects within the cultural resources cumulative study area with CEQA and RPO, and implementation of the project monitoring measures, the Proposed Project would not result in a significant contribution to cumulative impacts for the issue of cultural resources and impacts would be less than significant.

## **2.1.10.2.4 Significance of Impact Prior to Mitigation**

The following is a brief summary of all direct and indirect impacts which were determined to be significant by the analysis provided in the Cultural Resources Assessment (Appendix C).

### **2.1.10.12.2.4.1 Impacts to Historical Resources**

- CR-1 Historic resources, as defined in Section 15064.5 of the State CEQA Guidelines, located within open space would not suffer direct impacts from the Proposed Project. However, brushing and grading activities associated with the construction of the Proposed Project could result in the discovery of previously unrecorded, potentially significant historical resources. Impacts to such cultural resources are significant. Mitigation is required.
- CR-2 RPO-significant resources located in areas that are proposed for open space protection. 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. Impacts to such cultural resources would be significant.

### **2.1.10.22.2.4.2 Impacts to Archaeological Resources**

- CR-3 Historical/archaeological sites located in areas that are proposed for open space would not receive direct or indirect long-term impacts from the Proposed Project. However, brushing and grading activities associated with the construction of the Proposed Project could result in the discovery of previously unrecorded historical/archaeological resources. Impacts to such cultural resources would be 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 away from exposure to the elements.
- CR-5 All of the study's historical/archaeological and archaeological resources are assumed to be RPO-significant in the absence of testing; a few also assume significance in association with a historic ranching district. These resources are all located in areas proposed for open space protection and would not receive long-term direct and indirect impacts from the Proposed 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 archaeological resources. Impacts to such cultural resources would be significant.
- CR-6 None of the cultural resources identified on the Proposed Project Site contain human remains. However, brushing and grading activities associated with the construction of the Proposed Project could result in the discovery of previously unrecorded, potentially significant human remains. Impacts to such cultural resources would be significant.



## **2.1.11.2.2.5 Mitigation**

### **2.1.11.2.2.5.1 M-CR-1, M-CR-2, M-CR-3, M-CR-5, M-CR-6**

A monitoring program would be implemented for any grading or other ground-disturbing activity. The monitoring program would be required not only for ground-disturbing activities as part of the Tentative Map, but also any development that occurs subsequent to approval of the TM. The monitoring and data recovery program must be provided to the satisfaction of the Director of Planning and Development Services, and must include monitoring by a County-approved archaeologist and a Native American monitor. Appendix C provides details about the requirements of the monitoring program which address data discovery, recovery, and documentation; notes to the Grading Plan; and necessary sign-offs and documentation proving adherence to the program.

The archaeological consultant, County staff, and Native American representatives will work together to determine the disposition of any Native American cultural material collected, determining if some material would be repatriated rather than curated, taking into account the definitions under NAGPRA. Historic era cultural material collected would be curated.

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

The monitoring program and the fencing and signage plan designed for the Proposed Project as described above would effectively mitigate all impacts to below a level of significance because they would deter intrusions into protected areas. No further mitigation would be required.

### **2.1.11.2.2.5.2 M-CR-24**

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

## **2.1.12.2.6 Conclusion**

For the current study, a County-approved archaeological firm reviewed previous surveys and assessment reports, conducted site visits and limited testing, and updated the archaeological report for the Proposed Project.

Forty-five historic and archaeological resources were identified within the Proposed Project area. Thirty-three of these sites were recorded as prehistoric (pre-contact) Native-American sites, seven are historic period resources, and five sites include both historic and prehistoric material.

Impacts could occur during grading activities because additional resources may be uncovered. To avoid impacts to known and as-yet-undiscovered cultural resources during grading activities, an archaeological ~~and~~ Native American monitor is required to conduct archaeologicalgrading monitoring to ensure no additional resource areas are

damaged. Temporary fencing and signage would be installed to deter inadvertent intrusions to the open space by construction workers or equipment.

In the long-term, open space is an effective design feature because resources would be retained in an undisturbed state in a protected area.

Impacts to cultural resources are not significant because the project has avoided resources, fully mitigated impacts, and has provided open space protections for resources. One resource, CA-SDI-16,881/H, is eroding naturally, and would continue to do so after Project implementation. The Proposed Project would be required to implement a data recovery program which would mitigate for all impacts to this resource. Monitoring would ensure that unknown cultural resources would be adequately documented, and curated [or repatriated](#) if necessary, because monitors would halt grading and evaluate resources, if any are found.

Cumulative impacts are not significant because the Proposed Project and other cumulative projects have avoided or preserved resources on their sites. Impacts are mitigated to below a level of significance.

This page intentionally left blank

### Historical Resources (CEQA)

CA-SDI-16, <del>852H</del> <u>882H</u>	<del>Quarry site for mining red earth for bricks; no artifacts observed</del> <u>School site</u>
CA-SDI-16,853H	Scatter of sun-purple glass and porcelain
CA-SDI-16,871H	Mining pit, possibly looking for gold.
CA-SDI-19,345H	Three water troughs, rock wall to stabilize pad
P-37-025402	Starr Corral; unique construction from railroad boxcars
P-37-025435	Partial car body and association parts
P-37-030448	Historic water control features (rock walls) in main drainage and two minor cuts feeding the main drainage; connects with well at CA-SDI-16,863/H



### Historical Resources (RPO)

Resource #	Status of significance	Placed in Open Space
CA-SDI-16,853H	Assumed significant in the absence of testing.	Yes
CA-SDI-19,345H	Not individually significant, but part of a significant historic ranching district.	Yes
P-37-025402	Determined to be significant; also part of significant historic ranching district.	Yes
P-37-030448	Determined to be significant; also part of significant historic ranching district.	No

### Historical/Archaeological Resources (CEQA)

CA-SDI-7098H	Bedrock Milling Features (BMF) with ground stone, flaked stone, Tizon Brown Ware, and historic components of the McCain Residence homesite.
CA-SDI-16,863/H	This site includes a well at a natural spring and is part of the ranching features that are proposed as noncontiguous historic district, which would make them significant resources as defined by CEQA.
CA-SDI-16,881/H	BRMs and lithic scatter. Historic component: Late 19th century/early 20th century homestead site with landscape features, foundation, wall, trash dump, and scattered historic artifacts.
CA-SDI-16,882/H	Small lithic and pottery scatter. Historic component: site of early 20th century Orinoco School.
CA-SDI-19,344	BRMs with flakes, amethyst glass.

## Archaeological Resources (CEQA)

CA-SDI-7102	This is a large habitation site with a range of artifact types. The historical aspect of this site meets the criteria of CEQA and is eligible for listing in the California Register of Historical Resources.
CA-SDI-7103	BRMs along Orinoco Creek; flakes found at one feature.
CA-SDI-7104	BRMs; no artifacts observed.
CA-SDI-7105/7106	BRMs
CA-SDI-7109	This a large habitation site. The historical aspect of this site meets the criteria of CEQA and is eligible for listing in the California Register of Historical Resources.
CA-SDI-7110	Isolated scraper.
CA-SDI-16,851	BRMs with flake and Tizon Brown Ware.
CA-SDI-16,854	BRMs with ground stone, flakes, and hammerstones.
CA-SDI-16,855/ CA-SDI-16,856/ CA-SDI-16,857	BRMs with ground stone, flaked stone (including obsidian), Tizon Brown Ware, historics.
CA-SDI-16,858	BRMs with a mano.
CA-SDI-16,859	BRMs with a flake.
CA-SDI-16,860	BRMs, no artifacts observed.
CA-SDI-16,861	BRMs with flakes
CA-SDI-16,862	BRMs with a flake.
CA-SDI-16,864	MRMs with mano and Tizon Brown Ware.
CA-SDI-16,865	BRM with a flake.
CA-SDI-16,866	BRMs with a flake and Tizon Brown Ware.
CA-SDI-16,867	BRMs with no artifacts observed.
CA-SDI-16,868	BRMs with Tizon Flat Ware.
CA-SDI-16,869	BRM with no artifacts observed.
CA-SDI-16,870	BRMs with manos, flakes, and Tizon Brown Ware.
CA-SDI-16,872	BRMs with no artifacts observed.
CA-SDI-16,873	BRM with a flake.
CA-SDI-16,874	BRMs with no artifacts observed.
CA-SDI-16,875	BRMs with manos and Tizon Brown Ware.
CA-SDI-16,876/ CA-SDI-16,877	Lithic scatters and BRMs.
CA-SDI-16,878	Habitation debris, including flaked stone, Desert Side-Notched point, Tizon Brown Ware, Colorado Buff Ware, incised fired clay whale effigy.
CA-SDI-16,879	BRMs with no artifacts observed.
CA-SDI-16,880	BRM with Tizon Brown Ware.
CA-SDI-17,057	BRM with no artifacts observed.
CA-SDI-19,342	BRMs with flakes.
CA-SDI-19,343	BRMs with no artifacts observed.
CA-SDI-19,346	BRMs with no artifacts observed.

### **2.22.3 Traffic**

Traffic impact analysis was conducted by Arnold Torma of KOA Corporation, who is on the County-approved consultants list for the preparation of traffic analyses. The resulting report, entitled *Hoskings Ranch Traffic Impact Study TM5312*, dated September 2012, is included as Appendix D of the ~~DEIR~~FEIR. A memo updating agricultural traffic numbers was provided on November 14, 2014 and is included at Appendix H of that study.

#### **2.2.12.3.1 Existing Conditions**

The Proposed Project proposes the division of 1,416.5 acres into 24 agricultural lots ranging in size from 40.10 to 196.02 gross acres each and is located in the Julian Community Planning Area. The major roadways in the area are State Route 78/79 (SR 78/79) and Pine Hills Road. Hoskings Ranch Road and Daley Flat Road, private roads, also serve the site. Figure 2-3-1, "Existing Circulation Network," illustrates the local and regional circulation network near the Proposed Project Site.

The Proposed Project's frontage roads are: SR-78/79 and Pine Hills Road. Hoskings Ranch Road is an existing offsite road that was part of the analysis. Hoskings Ranch Road/Daley Flat Road and Orinoco Road are existing onsite private roads that were included in the analysis. The Proposed Project proposes four new private roads within its boundaries: Tenaya Road, Ute Peak Lane, Bear Run Lane, and Deer Run Lane.

The Proposed Project would take access to local roads via Hoskings Ranch Road onto SR-78/79 and onto Pine Hills Road via Tenaya Road.

SR 78/79 is a two-lane road with a posted speed limit of 55 mph. It has a Level of Service (LOS) E capacity of 16,200 Average Daily Trips (ADT), and currently carries 3,672 ADT east of Pine Hills Road. It was found to function at LOS B.

Pine Hills Road is a two-lane County-maintained road with an unposted speed limit of 55 miles per hour (mph). This road has an LOS E capacity of 16,200 ADT, and currently carries 1,651 ADT south of SR 78/79. It was found to function at LOS A.

Hoskings Ranch Road and Daley Flat Road are paved private roads. Hoskings Ranch Road at SR 78/79 is currently gated and has a phone box and key pad mechanism to provide access to residents and visitors. Levels of Service are not applicable to Hoskings Ranch Road and Daley Flat Road since their primary purpose is to serve abutting properties and not to carry through traffic.

Peak-hour intersection performance measures the length of delays at intersections when they are experiencing the highest volume of use. The three intersections with public roads closest to the Proposed Project are Hoskings Ranch Road/SR 78/79, Pine Hills Road/SR 78/79, and Pine Hills Road/Tenaya Road. All intersections currently operate at a LOS B or better.

#### **2.2.1.12.3.1.1 Regulatory Framework**

The study methodology and analysis for transportation is based on the County of San Diego Report Format and Content Requirements (Transportation and Traffic) and the County of San Diego Guidelines for Determining Significance (Transportation and Traffic).

The guidelines are used to determine the Proposed Project's conformance with the County of San Diego Public Road Standards, the San Diego County Standards for Private Streets Standards, and County of San Diego Public Facility Element policies



and evaluate whether a project's impacts are perceptible to the average driver. The issues under analysis are Level of Service (LOS) for road segments and intersections, and sight-distance.

### **2.2.22.3.2 Analysis of Project Effects and Determination as to Significance**

The traffic impact analysis is based on the County of San Diego, Report Format & Content Requirements: Transportation and Traffic and the County of San Diego, Guidelines for the Determination of Significance: Transportation and Traffic, dated February 2010.

County of San Diego daily traffic volume standards were used for the analysis of roadway segments. The Highway Capacity Manual analysis method was used for evaluating unsignalized intersections. Traffic count data was obtained from counts conducted in February 2010 and January 2011.

### **2.2.2.12.3.2.1 Project Trip Generation**

Trip generation is a measure or forecast of the number of trips that begin or end at the Proposed Project Site. All or part of these trips would result in traffic increases on the streets where they occur. The traffic generated is a function of the extent and type of development proposed for the site. The Proposed Project proposes agricultural activity which may result in 24 residences. Both activities would generate ADT.

Table 2-3-1 summarizes the trips generated by the Proposed Project:

**Table 2-3-1. Project Trip Generation**

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

Note: Numbers may not total due to rounding

As shown, a project of 24 residences would add 336-288 ADT to the circulation network, with 27-23 trips occurring during the AM peak hour, and 34-29 trips occurring during the PM peak hour. No peak hour agricultural traffic is anticipated as these activities take place at random times of the day and are not linked to rush hour traffic.

### **2.2.2.22.3.2.2 Project Trip Distribution**

Trip distribution identified the probable destinations, directions, or traffic routes that project-related traffic would likely affect. In this case, the Proposed Project trip distribution was estimated from observed traffic patterns and considerations of surrounding land uses. Figure 2-3-2, "Project Trip Distribution," shows the Proposed

Project trip generation. As shown, it is expected that ~~63-54~~ percent of traffic would use the Hoskings Ranch Road/Daley Flat Road exit, and ~~37-47~~ percent would use the Tenaya/Pine Hills ~~R~~road exit or their direct access onto Pine Hills Road, with ~~75~~ 65 percent of traffic ultimately driving toward Ramona, ~~24-30~~ percent toward Julian, and ~~four-five~~ percent toward the Pine Hills community.

### 2.2.2.32.3.2.3 **Road Segment Analysis**

The Existing Plus Project scenario reflects traffic volumes when expected Proposed Project traffic is added to existing traffic volumes. Table 2-3-2, "Existing Plus Project Roadway Segment Conditions," summarizes the existing roadway segments both with and without the Proposed Project.

#### Guidelines for the Determination of Significance

The Proposed Project would have a significant impact on road segments if:

- It would increase traffic by 200 ADT on an LOS E roadway, or if it would increase traffic by 100 ADT on an LOS F roadway.

#### Analysis

*Guideline 1: The project would have a significant effect on road segments if it would increase traffic by 200 ADT on an LOS E roadway, or if it would increase traffic by 100 ADT on an LOS F roadway.*

The results of the analysis are shown in Table 2-3-2. With the addition of Proposed Project traffic to existing traffic levels, roadway segments operate at LOS C or better both with or without the Proposed Project. Guideline 1 is not exceeded and impacts are not significant. Mitigation is not required.

### 2.2.2.42.3.2.4 **Peak Hour Intersection Performance Analysis**

#### Guidelines for the Determination of Significance

The Proposed Project would have a significant effect on intersections if:

- It exceeds specific thresholds on either an LOS E or an LOS F roadway. The specific thresholds for signalized and unsignalized intersections are:

**Table 2-3-3 Allowable Increase of Congested Intersections**

Intersection LOS	Signalized	Unsignalized
LOS E	Delay of 2 seconds	20 peak hour trips on a critical movement
LOS F	Delay of 1 second or 5 peak hour trips on a critical movement	5 peak hour trips on a critical movement

#### Analysis

*Guideline 2: The project would have a significant effect on intersections if it exceeds specific thresholds on either an LOS E or an LOS F roadway.*

The results of the analysis are shown in Table 2-3-4, "Existing Plus Project Intersection Conditions." All intersections operate at LOS B or better in both the morning and evening peak hours with or without the Proposed Project. Traffic is not

directed to roadways operating at either LOS E or F. Guideline 2 is not exceeded and impacts are not significant. Mitigation is not required.

#### **2.2.2.52.3.2.5 Hazards Due to an Existing Transportation Design Feature**

Increased traffic generated or redistributed by a proposed project may cause a significant traffic operational impact to an existing transportation design feature and could result in potential hazards.

##### **Guidelines for the Determination of Significance**

The Proposed Project would have a significant effect if:

- Design features/physical configurations of access roads may adversely affect the safe movement of all users along the roadway.
- The percentage or magnitude of increased traffic on the road due to the proposed project may affect the safety of the roadway.
- The physical conditions of the project site and surrounding area, such as curves, slopes, walls, landscaping or other barriers, may result in conflicts with other users or stationary objects.
- It does not conform with existing and proposed roads to the requirements of the private or public road standards, as possible.

##### **Analysis**

*Guideline 1: The project would have a significant traffic operational impact to an existing transportation design feature and result in potential hazards if its design features/physical configurations of access roads adversely impact the safe movement of all users along the roadway.*

*Guideline 3: The project would have a significant traffic operational impact to an existing transportation design feature and result in potential hazards if the physical conditions of the project site and surrounding area, such as curves, slopes, walls, landscaping or other barriers, may result in conflicts with other users or stationary objects.*

The San Diego County Standards for Private Roads defers to the American Association of State Highway and Transportation Officials (AASHTO) standards for stopping sight distance requirements. The standards used in this analysis were obtained from AASHTO's A Policy on Geometric Design of Highways and Streets (2004).

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

Sight distance is the continuous length of roadway visible to the driver sufficient enough to assess an oncoming vehicle to avoid collision and perform a maneuver without requiring through traffic to radically alter their speed. A speed survey was conducted for vehicles traveling northbound/southbound on Pine Hills Road and vehicles traveling eastbound/westbound on SR-78/79 at the Proposed Project access intersections; the analysis can be found in Appendix F of the traffic study. It was determined that the operational speed on Pine Hills Road at the Proposed

Project entry is 48 mph for northbound traffic and 47 mph for southbound traffic. For SR 78/79 at Hoskings Ranch road, the operating speed is 58 mph for both eastbound and westbound traffic. According to the County of San Diego Public Road Standards, the minimum intersection sight distance for 47, 48 and 58 mph are 470 feet, 480 feet and 580 feet, respectively. According to AASHTO, the minimum intersection sight distance for 43, 44 and 58 mph are 520 feet, 530 feet and 640 feet, respectively.

Table 2-3-5, "Existing Configuration Sight Distance Summary," summarizes the results of the sight-distance analysis for the Proposed Project access points, which are discussed below.

#### Corner Sight Distance

All movements have adequate corner sight distance except for:

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

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

From the Pine Hills Road looking right (Movement "B slows for A"), a distance of 580 feet of unobstructed visibility is required; the Proposed Project currently has 535 feet available. The sight distance is potentially restricted by the existing embankment on the south side of the horizontal curve in the road, as shown in the aerial photograph that is included in Figure 2-3-3, "Sight Distance Constraints." This may be acceptable because stopping sight distance is adequate for this maneuver. ~~However, A~~ adequate corner sight distance is potentially restricted by ~~can be met if the trees on the south side of the horizontal curve. -were trimmed or removed.~~ This would ~~be required as~~ a design consideration for the Proposed Project, and would reduce all impacts to not significant.

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

Figure 2-3-3, "Sight Distance Constraints," further analyzed these intersections by locating a spotter at the appropriate sight distance from the intersection. The graphic shows the spotter's orange vest is visible from all approaches, indicating that adequate sight distance exists. While there are no major obstructions, to maintain a conservative analysis, any vegetation that obstructs sight distance would be removed.

#### Stopping Sight Distance

All movements were determined to have adequate stopping sight distance.

Because the listed design considerations would reduce impacts to less than significant for corner sight distance, and because stopping sight-distance



requirements are met, guidelines 1 and 3 are not exceeded. No mitigation is required.

*Guideline 2: The project would have a significant traffic operational impact to an existing transportation design feature and result in potential hazards if the percentage or magnitude of increased traffic on the road due to the proposed project may affect the safety of the roadway.*

The Proposed Project's increased traffic on the road would not affect the safety of the roadway because the roadway would continue to function at a LOS A. Guideline 2 is not exceeded and impacts are not significant. Mitigation is not required.

*Guideline 4: The project would have a significant effect to an existing transportation design feature and result in potential hazards if it does not conform to existing and proposed roads to the requirements of the private or public road standards.*

The Proposed Project roads would be built to private road standards. Guideline 4 is not exceeded and impacts are not significant. Mitigation is not required.

### **2.2.2.6 2.3.2.6 Hazards to Pedestrians or Bicyclists**

Increased traffic generated or redistributed by a proposed project may cause a significant traffic operational impact to pedestrians or bicyclists and result in potential hazards.

#### **Guidelines for the Determination of Significance**

The Proposed Project would have a significant traffic operational impact on pedestrians or bicyclists considering the following factors:

- Design features/physical configurations on a road segment or at an intersection that may adversely affect the visibility of pedestrians or bicyclists to drivers entering and exiting the site, and the visibility of cars to pedestrians and bicyclists.
- The amount of pedestrian activity at the project access points that may adversely affect pedestrian safety.
- The preclusion or substantial hindrance of the provision of a planned bike lane or pedestrian facility on a roadway adjacent to the project site.
- The percentage or magnitude of increased traffic on the road due to the proposed project that may adversely affect pedestrian and bicycle safety.
- The physical conditions of the project site and surrounding area, such as curves, slopes, walls, landscaping or other barriers that may result in vehicle/pedestrian, vehicle/bicycle conflicts.
- Does not conform with existing and proposed roads to the requirements of the private or public road standards, as applicable.
- The potential for a substantial increase in pedestrian or bicycle activity without the presence of adequate facilities.

#### **Analysis**

*Guideline 1: The project would have a significant traffic operational impact on pedestrians or bicyclists if the design features/physical configurations on a road segment or at an intersection adversely affect the visibility of pedestrians or bicyclists*

*to drivers entering and exiting the site, and the visibility of cars to pedestrians and bicyclists.*

*Guideline 5: The project would have a significant effect if the physical conditions of the project site and surrounding area, such as curves, slopes, walls, landscaping or other barriers that may result in vehicle/pedestrian, vehicle/bicycle conflicts.*

As described in the analysis above, three sight-distance studies were performed at intersections at or near the Proposed Project. The analysis shows that corner sight-distance cannot currently be met in two instances:

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

Further analysis shown in Figure 2-3-3 shows that no major obstructions exist.

However, ~~the~~ vegetation which obstructs the view would be trimmed in order to provide the needed visibility. The Proposed Project is required to remove the vegetation in these two locations as design considerations. Therefore, no impacts are anticipated as a result. Guideline 1 is not exceeded. No mitigation is required.

*Guideline 2: The project would have a significant traffic operational impact on pedestrians or bicyclists if the amount of pedestrian activity at the project access points that may adversely affect pedestrian safety.*

Trails do not exist nor are proposed as part of the project. Therefore, pedestrian activity would be minimal. Additionally, due to the large scale of the Proposed Project lots, pedestrian traffic along the Proposed Project's access points is not likely to occur. Therefore, Guideline 2 is not exceeded and impacts are not significant. Mitigation is not required.

*Guideline 3: The project would have a significant traffic operational impact on pedestrians or bicyclists if the preclusion or substantial hindrance of the provision of a planned bike lane or pedestrian facility on a roadway adjacent to the project site.*

The Proposed Project would not hinder the improvement of existing roadways, including bike lanes, adjacent to the Proposed Project Site. Adequate right of way is being dedicated to allow the addition of bike lanes should they be required. No pedestrian facilities currently exist nor are any proposed on a roadway adjacent to the Proposed Project Site. Additionally, due to the large scale of the Proposed Project lots, pedestrian and bicycling traffic along the Proposed Project's frontage is not likely to occur. Guideline 3 is not exceeded and impacts are not significant. Mitigation is not required.

*Guideline 4: The project would have a significant traffic operational impact on pedestrians or bicyclists if the percentage or magnitude of increased traffic on the road due to the proposed project that may adversely affect pedestrian and bicycle safety.*

The Proposed Project's increased traffic on the road would not affect the safety of pedestrians or bicyclists because the roadway would continue to function at a LOS A. Guideline 4 is not exceeded and impacts are not significant. Mitigation is not required.

*Guideline 6: The project would have a significant traffic operational impact on pedestrians or bicyclists if does not conform with existing and proposed roads to the requirements of the private or public road standards, as applicable.*

Proposed Project entry would conform to private road standards. Guideline 6 is not exceeded and impacts are not significant. Mitigation is not required.

*Guideline 7: The project would have a significant traffic operational impact on pedestrians or bicyclists if the potential for a substantial increase in pedestrian or bicycle activity without the presence of adequate facilities.*

No increase in pedestrian or bicycle activity is anticipated; therefore, adequate facilities are not required. Due to the large scale of the Proposed Project lots, pedestrian and bicycling traffic along the Proposed Project's frontage is not likely to occur. Therefore, Guideline 7 is not exceeded and impacts are not significant. Mitigation is not required.

### **2.2.2.7 2.3.2.7 Project Access and Circulation**

#### **Guidelines for the Determination of Significance**

The Proposed Project would have a significant effect if:

- The sight-distance at any intersection used or proposed for project access does not meet minimum requirements established in the County of San Diego Public Road Standards for project access.

#### **Analysis**

*Guideline 1: The project would have a significant effect if the sight distance at any intersection used or proposed for project access does not meet minimum requirements established in the County of San Diego Public Road Standards for project access.*

The Proposed Project would take access to local roads at two points: Hoskings Ranch Road at SR 78/79, and Tenaya Road at Pine Hills Road (Tenaya Road is not yet built).

As described in both previous sections, the traffic study concludes that the two intersections which do not meet corner sight-distance can be modified, through vegetation removal to comply with sight-distance requirements. With these design considerations for the Proposed Project, no impacts are anticipated. Guideline 1 is not exceeded, and no mitigation is required.

### **2.2.32.3.3 Cumulative Impacts**

The Proposed Project generates 1,278 daily trips. Some of these trips would use roadways that were found in the course of the cumulative analysis to operate at inadequate levels of service. See the traffic impact report Appendix D for an analysis of cumulative impacts. The Proposed Project would therefore contribute to a significant cumulative impact (**Impact TR-1**) and mitigation is required.

#### **2.2.42.3.4 Significance of Impacts Prior to Mitigation**

##### **2.2.4.12.3.4.1 TR-1**

In the cumulative condition, the Proposed Project contributes vehicle trips to roadways that operate at inadequate levels of service. Impacts are significant and mitigation is required.

#### **2.2.52.3.5 Mitigation**

##### **2.2.5.12.3.5.1 M-TR-1**

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

#### **2.2.62.3.6 Conclusion**

Analysis of existing roadway segment and peak-hour intersection performance was conducted by a County-approved consultant. The analysis found that all roadway segments and intersections are currently operating a LOS C or better. The LOS for road segments and intersections would continue to operate at this level with the addition of project traffic. Impacts from Proposed Project traffic are not significant.

Corner sight-distance was found to be inadequate at two intersections.

For the left turn from Pine Hills Road onto SR-78/79, sight distance is restricted by the existing embankment on the south side of the horizontal curve in the road. This may be acceptable because stopping sight distance is adequate for this maneuver. However, adequate corner sight distance can be met if the trees on the south side of the horizontal curve were trimmed or removed.

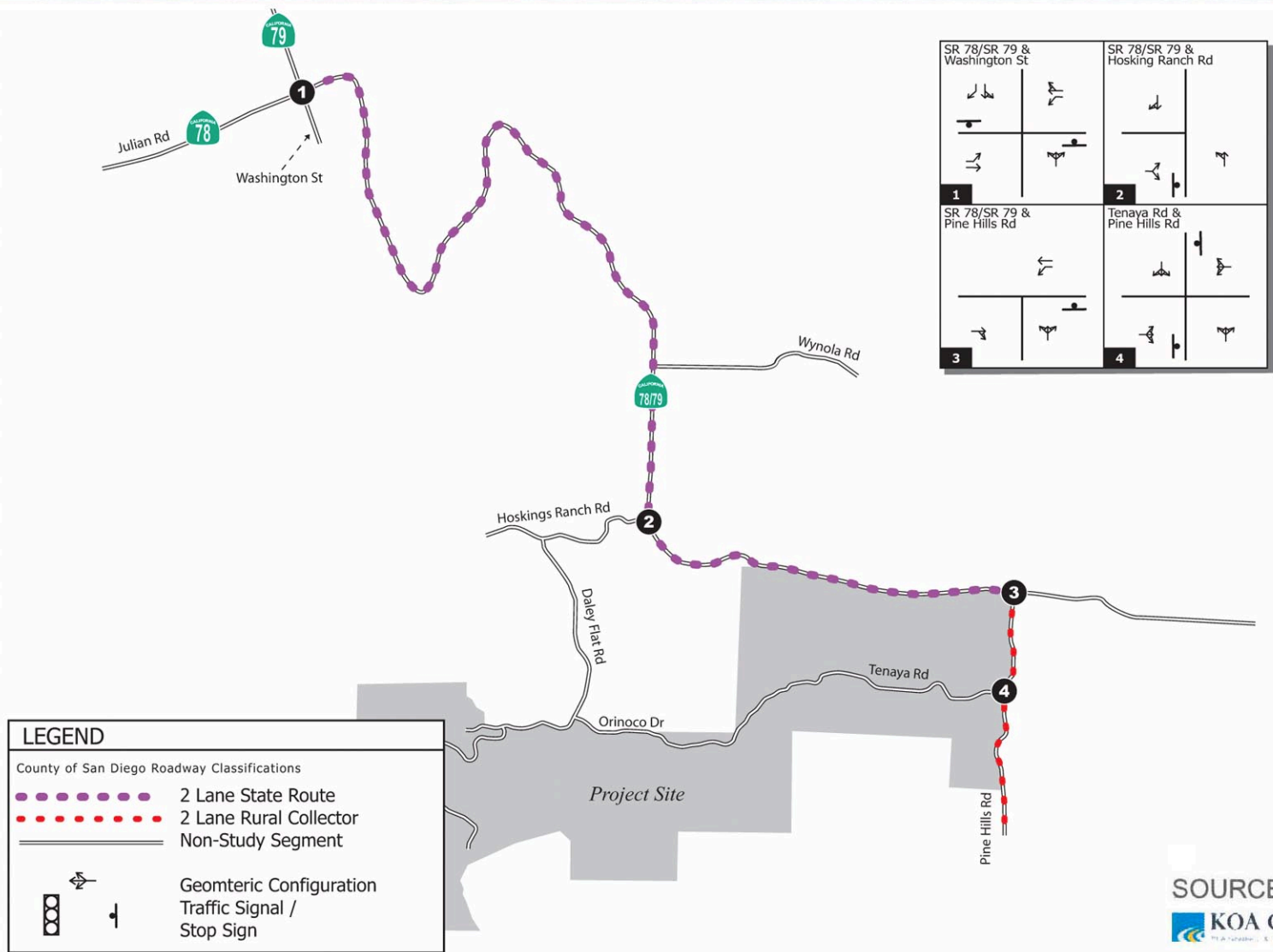
For the right turn from Tenaya Road onto Pine Hills Road, sight distance is restricted by trees on the west side of the horizontal curve in the road. However, adequate corner sight distance can be met if the trees on the west side of Pine Hills Road on/adjacent to the applicant's property were removed, allowing for corner sight distance to increase to 745 feet.

Vegetation removal in these two locations would be required as design considerations for the Proposed Project. No impacts are anticipated, and no mitigation required.

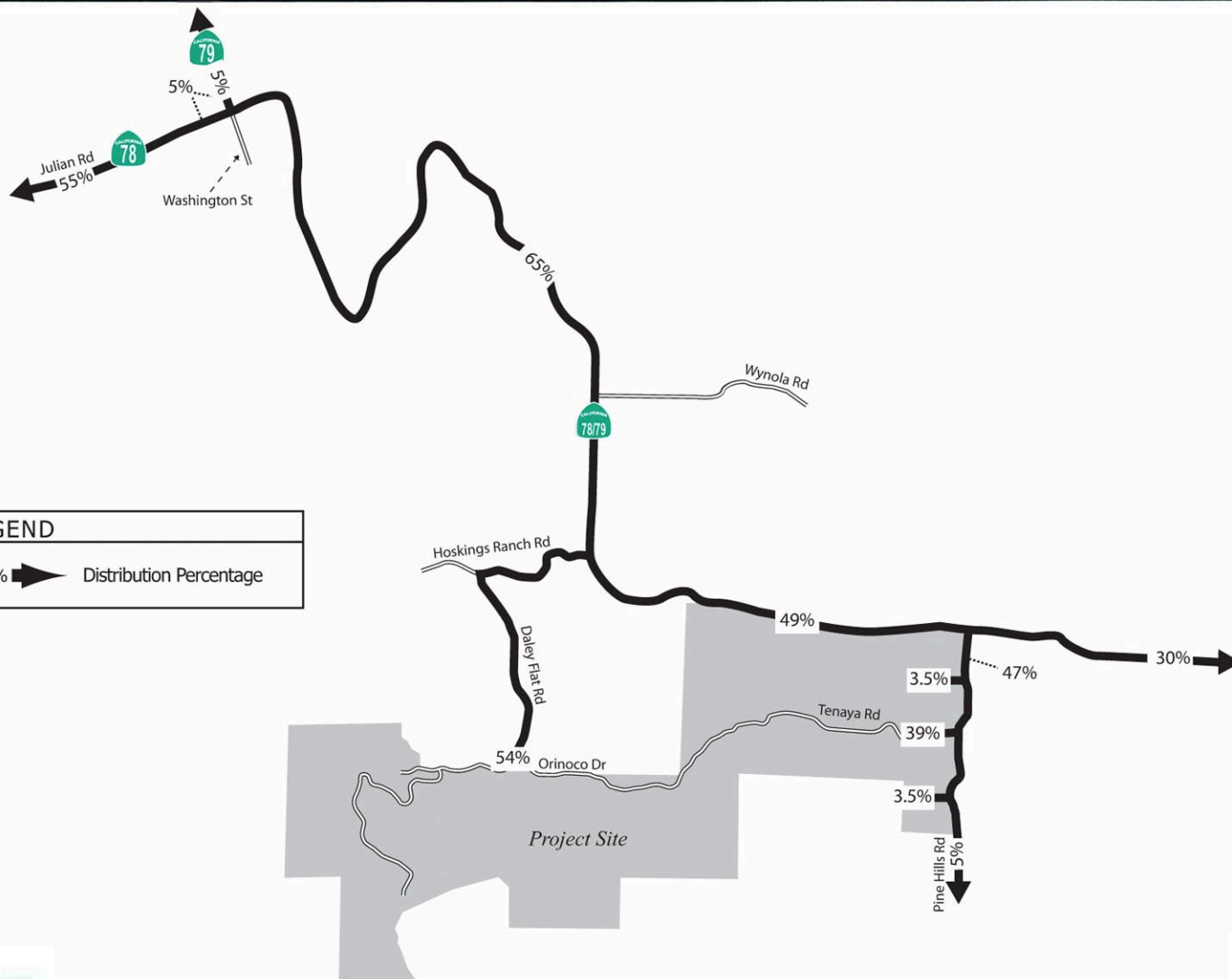
In the cumulative conditions, the Proposed Project contributes vehicle trips to roadways that operate at inadequate levels of service. Impacts from cumulative traffic are significant. The County of San Diego has adopted an overarching programmatic approach to address existing and projected future road deficiencies in the unincorporated area of San Diego County. This program includes the adoption of a Transportation Impact Fee (TIF) to fund improvements to roadways in order to mitigate potential cumulative impacts anticipated by traffic from future development. Mitigation in the form of a TIF fee would fully mitigate this impact because the fees would be used to improve area roadways where impacts occur to a level below significance.



This page intentionally left blank



Existing Circulation Network



**LEGEND**

■ 15% ➔ Distribution Percentage



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

Photo 1: "A" looking to "C"  
Minor Road vehicle looking to Major Road vehicle



Photo 2: "C" looking to "A"  
Major Road vehicle looking to Minor Road vehicle



Photo 1 (zoom): "A" looking to "C"  
Minor Road vehicle looking to Major Road vehicle



Photo 2 (zoom): "C" looking to "A"  
Major Road vehicle looking to Minor Road vehicle



Conceptual Layout of Clear Sight Triangle   Existing = 400 feet



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 "B"  
Minor Road vehicle looking to Major Road vehicle



Photo 2: "B" looking to "A"  
Major Road vehicle looking to Minor Road vehicle



Photo 1 (zoom): "A" looking to "B"  
Minor Road vehicle looking to Major Road vehicle



Photo 2 (zoom): "B" looking to "A"  
Major Road vehicle looking to Minor Road vehicle



Conceptual Layout of Clear Sight Triangle   Existing = 535 feet



Source: KOA



### Existing Plus Project Roadway Segment Conditions

Roadway Segment	Lanes/ Class	LOS E Capacity	Existing			Existing + Project			Δ Traffic	Δ v/c	Direct Impact?	CMP Impact?	
			ADT	V/C	LOS	ADT	V/C	LOS					
SR-78/79													
SR-79/Washington St to Hoskings Ranch	2SR	22,900	3,561	0.156	C	4,393	0.192	C	832	0.036	No	No	
Hoskings Ranch Rd to Pine	2SR	22,900	4,095	0.179	C	4,719	0.206	C	624	0.027	No	No	
Pine Hills Rd													
south of SR-78/79	2RC	16,200	1,651	0.102	A	2,243	0.138	B	592	0.037	No	No	

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



### Existing Plus Project Roadway Segment Conditions

**Table  
2-3-2**

### Existing Plus Project Intersection Conditions

Intersection	Peak Hour	Existing		Existing + Project		$\Delta$ Trips	$\Delta$ Delay	Direct Impact ?	CMP Impact ?
		Delay	LOS	Delay	LOS				
1. SR-78 & SR-79/Washington St <sup>1</sup>	AM	10.4	B	10.5	B	NA	0.1	No	No
	PM	13.0	B	13.2	B	NA	0.2	No	No
2. SR-78/79 & Hoskings Ranch Rd <sup>1</sup>	AM	9.0	A	9.7	A	NA	0.7	No	No
	PM	9.8	A	10.1	B	NA	0.3	No	No
3. SR-78/79 & Pine Hills Rd <sup>1</sup>	AM	10.1	B	10.3	B	NA	0.2	No	No
	PM	10.4	B	10.6	B	NA	0.2	No	No
4. Tenaya Rd & Pine Hills Rd <sup>1</sup>	AM	8.8	A	9.5	A	NA	0.7	No	No
	PM	8.6	A	9.5	A	NA	0.9	No	No

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

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



### Existing Plus Project Intersection Conditions

**Table  
2-3-4**

Maneuver	Prevailing Speed	Existing Sight Distance (feet)				
		Type	Evasive Action	Needed	Available	Adequate?
Hoskings Ranch Road / SR-78/79						
Left turn from Hoskings Ranch Road looking right	58 MPH	Corner	B slows for A	580* / 640**	710	Yes
		Stopping	B stops for A	540	585	Yes
Right turn from Hoskings Ranch Road looking left	58 MPH	Corner	C slows for A	580* / 640**	985	Yes
		Stopping	C stops for A	540	750	Yes
EB Through on SR-78/79 looking east	58 MPH	Corner	----	----	----	----
		Stopping	B stops for D	540	750	Yes
Pine Hills Road / SR-78/79						
Left turn from Pine Hills Road looking right	58 MPH	Corner	B slows for A	580* / 640**	535	No
		Stopping	B stops for A	540	950	Yes
Right turn from Pine Hills Road looking left	58 MPH	Corner	C slows for A	580* / 640**	750	Yes
		Stopping	C stops for A	540	750	Yes
EB Through on SR-78/79 looking east	58 MPH	Corner	----	----	----	----
		Stopping	B stops for D	540	750	Yes
Tenaya Road / Pine Hills Road						
Left turn from Tenaya Road looking right	48 MPH	Corner	B slows for A	440* / 530**	665	Yes
		Stopping	B stops for A	400	670	Yes
Right turn from Tenaya Road looking left	47 MPH	Corner	C slows for A	430* / 520**	400	No
		Stopping	C stops for A	385	745	Yes
SB Through on Pine Hills Road looking south	47 MPH	Corner	----	----	----	----
		Stopping	B stops for D	385	725	Yes

\* Per County of San Diego guidelines

\*\* Per AASHTO guidelines



## Existing Configuration Sight Distance Summary

**Table  
2-3-5**

## CHAPTER 2.0    **SIGNIFICANT ENVIRONMENTAL EFFECTS OF THE PROPOSED PROJECT**

### **2.1    Biology**

Biological surveys of the site were conducted by REC Consultants, Vincent Scheidt, and others during various periods from May 2002 through ~~May 2010~~ 2014. These surveys are included in the most recent study, "A Biological Resources Survey Report for the Hoskings Ranch Project, TM 5312 RPL<sup>3</sup>, and Consolidated Project Alternative Log No. 03-10-005 County of San Diego," revised ~~July 2013~~ June 2014, attached to this ~~DEIR~~ FEIR as Appendix A.

#### **2.1.1    Existing Conditions**

The topography of the 1,416.5-acre subject property slopes gently to steeply, dropping off from flatter areas near the north and east portions of the site to the lower elevations to the west and south. A number of dirt roads cross the property, with access currently provided from SR 78/79, Daley Flat Road, and Forest Service roads through Daley Flat. There are no residences on the site and the only structures present are capped wells, four man-made detention basins, fences, and a cattle loading corral. The lowest portions of the site have supported occasional agriculture (livestock grazing) in the past. The habitats onsite consists of chaparrals, scrubs, woodlands, herbaceous uplands, wetlands, and unvegetated habitats. Elevations onsite range from approximately 3,100 to 4,200 feet MSL. Soil types found onsite consist of sandy loams and alluvial soils.

There are seventeen generally discrete subcategories of plant communities found onsite. They are as follows: (1) Southern Mixed Chaparral, (2) Chamise Chaparral), (3) Diegan Coastal Sage Scrub, Inland Form, (4) Flat-top Buckwheat, (5) Coastal Sage – Chaparral Scrub, (6) Coast Live Oak Woodland, (7) Engelmann Oak Woodland, (8) Mixed Oak Woodland, (9) Mixed Oak/Coniferous/Bigcone/Coulter, (10) Non-native Grassland, (11) Montane Meadow, (12) Southern Coast Live Oak Riparian Forest, (13) Open Water, (14) Coastal and Valley Freshwater Marsh/Emergent Wetland, (15) Riparian Scrub, (16) Disturbed Wetland, and (17) Urban/Developed Habitat. Habitats which comprise the general 'Scrub' category (including many of the soft-woody species above) may also qualify as Sensitive Habitat Lands as defined by the RPO. For analysis purposes, all areas of Scrub onsite are classified as 'CSS' pursuant to the County's Habitat Loss Permit (HLP) Ordinance.

These biological resource areas are depicted on Figures 2-1-1A, B, and C, "Biological Resources Map – West," "Biological Resources Map – Central," and "Biological Resources Map – East," respectively, at the end of this chapter in 11x17 format, and in larger format in the back pocket of this ~~DEIR~~ FEIR. Existing open space easements have been mapped to show the biological resources currently under protection, as shown in Figure 2-1-2, "Existing Open Space Easements and Associated Biology."

The following subsection provides relevant data for the onsite habitats. Table 3 in the biological resources report summarizes the data for each of these habitats.

##### **2.1.1.1    Sensitive Habitats**

Sensitive Habitats on the site total approximately 1,416.5 acres and are discussed below. An additional 0.8 acres of urban/developed land occurs on the site but is not discussed here because it is not a sensitive habitat.



Southern Mixed Chaparral (117.5 acres) and Chamise Chaparral (96.9 acres)

Chaparral habitat composition varies greatly depending on factors such as slope and surface. Chaparral vegetation occurs in patches throughout the Project Site in the dry upland areas. Southern Mixed Chaparral is found in sheltered locations and on slope surfaces sustaining moderate amounts of moisture. Chamise Chaparral is found in areas characterized by small amounts of moisture and nutrient-poor slopes. Chaparral indicator species include Chamise, Whitebark Ceanothus, Mountain Mahogany, Mariposa Lily, Chaparral Bird's Beak, and other species. South-facing slopes support significantly more open chaparral with lower stature shrubs.

Diegan Coastal Sage Scrub, Inland Form (40.6 acres), Flat-top Buckwheat (71.4 acres), and Coastal Sage-Chaparral Scrub (38.3 acres)

Scrub vegetation is found in older disturbed areas that have regrown with various shrubs and subshrubs, including Flat-top Buckwheat, Slender Sunflower, and other soft-woody species. Diegan Coastal Sage Scrub is indicated by California Sagebrush, Flat-top Buckwheat, and other species. The site supports a nearly pure stand of Flat-top Buckwheat, with few other species in the area. Coastal Sage-Chaparral Scrub includes Chamise, Flat-top Buckwheat, and other native species. Most of the scrub habitats are found in areas that were also used by humans, including prehistoric uses around some of the site's larger rock outcrops.

Coast Live Oak Woodland (175.8 acres), Engelmann Oak Woodland (246 acres), Mixed Oak Woodland (115 acres), and Mixed Oak/Coniferous/Bigcone/Coulter (8.7 acres)

Woodlands occupy large areas of the Project Site. Coast Live Oak Woodland is indicated by mature Coast Live Oak trees over a mixed understory including Ripgut Brome, Western Goldrod, Squaw Bush, and many others. Engelmann Oak Woodland is indicated by mature and often large Engelmann Oaks over a similar understory. Broad savannahs of Engelmann Oak Woodland are found in various places onsite. Mixed Oak Woodland contains a variety of oaks, including Black Oaks and other native species. Mixed Oak/Coniferous/Bigcone/Coulter is indicated by oaks and various conifers, including Incense Cedar and Coulter Pine.

Non-native Grassland (375.8 acres) and Montane Meadow (76.3 acres)

Herbaceous upland vegetation covers most of the flatter areas on the property that were at one time grazing pastures. Non-native Grassland indicators include Ripgut Brome, Wild Oat, and Perennial Mustard. Montane Meadow indicators include Blessed Thistle, Rush, and other native species.

Southern Coast Live Oak Riparian Forest (49.53 acres), Riparian Scrub (3.2 acres), Open Water (0.07 acres), Coastal and Valley Freshwater Marsh/Emergent Wetland (0.85 acres), and Disturbed Wetland (0.07 acres)

Southern Coast Live Oak Riparian Forest is indicated by large trees including California Sycamores, willows, Cost Live Oak, and others along the site's main drainages. Riparian Scrub includes scrubby willows, cattails, and Mule Fat, and is found in openings along several of the site's drainages. Open Water is characterized by four agricultural ponds onsite, which were constructed for cattle watering. Only one or two hold water beyond the rainy season and have become well vegetated over time. These ponds support Emergent Wetland, Coastal and Valley Freshwater

Marsh, and Disturbed Wetland. A wetland delineation was done for the Proposed Project and the results are shown on Figure 2-1-3, "Wetland Delineation."

### 2.1.1.2 *Sensitive Plant and Animal Species*

The property was surveyed for special status plant species and animals. Special status plant species and animals are those listed as "rare, endangered, threatened, of special concern" or "otherwise noteworthy" by the California Department of Fish and Game, the U.S. Fish and Wildlife Service, the National Audubon Society, the County of San Diego's MSCP program, the California Native Plant Society, or other conservation agencies, organizations, or local botanists or zoologists. Of the 286 species of vascular plants observed, the following six are considered sensitive: San Diego Milk-vetch, Banner Dudleya, San Diego Gumplant, Cuyamaca Meadowfoam, Engelmann Oak, and Velvety False Lupine. Where applicable, CNDDDB forms for each of the observed special status plant species were completed and provided in attachment to the Biology report in Appendix A. One hundred and thirty-one species of animals were observed, with 27 species considered sensitive. These include: Grasshopper Sparrow, Golden Eagle, Great Blue Heron, Red-shouldered Hawk, Swainson's Hawk, Green Heron, Turkey Vulture, Northern Harrier, White-tailed Kite, California Horned Lark, Blue-gray Gnatcatcher, Western Bluebird, Bewick's Wren, Barn Owl, Mountain Lion, Bobcat, San Diego Desert Woodrat, Mule Deer, Silvery Legless Lizard, Southwestern Pond Turtle, Orange-throated Whiptail, San Diego Ringneck Snake, Two-striped Garter Snake, San Diego Horned Lizard, Coronado Skink, Coastal Western Whiptail, and Monarch butterfly.

### 2.1.1.3 *Threatened or Endangered Species*

#### California Gnatcatcher

The California Gnatcatcher is a federally-listed "threatened" songbird, and has been found on habitat superficially similar to that found on the Project Site. The California Gnatcatcher is a federally-listed "threatened" songbird, and has been found on habitat superficially similar to that found on the Project Site. However, the scrub habitat on the Proposed Project site is previously disturbed. Additionally, the California Gnatcatcher is usually found on sites with elevations below 1,800 feet MSL, and the Project Site ranges from 3,100 and 4,200 feet MSL. And lastly, there are no locality records for this species from the vicinity, with the nearest sighting several miles to the west at lower elevations. For these reasons, the California Gnatcatcher is not expected to occur on this property.

#### Laguna Mountains Skipper

The Laguna Mountains Skipper is oftentimes found in higher elevation areas of San Diego County. Since it is a federally-listed "endangered species," directed surveys were conducted in 2002 and 2008. The Laguna Skipper larva feeds solely on the *Horkelia clevelandii* plant, which makes the presence or absence of this plant the determining factor for the existence of the Laguna Skipper. The directed surveys of the site did not find any *Horkelia clevelandii*; therefore, the Laguna Mountains Skipper is not expected to occur on the Proposed Project site.

#### Stephen's Kangaroo Rat

Stephen's Kangaroo Rat is a State and Federally-listed "Threatened Species". This secretive, nocturnal mammal is known to occur in open habitats dominated by low forbs such as Red-stem Filaree (*Erodium cicutarium*) with scattered, low perennial

shrubs, including Flat-top Buckwheat (*Eriogonum fasciculatum*), California Sagebrush (*Artemisia californica*), and others. This species is known to be sensitive to "edge effects", and their survival is dependent on a habitat containing appropriate soil for burrowing, open spaces for foraging and breeding, and the appropriate mix of annual forbs to annual grasses. Field surveys in May 2014 concluded that SKR does not occur on the Proposed Project site.

#### **2.1.1.4 Regulatory Framework**

##### California Environmental Quality Act (CEQA)

California Public Resources Code, Section 21000, et seq., constitutes CEQA. This Act legislates environmental protections, encoding guidelines and definitions that guide agencies in directing projects to have the least environmental impacts.

##### California Endangered Species Act (CESA)

California Fish and Game code, Section 2050, et seq., constitutes CESA. This Act legislates the protection of endangered species, calling for conservation and mitigation programs, and providing definitions for various terms, including the term 'endangered' and/or 'threatened', which guide the Act's enforcement.

##### Code of Federal Regulations (CFR)

CFR Section 21, et seq., constitutes the Migratory Bird Treaty Act (MBTA), which provides protections for migratory birds. Specific provisions of the statute include:

"Establishment of a Federal prohibition, unless permitted by regulations, to "pursue, hunt, take, capture, kill, attempt to take, capture or kill, possess, offer for sale, sell, offer to purchase, purchase, deliver for shipment, ship, cause to be shipped, deliver for transportation, transport, cause to be transported, carry, or cause to be carried by any means whatever, receive for shipment, transportation or carriage, or export, at any time, or in any manner, any migratory bird, included in the terms of this Convention . . . for the protection of migratory birds . . . or any part, nest, or egg of any such bird." (16 U.S.C. 703)"

##### Federal Endangered Species Act (FESA)

Title 16 of the United States Code Section 1531, et seq., constitutes the Federal Endangered Species Act. FESA declares the U.S.'s concerns about endangered species, provides definitions for various terms, including the term 'endangered' and/or 'threatened', and directs the states to protect endangered species through conservation programs and the like. FESA Section 10(a)(2) provides for a Habitat Conservation Plan (HCP), which is a mandatory component of an incidental take permit for a project with no Federal nexus for a listed species, designed to minimize and mitigate the authorized take of the species. Section 7 of FESA provides for legal incidental take, or a take which is incidental to the pursuit of an otherwise legal activity. Section 7 also requires that all federal agencies consult with USFWS to insure that their actions are not likely to jeopardize the continued existence of Listed Species or result in destruction or adverse modification of critical habitat.

##### Natural Community Conservation Plan Act (NCCPA)

California Fish and Game Code Section 2400-2435 constitutes the NCCPA, which provides the mechanism for permitting the take of wildlife when conditions are met to the satisfaction of the agencies under an approved plan. The Permit issued in accordance with the implementing agreement allows the take of identified species,

including rare species, species listed under CESA as threatened or endangered, species that are candidates for listing, and unlisted species.

Pre-Approved Mitigation Area (PAMA) are a function of the NCCPA. These are lands that have been identified through an extensive computer modeling process and independent scientific review as being of high biological importance. PAMA lands are “pre-approved” as being suitable for conservation.

#### Resource Protection Ordinance (RPO)

San Diego County Ordinance No. 9842 constitutes the RPO, which lists provisions relative to wetlands, prehistoric and historic sites, agricultural operations, enforcement, and other matters.

### **2.1.2 Analysis of Project Effects and Determination as to Significance**

All plants, animals, and habitats encountered during survey periods were noted in the field. The limits of each habitat-type were mapped in the field utilizing an aerial photograph of the property. All plants and animals identified in association with the property are listed in Tables 8 and 9 of Appendix A. Wildlife observations were made opportunistically. Binoculars were used to aid in observations and all wildlife species detected were noted. Several directed field surveys and habitat evaluations were conducted in conjunction with the biological survey of the property, including an Arroyo Toad field survey, a Quino Checkerspot Butterfly survey, a wetland survey, habitat evaluations for various sensitive species known from the vicinity, and a spring rare plant survey (see Figure 2-1-4, “Rare Plant Survey”). Each survey complied with approved protocols to maximize detection of the respective biological resources, if present.

All potential Project-related effects were evaluated using the guidelines for significance. Potential offsite impacts that could arise from sight-distance requirements were reviewed. It appears that site-distance requirements can be met by trimming existing trees. This trimming can take place without harming the existing trees, and therefore no offsite impacts are associated.

The development area of the site, which includes all pads, roads, fire clearing, and other improvements, totals ~~206.9201.9~~ acres, or just under 15 percent of the site. The remainder of the site (~~1,209.81,214.8~~ acres, or just over 85 percent of the site) would be preserved in dedicated biological open space, a portion of which (approximately 880 acres) would allow grazing. The onsite open space consists entirely of open space; however all of this open space would be protected under a dedicated Biological Open Space or Conservation Easement to be managed in perpetuity. Additional protections for the open space are provided by a Resource Management Plan, provided in the biological resources report included as Appendix A, and a Conservation Grazing Management Plan (CGMP).

The open space is provided as mitigation for project impacts, as detailed below.

Certain areas of the site are considered ‘impact-neutral’. These are areas that are avoided by ordinance, and therefore cannot be used to offset Proposed Project impacts. These ‘impact neutral’ areas are potentially subject to edge effects, although the low-density design of the Proposed Project, and the management of the open space through the CGMP would minimize these effects.

~~The 5-acre portion of the property proposed for dedication to the fire department is included in the ‘impact neutral’ category; any future development of this property would be subject to subsequent environmental review.~~



The Proposed Project also includes an existing 1.6-acre road easement to be realigned within Lot 10. No action to design or permit any facility or related improvements is being undertaken as part of the current application, although potential future impacts, assuming full site development, are evaluated in the biological analysis.

Guidelines for significance were determined using appropriate provisions of the San Diego County Guidelines for Determining Significance and Report Format: Biological Resources. In addition, County of San Diego staff provided further consultation in the formulation of guidelines.

#### **2.1.2.1 Special Status Species**

##### Guidelines for the Determination of Significance

A significant impact to biological resources would occur if:

1. The Proposed Project would impact one or more individuals of a species listed as federally or state endangered or threatened.
2. The Proposed Project would impact the regional long-term survival of a County Group A or B plant species, or a County Group I animal species, or a species listed as a state Species of Special Concern.
3. The Proposed Project would impact the regional long-term survival of a County Group C or D plant species or a County Group II animal species.
4. The Proposed Project may impact Arroyo Toad aestivation or breeding habitat.
5. The Proposed Project would impact Golden Eagle habitat.
6. The Proposed Project would result in a loss of functional foraging habitat for raptors.
7. The Proposed Project would increase noise and/or nighttime lighting to a level above ambient proven to adversely affect sensitive species.
8. The Proposed 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.
9. The Proposed Project would increase human access or predation or competition from domestic animals, pests or exotic species to levels that would adversely affect sensitive species.
10. The Proposed Project would impact nesting success of sensitive animals through grading, clearing, modification, and/or noise generating activities such as construction.

##### Analysis

The Proposed Project would result in direct and indirect impacts to special status species that are less than significant pursuant to the above significance guidelines.

*Guideline 1: The project would impact one or more individuals of a species listed as federally or state endangered or threatened.*

The Proposed Project would indirectly impact Swainson's Hawk, a state-listed Threatened Species, and Cuyamaca Meadowfoam, a state-listed Endangered Species. Indirect impacts to Swainson's Hawk would include impacts to foraging habitat for this species. However, at least 90 percent of this species' habitat would be preserved onsite. The entire onsite population of Cuyamaca Meadowfoam would be protected in open space. However, in the absence of protective measures, the onsite population of Cuyamaca Meadowfoam could be impacted by edge effects. Guideline 1 is exceeded, impacts are significant. Mitigation is required. **(Impact BI-1)**

*Guideline 2: The project would impact the regional long-term survival of a County Group A or B plant species, or a County Group I animal species, or a species listed as a state Species of Special Concern.*

The Proposed Project would directly impact San Diego Gumplant, Two-striped Garter Snake, and Large-blotched Salamander, all of which are County Group A or B plant species, County Group I animal species, or state Species of Special Concern. However, these impacts would not affect the long-term regional survival of any of these species because ample habitat that supports these species is preserved on site and in the region. At least 85 percent of the Gumplant's habitat, 99 percent of the Garter Snake's habitat, and at least 85 percent of the Large-blotched Salamander habitat would be preserved onsite. Section 3.1.B of the biology report provides additional details.

Although the Proposed Project would indirectly impact Velvety False Lupine, 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, all of which are County Group A or B plant species, County Group I animal species, or state Species of Special Concern, these impacts are relatively minor in consideration of the amount of habitats supporting these species that would be preserved. Eighty-five percent and higher of these supporting habitats would be retained in permanent open space by the Proposed Project.

These direct and indirect impacts 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. Either the entire populations, or a vast majority of those populations, of the habitats supporting these species would be preserved onsite. Section 3.1.B of the biology report provides additional details.

Because the Proposed Project would result in direct and indirect impacts, Guideline 2 is exceeded and impacts are significant. Mitigation is required **(Impact BI-2)**.

*Guideline 3: The project would impact the regional long-term survival of a County Group C or D plant species or a County Group II animal species.*

The Proposed Project would directly impact Banner Dudleya, Engelmann Oak, San Diego Desert Woodrat, Silvery Legless Lizard, Orange-throated Whiptail, San Diego Ringneck Snake, Coronado Skink, San Diego Horned Lizard, Coastal Western Whiptail, Coastal Rosy Boa, San Diego Mountain Kingsnake, and Northern Red Diamond Rattlesnake, all of which are County Group C or D plant species or County Group II animal species. However, these impacts 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. The analysis determined that 81 percent of the onsite Engelmann Oak population, and 95 percent of the Banner

Dudleya population would be preserved onsite. For all the remaining species listed, at least 90 percent of each population and the associated habitats would be preserved. Section 3.1.C, page 55, of the biology report provides additional details.

The Proposed Project would indirectly impact Great Blue Heron, Green Heron, [California](#) Horned Lark, Western Bluebird, Barn Owl, Mountain Lion, Mule Deer, and Monarch Butterfly, all of which are County Group C or D plant species or County Group II animal species. The analysis determined that at least 83 percent of each population and the associated habitats would be preserved. Section 3.1.C, page 55, of the biology report provides additional details.

These direct and indirect impacts 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. The analysis has determined that the majority of the habitat supporting each of the listed species would be preserved. Section 3.1.C, page 56, of the biology report provides additional details.

Because the Proposed Project would result in direct and indirect impacts, Guideline 3 is exceeded and impacts are significant. Mitigation is required (**Impact BI-3**).

*Guideline 4: The project may impact Arroyo Toad aestivation or breeding habitat.*

Arroyo Toad aestivation or breeding habitat is not found on this site. Therefore the guideline does not apply.

*Guideline 5: The project would impact Golden Eagle habitat.*

The Proposed Project could directly impact Golden Eagle foraging habitat because it would result in the loss and habitat fragmentation of [206.9201.9](#) acres of golden eagle foraging habitat. Golden Eagle nesting habitat is not present onsite.

This wide-ranging species is known to forage onsite and nest in the Cleveland National Forest.

CEQA requires the assumption that birds could nest in any of the development area, and therefore all [206.9201.9](#) acres in the development area are considered potential avian nesting areas. This includes shrub, tree, and ground nesting species. The reader is referred to Table 2-1-1, "Biological Impact Table," for the listing of all habitat impacts, mitigation ratios required for each habitat, and mitigation acreage provided in open space protection by the Proposed Project.

Golden Eagle is declining in San Diego County and is highly sensitive to human activity. On-going management is required to protect foraging activities on an on-going basis. Guideline 5 is exceeded and impacts are significant. Mitigation is required. (**Impact BI-4**)

*Guideline 6: The project would result in a loss of functional foraging habitat for raptors.*

Raptor foraging habitat is generally located in upland grassland areas. The Proposed Project would result in the loss of up to [206.9201.9](#) acres of potential foraging habitat due to direct impacts from development for the site's resident and potentially-resident raptor species, including Golden Eagle, Swainson's Hawk, Red-shouldered Hawk, and White-tailed Kite.

CEQA requires the assumption that birds could nest in any of the development area, and therefore all [206.9201.9](#) acres in the development area are considered potential avian nesting areas. This includes shrub, tree, and ground nesting species. The

reader is referred to Table 2-1-1 for the listing of all habitat impacts, mitigation ratios required for each habitat, and mitigation acreage provided in open space protection by the Proposed Project.

The loss of [206-9201.9](#) acres of potential foraging habitat is significant. Guideline 6 is exceeded and impacts are significant. Mitigation is required (**Impact BI-5**).

*Guideline 7: The project would increase noise and/or nighttime lighting to a level above ambient proven to adversely affect sensitive species.*

The Proposed Project would not increase noise and/or nighttime lighting to a level that has been proven to adversely affect sensitive species because Project density is very low (0.02 dwelling units per acre). Minimum lot size is 40 acres, so noise or lighting effects would be dispersed. Additionally, the Proposed Project would conform to the Dark Sky Ordinance. Guideline 7 is not exceeded and impacts are not significant. No mitigation is required.

*Guideline 8: 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 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. 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 [1,209-81,214.8](#) acres of managed biological open space easements. County guideline 3.1.A states that "alteration of any portion of a core habitat could only be considered less than significant if a biologically-based determination can be made that the project would not have a substantially adverse effect on the core area and the species it supports". Because the 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.

*Guideline 9: The project would increase human access or predation or competition from domestic animals, pests or exotic species to levels that would adversely affect sensitive species.*

The Proposed Project would increase human access or predation or competition from domestic animals, pests or exotic species to levels that would adversely affect special status species. Open space is protected with easements, fencing and/or signage, as needed. Ongoing management is needed, however, to ensure protections are provided in perpetuity. Guideline 9 is exceeded and impacts are significant. Mitigation is required. (**Impact BI-6**)

*Guideline 10: The project would impact nesting success of sensitive animals through future grading, clearing, modification, and/or noise generating activities, such as construction.*

The conversion of [206-9201.9](#) acres of the site that are currently in a natural, mostly undisturbed state to a development which includes homes and agriculture would impact the nesting success of the special status species present on the site.



The reader is referred to Table 2-1-1 for the listing of all habitat impacts, mitigation ratios required for each habitat, and mitigation acreage provided in open space protection by the Proposed Project.

Guideline 10 is exceeded and impacts are significant. Mitigation is required. (**Impact BI-7**)

### **2.1.2.2 *Riparian Habitats (Including State and County Wetlands and “Waters”) or Sensitive Natural Community***

#### Guidelines for the Determination of Significance

The determination of impact significance is based on the following guidelines:

1. Project-related construction, grading, clearing, or other activities would temporarily or permanently remove sensitive native or naturalized habitat on or off the Project Site.
2. Any of the following would occur to or within jurisdictional wetlands and/or riparian habitats as defined by the State, CRWQCB and CDFW, or the County of San Diego RPO: removal of vegetation; grading; obstruction or diversion of water flow; adverse change in velocity, siltation, volume of flow; obstruction or diversion of water flow; adverse change in velocity, siltation, volume of flow, or runoff rate; placement of fill; placement of structures; construction of a road crossing; placement of culverts or other underground piping; any disturbance of the substratum; and/or any activity that may cause an adverse change in native species composition, diversity and abundance.
3. The project would draw down the groundwater table to the detriment of groundwater-dependent habitat, typically a drop of 3 feet or more from historical low groundwater levels.
4. The project would increase human access or competition from domestic animals, pest or exotic species to levels proven to adversely affect sensitive habitats.
5. The project does not include a wetland buffer adequate to protect the functions and values of existing wetlands.

#### Analysis

The Proposed Project is projected to cause direct impacts and indirect long-term impacts to riparian habitats or other sensitive natural communities under the stated guidelines.

*Guideline 1: Project-related construction, grading, clearing, construction or other activities would temporarily or permanently remove sensitive native or naturalized habitat on or off the project site.*

Project-related future construction, grading, clearing, or other activities would permanently remove sensitive native or naturalized habitat on the Proposed Project Site. The Proposed Project preserves large blocks of habitat in order to preserve wildlife corridors along many of the site's drainages, and all of the regional wildlife corridor along Orinoco/Temescal Canyon Creek and the southern portions of the site. The Proposed Project would not create artificial wildlife corridors that do not follow natural movement patterns.

Direct onsite impacts include 12.6 acres of Southern Mixed Chaparral which requires 6.3 acres for mitigation at a ratio of 0.5:1; 0.8 acres of Chamise Chaparral which requires 0.4 acres for mitigation at a ratio of 0.5:1; 3.8 acres of Diegan Coastal Sage Scrub, Inland Form which requires 7.6 acres for mitigation at a ratio of 2:1, 12.8 acres of Flat-top Buckwheat which requires 25.6 acres for mitigation at a ratio of 2:1; 4.6 acres of Coast Live Oak Woodland which requires 13.8 acres for mitigation at a ratio of 3:1; 43.7 acres and 2.2 acres from open space easement vacation of Engelmann Oak Woodland, which requires 144.3 acres total for mitigation at ratios of 3:1 and 6:1 for the two respective impact types; 15.3 acres of Mixed Oak Woodland which requires 45.9 acres for mitigation at a ratio of 3:1; 0.8 acre of Mixed Oak/Coniferous/Bigcone/Coulter which requires 2.4 acres for mitigation at a ratio of 3:1; 101.5 acres from Project development and 1.3 acres from open space easement vacation of Non-native Grassland which requires a total of 52.1 acres for mitigation at ratios of 0.5:1 and 1:1 for the two respective impact types; 7.3 acres of Montane Meadow which requires 21.9 acres for mitigation at a ratio of 3:1; and 0.25 acre of Riparian Scrub which requires 0.75 acre for mitigation at a ratio of 3:1. All mitigation is provided onsite within the open space provided, with the exception of the Riparian Scrub, which may be mitigated either through onsite mitigation as described in section 2.1.5, or through the purchase of credits at an approved offsite mitigation bank.

Guideline 1 is exceeded and impacts are significant. Mitigation is required. **(Impact BI-8)**

*Guideline 2: Any of the following would occur to or within jurisdictional wetlands and/or riparian habitats as defined by ACOE, CDFG and the County of San Diego: removal of vegetation; grading; obstruction or diversion of water flow; adverse change in velocity, siltation, volume of flow; obstruction or diversion of water flow; adverse change in velocity, siltation, volume of flow, or runoff rate; placement of fill; placement of structures; construction of a road crossing; placement of culverts or other underground piping; any disturbance of the substratum; and/or any activity that may cause an adverse change in native species composition, diversity and abundance.*

Project-related future construction, grading, clearing, or other activities would result in impacts to jurisdictional wetlands and/or riparian habitats, as defined by CRWQCB, CDFW, and/or the County of San Diego RPO. This would 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, and Riparian Scrub, would be impacted by the Proposed Project qualify as jurisdictional wetland and/or riparian habitats. Although most of the site's jurisdictional wetlands and riparian habitats would be protected in biological open space, certain relatively minor impacts to these features, as listed here, are unavoidable: impacts to a total of 101.5 acres of Non-native Grassland require 52.1 acres for mitigation at a ratio of 0.5:1 for project impacts, and 1:1 for an area impacted within an open space easement vacation; impacts to 7.3 acres of Montane Meadow require 21.9 acres for mitigation at a ratio of 3:1; and impact to 0.25 acres of Riparian Scrub requires 0.75 acre for mitigation at a ratio of 3:1.

Guideline 2 is exceeded and impacts are significant. Mitigation is required. **(Impact BI-9)**

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

Groundwater-dependent plant species onsite are limited to large, deep-rooted California Sycamores, Western Cottonwoods, and possibly very large willows. These trees in general are considered phreatophytic, having deep-penetrating roots which can tap into groundwater or just above the groundwater level, but are considered to be dependent on groundwater levels for long-term survival only under extreme conditions. The trees onsite are found only in association with drainages. Having a reliable water source, these onsite trees are therefore considered not likely to use groundwater except under extreme conditions. The potential phreatophytes are rare onsite, and most are small and likely not dependent on groundwater. Furthermore, none of the identified well sites in the site's groundwater report are located within 1,000 feet of any potential phreatophytes.

Although it is also found in Southern Coast Live Oak Riparian Forest, Coast Live Oak is considered an upland species on this site. The remaining wetland habitats onsite (Riparian Scrub, Open Water, Coastal and Valley Freshwater Marsh/Emergent Wetland, Disturbed Wetland, and 'wet' Montane Meadow) depend on persistent surface water flows, saturated surface soils, and/or elevated water tables, not groundwater. The plant species associated with these habitats have relatively shallow root systems and are not considered phreatophytes.

Being that the onsite habitats are not anticipated to be groundwater-dependent, the Proposed Project is not anticipated to draw down the groundwater table to the detriment of any groundwater-dependent habitat. Guideline 3 is not exceeded and impacts are not significant. No mitigation is required.

*Guideline 4: The project could increase human access or competition from domestic animals, pests or exotic species to levels proven to adversely affect sensitive habitats.*

The Proposed Project would increase human access or competition from domestic animals by locating 24 residences on the site and allowing limited cattle grazing/breeding. In additions, pests or exotic species associated with these activities could occur. The steep topography would protect some areas and the low development density (1 DU/40 acres) would discourage some incursion into sensitive areas. Cattle grazing density would also be kept low. However, the possibility persists that human access could negatively impact sensitive habitats because some proposed residences are near sensitive habitats. Guideline 4 is exceeded and impacts are significant. Mitigation is required. **(Impact BI-10)**

*Guideline 5: The project does not include a wetland buffer adequate to protect the functions and values of existing wetlands.*

The Proposed Project incorporates wetland buffers that extend at least 50 feet from the outer edge of all RPO wetlands, except in the locations of the necessary road crossings. No buffer is less than 50 feet and the encroachments occur in areas where buffers have been extended to 200 feet due to the presence of oaks, as required by the County guidelines for biology. The encroachments are limited to approximately 50 feet in three isolated areas: lots 6, 7, and 9 due to the main Project

access; lot 8 for the driveway to that lot. The encroachments do not affect the function and value of existing wetland because a minimum of 150 feet buffer is present in all cases. The site's constraints necessitated these encroachments. Constraints include steep slopes and arroyos along the main entrance, extensive wetlands that run in a north/south direction along most of the eastern boundary, and extensive cultural resources in the eastern part of the site that must be avoided. Additionally, RPO wetlands and buffers would be protected from future fire clearing through the dedication of minimum 100-foot Limited Building Zones (LBZs). Guideline 5 is not exceeded and impacts are not significant. No mitigation is required.

In summary, the Proposed Project has both direct and indirect significant impacts to sensitive habitats. These habitats would be protected in open space easements that would effectively mitigate impacts to sensitive habitats to a level less than significant.

### **2.1.2.3 Federal Jurisdictional Wetlands and Waterways**

#### **Guidelines for the Determination of Significance**

Impacts to Federal Jurisdictional Wetlands and Waterways ("waters") associated with the Proposed Project are assessed as being either "significant" or "less than significant," as defined by CEQA. The determination of impact significance is based on the following guidelines:

1. Any of the following would occur to or within federal jurisdictional wetlands and/or waters as defined by ACOE: removal of vegetation; grading; obstruction or diversion of water flow; adverse change in velocity, siltation, volume of flow, or runoff rate; placement of fill; placement of structures; construction of road crossings; placement of culverts or other underground piping; any disturbance of the substratum; and/or any activity that may cause an adverse change in native species composition, diversity and abundance.
2. The project would draw down the groundwater table to the detriment of groundwater-dependent habitat, typically a drop of three feet or more from historical low groundwater levels.
3. The project does not include a wetland buffer adequate to protect the functions and values of existing wetlands.

#### **Analysis**

*Guideline 1: Any of the following would occur to or within federal jurisdictional wetlands and/or waters as defined by ACOE: removal of vegetation; grading; obstruction or diversion of water flow; adverse change in velocity, siltation, volume of flow, or runoff rate; placement of fill; placement of structures; construction of road crossings; placement of culverts or other underground piping; any disturbance of the substratum; and/or any activity that may cause an adverse change in native species composition, diversity and abundance.*

Project-related future construction, grading, clearing, or other activities would result in impacts to Federal Jurisdictional Wetlands and Waterways, as defined by ACOE. This would 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 would directly



impact 0.14 acres of Federal Jurisdictional Wetlands and Waterways. Although most of the site's federal jurisdictional wetlands would be protected in open space, impacts to these features are unavoidable. Guideline 2 is exceeded and impacts are significant. Mitigation is required. (**Impact BI-11**)

*Guideline 2: The project would draw down the groundwater table to the detriment of groundwater-dependent habitat, typically a drop of three feet or more from historical low groundwater levels.*

Groundwater-dependent plant species onsite are limited to large, deep-rooted California Sycamores, Western Cottonwoods, and possibly very large willows. These are associated with drainages, primarily, so it is likely that they are not actually using groundwater, but have the potential to do so in extreme conditions. The Proposed Project would not draw down the groundwater table to the detriment of groundwater-dependent habitat; hydrological tests have demonstrated adequate recovery rates in local wells. Guideline 2 is not exceeded and impacts are not significant. No mitigation is required.

*Guideline 3: The project does not include a wetland buffer adequate to protect the functions and values of existing wetlands.*

The Proposed Project includes wetland buffers that are adequate to protect the functions and values of existing federal wetlands. To that end, the project has been designed to incorporate wetland buffers that extend at least 50 feet from the outer edge of all federal wetlands, except in the locations of the necessary road or driveway crossings. Federal wetlands and buffers would be protected from future fire clearing through the dedication of minimum 100-foot LBZs. Guideline 3 is not exceeded and impacts are not significant.

#### **2.1.2.4 Wildlife Movement and Nursery Sites**

##### Guidelines for the Determination of Significance

Impacts to Wildlife Movement and Nursery Sites associated with the Proposed Project are assessed as being either "significant" or "less than significant," as defined by CEQA. The determination of impact significance is based on the following guidelines:

1. The project would prevent wildlife access to foraging habitat, breeding habitat, water sources, or other areas necessary for their reproduction.
2. The project would substantially interfere with connectivity between blocks of habitat, or would potentially block or substantially interfere with a local or regional wildlife corridor or linkage.
3. The project would create artificial wildlife corridors that do not follow natural movement patterns.
4. The project would increase noise and/or nighttime lighting in a wildlife corridor or linkage to levels proven to affect the behavior of the animals identified in a site specific analysis of wildlife movement.
5. The project does not maintain an adequate width for an existing wildlife corridor or linkage and/or would further constrain an already narrow corridor through activities such as (but not limited to) reduction of corridor width, removal of available vegetative cover, placement of incompatible uses adjacent to it, and placement of barriers in the movement path.

6. The project does not maintain adequate visual continuity (i.e., long lines-of-sight) within wildlife corridors or linkage.

### Analysis

The Proposed Project is projected to cause one direct impact to wildlife movements and nursery sites under the stated guidelines as discussed below.

*Guideline 1: The project would prevent wildlife access to foraging habitat, breeding habitat, water sources, or other areas necessary for their reproduction.*

The project would potentially constrain wildlife access to foraging habitat, breeding habitat, water sources, or other areas necessary for their reproduction in some areas, although ~~most~~ most areas onsite that are used by wildlife would be protected in 4,209.81,214.8 acres of open space. The Proposed Project preserves those portions of the site that are most valuable to wildlife, including the majority of riparian areas, the local wildlife corridors along many of the site's drainages, and all of the regional wildlife corridor along Orinoco/Temescal Canyon Creek and the southern portions of the site. The Proposed Project provides minimum 50-foot biological buffers along many of the drainages that serve as wildlife movement areas, water sources, or nursery sites. Furthermore, wildlife is known to move through agricultural areas and across roads, so these components of the proposed development would not create a barrier to wildlife movement. Guideline 1 is not exceeded and impacts are less than significant. No mitigation is proposed.

*Guideline 2: The project would substantially interfere with connectivity between blocks of habitat, or would potentially block or substantially interfere with a local or regional wildlife corridor or linkage.*

The project would interfere with connectivity between blocks of habitat in some areas through the construction of roads, driveways, homes, fences and other structures onsite, and the conversion of areas of the site to agriculture, landscaping, and development. This would constrain connectivity between blocks of habitat to a degree. However, the project has been designed to minimize interference with habitat connectivity and wildlife corridors and ensure the ongoing integrity of the open space. Although the County Biology Guidelines do not specifically define "blocks of habitat" (other than core wildlife areas), these are interpreted to be areas of natural vegetation in excess of 50 acres, which is the County's maximum acreage not normally requiring management. The determination that impacts to habitat block connectivity are less than significant is based on design modifications adopted as mitigation for this and other biology impacts. To that end, the project as designed preserves the largest and most contiguous habitat blocks on the southern portions of the site, including at least 99 percent of the riparian areas, large blocks of habitat along many of the site's drainages, and all of the regional wildlife corridor along Temescal Canyon Creek and the southern portions of the site, as well as blocks of habitat on the western and northern edges of the site. Lots are a minimum of 40 acres in size. Guideline 2 has not been exceeded, impacts are less than significant, and no mitigation is required.

*Guideline 3: The project would create artificial wildlife corridors that do not follow natural movement patterns.*

The Proposed Project preserves large blocks of habitat, including the site's natural wildlife corridors that follow natural movement patterns. This design does not feature any 'islands' or 'fingers' of open space that would otherwise create gaps and unnatural barriers to the genetic dispersal and movement of plants and animals. Therefore, the Proposed Project would not create artificial wildlife corridors that do not follow natural movement patterns. Guideline 3 is not exceeded and impacts are not significant. No mitigation is proposed.

*Guideline 4: The project would increase noise and/or nighttime lighting in a wildlife corridor or linkage to levels proven to affect the behavior of the animals identified in a site specific analysis of wildlife movement.*

The Proposed Project would not increase noise and/or nighttime lighting in a wildlife corridor, linkage, or nursery to levels proven to affect the behavior of the animals identified in a site-specific analysis of wildlife movement. At least 90 percent of the site's wildlife corridors and linkages would be preserved in dedicated open space. The open space would be protected from any activities that could impact the biological resources within the open space. Residences are generally separate from corridor areas. The Proposed Project proposes low density residential uses and grazing on large lots. As such, the Proposed Project would not introduce any noise and/or nighttime lighting at levels that would affect the behavior of any of the animals identified during the analysis. The Proposed Project would comply with the Dark Sky ordinance. Guideline 4 is not exceeded and impacts are not significant. No mitigation would be required.

*Guideline 5: The project does not maintain an adequate width for an existing wildlife corridor or linkage and/or would further constrain an already narrow corridor through activities such as (but not limited to) reduction of corridor width, removal of available vegetative cover, placement of incompatible uses adjacent to it, and placement of barriers in the movement path.*

The Proposed Project places [4,209.81,214.8](#) acres into open space, all of which is linked and fully supports wildlife movement. The open space is provided in large blocks with widths that are adequate for supporting existing wildlife movement. In particular, a large block of habitat in the southern portions of the site is preserved, maintaining the width of the regional wildlife corridor associated with Orinoco/Temesca Canyon Creek. No areas of the open space are narrow, no removal of vegetative cover would take place within the open space, no incompatible uses would be placed adjacent to the open space, and no barriers to the movement path would be created. Guideline 5 is not exceeded, and impacts are not significant. No mitigation is necessary.

*Guideline 6: The project does not maintain adequate visual continuity (i.e., long lines-of-sight) within wildlife corridors or linkage.*

The vastness of the Proposed Project's [4,209.81,214.8](#) acres of open space preserves the majority of the site's wildlife corridors and linkages. The open space would be protected from any activities that could impact the visual continuity within the corridors and linkages by prohibiting activities such as construction, placement of structures, clearing, and brushing. Guideline 6 is not exceeded, and no mitigation is required.

### **2.1.2.5 Local Policies, Ordinances, Adopted Plans**

#### Guidelines for the Determination of Significance

The determination of impact significance is based on the following guidelines:

1. For lands outside of the MSCP, the project would impact coastal sage scrub (CSS) vegetation in excess of the County's five percent habitat loss threshold as defined by the Southern California Coastal Sage Scrub Natural Community Conservation Planning Process (NCCP) Guidelines.
2. The project would preclude or prevent the preparation of the subregional Natural Communities Conservation Planning Process (NCCP). For example, the project proposes development within areas that have been identified by the County or resource agencies as critical to future habitat preserves.
3. The project would impact any amount of sensitive habitat lands as outlined in the Resource Protection Ordinance (RPO).
4. The project would not minimize and/or mitigate coastal sage scrub habitat loss in accordance with Section 4.3 of the Natural Communities Conservation Planning Process (NCCP) Guidelines.
5. The project does not conform to the goals and requirements as outlined in any applicable Habitat Conservation Plan (HCP), Habitat Management Plan (HMP), Special Area Management Plan (SAMP), Watershed Plan, or similar regional planning effort.
6. The project would preclude connectivity between areas of high habitat values, as defined by the Southern California Coastal Sage Scrub Natural Communities Conservation Planning Process (NCCP) Guidelines.
7. The project would reduce the likelihood of survival and recovery of listed species in the wild.
8. The project would result in the killing of migratory birds or destruction of active migratory bird nests and/or eggs (Migratory Bird Treaty Act).
9. The project would result in the take of eagles, eagle eggs or any part of an eagle (Bald and Golden Eagle Protection Act).

#### Analysis

The Proposed Project is projected to cause direct impacts to Local Policies, Ordinances, and Adopted Plans under the stated guidelines.

*Guideline 1: For lands outside of the MSCP, the project would impact coastal sage scrub (CSS) vegetation in excess of the County's 5% habitat loss threshold as defined by the Southern California Coastal Sage Scrub Natural Community Conservation Planning Process (NCCP) Guidelines.*

The project site is located outside of the MSCP and would impact 16.6 acres of CSS. This would not exceed the County's authorized five percent loss of 2,953.3 acres for this portion of the County. It is the County's policy that any "take" of CSS less than the authorized 2,953.3 acres (five percent loss), is a less than significant impact. Based on this policy, the Project's impacts to CSS as they relate to Local Policies, Ordinances, and Adopted Plans are therefore less than significant. Guideline 1 is not exceeded, impacts are less than significant, and no mitigation is required.



*Guideline 2: The project would preclude or prevent the preparation of the subregional Natural Communities Conservation Planning Process (NCCP). For example, the project proposes development within areas that have been identified by the County or resource agencies as critical to future habitat preserves.*

The Proposed Project is located in a draft proposed Focused Conservation Area (FCA) of the draft East County Subarea MSCP Plan, meaning that the site is important to future regional preserve design. This is because the project would likely be designated as a Pre-Approved Mitigation Area (PAMA) in the draft East County plan. PAMA lands are those that have been identified through an extensive computer modeling process and independent scientific review as being of high biological importance. PAMA lands are “pre-approved” as being suitable for conservation. Furthermore, the site is located partially within and adjoining Cleveland National Forest lands. Although impacts occur, these are less than significant because the Proposed Project preserves 85 percent of the property in managed open space. Guideline 2 is not exceeded, impacts are less than significant, and no mitigation is required.

*Guideline 3: The project would impact any amount of sensitive habitat lands as outlined in the Resource Protection Ordinance (RPO).*

Please refer to Figure 2-1-6, “Proposed Project – RPO Encroachments”, which shows the Proposed Project’s impact locations indexed by number.

Point 1: This is the location of the main project entry road at Lot 7. An RPO wetland is impacted by the crossing. Impacts amount to approximately 0.06 acres. Previously the entry was farther north and crossed two channels. Impacts have been minimized by moving the entry to a point where the wetland converges into a single channel. The current design represents the environmentally superior option because it is consistent with the County’s requirements for RPO crossings:

- (aa) There is no feasible alternative. As described, all options have been weighed, and several previous more impactful design were eliminated in favor of the current, less impactful alignment.
- (bb) The crossing is limited to the least number feasible. The current design reduces the impact to a single crossing which provides the main entrance to the project.
- (cc) The crossing proposed is located and designed in such a way as to cause the least impact to environmental resources because it has been placed at a point where the RPO wetland narrows and where grading can be minimized. The crossing would span the creek, which would protect the majority of the creek bed from permanent disturbance.
- (dd) For all of the crossings, the least-damaging construction methods would be utilized, as guaranteed through the Resource Management Plan (RMP) that would govern the management of the site’s resources during construction and onward in perpetuity. The RMP would ensure that staging would not take place within sensitive areas, that work during the nesting or breeding seasons would not occur, and that noise attenuation measures would be implemented when necessary to avoid disturbance to resources.
- (ee) The applicant has analyzed the possibilities for the crossing to serve adjoining properties. Properties east of the site could utilize the crossing as an

escape route in the event of an emergency. Properties offsite to the northwest of the project boundary also would be able to utilize the crossing in the event of an emergency.

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

Point 2: This is the driveway entry to Lot 8. Part of a 200 foot RPO wetland buffer is impacted by the crossing. It is not feasible to avoid the impact because other sensitive resources would be impacted if the driveway were moved north. One crossing is the minimum number feasible for this lot. The crossing was designed to minimize impact by using the minimum width allowed by fire officials: 24 feet of pavement on a 28 foot graded surface. The buffer width is reduced to 100 feet for approximately 60 feet before widening back to 200 feet. While the crossing is not currently proposed to serve adjoining properties, the design does not preclude future access by adjoining properties. Therefore, the design meets all of the criteria for RPO crossings.

Point 3: The main project entry road impacts the 50 foot wetland buffer associated with an RPO wetland north of the road at Lot 6. No wetland is directly impacted. A detention basin previously proposed in the wetland and wetland buffer has been moved, eliminating direct wetland impacts. The convergence of several resources in the area creates a design challenge. To the south, a Coast Live Oak buffer would be impacted by any relocation of the road to the southward. Also in the area to the south, steep slopes related to a gully create a design challenge; therefore, it is not feasible to avoid RPO buffer. Crossings are limited to the minimum number feasible because this is the main road through the project. The current project design represents the least impactful solution for the crossing. Therefore, the design meets all of the criteria for RPO crossings.

Point 4: This is where the main project entry road impacts approximately 0.03 acres of wetland that is located south of the road at Lot 9. The road alignment has been designed to minimize the impact, but some impacts are nonetheless unavoidable due to the presence of a steep hillside of rock-outcroppings in this area which also contains other sensitive resources that should be avoided. Any redesign further to the north would require blasting into the hillside, and may impact other sensitive resources. Therefore, the design of the road in this location has been optimized to avoid impacts. Crossings are limited to the minimum number feasible because this is the one main road through the project. Therefore, this crossing meets all of the criteria for RPO crossings.

Additional details about these crossings are provided in Section 4.4 of the biological resources report.

The Proposed Project would impact a measurable amount of sensitive habitat lands as outlined in the RPO. That is, the Proposed Project would directly impact 12.6 acres of Southern Mixed Chaparral which requires 6.3 acres for mitigation at a ratio of 0.5:1; 0.8 acres of Chamise Chaparral which requires 0.4 acre for mitigation at a ratio of 0.5:1; 3.8 acres of Diegan Coastal Sage Scrub, Inland Form, which requires 7.6 acres for mitigation at a ratio of 2:1; 12.8 acres of Flat-top Buckwheat which requires 25.6 acres for mitigation at a ratio of 2:1; 4.6 acres of Coast Live Oak Woodland which requires 13.8 acres for mitigation at a ratio of 3:1; 43.7 acres for Project development and 2.2 acres of open space easement vacation of Engelmann Oak Woodland which requires a total of 144.3 acres for mitigation at a ratio of 3:1 as

well as a mitigation ratio of 6:1 for impacts in an area designated as an open space easement; 15.3 acres of Mixed Oak Woodland which requires 45.9 acres for mitigation at a ratio of 3:1; 0.8 acre of Mixed/Oak/Coniferous/Bigcone/Coulter which requires 2.4 acres for mitigation at a ratio of 3:1; 101.5 acres for Project development and 1.3 acres of open space easement vacation of Non-native Grassland which requires a total of 52.1 acres for mitigation at a ratio of 0.5:1 for project impacts, as well as a mitigation ratio of 1:1 for impacts in an area designated as an open space easement; 7.3 acres of Montane Meadow which requires 21.9 acres for mitigation at a ratio of 3:1; and 0.25 acre of Riparian Scrub which requires 0.75 acres for mitigation at a ratio of 3:1.

Of these habitats, hydrophytic areas of ~~of~~ 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." This is 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 Section 15380 of the State CEQA Guidelines. This definition includes 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. Guideline 3 is exceeded, impacts are significant, and mitigation would be required. **(Impact BI-12)**

*Guideline 4 The project would not minimize and/or mitigate coastal sage scrub habitat loss in accordance with Section 4.3 of the Natural Communities Conservation Planning Process (NCCP) Guidelines.*

The Proposed Project has been designed to minimize impacts to CSS to 3.8 acres, or nine percent of the site's resource. On-site mitigation at a 2:1 ratio of preservation to impact is provided. Mitigation of all impacts to coastal sage scrub habitat loss via the dedication of land and the implementation of management agreements, both of which are acceptable mitigation options listed in Section 4.3 of the NCCP Guidelines, would be implemented. Guideline 4 is not exceeded, impacts are less than significant, and no mitigation is necessary.

*Guideline 5: The project does not conform to the goals and requirements as outline in any applicable Habitat Conservation Plan (HCP), Habitat Management Plan (HMP), Special Area Management Plan (SAMP), Watershed Plan, or similar regional planning effort.*

The Proposed Project is not located in an area subject to the goals and requirements as outlined in any existing Habitat Conservation Plan (HCP), Resource Management Plan (RMP), Special Area Management Plan (SAMP), Watershed Plan or similar regional planning effort. Guideline 5 is not exceeded, impacts are less than significant, and no mitigation is necessary.

*Guideline 6: The project would preclude connectivity between areas of high habitat values, as defined by the Southern California Coastal Sage Scrub Natural Communities Conservation Planning Process (NCCP) Guidelines.*

The Proposed Project would not preclude connectivity between areas of high habitat values, as defined by the NCCP Guidelines. This is because the limited amount of CSS on the subject site does not qualify as an area of “high (CSS) habitat value”. While the site contains many areas of high and very high value habitat, the CSS in particular is successional, patchy, and of lower conservation value. Also, due to its successional nature, the onsite CSS vegetation exhibits limited offsite habitat connectivity. Furthermore, the Project has been designed to avoid interference with habitat connectivity and wildlife corridors and ensure the ongoing integrity of the open space.

Guideline 6 is not exceeded, impacts are less than significant, and no mitigation is required.

*Guideline 7: The project would reduce the likelihood of survival and recovery of listed species in the wild.*

The Proposed Project would have no effect on the likelihood of survival and recovery of listed species in the wild because large areas of protected open space are provided. California Gnatcatcher does not occur on this site, and the only other listed species (Cuyamaca Meadowfoam) occurs in an area that would be entirely conserved in open space. Guideline 7 is not exceeded, and impacts are not significant. No mitigation is required.

*Guideline 8: The project would result in the killing of migratory birds or destruction of active migratory bird nests and/or eggs (Migratory Bird Treaty Act).*

In the absence of seasonal avoidance, construction activities associated with Project implementation, such as brushing, clearing, and grading, could result in the death of migratory birds or the destruction of active migratory bird nests and/or eggs. Migratory birds nesting in trees or shrubs to be removed would be impacted, as would any ground nesting migratory birds within areas subject to construction activities. The Proposed Project as proposed could result in the killing of migratory birds or destruction of active migratory bird nests and/or eggs due to intrusions by predatory pets and increased human presence on the site. Guideline 8 is exceeded, impacts are significant, and mitigation is required. **(Impact BI-13)**

*Guideline 9: The project would result in the take of eagles, eagle eggs or any part of an eagle (Bald and Golden Eagle Protection Act).*

No eagles have been detected in the biological surveys conducted for the project, and no known eagle nests are present on-site or within 4000 feet of proposed development. Golden Eagle nesting habitat is not present onsite. This wide-ranging species is known to forage onsite and nest in the Cleveland National Forest, which adjoins the site.

Golden Eagle is declining in San Diego County and is highly sensitive to human activity. The Proposed Project would result in the fragmentation of [206.9201.9](#) acres of Golden Eagle foraging habitat. Additionally, if project grading were to occur during the breeding season for the Golden Eagle, this may result in disturbance of the breeding pattern which might result in take. Project activities could modify eagle behavior, resulting in take as defined by the Wildlife Agencies. Therefore, Guideline 9 is exceeded, and impacts are significant. Mitigation is necessary. **(Impact BI-14)**



### 2.1.3 Cumulative Impact Analysis

A study area approximately two miles south, southeast, and northeast, and one mile north and west of the Proposed Project was selected. This area was selected for its topographic and biotic relationship to the Proposed Project. Areas with similar elevation variations to the east and west are included in order to capture similarities in habitat -due to climate and topography. Additionally, these areas are included to capture continuity with wildlife movement corridors and habitat connectivity to the east and west, particularly along Orinoco/Temescal Canyon Creek. The study area is shown on Figure 1-7, "Master Cumulative Impacts Map," and subsequent detail maps 1-8A through 1-8E.

#### 2.1.3.1 *Special Status Species*

Six other proposed projects in the study area have biological impacts that may include Species of Special Status. These are MUP 77-113 (Julian Sanitation District Sprayfield), TPM 19932 (Ortega 4-lot Subdivision), SP 02-029 (Behen Single Family Dwelling), TPM 20253 (Sauter 5-lot Subdivision), TPM 20571 (Learn 5-lot Subdivision), and TPM 20474 (Klucewich Trust 4-lot Subdivision). The potential impacts associated with these projects are detailed in Table 1-1, "Cumulative Projects".

By design these projects have avoided extensive impacts to special status species. The projects are limited in scale. Most impacts to Special Status Species associated with these projects would consist of impacts to native habitat with the potential to support Special Status Species.

Of the impacts that were quantified, the cumulative projects impact 2.54 acres of oak chaparral, 19.22 acres of Mixed Montane Chaparral, 1.85 acres of Jeffery Pine, some *Symphonicarpus Eriogonum*, 21.5 acres of Chaparral, 5.4 acres of Dry Montane Meadow, 9.1 acres of Mixed Oak Woodland, and 0.3 acres of Open Water. The Proposed Project has impacts in three of these categories. It impacts 15.3 acres of Mixed Oak Woodland, 13.4 acres of Chaparral (12.6 acres of Southern Mixed Chaparral and 0.8 acre of Chamise Chaparral), and 7.3 acres of Dry Montane Meadow. This amounts to 63 percent, 38 percent, and 57 percent, respectively, of the cumulative impacts to these species.

TPM 19932 supports Velvety False-Lupine. However, the Proposed Project proposes an open space easement to avoid impacts to that Special Status Species.

Cumulative impacts to Special Status Species are not significant because impact areas are limited in scale and/or do not significantly impact large numbers of special status species.

The loss of these habitat areas does not impinge upon the continued viability of this species in the region, because these habitats are widespread in the region. Additionally, all projects with impacts to these habitats conform to County regulations for the protection of sensitive species, and have been required to mitigate for those impacts. Through a program of avoidance, mitigation and adherence to County regulations, these cumulative impacts do not preclude the continued viability of these habitats. Therefore, cumulative impacts to special status species are not significant, and no mitigation is required.

### **2.1.3.2 *Riparian Habitat or Sensitive Natural Community***

The Proposed Project would contribute to the cumulative loss of Riparian Habitat or other Sensitive Natural Communities. That is, the Proposed Project would 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 for Project development and 2.2 acres of open space easement vacation of Engelmann Oak Woodland, 15.3 acres of Mixed Oak Woodland, 0.8 acre of Mixed Oak/Coniferous/Bigcone/Coulter, 101.5 acres for Project development and 1.3 acres of open space easement vacation of Non-native Grassland, 7.3 acres of Montane Meadow, and 0.25 acre of Riparian Scrub.

Other active projects in the cumulative study area that would impact Riparian Habitats or Other Sensitive Natural Communities and are MUP 77-113, SP 02-029, TPM 20253, TPM 20571, and TPM 20474. The potential impacts associated with each of these projects are listed in Table 1-1. MUP 77-113 would impact oaks and riparian habitat, SP 02-029 would impact 20 oak trees; TPM 20253 would impact Oak Chaparral and Mixed Montane Chaparral; TPM 20571 would impact Jeffrey Pine Forest, Mixed Montane Chaparral, and Snowberry/Buckwheat; and TPM 20474 would impact Chaparral, Dry Montane Meadow, Mixed Oak Woodland, and Open Water. In general impacts are avoided whenever possible in keeping with County regulations.

All of these projects would mitigate for impacts to Riparian Habitats or Other Sensitive Natural Communities through the dedication of onsite open space easements, as required by County regulations. Individual impacts have therefore been reduced to a level that is less than significant. Cumulative projects do not affect the continued viability of these habitats because of a program of avoidance, mitigation, and adherence to County policy.

Furthermore, due to the extent of the Riparian Habitats (including State and County Wetlands and "Waters") or Other Sensitive Natural Communities on the Proposed Project site, as well as the fact that all impacts to these resources would be mitigated for to a level that is below significant, approval of the Proposed project would not have a cumulatively considerable impact when viewed in connection with effects of past projects, the effects of other current projects, and the effects of probable future projects affecting the same resource.

### **2.1.3.3 *Federal Jurisdictional Wetlands and Waterways***

The Proposed Project would contribute to the cumulative loss of Federal Jurisdictional Wetlands and Waterways. Project-related future construction, grading, clearing or other activities related to the Proposed Project would permanently affect Federal Jurisdictional Wetlands and Waterways on the Proposed Project site. That is, the Proposed Project would directly impact 0.14 acre of jurisdictional wetlands and/or non-wetland "waters".

Other active projects within the cumulative study area that could contribute to the loss of Jurisdictional Wetlands and Waterways within the cumulative study area include MUP 77-113 and TPM 20474. The potential impacts associated with each of these projects are listed in Table 1-1. MUP 77-113 could impact riparian habitat and runoff associated with the project could impact surface and groundwater. TPM 20474 would impact 0.3 acre of Open Water, which likely qualifies as jurisdictional wetlands

and “waters”. MUP 77-113 proposes open space to avoid impacts to riparian habitat, with 100-foot buffers around drainages and no surface run-off. TPM 20474 would mitigate for project impacts through the dedication of an onsite open space easement. Therefore, these projects either avoid impacts to Jurisdictional Wetlands and Waterways or provide mitigation to reduce impacts to a level that is less than significant. No other projects within the cumulative study area are listed as impacting Jurisdictional Wetlands and Waterways. Cumulative impacts are not significant. No mitigation is necessary.

Furthermore, due to the extent of the federal wetlands on the Proposed Project site, as well as the fact that all impacts to Federal Jurisdictional Wetlands and Waterways would be mitigated for to a level that is below significance, approval of the Proposed project would not have a cumulatively considerable impact when viewed in connection with effects of past projects, the effects of other current projects, and the effects of probable future projects affecting the same resource.

#### **2.1.3.4 *Wildlife Movement and Nursery Sites***

Other proposed projects within the cumulative study area that could potentially impact Wildlife Movement or Nursery Sites include MUP 77-113, TPM 20253, TPM 20571, and TPM 20474. Each of these projects could remove native vegetation and therefore impact wildlife movement. However, the areas to be impacted by these projects are small (no more than 40 acres for the largest project) and each project proposes onsite open space that would preserve a portion of each project site for wildlife movement. Therefore, all of these projects have either minimal impacts or significant impacts that would be mitigated for to a level that is less than significant.

Because the Proposed Project creates no significant impacts to Wildlife Movement or Nursery Sites, and the other proposed projects within the cumulative study area would not result in significant impacts to Wildlife Movement or Nursery Sites, approval of the Proposed Project would not result in cumulatively considerable impacts when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects affecting the same resource. Cumulative impacts to Wildlife Movement and Nursery Sites are not significant, and no mitigation is required.

#### **2.1.3.5 *Local Policies, Ordinances and Adopted Plans***

The other projects within the cumulative study area (MUP 77-113, TPM 19932, SP 02-029, TPM 20253, TPM 20571, and TPM 20474) conform to local policies, ordinances, and adopted plans that are current at the time of their applications. Several of these projects already have Mitigated Negative Declarations. The remaining cumulative projects would conform to a range of policies intended to protect biological resources, including requirements for the effective management of protected open space, the no net loss of wetlands policy, and controls on runoff and stormwater. All projects with CSS impacts must meet County HLP requirements, which include 4d Findings. These Findings include a finding that a project’s loss of CSS would not have a significant negative impact when considered in conjunction with CSS losses that have already occurred in the region. Findings are not made if these impacts are present. As such, County policy precludes approval of projects which have a cumulatively significant impact to CSS.

Therefore, the other projects within the cumulative study area would not have significant impacts in relation to conformance with Local Policies, Ordinances, and Adopted Plans. Furthermore, due to the fact that all impacts to Local Policies, Ordinances, or Adopted Plans associated with the Proposed Project would be mitigated for to a level that is below significance, approval of the Proposed Project would not have cumulatively considerable impacts when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects affecting the same resource. Therefore, cumulative impacts are not significant in relation to conformance with local policies, ordinances, and adopted plans. No mitigation is necessary.

## 2.1.4 Significance of Impacts Prior to Mitigation

The following is a brief summary of all direct and indirect impacts which were determined to be significant by the analysis provided by the Biological Resources Survey (Appendix A).

### 2.1.4.1 *Impacts to Special Status Species*

- BI-1 Indirect long-term (permanent) impacts to Swainson's Hawk and Cuyamaca Meadowfoam, which are Threatened or state-listed Endangered Species, due to habitat loss.
- BI-2 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, Two-striped Garter Snake, and Large-blotched Salamander. Indirect impacts: Velvety False Lupine, 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.
- BI-3 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, Orange-throated Whiptail, San Diego Ringneck Snake, Coronado Skink, San Diego Horned Lizard, Coastal Western Whiptail, Coastal Rosy Boa, [San Diego Mountain Kingsnake](#), and Northern Red Diamond Rattlesnake. Indirect impacts: Great Blue Heron, [California](#) Horned Lark, Western Bluebird, Barn Owl, Mountain Lion, Mule Deer, and Monarch Butterfly.
- BI-4 Direct and indirect long-term (permanent) impacts to Golden Eagle habitat due to habitat conversion.
- BI-5 Direct long-term (permanent) impacts to up to [206.9201.9](#) 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.
- BI-6 Indirect long-term (permanent) impacts to special status species due to human presence or intrusion into sensitive habitat.
- BI-7 Indirect short-term (temporary) impacts to nesting success of special status species due to grading and other noise-generating activities.



**2.1.4.2 Impacts to Riparian Habitat or Sensitive Natural Communities**

- BI-8 Direct long-term (permanent) onsite impacts to sensitive native or naturalized habitat resulting from construction, grading, or clearing include 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 for Project development and 2.2 acres of open space easement vacation of Engelmann Oak Woodland, 15.3 acres of Mixed Oak Woodland, 101.5 acres of Non-native Grassland, 7.3 acres of Montane Meadow, and .25 acre of Riparian Scrub.
- BI-9 Project-related future construction, grading, clearing, or other activities would result in direct long-term (permanent) impacts to jurisdictional wetlands and/or riparian habitats, as defined by CRWQCB, CDFW, and the County of San Diego RPO. This would 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, and Riparian Scrub would be impacted by the Proposed Project qualify as jurisdictional wetland and/or riparian habitats.
- BI-10 Indirect long-term (permanent) impacts due to increased human access or competition from domestic animals, pests or exotic species to levels proven to adversely affect sensitive habitats.

**2.1.4.3 Impacts to Federal Jurisdictional Wetland and Waterways**

- BI-11 Project-related future construction, grading, clearing, or other activities would result in direct long-term (permanent) impacts to federal jurisdictional wetlands and/or waterways, as defined by ACOE. This would 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 would impact 0.14 acre of Federal Jurisdictional Wetlands and/or Waterways.

**2.1.4.4 Impacts to Local Policies, Ordinances, Adopted Plans**

- BI-12 Direct long-term (permanent) impacts to a measurable amount of RPO-sensitive habitat lands. That is, the Proposed Project would 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 for Project development and 2.2 acres of open space easement vacation of Engelmann Oak Woodland, 15.3 acres of Mixed Oak Woodland, 101.5 acres for Project development and 1.3 acres of open

space easement vacation of Non-native Grassland, 7.3 acres of Montane Meadow, and 0.25 acre of Riparian Scrub onsite.

Of these habitats, hydrophytic areas of ~~of~~ JU 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 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 long-term (permanent) and indirect long-term (permanent) impacts because the Proposed Project could, without seasonal restrictions, 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.
- BI-14 The Proposed Project would create indirect long-term (permanent) impacts because the Project Site does support Golden Eagles, and would 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.

## 2.1.5 Mitigation

The following mitigation measures are proposed to mitigate for the listed impacts:

### 2.1.5.1 M-BI-1

The ~~4,209.81~~ 214.8-acre Open Space Easement would preclude future development or other use of the land within that area and provides the mitigation required for all biological impacts onsite (M-BI-1 through M-BI-19).

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

A complete breakdown of Proposed Project impacts, mitigation requirements, impact neutral acreage, and mitigation area provided within the Project open space is provided as follows:

- 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 Project protects a total of 104.9 acres in the

OSE, 26.9 acres of which are impact neutral. The total available for mitigation is therefore 78.0 acres, which is 71.7 acres above the requirement.

- 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 protects a total of 96.1 acres in the OSE, 12.7 acres of which are impact neutral. The total available for mitigation is therefore 83.4 acres, which is 83 acres above the requirement.
- 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 protects a total of 36.8 acres in the OSE, 1.5 acres of which are impact neutral. The total available for mitigation is therefore 35.3 acres, which is 31.5 acres above the requirement.
- 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 protects a total of 58.6 acres in the OSE, 6.0 acres of which are impact neutral. The total available for mitigation is therefore 52.6 acres, which is 27.0 acres above the requirement.
- 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.
- A loss of 43.7 acres for Project development and 2.2 acres of open space easement vacation of Engelmann Oak Woodland requires a total of 144.3 acres of mitigation at ratios 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 requirement.
- 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.
- 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.
- 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.
- 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.
- A loss of 0.25 acre of Riparian Scrub requires 0.75 acre of mitigation at a ratio of 3:1. The Proposed Project provides 2.96 acres in the OSE. 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 onsite acres of Riparian Scrub are considered 'impact neutral', and cannot satisfy the requirement for mitigation of

this impact. The proposed mitigation would be either offsite mitigation in an approved wetland mitigation bank, or the preparation and implementation of an approved Wetland Revegetation Plan (provided as Attachment E to the biology report), in keeping with the no net loss of wetland policy adopted by the County.

#### **2.1.5.2 M-BI-2**

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

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

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

#### **2.1.5.3 M-BI-3**

The protections provided by the RMP over the open space areas onsite would provide protections for raptors (including Golden Eagle, specifically), migratory birds, and other sensitive bird species' and their habitats as well. In order to prevent potential impacts to the nesting success of sensitive animals, site brushing, grading, and/or the removal of native vegetation within 500 feet of any potential nesting location shall not take place during the native bird season, defined as from 1 January ~~through September 1<sup>st</sup>~~ 31 August each year. This is required in order to ensure compliance with the federal Migratory Bird Treaty Act and Sections 3505, 3505.5, and 3513 of the California Fish and Game Code, which prevent the 'take' of eggs, nests, feathers, or other parts of most native bird species. Should it be necessary to conduct brushing, grading, or other construction activities during the bird breeding season, a biologist with experience conducting bird breeding surveys will conduct a preconstruction nesting survey of all areas within 500 feet of the proposed activity would be required. The results of the survey would be provided in a report to the Director, Department of Planning and Development Services and the Wildlife agencies for concurrence with the conclusions and recommendations. If an active nest is detected, no grading or other construction activity will be allowed within the 500 foot buffer will be allowed until the fledged birds have left the nest. The buffer distance may be altered in which case a site specific nest protection plan will be developed. The plan will include detailed methodologies and definitions to enable a qualified avian biologist to monitor and implement rest-specific buffers based on the



[individual species involved, site conditions, level of human activity, and other activity in the area.](#)

#### **2.1.5.4 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 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.

#### **2.1.5.5 M-BI-5**

A Conservation Grazing Management Plan (CGMP) for the Proposed Project contains site-specific conservation measures and practices that address multiple resource concerns on areas where grazing related activities or practices would be planned and applied. This includes a discussion of climate, water resources, geology, special physical features, soils, erosion, hydrology, surface water drainage, and water quality along with grazing capacity, infrastructure, special management areas and hazards, ecosystem health, special habitats and feature characteristics. The CGMP identifies predicted effects and desired conditions, including the consequences of grazing and related management of special resources, non-grazing (but related) management of special resources, alternative feasible management scenarios, and timeline of management requirements of special resources affected by grazing. The Plan discusses sustainability, including integration with the regional socio-economic systems for long-term viability, and guidelines, incentives, and contingencies for all operations. Finally, the CGMP defines the monitoring of site conditions and the planned effects on resources related to grazing, including monitoring variables, methods, a schedule, evaluation standards and analysis, adaptation of management actions, and reporting. [The CGMP will be applied if grazing occurs in the open space area.](#)

#### **2.1.5.6 M-BI-6**

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

#### **2.1.5.7 M-BI-7**

The Proposed Project is in compliance with the County's RPO requirement that impacts to RPO wetlands be avoided except under certain extenuating circumstances (See RPO Section 86.604(a)(5)). Section 2.1.2.5 of this ~~DEIR~~FEIR provides the details of those impacts and their analysis. The County also requires buffers of at least 50-feet to protect all RPO wetlands. The County considers RPO wetlands and the habitat within RPO wetland buffers to be "impact neutral" and

therefore unavailable for use as mitigation for project impacts. Furthermore, where oak woodland occurs adjacent to an RPO wetland, the County requires that the wetland buffer be extended outward to include the entirety of the oak habitat (not to exceed 200 feet in width). Where feasible, the Proposed Project complies with these requirements.

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

The least damaging construction methods would be utilized to construct the RPO wetland crossing and driveways. Staging areas would be located outside of sensitive areas, work would not be performed during the avian breeding season, noise attenuation measures would be included, and hours of operation would be limited so as to comply with all applicable ordinances and avoid impacts to sensitive resources. These measures would also be included in the RMP to be prepared as a Condition of Project Approval. Lastly, as discussed above, all direct impacts to RPO wetlands would be mitigated for at a 3-to-1 ratio, with no less than 1-to-1 of this total consisting of wetlands creation.

#### **2.1.5.8 M-BI-8**

The Proposed Project would be required to obtain a HLP from the County of San Diego. The permit would mitigate agency concerns by providing appropriate mitigation for all project-related impacts to Diegan Coastal Sage Scrub and related Scrub habitats. The site supports approximately 150.3 acres of Scrub habitat (Diegan Coastal Sage Scrub, Inland Form, Flat-top Buckwheat, and Coastal Sage – Chaparral Scrub), 16.7 acres of which would be impacted by development.

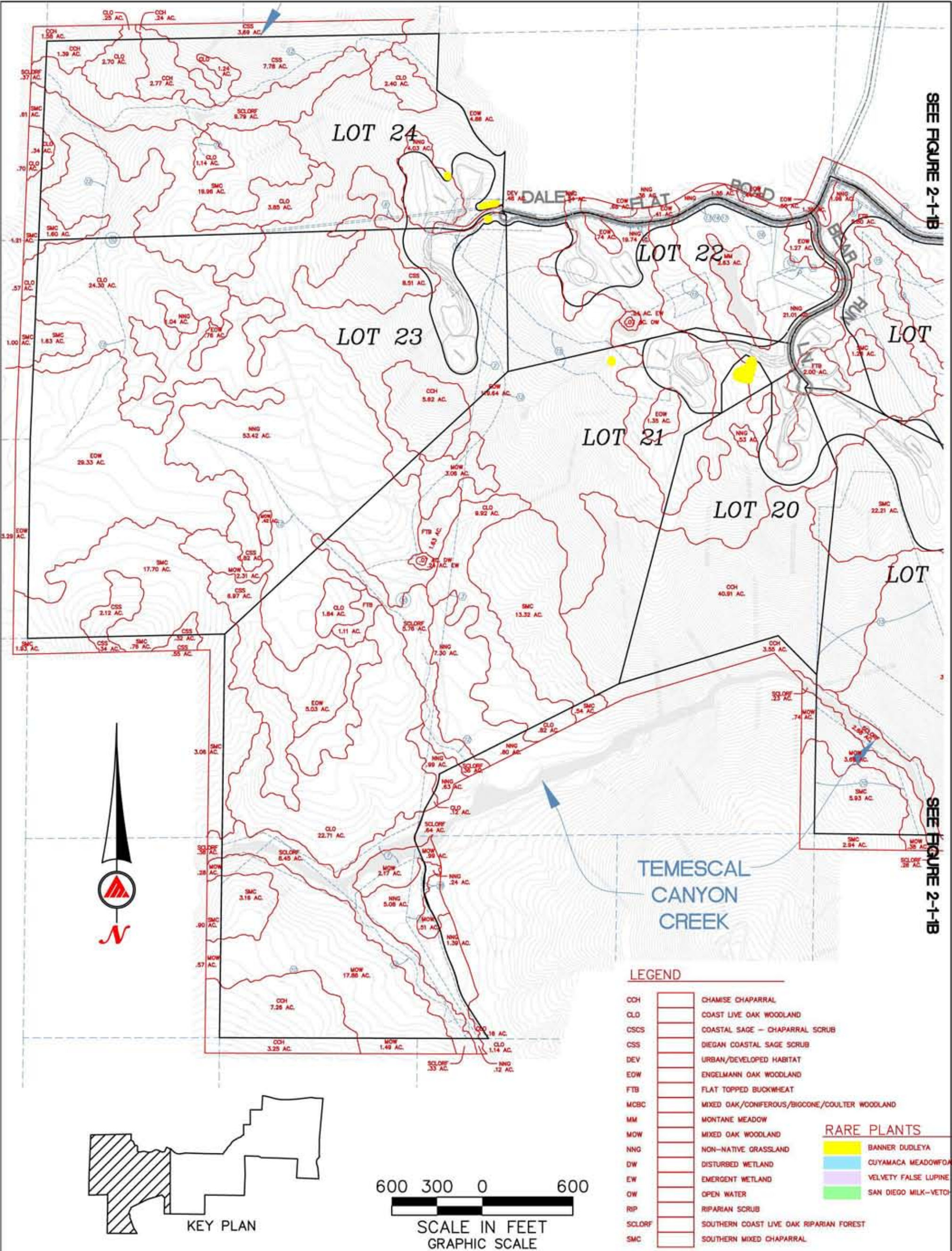
#### **2.1.6 Conclusion**

Biological resources were analyzed by a County-qualified biological consultant. The analysis included review of prior records and reports, field visits, and review of current mapping. Future development of the Proposed Project Site, as presently proposed, could result in significant direct and indirect short- and long-term impacts to the following biological resources: species of special status, riparian resources, federal jurisdictional wetlands, wildlife movement and nursery sites, and local policies, ordinances, or adopted plans. Mitigation for these impacts is proposed, as follows: The Proposed Project proposes a [4,209.81,214.8](#)-acre open space preserve to protect sensitive species, riparian and jurisdictional wetlands, and nursery sites. The open space design includes 50-foot buffers adjacent to oaks, as well as 50 to 200 foot buffers adjacent to wetland wherever possible. A CGMP for the Proposed Project is designed to direct ongoing grazing activities within open space areas. A RMP would be required that would specify management activities and reporting within the open space. The Grazing Manager and the Habitat Manager would work in tandem, through the prescriptions provided by their respective resource management plans, to ensure that grazing activities are harmonious

with the onsite resources. This mitigation would provide open space protections that preserve sensitive habitats and manage the open space in perpetuity. Protections consist of fencing and signage, as needed, to deter intrusions. Professional management and reporting would be incorporated to ensure that protections remain effective and that the open space is monitored on an on-going basis.

Direct impacts to sensitive habitats would be mitigated by a program of onsite open space preservation. Mitigation is provided according to County approved mitigation ratios, ranging from 0.5 to 3 acres for each acre of project impact. Wetland loss would be mitigated with either the purchase of credits at an approved mitigation bank, or additional wetland creation and enhancement onsite which shall be subject to the requirements of an approved WRP, in keeping with the no net loss of wetland policy adopted by the County. Construction and related activity would be restricted during the breeding season of sensitive and migratory birds. The appropriate permits would be obtained from ACOE, CDFW, or the County of San Diego prior to grading or construction in wetlands, CSS, or other protected habitats. These would include a Habitat Loss Permit (4d) for impacts to CSS. Through a program of avoidance and open space protection, permitting, controls on grading and construction activity, and on-going professional management, the Proposed Project mitigates its significant impacts to below a level of significance. No further mitigation is required.

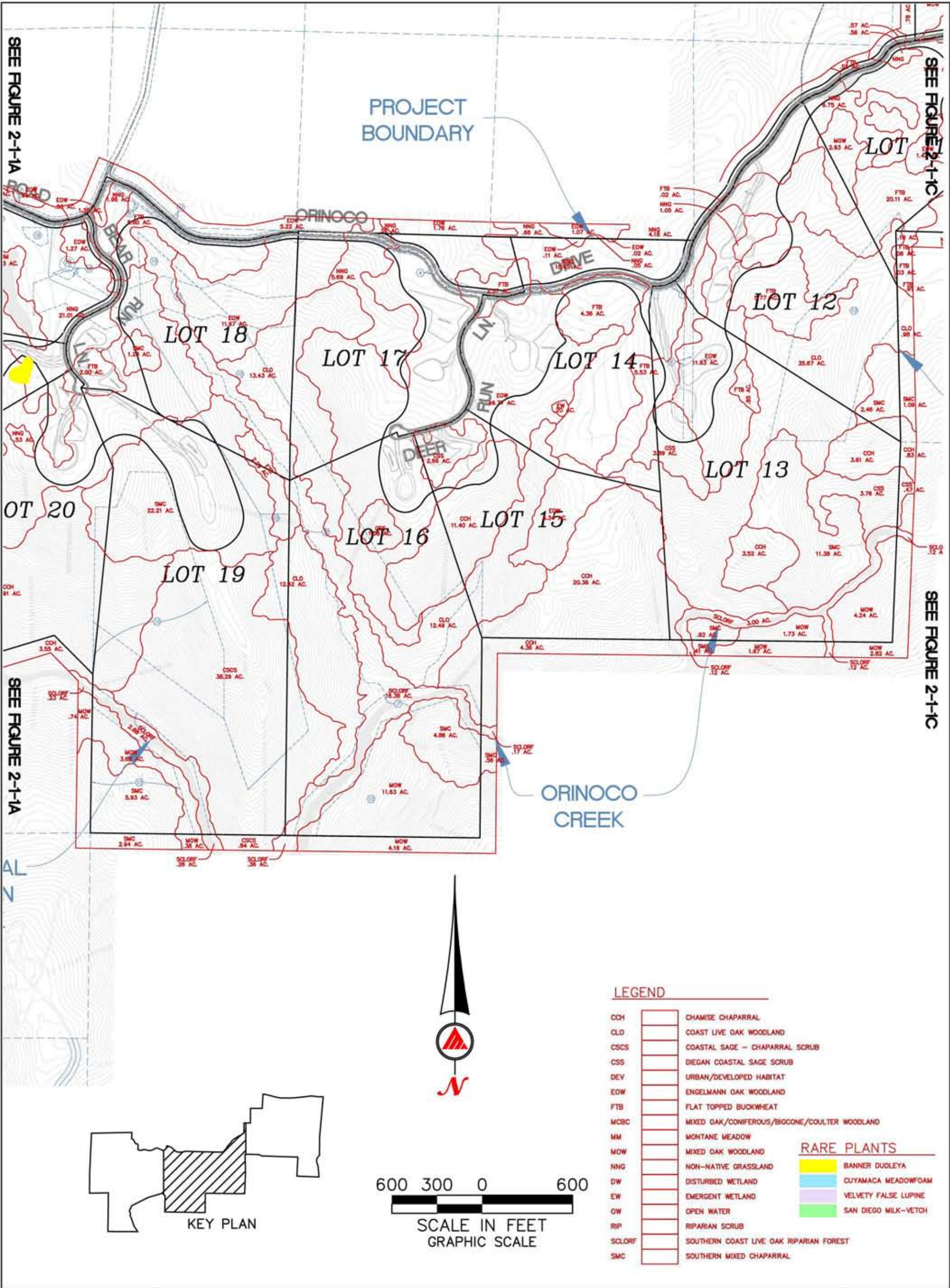




SEE FIGURE 2-1-1B

SEE FIGURE 2-1-1B





**FIGURE 2-1-1B**

**BIOLOGICAL RESOURCES - CENTRAL**

**TRG CONSULTANTS**



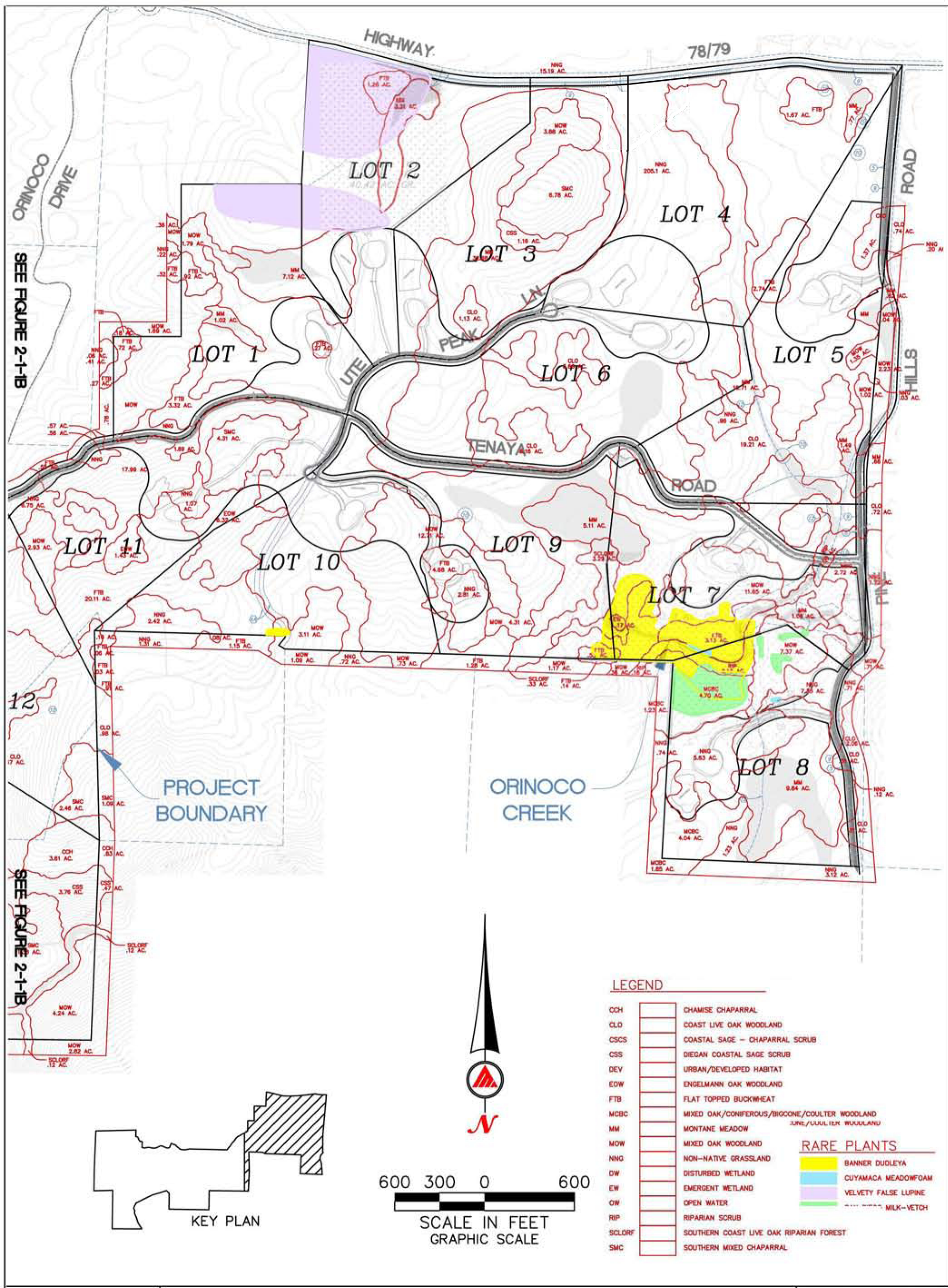
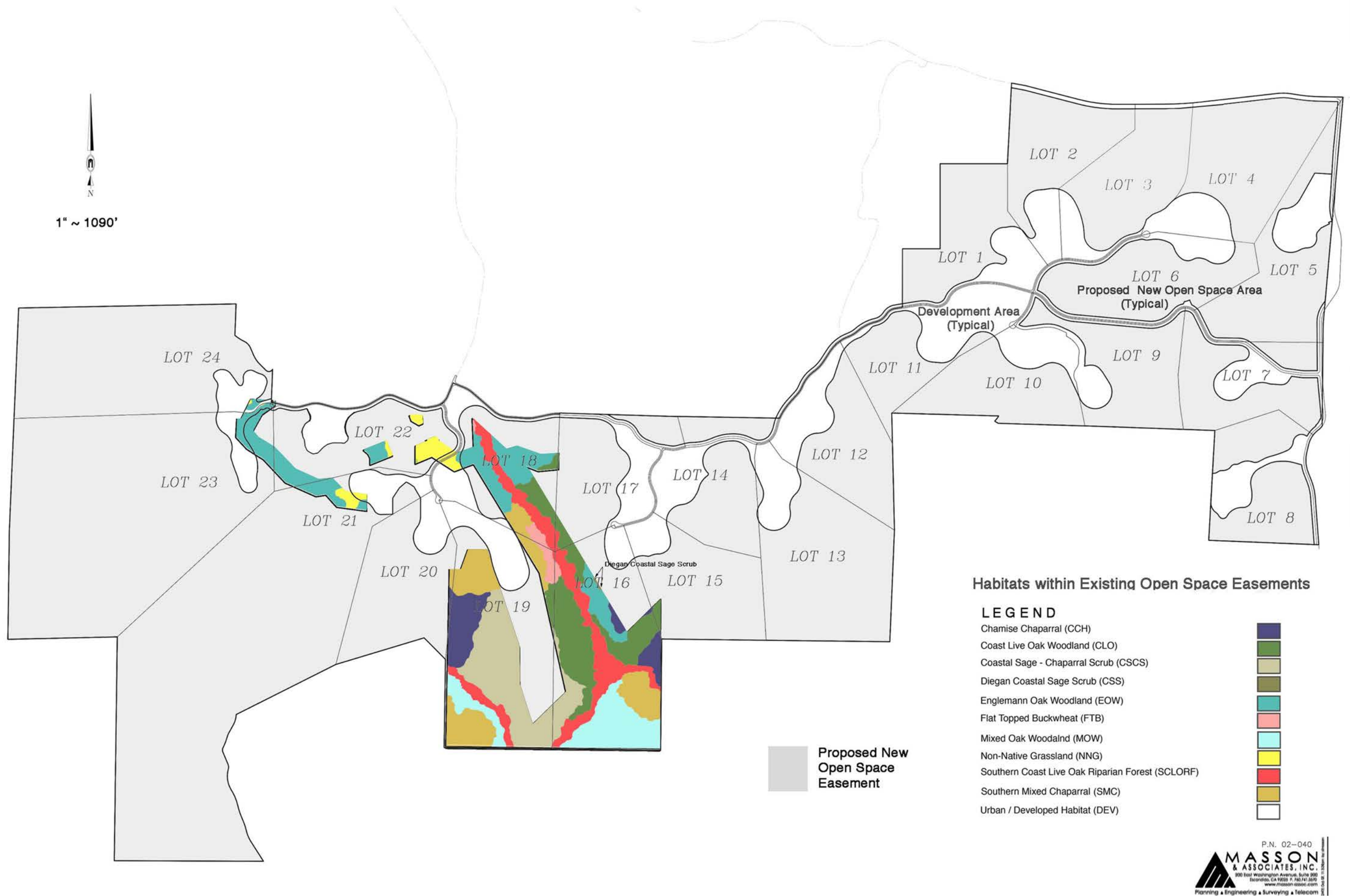


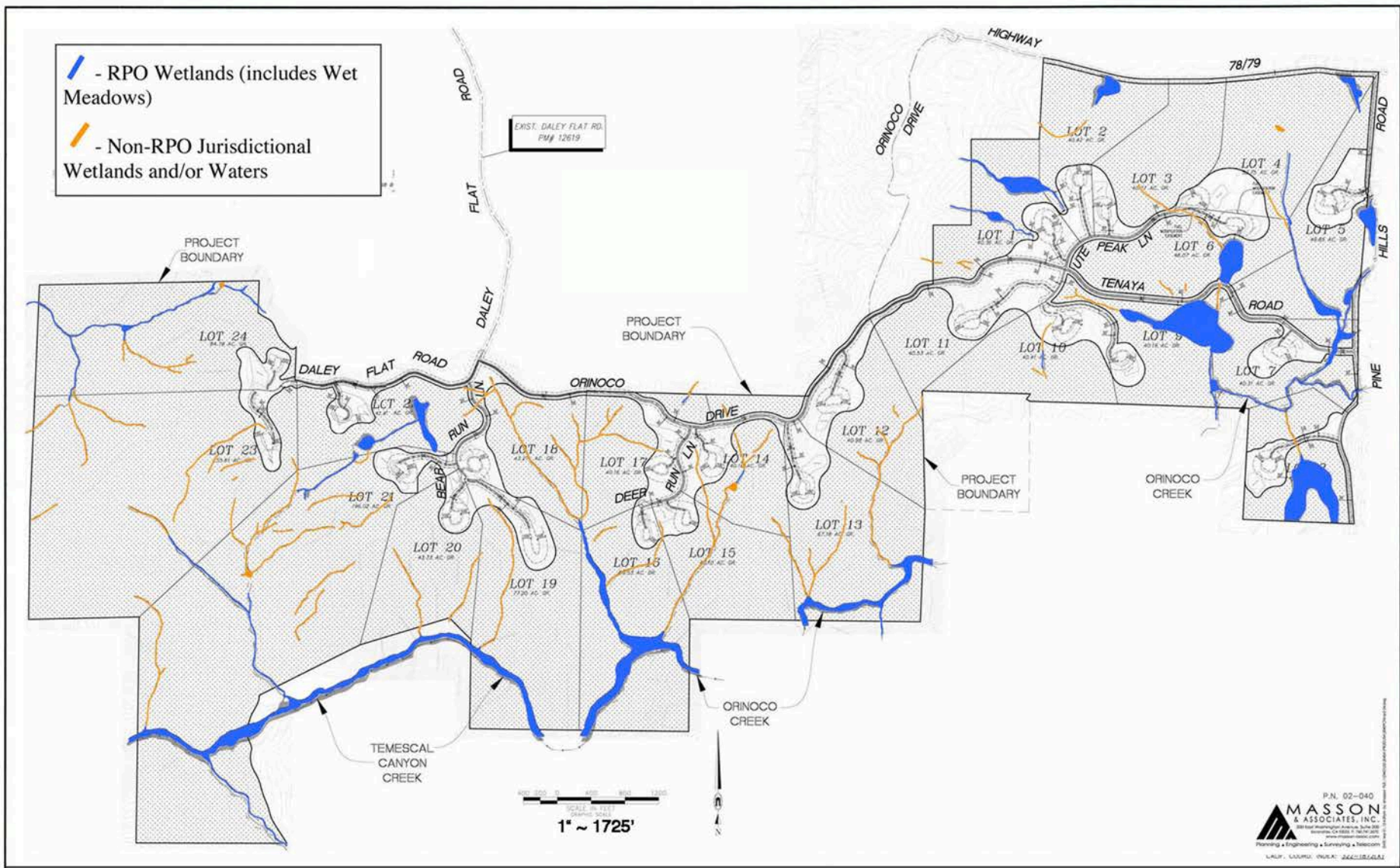
FIGURE 2-1-1C

BIOLOGICAL RESOURCES MAP - EAST












**Figure  
2-1-3**

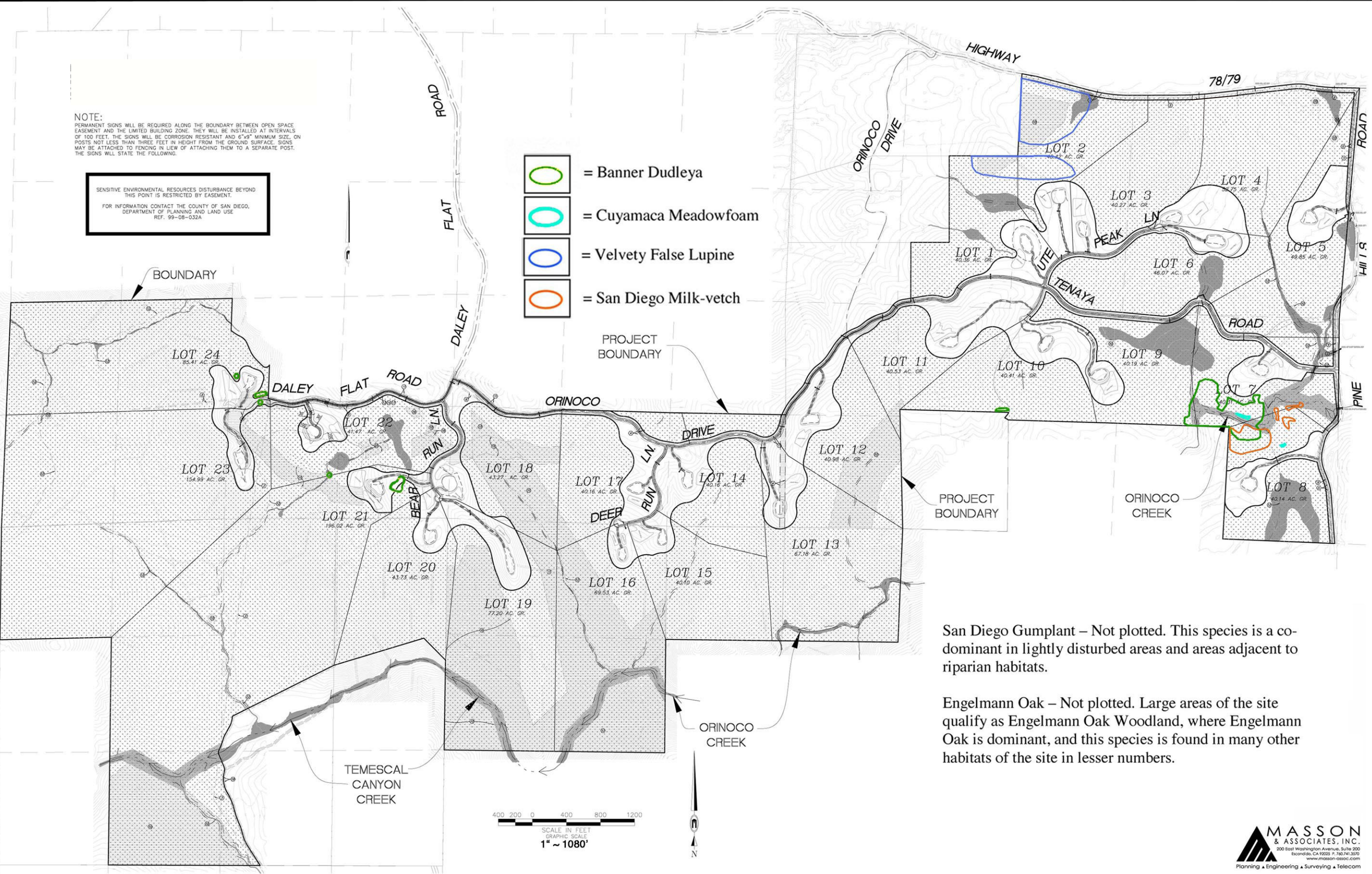
## Wetland Delineation



NOTE:  
PERMANENT SIGNS WILL BE REQUIRED ALONG THE BOUNDARY BETWEEN OPEN SPACE EASEMENT AND THE LIMITED BUILDING ZONE. THEY WILL BE INSTALLED AT INTERVALS OF 100 FEET. THE SIGNS WILL BE CORROSION RESISTANT AND 6"x9" MINIMUM SIZE. ON POSTS NOT LESS THAN THREE FEET IN HEIGHT FROM THE GROUND SURFACE. SIGNS MAY BE ATTACHED TO FENCING IN LIEU OF ATTACHING THEM TO A SEPARATE POST. THE SIGNS WILL STATE THE FOLLOWING:

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

-  = Banner Dudleya
-  = Cuyamaca Meadowfoam
-  = Velvety False Lupine
-  = San Diego Milk-vetch



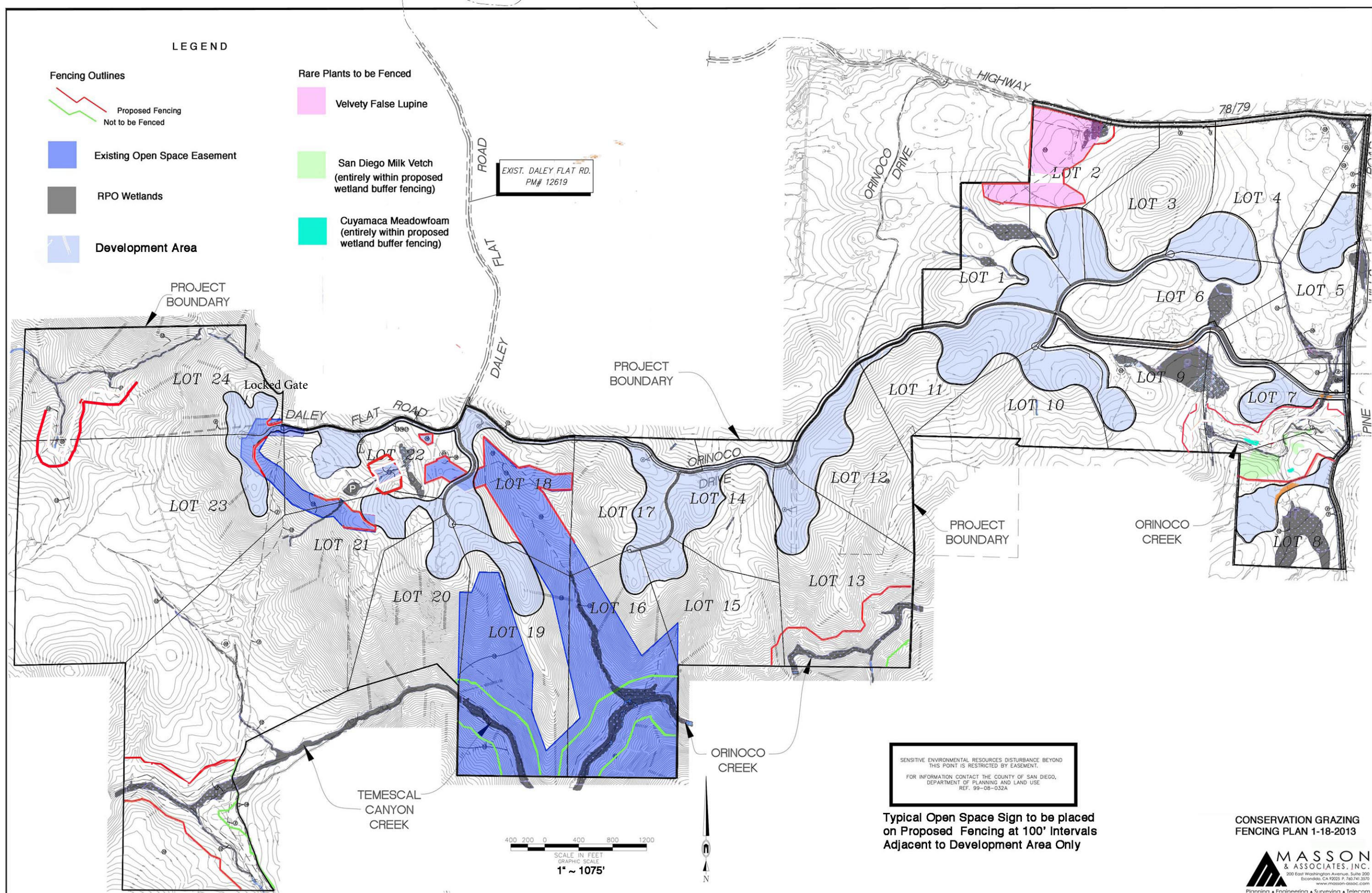
San Diego Gumplant – Not plotted. This species is a co-dominant in lightly disturbed areas and areas adjacent to riparian habitats.

Engelmann Oak – Not plotted. Large areas of the site qualify as Engelmann Oak Woodland, where Engelmann Oak is dominant, and this species is found in many other habitats of the site in lesser numbers.



LEGEND

- Fencing Outlines**
- Proposed Fencing
  - Not to be Fenced
- Existing Open Space Easement**
- RPO Wetlands**
- Development Area**
- Rare Plants to be Fenced**
- Velvety False Lupine
  - San Diego Milk Vetch (entirely within proposed wetland buffer fencing)
  - Cuyamaca Meadowfoam (entirely within proposed wetland buffer fencing)



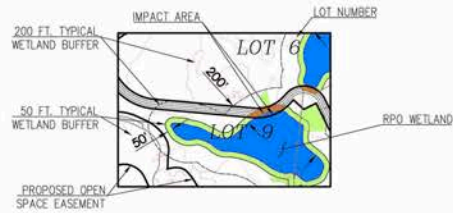
SENSITIVE ENVIRONMENTAL RESOURCES DISTURBANCE BEYOND THIS POINT IS RESTRICTED BY EASEMENT.  
FOR INFORMATION CONTACT THE COUNTY OF SAN DIEGO, DEPARTMENT OF PLANNING AND LAND USE, REF. 99-08-032A

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

CONSERVATION GRAZING  
FENCING PLAN 1-18-2013

**MASSON & ASSOCIATES, INC.**  
200 East Washington Avenue, Suite 200  
Escondido, CA 92025 P. 760.741.3570  
www.masson-assoc.com  
Planning • Engineering • Surveying • Telecomm





BLUE AREAS ARE COUNTY OF SAN DIEGO WETLANDS

GREEN COUNTY OF SAN DIEGO RPO

ORANGE BUFFER IMPACTS

ENCROACHMENT NUMBER

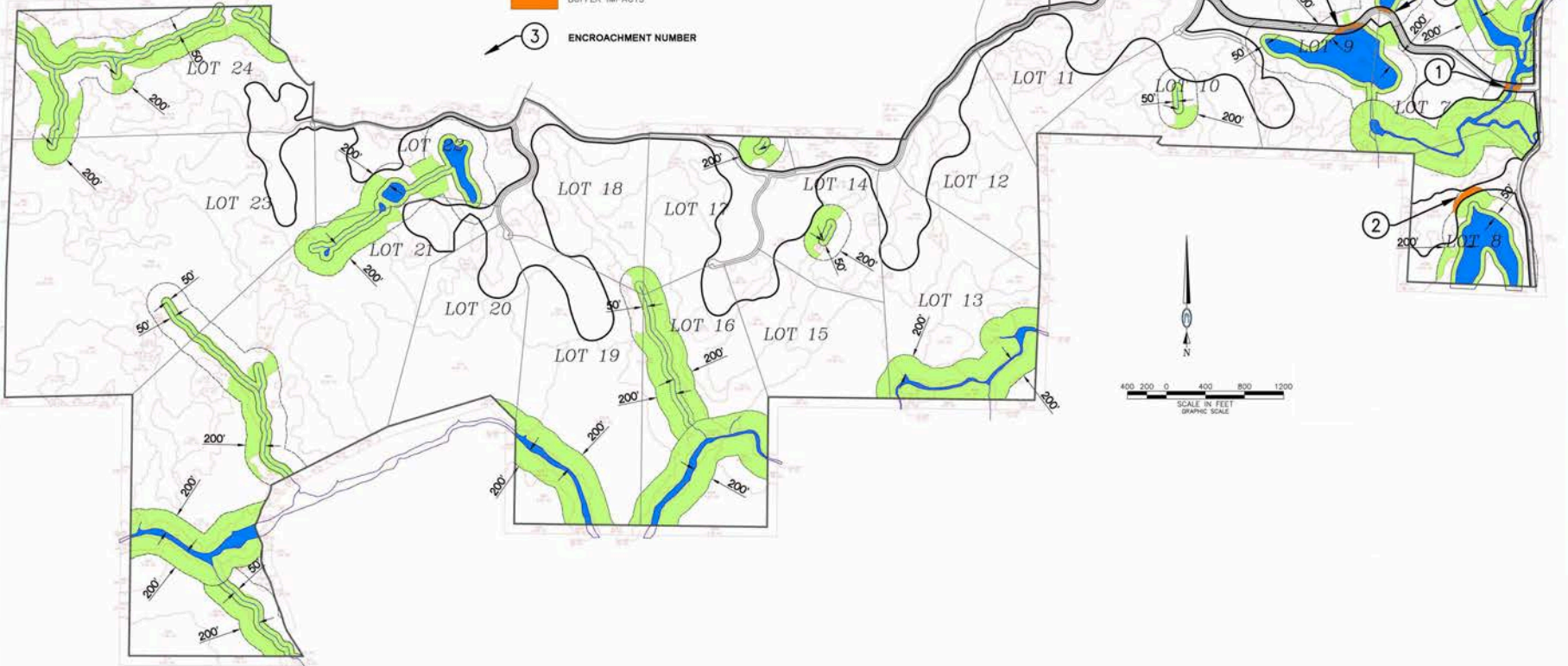


Figure  
2-1-6

## Proposed Project - RPO Encroachments

<b>Habitat</b>	<b>Existing Acres</b>	<b>Development Impact Acres</b>	<b>OSE Vacation Impact Acres</b>	<b>“Impact Neutral” Acres</b>
<u>Southern Mixed Chaparral</u>	117.5	12.6	0.00	26.9
<u>Chamise Chaparral</u>	96.9	0.8	0.00	12.7
<u>Diegan Coastal Sage Scrub</u>	40.6	3.8	0.00	1.5
<u>Flat-top Buckwheat</u>	71.4	12.8	0.00	6.0
<u>Coastal Sage–Chaparral Scrub</u>	38.3	0.00	0.00	23.8
<u>Coast Live Oak Woodland</u>	175.8	4.6	0.00	51.8
<u>Engelmann Oak Woodland</u>	246.0	45.9	2.2	44.2
<u>Mixed Oak Woodland</u>	115.0	15.3	0.00	45.4
<u>Mixed Oak/.../Coulter</u>	8.7	0.8	0.00	2.8
<u>Non-native Grassland</u>	375.8	102.8	1.3	13.8
<u>Montane Meadow</u>	76.3	7.3	0.00	2.3
<u>Southern CLO Riparian Forest</u>	49.5	0.00	0.00	47.54
<u>Open Water</u>	0.07	0.00	0.00	0.00
<u>CVF Marsh/Emergent Wetland</u>	0.85	0.00	0.00	0.17
<u>Riparian Scrub</u>	3.21	0.25	0.00	2.96
<u>Disturbed Wetland</u>	0.07	0.00	0.00	0.00
<u>Urban/Developed Habitat</u>	0.8	0.00	0.00	0.00
<b><u>Totals (rounded)</u></b>	<b>1416.8</b>	<b>207.0</b>	<b>3.5</b>	<b>281.9</b>



## 2.2 Cultural Resources

An archaeological survey of the 1,416.5-acre Hoskings Ranch Proposed Project Site was conducted by Mary Robbins-Wade, who is on the County of San Diego's list of approved consultants for the preparation of cultural resource studies. The resulting report, entitled, Cultural Resources Assessment for the Hoskings Ranch Project, Julian, San Diego County, California TM 5312RPL3, Log. No. 03-10-005, with a revision date of July 2013, is included as Appendix C to this ~~DEIR~~FEIR. The current archaeological assessment is based upon the work of Professional Archaeology Associates that was done in 2003.

### 2.1.72.2.1 Existing Conditions

The Proposed Project is bounded by SR 78/79 on the north and large lot residential uses on the north and east. The Cleveland National Forest extends through the site on the southwest and west. The western boundaries abut private land holdings within the Cleveland National Forest.

Archaeological research has pieced together a succession of cultures that have developed in the San Diego region. The earliest accepted archaeological evidence of Native Americans in the San Diego area is the culture of San Dieguito people, dating back to approximately 10,000 years ago. The artifacts associated with this culture consist primarily of scrapers, scraper planes, choppers, large blades, and large projectile points. The San Dieguito culture was gradually replaced by the La Jolla culture, hunters and gatherers with a heavy emphasis on plant and plant seed processing, as evidenced by abundant manos and metates (grinding tools and sites). The Late Prehistoric period is represented by the San Luis Rey culture in northern San Diego and the Cuyamaca culture in the southern portion of the county. The boundary dividing these cultures runs approximately east to west through Escondido. The southern group, the Yuman-speaking *lipay-Kumeyaay*, occupied the region in which the Hoskings Ranch site is located.

The *lipay-Kumeyaay* subsistence economy included hunting, fishing and gathering, but the bulk of their diet was provided by plant foods. Settlements such as permanent villages and campsites are located in oak woodland valleys and catchment basins in the coastal zone, the foothills, the Peninsular Range and, to a lesser extent, in the desert beyond. Resource extraction and processing sites are clustered around the settlements, with temporary camps and extractive sites located in more distant areas. Seasonal movements within a communally-owned village territory were practiced; these movements were directly related to the changing availability of critical resources.

Spanish contact began with the Cabrillo expedition in 1542 which explored portions of the coast and the Channel Islands to the north. At the time of European contact, ancestors of the modern-day Kumeyaay Indians occupied an area that presently includes southern San Diego County, the southern two-thirds of Imperial County, and northern Baja California.

Between the 1860s and the early 1900s, successive waves of pioneers moved into more remote areas of the county in search of land and minerals. The discovery of gold in the Julian area during this period led to the historic settlement of San Diego's mountainous east county. The development of Julian and the surrounding areas closely followed this mining town development.

This brief history illustrates the rather high potential for finding cultural resources on the Proposed Project Site. Records searches for the area revealed approximately 150

potential pre-historic and historic archaeological sites of significance within a mile of the site. Most of the archaeological sites include bedrock milling features with and without artifacts. The historic archaeological resources include remnants of homesteads and ranches, as well as bridge and road foundations, feed troughs, and corrals.

The Proposed Project Site has been a cattle ranch since the 1880s, when the land was first homesteaded, and only ceased to be used for cattle within recent years.

#### **2.1.7.12.2.1.1 Regulatory Framework**

A number of criteria are used in demonstrating resource importance. Specifically, criteria outlined in the California Environmental Quality Act (CEQA), the Resource Protection Ordinance (RPO), and the San Diego County Local Register provide the guidance for making such a determination.

CEQA section 15064.5a provides criteria for determining that a resource is a historically significant resource. CEQA section 15064.5b defines the determination of 'substantial adverse change' to a resource which engenders impacts. Section 15064.5c of CEQA applies to effects on archaeological sites and contains additional provisions regarding archaeological sites. Sections 15064.5 (d) and (e) contain additional provisions regarding human remains as well as Native American human remains. The San Diego County Local Register of Historical Resources provides criteria for resources assessed for local importance, as opposed to statewide or regional importance.

The San Diego County RPO provides its own definitions for "Significant Prehistoric or Historic Sites."

Section 1.3, "Applicable Regulations," of the Cultural Resources report for the Proposed Project provides further details about these regulations.

#### **2.1.82.2.2 Analysis of Project Effects and Determination as to Significance**

The studies included record searches, field visits, and limited site testing. Previous studies of the site were supplemented with a review of historic maps and photographs.

Forty-five historic and archaeological resources were identified on the Hoskings Ranch site. Thirty-three sites are recorded as prehistoric (pre-contact) Native-American sites, seven are historic period resources, and five sites include both historic and prehistoric material. The historic resources include remnants of homesteads and ranches, as well as bridge and road foundations and water troughs.

In addition, several ranching features within the Proposed Project area have been recorded as a non-contiguous historic district (P-37-031748).

Analysis of Proposed Project effects relates to significance according to sets of criteria from both the RPO and CEQA. RPO significance is a higher level of significance than that which is recognized under CEQA. This includes sites or districts that are eligible for or listed on the National Register of Historic Places (not just the California Register of Historical Resources); locally or regionally unique cultural resources with a significant volume and range of data and material; traditional cultural properties; sites of ritual, ceremonial, or sacred value to an ethnic group; sites containing human remains. See pages 24 through 31 of the cultural resources assessment for the full list of criteria for each.

### 2.1.8-12.2.2.1 **Historical Resources**

#### Guidelines for the Determination of Significance

The guidelines for the Proposed Project were derived from the County of San Diego Guidelines for Determining Significance, Cultural Resources: Archaeological and Historic Resources. The Proposed Project would have a significant impact on historic resources if it:

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

#### Analysis

*Guideline 1: The project causes a substantial adverse change in the significance of an historical resource as defined in Section 15064.5 of the State CEQA Guidelines.*

Seven sites within the Proposed Project area have been recorded as historic period resources. See Table 2-2-1, "Historical Resources (CEQA)," at the end of this chapter for the list of resources.

CA-SDI-16,852H and CA-SDI-16,871H were recorded and documented and their remaining cultural value is not significance. P-37-025435, the car body, is not significant due to its lack of association with other sites or records. CA-SDI-16,853H, CA-SDI-16,345H, P-37-025402, and P-37-030448 will be located in open space and will not be directly or indirectly impacted by the project.

The Hoskings Ranch Rural Landscape District (P-37-031748) is proposed to recognize the importance of historic ranching features on the site and to provide for review of future actions by the Historic Site Board. The resource is made up of two pioneer farmstead archaeological sites (CA-SDI-7098/H and CA-SDI-16,881H), two ranching water development sites (CA-SDI-16,863H and CA-SDI-19,345H), one ranching erosion control site (P-37-030448), and a wooden cattle corral (P-37-125402). These features reflect human modification of the landscape, and can be linked thematically to specific processes in the evolution of the property to create a unified whole that provides an increased understanding of the region's history. The two house sites represent the pioneer settlement of San Diego County's backcountry during the late 19th century, while the other features represent the property's development and use as a cattle ranch.

These historic resources are located within areas proposed for open space protection. For those resources located in open space, long-term direct and indirect impacts are not significant. However, ~~B-~~brushing and grading activities associated with the construction of the Proposed Project could result in the discovery of previously unrecorded, potentially significant historical resources. Impacts to such cultural resources would be significant (**Impact CR-1**). Therefore, Guideline 1 is exceeded and mitigation is required.

*Guideline 2: Proposes activities or uses damaging to, and fails to preserve, significant historical cultural resources as defined by the Resource Protection Ordinance.*

See Table 2-2-2, “Historical Resources (RPO),” at the end of this chapter for a list of RPO-significant resources on the subject property.

The significant historic resources placed in open space protection (see table) would not receive direct, long-term impacts from implementation of the Proposed Project. However, brushing and grading activities associated with the construction of the Proposed Project could result in the discovery of previously unrecorded, potentially significant historical resources. Impacts to such cultural resources would be significant (**Impact CR-2**). Therefore, Guideline 2 is exceeded and mitigation is required.

#### 2.1.8.22.2.2.2 **Archaeological Resources**

##### Guidelines for the Determination of Impact Significance

The Proposed Project would have a significant impact on archaeological resources if it:

1. Causes a substantial adverse change in the significance of an archaeological resource as defined in Section 15064.5 of the State CEQA Guidelines.
2. Proposes activities or uses damaging to, and fails to preserve, significant cultural resources as defined by the Resource Protection Ordinance.
3. Disturbs any human remains, including those interred outside of formal cemeteries.

##### Analysis

The survey identified 33 prehistoric sites, and five sites that contain both historic and prehistoric elements. Thirty-four of these sites were either determined to be significant or are assumed significant in the absence of testing.

*Guideline 1: The project causes a substantial adverse change in the significance of an archaeological resource as defined in Section 15064.5 of the State CEQA Guidelines.*

Five sites within the Proposed Project area contain historic and prehistoric archaeological elements, as listed in Table 2-2-3, “Historical/Archaeological Resources (CEQA),” at the end of this chapter.

These historical/archaeological sites would be placed in open space and would not receive direct or indirect long-term impacts from the Proposed Project. However, brushing and grading activities associated with the construction of the Proposed Project could result in the discovery of previously unrecorded archaeological resources. Impacts to such cultural resources would be significant (**Impact CR-3**). Therefore, Guideline 1 is exceeded and mitigation is required.

CA-SDI-16,881 contains important information potential that is being lost as the site erodes away from exposure to the elements (**Impact CR-4**). Mitigation would be required.

Thirty-three prehistoric Native American archaeological sites have been identified within the Proposed Project area, as shown in Table 2-2-4, “Archaeological Resources (CEQA),” at the end of this chapter.

Impacts to the following sites have been reduced to a level below significant through their documentation and recordation (and testing if applicable): CA-SDI-7110, CA-



SDI-16,865, CA-SDI-16,873, CA-SDI-17,057. As such, these sites are unlikely to yield further information important to understanding the prehistoric occupation of the Proposed Project area.

Because these sites have been documented and recorded, they are determined to not be significant, Guideline 1 is not exceeded, impacts are not significant, and no mitigation is required.

*Guideline 2: The project proposes activities or uses damaging to, and fails to preserve, significant cultural resources as defined by the Resource Protection Ordinance.*

All of the historic/archaeological as well as archaeological-only resources listed under Guideline 1, above, are assumed RPO-significant in the absence of testing; four of these (CA-SDI-7098H, CA-SDI-16,854, CA-SDI-16,881H, and CA-SDI-16,863H) assume significance from being part of a historic ranching district. All of these resources are located in open space protection. However, brushing and grading activities associated with the construction of the Proposed Project could result in the discovery of previously unrecorded historical/archaeological or archaeological resources. Impacts to such cultural resources would be significant (**Impact CR-5**). Therefore, Guideline 1 is exceeded and mitigation is required.

*Guideline 3: Disturbs any human remains, including those interred outside of formal cemeteries*

None of the cultural resources identified on the Proposed Project Site contain human remains and therefore no impacts to human remains would result from the Proposed Project. However, brushing and grading activities associated with the construction of the Proposed Project could result in the discovery of previously unrecorded, potentially significant human remains. Impacts to such cultural resources would be significant. (**Impact CR-6**). Guideline 3 is exceeded and mitigation is required.

### **2.1.92.2.3 Cumulative Impact Analysis**

According to CEQA, the importance of cultural resources comes from the research value and the information that they contain. Therefore, the issue that must be explored in a cumulative analysis is the cumulative loss of information. For sites considered less than significant, there is no information, or the information is preserved through recordation, test excavations, and preservation of artifacts. Significant sites that are placed in protected open space easements avoid direct impacts to these cultural resources as well as preservation of their potential research data. Significant sites that are not placed within open space easements and which are directly impacted by the Proposed Project preserve the information through recordation, test excavations, and data recovery programs that would be presented in reports and filed with the County and SCIC.

Based on the current study, 45 historic and archaeological resources have been identified within the Proposed Project area. Thirty-three sites are recorded as prehistoric (pre-contact) Native-American sites, seven are historic period resources, and five sites include both historic and prehistoric material.

Four archaeological sites, through documentation and recordation, have been reduced to a level of no significance (CA-SDI-7110, CA-SDI-16,865, CA-SDI-16,873, and CA-SDI-17,057). One of these (CA-SDI-16,865) would be impacted by the Proposed Project. No mitigation would be required and impacts would not contribute to a cumulative effect. The three remaining archaeological resources are located within the open space.

One resource, CA-SDI-16,871, was found to not meet the criteria for listing in the California Register of Historical Resources through documentation and recordation.

The remaining 40 resources located onsite are RPO-significant. Two historic resources, CA-SDI-7105/7106 and CA-SDI-16,881/H, were determined to be RPO-significant by the archaeologist. The remaining 38 resources are assumed to be RPO-significant in the absence of testing. The majority of these are placed in open space protection, but possible effects from grading activities create the need for mitigation. One historic resource, P-37-030448, is not located within open space protection. Impacts are considered significant, as this site is an element of the significant historic ranching district (P-37-031748), and mitigation is required.

The Proposed Project's potentially significant impacts to cultural resources would be reduced below a level of significance by archaeological monitoring by a County-approved archaeologist and a Native American monitor during grading. Similarly, impacts to any undiscovered or buried potentially significant cultural resources located within the Proposed Project's boundaries would be reduced below a level of significance by similar measures. Thus, all archaeological impacts from the Proposed Project, when reviewed with related cumulative projects in the area, do not contribute to a cumulatively significant impact.

The Proposed Project is located in the west-facing slopes of the Volcan Mountains in the Julian Planning area. The cumulative study area encompasses an approximate one-mile radius to the east and west along this mountain range to incorporate areas of possible prehistoric occupancy. Case file research at the County of San Diego based on this cumulative study area was conducted to determine cumulative impacts. [The results of that research are shown in Table 1-1 of the DEIR/FEIR. Impacts are noted in the right hand column. The table indicates that of the 90 projects reviewed, five have the potential to impact cultural resources. No other projects were noted in the County of San Diego data base as having impacts to archaeology.](#) TPM 20863 has been withdrawn. MUP 72-460-72, a Girls Scout Camp, had impacts to archaeology that were mitigated with open space preservation. SP 03-015, the Leroux residence in downtown Julian, was studied but did not have significant impacts. [MUP 77-113, the Julian sewer plant, was studied but had no impacts to archaeology.](#) MUP 97-005, Red Horse Winery, had the potential to impact archaeology, but a Negative Declaration was issued. The Proposed Project itself has the potential to impact one resource, as mentioned above. Mitigation is proposed to reduce this impact to below significance. [County records for the 90 projects were reviewed. No other projects were noted in the County of San Diego data base as having impacts to archaeology.](#)

Cultural impacts have been avoided to the greatest extent possible in the region, evidenced by the small number of past, present, or anticipated projects in the 90 project study list that have cultural resource impacts. [Projects fully mitigate their impacts or use the project design to avoid impact altogether.](#) Future development in the cumulative study area would be subject to similar analysis and mitigation requirements pursuant to CEQA and RPO. Based on the compliance of the Proposed Project and related projects within the cultural resources cumulative study area with CEQA and RPO, and implementation of the project monitoring measures, the Proposed Project would not result in a significant contribution to cumulative impacts for the issue of cultural resources and impacts would be less than significant.

## **2.1.10.2.4 Significance of Impact Prior to Mitigation**

The following is a brief summary of all direct and indirect impacts which were determined to be significant by the analysis provided in the Cultural Resources Assessment (Appendix C).

### **2.1.10.12.2.4.1 Impacts to Historical Resources**

- CR-1      Historic resources, as defined in Section 15064.5 of the State CEQA Guidelines, located within open space would not suffer direct impacts from the Proposed Project. However, brushing and grading activities associated with the construction of the Proposed Project could result in the discovery of previously unrecorded, potentially significant historical resources. Impacts to such cultural resources are significant. Mitigation is required.
- CR-2      RPO-significant resources located in areas that are proposed for open space protection. 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. Impacts to such cultural resources would be significant.

### **2.1.10.22.2.4.2 Impacts to Archaeological Resources**

- CR-3      Historical/archaeological sites located in areas that are proposed for open space would not receive direct or indirect long-term impacts from the Proposed Project. However, brushing and grading activities associated with the construction of the Proposed Project could result in the discovery of previously unrecorded historical/archaeological resources. Impacts to such cultural resources would be 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 away from exposure to the elements.
- CR-5      All of the study's historical/archaeological and archaeological resources are assumed to be RPO-significant in the absence of testing; a few also assume significance in association with a historic ranching district. These resources are all located in areas proposed for open space protection and would not receive long-term direct and indirect impacts from the Proposed 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 archaeological resources. Impacts to such cultural resources would be significant.
- CR-6      None of the cultural resources identified on the Proposed Project Site contain human remains. However, brushing and grading activities associated with the construction of the Proposed Project could result in the discovery of previously unrecorded, potentially significant human remains. Impacts to such cultural resources would be significant.

## **2.1.11.2.2.5 Mitigation**

### **2.1.11.2.2.5.1 M-CR-1, M-CR-2, M-CR-3, M-CR-5, M-CR-6**

A monitoring program would be implemented for any grading or other ground-disturbing activity. The monitoring program would be required not only for ground-disturbing activities as part of the Tentative Map, but also any development that occurs subsequent to approval of the TM. The monitoring and data recovery program must be provided to the satisfaction of the Director of Planning and Development Services, and must include monitoring by a County-approved archaeologist and a Native American monitor. Appendix C provides details about the requirements of the monitoring program which address data discovery, recovery, and documentation; notes to the Grading Plan; and necessary sign-offs and documentation proving adherence to the program.

The archaeological consultant, County staff, and Native American representatives will work together to determine the disposition of any Native American cultural material collected, determining if some material would be repatriated rather than curated, taking into account the definitions under NAGPRA. Historic era cultural material collected would be curated.

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

The monitoring program and the fencing and signage plan designed for the Proposed Project as described above would effectively mitigate all impacts to below a level of significance because they would deter intrusions into protected areas. No further mitigation would be required.

### **2.1.11.2.2.5.2 M-CR-24**

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

## **2.1.12.2.6 Conclusion**

For the current study, a County-approved archaeological firm reviewed previous surveys and assessment reports, conducted site visits and limited testing, and updated the archaeological report for the Proposed Project.

Forty-five historic and archaeological resources were identified within the Proposed Project area. Thirty-three of these sites were recorded as prehistoric (pre-contact) Native-American sites, seven are historic period resources, and five sites include both historic and prehistoric material.

Impacts could occur during grading activities because additional resources may be uncovered. To avoid impacts to known and as-yet-undiscovered cultural resources during grading activities, an archaeological ~~and~~ Native American monitor is required to conduct archaeologicalgrading monitoring to ensure no additional resource areas are



damaged. Temporary fencing and signage would be installed to deter inadvertent intrusions to the open space by construction workers or equipment.

In the long-term, open space is an effective design feature because resources would be retained in an undisturbed state in a protected area.

Impacts to cultural resources are not significant because the project has avoided resources, fully mitigated impacts, and has provided open space protections for resources. One resource, CA-SDI-16,881/H, is eroding naturally, and would continue to do so after Project implementation. The Proposed Project would be required to implement a data recovery program which would mitigate for all impacts to this resource. Monitoring would ensure that unknown cultural resources would be adequately documented, and curated [or repatriated](#) if necessary, because monitors would halt grading and evaluate resources, if any are found.

Cumulative impacts are not significant because the Proposed Project and other cumulative projects have avoided or preserved resources on their sites. Impacts are mitigated to below a level of significance.

This page intentionally left blank

### Historical Resources (CEQA)

CA-SDI-16, <del>852H</del> <u>882H</u>	<del>Quarry site for mining red earth for bricks; no artifacts observed</del> <u>School site</u>
CA-SDI-16,853H	Scatter of sun-purpled glass and porcelain
CA-SDI-16,871H	Mining pit, possibly looking for gold.
CA-SDI-19,345H	Three water troughs, rock wall to stabilize pad
P-37-025402	Starr Corral; unique construction from railroad boxcars
P-37-025435	Partial car body and association parts
P-37-030448	Historic water control features (rock walls) in main drainage and two minor cuts feeding the main drainage; connects with well at CA-SDI-16,863/H

### Historical Resources (RPO)

Resource #	Status of significance	Placed in Open Space
CA-SDI-16,853H	Assumed significant in the absence of testing.	Yes
CA-SDI-19,345H	Not individually significant, but part of a significant historic ranching district.	Yes
P-37-025402	Determined to be significant; also part of significant historic ranching district.	Yes
P-37-030448	Determined to be significant; also part of significant historic ranching district.	No



### Historical/Archaeological Resources (CEQA)

CA-SDI-7098H	Bedrock Milling Features (BMF) with ground stone, flaked stone, Tizon Brown Ware, and historic components of the McCain Residence homesite.
CA-SDI-16,863/H	This site includes a well at a natural spring and is part of the ranching features that are proposed as noncontiguous historic district, which would make them significant resources as defined by CEQA.
CA-SDI-16,881/H	BRMs and lithic scatter. Historic component: Late 19th century/early 20th century homestead site with landscape features, foundation, wall, trash dump, and scattered historic artifacts.
CA-SDI-16,882/H	Small lithic and pottery scatter. Historic component: site of early 20th century Orinoco School.
CA-SDI-19,344	BRMs with flakes, amethyst glass.

## Archaeological Resources (CEQA)

CA-SDI-7102	This is a large habitation site with a range of artifact types. The historical aspect of this site meets the criteria of CEQA and is eligible for listing in the California Register of Historical Resources.
CA-SDI-7103	BRMs along Orinoco Creek; flakes found at one feature.
CA-SDI-7104	BRMs; no artifacts observed.
CA-SDI-7105/7106	BRMs
CA-SDI-7109	This a large habitation site. The historical aspect of this site meets the criteria of CEQA and is eligible for listing in the California Register of Historical Resources.
CA-SDI-7110	Isolated scraper.
CA-SDI-16,851	BRMs with flake and Tizon Brown Ware.
CA-SDI-16,854	BRMs with ground stone, flakes, and hammerstones.
CA-SDI-16,855/ CA-SDI-16,856/ CA-SDI-16,857	BRMs with ground stone, flaked stone (including obsidian), Tizon Brown Ware, historics.
CA-SDI-16,858	BRMs with a mano.
CA-SDI-16,859	BRMs with a flake.
CA-SDI-16,860	BRMs, no artifacts observed.
CA-SDI-16,861	BRMs with flakes
CA-SDI-16,862	BRMs with a flake.
CA-SDI-16,864	MRMs with mano and Tizon Brown Ware.
CA-SDI-16,865	BRM with a flake.
CA-SDI-16,866	BRMs with a flake and Tizon Brown Ware.
CA-SDI-16,867	BRMs with no artifacts observed.
CA-SDI-16,868	BRMs with Tizon Flat Ware.
CA-SDI-16,869	BRM with no artifacts observed.
CA-SDI-16,870	BRMs with manos, flakes, and Tizon Brown Ware.
CA-SDI-16,872	BRMs with no artifacts observed.
CA-SDI-16,873	BRM with a flake.
CA-SDI-16,874	BRMs with no artifacts observed.
CA-SDI-16,875	BRMs with manos and Tizon Brown Ware.
CA-SDI-16,876/ CA-SDI-16,877	Lithic scatters and BRMs.
CA-SDI-16,878	Habitation debris, including flaked stone, Desert Side-Notched point, Tizon Brown Ware, Colorado Buff Ware, incised fired clay whale effigy.
CA-SDI-16,879	BRMs with no artifacts observed.
CA-SDI-16,880	BRM with Tizon Brown Ware.
CA-SDI-17,057	BRM with no artifacts observed.
CA-SDI-19,342	BRMs with flakes.
CA-SDI-19,343	BRMs with no artifacts observed.
CA-SDI-19,346	BRMs with no artifacts observed.

### **2.22.3 Traffic**

Traffic impact analysis was conducted by Arnold Torma of KOA Corporation, who is on the County-approved consultants list for the preparation of traffic analyses. The resulting report, entitled *Hoskings Ranch Traffic Impact Study TM5312*, dated September 2012, is included as Appendix D of the ~~DEIR~~FEIR. A memo updating agricultural traffic numbers was provided on November 14, 2014 and is included at Appendix H of that study.

#### **2.2.12.3.1 Existing Conditions**

The Proposed Project proposes the division of 1,416.5 acres into 24 agricultural lots ranging in size from 40.10 to 196.02 gross acres each and is located in the Julian Community Planning Area. The major roadways in the area are State Route 78/79 (SR 78/79) and Pine Hills Road. Hoskings Ranch Road and Daley Flat Road, private roads, also serve the site. Figure 2-3-1, "Existing Circulation Network," illustrates the local and regional circulation network near the Proposed Project Site.

The Proposed Project's frontage roads are: SR-78/79 and Pine Hills Road. Hoskings Ranch Road is an existing offsite road that was part of the analysis. Hoskings Ranch Road/Daley Flat Road and Orinoco Road are existing onsite private roads that were included in the analysis. The Proposed Project proposes four new private roads within its boundaries: Tenaya Road, Ute Peak Lane, Bear Run Lane, and Deer Run Lane.

The Proposed Project would take access to local roads via Hoskings Ranch Road onto SR-78/79 and onto Pine Hills Road via Tenaya Road.

SR 78/79 is a two-lane road with a posted speed limit of 55 mph. It has a Level of Service (LOS) E capacity of 16,200 Average Daily Trips (ADT), and currently carries 3,672 ADT east of Pine Hills Road. It was found to function at LOS B.

Pine Hills Road is a two-lane County-maintained road with an unposted speed limit of 55 miles per hour (mph). This road has an LOS E capacity of 16,200 ADT, and currently carries 1,651 ADT south of SR 78/79. It was found to function at LOS A.

Hoskings Ranch Road and Daley Flat Road are paved private roads. Hoskings Ranch Road at SR 78/79 is currently gated and has a phone box and key pad mechanism to provide access to residents and visitors. Levels of Service are not applicable to Hoskings Ranch Road and Daley Flat Road since their primary purpose is to serve abutting properties and not to carry through traffic.

Peak-hour intersection performance measures the length of delays at intersections when they are experiencing the highest volume of use. The three intersections with public roads closest to the Proposed Project are Hoskings Ranch Road/SR 78/79, Pine Hills Road/SR 78/79, and Pine Hills Road/Tenaya Road. All intersections currently operate at a LOS B or better.

#### **2.2.1.12.3.1.1 Regulatory Framework**

The study methodology and analysis for transportation is based on the County of San Diego Report Format and Content Requirements (Transportation and Traffic) and the County of San Diego Guidelines for Determining Significance (Transportation and Traffic).

The guidelines are used to determine the Proposed Project's conformance with the County of San Diego Public Road Standards, the San Diego County Standards for Private Streets Standards, and County of San Diego Public Facility Element policies

and evaluate whether a project's impacts are perceptible to the average driver. The issues under analysis are Level of Service (LOS) for road segments and intersections, and sight-distance.

### **2.2.22.3.2 Analysis of Project Effects and Determination as to Significance**

The traffic impact analysis is based on the County of San Diego, Report Format & Content Requirements: Transportation and Traffic and the County of San Diego, Guidelines for the Determination of Significance: Transportation and Traffic, dated February 2010.

County of San Diego daily traffic volume standards were used for the analysis of roadway segments. The Highway Capacity Manual analysis method was used for evaluating unsignalized intersections. Traffic count data was obtained from counts conducted in February 2010 and January 2011.

### **2.2.2.12.3.2.1 Project Trip Generation**

Trip generation is a measure or forecast of the number of trips that begin or end at the Proposed Project Site. All or part of these trips would result in traffic increases on the streets where they occur. The traffic generated is a function of the extent and type of development proposed for the site. The Proposed Project proposes agricultural activity which may result in 24 residences. Both activities would generate ADT.

Table 2-3-1 summarizes the trips generated by the Proposed Project:

**Table 2-3-1. Project Trip Generation**

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

Note: Numbers may not total due to rounding

As shown, a project of 24 residences would add 336-288 ADT to the circulation network, with 27-23 trips occurring during the AM peak hour, and 34-29 trips occurring during the PM peak hour. No peak hour agricultural traffic is anticipated as these activities take place at random times of the day and are not linked to rush hour traffic.

### **2.2.2.22.3.2.2 Project Trip Distribution**

Trip distribution identified the probable destinations, directions, or traffic routes that project-related traffic would likely affect. In this case, the Proposed Project trip distribution was estimated from observed traffic patterns and considerations of surrounding land uses. Figure 2-3-2, "Project Trip Distribution," shows the Proposed



Project trip generation. As shown, it is expected that ~~63-54~~ percent of traffic would use the Hoskings Ranch Road/Daley Flat Road exit, and ~~37-47~~ percent would use the Tenaya/Pine Hills ~~R~~road exit or their direct access onto Pine Hills Road, with ~~75~~ 65 percent of traffic ultimately driving toward Ramona, ~~24-30~~ percent toward Julian, and ~~four-five~~ percent toward the Pine Hills community.

### 2.2.2.32.3.2.3 **Road Segment Analysis**

The Existing Plus Project scenario reflects traffic volumes when expected Proposed Project traffic is added to existing traffic volumes. Table 2-3-2, "Existing Plus Project Roadway Segment Conditions," summarizes the existing roadway segments both with and without the Proposed Project.

#### Guidelines for the Determination of Significance

The Proposed Project would have a significant impact on road segments if:

- It would increase traffic by 200 ADT on an LOS E roadway, or if it would increase traffic by 100 ADT on an LOS F roadway.

#### Analysis

*Guideline 1: The project would have a significant effect on road segments if it would increase traffic by 200 ADT on an LOS E roadway, or if it would increase traffic by 100 ADT on an LOS F roadway.*

The results of the analysis are shown in Table 2-3-2. With the addition of Proposed Project traffic to existing traffic levels, roadway segments operate at LOS C or better both with or without the Proposed Project. Guideline 1 is not exceeded and impacts are not significant. Mitigation is not required.

### 2.2.2.42.3.2.4 **Peak Hour Intersection Performance Analysis**

#### Guidelines for the Determination of Significance

The Proposed Project would have a significant effect on intersections if:

- It exceeds specific thresholds on either an LOS E or an LOS F roadway. The specific thresholds for signalized and unsignalized intersections are:

**Table 2-3-3 Allowable Increase of Congested Intersections**

Intersection LOS	Signalized	Unsignalized
LOS E	Delay of 2 seconds	20 peak hour trips on a critical movement
LOS F	Delay of 1 second or 5 peak hour trips on a critical movement	5 peak hour trips on a critical movement

#### Analysis

*Guideline 2: The project would have a significant effect on intersections if it exceeds specific thresholds on either an LOS E or an LOS F roadway.*

The results of the analysis are shown in Table 2-3-4, "Existing Plus Project Intersection Conditions." All intersections operate at LOS B or better in both the morning and evening peak hours with or without the Proposed Project. Traffic is not

directed to roadways operating at either LOS E or F. Guideline 2 is not exceeded and impacts are not significant. Mitigation is not required.

#### **2.2.2.52.3.2.5 Hazards Due to an Existing Transportation Design Feature**

Increased traffic generated or redistributed by a proposed project may cause a significant traffic operational impact to an existing transportation design feature and could result in potential hazards.

##### **Guidelines for the Determination of Significance**

The Proposed Project would have a significant effect if:

- Design features/physical configurations of access roads may adversely affect the safe movement of all users along the roadway.
- The percentage or magnitude of increased traffic on the road due to the proposed project may affect the safety of the roadway.
- The physical conditions of the project site and surrounding area, such as curves, slopes, walls, landscaping or other barriers, may result in conflicts with other users or stationary objects.
- It does not conform with existing and proposed roads to the requirements of the private or public road standards, as possible.

##### **Analysis**

*Guideline 1: The project would have a significant traffic operational impact to an existing transportation design feature and result in potential hazards if its design features/physical configurations of access roads adversely impact the safe movement of all users along the roadway.*

*Guideline 3: The project would have a significant traffic operational impact to an existing transportation design feature and result in potential hazards if the physical conditions of the project site and surrounding area, such as curves, slopes, walls, landscaping or other barriers, may result in conflicts with other users or stationary objects.*

The San Diego County Standards for Private Roads defers to the American Association of State Highway and Transportation Officials (AASHTO) standards for stopping sight distance requirements. The standards used in this analysis were obtained from AASHTO's A Policy on Geometric Design of Highways and Streets (2004).

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

Sight distance is the continuous length of roadway visible to the driver sufficient enough to assess an oncoming vehicle to avoid collision and perform a maneuver without requiring through traffic to radically alter their speed. A speed survey was conducted for vehicles traveling northbound/southbound on Pine Hills Road and vehicles traveling eastbound/westbound on SR-78/79 at the Proposed Project access intersections; the analysis can be found in Appendix F of the traffic study. It was determined that the operational speed on Pine Hills Road at the Proposed

Project entry is 48 mph for northbound traffic and 47 mph for southbound traffic. For SR 78/79 at Hoskings Ranch road, the operating speed is 58 mph for both eastbound and westbound traffic. According to the County of San Diego Public Road Standards, the minimum intersection sight distance for 47, 48 and 58 mph are 470 feet, 480 feet and 580 feet, respectively. According to AASHTO, the minimum intersection sight distance for 43, 44 and 58 mph are 520 feet, 530 feet and 640 feet, respectively.

Table 2-3-5, "Existing Configuration Sight Distance Summary," summarizes the results of the sight-distance analysis for the Proposed Project access points, which are discussed below.

#### Corner Sight Distance

All movements have adequate corner sight distance except for:

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

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

From the Pine Hills Road looking right (Movement "B slows for A"), a distance of 580 feet of unobstructed visibility is required; the Proposed Project currently has 535 feet available. The sight distance is potentially restricted by the existing embankment on the south side of the horizontal curve in the road, as shown in the aerial photograph that is included in Figure 2-3-3, "Sight Distance Constraints." This may be acceptable because stopping sight distance is adequate for this maneuver. ~~However, A~~ adequate corner sight distance is potentially restricted by ~~can be met if the trees on the south side of the horizontal curve. -were trimmed or removed.~~ This would ~~be required as~~ a design consideration for the Proposed Project, and would reduce all impacts to not significant.

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

Figure 2-3-3, "Sight Distance Constraints," further analyzed these intersections by locating a spotter at the appropriate sight distance from the intersection. The graphic shows the spotter's orange vest is visible from all approaches, indicating that adequate sight distance exists. While there are no major obstructions, to maintain a conservative analysis, any vegetation that obstructs sight distance would be removed.

#### Stopping Sight Distance

All movements were determined to have adequate stopping sight distance.

Because the listed design considerations would reduce impacts to less than significant for corner sight distance, and because stopping sight-distance

requirements are met, guidelines 1 and 3 are not exceeded. No mitigation is required.

*Guideline 2: The project would have a significant traffic operational impact to an existing transportation design feature and result in potential hazards if the percentage or magnitude of increased traffic on the road due to the proposed project may affect the safety of the roadway.*

The Proposed Project's increased traffic on the road would not affect the safety of the roadway because the roadway would continue to function at a LOS A. Guideline 2 is not exceeded and impacts are not significant. Mitigation is not required.

*Guideline 4: The project would have a significant effect to an existing transportation design feature and result in potential hazards if it does not conform to existing and proposed roads to the requirements of the private or public road standards.*

The Proposed Project roads would be built to private road standards. Guideline 4 is not exceeded and impacts are not significant. Mitigation is not required.

### **2.2.2.6 2.3.2.6 Hazards to Pedestrians or Bicyclists**

Increased traffic generated or redistributed by a proposed project may cause a significant traffic operational impact to pedestrians or bicyclists and result in potential hazards.

#### **Guidelines for the Determination of Significance**

The Proposed Project would have a significant traffic operational impact on pedestrians or bicyclists considering the following factors:

- Design features/physical configurations on a road segment or at an intersection that may adversely affect the visibility of pedestrians or bicyclists to drivers entering and exiting the site, and the visibility of cars to pedestrians and bicyclists.
- The amount of pedestrian activity at the project access points that may adversely affect pedestrian safety.
- The preclusion or substantial hindrance of the provision of a planned bike lane or pedestrian facility on a roadway adjacent to the project site.
- The percentage or magnitude of increased traffic on the road due to the proposed project that may adversely affect pedestrian and bicycle safety.
- The physical conditions of the project site and surrounding area, such as curves, slopes, walls, landscaping or other barriers that may result in vehicle/pedestrian, vehicle/bicycle conflicts.
- Does not conform with existing and proposed roads to the requirements of the private or public road standards, as applicable.
- The potential for a substantial increase in pedestrian or bicycle activity without the presence of adequate facilities.

#### **Analysis**

*Guideline 1: The project would have a significant traffic operational impact on pedestrians or bicyclists if the design features/physical configurations on a road segment or at an intersection adversely affect the visibility of pedestrians or bicyclists*



*to drivers entering and exiting the site, and the visibility of cars to pedestrians and bicyclists.*

*Guideline 5: The project would have a significant effect if the physical conditions of the project site and surrounding area, such as curves, slopes, walls, landscaping or other barriers that may result in vehicle/pedestrian, vehicle/bicycle conflicts.*

As described in the analysis above, three sight-distance studies were performed at intersections at or near the Proposed Project. The analysis shows that corner sight-distance cannot currently be met in two instances:

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

Further analysis shown in Figure 2-3-3 shows that no major obstructions exist.

However, ~~the~~ vegetation which obstructs the view would be trimmed in order to provide the needed visibility. The Proposed Project is required to remove the vegetation in these two locations as design considerations. Therefore, no impacts are anticipated as a result. Guideline 1 is not exceeded. No mitigation is required.

*Guideline 2: The project would have a significant traffic operational impact on pedestrians or bicyclists if the amount of pedestrian activity at the project access points that may adversely affect pedestrian safety.*

Trails do not exist nor are proposed as part of the project. Therefore, pedestrian activity would be minimal. Additionally, due to the large scale of the Proposed Project lots, pedestrian traffic along the Proposed Project's access points is not likely to occur. Therefore, Guideline 2 is not exceeded and impacts are not significant. Mitigation is not required.

*Guideline 3: The project would have a significant traffic operational impact on pedestrians or bicyclists if the preclusion or substantial hindrance of the provision of a planned bike lane or pedestrian facility on a roadway adjacent to the project site.*

The Proposed Project would not hinder the improvement of existing roadways, including bike lanes, adjacent to the Proposed Project Site. Adequate right of way is being dedicated to allow the addition of bike lanes should they be required. No pedestrian facilities currently exist nor are any proposed on a roadway adjacent to the Proposed Project Site. Additionally, due to the large scale of the Proposed Project lots, pedestrian and bicycling traffic along the Proposed Project's frontage is not likely to occur. Guideline 3 is not exceeded and impacts are not significant. Mitigation is not required.

*Guideline 4: The project would have a significant traffic operational impact on pedestrians or bicyclists if the percentage or magnitude of increased traffic on the road due to the proposed project that may adversely affect pedestrian and bicycle safety.*

The Proposed Project's increased traffic on the road would not affect the safety of pedestrians or bicyclists because the roadway would continue to function at a LOS A. Guideline 4 is not exceeded and impacts are not significant. Mitigation is not required.

*Guideline 6: The project would have a significant traffic operational impact on pedestrians or bicyclists if does not conform with existing and proposed roads to the requirements of the private or public road standards, as applicable.*

Proposed Project entry would conform to private road standards. Guideline 6 is not exceeded and impacts are not significant. Mitigation is not required.

*Guideline 7: The project would have a significant traffic operational impact on pedestrians or bicyclists if the potential for a substantial increase in pedestrian or bicycle activity without the presence of adequate facilities.*

No increase in pedestrian or bicycle activity is anticipated; therefore, adequate facilities are not required. Due to the large scale of the Proposed Project lots, pedestrian and bicycling traffic along the Proposed Project's frontage is not likely to occur. Therefore, Guideline 7 is not exceeded and impacts are not significant. Mitigation is not required.

### **2.2.2.7 2.3.2.7 Project Access and Circulation**

#### **Guidelines for the Determination of Significance**

The Proposed Project would have a significant effect if:

- The sight-distance at any intersection used or proposed for project access does not meet minimum requirements established in the County of San Diego Public Road Standards for project access.

#### **Analysis**

*Guideline 1: The project would have a significant effect if the sight distance at any intersection used or proposed for project access does not meet minimum requirements established in the County of San Diego Public Road Standards for project access.*

The Proposed Project would take access to local roads at two points: Hoskings Ranch Road at SR 78/79, and Tenaya Road at Pine Hills Road (Tenaya Road is not yet built).

As described in both previous sections, the traffic study concludes that the two intersections which do not meet corner sight-distance can be modified, through vegetation removal to comply with sight-distance requirements. With these design considerations for the Proposed Project, no impacts are anticipated. Guideline 1 is not exceeded, and no mitigation is required.

### **2.2.32.3.3 Cumulative Impacts**

The Proposed Project generates 1,278 daily trips. Some of these trips would use roadways that were found in the course of the cumulative analysis to operate at inadequate levels of service. See the traffic impact report Appendix D for an analysis of cumulative impacts. The Proposed Project would therefore contribute to a significant cumulative impact (**Impact TR-1**) and mitigation is required.

#### **2.2.42.3.4 Significance of Impacts Prior to Mitigation**

##### **2.2.4.12.3.4.1 TR-1**

In the cumulative condition, the Proposed Project contributes vehicle trips to roadways that operate at inadequate levels of service. Impacts are significant and mitigation is required.

#### **2.2.52.3.5 Mitigation**

##### **2.2.5.12.3.5.1 M-TR-1**

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

#### **2.2.62.3.6 Conclusion**

Analysis of existing roadway segment and peak-hour intersection performance was conducted by a County-approved consultant. The analysis found that all roadway segments and intersections are currently operating a LOS C or better. The LOS for road segments and intersections would continue to operate at this level with the addition of project traffic. Impacts from Proposed Project traffic are not significant.

Corner sight-distance was found to be inadequate at two intersections.

For the left turn from Pine Hills Road onto SR-78/79, sight distance is restricted by the existing embankment on the south side of the horizontal curve in the road. This may be acceptable because stopping sight distance is adequate for this maneuver. However, adequate corner sight distance can be met if the trees on the south side of the horizontal curve were trimmed or removed.

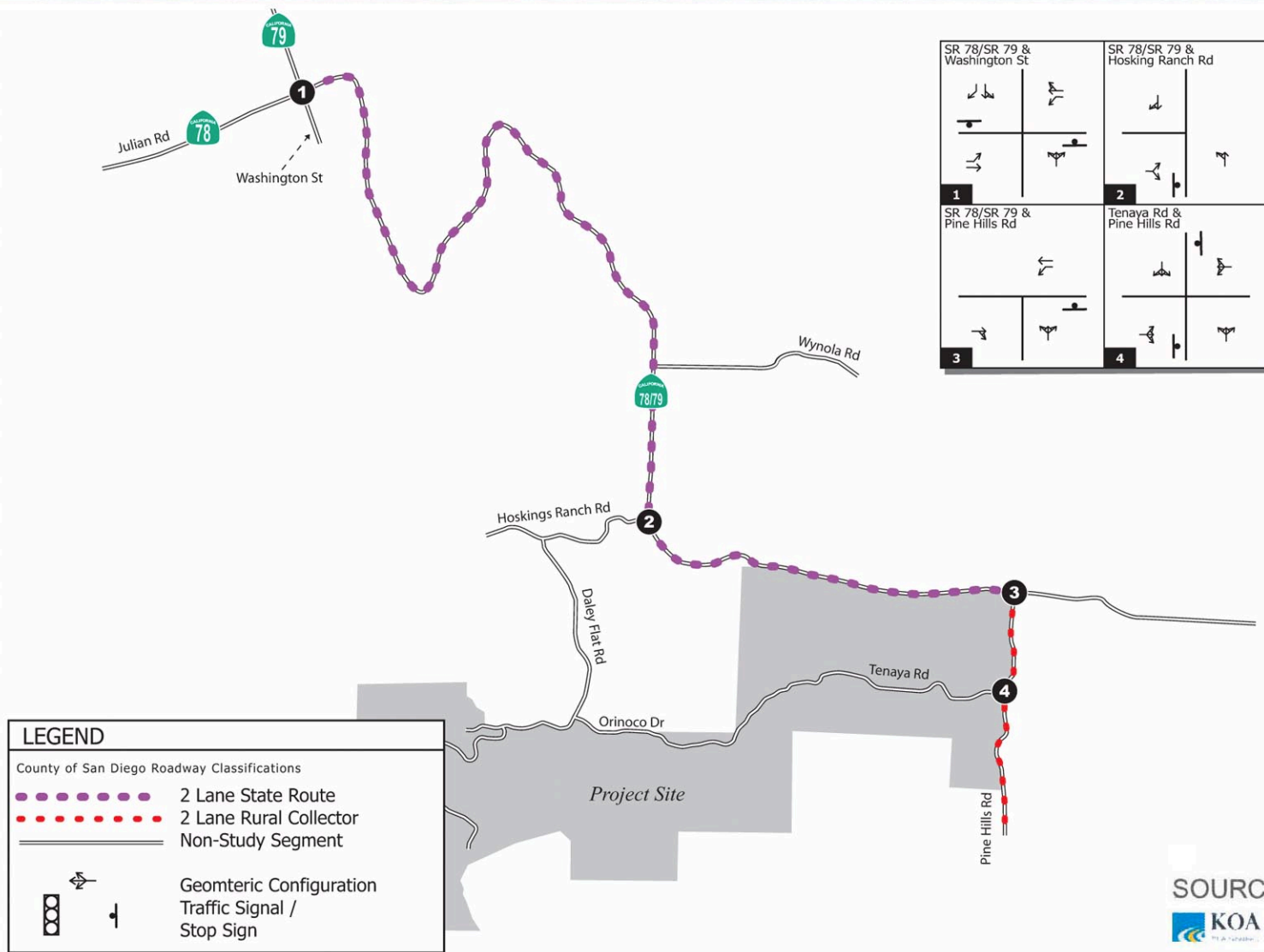
For the right turn from Tenaya Road onto pine Hills Road, sight distance is restricted by trees on the west side of the horizontal curve in the road. However, adequate corner sight distance can be met if the trees on the west side of Pine Hills Road on/adjacent to the applicant's property were removed, allowing for corner sight distance to increase to 745 feet.

Vegetation removal in these two locations would be required as design considerations for the Proposed Project. No impacts are anticipated, and no mitigation required.

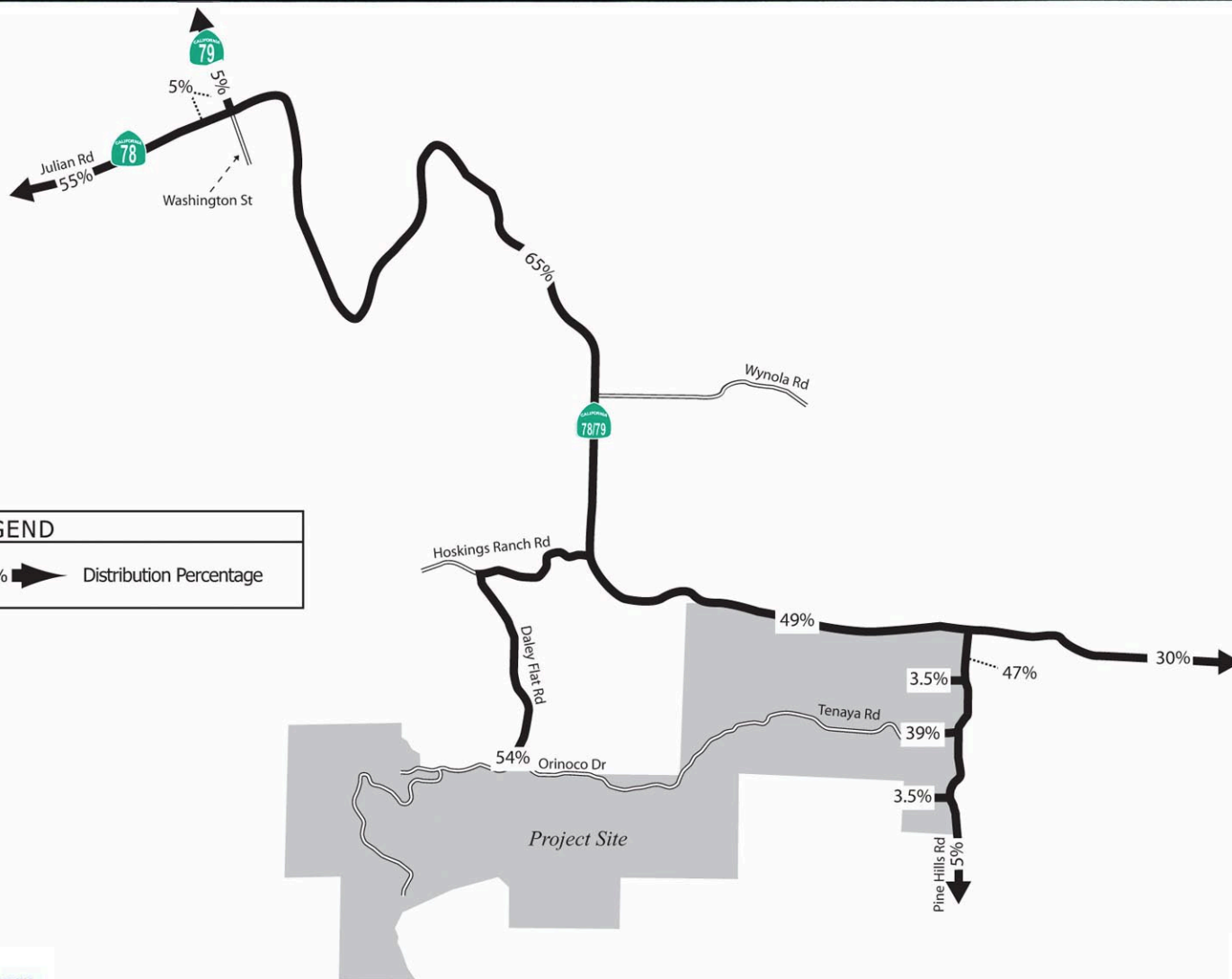
In the cumulative conditions, the Proposed Project contributes vehicle trips to roadways that operate at inadequate levels of service. Impacts from cumulative traffic are significant. The County of San Diego has adopted an overarching programmatic approach to address existing and projected future road deficiencies in the unincorporated area of San Diego County. This program includes the adoption of a Transportation Impact Fee (TIF) to fund improvements to roadways in order to mitigate potential cumulative impacts anticipated by traffic from future development. Mitigation in the form of a TIF fee would fully mitigate this impact because the fees would be used to improve area roadways where impacts occur to a level below significance.

This page intentionally left blank





Existing Circulation Network





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

Photo 1: "A" looking to "C"  
Minor Road vehicle looking to Major Road vehicle



Photo 2: "C" looking to "A"  
Major Road vehicle looking to Minor Road vehicle



Photo 1 (zoom): "A" looking to "C"  
Minor Road vehicle looking to Major Road vehicle



Photo 2 (zoom): "C" looking to "A"  
Major Road vehicle looking to Minor Road vehicle



Conceptual Layout of Clear Sight Triangle   Existing = 400 feet



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 "B"  
Minor Road vehicle looking to Major Road vehicle



Photo 2: "B" looking to "A"  
Major Road vehicle looking to Minor Road vehicle



Photo 1 (zoom): "A" looking to "B"  
Minor Road vehicle looking to Major Road vehicle



Photo 2 (zoom): "B" looking to "A"  
Major Road vehicle looking to Minor Road vehicle



Conceptual Layout of Clear Sight Triangle   Existing = 535 feet



Source: KOA



### Existing Plus Project Roadway Segment Conditions

Roadway Segment	Lanes/ Class	LOS E Capacity	Existing			Existing + Project			Δ Traffic	Δ v/c	Direct Impact?	CMP Impact?	
			ADT	V/C	LOS	ADT	V/C	LOS					
SR-78/79													
SR-79/Washington St to Hoskings Ranch	2SR	22,900	3,561	0.156	C	4,393	0.192	C	832	0.036	No	No	
Hoskings Ranch Rd to Pine	2SR	22,900	4,095	0.179	C	4,719	0.206	C	624	0.027	No	No	
Pine Hills Rd													
south of SR-78/79	2RC	16,200	1,651	0.102	A	2,243	0.138	B	592	0.037	No	No	

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



### Existing Plus Project Roadway Segment Conditions

**Table  
2-3-2**



### Existing Plus Project Intersection Conditions

Intersection	Peak Hour	Existing		Existing + Project		$\Delta$ Trips	$\Delta$ Delay	Direct Impact ?	CMP Impact ?
		Delay	LOS	Delay	LOS				
1. SR-78 & SR-79/Washington St <sup>1</sup>	AM	10.4	B	10.5	B	NA	0.1	No	No
	PM	13.0	B	13.2	B	NA	0.2	No	No
2. SR-78/79 & Hoskings Ranch Rd <sup>1</sup>	AM	9.0	A	9.7	A	NA	0.7	No	No
	PM	9.8	A	10.1	B	NA	0.3	No	No
3. SR-78/79 & Pine Hills Rd <sup>1</sup>	AM	10.1	B	10.3	B	NA	0.2	No	No
	PM	10.4	B	10.6	B	NA	0.2	No	No
4. Tenaya Rd & Pine Hills Rd <sup>1</sup>	AM	8.8	A	9.5	A	NA	0.7	No	No
	PM	8.6	A	9.5	A	NA	0.9	No	No

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

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



### Existing Plus Project Intersection Conditions

**Table  
2-3-4**

Maneuver	Prevailing Speed	Existing Sight Distance (feet)				
		Type	Evasive Action	Needed	Available	Adequate?
Hoskings Ranch Road / SR-78/79						
Left turn from Hoskings Ranch Road looking right	58 MPH	Corner	B slows for A	580* / 640**	710	Yes
		Stopping	B stops for A	540	585	Yes
Right turn from Hoskings Ranch Road looking left	58 MPH	Corner	C slows for A	580* / 640**	985	Yes
		Stopping	C stops for A	540	750	Yes
EB Through on SR-78/79 looking east	58 MPH	Corner	----	----	----	----
		Stopping	B stops for D	540	750	Yes
Pine Hills Road / SR-78/79						
Left turn from Pine Hills Road looking right	58 MPH	Corner	B slows for A	580* / 640**	535	No
		Stopping	B stops for A	540	950	Yes
Right turn from Pine Hills Road looking left	58 MPH	Corner	C slows for A	580* / 640**	750	Yes
		Stopping	C stops for A	540	750	Yes
EB Through on SR-78/79 looking east	58 MPH	Corner	----	----	----	----
		Stopping	B stops for D	540	750	Yes
Tenaya Road / Pine Hills Road						
Left turn from Tenaya Road looking right	48 MPH	Corner	B slows for A	440* / 530**	665	Yes
		Stopping	B stops for A	400	670	Yes
Right turn from Tenaya Road looking left	47 MPH	Corner	C slows for A	430* / 520**	400	No
		Stopping	C stops for A	385	745	Yes
SB Through on Pine Hills Road looking south	47 MPH	Corner	----	----	----	----
		Stopping	B stops for D	385	725	Yes

\* Per County of San Diego guidelines

\*\* Per AASHTO guidelines



## Existing Configuration Sight Distance Summary

**Table  
2-3-5**

## CHAPTER 3.0 ENVIRONMENTAL EFFECTS FOUND NOT TO BE SIGNIFICANT

### 3.1 Effects Found Not Significant as Part of the DEIR/FEIR Process

#### 3.1.1 Visual Resources

The following analysis of possible visual impacts from the Proposed Project is based on information provided in the *Visual Resources Impact Report for Hoskings Ranch Log. No. 03-10-005*, by TRS Consultants, dated July 2013. The report was authored by Jerelyn Dilno, who is on the County of San Diego's list of individuals approved to prepare visual studies. The report is included as Appendix E to this DEIR/FEIR.

##### 3.1.1.1 *Existing Conditions*

###### Visual Character

###### *Onsite:*

The Proposed Project consists of ~~of~~ rolling terrain vegetated with native habitat that is mostly undisturbed. The property is bounded by State Route 78/79 (SR 78/79) to the north, and the south and west areas of the site encompass ~~corner contains a~~ portion of the Cleveland National Forest (CNF), as shown in Figure 1-5. Approximately 680 acres of the CNF are within the project boundary. Orinoco/Temesca Canyon Creek traverses the site in the south.

###### *Offsite:*

The surrounding area is primarily rural in character, with scattered large lots to the north and east. Pine Hills is a rural residential development to the south. Open land, agriculture, and scattered residential uses are the main feature of lands to the north. The southwest portion of the property is within the Cleveland National Forest, which extends beyond the site to the south and west.

The site is located in the Julian Community Plan Area and is located one mile southwest of the unincorporated town of Julian. The section of SR 78/79 adjacent to the property is designated a second priority scenic highway in the Scenic Highway Element of the San Diego County General Plan. The general location is shown in Figure S-1, "Regional Vicinity Map," and the relation of the Proposed Project to the nearby town of Julian and the surrounding environs is shown in Figure 1-5, "USGS Quadrangle Map."

###### Scenic Resources

The Proposed Project Site consists of a varied terrain. Salient features include a prominent knoll near the northeast corner of the site, surrounded by rolling hills. Moving west, moderate to steep slopes descend from north to south, supporting a plateau of varying width along parts of the northern boundary. Most of the southern boundary consists of steep slopes and supports segments of Orinoco/Temesca Canyon Creek. In the southwest, the steep hillsides turn northwest, leaving a broad relatively flat area that encompasses the entire southwest boundary.

###### Key Views

Figure 3-1-1, "Topographic Viewshed," shows the surrounding areas from which the existing topography affords views onto the Proposed Project Site.

Nine key views were selected for the assessment of any visual impacts the Proposed Project may have. These key views consist of two types: traveling views (for motorists traveling by on SR 78/79), and static views (representing views from stationary locations). Figure 3-1-2, "Key View Index," identifies the perspective of each view. All of the key views were chosen based on their location within the viewshed, and the likelihood that viewing the subject property from the particular vantage point would actually take place. Views were reviewed by the Department of Planning and Development Services for relevance.

#### *Key Views 1, 2, and 3*

See Figure 3-1-3, "Key Views 1 and 2: SR 78/79 Plan and Profile, Looking East," and Figure 3-1-4, "Key View 3: SR 78/79 Looking West" show key Views 1, 2, and 3. Key Views 1 and 2 are taken along SR 78/79 from the point of view of travelers headed east along the roadway, and Key View 3 illustrates the view as travelers approach the site headed west. With the exception of orientation, the analysis of these key views, as seen by the primary viewer group, are similar. The northern border of the site is formed by approximately one mile of SR 78/79.

#### *Key View 4*

Key View 4 (Figure 3-1-5, "Key View 4: Looking North from Pine Hills Residential Area") is located to the south of the property on Eagle Peak Road, with a northern view onto the lots in the east central area of the site. Lots 7 through 9 are called out to the reader, as is the existing off-site building visible in the middle ground, which is approximately one half mile from the viewer. This is a static viewpoint, generally representing possible views from the Pine Hills community. Several home sites exist near this location, the nearest of which is at least one mile from the southern boundary of the Hoskings Ranch property. These homes are well landscaped, with the area between them and the Proposed Project containing a heavy concentration of natural vegetation.

#### *Key View 5*

Key View 5 (Figure 3-1-6, "Key View 5: From Southeast Corner of Project Looking North on Pine Hills Road") is a perspective of Lot 8 taken from the southeast corner of the property at the intersection of Pine Hills Road with Deer Lake Park Road. The view is to the northwest from travelers heading north on Pine Hills Road. The road reaches the top of a grade near this point and the proposed pad is located approximately 0.5 miles from the roadway. The existing natural terrain would not be disturbed and any future pad and building would be partially obscured by the natural landscape. Additionally, the area supports natural vegetation that would screen a potential pad from view. Many trees actually border the roadway, blocking the view westward.

#### *Key View 6*

Key view 6, (Figure 3-1-7, "Key View 6: Looking Northwest from Pine Hills Road") is taken from Pine Hills Road, approximately 600 feet north of the southeast corner of the property. A proposed pad on Lot 7 is approximately 0.3 miles from the roadway. Terrain and vegetation would screen the view of travelers. Additionally, any improvements to the lot would be screened by landscaping consisting of natural vegetation. As the traveler moves north, trees and other vegetation bordering the roadway become denser. The pad would not require any cut or fill slopes.



### *Key View 7 and 8*

Key Views 7 and 8 (Figure 3-1-8, "Key Views 7 and 8: From Pine Hills Road") represent potential views of Lot 5 from Pine Hills Road for travelers headed north (see Key View 7) or south (see Key View 8) along the western boundary of the property. As noted in other views, the vegetation bordering Pine Hills Road is very dense and would effectively screen the view of any incidental structures on Lots 8, 7, and 5 to drivers going north. Key View 8 indicates a break in the natural vegetation along Pine Hills Road. The pad is located approximately 400 feet from Pine Hills Road. A cut slope of two feet would be visible to drivers going south. The fill slope is located on the south side of the pad and would not be visible from Pine Hills Road. The slopes would be revegetated to blend with the natural terrain.

### *Key View 9*

Key View 9 (Figure 3-1-9, "Key View 9: Looking West from Van Duesen Road") is illustrative of the view of residents to the east of the proposed project. Heavy existing vegetation on both sides of Pine Hills Road form a visual barrier. Additionally, the existing homesites to the east of the proposed project have mature landscaping that visually screens their views of the roadway.

### *~~Fire Station Location~~*

~~Figure 3-1-10, "Fire Station Location, Looking West along SR 78/79," provides a photosimulation of the proposed fire station. Landscaping would be in conformance with the County Landscape Ordinance requiring 100 percent screening within two years. Figure 3-1-11, "Fire Station Location, Plan View," demonstrates the location of the building in relationship to the surrounding lots.~~

## Sensitive Viewers

### *Stationary Viewers*

Stationary viewers living in the surrounding areas would have a static view of the property. The intensity of the view would be dependent on the distance from the site, and the denseness and height of the intervening vegetation. The aforementioned Key Views 3 and 4 were chosen to represent views for stationary viewers from the two areas in the vicinity in which existing home sites might have views onto the Proposed Project.

### *Traveling Viewers*

The second group of likely viewers is visitors who are either visiting the local area, or are traveling to or from another of the nearby attractions or the desert beyond the Julian mountain range. The view for these viewer groups would be transitory and would change as the location of the viewer moved through the viewshed. At times the view may be shielded by vegetation or other impediments to the line of sight.

## Regulatory Framework

Visual analysis of the Proposed Project concluded that the Proposed Project would comply with all applicable existing policies and plans, listed as follows. Effects to scenic highways and public viewpoints are evaluated in Section 3.1.1.2:

- San Diego County Historic General Plan – Scenic Highway Element: this plan declares SR-78/79 a Second Priority Scenic Route.

- San Diego County Zoning Ordinance – S – Scenic Area Regulation: this ordinance regulates development in areas of high scenic value both to assure exclusion of incompatible uses and structures and to preserve and enhance the scenic resources present in adjacent areas.
- San Diego County Zoning Ordinance – D-Design Review Area Regulation: this ordinance was adopted to insure that future structures and development of a site would complement not only the site to be developed but also the surrounding areas and existing development
- Julian Community Plan (JCP): this plan calls for the protection of the existing variety of open spaces, the minimization of the removal of natural vegetation, encourages the conservation of natural resources, and protects natural terrain. Resource Protection Ordinance (RPO): this plan calls for the avoidance of steep slopes, floodplains, and the protection of sensitive lands and prehistoric and historic resources, and minimized impacts to wetlands.

Board of Supervisor's Policy I-78 (Hillside Development): the purpose of this policy is to minimize disturbance of natural terrain and provide for created design for hillside developments.

### **3.1.1.2 Analysis of Project Effects and Determination of Significance**

#### Guidelines for the Determination of Significance

The guidelines for aesthetics were derived from Appendix G of the CEQA Guidelines. The Proposed Project would result in significant impacts if it:

1. Would have a substantial adverse effect on a scenic vista.
2. Would substantially degrade the existing visual character or quality of the site and its surroundings.
3. Would the project substantially damage scenic resources, including but not limited to trees, rock outcroppings, and historic buildings within a State scenic highway.

#### Analysis – Scenic Vistas and Visual Character

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

*Guideline 2: Would substantially degrade the existing visual character or quality of the site and its surroundings.*

As stated previously, the nine key views chosen for the analysis of possible visual impacts from the Proposed Project consist of two types: traveling views (for motorists traveling by on SR 78/79), and static views (representing views from stationary locations). See Figure 3-1-2, "Key View Index" for an overview of key view locations. All of the key views were chosen based on their locations within the viewshed, and the concentration of viewers within known inhabited areas in the surroundings.

#### *Key Views 1 and 2*

Drivers approaching the site from the west would have a view approaching the northwest corner of the site as shown in Figure 3-1-3, "Key Views 1 and 2: SR 78/79 Plan and Profile, Looking East". The approximate locations of Lots 1, 2 and 3 are shown in the photo. The building pads of Lots 1 and 3 would be below the line of sight of the traveler. The location of the building pad for Lot 1 is screened by a small

knoll. The profile views in Figure 3-1-3 demonstrates the topography and sight lines from the Highway. The views are both taken from point B<sub>1</sub> on Highway 78/79.

The pad for Lot 2 is designed at grade and is approximately 1,700 feet (0.32 mi.) from SR 78/79. The line of terrain, as shown on the profile line B<sub>1</sub> to B<sub>3</sub>, from the roadway gradually slopes upward to an elevation approximately 60 feet above the roadway. From there the grade gently levels out to the pad location at a proposed grade of 3,986 feet, which is approximately 20 feet below the sight line from the roadway. Any future incidental structure placed on the pad would be 35 feet or less in height. The dashed line at Lot 2 in the profile view demonstrates the low profile of approximately 10 feet that is potentially in view of the observer on SR 78/79. The proposed fill bank is six feet high and well below the line of sight. Any future structure would be in view for approximately 30 seconds at maximum speed. Existing vegetation would remain; thereby, screening any future structure from view. As a result, any structures on the site would not impact the view of passing motorists. Viewer response would be minimal and visual impacts would be below a level of significance.

The pad for Lot 3 is at a proposed elevation of 4,010 feet at a distance of 2,250 feet (0.42 mi) and is approximately 30 feet below the sight line shown along profile line B<sub>1</sub> to B<sub>3</sub> in the profile view. Any incidental structure on the pad would be a maximum of 35 feet in height, leaving approximately five to seven feet in potential view of the highway. The cut and fill slopes for the pad are located on the east and west sides of the pad and are not in the line of sight. The fill slope is approximately 12 feet at its maximum and the cut slope is approximately 10 feet. Existing vegetation would remain; thereby, screening any future structure from view. Viewer response would be minimal and visual impacts would be below a level of significance.

The pad for Lot 1 is designed at an elevation of 3,988, at a distance of 2,100 feet (0.41 mi), requiring only two feet of fill above grade; the profile line of B<sub>1</sub> to B<sub>2</sub> shows the pad to be approximately 40 feet below the sight line as shown on the profile view of Figure 3-1-3. Any future incidental structures on Lot 1 would not be visible to viewers along Hwy 78/79, additionally the site would retain the existing vegetation.

Figure 3-1-4210, "Key Views Photosimulation Looking East on SR 78/79," shows the locations of Lots 1, 2 and 3. The proposed pad elevations are slightly below the line of sight from the roadway.

Any potential development of the site would not be visible from this vantage point. The existing topography and Proposed Project design would minimize visual impact to the viewer to below a level of significance. Guidelines 1 and 2 are not exceeded and impacts are not significant. No mitigation is required.

#### *Key View 3*

Drivers approaching the site from the east would encounter a predominant knoll at the intersection of Pine Hills Road and SR 78/79, which is the northeast corner of the Proposed Project, as shown in Figure 3-1-4, "Key View 3: SR 78/79 Looking West". Along this portion of SR 78/79 the roadway is bordered by natural vegetation that would remain. Any potential development of the site would not be visible from this vantage point. Viewer response to this view would be low to moderate. The existing topography and distance from the road would minimize the visual impact to the viewer to a level below significance. Guidelines 1 and 2 are not exceeded and impacts are not significant. No mitigation is required.

#### *Key View 4*

This view represents the perspective of the residential viewer group to the south of the Proposed Project. See Figure 3-1-5, “Key View 4: Looking North from Pine Hills Residential Area.” The view looks northwesterly into the Proposed Project from the nearest point of the residential viewer group in the development of Pine Hills. Home sites within the area are scattered, with the closest residence being approximately one mile from the area of the site proposed for building pads. The terrain is hilly, dipping into depressions and rising to the flatter areas of the Proposed Project Site.

The locations of Lots 7, 8 and 9 are noted in the panoramic view from Eagle Peak Road in Figure 3-1-~~43~~11, “Key View 4: Photosimulation”.

In the foreground of the view photograph in Figure 3-1-~~43~~11, the top of an existing residence is barely visible. This home site is approximately one-half mile from the viewpoint and labeled. All of the proposed pad locations are at or slightly below grade with respect to the existing topography, and range from 0.8 tenths of a mile to just over a mile distant from the nearest point in Pine Hills. The profile view demonstrates that the pad proposed for Lot 8 is well below the line of sight. The cut slope would be approximately six feet and the fill slope is proposed at four feet in height. The pad is approximately forty feet below the line of sight. At this distance, combined with the existing native vegetation and the pad grading design, any incidental buildings on the Proposed Project Site would be less visible than the existing residence seen in the foreground. No visual impacts are anticipated to this viewer group. Guidelines 1 and 2 are not exceeded and impacts are not significant. No mitigation is required.

#### *Key View 5*

Key View 5 is a perspective of Lot 8 taken from the southeast corner of the property at the intersection of Pine Hills Road with Deer Lake Park Road. Figure 3-1-6, “Key View 5: From Southeast Corner of Project Looking North on Pine Hills Road,” provides a line of sight view and photo of the view. The view is to the northwest from travelers heading north on Pine Hills Road. The road reaches the top of a grade near this point and the proposed pad is located approximately 0.5 miles from the roadway. The existing natural terrain would not be disturbed and any future pad and building would be partially obscured by the existing landscape. Many trees border the roadway, blocking the view westward.

The speed limit is approximately 45 mph on Pine Hills Road. The visual screening of the proposed lot from the roadway begins at approximately 125 feet from the intersection with Deer Lake Road. The proposed pad would be in the potential view of motorist for about four seconds, which would not significantly impact the view.

The inset in Figure 3-1-6 demonstrates the distance the proposed pad from existing residences to the east. The presence of existing vegetation around the established homes screens the view of the pad location. No visual impacts are anticipated to viewer groups. Guidelines 1 and 2 are not exceeded and impacts are less than significant. No mitigation is required.

#### *Key View 6*

Key View 6, as shown on Figure 3-1-7, “Key View 6: Looking Northwest from Pine Hills Road,” is taken from Pine Hills Road, approximately 600 feet north of the southeast corner of the property. A proposed pad on Lot 7 is approximately 0.3 miles



from the roadway. Terrain and vegetation would screen the view of travelers. Additionally, any improvements to the lot would be screened by landscaping consisting of natural vegetation. As the traveler moves north, trees and other vegetation bordering the roadway become denser. The pad would not require any cut or fill slopes. Guidelines 1 and 2 are not exceeded and impacts are not significant. No mitigation is required.

#### *Key Views 7 and 8*

Key Views 7 and 8 are shown on Figure 3-1-8, "Key Views 7 and 8: From Pine Hills Road." They represent potential views of Lot 5 from Pine Hills Road for travelers headed north (see Key View 7) or south (see Key View 8) along the western boundary of the property. As noted in other views, the vegetation bordering Pine Hills Road is very dense and would effectively screen the view of any incidental structures on Lots 8, 7, and 5 to drivers going north. Key View 8 indicates a break in the natural vegetation along Pine Hills Road. A cut slope of two feet would be visible to drivers going south. The fill slope is located on the south side of the pad and would not be visible from Pine Hills Road in direction. The slopes would be revegetated in accordance with the County of San Diego Grading Ordinance and would blend with the natural terrain. The pad is located approximately 400 feet from Pine Hills Road. The residence and surrounding pasture and open land and agriculture would not significantly contrast or conflict with the surrounding area. Guidelines 1 and 2 are not exceeded and impacts are not significant. No mitigation is required.

#### *Key View 9*

This view is from the perspective of the residential viewer group to the east of the Proposed Project. See Figure 3-1-9, "Key View 9: Looking West from Van Duesen Road." The view looks directly west into the Proposed Project from an area of scattered residences. Heavy existing vegetation on both sides of Pine Hills Road form a visual barrier. Additionally, the existing homesites to the east of the proposed project have mature landscaping that visually screens their views of the roadway. This intervening vegetation would therefore reduce any visual impacts to below a level of significance. Guidelines 1 and 2 are not exceeded and impacts are not significant. No mitigation is required.

#### Analysis –Scenic Resources

*Guideline 3: Would the project substantially damage scenic resources, including but not limited to trees, rock outcroppings, and historic buildings within a State scenic highway.*

The Proposed Project proposes a subdivision along a State scenic highway SR 78/79. Although the project site can be seen from the State scenic highway, the project would not substantially damage scenic resources. The project proposes large lots, residential pads located away from the roadway, and would be generally screened by existing vegetation and topography. Grading has been designed to minimize landform alteration. New roads follow existing roads where possible and pads would be generally placed on the flatter portions of the site.

Key features noted earlier in the analysis, specifically the prominent knoll in the northeast part of the site and Orinoco/Temescal Canyon Creeks in the south, would be preserved in open space by the Proposed Project's design. Further, the project would not remove any significant trees from the Proposed Project Site, nor would it damage any historic buildings; therefore, no impacts to scenic resources are

anticipated. Guideline 3 is not exceeded and impacts are not significant. No mitigation would be necessary.

### **3.1.1.3 Cumulative Impact Analysis**

The cumulative boundaries selected for Hoskings Ranch are the limits of the viewshed. Figure 3-1-~~14~~<sup>12</sup>, "Cumulative Projects Map," shows the location of past, present and reasonably anticipated projects in the area that have been determined to have a visual impact. The listed projects are:

1. MUP 06-016 – cell tower
2. MUP 92-005 – cell tower
3. MUP 00-044 – cell tower
4. TM 4489 – 41 lot subdivision

Of the projects listed, only MUP 06-016 is within the cumulative boundary of the Proposed Project.

The visual impacts of the Proposed Project and MUP 06-016 are less than significant and therefore their cumulative effect is anticipated to be of a similarly low significance. The effects of a large lot agricultural project are not cumulative to that of a cell tower. They present very different visual effects. Additionally, MUP 06-016 and the Proposed Project are generally not visible at the same time. From SR 78/79, MUP 06-016 comes into view either before or after the Proposed Project Site is in view. When viewed from Pine Hills community, a home approximately a mile away is readily visible. The cell tower, as shown in Figure 3-1-5, is approximately two miles beyond the home would not be visible. Therefore, cumulative projects would not seen simultaneously and cumulative impacts are not significant, no mitigation is required.

### **3.1.1.4 Significance of Impacts Prior to Mitigation**

There are no significant visual impacts from the Proposed Project.

### **3.1.1.5 Conclusions**

A visual analysis was prepared by a County-listed consultant. Viewsheds and key views from the surrounding community were evaluated to determine any visual impacts that might result from the Proposed Project. The Proposed Project would not significantly alter key views in the area because of the low density proposed, distance of pads from the scenic highway, retention of a majority of the existing vegetation. The Proposed Project would not significantly alter the natural topography. Changes include minimal grading and the potential agricultural development of the lots. Cumulative impacts are not significant because cumulative projects are not simultaneously visible. In conclusion, the Proposed Project does not have any significant adverse effects on the visual resources of the area. No mitigation is required.

## **3.1.2 Agricultural Resources**

Agricultural analysis for the TM 5312RPL<sup>3</sup> Hoskings Ranch project was conducted by TRS Consultants and is entitled *Agricultural Conversion Analysis for Hoskings Ranch TM5312RPL<sup>3</sup>*, ER# 03-10-005, and dated ~~June~~<sup>August</sup> 2013 (provided herein as Appendix F).

### **3.1.2.1 Existing Conditions**

The site is characterized by undeveloped rolling hills that have been used for cattle grazing in the past, but there is no indication of agricultural uses such as tilling and plowing. An area of approximately 680 acres in the southern portion of the site is a private inholding, within the Cleveland National Forest. Portions of the site are under Williamson Act contract, limiting lot sizes to a minimum of 40 acres. There are no residences on the site and the only structures present are capped wells, four man-made detention basins, fences, and a cattle loading corral.

#### **Farmland Mapping and Monitoring Program**

The site is mapped under the Farmland Mapping & Monitoring Program (FMMP) as Other Land, which is land that does not meet the criteria of any other category. A relatively small area of Grazing Land is located along SR 78/79 in the northeastern portion of the site. See Figure 3-2-1, "Site on Farmland Mapping and Monitoring Program Map," and Figure 3-2-2, "Farmland Mapping and Monitoring Program Map Legend."

Three FMMP Prime Soils or Soils of Statewide Importance are found on the site: Holland fine sandy loam (HmD); Loamy alluvial land (Lu); and Reiff fine sandy loam (RkC), as detailed in Appendix F, Section 1.4.2.1. The Lu soil (if drained) meets the criteria for Prime Farmland. HmD and RkC soils meet the criteria for Farmland of Statewide Importance, which is similar to the Prime Farmland criteria, but with minor shortcomings, such as greater slopes or less ability to store moisture. The FMMP Farmland soils are based on local soil characteristics and irrigation status, with the best quality land identified as Prime Farmland and Farmland of Statewide Importance. The State Department of Conservation (DOC) publishes a list of soils that meet the soil quality criteria for Prime Farmland soils and Soils of Statewide Importance. Soil criteria are defined by the Natural Resources Conservation Service (NRCS) and are unique to each county. In San Diego County, 44 local soils qualify for the Prime Farmland designation and 65 soils qualify for the Farmland of Statewide Importance designation. These soil criteria include a much broader range of soils than the FMMP Farmland designations mentioned above, and are detailed in Section 2.2.2 of Appendix F. Attachment B of Appendix F details soil candidate criteria and candidate listings for Prime Farmland and Farmland of Statewide Importance in San Diego County.

#### **Williamson Act Contracts and Agricultural Preserves**

Approximately 1,291.5 acres of the Proposed Project Site are under a Williamson Act Contract within Agricultural Preserve Number 28, dated February 19, 1974. The contract was amended (Amendment 2) on March 24, 1982 to reduce the minimum lot size from 160 to 40 acres. Approximately 161.23 acres in the southeast part of the site were not covered by this amendment. The Proposed Project includes a proposal to amend the Williamson Act contract to reduce the minimum lot size in this area from 160 to 40 acres. Amendment 1 regarding 15-acre minimum lot size applied to areas north of the current Proposed Project Site and is not a part of the Proposed Project.

#### **Zoning and General Plan Designation**

The Proposed Project Site is in the Environmentally Constrained Areas (ECA) regional category in the Land Use Element of the Historic General Plan (HGP) because the site is within an agricultural preserve and part of the site is within the

Cleveland National Forest. The Proposed Project Site is designated (19) Intensive Agricultural in the GP, which allows one dwelling unit per 2, 4, or 8 acres, depending on the criteria identified by the GP. Approximately 680 acres of the site is within the Cleveland National Forest. The Proposed Project Site is zoned A72 (8), an agricultural designation which allows one dwelling unit per eight acres. The zone is intended to allow for the compatibility of residential and agricultural land uses. The Project proposes uses that are consistent with the existing category, designations, and zoning.

#### On-Site Agricultural Production

The site is undeveloped and currently supports cattle grazing, throughout much of the site, and provides no indications of other agricultural uses such as tilling, plowing, or other disturbance of soils. The site is characterized by undeveloped rolling hills that have been used for cattle grazing in the past.

#### Surrounding Agricultural Resources

Agricultural land uses exist adjacent to the Proposed Project Site on the east and north. The Cleveland National Forest is south and west of the Proposed Project Site and has scattered residential and agricultural uses. The majority of surrounding land use is Protected Resource Land, which includes Williamson Act Contract lands; publicly owned lands maintained as park, forest, or watershed resources; and lands with agricultural, wildlife habitat, open space, or other natural resource easements. Protected Resource Lands restrict the conversion of such land to urban or industrial uses.

An orchard is located adjacent to the Proposed Project along the southern boundary to the east. Williamson Act Contract lands are located north of the site and consist mostly of grazing land and cattle breeding operations. Apple orchards also occur within a quarter mile north of the site.

#### Regulatory Framework

Preparation of the agricultural report was guided by the *County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements, Agriculture*. Additionally, the following regulations, policies, and programs are relevant:

##### *California Environmental Quality Act*

Under CEQA, lead agencies are required to consider a proposed project's impacts to agricultural resources. The CEQA Guidelines recommend focusing on analyzing impacts to: Farmland as defined by the Farmland Mapping and Monitoring Program developed by the California Department of Conservation; Williamson Act contracts; agricultural zoning; and agricultural conversion. The California LESA Model was developed to provide lead agencies with an optional methodology to ensure that potentially significant effects on the environment of agricultural land conversions are quantitatively and consistently considered in the environmental review process. San Diego County uses and alternate methodology, the Local Agricultural Resource Assessment (LARA), to achieve this result.

##### *Land Conservation (Williamson) Act*

Known formally as the California Land Conservation Act of 1965, the Williamson Act was designed as an incentive to retain prime agricultural land and open space in agricultural use, thereby slowing its conversion to urban and suburban development.



The program entails a ten-year contract between the City or County and an owner of land whereby the land is taxed on the basis of its agricultural use rather than the market value. The land becomes subject to certain enforceable restrictions, and certain conditions need to be met prior to approval of an agreement.

*The Right to Farm Act*

This act is designed to protect commercial agricultural operations from nuisance complaints that may arise when the operation is conducting business in a "manner consistent with proper and accepted customs." The code specifies established operations that have been in business for three or more years that were not nuisances at the time they began, shall not be considered a nuisance as a result of a new land use.

*Farmland Mapping and Monitoring Program (FMMP)*

California Department of Conservation (DOC) FMMP produces maps and statistical data used for analyzing impacts on California's agricultural resources. Agricultural land is rated according to soil quality and irrigation status; the best quality land is called Prime Farmland.

Local Regulations, Policies, Standards, and Programs

*San Diego County General Plan*

The County's General Plan provides guidance for the protection, promotion and preservation of agriculture in San Diego County. Aspects of agriculture are discussed in the General Plan's Open Space Element, Land Use Element, Conservation Element, and Community Plans.

*San Diego County Agricultural Enterprises and Consumer Information Ordinance*

The ordinance defines and limits the circumstances under which agricultural enterprise activities, operations, and facilities would constitute a nuisance. The ordinance recognizes that the commercial agricultural industry in the County of San Diego is a significant element of the County's economy and a valuable open space/greenbelt resource for San Diego County residents.

*San Diego County Board of Supervisors Policy I-38 Agricultural Preserves*

The Board of Supervisor Policy I-38 sets forth policies for the implementation of the California Land Conservation Act of 1965, known as the Williamson Act. In 1965 the State Legislature added to the Government Code Sections 51200 et. seq. which authorized the County to establish agricultural preserves. An agricultural preserve is an area devoted to agricultural use, open space use, recreational use, or any combination of such uses, and compatible uses which are designated by the County. Preserves are established for the purpose of defining the boundaries of those areas within which the County would be willing to enter into contracts pursuant to the Act. Landowners within a preserve may enter into a Contract with the County to restrict their land to the uses stated above whereby the assessment on their land would be based on its restricted use rather than on its market value.

*San Diego County Farming Program*

The goals of the San Diego County Farming Program are to promote economically viable farming in San Diego County and to create land use policies and programs that recognize the value of working farms to regional conservation efforts.

*San Diego County Board of Supervisor's Policy I-133 Support and Encouragement of Farming in San Diego County*

In 2005, the Board of Supervisors adopted a policy to establish the County's support of agriculture. The policy established the Board's commitment, support, and encouragement of farming in San Diego County through establishment of partnerships with landowners and other stakeholders to identify, secure, and implement incentives that support the continuation of farming as a major industry in San Diego. The intent is to develop and implement programs designed to support and encourage farming in San Diego County.

**3.1.2.2 Analysis of Project Effects and Determination as to Significance**

Guidelines for the Determination of Significance

Guidelines are from the County of San Diego *Guidelines for Determining Significance and Report Format and Content Requirements – Agricultural Resources* (March 19, 2007) and are the basis for evaluating impacts to important onsite agricultural resources in San Diego County. An affirmative response to, or confirmation of the following guidelines would generally be considered a significant impact to agricultural resources as a result of Proposed Project implementation, in the absence of evidence to the contrary:

1. The project site has important agricultural resources as defined by the LARA Model; and the project would result in the conversion of agricultural resources that meet the soil quality criteria for Prime Farmland or Farmland of Statewide Importance, as defined by the FMMP; and as a result, the project would substantially impair the ongoing viability of agricultural use on the site.
2. Proposes a non-agricultural land use within one-quarter mile of an active agricultural operation or land under a Williamson Act contract and as a result of the project, land use conflicts between agricultural operations or Williamson Act contract land and the project are likely to occur and could result in conversion of agricultural resources to non-agricultural use.
3. Propose a school, church, daycare or other use that involves a concentration of people at certain times within one mile of an agricultural operation or land under Williamson Act contract and as a result of the project, land use conflicts between agricultural operations or Williamson Act contract land and the project are likely to occur and could result in conversion of agricultural resources to non-agricultural use.
4. Involves other changes to the existing environment, which due to their location or nature, could result in the conversion of off-site agricultural resources to non-agricultural use or could adversely impact the viability on land under a Williamson Act contract.
5. The project conflicts with a Williamson Act contract or the provisions of the California Land Conservation Act of 1965 (Williamson Act).

Analysis

*Guideline 1: The project site has important agricultural resources as defined by the LARA Model; and the project would result in the conversion of agricultural resources that meet the soil quality criteria for Prime Farmland or Farmland of Statewide*

*Importance, as defined by the FMMP; and as a result, the project would substantially impair the ongoing viability of agricultural use on the site.*

The LARA Model determined that the site is not an important agricultural resource because a required factor, water, is rated as having low importance. Two other required factors, climate and soil quality, are rated as moderate importance. Land use consistency and slope are both rated low importance, while surrounding land uses is rated high importance because more than 90 percent of land within the Zone of Influence (ZOI) is compatible with agriculture. Guideline 1 is not exceeded, impacts are less than significant and no mitigation is required.

*Guideline 2: Proposes a non-agricultural land use within one-quarter mile of an active agricultural operation or land under a Williamson Act contract and as a result of the project, land use conflicts between agricultural operations or Williamson Act contract land and the project are likely to occur and could result in conversion of agricultural resources to non-agricultural use.*

The Proposed Project Site is under a Williamson Act Contract and currently supports an agricultural use, which may continue after the subdivision of land. Individual lot owners may opt out of the Williamson Act Contract, in which case there is a ten year period during which agriculture may continue. There are agricultural operations north of the site.

Design features identified for the Proposed Project would preclude impacts to adjacent agricultural operations. These include:

- Continuation of existing agriculture on the Proposed Project Site. Most of the proposed residential lots are adjacent to areas that currently have an agricultural use, or are undeveloped. Conflicts with those areas where there is an adjacent agricultural use would be minimized due to the similarity of use and commonly shared issues between onsite and offsite operations (e.g., cattle grazing currently is carried out east, north, and southwest of the site).
- A Conceptual Grazing Management Plan (CGMP) has been prepared that provides scientifically-based management of habitats as related to grazing. All grazing activities would be subject to monitoring and reporting, as well as remedial action if and when needed, and would be coordinated with the Resource Management Plan (RMP).
- The CGMP is provided as Appendix B to this ~~DEIR~~FEIR. Proposing large lots ranging in size from 40 to 196 acres. This design provides flexibility in the siting of residences. As a result, residential pads are generally located away from project boundary areas. This separation minimizes the potential for effects such as odor and noise from offsite areas. Lot 5 on the east is the closest to an offsite area, with an approximate 500-foot separation between the pad and the adjacent lot across Pine Hills Road. According to the *Guideline for Determining Significance and Report Format and Content Requirements* (page 42), a 300-foot or grade separation is generally regarded as adequate to reduce interface conflicts to below a level of significance. Additionally, cattle grazing exists on the site.
- Monitoring and control of the use of pesticides via pesticide permitting through the County of San Diego Department of Agriculture, Weights and Measures (AWM). A permit allows AWM to require limitations such as implementing buffer zones around the application, prohibiting applications by

air, or limiting the amount of acreage treated at any one time. The Proposed Project would conform to AWM's requirements.

- Minimization of odor impacts through the Project's large lot design, which separates on- and off-site uses. Grazing density on the site would be low density of approximately 680 head of cattle, or an average of one cow per 17.7 acres.
- Several Williamson Act contract lands are located in the vicinity. Grazing onsite is similar to the low-intensity grazing and pasture uses in these areas.

Therefore, the Proposed Project would not result in any land use conflicts between agricultural operations or off-site Williamson Act contract lands. Further, the project would not result in the conversion of off-site agricultural resources to non-agricultural uses. Therefore, Guideline 2 is not exceeded, impacts are less than significant and no mitigation is required.

*Guideline 3: Propose a school, church, daycare or other use that involves a concentration of people at certain times within one mile of an agricultural operation or land under Williamson Act contract and as a result of the project, land use conflicts between agricultural operations or Williamson Act contract land and the project are likely to occur and could result in conversion of agricultural resources to non-agricultural use.*

The Proposed Project does not propose a school, church, daycare or other use that involves a concentration of people at certain times, within one mile of an agricultural operation or land under Williamson Act contract. The Proposed Project is a tentative map for a residential subdivision. Therefore, Guideline 3 is not exceeded and no impact is identified for this issue area. No mitigation is required.

*Guideline 4: Involves other changes to the existing environment, which due to their location or nature, could result in the conversion of off-site agricultural resources to non-agricultural use or could adversely impact the viability on land under a Williamson Act contract.*

The project does not propose other changes that would result in the conversion of agricultural uses surrounding the site. The project supports existing and continued agricultural operations onsite. Offsite uses are protected through project design features that preserve agriculture, maintain a low density of 40 acres per lot, and separate residential uses from offsite uses. Therefore, Guideline 4 is not exceeded and no impact is identified for this issue area. No mitigation is required.

*Guideline 5: The project conflicts with a Williamson Act contract or the provisions of the California Land Conservation Act of 1965 (Williamson Act).*

The Williamson Act contract restricts residential use on contract land unless that use is incidental to an agricultural use. The contract stays with the land and as such the Proposed Project would require an agricultural component on each lot. If any lot owner wishes to stop all agricultural activity, a notice to terminate the Williamson Act contract for that property must be filed and would take ten years to entirely extinguish (see also Williamson Act discussion in section S.3 and section 1.2.1).

The Proposed Project provides for continuation of existing agriculture on each subdivided lot, in conformance with Board Policy I-38.



Therefore, Guideline 5 is not exceeded and impacts are less than significant. No mitigation is required.

### 3.1.2.3 Cumulative Impact Analysis

The County of San Diego's *Guidelines for Determining Significance and Report Format and Content Requirements* (March 19, 2007) were used to determine the scope of the cumulative analysis.

The cumulative study area includes the surrounding west-facing mountainous areas of Julian and Santa Ysabel, as well as the flatter valleys to the northwest. The area shares a common climate, topography and location within the Julian Community Planning Area. The cumulative study area is also based on the *Guidelines'* Attachment F *Defining a Project's Zone of Influence*. Agricultural factors such as other lands in contract, important farmland and important soils were taken into account in determining the cumulative study area. Grazing is a common form of agriculture in the area. The *Guidelines* require the analysis of all properties within a quarter-mile of the subject property.

The cumulative study projects are shown in Figure 3-2-3, "Cumulative Projects on Farmland Mapping and Monitoring Program Map," designated by red dots, and are listed in Table 3-2-1, "Cumulative Project List."

The entire cumulative study area contains 90 projects. Of these 90, 55 projects were not analyzed because the County of San Diego had determined that they would not substantially impair the ongoing viability of agricultural use. The remaining 35 projects were examined in detail. Of the remaining 35 projects, it was concluded that 27 do not convert land to non-agricultural uses or have any agricultural impacts. These are listed in the agricultural resources study (Appendix F, Table 3).

The remaining eight projects in the cumulative projects study area either have existing agriculture onsite or have Prime or Statewide Importance soils. Some of these projects were applications to expand existing agricultural operations, some mitigated impacts onsite through preservation in open space, and some projects did not have agricultural impacts.

The cumulative impacts within the study area result from the following:

- Proposed Project has a direct impact to 16 acres of important soils;
- Julian Sanitation District project (MUP 77-113) results in an impact to two acres of Farmland of Statewide Importance;
- Ortega project (TPM 19932) results in an impact of three acres;
- YMCA project (MUP 75-083 ) impacts four acres;
- Julian/Cuyamaca Fire Station would impact two acres of Farmland of Statewide Importance.

Collectively, the Proposed Project in combination with other anticipated development in the area results in the total loss of 27 acres of Prime Farmland or Farmland of Statewide Importance within the 22,400-acre study area. Despite isolated losses of agricultural farmland, the agricultural industry in San Diego continues to expand. For example, between 2005 and 2010, the total value of agricultural production increase by eight percent, from 1.53 billion in 2005 to 1.65 billion in 2010. The number of acres in agricultural production increased 11 percent during that same time, from

273,176 acres in 2005 to 302,713 in 2010. Therefore, the cumulative loss of 27 ~~25~~ acres of Prime Farmland and Farmland of Statewide Importance is considered less than significant, because the area of farmland in the County continues to expand, despite isolated losses. No mitigation is required.

There are several cumulative projects in the vicinity that support Williamson Act Contracts (see Appendix E of the Agricultural Conversion Report). The Proposed Project would continue under a Williamson Act Contract and current cattle grazing/cattle breeding activities would also continue. Due to the similarity of agricultural uses, the Project would have minimal effect on surrounding properties under a Williamson Act Contract.

Any change from agricultural uses would have to comply with the provisions of the Williamson Act and County Board of Supervisors Policy I-38, which implements the Williamson Act. To the extent that all projects must comply with state law as regards the Williamson Act, cumulative impacts related to the Williamson Act are precluded. Impacts are not significant and no mitigation is required.

#### **3.1.2.4 Significance of Impacts Prior to Mitigation**

There are no significant impacts anticipated to agricultural resources as a result of the Proposed Project.

#### **3.1.2.5 Conclusion**

The Proposed Project does not result in a significant impact to agricultural resources onsite. Offsite agricultural resources were assessed using aerial photographs and information gathered during site visits. The Proposed Project would not significantly impact nearby offsite agricultural uses because it would continue agricultural uses that are similar to those already established in the area. Controls on pesticide use would be in accordance with State law and County ordinance. Williamson Act contracts are not threatened because sites under contract must conform to State law and County processes, in order to change contract status. Offsite impacts to these contract lands are minimized as a result of the Project's large-lot design which separates uses by large distances, as well as consistency of use with nearby uses, and controls on activity. The Proposed Project would not produce a concentration of people because it does not propose a use such as a church or school. Furthermore, the project does not propose other changes to the existing environment which could result in the conversion of offsite agricultural resources to a non-agricultural use. Based upon the list of past, present and reasonably future project, cumulative impacts are not significant because agricultural impacts are avoided, and because the capacity for agricultural uses would be maintained. In conclusion, impacts to agricultural resources would be less than significant and no mitigation is required.

### **3.1.3 Air Quality/Global Climate Change**

Air quality and climate change studies were prepared for the Proposed Project by Urban Crossroads, entitled, respectively, *Air Quality Study, Hoskings Ranch TM5312, Log No. 03-10-005*, October 31, 2011, and *Global Climate Change Analysis, Hoskings Ranch (TM 5312 RPL2, Log No. 03-10-005)*, dated April 10, 2012~~October 922, 2015~~. The air quality report was ~~reports were~~ prepared by Haseeb Qureshi, and the global climate change report was prepared by Jeremy Loudon. They are ~~who is~~ on the County's list of consultants approved to prepare air quality and global climate change analyses. The reports are included as Appendices H and I, respectively. The following section

combines these two separate studies to provide a comprehensive view of existing and projected air quality and climate change conditions surrounding the Hoskings Ranch property.

### **3.1.3.1 Existing Conditions**

#### **Air Quality – Introduction**

The Proposed Project is located within the San Diego Air Basin (SDAB), whose climate is dominated by a semi-permanent high pressure cell or region in which air pressure is higher than surrounding areas. This cell influences the direction of prevailing winds (westerly to northwesterly) and maintains clear skies for much of the year. The high pressure cell also creates two types of temperature inversions that may act to degrade local air quality. Temperature inversions are situations in which warmer air is trapped closer to the earth under a layer of cooler air, and is associated with global warming effects.

Subsidence inversions occur during the warmer months as descending air associated with the Pacific high pressure cell comes into contact with cool marine air. The boundary between the two layers of air creates a temperature inversion that traps pollutants. The other type of inversion, a radiation inversion, develops on winter nights when air near the ground cools by heat radiation and air aloft remains warm. The shallow inversion layer formed between these two air masses can trap pollutants. As the pollutants become more concentrated in the atmosphere, photochemical reactions occur that produce ozone, commonly known as smog.

The climate of the coastal southern California, including the County of San Diego, is determined largely by high pressure that is almost always present off the west coast of North America. High pressure systems are characterized by an upper layer of dry air that warms as it descends. This warm, dry air acts as a lid, restricting cool air located near the surface, creating an inversion of typical temperature conditions.

During the summer and fall, emissions generated in the region combine with abundant sunshine under the influences of topography and the aforementioned inversion to create conditions that are conducive to the formation of photochemical pollutants, such as ozone, and secondary particulates, such as sulfates and nitrates. As a result, air quality in the SDAB is often the poorest during the warmer summer and fall months.

Average summer high temperatures in the Proposed Project vicinity (Julian) are approximately 84 degrees Fahrenheit (°F). Average winter low temperatures are approximately 37°F. The average rainfall in the Proposed Project vicinity is approximately 24 inches annually.

The distinctive climate of the Proposed Project area and the SDAB is determined by its terrain and geographical location. The Basin is located in a coastal plain with connecting broad valleys and low hills, bounded by the Pacific Ocean in the southwest quadrant with high mountains forming the remainder of the perimeter.

The prevailing winds in the Proposed Project area move predominately from northwest to southeast with an average wind speed of 2.33 meters per second (m/s). Meteorological data from the San Diego air monitoring station (Miramar MCAS) was used to represent conditions at the Proposed Project area's inland location. It should be noted that although the Miramar monitoring station is located approximately 31

miles southwest of the Proposed Project Site, its inland location provides the best available data representative of conditions at the Proposed Project Site.

#### Air Quality – Regulatory Framework

The following agencies are involved in air quality regulations:

- The U.S. Environmental Protection Agency (EPA) is responsible for setting and enforcing the National Ambient Air Quality Standards (NAAQS) for oxidants (O<sub>3</sub>), carbon monoxide (CO), nitrogen oxide (NO<sub>x</sub>), sulfur dioxide (SO<sub>2</sub>), particulate matter (PM<sub>10</sub>), fine particulate matter (PM<sub>2.5</sub>), and lead.
- The Federal Clean Air Act (CAA) establishes the federal air quality standards, the NAAQS, and specifies future timelines for compliance.
- The California Air Resources Board (CARB), which became part of the EPA in 1991, is responsible for ensuring implementation of the California Clean Air Act (AB2595).
- Local air quality management districts, such as the San Diego Air Pollution Control District (SDAPCD), regulate air emissions.
- The SDAPCD along with the San Diego Association of Governments (SANDAG) are responsible for developing and implementing the clean air plan for attainment and maintenance of the ambient air quality standards in the SDAB. The San Diego County Regional Air Quality Strategy (RAQS) was initially adopted in 1991, and outlines the APCD's plans and control measures designed to attain the state air quality standard for ozone (O<sub>3</sub>).

#### Existing Air Quality/Attainment Status

Existing air quality is measured based upon ambient air quality standards. These standards are the levels of air quality that are considered safe, with an adequate margin of safety, to protect public health and welfare.

The determination of whether a region's air quality is healthful or unhealthful is determined by comparing contaminant levels in ambient air samples to the state standards and federal standards. The air quality in a region is considered to be in attainment if:

1. The measured ambient air pollutant levels for O<sub>3</sub>, CO, SO<sub>2</sub> (1-hour and 24-hour), NO<sub>2</sub>, and PM<sub>10</sub> are not exceeded and all other standards are not equaled or exceeded at any time in any consecutive three-year period.
2. And the federal standards (other than O<sub>3</sub>, PM<sub>10</sub>, and those based on annual averages or arithmetic mean) are not exceeded more than once per year.

The SDAPCD operates a network of ambient air monitoring stations throughout San Diego County. The purpose of the monitoring stations is to measure ambient concentrations of the pollutants and determine whether the ambient air quality meets the CAAQS and NAAQS.

Air quality has shown improvement in the SDAB such that there have been no violations of standards for CO, NO<sub>x</sub>, Inhalable Particulates (PM<sub>10</sub>), and Ultra-Fine Particulates (PM<sub>2.5</sub>) over the past five years in the Proposed Project area, and very low occurrences of violations for PM<sub>10</sub> and O<sub>3</sub>.



The nearest long-term air quality monitoring station to the Proposed Project for O<sub>3</sub>, CO, NO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> is carried out at the El Cajon monitoring station located approximately 26 miles southwest of the Proposed Project Site. Data for Carbon Monoxide (CO) was obtained from the Chula Vista monitoring station located approximately 39 miles southwest of the Proposed Project Site.

#### Global Climate Change – Introduction

Greenhouse gases such as water vapor and carbon dioxide are abundant in the earth's atmosphere. These gases are called "Greenhouse Gases" because they absorb and emit thermal infrared radiation which acts like an insulator to the planet. Without these gases, the earth's ambient temperature would either be extremely hot during the day or very cold at night. However, because these gases can both absorb and emit heat, the earth's temperature does not reach these extremes.

Over the years human activities have employed the burning of fossil fuels stored as carbon, thus releasing into the air as carbon dioxide (CO<sub>2</sub>) and to a much lesser extent carbon monoxide (CO). Scientists have measured this rise in CO<sub>2</sub> and have correlated it with a warming of the atmosphere. Thus the levels of greenhouse gases emitted by human activity generally, and by land use activities specifically, have become an environmental concern.

Greenhouse gases of concern as analyzed in the technical report for this subject (Appendix I) are CO<sub>2</sub>, Methane (CH<sub>4</sub>), and Nitrous Oxide (N<sub>2</sub>O). To simplify greenhouse gas calculations, both CH<sub>4</sub> and N<sub>2</sub>O can be converted to an equivalent amount of CO<sub>2</sub> or CO<sub>2</sub>e. This allows use of a single measurement to assess the global warming effect of these three gases. Global Climate Change (GCC) is defined as the change in average meteorological conditions on the Earth with respect to temperature, precipitation, and storms.

Global temperatures are regulated by naturally occurring atmospheric gases such as water vapor, CO<sub>2</sub> (Carbon Dioxide), N<sub>2</sub>O (Nitrous Oxide) and CH<sub>4</sub> (Methane). These gases allow solar radiation to enter the Earth's atmosphere, but prevent radioactive heat from escaping, thus warming the Earth's atmosphere. GCC can occur naturally as it has in the previous ice ages. However, according to the California Air Resources Board (CARB), the climate change that is currently in effect differs from previous climate changes in both rate and magnitude (CARB, 2004, Technical Support document for Staff Proposal Regarding Reduction of Greenhouse Gas Emissions from Motor Vehicles). Gases that trap heat in the atmosphere are often referred to as Green House Gases (GHG). GHG are released into the atmosphere by both natural and anthropogenic (human) activity.

#### Global Climate Change – Regulatory Framework

The Global Warming Solutions Act of 2006, better known as Assembly Bill 32 (AB 32), requires that by 2020 the state's greenhouse gas emissions be reduced to 1990 levels. AB 32 is specific as to when significance thresholds for greenhouse gas emissions need to be adopted. A timeline for the adoption of thresholds is included in Part 4 of AB 32, titled *Greenhouse Gas Emissions Reductions*.

AB 341 makes a legislative declaration that it is the policy of the state that not less than 75 percent of solid waste generated by source reduced, recycled, or composted by the year 2020. It required the state Department of Resources Recycling and Recovery (DOR) to provide a report to the legislature by January 1, 2014 that provides strategies to achieve that policy goal. This bill increases diversion

requirements by an additional 25 percent over Business as Usual as was defined under AB 939 and Senate Bill 1322 (SB 1322).

SB 97 requires the state Office of Planning and Research to prepare and transmit to the DOR guidelines and directed amendments to the CEQA statute specifically for the mitigation of greenhouse gas emissions on the effects of greenhouse gas emissions.

The Energy Independence and Security Act of 2007 (EISA) is a federal energy policy law adopted by Congress that is designed to increase energy efficiency and the availability of renewable energy. The law will require automakers to boost fleet-wide gas mileage averages from the current 25 mpg to 35 mpg by 2020. This fleet-wide average is known as the Corporate Average Fuel Economy (CAFE) standard.

AB 1493 is a state law that is similar to CAFE standards but is expected to produce a GHG benefit that is greater than CAFE. The California standards, also referred to as the Pavley rules, are designed to regulate GHG emissions while the EISA is aimed at reducing the nation's fuel consumption.

California's Advanced Clean Car Program incorporates higher emission standards, known as Pavley II, with a program to encourage development of zero emission vehicles. This program is expected to reduce GHGs by 4.0 million metric tons or roughly 2.4 percent beyond Pavley I.

The California vehicle efficiency effort is also augmented by the Low Friction Oil, Tire Pressure Regulation, Tire Tread Program, and Solar Reflective Automotive Paint and window glazing efforts. To date only the Tire Pressure Regulations have been implemented.

The Governor's Executive Order S-01-07, also known as the Low Carbon Fuel Standard (LCFS), was enacted in January 2007 and seeks to reduce the carbon intensity of California's passenger vehicle fuels by at least 10 percent by 2020.

The Governor's Executive Order S-3-05 was signed in June 2005 and set the following greenhouse gas targets for California: by 2010, reduce GHG emissions to 2000 levels; by 2020, reduce GHG emissions to 1990 levels, and by 2050, reduce GHG emissions to 80 percent below 1990 levels.

The Governor's Executive Order B-30-15 was signed in April 2015. This order seeks to establish a California greenhouse gas reduction target of 40 percent below 1990 levels by 2030.

The Governor's Executive Order S-14-08, also known as the Renewable Portfolio Standard (RPS), requires that the retail sellers of electricity will serve 33 percent of their load with renewable energy by 2020. Though this is not a law, for the purposes of speculative GHG forecasting into 2030 and 2050, it is reasonable to assume that it will be a requirement.

The California Energy Code, or Title 24, Part 6 of the California Code of Regulations, were established in 1978 in response to a legislative mandate to reduce the state's energy consumption. The code was updated in 2008 to reduce both natural gas and electrical energy demand. Title 24 (2008) has been found to reduce electrical emissions by 22.7 percent when compared to buildings constructed with 2005 minimum standards. Title 24 (2010) incorporated a voluntary program of efficiency standards. Title 24 (2013) made extensive revisions to the energy efficiency standards for new construction, seeking a reduction of electricity use by 36.4 percent

for single family homes and 22 percent for non-residential buildings. Natural gas reductions being sought are 6.5 percent and 17 percent, respectively.

Several governmental agencies are now working towards policies and standards that will work at the federal, state, and local levels. The CARB, California Environmental Protection Agency (Cal EPA), the U.S. Environmental Protection Agency (EPA), the South Coast Air Quality Management District (SCAQMD) or other appropriate governmental organizations have not yet developed formal guidelines for California Environmental Quality Act (CEQA) assessments for climate change, though a number of these groups is currently in the process of developing guidelines for the determination of significance for climate change. In the absence of published CEQA thresholds, analysis of GCC for the Proposed Project includes CEQA-level discussions that suggest such guidelines and evaluates the potential impact of the Proposed Project with regard to its contribution to GHG based on the intent of AB32.

Title 24 Energy Standards: Title 24 of the California Code of Regulations was enacted in 1978, and requires buildings to meet energy efficiency standards. It is estimated by the CEC that consumers have saved \$15.8 billion on utility bills since 1978 as a result of Title 24, indirectly resulting in a reduction in GHG emissions that would otherwise result from increased energy use. Title 24 standards are updated periodically to allow for the consideration and implementation of new energy efficient technologies.

California Assembly Bill No. 1493 (AB 1493): Vehicle emissions of GHG were subsequently targeted in 2002 with the passage of AB 1493, which required CARB to develop regulations to limit GHG emissions by cars and light duty trucks. These measures will go into effect in 2009, and it is estimated that vehicle emissions of GHG will be reduced by approximately 18 percent by 2020 (CARB 2004).

Executive Order S-3-05: On June 1, 2005, California Governor Arnold Schwarzenegger mandated GHG emission reduction targets as follows:

1. By 2010: reduce GHG emissions to 2000 levels
2. By 2020: reduce GHG emissions to 1990 levels
3. By 2050: reduce GHG emissions to 80 percent below 1990 levels

California Senate Bill No. 1368 (SB 1368): In 2006, the State Legislature adopted SB 1368, which was subsequently signed into law by the Governor. SB 1368 directs the California Public Utilities Commission (CPUC) to adopt a GHG emission performance standard (EPS) for the future power purchases of California utilities. Accordingly, the new law would effectively prevent California utilities from investing in, otherwise financially supporting, or purchasing power from new coal plants located in or out of the state.

California Assembly Bill 32 (AB 32): In 2006, AB 32, the California Global Warming Solutions Act, was signed into law by Governor Schwarzenegger, giving CARB primary responsibility for reducing statewide GHG to 1990 levels by 2020.

Executive Order S-01-07: On January 18, 2007, California Governor Schwarzenegger mandated a statewide goal to reduce the carbon intensity of California's transportation fuel by at least ten percent by 2020 through S-01-07. The order also requires that a California Specific Low Carbon Fuel Standard be established for transportation fuels.

~~In June 2008, the Governor's Office of Planning and Research (OPR), which is the state of California's comprehensive planning agency, released the technical advisory document entitled 'CEQA and Climate Change: Addressing Climate Change through CEQA Review'. In this document, OPR provides interim guidance on how climate change should be addressed in CEQA documents until the CEQA Guidelines are amended on or before January 1, 2010 pursuant to SB 97. SB97 requires that GHG emissions be considered in evaluating projects.~~

~~It should be noted that OPR, with the assistance of CARB's technical staff, and the SCAQMD, are in the process of establishing CEQA GHG significance thresholds. Any significance threshold formally adopted by the SCAQMD would apply to projects located within the South Coast Air Quality Management District, while any CARB significance threshold would apply to projects located within the state. The progress of the proposed thresholds by OPR/CARB and the SCAQMD would be tracked for purposes of this Proposed Project and if additional guidance becomes available the report may be updated if applicable.~~

The California Air Resources Board (CARB) developed the Climate Change Scoping Plan in response to AB 32. The plan encompasses GHG emission reductions, expanded energy efficiency programs, increased utility renewable energy requirements, clean car standards, and low carbon fuels. It also developed a cap and trade program and identified discretionary measures to assist the state in meeting the 2020 limits established by AN 32. The scoping plan was updated in 2014 with regulations focused on key sectors of the economy.

#### Existing Onsite Conditions Related to Global Warming

The site currently reflects the rural agricultural setting common to the Julian area. Approximately 60 head of cattle are grazed on the site. No residences or other uses are currently in place on the site that would affect air quality or global climate change. It is anticipated that the existing/natural vegetation and soils at the Proposed Project Site currently store carbon emissions; however there is no identified or accepted methodology for calculating net changes in carbon storage associated with proposed development projects. Although there may be some loss of carbon storage with implementation of the Proposed Project (through removal of on-site vegetation and soils), the proposed landscaping as well as future agricultural uses of the Proposed Project Site would facilitate an equal amount of carbon storage.

### **3.1.3.2 Analysis of Project Effects and Determination as to Significance**

#### Air Quality Criteria

#### Guidelines for the Determination of Significance

The County of San Diego published the document *Guidelines for Determining Significance and Report Format and Content Requirements, Air Quality* (March 19, 2007), which provides guidance on determining Proposed Project-related air quality impacts. The guidance states that a project would have a significant air quality impact if it would:

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



2. Result in emissions that would violate any air quality standard or contribute substantially to an existing or proposed air quality violation.
3. Result in a cumulatively considerable net increase of PM<sub>10</sub> or exceed quantitative thresholds for O<sub>3</sub> precursors, oxides of nitrogen (NO<sub>x</sub>) and/or volatile organic compounds (VOCs).
4. Expose sensitive receptors (i.e., schools, hospitals, resident care facilities, or day-care centers) to substantial pollutant concentrations.
5. Create objectionable odors affecting a substantial number of people.
6. The potential to result in emissions of any TAC or HAP which result in a cancer risk of greater than 1 in 1 million without T-BACT, 10 in 1 million with T-BACT, or a health hazard index greater than or equal to 1, the project would result in a potentially significant impact.

#### Analysis

*Guideline 1: Conflict with or obstruct implementation of the San Diego RAQS or applicable portions of the SIP.*

A determination of whether the potential emissions resulting from operations of the Proposed Project would result in a significant impact is based on an evaluation of the extent to which the Proposed Project conforms to existing regional or local plans. The Proposed Project was assessed to determine consistency with the proposed SANDAG projections for growth within the area. The analysis has determined that the Proposed Project is consistent with the growth projections and therefore is consistent with the RAQS. This determination is based on a careful review of the SANDAG growth projections and the reasonably foreseeable cumulative projects in the San Diego Sub Regional Area (SRA). The Julian CPA, in which the Proposed Project is located, consists of approximately 1,551 single family residential units (in 2008). SANDAG projections indicate that residential demand would continue to increase in the Julian CPA through the year 2030, when it is estimated that the Julian CPA would consist of approximately 1,980 single family residential units. As a result, it is expected that an additional 429 single family residential dwelling units would be developed between 2008 and 2030. It should be noted that the Proposed Project along with reasonably foreseeable projects in the vicinity are not expected to develop more than the expected 429 single family residential dwelling units by the year 2030. Since the Proposed Project along with other cumulative projects does not plan to develop in excess of 429 single family residential dwelling units, it is assumed that the Proposed Project does not conflict with the RAQS as the growth projections do not exceed those in the RAQS. Guideline 1 is not exceeded and impacts are not significant. No mitigation is proposed.

*Guideline 2: Result in emissions that would violate any air quality standard or contribute substantially to an existing or proposed air quality violation.*

#### Construction Emissions:

The local air-quality standard to which the Proposed Project must comply would be based on San Diego County Guidelines for Determining Significance and Report Format and Content Requirements, Air Quality (March 19, 2007) which state that construction impacts are potentially significant if they exceed the quantitative

screening-level thresholds (SLTs) for attainment pollutants NO<sub>x</sub>, SO<sub>x</sub>, and non-attainment pollutants CO, and O<sub>3</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub>.

The County's Screening Level Thresholds (SLTs) establish the maximum acceptable level of a given GHG, as shown in Table 3-3-1, "Maximum Daily Emissions Thresholds."

In addition to impacts from criteria pollutants, Proposed Project-related impacts may include emissions of pollutants identified by the state and federal government as toxic air contaminants (TACs) or hazardous air pollutants (HAPs), which are toxic air pollutants known to have adverse human health effects. In San Diego County, the Department of Planning and Development Services identifies an excess cancer risk level of 1 in 1 million for projects that do not implement Toxics Best Available Control Technology (T-BACT), and an excess cancer risk of 10 in 1 million or less for projects that do implement T-BACT as the threshold for determining significance. These significance thresholds are consistent with SDAPCD's Rule 1210 requirements for stationary sources.

Rimpo and Associates, in association with various air districts throughout California, developed the Urban Emissions (URBEMIS) 2007 (version 9.2.4), land use and air pollution emissions computer model that is used to calculate the daily emissions increase associated with a Proposed Project. The URBEMIS 2007 model was used to forecast emissions levels for Proposed Project construction and operational activity for purposes of the Proposed Project.

Construction activities for the Proposed Project are anticipated to result in emissions of fugitive dust during the grading phase from heavy equipment usage and from construction workers' commuting to and from the site.

The analysis concluded that construction activities associated with the Proposed Project would result in emissions of CO, volatile organic compounds (VOCs), NO<sub>x</sub>, SO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub>. For purposes of this analysis, although the majority of the site would remain undisturbed for future agriculture use, a conservatively estimated maximum of 5 acres per lot (5 acres x 24 lots = 140 total acres) has the potential to be developed as a residential dwelling unit. The analysis assumes overlap of grading, underground utility construction, paving, architectural coating (painting), and physical building construction.

Table 3-3-2, "Summary of Construction Emissions (Pounds Per Day) With Project Design Considerations," shows the forecasts for the Proposed Project relative to each of the emissions areas presented below:

- Grading exhaust emissions
- Grading fugitive dust (PM10) emissions
- Underground utility construction exhaust emissions
- Paving exhaust emissions
- Architectural coatings
- Construction worker commuting
- Diesel-fired particulates and carcinogenic impacts

The Proposed Project encompasses an area of approximately 120 acres to be graded (24 lots x 5-acre lots), or 522,000 square meters. A more conservative 28 lots

was used for the analysis. Therefore an area source of 566,560 square meters (752.7m x 752.7m) was programmed into the model to represent the Proposed Project area. Based on the on-site maximum diesel exhaust emissions levels expected, the emission rate for PM<sub>10</sub> exhaust was programmed into the model in terms of grams per second per meter squared. To represent a worst-case scenario, diesel-fired PM<sub>10</sub> emissions from rough grading activity (rough grading activity accounts for the highest single phase of diesel-fired PM<sub>10</sub> levels) were modeled. Rough grading activity is expected to result in 6.22 pounds of PM<sub>10</sub> exhaust emissions per day (see Section 5.2.1.2 'Diesel-fired Particulates and Carcinogenic Impact,' in the final paragraph on page 27 of the Air Quality study).

Health risks associated with exposure to carcinogenic compounds are defined in terms of the probability of developing cancer as a result of exposure to a chemical at a given concentration. The cancer risk probability is determined by multiplying the chemical's annual concentration by its unit risk factor (URF). The URF is a measure of carcinogenic potential of a chemical when a dose is received through the inhalation pathway. It represents an upper-bound estimate of the probability of contracting cancer as a result of continuous exposure to an ambient concentration of one microgram per cubic meter (µg/m<sup>3</sup>) over a 70 year lifetime. The URF utilized in this analysis was obtained from the California Environmental Protection Agency, Office of Environmental Health Hazard (OEHHA).

To conservatively represent exposures, an exposure frequency of 365 days and exposure duration of 365 days (1 year) was assumed. For carcinogenic exposures associated with the maximum exposed individual (MEI), the risks were predicted to be 5.4E-07 (0.54 in one million) as presented on Table 3-3-3, "Quantification of Carcinogenic Risks and Noncarcinogenic Hazards (Short-Term Construction Activity)." Therefore risk estimates do not exceed the County of San Diego threshold of one in one million.

An evaluation of the potential noncancer effect of chronic exposures was also conducted. Adverse health effects are evaluated by comparing a compound's annual concentration with its toxicity factor or Reference Exposure Level (REL). The REL for diesel particulates was obtained from OEHHA for this analysis.

To quantify noncarcinogenic impacts, the hazard index approach was used. The hazard index assumes that chronic subthreshold exposures adversely affect a specific organ or organ system. To calculate hazard index, the chemical concentration or dose is divided by its REL. Where the total equals or exceeds one, a health hazard is presumed to exist. For purposes of this analysis the hazard index for the respiratory endpoint totaled less than one.

#### Design Considerations:

The Proposed Project would be required to reduce air quality effects as listed above to acceptable levels through a series of required design considerations. These design considerations have been derived from the San Diego County Grading Ordinance Section 87.428 on Dust Control Measures as well as from established Best Management Practices.

Design measures to curb mobile source emissions are also required in order to comply with Assembly Bill 32 and its supporting bills (e.g. AB 1493, which addresses CO<sub>2</sub> mobile emissions), as well as the low Carbon Fuel Standard.

The following design considerations are required as part of the Proposed Project construction activity to address these issues:

- Adhere to best management practices (BMPs) which include the application of water on disturbed soils three times per day (3.2 hour watering interval), covering haul vehicles, replanting disturbed areas as soon as practical (per the San Diego County Grading, Clearing and Watercourses Ordinance, section 87.417, effective April 23, 2004) and restricting vehicle speeds on unpaved roads to 15 miles per hour (mph) or less, to control fugitive dust.
- During construction activities, construction equipment shall be properly maintained to ensure proper timing and tuning of engines. Equipment maintenance records and equipment design specification data sheets shall be kept on-site during construction activity. It is conservatively estimated that keeping engines timed/tuned and reducing idling time would achieve a 5 percent reduction for emissions of VOCs, CO, NO<sub>x</sub>, SO<sub>x</sub>, and PM<sub>10</sub> exhaust emissions during construction activity.
- During grading activities, chemical soil stabilizers shall be applied to inactive areas to reduce fugitive dust emissions (per the San Diego County Grading, Clearing and Watercourses Ordinance, section 87.428, effective April 23, 2004). It is conservatively estimated that implementation of this measure would reduce PM<sub>10</sub> and PM<sub>2.5</sub> fugitive dust emissions by approximately 84 percent.
- During construction activities, contractor shall ensure that all equipment on-site would not idle for more than five (5) minutes.
- Contractor shall ensure use of low-sulfur diesel fuel in construction equipment as required by the California Air Resources Board (CARB).

With the implementation of the aforementioned design considerations, impacts resulting from construction emissions are not anticipated. Guideline 2 is not exceeded and impacts are not significant. No mitigation is proposed.

#### Operational Emissions:

Based on the *County of San Diego Guidelines for Determining Significance for Air Quality* (County of San Diego, 2007), operational emissions impacts would be potentially significant if they exceed the quantitative screening-level thresholds for attainment pollutants (NO<sub>x</sub>, SO<sub>x</sub>, and CO), and would result in a significant impact if they exceed the screening-level thresholds for non-attainment pollutants (ozone precursors, PM<sub>10</sub>, and PM<sub>2.5</sub>). A summary of operational emissions for winter and summer periods is provided in Table 3-3-4, "Summary of Operational Emissions," and shows the Proposed Project's emissions expectations as compared with the Guidelines for Determining the Significance of Air Quality.

Long-term operational activities associated with the Proposed Project would result in emissions of ROG, NO<sub>x</sub>, CO, PM<sub>10</sub>, PM<sub>2.5</sub> and SO<sub>x</sub>. Most of these emissions are the result of Proposed Project related traffic, but also include emissions resulting from natural gas usage, landscaping equipment, and repainting.

The results of the traffic analysis prepared by KOA Corporation indicate that no intersections would operate at a LOS E or worse with a peak-hour approach volume exceeding 3,000 vehicles; in fact, all intersections operate at LOS B or better. As a result CO levels are not anticipated to reach any threshold levels. Consequently,



sensitive receptors would not be significantly affected by CO emissions generated by Proposed Project related traffic.

The Proposed Project's emissions would not exceed the San Diego County SLTs, and Proposed Project related traffic is not anticipated to result in the creation of a CO hotspot. Guideline 2 is not exceeded and impacts are not significant. No mitigation is required.

*Guideline 3: Result in a cumulatively considerable net increase of  $PM_{10}$  or exceed quantitative thresholds for  $O_3$  precursors, oxides of nitrogen ( $NO_x$ ) and/or volatile organic compounds (VOCs).*

Section 4.3 of the document *County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements Air Quality* (March 19, 2007), provides the following guidelines for determining the cumulatively considerable net increases during the construction phase:

- A project that has a significant direct impact on air quality with regard to emissions of  $PM_{10}$ ,  $PM_{2.5}$ ,  $NO_x$  and/or VOCs, would also have a significant cumulatively considerable net increase.
- In the event direct impacts from a proposed project are less than significant, a project may still have a cumulatively considerable impact on air quality if the emissions of concern from the proposed project, in combination with the emissions of concern from other proposed projects or reasonably foreseeable future projects within a proximity relevant to the pollutants of concern, are in excess of the guidelines identified in Section 4.2.

#### Construction Emissions:

As shown in the previous section, the Proposed Projects not expected to result in emissions that would result in a significant direct impact on air quality relative to projected emissions of  $PM_{10}$ ,  $NO_x$ , and/or VOCs. Therefore, the Proposed Project is anticipated to comply with the first criterion listed above.

The analysis conducted in response to the second criterion above comes to a similar conclusion utilizing an equation from the South Coast air Quality Management District for purposes of determining localized  $PM_{10}$  concentrations, which describes the change in  $PM_{10}$  concentration versus downwind distance. The analysis shows that fugitive  $PM_{10}$  concentrations decrease by 90 percent from the Proposed Project boundary within 50 meters (165 feet) of the source. At 100 meters (330 feet)  $PM_{10}$  concentrations decrease by 99 percent; beyond 100 meters, concentrations approach zero. No cumulative contribution of  $PM_{10}$  beyond 150 meters would be physically possible.

Furthermore, emissions associated with construction activity are by nature short-term in duration. More specifically,  $PM_{10}$  emissions (as previously discussed) tend to settle out in close proximity to the source. For purposes of this analysis the source would be the grading area which the Proposed Project is expected to disturb on any given day. Thus, in order for the potential for cumulative  $PM_{10}$  impacts to occur, simultaneous construction and/or grading would need to occur on both a parcel of the Proposed Project Site and on another parcel that is located directly adjacent (within 150 meters) to the Proposed Project Site. Therefore, the likelihood of a cumulatively considerable contribution to  $PM_{10}$  from the Proposed Project in conjunction with adjacent projects is highly unlikely.

Additionally, project design considerations identified for the Proposed Project would remain applicable, and other cumulative projects would also need to comply with local ordinances prohibiting nuisances or requiring dust control. These measures would further reduce the cumulative effect of fugitive PM<sub>10</sub> emissions.

The Proposed Project therefore complies with the second criterion.

The following design considerations are required in order to maintain emissions levels within acceptable limits:

- Adhere to best management practices which include the application of water on disturbed soils three times per day (3.2 hour watering interval), covering haul vehicles, replanting disturbed areas as soon as practical and restricting vehicle speeds on unpaved roads to 15 mph or less to control fugitive dust.
- During construction activities, construction equipment shall be properly maintained to ensure proper timing and tuning of engines. Equipment maintenance records and equipment design specification data sheets shall be kept on-site during construction activity. It is conservatively estimated that keeping engines timed/tuned and reducing idling time would achieve a 5 percent reduction for emissions of VOCs, CO, NO<sub>x</sub>, SO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> exhaust emissions during construction activity.
- During construction activities, contractor shall ensure that all equipment on-site would not idle for more than five (5) minutes.
- Contractor shall ensure use of low-sulfur diesel fuel in construction

#### Operational Emissions:

Section 4.3 of the document County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements Air Quality (March 19, 2007), indicates that the following guidelines must be used for determining the cumulatively considerable net increases during the operational phase:

- A project that does not conform to the RAQS and/or has a significant direct impact on air quality with regard to operational emissions of PM<sub>10</sub>, PM<sub>2.5</sub>, NO<sub>x</sub>, and/or VOCs, would also have a significant cumulatively considerable net increase.
- Projects that cause road intersections or roadway segments to operate at or below a LOS E and create a CO 'hotspot' create a cumulatively considerable net increase of CO.

County Guidelines for Determining Significance for Air Quality state further the assumption that a project which conforms to the County of San Diego General Plan and does not have emissions exceeding the SLTs would not create a cumulatively considerable net increase in criteria pollutants. This is because the emissions have already been accounted for in the RAQS.

For operational activity, the Proposed Project complies with the first criterion as the Proposed Project is not expected to result in a significant direct impact on air quality with regard to emissions of VOCs, CO, PM<sub>10</sub>, and PM<sub>2.5</sub> (as described in the previous section). The Proposed Project is also consistent with SANDAG growth projections for the Proposed Project area and hence is consistent with the RAQS forecast. Based on the operational emissions, this Proposed Project results in a less than significant cumulatively considerable impact.

It should be noted that the results of the analysis indicate no CO 'hotspots' are expected to form as a result of cumulative and project-related traffic.

The Proposed Project is not expected to result in any emissions that exceed the SLTs for operational activity, thus no additional design considerations or mitigation measures are required. Guideline 3 is not exceeded, and impacts are less than significant. No mitigation is necessary.

*Guideline 4: Expose sensitive receptors (i.e., schools, hospitals, resident care facilities, or day-care centers) to substantial pollutant concentrations.*

Sensitive receptors can include uses such as long term health care facilities, rehabilitation centers, and retirement homes, as well as residences, schools, playgrounds, child care centers, and athletic facilities. In evaluating impacts to sensitive receptors, the two primary emissions of concern are CO and diesel particulate matter emissions.

There are no sensitive receptors located near the Proposed Project boundary. There are several residences located across Pine Hills Road on the east, but the residence closest to a proposed pad is 300 feet away. This is the distance beyond which the county has determined that agricultural nuisances such as noise would not be noticeable.

A screening-level health risk assessment was conducted to determine the potential for the Proposed Project to result in a significant impact on nearby sensitive receptors during short-term construction activity. For purposes of this analysis, the primary pollutant of concern was diesel particulate matter (DPM) which is emitted by the operation of heavy diesel equipment during construction activity.

Since the Proposed Project does not exceed any of the SLTs, a less than significant impact to sensitive receptors is expected.

Based on the analysis conducted as part of the overall Air Quality study, the Proposed Project would not result in a significant impact to sensitive receptors. Guideline 4 is not exceeded, and impacts are less than significant. No mitigation is necessary.

*Guideline 5: Create objectionable odors affecting a substantial number of people.*

As mentioned previously, sensitive receptors include uses such as long term health care facilities, rehabilitation centers, retirement homes, residences, schools, playgrounds, child care centers, and athletic facilities.

Section 4.5 of the document County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements Air Quality (March 19, 2007), indicates that, in general, a project would not have a significant odor impact if the following is true:

- The project which is not an agricultural, commercial or industrial activity subject to SDAPCD (San Diego Air Pollution Control District) standards, as a result of implementation would either generate objectionable odors or place sensitive receptors next to existing objectionable odors, which would affect a considerable number of persons or the public.

The Proposed Project would be subject to applicable SDAPCD rules, and conditions may be applied (or control equipment required) where necessary to prevent occurrence of public nuisance.

In evaluating impacts to sensitive receptors, the two primary emissions of concern are CO and diesel particulate matter. As noted above, the Proposed Project conforms to the SLTs and would therefore not have impacts related to CO and diesel particulate matter.

Uses such as the ones proposed by the agricultural component of the Proposed Project may introduce odor-causing substances such as manure. This effect is minimized by the large lot design and the separation between on- and offsite uses. This type of land use and design is common in the area. Therefore, no significant impacts would occur.

Under the Agricultural Enterprises and Consumer Information Ordinance, the Proposed Project is required to provide notice in writing to each prospective purchaser about potential agricultural operational issues that may occur on surrounding property and onsite. Purchasers of the property may be required to accept inconveniences such as odors, unless the agricultural use itself constitutes a public or private nuisance under the provisions of the Civil or San Diego County Code (see also agricultural analysis in section 3.1.2.2 of this [DEIR/FEIR](#)).

Based on the aforementioned criteria and analysis, the Proposed Project is not expected to result in a significant odor impact. Guideline 5 is not exceeded, and impacts are not significant. No mitigation would be necessary.

*Guideline 6: If a project has the potential to result in emissions of any TAC or HAP which result in a cancer risk of greater than 1 in 1 million without T-BACT, 10 in 1 million with T-BACT, or a health hazard index greater than or equal to 1, the project would result in a potentially significant impact.*

For carcinogenic exposures associated with the maximum exposed individual (MEI), the risks were predicted to be 0.54 in one million. Therefore risk estimates do not exceed the County of San Diego threshold of one in one million. Impacts are less than significant, and no mitigation would be necessary.

#### Global Climate Change Criteria

#### Guidelines for the Determination of Significance

##### *Background*

In January 2015 the County of San Diego issued the 2015 GHG Guidance, Recommended Approach to Addressing Climate Change in CEQA Documents (County of San Diego, Planning and Development Services (PDS), January 21, 2015). the latest Guidelines for Determining Significance (County of San Diego, Planning and Development Services (PDS), January 21, 2015). In that document the County recommends using screening thresholds published by California Air Pollution Control Officer's Association (CAPCOA) for determining the need for a Climate Change Analysis to determine the need for mitigation for GHG related impacts under CEQA. It suggests that a project that projects producing more than 900 metric tons of CO<sub>2</sub> would be required to conduct a Climate Change Analysis and demonstrate a 16 percent reduction in GHG emissions through project design features and/or mitigation measures when emissions are compared to a 'business as usual' scenario. The Guidance has been developed from the requirements of AB 32 and addresses potential cumulative impacts that a project's GHG emissions could have on global climate change. Conversely, projects producing less than 900 metric tons



would be considered to result in less than significant impacts related to GHG emissions.

In addition to calculating projected project emissions for the year 2020, the County also recommends, but it is not currently discussed within the Guidance document, conducting an emissions projection for the horizon years 2030 and 2050, consistent with Executive Orders B-30-15 and S-3-05 and discuss the progress that a project would make toward achieving the GHG reduction goals for those years. A 900 metric ton screening criteria (CO<sub>2</sub> generated annually) referenced in the CAPCOA white paper (<http://www.capcoa.org/>) is relatively conservative criteria for determining which projects require further analysis and mitigation with regard to Climate Change. Although the Proposed Project is estimated to produce 861.78 metric tons of CO<sub>2</sub>Eq/year which is below the screening criteria, a climate change analysis has been prepared to consider project specific details that evaluate the Proposed Projects potential contribution to climate change.

As indicated in section 15064(b) of the State CEQA Guidelines, the determination of significance of greenhouse gases is not 'ironclad;' rather, the "determination of whether a project may have a significant effect on the environment calls for a careful judgment" by the lead agency "based to the extent possible on scientific and factual data."

Assembly Bill 32 (AB 32) is the Global Warming Solutions Act of 2006 which established a comprehensive program for the reduction of greenhouse gas emissions in the state of California. AB32 charges the California Air Resources Board (CARB) with establishing regulations and market mechanisms that would reduce California's overall greenhouse gas emissions to 1990 levels by the year 2020, representing a roughly 25 percent reduction in emissions statewide. As of the writing of this report, CARB is still in the process of establishing CEQA GHG significance thresholds.

Additionally, the County of San Diego has not yet adopted a numeric threshold of significance for emissions of greenhouse gases, and although the County has issued interim guidance it is in the process of being updated due to statewide efforts for a consistent threshold to be established by CARB.

### *Significance Guideline*

In a report released in December of 2008, CARB has determined that, absent the finalization of any climate change mandates (such as AB32), California's projected 2020 greenhouse gas emissions would be 596 million metric tonnes carbon dioxide equivalent (MMCO<sub>2</sub>e). CARB has also determined that California's 1990 greenhouse gas emissions totaled 427 MMTCO<sub>2</sub>e. Therefore, to satisfy the requirements of AB 32, California needs to reduce its overall 2020 emissions for all sectors by 169 MMTCO<sub>2</sub>e, or 28.3 percent below the Business As Usual (BAU) projection.

Therefore, for the purposes of this analysis a significance threshold is exceeded if

1. the Proposed Project would have a significant impact to global climate change if it generate more than 900 metric tons of CO<sub>2</sub>e on an annual basis. ∴
1. Creates GHG emissions totaling less than a 28.3 percent reduction in GHG emissions compared to BAU conditions.

~~The design of the proposed buildings would be required to meet the current Title 24 requirements (Title 24, Part 6 of the California Code of Regulations; Energy Efficiency Standards for Residential and Non-residential Buildings 201308).~~

~~With implementation of energy-efficient measures and design features planned for the Proposed Project, the projected 2020 emissions for the Proposed Project are estimated to be 583.9 metric tons of CO<sub>2</sub> per year.~~

### Analysis

~~*Guideline 1: The Proposed Project would generate more than 900 metric tons of CO<sub>2</sub>e annually. Create GHG emissions totaling less than a 28.3 percent reduction in GHG emissions compared to 'business as usual' conditions.*~~

~~The stated guideline for the Proposed Project is to create GHG emissions which, in the aggregate, total a 28.3 percent or greater reduction in GHG in comparison with 'business as usual' conditions. Emissions measured from 2006 are used as 'business as usual' markers for this comparison. Because the County requires overall compliance with the 'less than 28.3 percent' standard, the analysis of compliance would appear at the end of this section, reviewing both construction and operational GHG emissions combined.~~

~~GHG emissions associated with the development and operation of the Proposed Project were estimated for the following categories:~~

- ~~1. Increases in emissions from short term construction activity (fossil-fuel consumption).~~
- ~~2. Increase in emissions from electricity generation to provide power to project uses.~~
- ~~3. Increase in emissions from natural gas use for project uses.~~
- ~~4. Increase in emissions from water consumption for project uses.~~
- ~~5. Increase in emissions from vehicular-exhaust emissions from daily vehicular activity as a result of the project.~~
- ~~6.1. Increase in emissions as a result of increased municipal solid waste generated by the proposed project.~~

### Construction GHG Emissions

~~The Proposed Project would be expected to take approximately 12 months to complete. The grading operations are expected to take up to six months, with trenching and paving taking an additional two months. Residential buildings will be built out over a four to six month period. The earliest buildout would occur no sooner than late 2017. Table 4.1 of Appendix I shows the expected timeframes for the construction process. The analysis assumes the construction of residential structures though sales will be on an individual lot basis driven by market demand. Therefore this analysis assumes a worst case scenario for emission timing. Additionally, it is assumed that each vehicle trip would follow a rural setting as modeled within the CalEEMod computer program.~~

~~Using the vehicle mix in Table 4.1 of Appendix I, the CalEEMod computer analysis produced results shown in Table 3-3-6, "Expected Greenhouse Gas CO<sub>2</sub>e Emissions Summary." Emissions are 510.63 metric tons (MT) over the life of the~~

~~Project. Assuming a 20 year Project life, the amortized annual amount of emissions each year would be 25.53 MT. During the construction phase of the Proposed Project, GHG emissions would be released in the operation of fossil-fuel-powered construction equipment. Emission forecasts for carbon dioxide (CO<sub>2</sub>) and methane (CH<sub>4</sub>) were calculated based on CARB's OFFROAD 2007 emissions inventory model and associated South Coast Air Quality Management District (SCAQMD) methodology. Emissions of nitrous oxide resulting from construction equipment were estimated based on emission factors provided in the document General Reporting Protocol for the Voluntary Reporting Program (The Climate Registry, October 29, 2007) and CARB's OFFROAD 2007 model. Since the specific construction equipment that would be used on the Proposed Project and the timing or phasing estimates are not known at this time, the URBEMIS 2007 emissions inventory model was utilized to develop a relevant equipment inventory and duration for projects of similar scope.~~

~~Exhaust emissions from rough grading, underground utility, and paving activity result from both on-road and off-road heavy equipment operating during this activity.~~

~~The Proposed Project's design considerations incorporate existing regulations, such as Pavely I and II, which include requirements that are expected to yield a 48.2 percent reduction from mobile source emissions. One such requirement is the use of up to 20 percent biodiesel in construction equipment to the maximum extent possible, which will be required as a design feature.~~

#### Operational GHG Emissions:

##### *~~GHG Emissions: Electricity~~*

~~Once construction is completed, the Proposed Project would generate air and GHG emissions from daily operations which would include factors such as area sources, energy use, mobile sources, solid waste generation, and water uses, all of which are calculated within the CalEEMod program. Area sources include fire places in all units, consumer products, landscaping, and architectural coatings as part of regular maintenance. Energy uses would include electricity and natural gas.~~

~~Whenever land uses are changed and alterations are made to the landscaping the amount of carbon dioxide that vegetation can sequester is also changed. The Project would be a rural residential development and each lot is assumed to reduce the amount of vegetative cover by 0.5 acres. The overall change in sequestered CO<sub>2</sub> was incorporated into the CalEEMod model. Results for the CalEEMod run are provided in Attachment A of Appendix I.~~

~~The model was run using a combination of default and San Diego –specific settings. Specifically, the Proposed Project location and San Diego Gas and Electric averages for utility emissions were utilized. The operational emissions are presented in Table 3-3-7. The Proposed Project will emit approximately 639.66 MT of CO<sub>2</sub>e during a typical year.~~

~~Combining the construction and operations emissions produces a total annual emission of 665.22 MT. Loss of vegetative cover would reduce sequestration by 51.72 MT. Therefore the total annual emission would be 742.47 MT of CO<sub>2</sub>e. This is below the screening threshold of 900 MT per year set by the County. Therefore the Proposed Project would not generate significant emission impacts. No mitigation is required. While not released on-site, increased GHG emissions resulting from the added electrical demands of the Proposed Project would be created, since electricity~~

is often generated through the burning of coal, oil, or natural gas. GHG emissions resulting from Proposed Project energy use were calculated based on average annual energy usage rates published by the United States Energy Information Administration (2003). Power generation emission factors were obtained from the U.S. EPA's eGRID2006 database for the California/Mexico subregion. In order to forecast the GHG emissions resulting from natural gas combustion, usage estimates consistent with the URBEMIS 2007 model were used. The design of the proposed buildings would be required to meet the current Title 24 requirements (Title 24, Part 6 of the California Code of Regulations; Energy Efficiency Standards for Residential and non-residential Buildings 2008).

#### *Energy GHG Emissions: Natural Gas*

GHG emissions from natural gas usage were calculated based on U.S. EPA emission factors (Compilation of Air Pollutant Emission Factors, Volume 1, Chapter 1, External Combustion Sources—Emission Factors for Criteria Pollutants and Greenhouse Gases from Natural Gas Combustion, Table 1.4-2).

#### *Energy GHG Emissions: Water Consumption*

Emissions of GHG would also occur as a result of Proposed Project water consumption. Water use and energy consumption are closely linked, especially in Southern California where water supplies are limited and a significant portion of the water supply must be imported. Large amounts of energy are required for the conveyance, treatment, distribution, and end use of water, as well as wastewater treatment. Water consumption estimates are based on water usage estimates from the American Water Works Association.

#### *Transportation GHG Emissions*

The majority of GHG emissions associated with the daily project operations are the result of increased project-related motor vehicle activity. Emissions for carbon dioxide, methane, and nitrous oxide were calculated using trip generation rates from the project traffic study.

#### *Solid Waste GHG Emissions*

GHG emissions would also occur as a result of municipal solid waste generated by the proposed project. Solid waste generated by the proposed project has the potential to be disposed of in a landfill, where it would emit methane gas as it decomposes. Solid waste generation rates were estimated utilizing data provided by the California Integrated Waste Management Board, and emissions of methane gas resulting from project-generated solid waste were estimated utilizing data provided in the document Solid Waste Management and Greenhouse Gases (United States Environmental Protection Agency, September 2006).

Table 3-3-5, "Total Greenhouse Gas Emissions (Metric Tons Per Year)," provides a summary of detailed calculations for the construction and operational emissions identified above. This GHG reduction is based upon the following assumptions:

- 21 percent reduction of mobile source emissions with implementation of Paveley.
- 10 percent reduction of construction emissions with implementation of LCFS.
- 21 percent reduction in energy use emission due to Renewable Portfolio Standards.



- ~~5 percent reduction in energy use and natural gas emissions with Proposed Project compliance with current Title 42 standards.~~

#### Global Climate Change Construction and Operational Emissions: Conclusion

~~The Proposed Project's forecasted reduction in GHG emissions would be the result of conforming to the AB 32 reduction target of 28.3 percent from 'business as usual', by yielding an approximate 30.58 percent reduction overall. Furthermore, in addition to assessing the Proposed Project's emissions with respect to 2004 State levels, a comparison of the Proposed Project's emissions to the draft interim thresholds under consideration by CARB has been conducted to assist the County in determining whether the Proposed Project's greenhouse gas emissions are cumulatively considerable.~~

~~The Proposed Project, with implementation of the proposed design features and recommended measures by the California Attorney General, is consistent with a number of CARB's proposed performance standards. The proposed design features for air quality and GHG are presented in Section 7.6 of this document.~~

~~CARB's interim draft thresholds establish a numeric value only for industrial projects and currently they do not define the 'upper limit on project emissions'. It is anticipated that the CARB upper limit project emissions for residential/commercial projects would fall within the general range of the proposed industrial project numerical threshold of 7,000 metric tons of CO<sub>2</sub> Eq/year and the CARB mandatory reporting requirement for industrial projects of 25,000 metric tons of CO<sub>2</sub> Eq/year.~~

~~Given that the Proposed Project is expected to generate approximately 1,619.37 metric tons of CO<sub>2</sub> Eq/year under 'business as usual' conditions, and 1,124.13 metric tons of CO<sub>2</sub> Eq/year under 2020 conditions with the Proposed Project, a reduction of approximately 30.58 percent of GHG emission is anticipated for the Proposed Project. Since this exceeds the AB 32 reduction target of 28.3 percent, the Proposed Project is determined to have no impacts associated with global climate change.~~

~~Guideline 1 is not exceeded, and impacts are not significant. No mitigation is required.~~

### **3.1.3.3 Cumulative Impact Analysis**

#### Air Quality

##### *Construction Emissions: Cumulative Effects*

Section 4.3 of the *County of San Diego's Guidelines for the Determination of Significance Report Format and Content Requirements Air Quality* (March 19, 2007) provides the following guidelines for the determination of cumulative impacts regarding air quality:

1. A project that has a significant direct impact on air quality with regard to emissions of PM<sub>10</sub> , O<sub>3</sub>, NO<sub>x</sub>, and/or VOCs, would also have a significant cumulatively considerable net increase.
2. In the event direct impacts from a proposed project are less than significant, a project may still have a cumulatively considerable impact on air quality if the emissions of concern from the proposed project, in combination with the emissions of concern from other proposed projects or reasonably foreseeable future projects within a proximity relevant to the pollutants of concern, are in excess of the guidelines identified in Section 4.2.

Guideline 3 in the air quality section above analyzes cumulative impacts relative to PM<sub>10</sub>, O<sub>3</sub>, NO<sub>x</sub>, and/or VOCs. The data shows that PM<sub>10</sub> concentrations relative to distance from the source drop off dramatically, making it highly unlikely that a cumulative effect to air quality could take place. Specifically, the report states that for cumulative impacts to occur, grading activities on a directly-adjacent (within 150 meters) parcel would need to occur simultaneously with grading on the subject property. Since no development projects are anticipated adjacent to the subject property, cumulative impacts associated with PM<sub>10</sub> emissions would be less than significant and no mitigation would be necessary.

The report also concludes that project design considerations which would prohibit nuisances for the Proposed Project are recommended for all projects; because any other project in the area would also be required similar design considerations, cumulative impacts are not anticipated, and no mitigation would be necessary.

#### *Operation Emissions: Cumulative Effects*

Section 4.3 of the County of San Diego's Guidelines for the Determination of Significance Report Format and Content Requirements Air Quality (March 19, 2007) provides the following guidelines for the determination of cumulative net increases during the operation phase as relates to air quality:

1. A project that does not conform to the RAQs and/or has a significant direct impact on air quality with regard to operational emissions of PM<sub>10</sub>, PM<sub>2.5</sub>, NO<sub>x</sub>, and/or VOCs, would also have a cumulatively considerable net increase.
2. Projects that cause road intersections or roadway segments to operate at or below a LOS E and create a CO 'hotspot' create a cumulatively considerable net increase of CO.

The Proposed Project is not anticipated to result in a significant direct impact on air quality with regard to emissions of VOCs, CO, PM<sub>10</sub>, or PM<sub>2.5</sub>, nor is it anticipated to create any CO 'hotspots'. The Proposed Project is also consistent with SANDAG growth projections for the Proposed Project area and hence is also consistent with the RAQs forecast. Based on the analysis, the Proposed Project results in a less than significant cumulative impact.

#### *Global Climate Change: Cumulative Effects*

~~Due to the overwhelming scope of GCC, no single development project would have a substantial effect on GCC. The Project does not exceed the screening level threshold of 900 MT set by the County. Therefore its cumulative impact is not significant. Due to the overwhelming scope of GHG emissions, which is literally a global issue, the Project does not rise to the level of a significant contribution of GHG emissions. Impacts are not significant and no mitigation is required. No single development can be deemed individually responsible for global temperature increases and rising sea levels. Instead, GHG emissions from the proposed project would combine with GHG emissions emitted across California, the United States, and the world to cumulatively contribute to GCC. Therefore, this analysis considers GCC on a cumulative basis.~~

~~Because~~ The nature of climate change analysis is cumulative in scope, and ~~therefore~~ the substance of the cumulative discussion appears within the prior section's analysis.

~~It is estimated that the Proposed Project would result in emissions of approximately 1,619.37 metric tons of CO<sub>2</sub>Eq per year for 'business as usual' conditions, and 1,124.13 metric tons of CO<sub>2</sub>Eq per year for 2020 conditions. The Proposed Project is designed with appropriate design considerations which would reduce total greenhouse gas emissions by 30.58 percent, which is well above the 28.3 percent goal established by AB32.~~

~~The analysis concluded that GHG emissions expected from the Proposed Project would not contribute to any cumulatively significant impact, and no mitigation would be necessary.~~

#### **3.1.3.4 Significance of Impacts Prior to Mitigation**

The Proposed Project has no significant effects with respect to air quality or GCC.

#### **3.1.3.5 Conclusion**

##### Air Quality

Construction activities for the Proposed Project are anticipated to result in emissions of fugitive dust during the grading phase from heavy equipment usage and from construction workers' commuting to and from the site. During short-term construction activity, it is anticipated that emissions would not exceed the criteria pollutant thresholds established by the County of San Diego CEQA Guidelines for Determining Significance for Air Quality, and therefore a less than significant impact is expected.

Operational emissions from the Proposed Project are also anticipated. Most of these emissions are the result of project related traffic, but also include emissions resulting from natural gas usage, landscaping equipment, and painting. The analysis has concluded that emissions generated during long-term project operational activity would not exceed significance thresholds for criteria pollutant emissions. It should be noted that results of the analysis indicate that the Proposed Project would not result in any CO 'hotspots,' thus the Proposed Project is not expected to result in adverse impacts for emissions of CO. Because the Proposed Project would not exceed San Diego County Screening Level Thresholds (SLTs) or any County of San Diego significance thresholds, the Proposed Project would not result in a significant impact.

A screening-level health risk assessment was conducted to determine the potential for the Proposed Project to result in a significant impact on nearby sensitive receptors during short-term construction activity. The results of the health risk assessment indicate that the Proposed Project would not result in a significant impact to nearby sensitive receptors during short-term construction activity.

The analysis also concluded that the Proposed Project would not result in a significant odor impact.

##### Global Climate Change

The Global Climate Change Analysis report considered construction and operational emissions as part of the overall Proposed Project effects. Construction emissions of 510.23 MT over the life of the Project were amortized over the life of the project, assumed conservatively to be 20 years. The resulting annual emission was 25.53 MT. Operational emissions encompassed a range activities, from area-specific actions such as fire places and landscaping, to vehicle emissions, energy use, solid waste generation, and water use. Total annual operational omissions were

~~calculated at 639.68 MT, concluded that the 'business as usual' scenario for the Proposed Project would result in emissions of approximately 1,619.37 metric tons of CO<sub>2</sub>-Eq per year for the "business as usual" condition, and 1,124.13 metric tons of CO<sub>2</sub>-Eq per year for the 2020 conditions.~~

~~Combining the construction and operations emissions produces a total annual emission of 665.22 MT. Loss of vegetative cover would reduce sequestration by 51.72 MT. Therefore the total annual emission would be 742.47 MT of CO<sub>2</sub>e. This is below the screening threshold of 900 MT per year set by the County. Therefore the Proposed Project would not generate significant emission impacts. No mitigation is required. With implementation of the design features for the Proposed Project, the projected 2020 emissions for the are estimated to be 1,124.13 metric tons of CO<sub>2</sub>-Eq per year.~~

~~Due to the overwhelming scope of GCC, no single development project would have a substantial effect on GCC. No single development can be deemed individually responsible for global temperature increases and rising sea levels. The Proposed Project does not exceed the 900 MT threshold for further analysis. Therefore it is concluded that it does not have a significant impact cumulatively. This is due to the overwhelming scope of GHG emissions, which are literally a global issue. Impacts are not significant. Instead, GHG emissions from the Proposed Project would combine with GHG emissions emitted across California, the United States, and the world to cumulatively contribute to GCC. Therefore, this analysis considers GCC on a wider-scaled cumulative basis.~~

~~Implementation of the Proposed Project design features and compliance with the state/federal laws would result in a 30.58 percent reduction, which is greater than 28.3 percent reduction in GHG emissions compared to 'business as usual' as shown on Table 3-3-5 (previously presented). Proposed Project impacts associated with global climate change are therefore considered less than significant. No mitigation is required.~~

### 3.1.4 Geologic Resources

A geologic survey of the Hoskings Ranch TM5432<sup>2</sup> Project Site was conducted by Rob Schumann of AECOM. The resulting report, *Geologic Reconnaissance Study, 1,416.5-Acre Hoskings Ranch, Julian, San Diego County, California*, is dated February 2011. The study is provided as Appendix J in the Technical Appendices of this **DEIR/FEIR**.

#### 3.1.4.1 Existing Conditions

The Proposed Project Site is located in the central part of San Diego County. Onsite elevations range from approximately 3,100 to 4,200 feet above mean sea level (AMSL) with gradients ranging from gently-sloping hills along the northeastern portion of the property to steep cliffs along the southwestern side of the property.

The Proposed Project is in the Julian Region of the Peninsular Range Province, a 300-mile long California geomorphic province with a long and active geologic history. This portion of the province is predominantly composed of rocks of the Southern California Batholith and generally consists of Mesozoic-aged granitic rock with steep alluvium-filled valleys. Residuum, organic-rich topsoil and minor amounts of alluvium exist in onsite drainages.



Hydrology on the site is associated with fractured bedrock. A number of small linements (potential fault and/or fracture zones) occur in and around the property.

The near surface geology of the Proposed Project Site mainly consists of decomposed granite and in many areas, bedrock is exposed at the surface. Soils on the site consist of the following three types: Sheephead, Holland and Crouch. The Sheephead series consists of well-drained, shallow fine sandy loams and comprise the surface soils for a majority of the western and central portions of the site. Erosion hazard for these soils is high to very high with moderate sheet erosion potential. The Holland series is well-drained, with moderately-deep and deep fine sandy loams. Located on the mountainous uplands, they compose the surface soils on the majority of the site. The erosion hazard for these soil types ranges from slight to very high. The Crouch series is well-drained with deep to moderately-deep coarse sandy loams. These soils are found in the eastern portion of the site and erosion hazard for these soils ranges from moderate to very high.

Surrounding properties are relatively undeveloped, with widely spaced single-family homes located on large parcels. Many of the homes are located on parcels of 10 acres or greater, and often have orchards or cattle grazing on the property. The Pine Hills housing development to the south features home on smaller lots.

#### Regulatory Framework

The following list details the most significant Federal, State and local regulations that apply to San Diego County.

#### Federal Regulations and Standards

##### *National Environmental Policy Act (NEPA)*

The National Environmental Policy Act of 1969 requires that geologic hazards be considered when assessing the environmental impact of proposed federal projects.

##### *USGS Landslide Hazard Program*

Law 106-113 created this program. The Federal Emergency Management Agency (FEMA) is the responsible agency for the long-term management of natural hazards. The Federal government takes the lead role in funding and conducting research, whereas the reduction of losses due to geologic hazards is primarily a State and local responsibility.

#### State Regulations and Standards

##### *California Environmental Quality Act (CEQA)*

Under CEQA, lead agencies are required to consider impacts from geologic hazards. The CEQA Guidelines are concerned with assessing impacts associated with geologic hazards that exist or may be created by project implementation.

##### *Alquist-Priolo Earthquake Fault Zoning Act (AP Act)*

This State law requires that proposed developments incorporating tracts of four or more dwelling units investigate the potential for ground rupture within AP Zones. These zones serve as an official notification of the probability of ground rupture during future earthquakes.

*Policies and Criteria of the State Mining and Geology Board with reference to the Alquist-Priolo Earthquake Fault Zoning Act*

This subchapter sets forth the policies and criteria of the State Mining and Geology Board that govern the government's responsibilities to prohibit the locations of developments and structures for human occupancy across the trace of active faults within AP Zones.

*Seismic Hazards Mapping Act*

This Act passed by the State in 1990 addresses non-surface fault rupture earthquake hazards, including liquefaction and seismically induced landslides. No seismic hazard maps have been completed by the State for the County of San Diego.

*Uniform Building Code*

The Uniform Building Code (UBC) is the primary means for authorizing and enforcing procedures and mechanisms to ensure safe building standards. The UBC uses a hazard classification system to determine what protective measures are required to protect human health and property. To ensure that these safety measures are met, the UBC employs a permit system based on hazard classification.

*California Building Code*

The California Building Code (CBC), which was most recently adopted in 2012 stringent seismic provisions for hospitals, schools, and essential facilities, as well as additional requirements for "green" building.

Local Regulations and Standards

*San Diego County General Plan, Seismic Safety Element (Part V)*

The Seismic Safety Element of the General Plan provides background information, policies, and measures for protection of the public from unreasonable risks associated with the effects of seismically induced surface rupture, ground shaking, ground failure, tsunami, seiche, slope instability leading to landslides, subsidence and other geologic hazards. Maps of known seismic and other geological hazards are included.

*San Diego County Zoning Ordinance Fault Displacement Area Regulations*

County Zoning Ordinance Sections 5400-5406 implement the requirements of the Alquist-Priolo Act. The provisions of sections 5400-5406 outline the allowable development, the permitting requirements, and the construction limitations within Fault Rupture Zones, as designated by the Alquist-Priolo Act.

For a non-discretionary permit such as a building permit, the Department of Planning and Development Services, Building Division requires any above-surface structure to conform to the seismic requirements of the CBC and to incorporate the design recommendations contained within the soils and geologic report as required per the Code.

*San Diego County Grading Ordinance, Chapter 4 – Design Standards and Performance Requirements*

Chapter 4 of the County Grading Ordinance (which commences at Section 87.101 of the County Code) includes requirements for the maximum slope allowed for cut and fill slopes, the requirement for drainage terraces on cut or fill slopes exceeding 40 feet in height, expansive soil requirements for cuts and fills, minimum setback requirements for buildings from cut or fill slopes, and reporting requirements including a soil engineer's report and a final engineering geology report by an

engineering geologist, which includes specific approval of the grading as affected by geological factors.

#### **3.1.4.2 Analysis of Project Effects and Determination as to Significance**

The guidelines pertaining to each subsection of geology are from the County of San Diego Land Use and Environmental Group 2007 Guidelines for the Determination of Significance, Geologic Hazards.

##### Unique Geology

##### Guidelines for the Determination of Significance

The following significance guideline is used to determine whether a significant impact to a unique geologic feature would occur as a result of a project implementation:

1. The project, as designed, would materially impair a unique geologic feature by destroying or altering those physical characteristics that convey the uniqueness of the resource. A geologic feature is unique if it meets one of the following criteria. It
  - a. Is the best example of its kind locally or regionally;
  - b. Embodies the distinctive characteristics of a geologic principle that is exclusive locally or regionally;
  - c. Provides a key piece of geologic formation important in geology or geologic history;
  - d. Is a "type locality" of a formation;
  - e. Is a geologic formation that is exclusive locally or regionally;
  - f. Contains a mineral that is not known to occur elsewhere in the County; or
  - g. Is used repeatedly as a teaching tool.

##### Analysis

*Guideline 1: The project, as designed, would materially impair a unique geologic feature by destroying or altering those physical characteristics that convey the uniqueness of the resource.*

Field investigations and a review of aerial photographs indicate that there are no locations on the Proposed Project Site that could be categorized as unique rock outcrops since they do not match the criteria outlined above. Although there are rock formations and geologic structures that are exposed in the Julian area that are both distinctive and interesting, they are not found within the Proposed Project boundaries and would therefore not be impacted by the Proposed Project. Guideline 1 is not exceeded. Impacts are not significant and no mitigation is required.

##### Landslides

##### Guidelines for the Determination of Significance

According to the County of San Diego's Guidelines, landslides would be considered a significant impact to the project if:

1. The project site would expose people or structures to substantial adverse effects, including the risk of loss, injury or death involving landslides.
2. The project is located on a geologic unit or soil that is unstable, or would become unstable as a result of the project, potentially resulting in an on- or off-site landslide.
3. The project site lies directly below or on a known area subject to rockfall which could result in collapse of structures.

#### Analysis

*Guideline 1: The project site would expose people or structures to substantial adverse effects, including the risk of loss, injury or death involving landslides.*

*Guideline 2: The project is located on a geologic unit or soil that is unstable, or would become unstable as a result of the project, potentially resulting in an on- or off-site landslide.*

*Guideline 3: The project site lies directly below or on a known area subject to rockfall which could result in collapse of structures.*

Rock and soil types were reviewed to determine if the Proposed Project Site could be subject to landslides. The Proposed Project Site is largely underlain by metamorphic and igneous rock, which is a hard rock type that typically is not subject to landslides. The underlying bedrock is jointed, but this feature does not significantly increase instability as evidenced by the stability of very steep on-site slopes despite slope movement. Although the soil types have erosion potential and some rock falls were evident on site, the soil profiles are relatively shallow, and there are no deep-seated landslides in the area; therefore, significant sliding or slumping is unlikely. There is some risk from 'popouts,' bedrock in steep areas that may become dislodged due to gravity. However, areas most likely to be affected are the steep canyons along the southern boundary which would be retained in open space. Landslide maps from the County of San Diego were examined and indicate that the Proposed Project is not located in an area of significant landslide danger. Analysis of the rock type, soil depths, and the review of the landslide maps indicate that there is no significant landslide danger on the Proposed Project Site. Guidelines 1 through 3 are not exceeded. Impacts are not significant and no mitigation is proposed.

#### Faulting

##### Guidelines for the Determination of Significance

The determination of impact significance for faulting is based on the following conditions that would be considered significant:

1. The project proposes any building or structure to be used for human occupancy over or within 50 feet of the trace of an Alquist-Priolo (A-P) fault or County Special Study Zone fault.



2. The project proposes the following uses within an AP Zone which are prohibited by the County:
  - a. Uses containing structures with a capacity of 300 people or more. Any use having the capacity to serve, house, entertain, or otherwise accommodate 300 or more persons at any one time.
  - b. Uses with the potential to severely damage the environment or cause major loss of life. Any use having the potential to severely damage the environment or cause major loss of life if destroyed, such as dams, reservoirs, petroleum storage facilities, and electrical power plants powered by nuclear reactors.
  - c. Specific civic uses. Police and fire stations, schools, hospitals, rest homes, nursing homes and emergency communication facilities.

### Analysis

*Guideline 1: The project proposes any building or structure to be used for human occupancy over or within 50 feet of the trace of an Alquist-Priolo (A-P) fault or County Special Study Zone fault.*

The Proposed Project Site is located approximately three miles west of the Elsinore Fault zone, which is one of the largest faults in southern California but is historically the least active, with the last major event having occurred in 1910 approximately 15 miles south of Riverside at a magnitude of 6.0. No other earthquakes as large as or greater than a magnitude of 6.0 have been recorded along this fault line. Since 1972, the State of California has delineated Special Studies Zones around active and potentially active faults in the State to prevent the construction of buildings used for human occupancy on the surface area near active faults. Since the Proposed Project Site is outside of the Special Study Area, seismicity should not be considered a significant constraint to project development. However, the Elsinore Fault is classified as active or potentially active. As an additional precaution, structure design should incorporate seismic safety measures. Guideline 1 is not exceeded and impacts are not significant. No mitigation is required.

*Guideline 2: The project proposes prohibited uses within an AP Zone which are prohibited by the County.*

The Proposed Project does not propose any of the listed uses and is not within an A-P zone; therefore, the guideline does not apply.

### Ground Shaking

#### Guidelines for the Determination of Significance

The determination of impact significance is based on the following condition that would be considered significant:

1. The project site is located within a County Near-Source Shaking Zone or within Seismic Zone 4 and the project does not conform to the Uniform Building Code.

### Analysis

*Guideline 1: The project site is located within a County Near-Source Shaking Zone or within Seismic Zone 4 and the project does not conform to the Uniform Building Code.*

All of San Diego County is located within Seismic Zone 4 and is subject to ground shaking. All habitable structures built within the Proposed Project Site would utilize the Universal Building Code's Seismic Hazards Standards for construction within a county Near-Source Seismic Shaking zone. Guideline 2 is not exceeded and impacts are not significant. No mitigation is necessary.

#### Liquefaction

##### Guidelines for the Determination of Significance

1. The project site has the potential to expose people or structures to substantial adverse effects because:
  - a. The project site has potentially liquefiable soils.
  - b. The potentially liquefiable soils are saturated or have the potential to become saturated.
  - c. In-situ soil densities are not sufficiently high to preclude liquefaction.

#### Analysis

*Guideline 1: The project site has the potential to expose people or structures to substantial adverse effects because of:*

- a. The project site has potentially liquefiable soils.
- b. The potentially liquefiable soils are saturated or have the potential to become saturated.
- c. In-situ soil densities are not sufficiently high to preclude liquefaction.

Liquefaction occurs primarily in saturated soils that are loose, and fine- to medium-grained, where the water table is 50 feet or less below the surface. When these soils shake during an earthquake, they can lose their solid characteristics and behave as a liquid. The Proposed Project Site is located outside of the County's mapped potential liquefaction areas. In addition, soil types on site are not consistent with potentially liquefiable soils. Guideline 1 is not exceeded and impacts are not significant. No mitigation is required.

#### Expansive Soils

##### Guidelines for the Determination of Significance

1. The project is located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), and does not conform to the Uniform Building Code.

#### Analysis

*Guideline 1: The project is located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), and does not conform to the Uniform Building Code.*

Expansive soils are clay soils that expand when wet and shrink when dry. Special construction precautions are required when developing in this type of soil. The

Proposed Project Site is not underlain by clay soils, and therefore this effect is not expected on the site. Guideline 1 is not exceeded and impacts are not significant. No mitigation is necessary.

#### **3.1.4.3 Cumulative Impact Analysis**

An approximately one-mile cumulative impact study area surrounding the site was defined, and encompasses the generally south-facing slopes of Volcan Mountain both east and west of Julian. A listing of past, present and future projects in the County's project data base was compiled. One project, TM4489, is a single family dwelling in Julian Estates, approximately two miles from the Proposed Project. The 'D' designator required review of geologic effects, among others, but no evidence of an unmitigated impacted was found. Cumulative impacts are not significant due to the lack of significant project level impacts, the separation between projects, and the limited scope of the projects involved. No mitigation is required.

#### **3.1.4.4 Significance of Impacts Prior to Mitigation**

There are no significant geologic impacts from the Proposed Project.

#### **3.1.4.5 Conclusion**

The Proposed Project was evaluated for geologic hazards by a registered civil engineer. A comprehensive range of effects were evaluated which includes cultural geology, landslides, faulting, ground shaking, liquefaction, and expansive soils. It was determined that the Proposed Project would not have significant effects in any of these areas due to the general stability of underlying bedrock and suitability of soils to uses anticipated for the site. Cumulative impacts were found to be not significant due to the limited scope of the Proposed Project and the single other project in the study area with a geological effect. No impacts are anticipated, and no mitigation is required.

### **3.1.5 Groundwater Resources**

The following section summarizes information from the groundwater analysis that was conducted for the Proposed Project prepared by Douglas Roff of AECOM. Mr. Roff is a County-approved consultant for the preparation of groundwater analyses. The report, entitled *Final Hydrogeologic Investigation, 1416.5- Acre Hoskings Ranch, Julian, San Diego County*, dated April 2012, is included as Appendix K of the [DEIR/FEIR](#).

#### **3.1.5.1 Existing Conditions**

The site consists of moderately steep, rocky slopes and rolling hills, which are vegetated with oak, sage brush, and grasses. Surrounding properties are relatively undeveloped with approximately 30 to 40 single-family homes within one-quarter mile of the property. Most of these homes are located along Pine Hills Road immediately southeast of the site. Approximately five to ten homes are located along both the northern and south-eastern portions of the study area on relatively large lots

that utilize groundwater for irrigation, potable needs, and the raising of cattle. Many homes in the study area are groundwater dependent. The Julian Water Company supplies potable water to about 276 acres of downtown Julian located northeast of the site. In addition, Pine Hills Mutual Water Company provides potable water to homes adjacent to the southern portion of the study area.

Apple and pear orchards are established on the lower hillsides and valley bottoms in the Julian area. Approximately 35 acres of orchards are located within one-quarter of a mile to the east and south property lines. Approximately 160 acres immediately north of the central portion of the property is used for cattle grazing.

Geology in the area consists of various types of granitic rock that compose fractured bedrock. The bedrock is overlain by residuum, or weathered rock, that varies in depth from non-existent to approximately 50 feet. Onsite elevations range from approximately 3,100 to 4,200 feet above mean sea level, with gradients ranging from gently sloping hills along the northeastern portion of the property to steep cliffs along the south central part of the property. Groundwater is found in both the bedrock and fractured alluvium, although fractured bedrock represents the significant water-bearing unit throughout the basin. The property is part of the larger Julian watershed, which includes over 12,000 acres. Groundwater within the 3,000-acre study area generally flows toward Orinoco/Temescal Canyon Creek, then westward, to exit the study area near the southwestern portion of the property where it merges with the San Diego River, continuing to flow southwesterly.

Fifteen wells are located on the Proposed Project Site. Well locations are shown in Figure 3-5-1, "Groundwater Study Area and Well Locations." Agricultural uses on the site have historically involved grazing in a non-irrigated setting.

### Regulatory Framework

This section gives a generalized summary of State and local regulations related to groundwater use.

#### *California Groundwater Rights*

The right to use groundwater in California has evolved through a series of court decisions dating back to the late 1800s.

Groundwater rights are not absolute, but pertain to the opportunity of use on the overlying land. This use must be "reasonable and beneficial". In 1903, a court ruling established that for landowners overlying an aquifer, each property had a "correlative" or co-equal right to a "just and fair proportion" of the resource (CDWR, 2003). These correlative rights only require that all property owners share equally in the resource until it is exhausted – irrespective of the consequences (WEF, 1998).

#### *California Environmental Quality Act (CEQA)*

Under the California Environmental Quality Act (CEQA), lead agencies are required to consider impacts to groundwater and water quality when considering discretionary actions. Appendix G of the State CEQA Guidelines lists two questions related to groundwater resources.

#### *San Diego County Groundwater Ordinance*

The County of San Diego currently manages anticipated future groundwater demand through the County Groundwater Ordinance. This Ordinance does not limit the number of wells nor the amount of groundwater extraction of existing landowners.



However, the Ordinance does identify specific measures to mitigate potential groundwater impacts of projects requiring specified discretionary permits. Existing land uses are not subject to the Ordinance unless a listed discretionary permit is required.

Section 67.722 (All Other Projects) regulates all areas within the County outside Borrego Valley and any future groundwater impacted basins. Specifically, single-family subdivision projects are required to conform to certain minimum parcel sizes. For other discretionary permit applications, the following findings must be made: 1) For projects using greater than 20 acre-feet per year or 20,000 gallons per day, that groundwater resources are adequate to meet the groundwater demands both of the project and the groundwater basin if the basin were developed to the maximum density and intensity permitted by the General Plan, and 2) for all other projects, that groundwater resources are adequate to meet the groundwater demands of the project.

In the case of certain subdivisions and Specific Plans, such as the subdivision proposed by the Hoskings Ranch project, well testing is required for approximately 10 percent of residential lots proposed (at least one well test and up to five well tests). Residential well tests must meet or exceed the following four requirements:

1. Well production during the residential well test must be maintained at a rate of no less than three gallons per minute;
2. The well test must be conducted for at least 24 hours, unless after eight hours of pumping, the measured specific capacity is equal to or greater than 0.5 gallons per minute per foot of drawdown, at which time pumping can be terminated;
3. The analysis of the Residential Well Test must indicate that no residual drawdown is projected (taking into account minor inaccuracies inherent in collecting and analyzing well test data); and
4. The analysis of the Residential Well Test must also indicate that the amount of drawdown predicted to occur in the well after five years of continual pumping at the rate of projected water demand, would not interfere with the continued production of sufficient water to meet the needs of the anticipated residential use(s).

If any well tested does not meet the above four requirements, the County may require additional well tests be conducted beyond the initial requirement of one to five well tests.

### **3.1.5.2 Analysis of Project Effects and Determination as to Significance**

The analysis included discussions with the San Diego County Groundwater Geologist, a site reconnaissance, questionnaires to neighbors, and review of geologic maps and literature and topographic maps. The report also included photographs of the area, evaluation of sustainable groundwater yield, coordination of pump testing of five production wells, a groundwater evaluation, and preparation of a report.

The groundwater study area covers approximately 3,000 acres, which includes the entire Proposed Project Site and the area one-quarter mile beyond the Proposed

Project Site on all sides. Existing and potential future groundwater use in the area is summarized in Table 3-5-1, "Anticipated Groundwater Needs at Maximum Buildout." As shown in Table 3-5-1, the anticipated groundwater needs at maximum buildout of the groundwater study area (per the General Plan) is 133 acre feet per year (afy). [This includes the 24 proposed residences.](#)

#### Groundwater Quality

AECOM personnel obtained groundwater samples from Wells A and B on September 18, 2008 and Well D on September 17, 2008 after at least two well-bore volumes had been pumped from the wells. The samples were collected and analyzed for gross alpha, uranium, total dissolved solids, nitrate, and total coliform.

No groundwater samples exceeded the maximum contaminant levels (MCLs) with the exception of total and fecal coliform in Well A and total and fecal coliform in Well D. These wells were disinfected, resampled, and found to be non-detect for total and fecal coliform. Further, water quality samples were collected from Well G on December 17, 2010 and Well E on January 12, 2011. None of these groundwater samples exceeded the MCLs.

#### Guidelines for the Determination of Significance

The guidelines to determine impacts to groundwater quantity were derived from the County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements, Groundwater Resources as follows:

1. Water Balance Analysis: For proposed projects in fractured rock basins, a soil moisture balance, or equivalent analysis, conducted using a minimum of 30 years of precipitation data, including drought periods, concludes at many time groundwater in storage is reduced to a level of 50% or less as a result of groundwater extraction; or
2. Offsite Well Interference: Offsite well interference would be considered a significant impact if after a five year projection of drawdown, the results indicate a decrease in water level of 20 feet or more in the offsite wells.
3. Low Well Yield:
  - a. Proposed projects requiring groundwater resources associated with single-family residences require well production during the well test to be not less than 3 gallons per minute (gpm) for each well tested. Proposed projects that cannot meet this requirement would be considered to have a significant impact.
  - b. Where analysis of a residential well test indicates that greater than 0.5 feet of residual drawdown is projected, the project would be considered to have a significant impact.
  - c. The analysis of the residential well test must indicate the amount of drawdown predicted to occur in the well after five years of continual pumping at the rate of projected water demand (a) would not interfere with the continued production of sufficient water to meet the needs of the anticipated residential use(s), and (b) must be less than the saturated depth of water above the pump intake or 100 feet, whichever is less. Proposed projects that cannot meet this guideline would be considered to have a significant impact.

### Analysis

*Guideline 1: For proposed projects in fractured rock basins, a soil moisture balance, or equivalent analysis, conducted using a minimum of 30 years of precipitation data, including drought periods, concludes at many time groundwater in storage is reduced to a level of 50% or less as a result of groundwater extraction.*

Guideline 1 was established to address the unique characteristics of the County fractured rock aquifers which are characterized by limited storage capacity and very limited groundwater recharge during droughts and excess recharge during wet periods. These unique characteristics typically cause large fluctuations of groundwater levels over the short-term which are generally not observed in aquifers with large storage capacity. During drought years, recharge may be negligible, and water extracted from the aquifer may be derived solely from storage. The available storage in the aquifer must be large enough to supply water throughout the duration of the drought. To assure sustainable groundwater use through drought conditions, the resulting calculated sustainable yield from the soil moisture balance analysis is a fraction of average annual recharge.

The soil moisture balance analysis involved calculating groundwater recharge within the 3,185-acre study area on a yearly basis from 1950 to 2000. Groundwater in storage was estimated using the typical storage capacity of the fractured bedrock and decomposed granite that underlay the site. The total calculated groundwater in storage in the study area was estimated to be 1,341.5 acre-feet.

A comparison was then made of yearly groundwater recharge and estimated groundwater extraction at the maximum buildout of the current General Plan. Depletion of groundwater in storage was calculated during years when groundwater extraction exceeded recharge. The amount of groundwater in storage was tracked annually through the 50 year period analyzed.

In the worst-case scenario of maximum buildout of the current General Plan, groundwater resources would be reduced to 59 percent of maximum groundwater in storage, which is above the 50 percent threshold. Therefore the Proposed Project as well as additional future homes at theoretical maximum buildout of the current General Plan could be implemented without affecting long-term sustainability of the groundwater supply. Guideline 1 is not exceeded and impacts to groundwater supplies are less than significant. No significant impact is anticipated due to Proposed Project implementation. No mitigation is required.

*Guideline 2: Offsite well interference would be considered a significant impact if after a five year projection of drawdown, the results indicate a decrease in water level of 20 feet or more in the offsite wells.*

Well interference reduces the well yield in affected wells by reducing the available drawdown in the well. The magnitude of well interference is dependent on the number and spacing of the wells, pumping rate, properties of the aquifer, and the duration over which pumping has occurred. The Proposed Project would employ a private domestic well on each of the 24 individual lots. The cumulative effect of these wells were analyzed together to predict potential impacts to offsite wells currently

being utilized by offsite well users. Standard hydrological methods were used to estimate drawdown using both an assumed production rate of 0.31 gpm for a period of five years, and a rate of 10 gpm for a period of 24 hours. The rate of 10 gpm for 24 hours is meant to represent drawdown resulting from a homeowner filling a 14,000-gallon swimming pool or similar use.

Offsite well interference was seven feet in the nearest offsite well, less than the threshold of 20 feet. Well interference projected in other offsite wells was less than that projected in the nearest offsite well. The number calculated conservatively assumes that no recharge occurs within the five year period, which would be similar to a severe drought scenario where little or no recharge would occur for five years. Guideline 2 is not exceeded and impacts to offsite groundwater users are less than significant. No significant impact is anticipated due to Proposed Project implementation. No mitigation is required.

*Guideline 3: Proposed projects requiring groundwater resources associated with single-family residences require well production during the well test to be not less than 3 gallons per minute (gpm) for each well tested. Proposed projects that cannot meet this requirement would be considered to have a significant impact. (ii) Where analysis of a residential well test indicates that greater than 0.5 feet of residual drawdown is projected, the Proposed Project would be considered to have a significant impact. (iii) The analysis of the residential well test must indicate the amount of drawdown predicted to occur in the well after five years of continual pumping at the rate of projected water demand (a) would not interfere with the continued production of sufficient water to meet the needs of the anticipated residential use(s), and (b) must be less than the saturated depth of water above the pump intake or 100 feet, whichever is less. Proposed projects that cannot meet this guideline would be considered to have a significant impact.*

Guideline 3 is divided into three separate thresholds to evaluate whether there is adequate well yield to meet the anticipated groundwater demand for the Proposed Project. For discretionary permit projects involving single-family residences, Section 67.722.C. of the County Groundwater Ordinance requires that at least three well tests be conducted for projects between 21 and 30 lots. The well tests must be capable of passing the well testing requirements set forth in Section 67.703 of the Ordinance of which the three thresholds in this guideline are based. The first threshold states that wells not capable of producing 3 gpm are considered significant. Typical single-family residences use approximately 0.5 acre-feet per year. This converts to 0.3 gpm if pumping occurred 24 hours a day, every day of the year. The required well yield has been set at a factor of 10 times higher than the average 0.3 gpm rate to meet the peak demands for a typical home resulting in the 3 gpm significance level for well yield. The second threshold for residual drawdown evaluates whether the well is within an aquifer of limited extent and long-term well yield may be lower than what is indicated in the well test. Residual drawdown is the difference between the initial water level before a well test is conducted and the water level after recovery. A consequential amount, set at 0.5 feet or greater of projected residual drawdown, would be indicative of an aquifer of limited extent and would be considered a significant impact. The third threshold is based on a five year projection of drawdown using standard hydrologic methods which takes into account the rate of projected demand for the proposed well. If after five years of continual pumping at the rate of projected demand, predicted drawdown must be less than the



saturated depth of water above the pump intake (the pump intake is assumed to be 50 feet above the bottom of the well) or 100 feet, whichever is less.

As part of the Hoskings Ranch groundwater investigation, eleven production wells were installed onsite for testing. Two additional wells were reported by the driller at the time the well was installed as being unable to produce the required 3 gpm. The results of well testing indicate that ten wells onsite may have adequate well yield, in accordance with County Groundwater Ordinance. Therefore, Guideline 3 is not exceeded and impacts due to low well yield are not significant. No significant impact is anticipated due to Proposed Project implementation. No mitigation is required.

### Groundwater Quality

#### Guidelines for the Determination of Significance

The following guideline 4.5 “Poor Groundwater Quality” from the County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements, Groundwater Resources calls for the analysis of possible effects to groundwater quality as a result of the proposed project:

1. Groundwater resources for proposed projects requiring a potable water source must not exceed the Primary State or Federal Maximum Contaminant Levels (MCLs) for applicable contaminants. Proposed projects that cannot demonstrate compliance with applicable MCLs would be considered to have a significant impact.

### Analysis

*Guideline 1: Groundwater resources for proposed projects requiring a potable water source must not exceed the Primary State or Federal Maximum Contaminant Levels (MCLs) for applicable contaminants. Proposed projects that cannot demonstrate compliance with applicable MCLs would be considered to have a significant impact.*

If groundwater in an area is not potable, any discussion of available groundwater resources is moot. Any groundwater that has contaminants that exceed the Federal or State primary MCLs is not potable. Therefore, any project dependent on this contaminated water does not have a viable source of water. In 2008, water samples were obtained from three wells: Well A, Well B and Well D. These wells were tested in a California-certified laboratory for gross alpha, uranium, total dissolved solids, nitrate, total coliform bacteria, and fecal coliform bacteria. Laboratory analytical methods and preservation methods, as well as lab results, are provided on Table 24 of Appendix K. Groundwater samples from Well A and Well D exceeded the MCL established for total and fecal coliform bacteria. These two wells were disinfected and resampled on July 1, 2010 and were found not to exceed the MCL for total and fecal coliform bacteria. Therefore, each of the three wells tested does not exceed MCLs for constituents analyzed. Guideline 1 is not exceeded. Impacts are not significant. No mitigation is required.

#### **3.1.5.3 Cumulative Impact Analysis**

As noted, a buildout estimate was made for the study area. The County of San Diego General Plan designates Julian, Hoskings Ranch and the surrounding one-quarter mile area as intensive agriculture where minimum allowable parcel sizes (4 and 8 acres) are based on slope and other criteria. Physical constraints such as steep

slopes and unfavorable conditions for septic systems in many areas preclude the creation of smaller parcels, particularly in the southern portion of the site. Consequently, a 20-acre parcel size was used in estimating maximum buildout for approximately 600 acres. One residence on 40 acres was assumed for private inholdings within the Cleveland National Forest, in conformance with the Forest Conservation Initiative. No residences were allocated to publically-owned land. A total of 216 homes could be located in the study area at maximum buildout, with a maximum annual extraction of 200 acre feet. This includes extraction for residences and agricultural uses. The lowest percent of maximum groundwater in storage is estimated to be 56 percent under the historic general plan. In accordance with the *County of San Diego Guidelines for Determining Significance, Groundwater Resources*, storage cannot drop below 50 percent (or 617 acre-feet) of maximum storage. Based on the groundwater in storage calculations, the study area could sustain development at maximum buildout under the current GP and the GP update.

Consequently the Proposed Project, in conjunction with buildout and estimated agricultural uses, would not exceed the sustainable yield calculated for the study area. Cumulative groundwater impacts under the theoretical current General Plan maximum buildout scenario are not significant and no mitigation is required.

#### **3.1.5.4     *Significance of Impacts Prior to Mitigation***

No significant effects would occur and no mitigation would be required.

#### **3.1.5.5     *Conclusion***

Groundwater resources were assessed by a County-listed consultant. The assessment included a review of the geology, soils, and groundwater characteristics of the site and surrounding area. A study area that includes a quarter mile around the site was defined. Groundwater demand for the site and the study area was calculated and overall storage and recharge was assessed. It was determined that adequate groundwater resources exist in the area to support the Proposed Project. Additionally, area buildout would not compromise groundwater availability.

Offsite well interference was evaluated on the basis of well tests. It was determined that the nearest offsite production well would experience 7 feet of drawdown after five years of cumulative effects of pumping from the 24 onsite production wells. Impacts are less than significant. No mitigation is required. The Proposed Project would be designed so that no well would be located within 300 feet of the Proposed Project boundary to ensure offsite interference does not occur.

Well yield was evaluated in eleven wells at the Proposed Project Site. As required by the County Groundwater Ordinance, ten of the wells met the Ordinance requirements and CEQA thresholds to evaluate low well yield. Impacts are not significant. No mitigation is required.

Groundwater quality tests conducted indicate no water quality standards were exceeded. Impacts are less than significant and no mitigation is required.

The Proposed Project was evaluated for potential contributions to cumulative impacts. Land within a one quarter mile radius of the Proposed Project Site was used for the cumulative analysis. Projected water usage in this area at build-out is below the sustainable yield for the study area. The Proposed Project does not contribute to cumulatively significant impacts. No mitigation is required.

### 3.1.6 Fire Hazard

A Fire Protection Plan (FPP) for the Hoskings Ranch 5312 RPL<sup>3</sup> project was prepared by Lamont Landis, a County-listed fire hazard consultant. The report is entitled, "Fire Protection Plan/Fuel Management Plan for 5312 RPL<sup>3</sup>, ER 03-10-005 Hoskings Ranch Project," dated February 10, 2013, and is provided as Appendix L of this ~~DEIR~~FEIR.

The purpose of the FPP is to assess the potential impacts resulting from wildland fire hazards and identify the measures necessary to adequately mitigate those impacts. As part of the assessment, the plan considers the property location, topography, geology, combustible vegetation (fuel types), climatic conditions, and fire history. The plan also addresses water supply, access, structural ignitability and fire resistive building features, fire protection systems and equipment, impacts to existing emergency services, defensible space, and vegetation management. The FPP identifies and prioritizes areas for hazardous fuel reduction treatments, and also recommends measures that property owners would take to reduce the probability of ignitions of structures throughout the area addressed by the plan.

#### 3.1.6.1 *Existing Conditions*

The Proposed Project is located in an area of San Diego County that is prone to wildfires due to its rural nature, the seasonal dry Santa Ana winds that promote the incidence and spread of wildfire, and the high flammability of the surrounding vegetation.

In 2003, the Cedar Wildfires burned through the Cleveland National Forest and in the nearby communities including Ramona, Lakeside, Alpine, Harbison Canyon, Cuyamaca Rancho State Park, Santa Ysabel, the community of Pine Hills directly to the south of the subject property, as well as parts of the subject property itself. The Cedar fires burned over 280,000 acres, and resulted in a total of at least 15 fatalities.

In 2007, the Witch Creek Fire, spread to the nearby communities of Ramona, Rancho Bernardo, Poway, and Escondido, and threatened to invade the communities of Santa Ysabel and Julian. In total, 197,990 acres burned, including 1,125 homes and two civilian fatalities, with a total estimated cost to the State of California of 16 million dollars.

#### On-Site Fire Conditions

Existing fire fuel loads on the project site are associated with vegetation and include non-native grasses about one-foot in height, Southern Mixed Chaparral and Diegan Coastal Sage Scrub (DCSS) approximately three feet in height as well as scattered trees.

#### Fire Protection Services

The project site is located within the services area of the Julian/Cuyamaca Fire Protection District (JCFPD). The nearest fire station to the project site is

Julian/Cuyamaca Fires Station No.56, located at 2645 Farmer Road in Julian. This station is staffed with two firefighters (two full-time paid on the ambulance and volunteers on the fire engine). Travel time to the project site from this station is approximately 9.1 to 9.3 minutes, depending on the route.

Additional fire protection service is from the CAL/FIRE Julian Station and Cuyamaca Station, which has automatic aid agreement with the JCFPD. The CAL/FIRE station is located at 587 Highway 78 and is staffed with three full-time firefighters. Travel time to the project site is approximately 11 minutes.

### Regulatory Framework

The regulations discussed below have been chosen for their applicability to the Proposed Project and for their usefulness in assessing potential adverse project impacts as defined by the California Environmental Quality Act (CEQA).

### Federal Regulations and Nationally Recognized Standards

#### *International Fire Code (IFC)*

Published by the International Code Council, it is a model code which may be adopted by a jurisdiction. It forms the basis for the current California Fire Code (California Code of Regulations (CCR) Title 24 part 9). The IFC is the underlying nationally recognized code that sets standards and requirements to safeguard against the threat fires may pose to public health, safety, and the environment. The IFC, when adopted by a jurisdiction, regulates the planning, construction and maintenance of development in all areas.

#### *National Fire Protection Association (NFPA) Standards*

The NFPA is a world-wide organization of fire industry, fire agencies, fire professionals and concerned individuals. These model standards are annually compiled from the standards, recommended practices, manuals, guides, and model laws that are prepared by the individual technical committees of the NFPA. Most are revised on a three-year cycle. The published standards are voted on by the members of the NFPA. The individual standards can be adopted by jurisdictions or modified and adopted as that jurisdiction's ordinance.

#### *California Environmental Quality Act and Guidelines*

Consideration of impacts relating to wildland fires is required by CEQA. The CEQA Guidelines are concerned with assessing impacts associated with exposing people or structures to wildland fires.

#### *California Building and Fire Codes*

Title 24 contains several International Codes that address fire safety regulations adopted by the California Building Standards Commission include the Uniform Mechanical Code, and Uniform Plumbing Code, which are also part of the California Code of Regulations.

### Local Regulations and Standards

#### *County of San Diego Building and Fire Codes*

Following the October 2003 and fall 2007 wildfires, in February 2008, the County amended the Fire Code and Building Code to include strengthened ignition-resistive construction requirements, modifying the previous two-tiered system and requiring "enhanced" standards for all new construction.

### *County Consolidated Fire Code*

County Consolidated Code (February 2012) is based on the County Fire Code and incorporates local fire district fire codes as ratified by the Board of Supervisors into a single document. The County Consolidated Fire Code includes notations where the local fire district(s) requirements differ from the County Fire Code. The County Consolidated Fire Code is the current fire regulation approved by the Board of Supervisors that apply in the various fire districts. The County Consolidated Fire Code has been certified by the California Board of Forestry and Fire Protection.

### *Memorandum of Understanding (MOU)*

The MOU is an agreement between the United States Fish and Wildlife Service (USFWS), California Department of Fish and Wildlife (CDFW), California Department of Forestry and Fire Protection (CAL FIRE), San Diego County Fire Chief's Association and the Fire District's Association of San Diego County.

The MOU was created to establish guidelines by which fire agencies can continue to require abatement of flammable vegetation without violating environmental regulations for the protection of habitats and species.

### *Combustible Vegetation and Other Flammable Materials Ordinance*

This ordinance addresses the accumulation of weeds, rubbish, and other materials on private property found to create a fire hazard and be injurious to the health, safety, and general welfare of the public. The ordinance finds that the presence of such weeds, rubbish, and other materials is a public nuisance, which must be abated in accordance with the provisions of this ordinance.

### *Local Fire Agencies' Ordinances*

Certain codes like the Fire Code can be amended to be more restrictive than state regulations based upon local climatic, geological and topographical features that can have a significant effect on fire protection and emergency services. These amendments are based on fire agencies' findings and local conditions within the County of San Diego. Per state law, local fire district fire code amendments are effective only after they are ratified or modified by the Board of Supervisors. Health and Safety Code, section 13869.7(a) and (c).

## **3.1.6.2 Analysis of Project Effects and Determination as to Significance**

### Guidelines for the Determination of Significance

The County of San Diego's *Guidelines for Determining Significance and Report Format and Content Requirements Wildland Fire and Fire Protection* provides a list of mandatory guidelines for the determination of significance. According to this list, the Proposed Project would have significant impacts if it:

1. Exposes 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.
2. Results in inadequate emergency access.
3. Results in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain



acceptable service ratios, response times or other performance objectives for fire protection.

4. Does not have sufficient water supplies available to serve the project from existing entitlements and resources, or new or necessary entitlement expansions.

#### Analysis

*Guideline 1: Exposes 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.*

#### Fire Behavior Modeling

The BehavePlus fire modeling system, was used to assess reasonably-anticipated conditions on the project site under worst-case scenarios during the summer and fall months as well as during Santa Ana wind conditions.

Vegetation types on the project site include non-native grasses, Southern Mixed Chaparral, DCSS and scattered trees. The fuel load for DCSS is approximately 3.6 tons per acre (RMRS-GTR-153 USDA Forest Service). The fuel load for non-native grasses less than one foot in height is 0.74 tons per acre.

The worst-case scenario conditions are analyzed in the FPP. The model results produced flame-lengths of approximately 12.7 feet in height for unmodified non-native grasses, 51.1 feet for unmodified DCSS and 56 feet for unmodified Southern Mixed Chaparral was 56 feet.

Using a safety margin of approximately two times the flame length, the fuel management zones for the Proposed Project should be a minimum of 100 feet. This would be accomplished through the use of a Limited Building Zone (LBZ), and two Fuel Management Zones, as described below.

#### Design Considerations

The Proposed Project has been designed to incorporate a 100-foot Limited Building Zone (LBZ) between open space and future development areas to maximize fire safety. The LBZ includes specific Fuel Management Zones (FMZs), as described below. Figure 3-6-1, "Typical Fire Clearing Design," shows the proposed zones overlain on a typical lot. Additional measures include construction standards that would improve fire-safety.

##### *Fuel Management Zone 1*

1. Fuel Management Zone 1 (FMZ1) consists of the first 50 feet surrounding habitable structures. Within FMZ1, native vegetation would be removed, and drought-tolerant and fire-resistant plant material would be planted and irrigated. The purpose of FMZ1 is to provide a defensible space for fire suppression forces to protect structures from radiant and convective heat during fire events. The following design measures are part of FMZ1: No combustible construction, groves, firewood, propane tanks, fuel or combustible native or ornamental vegetation shall be allowed within the 50 feet of this FMZ, or 30 feet of the edge of slopes.

2. Mature trees (above 18 feet in height) are to be limbed up or canopied six to eight feet from ground level.
3. No tree limbs are allowed within ten feet of chimney outlets, nor are any dead limbs allowed to overhang structures.
4. Spacing between mature tree canopies must be as follows:
  - a. Slopes 0 to 20 percent – 10 feet distant
  - b. Slopes 21 to 40 percent – 20 feet distant
  - c. Slopes greater than 40 percent – 30 feet distant
5. The minimum horizontal space between the edges of shrubs must be as follows:
  - a. Slopes 0 to 20 percent – two times the height of the shrub
  - b. Slopes 21 to 40 percent – four times the height of the shrub
  - c. Slopes greater than 40 percent – six times the height of the shrub
6. The minimum vertical space between the top of the shrub and the bottom of lower tree branches is three times the height of the shrub.
7. All plants used within FMZ1 must comply with the San Diego County Acceptable Plant List.
8. The landscaping plan for FMZ1 must be approved by the JCFPD.
9. FMZ1 shall be delineated with permanent markers (e.g., metal fence post with orange paint finish on the top half of the post) until such time it is no longer needed, as determined by the Fire Marshal.

#### *Fuel Management Zone 2*

Fuel Management Zone 2 (FMZ2) encompasses the area 50 feet beyond FMZ1, and bring the minimum width of the LBZ up to 100 feet. Landscaping plans for this area shall include methods of erosion control to protect against slope failure. The following design measures are part of FMZ2:

1. Fifty percent of the existing native combustible vegetation must be cleared in this area. Trees may remain provided that the horizontal distance between the crowns of trees is not less than ten feet.
2. Orchards, groves, and vineyards shall be maintained as per section 4707.3.2 of the San Diego County Consolidated Fire Code revised October 28, 2011.
3. Fire resistive plant materials are also required within FMZ2 to control soil erosion and/or to reduce vegetation mass near the wildland interface.
4. Plant spacing would be the same as noted for FMZ1.
5. All plants used within FMZ1 and FMZ2 must comply with the San Diego County Acceptable Plant List.
6. The landscaping plan for FMZ2 must be approved by the JCFPD.
7. FMZ2 shall be delineated with permanent markers (e.g., metal fence post with orange paint finish on the top half of the post) until such time it is no longer needed, as determined by the Fire Marshal.

### *Fuel Management Zone 3*

Fuel Management Zone 3 (FMZ3) focuses on roadside fuel modification and covers the area from the edge of the road or driveway to a width of 30 feet on each side of the road. The following design measures are part of FMZ3:

1. All vegetation must be maintained at a height of 4 to 6 inches with all dead and down vegetation removed.
2. Any plants within this area shall be from the San Diego County Acceptable Plant List and maintained per the requirements of FMZ1.
3. Any off-site fuel management along Daley Flat Road and Hoskings Ranch Road shall be pledged memorialized and attached to the parcels through a Private Road Maintenance agreement through the San Diego County Department of Public Works.
4. FMZ3 shall be delineated with permanent markers (e.g., metal fence post with orange paint finish on the top half of the post) until such time it is no longer needed, as determined by the Fire Marshal.

### Access

#### *Primary Access*

The Proposed Project's main access point is from Pine Hills Road along the eastern boundary at its intersection with Tenaya Road, which would be the new access road that originates in that location at Lot 7. Tenaya Road would be a two-lane road, 24 feet of pavement on a graded road bed of 28 feet, on a 40 foot easement that includes fire clearing.

#### *Secondary Access*

An additional access point is provided from Daley Flat Road north to Hoskings Ranch Road. Daley Flat Road north is a two-lane paved road, 24 feet in width on a 28-foot graded surface. The road is paved along its entire length, which from the Proposed Project's north-central boundary to SR 78/79 is 1.52 miles.

As per the FPP for the project, the following project design features would be implemented related to fire access road design:

- Dead end roads shall not exceed the 2,640 feet maximum allowable length.
- All new roads and driveways throughout the Proposed Project shall have a minimum clearance of 30 feet on either side and shall meet or exceed all San Diego County DPS and JCFPD requirements by complying with the San Diego County Consolidated Fire Code.
- Requirements include all-weather road surfaces suitable for travel by 50,000 lb. fire apparatuses.
- All driveways or roads exceeding 15 percent grade shall be surfaced in Portland cement concrete with deep broom finish perpendicular to the direction of travel to enhance traction.
- Roads shall not exceed 20 percent grade.
- All gates shall comply with section 503.6 of the San Diego County Consolidated Fire Code.

### Emergency Response Times

The Proposed Project within the services area of JCFPD. The nearest fire station to the project site is located at 2645 Farmer Road in Julian. Travel time to the project site from this station is approximately 9.1 to 9.3 minutes, depending on the route. This response time is within the 10-minute maximum travel time requirement and is consistent with the General Plan requirement for fire response.

Additional fire protection service is from the CAL/FIRE Julian Station and Cuyamaca Station, which has automatic aid agreement with the JCFPD. The CAL/FIRE station is located at 587 Highway 78 and is staffed with three full-time firefighters. Travel time to the project site is approximately 11 minutes. The Proposed Project is west of Julian and has 8-acre zoning that would be classified as a rural category. This allows for a 20 minute response time per the General Plan. Therefore, the Proposed Project can be served within in County-required response time.

~~Furthermore, the Proposed Project proposes the dedication of 5.0 acres of land along the northern boundary approximately one-half mile from the intersection of Pine Hills Road and SR 78/79 for the purpose of creating a new fire station. This area is provided as a public service and is not required as project mitigation for fire impacts. It would be able to serve the Proposed Project as well as the surrounding community.~~

### Construction Measures

A range of “fire safe” construction measures are proposed that control the materials, design, and safety systems used in the homes, as detailed in the technical report, Appendix L.

All new structures shall be equipped with the following interface features:

1. Roofs would be a Class “A” noncombustible material and shall meet San Diego County Planning and Development Services (DPS) standards.
2. Eaves and balconies would be on noncombustible material and meet San Diego County Building Code.
3. Exterior walls would be a noncombustible or ignition resistive material and meet the San Diego Building Code Chapter 7A.
4. All habitable structures and attached garages would be equipped with automatic fire sprinklers per the County Consolidated Fire Code requirements (NFPA-13D). All sprinkler systems shall be approved by the JCFPD prior to installation.
5. All future outbuildings must be approved by the JCFPD.
6. All structures would comply with the wildland area structural requirements of the San Diego Building Code Chapter 7A in affect at the time of a building permit application.

### Maintenance of Fuel Management Zones

FMZ1 and FMZ2 must be maintained in a manner that would fulfill the intent of the FPP and must meet the requirements of the JCFPD. Maintenance would include initial planting, weeding, irrigation installation, pruning, removal of dead and down vegetation, and the replacement of plants as the need arises.

Specific maintenance activities would include:

1. Each lot owner shall be responsible for all irrigation and landscaping FMZs within their property boundaries.
2. The JCFPD would hold each lot owner accountable for enforcement of all wildland fire protection issues discussed in the FPP.
3. Each lot owner shall not allow trash dumping or disposal of any yard trimmings in the FMZs.
4. The JCFPD or its designated representative shall decide any disputes related to individual lot landscaping or fuel treatment, with respect to interpretation of the FPP. Decisions shall be final and binding to the lot owner.
5. Should modifications to the Tentative Map occur, any and/or all of the FPP may be revised at the discretion of the JCFPD and the San Diego County Fire Marshal.
6. All exterior boundaries of FMZ1 and FMZ2 shall be permanently marked on the ground for purposes of guiding annual fuel maintenance and inspection operations. These markers must be spaced so that the markers to either side of any individual marker are visible.

These design measures would ensure the maximum fire protection possible for the residents of the Proposed Project and the surrounding community. Therefore, Guideline 1 is not exceeded and impacts are less than significant. No mitigation is necessary.

*Guideline 2: Results in inadequate emergency access.*

As described in the response to Guideline 1, above, the Proposed Project provides two access points for the 24 residential lots. Primary access is from Pine Hills Road along the eastern boundary at its intersection with Tenaya Road between Lots 5 and 7. Tenaya Road would be a two-lane road, 24 feet of pavement on a graded road bed of 28 feet, on a 40 foot easement that includes fire clearing.

Secondary access is provided from Daley Flat Road north to Hoskings Ranch Road. Daley Flat Road north is a two-lane paved road, 24 feet in width on a 28-foot graded surface. The road is paved along its entire length, which from the Proposed Project's north-central boundary to SR 78/79 is 1.52 miles. The Proposed Project applicant has legal access rights, as documented in the Title Report for the Proposed Project.

All roads within the Proposed Project meet the maximum dead-end allowance of 2,640 feet. All new roads and driveways throughout the Proposed Project shall have a minimum clearance of 30 feet on either side and shall meet or exceed all San Diego County DPS and JCFPD requirements by complying with the San Diego County Consolidated Fire Code. Requirements include all-weather road surfaces suitable for travel by 50,000 lb fire apparatuses; all driveways or roads exceeding 15 percent grade would be surfaced in Portland cement concrete with deep broom finish perpendicular to the direction of travel to enhance traction; no roads would exceed 20 percent grade; and all gates shall comply with section 503.6 of the San Diego County Consolidated Fire Code.

Since the project provides both primary and secondary emergency access and all roads and driveways proposed as part of the project meet San Diego County DPS, JCFPD and San Diego County Consolidated Fire Code requirements, Guideline 2 is not exceeded, and impacts are less than significant. No mitigation is required.



*Guideline 3: Results in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection.*

The Proposed Project as proposed would dedicate a portion of land for the creation of a new fire-service station, which would benefit the community as well as the Proposed Project itself. However, the station is not required as mitigation for the project. Guideline 3 is not exceeded, no impacts are anticipated, and no mitigation is required.

*Guideline 4: Does not have sufficient water supplies available to serve the project from existing entitlements and resources, or new or necessary entitlement expansions.*

The site is located in a groundwater-dependent area outside of the Municipal Water District (MWD), and therefore would be served by wells. The water for firefighting would come from onsite water tanks. Storage required for firefighting would comply with the conditions identified in Table 507.2.2 of the County Consolidated Fire Code. Each lot would be equipped with a water storage tank and a fire-hose connection which would meet with JCFPD requirements. As part of the current CEQA process, groundwater studies have been conducted which conclude that groundwater in the area is sufficient to serve the Proposed Project's needs. Guideline 4 is not exceeded and impacts are less than significant. No mitigation is required.

### **3.1.6.3 Cumulative Impact Analysis**

Cumulative research was conducted at the San Diego County Department of Planning and Development Services to discover any potential past, current, or future projects that may contribute to cumulatively significant impacts. The area in question was chosen based on historic information concerning the Cedar Fires, which burned areas that are topographically linked to the Proposed Project Site. This area includes Pine Hills and the hillsides adjacent to and below the Proposed Project site. All projects proposed for development in the County are required to conform to the San Diego County Consolidated Fire Code, as revised October 28, 2011. The Code includes substantial fire safety measures designed to minimize fire risk associated with development. When project conform to the San Diego County Consolidated Fire Code, they minimize their vulnerability and potential to contribute to fire risks.

The Proposed Project meets JCFPD requirements for fire protection, ~~and in addition contributes land to the district that could be used for the construction of an additional fire station, thereby contributing to an enhancement of fire safety in the area.~~ The Proposed Project conforms to the County's Consolidated Fire Code and local fire district fire safety requirements, including secondary access, cul de sac length, and fire safe construction measures. The Proposed Project, when considered with the other project in the area with a fire safety impact, does not have a cumulatively considerable impact. Guidelines are not exceeded. Impacts are not significant. No mitigation would be necessary.

### **3.1.6.4 Significance of Impacts Prior to Mitigation**

The Proposed Project design would require that two Fuel Management Zones surround each habitable structure (FMZ1 and FMZ2), adequate fire clearing be created along roadways (FMZ3), and fire-safe construction methods be employed.

These actions would prevent significant impacts to fire safety. No significant effects would occur and no mitigation would be required.

### 3.1.6.5 Conclusion

A fire analysis was completed by a County-listed fire hazard consultant. The analysis concluded that the Proposed Project, as designed, would have a less than significant impact on fire safety. No guidelines are exceeded and impacts for all guidelines are less than significant. The design measures described in the analysis portion of the FPP provide comprehensive measures for the prevention of fire hazards, including a two-tiered fire safety zone around habitable structures, fire clearing along roads, and fire-safe construction methods. The Proposed Project provides both a primary and a secondary access points. Impacts are less than significant and no mitigation is required.

### 3.1.7 Surface Water Resources

Surface water resources were evaluated in three reports: *CEQA Level Preliminary Drainage Study, Hoskings Ranch TM 5312RPL<sup>3</sup>*, dated March 13, 2013, *Major Stormwater Management Plan (Major SWMP), for Hoskings Ranch, Highway 78 and 79, Julian, San Diego County, California, TM 5312RPL3*, dated ~~January 5, 2014~~ March 13, 2013, both prepared by Masson & Associates, Inc., California-registered civil engineers; and *Technical Memorandum: Design of IMPs for Hydromodification and Water Quality Purposes for The Hoskings Ranch Development*, dated October 31, 2011, prepared by Tory R. Walker engineering, Inc. The studies are provided as Appendices M, N, and O, respectively, in the Technical Appendices.

#### 3.1.7.1 Existing Conditions

The Proposed Project is located in the central part of San Diego County, approximately one mile distant from the Julian town center. The property is bound to the north by SR 78/79 and to the east by Pine Hills Road. The site covers 1,416.5 acres of undeveloped land primarily containing natural and disturbed habitats.

The drainage area that affects the site covers approximately eight square miles and is divided into 12 major drainage basins. Two major drainage courses, Temescal Creek and Orinoco Creek, receive the discharge runoff from the basins and flow westerly to the San Diego River, which is the receiving water of the site. Basins 1 through 10 discharge directly into Temescal Creek; Basin 11 discharges into the San Diego River; and Basin 12 discharges into Orinoco Creek. All storm water runoff from the drainage eventually discharges into the San Diego River.

The topography of the site is generally sloping from east to south and west. Approximately 37.2 percent of the slopes onsite are over 25 percent slope. The hydrologic soils existing on the site are classified as types 'B' and 'C.' Type 'B' soils are primarily clay soils and have moderate infiltration rates when thoroughly whetted. Type 'C' soils have slow infiltration rates.

The general land use category for the site is (19) Intensive Agricultural. The zoning for the Proposed Project and surrounding area is A-72, General Agricultural.

#### Regulatory Framework – Surface Hydrology and Hydromodification

The following discussion details the most important Federal, State and local laws, regulations, policies and programs that address flooding issues onsite.

### Federal Regulations, Programs, and Acts

#### *Federal Regulations and Standards Federal Emergency Management Agency (FEMA)*

FEMA is the primary agency in charge of administering programs and coordinating with communities to establish effective flood plain management standards. FEMA is responsible for preparing FIRM for communities, which delineate both the areas of special flood hazards<sup>1</sup> and the risk premium zones applicable to the community.

#### *National Flood Insurance Act*

This legislation established the National Flood Insurance Program (NFIP). The 1968 Act provided for the availability of flood insurance within communities that were willing to adopt floodplain management programs to mitigate future flood losses. The act also required the identification of all floodplain areas within the United States and the establishment of flood-risk zones within those areas.

#### *National Flood Insurance Program*

This program is the Federal regulatory program under which flood-prone areas are identified and flood insurance is made available to residents of participating communities. The primary objectives of the National Flood Insurance Program (NFIP) were to: (1) make federal flood insurance available to home and business owners and renters who were exposed to flood hazards; and (2) as a condition of insurance availability, to require the adoption of specified hazard mitigation practices, including land use practices that restrict development on flood-prone lands.

#### *National Flood Insurance Reform Act*

The National Flood Insurance Reform Act was signed into law in 1994 and was designed to strengthen the NFIP by providing for mitigation insurance and establishing a grant program for State and community flood mitigation planning projects.

### State Regulations and Standards

#### *California Environmental Quality Act*

Under CEQA, lead agencies are required to consider impacts to hydrology and water quality. The State CEQA Guidelines recommend focusing on impacts that may result from: substantially altering drainage patterns; placing housing within a 100-year flood hazard area; placing structures within a 100-year flood hazard area; exposing people or structures to as a result of the failure of a dam; and exposing people or structures to inundation by a seiche, tsunami, or mudflow.

#### *Cobey-Alquist Flood Plain Management Act*

This act encourages local governments to plan, adopt and enforce land use regulations for floodplain management in order to protect people and property from flooding hazards. This act also identifies requirements that jurisdictions must meet in order to receive state financial assistance for flood control.

### Local Regulations and Standards

#### *San Diego County General Plan, Public Safety Element (Part VII)*

The Public Safety Element was developed to introduce safety considerations into the planning and decision making processes in order to reduce the risk of injury, loss of life, and property damage associated with the hazards identified in the element. The element also proposes policies and recommendations aimed at enhancing public safety through prevention as well as response preparation. Chapter 3 of the element, Geologic Hazards, addresses non-seismic hazards, specifically slope instability/erosion and landslides, which can cause flooding.

#### *San Diego County General Plan, Seismic Safety Element (Part V)*

In 1984, the Government Code (§ 65302g) was amended to require that the Seismic Safety Element be consolidated with the Public Safety Element. The Seismic Safety Element is an update to the seismic safety portion of the Safety Element and has the following objectives: define degrees of risk in various parts of the County; minimize risk to human life from structures located in hazardous areas; provide a basis for designating land uses in risk areas; ensure essential facilities would operate in the event of a disaster; facilitate post-disaster relief and recovery operations; and increase public awareness of hazards. Section 6 addresses and provides policies on landslides, Section 8 addresses and provides policies on tsunamis and seiches and Section 9 addresses and provides policies on inundation caused by dam failure.

#### *San Diego County General Plan, Conservation Element (Part X)*

The Conservation Element identifies and describes the natural resources of the County of San Diego and includes policies and action programs to conserve those resources. Chapter 3, Water, Finding 21 under Drainage and Flood Control, addresses the effects of land use changes on the hydrology of an area, including changes in peak flow characteristics (floods), changes in total run-off, changes in the quality of water, and changes in the appearance of the area.

#### *County of San Diego Flood Damage Prevention Ordinance*

This ordinance was established to promote the public health, safety, and general welfare, and to minimize public and private losses due to flood conditions in specific areas throughout the County of San Diego. Pursuant to this ordinance, SFHA in the County are identified as areas having a special flood or flood-related erosion /sedimentation hazard and shown on a FIRM, on a County flood plain map as within 100-year flood plain or on an alluvial fan map within an alluvial fan area. This ordinance defines methods to accomplish the goals of reducing flood losses, including: restricting uses which are dangerous to health, safety and property due to erosion or water hazards; requiring uses vulnerable to floods to be protected against flood damage at the time of construction; controlling the alteration of natural flood plains; controlling filling, grading, or dredging which may increase flood damage; and preventing construction of flood barriers which would divert flood waters or increase flood hazards in other areas. This ordinance also provides for provisions for standards of construction and standards for subdivisions in areas of special flood hazards. By complying with the requirements of the Flood Damage Prevention Ordinance, projects are considered to be in compliance with FEMA regulations.

#### *County of San Diego Resource Protection Ordinance (RPO)*

The RPO prohibits development of permanent structures for human habitation or as a place of work in a floodway. Uses permitted in a floodway pursuant to Article IV, Section 3 of this ordinance include agricultural, recreational, and other such low intensity uses, provided, however, that no use shall be permitted which would substantially harm the environmental values of a particular floodway area.

*County of San Diego Grading Ordinance*

The revised Grading Ordinance was adopted by the Board of Supervisors and became effective on April 23, 2004. The purpose of the ordinance is to combine regulations affecting the grading and clearing of land, and activities affecting watercourses, within the unincorporated County of San Diego. Chapter 6 (Section § 87.601- 87.608) of the ordinance covers watercourses and is intended to protect persons and property against flood hazards by identifying prohibited acts in watercourses and acts prohibited unless a permit is obtained.

*County of San Diego Watershed Protection Ordinance, Storm Water Management and Discharge Control Ordinance (WPO and SSM)*

The WPO and SSM were amended January 10, 2003 (Ordinance No. 9518) and August 5, 2003 (Ordinance No. 9589), and revised December 2010. The stated purposes of these ordinances are to protect the health, safety and general welfare of the County of San Diego residents; to protect water resources and to improve water quality; to cause the use of management practices by the County and its citizens that would reduce the adverse effects of polluted runoff discharges on waters of the state; to secure benefits from the use of stormwater as a resource; and to ensure the County is compliant with applicable state and federal law. The WPO contains discharge prohibitions, and requirements that vary depending on type of land use activity and location in the County. The SSM is Appendix A of the WPO and sets out in more detail, by project category, what Dischargers must do to comply with the WPO and to receive permits for projects and activities that are subject to the WPO. The WPO and SSM define the requirements that are legally enforceable by the County in the unincorporated area of San Diego County.

*County of San Diego Hydrology Manual*

This manual provides technical guidance and mapping resources for the analysis of hydrology conditions such as soil types.

*Board of Supervisors Policy I-45: Definition of Watercourses in the County of San Diego Subject to Flood Control*

The purpose of this policy is to define those watercourses in the County of San Diego that are subject to flood control so that appropriate responsibility can be determined. Flood control is defined as those watercourses which serve one square mile or more of watershed shown on the map on file with the Clerk of the Board as Document #468904.

*Board of Supervisors Policy I-68: Proposed Projects in Flood Plains with Defined Floodways*

This policy was developed to identify procedures to be used when proposed projects impact floodways as defined on County floodplain maps. The policy defines procedures to be implemented for the following types of proposals: major construction that would change the flood plain or floodway; relocation of a floodway;



partial filling of the flood plain fringe; erosion and sedimentation in a flood plain; increased flood flows; and concrete or rip rap facilities.

*Board of Supervisors Policy I-73: Hillside Development Policy*

The purpose of this policy is to minimize the effects of disturbing natural terrain and to provide for creative design for hillside developments. It provides policies designed to minimize the permanent impact upon site resources including but not limited to existing natural terrain, established vegetation, visually significant geologic displays and portions of a site that have significant public or multiple-use value. Specifically, Policy 1.e requires planning of hillside developments to minimize potential soil, geological and drainage problems.

*County of San Diego Final Hydromodification Plan (March 25, 2011)*

The plan provides technical data such as sizing tables for the completion of project specific hydromodification analyses.

*County of San Diego Standard Urban Stormwater Mitigation Plan for Land Development and Public Improvement Projects (SUSMP)*

The plan is intended to help implement part of the County's Stormwater Program. The SUSMP addresses land development and capital improvement projects. It is focused on project design requirements and related post-construction requirements, but not on the construction process itself.

Regulatory Framework – Water Quality

Federal Regulations

*The Clean Water Act (CWA)*

The CWA was passed by Congress in 1972 and was extended to stormwater concerns in 1990; thus making it illegal to release pollutants into waterways. The Regional Water Quality Control Board (RWQCB), a division of the State of California Environmental Protection Agency, is responsible for ensuring that federal and state water regulations are implemented at the local level.

State Regulations and Standards

*Municipal Stormwater Permit*

The California RWQCB requires all local jurisdictions to implement a stormwater program to address stormwater concerns, permitting San Diego County jurisdictions to discharge stormwater runoff via storm drains into natural water bodies. Requirements under the permit mandate that the jurisdictions regulate development and existing establishments to comply with stormwater requirements.

The Permit is a product of the CWA. On January 24, 2007, the RWQCB adopted a revised Municipal Stormwater Permit (Order No. R9-2007-0001) [4]. The revised Permit intends to further reduce the pollution that runs down storm drains into local waterways. As of 2010, the County and other local jurisdictions have an updated stormwater program with a comprehensive list of Best Management Practices (BMPs), including the new LID standards and criteria.

Local Regulations and Standards

*County of San Diego Watershed Protection, Storm Water Management, and Discharge Ordinance (WPO)*

This ordinance requires all applications for a permit or approval associated with a Land Disturbance activity to be accompanied by a Storm Water Management Plan (SWMP). The purpose of a SWMP is to describe how the project would minimize the short and long-term impacts on receiving water quality.

### **3.1.7.2 Analysis of Project Effects and Determination as to Significance**

The analysis of Proposed Project effects to surface hydrology and water quality is discussed from two perspectives; the first considers effects to drainage, flooding and runoff, and the second considers effects to water quality.

#### Surface Hydrology

#### Guidelines for the Determination of Significance

The guidelines to determine impacts to surface hydrology were derived from the County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements, Hydrology as follows:

1. The project would 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.
2. The project would increase water surface elevation in a watercourse within a watershed equal or greater than 1 square mile, by 1 foot or more in height and in the case of San Luis Rey River, San Dieguito River, San Diego River, Sweetwater River and Otay River, 2/10 of a foot or more in height.
3. The project would result in increased velocities and peak flow rates exiting the project site that would cause flooding downstream or exceed the storm water drainage system capacity serving the site.
4. The project would result in placing housing, habitable structures, or unanchored impediments to flow in a 100-year floodplain area or other special flood hazard area, as shown on a FIRM, a County Flood Plain Map or County Alluvial Fan Map, which would subsequently endanger health, safety and property due to flooding.
5. The project would place structures within a 100-year flood hazard or after the floodway in a manner that would redirect or impede flow resulting in any of the following:
  - a. Alter the Lines of Inundation resulting in the placement of other housing in a 100-year hazard; or
  - b. Increase water surface elevation in a watercourse with a watershed equal to or greater than 1 square mile by 1 foot or more in height and in the case of the San Luis Rey River, San Dieguito River, San Diego River, Sweetwater River and Otay River 2/10 of a foot or more in height.

#### Analysis

*Guideline 1: The project would 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.*

The Proposed Project's 24 lots range in size from 40 acres to 196 acres and are designed to minimize disturbance of existing topography by using double driveways where feasible and situating pads in areas requiring minimal grading. The roads and pads would follow the existing terrain to minimize the need for cut and fill. Total grading would amount to approximately 103,568 cubic yards (cy) of fill, an 103,127 cy of cut. The grading would be balanced on site in final engineering. With this minimal level of grading, drainage flow would be maintained in existing swales and minimal flows would be carried within the proposed streets.

The basin area is delineated in Exhibit A of the Drainage Study (Appendix M), which details the location of the drainage basins, flowage paths and concentration points for the pre-development conditions. Exhibit B of Appendix M, post-development conditions, adds the proposed development grading and proposed culverts. A comparison of the two conditions shows that the Proposed Project would not increase the amount of water leaving the project site. Substantial erosion or siltation on- of off-site would not occur because drainage patterns are maintained. In the hydromodification analysis (Appendix O), 32 contributing areas are identified in the pre- and post-development conditions. Bio-retention cells have been designed for each area, as detailed in Appendix 1 (mapping) and Appendix 2 (calculations) of the hydromodification memorandum. The designs satisfy both hydromodification and water quality requirements. Bio-retention cells were chosen as the best Integrated Management Practice (IMP) option because they are one of the preferred treatment facilities in the Guideline 1 is not exceeded and short- and long-term impacts are not significant. No mitigation is required.

*Guideline 2: The drainage study examines whether project would increase water surface elevation in the San Diego River watershed by 2/10 of a foot or more.*

Hydrology calculations for the pre- and post-development condition are located in Appendices B and C, respectively, of the drainage study (Appendix M). The overall drainage basins include a large offsite area and 49.5 acres of pad and road grading would have little or no effect on post-development runoff in terms of raising the water surface elevation of the San Diego River, and therefore the Proposed Project is not expected to cause any adverse effects to downstream drainage facilities. No development would take place offsite, therefore no impacts are anticipated. Guideline 2 is not exceeded. No short- or long-term effects would occur. Impacts are not significant and no mitigation is required.

*Guideline 3: The project would result in increased velocities and peak flow rates exiting the project site that would cause flooding downstream or exceed the storm water drainage system capacity serving the site.*

The coefficients of runoff were derived from the County of San Diego Hydrologic Soil Classification Map (See Appendix M). The difference in runoff coefficients before and after development is insignificant because the Proposed Project would only disturb approximately 3.5 percent of the site. Velocity of water leaving the site would not be altered either in the short- or long-term. Guideline 3 is not exceeded and impacts are not significant. No mitigation is proposed.

Rainfall intensity for the Proposed Project was derived from the County Drainage Manual using the 100-year 6-hour and 100-year 24-hour maps. In combination with the factors of basin area and coefficients of runoff, the time of concentration (toc) was calculated. The toc is defined as the time required for the runoff to flow from the most remote part of the drainage basin to an identified concentration point. The toc

for the pre-development conditions were evaluated as a natural watershed. The toe for post-development is going to remain approximately the same for all basins because so much of the natural drainage basin would remain undisturbed. Guideline 3 is not exceeded and impacts are not significant. No mitigation is required.

Rainfall intensity associated with the 100-year storm was used to calculate the peak runoff from the drainage basins. The offsite area included in the overall drainage basins is large enough that the minimal grading required for the development of the Proposed Project would not add significant area of impervious surface. The post-development runoff conditions would not be significantly different from the pre-construction conditions. Therefore, anticipated Proposed Project effects to existing drainage velocities and flow rates do not exceed Guideline 3. Impacts are not significant in the short- and long-term. No mitigation is required.

The Drainage Study (Appendix M) also analyzed existing culverts crossing Pine Hills Road. These were found to be insufficient and would therefore be augmented so as to adequately receive the 100-year flow as a part of the Proposed Project's design. Proposed culverts, inlets and brow ditches have been appropriately sized to accept the 100-year flow. Since all peak flows exiting the Proposed Project Site would be equal to those of the existing conditions, there would be no adverse effects on downstream drainage facilities. Guideline 3 is not exceeded. Proposed Project impacts to the capacity of existing or planned storm water drainage systems are less than significant in both the short- and long-term. No mitigation is proposed.

*Guideline 4: The project would result in placing housing, habitable structures, or unanchored impediments to flow in a 100-year floodplain area or other special flood hazard area, as shown on a FIRM, a County Flood Plain Map or County Alluvial Fan Map, which would subsequently endanger health, safety and property due to flooding.*

The Proposed Project does not propose housing, habitable structures or unanchored impediments to flow in a 100-year floodplain area or other special flood hazard area. Floodplains are located in deeply incised water courses that do not have broad floodplains or are located in remote areas where no development is proposed. Guideline 4 is not exceeded and short- and long-term impacts are not significant. No mitigation is required.

*Guideline 5: The project would place structures within a 100-year flood hazard or alter the floodway in a manner that would redirect or impede flow resulting in any of the following:*

- a. Alter the Lines of Inundation resulting in the placement of other housing in a 100-year hazard; or
- b. Increase water surface elevation in a watercourse with a watershed equal to or greater than 1 square mile by 1 foot or more in height and in the case of the San Luis Rey River, San Dieguito River, San Diego River, Sweetwater River and Otay River 2/10 of a foot or more in height.

The Proposed Project does not propose to place structures within a 100-year flood hazard or alter the floodway in a manner that would redirect or impede flow. Crossings would be sized to accommodate 100-year flood events. Guideline 5 is not exceeded and short- and long-term impacts are not significant. No mitigation is required.

## Water Quality

### Guidelines for the Determination of Significance

The Proposed Project would have a significant effect on water quality if:

1. The project would drain to a tributary of a drinking water reservoir and would contribute substantially more pollutant(s) than would normally runoff from the project site under natural conditions,
2. The project would contribute pollution in excess of that allowed by applicable State or local water quality objectives or would cause or contribute to the degradation of beneficial uses,
3. The project does not conform to applicable Federal, State or local "Clean Water" statutes or regulations including but not limited to the Federal Water Pollution Control Act, California Porter-Cologne Water Quality Control Act, and the County of San Diego Watershed Protection, Stormwater Management, and Discharge Control Ordinance.
4. The project would drain to a tributary of an impaired water body listed on the Clean Water Act Section 303(d) list, and would contribute substantial additional pollutant(s) for which the receiving water body is already impaired,
5. Or, it is a development project listed in County of San Diego, Code of Regulatory Ordinances (Regulatory Ordinances), Section 67.804(g), as amended and does not comply with the standards set forth in the County Stormwater Standards Manual, Regulatory Ordinances Section 67.813, as amended, or the Additional Requirements for Land Disturbance Activities set forth in Regulatory Ordinances, Section 67.

### Analysis

*Guideline 6: The project would drain to a tributary of a drinking water reservoir and would contribute substantially more pollutant(s) than would normally runoff from the project site under natural conditions.*

El Capitan Reservoir is 12 miles downstream from the Proposed Project Site and is listed as "Impaired" on the most recent list of 303(d) limited segments requiring Total Maximum Daily Loads (TMDLs).

Beneficial uses for El Capitan Reservoir (for reservoirs and lakes as listed in the San Diego Basin Plan) include:

- a) Municipal and Domestic Supply (MUN)
- b) Agricultural Supply (AGR)
- c) Industrial Process Supply (PROC)
- d) Industrial Service Supply (IND)
- e) Contact Water Recreation (REC-1)



- f) Non-contact Water Recreation (REC-2)
- g) Warm Freshwater Habitat (WARM)
- h) Cold Freshwater Habitat (COLD)
- i) Wildlife Habitat (WILD)
- j) Rare, Threatened, or Endangered Species (RARE)

There would be no impacts receiving waters beneficial uses. Any permitting requires the development of a project-specific Stormwater Management Plan (SWMP) and a hydromodification analysis and retention design. The SWMP needs to specifically follow the County's SUSMP and hydromodification criteria which addresses LID and post project treatment control BMPs to target pollutants of concern.

BMP controls would be a combination of site design, source control and LID, as well as Treatment Controls for each house pad. Streets would utilize vegetated bio retention techniques with minimum travel or residence time of 10 minutes to treat street runoff.

Any increase in flows and volumes would be mitigated through the use of detention basins and LID practices for hydromodification controls.

The Proposed Project does not drain to a tributary of a drinking-water reservoir. Guideline 6 is not exceeded and impacts are not significant. No mitigation is necessary.

*Guideline 7: The project would contribute pollution in excess of that allowed by applicable State or local water quality objectives or would cause or contribute to the degradation of beneficial uses.*

Onsite (or within close proximity) receiving waters include Setenec Creek, Temescal Creek, and Orinoco Creek. The Beneficial Uses for these creeks include:

- a) Municipal and Domestic Supply (MUN)
- b) Agricultural Supply (AGR)
- c) Industrial Process Supply (PROC)
- d) Industrial Service Supply (IND)
- e) Contact Water Recreation (REC-1)
- f) Non-contact Water Recreation (REC-2)
- g) Warm Freshwater Habitat (WARM)
- h) Cold Freshwater Habitat (COLD)
- i) Wildlife Habitat (WILD)
- j) Rare, Threatened, or Endangered Species (RARE)

The San Diego River is approximately 2 miles downstream from the western boundary of the site. The Beneficial Uses listed in the San Diego Basin Plan are the same as those listed above.

Design measures to control runoff quantity and quality have been described in the SWMP. BMPs for the proposed roads would be bio retention techniques with a minimum 10 minute residence time and 2 bio-retention/detention facilities. Each pad

would incorporate LID design strategies as required by the County's SUSMP. These strategies would be specifically identified and designed with the development of grading and improvement plants.

The Proposed Project has been designed so that it would not contribute to pollution in excess of allowed standards. Road improvements have been aligned to avoid or minimize impacts to receiving waters. Erosion effects are minimized by the collection of concentrated flows in stabilized drains and channels. Low Impact Development (LID) standards are implemented which include preserving large open space areas and minimizing disturbances to natural drainages. Curb cuts to natural vegetation and rural bio retention techniques are used. 'Hardening' downstream areas to prevent erosion would not be required due to the lack of significant erosion effects. Source control BMPs would be implemented that include labeling of storm drain outlets and signage that indicates dumping is prohibited. Shared access driveways are used to reduce graded area. Brow ditches would be used to control runoff from impervious surfaces, and storage areas would be paved. Design measures implemented under County of San Diego requirements would effectively control pollutants because they would control, collect, and filter flows prior to their contact with natural vegetation. Guideline 7 is not exceeded and short- and long-term impacts are not significant. No mitigation is required.

*Guideline 8: The project does not conform to applicable Federal, State or local "Clean Water" statutes or regulations including but not limited to the Federal Water Pollution Control Act, California Porter-Cologne Water Quality Control Act, and the County of San Diego Watershed Protection, Stormwater Management, and Discharge Control Ordinance.*

The Proposed Project conforms to the listed statutes and regulations. A stormwater management plan was prepared for the Proposed Project which documents conformance with statutes or regulations. Guideline 8 is not exceeded and short- and long-term impacts are not significant. No mitigation is required.

*Guideline 9: The project would drain to a tributary of an impaired water body listed on the Clean Water Act Section 303(d) list, and would contribute substantial additional pollutant(s) for which the receiving water body is already impaired.*

El Capitan Reservoir, which is approximately 12 miles downstream from the Proposed Project Site, is the only receiving water listed on the 303(d) list. The impairments include Color, Manganese, and pH. The County's SUSMP requires treatment BMPs to have a minimum effectiveness of medium as described in Table 2-3 of the County's SUSMP for the targeted constituents. The Proposed Project would incorporate, at a minimum, bio-retention facilities which provide medium to high effectiveness in removing the targeted constituents.

Changes to the SWMP would be made as necessary and as warranted to address any changes in circumstances as the Proposed Project moves into final engineering and construction. Construction permits would not be issued until the County approves all treatments. At this time, it is difficult to identify the exact treatment BMPs that would work for a specific situation. If additional or other BMPs are necessary during the design phase, they would be incorporated into the Proposed Project with approvals from the County.

The Proposed Project does not contribute to an impaired body of water on the Clean Water Act Section 303(d) list. Guideline 9 is not exceeded and impacts are not significant. No mitigation is required.

*Guideline 10: The project is a development project listed in County of San Diego, Code of Regulatory Ordinances (Regulatory Ordinances), Section 67.804(g), as amended and does not comply with the standards set forth in the County Stormwater Standards Manual, Regulatory Ordinances Section 67.813, as amended, or the Additional Requirements for Land Disturbance Activities set forth in Regulatory Ordinances, Section 67.*

The Proposed Project is not listed in these ordinances and therefore has no short- or long-term impact under the sections cited. Impacts are not significant. Guideline 4 is not exceeded and no impacts occur. No mitigation is required.

### **3.1.7.3 Cumulative Impacts Analysis**

Ninety past, present, or future projects were examined in the cumulative impact study area. The study area encompasses the basin in which the Proposed Project is located, as well as the nearby communities of Pine Hills and Julian, which ultimately contribute to the San Diego River watershed. Projects currently processed in by the County of San Diego are required to complete stormwater management plans that would control polluted runoff. Additionally, three projects in the study area were noted as having potential drainage impacts. These are SP 03-015 (Leroux), SP 02-029 (Behen), and TPM 20863. Both SP 03-015 and SP 02-029 are limited in scale and fully mitigate impacts by adopting appropriate pollution control measures and conforming to County of San Diego requirements for controlling surface water flow and quality. Both of the active projects are single-family residences and would expect to have pollutants similar to the Proposed Project, but at a small scale. TPM 20863 has been withdrawn.

Potential source of runoff pollutants are discussed in the SWMP report, pages 10-12 and include on-site storm drain inlets, landscape/outdoor pesticide use, fire sprinkler test water, and roofing, gutters and trim.

In order to maintain beneficial uses, the Proposed Project would implement temporary construction BMPs, LID and site design strategies and permanent source control BMPs such as marking all inlets with the "No Dumping! Flows to Bay" or similar, preserving existing native vegetation, minimizing irrigation and runoff, and proper plant selection, and drain fire sprinkler test water to the sanitary sewer. Operational source control BMPs would entail maintaining and periodically repainting or replacing inlet markings, avoiding the use of pesticides and providing IPM information to owners, and avoiding roofing, gutters and trim made of copper or other unprotected metals that may leach into runoff.

Due to the limited impacts of cumulative projects, and their dispersed locations within the study area, cumulative impacts are not significant and no mitigation is required.

### **3.1.7.4 Significance of Impacts Prior to Mitigation**

There are no significant impacts to drainage or water quality. No mitigation is required.

### **3.1.7.5 Conclusion**

Drainage and stormwater runoff were evaluated for the Proposed Project by a licensed engineering firm. It was determined that Proposed Project design features avoid significant impacts. These design considerations include minimizing grading, a 40-acre minimum lot size, and retention of [4,209.81,214.8](#) acres in their natural state. Velocity and volume of drainage in pre- and post-development conditions were found to be substantially the same. Short- and long-term drainage impacts were found to be not significant and no mitigation is required.

Water quality effects were also analyzed and it was determined that adoption of selected BMPs would limit and control polluted runoff because purifying mechanisms would be put in place to filter out pollutants before they can reach receiving waters. These mechanisms include collecting concentrated flows in stabilized drain systems, adopting LID measures, and using source controls such as signage to deter dumping. Short- and long term water quality impacts were found to be not significant and no mitigation is required.

Cumulative impacts were evaluated. Three other projects in the study area have potential drainage impacts which were addressed at the project level. Due to the minor scope of these projects in relation to the basin, use of drainage and stormwater plans to control their runoff, and their dispersed nature, cumulative impacts were found to be not significant and no mitigation is required.

### 3.1.8 Noise

A Noise Study of the Hoskings Ranch TM54322 Project Site was conducted by Jeremy Loudon, who is on the County's CEQA Consultant List approved for the preparation of acoustical studies. The resulting report, *Preliminary Noise Study, Hoskings Ranch Subdivision TM5312 RPL2*, is dated ~~February 21, 2014~~[September 24, 2015](#). The study is provided as Appendix P in the Technical Appendices of this ~~DEIR~~[FEIR](#).

#### 3.1.8.1 Existing Conditions

The Proposed Project Site is located in the central part of San Diego County, south of State Route 78 (SR-78) and west of Pine Hills Road near Julian.

The Proposed Project proposes an agricultural subdivision that would create 24 lots of 40-acre minimum lot size. Open Space for the protection of sensitive biological and cultural resources is proposed. If homes are built on the site, they would be developed on an individual lot basis. For purposes of this report, it is conservatively assumed that the site would be constructed with the 24 rural estates which would be the on-site noise sensitive land uses (NSLU). The site plan for the Proposed Project is shown in Figure 1-1.

The Proposed Project is located adjacent to SR-78 and Pine Hills Road; both of which are light collector roadways in the County of San Diego's Circulation Element. Existing noise occurs mainly from traffic traveling along SR-78 and to a lesser extent from Pine Hills Road.

#### Regulatory Framework

The following summarizes the salient aspects of the state and local regulations that apply to the Proposed Project.

#### State Regulations and Standards

*California Environmental Quality Act (CEQA)*

The California Environmental Quality Act (CEQA) requires lead agencies to consider noise impacts. Under CEQA, lead agencies are directed to assess conformance to locally established noise standards or other agencies' noise standards; measure and identify the potentially significant exposure of people to or generation of excessive ground borne vibration or noise levels; measure and identify potentially significant permanent or temporary increases in ambient noise levels; and measure and identify potentially significant impacts associated with air traffic.

#### *California Noise Control Act*

The California Noise Control Act declares that the State of California has a responsibility to protect the health and welfare of its citizens by the control, prevention, and abatement of noise. It is the policy of the State to provide an environment for all Californians free from noise that jeopardizes their health or welfare.

#### *California Noise Insulation Standards*

In 1974, the California Commission on Housing and Community Development adopted noise insulation standards for multi-family residential buildings (Title 24, Part 2, California Code of Regulations). Title 24 establishes standards for interior room noise (attributable to outside noise sources). The regulations also specify that acoustical studies must be prepared whenever a residential building or structure is proposed to be located near an existing or adopted freeway route, expressway, parkway, major street, thoroughfare, rail line, rapid transit line, or industrial noise source, and where such noise source or sources create an exterior Community Noise Equivalent Level (CNEL) or Ldn of 60 dB or greater. Such acoustical analysis must demonstrate that the residence has been designed to limit intruding noise to an interior CNEL (or Ldn) of at least 45 dB.

#### Local Regulations and Standards

##### *San Diego County General Plan, Noise Element, (Part VIII)*

The Noise Element of the County of San Diego General Plan establishes limitations on sound levels to be received by noise sensitive land uses (NSLUs). New development may cause an existing NSLU to be affected by noise caused by the new development, or it may create or locate a NSLU in such a place that it is affected by noise. The Noise Element identifies airports and traffic on public roadways as the major sources of noise. The Noise Element states that an acoustical study is required if it appears that a NSLU would be subject to noise levels of CNEL equal to 60 decibels (A) or greater. If that study confirms that greater than 60 dB CNEL would be experienced, modifications that reduce the exterior noise level to less than 60 dB CNEL and the interior noise levels to below 45 dB CNEL must be made to the development.

##### *County of San Diego Noise Ordinance*

The County of San Diego Noise Ordinance establishes prohibitions for disturbing, excessive, or offensive noise, and provisions such as sound level limits for the purpose of securing and promoting the public health, comfort, safety, peace, and quiet for its citizens. Planned compliance with sound level limits and other specific parts of the ordinance allows presumption that the noise is not disturbing, excessive, or offensive. Limits are specified depending on the zoning placed on a property (e.g., varying densities and intensities of residential, industrial and commercial zones).



### **3.1.8.2 Analysis of Project Effects and Determination as to Significance**

The expected roadway noise impact from SR-78 and Pine Hills Road were projected using Sound32, Caltrans' version of the Federal Highway Administration (FHWA) traffic noise model and in accordance with Caltrans Technical Noise Supplement (TeNS). The results of this analysis are based on the Caltrans Highway Design Manual California Vehicle Noise Emission Levels (CALVENO).

Outdoor observers were located in noise sensitive land use areas and were placed five feet above the pad elevation and approximately ten feet from the top of the slope. All second floor observers were located fifteen feet above the proposed finished floor elevation at the anticipated building façades.

The key factors which determine the impact of vehicular traffic noise include the lane travel speed, the mix of cars and trucks on the roadway volume, surrounding site conditions, and peak hour traffic volumes. Input data was taken using site plans to identify the relationship between the roadway centerline elevation, the pad elevation and the centerline distance to the noise barrier, the backyard observer and at the building façade to predict the future noise environment. For the purpose of this analysis, the roadway segments extend a minimum of 300 feet beyond any observer location.

Noise is measured in sound pressure levels known as decibels (dB). 'A-weighted' decibels (dBA) reflect only those frequencies which are audible to the human ear. The CNEL is the weighted average of the intensity of a sound with corrections for the time of day and averaged over 24 hours. The County of San Diego relies on the CNEL noise standard to assess transportation related impacts on noise sensitive land use. Guidelines discussed below use the dBA CNEL measurements to determine impact significance. Noise contours are lines that are drawn around a noise source indicating a constant or equal level of noise exposure. The use of noise contours allows graphic representation of the areas where significant noise impacts occur.

Noise-sensitive land uses are residential developments, seasonal residential developments, and facilities such as hospitals, nursing homes/retirement homes, schools, and daycare centers. The onsite noise-sensitive land uses include the 24 single-family homes. The Proposed Project would have an adverse effect on the area if it exposes any on- or offsite future noise sensitive land uses to exterior or interior noise in excess of the levels defined below.

#### Guidelines for the Determination of Significance

The guidelines for the Proposed Project are from the *County of San Diego Guidelines for Determining Significance, Noise*.

#### *Noise Sensitive Land Uses Affected by Airborne Noise*

The guidelines were used to determine whether Proposed Project implementation would result in the exposure of any on-or off-site, existing or reasonably foreseeable future Noise Sensitive Land Uses (NSLU) to exterior or interior noise (including noise generated from the Proposed Project, together with noise from roads [existing and planned Circulation Element roadways], railroads, airports, heliports and all other noise sources) in excess of any of the following:

1. Exterior Locations:
  - a. 60 dB (CNEL)<sup>2</sup>; or

- b. an increase of 10 dB (CNEL) over pre-existing noise.

In the case of single-family residential detached NSLUs, exterior noise shall be measured at an outdoor living area which adjoins and is on the same lot as the dwelling, and which contains at least the following minimum area:

- |   |                     |
|---|---------------------|
| (1) Net lot area up to 4,000 sq. ft.:       | 400 square feet     |
| (2) Net lot area 4,000 sq. ft. to 10 acres: | 10% of net lot area |
| (3) Net lot area over 10 acres:             | 1 acre              |

2. Interior Locations:

45 dB (CNEL) except for the following cases:

- a. Rooms which are usually occupied only a part of the day (schools, libraries, or similar facilities), the interior one-hour average sound level due to noise outside should not exceed 50 decibels (A).
- b. Corridors, hallways, stairwells, closets, bathrooms, or any room with a volume less than 490 cubic feet.

*Project-Generated Airborne Noise*

- A. The project would have a significant impact if it generates airborne noise which, together with noise from all sources, would be in excess of the following: Non-Construction Noise: The limit specified in San Diego County Code Section 36.404, General Sound Level Limits, at the property line of the property on which the noise is produced or at any location on a property that is receiving the noise. Section 36.404 provides the following limits (Table 3-8-1):

**Table 3-8-1  
San Diego County Code Section 36.404  
SOUND LEVEL LIMITS IN DECIBELS (dBA)**

ZONE	TIME	ONE-HOUR AVERAGE SOUND LEVEL LIMITS (dBA)
(1) R-S, R-D, R-R, R-MH, A-70, A-72, S-80, S-81, S-87, S-90, S-92 and R-V and R-U with a density of less than 11 dwelling units per acre.	7 a.m. to 10 p.m.	50
	10 p.m. to 7 a.m.	45
(2) R-RO, R-C, R-M, S-86, V5 and R-V and R-U with a density of 11 or more dwelling units per acre.	7 a.m. to 10 p.m.	55
	10 p.m. to 7 a.m.	50
(3) S-94, V4 and all other commercial zones.	7 a.m. to 10 p.m.	60
	10 p.m. to 7 a.m.	55
(4) V1, V2  V1, V2  V1  V2	7 a.m. to 7 p.m.	60
	7 p.m. to 10 p.m.	55
	10 p.m. to 7 a.m.	55
	10 p.m. to 7 a.m.	50
	7 a.m. to 10 p.m.	70

V3	10 p.m. to 7 a.m.	65
(5) M-50, M-52 and M-54	Anytime	70
(6) S-82, M-56 and M-58	Anytime	75
(7) S88 (see subsection (c) below)		

- (a) If the measured ambient level exceeds the applicable limit noted above, the allowable one hour average sound level shall be the ambient noise level, plus three decibels. The ambient noise level shall be measured when the alleged noise violation source is not operating.
  - (b) The sound level limit at a location on a boundary between two zones is the arithmetic mean of the respective limits for the two zones; provided however, that the one-hour average sound level limit applicable to extractive industries, including but not limited to borrow pits and mines, shall be 75 decibels at the property line regardless of the zone which the extractive industry is actually located.
- B. Construction Noise: Noise generated by construction activities related to the project would exceed the standards listed in San Diego County Code Section 36.409, Sound Level Limitations on Construction Equipment.

Section 36.409 states:

Except for emergency work, it shall be unlawful for any person to operate construction equipment or cause construction equipment to be operated, that exceeds an average sound level of 75 decibels for an eight-hour period, between 7 a.m. and 7 p.m., when measured at the boundary line of the property where the noise source is located or on any occupied property where the noise is being received.

- C. Impulsive Noise: Noise generated by the project would exceed the standards listed in San Diego County Code Section 36.410, Sound Level Limitations on Impulsive Noise.

Section 36.410 states:

In addition to the general limitations on sound levels in section 36.404 and the limitations on construction equipment in section 36.409, the following additional sound level limitations shall apply:

- a. Except for emergency work or work on a public road project, no person shall produce or cause to be produced an impulsive noise that exceeds the maximum sound level shown in Table 3-8-2, "San Diego County Code Section 36.410 Maximum Sound Level (Impulsive) Measured at Occupied Property in Decibels (dBA)," when measured at the boundary line of the property where the noise source is located or on any occupied property where the noise is received, for 25 percent of the minutes in the measurement period, as described in subsection (c) below. The maximum sound level depends on the use being made of the occupied property.

**Table 3-8-2  
San Diego County Code Section 36.410  
MAXIMUM SOUND LEVEL (IMPULSIVE) MEASURED  
AT OCCUPIED PROPERTY IN DECIBELS (dBA)**

OCCUPIED PROPERTY USE	dB(A)
Residential, village zoning or civic use	82
Agricultural, commercial or industrial use	85

- a. Except for emergency work, no person working on a public road project shall produce or cause to be produced an impulsive noise that exceeds the maximum sound level shown in Table 3-8-3, "San Diego County Code Section 36.410 Maximum Sound Level (Impulsive) Measured at Occupied Property in Decibels (dBA) for Public Road Projects," when measured at the boundary line of the property where the noise source is located or on any occupied property where the noise is received, for 25 percent of the minutes in the measurement period, as described in subsection (c) below. The maximum sound level depends on the use being made of the occupied property.

**Table 3-8-3  
San Diego County Code Section 36.410  
MAXIMUM SOUND LEVEL (IMPULSIVE) MEASURED AT OCCUPIED  
PROPERTY IN DECIBELS (dBA) FOR PUBLIC ROAD PROJECTS**

OCCUPIED PROPERTY USE	dB(A)
Residential, village zoning or civic use	85
Agricultural, commercial or industrial use	90

- c. The minimum measurement period for any measurements conducted under this section shall be one hour. During the measurement period a measurement shall be conducted every minute from a fixed location on an occupied property. The measurements shall measure the maximum sound level during each minute of the measurement period. If the sound level caused by construction equipment or the producer of the impulsive noise, exceeds the maximum sound level for any portion of any minute it would deemed that the maximum sound level was exceeded during that minute.

Ground-Borne Vibration and Noise Impacts

Exposure of NSLUs and other vibration sensitive uses (i.e., research and manufacturing) to existing and future ground-borne vibration and noise arising from operations related to, but not limited by, materials handling, blasting, transportation corridors, railroads, and extractive industries is another typical adverse effect of development. This includes vibration sources caused by new development impacting existing or foreseeable future NSLUs and vibration sensitive uses. It also includes new development which creates or locates NSLUs and other vibration sensitive uses in such a place that they are impacted by ground-borne vibration and noise (a typical example being a new residential project locating residences close to a commuter railroad line).

### Analysis

*Guideline 1: The project would have an adverse effect to the area if it exposes any on- or offsite future NSLU to exterior or interior noise in excess of 60dB CNEL for exterior locations and 45dB CNEL for interior locations.*

One noise measurement location was set up on the Proposed Project Site to assess roadway noise impacts. This is shown on Figure 3-7-1, "Noise Measurement Locations."

The primary source of noise near the Proposed Project area would be from the traffic noise along SR-78 and Pine Hills Road. The Proposed Project's internal roads would also generate some background traffic noise. However, due to the topography, roadway grade changes, and vehicular speeds that are anticipated, traffic noise from these internal roads would not make a significant contribution to the noise environment.

Noise contour boundaries were developed and the results of the testing indicate that 60 dBA CNEL contours are all located along edge of roadways approximately 220-feet from the centerline along SR-78 and 100-feet from the centerline along Pine Hills Road. The noise contour for the Proposed Project shows that NSLU areas would not exceed the County of San Diego 60 dBA CNEL exterior noise standard. Figure 3-7-2, "Future Noise Level Contours," provides the location of the future first and second floor 75 and 60 dBA CNEL noise contours for the Proposed Project layout.

No proposed pads fall within 60 dBA CNEL noise contours. Since the Proposed Project's exterior noise levels at the building façades do not exceed 60 dBA CNEL, no interior noise assessment would be required. Guideline 1 is not exceeded. Impacts are not significant and no mitigation is required.

*Guideline 2: The project would have an adverse effect to the area if any person causes or allows the creation of any noise generated by non-construction activities related to the project to the extent that the one-hour average sound level, at any point on or beyond the boundaries of the property exceeds the property line standard of 50 dBA Leq for the daytime hours of 7 a.m. to 10 p.m. and 45 dBA Leq for the nighttime hours of 10 p.m. to 7 a.m.*

The Proposed Project property and all surrounding properties are zoned A-70 and A-72. According to Section 36.404 of the County of San Diego Noise Ordinance, all areas zoned A-70 and A-72 have a most restrictive property line standard of 50 dBA Leq for the daytime hours of 7 a.m. to 10 p.m. and 45 dBA Leq for the nighttime hours of 10 p.m. to 7 a.m. Onsite noise generation due to the Proposed Project



would primarily consist of normal residential activities and potential agricultural operations.

Agricultural operations are exempt under Section 36.417 Subsection b, item 2 of the County Noise Ordinance. Therefore, no impacts will occur.

Guideline 2 is not exceeded. Impacts are not significant and no mitigation is needed.

*Guideline 3: The project would have an adverse effect to the area if noise generated by construction activities related to the project occur as a result of construction equipment being operated so as to cause at or beyond the property line of any property upon which a legal dwelling unit is located an average sound level greater than 75 decibels between the hours of 7 a.m. and 7 p.m.*

*Guideline 4: The project would have an adverse effect to the area if any person operates construction equipment between the hours of 7 p.m. of any day and 7 a.m. of the following day or Sundays and holidays between the hours of 5 p.m. and 10 a.m., provided that the average sound level does not exceed 75 decibels during the period of operation.*

Individual lots would be graded separately and located at least 90 feet from any existing or proposed occupied property line. It was determined, based on the proposed grading operations for each lot, that at a distance of 90 feet or greater, the noise levels would be at 73.5 dBA, which is below the County's 75 dBA threshold. Therefore, no construction or impulsive noise impacts would occur.

The nearest proposed residential property line for the Proposed Project site is located 140 feet or more from the pad grading operations for Lot 5. All other property lines, existing and proposed, are located further from the acoustic center of proposed pad grading operations.

Guidelines 3 and 4 are not exceeded as impacts are not significant. No mitigation is required.

*Guideline 5: The project would have adverse effects if it exposes NSLUs and other vibration sensitive uses to existing and future ground-borne vibration and noise arising from operations related to, but not limited by, materials handling, blasting, transportation corridors, railroads, and extractive industries.*

Ground-borne vibration and noise impacts were not assessed due to the nature of the Proposed Project as it does not generate ongoing vibration nor is it near a source that does. Moreover, the Proposed Project location does not require a vibration assessment. Guideline 5 is not exceeded, impacts are less than significant, and no mitigation is required.

### **3.1.8.3 Cumulative Impact Analysis**

The Proposed Project does not create a direct impact of more than 3 dBA CNEL on any roadway segment and no cumulative noise increase of 3 dBA CNEL or more were found. Therefore, the Proposed Project's direct and cumulative contributions to off-site roadway noise increases would not cause any significant impacts to any existing or future noise sensitive land uses.

### **3.1.8.4 Significance of Impacts Prior to Mitigation**

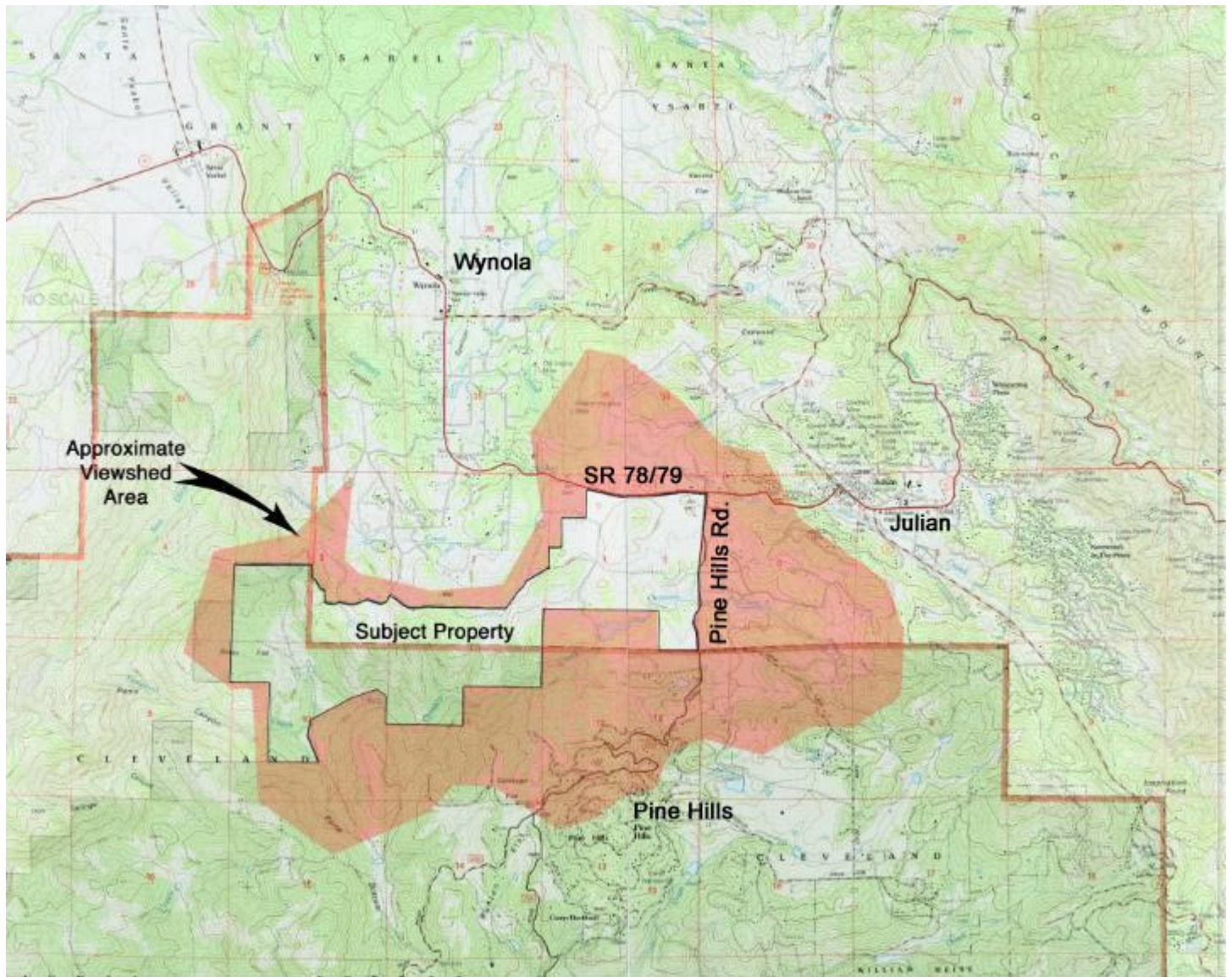
There are no significant noise impacts from the Proposed Project.

### **3.1.8.5 Conclusion**

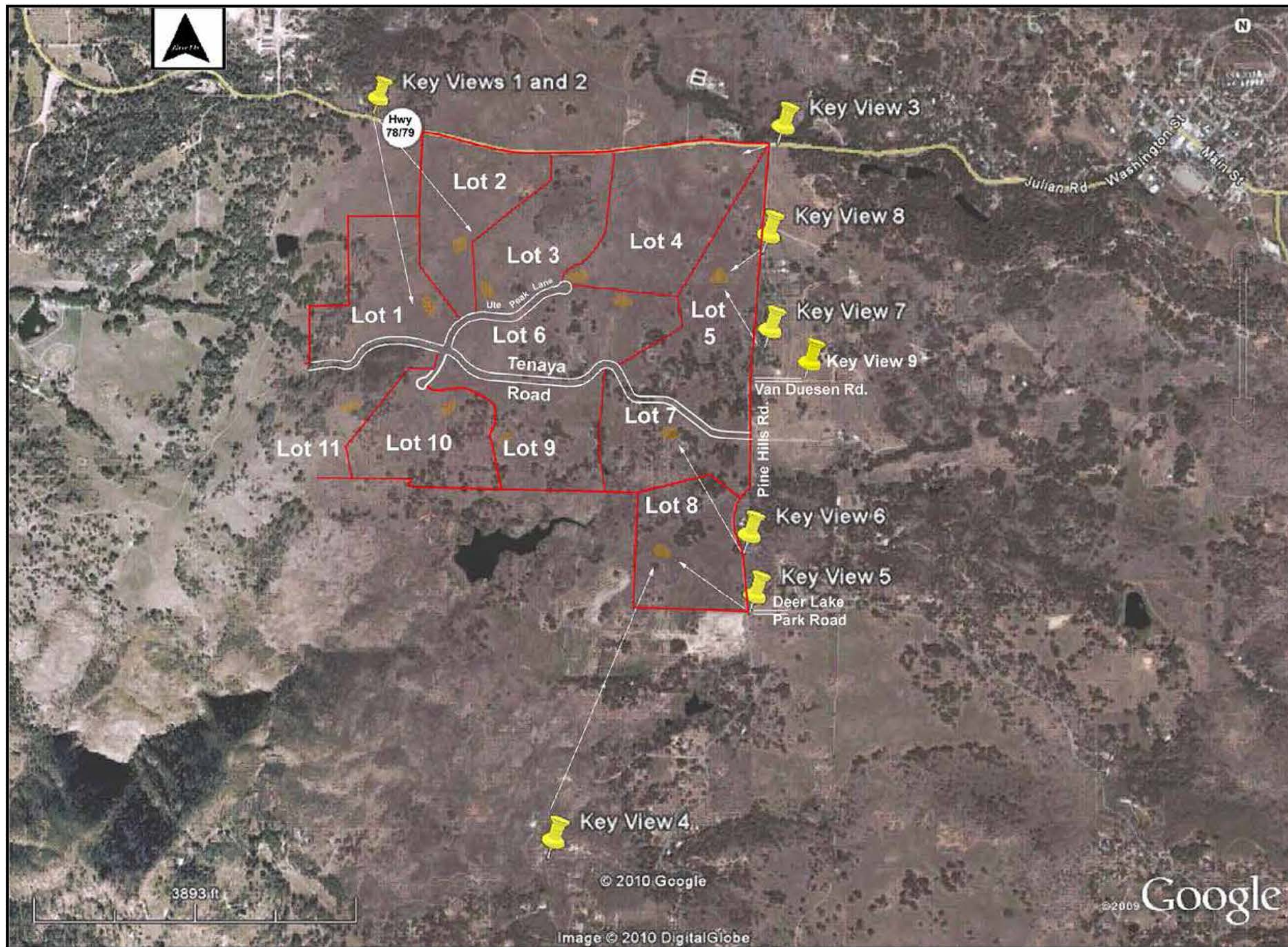
A consultant on the County's CEQA Consultant List approved to prepare acoustical analyses conducted a study for the Proposed Project. A comprehensive range of effects were evaluated which include noise sensitive land uses and project-generated airborne noise (i.e. construction, non-construction and impulsive noise). Ground-borne noise was not evaluated because the Proposed Project does not generate ongoing vibration nor is it near a source that does. It was determined that the Proposed Project would not have significant effects in any of the areas that were assessed 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.

Cumulative impacts were found to be not significant because the Proposed Project does not create a direct impact because the Proposed Project's direct and cumulative contributions to off-site roadway noise increases would not cause any significant impacts to any existing or future noise sensitive land uses.

No impacts are anticipated and no mitigation is required.









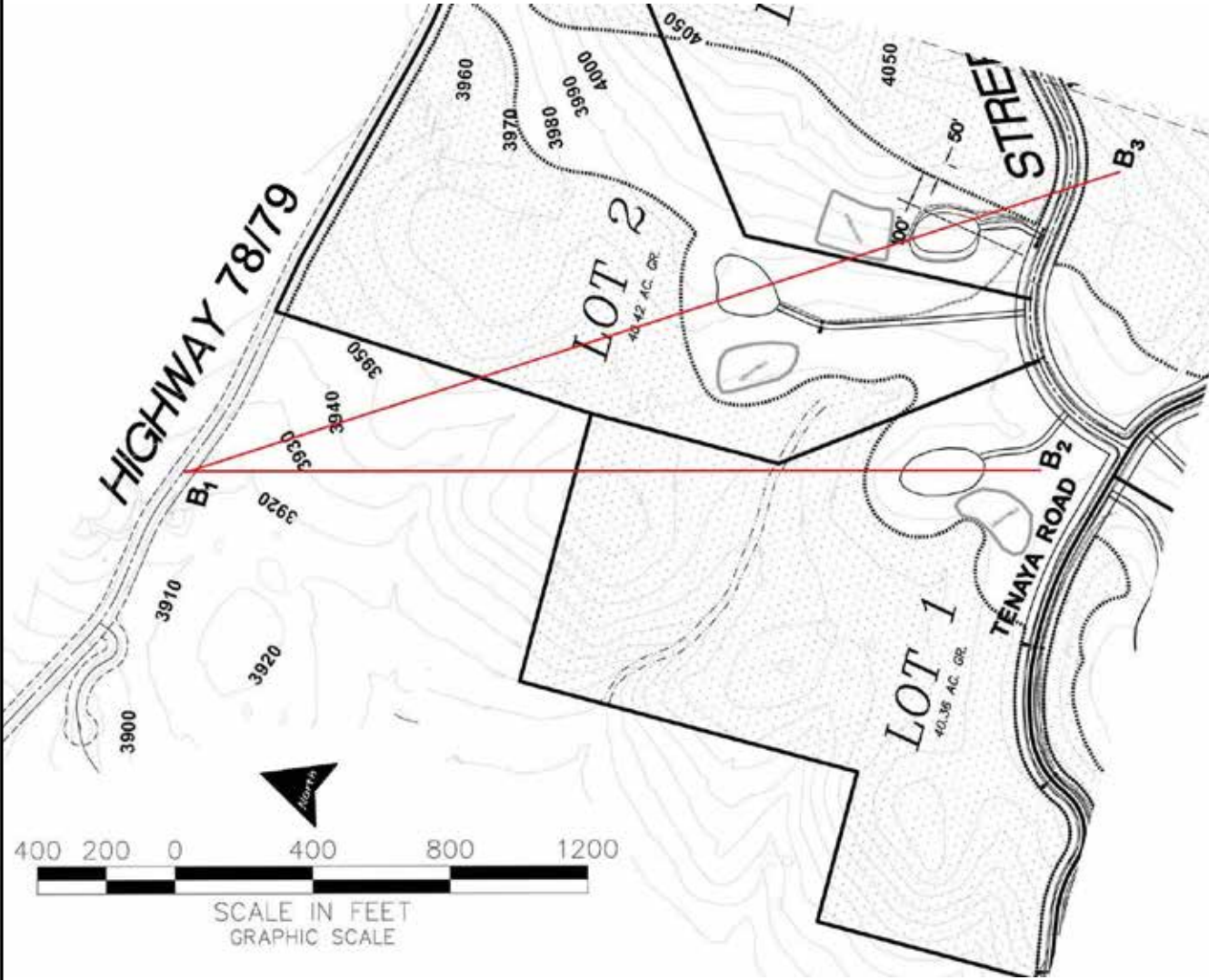
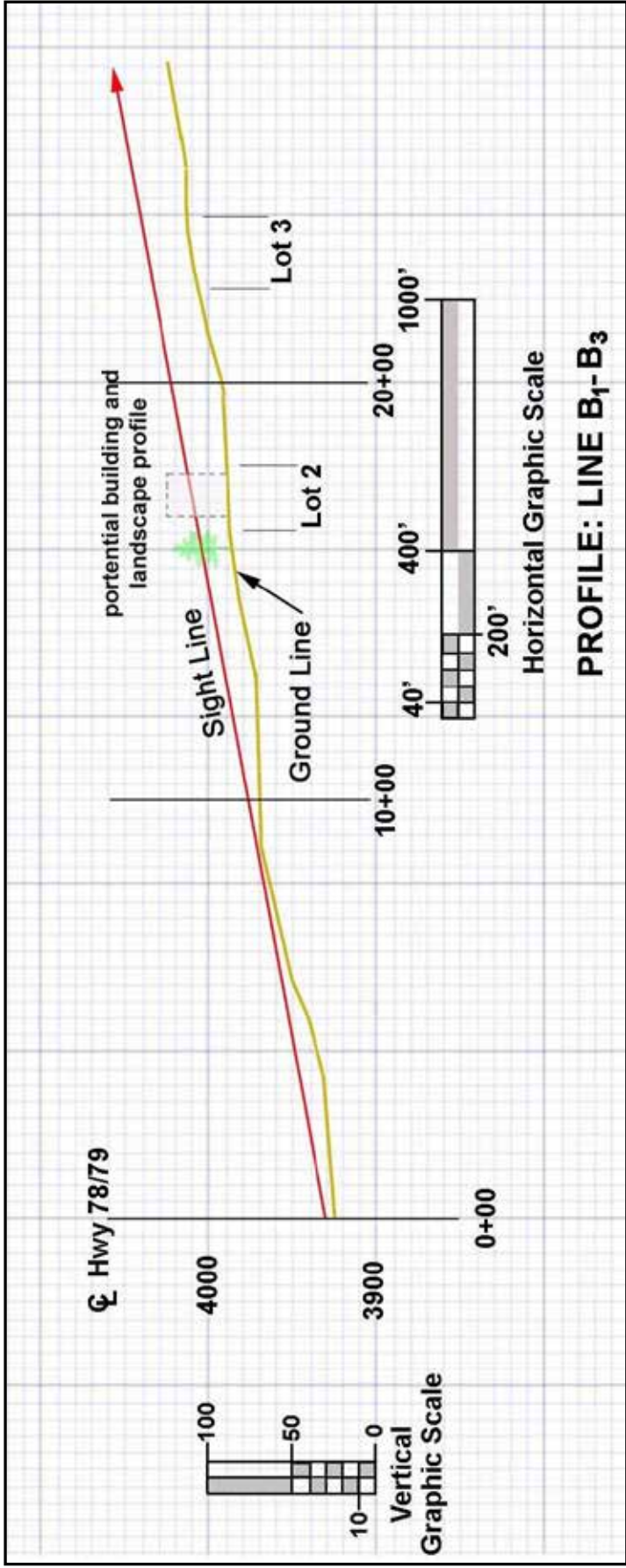
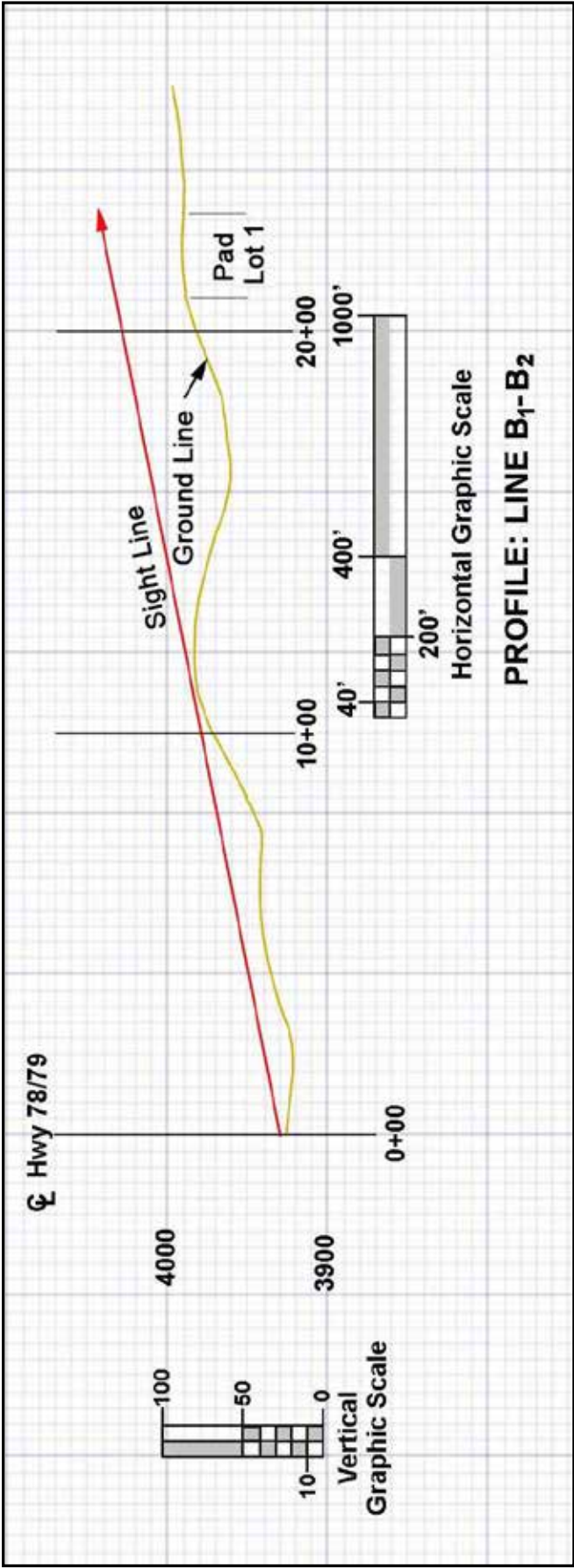


Figure 3-1-3

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





**Upper View**

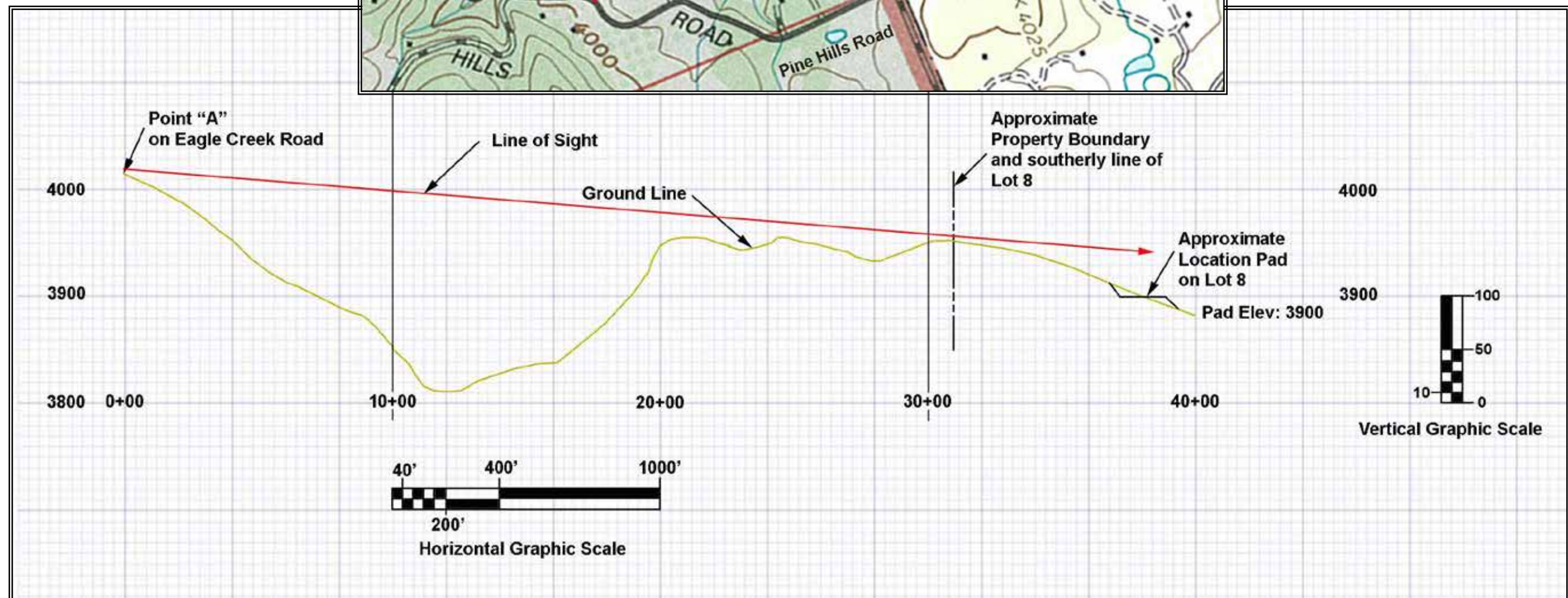
The perspective is that of travelers approaching the site from the east, looking to the west.

**Lower View**

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







Datum is from USGS Mapping.

See Figure 9A for photosimulation of the view.





Line of sight from nearest properties to Lot 8

**KEY VIEW 5**  
From Southeast Corner of Project  
Looking North on Pine Hills Road

**Figure**  
3-1-6





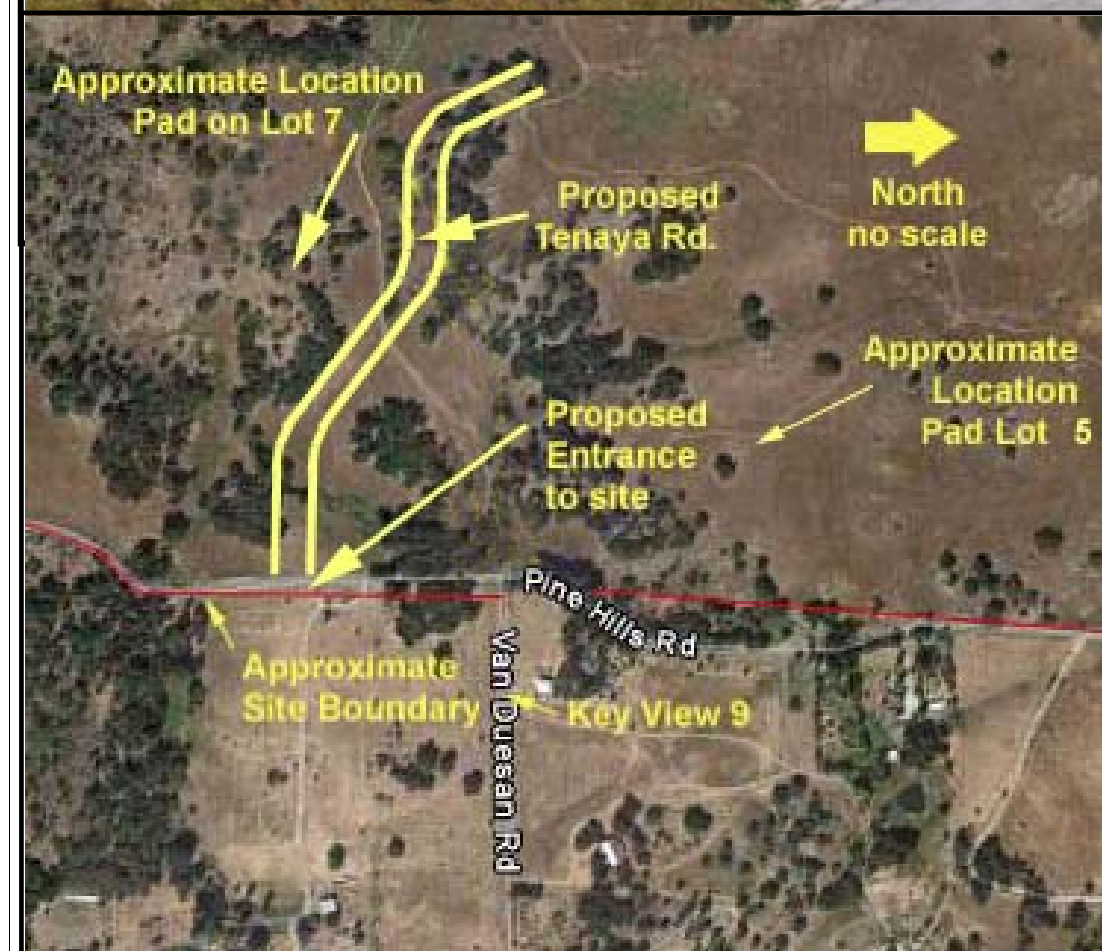
**KEY VIEW 6**  
Looking Northwest from Pine Hills Road

**Figure 3-1-7**









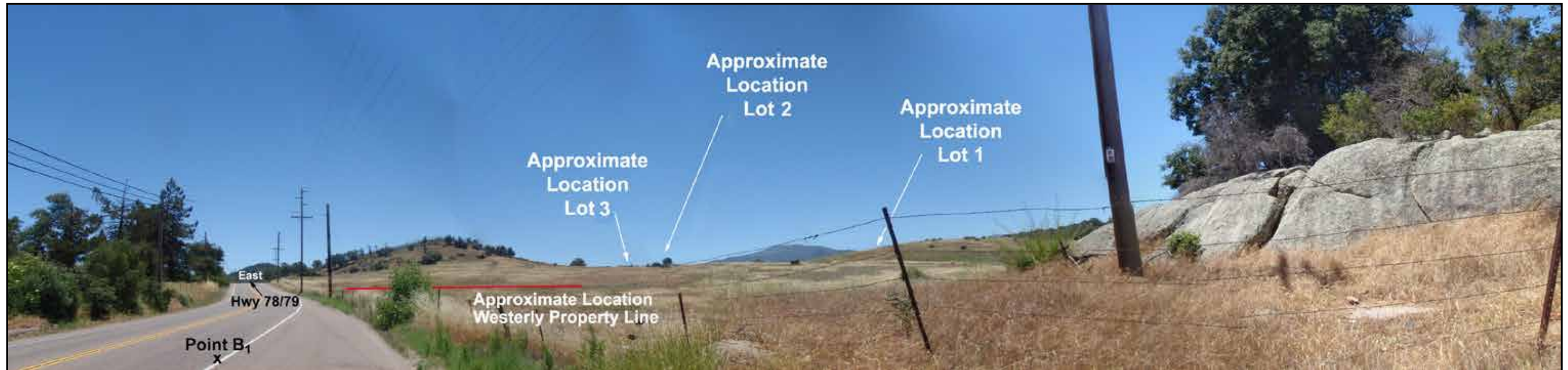
Aerial  
Plan View

Photosimulation  
Looking West along Van Duesen Road  
To Project Entrance – Tenaya Road

KEY VIEW 9  
Looking West from Van Duesen Road

Figure  
3-1-9





**NOTE:**  
See Figure 3-1-3 for plan and profile of proposed lots.

**KEY VIEWS**  
Photosimulation Looking East on SR 78/79

**Figure 3-1-10**

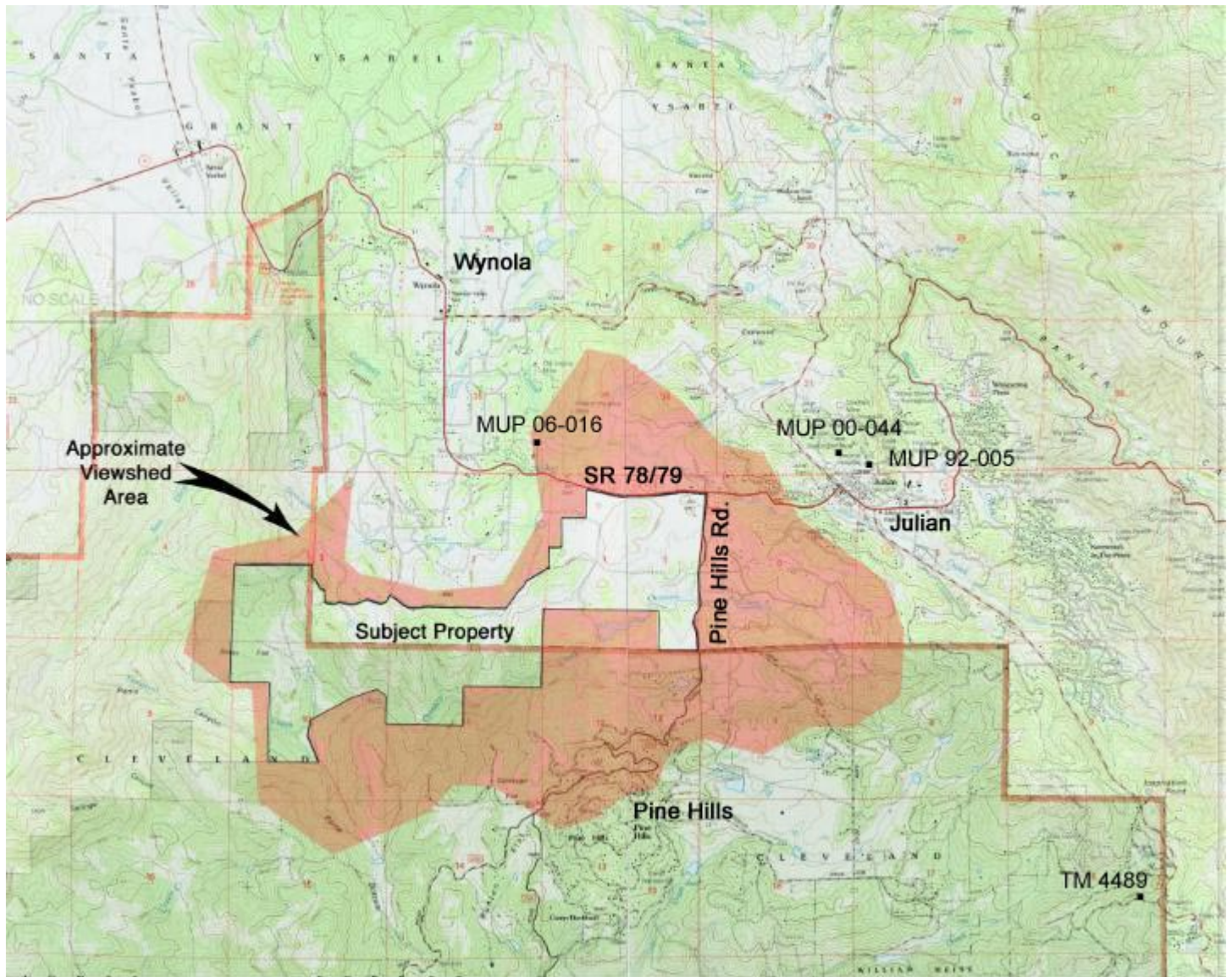




KEY VIEW 4  
Photosimulation

Figure  
3-1-11













## PRIME FARMLAND

LAND WITH THE BEST COMBINATION OF PHYSICAL AND CHEMICAL CHARACTERISTICS ABLE TO SUSTAIN LONG TERM PRODUCTION OF AGRICULTURAL CROPS. THIS LAND MUST HAVE BEEN USED FOR PRODUCTION OF IRRIGATED CROPS AT SOME TIME DURING THE FOUR YEARS PRIOR TO THE MAPPING DATE.



## FARMLAND OF STATEWIDE IMPORTANCE

LAND WITH A GOOD COMBINATION OF PHYSICAL AND CHEMICAL CHARACTERISTICS FOR AGRICULTURAL PRODUCTION, HAVING ONLY MINOR SHORTCOMINGS, SUCH AS LESS ABILITY TO STORE SOIL MOISTURE, COMPARED TO PRIME FARMLAND. THIS LAND MUST HAVE BEEN USED FOR PRODUCTION OF IRRIGATED CROPS AT SOME TIME DURING THE FOUR YEARS PRIOR TO THE MAPPING DATE.



## UNIQUE FARMLAND

LAND USED FOR PRODUCTION OF THE STATE'S MAJOR CROPS ON SOILS NOT QUALIFYING FOR PRIME OR STATEWIDE IMPORTANCE. THIS LAND IS USUALLY IRRIGATED, BUT MAY INCLUDE NONIRRIGATED FRUITS AND VEGETABLES AS FOUND IN SOME CLIMATIC ZONES IN CALIFORNIA.



## FARMLAND OF LOCAL IMPORTANCE

LAND THAT MEETS ALL THE CHARACTERISTICS OF PRIME AND STATEWIDE, WITH THE EXCEPTION OF IRRIGATION.  
FARMLANDS NOT COVERED BY THE ABOVE CATEGORIES BUT ARE OF SIGNIFICANT ECONOMIC IMPORTANCE TO THE COUNTY. THEY HAVE A HISTORY OF GOOD PRODUCTION FOR LOCALLY ADAPTED CROPS. THE SOILS ARE GROUPED IN TYPES THAT ARE SUITABLE FOR TRUCK CROPS (SUCH AS TOMATOES, STRAWBERRIES, CUCUMBERS, POTATOES, CELERY, SQUASH, ROMAINE LETTUCE, AND CAULIFLOWER) AND SOILS SUITED FOR ORCHARD CROPS (AVOCADOS AND CITRUS).



## GRAZING LAND

LAND ON WHICH THE EXISTING VEGETATION IS SUITABLE FOR GRAZING OF LIVESTOCK. THE MINIMUM MAPPING UNIT FOR THIS CATEGORY IS 40 ACRES.



## URBAN AND BUILT-UP LAND

RESIDENTIAL LAND WITH A DENSITY OF AT LEAST SIX UNITS PER TEN-ACRE PARCEL, AS WELL AS LAND USED FOR INDUSTRIAL AND COMMERCIAL PURPOSES, GOLF COURSES, LANDFILLS, AIRPORTS, SEWAGE TREATMENT, AND WATER CONTROL STRUCTURES.



## OTHER LAND

LAND WHICH DOES NOT MEET THE CRITERIA OF ANY OTHER CATEGORY. COMMON EXAMPLES INCLUDE LOW-DENSITY RURAL DEVELOPMENTS, WETLANDS, DENSE BRUSH AND TIMBERLANDS, GRAVEL PITS, AND SMALL WATER BODIES.



## WATER

PERENNIAL WATER BODIES WITH AN EXTENT OF AT LEAST 40 ACRES.



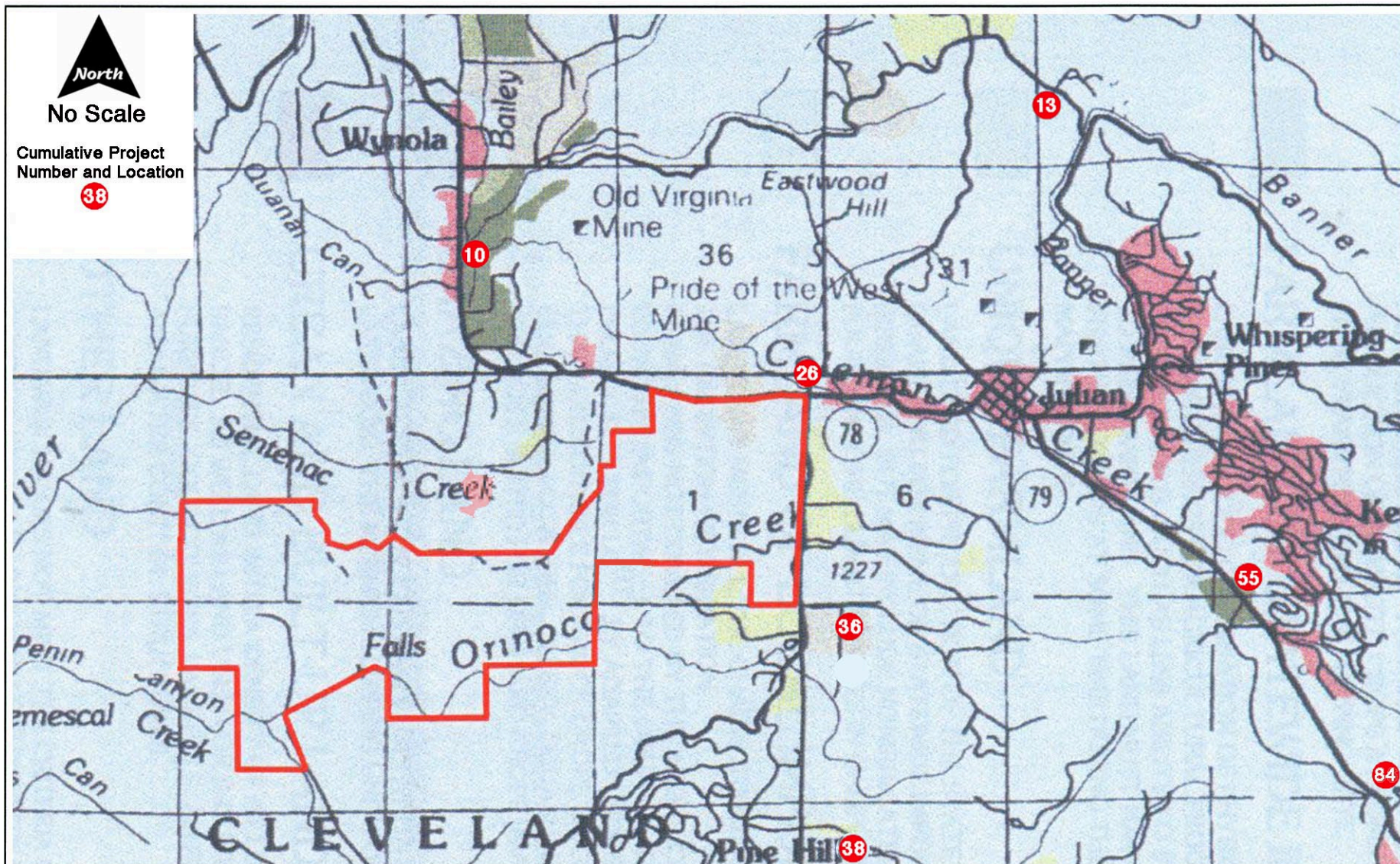


Figure  
3-2-3

## Cumulative Projects on Farmland Mapping and Monitoring Program Map

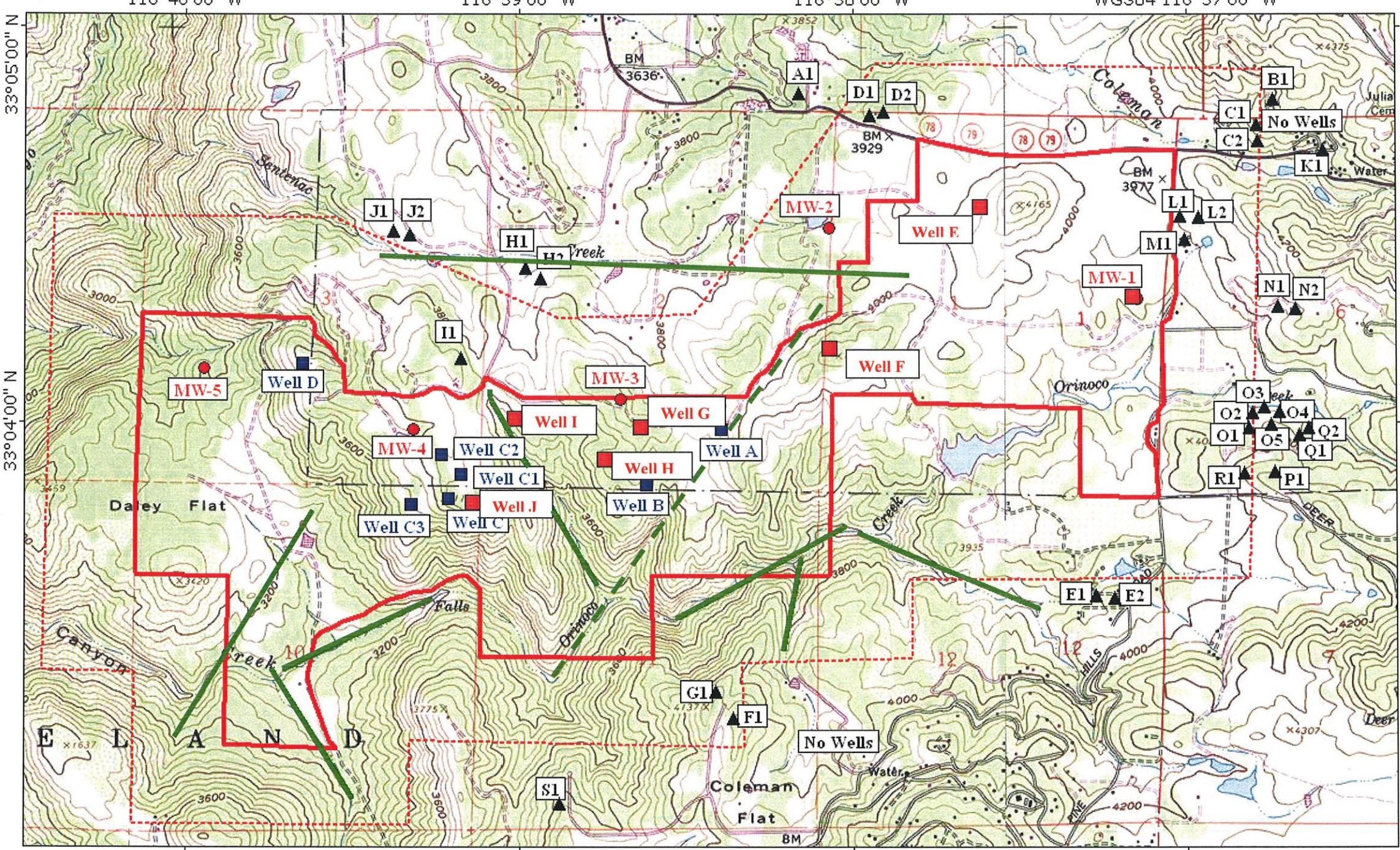




TOPO! map printed on 02/03/05 from "well locations.tpo" and "Untitled.tpg"

**LEGEND:**

- Property Boundary
- 1/4-Mile Study Area
- Aerial Photo Lineaments
- Recently Pump-Tested Well
- Previously Pump-Tested Well
- Offsite Well
- Onsite Monitoring Well

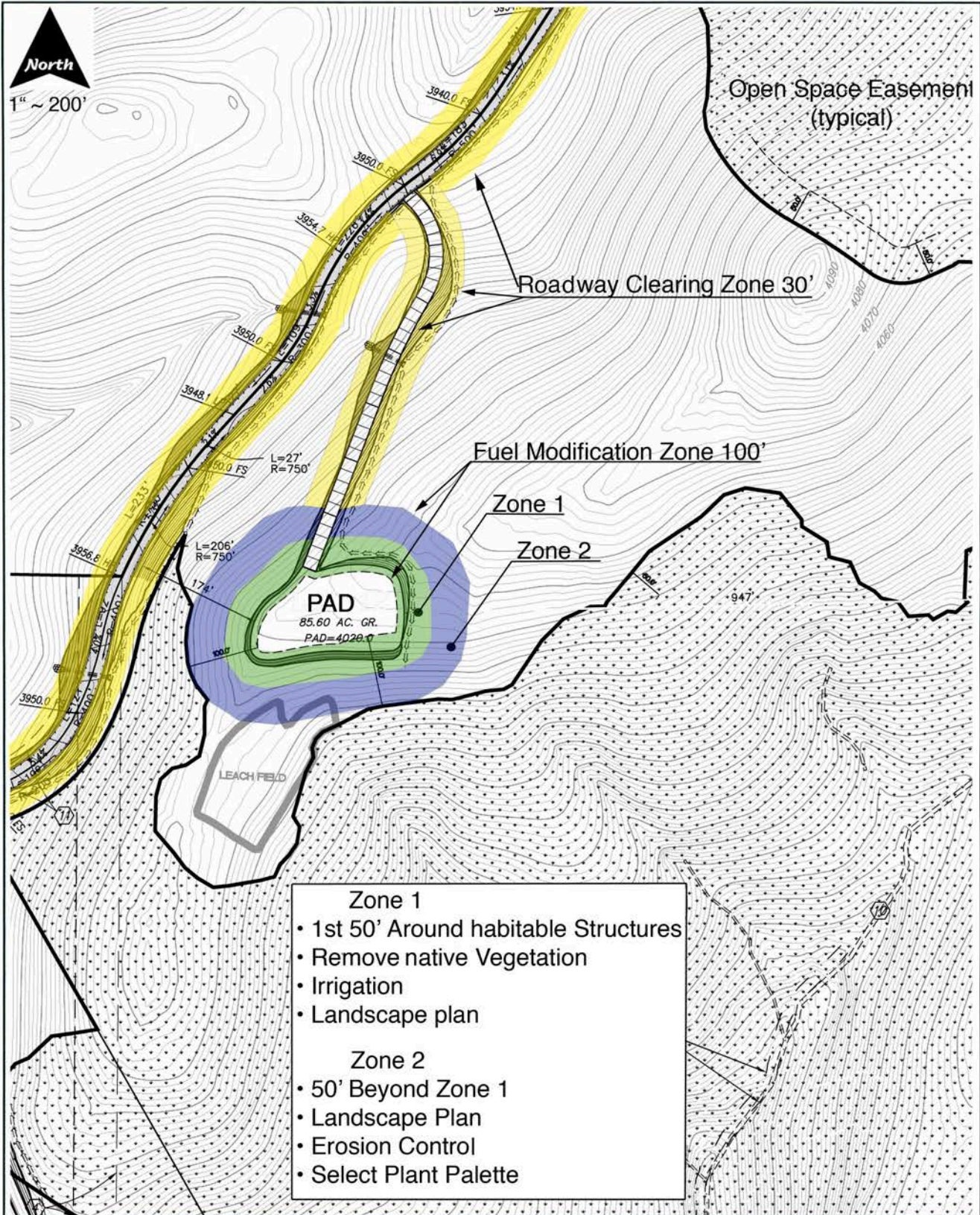


Groundwater Study Area and Well Locations

Figure 3-5-1

TN/MN 13°  
0 1000 FEET 0 500 1000 METERS  
Printed from TOPO! ©2000 National Geographic Holdings (www.topo.com)

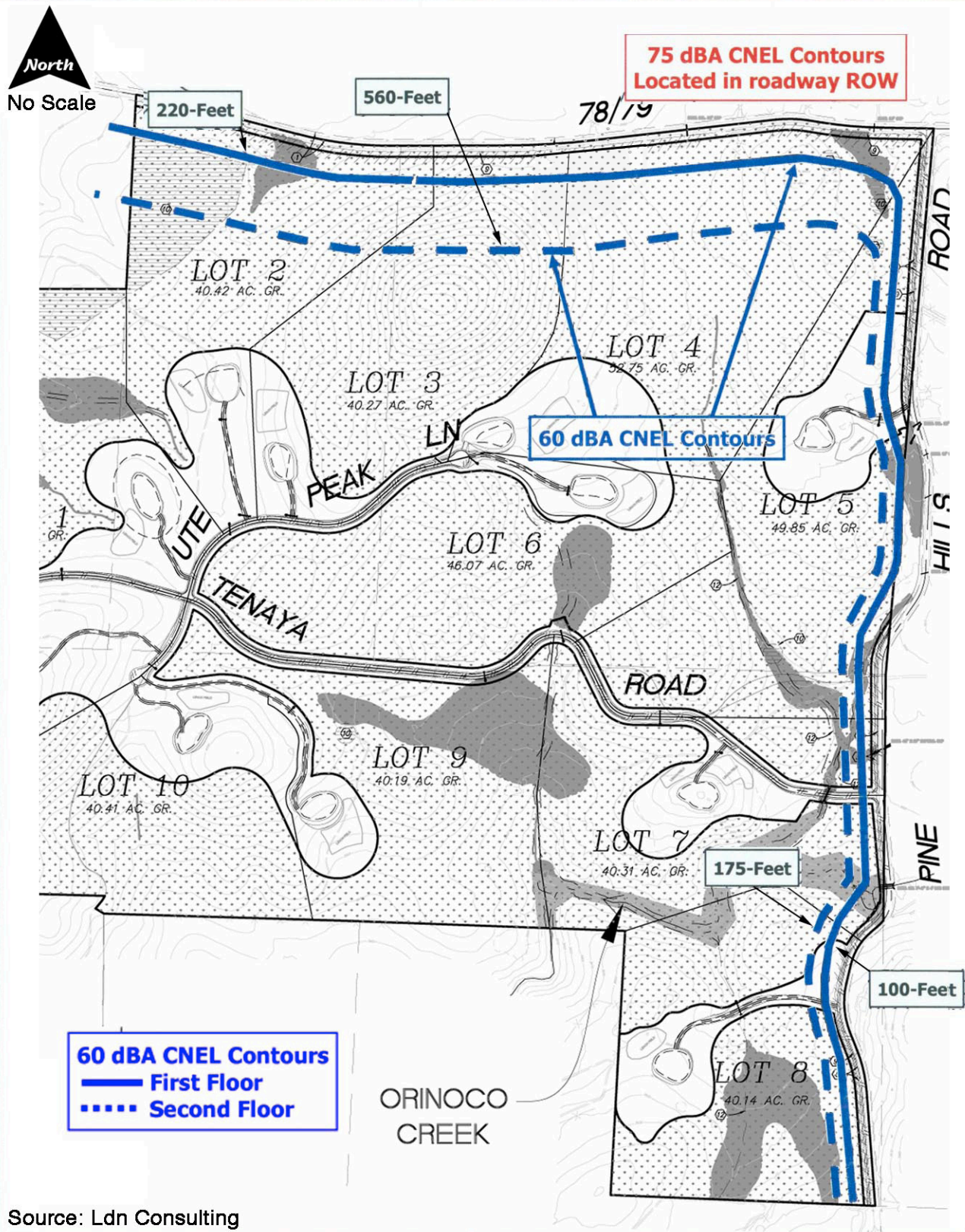












Source: Ldn Consulting



Future Noise Level Contours

Figure 3-7-2

# Cumulative Projects List

Table  
3-2-1

#	Fig.** corresponding #	Project Number	Project Name	Agricultural Use Onsite	Important Agricultural Resource? Prime Farmland (PF) Farmland of Statewide Importance (FSI)	Indirect Impact Estimate (Acres)	Direct Impact Estimate (Acres)
1	10	MUP 98-003	Spencer Winery-add'l winery bldg.	Vineyard	PF	0 (adds ag)	0 (adds ag)
2	13	MUP 98-011	Jenkins Winery-change roof style	Winery	FSI	0	0
3	16	TPM 20863	Hoskings Rch Rd	None	No	0	0
4	25	MUP 77-138	Julian Propane	None	No	0	0
5	26	MUP 77-113	Julian Sanitation Dist.	None	FSI	0	2
6	27	Site Plan 00-018	Straub	None	No	0	0
7	31	ZAP 05-014	Austin 2 <sup>nd</sup> Dwelling	None	No	0	0
8	33	ZAP 07-010	Sloan Star Oaks B&B	None	No	0	0
9	34	AD 99-022	Fisch	None	No	0	0
10	36	TPM 19932	Ortega	None	FSI	0	3
11	38	MUP 75-083	YMCA Camp Marston	None	PF	0	4
12	40	MUP mod/dev 68-084	Lakeside Prebyterian	None	No	0	0
13	41	MUP mod/dev 72-460	Grl Sct. Cmp. Winacka	None	No	0	0
14	43	Site Plan 02-029	Behen	None	No	0	0
15	45	Site Plan 03-034	Brown Family Trust	None	No	0	0
16	46	Site Plan 03-059	Rose Steadman	None	No	0	0
17	47	Site Plan 07-017	Edinger Family	None	No	0	0
18	48	Site Plan 01-028	Brown Residence	None	No	0	0
19	49	Site Plan mod/dev 01-049	Gallo	None	No	0	0
20	50	Site Plan 02-043	Ruffel & Morris	None	No	0	0
21	51	Site Plan 02-045	Jones	None	No	0	0
22	52	Site Plan 07-045	Wardle	None	No	0	0
23	54	TPM 20253	Sauter	None	No	0	0
24	55	Site Plan 10-004	Julian/Cuy. Fire Sta.	None	FSI	0	2
25	73	MUP 72-469	Manley Minor Deviation	None	No	0	0
26	79	Site Plan 03-046	NailZone Cingular	None	No	0	0
27	80	Site Plan 02-041	Robinson	None	No	0	0
28	81	Site Plan 05-011	Page Residence	None	No	0	0
29	82	MUP mod/dev 85-078	Catholic Conf. Site	None	No	0	0
30	84	MUP 97-005	Red Horse Winery	Winery	No	0	0
31	85	ZAP 01-102	Lundie 2 <sup>nd</sup> DU	None	No	0	0
32	87	TPM 20571	Learn Subdivision	None	No	0	0
33	88	TPM 20474	Kluczewich	None	No	0	0
34	89	MUP 82-081	Great Outdoor American Adv.	None	No	0	0
35	90	TM 4489	Julian Estates	None	No	0	0
TOTAL						0	11

### Maximum Daily Emissions Thresholds

<b>MAXIMUM DAILY EMISSIONS THRESHOLDS</b> (SAN DIEGO COUNTY GUIDELINES FOR DETERMINING SIGNIFICANCE FOR AIR QUALITY)		
<b>Pollutant</b>	<b>Construction</b>	<b>Operational</b>
NO <sub>x</sub>	250 lbs/day	250 lbs/day
PM <sub>10</sub>	100 lbs/day	100 lbs/day
PM <sub>2.5</sub>	55 lbs/day	55 lbs/day
SO <sub>x</sub>	250 lbs/day	250 lbs/day
CO	550 lbs/day	550 lbs/day
VOCs*	75 lbs/day	75 lbs/day

\* Threshold for VOCs based on threshold of significance for VOCs from the South Coast Air Quality Management District for the Coachella Valley.



### Maximum Daily Emissions Thresholds

**Table  
3-3-1**

**Summary of Construction Emissions (Pounds Per Day)**  
(With Project Design Considerations)

Construction Activities	VOC	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub> *	PM <sub>2.5</sub>
<b>Grading</b>						
Fugitive Dust	0	0	0	0	42.57	8.89
Off-Road Equipment	3.18	26.46	12.98	0	1.33	1.23
Worker Trips	0.04	0.07	1.18	0	0.01	0
<b>Underground/Infrastructure Activity</b>						
Off-Road Equipment	2.63	21.28	10.51	0	1.20	1.11
Worker Trips	0.04	0.06	1.10	0	0.01	0
<b>Paving</b>						
Off-Gas Emissions	1.76	0	0	0	0	0
Off-Road Equipment	3.20	19.17	10.47	0	1.68	1.55
On-Road Equipment	0.38	5.81	1.96	0.01	0.25	0.21
Worker Trips	0.04	0.08	1.37	0	0.01	0.01
<b>Off-Site Construction Activity</b>						
Off-Site Construction	6.60	45.40	31.80	0	7.40	3.20
<b>Building Construction Activity</b>						
Off-Road Equipment	4.08	23.31	14.31	0	1.67	1.54
Vendor Trips	0.04	0.55	0.43	0	0.03	0.02
Worker Trips	0.14	0.24	4.43	0	0.03	0.02
<b>Architectural Coatings Activity</b>						
Architectural Coating	12.35	0	0	0	0	0
Worker Trips	0.01	0.01	0.16	0	0	0
<b>Peak Day Mass Emissions</b>	<b>34.49</b>	<b>142.44</b>	<b>90.70</b>	<b>0.01</b>	<b>56.19</b>	<b>17.78</b>
SD County Screening Level Thresholds (SLTs)	75	250	550	250	100	55
<b>Significant?</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>

Source: URBEMIS 2007 v 9.2.4 and Road Construction Emissions Model, Version 6.2.2 (See Appendix "D" for more details)

\* Includes control efficiency for watering



**Summary of Construction Emissions (Pounds Per Day) With Project Design Considerations**

**Table  
3-3-2**



**Quantification of Carcinogenic Risks and Noncarcinogenic Hazards (Short-Term Construction Activity)**

Source	Maximum Concentration		Weight Fraction	Contaminant	Carcinogenic Risk			GP Update Total Use (afy)		
					URF	CPF	RISK	REL	RfD	Index
(a)	(ug/m3) (b)	(ug/m3) (c)	(d)	(e)	(ug/m3) (f)	(mg/kg/day) (g)		(ug/m3) (i)	(mg/kg/day) (j)	
Diesel	0.1192	1.4E-04	1.00E+00	Particulates	3.0E-04	1.1E+00	5.4E-07	5.0E+00	1.4E-03	2.5E-02



**Quantification of Carcinogenic Risks and  
Noncarcinogenic Hazards  
(Short-Term Construction Activity)**

**Table  
3-3-3**

### Summary of Operational Emissions (Summer) (Pounds Per Day)

Operational Activities	VOC	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
Area Source Emissions <sup>a</sup>	41.05	0.38	2.95	0	0.01	0.01
Operational Emissions <sup>b</sup>	11.02	11.25	101.73	0.08	13.35	2.62
<b>Peak Day Mass Emissions</b>	<b>52.07</b>	<b>11.63</b>	<b>104.68</b>	<b>0.08</b>	<b>13.36</b>	<b>2.63</b>
SD County Screening Level Thresholds (SLTs)	75	250	550	250	100	55
<b>Significant?</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>

<sup>a</sup> Includes emissions of natural gas, landscape maintenance equipment, and architectural coatings emissions

<sup>b</sup> Includes emissions of vehicle emissions and fugitive dust related to vehicular travel

### Summary of Operational Emissions (Winter) (Pounds Per Day)

Operational Activities	VOC	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
Area Source Emissions <sup>a</sup>	54.16	0.62	15.04	0.02	2.04	1.97
Operational Emissions <sup>b</sup>	9.51	16.45	112.57	0.07	13.35	2.62
<b>Peak Day Mass Emissions</b>	<b>63.67</b>	<b>17.07</b>	<b>127.61</b>	<b>0.09</b>	<b>15.39</b>	<b>4.59</b>
SD County Screening Level Thresholds (SLTs)	75	250	550	250	100	55
<b>Significant?</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>

<sup>a</sup> Includes emissions of natural gas, landscape maintenance equipment, and architectural coatings emissions

<sup>b</sup> Includes emissions of vehicle emissions and fugitive dust related to vehicular travel

Source: URBEMIS 2007 v 9.2.4 (See Appendix "E" for more details)



## Summary of Operational Emissions

**Table  
3-3-4**

Year	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
2016	0.00	237.46	237.46	0.06	0.00	238.81
2017	0.00	270.54	270.54	0.06	0.00	271.82
<b>Total</b>						<b>510.63</b>
<b>Yearly Average Construction Emissions (Metric Tons/year over 20 years)</b>						<b>25.53</b>
Expected Construction emissions are based upon CalEEMod modeling assumptions for equipment and durations listed in Table 4.1 above.						

Year	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Area	<u>56.97</u> <u>24.79</u>	<u>0.29</u> <u>10.69</u>	<u>57.26</u> <u>35.48</u>	<u>0.00</u> <u>0.02</u>	<u>0.01</u> <u>0.00</u>	<u>58.83</u> <u>36.57</u>
Energy	<u>0.00</u> <u>0.00</u>	<u>91.30</u> <u>91.30</u>	<u>91.30</u> <u>91.30</u>	<u>0.00</u> <u>0.00</u>	<u>0.00</u> <u>0.00</u>	<u>91.70</u> <u>91.70</u>
Mobile	<u>0.00</u> <u>0.00</u>	<u>463.71</u> <u>463.71</u>	<u>463.71</u> <u>463.71</u>	<u>0.02</u> <u>0.02</u>	<u>0.00</u> <u>0.00</u>	<u>464.08</u> <u>464.08</u>
Waste	<u>5.74</u> <u>5.74</u>	<u>0.00</u> <u>0.00</u>	<u>5.74</u> <u>5.74</u>	<u>0.34</u> <u>0.34</u>	<u>0.00</u> <u>0.00</u>	<u>12.87</u> <u>12.87</u>
Water	<u>0.50</u> <u>0.50</u>	<u>10.23</u> <u>10.23</u>	<u>10.73</u> <u>10.73</u>	<u>0.05</u> <u>0.05</u>	<u>0.00</u> <u>0.00</u>	<u>12.21</u> <u>12.21</u>
<b>Total</b>						<u>639.68</u> <b>617.43</b>
<b>Amortized Construction Emissions (Table 5.1 above)</b>						<u>25.53</u> <b>25.53</b>
<b>Total Operations and Construction</b>						<u>665.22</u> <b>642.96</b>
<b>Sequestered Carbon from Land Use Change</b>						<u>51.72</u>
<b>Total GHG Emissions (CO<sub>2</sub>e)</b>						<u>742.47</u>
Data is presented in decimal format and may have rounding errors. Mobile sources are assumed to <del>travel be rural in nature</del> 30 miles each trip to and from the project site at a rate of 12 trips per dwelling-unit						



### Anticipated Groundwater Needs at Maximum Buildout

Use Type	Current GP Quantities	GP Update Quantities	Water Demand (afy)	Current GP Total Use (afy)	GP Update Total Use (afy)
On-site Residential	24 homes	homes	0.5/acre	12	12
Off-site Residential	192 homes	63 homes	0.5/acre	96	31.5
Offsite Cattle	100 head	100 head	0.016/head	1.6	1.6
Onsite Cattle	80 head	80 head	0.016/head	1.3	1.3
Offsite Orchards	30 acres	30 acres	2.9/acre	87	87
<b>Total</b>				<b>198</b>	<b>133</b>



### Anticipated Groundwater Needs at Maximum Buildout

**Table  
3-5-1**

## CHAPTER 4.0 PROJECT ALTERNATIVES

### **4.1 Rationale for Alternative Selection**

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

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

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

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

### **4.2 No Development Alternative (NDA)**

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

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

## **4.2.1 Analysis of NDA Effects**

### **4.2.1.1 Biology**

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

Cumulative impacts are not significant because the NDA would not significantly impact any sensitive habitat. Impacts are reduced from Proposed Project levels because it has no biological impacts while TM 5312RPL<sup>3</sup> impacts [206.9201.9](#) acres. In summary, NDA's project-level and cumulative biological impacts are not significant, and are reduced from Proposed Project levels.

### **4.2.1.2 Cultural Resources**

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

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

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

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

### **4.2.1.3 Transportation and Traffic**

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

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

#### **4.3 No Project/Legal Lot Alternative (NPLL)**

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

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

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

#### **4.3.1 Analysis of NPLL Effects**

##### **4.3.1.1 Biology**

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

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



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

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

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

#### **4.3.1.2 Cultural Resources**

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

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

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

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

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

#### **4.3.1.3 Transportation and Traffic**

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

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

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

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

#### **4.4 Reduced Project Alternative (RPA)**

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

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

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

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

##### **4.4.1 Analysis of RPA Effects**

###### **4.4.1.1 Biology**

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

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

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

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

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

#### **4.4.1.2 Cultural Resources**

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

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

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

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

#### **4.4.1.3 Transportation and Traffic**

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

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

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

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

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

#### **4.5 Consolidated Project Alternative**

The Consolidated Project Alternative (CPA) proposes 34 lots focused in the eastern and north central part of the site. Figure 4-5-1, "Consolidated Project Alternative," provides the layout for this approach. The south-central and western parts of the site are protected in open space, as shown in Figure 4-5-2, "Consolidated Project Alternative Open Space." The CPA has significant impacts to biology, cultural resources, and traffic. The following effects are not significant: aesthetics, agricultural resources, air quality/global climate change, geology, groundwater, fire, and surface water quality. The agricultural analysis for the CPA, "Agricultural Conversion Analysis for Hoskings Ranch 34-Lot Alternative TM5312RPL<sup>3</sup>Alt", by TRS Consultants, dated January 2013, is provided as Appendix Q. A Stormwater Management Plan (SWMP) and Hydromodification analysis were performed for the CPA, "Technical Appendices Addendum to SWMP for 34-Lot Alternative Major Stormwater Management Plan / Hydro Modification," by Masson & Associates, dated March 13, 2013, is provided as Appendix R to this EIR. A visual study was conducted for the CPA as well, "Visual Resources Impact Report for the Consolidated Project Alternative Hoskings Ranch," by TRS Consultants, dated September 2012, is provided as Appendix S to this ~~DEIR~~FEIR.

The CPA proposes 34 lots on 1,416.5 acres. Total development area is ~~499.9~~194.9 acres, including pads, roads and fire clearing areas. The rest of the site, ~~1,216.9~~1,221.9 acres, or 86 percent, would be retained in protected open space.

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



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

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

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

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

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

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

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

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

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

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

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

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

The CPA includes the following discretionary actions:

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

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

#### **4.5.1 Analysis of CPA Significant Effects**

##### **4.5.1.1 Visual Resources**

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

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

##### Key Views

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

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

*Key Views 1, 2, and 3*

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

*Key Views 1 and 2*

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

The pad for Lot 4 is designed at approximately 20 feet below grade and is approximately 0.3 of a mile from SR 78/79. The line of terrain, as shown on the profile line B<sub>1</sub> to B<sub>3</sub>, from the roadway gradually slopes upward to an elevation approximately 60 feet above the roadway. From there the grade gently levels out to the pad location at a proposed grade which is approximately 30 feet below the sight line from the roadway. Any future incidental structure placed on the pad would be 35 feet or less in height. The dashed line at Lot 4 in the profile view demonstrates the low profile that is potentially in view of the observer on SR 78/79. Any future structure would be in view for approximately 30 seconds at maximum speed and would be screened by landscaping with natural vegetation in harmony with the existing plant communities. Viewer response would be minimal and visual impacts would be below a level of significance.

The pad for Lot 6 is at a proposed elevation of 4,010 feet and is approximately 30 feet below the sight line shown along profile line B<sub>1</sub> to B<sub>3</sub> in the profile view. Any incidental structure on the pad would be a maximum of 35 feet in height, leaving approximately five to seven feet in potential view of the highway. The cut and fill slopes for the pad are located on the east and west sides of the pad and are not in the line of sight. The fill slope is approximately 12 feet at its maximum and the cut slope is approximately 10 feet. Landscaping with natural vegetation that matches existing plant communities would effectively screen any future structures from view. Viewer response would be minimal and visual impacts would be below a level of significance.

The pad for Lot 3 is designed at an elevation of 3,970, requiring approximately 20 feet of cut; the profile line of B<sub>1</sub> to B<sub>2</sub> shows the pad to be approximately 40 feet below the sight line as shown on the profile view of Figure 4-5-6. Viewer response would be minimal and visual impacts would be below a level of significance.

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

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

#### *Key View 3*

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

#### *Key View 4*

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

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

#### *Key View 5*

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

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



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

#### *Key View 6*

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

#### *Key Views 7 and 8*

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

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

#### *Key View 9*

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

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

#### *Key View 10*

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

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

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

#### *Fire Station Location*

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

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

#### Assessment of Visual Character and Visual Quality

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

##### *Assessment of Visual Character*

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

##### *Assessment of Visual Quality*

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

### Assessment of Viewer Response

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

### Determination of Significance

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

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

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

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

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

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

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

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

### Cumulative Impact Analysis

The cumulative boundaries selected for Hoskings Ranch are the limits of the viewshed. Figure 3-1-[1412](#), "Cumulative Projects Map," shows the location of past, present, and reasonably anticipated projects in the area that have been determined to have a visual impact. The listed projects are: MUP 06-016 – cell tower; MUP 92-005 – cell tower; MUP 00-044 – cell tower; and TM 4489 – 41 lot subdivision. Of the

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

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

#### Summary of Project and Significance and Conclusions

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

#### **4.5.1.2 Biology**

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

The CPA impacts approximately ~~199.9~~<sup>194.9</sup> acres. An overview of impacts to habitat areas is provided in Figures 4-~~56-48A~~<sup>16A</sup>, B, and C, "Consolidated Project Alternative Biological Resources – West," "Consolidated Project Alternative Biological Resources – Central," and "Consolidated Project Alternative Biological Resources – East," respectively. The CPA impacts are in contrast to those of the Proposed Project, which impacts ~~206.9~~<sup>201.9</sup> acres.

#### Special Status Species

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

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

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



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

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

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

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

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

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

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

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

The CPA has indirect impacts to species in these categories:

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

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

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

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

*Guideline E: The project would impact Golden Eagle habitat.*

The CPA could directly and indirectly impact Golden Eagle foraging habitats through the development of ~~499.9~~194.9 acres. Nesting habitat is not present onsite. This wide-ranging species is known to forage onsite and nest in the Cleveland National Forest, which adjoins the site. Golden Eagle is declining in San Diego County and is highly sensitive to human activity. Guideline E is exceeded and Impacts are significant. Mitigation is required. (**Impact BI-4**)

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

The CPA would preserve approximately ~~4,246.91~~221.9 acres of potential raptor foraging habitat, which would allow the onsite raptor species to continue to forage on-site. However, the CPA could result in the loss of up to ~~499.9~~194.9 acres of potential foraging habitat for the site's resident and potentially resident species. This loss could potentially result in significant impacts to raptor foraging. Impacts are significant and mitigation is required. (**Impact BI-5**)

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

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

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

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

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

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

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

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

#### Riparian Habitat or Sensitive Natural Communities

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

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

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

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

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

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

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

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



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

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

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

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

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

#### Federal Jurisdictional Wetlands and Waterways

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

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

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

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

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

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

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

#### Wildlife Movement and Nursery Sites

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

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

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

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

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

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

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

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

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

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

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

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

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

#### Local Policies, Ordinances, and Adopted Plans

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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



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

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

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

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

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

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

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

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

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

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

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

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

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

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

#### Cumulative Impacts

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

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

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

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

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

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

#### Summary of Impacts

##### *BI-1*

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

*BI-2, BI-3*

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

*BI-4, BI-5, BI-15*

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

*BI-6, BI-10*

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

*BI-7*

The CPA could impact nesting success of sensitive animals.

*BI-8, BI-9, BI-11*

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

RPO defined sensitive habitats could be impacted by the alternative.

*BI -13*

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

*BI-14*

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

Mitigation

The following mitigation would be required.

*M-BI-1*

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

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

*M-BI-2*

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

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

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

*M-BI-3*

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

*M-BI-4*

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

*M-BI-5*

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



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

*M-BI-6*

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

*M-BI-7*

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

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

*M-BI-8*

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

Comparison of the CPA and the Project

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

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

	CPA	Project
Development Area	<del>199.9</del> 194.9	<del>206.9</del> 201.9
Off-site Impacts	0	0
Open Space	<del>1,216.9</del> 1,221.9	<del>1,209.8</del> 1,214.8
Impact Neutral Open Space	274.3	281.9

#### Summary

An assessment of the biological impact of the CPA indicates the project would impact ~~199.9~~194.9 acres of habitat directly, and would also have indirect impacts associated with construction and an increased human presence on the site. A range of mitigation measures would be required which focus on creating a protected and managed open space area. Approximately ~~1,216.9~~1,221.9 acres would be set aside onsite to protect habitat for a range of species, including Golden Eagle. Wetland creation and restoration at an overall 3-to-1 ratio is called for to mitigate impacts to this sensitive habitat. The CPA has similar impacts to biology when compared to the proposed project. The CPA's proposed mitigation reduces all impacts to below a level of significance. No further mitigation is necessary.

#### **4.5.1.3 Cultural Resources**

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

#### Historical and Archaeological Resources

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

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

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

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

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

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

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

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

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

### Cumulative Impacts

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

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

### Summary of Impacts

#### *CR-1*

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

#### *CR-2*

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

### Mitigation

#### *M-CR-1*

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

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



## *M-CR-2*

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

### Comparison of CPA and Proposed Project

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

### Summary

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

#### **4.5.1.4      *Transportation and Traffic***

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

### Intersection and Road Segments

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

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

### Sight Distance

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

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

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

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

#### Corner Sight Distance

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

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

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

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

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

#### Stopping Sight Distance

All movements were determined to have adequate stopping sight distance.

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

#### Cumulative Impacts

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

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

### Summary of Impacts

#### *TR-1*

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

### Mitigation

#### *M-TR-1*

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

### Comparison of CPA and Proposed Project

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

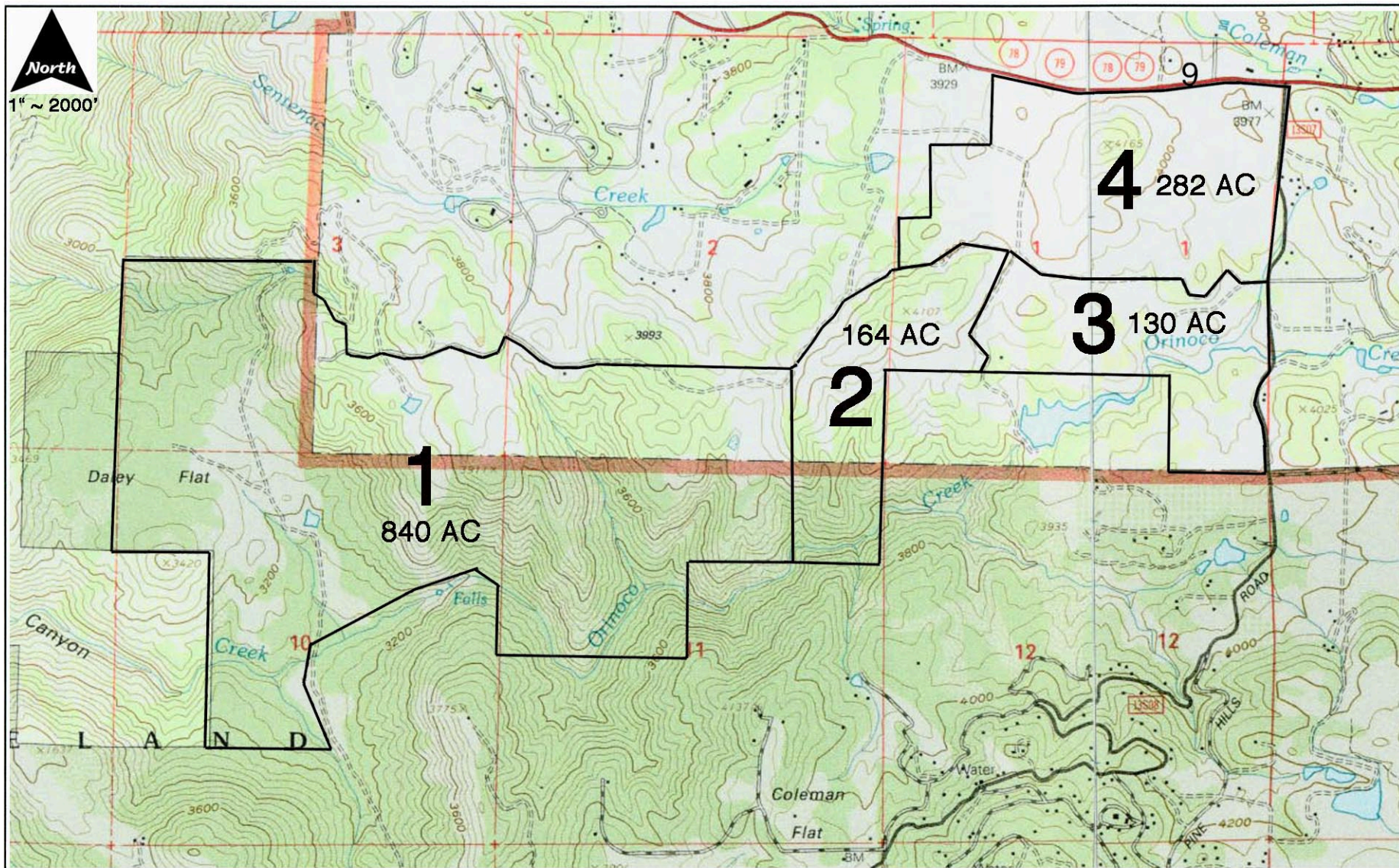
### Summary

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

## **4.6 Environmentally Superior Alternative**

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





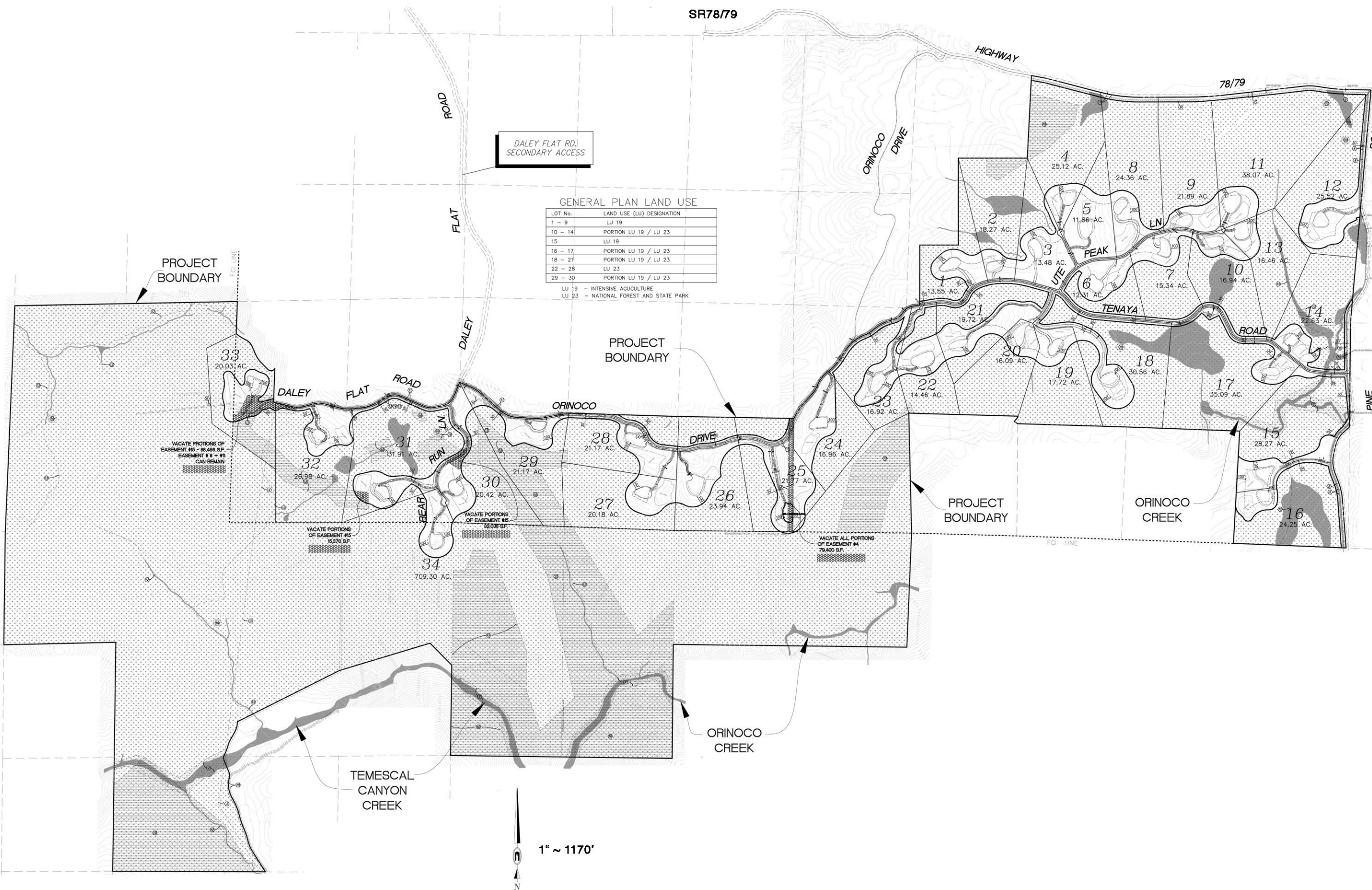
**Figure  
4-3-1**

**No Project Legal Lot Alternative**

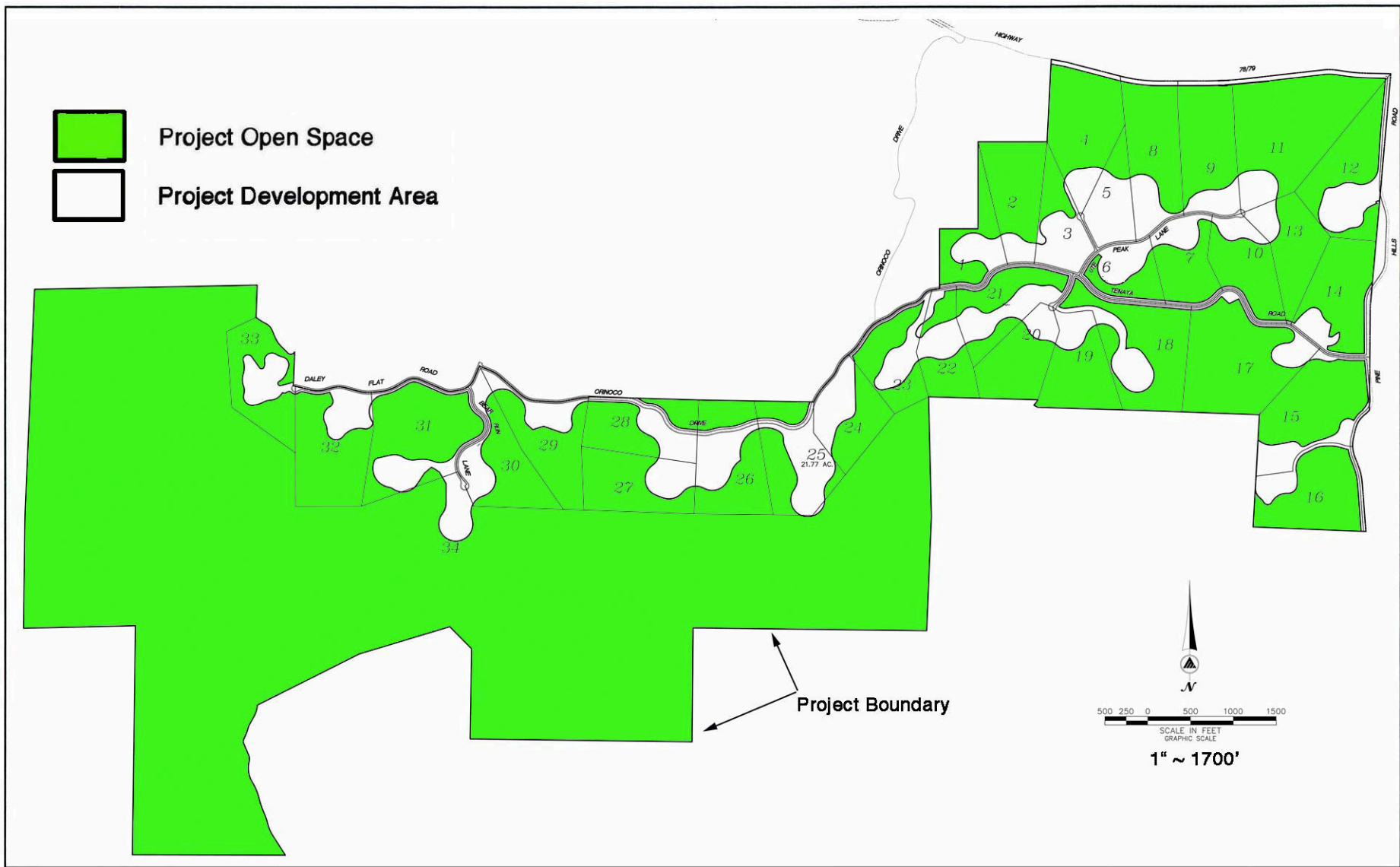






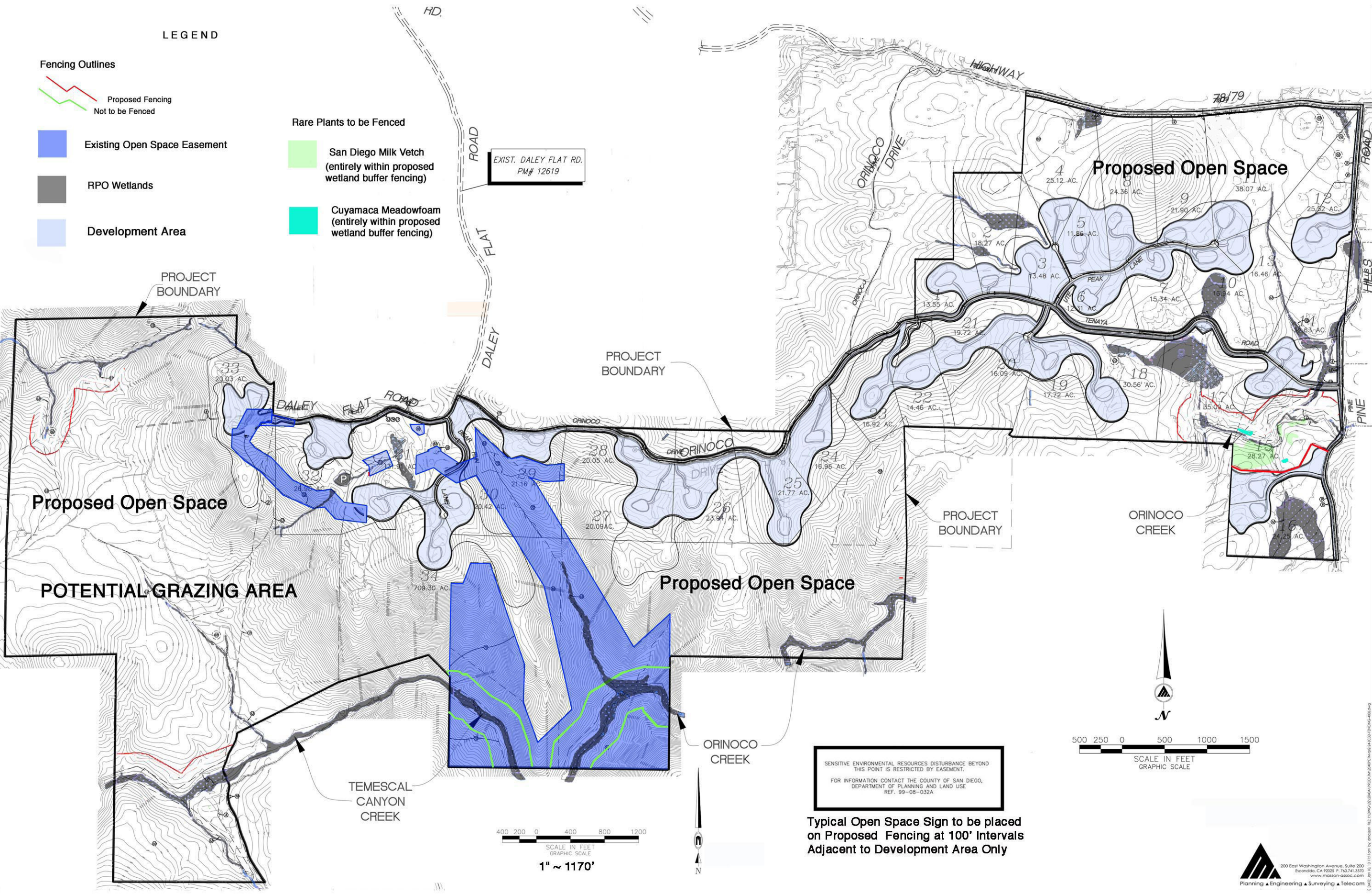




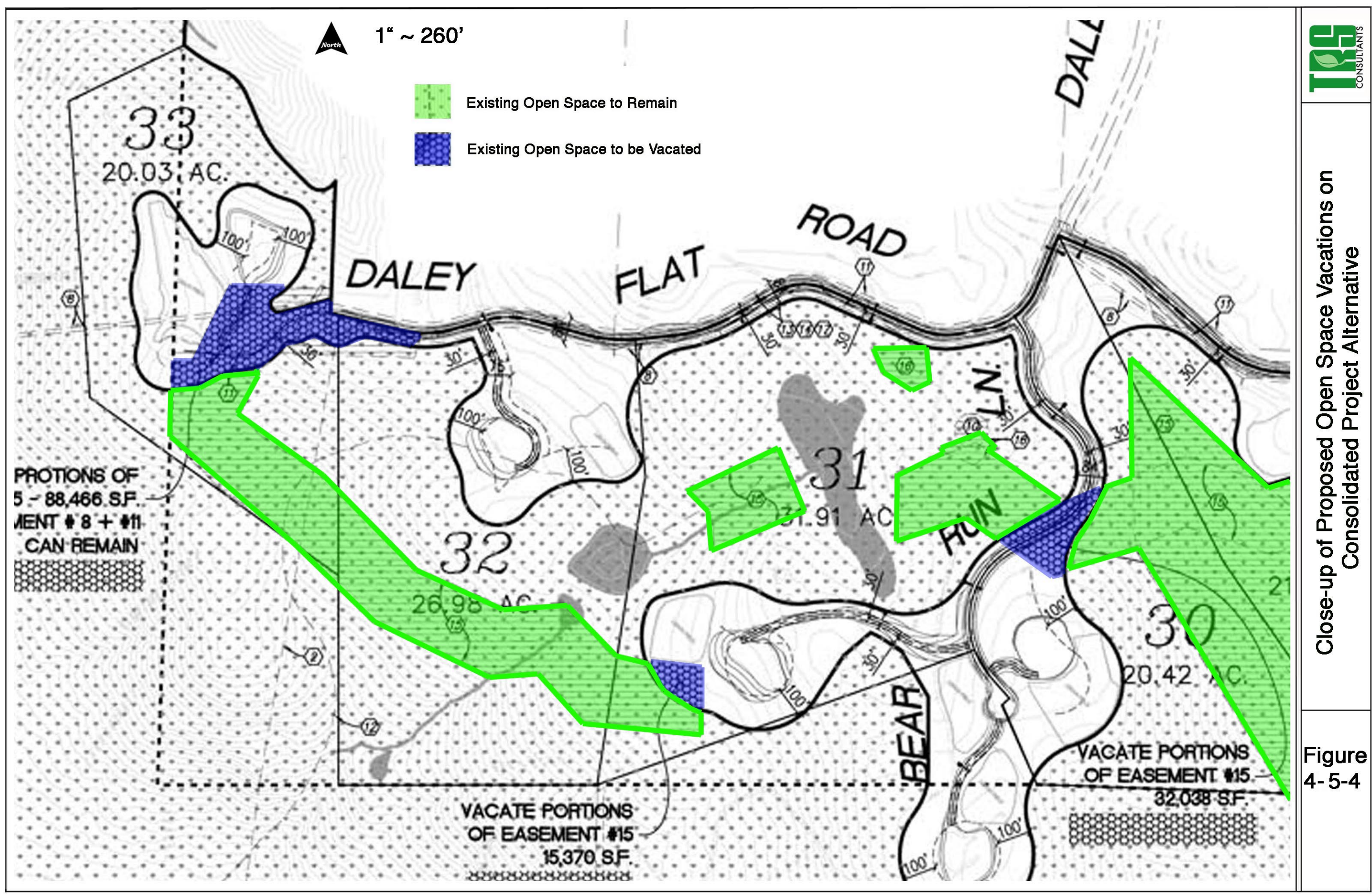


Consolidated Project Alternative Open Space

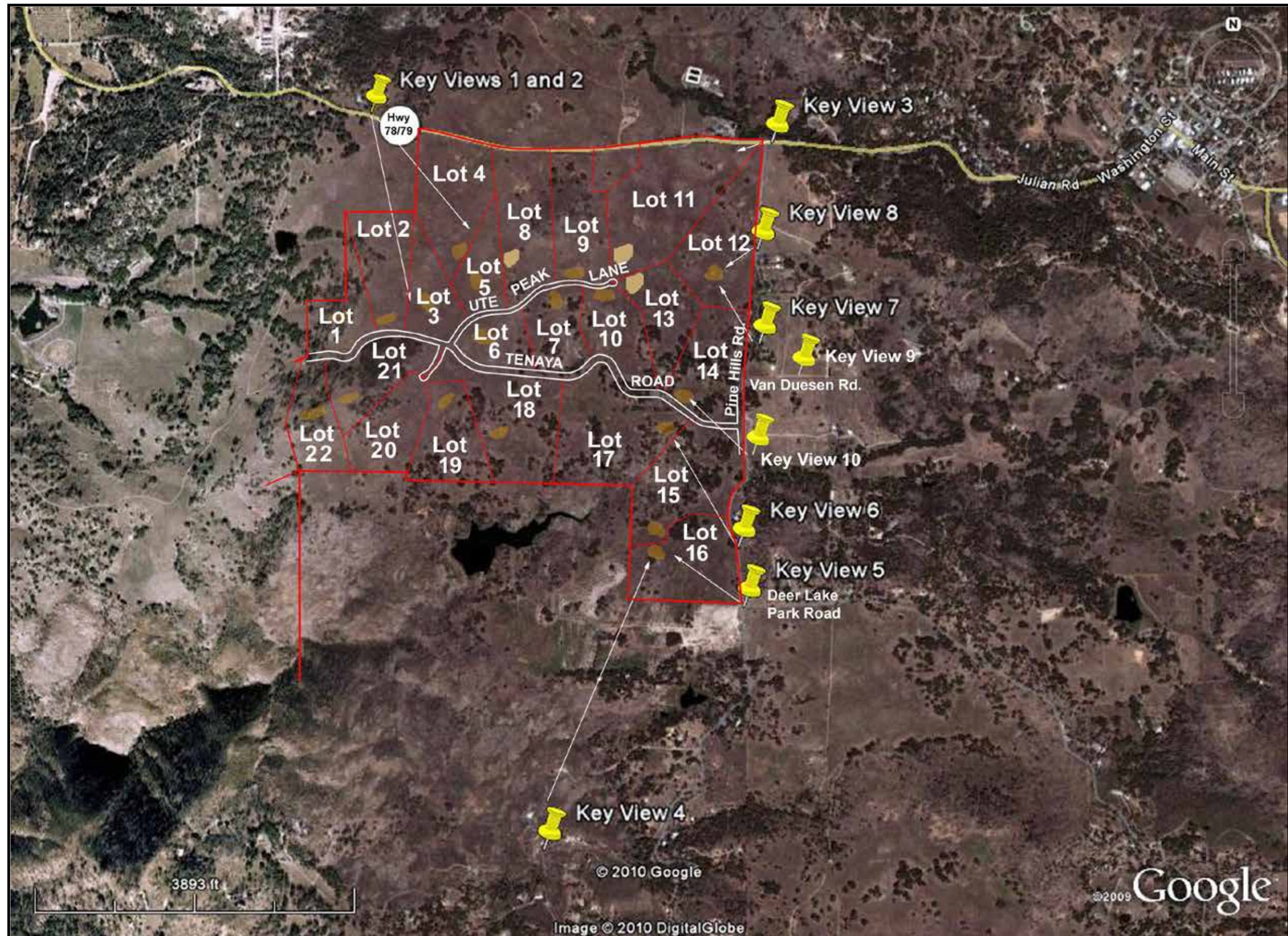








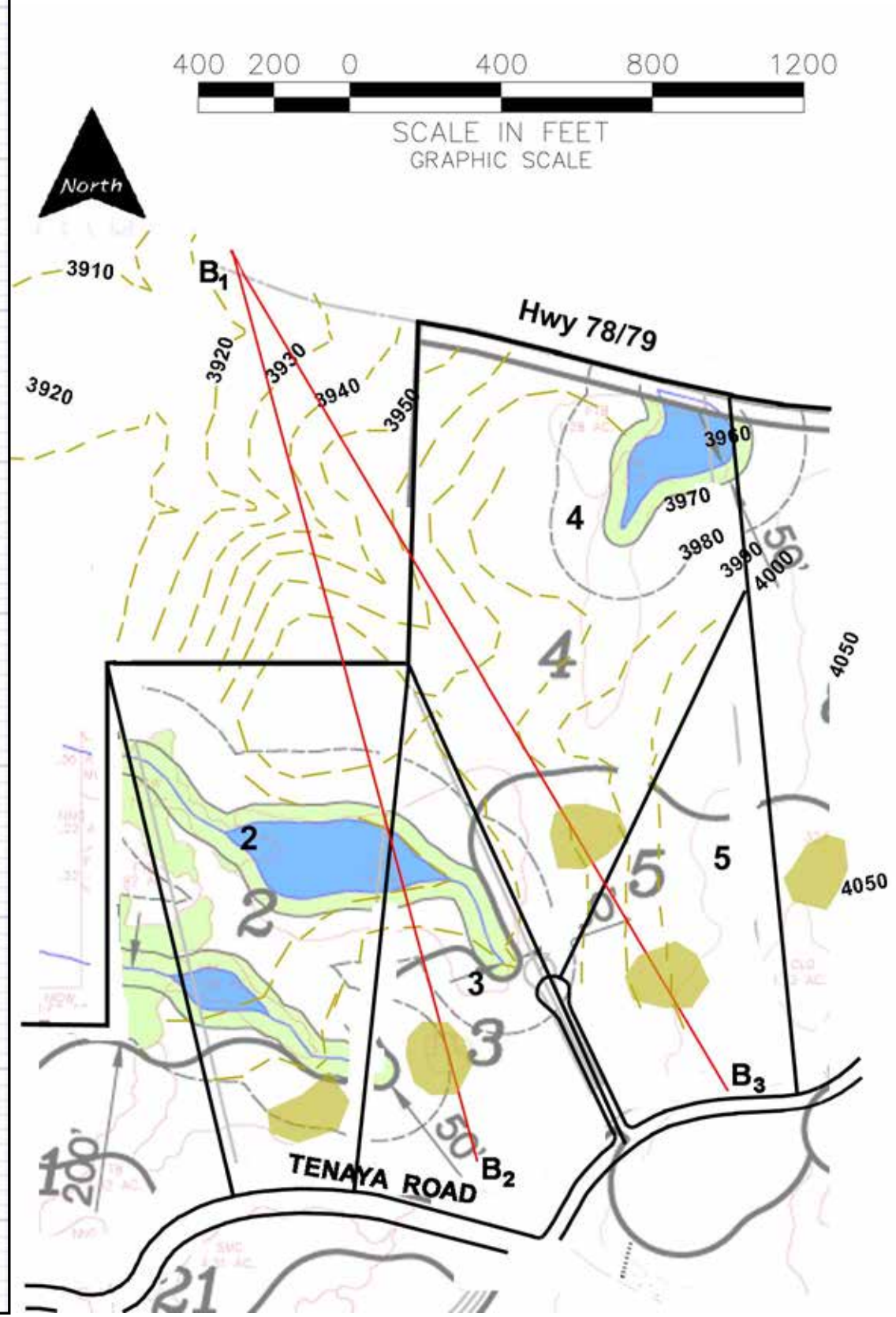
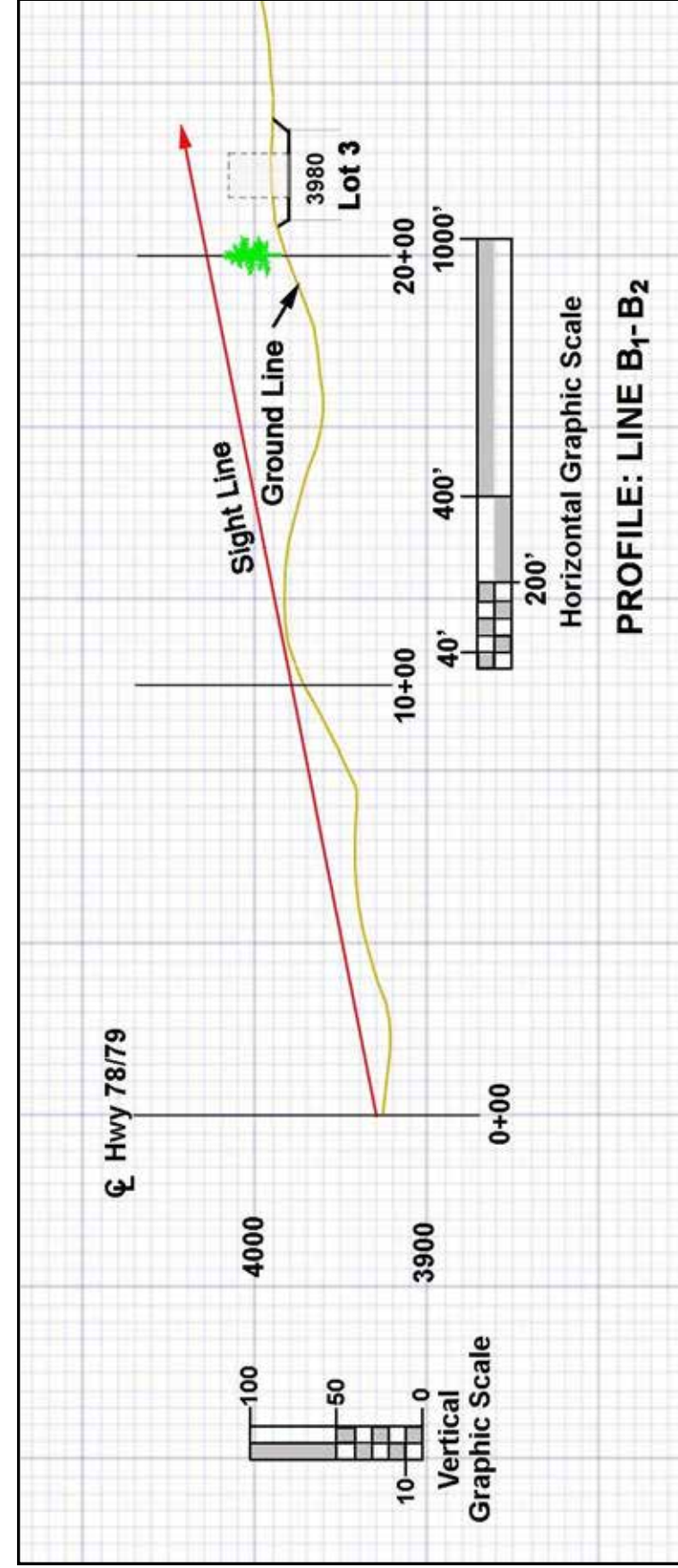
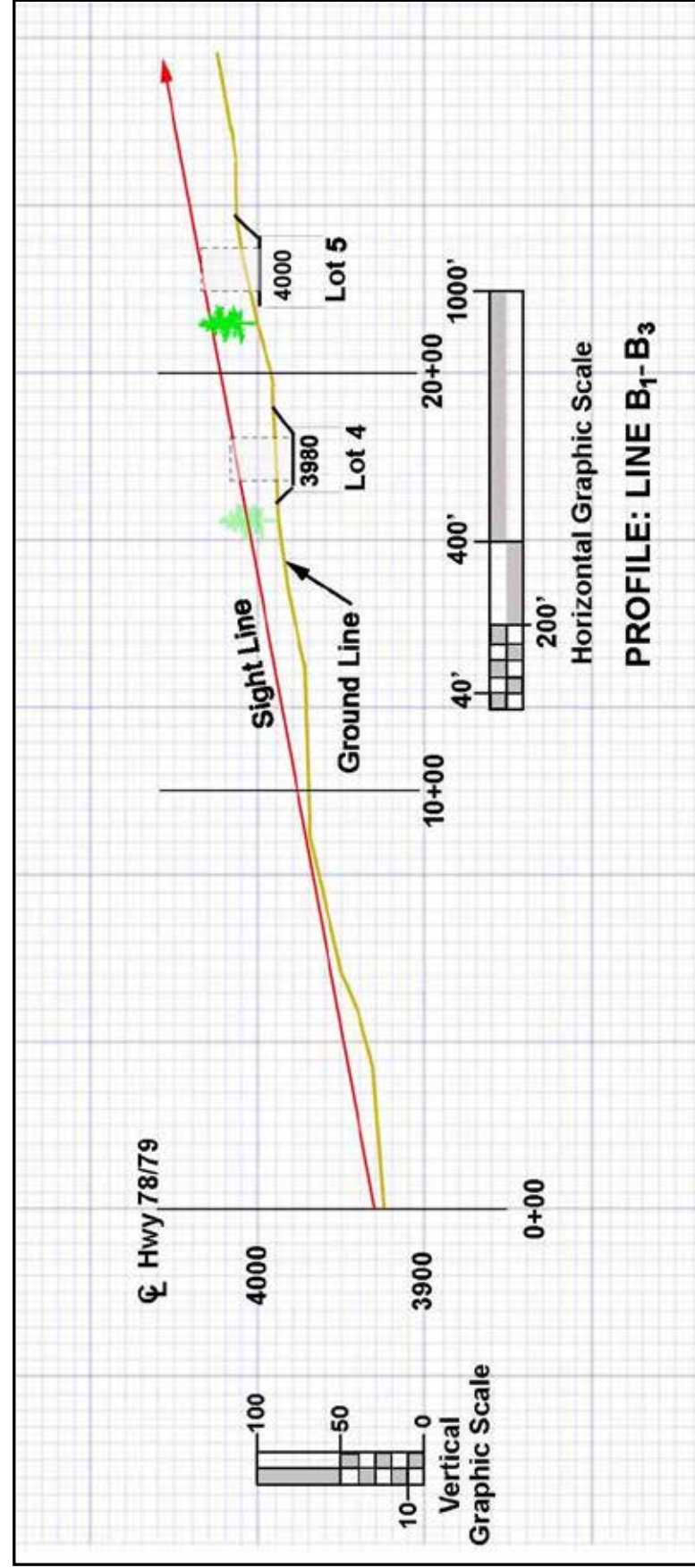




KEY VIEW  
Index

Figure  
4-5-5

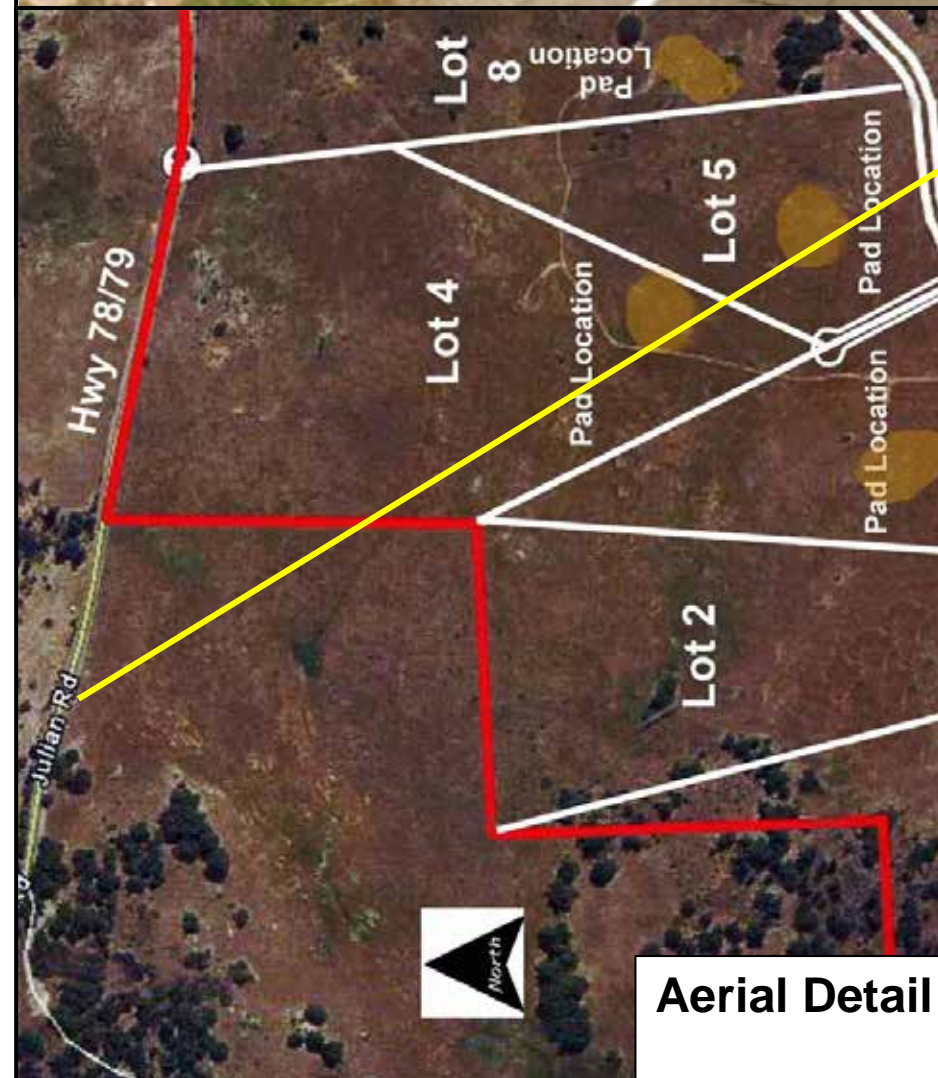
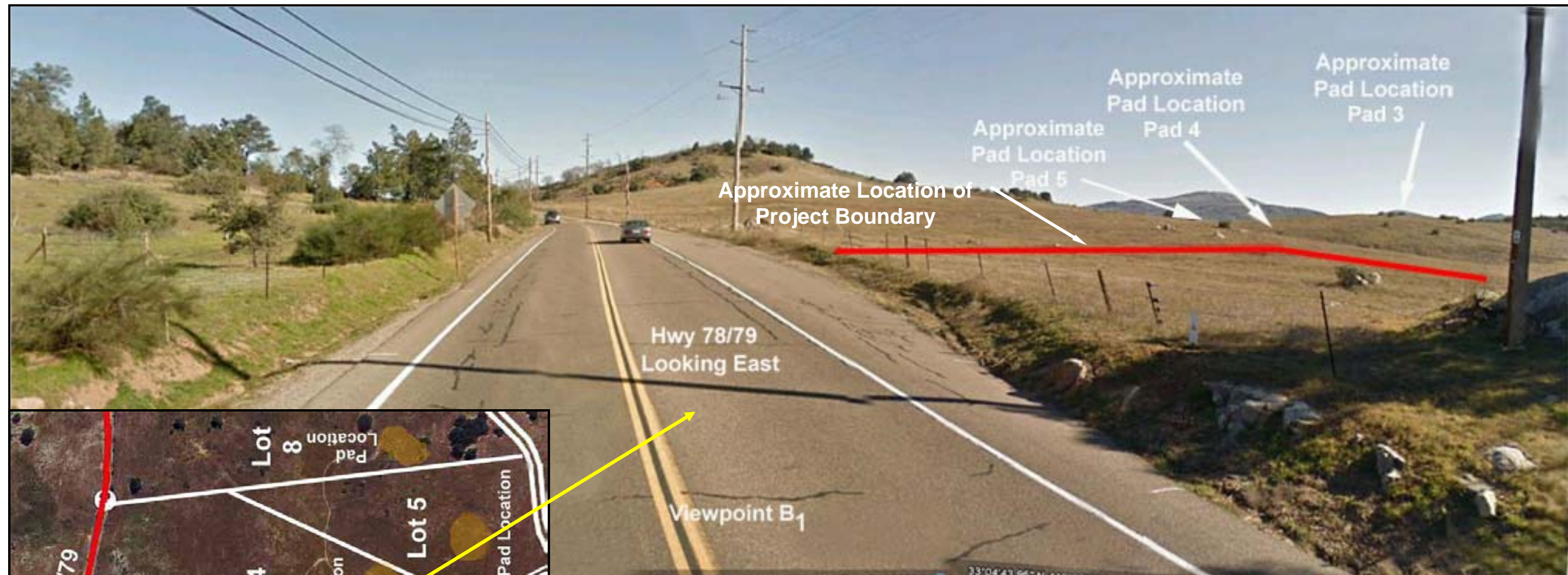




KEY VIEWS 1 and 2  
 SR 78/79  
 Plan and Profile, Looking East

Figure  
 4-5-6





Aerial Detail of pad relationship to Hwy 78/79





#### Upper View

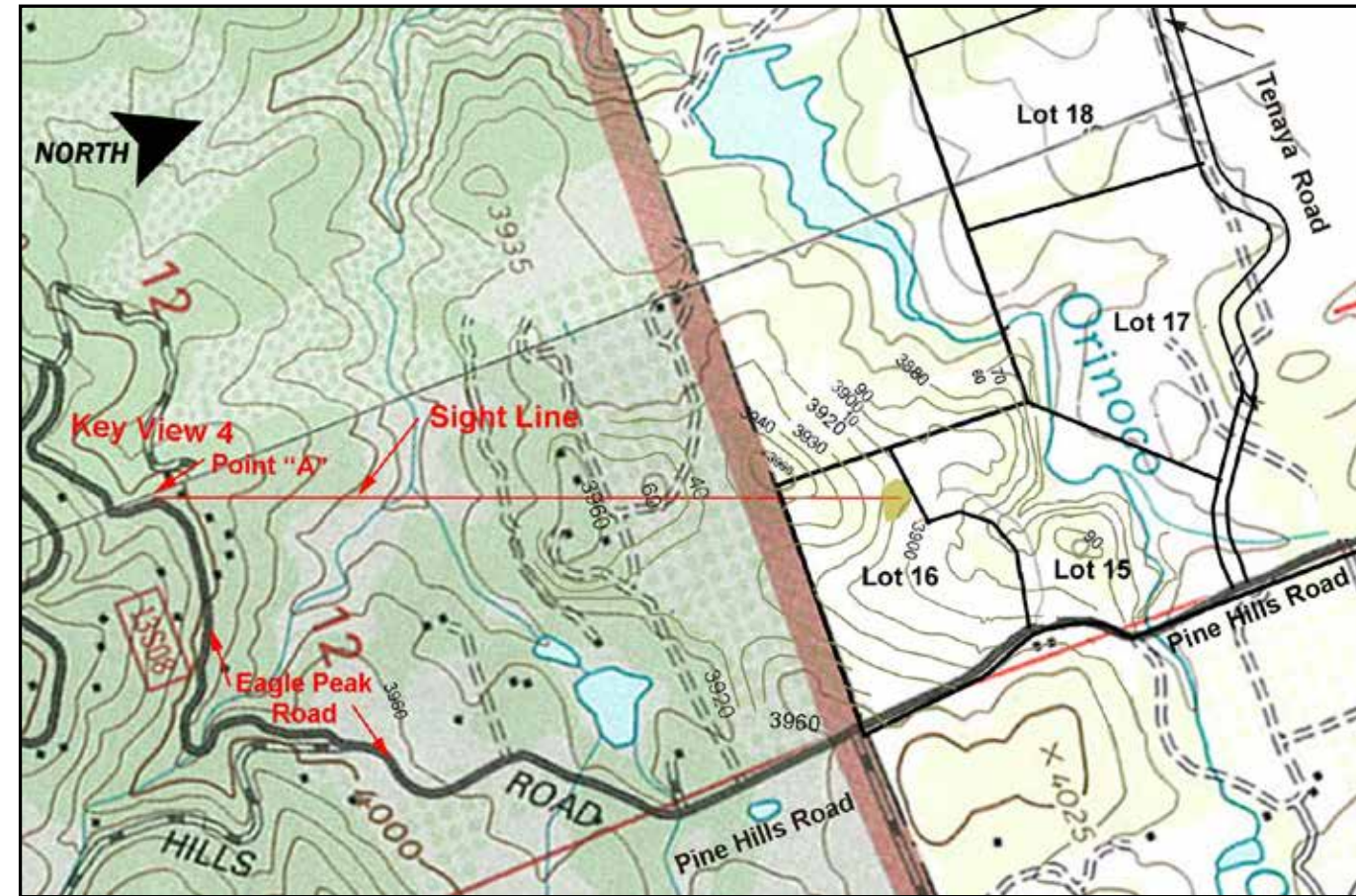
The perspective is that of travelers approaching the site from the east, looking to the west.

#### Lower View

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

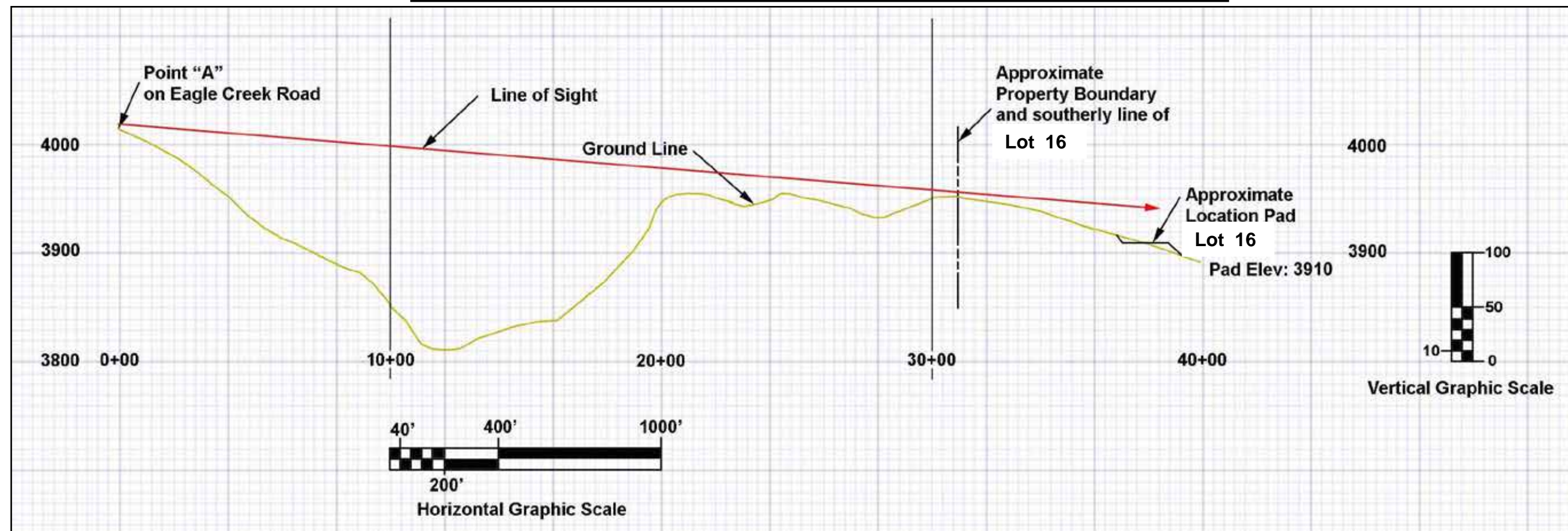






Datum is from USGS Mapping.

See Figure 11 for photosimulation of the view.



**KEY VIEW 4**  
**Looking North from Pine Hills**  
**Residential Area**

**Figure**  
**4-5-9**



**KEY VIEW 4**  
Photosimulation

**Figure**  
**4-5-10**





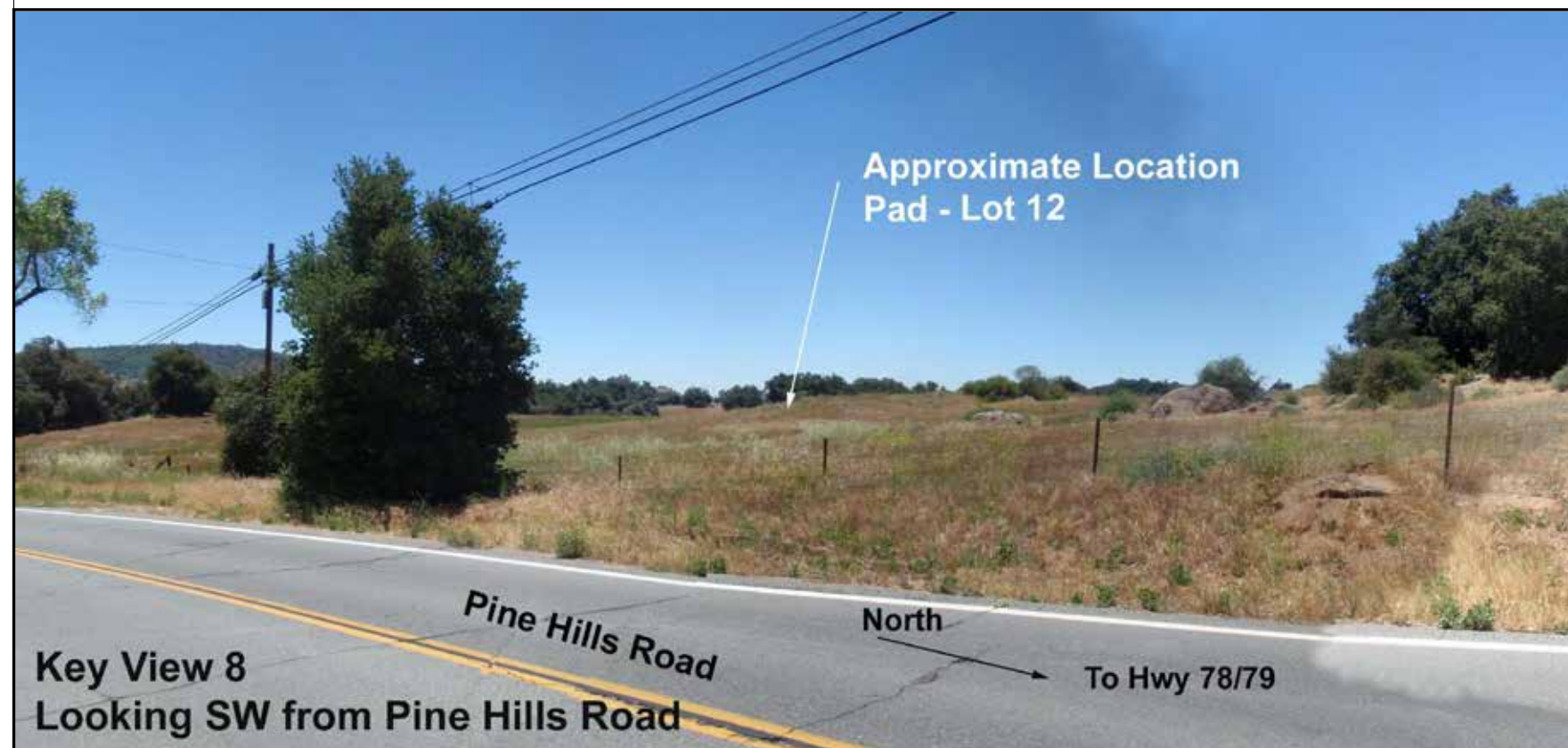
**KEY VIEW 5**  
**From Southeast Corner of Project**  
**Deer Lake Park Rd. at Pine Hills Rd.**





**KEY VIEW 6**  
Looking Northwest from Pine Hills Road



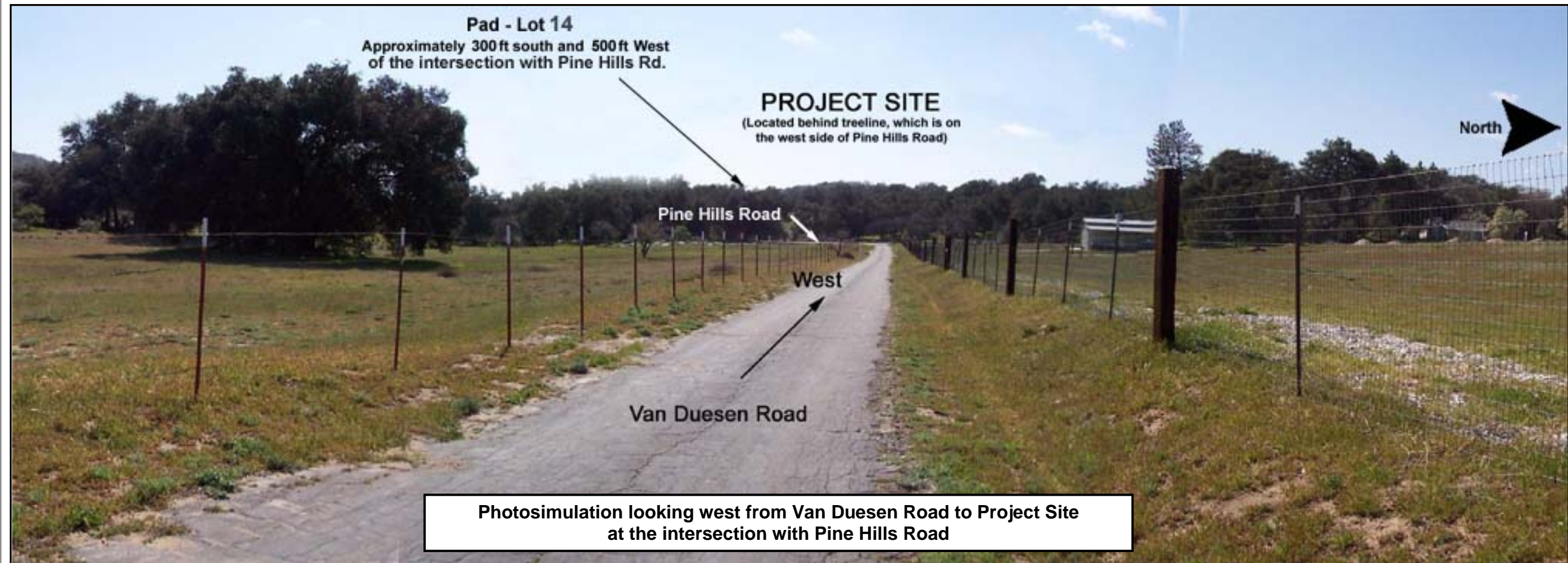


Detail of Key View Locations



Key View 7 and Key View 8  
From Pine Hills Road

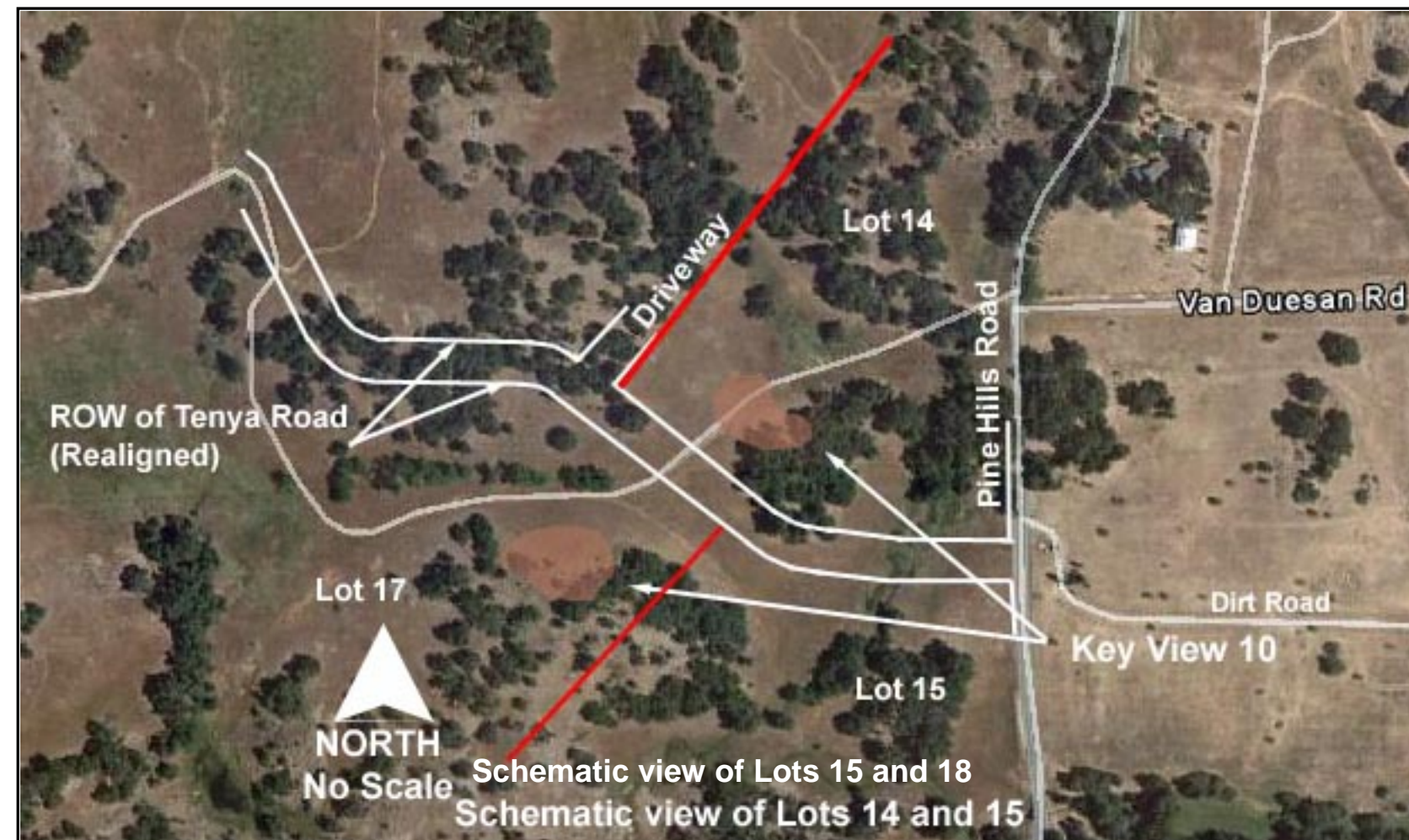




**KEY VIEW 9**  
Looking West from Van Duesen Road

**Figure**  
**4-5-14**





Key View 10  
Looking North on Pine Hills Rd.

Figure  
4-5-15



SEE FIGURE 4.5-18B

SEE FIGURE 4.5-18B

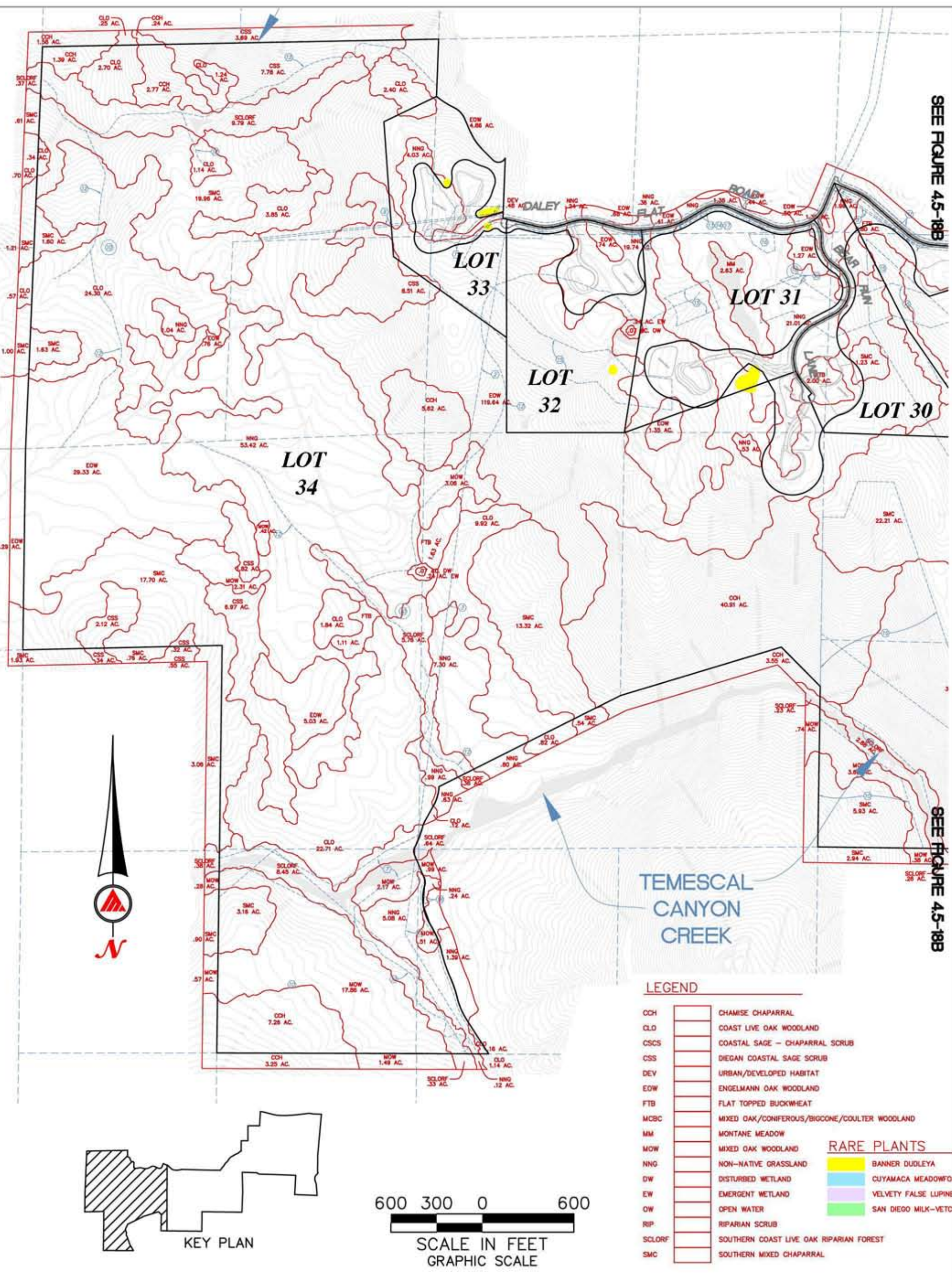
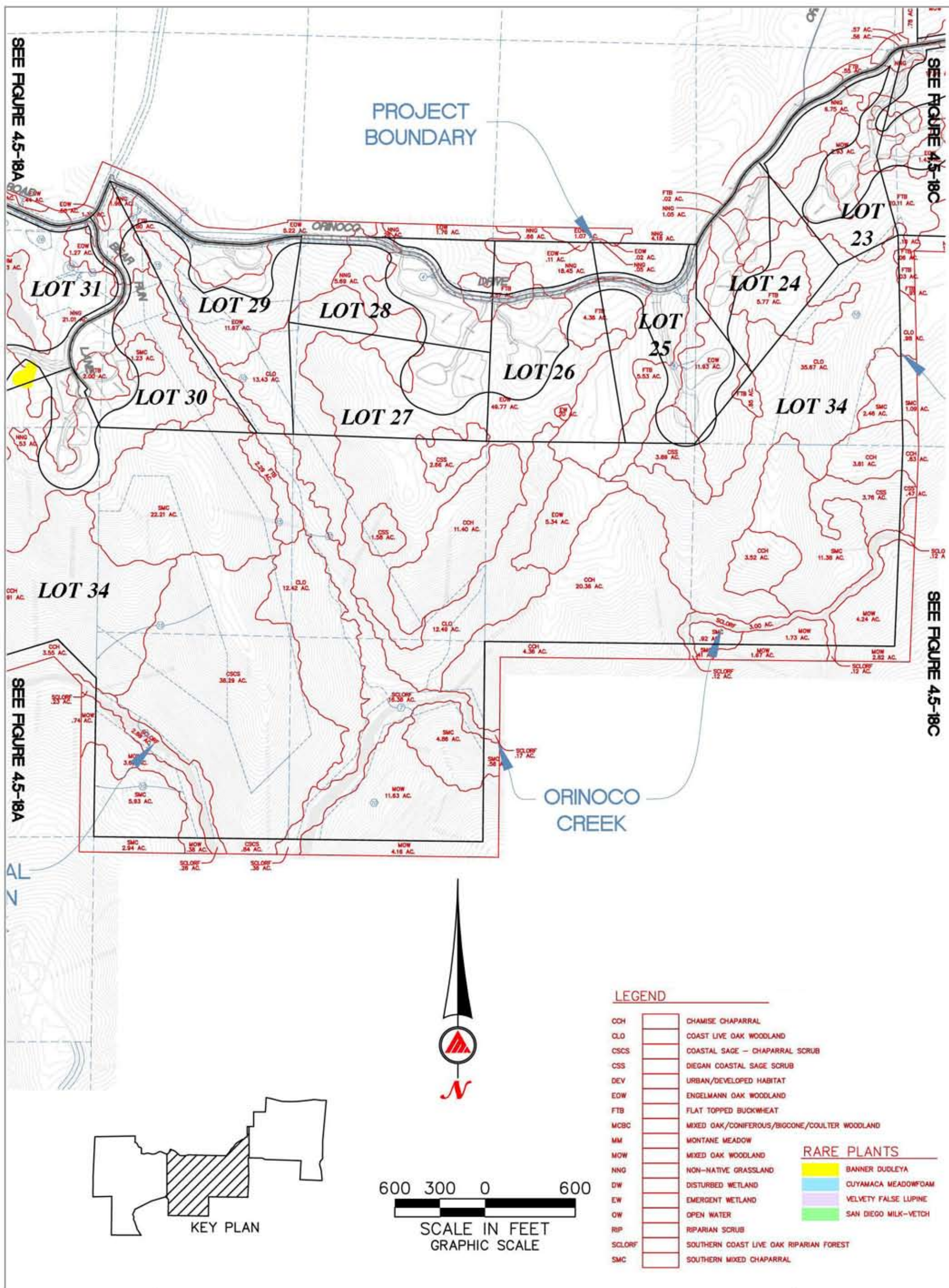


FIGURE 4-5-18A

CONSOLIDATED PROJECT ALTERNATIVE  
BIOLOGICAL RESOURCES - WEST









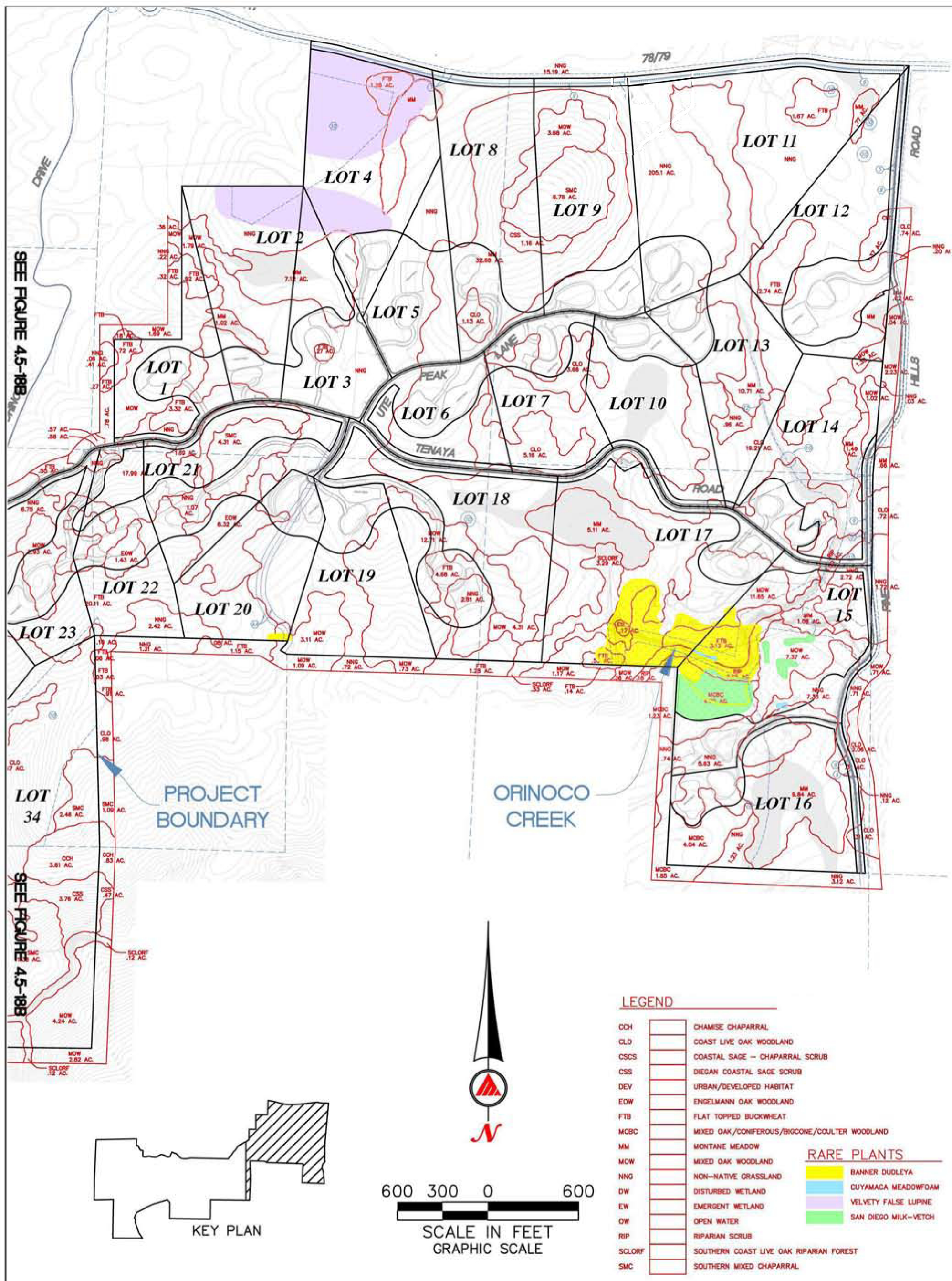


FIGURE 4-5-18C

CONSOLIDATED PROJECT ALTERNATIVE BIOLOGICAL RESOURCES MAP - EAST







**Figure  
4-5-19**

## Consolidated Project Alternative - RPO Encroachments



### Biological Impact Table – Consolidated Project Alternative

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



**Biological Impact Table –  
Consolidated Project Alternative**

**Table  
4-2-1**

### Existing Roadway Segment Conditions – Consolidated Project Alternative

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

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

### Existing Intersection Conditions – Consolidated Project Alternative

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

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

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



## Traffic Analysis Summary

**Table  
4-2-3**

## CHAPTER 5.0 REFERENCES

Aerial Fotobank. October 12, 1992. Color aerial photographs CVSD92-9M, 9N. San Diego County, California.

American Lung Association. Fact Sheet: Air Quality and Health Impacts of Greenhouse Gas Emissions and Global Warming. 2004.

An American Lower Paleolithic, 1978. *Anthropological Journal of Canada* 16:2-38.

*Ancient Hunters of the Far West*, 1966. Union-Tribune Publishing Company, San Diego.

ARB (1994). ARB memorandum dated 4/11/94 from A. Ranzieri to J. Brooks on the subject, "One-hour to Thirty-day Average Screening Factor."

ARB (2002). Staff Report: Initial Statement of Reasons for the Proposed Airborne Toxic Control Measure to Reduce Emissions of Toxic Air Contaminants from Outdoor Residential Waste Burning, January 2002. California Air Resources Board.

*Archaeological Differentiation of Shoshonean and Yuman Speaking Groups in Southern California*, 1966. Doctoral dissertation, Department of Anthropology, University of California, Los Angeles.

Banks, Thomas Archaeological Survey Report. TPM 15951, EAD Log # 79-10-6. In Extended Initial Study Hoskings Ranch Archaeological and Biological Survey Reports TPM 15951, EAD Log #s 79-10-6, Wynola, California. Advance Planning and Research Associates, San Diego. Report submitted to County of San Diego Department of Land Use and Environmental Regulation. Report on file at South Coastal Information Center, San Diego State University.

Board of Supervisors' Policy I-38, Adopted September 11, 1998, last amended September 25, 2012.

Bocek, Barbara, 1986. Rodent Ecology and Burrowing Behavior: Predicted Effects on Archaeological Site Formation. *American Antiquity* 51:589-603.

Botts, Myrtle, *History of Julian*. Julian Historical Society.

Bull, Charles S., 1983. Shaking the Foundations: The Evidence for San Diego Prehistory. *Casual Papers: Cultural Resource Management* 1(3):15-64. Cultural Resource Management Center, San Diego State University, San Diego.

Burt, W.H. and R.P. Grossenheider. A field guide to the mammals. Houghton-Mifflin Company, 1966. 249p.

California Air Pollution Control Officers Association. *CEQA & Climate Change*. January 2008.

California Air Resources Board, 2006. Air Resources Board Almanac.

California Air Resources Board, 2006. Emfac2007 (Version 2.3) – Calculating Emission Inventories for Vehicles in California.

California Air Resources Board, 2004. Technical Support document for Staff Proposal Regarding Reduction of Greenhouse Gas Emissions from Motor Vehicles.

California Air Resources Board: Estimates of Nitrous Oxide Emissions from Motor Vehicles and the Effects of Catalyst Composition and Aging, 2005.

California Department of Conservation, 1992. Geologic Map of California - Santa Ana Sheet. Scale 1:250,000.

California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program, San Diego County Important Farmland 2002 Map.

California Department of Fish and Game, 1990. Designated endangered or rare plants. Summary list from Section 1904, Fish and Game Code, State of California Resources Agency, Sacramento.

California Department of Fish and Game, 1990. Endangered, rare or threatened animals of California. Summary list from Section 1904, Fish and Game Code, State of California Resources Agency, Sacramento.

California Department of Transportation (Caltrans). November 1, 2002. Highway Design Manual. Fifth Edition.

California Department of Water Resources. Crop Water Use in California. Bulletin 113-4. April 1986.

California Department of Water Resources. Cuyamaca East – SDCWC Evaporation Data. November 1979. Evaporation from Water Surfaces in California. Bulletin 73-79. Pg. 148.

California Division of Mines and Geology. 1992. Geologic Map of California - Santa Ana Sheet. Scale 1:250,000.

California Environmental Protection Agency. Climate Action Team Report to Governor Schwarzenegger and the Legislature. March 2006.

California Geological Survey. 2003. Alquist-Priolo Earthquake Fault Zones. Web site <http://www.consrv.ca.gov/CGS/rghm/ap/>.

Cárdenas, D. Seán, and Mary Robbins-Wade, 1985. *An Archaeological Investigation of SDM-W-143/146: An Unique Coastal Luiseño Occupation Site in Carlsbad, California*. RBR & Associates, Inc., San Diego. Report submitted to City of



Carlsbad, Planning Department. Report on file at South Coastal Information Center, San Diego State University.

Cárdenas, D. Seán, and Stephen R. Van Wormer, 1984. *Archaeological Investigation of SDI-4648 and SDM-W-348*. RBR & Associates, Inc., San Diego. Report submitted to City of El Cajon, Planning Department. Report on file at South Coastal Information Center, San Diego State University.

Carrico, Richard L., 1987. Sixty-five Years of San Diego County Archaeology. In *San Dieguito-La Jolla: Chronology and Controversy*, edited by Dennis Gallegos, pp. 1-14. San Diego County Archaeological Society, Research Paper 1.

Carter, George F., 1957. *Pleistocene Man at San Diego*. Johns Hopkins Press, Baltimore.

Childers, W. Morlin, 1974. Preliminary Report on the Yuha Burial, California. *Anthropological Journal of Canada* 12 (1):2-9.

Christenson, Lynne E., 1990. *The Late Prehistoric Yuman People of San Diego County, California: Their Settlement and Subsistence System*. Ph.D. dissertation, Department of Anthropology, Arizona State University, Tempe. University Microfilms, Ann Arbor.

City of Oceanside, California, 1995. Vegetation Management. Landscape Development Manual. Community Services Department, Engineering Division.

City of Vista, California, 1997. Undesirable Plants. Section 18.56.999. Landscaping Design, Development and Maintenance Standards.

Coastal Luiseño: Refining the San Luis Rey Complex, 1988. *Proceedings of the Society for California Archaeology, Fresno, California* 1:75-95. Society for California Archaeology, San Diego.

[Collar, C. et al. Dairy and Livestock Research Report. California Daily Energy Project, Not Dates.](#)

Cook, John R., 1985. *An Investigation of the San Dieguito Quarries and Workshops Near Rancho Santa Fe, California*. Mooney-Lettieri and Associates, San Diego. Report submitted to County of San Diego, Department of Planning and Development Services. Report on file at South Coastal Information Center, San Diego State University.

Cooper, H.H., Jr. and C.E. Jacobs. 1946. A Generalized Graphical Method for Evaluating Formation Constants and Summarizing Well Field History. *Transactions, American Geophysical Union* 27:526-34.

County of Los Angeles Fire Department, 1998. Fuel Modification Plan Guidelines. Appendix I, Undesirable Plant List, and Appendix II, Undesirable Plant List.

County of San Diego. 1991a. Average Annual Precipitation. San Diego County, California.

County of San Diego. 2004. 30-year Average Rainfall Data (*Excel File*). San Diego County, California.

County of San Diego Department of Agriculture, Weights and Measures. 2010

County of San Diego Department of Agriculture, Weights and Measures. 2005

County of San Diego, Department of Public Works. 1994. Faults and Epicenters Map. Scale 1:125,000.

County of San Diego, Department of Public Works. 2004. Groundwater Limitations Map. Scale 1:250,000.

County of San Diego. Amended January 31, 2007. San Diego County Groundwater Ordinance Number 7994. Sections 67.701 through 67.750.

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

County of San Diego Guidelines for Determining Significance. Cultural Resources: Archaeological and Historic Resources. County of San Diego, Land Use and Environment Group, Department of Planning and Development Services, Department of Public Works, December 5, 2007.

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

County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements Visual Resources, July 20, 2007.

County of San Diego, Revised January 1985. Hydrology Manual.

County of San Diego, Land Use and Environment Group. 2007a. Guidelines for Determining Significance. Geologic Hazards. San Diego County, California.

County of San Diego, Land Use and Environment Group. 2007b. Guidelines for Determining Significance. Unique Geology. San Diego County, California.

County of San Diego. Landslides Map No. 14.

County of San Diego. 2008. Rainfall Data for Hoskings Ranch. *Modified from Cuyamaca, Wynola, and Santa Ysabel Rainfall Stations*. San Diego County, California.

County of San Diego, October 1991. San Diego County Groundwater Ordinance Number 7994. Sections 67.701 through 67.750.

Crop Statistics & Annual Report, Department of Agriculture, Weights & Measures, 2007, 2008.

Cultural Tradition and Ecological Adaptation on the Southern California Coast, 1968. In *Archaic Prehistory in the Western United States*, edited by C. Irwin-Williams. *Eastern New Mexico Contributions in Anthropology* 1 (3):1-14.

Davis, E.L., 1968. Early Man in the Mojave Desert. *Eastern New Mexico University Contributions in Anthropology* 1 (4):42-47.

De Barros, Philip, Cultural Resources Survey and Assessment of 1,416.5 Acres of the Hoskings Ranch South of State Highway 78/79 Near Julian San Diego County, California. TM 5312. ER# 03-10-006. Professional Archaeological Services, San Diego. Report on file at South Coastal Information Center, San Diego State University.

Demand Response Research Center, 2006. Water Supply Related Electricity Demand in California.

Discretionary Projects Layer (GIS) County of San Diego DPS.  
Donnelly, Maurice. January 1934. Geology and Mineral Deposits of the Julian District, San Diego County, California. *California Journal of Mines and Geology*. Vol. 30. Pgs. 332-370.

Earlier Than You Think: A Personal View of Man in America, 1980. Texas A&M University Press, College Station.

Earth Tech. 2005. Hydrogeologic Investigation, 1,416.5-Acre Hoskings Ranch, Julian, San Diego County, California.

Erlandson, Jon M., 1984. A Case Study in Faunalurbation: Delineating the Effects of the Burrowing Pocket Gopher on the Distribution of Archaeological Materials. *American Antiquity* 49:785-790.

Gallegos, Dennis, 1987. A Review and Synthesis of Environmental and Cultural Material for the Batiquitos Lagoon Region. In *San Dieguito-La Jolla: Chronology and Controversy*, edited by Dennis Gallegos, pp. 23-34. San Diego County Archaeological Society, Research Paper 1.

Gallegos, Dennis R., and Ivan H. Strudwick, *Historical/Archaeological Survey Report for the Julian Water Pollution Control Facility, Julian, California*. Gallegos & Associates, Carlsbad, CA. Report on file at South Coastal Information Center, San Diego State University.

Garbage About the Foundations: A Comment on Bull's Assertions, 1985. *Casual Papers: Cultural Resource Management* 2(1):82-90.

Google Earth – aerial views, 2010 - 2013.

Gordon, H White, TC, 1994. Ecological Guide to Southern California Chaparral Plant Series. Cleveland National Forest.

Governor's Office of Planning and Research. CEQA and Climate Change: Addressing Climate Change Through CEQA Review. June 19, 2008.

Griner, E. Lee, and Philip R. Pryde, 1976. Climate, Soils, and Vegetation. In *San Diego: An Introduction to the Region*, edited by Philip R. Pryde, pp. 29-46. 4th edition. Kendall/Hunt Publishing Company, Dubuque, Iowa.

Gross, G. Timothy, 1992. Site Formation and Transformation Processes in Coastal Shell Middens and Shell-Rich Sites. In *Essays on the Prehistory of Maritime California*, edited by Terry L. Jones, pp. 195-204. Center for Archaeological Research at Davis Publications 10, University of California, Davis.

Gross, G. Timothy, and John A. Hildebrand  
1998 San Dieguito and La Jolla: Insights from the 1964 Excavations at the C.W. Harris Site. Paper presented at the 32nd Annual Meeting of the Society for California Archaeology, San Diego.

Gross, G. Timothy, and Mary Robbins-Wade, 1989. *Archaeological Investigation of SDi-9772 (SDM-W-3411) San Marcos, California*. Affinis, El Cajon. Report submitted to County of San Diego, Department of Planning and Development Services. Report on file at South Coastal Information Center, San Diego State University.

Hedges, Ken, and Christina Beresford, 1986 *Santa Ysabel Ethnobotany*. San Diego Museum of Man Ethnic Technology Notes No. 20.

Holland, R.F, 1996. Preliminary descriptions of the terrestrial natural communities of California. State of California, Nongame-Heritage Program. 156p (amended).

*Investigation of a Late Prehistoric Complex in Cuyamaca Rancho State Park, San Diego County, California*, 1970. University of California, Los Angeles, Archaeological Survey Monographs I. University of California, Los Angeles.

Jameson, E.W., and H.J. Peeters, 1988. California Mammals. California Natural History Guides: 52. Univ. Calif. Press, Berkeley, CA.

Jennings, Charles W. 1994. Fault Activity Map of California and Adjacent Areas with Location and Ages of Recent Volcanic Eruptions. California Geologic Data Map Series, Map No. 6. California Division of Mines and Geology.



- Johnson, Donald L., 1989. Subsurface Stone Lines, Stone Zones, Artifact-Manuport Layers, and Biomantles Produced by Bioturbation Via Pocket Gophers (*Thomomys bottae*). *American Antiquity* 54:370-389.
- Kaldenberg, Russell L., 1976. *Paleo-technological Change at Rancho Park North, San Diego County, California*. Unpublished Master's thesis, Department of Anthropology, San Diego State University.
- Luomala, Katherine, 1978. Tipai-Ipai. In *California*, edited by Robert F. Heizer, pp. 592-609. *The Handbook of North American Indians*, vol. 8., William C. Sturtevant, general editor. Smithsonian Institution, Washington, D.C.
- Masson & Associates, Inc. August 8, 2003. Preliminary Drainage Study for Hoskings Ranch TM 5312. Julian, California.
- Masson & Associates, Inc. November 10, 2003. Stormwater Management Plan for Hoskings Ranch TM. Julian, California.
- Masson and Associates. 2008. Vegetation Exhibit TM 5312 RPL 3. Hoskings Ranch, Julian, California.
- Minshall, Herbert L., 1976. *The Broken Stones*. Copley Books, San Diego.
- Moratto, Michael J., 1984. *California Archaeology*. Academic Press, Orlando.
- Moriarty, James R., III, 1966. Cultural Phase Divisions Suggested By Typological Change Coordinated with Stratigraphically Controlled Radiocarbon Dating in San Diego. *The Anthropological Journal of Canada* 4 (4):20-30.
- Munz, P.A., 1974. A flora of Southern California. University of California Press. Berkeley. 1086p.
- National Aeronautics and Space Administration: *Air Pollution as a Climate Forcing: A Workshop*. 2002. <http://www.giss.nasa.gov/meetings/pollution2002/summaryc.html>
- National Geographic. 2000. California Seamless USGS Topographic Maps on CD-ROM (California TOPO!).
- A New Proposal: Some Suggestions for San Diego Prehistory, 1987. In *San Dieguito-La Jolla: Chronology and Controversy*, edited by Dennis Gallegos, pp. 35-42. San Diego County Archaeological Society, Research Paper 1.
- Occupational Safety and Health Administration: *Guideline for Nitrous Oxide*, 1999. <http://www.osha.gov/SLTC/healthguidelines/nitrousoxide/recognition.html>
- Office of the California Attorney General. Addressing Global Warming Impacts at the Local Agency Level. May 21, 2008.

The Pauma Complex in Northern San Diego County: 1978, 1980. *The Journal of New World Archaeology* 3 (4):1-39.

People of the Old Stone Age at China Lake, 1973. Manuscript. Great Basin Foundation, San Diego.

Peterson, R.T., 1966. A field guide to western birds. Houghton-Mifflin Company, 1966. 366p.

Professional Archaeological Services. July 2004. Cultural Resources Survey and Assessment of 1,416.5 Acres of the Hoskings Ranch South of State Highway 78/79 Near Julian. San Diego County, California.

Raven, P.H., Thompson, H.J., and B.A. Prigge, 1986. Flora of the Santa Monica Mountains, California. Southern California Botanists, Special Publication No. 2., Los Angeles. 181p.

Rimpo and Associates. URBEMIS 2007 (Version 9.2.4) – Calculating emissions from land use sources.

Robbins-Wade, Mary, 1986. Rising Glen: SDM-W-143/146 (SDI-5213 C & D). *Casual Papers* 2 (2):37-58. Cultural Resource Management Center, San Diego State University, San Diego.

Rogers, Malcolm J., 1939. Early Lithic Industries of the Lower Basin of the Colorado River and Adjacent Desert Areas. San Diego Museum of Man Papers No. 3, San Diego.

Rogers, Thomas H., *Geologic Map of California Santa Ana Sheet*. California Division of Mines and Geology, Sacramento.

San Diego County General Plan, Julian Community Plan, Part X. Adopted December 16, 1976, amended December 16, 1987.

San Diego County General Plan, Regional Land Use Element, Part II. Adopted January 3, 1979, amended December 10, 2003.

San Diego Herpetological Society, 1988. Survey and status of endangered and threatened species of reptiles natively occurring in San Diego County. San Diego County Fish and Wildlife Committee (Unpublished) 24p.

The San Dieguito Complex: A Review and Hypothesis, 1967. *American Antiquity* 32:168-185.

The San Dieguito and La Jolla: Some Comments, 1987. In *San Dieguito-La Jolla: Chronology and Controversy*, edited by Dennis Gallegos, pp. 73-85. San Diego County Archaeological Society, Research Paper 1.

San Dieguito-La Jolla: Chronology and Controversy, Ten Years Later, 1998. Discussant in symposium at the 32nd Annual Meeting of the Society for California Archaeology, San Diego.

Scheidt, V, 1980. Status of the amphibians of San Diego County. San Diego County Fish and Wildlife Committee (Unpublished). 36p.

Seifert, Harry. November 25, 2003. Personal Communication. Julian Water District, Julian, California.

A Separate Origins Theory for Two Early Man Cultures in California, 1987. In *San Dieguito-La Jolla: Chronology and Controversy*, edited by Dennis Gallegos, pp. 49-60. San Diego County Archaeological Society, Research Paper 1.

Shackley, M. Steven, 1988. Archaeological Investigations at SDi-5103. A San Dieguito Lithic Workshop, San Diego County, California. Brian F. Mooney Associates, San Diego.

Smith, J.P. and K. Berg, 1988. Inventory of rare and endangered vascular plants of California. California Native Plant Society, Sacramento. 168p.

State of California. 1999. California Irrigation Management Information System (CIMIS) Reference Evapotranspiration (Eto) Zones Map.

Stebbins, R.C., 1985. A field guide to western reptiles and amphibians. Houghton Mifflin Company, Boston. 336p

Tate, J.A., 1986. The blue list for 1986. *American Birds* 40 (2); 227-235.

Theis, C.V. 1936. Estimating the Transmissivity of a Water Table Aquifer from the Specific Capacity of a Well. U.S. Geological Survey Water Supply Paper 1536-I:332-336.

Townley, Sidney D. 1939. Earthquakes in California, 1769 to 1924. *Bulletin of the Seismological Society of America*, Vol. 29, No. 1, pp. 21-252.

True, D.L., 1958. An Early Complex in San Diego County, California. *American Antiquity* 23 (3):255-263.

True, D.L., and Eleanor Beemer, 1982. Two Milling Stone Inventories from Northern San Diego County, California. *Journal of California and Great Basin Anthropology* 4 (2):233-261.

True, D.L., C.W. Meighan, and Harvey Crew, 1974. Archaeological Investigations at Molpa, San Diego County, California. *University of California Publications in Anthropology* 11, Berkeley.

United States Department of Agriculture. Natural Resources Conservation Service. <http://websoilsurvey.nrcs.usda.gov>. June 2008. Web Soil Survey 2.0. Soil Map-San Diego County Area, California.

U.S. Department of Agriculture, Soil Conservation Service and Forest Service, 1973. Soil Survey, San Diego, California.

U.S. Department of Agriculture, Soil Conservation Service and Forest Service, 1970. Soil Survey, Sheet No. 38 & 39, San Diego Area, California (Santa Ysabel & Julian Quadrangles).

U.S. EPA (1992). Screening Procedures for Estimating the Air Quality Impact of Stationary Sources, Revised, October 1992, EPA-454/R-92-019. U.S. Environmental Protection Agency, Research Triangle Park, NC.

U.S. EPA (1995). User's Guide for the Industrial Source Complex (ISC3) Dispersion Models, September 1995, EPA-454/B-95-003a. U.S. Environmental Protection Agency, Research Triangle Park, NC.

U.S. EPA(April 2007). eGRID 2006 Version 2.1.

U.S. EPA (2001). Appendix W to Part 51 - Guideline on Air Quality Models, 2001. U.S. Environmental Protection Agency, Research Triangle Park, NC.

United States Geological Survey. 1960. Santa Ysabel Quadrangle. San Diego County, California. Scale 1:24,000.

United States Geological Survey. 1960. Julian Quadrangle. San Diego County, California. Scale 1:24,000.

United States Geological Survey (USGS) and the Southern California Earthquake Center (SCEC). October 20-24, 1999. Los Angeles Region Seismic Experiment (LARSE) II- Working Towards a Safer Future for Los Angeles "LARSE II" Earthquake Hazard Study.

United States Geological Survey (USGS). 2004. <http://landslides.usgs.gov/landslide.html>.

University of California, Office of Planning, Design and Construction. 2002. UC CEQA Handbook.

Wallace, William J., 1955. A Suggested Chronology for Southern California Coastal Archaeology. *Southwestern Journal of Anthropology* 11:214-230.

Warren, Claude N., 1966. Conclusions. In *The San Dieguito Type Site: M.J. Rogers' 1938 Excavation on the San Dieguito River*. San Diego Museum Papers No. 5, edited by Claude N. Warren, pp. 1-39.



Warren, Claude N., D.L. True, and Ardith A. Eudey, 1961. Early Gathering Complexes of Western San Diego County: Results and Interpretations of an Archaeological Survey. *Archaeological Survey Annual Report 1960-1961*, pp. 1-106. Department of Anthropology and Sociology, University of California, Los Angeles.

Willis, E, 1997. San Diego County Fire Chief's Association. Wildland/Urban Interface Development Standards.

Winterrowd, Cathy L., and D. Seán Cárdenas, 1987. *An Archaeological Indexing of a Portion of the Village of La Rinconada de Jamo SDI-5017 (SDM-W-150)*. RBR & Associates, Inc., San Diego. Report submitted to City of San Diego, Planning Department. Report on file at South Coastal Information Center.

Wray, Christopher, 2004. The Historic Backcountry: A Geographic Guide to the Historic Places of the San Diego County Mountains and the Colorado Desert. Christopher Wray, La Mesa, CA.

[www.bewaterwise.com](http://www.bewaterwise.com). 2004. Fire-resistant California Friendly Plants.

[www.ucfpl.ucop.edu](http://www.ucfpl.ucop.edu). 2004. University of California, Berkeley, Forest Projects Laboratory, College of Natural Resources. Defensible Space Landscaping in the Urban/Wildland Interface. A Compilation of Fire Performance Ratings of Residential Landscape Plants.

This page intentionally left blank

## CHAPTER 6.0 LIST OF ~~DEIR~~FEIR PREPARERS AND PERSONS AND ORGANIZATIONS CONTACTED

### Vincent N. Scheidt — Biological Resources Survey Report

Vincent N. Scheidt, Principal

Julia Groebner, Associate Biologist

Brandon Myers, Associate Biologist

### Affinis — Cultural Resources Assessment

Mary Robbins-Wade, Archaeologist

Andrew Giletti, Field Director

John Meriwether, Archaeologist

Matt Sivba, Crew Chief

Stephen R. VanWormer, Historian/Archaeologist

Gabe Kitchen, American Monitor

Phil Pena, American Monitor

### KOA Corporation — Traffic Impact Study

Arnold Torma, Senior Traffic Engineer

Roger Pelayo, Assistant Transportation Planner

### TRS Consultants — Environmental Impact Report

Mark Thompson, Principal

Marlene Wendel, Planner

### TRS Consultants — Visual Analysis

Jeri Dilno, Planner

### TRS Consultants — Agricultural Conversion Analysis (24-Lot and 34-Lot)

Mark Thompson, Principal

Andrea Beach, Planner

### TRS Consultants — Lot by Lot Analysis of the Agricultural Capacity of a 24-Lot Design

Mark Thompson, Principal

Andrea Beach, Planner

Urban Crossroads, Inc. — Air Quality Study

Aric Evatt, Engineer

Haseeb Qureshi, Engineer

Urban Crossroads, Inc. — Global Climate Change Analysis

Aric Evatt, Engineer

Haseeb Qureshi, Engineer

AECOM — Geologic Reconnaissance Study

Douglass Roff, Principal Scientist

Rob Schumann, Engineer

AECOM — Hydrogeologic Investigation

Douglass Roff, Principal Scientist

Rob Schumann, Engineer

Lamont Landis — Fire

Lamont Landis, Principal

Masson & Associates, Inc. — Preliminary Drainage Study

Scott Lee, Engineer

Masson & Associates, Inc. — Stormwater Management Plan

Scott Lee, Engineer

Masson & Associates, Inc. — Mapping/Surveying

John Gervais

Dan Masson, Engineer

Bo Sousa, Vice President

United States Fish & Wildlife Service

Michelle Moreno

~~Randy Rodriguez~~



California Department of Fish & ~~Game~~Wildlife  
Randy Rodriguez

California Department of Conservation

County of San Diego

Kristin Blackson, EIR Specialist

Dennis Campbell, Project Manager

Beth Ehsan, Biologist

Dave Sibbett, Planning Manager

Mindy Fogg, Project Manager

Peter Eicher, EIR Specialist

Poonam Boparai, Land Use Environmental Planner

This page intentionally left blank

## CHAPTER 7.0 LIST OF MITIGATION MEASURES AND ENVIRONMENTAL DESIGN CONSIDERATIONS

### 7.1 Biology 2.1

#### 7.1.1 Mitigation

##### M-BI-1

The ~~4,209.81~~<sup>4,214.8</sup>-acre Open Space Easement will preclude future development or other use of the land within that area and provides the mitigation required for all biological impacts onsite (M-BI-1 through M-BI-19).

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

A complete breakdown of Proposed Project impacts, mitigation requirements, impact neutral acreage, and mitigation area provided within the Project open space is provided as follows:

- 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 Project protects a total of 104.9 acres in the OSE, 26.9 acres of which are impact neutral. The total available for mitigation is therefore 78.0 acres, which is 71.7 acres above the requirement.
- 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 protects a total of 96.1 acres in the OSE, 12.7 acres of which are impact neutral. The total available for mitigation is therefore 83.4 acres, which is 83 acres above the requirement.
- 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 protects a total of 36.8 acres in the OSE, 1.5 acres of which are impact neutral. The total available for mitigation is therefore 35.3 acres, which is 27.7 acres above the requirement.
- 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 protects a total of 58.6 acres in the OSE, 6.0 acres of which are impact neutral. The total available for mitigation is therefore 52.6 acres, which is 27.0 acres above the requirement.
- 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, well above the requirement.
- A loss of 43.7 acres for Project development and 2.2 acres of open space easement vacation of Engelmann Oak Woodland requires a total of 144.3 acres of mitigation at ratios of 3:1 and 6:1, respectively. The Proposed Project provides 200.1 acres in the OSE, well above the requirement.
- 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, well above the requirement.

- 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.
- 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. The Proposed Project provides 273.0 acres in the OSE, well above the requirement.
- 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, well above the requirement.
- A loss of 0.25 acre of Riparian Scrub requires 0.75 acre of mitigation at a ratio of 3:1. The Proposed Project provides 2.96 acres in the OSE. 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 onsite acres of Riparian Scrub are considered 'impact neutral', and cannot satisfy the requirement for mitigation of this impact. The proposed mitigation would be either offsite mitigation in an approved wetland mitigation bank, or the preparation and implementation of an approved Wetland Revegetation Plan (provided as Attachment E to the biology report), in keeping with the no net loss of wetland policy adopted by the County.

#### M-BI-2

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

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

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

#### M-BI-3

The protections provided by the RMP over the open space areas onsite will provide protections for raptors (including Golden Eagle, specifically), migratory birds, and other sensitive bird species' and their habitats as well. In order to prevent potential impacts to the nesting success of sensitive animals, site brushing, grading, and/or the removal of native vegetation within 500 feet of any potential nesting location shall not take place.



during the native bird season, defined as from 1 January to ~~September 131~~ August each year. This is required in order to ensure compliance with the federal Migratory Bird Treaty Act and Sections 3505, 3505.5, and 3513 of the California Fish and Game Code, which prevent the 'take' of eggs, nests, feathers, or other parts of most native bird species. Should it be necessary to conduct brushing, grading, or other construction activities during the bird breeding season, a biologist with experience conducting bird breeding surveys will conduct 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 Development Services and the Wildlife agencies for concurrence with the conclusions and recommendations. If an active nest is detected, no grading or other construction activity will be allowed within the 500 foot buffer will be allowed until the fledged birds have left the nest. The buffer distance may be altered in which case a site specific nest protection plan will be developed. The plan will include detailed methodologies and definitions to enable a qualified avian biologist to monitor and implement rest-specific buffers based on the individual species involved, site conditions, level of human activity, and other activity in the area.

#### 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 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.

#### M-BI-5

A Conservation Grazing Management Plan (CGMP) for the Proposed Project 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. This includes a discussion of climate, water resources, geology, special physical features, soils, erosion, hydrology, surface water drainage, and water quality along with grazing capacity, infrastructure, special management areas and hazards, ecosystem health, special habitats and feature characteristics. The CGMP identifies predicted effects and desired conditions, including the consequences of grazing and related management of special resources, non-grazing (but related) management of special resources, alternative feasible management scenarios, and timeline of management requirements of special resources affected by grazing. The Plan discusses sustainability, including integration with the regional socio-economic systems for long-term viability, and guidelines, incentives, and contingencies for all operations. Finally, the CGMP defines the monitoring of site conditions and the planned effects on resources related to grazing, including monitoring variables, methods, a schedule, evaluation standards and analysis, adaptation of management actions, and reporting.

#### M-BI-6

Because the Proposed Project will impact federal jurisdictional wetlands, it will likely be necessary to obtain certain regulatory agency permits prior to project development. The applicant is required to consult with ACOE regarding Clean Water Act Section 404 permits. As part of this process, the ACOE will likely require that jurisdictional wetland

delineation be conducted and that a jurisdictional wetland delineation report be prepared in order to quantify all Proposed Project impacts to jurisdictional wetlands.

#### M-BI-7

The Proposed Project is in compliance with the County's RPO requirement that impacts to RPO wetlands be avoided except under certain extenuating circumstances (See RPO Section 86.604(a)(5)). Section 2.1.2.5 of this ~~DEIR~~FEIR provides the details of those impacts and their analysis. The County also requires buffers of at least 50-feet to protect all RPO wetlands. The County considers RPO wetlands and the habitat within RPO wetland buffers to be "impact neutral" and therefore unavailable for use as mitigation for project impacts. Furthermore, where oak woodland occurs adjacent to an RPO wetland, the County requires that the wetland buffer be extended outward to include the entirety of the oak habitat (not to exceed 200 feet in width). Where feasible, the Proposed Project complies with these requirements.

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

The least damaging construction methods will be utilized to construct the RPO wetland crossing and driveways. Staging areas will be located outside of sensitive areas, work will not be performed during the avian breeding season, noise attenuation measures will be included, and hours of operation will be limited so as to comply with all applicable ordinances and avoid impacts to sensitive resources. These measures will also be included in the RMP to be prepared as a Condition of Project Approval. Lastly, as discussed above, all direct impacts to RPO wetlands will be mitigated for at a 3-to-1 ratio, with no less than 1-to-1 of this total consisting of wetlands creation.

#### M-BI-8

The Proposed Project will be required to obtain a HLP from the County of San Diego. The permit will mitigate agency concerns by providing appropriate mitigation for all project-related impacts to Diegan Coastal Sage Scrub and related Scrub habitats. The site supports approximately 150.3 acres of Scrub habitat (Diegan Coastal Sage Scrub, Inland Form, Flat-top Buckwheat, and Coastal Sage – Chaparral Scrub), 16.7 acres of which will be impacted by development.

### **7.1.2 Design Considerations**

Open space as designed shall be used to protect biological resources.

## **7.2 Cultural Resources 2.2**

### **7.2.1 Mitigation**

#### **M-CR-1, M-CR-2, M-CR-3, M-CR-5, M-CR-6**

A monitoring program will be implemented for any grading or other ground-disturbing activity. The monitoring program will be required not only for ground-disturbing activities as part of the Tentative Map, but also any development that occurs subsequent to approval of the TM. The monitoring and data recovery program must be provided to the satisfaction of the Director of Planning and Development Services, and must include monitoring by a County-approved archaeologist and a Native American monitor.

~~Appendix C provides details about the requirements of the monitoring program which address data discovery, recovery, and documentation; notes to the Grading Plan; and necessary sign-offs and documentation proving adherence to the program.~~

~~Appendix B provides details about the requirements of the monitoring program which address data discovery, recovery, and documentation; notes to the Grading Plan; and necessary sign-offs and documentation proving adherence to the program.~~

The archaeological consultant, County staff, and Native American representatives will work together to determine the disposition of any Native American cultural material collected, determining if some material would be repatriated rather than curated, taking into account the definitions under NAGPRA. Historic era cultural material collected would be curated.

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

#### **M-CR-4**

Although the Proposed Project is not directly responsible for the eroding condition of CA-SDI-16,881/H, mitigation for this impact will be a condition of project approval. 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.

### **7.2.2 Design Considerations**

Sites are assumed to be RPO-significant resources and the majority are all located in areas that are proposed for open space protection. One site, CA-SDI-16,881/H, will not be affected by the Project, but will continue to erode naturally and mitigation is required, as described above. The proposed mitigation will reduce impacts to a level of no significance.

### **7.3 Traffic 2.3**

#### **7.3.1 Mitigation**

##### **M-TR-1**

The Proposed Project will pay a TIF fee toward improvements to the local roadway network.

#### **7.3.2 Design Considerations**

Vegetation that may obstruct required sight distance for project intersections (Pine Hills/Tenaya Road and Pine Hills/SR78/79) will be trimmed.~~Mitigation for Proposed Project impacts covers design considerations.~~

### **7.4 Visual Resources 3.1.1**

#### **7.4.1 Design Considerations**

The Proposed Project will not significantly alter key views in the area because of the low density proposed and distance of pads from scenic highways. Grading has been designed to minimize landform alteration. New roads follow existing roads where possible and pads will be generally placed on the flatter portions of the site. Significant features noted earlier in the analysis, specifically the prominent knoll in the northeast part of the site and Orinoco/Temescal Canyon Creeks in the south, will be preserved in open space by the Proposed Project's design.

### **7.5 Agricultural Resources 3.1.2**

#### **7.5.1 Design Considerations**

The Proposed Project proposes to amend the contract to allow minimum lot-sizes of 40 acres on approximately 161.23 additional acreage. The Proposed Project design provides adequate area on each lot to support a minimum of two agricultural uses.

The Proposed Project will be required to incorporate an agricultural component on each lot prior to approval of building plans for a residence. While no residences are proposed as part of this application, Hoskings Ranch proposes measures to ensure that, should housing be proposed at a future time, it will remain incidental to agricultural uses during the life of the Williamson Act contract. These measures are:

1. Disclosure of the Williamson Act Contract requirement that agriculture be established on the site prior to construction of a residence to anyone leasing or buying a parcel in Hoskings Ranch.

A number of the Proposed Project's design features will preclude impacts to adjacent agricultural operations. These include:

- Continuation of existing agriculture on the Propose Project Site. Most of the proposed residential lots are adjacent to areas that currently have an agricultural use, or are undeveloped. Conflicts with those areas where there is an adjacent agricultural use will be minimized due to the similarity of use and commonly shared issues between onsite and offsite operations (e.g., cattle grazing currently is carried out east, north, and southwest of the site).



- A Conceptual Grazing Management Plan (CGMP) has been prepared that provides scientifically-based management of habitats as related to grazing. All grazing activities will be subject to monitoring and reporting, as well as remedial action if and when needed, and will be coordinated with the Resource Management Plan (RMP). The CGMP is provided as Appendix B to this ~~DEIR~~FEIR.
- Proposing large lots ranging in size from 40 to 196 acres. This design provides flexibility in the siting of residences. As a result, residential pads are generally located away from project boundary areas.
- Monitoring and control of the use of pesticides via pesticide permitting through the County of San Diego Department of Agriculture, Weights and Measures (AWM). A permit allows AWM to require limitations such as implementing buffer zones around the application, prohibiting applications by air, or limiting the amount of acreage treated at any one time. The Proposed Project will conform to AWM's requirements.
- Minimization of odor impacts through the Project's large lot design, which separates on- and off-site uses. Grazing density on the site will be low density of approximately ~~6080~~ head of cattle, or an average of one cow per 17.7 acres.

## **7.6 Air Quality/Climate Change 3.1.3**

### **7.6.1 Design Considerations**

#### **Required Design Features**

The following project design features will be implemented by the Proposed Project as required by the applicant:

- During construction activity, off-road construction equipment shall use biodiesel fuel (a minimum of 20 percent biodiesel) to the maximum extent possible. This provision applies to the grading and building construction phases of the Proposed Project and excludes asphalt paving, trenching, and off-site improvements). Commercially reasonable efforts shall be made to obtain a biodiesel supplier for the Proposed Project. Construction equipment exempt from this measure include those with warranties that would be voided if B20 biodiesel fuel was used. Prior to issuance of grading permits the applicant shall provide documentation to the County that verifies that certain equipment are exempt; that a biodiesel supply has been secured; and that the construction contractor is aware that the use of biodiesel is required, or alternatively why the use of biodiesel fuel is not commercially feasible for this Proposed Project.
- Prior to issuance of a building permit, the applicant shall demonstrate that the design of the proposed buildings or structures meets the current Title 24 requirements (Title 24, Part 6 of the California Code of Regulations; Energy Efficiency Standards for Residential and Non Residential Buildings, 2008; Cool Roof Coatings performance standards as amended September 11, 2006). Documentation of compliance with this measure shall be provided to the Planning Department and Building Official for review and approval prior to issuance of the permit.
- The following design considerations are required in order to maintain emissions levels within acceptable limits:

- Adhere to best management practices which include the application of water on disturbed soils three times per day (3.2 hour watering interval), covering haul vehicles, replanting disturbed areas as soon as practical and restricting vehicle speeds on unpaved roads to 15 mph or less to control fugitive dust.
- During construction activities, construction equipment shall be properly maintained to ensure proper timing and tuning of engines. Equipment maintenance records and equipment design specification data sheets shall be kept on-site during construction activity. It is conservatively estimated that keeping engines timed/tuned and reducing idling time will achieve a 5 percent reduction for emissions of VOCs, CO, NOx, SOx, PM10, and PM2.5 exhaust emissions during construction activity.
  - During construction activities, contractor shall ensure that all equipment on-site will not idle for more than five (5) minutes.
  - Contractor shall ensure use of low-sulfur diesel fuel in construction

#### Recommended Design Features

Inclusion of the following building practices and design features are conservatively anticipated to yield a reduction in project emissions associated with energy use, water use, and natural gas use.

- Prior to issuance of a building permit, the applicant shall demonstrate that the proposed building or structure designs incorporate exterior storage areas for recyclables and green waste and adequate recycling containers are located in any public areas. Documentation of compliance with this measure shall be provided to the County Building Official for review and approval. Installation of the identified design features or equipment will be confirmed by the County Building Official prior to issuance of a certificate to occupancy.
- The applicant shall provide education materials about reducing waste and available recycling program services to future tenants. The education materials shall be provided to the County for review and approval by the Planning Department.
- All showerheads, lavatory faucets, and sink faucets within the residential units shall comply with the California Energy Conservation flow rate standards.
- Low flush toilets will be installed in all residential units as specified in the California State Health and Safety Code Section 17921.3.

The following additional recommendations are provided by the California Attorney General's Office in the document *Addressing Global Warming Impacts at the Local Agency Level*, 2008.

#### *Energy Efficiency*

- Design buildings to be energy efficient consistent with the California Energy Commission's Tier II Energy Efficiency Goals. Measures to increase energy efficiency may include siting buildings to take advantage of the shade, prevailing winds, and landscaping or other sun screens to reduce energy use.
- Install efficient lighting and lighting control systems. Use daylight as an integral part of lighting systems in buildings.
- Install light colored 'cool' roofs for residential units (e.g., reflective pavement, pavements with high albedo, etc.), and strategically placed shade trees.

- Install Energy Star Rated heating and cooling systems, appliances and equipment, and control systems.
- Provide educational materials on energy efficiency at the time of purchase, work with local energy provider to distribute pamphlets and additional relevant materials.

#### *Renewable Energy*

- Offer solar energy systems, solar and tankless hot water heaters, and energy-efficient (Energy Star Rated) heating ventilation and air conditioning systems as an option at purchase to residential customers. Educate customers about existing incentives.

#### *Water Conservation and Efficiency*

- Install water-efficient irrigation systems and devices, such as soil moisture-based irrigation controls.
- Design buildings to be water-efficient, that in aggregate use 20 percent less water than baseline water use (not including irrigation) after meeting the Energy Policy Act of 1992 fixture performance requirements. Install water-efficient fixtures and appliances such as ultra-low flush toilets and high efficiency clothes washing machines.
- Restrict watering methods (e.g., prohibit systems that apply water to non-vegetated surfaces, restrict watering in the evenings and early morning) and control runoff.
- Implement low-impact development practices that maintain the existing hydrologic character of the site to manage storm water (i.e., by retaining storm water run-off on-site) and protect the environment.
- Provide education about water conservation and available programs and incentives.

#### *Solid Waste Measures*

- Reuse and recycle 50 percent of construction and demolition waste (including, but not limited to, soil, vegetation, concrete, lumber, metal, and cardboard).
- Provide interior and exterior storage areas for recyclables and green waste and adequate recycling containers located in public areas.
- Provide education and publicity about reducing waste and available recycling services

#### *Construction Activities*

- Best management practices (BMPs) are to include the application of water on disturbed soils three times per day (3.2 hour watering interval), covering haul vehicles, replanting disturbed areas as soon as practical and restricting vehicle speeds on unpaved roads to 15 miles per hour (mph) or less, to control fugitive dust.
- During construction activities, construction equipment shall be properly maintained to ensure proper timing and tuning of engines. Equipment

maintenance records and equipment design specification data sheets shall be kept on-site during construction activity. It is conservatively estimated that keeping engines timed/tuned and reducing idling time will achieve a five percent reduction for emissions of VOCs, CO, NO<sub>x</sub>, SO<sub>x</sub>, and PM<sub>10</sub> exhaust emissions during construction activity.

- During grading activities, chemical soil stabilizers shall be applied to inactive areas to reduce fugitive dust emissions. It is conservatively estimated that implementation of this measure will reduce PM<sub>10</sub> and PM<sub>2.5</sub> fugitive dust emissions by approximately 84 percent.
- During construction activities, contractor shall ensure that all equipment on-site will not idle for more than five (5) minutes.
- Contractor shall ensure use of low-sulfur diesel fuel in construction equipment as required by the California Air Resources Board (CARB).

## **7.7 Geologic Resources 3.1.4**

### **7.7.1 Design Considerations**

- All habitable structures built within the Proposed Project Site will utilize the Universal Building Code's Seismic Hazards Standards for construction within a county.

## **7.8 Groundwater Resources 3.1.5**

### **7.8.1 Design Considerations**

- The 24 private wells serving the lots on the project are located such that their use will not create any offsite well interference.
- Wells will be drilled no closer than 300 feet from the project boundary.

## **7.9 Fire Hazard 3.1.6**

### **7.9.1 Design Considerations**

#### **Fuel-Management Zones**

The Proposed Project has been designed to incorporate a 100-foot Limited Building Zone (LBZ) between open space and future development areas to maximize fire safety. The LBZ includes specific Fuel Management Zones (FMZs), as described below.

The following measures ensure the success of Fuel Management Zone 1 (FMZ1):

- No combustible construction, groves, firewood, propane tanks, fuel or combustible native or ornamental vegetation shall be allowed within the 50 feet of this FMZ, or 30 feet of the edge of slopes.
- Mature trees (above 18 feet in height) are to be limbed up or canopied six to eight feet from ground level.
- No tree limbs are allowed within ten feet of chimney outlets, nor are any dead limbs allowed to overhang structures.
- Spacing between mature tree canopies must be as follows:



- Slopes 0 to 20 percent – 10 feet distant
- Slopes 21 to 40 percent – 20 feet distant
- Slopes greater than 40 percent – 30 feet distant
- The minimum horizontal space between the edges of shrubs must be as follows:
  - Slopes 0 to 20 percent – two times the height of the shrub
  - Slopes 21 to 40 percent – four times the height of the shrub
  - Slopes greater than 40 percent – six times the height of the shrub
- The minimum vertical space between the top of the shrub and the bottom of lower tree branches is three times the height of the shrub.
- All plants used within FMZ1 must comply with the San Diego County Acceptable Plant List.
- The landscaping plan for FMZ1 must be approved by the JCFPD.
- FMZ1 shall be delineated with permanent markers (e.g., metal fence post with orange paint finish on the top half of the post) until such time it is no longer needed, as determined by the Fire Marshal.

The following measures ensure the success of FMZ2:

- Fifty percent of the existing native combustible vegetation must be cleared in this area. Trees may remain provided that the horizontal distance between the crowns of trees is not less than ten feet.
- Orchards, groves, and vineyards shall be maintained as per section 4707.3.2 of the San Diego County Consolidated Fire Code, adopted revised October 28, 2011.
- Fire resistive plant materials are also required within this zone to control soil erosion and/or to reduce vegetation mass near the wildland interface.
- Plant spacing will be the same as noted for FMZ1.
- All plants used within FMZ2 must comply with the San Diego County Acceptable Plant List.
- The landscaping plan for FMZ2 must be approved by the JCFPD.
- FMZ2 shall be delineated with permanent markers (e.g., metal fence post with orange paint finish on the top half of the post) until such time it is no longer needed, as determined by the Fire Marshal.

#### Fuel Management Zone 3 - Road and Driveway Clearance

Fuel Management Zone 3 (FMZ3) focuses on roadside fuel modification and covers the area from the edge of the road or driveway to a width of 30 feet on each side of the road. The following design measures are part of FMZ3:

- All vegetation must be maintained at a height of 4 to 6 inches with all dead and down vegetation removed.
- Any plants within this area shall be from the San Diego County Acceptable Plant List and maintained per the requirements of FMZ1.

- Any off-site fuel management along Daley Flat Road and Hoskings Ranch Road shall be pledged memorialized and attached to the parcels through a Private Road Maintenance agreement through the San Diego County Department of Public Works.
- FMZ3 shall be delineated with permanent markers (e.g., metal fence post with orange paint finish on the top half of the post) until such time it is no longer needed, as determined by the Fire Marshal.

#### Land Dedication

~~The Proposed Project proposes the dedication of 5.0 acres of land along the northern boundary approximately one-half mile from the intersection of Pine Hills Road and SR78/79 for the purpose of creating a new fire station.~~

#### Construction Measures

- Roofs will be a Class "A" noncombustible material and shall meet San Diego County Department of Planning and Development Services (DPS) standards.
- Eaves and balconies will be on noncombustible material and meet San Diego County Building Code
- Exterior walls will be a noncombustible or ignition resistive material and meet the San Diego Building Code Chapter 7A.
- All habitable structures and attached garages will be equipped with automatic fire sprinklers per the County Consolidated Fire Code requirements (NFPA-13D). All sprinkler systems shall be approved by the JCFPD prior to installation.
- All future outbuildings must be approved by the JCFPD prior to installation.
- All structures will comply with the wildland area structural requirements of the San Diego Building Code Chapter 7A in affect at the time of a building permit application.

#### Maintenance Activities

- Each lot owner will be personally responsible for all irrigation and landscaping FMZs within their property boundaries.
- The JCFPD will hold each lot owner accountable for enforcement of all wildland fire protection issues discussed in the FPP.
- Each lot owner shall not allow trash dumping or disposal of any yard trimmings in the FMZs.
- The JCFPD or its designated representative shall decide any disputes related to individual lot landscaping or fuel treatment, with respect to interpretation of the FPP. Decisions shall be final and binding to the lot owner.
- Should modifications to the Tentative Map occur, any and/or all of the FPP may be revised at the discretion of the JCFPD.
- All exterior boundaries of FMZ1 and FMZ2 shall be permanently marked on the ground for purposes of guiding annual fuel maintenance and inspection operations. These markers must be spaced so that the markers to either side of any individual marker are visible.

### Emergency Access

- Dead end roads shall not exceed the 2,640 feet maximum allowable length.
- All new roads and driveways throughout the Proposed Project shall have a minimum vegetation clearance of 30 feet, as required in FMZ3, and shall meet or exceed all San Diego County DPS and JCFPD requirements by complying with the San Diego County Consolidated Fire Code.
- Requirements include all-weather road surfaces suitable for travel by 50,000 lb fire apparatuses.
- All driveways or roads exceeding 15 percent grade shall be surfaced in Portland cement concrete with deep broom finish perpendicular to the direction of travel to enhance traction.
- Roads shall not exceed 20 percent grade.
- All gates shall comply with section 503.6 of the San Diego County Consolidated Fire Code.

### Water Supplies

- Onsite water tanks and wells will supply water for firefighting. Storage required for firefighting will comply with the conditions identified in Table 507.2.2 of the County Consolidated Fire Code.

## **7.10 Surface Water Resources 3.1.7**

### **7.10.1 Design Considerations**

The Proposed Project has been designed so it will not contribute to pollution in excess of allowed standards.

- Development has ~~Graded areas have~~ been limited to 201.949.5 acres on the 1,416.5-acre site.
- Proposed culverts, inlets, and brow-ditches have been appropriately sized to accept 100-year flows.
- The Proposed Project will not place housing, habitable structures, or unanchored impediments to flow in a 100-year floodplain area.
- Crossings will be sized to accommodate 100-year flood events.
- Road improvements have been aligned to avoid or minimize impacts to receiving waters.
- A hydromodification study and SWMP for the Proposed Project will follow the County's SUSMP and hydromodification criteria which addresses LID and post project treatment control BMPs and retention to target pollutants of concern.
- Examples of LID standards include preserving large open space areas and minimizing disturbances to natural drainages.
- BMP controls will be a combination of site-design, source control and LID, as well as Treatment Controls for each house pad.

- Examples of BMPs include labeling and signage of storm drain outlets that indicates dumping is prohibited, preserving existing native vegetation, minimizing irrigation and runoff, proper plant selection, avoiding the use of pesticides, providing IPM information to owners, and avoiding roofing, gutter, and trim made of copper or other unprotected metals that may leach into runoff.
- Additional BMPs deemed necessary during the design phase of the Proposed Project will be incorporated with approvals from the County.
- Streets will utilize vegetated bio retention techniques with minimum travel or residence time of ten minutes to treat street runoff.
- Any increase in flows and volumes will be mitigated through the use of detention basins and LID practices for hydromodification controls.
- Erosion effects are minimized by the collection of concentrated flows in stabilized drains and channels.
- Curb cuts to natural vegetation and rural bio retention techniques are used.
- Shared access driveways are used to reduce graded area.
- Brow ditches will be used to control runoff from impervious surfaces, and storage areas will be paved.
- Construction permits will not be issued until the County approves all treatments.

## **7.11 Noise 3.1.8**

### **7.11.1 Design Considerations**

- The Proposed Project does not place any pads within the 60 dBA noise contours.
- Individual lots will be graded separately and will be located at least 90 feet from any existing or proposed occupied property line.