



County of San Diego

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DIRECTOR

September 4, 2025

CEQA Initial Study - Environmental Checklist Form (Based on the State CEQA Guidelines, Appendix G)

1. Title: San Luis Rey Training Center Major Grading Permit
Project Number(s): PDS2019-LDGRMJ-30228, PDS2016-ENFGEN-000940, PDS2022-ER-22-07-002
2. Lead agency name and address:
County of San Diego, Planning & Development Services (PDS)
5510 Overland Avenue, Suite 310
San Diego, CA 92123-1239
3. a. Contact: Ashley Smith, Chief
b. Phone number: (619) 857-8012
c. E-mail: Ashley.Smith2@sdcounty.ca.gov
4. Project location:
5772 Camino Del Rey, Bonsall Community Planning Area, County of San Diego
Thomas Guide Coordinates: Page 1068, Grid D/2
APNs 127-460-13-00, 127-460-12-00
5. Project Applicant name and address:
Beverly Gnau, SLR Training Center Inc., 5772 Camino Del Rey, Bonsall, CA 92003
6. General Plan
Community Plan: Bonsall
Land Use Designation: Semi-Rural 2 (SR-2)
Density: N/A
Floor Area Ratio (FAR) N/A

7. Zoning
Use Regulation: Limited Agriculture (A70), General Agriculture (A72)
Minimum Lot Size: 2 acres
Special Area Regulation: Por F (Flood Plain)
C (Airport Land Use Compatibility Plan Area)
8. Description of project:
The project includes a Major Grading Permit (PDS2019-LDGRMJ-30228) consisting of the even cut and fill of 10,400 cubic yards of soil balanced onsite on approximately 2.88 acres, to remedy a code violation case (PDS2016-ENFGEN-000940) for the San Luis Rey Training Center (project). The San Luis Rey Training Center is a thoroughbred racehorse training facility owned and operated by Los Angeles Turf Club, Incorporated. The San Luis Rey Training Center is located within the Bonsall Community Plan area of the unincorporated San Diego County and spans across twelve parcels totaling 204 acres governed by the "San Luis Rey Downs Private Development Plan (PDP)", adopted in November 1977. The code violation case is for the unpermitted clearing and grading of an access driveway and dirt roads, located on a portion southeast of the training center, partially inside and outside the existing PDP boundary, both owned by the Los Angeles Turf Club, Incorporated. The grading permit encompasses two areas of partially developed land. These violation areas are currently used for site access from Camino Del Rey, onsite roads, borrow site, staging equipment, and temporary structures, of which the latter would be removed. The grading permit would stabilize the existing slopes and bring the project site into compliance with County regulations. Grading operations would take approximately 9 to 12 weeks.
9. Surrounding land uses and setting:

The project site is located in the Bonsall Community Plan area. The community of Bonsall is characterized by a series of hills, valleys, and drainage areas. Development in Bonsall, and surrounding the project site, consists of low-density residential uses and agricultural land uses. The parcels adjacent to the project site on the east are designated Limited Agriculture (A70) by the Zoning Ordinance, and Semi-Rural Residential (SR-2) by the General Plan, which allows for agricultural and residential use types. The project site abuts a County-maintained road, Camino Del Rey, to the south. Across Camino Del Rey additional horse facilities exist that are also governed by the PDP. The remainder of the area surrounding the project site is part of the San Luis Rey Training Center.
10. Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement):

Permit Type/Action	Agency
General Construction Storm Water Permit	RWQCB
Waste Discharge Requirements Permit	RWQCB
Stormwater Pollution Prevention Plan	RWQCB
Fire District Approval	North County Fire Protection District

Note: RWQCB = Regional Water Quality Control Board

11. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code §21080.3.1? If so, is there a plan that includes consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?

YES

☒

NO

☐

Note: Conducting consultation early in the CEQA process allows tribal governments, public lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and to reduce the potential for delay and conflict in the environmental review process (see Public Resources Code §21080.3.2). Information is also available from the Native American Heritage Commission's Sacred Lands File per Public Resources Code §5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code §21082.3(e) contains provisions specific to confidentiality.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED: The environmental factors checked below would be potentially affected by this project and involve at least one impact that is a "Potentially Significant Impact" or a "Less Than Significant With Mitigation Incorporated," as indicated by the checklist on the following pages.

☐ Aesthetics

☒ Biological Resources

☒ Geology & Soils

☐ Hydrology & Water Quality

☐ Noise

☐ Recreation

☐ Utilities & Service Systems

☐ Agriculture and Forestry Resources

☒ Cultural Resources

☐ Greenhouse Gas Emissions

☐ Land Use & Planning

☐ Population & Housing

☐ Transportation

☐ Wildfire

☐ Air Quality

☐ Energy

☐ Hazards & Haz. Materials

☐ Mineral Resources

☐ Public Services

☒ Tribal Cultural Resources

☒ Mandatory Findings of Significance

DETERMINATION: (To be completed by the Lead Agency)

On the basis of this initial evaluation:

- ☐ On the basis of this Initial Study, PDS finds that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- ☒ On the basis of this Initial Study, PDS finds that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- ☐ On the basis of this Initial Study, PDS finds that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

_____ Signature	September 4, 2025 _____ Date
Souphalak Sakdarak _____ Printed Name	Environmental Planner _____ Title

INSTRUCTIONS ON EVALUATION OF ENVIRONMENTAL IMPACTS

1. A brief explanation is required for all answers except “No Impact” answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A “No Impact” answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
2. All answers must take account of the whole action involved, including offsite as well as onsite, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, Less Than Significant With Mitigation Incorporated, or less than significant. “Potentially Significant Impact” is appropriate if there is substantial evidence that an effect may be significant. If there are one or more “Potentially Significant Impact” entries when the determination is made, an EIR is required.
4. “Less Than Significant With Mitigation Incorporated” applies where the incorporation of mitigation measures has reduced an effect from “Potentially Significant Impact” to a “Less Than Significant Impact.” The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level.
5. Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
 - a) Earlier Analysis Used. Identify and state where they are available for review.
 - b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c) Mitigation Measures. For effects that are “Less Than Significant With Mitigation Incorporated,” describe the mitigation measures that were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
7. The explanation of each issue should identify:
 - a) The significance criteria or threshold, if any, used to evaluate each question; and
 - b) The mitigation measure identified, if any, to reduce the impact to less than significance

I. AESTHETICS -- Except as provided in Public Resources Code §21099 -- Would the project:

a) Have a substantial adverse effect on a scenic vista?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation: 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 (GPU) Environmental Impact Report (EIR; County of San Diego 2011a), 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.

Less than Significant Impact:

The project includes a Major Grading Permit consisting of the even cut and fill of 10,400 cubic yards of soil on approximately 2.88 acres to remedy a code violation case for the San Luis Rey Training Center in the unincorporated community of Bonsall. Surrounding land uses consist of rural residential and agricultural land use types to the east, and other portions of the San Luis Ray Training Center surrounding the remainder of the project site. The closest RCAs to the project site are Mission Road (#12 of the Bonsall Community Plan) to the north, south, and west with the closest point approximately 1.1 miles to the west, and Lancaster Mountain (#21 of the Valley Center Community Plan) approximately 4.14 miles to the east (County of San Diego 2011b).

Mission Road is described as an area of great scenic beauty and encompasses a creek called Ostrich Creek, which drains into the San Luis Rey River. Due to the distance and elevation of Mission Road, and that the project would remedy a code violation case and not proposing any structures, no impacts would occur to Mission Road. Lancaster Mountain contains mixed chaparral, wildlife habitat, and is a scenic landmark. There are designated trails that afford views of the project site from Lancaster Mountain; however, due to the distance of the project site and the relatively small amount of grading that would occur along with the surrounding development, the project would not impact views from Lancaster Mountain. Likewise, the project would not interfere with any views of Lancaster Mountain from the project site or surrounding areas due to distance, intervening structures and topography, as well as the project scope, which only includes grading. Therefore, the project would have a less than significant effect on a scenic vista.

b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation: 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.

Less than Significant Impact: The project site is not located near or visible within the composite viewshed of a State scenic highway and would not damage or remove visual resources within a State Scenic highway. State Route 76, approximately 1.2 miles west of the project site, is identified by Caltrans as eligible for a Scenic highway designation. However, the closest State-designated Scenic Highway, State Route 52, is approximately 31 miles south of the project site. The County has also identified roadways in the Conservation Element of the General Plan that are considered County Scenic Corridors. The project site abuts Camino Del Rey, a County Scenic Corridor identified in the Conservation Element (#21). The project site is currently used for site access from Camino Del Ray, as well as a borrow site, with staging equipment and temporary structures. The project would remove the unpermitted structures and remedy the code violation case by stabilizing the slope and bringing the project site into compliance with County regulations. No trees, rock outcroppings, or historic buildings would be removed as part of the project. In addition, due to the limited grading that is required, the existing site setting, the short project duration of 9 to 12 weeks, and the speed of travel by cars on Camino Del Rey, visual resource impacts from Camino Del Rey would be minimal during grading. In addition, because the project would not construct any structures, the project operations would not substantially damage scenic resources within a scenic highway.

c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced

from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation: 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.

Less than Significant Impact: The Bonsall Community Plan describes Bonsall's community character as primarily low-density residential, agricultural, and equestrian uses surrounded by large open spaces composed of fallow fields, undisturbed native vegetation, and agriculture.

The project site is not located in an urbanized area but has been previously disturbed and is an open violation case. This project would remedy the code violation case by removing the temporary structures onsite, stabilizing the slope, and bringing the site into compliance with County regulations. In addition, no structures are proposed as part of the project. Therefore, due to the minimal grading required, the project would not substantially degrade the existing visual character or quality of public views. In addition, the project is an extension of the San Luis Rey Training Center, a thoroughbred racehorse training facility that contributes rural and equestrian character to the Bonsall area.

- d) Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less than Significant Impact: The project is located within Zone B as identified by the San Diego County Light Pollution Code. Zone B is an area that is more than 15 miles from the Mount Palomar or Mount Laguna observatory. The project would remedy the code violation case through grading and would permit the access road. No outdoor lighting is proposed. Therefore, the project would not adversely affect nighttime views or astronomical observations because the project would conform to the County's Light Pollution Code (Section 51.201-51.209). The project would not create a significant new source of substantial light or glare, which would adversely affect daytime or nighttime views in the area.

II. AGRICULTURE AND FORESTRY RESOURCES -- Would the project:

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

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less than Significant Impact: The project site has been designated by the Farmland Mapping and Monitoring Program (FMMP) as "Farmland of Local Importance." However, the project site does not have a history of agricultural use outside of the existing equestrian uses. Pursuant to the County's Guidelines for Determining Significance for Agricultural Resources (Agricultural Guidelines), even if a site is designated by the FMMP, if a site has never been used for agriculture, these lands should not be considered agricultural resources. Further, the project site is not designated as Prime Farmland or Farmland of Statewide Importance, which are designations that should be avoided according to the Agricultural Guidelines. In addition, the site does not meet the definition of an agricultural resource as defined by the Agricultural Guidelines, since the site is not an active agricultural operation, is not designated and meets the definition of an important Farmland Category by the FMMP, and is not a site with a history of agricultural production based on aerial photography or other data sources. Therefore, the project would not convert an important farmland category designated by the FMMP to a non-agricultural use.

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

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less than Significant Impact: The project site is zoned Limited Agriculture (A70) and General Agriculture (A72). The A70 and A72 land use regulations allow for residences and agricultural use types. Determining if a site allows for equestrian use types is based off the animal designator. The portion of the project site located within the PDP has an animal designator of "X", which allows for horse stables and associated equestrian uses by-right. The portion of the project site located outside of the boundary of the PDP has an animal designator of an "L", which allows for horse stables with an additional Zoning Verification or discretionary permit, dependent upon the number of horses and land acreage. The project site has historically been either used or owned by the San Luis Rey Training Center, and does not have a history of agricultural use. In addition, the project site is not located within or in the vicinity of a Williamson Act Contract or Agricultural Preserve. The closest Williamson Act Contract or agricultural preserve to the project site is located approximately 0.7 mile, or 3,696 feet, south across Camino Del Rey. According to the Agricultural Guidelines, interface conflicts usually only occur within 300 feet. Therefore,

the project would not conflict with the existing zoning for agricultural use, or a Williamson Act Contract.

- c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code §12220(g)), or timberland (as defined by Public Resources Code §4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: The project site, including offsite improvements, does not contain forest land or timberland. The County of San Diego does not have any existing Timberland Production Zones. In addition, the project would be consistent with existing zoning and a rezone of the property is not proposed. Therefore, project implementation would not conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland production zones.

- d) Result in the loss of forest land or conversion of forest land to non-forest use?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: The project site, including any offsite improvements, do not contain any forest lands as defined in Public Resources Code §12220(g); therefore, project implementation would not result in the loss or conversion of forest land to a non-forest use. A portion of the Cleveland National Forest is located approximately 12.2 miles to the east of the project site. Therefore, due to distance the project site to the Cleveland National Forest, the project would not result in the loss of forest land or conversion of forest land to a 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 or conversion of forest land to non-forest use?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less than Significant Impact: As described above in Section II. Agriculture and Forestry Resources, a), the project has been determined to not meet the definition of an agricultural resource pursuant to the Agricultural Guidelines. In addition, the project is not under a Williamson

Act Contract or agricultural preserve, nor is the project site located within the vicinity of a Williamson Act Contract or an Agricultural Preserve. The project site is also compatible with agricultural use types due to its rural nature. Therefore, the project would not have significant adverse impacts related to the conversion of Important Farmland or other agricultural resource to a non-agricultural use. In addition, as described above in Section II. Agriculture and Forestry Resource, c) and d), the project would not result in the loss of forest land or conversion of forest land to non-forest use.

III. AIR QUALITY -- Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. 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"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation: The RAQS rely on population and projected growth in the County and project future mobile, area, and all other source emissions. Based on these emissions, the RAQS determine the strategies necessary for the reduction of stationary source emissions through regulatory controls. Mobile source emission projections and growth projections are based on population and vehicle trends and land use plans developed by the cities and the County. As such, projects that are consistent with the growth anticipated in the General Plan would be considered consistent with the RAQS.

Less Than Significant Impact: The project would remedy an existing code violation case through a grading permit and permit an access road. The project would produce emissions during grading operations. Equipment use required for grading activities include tractors, loaders, backhoes, dozers, excavators, blades, and concrete trucks. Operationally, the project would not produce any additional emissions beyond existing conditions.

The project is consistent with the General Plan category and zoning through the PDP adopted in November 1977 that governs the site and requires a grading plan to remedy the existing code violation case (see Section VII. Geology and Soils). The grading requires the even cut and fill of 10,400 cubic yards of soil, balanced onsite. No soil import or export would be required. Although temporary air emissions would be produced during grading activities as discussed in Section III. Air Quality, b), no new development is proposed, and no long-term emissions from mobile or other sources would be produced once the construction activities are complete. The project is consistent with the intended use of the site and, therefore, consistent with the regional growth projections by the San Diego Association of Governments (SANDAG) and those used in the development of the RAQS and SIP. Therefore, the project would not conflict with or obstruct the implementation of the RAQS or the SIP, and impacts would be less than significant.

b) 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?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation: The San Diego Air Pollution Control District (APCD) does not provide quantitative thresholds for determining the significance of construction or mobile source-related impacts. However, the APCD does specify Air Quality Impact Analysis (AQIA) trigger levels for new or modified stationary sources (APCD Rules 20.2 and 20.3). If these incremental levels for stationary sources are exceeded, an AQIA must be performed for the proposed new or modified source. Although these trigger levels do not generally apply to mobile sources or general land development projects, for comparative purposes these levels may be used to evaluate the increased emissions which would be discharged to the San Diego Air Basin from proposed land development projects. For projects whose stationary-source emissions are below these criteria, no AQIA is typically required, and project level emissions are presumed to be less than significant.

For CEQA purposes, these screening level thresholds (SLTs) can be used to demonstrate that a project's total emissions would not result in a significant impact to air quality. The daily SLTs are most appropriately used for the standard construction and operational emissions. When project emissions have the potential to approach or exceed the SLTs listed below in Table 1, additional air quality modeling may need to be prepared to demonstrate that ground level concentrations resulting from project emissions (with background levels) would be below National and California Ambient Air Quality Standard (NAAQS and CAAQS, respectively).

APCD Rules 20.2 and 20.3 do not have AQIA thresholds for emissions of volatile organic compounds (VOCs) and PM_{2.5}. The use of the screening level for VOCs specified by the South Coast Air Quality Management District (SCAQMD), which generally has stricter emissions thresholds than San Diego's APCD, is recommended for evaluating projects in San Diego County. For PM_{2.5}, the U.S. Environmental Protection Agency (USEPA) "Proposed Rule to Implement the Fine Particle National Ambient Air Quality Standards" published September 8, 2005, which quantifies significant emissions as 10 tons per year, will be used as the screening-level criteria as shown in Table 1 below:

Table 1. San Diego County Screening-Level Thresholds for Air Quality Impact Analysis

Pollutant	Total Emissions		
	Lbs. per Hour	Lbs. per Day	Tons per Year
Respirable Particulate Matter (PM ₁₀)	---	100	15
Fine Particulate Matter (PM _{2.5})	--- *	55	10*
Nitrogen Oxides (NO _x)	25	250	40
Sulfur Oxides (SO _x)	25	250	40
Carbon Monoxide (CO)	100	550	100
Lead	---	3.2	0.6
Volatile Organic Compounds (VOCs)	---	75**	13.7***

Notes: * USEPA "Proposed Rule to Implement the Fine Particle National Ambient Air Quality Standards" published September 8, 2005. Also used by the SCAQMD.

** Threshold for VOCs based on the threshold of significance for VOCs from the SCAQMD for the Coachella Valley.

*** 13.7 Tons Per Year threshold based on 75 lbs/day multiplied by 365 days/year and divided by 2,000 lbs/ton.

Less Than Significant Impact: Currently, San Diego County is in “non-attainment” status for the NAAQS and CAAQS federal and state Ozone (O₃) and state Particulate Matter less than or equal to 10 microns and less than or equal to 2.5 microns (PM₁₀ and PM_{2.5}). O₃ is formed when volatile organic compounds (VOCs) and nitrogen oxides (NO_x) react in the presence of sunlight. VOC sources include any source that burns fuels (e.g., gasoline, natural gas, wood, oil); solvents; petroleum processing and storage; and pesticides. Sources of PM₁₀ in both urban and rural areas include the following: motor vehicles, wood burning stoves and fireplaces, dust from construction, landfills, agriculture, wildfires, brush/waste burning, and industrial sources of windblown dust from open lands.

Air quality emissions associated with the project would include PM, NO_x, CO, and VOCs from grading activities. The project would not contribute to any operational sources outside of existing conditions because no new development is proposed, and no long-term emissions from mobile or other sources would be produced once the construction activities are complete. The project would grade 2.88 acres and requires minimal work to remedy the code violation case. This is based on the grading schedule requiring 9 to 12 weeks of work, with no import or export of material required. In addition, grading operations associated with the project would be subject to the County of San Diego Grading Ordinance and the San Diego Air Pollution Control District (SDAPCD) Rule 55, which requires the implementation of dust control measures (e.g., watering, application of surfactants, control of vehicle speeds) during grading activities. An analysis of estimated construction emissions from project grading was completed using SCAQMD’s California Emissions Estimator Model (CalEEMod) Version 2020.4.0 (see Appendix A; it should be noted that this version of CalEEMod generally provides more conservative default assumptions and results than the most recent version [Version 2022.1]). As shown in Table 2 below, project-related air emissions are not anticipated to reach screening-level thresholds identified in Table 1 as established by the San Diego County APCD. Therefore, the project would not result in substantial emissions such that any criteria pollutant air quality standard would be violated. Therefore, the project would not result in a cumulatively considerable net increase of any criteria pollutant; impacts would be less than significant.

Table 2. Estimated Project-Related Air Emissions

Pollutant	Project Emissions (Lbs. per Day)	Screening-Level Thresholds (Lbs. per Day)	Above Threshold?
Respirable Particulate Matter (PM ₁₀)	31.51	100	No
Fine Particulate Matter (PM _{2.5})	6.37	55	No
Nitrogen Oxides (NO _x)	14.49	250	No
Sulfur Oxides (SO _x)	0.02	250	No
Carbon Monoxide (CO)	9.05	550	No
Volatile Organic Compounds (VOCs)	1.37	75	No

Note: CalEEMod does not report on lead emissions and therefore, it is not included in this analysis.

Source: See Appendix A.

c) Expose sensitive receptors to substantial pollutant concentrations?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation: Air quality regulators typically define sensitive receptors as schools (Preschool-12th Grade), hospitals, resident care facilities, or day-care centers, or other facilities that may house individuals with health conditions that would be adversely impacted by changes in air quality. The County of San Diego also considers residences as sensitive receptors since they house children and the elderly.

Less than Significant Impact: Existing residences are located as close as approximately 90 feet east of the project site and therefore, are within 0.25 mile of the project site (the radius determined by the SCAQMD in which the dilution of pollutants is typically significant). The project includes a Major Grading Permit that would not result in any permanent structures and for which grading activities would be temporary (approximately 9 to 12 weeks). Given the proposed short-term operation of equipment that would emit diesel exhaust emissions, no significant health risk impacts would occur. The onsite conditions of the slope variability and retaining wall between the proposed grading location and the existing nearby residences would result in dispersal of diesel exhaust and a reduced concentration. The project would also be required to comply with the County Grading Ordinance and SDAPCD Rule 55, which would reduce potential emissions of fugitive dust. Grading emissions would be temporary and would not expose sensitive receptors to harmful concentrations of air pollutants. The project would also not result in any operational emissions above existing conditions. Therefore, the project would not propose uses or activities that would result in exposure of identified sensitive receptors to substantial pollutant concentrations and impacts would be less than significant.

d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less than Significant Impact: According to the San Diego County Guidelines for Determining Significance for Air Quality (Air Quality Guidelines), land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. Because the project would remedy a grading violation case and no new use types or structures are proposed, the project does not include any uses identified by the Air Quality Guidelines as being associated with odors. Thus, operation of the proposed project is not expected to result in objectionable odors for residents of the neighboring uses. Potential sources that may emit odors during grading activities include combustion engine equipment but would not be considered significant due to the highly dispersive nature of diesel exhaust. As odors associated with the project construction would be temporary and intermittent in nature, and dissipate from the source over increasing

distance, no significant odors would be expected to affect surrounding receptors. Therefore, impacts would be less than significant.

IV. BIOLOGICAL RESOURCES -- Would the project:

- a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a 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"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input checked="" type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation: A Biological Resources Report has been prepared by ECORP Consulting, Inc., dated March 9, 2022 (Appendix B). The following responses have incorporated the analysis from the report.

Less than Significant with Mitigation Incorporated: Based on an analysis of the County's Geographic Information System (GIS) records, the County's Comprehensive Matrix of Sensitive Species, and a Biological Resource Letter Report dated March 9, 2022, prepared by ECORP Consulting, it has been determined that the site, and surrounding area, supports native vegetation, namely disturbed Diegan coastal sage scrub. No special status plant species were observed on the site and none are likely to occur. Protocol-level coastal California gnatcatcher surveys were conducted as part of the Biological Resources Report and provided negative results. Two sensitive wildlife species, turkey vulture and red-shouldered hawk, were observed on the site and five additional wildlife species have a moderate to high potential to occur. The project would impact 0.346 acres of disturbed coastal sage scrub and sensitive wildlife species occurring or with potential to occur on the site. Due to the minimal amount of coastal sage scrub impacts (0.346 acres) and negative results of the gnatcatcher surveys, the project qualifies for a de minimis Habitat Loss Permit under the County's Habitat Loss Permit Ordinance. County staff determined that removal of this habitat would not result in substantial adverse effects with the incorporation of mitigation. The proposed mitigation consists of the implementation of Best Management Practices (BMPs) to minimize impacts to coastal sage scrub habitat, aquatic habitats, and sensitive species (MM BIO-1 and MM BIO-2), purchase of mitigation credits at a 2:1 ratio (in the amount of 0.692 acre) of Diegan coastal sage scrub at a County-approved mitigation bank in accordance with the Habitat Loss Permit Ordinance (MM BIO-4), and biological monitoring (MM BIO-5). The project would also be conducted in compliance with the Migratory Bird Treaty Act, which would require nesting surveys and other provisions if construction work must be conducted during the nesting season (January 15 to August 31) (MM BIO-3). Therefore, the impact is less than significant with mitigation incorporated.

MM BIO-1 Minimization of Direct Impacts to Disturbed Diegan Sage Scrub Habitat and Associated Species

Prior to or during construction, grading area boundaries shall be staked with the supervision of a qualified biologist, to minimize direct impacts to disturbed coastal sage scrub habitat to the

maximum extent practicable. A biologist shall be onsite during all work activities that involve placement of fill where necessary within the disturbed coastal sage scrub habitat to assist. Any activities within and adjacent to this habitat should be planned to occur outside of the breeding season for coastal California gnatcatcher (February 15-August 31). Also, see BIO-4 for additional measures relating to avoidance of permanent impacts to Diegan coastal sage scrub and associated species.

MM BIO-2 Standard BMPs to Reduce Effects of Construction Dust and Erosion

Limits of work should be designated and clearly demarcated, and specifications should provide a stringent level of BMPs to control dust, runoff, and spills and prevent indirect effects to the adjacent sensitive habitats (coastal sage scrub and aquatic habitats). Limits will be marked with temporary fencing that is suitable as a barrier for dust control.

To prevent degradation of adjacent habitats from deposition of dust during grading activities, exposed soils must be stabilized, through watering or other measures, to prevent movement of dust at the project site caused by wind and construction activities such as grading and traffic. To reduce potential impacts related to erosion, BMPs including slope stabilization and control of runoff should be implemented during construction.

MM BIO-3 Compliance with Migratory Bird Treaty Act

Construction activity should occur between September 1 and January 14 and outside of the nesting season (January 15 to August 31). However, if construction does occur within the nesting season, surveys for migratory bird and raptor nests should be conducted. These surveys should be performed by a qualified biologist within 72 hours prior to the commencement of construction activities. Surveys should include the construction area plus a 500-foot buffer. Survey findings shall be documented prior to initiating any construction activities. If active nests are found during nesting bird survey, appropriately sized no-work buffers (generally 50 to 300 feet depending on species sensitivity) shall be established around the active nests identified within and adjacent to the project site. The qualified biologist will determine the appropriate buffer size and level of nest monitoring necessary for species not listed under the federal Endangered Species Act (ESA) or the California ESA based on the species' life history, the species' sensitivity to disturbances (e.g., noise, vibration, human activity), individual behavior, status of nest, location of nest and site conditions, presence of screening vegetation, anticipated project activities, ambient noise levels compared to project-related noise levels, existing non-project-related disturbances in vicinity, and ambient levels of human activity.

Buffers shall be marked (flagged or fenced with Environmentally Sensitive Area fencing) around any active nests and periodic monitoring by the qualified biologist will occur to ensure the Project does not result in the failure of the nest. The buffer(s) will be maintained around each nest until the nest becomes inactive as determined by the qualified biologist. At the discretion of the qualified biologist, if a nesting bird appears to be stressed as a result of project activities and the buffer does not appear to provide adequate protection, additional minimization measures may need to be implemented.

Construction can continue outside of the no-work buffers. The qualified biologist shall ensure that restricted activities occur outside of the delineated buffers, check nesting birds for any potential indications of stress, and ensure that installed fencing or flagging is properly maintained

during nest monitoring and any additional site visits. Buffer sizes may be adjusted (either increased or reduced), or the extent of nest monitoring may be adjusted, at the discretion of the qualified biologist based on the conditions of the surrounding area and/or the behavior of the nesting bird.

Any changes to buffer sizes and/or nest monitoring frequency shall be documented.

If listed species are found to be nesting in the survey area, construction activity should not occur without coordination with regulating agencies and may require an agency-approved bird management plan.

MM BIO-4 Compliance with Habitat Loss Permit

Per the Habitat Loss Permit Ordinance, mitigation is required for impacts to coastal sage scrub habitat. The mitigation ratio is based on the quality of the habitat and consultation with the wildlife agencies (U.S. Fish and Wildlife Service and California Department of Fish and Wildlife). Due to the minimal amount of coastal sage scrub impacts (0.346 acres) and negative results of the gnatcatcher surveys, the project qualifies for a de minimis Habitat Loss Permit. Mitigation credits at a 2:1 ratio (in the amount of 0.692 acre) of Diegan coastal sage scrub shall be purchased from a County-approved mitigation bank prior to issuance of the grading permit.

MM BIO-5 Additional Measures for Protection of Sensitive Species

To avoid impacts to arroyo toad, western spadefoot toad, orange-throated whiptail, coastal whiptail, southern California legless lizard, and coast horned lizard a biological monitor should be onsite on an as-needed basis to conduct morning sweeps and relocate sensitive wildlife prior to the commencement of work. Additionally, project work should not occur during rain events.

MM BIO-6 Seasonal Pre-Construction Crotch Bumble Bee (CBB) Nesting Survey

Based on the lack of CBB records within 5 miles of the Project Area and the limited amount of habitat that only provides low-to-moderate quality potential nesting and foraging habitat, CBB has a low potential to occur within the Project Area. The Project would not have a substantial adverse effect, either directly or through habitat modifications on CBB. Grading activities within this highly disturbed environment that provides low to moderate quality foraging habitat would not result in significant impacts to CBB unless a CBB nest was present at the time of grading or other Project-related ground-disturbing activities. Should a nest be present within the Project's impact area at the time of Project construction, ground-disturbing activities may cause death or injury of adults, eggs, and larva; burrow collapse; nest abandonment; and/or reduced nest success. In addition to minimization and avoidance measures outlined in the Biological Resources Letter Report (ECORP 2022), Mitigation Measure BIO-6 should be implemented for areas with potential CBB nesting and foraging habitat.

- 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?

☐ Potentially Significant Impact

☐ Less than Significant Impact

☒ Less Than Significant With Mitigation Incorporated ☐ No Impact

Discussion/Explanation:

Less than Significant with Mitigation Incorporated: Based on an analysis of the County's GIS records, the County's Comprehensive Matrix of Sensitive Species, and a Biological Resource Letter Report dated March 9, 2022, prepared by ECORP Consulting, it has been determined that the project site contains disturbed coastal sage scrub within the project boundaries. MM BIO-1 has been incorporated regarding the coastal sage scrub as described in Section IV. Biological Resources, a). Implementation of MM BIO-1 would ensure the project is conducted in compliance with all local, regional, state, and federal policies and regulations related to biological resources. Therefore, project impacts to any riparian habitat or sensitive natural community identified in the County of San Diego Multiple Species Conservation Program, County of San Diego Resource Protection Ordinance, Natural Community Conservation Plan, Fish and Wildlife Code, Endangered Species Act, Clean Water Act, or any other local or regional plans, policies, or regulations, are considered less than significant with mitigation incorporated.

- 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?

☐ Potentially Significant Impact ☐ Less than Significant Impact
☐ Less Than Significant With Mitigation Incorporated ☒ No Impact

Discussion/Explanation:

No Impact: Based on an analysis of the County's GIS records, the County's Comprehensive Matrix of Sensitive Species, and a Biological Resource Letter Report dated March 9, 2022, prepared by ECORP Consulting, it has been determined that the proposed project site does not contain any wetlands as defined by Section 404 of the Clean Water Act, including, but not limited to, marsh, vernal pool, stream, lake, river or water of the U.S., that could potentially be impacted through direct removal, filling, hydrological interruption, diversion or obstruction by the proposed development. Therefore, no impacts would occur to wetlands defined by Section 404 of the Clean Water Act and under the jurisdiction of the Army Corps of Engineers.

- 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?

☐ Potentially Significant Impact ☒ Less than Significant Impact
☐ Less Than Significant With Mitigation Incorporated ☐ No Impact

Discussion/Explanation:

Less than Significant Impact: Based on an analysis of the County's GIS records, the County's Comprehensive Matrix of Sensitive Species, and a Biological Resource Letter Report dated March 9, 2022, prepared by ECORP Consulting, it has been determined that the site has limited biological value, and existing fencing and human activity onsite constrains wildlife movement on the project site. As such, the proposed project would not be expected to impede the movement of any native resident or migratory fish or wildlife species, the use of an established native resident or migratory wildlife corridors, and the use of native wildlife nursery sites. The natural canyon to the northeast provides more suitable cover for movement. Therefore, impacts are less than significant.

- 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?

Potentially Significant Impact	<input checked="" type="checkbox"/>	Less than Significant Impact
Less Than Significant With Mitigation Incorporated	<input type="checkbox"/>	No Impact

Discussion/Explanation:

Less Than Significant Impact: Refer to the attached Ordinance Compliance Checklist dated August 4, 2022 for further information on consistency with any adopted Habitat Conservation Plan, Natural Communities Conservation Plan, other approved local, regional or state habitat conservation plan, including, Habitat Management Plans (HMP), Special Area Management Plans (SAMP), or any other local policies or ordinances that protect biological resources including the Multiple Species Conservation Program (MSCP), Biological Mitigation Ordinance, Resource Protection Ordinance (RPO), Habitat Loss Permit (HLP). As described therein, the proposed project would be conducted in compliance with all local, regional, state, and federal policies and regulations related to biological resources. Therefore, impacts would be less than significant.

V. CULTURAL RESOURCES -- Would the project:

- a) Cause a substantial adverse change in the significance of a historical resource pursuant to 15064.5?

<input type="checkbox"/> Potentially Significant Impact	<input type="checkbox"/> Less than Significant Impact
<input type="checkbox"/> Less Than Significant With Mitigation Incorporated	<input checked="" type="checkbox"/> No Impact

Discussion/Explanation:

No Impact: Based on an analysis of County of San Diego archaeology resource files, historic records, maps, and aerial photographs by County of San Diego Senior Adjunct Archaeologist, Donna Beddow, it has been determined that the project site does not contain any historical resources. Therefore, the project would not result in impacts to historical resources.

- b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to 15064.5?

- | | |
|--|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input checked="" type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less Than Significant With Mitigation Incorporated: Grading activities have taken place without permit. The project site was not previously surveyed; therefore, it is unknown if archaeological resources were present. A cultural impact fee is required for the potential impact to archaeological resources. The fee was paid and was divided between the consulting tribes (Pala, Rincon, and San Luis Rey). Because additional grading is proposed, a Treatment Agreement and Preservation Plan shall be implemented. In addition, an Archaeological and Tribal Monitoring Program will be required for the proposed additional grading as outlined below.

MM CUL-1. Archaeological and Tribal Monitoring Program

- Pre-Construction
 - Contract with a County-approved archaeologist (Project Archaeologist) to perform archaeological monitoring and a potential data recovery program during all earth-disturbing activities. The Project Archaeologist shall perform the monitoring duties before, during, and after construction.
 - Provide evidence that a Native American of an affiliated tribe has been contracted by the property owner or their representative to perform Native American Monitoring for the project.
 - Pre-construction meeting to be attended by the Project Archaeologist and Native American monitor of an affiliated tribe to explain the monitoring requirements.
- Construction
 - Monitoring. Both the Project Archaeologist and Native American monitor of an affiliated tribe are to be onsite during earth-disturbing activities. The frequency and location of monitoring of native soils and the cutting of previously disturbed deposits will be determined by the Project Archaeologist in consultation with the Native American monitor of an affiliated tribe. Both the Project Archaeologist and Native American monitor of an affiliated tribe will evaluate fill soils to ensure that they are negative for cultural resources.
 - Inadvertent Discoveries of Native American Resources. In the event that previously unidentified potentially significant cultural resources are discovered:
 - The Project Archaeologist or Native American monitor of an affiliated tribe have the authority to divert or temporarily halt ground disturbance operations in the area of the discovery to allow evaluation of potentially significant cultural resources.
 - At the time of discovery, the Project Archaeologist shall contact the County Archaeologist and culturally-affiliated tribes as identified in the Treatment Agreement and Preservation Plan.

- All ground disturbance activities within 100 feet of the discovered cultural resources shall be halted until a meeting is convened between the developer, the Project Archaeologist, tribal monitor(s), and the tribal representative(s) to discuss the significance of the find. Optionally, the County Archaeologist may attend the meeting to discuss the significance of the find.
- Construction activities shall not resume in the area of discovery until an agreement has been reached by all parties as to appropriate mitigation. Work shall be allowed to continue outside of the buffer area and shall be monitored.
- Isolates and clearly non-significant deposits shall be minimally documented in the field. The isolates and/or non-significant deposits shall be reburied onsite as identified in the Treatment Agreement and Preservation Plan.
- Treatment and avoidance of the newly discovered resources shall be consistent with the Treatment Agreement and Preservation Plan entered into with the culturally-affiliated tribes. This may include avoidance of the cultural resources through project design, in-place preservation of cultural resources located in native soils and/or reburial on the project property so they are not subject to further disturbance in perpetuity.
- If cultural resources are identified, one or more of the following treatments, in order of preference, shall be employed:
 - ❖ Preservation in place of the Cultural Resources, if feasible. Preservation in place means avoiding the resources, leaving them in place where they were found with no development affecting the integrity of the resources.
 - ❖ Reburial of the resources on the project property. The measures for reburial shall include, at least, the following:
 - Measures and provisions to protect the future reburial area from any impacts in perpetuity.
 - Reburial shall not occur until all legally required cataloging and basic recordation have been completed, with the exception that sacred items, burial goods, and Native American human remains are excluded.
 - Any reburial process shall be culturally appropriate.
 - Listing of contents and location of the reburial shall be included in the confidential appendix of the Monitoring Report.
 - The Monitoring Report shall be filed with the County under a confidential cover and is not subject to Public Records requests.
 - ❖ If preservation in place or reburial is not feasible, a Research Design and Data Recovery Program (Program) shall be prepared by the Project Archaeologist in consultation with the consulting tribes, and the Native American monitor of an affiliated tribe and approved by the County Archaeologist prior to implementation. There shall be no destructive or invasive testing on sacred items, burial goods, and Native American human remains. Results concerning finds of any inadvertent discoveries shall be included in the Monitoring Report.
- Inadvertent Discoveries of Historic Resources (Non-Native American). In the event that previously unidentified potentially significant historic resources are discovered:
 - The Project Archaeologist or culturally-affiliated Native American monitor have the authority to divert or temporarily halt ground disturbance operations in the area of the discovery to allow evaluation of potentially significant historic resources.
 - At the time of discovery, the Project Archaeologist shall contact the County Archaeologist.

- All ground disturbance activities within 100 feet of the discovered cultural resources shall be halted until a meeting is convened between the developer and the project archaeologist, to discuss the significance of the find. Optionally, the County Archaeologist may attend the meeting to discuss the significance of the find.
- Construction activities shall not resume in the area of discovery until an agreement has been reached by all parties as to appropriate mitigation. Work shall be allowed to continue outside of the buffer area and shall be monitored.
- Isolates and clearly non-significant deposits shall be minimally documented in the field.
- If historic resources are identified, a Research Design and Data Recovery Program (Program) shall be prepared by the Project Archaeologist and approved by the County Archaeologist prior to implementation. Results concerning finds of any inadvertent discoveries shall be included in the Monitoring Report.
- Human Remains.
 - The Property Owner or their representative shall contact the County Coroner and the PDS Staff Archaeologist.
 - Upon identification of human remains, no further disturbance shall occur in the area of the find until the County Coroner has made the necessary findings as to origin. If the human remains are to be taken offsite for evaluation, they shall be accompanied by the Native American monitor of an affiliated tribe.
 - If the remains are determined to be of Native American origin, the NAHC shall immediately contact the Most Likely Descendant (MLD).
 - The immediate vicinity where the Native American human remains are located is not to be damaged or disturbed by further development activity until consultation with the MLD regarding their recommendations as required by Public Resources Code §5097.98 has been conducted.
 - The MLD may, with the permission of the landowner, or their authorized representative, inspect the site of the discovery of the Native American human remains and may recommend to the owner or the person responsible for the excavation work means for treatment or disposition, with appropriate dignity, of the human remains and any associated grave goods. The descendants shall complete their inspection and make recommendations or preferences for treatment within 48 hours of being granted access to the site.
 - Public Resources Code §5097.98, CEQA §15064.5 and Health & Safety Code §7050.5 shall be followed in the event that human remains are discovered.
- Tribal Cultural Resources.
 - If tribal cultural resources are discovered, the Project Archaeologist shall conduct consultation with culturally-affiliated tribes to determine the most appropriate mitigation. Should the two parties not be able to reach consensus, then the County Archaeologist shall consider the concerns of the culturally-affiliated tribe and the Project Archaeologist, and the PDS Director shall make a final decision regarding appropriate mitigation.
- Fill Soils.
 - The Project Archaeologist and Native American monitor of an affiliated tribe shall evaluate fill soils to determine that they are clean of cultural resources.

- Monthly Reporting.
 - The Project Archaeologist shall submit monthly status reports to the Director of PDS starting from the date of the Notice to Proceed to termination of implementation of the Archaeological and Tribal Monitoring Program . The report shall briefly summarize all activities during the period and the status of progress on overall plan implementation. Upon completion of the implementation phase, a final report shall be submitted describing the plan compliance procedures and site conditions before and after construction.
- Rough Grading
 - Monitoring Report. Upon completion of Rough Grading, a monitoring report shall be prepared identifying whether resources were encountered. A copy of the monitoring report shall be provided to the South Coastal Information Center and any culturally-affiliated tribe who requests a copy. Archaeological monitoring logs showing the date and time that the monitor was onsite and any comments from the Native American monitor of an affiliated tribe must be included in the Monitoring Report.
- Final Grading
 - Final Report. A final report shall be prepared substantiating that earth-disturbing activities are completed and whether cultural resources were encountered. A copy of the final report shall be submitted to the South Coastal Information Center, and any culturally-affiliated tribe who requests a copy.
 - Cultural Material Conveyance.
 - Evidence that all Native American cultural materials in order of preference have been conveyed as follows:
 - (1) Evidence that all Native American materials collected during the archaeological and tribal monitoring program have been avoided and preserved on site.
 - (2) Evidence that all Native American materials collected have been reburied on site and preserved.
 - or
 - (3) Evidence that all Native American materials collected during the Archaeological and Tribal Monitoring Program have been repatriated to a Native American group of appropriate tribal affinity. Evidence shall be in the form of a letter from the Native American tribe to whom the Native American resources have been repatriated identifying that the cultural materials have been received.
 - Evidence that all historic materials (non-Native American) have been conveyed as follows:

Historic materials shall be curated at a San Diego curation facility and shall not be curated at a Tribal curation facility or repatriated. The collections and associated

records, including title, shall be transferred to the San Diego curation facility and shall be accompanied by payment of the fees necessary for permanent curation. Evidence shall be in the form of a letter from the curation facility stating that the historic materials have been received and that all fees have been paid.

c) Disturb any human remains, including those interred outside of dedicated cemeteries?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less Than Significant Impact: Based on an analysis of County of San Diego archaeology resource files, archaeological records, maps, and aerial photographs, it has been determined that the project would not disturb any human remains because the project site does not include a formal cemetery or any archaeological resources that might contain interred human remains. Therefore, no significant impact to human remains would occur.

VI. ENERGY -- 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"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less than Significant Impact: The project applicant has an open code violation case with the County of San Diego, and the grading permit is considered a necessary permit to remedy the code violation case by stabilizing the slope and removing the unpermitted structures. The project would result in the use of energy resources during the grading phase. During grading, the project would require the use of heavy construction equipment that would be fueled by gas and diesel. However, the energy use would be temporary (approximately 9 to 12 weeks of work), limited, and cease upon completion of grading activities, and no offsite import or export of soil material is required. Construction would be conducted in compliance with local, state, and federal regulations (e.g., USEPA and the California Air Resources Board [CARB] engine emission standards, which require highly efficient combustion systems that maximize fuel efficiency and reduce unnecessary fuel consumption, and limitations on engine idling times, etc.). Compliance with these regulations would minimize short-term energy demand during the project's grading to the extent feasible. In addition, the project does not include any permanent components that would increase operational demand for existing sources of energy. Energy needs for the project grading would be temporary and are not anticipated to require additional capacity or substantially increase peak or base period demands for electricity and other forms of energy. Therefore, no significant impact to energy resources would result.

b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less than Significant Impact: Relevant plans that pertain to the efficient use of energy include the 2019 California Energy Efficiency Action Plan, which focuses on energy efficiency. As noted, grading activities would be conducted in compliance with local, state, and federal regulations (e.g., USEPA and CARB engine emissions standards, limitations on engine idling times, etc.). Compliance with these regulations would reduce short-term energy demand during the project's grading to the extent feasible and increase the project's energy efficiency. In addition, the project does not include any permanent components that would increase operational demand for existing sources of energy. Therefore, the project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. Project impacts would be less than significant.

VII. GEOLOGY AND SOILS -- Would the project:

- a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:
- i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation: The following technical studies have been prepared for the project:

- Geotechnical Investigation prepared by Geocon Inc., dated July 16, 2019 (Appendix C).
- Standard Storm Water Quality Management Plan (SWQMP) prepared by Fuscoe Engineering, Inc., dated March 17, 2022 (Appendix D).
- Drainage Study prepared by Fuscoe Engineering, Inc., dated January 2020 (Appendix E).
- Hydrology Memorandum, San Luis Rey Training Center Grading Plan prepared by Fuscoe Engineering, Inc., dated January 31, 2020 (Appendix F).
- Storm Water Pollution Prevention Plan (SWPPP) prepared by Fuscoe Engineering, Inc., dated August 7, 2020 (Appendix G).

The following responses have incorporated the analyses from these studies.

Less than Significant Impact: The project site is not located in a fault rupture hazard zone identified by the Alquist-Priolo Earthquake Fault Zoning Act, Special Publication 42, Revised 2007, Fault-Rupture Hazards Zones in California, or located within any other area with substantial evidence of a known fault. The closest fault to the site is an unnamed pre-quaternary (i.e., active more than 1.6 million years ago) fault, approximately 5 miles northeast. This fault is not considered to present a significant fault rupture hazard in the project area. The closest known active faults to the site are the Elsinore and Newport-Inglewood Faults, located approximately 12 miles east and 16 miles west of the site, respectively. To ensure the structural integrity of the slope, a Grading Plan and Geotechnical Investigation were prepared with site grading recommendations, including removal of the undocumented fill or loose colluvium exposed within the grading limits and replaced by compacted fill in layers. All earthwork would be verified in the field by County Engineers and a licensed or registered civil engineer in the State of California. In addition, no structures are proposed as part of the project and the proposed project would not change existing operations at the San Luis Rey Training Center. Therefore, the potential for surface fault rupture at the project site to potentially cause a substantial adverse effect is considered to be low, and impacts would be less than significant.

ii. Strong seismic ground shaking?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less than Significant Impact: The project does not propose any structures but would remedy a grading code violation case. To ensure the structural integrity of the site slopes, a Grading Plan and a Geotechnical Investigation have been prepared by a registered Civil Engineer and reviewed for approval by County Engineers. The project grading must conform to the grading requirements outlined in the County Grading, Clearing, and Watercourses Ordinance (Grading Ordinance) and be verified in the field by a licensed or registered Civil Engineer and inspected by County Grading Inspectors. Therefore, the Grading Plan and the Geotechnical Investigation prepared by the registered Civil Engineer and compliance with the Grading Ordinance, ensures the project would not result in a potentially significant impact from the exposure of people or structures to potential adverse effects from strong seismic ground shaking.

iii. Seismic-related ground failure, including liquefaction?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less than Significant Impact: Liquefaction typically occurs when a site is located in a zone with seismic activity, onsite soils are cohesionless (such as sand or gravel), groundwater is encountered within 50 feet of the surface, and soil relative densities are less than about 70 percent. Portions of the project site, including the southern portion near Camino Del Rey, are

located within a "Potential Liquefaction Area" per the County GIS as identified in the County Guidelines for Determining Significance for Geologic Hazards (Geologic Hazards Guidelines). This indicates that portions of the site have liquefaction potential. However, the majority of grading is located outside of the areas identified as "Potential Liquefaction Area". In addition, the Geotechnical Investigation found the potential for liquefaction and seismically induced settlement occurring within the site soils is considered to be "very low" due to the geologic conditions encountered, remedial grading recommended, and the depth of groundwater. According to the County's GIS and the Geotechnical Investigation, the project site is underlain by dense granitic rock. The project would remove existing temporary structures onsite and does not propose any permanent structures. Therefore, there would be a less than significant impact from the exposure of people or structures to adverse effects from a known area susceptible to ground failure, including liquefaction.

iv. Landslides?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less than Significant Impact: The project site is not within a "Landslide Susceptibility Area" as identified in the County Geologic Hazards Guidelines. Landslide Susceptibility Areas were developed based on landslide risk profiles included in the San Diego County Multi-Jurisdictional Hazard Mitigation Plan (MJHMP) (URS 2004). Landslide risk areas from the MJHMP were based on data including steep slopes (greater than 25 percent); soil series data (SANDAG based on U.S. Geologic Survey [USGS] 1970s series); soil-slip susceptibility from USGS; and Landslide Hazard Zone Maps (limited to the western portion of the County) developed by the California Department of Conservation, Division of Mines and Geology (DMG). Also included within Landslide Susceptibility Areas are gabbroic soils on slopes steeper than 15 percent in grade because these soils are slide prone. The Geotechnical Investigation also found no evidence of ancient landslide deposits encountered onsite. Because the project is not located within an identified Landslide Susceptibility Area and has no evidence of ancient landslide deposits, the project would have a less than significant impact from the exposure of people or structures to potential adverse effects from landslides.

b) Result in substantial soil erosion or the loss of topsoil?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less than Significant Impact: According to the Geotechnical Investigation, the soils on the project site are the following: Ramona Sandy Loam, 5 to 9 percent slopes; Ramona Sandy Loam, 9 to 15 percent slopes, eroded; Ramona gravelly sandy loam, 15 to 30 percent slopes; Fallbrook Sandy Loam, 9 to 30 percent slopes, severely eroded; RaC2 Ramona Sandy Loam, 5 to 9

percent slopes, eroded; and Steep Gullied Land. All the above the soils have a “moderate” soil erodibility rating except for Steep Gullied Land, which is “variable” as indicated by the Soil Survey for the San Diego Area, prepared by the U.S. Department of Agriculture, Soil Conservation and U.S. Forest Service, dated December 1973. Construction of the project would include site grading, which has the potential to release sediment into downstream receiving waters.

The construction contractor would be required to implement the SWPPP prepared for the project prior to grading. The SWPPP identifies site-specific BMPs to control erosion, sediment, and other potential construction-related pollutants. By keeping soil stabilized using BMPs and with effective site management minimizing soil erosion, the SWPPP specifications and guidelines demonstrate that minimal to less than significant soil erosion shall occur during project grading.

The project would not result in substantial soil erosion or the loss of topsoil for the following reasons:

- The project would not result in unprotected erodible soils.
- The project is not located in a floodplain.
- A Standard SWQMP (March 2022) have been prepared by Fuscoe Engineering, Inc. for the project, which include design measures and source control BMPs to minimize erosion.
- The project would be required to comply with the County’s Grading Ordinance [San Diego County Code of Regulations, Title 8, Zoning and Land Use Regulations, Division 7, Sections 87.414 (DRAINAGE - EROSION PREVENTION) and 87.417 (PLANTING)]. Compliance with these regulations would minimize the potential for water and wind erosion.
- A SWPPP (August 2020) has been prepared by Fuscoe Engineering, Inc. for the project, which provides site-specific BMPs to control erosion, sediment, and other potential construction-related pollutants.

Due to these factors, it has been found that the project would not result in substantial soil erosion or the loss of topsoil, and impacts would be less than significant.

- 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 offsite landslide, lateral spreading, subsidence, liquefaction or collapse?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less than Significant Impact: The project involves approximately 10,400 cubic yards of grading on 2.88 acres. In order to ensure that project components are adequately supported, a Geotechnical Investigation was prepared for the project. The Geotechnical Investigation determined that no soils supporting the project site are unstable or susceptible to landslide, lateral spreading, subsidence, liquefaction, or collapse. According to the Geotechnical

Investigation, liquefaction is considered "very low." The Geotechnical Investigation demonstrated that the site would be suitable for development with compliance with the Grading Ordinance. Therefore, impacts would be less than significant. For further information regarding landslides, liquefaction, and lateral spreading, refer to Section VII. Geology and Soils, a), iii) through iv) listed above.

- d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

<input type="checkbox"/> Potentially Significant Impact	<input checked="" type="checkbox"/> Less than Significant Impact
<input type="checkbox"/> Less Than Significant With Mitigation Incorporated	<input type="checkbox"/> No Impact

Discussion/Explanation:

Less than Significant Impact: The Geotechnical Investigation performed for the project found the soils encountered during the field investigation to be considered "non-expansive" as defined by 2016 California Building Code Section 1803.5.3 and based on Geocon, Inc. laboratory testing. The project would incorporate geotechnical recommendations to ensure soil stability, reducing potential impacts related to geologic units or soils to a less than significant level. As previously described, no structures are proposed as part of the project. Therefore, the project would not create a substantial risk to life or property from expansive soils, and impacts would be less than significant.

- 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"/> Potentially Significant Impact	<input type="checkbox"/> Less than Significant Impact
<input type="checkbox"/> Less Than Significant With Mitigation Incorporated	<input checked="" type="checkbox"/> No Impact

Discussion/Explanation:

No Impact: The project does not propose any septic tanks or alternative wastewater disposal systems because the project is limited to remedying a grading code violation case. Therefore, the project would have no impact related to the use of septic tanks or alternative wastewater disposal systems.

- f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

<input type="checkbox"/> Potentially Significant Impact	<input type="checkbox"/> Less than Significant Impact
<input checked="" type="checkbox"/> Less Than Significant With Mitigation Incorporated	<input type="checkbox"/> No Impact

Discussion/Explanation: San Diego County has a variety of geologic environments and geologic processes which generally occur in other parts of the state, country, and the world. However,

some features stand out as being unique in one way or another within the boundaries of the County.

Less Than Significant With Mitigation Incorporated: 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.

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 that potentially contain unique paleontological resources. Excavating into undisturbed ground beneath the soil horizons may cause a significant impact if unique paleontological resources are encountered. Since an impact to paleontological resources does not typically occur until the resource is disturbed, monitoring during excavation is the essential measure to mitigate potentially significant impacts to unique paleontological resources to a level below significance (MM GEO-1). The project has a low potential for containing paleontological resources and would excavate the substratum and/or bedrock below the soil horizons.

With the implementation of mitigation requirements during project grading operations, potential impacts to paleontological resources would be less than significant. Furthermore, the project would not result in a cumulative impact to paleontological resources because other projects that require grading in sensitive paleontological resource areas would be required to have the appropriate level of paleontological monitoring and resource recovery. In addition, other projects that propose any amount of significant grading would be subject to the requirements for paleontological monitoring as required pursuant to the County's Grading Ordinance. Therefore, the project would not result in a significant direct, indirect, or cumulatively significant loss of paleontological resources.

MM GEO-1 Monitoring During Grading and Excavation

A monitoring program implemented by the excavation/grading contractor will be required. Equipment operators and others involved in the excavation shall watch for fossils during the normal course of their duties. In accordance with the Grading Ordinance, if a fossil or fossil assemblage of greater than twelve inches in any dimension is encountered during excavation, all excavation operations in the area where the fossil or fossil assemblage was found shall be suspended immediately, the County shall be notified, and a Qualified Paleontologist shall be retained by the applicant to inspect the find to determine if it is significant. A Qualified Paleontologist is a person who has, to the satisfaction of the PDS Director:

- A Ph.D. or M.S. or equivalent in paleontology or closely related field (e.g., sedimentary or stratigraphic geology, evolutionary biology, etc.);
- Demonstrated knowledge of southern California paleontology and geology; and
- Documented experience in professional paleontological procedures and techniques.

If the Qualified Paleontologist determines that the fossil or fossil assemblage is significant; a mitigation program involving salvage, cleaning, and curation of the fossil(s) and documentation shall be implemented.

If no fossils or fossil assemblages of greater than 12 inches in any dimension are encountered during excavation, a "No Fossils Found" letter will be submitted to PDS identifying who conducted the monitoring and that no fossils were found.

If one or more fossils or fossil assemblages are found, the Qualified Paleontologist shall prepare a report documenting the mitigation program, including field and laboratory methodology, location and the geologic and stratigraphic setting, list(s) of collected fossils and their paleontological significance, descriptions of any analyses, conclusions, and references cited.

VIII. GREENHOUSE GAS EMISSIONS -- Would the project

- a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation: Greenhouse gas (GHG) emissions result in an increase in the earth's average surface temperature commonly referred to as global warming. This rise in global temperature is associated with long-term changes in precipitation, temperature, wind patterns, and other elements of the earth's climate system, known as climate change. These changes are now broadly attributed to GHG emissions, particularly those emissions that result from the human production and use of fossil fuels.

GHGs include carbon dioxide, methane, halocarbons, and nitrous oxide, among others. Human induced GHG emissions are a result of energy production and consumption and personal vehicle use, among other sources.

An individual project's GHG emissions would generally not result in direct impacts under CEQA, as the climate change issue is global in nature; however, an individual project could be found to contribute to a potentially significant cumulative impact. CEQA Guidelines Section 15130(f) states that an EIR shall analyze GHG emissions resulting from a proposed project when the incremental contribution of those emissions may be cumulatively considerable.

Amendments to Section 15064.4 of the CEQA Guidelines were adopted to assist lead agencies in determining the significance of the impacts of GHG emissions. Section 15064.4 specifies that a lead agency "shall make a good-faith effort, based to the extent possible on scientific and factual data, to describe, calculate or estimate the amount of greenhouse gas emissions resulting from a project." Section 15064.4 also provides lead agencies with the discretion to determine whether to assess those emissions quantitatively or to rely on a qualitative analysis or performance-based standards.

Less than Significant Impact: Per CEQA Guidelines Section 15064(h)(3), a project's incremental contribution to a cumulative impact can be found not cumulatively considerable if the project would comply with an approved plan or mitigation program that provides specific requirements that would avoid or substantially lessen the cumulative problem in the geographic area of the project. To qualify, such plans or programs must be specified in law or adopted by

the public agency with jurisdiction over the affected resources through a public review process to implement, interpret, or make specific the law enforced or administered by the public agency. Examples of such programs include a “water quality control plan, air quality attainment or maintenance plan, integrated waste management plan, habitat conservation plan, natural community conservation plans [and] plans or regulations for the reduction of GHG emissions.” Therefore, a lead agency can make a finding of “less than significant” for GHG emissions if a project complies with adopted programs, plans, policies, and/or other regulatory strategies to reduce GHG emissions.

The County of San Diego has developed a Climate Action Plan (CAP) to implement climate actions that reduce GHG emissions and establish actions to achieve a goal of net zero carbon emissions by 2045. The CAP establishes emission reduction targets of 43.6 percent emissions reductions below 2019 levels by 2030 and 85.4 percent below 2019 levels by 2045. This CAP sets GHG reduction targets and a net zero goal in alignment with the 2022 Scoping Plan. The CAP’s attainment of the County’s GHG reduction targets is the result of (1) several initiatives to be directly implemented by the County and (2) incorporating GHG-reduction features into the construction and operation of development projects (including County-initiated and privately-initiated projects).

The CAP Consistency Review Checklist establishes a two-step process that project proponents shall follow to determine if projects are consistent with the CAP and whether they may have a significant cumulative impact under the County’s adopted GHG thresholds of significance. Step 1 of the Checklist assesses a project’s consistency with the growth projections used in the CAP to estimate future GHG emissions from activities occurring in the unincorporated area and County facilities and operations. Because the CAP uses growth projections based on implementation of the adopted General Plan, the first step in determining a project’s consistency with the CAP is to demonstrate its consistency with the regional categories and land use designations of the General Plan. All projects must demonstrate consistency with existing General Plan regional categories, land use designations, and the uses and development density and intensity allowed under the Zoning Ordinance.

Step 2 of the Checklist sets forth CAP measures and actions in the form of “consistency requirements” that project proponents are required to incorporate into their projects to demonstrate compliance with the CAP. Project proponents are required to demonstrate project consistency with the CAP consistency requirements or demonstrate why the requirements are not applicable to their project.

Projects that are consistent with the CAP, as determined using Steps 1 and 2 in this Checklist, may rely on the CAP for the cumulative impacts analysis of GHG emissions under CEQA. Projects that are not consistent with the CAP as determined by Steps 1 or 2 of the Checklist, shall not use the CAP Consistency Checklist for CEQA streamlining.

The grading activities associated with the proposed project are consistent with the existing land use designation and zoning of the property. The A70 and A72 land use regulations allow for residences and agricultural use types. The portion of the project site located within the PDP has an animal designator of “X”, which allows for horse stables and associated equestrian uses by-right. The portion of the project site located outside of the boundary of the PDP has an animal designator of an “L”, which allows for horse stables with an additional Zoning Verification or

discretionary permit, dependent upon the number of horses and land acreage. The project site has historically been either used or owned by the San Luis Rey Training Center. Given the project would be consistent with the zoning and allowed uses on the San Luis Rey Training Center property, it can be assumed that limited grading activities were assumed for the property in the General Plan and in the PDP. Additionally, because the project would be consistent with the zoning and allowed uses on the San Luis Rey Training Center property, a CAP Consistency Checklist was prepared for the project (Appendix H). The CAP Consistency Checklist demonstrates project consistency with the CAP consistency requirements or why some requirements are not applicable to the project.

Further, the project would grade 2.88 acres to remedy an existing code violation case through a Major Grading Permit and would permit an access road. The project requires minimal work (9 to 12 weeks), with no import or export of material required. Therefore, the project would produce minimal GHG emissions during grading activities. For example, the CalEEMod air quality modeling conducted for the project determined that the project is estimated to generate a total of 69.25 metric tons (MT) of carbon dioxide equivalent (CO₂e) during grading activities, which represents a minimal amount of GHG emissions comparative to standard construction projects. For example, construction of 50 residences is equated to generate approximately 900 MT CO₂e. Operationally, the project would not produce any additional emissions beyond existing conditions.

As described above, a CAP Consistency Checklist was prepared for the project that demonstrates project consistency with the CAP consistency requirements or why some requirements are not applicable to the project. Additionally, due to the project size and the short-term, temporary emissions that would occur from grading operations to remedy the code violation case, the project would not be expected to result in a substantial contribution of GHG emissions to global climate change. Therefore, impacts are less than significant.

b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less than Significant Impact: In June 2005, the Governor of California signed Executive Order (EO) S-3-05. EO S-3-05 established the following statewide goals: GHG emissions should be reduced to 2000 levels by 2010, GHG emissions should be reduced to 1990 levels by 2020, and GHG emissions should be reduced to 80 percent below 1990 levels by 2050.

In 2006, the state passed the Global Warming Solutions Act of 2006, commonly referred to as Assembly Bill (AB) 32, which set the GHG emissions reduction goal for the State of California into law. The law requires that by 2020, state emissions must be reduced to 1990 levels by reducing GHG emissions from significant sources via regulation, market mechanisms, and other actions.

SB 32 (enacted in 2016) set a new statewide GHG reduction target. More specifically, SB 32 codified a 2030 emissions reduction target that requires CARB to ensure that statewide GHG emissions are reduced to 40 percent below 1990 levels by 2030.

EO B-55-18 (September 2018) establishes a new statewide goal “to achieve carbon neutrality as soon as possible, and no later than 2045, and achieve and maintain net negative emissions thereafter.” This executive order directs CARB to “work with relevant state agencies to ensure future Scoping Plans identify and recommend measures to achieve the carbon neutrality goal.”

SB 375, passed in 2008, links transportation and land use planning with global warming. It requires CARB to set regional targets for the purpose of reducing GHG emissions from passenger vehicles. Under this law, if regions develop integrated land use, housing, and transportation plans that meet SB 375 targets, new projects in these regions can be relieved of certain review requirements under CEQA. SANDAG has prepared a Sustainable Communities Strategy for its Regional Transportation Plan, which are elements of the San Diego Forward: The Regional Plan. The strategy identifies how regional GHG reduction targets, as established by CARB, would be achieved through development patterns, transportation infrastructure investments, and/or transportation measures or policies that are determined to be feasible.

In September 2022, Governor Newsom signed AB 1279, which codifies a statewide target to achieve carbon neutrality by no later than 2045.

The project is consistent with the County’s General Plan land use designation of Semi-Rural 2 (SR-2), Limited Agriculture (A70), and General Agriculture (A72). Through its goals, policies, and land use designations, the County’s General Plan aims to reduce Countywide GHG emissions. The project is in accordance with relevant COS (Community Open Space)-14 Sustainable Land Development policies (COS-14.10 Use of low-emission construction vehicles for construction; COS-14.11 Native Vegetation will be replanted with similar genetic vegetative stock at a 3:1 ratio unless otherwise stated). These policies provide direction for individual development projects to reduce GHG emissions and help the County meet its GHG emission reduction targets. Furthermore, the project does not fall within an area where primary opportunities to reduce air quality pollutants and GHG emissions are in effect such as urbanized areas of the County where there are land use patterns that can best support the increased use of transit and pedestrian activities since most GHGs and air pollutants result from mobile source emissions (San Diego County General Plan, Conservation and Open Space Element). The project would result in a less than significant impact from VMT. Therefore, the project would not conflict with SANDAG’s recently adopted San Diego Forward: the 2021 Regional Plan, which includes a Sustainable Communities Strategy (SCS) as required by SB 375. Because the project’s proposed land uses are consistent with the County’s General Plan land use designation, the project would not conflict with the General Plan or SANDAG’s Regional Plan and would not result in growth beyond what was assumed in the regional growth forecasts.

The project’s consistency with the policies discussed above would assist in meeting the County’s contribution to GHG emissions reduction targets in California. As such, the project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions. Thus, the project would have a less than significant impact.

IX. 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"/> Potentially Significant Impact	<input checked="" type="checkbox"/> Less than Significant Impact
<input type="checkbox"/> Less Than Significant With Mitigation Incorporated	<input type="checkbox"/> No Impact

Discussion/Explanation:

Less than Significant Impact: Project grading would involve the transport of gasoline and other petroleum-based products associated with construction equipment. These materials are considered hazardous as they could cause temporary localized soil and water contamination. Incidents of spills or other localized contamination could occur during refueling, operation of machinery, undetected fluid leaks, or mechanical failure. However, all storage, handling, and disposal of these materials are regulated by California Department of Toxic Substances Control (DTSC), the USEPA, and the North County Fire Protection Department. All construction activities involving the transportation, usage, and disposal of hazardous materials would be subject to all applicable federal, state, and local requirements, which would reduce impacts associated with the use and handling of hazardous materials during construction to less than significant. The project would not involve additional operational components from existing site conditions. Therefore, the project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials, and impacts would be less than significant.

- 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"/> Potentially Significant Impact	<input type="checkbox"/> Less than Significant Impact
<input type="checkbox"/> Less Than Significant With Mitigation Incorporated	<input checked="" type="checkbox"/> No Impact

Discussion/Explanation:

No Impact: There are no schools located within 0.25-mile of the project site. The closest school to the project site is Bonsall Elementary, approximately 0.9 mile away. Further, the transport and handling of minor amounts of hazardous materials during construction would comply with all applicable federal, state, and local regulations that control hazardous material handling. Therefore, the project would not have any effect on an existing or proposed school.

- 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"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: According to the database search of Envirostor and Geotracker, the project site is not identified as a hazardous materials site (DTSC 2018; State Water Resources Control Board 2018). Thus, the project site is not identified as being a listed hazardous materials site and is not located adjacent to an active listed hazardous site. Therefore, the project would not create a significant hazard to the public or environment, and no impact would occur.

- 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 or excessive noise for people residing or working in the project area?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less than Significant Impact: The project is located within Airport Influence Area 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. Therefore, the project would not constitute a safety hazard for people residing or working in the project area, and impacts would be less than significant.

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

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation: The following sections summarize the project's consistency with applicable emergency response plans or emergency evacuation plans.

- i. SAN DIEGO COUNTY OPERATIONAL AREA EMERGENCY PLAN AND MJHMP:

Less than Significant Impact: The Operational Area Emergency Plan is a comprehensive emergency plan that defines responsibilities, establishes an emergency organization, defines lines of communications, and is designed to be part of the statewide Standardized Emergency Management System. The Operational Area Emergency Plan provides guidance for emergency planning and requires subsequent plans to be established by each jurisdiction that has

responsibilities in a disaster situation. The MJHMP includes an overview of the risk assessment process, identifies hazards present in the jurisdiction, hazard profiles, and vulnerability assessments. The plan also identifies goals, objectives, and actions for each jurisdiction in the County of San Diego, including all cities and the County unincorporated areas. The project would not interfere with either plan because it would not prohibit subsequent plans from being established or prevent the goals and objectives of existing plans from being carried out. Therefore, impacts would be less than significant.

ii. SAN DIEGO COUNTY NUCLEAR POWER STATION EMERGENCY RESPONSE PLAN

No Impact: The San Diego County Nuclear Power Station Emergency Response Plan would not be interfered with by the project due to the location of the project in relation to the power plant and the specific requirements of the plan. The emergency plan for the San Onofre Nuclear Generating Station includes an emergency planning zone within a 10-mile radius. All land area within 10 miles of the plant is not within the jurisdiction of the unincorporated County and as such a project in the unincorporated area is not expected to interfere with any response or evacuation. Therefore, no impact would occur.

iii. UNIFIED SAN DIEGO COUNTY EMERGENCY SERVICES ORGANIZATION AREA
HAZARDOUS MATERIALS PLAN: OIL SPILL CONTINGENCIES ELEMENT

No Impact: The Oil Spill Contingency Element would not be interfered with because the project is not located along the coastal zone or coastline. Therefore, no impact would occur.

iv. EMERGENCY WATER CONTINGENCIES ANNEX AND ENERGY SHORTAGE
RESPONSE PLAN

No Impact: The Emergency Water Contingencies Annex and Energy Shortage Response Plan would not be interfered with because the project does not include the alteration of a major water or energy supply infrastructure, such as the California Aqueduct. Therefore, no impact would occur.

v. DAM EVACUATION PLAN

No Impacts: The Dam Evacuation Plan would not be interfered with because no grading is proposed on the portion of the project site that is located within a dam inundation zone. In addition, no sensitive receptors, such as a hospital, day-care facility, school, etc., are proposed as part of the project. Because no structures are proposed and project grading would be located outside the Dam Inundation Zone, no impacts would occur.

f) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less than Significant Impact: The project is listed as a high fire hazard severity zone (FHSZ) area but is not located within the Wildland-Urban Interface Zone. However, the project would not construct any buildings and would only remedy a grading code violation case. The Grading Plan is required to be reviewed and approved by the County Fire Authority and as such, would comply with regulations relating to emergency access, water supply, and defensible space specified in the County Fire Code and Consolidated Fire Code. Design considerations have been incorporated into the project, including a minimum 24-foot graded road width for fire access. Based on review of the project by County staff, and through compliance with the County Fire Code and Consolidated Fire Code, impacts would be less than significant.

- g) 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"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less than Significant Impact: The project includes a Major Grading Permit consisting of the even cut and fill of approximately 10,400 cubic yards of soil on 2.88 acres to remedy a code violation case for the San Luis Rey Training Center in the unincorporated community of Bonsall. Although the existing site is an equestrian facility that supports or collects animal waste, no new activities or uses are proposed that would allow water to stand for a period of 72 hours (3 days) or more (e.g., artificial lakes, agricultural irrigation ponds). In addition, the project does not propose any residents to be placed near the equestrian facility. Therefore, the project would not substantially increase current or future resident's exposure to vectors, including mosquitoes, rats, or flies.

X. HYDROLOGY AND WATER QUALITY -- Would the project:

- a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation: The following technical studies have been prepared for the project

- Standard SWQMP prepared by Fuscoe Engineering, Inc., dated March 17, 2022 (Appendix D).
- Drainage Study prepared by Fuscoe Engineering, Inc., dated January 2020 (Appendix E).
- Hydrology Memorandum prepared by Fuscoe Engineering, Inc., dated January 31, 2020 (Appendix F).

- SWPPP prepared by Fuscoe Engineering, Inc., dated August 7, 2020 (Appendix G).

The following responses have incorporated the analyses from these studies.

Less than Significant Impact: The project would be required to obtain a National Pollutant Discharge Elimination System (NPDES) General Permit for Discharges of Storm Water Associated with Construction Activities. Minimum required construction BMPs would include vegetation stabilization planting, fiber rolls (straw wattles), stabilized construction entrance, materials management, and waste management.

In addition, a Hydrology Memorandum and Standard SWQMP have been prepared. The project proposes and would be required to implement the following site design measures and/or source control BMPs and/or permanent post-construction pollutant and hydromodification control BMPs to reduce potential pollutants to the maximum extent practicable from entering stormwater runoff: 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 project is utilizing self-mitigation drainage management areas by following the 'Self-mitigating' criteria required by the County of San Diego BMP Design Manual (2020).

The project would be consistent with requirements of the County of San Diego BMP Design Manual, which is a design manual for compliance with local County of San Diego Watershed Protection Ordinance (Sections 67.801 et seq.) and regional Municipal Separate Storm Sewer System (MS4) Permit (Regional Water Quality Control Board [RWQCB], San Diego Region Order No. R9-2013-0001 as amended by R9-2015-0001 and R9-2015-0100) requirements for stormwater management.

Further, the project would not increase the area of impervious surfaces onsite and does not propose long-term operational uses that could otherwise degrade surface or groundwater quality. Therefore, the project would have less than significant impacts on water quality standards and discharge requirements, as well as degradation of surface and groundwater quality in general.

- 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"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less than Significant Impact: The project site is located within the Bonsall Area of the San Luis Rey Hydrologic Unit in the San Diego Region. The project is tributary to already impaired waterbodies as listed on the Clean Water Act Section 303(d) list starting from Moosa Canyon Creek, San Luis Rey River (Lower), and eventually to the Pacific Ocean Shoreline.

The Standard SWQMP prepared for the project includes the following design measures and source control BMPs such that potential pollutants would be reduced to the maximum extent practicable so as not to increase the level of pollutants in receiving waters and reduce impacts on stormwater quality and hydromodification to less than significant levels: vegetation stabilization planting, fiber rolls (straw wattles), stabilized construction entrance, materials and waste management, permeable surfaces, and biofiltration basins.

The proposed BMPs are consistent with the regional surface water and stormwater planning and permitting process that has been established to improve the overall water quality in County watersheds. As a result, the project would not contribute to a cumulative impact to an already impaired water body, as listed on the Clean Water Act Section 303(d).

Regional surface water and stormwater permitting regulation for County of San Diego includes the following: RWQCB, San Diego Region Order No. R9-2013-0001 as amended by R9-2015-0001 and R9-2015-0100, San Diego Watershed Protection Ordinance (Sections 67.801 et seq.), and the County of San Diego BMP Design Manual. The stated purposes of these ordinances are to protect the health, safety, and general welfare of the County of San Diego residents; to protect water resources and to improve water quality; to ensure the use of management practices by the County and its citizens that will reduce the adverse effects of polluted runoff discharges on waters of the state; to secure benefits from the use of stormwater as a resource; and to ensure the County is compliant with applicable state and federal laws. The Watershed Protection Ordinance has discharge prohibitions and requirements that vary depending on type of land use activity and location in the County. The project would be subject to the Watershed Protection Ordinance, which would require the preparation of a Stormwater Management Plan that details the project's pollutant discharge contribution to a given watershed and proposes BMPs or design measures to mitigate any impacts that may occur in the watershed. Therefore, impacts would be less than significant.

- 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"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
|---|--|

☐ Less Than Significant With Mitigation Incorporated ☐ No Impact

Discussion/Explanation:

Less than Significant Impact: The RWQCB has designated water quality objectives for waters of the San Diego Region to protect the existing and potential beneficial uses of each hydrologic unit. The project lies in the Bonsall 903.12, Hydrologic Area of the San Luis Rey Hydrologic Unit that has the following existing and potential beneficial uses for groundwater: municipal and domestic supply; agricultural supply; industrial process supply, and industrial service supply.

Potential sources of polluted runoff resulting from the project are discussed in the Standard SWQMP prepared for the project. The following site design measures and/or source control BMPs and/or permanent post construction pollutant and hydromodification control BMPs would be employed to reduce potential pollutants in runoff to the maximum extent practicable, such that the project would not cause or contribute to an exceedance of applicable surface or groundwater receiving water quality objectives or degradation of beneficial uses: use of native, non-invasive drought tolerant species not requiring fertilizers and pesticides, disturbed soils that would be amended and aerated to promote water retention equivalent to undisturbed native topsoil.

In addition, the proposed BMPs are consistent with regional surface water, stormwater and groundwater planning and permitting process that has been established to improve the overall water quality in County watersheds. As a result, the project would not contribute to an exceedance of applicable surface or groundwater receiving water quality objectives or degradation of beneficial uses. Refer to Section X. Hydrology and Water Quality, b), for more information on regional surface water and stormwater planning and permitting process.

- d) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

☐ Potentially Significant Impact ☒ Less than Significant Impact
☐ Less Than Significant With Mitigation Incorporated ☐ No Impact

Discussion/Explanation:

Less than Significant Impact: The project site obtains its water supply from the Rainbow Public Water Utility District. The project would not require additional restroom facilities or associated use of additional potable water due to the project remedying a code violation case with no proposed structures. Limited water would be required during the construction phase and obtained from the Rainbow Municipal Water Utility District. No groundwater would be used for any purposes during construction or operation phases of the project. In addition, no new impervious surfaces are proposed that would interfere with groundwater recharge. The project would not involve regional diversion of water to another groundwater basin, or diversion or channelization of a stream course or waterway with impervious layers, such as concrete lining

or culverts, for substantial distances (e.g., 0.25-mile). Therefore, impacts would be less than significant.

- e) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or through the addition of impervious surface, in a manner which would:
- (i) result in substantial erosion or siltration on- or offsite;

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less than Significant Impact: As outlined in the Standard SWQMP prepared for the project, the project would implement the following site design measures, source control, and/or permanent post construction pollutant and hydromodification control BMPs to reduce potential pollutants, including sediment from erosion or siltation, from entering stormwater runoff to the maximum extent practicable: permeable surfaces and biofiltration basins. Runoff would be directed to the biofiltration basins at the northern end of the facility and along the access driveway. These measures would control erosion and sedimentation and satisfy waste discharge requirements as required by the Land-Use Planning for New Development and Redevelopment Component of the San Diego MS4 Permit (SDRWQCB Order No. R9-2013-0001), as implemented by the San Diego County Jurisdictional Runoff Management Program and BMP Design Manual. The Standard SWQMP specifies and describes the implementation process of all BMPs that would address equipment operation and materials management, prevent the erosion process from occurring, and prevent sedimentation. The Department of Public Works would ensure that the Standard SWQMP is implemented as proposed. Due to these factors, the project would not result in significantly increased erosion or sedimentation potential and impacts would be less than significant. For further information on soil erosion, refer to Section VII. Geology and Soils, b).

- (ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less than Significant Impact: The Hydrology Memorandum prepared for the project analyzes drainage before and after proposed development of the project site, including BMPs required to control runoff rate and quality to ensure that no adverse effects would occur to downgradient neighboring properties, consistent with the County's Hydrology Manual, Hydraulic Design Manual, and BMP Design Manual. The Hydrology Memorandum determined that the proposed grading would:

- not increase runoff at peak runoff flows, onsite and offsite;
- maintain drainage patterns at or below pre-developed flow volume and velocity; and
- retain and treat the 85th percentile storm runoff volume through amended soil and landscaping.

Furthermore, since the project site is not currently prone to flooding and future site grading would not substantially alter the drainage patterns, the project site would not be prone to onsite flooding under design peak flow conditions. Therefore, the project would not substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite. Impacts would be less than significant.

(iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less than Significant Impact: As discussed above in Section X. Hydrology and Water Quality, e(ii), the project would not result in increased peak runoff flows and would retain and treat the 85th percentile storm runoff volume. Therefore, the project would not create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. Impacts would be less than significant.

(iv) impede or redirect flood flows?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less than Significant Impact: As discussed above in Section X. Hydrology and Water Quality, e(ii), runoff would maintain flow at or below pre-development values. Flows would be controlled at the points where existing runoff leaves the property. Therefore, the project would not impede or redirect flows. Impacts would be less than significant.

f) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less Than Significant Impact: The southern portion of the project site is located within a Dam Inundation Zone but is limited to the first 80 feet of the project site from Camino Del Rey, where no grading is proposed. In addition, the project would remedy a code violation case and no permanent or habitable structures are proposed. The project site is also not located within Federal Emergency Management Agency (FEMA), County Floodplain, or County Floodway flood zones, or located within a tsunami or seiche inundation zone. Therefore, impacts would be less than significant.

g) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less than Significant Impact: The project site would be in compliance with the San Diego Basin Water Quality Control Plan and is not located within a County Sustainable Groundwater Management Act or Groundwater Sustainability Plan basin area. See responses X. Hydrology and Water Quality, a) through d). Therefore, the project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. Impacts would be less than significant.

XI. LAND USE AND PLANNING -- Would the project:

a) Physically divide an established community?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less than Significant Impact: The owner of the project site, Los Angeles Turf Club, owns 12 parcels totaling 204 acres that are governed by the San Luis Rey Downs PDP, adopted in November 1977. A portion of the project site is located within the PDP, while the other portion is located outside the PDP, but is owned by the Los Angeles Turf Club. The project would remedy a grading code violation case through a grading permit by stabilizing existing onsite slopes and permitting the onsite access from Camino Del Rey. The project does not propose the introduction of new major infrastructure such as roadways, water supply systems, or utilities to the area. In addition, no new development is proposed that would have the potential to physically divide an established community. Therefore, the project is consistent with the use regulations in place and would not significantly disrupt or physically divide an established community. Impacts would be less than significant.

- b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less than Significant Impact: The project applicant owns the San Luis Rey Training Center, which is a thoroughbred racehorse training facility located within the Bonsall Community Plan area. The facility is consistent with the Bonsall Community Plan, which prioritizes its rural character, comprising of primarily low-density residential uses, agricultural uses, and equestrian uses. The project would remedy a grading code violation case by stabilizing existing slopes and permitting the onsite access from Camino Del Rey. The violation area is currently used for site access from Camino Del Rey, as well as a borrow site, with roads, staging equipment, and temporary structures, which the latter would be removed. The borrow site has resulted from years placing material under the horse mats located within the horse stalls, when needed. According to the County Zoning Ordinance, borrow sites do not require a permit if less than 200 cubic yards of material is removed. Due to the applicant's description of only removing a bucket-worth of soil at a time, which is much less than 200 cubic yards of soil removal, no permit is required for the borrow site. The applicant does not propose any new structures or new use types. The project does not conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, impacts would be less than significant.

XII. 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"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less than Significant Impact: The project site has been classified by the California Department of Conservation – Division of Mines and Geology as an area of "Potential Mineral Resource Significance" (MRZ-3), but with no active mines. According to the County GIS, the southerly portion of the site is underlain with alluvial land. However, this portion of the site has been previously developed and no grading is proposed in this location. In addition, the San Luis Rey Training Center is surrounded by developed residential land uses, which would be incompatible with future extraction of mineral resources on the project site. A future mining operation at the project site would likely create a significant impact to neighboring properties for issues such as noise, air quality, traffic, and possibly other impacts. Therefore, implementation of the project would not result in the loss of availability of a known mineral resource that would be of value since the mineral resource extraction would not occur at the site due to incompatible land uses.

- 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"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: The project site is not located in an area that has Mineral Resource Zone 2 (MRZ-2) designated lands, nor is it located within 1,300 feet of such lands. Therefore, the project would not result in the loss of availability of locally important mineral resource(s). Therefore, no potentially significant loss of availability of a locally important mineral resource recovery (extraction) site delineated on a local general plan, specific plan, or other land use plan would occur as a result of this project.

XIII. NOISE -- Would the project result in:

- a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less than Significant Impact: The project includes a Major Grading Permit to remedy a grading code violation case by stabilizing onsite slopes and permitting an access road from Camino Del Rey. Proposed grading consists of the even cut and fill of 10,400 cubic yards of soil balanced onsite on approximately 2.88 acres. The project would be consistent with the County of San Diego General Plan, Noise Ordinance, and other applicable noise standards for the following reasons:

General Plan – Noise Element

The County of San Diego General Plan, Noise Element, Tables N-1 and N-2 addresses noise sensitive areas and requires an acoustical study to be prepared for any use that may expose noise sensitive areas to noise in excess of a Community Noise Equivalent Level (CNEL) of 60 decibels (dBA) for single residences (including senior housing, convalescent homes), and 65 dBA CNEL for multi-family residences (including mixed-use commercial/residential). Moreover, if the project is in excess of 60 dBA CNEL or 65 dBA CNEL, modifications must be made to the project to reduce noise levels. Noise sensitive areas include residences, hospitals, schools, libraries, or similar facilities as mentioned within Tables N-1 and N-2. Noise sensitive land uses exist adjacent (residences as close as approximately 90 feet) to the east of the project site. Project implementation would not expose existing or planned noise sensitive areas to road, airport, heliport, railroad, industrial, or other noise in excess of the outside sound level threshold

because the project consists of a grading permit requiring no import or export of material, and no structures are proposed. Therefore, the project is consistent with the General Plan – Noise Element, and impacts would be less than significant.

Noise Ordinance – Section 36.404

Non-transportation noise for the project would be sourced from the equipment used for the proposed onsite grading. Non-transportation noise generated by the project would not exceed the standards of the County of San Diego Noise Ordinance (Section 36.404) at or beyond the project's property line because the project would conform to grading equipment operation pursuant to Section 36.409. No additional use types or structures are proposed for long-term habitation. Therefore, the project is consistent with the Noise Ordinance Section 36.404 and impacts would be less than significant.

Noise Ordinance – Section 36.409 and Section 36.410

The project would not generate grading noise that may exceed the standards of the County of San Diego Noise Ordinance (Section 36.409). Construction operations would occur only during permitted hours of operation pursuant to Section 36.409. Also, given the limited nature of proposed grading, it is not anticipated that the project would operate construction equipment in excess of an average sound level of 75 dB between the hours of 7 a.m. and 7 p.m. Thus, daytime construction would not result in significant noise impacts. In addition, no impulsive noise sources, such as blasting or rock crushing, are anticipated during grading operations. Therefore, the project is consistent with the Noise Ordinance Section 36.409 and 36.410; impacts would be less than significant.

The project's conformance to the County of San Diego General Plan and County of San Diego Noise Ordinance (Section 36-404 and 36.410) ensures the project would not create cumulatively considerable noise impacts, because the project would not exceed the local noise standards for noise sensitive areas; and the project would not exceed the applicable noise level limits at the property line or construction noise limits, derived from state regulation to address human health and quality of life concerns. Therefore, the project would not contribute to a cumulatively considerable exposure of persons or generation of noise levels in excess of standards established in the local general plan, noise ordinance, and applicable standards of other agencies.

b) Generation of excessive groundborne vibration or groundborne noise levels?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less than Significant Impact: The project does not propose any of the following land uses that can be impacted by groundborne vibration or groundborne noise levels:

1. Buildings where low ambient vibration is essential for interior operation, including research and manufacturing facilities with special vibration constraints.

2. Residences and buildings where people normally sleep including hotels, hospitals, residences, and where low ambient vibration is preferred.
3. Civic and institutional land uses including schools, churches, libraries, other institutions, and quiet office where low ambient vibration is preferred.
4. Concert halls for symphonies or other special use facilities where low ambient vibration is preferred.

In addition, as discussed in Section XIII. Noise, a), no blasting or rock crushing is anticipated during grading operations. Therefore, no impulsive noise sources are expected, and the project would comply with Section 36.410 of the County Noise Ordinance. In addition, the project does not propose any major, new, or expanded infrastructure such as mass transit, highways or major roadways, or intensive extractive industry that could generate excessive groundborne vibration or groundborne noise levels. Potential for vibration and groundborne noise would be minimal and would substantially attenuate with distance such that impacts at sensitive receptors would be less than significant.

- c) For a project located within the vicinity of a private airstrip or 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"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less than Significant Impact: The project is located within Airport Influence Area 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, Avigation Easement, Overflight area or 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. Therefore, impacts would be less than significant.

XIV. POPULATION AND HOUSING -- Would the project:

- a) Induce substantial unplanned 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"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: The project would remedy a grading code violation case. The project would not induce substantial population growth in an area because the project does not propose any physical or regulatory change that would remove a restriction to or encourage population growth in an area including, but not limited to the following: new or extended infrastructure or public facilities; new commercial or industrial facilities; large scale residential development; accelerated conversion of homes to commercial or multi-family use; or regulatory changes including General Plan amendments, specific plan amendments, zone reclassifications, sewer or water annexations; or San Diego County Local Agency Formation Commission (LAFCO) annexation actions. Therefore, impacts would be less than significant.

- b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: The project would not displace any existing people or housing because the project would not demolish any habitable structures and would remedy a grading code violation case. Therefore, no impact would occur.

XV. 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 governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance service ratios, response times or other performance objectives for any of the public services:

- i. Fire protection?
- ii. Police protection?
- iii. Schools?
- iv. Parks?
- v. Other public facilities?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less than Significant Impact: The project would remedy a grading code violation case and does not support the construction of any structures, or new use types. The project would not result in the need for significantly altered public services or facilities including, but not limited to, fire protection facilities, sheriff facilities, schools, or parks in order to maintain acceptable service

ratios, response times, or other performance service ratios or objectives for any public services. Therefore, the project would not have an adverse physical effect on the environment because the project does not require new or significantly altered services or facilities to be constructed. Impacts would be less than significant.

XVI. RECREATION -- Would the project:

- a) 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"/> Potentially Significant Impact	<input type="checkbox"/> Less than Significant Impact
<input type="checkbox"/> Less Than Significant With Mitigation Incorporated	<input checked="" type="checkbox"/> No Impact

Discussion/Explanation:

No Impact: The project does not propose any residential use, included but not limited to a residential subdivision, mobile home park, or construction for a single-family residence that may increase the use of existing neighborhood and regional parks or other recreational facilities in the vicinity. Therefore, no impacts would occur from the project.

- b) 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"/> Potentially Significant Impact	<input type="checkbox"/> Less than Significant Impact
<input type="checkbox"/> Less Than Significant With Mitigation Incorporated	<input checked="" type="checkbox"/> No Impact

Discussion/Explanation:

No Impact: The project does not include recreational facilities or require the construction or expansion of recreational facilities. Therefore, no impacts would occur from the project.

XVII. TRANSPORTATION -- Would the project:

- a) Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

<input type="checkbox"/> Potentially Significant Impact	<input checked="" type="checkbox"/> Less than Significant Impact
<input type="checkbox"/> Less Than Significant With Mitigation Incorporated	<input type="checkbox"/> No Impact

Discussion/Explanation:

Less than Significant Impact: The project includes a Major Grading Permit consisting of the even cut and fill of 10,400 cubic yards of soil on approximately 2.88 acres to remedy a code violation case for the San Luis Rey Training Center in the unincorporated community of Bonsall. The project would not have a direct impact related to a conflict with any plans, ordinances, or

policies addressing the circulation system. Project trips, or average daily trips (ADTs), associated with grading is estimated to include between 8 and 44 ADT for workers depending on the construction phase. Given that construction worker trips would be temporary and would be dispersed along different routes based on the origin of the trips, construction worker commuting is not expected to have a significant effect on the capacity of the transportation system.

Operationally, the project does not involve any additional use types or structures. Once the grading activities are complete, no onsite land use changes are proposed as compared to existing conditions. The project would not conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including public 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 public transit. In addition, implementation of 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, nor would it generate sufficient travel demand to increase demand for transit, pedestrian, or bicycle facilities. Therefore, the project would not conflict with policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities.

b) Would the project conflict or be consistent with CEQA Guidelines section 15064.3, subdivision (b)?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation: Per CEQA Guidelines Section 15064.3, *Determining the Significance of Transportation Impacts*, land use projects should be evaluated based on vehicle miles traveled (VMT). In accordance with the County's Draft 2022 Transportation Study Guidelines, the requirements to prepare a detailed transportation VMT analysis apply to all land development projects, except those that meet at least one of the screening criteria. A project that meets at least one of the screening criteria below would have a less than significant VMT impact due to project characteristics and/or location:

1. Projects Located in a VMT Efficient Area
2. Projects located in Infill Village Area (in Transit Opportunity Areas and Outside of High/Very High Fire Severity Areas)
3. Small Residential and Employment Projects
4. Projects Located in a Transit Accessible Area
5. Locally Serving Retail/Service Projects
6. Locally Serving Public Facilities and Other Uses
7. Redevelopment Projects with Greater VMT Efficiency
8. Affordable Housing

The project involves grading activities only and is not a land development project; therefore, the project is not required to prepare a detailed VMT analysis, as described in further detail below.

Less than Significant Impact: As discussed above, traffic associated with project would only be during the grading phase. Operationally, the project would not produce any additional traffic or trips as compared to the existing facility and conditions. CEQA Section 15064.3, *Determining the Significance of Transportation Impacts*, states that for many projects, a qualitative analysis of construction traffic may be appropriate. Since construction traffic is temporary and workers are either travelling to the project jobsite or another jobsite elsewhere, the impact on VMT is considered less than significant. Therefore, the project would not conflict with, and is consistent with, CEQA Guidelines section 15064.3, subdivision (b). Impacts would be less than significant.

c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less than Significant Impact: The project would not substantially increase driving hazards due to a geometric design feature or incompatible uses. The project includes a Major Grading Permit to remedy a code violation case and does not propose any new use types, or structures, that would increase the site operational trips. Additional trips would be sources from grading activities, and the onsite access driveway would be used during grading activities for worker trips. The turning radius on the proposed access driveway connecting to Camino Del Rey would accommodate maneuverability of large trucks and vehicles, including grading equipment as well as fire trucks per County roadway standards, in the case of an emergency. Additionally, the project does not propose any changes to roadways, nor does it propose the construction of any new roadways and therefore, would not substantially increase hazards due to a geometric design feature or incompatible uses. Impacts would be less than significant.

d) Result in inadequate emergency access?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less than Significant Impact: The project would not generate any traffic volumes that would impede emergency access. The County Fire Authority has reviewed the proposed plans and are required to comply with the County's emergency access requirements per the San Diego County Fire Code and Consolidated Fire Code, including turning radius and maneuverability of large emergency vehicles such as fire trucks and ambulances. Therefore, the project would not result in inadequate emergency access, and impacts would be less than significant.

XVIII. TRIBAL CULTURAL RESOURCES -- Would the project:

- a) Cause a substantial adverse change in the significance of a tribal cultural resource, as defined in Public Resources Code §21074 as either a site, feature, place, or cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:
- i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of Historical Resources as defined in Public Resources Code §5020.1(k), or

- | | |
|--|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input checked="" type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Less Than Significant With Mitigation Incorporated: Grading activities have taken place at the project site without permit. The project site was not previously surveyed; therefore, it is unknown if tribal cultural resources were present. A cultural impact fee is required for the potential impact to archaeological resources. The fee shall be divided between the consulting tribes (Pala Band of Mission Indians, Rincon Band of Luiseño Indians, and San Luis Rey Band of Mission Indians). Because additional grading is proposed, a Treatment Agreement and Preservation Plan shall be implemented. In addition, an Archaeological and Tribal Monitoring Program would be required as a mitigation measure for the proposed additional grading as outlined under MM CUL-1 above. Refer to Section V. Cultural Resources, b), for a discussion of the requirements under MM CUL-1.

- ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code §5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code §5024.1, the Lead Agency shall consider the significance of the resource to a California Native American tribe.

- | | |
|--|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input checked="" type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less than Significant With Mitigation Incorporated: Pursuant to AB 52, consultation was initiated with culturally-affiliated tribes. No tribal cultural resources were identified during consultation. During future grading activities, MM CUL-1 would be required and would ensure impacts to potentially uncovered archaeological and tribal cultural resources are less than significant. Refer to Section V. Cultural Resources, b), for a discussion of the requirements under MM CUL-1.

XIX. UTILITIES AND SERVICE SYSTEMS -- Would the project:

- a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications

facilities, the construction or relocation of which could cause significant environmental effects?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: The project consists of remedying a grading code violation case and does not support the construction of any structures, or new use types, that would facilitate the need for new facilities. In addition, the project is served by the Rainbow Municipal Water District and no new or expanded water or wastewater facilities are required for the grading operations. A Standard SWQMP has been prepared for the project which would not result in the relocation or alteration of any onsite stormwater drainage facilities and the onsite water flow would discharge to the same outlet. Lastly, no natural gas or telecommunications facilities would be required. Therefore, because the project would not require the construction of new or expanded facilities that could cause significant environmental effects, no impacts would occur.

- b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less than Significant Impact: The San Luis Rey Training Center, including the project site, is owned by the Los Angeles Turf Club and is served by the Rainbow Municipal Water District. The San Luis Rey Training Center has existed since the 1970s and the use type for the equestrian center is integrated into Rainbow Municipal Water Districts current and future water projections. Minimal water would be required for the project for dust control and suppression. The grading activities and associated water use is expected to occur for approximately 9 to 12 weeks. The project would not result in any new construction or additional use types, and grading activities would be temporary. Therefore, the project would have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years.

- c) 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"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less than Significant Impact: The project site is served by the Rainbow Municipal Water District for onsite sewer facilities. The project includes a Major Grading Permit to remedy a grading code violation case, and no new structures or use types are proposed. The San Luis Rey Training Center has existed since the 1970s and the use type for the equestrian center is already integrated into Rainbow Municipal Water Districts current and future sewer projections. No new or increased wastewater treatment would be required by the grading project. Therefore, the project would not interfere with any wastewater treatment providers service capacity, and impacts would be less than significant.

- d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

<input type="checkbox"/> Potentially Significant Impact	<input checked="" type="checkbox"/> Less than Significant Impact
<input type="checkbox"/> Less Than Significant With Mitigation Incorporated	<input type="checkbox"/> No Impact

Discussion/Explanation:

Less than Significant Impact: The project includes a Major Grading Permit to remedy a grading code violation case and does not propose any new structures or use types that would result in long-term operational solid waste generation. All solid waste facilities, including landfills require solid waste facility permits to operate. In San Diego County, the County Department of Environmental Health, Local Enforcement Agency issues solid waste facility permits with concurrence from the Department of Resources Recycling and Recovery (CalRecycle) under the authority of the Public Resources Code (Sections 44001-44018) and California Code of Regulations Title 27, Division 2, Subdivision 1, Chapter 4 (Section 21440et seq.). There are four, permitted active landfills in San Diego County with remaining capacity. Therefore, there is sufficient existing permitted solid waste capacity to accommodate the project's solid waste disposal needs and the project would not impair the attainment of solid waste reduction goals, and impacts would be less than significant.

- e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

<input type="checkbox"/> Potentially Significant Impact	<input checked="" type="checkbox"/> Less than Significant Impact
<input type="checkbox"/> Less Than Significant With Mitigation Incorporated	<input type="checkbox"/> No Impact

Discussion/Explanation:

Less than Significant Impact: The project includes a Major Grading Permit to remedy a grading code violation case and does not propose any new structures or use types. All solid waste facilities, including landfills, require solid waste facility permits to operate. In San Diego County, the County Department of Environmental Health, Local Enforcement Agency, issues solid waste facility permits with concurrence from CalRecycle under the authority of the Public Resources Code (Sections 44001-44018) and California Code of Regulations Title 27, Division 2, Subdivision 1, Chapter 4 (Section 21440et seq.). The project would deposit all solid waste at a

permitted solid waste facility, and therefore, would comply with federal, state, and local statutes and regulations related to solid waste.

XX. 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"/> Potentially Significant Impact	<input checked="" type="checkbox"/> Less than Significant Impact
<input type="checkbox"/> Less Than Significant With Mitigation Incorporated	<input type="checkbox"/> No Impact

Discussion/Explanation:

Less than Significant Impact: The project would be served by the North County Fire Protection District Station 5, approximately 1.4 miles west of the project site. As described in Section IX. Hazards and Hazardous Materials, e), the project would not substantially impair an adopted emergency response plan or evacuation plan. The project would remedy a grading code violation case, and no additional use types or structures are proposed. Therefore, no additional demand beyond current conditions is required for emergency response. In addition, project access has been designed in conformance with state law and local regulations. Per North County Fire Protection District emergency vehicle requirements, the width of the project access road would total 24 feet. Therefore, the project would not substantially impair an adopted emergency response plan or emergency evacuation plan, and impacts would be less than significant.

- b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentration from a wildfire or the uncontrolled spread of a wildfire?

<input type="checkbox"/> Potentially Significant Impact	<input checked="" type="checkbox"/> Less than Significant Impact
<input type="checkbox"/> Less Than Significant With Mitigation Incorporated	<input type="checkbox"/> No Impact

Discussion/Explanation:

Less than Significant Impact: The project is listed as a high FHSZ but is not located within the Urban-Wildland Interface Zone. The majority of the County is in the high and very high FHSZ. Accordingly, the County has implemented fire safety measures depending on specific factors, such as location, vegetation, etc. The project does not propose any vegetation that would be considered flammable, and is required to meet applicable fire measures, such as fire apparatus access and access road requirements. Additionally, the project would remedy a grading code violation case and does not propose any additional uses or structures. Therefore, the project would not expose project occupants, such as residents, to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire, and impacts would be less than significant.

- 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 to the environment?

<input type="checkbox"/> Potentially Significant Impact	<input checked="" type="checkbox"/> Less than Significant Impact
<input type="checkbox"/> Less Than Significant With Mitigation Incorporated	<input type="checkbox"/> No Impact

Discussion/Explanation:

Less than Significant Impact: As discussed above, the project would remedy a grading code violation case. All infrastructure associated with the project has been incorporated within this analysis. As part of the grading permit, the existing onsite access would be improved to 24-foot width, consistent with the North County Fire Protection District emergency vehicle requirements. The improvement would aid in an emergency situation by providing an additional access point for wildfire responders, as well as provide the adequate width for the fire apparatus. In addition, the project has been designed to avoid flammable vegetation. Therefore, based on project coordination with County staff, compliance with the County Fire Code and Consolidated Fire Code, and compliance with the North County Fire Protection District's requirements, impacts associated with fire risk would be less than significant.

- d) Expose people or structure to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

<input type="checkbox"/> Potentially Significant Impact	<input checked="" type="checkbox"/> Less than Significant Impact
<input type="checkbox"/> Less Than Significant With Mitigation Incorporated	<input type="checkbox"/> No Impact

Discussion/Explanation:

Less than Significant Impact: As stated in Section X. Hydrology and Water Quality, e(ii), the Hydrology Memorandum analyzed drainage before and after proposed development of the project site, including BMPs required to control runoff rate and water quality to ensure that no adverse effects would occur to downgradient neighboring properties. The Hydrology Memorandum found that since the project site is not currently prone to flooding and future site grading would not substantially alter the drainage patterns, the project site would not be prone to onsite flooding under design peak flow conditions. In addition, the Geotechnical Investigation prepared by Geocon Inc. found no soil or geologic conditions existing on and supporting the site that are unstable, susceptible to landslide, lateral spreading, subsidence, liquefaction, or collapse. The Geotechnical Investigation also found no evidence of ancient landslide deposits encountered onsite. The investigation demonstrated that the site would be suitable for development and in compliance with the Grading Ordinance. Further, because the grading permit is to remedy a grading code violation case including stabilizing the onsite slopes, the project would incorporate geotechnical recommendations to ensure soil and slope stability. The project also does not propose any additional use types or structures. Due to the aforementioned factors, the project site would not expose people or structures to significant risks, including

downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. Impacts are less than significant.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE

- a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

- | | |
|--|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input checked="" type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Per the instructions for evaluating environmental impacts in this Initial Study, the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory were considered in the response to each question in sections IV and V of this form. In addition to project specific impacts, this evaluation considered the project's potential for significant cumulative effects. As a result of this evaluation, the project was determined to have potential significant effects related to biological resources, cultural resources, and geology and soils. However, mitigation has been included that clearly reduces these effects to a level below significance. This mitigation includes:

- Biological Resources: The applicant shall purchase 0.692 acre of Diegan coastal sage scrub at a County-approved mitigation bank and implement biological monitoring during ground disturbing activities;
- Cultural Resources: Payment of a cultural impact fee for the potential impact to archaeological resources paid to Pala, Rincon, and San Luis Rey, as well as monitoring of all ground disturbing activities by a qualified archaeologist, implemented with a Treatment Agreement and Preservation Plan; and
- Geology and Soils: Fossil recovery program required with monitoring by the excavation/grading contractor and a Qualified Paleontologist retained by the applicant shall inspect any fossil or fossil assemblage found.

As a result of this evaluation, there is no substantial evidence that, after mitigation, significant effects associated with this project would result. Therefore, this project has been determined not to meet this Mandatory Finding of Significance.

- b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
|---|---|

☒ Less Than Significant With Mitigation Incorporated ☐ No Impact

The following list of past, present, and future projects located within a 1-mile radius of the project were considered and evaluated as a part of this Initial Study:

PROJECT NAME	ADDRESS	PROJECT NUMBER	APN
Golf Green Estates	No Address	PDS2006-3100-5498 PDS2007-3500-07-011	1260607200
Moosa Creek Major Grading	No address	PDS2021-LDGRMJ-30327 PDS2021-ER-21-02-002	1260608400
Ocean Breeze Ranch	5820 Lilac Road	PDS2016-TM-5615 PDS2016-MUP-16-012 PDS2016-MUP-16-013 PDS2016-STP-16-032 PDS2016-ER-16-02-006	1271912200
Lilac Del Cielo/Fairview	5564 Camino Del Cielo	PDS2005-3100-5427 PDS2017-TM-5427TE PDS2017-ER-05-02-013B PDS2019-STP-05-026W1 PDS2020-LDGRMJ-30262	1260607700

Notes: STP (3500) – Site Plan
TM (3100) – Tentative Map
MUP (3300) – Major Use Permit
LDGRMJ – Major Grading permit
ER – Environmental Record

Per the instructions for evaluating environmental impacts in this Initial Study, the potential for adverse cumulative effects were considered in the response to each question in Sections I through XX of this form. In addition to project specific impacts, this evaluation considered the project's potential for incremental effects that are cumulatively considerable. As a result of this evaluation, there were determined to be potentially significant cumulative effects related to Biological Resources, Cultural Resources, and Geology and Soils. However, mitigation has been included that reduces these cumulative effects to a level below significance, as detailed in Section XXI. Mandatory Findings of Significance, b).

As a result of this evaluation, there is no substantial evidence that, after mitigation, there are cumulative effects associated with this project. Therefore, this project has been determined not to meet this Mandatory Finding of Significance.

c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

☐ Potentially Significant Impact ☐ Less than Significant Impact
☒ Less Than Significant With Mitigation Incorporated ☐ No Impact

In the evaluation of environmental impacts in this Initial Study, the potential for adverse direct or indirect impacts to human beings were considered in the response to certain questions in Sections I. Aesthetics, III. Air Quality, VII. Geology and Soils, IX. Hazards and Hazardous Materials, X Hydrology and Water Quality, XIII. Noise, XIV. Population and Housing, and XVII. Transportation and Traffic. As a result of this evaluation, there were determined to be no potentially significant effects to human beings.

As a result of this evaluation, there is no substantial evidence that, after mitigation, there would be adverse effects to human beings associated with this project. Therefore, this project has been determined not to meet this Mandatory Finding of Significance.

XXI. REFERENCES USED IN THE COMPLETION OF THE INITIAL STUDY CHECKLIST

- County of San Diego. 2007a. Guidelines for Determining Significance for Air Quality.
<https://www.sandiegocounty.gov/content/dam/sdc/pds/ProjectPlanning/docs/AQ-Guidelines.pdf>.
- County of San Diego. 2007b. Guidelines for Determining Significance for Geologic Hazards.
https://www.sandiegocounty.gov/dplu/docs/Geologic_Hazards_Guidelines.pdf.
- County of San Diego. 2007c. Guidelines for Determining Significance for Unique Geology Resources.
https://www.sandiegocounty.gov/content/dam/sdc/pds/docs/unique_geology_guidelines.pdf.
- County of San Diego. 2009. Guidelines for Determining Significance for Paleontological Hazards. <https://www.sandiegocounty.gov/dplu/docs/Paleo-Guidelines.pdf>.
- County of San Diego. 2011a. General Plan Update Environmental Impact Report.
<https://www.sandiegocounty.gov/content/sdc/pds/generalplan/GP-EIR.html>.
- County of San Diego. 2011b. County of San Diego General Plan, Bonsall Community Plan.
<https://www.sandiegocounty.gov/content/sdc/pds/gpupdate/BONSALL%20CP-08-03-11.pdf>.
- County of San Diego. 2015. Guidelines for Determining Significance for Agricultural Resources.
<https://www.sandiegocounty.gov/content/dam/sdc/pds/ProjectPlanning/docs/AG-Guidelines.pdf>.
- DTSC (California Department of Toxic Substances Control). 2018. EnviroStor.
<https://www.envirostor.dtsc.ca.gov/public/>.
- State Water Resources Control Board. 2018. Geotracker.
<https://geotracker.waterboards.ca.gov/>.
- URS. 2004. Multi-Jurisdictional Hazard Mitigation Plan, San Diego County.
- All references to Federal, State and local regulation are available on the Internet. For Federal regulation refer to <http://www4.law.cornell.edu/uscode/>. For State regulation refer to www.leginfo.ca.gov. For County regulation refer to www.amlegal.com. All other references are available upon request.

Appendices

A – CalEEMod Results (November 15, 2023)

B – Biological Resources Letter Report for the Enhanced Emergency Services Access Roadway Grading Permit, at San Luis Rey Training Center. Spetnagel, Jason; ECORP Consulting, Inc., (March 9, 2022).

C – Geotechnical Investigation. Myers, Trevor; Geocon, Inc. (July 16, 2019).

D – Standard Stormwater Quality Management Plan. Kozlik, Kenneth T.; FUSCOE Engineering, Inc. (March 17, 2022).

E – Drainage Study. FUSCOE Engineering, Inc., (January 2020).

F – Hydrology Memorandum, San Luis Rey Training Center Grading Plan. Kozlik, Kenneth T.; FUSCOE Engineering, Inc. (January 31, 2020)

G – San Luis Training Center SWPPP. Smith, Emma, FUSCOE Engineering, Inc. (August 7, 2020).

H – CAP Consistency Review Checklist (April 22, 2025)