PREPARED FOR: County of San Diego/GDCI Proctor Valley, L.P.

PREPARD BY: Dexter Wilson Engineering, Inc.

DATE: December 2, 2019

SUBJECT: Sewer Study Update for Otay Ranch Village 14 and Planning

Area 16/19 Proposed Project Amendment

#### **Introduction**

This Memorandum reflects proposed changes to the Otay Ranch Village 14 and Planning Areas 16/19 Project that was approved by the San Diego County Board of Supervisors on June 26, 2019 (Approved Project). The changes to the Approved Project would reconfigure the development footprint to consolidate development in Village 14; add 147 units, for a total of 1,266 residential units; and reduce impacts by approximately 230 acres, to 579 acres (the Proposed Project Amendment). Figure 1 in Attachment A, Regional Location Map, shows the regional location of the Approved Project Area and the Proposed Project Amendment Project Area, in the County of San Diego (County).

An Environmental Impact Report (EIR) was prepared for the Approved Project and was certified by the Board on June 26, 2019. The Final EIR analyzed the potential impacts of the Approved Project. The Final EIR also analyzed potential impacts associated with the EIR Land Exchange Alternative, which was one of the alternatives to the Approved Project. The Final EIR is incorporated herein by reference and the results are summarized in Section 3 and mitigation measures are described in Section 5.

The Final EIR analyzed the Approved Project's potential impacts to sewer service. This Sewer Technical Memorandum was prepared for the Proposed Project Amendment. The purpose of this analysis is to evaluate whether, and to what extent, the potential impacts of the Proposed Project Amendment to sewer differ from those of the Approved Project and the EIR Land Exchange Alternative. This technical memorandum includes the following sections: (1) background, (2) Proposed Project Amendment description, (3) summary of the Approved Project's impacts to sewer service, (4) analysis of the Proposed Project Amendment's impacts to sewer service, (5) mitigation measures, and (6) conclusion.

For additional context, the following terminology is used in this Technical Memorandum.

#### **Terminology**

Approved Project: The project described in Otay Ranch Village 14 and Planning Areas 16/19 Tentative Map 5616, Specific Plan 16-002, and the certified EIR, which the County of San Diego (County) approved on June 26, 2019. The Approved Project permits 1,119 residential units within a Project Area of approximately 1,369 acres. The Development Footprint of the Approved Project is 809 acres.

Conserved Open Space: Conserved Open Space refers to 24.5 acres of land within the Project Area, which, while designated in the Otay Ranch General Development Plan/Otay Subregional Plan (Otay Ranch GDP/SRP) for residential uses within Village 14 and Planning Areas 16/19, will not be developed as part of the Proposed Project Amendment. Instead, the Conserved Open Space will be preserved on site and be (a) added to the Otay Ranch Resource Management Plan (RMP) Preserve (through a future RMP Amendment), (b) managed under a separate RMP, or (c) utilized to mitigate impacts to the City of San Diego Multiple Species Conservation Program Cornerstone Lands. The Conserved Open Space areas are located adjacent to Otay Ranch RMP Preserve and will be conserved by recording a biological open space easement over the land.

Development Footprint: The areas where a given project will cause permanent or temporary ground disturbance. The Development Footprint includes all on-site development, off-site improvements, and impacts resulting from infrastructure and other allowable uses within the Otay Ranch Resource Management Plan (RMP) Preserve.

EIR Land Exchange Alternative: The project alternative identified as the "Land Exchange Alternative" in Chapter 4 of the certified Final EIR. This Land Exchange Alternative contemplated a land exchange with the California Department of Fish and

Wildlife (CDFW) and would develop 1,530 residential units within a Project Area of approximately 2,387.6 acres, with a Development Footprint of 658.3 acres.

Off-Site Improvements: Off-site improvements total approximately 40.1 acres and include Proctor Valley Road, wet and dry utilities, drainage facilities, trails, an off-site sewer pump station in the southern reach of Proctor Valley Road, and off-site sewer facilities to connect to the Salt Creek Interceptor as planned since 1994.

Project Area: The total land area for the Proposed Project Amendment as contemplated in the proposed land exchange between applicant and CDFW.<sup>1</sup> The Project Area consists of approximately 1,283.6 acres currently owned by GDCI Proctor Valley, L.P., the owner/applicant, 219.4 acres currently owned by CDFW, and approximately 40.1 acres of off-site improvements, for a total of 1,543 acres.

Proposed Project Amendment: The Proposed Project Amendment reflects proposed changes to the Approved Project, which would add 147 units for a total of 1,266 residential units and would reduce the Development Footprint by approximately 230 acres, to a total of 579 acres, within a Project Area of 1,543 acres, as shown on Figure 2 in Attachment A and more fully described below in Section 2. The Proposed Project Amendment includes a Revised Tentative Map and Specific Plan Amendment. As contemplated in the Dispute Resolution Agreement, the Proposed Project Amendment assumes and will require a County-initiated amendment to the MSCP County Subarea Plan. Because the amendment to the MSCP County Subarea Plan will be initiated by the County, it is not part of the Proposed Project Amendment.

PV1 and PV3: PV1 and PV3 are areas of the Approved Project located in Village 14 as shown on Figure 3 attached.

Revised Tentative Map: The Revised Tentative Map reflects revisions to the June 26, 2019, Approved Tentative Map #5616 that are necessary to process and implement the land exchange with CDFW and the Proposed Project Amendment in the County.

Specific Plan Amendment: The Specific Plan Amendment reflects revisions to the June 26, 2019, Approved Specific Plan #16-002 that are necessary to process and implement the land exchange with CDFW and the Proposed Project Amendment in the County.

<sup>&</sup>lt;sup>1</sup> As indicated above, the land exchange necessary to implement the Proposed Project Amendment must be approved by the California Wildlife Conservation Board.

#### 1. Background

The Proposed Project Amendment Project Area comprises approximately 1,543 acres of undeveloped land within the Proctor Valley area of the 23,000-acre Otay Ranch master planned community (see Figure 4 in Attachment A, Proposed Project Amendment Project Area). The Proposed Project Amendment reflects proposed changes to the Approved Project, including a proposed land exchange with the California Department of Fish and Wildlife (CDFW).

On June 27, 2019, the owner/applicant of the Approved Project entered into a Dispute Resolution Agreement with CDFW, the U.S. Fish and Wildlife Service, and the County. Pursuant to this agreement, the owner/applicant would seek a land exchange with CDFW through a process overseen by the California Wildlife Conservation Board. The proposed land exchange, if approved by the Wildlife Conservation Board, would require the owner/applicant to (i) transfer 147.3 acres in Village 14 and 192.4 acres in Planning Area 16 to CDFW, and (ii) record a conservation easement over 191.5 acres in Planning Area 16. In exchange, CDFW would transfer 219.4 acres in Village 14 to the owner/applicant. The Proposed Project Amendment would then be implemented upon the lands within the applicant's ownership, including those received via the Wildlife Conservation Board land exchange. Because the Proposed Project Amendment assumes the above-described land exchange, it would result in a different development footprint than the Approved Project's development footprint. Therefore, a Specific Plan Amendment to the approved Village 14 and Planning Areas 16/19 Specific Plan and a Revised Tentative Map are required processes for the Proposed Project Amendment.

While the Proposed Project Amendment and EIR Land Exchange Alternative both contemplate exchanges of land with the CDFW, the Development Footprints and other aspects differ. It is important to note that the Development Footprint of the Proposed Project Amendment was assessed in the certified Final EIR as part of the Approved Project Development Footprint and as part of the EIR Land Exchange Alternative Development Footprint.

Dexter Wilson Engineering, Inc. prepared the following technical reports for the Final EIR which are incorporated herein by reference:

- Final EIR Chapter 3 Appendix 3.1.8-1 Overview of Sewer Service dated February 2018.
- Final EIR Chapter 4 Appendix 4.1-14 Land Exchange Alternative Overview of Sewer Service dated February 2018.

## <u>Section 2. Proposed Project Amendment Description and Summary of Amendment/Revisions</u>

The Proposed Project Amendment proposes 1,266 residential units within a Project Area of 1,543 acres. The Proposed Project Amendment Development Footprint would be approximately 578.6 acres, which would consistent of approximately 513.1 acres within Otay Ranch Village 14, 25.2 acres within Otay Ranch Planning Area 19, and 40.1 acres of off-site improvements (i.e., Proctor Valley Road). Of the 1,266 residential units, 1,253 units would be located in Village 14 (consistent with the Otay Ranch GDP/SRP) and 13 units would be located in Planning Area 19 (consistent with the Otay Ranch GDP/SRP). The Proposed Project Amendment is depicted in Figure 2 in Attachment A, Proposed Project Amendment Site Utilization Plan and summarized in Tables 1 through 3 in Attachment A.

As described above, the Proposed Project Amendment would also include a land exchange between the owner/applicant and CDFW, which would require the owner/applicant to transfer 339.7 acres to CDFW and record a conservation easement over 191.5 acres, and, in exchange, CDFW would transfer 219.4 acres in Village 14 to the owner/applicant to create a consolidated Development Footprint. The proposed land exchange between the applicant and CDFW is depicted in Figure 3 in Attachment A. As defined above, the Proposed Project Amendment requires a Specific Plan Amendment and Revised Tentative Map, which must be approved by the County. The Revised Tentative Map would replace that certain approved Tentative Map TM #5616, approved by the County on June 26, 2019. The Specific Plan Amendment would amend the Specific Plan 16-002 to reflect the Proposed Project Amendment, including the Revised Tentative Map and the land exchange with CDFW.

Proposed Project Amendment Relative to the Approved Project and the EIR Land Exchange Alternative.

The Final EIR evaluated both the Approved Project and the EIR Land Exchange Alternative at a project level of analysis. This Technical Memorandum examines whether the Final EIR,

through its analysis of the Approved Project and the EIR Land Exchange Alternative, covered all anticipated impacts of the Proposed Project Amendment. Figure 5 in Attachment A depicts the limits of the development contemplated under the Approved Project, the EIR Land Exchange Alternative, and the Proposed Project Amendment. Table 4 provides a summary of the components for the Proposed Project Amendment, the Approved Project, and the EIR Land Exchange Alternative. Note that from a geographical perspective, each acre that comprises the Proposed Project Amendment's Development Footprint is located either within the Approved Project Development Footprint or within the EIR Land Exchange Alternative Development Footprint. In other words, no portion of the Proposed Project Amendment Development Footprint is outside the combined Approved Project and EIR Land Exchange Alternative Development Footprints.

TABLE 4 PROPOSED PROJECT AMENDMENT COMPARISON TO APPROVED PROJECT AND EIR LAND EXCHANGE ALTERNATIVE						
Description  Proposed Project Amendment  Proposed Project Project Alternative						
Development Footprint (Acres)	579	809	658			
Project Area (Acres)	1,543	1,369	2,388			
Offsites (Acres)	40	85	40			
Units	1,266	1,119	1,530			
Proctor Valley Rd. Same Same Same						

#### Section 3. Approved Project CEQA Findings

To provide the appropriate context to compare the impacts of the Proposed Project Amendment with the impacts anticipated under the Approved Project, this section provides a summary of the Approved Project's Certified EIR Findings related to sewer impacts. Section IV, below, then describes the impacts of the Proposed Project Amendment and compares the anticipated impacts against the Approved Project and the Environmentally Superior Alternative, the EIR Land Exchange Alternative.

A summary of the key findings from the Approved Project and Land Exchange Alternative Final EIR reports are provided in the following sections.

A. Approved Project. The Approved Project will be provided sewer service by the San Diego County Sanitation District (SDCSD) via a sewage transportation agreement reached in 2016 with the City of Chula Vista for sewer service from the Salt Creek Interceptor. The Salt Creek Interceptor has been sized to accommodate ultimate development from a defined service area which includes the Approved Project.

To convey flows to the Salt Creek Interceptor, a series of gravity sewers, lift stations and force mains are required. Table 5 summarizes the projected sewer flows for the Approved Project that will be conveyed to the Salt Creek Interceptor.

TABLE 5 APPROVED PROJECT PROJECTED SEWER FLOW SUMMARY			
Description Projected Average Sewer Flow, gpd			
Village 14	245,486		
Planning Areas 16/19 30,700			
TOTAL 276,186			

The upstream end of the Salt Creek Interceptor is located within Proctor Valley Road approximately 1,600 feet east of Hunte Parkway, approximately two miles west of the Approved Project. The Village 14 area flows by gravity to an offsite lift station along Proctor Valley Road that pumps flows through dual force mains to the Salt Creek Interceptor. Flows from Planning Area 16/19 will be conveyed through Village 14, but will require a public sewer lift station and several private sewer lift stations to convey this flow to Village 14.

Flows from the project area have been included in Salt Creek Interceptor planning studies dating back to 1994. The June 2016 sewage transportation agreement between the City of Chula Vista and SDCSD identifies the service area and allowable flows from County properties. The agreement stipulates that up to 870,000 gpd average flow may be conveyed to the Salt Creek Interceptor from County properties with no upgrades to the interceptor. In establishing the flow limitation of 870,000 gpd, the County projected a total flow of 372,873

gpd from Village 14 and Planning Areas 16/19. Current flow projections for the Approved Project are well below this amount and therefore, it is concluded that there is capacity in the Salt Creek Interceptor for the Approved Project.

B. EIR Land Exchange Alternative. The EIR Land Exchange Alternative would remove development from Planning Areas 16 and 19 and concentrate development within Village 14. Proposed development for the EIR Land Exchange Alternative would be served by the SDCSD in the same manner as the Approved Project. Table 6 summarizes the projected sewer flows for the EIR Land Exchange Alternative.

TABLE 6 EIR LAND EXCHANGE ALTERNATIVE PROJECTED SEWER FLOW SUMMARY			
Description Projected Average Sewer Flow, gpd			
Village 14	378,786		
Planning Area 16/19 0			
TOTAL 378,786			

As with the Approved Project, an offsite sewer lift station along Proctor Valley Road would be required. The entire development could convey flow by gravity to this lift station and then dual force mains in Proctor Valley Road would convey flow from the lift station to the Salt Creek Interceptor

The sewage transportation agreement between the city of Chula Vista and SDCSD allows flows from County properties of up toe 870,000 gpd without any improvements to the Salt creek Interceptor. In establishing this flow limit, the County assumed a flow of 372,873 gpd from Village 14 and Planning Areas 16/19. Projected flows for the EIR Land Exchange Alternative are 378,786 gpd using County criteria and 367,182 gpd using City of Chula Vista criteria. Based on this, it was concluded that no improvements are required to the Salt Creek Interceptor for the EIR Land Exchange Alternative.

## Section 4. Proposed Project Amendment Impacts to Sewer

All development will be served by conveying flows to the Salt Creek Interceptor. Table 7 summarizes the projected sewer flows for the Proposed Project Amendment.

TABLE 7 PROPOSED PROJECT AMENDMENT PROJECTED SEWER FLOWS				
Land Use	Land Use Quantity Unit Water Demand			
Village 14				
R-1	103 units	240 gpd/unit	24,720	
R-2	136 units	240 gpd/unit	32,640	
R-3	112 units	240 gpd/unit	26,880	
R-4	73 units	240 gpd/unit	17,520	
R-5	121 units	240 gpd/unit	29,040	
R-6	47 units	240 gpd/unit	11,280	
R-7	150 units	192 gpd/unit	28,800	
R-8	116 units	240 gpd/unit	27,840	
R-9	96 units	240 gpd/unit	23,040	
R-10	31 units	240 gpd/unit	7,440	
R-11	119 units	240 gpd/unit	28,560	
R-12	94 units	240 gpd/unit	22,560	
R-17	10 units	240 gpd/unit	2,400	
R-18	45 units	240 gpd/unit	10,800	
MU-C	2.7 ac	1,500 gpd/ac	4,050	
PS-1	2.3 ac	1,500 gpd/ac	3,450	
S-1	800 students	4.8 gpd/student	3,840	
P-1	6.2 ac	500 gpd/ac	3,100	
P-2	3.9 ac	500 gpd/ac	1,950	
PP-1	2.8 ac	500 gpd/ac	1,400	
PP-2	2.1 ac	500 gpd/ac	1,050	
PP-3	1.9 ac	500 gpd/ac	950	
PP-4	1.5 ac	500 gpd/ac	750	
PP-5	0.8 ac	500 gpd/ac	400	

TABLE 7 PROPOSED PROJECT AMENDMENT PROJECTED SEWER FLOWS					
Land Use Quantity Unit Water Average Water Demand Demand, gpd					
PP-6	200				
Subtotal Village 14 314,660					
Planning Areas 16/19					
R-13	13 units	240 gpd/unit	3,120		
Subtotal Planning Area 16/2	Subtotal Planning Area 16/19 3,120				
TOTAL 317,780					

To convey flow to the Salt Creek Interceptor, an offsite lift station is required along Proctor Valley Road with offsite force mains in Proctor Valley Road. Development within Village 14 can flow by gravity to this lift station, but development in Planning Area 16 requires two lift stations to convey flows to the Village 14 collection system. These two lift stations would be entirely within the Proctor Valley Road improvements which differs from the Approved Project. This difference from the Approved Project does not create any additional impacts.

In establishing a flow limit, the County assumed a flow of 372,873 gpd from Village 14 and Planning Areas 16/19 Approved Project. The current projected flows from the Proposed Project Amendment are 317,780 gpd. Based on this, it was concluded that no improvements are required to the Salt Creek Interceptor for the Proposed Project Amendment.

Projected sewer flows for the Proposed Project Amendment as compared to the Approved Project and EIR Land Exchange Alternative are provided in Table 8.

TABLE 8 SEWER FLOW COMPARISON						
Average Sewer Flows, gpd						
Description	Proposed Project Amendment  Approved Project Alternative					
Village 14	314,660	245,486	378,786			
Planning Area 16/19	3,120 30,700 0					
TOTAL	317,780 276,186 378,786					
Proposed Residential Units	1,266 1,119 1,530					

As shown, the projected sewer flow for the Proposed Project Amendment is between the flow projections for the Approved Project and EIR Land Exchange Alternative. The proposed sewer system for the Proposed Project Amendment is provided as Exhibit A in Attachment B of this memorandum. The proposed regional sewer system does not propose any new facilities or areas of impact that were not already identified for the Approved Project or EIR Land Exchange Alternative.

#### Section 5. Certified EIR Mitigation Measures

There are no mitigation measures identified in the certified EIR related to sewer service. The Proposed Project Amendment does not require any proposed mitigation measures as a result of the proposed sewer system.

#### Section 6. Conclusion

The Otay Ranch Village 14 and Planning Area 16/19 Final EIR determined that impacts to sewer would be less than significant and did not require any mitigation measures for the Approved Project. Based upon the changes proposed under the Proposed Project Amendment, no new or greater impacts would occur to sewer and no mitigation is required.

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## ATTACHMENT A

# PROPOSED PROJECT AMENDMENT LAND USE SUMMARY AND GRAPHICS

Table 1
Village 14 and Planning Areas 16/19
Proposed Project Amendment
Site Utilization Plan Summary
November, 2019

	Village 14 Planning Area 16/19		Total Proposed Project			
	Gross	Target	Gross		Gross	Target
Description	Acres	Units	Acres	Units	Acres (1)	Units
Residential Subtotal (1)	386.6	1,253	14.9	13	401.4	1,266
Non-Residential Uses						
Mixed Use (2)	2.7				2.7	
Public Parks	10.2				10.2	
Private Parks/Recreation (3)	9.5				9.5	
Public Safety Site	2.3				2.3	
Elementary School Site	9.9				9.9	
Open Space	47.8		1.7		49.5	
Conserved Open Space	23.0		1.5		24.5	
Otay Ranch RMP Preserve	278.6		98.4		377.0	
Circulation	23.3		3.4		26.7	
Non-Residential Uses Subtotal	407.2		105.0		512.1	-
Total Proposed Project Amendment	793.7	1,253	119.8	13	913.6	1,266
Other Offsites						
Offsite Improvements	40.1				40.1	
Offsite Preserve PA16			58.3		58.3	
Parcels Exchanged to CDFW	147.3		192.4		339.7	
Conservation Easement PA16			191.5		191.5	
Total Proposed Project Amendment Project Ar	ea				1,543.1	1,266

<sup>(1)</sup> Tota residential gross acres includes 98.6 acres of related internal slopes, fuel modification and/or preserve edge open space lots.

<sup>(2)</sup> Village 14 Mixed Use acreage includes 10,000 sf of commercial use.

<sup>(3)</sup> Village 14 has 2.1 acres of private pocket parks included in the residential acreage; therefore the subtotal including PPP is 11.6 acres.

<sup>(4)</sup> May not total due to rounding.

# Table 2 Proposed Project Amendment Site Utilization Plan Detail November 1, 2019

VILLAGE 14				
Description		Gross Acres	Units	Density
Single Family Residential				•
R-1	50*100	33.1	103	3.1
R-2	60*100	48.3	136	2.8
R-3	60*85	35.8	112	3.1
R-4	60*100	31.5	73	2.3
R-5	75*100	51.7	121	2.3
R-6	60*85	22.5	47	2.1
R-8	Courtyard M	21.1	116	5.5
R-9	60*85	33.0	96	2.9
R-10	60*85	8.5	31	3.7
R-11	50*85 M	25.4	119	4.7
R-12	50*100	27.6	94	3.4
R-17	70*100	7.4	10	1.3
R-18	70*100	27.8	45	1.6
Cinala Escalla Davida di 1	71-1-1	272.0	1 102	2.0
Single Family Residential S	Subtotal	373.8	1,103	3.0
MultiFamily			4.50	44.0
R-7	MF	12.7	150	11.8
MF Subtotal  Kesidential Subtotal (*)		12.7	150 <b>1,253</b>	11.8
		386.6	1,253	3.2
Non-Residential Uses Mixed Use (4)	MIL C	2.7		
	MU - C	2.7		
Public Parks				
7.4				
P-1	Village Green Park	6.2		
P-2	Scenic Park	3.9		
Public Parks Sul		10.2		
Private Parks &		• 0		
PP-1	Central	2.8		
PP-2	Village Core	2.1		
PP-3	West	1.9		
PP-4	West	1.5		
PP-5	northwest	0.8		
PP-6	Northeast	0.4		
PPP (3)	Various	0.0		
Private Parks/Recreation Subtotal		9.5		
Public Safety Site		2.3		
Elementary School Site		9.9		
Open Space		47.8		
Conserved Oper		23.0		
Otay Ranch RM		274.9		
Circulation - In		3.7		
Circulation - Ar		23.3		
Non-Residential Uses Subt	otal	407.2		
Village 14 Subtotal		793.7	1,253	1.6

<sup>(1)</sup> Residential gross acres includes 96.5 acres of related internal slopes, fuel modification and/or preserve edge open space lots.

<sup>(2)</sup> Village 14 Mixed Use acreage includes 10,000 sf of commercial use.

 $<sup>(3) \ \</sup>textit{Village 14 has 2.1 acres of private pocket parks included in the residential acreage; therefore the subtotal including PPP is 11.6 acres.}$ 

<sup>(4)</sup> May not total due to rounding.

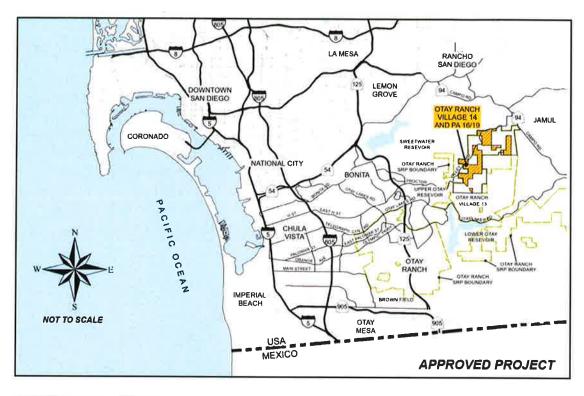
Table 3
Proposed Project Amendment
Site Utilization Plan Detail
November 1, 2019

PLANNING AREA 16/19							
Description Gross Acres Units Density							
Residential Uses							
R-13 PA 19 Estates	14.9	13	0.9				
Residential Subtotal (1)	14.9	13	0.9				
Non-Residential Uses							
Circulation in Preserve	1.4						
Open Space	1.7						
Conserved Open Space	1.5						
Otay Ranch RMP Preserve	97.0						
Circulation Arterial	3.4						
Non-Residential Uses Subtotal	105.0						
Planning Area 19 Subtotal	119.8	13	0.1				
Proposed Project Amendment Total	913.6	1,266	1.4				

OTHER					
Description	Gross Acres	Units	Density		
Other Applicant Owned NAP of TM					
PV1 exchanged to CDFW	18.9				
PV3 exchanged to CDFW	128.4				
R-15 Exchanged to CDFW	49.9				
R-16 Exchanged to CDFW	142.5				
R-14 Conservation Easement Area	191.5				
R-15 Preserve	10.5				
R-16 Preserve	47.8				
Subtotal	589.5				
Offsite Acres	40.1				
Proposed Project Amendment Project Area	1,543.1	1,266			

#### Notes:

- $(1) Residential\ gross\ acres\ includes\ 2.1\ acres\ of\ related\ internal\ slopes,\ fuel\ modification\ and/or\ preserve\ edge\ open\ space\ lots.$
- (2) May not total due to rounding.



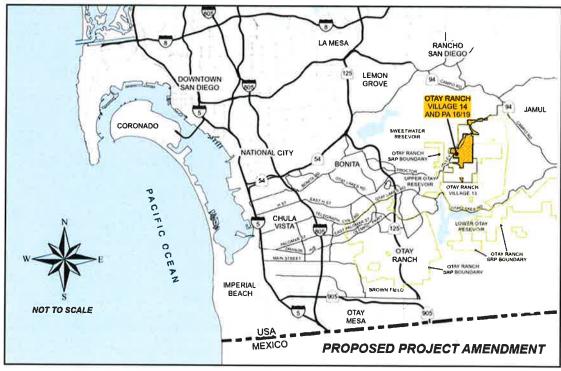
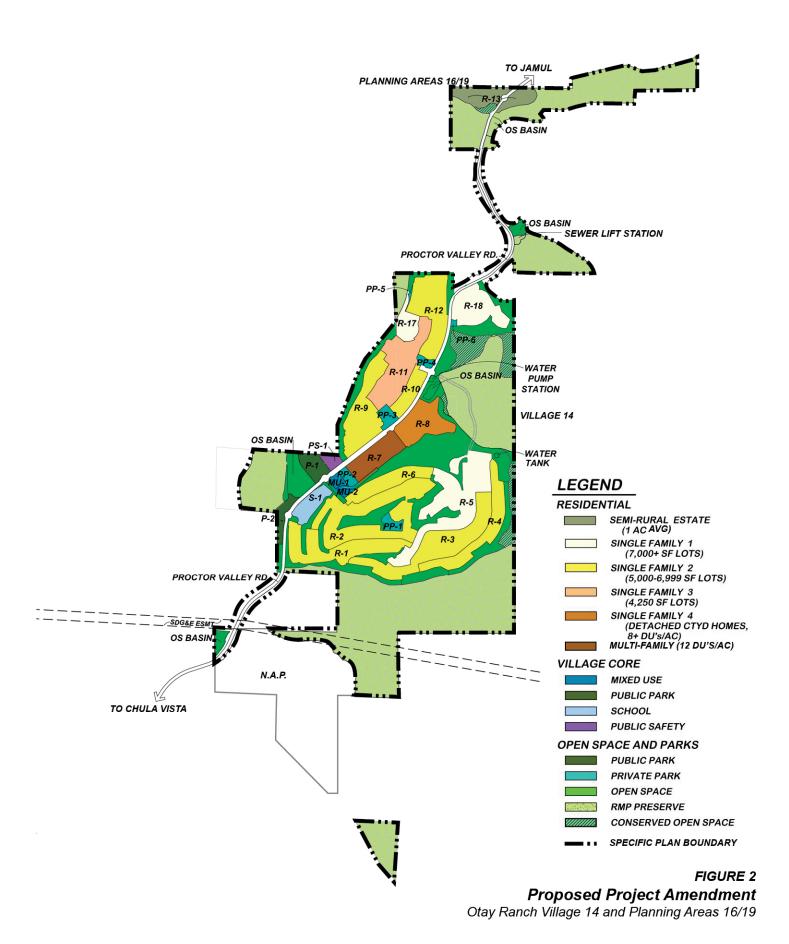
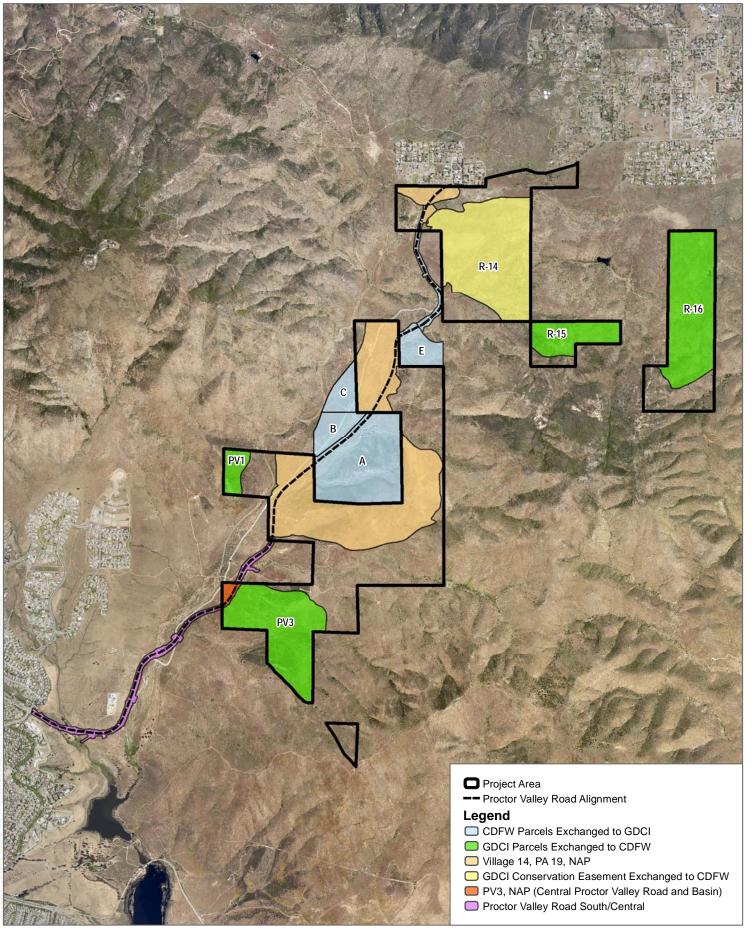


FIGURE 1
Regional Location Map

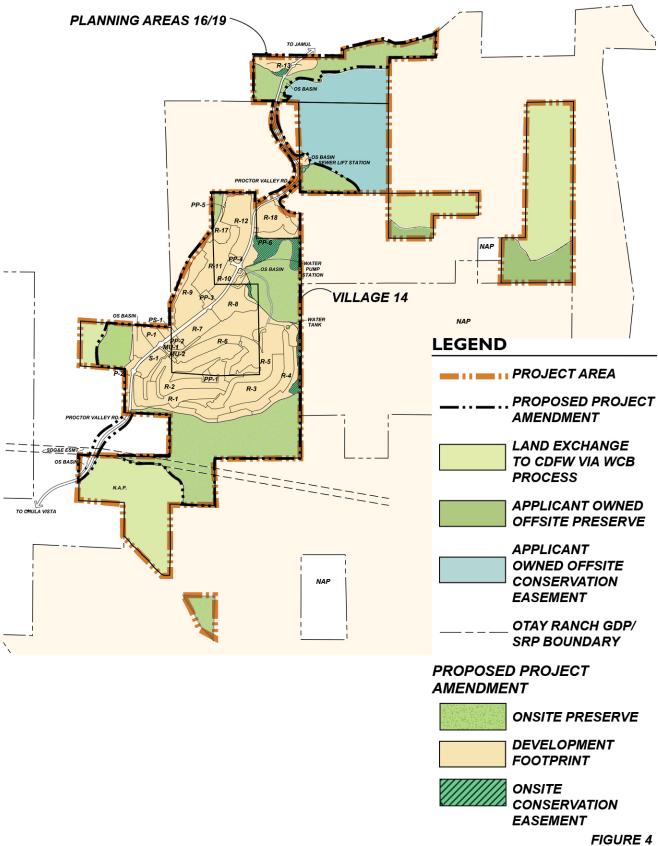




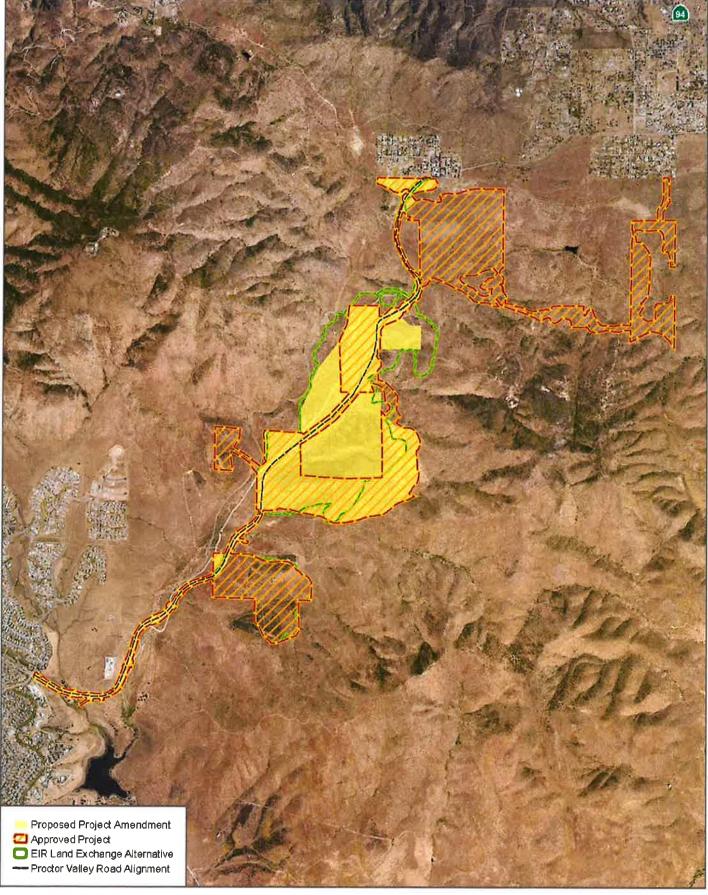
SOURCE: SANGIS 2017; Hunsaker 2019

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FIGURE 3



Proposed Project Amendment - Project Area Otay Ranch Village 14 and Planning Areas 16/19



SOURCE: SANGIS 2017; Hunsaker 2019

FIGURE 5
Certified EIR Study Area

### ATTACHMENT B

# PROPOSED PROJECT AMENDMENT PROPOSED SEWER SYSTEM EXHIBIT

