



County of San Diego

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September 19, 2019

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

Project Name: Ocean Breeze Ranch
Project Record Numbers: PDS2016-TM-5615; PDS2016-MUP-16-012; PDS2016-MUP-013;
PDS2016-STP-16-032
Environmental Log Number: PDS2015-ER-15-08-001
Habitat Loss Number: PDSXXXX-HLP-XXX

APN(s): 124-150-28, 124-150-34, 124-150-35, 125-080-21, 125-131-48,
125-131-49, 125-131-54, 126-060-78, 127-191-20, 127-230-59,
127-271-01, 127-271-02.

Lead Agency Name and Address:
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Project Location:
The Proposed Project (Project) is located within the unincorporated community of Bonsall in northern San Diego County. The 1,402.52-acre Project site is located at 5820 West Lilac Road, Bonsall. The site is located within the Bonsall and Fallbrook Community Plan areas. The San Luis Rey River is located to the north of the Project site, with State Route 76 (SR-76) and rural residential development occurring to the north side of the river. Interstate 15 (I-15) and rural residential development are located to the east, and rural residential development to the south and west. In addition, a California Department of Transportation (Caltrans) mitigation site is located along the northern property boundary, extending to the San Luis Rey River. The mitigation site is associated with the SR 76 East – South

Mission Road to Interstate 15. Sullivan Middle School abuts the southern boundary of the Project site, adjacent to West Lilac Road.

Project Applicant Name and Address:

Ocean Breeze Ranch LLC
1550 South Coast Highway, Ste. 201
Laguna Beach, CA 92651

General Plan

Community Plan:	Bonsall
Regional Categories:	Village, Semi-Rural, Rural, No Jurisdiction
Land Use Designations:	Village Residential (VR-4.3), Semi-Rural Residential (SR-4), Semi-Rural Residential (SR-10), Rural Lands (RL-20), and Rural Lands (RL-40)
Density:	VR-4.3, SR-4, SR-10, RL-20, RL-40
Floor Area Ratio (FAR)	N/A

Zoning

Use Regulation:	Variable Family Residential (RV), Limited Agriculture (A70), and Open Space (S80)
Minimum Lot Size:	1 du per 6,000 Square Feet, 1 du per 2 Acres, 1 du per 4 Acres, 1 du per 8 acres
Special Area Regulation	Community Design Review (B), Flood Plain (F), Airport (C)

Description of Project:

Ocean Breeze Ranch (Project) includes two components, a planned residential development (PRD) and a private equestrian facility. The residential development would include 396 residential lots divided into three planning areas (PA1, PA2, and PA3). The PRD would also include parks, roads and landscaped areas. The equestrian facility consists primarily of previously constructed buildings and structures; additional improvements are also proposed. The Project would also preserve 833.85 acres of the Project site as biological open space. The components of the Project are described in greater detail below.

Project Site Description:

The Project site includes a variety of terrain, from the relatively flat alluvial plain along the San Luis Rey River on the northern boundary of the site, to ridges and hillsides near the southern boundary. Elevations range from approximately 175 feet above mean sea level (msl) along the river to 825 feet in the southeastern portion of the site. Historically the site been used for agriculture, including farming and ranching, since the late 1800s. In more recent decades, the site has also been used as an equestrian facility for stallion breeding. Existing structures in the lower elevations of the site include barns, stables, covered and uncovered pens, extensive pastures for horses, small offices, a veterinary building, and employee homes.

Discretionary Actions:

Discretionary permits for the Planned Residential Development include a Tentative Map and Major Use Permit (MUP). The as-built equestrian facility also requires an MUP. The Project is consistent with the residential density allowable under the County General Plan. The PRD would reallocate and condense the majority of dwelling units to western portion of the Project site.

Planned Residential Development:

The Project has been designed as a Conservation Subdivision by consolidating the development footprint in a way which minimizes impacts to environmental resources, with avoided areas set aside as

open space. The Project encompasses a total of 396 residential lots within three planning areas – PA 1, PA 2, and PA 3 as shown in the table below. A single larger estate parcel is also proposed totaling approximately 24 acres.

Description	Gross Area (Acres)	Use	Residential Lots	Minimum Lot Size
Planning Area 1	67.41	Residential	144	5,000 Sq Ft
Planning Area 2	66.69	Residential	237	4,500 And 5,000 Sq Ft
Planning Area 3	153.47	Residential	14	5 Acres
Lot EEE	203.61	Equestrian Mup	N/A	N/A
Net Bio-Open Space	832.72	Bio-Open Space	N/A	N/A
Impact Neutral Easement	14.10	Bio-Open Space	N/A	N/A
Hillside Estate	24.24	Residential	1	N/A
Remainder Parcel	30.22	School	N/A	N/A
West Lilac Road	10.06	Road/Slopes	N/A	N/A
Total	1,402.52		396	

Access to the residential development in PA 1 and PA 2 would be provided from West Lilac Road. The estate parcel would also be accessed off West Lilac Road. Access to PA 3 would be provided by a gated private road off Dulin Road. The Project includes a network of internal access roads, including public streets in PA 1 and PA 2, and private/gated roadways in PA3. In PA 1 and PA 2, streets would be constructed to meet public standards. All roads within PA 3 would be privately owned and maintained by a homeowners' association.

To meet County and North County Fire Protection District requirements, the Project must provide an interim secondary emergency access/evacuation route after the first 50 homes are constructed in PA 1. Ultimately, the Project would extend Dulin Road westward on site through PA 3 and connect to other proposed internal roadways. Until the Dulin Road secondary access is fully constructed, an interim access route (IAR) is identified, which would use selected existing roads within the equestrian facility to provide an emergency evacuation route that connects between the existing reach of Dulin Road in the northeastern portion of the site and the existing paved Vessels Ranch Road in the western portion of the site. The IAR through the equestrian facility would overlap existing dirt roads.

The Project would incorporate forms indicative of traditional farmhouse and Craftsman style architecture with porches, dormers, and simple roof shapes. Conceptual residential designs are proposed for homes to be built within Planning Areas 1 and 2. A variety of floor plans and elevations have been designed to provide for aesthetic diversity. Planning Area 3 is proposed with individual custom lots and architectural design.

The Project proposes a total of 15.71 acres of public or private parks within Planning Areas 1 and 2, which includes 3.34 acres of public and private park area meeting the County's definition of usable park area. Two of the parcels would be public parks for a total of 3.21 acres meeting the County's definition of useable park area. Two public parks are planned (1.68 and 2.81 acres) for a total of 4.49 acres. The remaining five parks are planned to be private, (ranging from 0.34 to 7.02 acres), and would total 11.22 acres. An internal network of sidewalks, pathways and trails would be provided within PA 1 and PA 2 to provide access to proposed residential neighborhoods, parks, and nearby regional trail facilities planned for the future by the Department of Parks and Recreation.

The Project proposes within Planning Areas 1 and 2 walking loops on either sidewalks or trails, with allowances for connection points to the County's future San Luis Rey River Trail at the Project's northern boundary of the Project site. The Project also includes establishing a 15-foot wide trail

easement over an existing dirt road connecting the east end of Planning Area 1 southeast to HOA Lot DD, and then eastward along the southern edge of HOA Lot DD toward Sullivan Middle School. Outside of HOA Lot DD, the trail easement crosses biological open space, and would be fenced on either side. The easement would incorporate a 6-foot wide decomposed granite trail and would be gated at either end to prevent unauthorized vehicle access into biological open space. Conceptual Landscaping Plans have been prepared. These plans would define the extent and type of irrigation and plantings used for common area lots, as well as roadway parkways. Water conservation designs would be proposed, in order to both reduce land areas needing irrigation, as well as the water demands of plant materials being proposed.

In addition, the Project has been designed to include energy saving project features. The following list has been condensed. For a full list of energy saving features, please see sections 6. Energy and 7. Greenhouse Gas Emissions.

Energy saving project design features would include:

- Project-related construction activities would use Tier 3 or better construction equipment with Diesel Particulate Filters
- Install high-efficiency Light Emitting Diode (LED) street and area lighting to achieve reduction in overall lighting energy.
- The Project would only install Natural Gas fireplaces within all 396 residential units.
- The Project would seek to also achieve a 75% diversion goal by providing areas for storage and collection of recyclables and provide literature promoting recycling to achieve additional waste diversion.
- The Project applicant would demonstrate a 40% reduction in outdoor use and would submit a Landscape Document Package to show such compliance.
- Installation of low flow indoor water fixtures in all residential units.
- Plumb and install a single Level 2 electric vehicle (EV) charging station in each of the 396 residential units.
- The Project would install 1,973 KW of PV which is equivalent to 6,577 300-watt panels or an average of 16.6 panels per home.
- Building efficiency features such as High-Efficiency HVAC system, sealed (tight) air ducts that minimize heating and cooling HVAC losses, tankless water heaters and Low E dual pane windows.
- Increase new tree plantings throughout the neighborhood by planting two trees per dwelling unit which is equivalent to a minimum of 792 trees within the Project Site.
- Install weather-based irrigation systems which include rain sensing timers.

Equestrian Facility:

The private equestrian facility is an existing use on the Project site which includes approximately 165 horses on approximately 375 acres of land. The proposed equestrian facility is subject to a Major Use Permit and would permit a maximum of 400 horses on 203.15 acres of land. No expansion of the overall footprint is proposed for the MUP. The majority of the work proposed for the equestrian facility includes formalizing existing uses and structures through permits, although some improvements are proposed within the facility. Please see the lists below for the facility's existing components and the proposed facility improvements.

The following existing components are currently located within the area proposed to be covered by the equestrian facility and MUP:

- a. 8 barns
- b. 5 houses (used as employee housing)
- c. 1 manufactured home (used as employee housing)

- d. 5 water wells including 3 well houses
- e. 37 horse pens (covered and uncovered, and of varying sizes)
- f. 1 horse exercise arena
- g. 2 open air training arenas
- h. 14 horse shade structures
- i. 21 pastures

In addition to existing structures, the following proposed improvements are included in the overall site plan for the equestrian facility:

- a. 11 horse shade structures
- b. 1 horse aquatic therapy pool
- c. 1 relocated manufactured home (used as employee housing)
- d. 1 replacement manufactured home (used as employee housing)
- e. 1 replacement equipment maintenance shop

The primary access into the equestrian facility would be from Road A, which would be a new two-lane public road with 40 feet of paved width and a minimum of 62 feet of right-of-way. Secondary access would be from the private segment of Dulin Road at the east end of the equestrian facility.

Grading and Construction

Earthwork is anticipated to consist of 1.9 million cubic yards of even cut and fill. No off-site import or export would be required for the Project. Construction is anticipated to commence in 2022 and be completed by 2029. The Project's anticipated occupancy date is 2030.

Overview of 15183 Checklist

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

General Plan Update Program EIR

The County of San Diego General Plan Update (GPU) establishes a blueprint for future land development in the unincorporated County that meets community desires and balances the environmental protection goals with the need for housing, agriculture, infrastructure, and economic vitality. The GPU applies to all of the unincorporated portions of San Diego County and directs population growth and plans for infrastructure needs, development, and resource protection. The GPU included adoption of new General Plan elements, which set the goals and policies that guide future development. It also included a corresponding land use map, a County Road Network map, updates to Community and Subregional Plans, an Implementation Plan, and other implementing policies and

ordinances. The GPU focuses population growth in the western areas of the County where infrastructure and services are available in order to reduce the potential for growth in the eastern areas. The objectives of this population distribution strategy are to: 1) facilitate efficient, orderly growth by containing development within areas potentially served by the San Diego County Water Authority (SDCWA) or other existing infrastructure; 2) protect natural resources through the reduction of population capacity in sensitive areas; and 3) retain or enhance the character of communities within the unincorporated County. The SDCWA service area covers approximately the western one third of the unincorporated County. The SDWCA boundary generally represents where water and wastewater infrastructure currently exist. This area is more developed than the eastern areas of the unincorporated County, and would accommodate more growth under the GPU.

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

Summary of Findings

The Ocean Breeze Ranch Project is consistent with the analysis performed for the GPU EIR. Further, the GPU EIR adequately anticipated and described the impacts of the Project, identified applicable mitigation measures necessary to reduce Project specific impacts, and the Project implements these mitigation measures (see http://www.sdcounty.ca.gov/PDS/gpupdate/docs/BOS_Aug2011/EIR/FEIR_7.00_-_Mitigation_Measures_2011.pdf for complete list of GPU Mitigation Measures.

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

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

- 1. The Project is consistent with the development density established by existing zoning, community plan or general plan policies for which an EIR was certified.**

The Project would subdivide a 1,402.5-acre property into 396 lots as a Conservation Subdivision, which is consistent with the development density established by the General Plan and the certified GPU EIR. County Subdivision Ordinance Section 81.401(r) calls for residential Projects with lands designated as SR-10, and RL-20 through RL-80 to be designed as conservation subdivision. The Project has been designed as a conservation subdivision but consolidating the Project's development footprint in a way which minimizes impacts to environmental resources per Sec. 81.401(r)(1), with avoided areas set aside from development by conservation easements per Sec. 81.401(r)(1).
- 2. There are no Project specific effects which are peculiar to the Project or its site, and which the GPU EIR Failed to analyze as significant effects.**

The subject property is no different than other properties in the surrounding area, and there are no Project specific effects which are peculiar to the Project or its site. The Project site is located in an area developed with similarly sized, estate residential lots with associated accessory uses.

In addition, as explained further in the 15183 Checklist below, all Project impacts were adequately analyzed by the GPU EIR. The Project could result in potentially significant impacts to Agriculture/Forestry Resources, Biological Resources, Cultural Resources, Hydrology and Water Quality, Land Use and Planning, Mineral Resources, Transportation and Traffic, and Wildfire. However, applicable mitigation measures specified within the GPU EIR have been made conditions of approval for this Project.

3. There are no potentially significant off-site and/or cumulative impacts which the GPU EIR failed to evaluate.

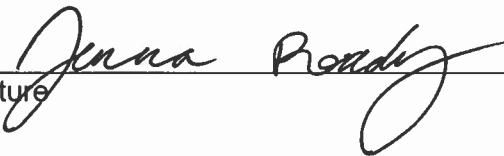
The Project is consistent with the density and use characteristics of the development considered by the GPU EIR and would represent a small part of the growth that was forecast for build-out of the General Plan. The GPU EIR considered the incremental impacts of the Project, and as explained further in the 15183 Exemption Checklist below, no potentially significant off-site or cumulative impacts have been identified which were not previously evaluated.

4. There is no substantial new information which results in more severe impacts than anticipated by the GPU EIR.

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

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

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


Signature

9/19/2019
Date

Jenna Roady
Printed Name

Land Use/Environmental
Planner
Title

CEQA Guidelines §15183 Exemption Checklist

Overview

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

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

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

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

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

Discussion

A Visual Impact Analysis has been prepared by Helix Environmental Planning, August 2019, for the proposed Project. The following discussion has incorporated the analysis from the Visual Impact Analysis.

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

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

As described in the General Plan Update Environmental Impact Report (GPU EIR; County of San Diego 2011), the County contains visual resources affording opportunities for scenic vistas in every community. Resource Conservation Areas (RCAs) are identified within the GPU EIR and are the closest that the County comes to specifically designating scenic vistas. Many public roads in the County currently have views of RCAs or expanses of natural resources that would have the potential to be considered scenic vistas. Numerous public trails are also available throughout the County. New development can often have the potential to obstruct, interrupt, or detract from a scenic vista.

The Project site is located at 5820 West Lilac Road, within the Bonsall and Fallbrook Communities of the unincorporated County of San Diego. The Project site spans across 1,402.52 acres and is located just south of SR-76 and the San Luis Rey River. The I-15 is located approximately 0.3 mile east of the Project site. Both the SR-76 and the I-15 are County designated scenic highways. For further information on scenic highways, refer to response I(b).

A number of RCAs have been identified by the County that are located within approximately 3 miles of the Project site. While the RCAs within a 3-mile radius of the site are generally focused on sensitive habitats, the following are also identified as visual resources: San Marcos Mountain, Gopher Canyon and Lancaster Mountain. Both the San Marcos Mountains and Gopher Canyon are located approximately 3 miles south of the Project site, with Gopher canyon located just north east of the San Marcos Mountains. Lancaster Mountain is located east of the I-15 and north of Woods Valley Road, approximately 1.4 miles east of the Project site. Due to distance, intervening topography and the elevation of the Project site, the Project would not detract from any views of the aforementioned RCAs. In addition, the Project would not be expected to diminish any viewsheds from the RCAs. Because of the distance and intervening topography, viewsheds from the San Marcos Mountains and Gopher Canyon would not be impacted by the Proposed Project. Further, there are no identified County trails on the scenic portion of Lancaster Mountain. The Lancaster Creek trail crosses along the lower elevation of the mountain but would not afford views of the Project site.

Additional trail systems and public parks exist throughout the Project vicinity (figure 3 of the Visual Impact Analysis) that are not designated as a County RCA, however none would provide topographically accessible views to the Project. The County has also identified a number of proposed community trails within the Community Trails Master Plan that would have views of the site based on topography. However, visibility to the site is restricted due to intervening land uses and/or vegetation. Further, where trails are future actions (e.g., the San Luis River South trail that would enter the Project), viewers are not expected to be particularly sensitive to Project changes. Individuals would not be walking/riding immediately adjacent to, or on, site unless the Project is already developed and would therefore not be comparing the views to any existing condition. Moreover, the proposed Project would provide for the protection of 832.7 acres within biological open space and would not be developed, further reducing visibility of the development footprint within the site.

As previously discussed, the GPU EIR determined impacts on scenic vistas to be less than significant with mitigation. As the proposed Project would have a less-than-significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

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

No Scenic Highways designated by Caltrans are in proximity to the Project site. However, the County General Plan identifies roadways that are designated as scenic corridors within the Conservation and Open Space Element and have been included as part of the County Scenic Highway System. Designated scenic roadways located in the vicinity of the Project site include I-15 from Escondido city limits to Riverside County Line, SR-76 from Oceanside city limits to I-15, Mission Road from SR-76 east to Reche

Road, Gird Road from its intersection with SR-76 north to Reche Road and Camino Del Rey from SR-76 to its terminus at Old Highway 395.

No direct views to the Project site are available from South Mission Road, Camino Del Rey, or Gird Road due to constraining intervening topography, structures, and landscaping. Views into the Project site from the SR-76 are also minimal due to the San Luis Rey River dense vegetation. Only peek views, such as roofing, of planning area one (PA1), would be available from certain areas along SR-76 where vegetation thins. The Project site would generally be hidden and these small glimpses of the Project site would not substantially detract from the views available along the SR-76. This is also true for views from the I-15 located 0.3 mile to the east of the Project site. Thick continuous vegetation, as well as intervening topography, provide minimal views of the Project site. In addition, the majority of the proposed development is located on the west end of the 1,402.52 acre site. The most noticeable features from the I-15 (Photo 19 of the Visual Analysis Report) would include intervening land uses located east of the Project site, a recycling facility located off of Old Highway 395, as well as the hills to the north and south of the Project in the background. Although the I-15 serves a large number of viewers, the majority of views of the Project site are obscured or inconsequential.

In addition to the General Plan Scenic Highway System, West Lilac Road is a Mobility Element Road which has been noted as unique and aesthetically important within the Bonsall Community Plan. Views to the Project from most portions of West Lilac Road would be shielded by intervening topography and vegetation. However, along portions of West Lilac Road between Old Highway 395 and its western terminus Camino del Rey, brief views are available into the Project site. These locations would include the following: a peek view of the westernmost corner of the site as a traveler rounds a bend; near the proposed east entrance to the site between Jimdora Way and Redondo Drive (identified as Key View 1 in the Visual Analysis Report); and along the eastern edge of the property where it borders West Lilac Road east of Sullivan Middle School. Structures which would be available to be seen from the SR-76 would be built consistent with the Bonsall Community Plan and Design Guidelines. This includes being constructed of muted tones (creams, browns, tans, and taupes) to blend in with their surroundings as well as incorporation of various textures and elements that would provide visual interest, and minimize monotony of structures. These would include varied roof and gable lines, porches/recessed front doors, window treatments (e.g., decorative shutters, recessed windows), exterior cladding materials and textures, sectional garage doors, articulations, massing, and other architectural design elements. In addition, Although the built nature of the Project would vary from the existing condition, it is not expected to demonstrate character that is inconsistent with other residential uses in the overall area.

Lastly, no identified visual resources such as unique topographic features have been identified on-site. It is noted that rock outcroppings on-site would generally be retained in the approximately 61 percent of site acreage within the Biological Open Space easement. Historic resources have also been identified on-site as a cluster of 5 structures in conjunction with the equestrian use, but would be preserved in perpetuity.

As previously discussed, the GPU EIR determined impacts on scenic resources to be less than significant with mitigation. As the proposed Project would have a less-than-significant impact for the reasons detailed above, the Project would be consistent with

the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 1(c) The GPU EIR concluded this impact to be significant and unavoidable. Visual character is the objective composition of the visible landscape within a viewshed. Visual character is based on the organization of the pattern elements line, form, color, and texture. Visual character is commonly discussed in terms of dominance, scale, diversity and continuity. Visual quality is the viewer's perception of the visual environment and varies based on exposure, sensitivity and expectation of the viewers.

The existing visual character and quality of the Project surroundings are characterized by the San Luis Rey River valley and surrounding hills, rural residential development, and agricultural use types. The existing setting includes uses to large lot/estate homes, with some visible agricultural or equestrian elements. Large expanses of retained open space (primarily of scrub habitats) on hillsides, groves and landscaping provide visually unifying natural elements as they are located within and around structural development. Viewer groups of the Project site would include motorists, and to a lesser extent recreationalists, such as walkers, bikers and hikers. As indicated in response 1(a), the viewer exposure to the site is limited due to a number of factors including distance, as well as intervening topography, vegetation and structures.

In addition, the Project within the landscape would not detract from or contract with the existing visual character and/or quality of the surrounding area for the following reasons: consistency with the General Plan Density allowance on-site, conformance with the Bonsall Community Plan and Bonsall Design Guidelines, location of development within the site surrounded by vast open areas preserved within biological open space easements (approximately 61% of the site) and overall relatively low viewer exposure within the site of the proposed development. As discussed in section 1(b), the Project would also use muted tones (creams, browns, tans, and taupes) to blend in with the surroundings as well as incorporate various textures and elements to minimize monotony of structures.

Further, the overall bulk and scale of the proposed buildings would be minimized and rendered more visually interesting through breaking up façades using: vertical and horizontal elements; incorporating variation in the roofline through the use of gables, overhangs, rafter tails, etc.; and use of accent colors on trim, shutters, and architectural elements to provide visual interest and character. Roofs would uniformly be of concrete tiles in reds, browns and dark greys, and exterior façades and design elements would be in greys and earth tones to visually blend with the surrounding area. The Project would incorporate forms indicative of traditional farmhouse and Craftsman style architecture with porches, dormers, and simple roof shapes. Thus, the proposed Project would not substantially degrade the existing visual character or quality of the site and its surroundings.

As previously discussed, the GPU EIR determined impacts on visual character or quality to be significant and unavoidable. However, the Project would have a less-than-significant impact with no required mitigation for the reasons detailed above. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 1(d) The GPU EIR concluded this impact to be significant and unavoidable. The Project would use outdoor lighting but is not located within Zone A of the County of San Diego

Light Pollution Code (within twenty miles of the Mount Laguna Observatory or the Palomar Observatory). The Project is located within Zone B of the Light Pollution Code (at least twenty miles of the Mount Laguna Observatory or the Palomar Observatory) and would not adversely affect nighttime views or astronomical observations because the Project would be required to conform to the Light Pollution Code (Section 51.201-51.209). This would include the utilization of the Zone B lamp type and shielding requirements per fixture and hours of operation limitations for outdoor lighting and searchlights. The Code was developed by the County in cooperation with lighting engineers, astronomers, and other experts to effectively address and minimize the impact of new sources light pollution on nighttime views. Compliance with the Code would be required prior to issuance of a building permit. Thus, the proposed Project would not create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area.

As previously discussed, the GPU EIR determined impacts from light or glare to be significant and unavoidable. However, the proposed Project would have a less-than-significant impact with no required mitigation for the reasons detailed above. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

Conclusion

With regards to the issue area of Aesthetics, the following findings can be made:

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

2. Agriculture/Forestry Resources

– Would the Project:

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

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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c) Conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland zoned Timberland Production?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
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d) Result in the loss of forest land, conversion of forest land to non-forest use, or involve other changes in the existing environment, which, due to their location or nature, could result in conversion of forest land to non-forest use?

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

Discussion

The Project has incorporated design features from the Guidelines for Determining Significance, Agricultural Resources. Design features are measures the applicant willingly incorporates into the Project that is then factored into the analysis of potential impacts:

Design Considerations

The following is a list of design considerations for the Project:

- Incorporate compatibility buffers to separate agricultural parcels from non-agricultural land uses, potentially including measures such as natural and/or planted vegetation, physical barriers (e.g., roads or walls), and easements that restrict incompatible uses (with the referenced Guidelines identifying compatibility buffers as "...the primary tool to increase compatibility between agricultural resources and non-agricultural uses.").
- Incorporate appropriate land use transitions such as reduced density near adjacent farmland to decrease the number of residents that abut farms.
- Incorporate appropriate fencing or barriers to minimize trespass.

2(a) The GPU EIR concluded this impact to be significant and unavoidable. According to the Agricultural Resources Report (Helix Environmental Planning, August 2019), the Project site is an important agricultural resource. The County uses the Local Agricultural Resource Assessment (LARA) model to assess the relative value of agricultural resources in the County of San Diego. The LARA Model resulted in a high rating for climate, water, surrounding land use and land use consistency, and a moderate rating for soil quality and topography. Based on the ratings of the factors above, the site was determined to be an important agricultural resource pursuant to the LARA Model. Specific documentation of the LARA model can be found in the Guidelines for Determining Significance for Agricultural Resources.

Direct Impact Analysis

Pursuant to the Agricultural Resources Report and LARA Model, the Project site has land designated as Farmland of Local (205.47 acres), Statewide (230.50 acres), Prime (120 acres), and Unique (239.91 acres) candidate soils as defined by the State Farmland Mapping and Monitoring Program (FMMP). Portion of the Project site have been used for cattle ranching in the late 19th Century, with cultivation of various crops beginning in the 1930s and expanding through the 1970s. The agricultural use varied through the years and were ultimately burned in the 2017 Lilac Fire. No agricultural uses are currently taking place on-site today. However, due to the history of agricultural use on-site and significant soils, the Project would be required to mitigate for 244 acres of direct on and off-site agricultural resources at a 1:1 ratio pursuant to the Guidelines for

Determining Significance for Agricultural Resources. To ensure the agricultural resources would remain viable for future use, the dedication of an offsite agricultural easement would be required as a condition of the Project.

The County has an agricultural conservation program known as the Purchase of Agricultural Conservation Easement (PACE) Program, which was conceptually identified in the GPU EIR as mitigation measure Ag-1.4. The PACE Program promotes the long term preservation of agriculture in the County of San Diego. Under the PACE Program, willing agricultural property owners are compensated for placing a perpetual easement on their property that limits future uses to agriculture. As a result, the agricultural land is preserved and the property owner receives compensation making the land's continued use for agriculture more viable. The PACE Program Mitigation Bank and Credits was adopted in 2014. With this expanded component, easement lands acquired by the County under the PACE Program can be utilized as off-site mitigation for agricultural impacts resulting from private development Projects. The applicant has the option to mitigate through a separate entity, to enter into PACE, or a combination of both. With the incorporation of the below mitigation measure, the proposed Project would reduce direct impacts to farmland.

Mitigation

The following mitigation measure would be required for the Project, which is consistent with General Plan mitigation measure Ag-1.4:

Agricultural Preservation

- The Project applicant shall provide 244 acres of mitigation to address identified direct impacts to on- and off-site agricultural resources from the proposed development, through a combination of either: (1) acquiring 244 acres of pertinent agricultural resource credits through the County PACE Program; or (2) purchasing off-site agricultural lands or easements totaling 244 acres that conform with the County Agricultural Guidelines (pursuant to County approval).

Indirect Impact Analysis

The proposed Project would place development in proximity to land that has been designated as Farmland of Local (334.06 acres), Statewide (61.44 acres), Prime (24.09 acres) and Unique (574.97 acres) candidate soils as defined by FMMP. Portions of the important agricultural resources surrounding the Project site are located within existing agricultural operations. The operations would include relatively large-scale orchards and commercial nurseries, as well as smaller areas of row-field crops, greenhouses, and vineyards. Based on these conditions, the proposed Project has the potential to result in interface conflicts with the nearby agricultural operations. In order to reduce any interface conflicts with an off-site agricultural resource, design considerations, including compatibility buffers, fencing and land use transitions have been incorporated from the Guidelines for Determining Significance. For a list of Project design features, please see above in analysis.

As previously discussed, the GPU EIR determined impacts from direct and indirect conversion of agricultural resources to be significant and unavoidable. However, the proposed Project would have a less-than-significant indirect impact and would incorporate the GPU EIR mitigation measure Agr-1.4 for a less-than-significant direct impact with mitigation. Therefore, the Project would be consistent with the analysis provided within the GPU EIR.

- 2(b) The GPU EIR concluded this impact to be less than significant with mitigation. The Project site is not located within a Williamson Act contract or an agricultural preserve. Two active Williamson Act Contracts (Contract Nos. 77-48 and 78-05) are located approximately 0.7 mile north and 0.4 mile northeast of the Project site. No associated interface conflicts or impacts are anticipated from implementation of the proposed Project due to intervening distances, as well as the type of crop. Both contracts consist of orchards which are generally compatible with most rural residential uses pursuant to the Guidelines of Determining Significance, Agricultural Resources.

However, portions of the Project site are zoned for agriculture. In addition, a number of surrounding properties within a quarter mile radius of the Project site, particularly areas to the south, include Zoning designations (e.g., A 70) and related conditions (undeveloped areas) that would potentially accommodate additional agricultural uses under County Jurisdiction. While these undeveloped properties could potentially be subject to future agricultural use, associated significant interface conflicts or impacts related to the proposed Project residential uses are not anticipated based on the following considerations:

- Off-site land use and zoning designations are not exclusive to agriculture, with agricultural uses in these areas typically associated with additional uses, such as estate residential development (with numerous areas of such mixed agricultural/residential use already present). In addition the County Guidelines for Determining Significance for Agricultural Resources permit and anticipate the co-existence of single-family estate housing and high-value crop production, such as orchards
- The Proposed Project would include required conformance with the County Agricultural Enterprises and Consumer Information Ordinance (County Code Section 63.401 et seq.). This Ordinance is intended primarily to identify and limit the circumstances under which agricultural activities may constitute a nuisance. The ordinance notes that agricultural uses may be converted to other uses or zones, whether or not the parcels are zoned for agricultural uses. It prohibits land use changes in the vicinity of existing agricultural uses, however (when such uses have been established for a minimum of 3 years), that would result in the existing agricultural uses to be deemed a nuisance if they were not a nuisance prior to the proposed land use change. In addition, the Ordinance requires prospective property buyers (new or resale buyers) in unincorporated areas to be notified that agricultural activities may occur in the vicinity, and that associated inconveniences, irritations or discomforts could potentially result.

As previously discussed, the GPU EIR determined impacts from land use conflicts to be less than significant with mitigation. As the proposed Project would have a less-than-significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 2(c) The GPU EIR concluded this impact to be significant and unavoidable. The project site including any offsite improvements do not contain any forest lands as defined in Public Resources Code section 12220(g), therefore Project implementation would not result in the loss or conversion of forest land to a non-forest use. The outer edge of the Cleveland National Forest is located approximately 9.0 mile to the east of the Project

site. Thus, due to distance, the Project would have no impact on the Forest. In addition, the County of San Diego does not have any existing Timberland Production Zones.

As previously discussed, the GPU EIR determined impacts from direct and indirect conversion of agricultural resources (including forest resources), to be significant and unavoidable. However, the Project would have a less-than-significant impact to forest resources. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 2(d) The GPU EIR concluded this impact to be significant and unavoidable. As indicated in response 2(c), the Project site, or any off-site improvements, are not located near any forest lands. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.
- 2(e) The GPU EIR concluded this impact to be significant and unavoidable. No agricultural operations are currently taking place on the Project site. In addition, no impacts would occur in association with interface conflicts due to Project design features. Please refer to response 2(a) and 2(b) for a discussion on off-site agricultural resources, interface conflicts and design features.

As previously discussed, the GPU EIR determined impacts from direct and indirect conversion of agricultural resources (including forest resources) to be significant and unavoidable. The proposed Project also determined impacts to agricultural resources to be potentially significant. However, the proposed Project would have a less-than-significant indirect impact and would incorporate the GPU EIR mitigation measure Agr-1.4 for a less-than-significant direct impact with mitigation. In addition, the Project would have a less than significant impact from land-use conflicts. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

Conclusion

With regards to the issue area of Agricultural/Forestry Resources, the following findings can be made:

1. No peculiar impacts to the Project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. Feasible mitigation measures contained within the GPU EIR (Agr-1.4) would be applied to the Project. This mitigation measure, detailed above, requires the project applicant shall provide 244 acres of mitigation to address identified direct impacts to on- and off-site agricultural resources from the proposed development, as fully detailed above.

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

Discussion

An Air Quality Assessment was prepared for the Project by Ldn Consulting, Inc. on July 23, 2019.

The proposed Project has incorporated design features, which have been included within the below analysis:

- The Project would only install Natural Gas fireplaces within all 396 residential units.
- The Project would utilize architectural coatings compliant with San Diego Air Pollution Control District (SDAPCD) Rule 67 (SDAPCD, 2015).

3(a) The GPU EIR concluded this impact to be less than significant. The RAQS and SIP are based on General Plans within the region and the development assumptions contained within them. The proposed Project is for the development of 396 residential lots and an existing equestrian facility with proposed improvements. The density allowed on the Project site per the County General Plan and the Zoning Ordinance is 402 units. Thus, the proposed Project is consistent with the density allowed under the General Plan and would not conflict with the RAQS or SIP.

As previously discussed, the GPU EIR determined impacts on air quality plans to be less than significant. As the proposed Project would have a less-than-significant for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

3(b) The GPU EIR concluded impacts to be significant and unavoidable.

The air quality analysis takes into account both the construction and operational phases of the Project.

Construction

Grading of the proposed Project would commence in year 2022 with construction ending in year 2029. Approximately 1.9 million cubic yards of balanced cut and fill would be required for the development. CalEEMod 2016.3.2 was utilized for all calculations and included manual updates to the model to reflect the usage of SDAPC Rule 67 paint VOC limits as well as design features to use Tier 3 or better ratings with diesel particulate filters for all diesel equipment used during grading and construction. The model also incorporated the required hauling of 945,000 cubic yards to PA-1 and PA-2 as well as the three separate blasts to occur on-site.

The model results for grading and construction concluded that the Project would not exceed County screening level thresholds with the implementation of Project conditions:

- The proposed Project would utilize Tier 3 or better U.S.EPA/CARB-certified construction equipment with diesel particulate filters
- The proposed Project would utilize no more than six (6) tons of ammonium nitrate per blast and would not blast an area greater than 20,000 square feet per day.

In addition, all grading operations associated with the construction of the Project would be subject to the Grading Ordinance, which requires the implementation of dust control measures. Moreover, emissions from the construction phase would be temporary and localized.

Operation

Operational emissions were calculated using CalEEMod 2016.3.2, an air quality and GHG emissions software model. The model was run for the winter and summer scenarios to determine operational impacts for the buildout year of full operations. Operational emissions would primarily occur from vehicle trips from residents that would occupy the site. The vehicle trips generated from the Project would result in 3,990 Average Daily Trips. Based on those calculations, the proposed Project would not exceed SDAPCD operational air quality significance thresholds with the implementation of Project design features.

Projects that generate traffic may result in the formation of locally high concentrations of CO, known as CO "hot spots". An analysis for Carbon Monoxide (CO) hotspots was included within the Air Quality Analysis and was based upon the results of direct and cumulative impacts to intersection included within the Traffic Study. For the majority of the intersections analyzed, the Project was found to not result in a CO hotspots due either to its trip generation or peak hour trips. One specific intersection (Highway 76/ Olive Hill Road/ Camino Del Rey) did result in over 5,074 vehicles during the PM peak-hour of which 80 and Project related. To determine if the intersection would result in a CO hotspot, the EMFAC2014 model was used. Based on the model of the worst case intersection having the highest number of peak hour vehicles and the highest number of Project added vehicles, the Project would produce less than significant CO impacts according to the San Diego Air Pollution Control District standards. Impacts would be less than significant.

As previously discussed, the GPU EIR determined significant and unavoidable impacts to air quality violations. However, the Project would have a less-than-significant impact to air quality violations with the incorporation of Project conditions for construction. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 3(c) The GPU EIR concluded this impact to be significant and unavoidable. The Project would contribute to particulate pollution (PM10), nitrogen oxide gases (NOx), and volatile organic compounds (VOCs) emissions from construction/grading activities; however, the incremental increase would not exceed established screening thresholds (see question 3(b) above).

As previously discussed, the GPU EIR determined significant and unavoidable impacts to non-attainment criteria pollutants. However, the Project would have a less than significant impact to non-attainment criteria pollutants with the incorporation of Project conditions. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 3(d) The GPU EIR concluded this impact to be significant and unavoidable. The Project would introduce additional residential homes which are considered new sensitive receptors and an equestrian facility; however, the Project site is not located within a quarter-mile of any identified point source of significant emissions. Similarly, the Project does not propose uses or activities that would result in exposure of these sensitive receptors to significant pollutant concentrations and would not place sensitive receptors near any CO hotspots.

As previously discussed, the GPU EIR determined significant and unavoidable impacts to sensitive receptors. However, the Project would have a less than significant impact to sensitive receptors. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 3(e) The GPU EIR concluded this impact to be less than significant. The proposed Project includes an existing equestrian facility which would continue to operate as a separate facility. These equestrian activities would generate equestrian odors which cannot be avoided. Each residential unit sold within the Project site would require full disclosure in perpetuity of any equestrian activities taking place within the Project site. In addition, a Vector Control Plan and a Manure Management Plan have been prepared for the equestrian facility. The facility would be required to follow all applicable odor and vector control guidance by both the San Diego Air Pollution Control District and the County of San Diego.

The Project could also produce objectionable odors during construction and operation of the residential components; however, these substances, if present at all, would only be in trace amounts (less than 1 µg/m³). Therefore, the Project would not create objectionable odors affecting a substantial number of people.

As previously discussed, the GPU EIR determined less than significant impacts from objectionable odors. As the proposed Project would have a less-than-significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

Conclusion

With regards to the issue area of Air Quality, the following findings can be made:

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

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

Discussion

Biological resources on the Project site were evaluated in a Biological Resources Report prepared by Helix Environmental Planning, Inc. (HELIX), dated August 7, 2019. General biological surveys of the Project site were conducted between 2013 and 2016 and mapping for the offsite Camino del Rey Project component was conducted in 2019. A formal jurisdictional delineation, rare plant surveys, habitat assessments for burrowing owl (*Athene cunicularia*), Stephens' kangaroo rat (*Dipodomys stephensi*), arroyo toad (*Anaxyrus californicus*), Hermes copper butterfly (*Lycaena hermes*), coastal cactus wren (*Camphylorhynchus brunneicapillus*), and coastal California gnatcatcher (*Polioptila californica californica*), protocol-level surveys for Hermes copper butterfly, burrowing owl, coastal California gnatcatcher, least Bell's vireo (*Vireo bellii pusillus*), southwestern willow flycatcher (*Empidonax traillii extimus*), and Stephens' kangaroo rat and focused surveys for western spadefoot (*Spea hammondi*) were also conducted.

4(a) The GPU EIR concluded this impact to be significant and unavoidable.

Habitat Types

A total of 22 vegetation community/land cover types occur within the Project site including southern cottonwood willow riparian forest, southern willow scrub, mule fat scrub, freshwater marsh, herbaceous wetland, tamarisk scrub, open water/freshwater pond, coast live oak woodland, Diegan coastal sage scrub, flat-topped buckwheat scrub, coastal sage-chaparral scrub, southern mixed chaparral, non-native grassland, pasture, row crops, agricultural pond, eucalyptus woodland, orchard, fallow orchard, non-native vegetation, disturbed habitat, and developed lands.

The Project would result in impacts to southern willow scrub, mule fat scrub, tamarisk scrub, coast live oak woodland, Diegan coastal sage scrub, flat-topped buckwheat scrub, non-native grassland and pasture.

Special Status Plant Species

Four special status plant species were observed on the Project site, which include Brewer's Calandrinia (*Calandrinia breweri*), Delicate Clarkia (*Clarkia delicata*), Graceful Tarplant (*Holocarpha virgata* ssp. *elongata*), and Smooth Tarplant (*Centromadia pungens* ssp. *laevis*). Apart from the species observed on site, no additional special status plant species were considered to have high potential to occur based on results of focused surveys and analysis of species with potential to occur in the region.

No impacts would occur to County List A or B plant species. The Project would result in impacts to one County List D species: graceful tarplant. No other County Group C or D plant species would be impacted by the Project.

Special Status Animal Species

Twenty-seven special status animal species have been observed or detected on or directly adjacent to the Project site or flying over the site. The Project would result in impacts to suitable breeding or foraging habitat for 21 special status animal species observed or detected on or adjacent to the site, including coastal California gnatcatcher, least Bell's vireo, northern harrier, southern California rufous-crowned sparrow, Cooper's hawk, California horned lark, red-shouldered hawk, vermilion flycatcher, western bluebird, white-tailed kite, loggerhead shrike, white-faced ibis, turkey vulture, barn owl, snow goose, Canada goose, great blue heron, western spadefoot, coastal western whiptail, yellow warbler, and northwestern San Diego pocket mouse.

Mitigation Measures

As considered by the GPU EIR, Project impacts to sensitive habitat and/or species would be mitigated through ordinance compliance and through implementation of mitigation measures Bio 1.6 and Bio 1.7.

Specific mitigation measures BIO-1a through BIO-5 as detailed in the Biological Resources Report dated August 7, 2019, are also recommended for the Ocean Breeze Ranch Project as a condition of approval and are consistent with mitigation in the GPU EIR. These mitigation measures include the following:

- The applicant shall mitigate for the impacts to the California Gnatcatcher Habitat through preservation of 101.7 acres of Diegan Coastal Sage Scrub on-site within a biological open space easement
- The applicant shall mitigate for impacts to the least Bell's vireo foraging habitat through one or a combination of the following: on- and/or off-site establishment, re-establishment, rehabilitation, and/or enhancement of riparian habitat; and/or off-site purchase of riparian habitat mitigation credits at an approved mitigation bank, such as the San Luis Rey Mitigation Bank, or other location deemed acceptable by the County and Regulatory Agencies
- A qualified biologist shall conduct pre-construction surveys for Stephens' kangaroo rat. In the event of a positive survey, the Project proponent would coordinate with the Wildlife Agencies and the County PDS
- The applicant shall conform to the breeding season avoidance measures pursuant to the Migratory Bird Treaty Act (MBTA) occurring January 15 to July 15 for raptors and February 15 to August 31 for general nesting birds
- Temporary toad exclusionary fencing shall be installed prior to initiation of clearing or grading activities. Translocation surveys shall also be conducted by a qualified biologist to relocate arroyo toad (if present).
- Permanent toad exclusionary fencing shall be installed following the completion of construction activities along the northern limits of Planning Area 2 and portions of Planning Area 3, or as determining by the USFWS during Section 7 Consultation for CWA Section 404 permitting.
- Suitable foraging and aestivation habitat for arroyo toad and western spadefoot along the northern Project boundary and along the eastern riparian corridor shall be conserved within a biological open space easement. A limited use easement shall also be placed over pastures within the equestrian facility.
- The Project shall not impede flows from the eastern riparian corridor leading offsite to the Caltrans mitigation parcel. In conjunction with the improvements to Dulin Road, hydrologic connectivity under the road at the eastern riparian corridor shall be maintained by construction of box culverts sized to adequately convey flow volumes, as determined through civil engineering design.
- Concurrent with or prior to the initiation of Project construction, areas adjacent to the eastern riparian corridor that are currently in row crops would be planted/seeded with coastal sage scrub species, with the goal of improving the habitat quality of the wetland buffer. Monitoring and maintenance would be incorporated into the restoration effort.
- The applicant shall mitigate for impacts to non-native grassland through on-site preservation of 18.8 acres of non-native grassland within a biological open space easement.

- The applicant shall mitigation for impacts to pasture through on-site preservation of 29.3 acres of grassland habitat and/or other like-functioning habitat within a biological open space easement.

As previously discussed, the GPU EIR determined impacts to special status species as significant and unavoidable. The Project also determined impacts to be significant. However, the proposed Project would incorporate the GPU EIR mitigation measures Bio 1.6 and Bio 1.7 (as well as Project specific mitigation measures consistent with the GPU EIR) for a less than significant impact with mitigation. Therefore, the Project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 4(b) The GPU EIR concluded this impacts to be significant and unavoidable. Riparian habitat and other sensitive natural communities on the Project site were evaluated in a Biological Resources Report prepared by Helix Environmental Planning, Inc. (HELIX), dated August 7, 2019. As detailed in 4(b) above, the Project would result in impacts to sensitive natural communities. The Project would also result in impacts to jurisdictional wetlands and riparian habitats as defined by the United States Army Corps of Engineers (USACE), California Department of Fish and Wildlife (CDFW), and/or County, including 0.01 acre of southern willow scrub, 0.17 acre of mule fat scrub, and less than 0.01 acre tamarisk scrub. The USACE non-wetland waters and CDFW unvegetated stream channel also would be impacted. Impacts to jurisdictional waters and wetlands include 0.20 acre of USACE non-wetland waters of the U.S., 0.40 acre of CDFW jurisdictional areas (including 0.19 acre of vegetated habitat and 0.21 acre of unvegetated stream channel), and 0.19 acre of County RPO wetland.

Mitigation Measures

As considered by the GPU EIR, Project impacts to riparian habitat or other sensitive natural community would be mitigated through ordinance compliance and through implementation of mitigation measures Bio 1.6, Bio 1.7, and Bio-2.2 through Bio-2.4.

Specific mitigation measures BIO-6a through BIO-10b as detailed in the Biological Resources Report dated August 7, 2019 are also recommended for the Ocean Breeze Ranch Project and are consistent with mitigation in the GPU EIR. A Conceptual Upland Restoration Plan (HELIX 2019) and Conceptual Wetland Restoration Plan (HELIX 2019) have been prepared for the Project. These mitigation measures include the following:

- Impacts to southern willow scrub, mule fat scrub, and tamarisk scrub would be mitigated through on- and/or off-site establishment, re-establishment, rehabilitation, and/or enhancement of 0.57 acre of riparian habitat; and/or off-site purchase of riparian habitat mitigation credits
- Impacts coast live oak woodland and oak root protection zones shall occur on-site within a biological open space easement.
- Impacts to Diegan coastal sage scrub and flat-topped buckwheat scrub shall occur on-site within a biological open space easement.
- Impacts to non-native grassland shall occur on-site within a biological open space easement.
- Impacts to USACE jurisdictional non-wetland waters of the U.S. would be mitigated through on- and/or off-site establishment, re-establishment, rehabilitation, and/or enhancement of waters of the U.S.; and/or off-site purchase of waters of the U.S. credits

- Impacts to RPO wetland (southern willow scrub, mule fat scrub, and tamarisk scrub) would be mitigated at a 3:1 ratio with at least 1:1 creation, for a total mitigation requirement of 0.57 acre for County RPO wetlands.
- A Resource Management Plan (RMP) would be prepared for the on-site biological open space.
- A 100-ft wide limited building zone easement extending outward from the edge of the biological open space easement would be dedicated.
- A wetland revegetation plan for impacts to wetland habitat and jurisdictional waters to be submitted and approved by the County (wetland impacts only) and USACE, CDFW, and RWQCB (impacts to waters of the U.S. and CDFW wetlands).
- An upland revegetation plan for impacts to sensitive upland habitat would be prepared and approved by the County and Wildlife Agencies (USWFS and CDFW).
- Vegetation communities outside of the impact footprint shall be avoided during construction, environmental fencing (including silt fencing where determined necessary by the SWPPP), would be installed at the edges of the impact limits prior to initiation of grading. All construction staging shall occur within the approved limits of construction.
- A qualified biologist would monitor the installation of environmental fencing, would conduct a pre-construction environmental training session for construction personnel, and would monitor vegetation clearing, grubbing, and grading activities.

As previously discussed, the GPU EIR determined impacts to riparian habitat and other sensitive natural communities as significant and unavoidable. The proposed Project also determined impacts to be significant. However, the proposed Project would incorporate the GPU EIR mitigation measures Bio 1.6, Bio 1.7, and Bio 2.2 through Bio 2.4 (as well as Project specific mitigation measures consistent with the GPU EIR) for a less than significant impact with mitigation. Therefore, the Project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 4(c) The GPU EIR concluded this impact to be less than significant with mitigation. Impacts to jurisdictional waters and wetlands would occur in order to accommodate necessary road crossings. Mitigation would occur through a combination of on- or off-site creation, restoration, enhancement, and/or purchase of credits at an approved wetland mitigation bank.

No federal wetlands as defined by Section 404 of the Clean Water Act would be impacted by the Project, however, 0.20 acre of non-wetland waters of the U.S. would be impacted. The impact to non-wetland waters of the U.S. would be potentially significant. Implementation of mitigation, as detailed in section 4b above, would reduce the impact to less than significant.

In addition, 0.40 acre of wetlands and waters under CDFW jurisdiction, and 0.19 acre of County RPO wetland would be impacted. These impacts to CDFW and RPO wetlands would be potentially significant. Implementation of mitigation, as detailed in section 4b above, would reduce these impacts to less than significant.

The Project requires preparation of a wetland revegetation plan for impacts to wetland habitat and jurisdictional waters to be approved by the County (wetland impacts only) and USACE, CDFW, and RWQCB (impacts to waters of the U.S. and CDFW wetlands) as detailed in section 4b above.

Mitigation Measures

As considered by the GPU EIR, Project impacts to jurisdictional wetlands and waters would be mitigated through ordinance compliance and through implementation of mitigation measures Bio 1.6, Bio 1.7, and Bio-2.2 through Bio-2.4.

Specific mitigation measures BIO-7a through BIO-7c as detailed in the Biological Resources Report dated August 7, 2019 are also recommended for the Ocean Breeze Ranch Project; the specific mitigation measures listed below are consistent with mitigation in the GPU EIR. These mitigation measures include the following:

- Impacts to USACE jurisdictional non-wetland waters of the U.S. would be mitigated through on- and/or off-site establishment, re-establishment, rehabilitation, and/or enhancement of waters of the U.S.; and/or off-site purchase of waters of the U.S. credits
- Impacts to southern willow scrub, mule fat scrub, and tamarisk scrub would be mitigated through on- and/or off-site establishment, re-establishment, rehabilitation, and/or enhancement of 0.57 acre of riparian habitat; and/or off-site purchase of riparian habitat mitigation credits
- Impacts to RPO wetland (southern willow scrub, mule fat scrub, and tamarisk scrub) would be mitigated at a 3:1 ratio with at least 1:1 creation, for a total mitigation requirement of 0.57 acre for County RPO wetlands.
- A wetland revegetation plan for impacts to wetland habitat and jurisdictional waters to be submitted and approved by the County (wetland impacts only) and USACE, CDFW, and RWQCB (impacts to waters of the U.S. and CDFW wetlands).

The Project would not result in impacts to federal wetlands; however, the Project would impact non-wetland waters of the U.S., CDFW streambed, and County RPO wetlands. With the implementation of mitigation measures BIO-7a, BIO-7b, BIO-7c, and BIO-9a, as summarized above, these impacts would be reduced to less than significant.

As previously discussed, the GPU EIR determined impacts to federally protected wetlands as less than significant with mitigation. The Project determined impacts to federally protected wetlands as potentially significant. However, the proposed project would incorporate the GPU EIR mitigation measures Bio 1.6 and Bio 1.7 (as well as Project specific mitigation measures consistent with the GPU EIR) for a less than significant impact with mitigation. Therefore, the Project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 4(d) The GPU EIR concluded this impact to be significant and unavoidable. The Project's development footprint would be concentrated in previously disturbed areas, conserving native habitat to the extent feasible. Most of Project's proposed development is within lands that have been altered by decades of agricultural and equestrian uses. Only 72.1 acres (22 percent) of the 327.7 acres of on- and off-site impact are within native habitat or naturalized grassland.

The majority of native habitat present on the Project site would be conserved within the 832.7-acre biological open space easement, including 467.8 acres of Diegan coastal sage scrub. The majority of proposed biological open space is concentrated in a wide band of native scrub and woodland habitats across the eastern hills and southern portions of the Project site. Biological open space includes several hilltops and ridgelines that provide long lines-of-sight for birds and mammals. The Project would also increase

the viability of north-south wildlife movement on the Project site by revegetating the wetland buffer along the eastern riparian corridor from disturbed agriculture lands to sage scrub. Although portions of the biological open space in the eastern hills may ultimately be sold to another entity, any such sale would only be for preservation/conservation of habitat, thus maintaining the continuity of open space and wildlife connectivity through the area.

The wide swath of proposed on-site biological open space ranges in width from over 900 ft to approximately 3,000 ft and contains over three linear miles of biological open space in an east-west direction across the Project site. The eastern 2.5 miles of biological open space are uninterrupted, while the western 0.5 mile is interrupted by proposed development and associated access roads. Proposed development is not expected to substantially interfere with the linkage, as lines-of-sight are maintained across the roads.

The San Luis Rey River and associated riparian areas function as a wildlife linkage just north of the Project site, and on-site riparian corridors function as local movement corridors for wildlife. However, the western riparian corridor is not contiguous across the site, and both riparian corridors are already constrained by existing equestrian and agricultural operations on site. The on-site portion of the linkage is already constrained by existing equestrian and agriculture uses, as well as by existing semi-rural development to the south of the site.

The Project would introduce new barriers on the Project site itself, but the impediments would not substantially interfere with access due to alternate travel routes in the local area, particularly the east-west corridor along the San Luis Rey River. Adequate space and connectivity of habitat would remain in the local area, and local and regional movement functions would continue along the river north of the site and within the southern range of hills on site. In conclusion, although site development would introduce a new impediment to local wildlife movement within the site, the effects would not be substantially adverse and no artificial corridors would be created.

Large estate lots to be developed in the central portion of the site are within existing agricultural lands on the lower hill slopes and would not block visual continuity within the linkage. Planning Area 2 is in the lower valley area within areas currently used for equestrian purposes and also would not block visual continuity within the linkage. Project development in the west-central portion of the site (Planning Area 1) would occur partially within native habitats on the hills. However, adequate visual continuity would be maintained in this area, as the residential lots are situated more than 900 ft to the north of the southern property boundary, with biological open space occurring in a wide band to the south, linking the east and west portion of the site. As such, the Project would not impair visual continuity within corridors or linkages in the local area and impacts would be less than significant.

Project noise is not anticipated to adversely impact wildlife corridors/linkages as on-site riparian areas have been appropriately buffered, and development has been setback from the San Luis Rey River to the extent feasible. In addition, ongoing equestrian and agriculture activities generate noise in portions of the site, including noise from mowing the pastures and noise from tilling and harvesting row crops, as well as maintenance of the orchards; thus, some level of noise disturbance already exists on site. The off-site linkage between SR 76 south to the Project site ranges in width from approximately 1,500 to 3,000 ft, which is sufficiently wide to maintain wildlife corridor functions without being significantly affected by noise generated on the Project site.

Nighttime lighting is not anticipated to adversely impact the linkage or on-site movement corridors. All project-related lighting would be required to adhere to Division 9 of the San

Diego County Light Pollution Code. Project lighting adjacent to undeveloped habitat would be of the lowest illumination allowed for human safety, selectively placed, shielded, and directed away from such habitat. No significant impact to wildlife corridors or linkages resulting from lighting or noise would occur.

Although the Project would impact areas used by coastal California gnatcatcher and other species for foraging and breeding, the Project would not impede wildlife access to on-site areas necessary for reproduction, as sufficient habitat to support these species would be conserved on site, and connections to off-site lands also would be maintained. Preservation of habitat would continue to provide foraging and breeding habitat for a variety of species, including coastal California gnatcatcher.

Project construction would lessen the area available for terrestrial wildlife movement in a direct north-south route in the western portion of the site between the San Luis Rey River (off site to the north), across the westernmost pasture and continuing to the southwestern range of hills. However, this route is likely to be used primarily by commonly occurring, suburban-adapted larger wildlife species, such as coyotes, which are frequently observed throughout the site and do not avoid the wide open, exposed pasture areas that make up the bulk of land between the southwestern hills and offsite areas along the river.

Mule deer and mountain lion are the largest mammal species that could potentially occur on site. While suitable expanses of habitat exist for deer and mountain lion to move through the area, these species are considered unlikely to be utilizing the Project site based on lack of observation of these species or evidence of these species (e.g., scat, shed antlers, deer kill, etc.) during numerous field visits and discussions with on-site ranch staff who have lived on the site for many years. If these species were to occur in the area, they are most likely to use the San Luis Rey River corridor and could potentially use the on-site eastern hills which are more remote than the remainder of the site, as large portions of the site have been subjected to human-related disturbances over many years.

Movement of other large- to medium-sized mammals, such as bobcat, is more likely to follow riparian areas and other areas with sufficient cover. Such a connection currently exists in the far western tip of the site, where sage scrub-covered hills slope down toward riparian habitat associated with the river, as well as in the eastern hills, which slope down to the river's floodplain. The Project would maintain this connection to offsite areas along an approximately 1,000-foot distance in the westernmost tip of the site which would be placed in biological open space, allowing for continued wildlife access from the Project site to the river. Further, the Project would conserve a continuous connection of land between the eastern hills and the eastern riparian corridor, consisting of an uninterrupted gradient of upland to wetland habitat along approximately 3,000-foot distance. Movement of avian species that forage in the pastures is not anticipated to be impacted by the Project, which would avoid the majority of existing pastures and maintain the equestrian uses that currently exist in the avoided pastures.

Mitigation Measures

As considered by the GPU EIR, Project impacts to wildlife movement and corridors would be mitigated through ordinance compliance and through implementation of mitigation measures Bio 1.6, Bio 1.7, and Bio-2.3.

Consistent with GPU EIR mitigation measure Bio-1.6, the Project would comply with the RPO and would obtain a Habitat Loss Permit (HLP). The Project would also comply with the County Noise Ordinance and other ordinances identified in Bio-1.7. The Project's

impacts to wildlife movement and corridors would be less than significant. Therefore, no new mitigation measures are recommended.

As previously discussed, the GPU EIR determined impacts to wildlife movement corridors as significant and unavoidable. The Project impacts were also determined to be potentially significant. However, the proposed Project would incorporate the GPU EIR mitigation measures Bio-1.6, Bio-1.7 and Bio-2.3 for a less than significant impact with mitigation. Therefore, the Project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 4(e) The GPU EIR concluded this impact to be less than significant. With regards to local policies and ordinances, the Project would impact wetlands and sensitive habitat lands outlined in the RPO. The Project would impact sensitive habitat lands consisting of 32.5 acres of occupied gnatcatcher habitat in the western portion of the site (i.e., Diegan coastal sage scrub). The Project also would result in unavoidable impacts to 0.19 acre of RPO wetlands to construct a necessary road crossing. The crossing is allowed by the RPO because the required conditions are met, as analyzed in detail the Biological Resources Technical Report dated August 7, 2019 there is no feasible alternative that avoids the wetland; the crossings are limited to the minimum number feasible; and the crossings are located and designed in such a way as to cause the least impact to environmental resources, minimize impacts to sensitive species and prevent barriers to wildlife movement; the least-damaging construction methods are utilized; and there would be no net loss of wetlands and impacts to wetlands would be mitigated at a minimum ratio of 3:1. Therefore, the Project would comply with the RPO.

The Project site lies within the boundaries of the Draft Multiple Species Conservation Program (MSCP) North County Plan boundaries. The MSCP North County Plan identifies a draft Pre-Approved Mitigation Area (PAMA). Much of the Project site (1,176.9 of 1,402.5 acres, or 84 percent) occurs within areas identified as PAMA within the Lower San Luis Rey River Linkage, as identified in the draft plan.

While the Project would impact a total of 257.6 acres of land identified as PAMA (256.5 acres on site and 1.1 acres off site), 186.9 acres of impacts within PAMA are to non-sensitive vegetation communities, representing nearly three quarters (73 percent) of the Project impacts within PAMA. Most of the land supporting sensitive vegetation communities within on-site portions of the linkage would be conserved by the Project and placed in biological open space. The proposed Project supports the conservation goals and objectives for the Lower San Luis Rey River Linkage by minimizing impacts to sage scrub; providing for conservation of potential foraging and aestivation habitat for arroyo toad and western spadefoot; maintaining and restoring riparian habitat near the San Luis Rey River; incorporating long-term management of biological open space, and maintaining connectivity for wildlife movement between the Project site, San Luis Rey River, and hills offsite to the east near I-15.

The Project has been designed to assist in implementing the proposed PAMA and to contribute to long-term habitat value for plants and wildlife within the draft MSCP North County Plan boundaries. The configuration of proposed biological open space results in conservation of a large block of preserved land that contributes substantially to the viability of the Preserve by providing large areas of live-in habitat and dispersal habitat for key species of concern (e.g., coastal California gnatcatcher). The Project would not preclude or prevent the successful preparation and implementation of the NC MSCP Plan.

The Project would mitigate coastal sage scrub habitat loss in accordance with Section 4.3 of the NCCP Guidelines. The Project would impact a combined total of 33.9 acres of Diegan coastal sage scrub and flat-topped buckwheat scrub on and offsite. Extensive coordination has taken place with County and Wildlife Agency staff regarding the Project footprint and proposed conservation, resulting in a Project design that minimizes habitat loss to the maximum extent feasible. Therefore, no significant impact would occur.

Mitigation Measures

As considered by the GPU EIR, future Projects proposed under the GPU would be required to comply with applicable HCPs and NCCPs. Regulatory processes to ensure compliance are already in place. Therefore, a potentially significant impact associated with conflicts with HCPs and NCCPs would not occur. No mitigation measures were identified in the GPU EIR.

The Project's impact would be less than significant; therefore, no specific mitigation measures are identified.

As previously discussed, the GPU EIR determined impacts on local policies and ordinances as well as habitat conservation plans and natural community conservation plans as less than significant. As the proposed Project would have a less-than-significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

Conclusion

With regards to the issue area of Biological Resources, the following findings can be made:

1. No peculiar impacts to the Project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. Feasible mitigation measures contained within the GPU EIR (Bio-1.6, Bio-1.7, Bio-2.2, Bio-2.3, and Bio-2.4) would be applied to the Project. Those mitigation measures, detailed above, requires the Project applicant to provide for on- and off-site biological open space and preservation, as well as preserve wetlands, comply with ordinances and storm water management, and obtain permits through the wildlife agencies.

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

Discussion

Based on an analysis of records and a survey of the property, it has been determined that there are no impacts to historical resources because those resources identified as significant would be preserved. The results of the evaluation are provided in the study titled, *Cultural Resources Study for the Ocean Breeze Ranch Project*” (May 9, 2019).

5(a) The GPU EIR concluded this impact to be less than significant with mitigation. Six resources (CA-SDI-20174, CA-SDI-21876, P-37-028134, P-37-028139, P-37-031762, and P-37-035850) were evaluated. Further information on these resources can be found within the technical study and the analysis is summarized below.

Significant Resources

P-37-031762

P-37-031762 is comprised of 2 historic cisterns with large tamarisk trees growing from them. No historic artifacts or additional features were identified. The age of the cisterns is unknown. This site is assumed to be CEQA and RPO significant in the absence of testing. This resource is outside of the Project impact boundary, or Area of Potential Effect (APE).

P-37-035850

P-37-035850 includes five of the six historic residences within the boundaries of the Project site and was recorded as the Dulin Ranch. They were constructed between 1913 and 1953 and include (1) the one-and-a-half story, Prairie-Style Canfield Estate Ranch House, (2) the two-story, Monterey Revival-Style residence (Guest House), (3) single-story bungalow (Office), and (4 and 5) and two smaller, single-story, Pre-Railroad-Style bunkhouses (Mess Hall and Maid’s Quarters). Research conducted as part of the current study concluded that this historic complex is more closely associated with Charles A. Canfield, and Louis and Hope Lighton. As such, the complex is referred to as the Canfield-Lighton Ranch Complex.

These resources were evaluated for significance under CEQA, the RPO, and the Secretary of Interior Standards (as discussed above). The five structures of the Canfield-Lighton Ranch Complex meets Criterion 2 (*is associated with the lives of persons important in our past*), Criterion 3 (*embodies the distinctive characteristics of a type, period, region, or method of construction; represents the work of an important creative individual; or possesses high artistic values*), and Criterion 4 (*has yielded, or may be likely to yield, information important in prehistory or history*) of CEQA. These resources did not meet the criteria for significance under the RPO because they (1) are not formally determined eligible or listed in the National Register, (2) are not zoned with the Historic ("H") Special Area Designator, (3) are not one-of-a-kind, locally unique, or regionally unique cultural resources that contain a significant volume and range of data and materials, and (4) are not a location of past or current sacred religious or ceremonial observances. These resources are CEQA significant. See the cultural study for details related to the architecture and integrity evaluation for each structure.

Mitigation Measures

As considered by the GPU EIR, Project impacts to historical resources would be mitigated through ordinance compliance and through implementation of mitigation measures Cul-1.1, Cul-1.2, and Cul-1.3. Specific mitigation measure CULT-1 detailed in the Cultural Resources Report is consistent with mitigation in the GPU EIR and is summarized below.

This mitigation measure includes the placement of a Use, Maintenance and Repair Easement to be placed over the five significant structures as a condition of the Project.

This easement is for the protection of the historic Canfield-Lighton Ranch (5 structures) and prohibits demolition or alteration of the building. The sole exception to this prohibition is the repair, restoration, or rehabilitation of the house in accordance with the "Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings or the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings (Weeks and Grimmer 1995)". Any plan for such activities shall be designed by a qualified historical architect and approved by the Director of PDS and implemented by a building contractor with demonstrated experience in the renovation and rehabilitation of historic buildings.

As previously discussed, the GPU EIR determined impacts on historic resources to be less than significant with mitigation. The proposed Project determined impacts on historic resources to be potentially significant. However, the proposed Project would incorporate GPU EIR mitigation measures Cul-1.1, Cul-1.2 and Cul-1.3 (as well as Project specific mitigation measures consistent with the GPU EIR) for a less than significant impact with mitigation. Therefore, the Project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 5(b) The GPU EIR concluded this impact to be less than significant with mitigation. Based on an analysis of records and a survey of the property, it has been determined impacts to archaeological resources would be less than significant with implementation of mitigation measures. Six resources (CA-SDI-776 Loci A through I, CA-SDI-1083, CA-SDI-8237, CA-SDI-12550, CA-SDI-21874, and CA-SDI-21875) were evaluated.

The County conducted tribal outreach for the purposes of AB-52 consultation on January 11, 2017. Five tribes (Pala, Pechanga, Rincon, San Luis Rey, and Soboba) were

contacted. Of the five tribes, four (Pala, Pechanga, Rincon, and San Luis Rey) requested consultation. Two field visits were conducted on June 9, 2017 and July 28, 2017. The field visits were attended by Pala, Rincon and San Luis Rey. The field visits specifically focused on the existing road and design for the widening of the road. It was agreed that capping of the resource prior to roadway improvements would provide appropriate protections. The tribes requested that during construction that additional measures be required that include a contribution toward an ethno-history of the Morro Hill area, dust control measures, treatment agreement and preservation plan, and a pre-grade survey.

Since the scoping of the Project, it was determined that a Negative Declaration, Mitigated Negative Declaration, or EIR is not required. As such, AB-52 consultation does not apply to the Project. However, Tribal consultation was conducted to identify areas of concern for the Native American community. The Tribes identified sensitive areas within the Project site and worked with staff to determine appropriate measures. Several “not significant” and “limited significant” resources were identified and are detailed within the Cultural Resources Report. Significant resources are detailed below.

Significant Resources

CA-SDI-776, Locus A and Locus B include a surface expression of artifacts, bedrock milling features and an intact subsurface deposit. These resources possess additional research potential and were determined to be CEQA and RPO significant.

CA-SDI-8237 is a rock art panel that is located outside of the APE. This resource was determined to be CEQA significant because it has the potential to yield information important to history or prehistory. It is also RPO significant because all rock art locations exhibit unique individual traits related to the person or persons responsible for the illustration, which are assumed to have religious or ceremonial implications. This site would be avoided by its placement in open space.

CA-SDI-21874 contains milling features. This site was not tested due to its location within open space. In the absence of testing, this site is assumed CEQA and RPO significant.

Mitigation Measures

As considered by the GPU EIR, Project impacts to cultural resources would be mitigated through ordinance compliance and through implementation of GPU mitigation measures Cul-1.1, Cul-1.2, and Cul-1.3. Specific mitigation measures CULT-2 through CULT-6 are fully detailed in the Cultural Resources Report, are consistent with mitigation in the GPU EIR, and include the following: an Archaeological Monitoring Program, Temporary Fencing, Pre-Grade Survey, Capping Plan, Open Space Dedication, and Dust Control Plan would be required as conditions of the Project.

Conditions of Approval

In addition to the mitigation measures listed above, conditions of approval were agreed to during tribal consultation and include Contribution towards an Ethno-Historic Study of the Morro Hill area and a Treatment Agreement and Preservation Plan.

As previously discussed, the GPU EIR determined impacts to archaeological resources as less than significant with mitigation. The Project determined impacts to archaeological resources as potentially significant. However, the Project would incorporate the GPU EIR mitigation measures Cul-1.1, Cul-1.2 and Cul-1.3 (as well as

Project specific mitigation measures and conditions consistent with the GPU EIR) for a less than significant impact with mitigation. Therefore, the Project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 5(c) The GPU EIR concluded this impact to be less than significant. The site does not contain any unique geologic features that have been listed in the County's Guidelines for Determining Significance for Unique Geology Resources nor does the site support any known geologic characteristics that have the potential to support unique geologic features.

As previously discussed, the GPU EIR determined impacts on unique geologic features as less than significant. As the Project would have a less-than-significant impacts for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 5(d) The GPU EIR concluded this impact to be less than significant with mitigation. A review of the County's Paleontological Resources Maps and data on San Diego County's geologic formations indicates that the Project is located on geological formations of Quaternary Alluvium that have a low potential to contain unique paleontological resources. Proposed grading would include more than 2,500 cubic yards of excavation which has the potential to impact fossil deposits.

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

As previously discussed, the GPU EIR determined impacts on paleontological resources as less than significant with mitigation. The proposed Project determined impacts to paleontological resources as potentially significant. However, the proposed Project would incorporate the GPU EIR mitigation measures Cul-3.1 for a less than significant impact with mitigation. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 5(e) The GPU EIR concluded this impact to be less than significant with mitigation. Based on an analysis of records and archaeological surveys of the property, it has been determined that the Project site does not include a formal cemetery or any archaeological resources that might contain interred human remains. Also see section 5(b) above for mitigation measures for inadvertent discoveries.

As previously discussed, the GPU EIR determined impacts to human remains as less than significant with mitigation. The proposed Project determined impacts to human remains as potentially significant. However, the proposed Project would incorporate the GPU EIR mitigation measures Cul-1.1, Cul-1.2 and Cul-1.3 (as well as Project specific mitigation measures consistent with the GPU EIR) for a less than significant impact with mitigation. Therefore, the Project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

Conclusion

With regards to the issue area of cultural/paleontological resources, the following findings can be made:

1. No peculiar impacts to the Project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. Feasible mitigation measures contained within the GPU EIR (Cul-1.1 through Cul-1.3 and Cul-3.1), would be applied to the Project. Those mitigation measures, detailed above, requires the Project applicant to preserve resources in perpetuity, comply with ordinances, the Mills Act, would restrict demolition/removal of resources and require paleontological monitoring during grading.

Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
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6. Energy Use – Would the Project:

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

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

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

Energy use was not specifically analyzed within the GPU EIR as a separate issue area under CEQA. At the time, Energy Use was contained within Appendix F of the CEQA Guidelines and since then has been moved to the issue areas within Appendix G of the CEQA Guidelines. However, the issue of energy use in general was discussed within the GPU and the GPU EIR. For example, within the Conservation and Open Space Element of the GPU, Goal COS-15 promotes sustainable architecture and building techniques that reduce emissions of criteria pollutants and GHGs, while protecting public health and contributing to a more sustainable environment. Policies, COS-15.1, COS-15.2, and COS-15.3 would support this goal by encouraging design and construction of new buildings and upgrades of existing buildings to maximize energy efficiency and reduce GHG. Goal COS-17 promotes sustainable solid waste management. Policies COS-17.1 and COS-17.5 would support this goal by reducing GHG emissions through waste reduction techniques and methane recapture. The analysis below specifically analyzes the energy use of the Project.

6(a) The proposed Project would increase the demand for electricity and natural gas at the Project site, and gasoline consumption in the Project area during construction and operation relative to existing conditions. The proposed Project includes two components, a planned residential development (PRD) and a private equestrian facility. The PRD would include the construction of 396 residential lots, HOA open space, parks,

roads and landscaped areas. The equestrian facility consists primarily of previously constructed buildings and structures, however additional improvements are also proposed. Improvements would include bringing the equestrian facility up to building and fire code standards as well as obtaining permits for proposed horse shade structures, a horse aquatic therapy pool, relocating employee manufactured homes and an equipment maintenance shop.

CEQA requires mitigation measures to reduce “wasteful, inefficient and unnecessary” energy usages (Public Resources Code Section 21100, subdivision [b][3]). Neither the law nor the State CEQA Guidelines establish criteria that define wasteful, inefficient, or unnecessary use. Compliance with the California Code of Regulations 2019 Title 24 Part 6 Building Code would result in highly energy-efficient buildings. However, compliance with building codes does not adequately address all potential energy impacts during construction and operation. It can be expected that energy consumption, outside of the building code regulations, would occur through the transport of construction materials to and from the site during the construction phase, the use of personal vehicles by residents, and the operation of delivery vehicles to service the new residential units.

Grading and Construction

During the grading and construction phases of the Project, the primary energy source utilized would be petroleum from construction equipment and vehicle trips. To a lesser extent, electricity would also be consumed for the temporary electric power for as-necessary lighting and electronic equipment. Activities including electricity would be temporary and negligible; therefore, electricity use during grading and construction would not result in wasteful, inefficient, or unnecessary consumption of energy. In addition, natural gas is not anticipated to be required during construction of the proposed Project. Any minor amounts of natural gas that may be consumed as a result of the Project construction would be temporary and negligible and would not have an adverse effect; therefore, natural gas used during grading and construction would also not result in wasteful, inefficient, or unnecessary consumption of energy.

The grading required for the Project would be approximately 1.9 million cubic yards of even cut and fill. This would rely on petroleum consumption throughout the grading as well as the construction phases of the proposed Project. Fuel consumed by construction equipment would be the primary energy resource expended over the course of grading and construction. Vehicle trips associated with the transportation of construction materials and construction workers commutes would also result in petroleum consumption, but to a lesser extent. The Project would require heavy-duty construction equipment with Tier 3 or better engines to be used during each phase of construction and would commence beginning year 2022 with construction ending in year 2029. Petroleum consumptions would be necessary for operation and maintenance of construction equipment and would not be beyond what is necessary for construction of the Project. The application of Tier 3 or better engines for all construction equipment would improve the efficiency of the equipment beyond what would be assumed for a standard fleet.

The energy needs for the Project construction would be temporary and is not anticipated to require additional capacity or increase peak or base period demands for electricity or other forms of energy. Construction equipment use and associated energy consumptions would be typical of that associated with the construction of residential projects of this size in a rural setting. The Project is consistent with the General Plan and Zoning Ordinance. The General Plan allows for the construction of 402 residential

units by-right. The Project of 396 residential units would be comparable, if not less, energy intensive than the construction required for the General Plan buildout. Further, the Project is a conservation subdivision, locating density within a smaller footprint and preserving on-site resources. Approximately fifty-nine percent (59%) of the 1402-acre site would be placed within a permanent biological open space easement and would not be developed. Accordingly, the General Plan buildout scenario would likely have higher construction emission since the building footprint would cover a larger land area.

The proposed Project is consistent with the General plan and is anticipated to consume less energy during construction activities than what would have been assumed for buildout of the site under the General Plan. Due to the aforementioned factors, the Projects energy consumption during the grading and construction phase would not be considered wasteful, inefficient, or unnecessary.

Operational

Operation of the Project would be typical of residential land uses requiring natural gas for space and water heating, and landscape maintenance activities. Indirect energy use would include wastewater treatment and solid waste removal at offsite facilities. The Project would provide numerous sustainability features that would reduce transportation and building energy consumption and increase the efficient use of water. A summary of these features is provided in the Projects Greenhouse Gas Analysis, prepared by Ldn Associates and dated July 2019. The Project would meet the California Code of Regulations Title 24 Standards for energy efficiency that are in effect at the time of construction. As the standards are updated on a triennial basis, building energy efficiency would continue to improve throughout the Project's buildout.

The Project would generate approximately 3,990 average daily trips (ADT), as described in the Project Traffic Study prepared by LSA and dated September 2019. The existing equestrian facility is considered part of baseline conditions and is not reflected in the ADT estimates. Improvements to the equestrian facility are proposed as part of the permit process including bringing the facility up to fire and building code requirements, proposing horse shade structures, a horse aquatic therapy pool and relocating employee manufactured homes; these improvements are not associated with an increase in Project-related ADT.

The Project is consistent with the General Plan which allows for 402 residential units on the Project site. As discussed in the Project Traffic Study (Appendix X), the General Plan buildout (GP buildout) scenario would generate approximately 4,212 ADT. Pursuant to the above information, the Project would result in roughly equivalent or less operational petroleum usage than what has been anticipated within the General Plan. The Project would plumb and install an electric vehicle charging station in each of the 396 residential units, further reducing the anticipated petroleum consumption from Project-related activities. Therefore, the Project would not be expected to result in wasteful, inefficient or unnecessary petroleum usage throughout Project operations.

Over the lifetime of the proposed Project, fuel efficiency of vehicles is expected to increase as older vehicles are replaced with newer, more efficient models. As such, the amount of petroleum consumed as a result of vehicle trips to and from the Project site during operation would decrease over time. State and Federal regulations regarding standards for vehicles (e.g. Advanced Clean Cars Program, CAFÉ Standards) are designed to reduce wasteful, unnecessary, and inefficient use of fuel. The coupling of various State policies and regulations such as the Zero-Emission Vehicles Mandate and

Senate Bill 350 would result in the deployment of electric vehicles which would be powered by an increasingly renewable electrical grid. These actions, along with the Project's installation of EV charging in each residential unit, would reduce energy use compared to other similar Projects consistent with the General Plan.

The proposed Project would use electricity for street lighting and for appliances and lighting within both the equestrian facility and residential buildings. As previously discussed, the equestrian facility is considered baseline condition, and improvements included to these facilities as part of the Project would be minimal and not result in an increase in electricity usage. The residential component of the Project would be required to meet Title 24 of the California Building Code, which establishes energy efficiency standards for buildings to reduce energy demand and consumption. The Project would install high-efficiency Light Emitting Diode (LED) street and area lighting to achieve reduction in overall lighting and energy. Additionally, the Project would install at least 6,577 300-watt solar photovoltaics on-site to reduce the Project's reliance on off-site generated electricity. The Project is consistent with the General Plan and would not be expected to result in wasteful, inefficient or unnecessary electric energy usage throughout Project operations.

The proposed Project would use natural gas for building heating, water heating and appliances. The equestrian facility is considered part of baseline conditions, however minor improvements are proposed that would result in minimal increases in natural gas consumption. Water heating associated with a new horse aquatic therapy pool is proposed for the equestrian facility. This would not result in a significant increase in natural gas consumption as the therapy pool would only be used intermittently on an as-needed bases for horse rehabilitation.

The proposed residential use result in natural gas energy use for building heating, water heating and appliances. The proposed Project would be designed according to the latest version of Title 24, which would continue to improve building efficiency and result in less natural gas consumption over time. The proposed Project would not result in natural gas consumption atypical of residential uses and would be consistent with the anticipated natural gas consumption under General Plan building of the site; therefore the Project would not be expected to result in wasteful, inefficient or unnecessary natural gas energy usage throughout Project operations.

As previously discussed, the GPU EIR did not analyze Energy as a separate issue area under CEQA. Energy was analyzed under the GPU and GPU EIR and has been incorporated within General Plan Elements. The Project would not conflict with policies within the GPU related to energy use, nor would it result in the wasteful, inefficient, or unnecessary consumption of energy resources, as specified within Appendix G of the CEQA Guidelines.

6b. Many of the regulations regarding energy efficiency are focused on increasing the energy efficiency of buildings and renewable energy generation, as well as reducing water consumption and reliance on fossil fuels. The proposed Project includes the following energy conservation measures:

- Tier 3 or better construction equipment which would reduce fuel consumption associated with construction activities;
- High-efficiency Light Emitting Diode (LED) street and area lighting which would reduce electricity consumption on-site;

- Compliance with County's Water Conservation in Landscaping Ordinance, demonstrating a 40% reduction in outdoor use which would reduce energy required for water conveyance;
- Install low flow indoor water fixtures in all residential units, reducing water consumption in associated energy required for water conveyance;
- Plumb and install a single Level 2 electric vehicle (EV) charging station in each of the 396 residential units, which would reduce petroleum consumption from Project-generated traffic; and
- Install 1,973 KW of PV (equivalent to 6,577 300-watt panels or an average of 16.6 panels per home), which would reduce the Project's reliance on electricity generated off-site.

The County's Climate Action Plan is a long-term plan that identifies strategies and measures to meet the County's targets to reduce GHG emissions by 2020 and 2030, consistent with the State's legislative GHG reduction targets, and demonstrates progress towards the State's 2050 GHG reduction goal (County of San Diego, 2017). Implementation of the CAP requires that new development Projects incorporate more sustainable design standards and implement applicable reduction measures consistent with the CAP. To help streamline this review and determine consistency of proposed Projects with the CAP during development review, the County has prepared a CAP Consistency Review Checklist (Checklist). The Project would implement all applicable measures identified in the Checklist and would therefore be consistent with the County's Climate Action Plan. In addition, the Project would be consistent with several energy reduction policies of the County General Plan including policies COS-14.1, COS-14.3 and COS-16.3. Additionally, the Project would be consistent with sustainable development and energy reduction policies such as policies COS-14.3 and COS-15.4, through compliance with the most recent Title 24 standards at the time of Project construction. Therefore, the proposed Project would implement energy reduction design features and comply with the most recent energy building standards consistent with applicable plans and policies. Therefore, the proposed Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

As previously discussed, the GPU EIR did not analyze Energy as a separate issue area under CEQA. Energy was analyzed under the GPU and GPU EIR and has been incorporated within General Plan Elements. The Project would not conflict with policies within the GPU related to energy use or conflict with or obstruct a state or local plan for renewable energy or energy efficiency as specified within Appendix G of the CEQA Guidelines.

Conclusion

With regards to the issue area of Energy, the following findings can be made:

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

7. Geology and Soils – Would the Project:

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

Discussion

A Geotechnical Feasibility Evaluation and Addendum (Evaluation) has been prepared by GeoSoils, Inc., dated August 22, 2019.

7(a)(i) The GPU EIR concluded this impact to be less than significant. The Project is not located in a fault rupture hazard zone identified by the Alquist-Priolo Earthquake Fault Zoning Act, Special Publication 42, Revised 1997, Fault-Rupture Hazards Zones in California. However, the site is situated in an area of active faulting. The Temecula segment of the Elsinore fault is the closest known active fault to the site approximately 11.1 miles from the Project site. The Julian segment of the Elsinore fault located approximately 11.7 miles from the Project site would have the greatest effect on the site in the form of strong ground shaking, if an earthquake were to occur. However, the possibility of ground shaking at the site is no different than from the southern California region as a whole. In addition, no local active faulting was noted nor observed to specifically transect the site during field investigation. A review of available regional geologic maps confirmed the field investigation results that no presence of local active faults cross the specific Project site. For a response related to ground shaking, please refer to 7(a)(ii) below.

7(a)(ii) The GPU EIR concluded this impact to be less than significant. To ensure the structural integrity of all buildings and structures, the Project must conform to the Seismic Requirements as outlined within the California Building Code. In addition, a soils compaction report with proposed foundation recommendation would be required to be approved before the issuance of a building permit. Therefore, compliance with the California Building Code and the County Building Code would ensure that the Project would not result in a significant impact.

7(a)(iii)The GPU EIR concluded this impact to be less than significant. Adverse geologic structures that would preclude Project feasibility were not encountered on-site. However, the potentially liquefiable and compressible deposits of alluvium would require more investigation in order to develop a program of ground mitigation and/or specialized foundation/infrastructure designs. According to the Evaluation, portions of the Project site are located within a “Potential Liquefaction Area” as identified in the County Guidelines for Determining Significance for Geologic Hazards. Portions of the Project site are underlain with alluvial material. Some alluvial materials are liquefiable and would display some settlement during an earthquake. A liquefaction analysis was performed using the LiquefyPro computer program (Civiltech Software, 2006 [version 5a]), field boring/laboratory data, and by utilizing the data from the recent Cone Penetration Testings (CPTs). The analysis was conducted in general accordance with Special Publication 117A “Guidelines for Evaluating and Mitigating Seismic Hazards in California” (California Department of Conservation, California Geological Survey [CSG], 2008). Please see the Evaluation for the specific data utilized for the computer program liquefaction analysis. The results indicated that liquefaction may occur within areas underlain by younger alluvium occurring below the groundwater table. To ensure no impacts would occur, a soils compaction report would be required prior to ground disturbance activities. In addition, a Geotechnical Monitor would be required during all grading activities. Please see below for Project conditions of approval.

Conditions of Approval

The following list includes the Project conditions of approval:

Geological Soils Report

- A California Certified Engineering Geologist shall complete a final soils report specific to the preliminary design of the proposed development and submit the final soils report to PDS. The findings shall be reviewed and approved by the Director of the County Department of Planning and Development Services or designee.

Geotechnical Monitoring

- A geotechnical consultant in the field shall perform geotechnical observation and/or laboratory testing during grading to identify areas of potential liquefaction and develop conclusions and recommendations. All alluvial soils in areas of proposed development or future fill shall be removed and recompacted during grading.

7(a)(iv)The GPU EIR concluded this impact to be less than significant. The site is not located within a “Landslide Susceptibility Area” as identified in the County Guidelines for Determining Significance for Geologic Hazards. Further, the Evaluation indicated no presence of landslide deposits, slumps, or other significant forms of mass wasting. No adverse geologic structures that would preclude Project feasibility were encountered on the site.

As previously discussed, the GPU EIR determined less than significant impacts from exposure to seismic-related hazards and soil stability. As the proposed Project would have a less-than-significant impact with the incorporation of Project conditions for a geological soils report and geotechnical monitoring, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

7(b) The GPU EIR concluded this impact to be less than significant. According to the Soil Survey of San Diego County, the soils on-site are identified as alfisols, entisols, inceptisols, and mollisols that has a soil erodibility rating of moderate and severe.

However, the Project would not result in substantial soil erosion or the loss of topsoil because the Project would be required to comply with the Watershed Protection Ordinance (WPO) and Grading Ordinance which would ensure that the Project would not result in any unprotected erodible soils, would not alter existing drainage patterns, and would not develop steep slopes. Additionally, the Project would be required to implement Best Management Practices (BMPs) per the Priority Development Project Storm Water Quality Management Plan to prevent fugitive sediment. Please see section ten (10) Hydrology and Water Quality for a detailed discussion.

As previously discussed, the GPU EIR determined impacts from soil erosion and topsoil loss to be less than significant. As the Project would have a less-than-significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 7(c) The GPU EIR concluded this impact to be less than significant. As indicated in response (a)(iv), the site is not located within a "Landslide Susceptibility Area" as identified in the County Guidelines for Determining Significance for Geologic Hazards. With regards to lateral spreading, it is a principal effect from liquefaction. Pursuant to the Evaluation, any planned fill slopes constructed within existing alluvial areas present a potential for lateral spreading to affect the perimeter fill slopes underlain with unmitigated alluvial soils below the groundwater table. Therefore, the Project would be required to conduct a soils analysis report to ensure no impacts would occur. For more on lateral spreading, see response (a)(iii). The Evaluation also concluded the potential for significant areal subsidence to be low. Collapse may be caused by unstable geological structures or conditions. Graded slopes are generally considered to be stable, up to gradients of 2:1 or flatter, and bedrock slopes may be suitable to gradients of 1.5:1, or flatter. Mapping of the site indicated some potential for dip slope-oriented fractures/joins in bedrock that may require stabilizing, and slope gradients of 2:1, or flatter. In order to ensure no impacts would occur from unstable geologic formations, stabilization measures would be required by a geotechnical consultant in the field during grading activities. Moreover, the Evaluation concluded that the natural slopes appeared to be performing adequately and that no adverse geologic structures that would preclude Project feasibility were encountered on-site. Please see below for the Project conditions of approval.

Conditions of Approval

The following list includes the Project conditions of approval:

Stabilization Measures

- A geotechnical consultant in the field shall perform mapping of temporary slope excavations, including front, side and backcuts, and all cut slopes during grading and blasting. If adverse geologic conditions (e.g., highly fractured and jointed rock, clay-lined fractures, seepage zones) are encountered during installation of cut slopes, stabilization measures shall be required and implemented during grading. Specific stabilization measures shall include, but not be limited to, removal of loose boulders or displaced rocks, stability fill, buttresses, rock-bolting, and/or catchment netting.

As previously discussed, the GPU EIR determined impacts from soil stability to be less than significant. As the proposed Project would have a less-than-significant impact with the incorporation of Project condition for a geological monitor, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 7(d) The Project is underlain with the following soils according to the Evaluation: holocene alluvial sediments generally within the 100-year flood plain; quaternary (Pleistocene) age older alluvium (stream terrace deposits) on lower slopes descending to the valley floor and in areas flatter than 4:1 slope; and granitic bedrock on steeper slopes and upland areas. Representative samples of near surface site soils were tested for expansion potential. Results were disclosed within the Evaluation. The Expansion Index (E.I.) test was performed in general accordance with ASTM Standard D 4829. The laboratory test results indicated that the soil expansion potentials are generally very low (E.I. 0-20), as defined within Table 18-I-B of the Uniform Building Code (1994). In addition, the Project would not result in a significant impact because compliance with the Building Code and implementation of standard engineering techniques would ensure structural safety.

As previously discussed, the GPU EIR determined impacts from expansive soils to be less than significant. As the proposed Project would have a less-than-significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 7(e) The GPU EIR concluded this impact to be less than significant. The majority of the Project site would rely on public water and sewer for the disposal of wastewater. However, PA-3 and the Hillside Estate Parcel would rely on either conventional leach lines or supplemental treatment systems to the satisfaction of the Department of Environmental Health (DEH). As such, the Project would not place septic tanks or alternative wastewater disposal systems on soils incapable of adequately supporting the tanks or system.

As previously discussed, the GPU EIR determined impacts to wastewater disposal systems to be less than significant. As the proposed Project would have a less-than-significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

Conclusion

With regards to the issue area of Geology and Soils, the following findings can be made:

1. No peculiar impacts to the Project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. No mitigation measures contained within the GPU EIR would be required because Project specific impacts would be less than significant by adhering to the Project conditions of approval, which are consistent with the GPU EIR.

8. Greenhouse Gas Emissions – Would the Project:

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Background on CAP and Litigation

The County of San Diego adopted a Climate Action Plan on February 14, 2018 which outlines actions that the County will undertake to meet its greenhouse gas (GHG) emissions reductions targets. Implementation of the CAP requires, among other things, that new development Projects incorporate more sustainable design standards and implement applicable reduction measures consistent with the CAP. In March 2018, petitioners filed a lawsuit against the County challenging the CAP and its EIR.

In December 2018, the San Diego Superior Court ordered the approval of the CAP and its EIR to be set aside, and enjoining reliance on the County CAP’s mitigation measure M-GHG-1. In January 2019, the County appealed the San Diego Superior Court ruling, which stays the Superior Court ruling during the appeal. While the CAP is technically valid until the Fourth District Court of Appeals issues its decision, the analysis prepared for the Project did not rely on the CAP to streamline the Project’s environmental analysis under CEQA Guidelines Section 15183.5. The analysis below shows the Project’s compliance with the CAP, but it also analyzes GHG impacts using a separate and independent analysis. The GHG emissions from the proposed Project and buildout of the General Plan. As such, in the event that the CAP does not withstand judicial scrutiny, the Project has undergone a separate, stand-alone analysis for determining whether the Project’s GHG emissions would significantly impact the environment.

Discussion

A Global Climate Change Analysis (Analysis) was prepared for the Project by Ldn Consulting, Inc. and dated July 23, 2019. The analysis was prepared according to guidelines established within the California Global Warming Solutions Act of 2006 – Assembly Bill 32 (AB 32), Senate Bill 97 (SB97), and the California Environmental Quality Act (CEQA).

Project Design Features:

The proposed Project has incorporated design features to reduce the impacts associated to GHG. The below design features have been incorporated into this analysis:

- Project-related construction activities would use Tier 3 or better construction equipment with DPF United States (U.S.) Environmental Protection Agency (EPA)/ California Air Resources Board (CARB)-certified construction equipment with DPF. The Project developer has confirmed commitment to this feature.
- The Project would utilize architectural coatings compliant with San Diego Air Pollution Control District (SDAPCD) Rule 67 (SDAPCD, 2015).
- Install high-efficiency Light Emitting Diode (LED) street and area lighting to achieve reduction in overall lighting energy.
- The Project would only install Natural Gas fireplaces within all 396 residential units.
- In accordance with the California Integrated Waste Management Act (AB 939), and to be consistent with AB 341’s statewide 75% diversion policy, the Project would seek to also achieve a 75% diversion goal by providing areas for storage and collection of

recyclables and provide literature promoting recycling to achieve additional waste diversion.

- The Project applicant would be required to comply with County's Water Conservation in Landscaping Ordinance and demonstrates a 40% reduction in outdoor use, and would submit a Landscape Document Package to show such compliance. A 20% reduction was assumed within GHG modeling to be conservative
- Install low flow indoor water fixtures in all residential units.
- Plumb and install a single Level 2 electric vehicle (EV) charging station in each of the 396 residential units.
- The Project would install 1,973 KW of PV which is equivalent to 6,577 300-watt panels or an average of 16.6 panels per home.

The following are additional design features which were not incorporated within the analysis:

- Landscaped and screened parking areas consistent with the County's Parking Design Manual, including Section 7 (Landscaping) and the "cool parking" mitigation requirements identified by the CARB.
- Provision of short-term bicycle parking racks at several of the park areas within the Project per County requirements.
- Building efficiency features such as High-Efficiency HVAC system, sealed (tight) air ducts that minimize heating and cooling HVAC losses, tankless water heaters and Low E dual pane windows.
- Work with the regional or local water agency to determine if incentives/rebates are available for the purchase and installation of rain barrels.
- Incorporate into Project Covenants, Conditions & Restrictions (CC&Rs) requirements that the HOA coordinate with SANDAG to provide informational materials on rideshare programs such as iCommute San Diego.
- Provide natural gas and electrical outlets in all private rear yards,
- Increase new tree plantings throughout the neighborhood by planting two trees per dwelling unit which is equivalent to a minimum of 792 trees within the Project Site.
- Install weather-based irrigation systems which include rain sensing timers.

Analysis

8(a) The GPU EIR concluded this impact to be less than significant with mitigation. The Project would produce GHG emissions during construction activities, as well as during the operation of the Project through vehicle trips, use of the residential buildings, and other associated uses. Indirect GHG uses would also be produced from offsite sources such as water conveyance and utilities. From an operational perspective, the Project would be less GHG intensive than the density established under the General Plan. Therefore, the Project would have a less-than-significant impact for that, and other reasons, as detailed below.

The equestrian facility and residential component are consistent with the County of San Diego General Plan and Zoning Ordinance. The Global Climate Change analysis compared the GHG emissions from both the proposed 396-unit residential development and General Plan buildout scenario to construct 402 residential units. The equestrian facility was not included within the analysis because it existed at the time of General Plan adoption in 2011, and is considered part of baseline conditions. Improvements to the facility would be placed within the existing footprint and no expansion of the overall footprint, or increase in intensity of use, is proposed. These improvements include bringing the facility up to building and fire code standards as well as obtaining permits for proposed horse shade structures, a horse aquatic therapy pool, relocating employee

manufactured homes and an equipment maintenance shop. The improvements proposed would be minimal and would not pose a significant impact to GHG that would exceed thresholds.

Grading and Construction

The grading required for the Project would be approximately 1.9 million cubic yards of even cut and fill and would begin in the year 2022 with construction ending in 2029. To quantify the GHG construction emissions that would be emitted by the proposed Project during grading and construction, CalEEMod Version 2016.3.2 was utilized. CalEEMod has been manually updated to reflect all Project design features of the first list at the top of this analysis section 8(a). Using the model, the annual construction emission for the proposed Project would be 603.829 Metric Tons (MT) of carbon dioxide equivalent (CO₂e) per year. A comparison to the General Plan buildout construction emissions was not incorporated within the analysis due to the proposed Project consistency with the General Plan. The report assumes the Project would emit the same construction emissions as the General Plan buildout. However, it was noted in the analysis that the General Plan buildout would likely have higher construction emissions since the area and building footprint would be larger. Impacts to GHG from grading and construction would be less than significant.

Operations

The Project would develop 396 residential units, HOA open space, parks, roads and landscaped areas. Operational GHG emissions from the Project would include sources such as area, energy, mobile, solid waste and water uses. The Project would generate 3,990 Average Daily Trips (ADT) as identified within the Project Traffic Study prepared by LSA and dated September 2019. These sources and Project design features have been calculated within CalEEMod. Further detailed post-process calculations were conducted in the Analysis based on additional Project design features that could not be incorporated within CalEEMod. These include electric vehicle charging stations and solar photovoltaics installation at each of the 396 residential units. Based on the aforementioned, the Project would generate approximately 4,914.35 MT of CO₂e annually. Under existing General Plan Density and Zoning, the density for the site would allow for the construction of 402 residential units which would consist of 96 estate lots and 302 smaller single-family lots.

For the purposes of a comparison analysis, the General Plan buildout has been analyzed using the same buildout year as the Project and was also assumed to include Project design features which would have been required based on state and local regulations. By Using CalEEMod Version 2016.3.2, the GHG emissions for the General Plan buildout would generate 6,484.67 MT CO₂e per year. The primary purpose of this comparison is to demonstrate that the Project operations would have been assumed by the General Plan. Thus, the Project would generate 1,570.32 MT CO₂e fewer GHG emission annually than would be produced under a general plan buildout use. In addition, it should be noted that the General Plan buildout scenario analyzed would likely have higher construction emissions since the area and building footprint would be larger. Given this, the Project's GHG emissions are assumed to have been anticipated by the CAP and would therefore result in a less than significant cumulatively considerable increase in GHG emissions.

As previously discussed, the GPU EIR determined impacts to be less than significant with mitigation. As the Project would have a less-than-significant impact for the reasons

detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

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

As previously discussed, the GPU EIR determined impacts to applicable regulation compliance to be less than significant. As the proposed Project would have a less-than-significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

Conclusion

With regards to the issue area of Global Climate Change, the following findings can be made:

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

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
9. Hazards and Hazardous Materials – Would the Project:			
a) Create a significant hazard to the public or the environment through the routine transport, storage, use, or disposal of hazardous materials or wastes or through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, or is otherwise known to have been subject to a release of hazardous substances and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
g) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
h) Propose a use, or place residents adjacent to an existing or reasonably foreseeable use that would substantially increase current or future resident's exposure to vectors, including mosquitoes, rats or flies, which are capable of transmitting significant public health diseases or nuisances?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion

- 9(a) The GPU EIR concluded this impact to be less than significant. The Project would not create a significant hazard to the public or the environment because it does not propose the storage, use, transport, emission, or disposal of Hazardous Substances, nor are Hazardous Substances proposed or currently in use in the immediate vicinity.

The nine onsite wells are to be destroyed (removed) and/or capped. A Well Destruction Permit is required, and the wells are to be destroyed by a licensed well driller. In addition, the existing on-site septic system that serves the existing single-family residence would be abandoned under the Department of Environmental Health (DEH) guidelines. Furthermore, one existing structure is identified for removal. Both a lead survey and asbestos survey is required, and the remediation of lead and asbestos is required prior to the removal of the structure.

The Project is required to comply with the conditions of approval and applicable regulations to ensure that impacts related to the disposal of hazardous materials from the removal of structures (wells, septic system, existing residence) is less than significant.

As previously discussed, the GPU EIR determined impacts from transport, use and disposal of hazardous materials and accidental release of hazardous materials to be less than significant. As the proposed Project would have a less-than-significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 9(b) The GPU EIR concluded this impact to be less than significant. The Project is located within one-quarter mile of an existing or proposed school (Sullivan Middle School and Bonsall High School). These schools are located adjacent to the property at the southeast corner of the site on West Lilac Road. A "Remainder Parcel", "HOA Lot", and "Hillside Estate Parcel" surround the school site. Although the schools are in close proximity to the Project site; the Project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of the schools.

The Project is required to comply with applicable regulations pertaining to hazardous waste to ensure that impacts related to hazardous emissions and schools is less than significant.

As previously discussed, the GPU EIR determined impacts from hazards to schools to be less than significant. As the proposed Project would have a less-than-significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 9(c) The GPU EIR concluded this impact to be less than significant. Based on a site visit and a comprehensive review of regulatory databases, the Project site has not been subject to a release of hazardous substances. Additionally, the Project does not propose structures for human occupancy or significant linear excavation within 1,000 feet of an open, abandoned, or closed landfill, is not located on or within 250 feet of the boundary

of a parcel identified as containing burn ash (from the historic burning of trash), and is not on or within 1,000 feet of a Formerly Used Defense Site.

As previously discussed, the GPU EIR determined impacts from existing hazardous materials sites to be less than significant. As the proposed Project would have a less-than-significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 9(d) The GPU EIR concluded this impact to be less than significant with mitigation. The proposed Project is located within Airport Influence Area two (2) of the Camp Pendleton Land Use Compatibility Plan and is consistent with the Plan. The Project is not located within an Airport Safety Zone, within an Avigation Easement, an Overflight area or within a Federal Aviation Administration Height Notification Surface area. In addition, the Project does not propose construction of any structure equal to or greater than 150 feet in height, constituting a safety hazard to aircraft and/or operations from an airport or heliport.

As previously discussed, the GPU EIR determined impacts on public airports to be less than significant. As the proposed Project would have a less-than-significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 9(e) The GPU EIR concluded this impact to be less than significant with mitigation. The proposed Project is not within one mile of a private airstrip. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 9(f)(i) OPERATIONAL AREA EMERGENCY PLAN AND MULTI-JURISDICTIONAL HAZARD MITIGATION PLAN:

The GPU EIR concluded this impact to be less than significant with mitigation. The Project would not interfere with this plan because it would not prohibit subsequent plans from being established or prevent the goals and objectives of existing plans from being carried out.

- 9(f)(ii) SAN DIEGO COUNTY NUCLEAR POWER STATION EMERGENCY RESPONSE PLAN: The property is not within the San Onofre emergency planning zone.

- 9(f)(iii) OIL SPILL CONTINGENCY ELEMENT:

The Project is not located along the coastal zone.

- 9(f)(iv) EMERGENCY WATER CONTINGENCIES ANNEX AND ENERGY SHORTAGE RESPONSE PLAN:

The Project would not alter major water or energy supply infrastructure which could interfere with the plan.

- 9f)(v) DAM EVACUATION PLAN:

A portion of the proposed Project is located within a dam inundation zone. However, the development would not constitute a "Unique Institution" such as a hospital, school, or retirement home pursuant to the Office of Emergency Services included within the County Guidelines for Determining Significance, Emergency Response Plans. In addition, pursuant to the County Water Authority Approval Letter dated August 2019, the

Project has been deemed acceptable. Therefore, the proposed Project would not impair implementation of or physically interfere with an adopted dam evacuation plan.

As previously discussed, the GPU EIR determined impacts from emergency response and evacuation plans to be less than significant with mitigation. As the Project would have a less-than-significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 9(g) The GPU EIR concluded this impact as significant and unavoidable. The proposed Project is adjacent to wildlands that have the potential to support wildland fires. However, the Project would not expose people or structures to a significant risk of loss, injury or death involving wildland fires because the Project would comply with the regulations relating to emergency access, water supply, and defensible space specified in the Consolidated Fire Code, as described in the approved Fire Protection Plans prepared for the Project by Firewise 2000, Inc., both dated May 2019. According to the Fire Protection Plans and Fire Service Availability Letter submitted for the Project, the equestrian facility and all residential components (PA-1, -2, -3, and Hillside Estate Lot) would meet the required travel response times per the County of San Diego General Plan Safety Element.

As previously discussed, the GPU EIR determined impacts from wildland fires to be significant and unavoidable. However, the proposed Project would have a less-than-significant impact with no required mitigation for the reasons detailed above. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 9(h) The GPU EIR concluded this impact as less than significant. The Project includes an existing equestrian facility that provides the training, breeding, rehabilitation, and boarding of horses. The equestrian facility is part of the requested entitlements. The Project would be conditioned to comply with both a Vector Control Plan, September 2019, and Manure Management Plan, September 2019, that was submitted to the County and conceptually approved by the DEH.

The Vector Control Plan is required to establish procedures in order to manage the existence of vectors due to various sources for the breeding of vectors. The equestrian facility includes a pond located north of the Stallion Barn and south of Pastures 7 & 8. The pond requires management to prevent a sudden or substantial increase in the population of mosquitoes or other undesirable insects. The Vector Control Plan requires that water in the pond be freshened by small, regular additions of fresh water, and by recirculating the pond's water through pumps and discharged back into the pond, in order to promote water movement, disturb the water's surface and prevent stagnation. In addition, the Project would manage the possible formation of standing water bodies by eliminating the features and prevent their return at a subsequent point in time. In addition, the Vector Control Plan also requires education of equestrian facility employees, manure management, trash management, hay storage management, pest control, and monitoring and reporting.

The Manure Management Plan is required to establish procedures in order to manage horse manure waste. The equestrian facility includes 7 barns, 1 equipment/hay storage barn, 1 workshop, 3 groundwater well pump houses, 8 employee houses, 1 future therapy pool, 1 water pond, 23 fenced pastures, 22 roofed pens, 13 unroofed pens, 2

open-air arenas, 1 circular exerciser, 9 existing pasture shade structures, and 16 proposed pasture shade structures. The Manure Management Plan requires waste management that includes the removal of waste from pens, stalls and any area where horses are concentrated, in order to minimize negative effects associated with the undesired accumulation of excess waste. In addition, the Manure Management Plan also requires education of equestrian facility employees, waste management, storage, and disposal practices; central waste collection; waste management methods; and monitoring reporting and enforcement.

As previously discussed, the GPU EIR determined less than significant impacts with mitigation from vectors. However, the proposed Project would have a less-than-significant impact from vectors with the incorporation of Project conditions of a Vector Control Plan and a Manure Management Plan. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

Conclusion

With regards to the issue area of Hazards and Hazardous Materials, the following findings can be made:

1. No peculiar impacts to the Project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. No mitigation measures contained within the GPU EIR would be required because Project specific impacts would be less than significant by adhering to the Project conditions of approval, which are consistent with the GPU EIR.

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
10. Hydrology and Water Quality – Would the Project:			
a) Violate any waste discharge requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Is the project tributary to an already impaired water body, as listed on the Clean Water Act Section 303(d) list? If so, could the project result in an increase in any pollutant for which the water body is already impaired?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Could the proposed project cause or contribute to an exceedance of applicable surface or groundwater receiving water quality objectives or degradation of beneficial uses?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?

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

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

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

h) Provide substantial additional sources of polluted runoff?

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

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

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

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

m) Inundation by seiche, tsunami, or mudflow?

Discussion

Three technical studies were prepared for the project related to hydrology and water quality:

- (1) A Priority Development Project (PDP) Storm Water Quality Management Plan (SWQMP) dated July 31, 2019, prepared by Project Design Consultants
- (2) A Drainage Study dated July 31 2019 and prepared by Project Design Consultants,
- (3) A Hydraulic Analysis dated May 22, 2019 and prepared by Chang Consultants

- 10(a) The GPU EIR concluded this impact to be significant and unavoidable. Development Projects have the potential to generate pollutants during both the construction and operational phases. For the Project to avoid potential violations of any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality, storm water management plans are prepared for both phases of the development Project.

During the construction phase, the Project would prepare and implement a Storm Water Pollution Prevention Plan (SWPPP). The SWPPP would implement the following typical erosion control BMPs: hydraulic stabilization and hydroseeding on disturbed slopes; County Standard lot perimeter protection detail and County Standard desilting basin for erosion control on disturbed flat areas; energy dissipater outlet protection for water velocity control; silt fencing, fiber rolls, gravel and sand bags, storm drain inlet protection and engineered desilting basin for sediment control; stabilized construction entrance, street sweeping and vacuuming for offsite tracking of sediment; and measures to control materials management and waste management.

The SWPPP would be prepared in accordance with Order No. 2009-009-DWQ, National Pollutant Discharge Elimination System (NPDES) Order CAS000002 Construction General Permit (CGP) adopted by the State Water Resources Control Board (SWRCB) on September 2, 2009. During the post-construction phase, as outlined in the SWQMP, the Project would implement site design, source control and structural BMPs to prevent potential pollutants from entering storm water runoff. The SWQMP has been prepared in accordance with the County of San Diego BMP Design Manual (2019) and SDRWQCB Order No. R9-2013-0001 Municipal Separate Storm Sewer System (MS4) permit (2013), as adopted by the RWQCB on May 8, 2013.

Conditions of Approval

The following list includes the Project conditions of approval:

Storm Water Pollution Prevention Plan

- A SWPPP would be prepared in accordance with the National Pollutant Discharge Elimination Systems Construction General Permit adopted by the State Water Resources Control Board.

The Project's conformance to the waste discharge requirements of both the CGP and MS4 storm water permits listed above ensures the Project would not create cumulatively considerable water quality impacts and addresses human health and water quality concerns. Therefore, the Project would not contribute to a cumulatively considerable impact to water quality from waste discharges.

As previously discussed, the GPU EIR determined significant and unavoidable impacts to water quality standards and requirements. However, the proposed Project would have a less-than-significant impact to water quality standards with the implementation of Project conditions as detailed above. The conditions are consistent with the GPU EIR mitigation measures Hyd-1.2 through Hyd-1.5. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 10(b) The GPU EIR concluded this impact to be significant and unavoidable. The Project lies in the Bonsall (903.12) hydrologic subarea, within the San Luis Rey hydrologic unit. According to the Clean Water Act Section 303(d) list, a portion of this watershed are

impaired. Constituents of concern in the San Luis Rey watershed include chloride and total dissolved solids. The Project could contribute to release of these pollutants; however, the Project would comply with the WPO (identified as mitigation measure Hyd-1.2) and implement site design measures, source control BMPs, and treatment control BMPs to prevent a significant increase of pollutants to receiving waters.

As previously discussed, the GPU EIR determined significant and unavoidable impacts to water quality standards and requirements. However, Project would have a less-than-significant impact with mitigation (Hyd-1.2 through Hyd-1.5) to water quality standards and requirements. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

10(c) The GPU EIR concluded this impact to be significant and unavoidable. As stated in responses 9(a) and 9(b) above, implementation of BMPs and compliance with required ordinances would ensure that Project impacts are less than significant. As previously discussed, the GPU EIR determined significant and unavoidable impacts to water quality standards and requirements and groundwater supplies and recharge. However, the proposed Project would have a less-than significant impact with mitigation to water quality standards and requirements and groundwater supplies and recharge (Hyd-1.2 through Hyd-1.5). Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

10(d) The GPU EIR concluded this impact to be significant and unavoidable. The Project would obtain its water supply from the Ramona Municipal Water District that obtains water from surface reservoirs or other imported sources. The Project would however continue to use groundwater. Five on-site wells in the equestrian facility would remain in operation. No new groundwater wells would be drilled. Historically, groundwater usage on the site has been for irrigation of horse pastures as well as agricultural row crops and avocado orchards and would be considered part of baseline conditions. The historic irrigation onsite totals 576.7 acres. With the proposed Project, approximately 110.1 acres would require continued groundwater irrigation. Overall, with the proposed Project, a reduction of groundwater usage of 81% is expected.

As previously discussed, the GPU EIR determined significant and unavoidable impacts to groundwater supplies and recharge. However, the proposed Project would have a less-than-significant impact to groundwater recharge with mitigation (Hyd-1.2 through Hyd-1.5). Therefore, the Project would not be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

10(e) The GPU EIR concluded this impact to be less than significant with mitigation. The Project would not result in substantial erosion or siltation on or off-site because storm water management plans are prepared for both the construction and post-construction phases of the development Project. During the construction phase, the Project would prepare and implement a SWPPP. The SWPPP would implement the following typical erosion control BMPs: hydraulic stabilization hydroseeding on disturbed slopes; County Standard lot perimeter protection detail and County Standard desilting basin for erosion control on disturbed flat areas; energy dissipater outlet protection for water velocity control; silt fencing, fiber rolls, gravel and sand bags, storm drain inlet protection and engineered desilting basin for sediment control; stabilized construction entrance, street sweeping and vacuuming for offsite tracking of sediment; and measures to control materials management and waste management.

The SWPPP would be prepared in accordance with Order No. 2009-009-DWQ, NPDES Order CAS000002 CGP adopted by the SWRCB on September 2, 2009. During the post-construction phase, as outlined in the Priority Development Project (PDP) Storm Water Quality Management Plan (SWQMP) dated July 31, 2019, prepared by Project Design Consultants, the Project would implement site design, source control and structural BMPs to prevent potential pollutants from entering storm water runoff. The SWQMP has been prepared in accordance with the County of San Diego BMP Design Manual (2019) and SDRWQCB Order No. R9-2013-0001 Municipal Separate Storm Sewer System (MS4) permit (2013), as adopted by the RWQCB on May 8, 2013.

The SWPPP and SWQMP specify and describe the implementation process of all BMPs that would address equipment operation and materials management, prevent the erosion process from occurring, and prevent sedimentation in any onsite and downstream receiving waters. The Department of Public Works would ensure that these Plans are implemented as proposed. Therefore, it has been determined that the Project would not result in significantly increased erosion or sedimentation potential and would not alter any drainage patterns of the site or area on- or off-site.

As previously discussed, the GPU EIR determined significant and unavoidable impacts to erosion or siltation. However, the proposed Project would have a less-than-significant impact to erosion or siltation with mitigation (Hyd-1.2 through Hyd-1.5). Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 10(f) The GPU EIR concluded this impact to be less than significant with mitigation. The Drainage Study determined that the Project would not alter the existing drainage pattern in a manner which would result in flooding on- or off-site. The Project proposes minor changes to the topography. Improvement consists of the grading of pads, public and private streets gutters, curb inlets, and catch basins which would tie into an underground storm drain system. The basins were sized to attenuate post-Project peak flow rates in the event of a 100-year storm event. The improvements also include a bypass system which would prevent the commingling of on-site runoff and run-on from undeveloped areas. Flow from both onsite and offsite drainage areas are conveyed to outfalls along either the San Luis Rey River or the roadside drainage ditches to the south of the property. In addition, the Project's drainage patterns would mimic the existing conditions of the site.

According to the Hydraulic Analysis, two portions of the proposed Project would encroach into the San Luis Rey floodplain. However, the analysis concluded that no grading would encroach within the revised floodway and the proposed residential pads have been designed to be several feet higher than the adjacent 100-year water surface elevations, consistent with GPU EIR Mitigation Measure Hyd-6.1. Therefore, impacts would be less than significant. For more information on the San Luis Rey floodplain and Project conditions, please refer to response 10(i) below.

As previously discussed, the GPU EIR determined impacts to flooding as less than significant with mitigation. The proposed Project would have a less-than-significant impact to flooding with the incorporation of EIR Mitigation Measure Hyd-6.1. This condition requires compliance with the Resource Protection Ordinance to prohibit development in a floodway. Therefore, the Project would be consistent with the analysis within the GPU EIR because it would not increase impact identified within the GPU EIR.

- 10(g) The GPU EIR concluded this impact to be less than significant with mitigation. Pursuant to the Drainage Study prepared by Project Design Consultants and dated July 31, 2019, the proposed Project would detain stormwater onsite and would not increase peak flows; therefore, the Project would not contribute runoff water that would exceed the capacity of existing or planned storm water drainage systems.

As previously discussed, the GPU EIR determined impacts to exceed capacity of stormwater systems as less than significant with mitigation. With mitigation, the proposed Project would have a less-than-significant impact with regards to exceeding the capacity of stormwater systems with mitigation (Hyd-1.2 through Hyd-1.5). Therefore, the Project would not be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 10(h) The GPU EIR concluded this impact to be significant and unavoidable. The Project has the potential to generate pollutants; however, site design measures, source control BMPs, and treatment control BMPs as indicated in response 10(a) would be employed such that potential pollutants would be reduced to the maximum extent practicable. In addition, septic layout designs have been reviewed and incorporated GPU EIR Mitigation Measure Hyd-1.9 as a Project design feature.

As previously discussed, the GPU EIR determine impacts to water quality standards and requirements as significant and unavoidable. However, the proposed Project would have a less-than-significant impact to water quality standards with the implementation of GPU EIR mitigation measures Hyd-1.2 through Hyd-1.5 and Hyd-1.9. Therefore, the Project would not be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 10(i) The GPU EIR concluded this impact to be less than significant with mitigation. According to the Hydraulic Analysis prepared by Chang Consultants and dated May 22, 2019, two portions of the proposed Project would encroach into the San Luis Rey floodplain. The first portion is within PA-3 at the northwestern corner of the site and second portion is along a segment of Dulin Road that would be extended westerly, approximately 1.9 miles to the site. The Hydraulic Analysis includes a floodway analysis to ensure no impacts would occur. The analysis concluded that no grading would encroach within the revised floodway and the proposed residential pads have been designed to be several feet higher than the adjacent 100-year water surface elevations. The Project's grading would meet the County and FEMA hydraulic regulations. In addition, a Conditional Letter of Map Revision (CLOMR) and a Letter of Map Revision (LOMR) pursuant to the Federal Emergency Management Agency (FEMA) would be required for the Project. Therefore, no substantial impacts would occur. For a list of Project conditions, please see below.

Project Conditions

The following are the conditions for the Project:

- The applicant shall submit a CLOMR and LOMR pursuant to FEMA.

As previously discussed, the GPU EIR determined impacts from housing within a 100-year flood hazard area as less than significant with mitigation. The Project would incorporate Project conditions consistent with the GPU EIR mitigation measures Hyd-1.2 through Hyd-1.5. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 10(j) The GPU EIR concluded this impact to be less than significant with mitigation. According to the Hydraulic Analysis, the portions that would encroach within the floodplain would be well above the San Luis Rey 100-year floodplain elevation. Therefore, the Project structures would not impede or redirect flood flows. For more information on the San Luis Rey floodplain and Project conditions, please refer to response 10(i) above.

As previously discussed, the GPU EIR determined impacts from impeding or redirecting flood flows as less than significant with mitigation. The proposed Project would have a less-than-significant impact for the reasons detailed above and is consistent with GPU EIR mitigation measure Hyd-6.1. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 10(k) The GPU EIR concluded this impact to be less than significant with mitigation. As discussed in response 10(i), no grading would encroach within the revised floodway and the proposed residential pads have been designed to be several feet higher than the adjacent 100-year water surface elevations. In addition, the Project's grading would meet the County and FEMA hydraulic regulations. Therefore, no impacts would occur as a result of flooding from the 100-year flood.

As previously discussed, the GPU EIR determined impacts from housing within a 100-year flood hazard area and emergency response and evacuation plans as less than significant with mitigation. The proposed Project would have a less-than-significant impact for the reasons detailed above and is consistent with GPU EIR mitigation measure Hyd-6.1. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 10(l) The GPU EIR concluded this impact to be less than significant with mitigation. The County Office of Emergency Services maintains Dam Evacuation Plans for each dam operational area. These plans contain information concerning the physical situation, affected jurisdictions, evacuation routes, unique institutions and event responses. If a "unique institution" is proposed, such as a hospital, school, or retirement home, within dam inundation area, an amendment to the Dam Evacuation Plan would be required.

A portion of the proposed Project is located within a dam inundation zone. However, the development would not constitute a "Unique Institution" such as a hospital, school, or retirement home pursuant to the Office of Emergency Services included within the County Guidelines for Determining Significance, Emergency Response Plans. The Project would not interfere with the adopted Dam Evacuation Plan. Thus, no significant impacts would occur.

As previously discussed, the GPU EIR determined impacts from dam inundation and flood hazards and emergency response and evacuation plans as less than significant with mitigation. The proposed Project would have a less-than-significant impact for the reasons detailed above and is consistent with GPU EIR mitigation measures Hyd-6.1 and Hyd-8.2. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 10(m)(i) The GPU EIR concluded this impact to be less than significant with mitigation.
SEICHE: The Project site is not located along the shoreline of a lake or reservoir.

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

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

As previously discussed, the GPU EIR determined impacts from seiche, tsunami and mudflow hazards to be less than significant with mitigation. However, the proposed Project would have a less-than-significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

Conclusion

With regards to the issue area of Hydrology and Water Quality, the following findings can be made:

1. No peculiar impacts to the project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. Feasible mitigation measures contained within the GPU EIR (Hyd-1.2 through Hyd-1.5, Hyd-1.9, Hyd-6.1 and Hyd-8.2) would be applied to the Project. The mitigation measures, as detailed above, requires the Project applicant to comply with the guidelines for determining significance for Hydrology and Water Quality as well as for Dam Inundation, the Watershed Protection Ordinance, Stormwater Standards Manual, and the Resource Protection Ordinance.

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

Discussion

11(a) The GPU EIR concluded this impact to be less than significant with mitigation. The Project would propose the introduction of new infrastructure including public roads, water and wastewater pipeline extensions, and utilities to the area. The Project is consistent with the allowed density of 402 units per the County of San Diego General Plan. The Project would develop 396 residential units; therefore, buildout of the site was anticipated in the GPU. As previously discussed, the GPU EIR determined impacts from physically dividing an established community as less than significant with mitigation. However, the proposed Project would have a less-than-significant impact for the reasons detailed above and has incorporated GPU EIR Mitigation Measures Lan-1.1 through

Lan-1.3 in the Project design. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 11(b) The GPU EIR concluded this impact to be less than significant. The Project would permit an existing equestrian facility and subdivide a 1,402.5-acre property into 396 lots as a Conservation Subdivision, which is consistent with the development density established by the General Plan and the certified GPU EIR. County Subdivision Ordinance Section 81.401(r) calls for residential Projects with lands designated as SR-10, and RL-20 through RL-80 to be designed as conservation subdivision. The Project has been designed as a conservation subdivision but consolidating the Project's development footprint in a way which minimizes impacts to environmental resources per Sec. 81.401(r)(1), with avoided areas set aside from development by conservation easements per Sec. 81.401(r)(1). The discretionary actions for the Project include a tentative map, and two Major Use Permits, one for the equestrian facility and one for the Planned Residential Development (PRD) of PA-1 and PA-2.

The Project site is Zoned Limited Agriculture (A-70), Open Space (S-80), and Variable Family Residential (RV) and has General Plan land use designations of VR-4.3, SR-4, SR-10, RL-20 and RL-40. As stated in response 11(a), the Project would be consistent with the General Plan allowed density and has been anticipated in the GPU EIR. In addition, the site falls within two planning areas: majority of the Project site falls within the Bonsall Community Plan Area, with a portion requiring compliance with the Bonsall Design Guidelines, while only the northeastern tip of the site falls within the Fallbrook Community Plan Area. The Project would be consistent with the Bonsall Community Plan and Bonsall Design Guidelines, as well as the Fallbrook Community Plan. A Site Plan with architectural drawings has been developed for the PRD pursuant to Zoning Ordinance Section 5750. The Site Plan has been designed closely with the Bonsall Design Guidelines and would require approval from the Bonsall Community Planning Group prior to approval of the Project. Therefore, the Project would not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the Project adopted for the purposes of avoiding or mitigating an environmental effect. As previously discussed, the GPU EIR determined impacts to conflicts with land use plans, policies, regulations as less than significant. As the Project would have a less-than significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

Conclusion

With regards to the issue area of Land Use and Planning, the following findings can be made:

1. No peculiar impacts to the Project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. Feasible mitigation measures contained within the GPU EIR (Lan-1.1 through Lan-1.3) have been applied to the Project requiring coordination efforts to ensure that development of the site would not divide an established community.

Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
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12. Mineral Resources – Would the Project:

- | | | | |
|---|--------------------------|--------------------------|--------------------------|
| a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

12(a) The GPU EIR determined that impacts to mineral resources would be significant and unavoidable. It considered several mitigation measures related to the siting of residential Projects on sites that contain known mineral resources, but ultimately determined them to be infeasible. For example, it considered the prohibition of incompatible uses that would be located on or near significant mineral resource sites. But that measure would result in restrictions on future development in areas identified or increased growth in the General Plan Update because significant or potentially significant mineral resources sites have been identified throughout the western portion of the unincorporated County, where the majority of development under the General Plan Update would take place. Thus, that measure would conflict with goal of the Housing Element to provide sufficient housing stock and would not achieve one of the primary objectives of the proposed Project which is to accommodate a reasonable amount of growth.

The GPU EIR also considered, for projects that propose incompatible uses near significant mineral resource sites, to require the applicants to mine the site prior to project development. However, the GPU EIR determined that measure would result in undue hardship on the entitlement process as extraction activities often take decades to complete and may make the site unusable for the proposed land use.

GPU EIR mitigation measure Min-1.1 requires projects to assess the impact of new development on mineral resources as required by the County Guidelines for Determining Significance for Mineral Resources, which typically requires a Mineral Resources Investigation. Therefore, a Mineral Resources Investigation (2019) has been prepared by GeoSoils, Inc. for the proposed Project.

The California Surface Mining and Reclamation Act (SMARA) required classification of land into Mineral Resource Zones (MRZs). The northernmost portion of the Project site (north of Dulin Ranch Road) is classified as MRZ-2. MRZ-2 is defined as areas underlain by mineral deposits where geologic data show that significant measured or indicated resources are present. Specifically, the MRZ-2 area is underlain by alluvial deposits of the San Luis Rey River. The remainder of the Project site is located within an area which has been classified by the California Department of Conservation – Division of Mines and Geology as MRZ-3. Areas classified as MRZ-3 contain known mineral deposits that may qualify as mineral resources. Further exploration work within these areas could result in the reclassification into the MRZ-2 category. The approximate delineation of these Mineral Resource Zones is shown in Figure 6 of the Mineral Resources Investigation.

Based on borings, the Mineral Resources Investigation concluded the alluvial deposits could be excavated to depths of up to about 20 feet using heavy-duty grading equipment. The potentially minable area within the Project site consists of approximately 398.54 acres. The total volume of the quarry extracted to an average depth of 20 feet would be approximately 12,859,557 cubic yards. Based on a material waste percentage of 20 percent, the volume of the quarry would be 13,373,940 tons (net).

The alluvial deposits underlying a portion of the Project site may be only marginally suitable as sources of construction materials due to the high waste percentage and the variable weathering of the alluvial constituents. Nonetheless, the loss of this resource within the Project site would be considered significant, pursuant to County guidelines. As mitigation was previously determined to be infeasible by the GPU EIR, there would be no other feasible mitigation for the Project beyond what was already required (complying with the County Guidelines for Determining Significance for Mineral Resources). Therefore, consistent with the GPU EIR, impacts would be significant and unavoidable.

12(b) The GPU EIR concluded this impact to be significant and unavoidable. The Project site is not located in an Extractive Use Zone (S-82), nor does it have an Impact Sensitive Land Use Designation (24) with an Extractive Land Use Overlay (25). Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

Conclusion

With regards to the issue area of Mineral Resources, the following findings can be made:

1. No peculiar impacts to the Project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. As there are no feasible mitigation measures, the Project's impacts to mineral resources would be significant and unavoidable. Since the GPU EIR concluded significant and unavoidable impacts to mineral resources, the Project would not result in an impact which was not adequately evaluated by the GPU EIR.

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

Discussion

13(a) The GPU EIR concluded this impact to be less than significant with mitigation. The area surrounding the Project site consists of parcels that are zoned Rural Residential (RR), Limited Agriculture (A70), Specific Plan (S88), Open Space (S80), and Mobilehome Residential (RMH4). The Project would not expose people to potentially significant noise levels that exceed the allowable limits of the General Plan, Noise Ordinance, or other applicable standards for the following reasons:

General Plan – Noise Element: Policy 4b addresses noise sensitive areas and requires Projects to comply with a Community Noise Equivalent Level (CNEL) of 60 decibels (dBA) or increase of 10 dB (CNEL) over pre-existing noise. Projects which could produce noise in excess of 60 dB(A) are required to incorporate design measures or mitigation as necessary to comply with the Noise Element. Based on a review of the County’s noise contour maps and Acoustical Analysis dated June 21, 2019 by Lnd Consulting, Inc., the Project is not expected to expose any on- and off-site, existing, or planned noise sensitive areas to noise in excess of 60 dB(A) or increase of 10 dB (CNEL) over the pre-existing noise.

Noise Ordinance – Section 36-404: Non-transportation noise generated by the Project is not expected to exceed the standards of the Noise Ordinance at or beyond the Project’s property line. The site is zoned A70, S80, and Variable Family Residential (RV) that has

a one-hour average sound limit of 50 dBA daytime and 45 dBA nighttime. The adjacent properties are zoned RR, A70, S88, S80, and RMH4. The Project does not involve any noise producing equipment that would exceed applicable noise levels at the adjoining property line.

Noise Ordinance – Section 36.408, 36.409, and 36.410: The Project would not generate construction noise in excess of Noise Ordinance standards. Construction operations would occur only during permitted hours of operation. Also, it is not anticipated that the Project would operate construction equipment in excess of an average sound level of 75dB between the hours of 7 AM and 7 PM. Rock drills would be located at a minimum of 200 feet from the nearest occupied residential property line would comply with the Noise Ordinance noise limit of 82 dBA, Section 36.410 (a). However, to be in compliance with the 75 dBA noise limit pursuant to Section 36.409, the rock drill must be at least 225 feet from any occupied NSLU. As conditioned for Project, any work occurring with 225 feet of an adjacent property line would be required to provide further noise analysis and mitigation. Blasting operation would comply with the County's Consolidated Fire Code. For a list of Project conditions, please see below.

Project Conditions

The following are the Project's conditions:

Blasting Noise Plan

- Prior to any ground disturbing activities, the applicant shall submit to, and receive approval from, the Director of PDS, a Blasting Plan consistent with Noise and an Exhibit showing all location of where blasting activities would occur.

Temporary Rock Crushing and Drilling

- Prior to any ground disturbing activities, the applicant shall submit to, and receive approval from, the Director of PDS, an Exhibit showing all locations where rock crushing and drilling would occur. The location of any temporary rock crushing and drilling activities shall be adequately setback.
- During ground disturbing activities, the location of any temporary rock crushing and rock drilling activities shall be adequately setback.

Temporary Construction Noise

- During ground disturbing activities, the Project shall comply with the temporary construction noise control measures and shall comply with the eight-hour average sound level of 75 dBA pursuant to Noise Ordinance Section 36.408 and 36.409.

As previously discussed, the GPU EIR determined impacts from excessive noise levels to be less than significant with mitigation. However, the proposed Project would have a less than significant impact with specific Project conditions. These conditions are consistent with GPU EIR Mitigation Measures Noi-1.1 and Noi-4.2. Therefore, the proposed Project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 13(b) The GPU EIR concluded this impact to be less than significant with mitigation. The Project includes residential uses which are sensitive to low ambient vibration. However, the residences would be setback more than 600 feet from any public road or transit Right-of-Way with projected noise contours of 65 dB or more; any property line for parcels zoned industrial or extractive use; or any permitted extractive uses. A setback of 600 feet ensures that the operations do not have any chance of being impacted by groundborne vibration or groundborne noise levels (Harris, Miller Miller and Hanson Inc., Transit Noise and Vibration Impact Assessment 1995). As previously discussed, the GPU EIR determined impacts from excessive groundborne vibration to be less than

significant with mitigation. However, the Project would have a less-than-significant impact with no required mitigation for the reasons detailed above. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 13(c) As indicated in the response listed under Section 12(a), the Project would not expose existing or planned noise sensitive areas in the vicinity to a substantial permanent increase in noise levels that exceed the allowable limits of any applicable noise standards. Also, the Project is not expected to expose existing or planned noise sensitive areas to noise 10 dB CNEL over existing ambient noise levels. As previously discussed, the GPU EIR determined impacts from permanent increase in ambient noise levels to be significant and unavoidable. However, the Project would have a less-than-significant impact with no required mitigation for the reasons detailed above. Therefore, the Project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.
- 13(d) The GPU EIR concluded this impact to be less than significant with mitigation. The Project does not involve any operational uses that may create substantial temporary or periodic increases in ambient noise levels in the Project vicinity. Also, general construction noise is not expected to exceed the construction noise limits of the Noise Ordinance. Construction operations would occur only during permitted hours of operation. Also, the Project would not operate construction equipment in excess of 75 dB for more than 8 hours during a 24-hour period. As previously discussed, the GPU EIR determined impacts from temporary increase in ambient noise levels to be less than significant with mitigation. However, the proposed Project would have a less than significant impact with specific Project conditions (listed in response 13(a)). Therefore, the Project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.
- 13(e) The GPU EIR concluded this impact to be less than significant with mitigation. The Project is located within an Airport Land Use Compatibility Plan (ALUCP) for airports (Camp Pendleton Air Terminal) and is consistent with the plan. Therefore, the Project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.
- 13(f) The GPU EIR concluded this impact to be less than significant with mitigation. The Project is not located within a one-mile vicinity of a private airstrip. Therefore, the proposed Project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

Conclusion

With regards to the issue area of Noise, the following findings can be made:

1. No peculiar impacts to the Project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. No mitigation measures contained within the GPU EIR would be required because Project specific impacts would be less than significant by adhering to the project conditions of approval, which are consistent with the GPU EIR.

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

Discussion

14(a) The GPU EIR concluded this impact to be less than significant. The Project site is designated in the General Plan as Rural (RL-40, RL-20), Semi-Rural (SR-4, SR-10) and Village Residential (VR-4.3). A total of 402 residential units could be developed under these designations. Development of the Project would include 396 residential units. As such, the Project would not induce substantial unplanned population growth in the area as development of the site was accounted for within the GPU. In addition, the Project does not propose any physical or regulatory change that would remove a restriction to or encourage population growth in the area. As previously discussed, the GPU EIR determined impacts from population growth to be less than significant. As the proposed Project would have a less-than-significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

14(b) The GPU EIR concluded this impact to be less than significant. The Project would not displace substantial numbers of existing housing. Only one structure, the 1980s ranch house would not be retained. The Project would develop 396 residential units. As such, replacement housing would not be required elsewhere.

As previously discussed, the GPU EIR determined impacts from displacement of housing to be less than significant. As the proposed Project would have a less-than-significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

14(c) The GPU EIR concluded this impact to be less than significant. The Project would not displace a substantial number of people. Only one structure, the 1980s ranch house would not be retained. As such, replacement housing would not be required elsewhere.

As previously discussed, the GPU EIR determined impacts from displacement of people to be less than significant. As the proposed Project would have a less-than-significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

Conclusion

With regards to the issue area of Population and Housing, the following findings can be made:

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

Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
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15. Public Services – Would the Project:

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

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

15(a) The GPU EIR concluded this impact to be less than significant with mitigation for the exception of school services, which remained significant and unavoidable. Water and sewer service would be provided by the Rainbow Municipal Water District (RMWD). Within Planning Areas 1 and 2, wastewater would be provided by an onsite public sewer distribution system to be constructed by the Project. Two sewer lift stations would be constructed to transmit wastewater flows to an existing offsite sewer line in West Lilac Road. Within Planning Area 3, septic systems would be installed to handle domestic wastewater flows. Project internal water distribution systems would be constructed by the Project, connecting to existing transmission lines owned by RMWD.

Fire protection and emergency medical response services would be provided by the North County Fire Protection District (NCFPD.) The nearest fire station is NCFPD's Fire Station #5, located at 5906 Olive Hill Road near SR-76. This station was completed in 2015 and has sufficient capacity to serve this Project. In addition, Fire Station #4 located at 4375 Pala Mesa Drive is located 2.1 miles from the east entrance to the Ocean Breeze Ranch Project site.

Electricity, Gas, Telephone and CATV service is currently available in West Lilac Road. Facilities for service would be extended into the Project site by the Project developer and would be constructed underground.

Pursuant to the Project availability forms, students living within this community would attend schools of the Bonsall Unified School District. The elementary school serving this

site would be Bonsall Elementary, at the intersection of Camino del Rey and Old River Road. The middle school would be Sullivan Middle School, which is located on West Lilac Road and is adjacent to the property at the southeast corner of the site. High school students would attend Bonsall High School, which has been constructed at the Sullivan campus on West Lilac Road. The Project applicant would pay for all applicable school fees to the Bonsall Unified School District.

Trash collection services in the area are provided by private providers such as EDCO or Waste Management. Residents would be able to secure weekly trash collection by entering into monthly service agreements with the appropriate provider.

Based on the Project’s service availability forms, and the discussion above, the Project would not result in the need for significantly altered services or facilities. As previously discussed, the GPU EIR determined impact to fire protection services, police protection services and other public services as significant with mitigation while school services remained significant and unavoidable. However, as the Project would have a less-than-significant impact for the reasons stated above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

Conclusion

With regards to the issue area of Public Services, the following findings can be made:

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

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
16. Recreation – Would the Project:			
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion

16(a) The GPU EIR concluded this impact to be less than significant with mitigation. The Project would increase the use of existing parks and other recreational facilities;

however, the Project would dedicate land to public or private parks. Pursuant to the County's Park Land Dedication Ordinance (PLDO), 3.21 acres of usable, active park area would be required for the Project. The PLDO is the mechanism that enables the funding or dedication of local parkland in the County. The Project would provide for 3.7 acres of public and private park area that meets the County's definition of usable park area, far exceeding the requirements of the PLDO. An additional 12.21 acres of park land would also be dedicated.

As previously discussed, the GPU EIR determined impacts related to deterioration of parks and recreational facilities to be less than significant. As the proposed Project would have a less-than-significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 16(b) The GPU EIR concluded this impact to be less than significant with mitigation. As described above in 15(a), the Project would provide recreational facilities for its residents, including trails connecting to the San Luis Rey River as well as the Sullivan Middle School. Impacts from these amenities have been considered as part of the overall environmental analysis contained elsewhere in this document.

As previously discussed, the GPU EIR determined impacts related to construction of new recreational facilities to be less than significant. As the proposed Project would have a less-than-significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

Conclusion

With regards to the issue area of Recreation, the following findings can be made:

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

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

Discussion

A Traffic Impact Study, prepared by LSA and dated September 2019 was prepared for the proposed Project. The Project incorporated design features to accommodate pedestrian circulation on site. The Project would construct sidewalks on all connectors to existing or planned pedestrian facilities on adjacent roadways. The design features were incorporated within the below analysis.

17(a) The GPU EIR concluded this impact to be significant and unavoidable. The County of San Diego Guidelines for Determining Significance for Traffic and Transportation (Guidelines) establish measures of effectiveness for the performance of the circulation system. These Guidelines incorporate standards from the County of San Diego Public Road Standards, Mobility Element, and the Transportation Impact Fee Program.

As discussed in the traffic study, new Project trips would be distributed onto County roads. The Project would result in an additional 3,990 average daily trips (ADT) to roadways in the Project area.

Level of Service (LOS) is a professional industry standard by which the operating conditions of a given roadway segment or intersection is measured. Level of Service is defined on a scale of A to F; where LOS A represents the best operating conditions and LOS F represents the worst operating conditions. LOS A facilities are characterized as having free flowing traffic conditions with no restrictions on maneuvering or operating speeds; traffic volumes are low and travel speeds are high. LOS F facilities are characterized as having forced flow with many stoppages and low operating speeds. The LOS ranges are defined below:

Level of Service Ranges			
Level of Service	Roadway Segments – Average Daily Traffic (ADT) Volume ¹	Signalized Intersections – Delay (Seconds/Vehicle) ²	Unsignalized Intersections – Delay (Seconds/Vehicle) ²
A	Less Than 1,900	Less Than or Equal to 10.0	Less Than or Equal to
B	1,901 to 4,100	10.1 to 20.0	10.1 to 15.0
C	4,101 to 7,100	20.1 to 35.0	15.1 to 25.0
D	7,101 to 10,900	35.1 to 55.0	25.1 to 35.0
E	10,901 to 16,200	55.1 to 80.0	35.1 to 50.0
F	Greater Than 16,200	Greater than 80.0	Greater than 50.0

¹ The volume ranges are based on the County of San Diego Circulation Element of a Light Collector, the average d
vided in Appendix A.
² Highway Capacity Manual (HCM).

The Project is anticipated to generate 3,990 average daily trips (ADT), 320 a.m. peak-hour trips (97 inbound and 223 outbound), and 399 p.m. peak-hour trips (280 inbound and 119 outbound).

All study area roadway and two-lane highway segments are anticipated to continue to operate at acceptable capacity levels. Consistent with the County Guidelines for Determining Significance, the Project would not significantly impact any of the study area roadway and two-lane highway segments. The four SR-76 freeway segments analyzed were anticipated to continue operating at acceptable LOS A with the addition of Project traffic. The freeway segments analyzed for the I-15 were both anticipated to continue to operate at unacceptable LOS F with the addition of Project traffic. However, according to Traffic Study and the SANTEC/ITE thresholds of significance, the Project would not cause the freeway segments to exceed the thresholds. Therefore, the Project would not significantly impact any freeway segments.

Based on the results of this TIS, the Project would cause direct and cumulative Project impacts to the following intersections and road segments:

Direct

- West Lilac Road/Camino Del Rey
- Old Highway 395/West Lilac Road

Cumulative

Intersections

- SR-76/East Vista Way-Old River Road
- SR-76/Olive Hill Road-Camino Del Rey

- SR-76/Old Highway 395
- SR-76/North River Road
- SR-76/Via Montellano
- I-15 SB Ramps/Old Hwy 395
- I-15 NB Ramps/Hwy 395
- Old Hwy 395/Camino Del Rey
- Old Hwy 395/Gopher Canyon
- Camino Del Rey/West Lilac
- West Lilac/Old Hwy 395
- Lilac Road/Old Castle Road

Road Segments

- Camino Del Rey (Old River Road to West Lilac)
- Old Hwy 395 (Circle R Road to Camino del Rey)
- Old Hwy 395 (Circle R Road to Gopher Canyon)

According to the Traffic Study, the Project would not result in a significant impact to the aforementioned intersections or road segments with the implementation of improvements and/or mitigation measures. Please see below for a list of Project improvements and mitigation measures.

Project Conditions

Prior to recordation of the first Final Map (irrespective of the Phase or unit number or ownership of the area covered by that Final Map), pay a fair share contribution toward the improvement of the following intersections. The amount of the fair share contribution shall be based on the Projects ADT, to the satisfaction of the Director of Planning & Development Services ("PDS") and Caltrans.

1. SR-76 / E. Vista Way - Old River Road - 2.9%
2. SR-76 / Olive Hill Road – Camino Del Rey - 3.4%
3. SR-76 / Old Highway 395 - 3.8%
4. SR-76 / North River Road - 3.7%
5. SR-76 / Via Montellano - 3.7%

Project Mitigation

The following are the proposed mitigation measures for the Project:

West Lilac Road/Camino Del Rey

- The applicant would be required to implement a roundabout or other options in accordance with the TIS dated September 2019

Old Highway 395/West Lilac Road

- The applicant would be required to implement a signalized intersection

Lilac Road and Old Castle Road

- The applicant would be required to implement an all-way stop control

In addition, the Project has incorporated design features for pedestrian circulation. The Project would not conflict with policies related to non-motorized travel such as mass transit, pedestrian or bicycle facilities.

Therefore, the proposed Project, in combination with other cumulative Projects would not conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for performance of the circulation system.

As previously discussed, the GPU EIR determined significant and unavoidable impacts to unincorporated County traffic and LOS standards. The proposed Project determined impacts to be potentially significant. However, the Project would have a less-than-significant impact with the incorporation of GPU EIR mitigation measures Tra-1.3, Tra-1.4, Tra-1.7, and Tra-2.1 (as well as Project specific mitigation measures consistent with the GPU EIR) for a less than significant impact with mitigation. Therefore, the Project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

17(b) The GPU EIR concluded this impact to be significant and unavoidable. The designated congestion management agency for the County is the San Diego Association of governments (SANDAG). In October 2009, the San Diego region elected to be exempt from the State CMP and, since this decision, SANDAG has been abiding by 23 CFR 450.320 to ensure the region's continued compliance with the federal congestion management process. Therefore, the project would not conflict with an applicable congestion management program and would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR..

17(c) The GPU EIR concluded this impact to be less than significant with mitigation. The Project is located within an Airport Land Use Compatibility Plan (ALUCP) for airports (Camp Pendleton Air Terminal) and is consistent with the plan. The military was notified of this Project on August 15, 2019. The Project is located within Airport Influence Area 2 and is not located within an Airport Safety Zone, an Avigation Easement, or an Overflight Area; no specific Project requirements are required. Therefore, the Project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

17(d) The GPU EIR concluded this impact to be significant and unavoidable. The proposed Project would not substantially alter traffic patterns, roadway design, place incompatible uses (e.g., farm equipment) on existing roadways, or create curves, slopes or walls which would impede adequate sight distance on a road.

As previously discussed, the GPU EIR determined impacts on rural road safety to be significant and unavoidable. However, the Project would have a less-than-significant impact with no mitigation required for the reasons detailed above. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

17(e) The GPU EIR concluded this impact to be less than significant with mitigation. The North County Fire Protection District and the San Diego County Fire Authority have reviewed the Project and its Fire Protection Plan and have determined that there is adequate emergency fire access. In addition, consistent with GPU EIR mitigation measure Tra-4.2, the Project would implement the Building and Fire codes to ensure emergency access accessibility.

As previously discussed, the GPU EIR determined impacts on emergency access as less than significant with mitigation. As the Project would have a less-than-significant impact for the reasons detailed above and is consistent with GPU EIR Mitigation

Measure Tra-4.2, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 17(f) The GPU EIR concluded this impact to be less than significant with mitigation. The Project would not result in the construction of any road improvements or new road design features that would interfere with the provision of public transit, bicycle or pedestrian facilities. In addition, the Project does not generate sufficient travel demand to increase demand for transit, pedestrian or bicycle facilities.

As previously discussed, the GPU EIR determined impacts on alternative transportation and rural safety as less than significant with mitigation. As the proposed Project would have a less-than-significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

Conclusion

With regards to the issue area of Transportation and Traffic, the following findings can be made

1. No peculiar impacts to the Project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. Feasible mitigation measures contained within the GPU EIR (Tra-1.3, Tra-1.4, Tra-1.7, Tra-2.1 and 4.2) would be applied to the Project. The mitigation measures, as detailed above, would require the Project applicant to comply with the County Public Road Standards, Guidelines for Determining Significance, County TIF Ordinance, coordinate with other jurisdictions to identify appropriate mitigation and implement the Building and Fire Codes to ensure adequate services are in place.

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

Discussion

18(a) The GPU EIR concluded this impact to be less than significant with mitigation. The Project would discharge domestic waste to a community sewer system that is permitted to operate by the Regional Water Quality Control Board (RWQCB). A Project facility availability form has been received from the Rainbow Municipal Water District (RMWD) that indicates that there is adequate capacity to serve the Project.

As previously discussed, the GPU EIR determined impacts on wastewater treatment requirements to be less than significant. As the proposed Project would have a less-than-significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

18(b) The GPU EIR concluded this impact to be less than significant with mitigation. The Project involves new water and wastewater pipeline extensions. However, these extensions would not result in additional adverse physical effects beyond those already identified in other sections of this environmental analysis.

Water and sewer service would be provided by the RMWD. Within Planning Areas 1 and 2, wastewater would be provided by an onsite public sewer distribution system that would be constructed by the Project. Two sewer lift stations would be constructed to transmit wastewater flows to an existing offsite sewer line in West Lilac Road. Within Planning Area 3, septic systems would be installed to handle domestic wastewater flows. The Project internal water distribution systems would be constructed by the Project, connecting to existing transmission lines owned by RMWD.

As previously discussed, the GPU EIR determined impacts on wastewater treatment requirements to be less than significant. As the proposed Project would have a less-than-significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 18(c) The GPU EIR concluded this impact to be less than significant with mitigation. The Project involves new storm water drainage facilities (19 basins and 1 hydromodification vault). However, these extensions would not result in additional adverse physical effects beyond those already identified in other sections of this environmental analysis.

As previously discussed, the GPU EIR determined impacts on sufficient stormwater drainage facilities to be less than significant. As the proposed Project would have a less-than-significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 18(d) The GPU EIR concluded this impact to be significant and unavoidable. A Service Availability Letter from the RMWD has been provided which indicates that there is adequate water to serve the Project.

As previously discussed, the GPU EIR determined impacts to adequate water supplies be significant and unavoidable. However, the proposed Project would have a less-than-significant impact with no required mitigation for the reasons detailed above. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 18(e) The GPU EIR concluded this impact to be less than significant with mitigation. A Service Availability Letter from the RMWD District has been provided, which indicates that there is adequate wastewater capacity to serve the Project.

As previously discussed, the GPU EIR determined impacts to adequate wastewater facilities be less than significant with mitigation. However, the proposed Project would have a less-than-significant impact with no required mitigation for the reasons detailed above. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 18(f) The GPU EIR concluded this impact to be less than significant. All solid waste facilities, including landfills require solid waste facility permits to operate. There are five, permitted active landfills in San Diego County with remaining capacity to adequately serve the Project. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

18(g) The GPU EIR concluded this impact to be less than significant. The Project would deposit all solid waste at a permitted solid waste facility. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

Conclusion

With regards to the issue area of Aesthetics, the following findings can be made:

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

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
19. Wildfire – If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the Project:			
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts in the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Expose people or structures to significant risk, including downslopes or downstream flooding or landslides, as a result of runoff, post-fire instability, or drainage changes?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion

Wildfire was analyzed within the GPU EIR within Section 2.7, Hazards and Hazardous Materials. The guidelines for determining significance stated: the proposed General Plan Update would have a significant impact if it would expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands. In 2019, the issue of Wildfire was separated into its own section within Appendix G of the CEQA Guidelines to incorporate the four issue questions above. The GPU EIR did address these issues within the analysis; however they were not called out as separate issue areas. Within the GPU EIR, the issue of Wildland Fires was determined to be significant and unavoidable.

A Fire Protection Plan (FPP) was prepared for the Project. The analysis below relies on the findings contained within the FPP.

Project Design Features:

The proposed Project has incorporated design features to reduce the impacts associated to Wildfire. The below design features have been incorporated into this analysis:

1. All planning areas have an established 100' fuel modification zone around the outside perimeter. This buffer provides adequate space to implement a Zone 1 and 2 fuel modification area.
2. Water supply would allow fire flows to all mains to meet the required 2500 GPM. Security gates in PA3 would be installed and designed to NCFPD standards to allow safe emergency egress.
3. The Project applicant shall define areas of responsibility for the future HOA as well as private lot owners, particularly in regard to responsibility for the 100-foot BMZ zones illustrated on the Project site plan.
4. The Project shall implement the ignition-resistant construction standards compliant with California Fire Code and Chapter 7A of the California Building Code for all residential structures.

19(a) The Project is composed of an existing equestrian facility, a planned residential development and residential estate lots. Improvements for the equestrian facility include bringing the facility up to fire and building code, and permitting new horse shade structures, a horse aquatic therapy pool, an office and relocated employee manufactured homes. The Project site is located in a moderate and a very high fire hazard severity zone (FHSZ). The location of the Project within a very high FHSZ required the preparation of the FPP for both the PRD and the equestrian facility.

The Project would be serviced by the North County Fire Protection District (NCFPD). The Project site is situated between two NCFPD stations. The primary fire station is NCFPD Station #5 at 5906 Olive Hill Drive in Bonsall and is located two (2.0) miles west of the project site. The second station is NCFPD Fire Station #4 at 4375 Pala Mesa Drive and is located three (3.0) miles north of the project site.

An analysis was prepared within the equestrian FPP for the travel response times from Fire Station #4. The equestrian facility would meet the response time required for the project by the County of San Diego General Plan Safety Element. The response time from Fire Station #4 would be five (5) minutes.

An analysis was prepared within the PRD FPP for the travel response times from both Fire Station #4 and Fire Station #5. Due to the density of PA1 and PA2, travel response times would be required to meet five (5) minutes by the County of San Diego General Plan Safety Element. According to the FPP, PA1 and PA2 would meet the response time required for the Project from Station #5. PA3 and the Hillside Estate Lot would consist of larger lots requiring a travel response time of ten (10) minutes by the County of San Diego General Plan Safety Element. According to the FPP, both PA3 and the Hillside Estate Lot would meet the response time required for the Project. Travel time is estimated at seven (7) minutes for PA3 and eight (8) minutes for the Hillside Estate parcel from Station #4.

In addition, the current per capita call volume for NCFPD is approximately 110 per 1,000 residents. With the estimation of 3.2 occupants per residence, an increased population of 1,267 can be anticipated from the proposed development. The anticipated call volume for the equestrian facility and the PRD would be 139 calls per year or 12 calls per month. NCFPD has indicated capacity for the proposed Project call volume is adequate and is eligible for service by the NCFPD.

In addition, other fire agencies outside of NCFPD could also provide emergency responses including California Department of Forestry and Fire Protection (CAL FIRE) Station 15 (Miller Station) and Station 10 (Red Mountain), and the Deer Springs Fire Protection District Stations 11 and 12. Emergency services are provided via contract by CAL FIRE and the Deer Springs Fire Protection District. Therefore, the Project would not substantially impair an adopted emergency response plan or emergency evacuation plan.

As previously stated, Wildfire was analyzed within the GPU EIR within Section 2.7, Hazards and Hazardous Materials and was determined to be significant and unavoidable. However, the proposed Project would have a less-than-significant impact with no required mitigation for the reasons detailed above. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 19(b) The GPU EIR concluded this impact to be significant and unavoidable. Two FPPs, one for the Planned Residential Development and one for the equestrian facility have been prepared by Firewise 2000, Inc. for the Project. The FPPs have considered the property location, topography, geology, combustible vegetation (fuel types), climatic conditions and fire history as part of the assessment. In addition, the plan addresses water supply, access, structural ignitability and ignition resistive building features, fire protection systems and equipment, impacts to existing emergency services, defensible space, and vegetation management. Based on the above factors and analysis, the plans identify areas for hazardous fuel reduction treatments and recommends, the types and methods of such treatment, as well as measures that the property owners would take to reduce the probability of ignition of structures throughout the development.

Project Site Conditions

The 1,402.52 acre Project site includes a variety of terrain, from relatively flat alluvial plain near the San Luis Rey River along the northern boundary to sloping hillsides near the property's southern boundary along West Lilac Road. Elevations at the northern boundary vary from 175 feet above mean sea level (MSL) at the northwest, to 840 feet above MSL at the northeast. Elevations increase progressively to the south, with ridgelines at or near the southern boundary having elevations ranging from 367 feet above MSL to the southwest and 725 feet above MSL at the southeast. Normal weather conditions on-site consist of an onshore flow from the southwest at five to ten miles per hour (5-10 mph). This weather condition has a slightly higher temperature and higher humidity than the Santa Ana winds. Approximately sixty percent (60%) of the existing vegetation on-site is considered a high fire hazard fuel bed which includes Coastal Sage Scrub and buckwheat. Other vegetation types on the property includes non-native grasslands, fallow orchards, oak and eucalyptus woodland, and willow scrub riparian areas. Additionally, a substantial portion of the property (833.85 acres), comprising over half the property would be preserved as biological open space, which would protect

these lands in perpetuity. Habitat to be protected includes significant acres of Diegan Coastal Sage scrub habitat, Coast live oak woodland, and Southern willow Scrub.

Analysis

To evaluate the on-site conditions, fire behavior modeling has been conducted for the Project through the BehavePlus 5.0.5 Fire Behavior Prediction and Fuel Modeling System by Patricia L. Andrews and Collin D. Bevins. The BehavePlus Fire behavior computer modeling system was developed by USDA-Forest Service research scientists at the Intermountain Forest Fire Laboratory, Missoula, Montana, and is utilized by wildland fire experts nationwide. Fire behavior parameters for the Project were calculated for the hazardous native vegetation/fuels historically located on- and off-site. These calculations were the basis for recommended fuel modifications for the Project site development and for consideration of the wildfire threat to the proposed development. Based on the analysis, a 100 foot fuel modification zone (FMZ) and a Building Management Zone (BMZ) would be required around all development areas. Within PA1 and PA2, the HOA would be responsible for fuel modification in all common areas outside the individual lots and all roadside fuel modification zone maintenance. The BMZ within PA1 and PA2 would be landscaped and irrigated and would be maintained by the HOA. Within PA3, fuel modification would be maintained by the individual homeowners.

In addition, a landscape plan would be required prior to building permit as a condition of the Project and would be reviewed by NCFPD to determine acceptable plantings (plant types, location, etc.) within the high fire hazard areas. Roadside brushing would also be required for the Project. All roadways within the Project that abut an area of native vegetation, shall be brushed back 20 feet from both sides of the edge of the roadway. Fuel modification zones along each side of Road A which passes through the proposed biological open space would be required to be 30 feet. This enhancement would provide for greater safety to the development by ensuring evacuation routes are not compromised and by providing for fire fighter safety. For a list of Project design features and conditions of approval, please see the list above 19(a).

Conditions of Approval

- In order to mitigate for dead end road lengths which would otherwise exceed maximum allowable lengths, the Project shall construct Dulin Road as a private road through PA3, connecting to the existing public segment of Dulin Road at the Project's eastern boundary.

As previously stated, Wildfire was analyzed within the GPU EIR within Section 2.7, Hazards and Hazardous Materials and was determined to be significant and unavoidable. However, the Project would have a less-than-significant impact with the incorporation of Project conditions consistent with GPU EIR Mitigation Measure Haz-4.3 for compliance with the Building and Fire Code. The Project has also incorporated the GPU EIR Mitigation Measure Haz-4.2 for brush management as a Project design feature. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 19(c) The GPU EIR concluded this impact to be significant and unavoidable. The proposed Project would require the installation or maintenance of the following associated infrastructure: private and public roads, fuel breaks, and sewer. All infrastructure associated with the Project has been incorporated within this analysis. Therefore, no additional temporary or ongoing impacts to the environment related to associated

infrastructure would occur that have not been analyzed in other sections of this environmental document. Additionally, please refer to 19(a) for the travel times associated with the road infrastructure 19(b) for all applicable fire hazard conditions and Project design features. As previously discussed, the GPU EIR determined impacts from Wildfire to be significant and unavoidable. However, the Project would have a less-than-significant impact with the incorporation of Project design features and conditions consistent with the GPU EIR Mitigation Measures Haz-4.2 and Haz-4.3. Therefore, the Project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

19(d) The GPU EIR concluded this impact to be significant and unavoidable. The Project would include defensible space, including a 100 foot FMZ and a BMZ would be required around all development areas. Within PA1 and PA2, the HOA would be responsible for fuel modification in all common areas outside the individual lots and all roadside fuel modification zone maintenance. The BMZ within PA1 and PA2 would be landscaped and irrigated and would be maintained by the HOA. Within PA3, fuel modification would be maintained by the individual homeowners. In addition, a landscape plan would be required prior to building permit and would be reviewed by NCFPD to determine acceptable plantings (plant types, location, etc.) within the high fire hazard areas. Roadside brushing would also be required for the Project. All roadways within the Project that abut an area of native vegetation, shall be brushed back 20 feet from both sides of the edge of the roadway. With incorporation of these measures, it is not anticipated that the Project would expose people or structures to significant risk due to post-fire instability. As previously discussed, the GPU EIR determined impacts from Wildfire to be significant and unavoidable. However, the proposed Project would have a less-than-significant impact with the incorporation of Project design features and conditions consistent with the GPU EIR Mitigation Measures Haz-4.2 and Haz-4.3. Therefore, the Project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

Conclusion

The GPU EIR concluded significant and unavoidable impacts associated with wildfire under Section 2.7, Hazards and Hazardous Materials. Based on the Project fire behavior modeling and further analysis provided within the FPPs, with the incorporation of Project design features and conditions of approval, impacts associated with wildfire would be less than significant. In addition, the Project Design Features and Conditions of approval listed above are consistent with the mitigation measures of the GPU EIR. Therefore, the proposed Project would not exacerbate wildfire risks and thereby expose Project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire.

Therefore, with regards to the issue area of Wildfire, the following findings can be made:

1. No peculiar impacts to the Project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. Feasible mitigation measures contained within the GPU EIR (Haz-4.2 and Haz-4.3) would be applied to the Project. These mitigation measures, as detailed above, requires the Project applicant to implement brush management and comply with the building and fire codes.

Appendices

Appendix A – References

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

Appendix A

The following is the list of Project specific technical studies used to support the Project's environmental analysis. All technical studies are available on the website here https://www.sandiegocounty.gov/content/sdc/pds/Current_Projects.html#par_title or hard copies are available at the County of San Diego Zoning Counter, 5510 Overland Avenue, Suite 110, San Diego, 92123:

Bacon, David; Firewise 2000, Inc., (July 2019), Fire Protection Plan – Equestrian Center MUP

Bacon, David; Firewise 2000, Inc., (July 2019), Fire Protection Plan – Ocean Breeze Ranch

Capper, Lisa; Helix Environmental Planning, (August 2019), Visual Impact Analysis

Chang, Wayne; Chang Consultants, (May 2019), Hydraulic Analyses

Chang, Wayne; Chang consultants, (May 2019), Hydromodification Screening

GeoSoils, Inc., (August 2019), Addendum to Limited Phase II Environmental Site Assessment

GeoSoils, Inc., (August 2019), Geotechnical Evaluation Update

GeoSoils, Inc., (March 2019), Mineral Resources Investigation

GeoSoils, Inc., (June 2016), Phase I Environmental Site Assessment

GeoSoils, Inc., (July 29, 2019), Response to OBR Project Issues Checklist (Septic Percolation Feasibility Study and Addendum)

Helios Property Solutions LLC, (September 2019), Manure Management Plan

Helios Property Solutions LLC, (September 2019), Vector Control Plan

Helix Environmental Planning, Inc., (August 2019), Resource Protection Study – Focused Steep Slopes Analysis

Louden, Jeremy; Ldn Consulting, Inc., (July 2019), Air Quality Assessment

Louden, Jeremy; Ldn Consulting, Inc., (July 2019), Final Climate Action Plan Consistency Review Checklist

Louden, Jeremy; Ldn Consulting, Inc., (July 2019), Global Climate Change

Louden, Jeremy; Ldn Consulting, Inc., (June 2019), Noise Assessment

Marcin, Dennis; Helix Environmental Planning, Inc., (August 2019), Agricultural Resources Report

Mukherjee, Ambarish; LSA (September 2019), Traffic Impact Study

Nigro, Stacy; Helix Environmental Planning, Inc., (August 2019), Biological Resources Technical Report

Nigro, Stacy; Helix Environmental Planning, Inc., (August 2019), Conceptual Resource Management Plan – Biological Resources

Nigro, Stacy; Helix Environmental Planning, Inc., (August 2019), Conceptual Upland Restoration Plan

Nigro, Stacy; Helix Environmental Planning, Inc., (August 2019), Conceptual Wetland Restoration Plan

Nigro, Stacy; Helix Environmental Planning, Inc., (August 2019), Pasture Management Plan

Reece, Debby; Project Design Consultants, (July 2019), CEQA Preliminary Hydrology/Onsite Drainage Study

Reece, Debby; Project Design Consultants, (July 2019), CEQA Preliminary Hydromodification Management Study

Reece, Debby; Project Design Consultants, (July 2019), Priority Development Project SWQMP

Smith, Brian; Brian F. Smith and Associates, Inc., (August 2019), Cultural Resources Study

References

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

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

Appendix B

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

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