

# ENVIRONMENTAL CHECKLIST

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## Initial Study

1. Project Title: North County Plan
2. Lead Agency Name and Address: County of San Diego  
Department of Planning & Development Services  
Sustainability Planning Division  
5510 Overland Avenue, Suite 210  
San Diego, CA 92123
3. Contact Person and Phone Number: Stephanie Neal, Project Manager, (619) 510-5575
4. Project Location: San Diego County is bounded by the counties of Orange and Riverside to the north, the County of Imperial to the east, the United States–Mexico international border to the south, and the Pacific Ocean to the west. The North County Plan Area encompasses the northwestern unincorporated areas of San Diego County, totaling 699,411 acres.
5. Project Sponsor's Name and Address: County of San Diego  
Department of Planning & Development Services  
Sustainability Planning Division  
5510 Overland Avenue, Suite 210  
San Diego, CA 92123
6. General Plan Designation(s): Various
7. Zoning: Various
8. Description of Project: (Describe the whole action involved, including but not limited to later phases of the project, and any secondary, support, or off-site features necessary for its implementation. Attach additional sheets if necessary.)

The County of San Diego's Multiple Species Conservation Program (MSCP) is a long-term, regional habitat conservation program focusing on balancing two unique aspects of San Diego County: high biological diversity and rapid urban growth. Under this program, large blocks of interconnected habitat would be conserved through acquisition of land by private and public entities. The County's MSCP is comprised of three separate planning areas covering unincorporated regions of San Diego County in the South County, North County, and East County. The MSCP plans associated with each of the planning areas are the County Subarea Plan (South County Subarea Plan) (adopted), North County Plan (Plan, draft), and East County Plan (future).

The North County Plan Area (Plan Area) represents the geographic boundary that defines the extent of the analysis for the development of the North County Plan and encompasses the northwestern unincorporated areas of San Diego County, totaling 699,411 acres. Segments of the Plan Area are separated by land in incorporated cities, and not subject to this Plan. The northern border of the Plan Area follows the County's boundary with Orange and Riverside counties. The western border of the Plan Area follows the boundary of unincorporated areas and the cities of Fallbrook, Oceanside, Vista, Carlsbad, Encinitas, Escondido, and San Diego. There are also County-owned or County-managed lands within the incorporated cities within the Multiple Habitat Conservation Program (MHCP) Plan Area in the western portions of the Plan Area. The southern border of the Plan Area mostly follows the boundary of the South County Subarea Plan and the San Diego River watershed boundary. The eastern boundary is along the mountain-desert divide and follows parcel and ownership boundaries in that area.

The North County Plan (North County Plan, Plan or Project) would provide take coverage for 40 species, specifically 31 animals and 9 plant species (Covered Species). These Covered Species are currently listed as threatened or endangered by California and/or the federal government, may become listed during the 30-year permit term, or serve as a species whose presence indicates elements of habitat structure and ecological function or habitat connectivity. Of the total 40 Covered Species included in this Plan, 24 are state or federally listed or proposed to be listed as endangered or threatened. This Plan includes measures to conserve all the Covered Species, whether listed or not.

The North County Plan would extend the benefits of the existing MSCP (the South County Subarea Plan) to contribute to the conservation of sensitive species and habitats while providing a streamlined permitting process for landowners, agricultural operators, businesses, and residents in the unincorporated regions of northwest San Diego County.

The Plan also aims to conserve and protect habitats for the Covered Species by creating and managing a North County Preserve (Preserve). This Preserve would ensure the conservation and management of the 40 Covered Species by conserving the natural communities covered by the Plan across a range of elevations to allow species and habitats to shift spatially in response to climate change. Monitoring and adaptive management would ensure habitat conservation and aid in species recovery. Implementation of the Plan would create a connected Preserve, allowing species to move freely and maintain ecological processes. This would also benefit other sensitive species and may prevent the need to list additional species as threatened or endangered.

While the Plan would facilitate a streamlined permitting process for development within areas already planned for development under the County's General Plan, it would not result in any additional urban development or changes in the intensity of development within the Plan area. Rather, the Plan would designate specific parcels for conservation that could also potentially be subject to incidental habitat restoration, vegetation management, minor surface grading, irrigation, or other related physical activities associated with enhancement and maintenance of habitat or the provision of compatible recreational opportunities on Preserve land. The Plan is independent and not reliant on other regional conservation plans in San Diego or Riverside counties. It is separate from other subarea plans under the Multiple Species Conservation Program (MSCP) and Multiple Habitat Conservation Program (MHCP).

Goals of the North County Plan include the following:

- Provide a regulatory process that allows for efficient permitting of residential and commercial development, community infrastructure projects, agricultural expansion, as well as providing greater certainty for economic and urban development through the identification of appropriate locations for new development.
- Facilitate a balanced approach of conserving high biological value habitats while streamlining development in less biologically sensitive areas.
- Create a preserve that will protect and maintain ecosystem functions and values, maintain the range of natural biological communities, the 40 Covered Species and native biodiversity within the Plan Area, and maintain opportunities for movement and genetic exchange of native organisms.
- Conserve and maintain habitat to ensure protection of covered and other sensitive species that precludes the need for future listings of species as threatened or endangered.
- Conduct habitat management and restoration within the Preserve to maintain and enhance Covered Species habitat.
- Monitor the Covered Species populations within the Preserve to inform management and ensure the persistence of the Covered Species.
- Maintain the scenic beauty, natural biological diversity, cultural resources, and compatible recreational opportunities within the Plan Area to enhance the quality of life of the public while protecting the Covered Species.

Projects and activities covered under the incidental take permits include three general categories:

- Private development projects that conform to the Plan and the North County Biological Mitigation Ordinance (BMO)
- County projects and activities that conform to the Plan and the North County BMO
- Implementation of management and monitoring of the North County Preserve consistent with the requirements of the Plan, Framework Resource Management Plan (FRMP), and subsequent site-specific RMPs

This Initial Study (IS) evaluates the potential impacts of adopting and implementing the North County Plan. The purpose of this IS is to inform agency decision makers and the public regarding the potential environmental effects of adopting and implementing the North County Plan, whether such effects are significant and potential measures to mitigate significant effects that could reduce significant adverse environmental impacts.

#### 9. Surrounding Land Uses and Setting. (Briefly describe the project's surroundings.)

San Diego County is bounded by Orange and Riverside counties to the north, Imperial County to the east, the United States–Mexico international border to the south, and the Pacific Ocean to the west. The North County Plan Area encompasses the northwestern unincorporated areas of San Diego County, as shown in **Figure 1**, *Regional Location*.

Regional access to the Plan Area includes Interstate 5 (I-5) and I-15, which both run north and south throughout the western portion of the Plan Area, State Highway 67 that runs north and south within the County, and State Highway 76 and 78 that both run east and west across the County.

Urban areas within the Plan Area are located predominantly in the western portion of the Plan Area and throughout the coastal cities of the County. Further east, the land is less developed and more rural in nature, with larger lot sizes. The Plan Area is predominantly agricultural in Bonsall, Fallbrook, North County Metro, Pala/Pauma, and Valley Center, as shown in **Figure 2, Existing Land Uses**.

10. Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement.)

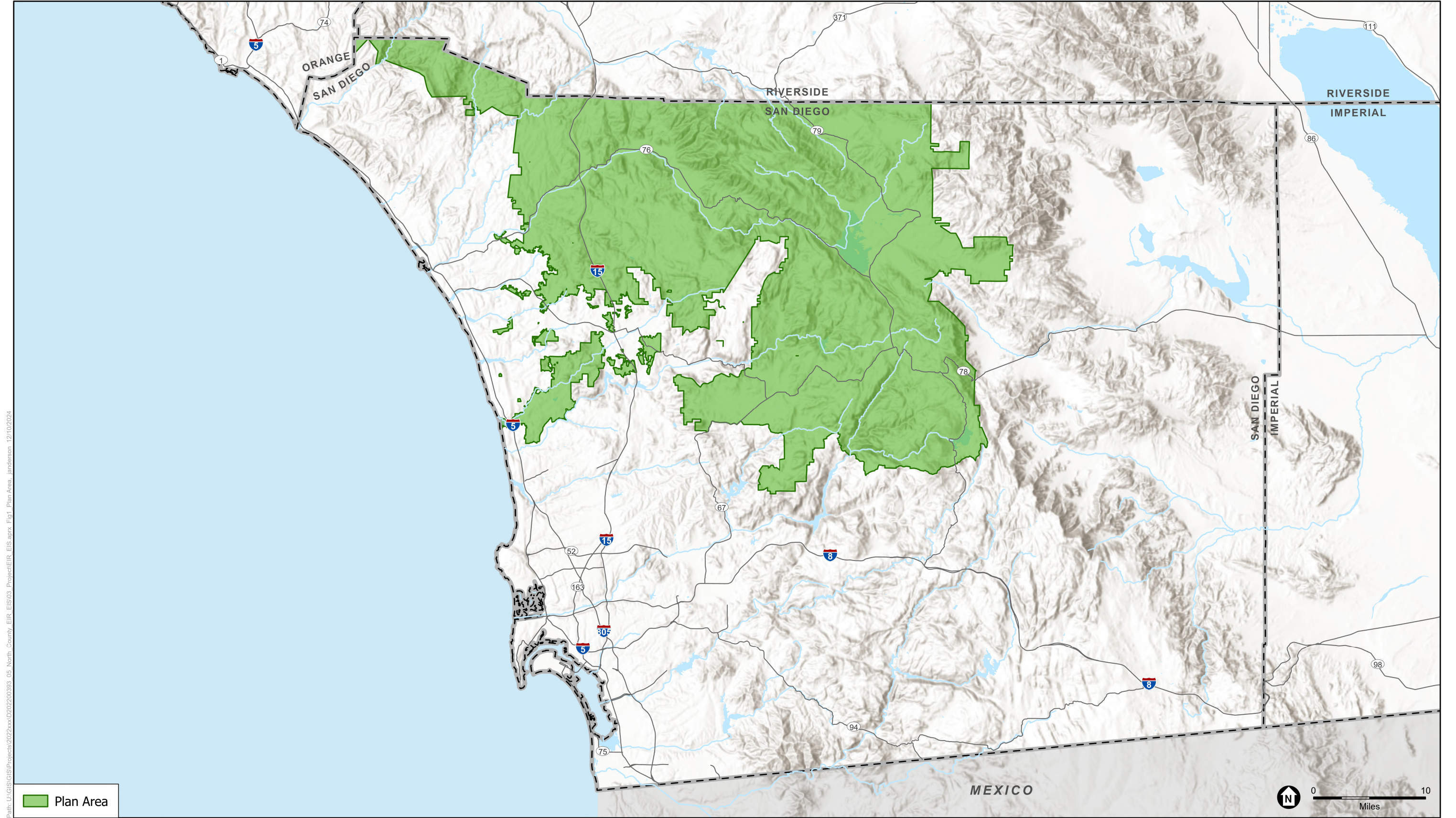
Agency	Permit Type/Action
County of San Diego	North County MSCP Plan Adoption NC Biological Mitigation Ordinance and Implementing Agreement
California Department of Fish and Wildlife (CDFW)	Incidental Take Permit/Take Authorization
U.S. Fish and Wildlife Service (USFWS)	Incidental Take Permit/Take Authorization

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

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

In accordance with California Assembly Bill 52 requirements, the County will initiate Tribal consultation, the results of which will be summarized in the Draft EIR.



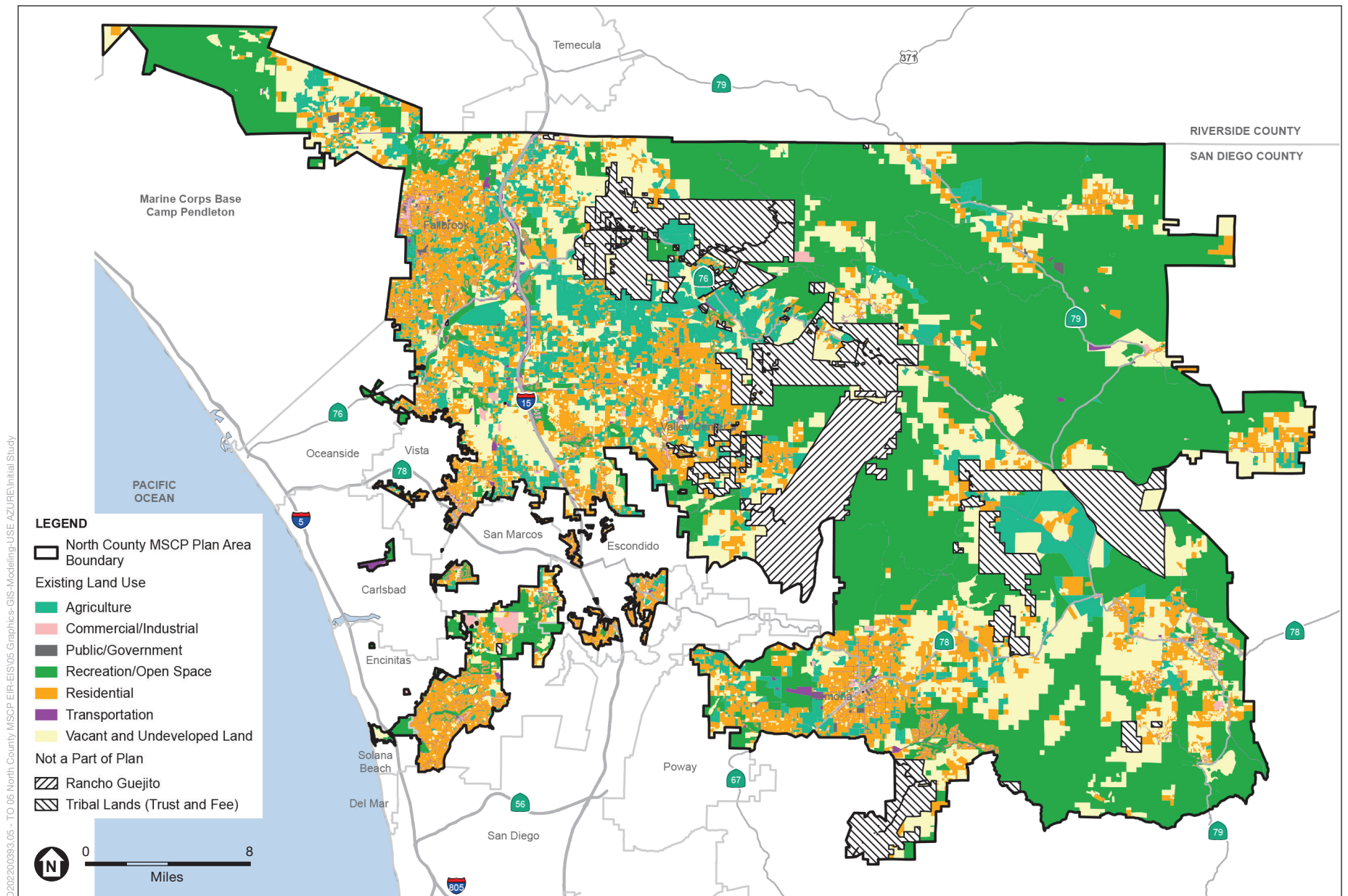


SOURCE: ESA, 2024; San Diego County, 2024.

North County Plan IS

**Figure 1**  
Regional Location





SOURCE: County of San Diego, SANDAG, SanGIS

North County Plan Project

**Figure 2**  
Existing Land Uses

## Environmental Factors Potentially Affected

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a “Potentially Significant Impact” as indicated by the checklist on the following pages.

- |  |  |  |
|--|--|--|
| <input type="checkbox"/> Aesthetics                      | <input checked="" type="checkbox"/> Agriculture and Forestry Resources | <input checked="" type="checkbox"/> Air Quality                        |
| <input checked="" type="checkbox"/> Biological Resources | <input checked="" type="checkbox"/> Cultural Resources                 | <input type="checkbox"/> Energy  |
| <input checked="" type="checkbox"/> Geology/Soils        | <input checked="" type="checkbox"/> Greenhouse Gas Emissions           | <input type="checkbox"/> Hazards & Hazardous Materials                 |
| <input type="checkbox"/> Hydrology/Water Quality         | <input checked="" type="checkbox"/> Land Use/Planning                  | <input checked="" type="checkbox"/> Mineral Resources                  |
| <input checked="" type="checkbox"/> Noise                | <input type="checkbox"/> Population/Housing                            | <input checked="" type="checkbox"/> Public Services                    |
| <input checked="" type="checkbox"/> Recreation           | <input checked="" type="checkbox"/> Transportation                     | <input checked="" type="checkbox"/> Tribal Cultural Resources          |
| <input type="checkbox"/> Utilities/Service Systems       | <input type="checkbox"/> Wildfire                                      | <input checked="" type="checkbox"/> Mandatory Findings of Significance |

### DETERMINATION: (To be completed by the Lead Agency)

On the basis of this initial study:

- ☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- ☐ I find 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.
- ☒ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- ☐ I find that the proposed project MAY have a “potentially significant impact” or “potentially significant unless mitigated” impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- ☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.



Signature

Stephanie Neal  
Printed Name

March 6, 2025

Date

Project Manager  
Title

# Environmental Checklist

## Aesthetics

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
<b>I. AESTHETICS</b> — Except as provided in Public Resources Code Section 21099, would the project:				
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Create a new source of substantial light or glare which would adversely affect daytime or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

## Discussion

- a) **Less Than Significant Impact.** A scenic vista is a public viewpoint that provides expansive views of a highly valued landscape for the benefit of the public. The Plan Area contains scenic highways, corridors, natural features such as unique topographic resources, dark skies, historical built environment including architectural design, historical structures, trails, and districts, all of which can be considered valuable scenic resources (San Diego County 2011). The North County Plan proposes to create large, connected preserve areas that address regional habitat needs for the Covered Species through the acquisition of land by private and public entities. The North County Plan would also streamline the land use permitting process and encourage development in already developed areas and outside of the proposed preserve areas, which would not result in a substantial adverse effect on a scenic vista. While many public locations within San Diego County offer views of scenic resources, including views from public roads and trails or other accessible public property both County-wide and within the Plan Area, and while the North County Plan may direct where conservation is required, no development is proposed as part of the North County Plan, the visual effects of the North County Plan would not be significant. Based on the above, adoption of the North County Plan would result in minimal impact on scenic vistas. Therefore, impacts would be less than significant, and no further analysis of this issue is warranted in the EIR.
- b) **Less Than Significant Impact.** State scenic highways refer to those highways that are officially designated by the California Department of Transportation (Caltrans) . According to the California State Scenic Highway System Map, there are no officially designated scenic highways in the Plan Area (Caltrans 2024). The nearest officially designated scenic highway is State Route 78, located approximately 37 miles east of the Plan Area when traveling along State Route 78, near the North Pinyon Mountains. The nearest eligible scenic highways in the

Plan Area include I-5, I-15, State Route 76, 78, and 79, as shown in Figure 3, *Scenic Highways in the Plan Area* (Caltrans 2024). Additionally, the San Diego County General Plan Conservation and Open Space Element identifies various scenic routes throughout San Diego County and within the Plan Area (San Diego County 2011). The North County Plan would not adversely impact any of these scenic highways, corridors, and routes because while the North County Plan may direct where development may occur, the North County Plan would not propose development that would result in visible alterations to the visual environment. Since no development is proposed under the North County Plan, its adoption would result in less than significant impacts to trees, rock outcroppings, and historic buildings within a state scenic highway. No further analysis of this issue is warranted in the EIR.

- c) **Less Than Significant Impact.** As discussed in Responses “I.a” and “I.b” above, in non-urbanized areas of the Plan Area, lands would be preserved for habitat conservation and preservation. Although the North County Plan could include restoration, maintenance, and monitoring activities such as vegetation removal, minor grading, native plantings, and associated equipment and personnel staging, such activities would be temporary in nature and would generally be localized, limited in intensity, and would result in enhanced habitat quality for Covered Species without the introduction of visually intrusive or prominent features that could detract from the existing visual character or quality of the areas being preserved under the Plan. Therefore, implementation of habitat preservation and enhancement activities consistent with the Plan would not be expected to substantially degrade the existing visual character or quality of public views and its surroundings. In addition, since the North County Plan does not propose development, no notable changes to visual quality or character would occur. The North County Plan is not expected to conflict with the aesthetics and visual resources plan and policies of the San Diego County General Plan because no development is proposed that would result in visible alternations to the visual environment. Since no development is proposed and implementation would involve localized habitat restoration, maintenance, and monitoring activities with minimal visual changes to affected sites, adoption of the North County Plan would not conflict with the existing zoning or other plans and policies pertaining to aesthetics and visual resources. Therefore, impacts would be less than significant, and no further analysis of this issue is warranted in the EIR.
- d) **No Impact.** As discussed above, the North County Plan is not expected to result in any new development or substantial modifications to development patterns in the Plan Area. Accordingly, the Plan is not expected to create new sources of substantial light or glare, which would adversely affect day or nighttime views in the Plan Area because no development is proposed. The North County Plan would not involve any physical improvements such as outdoor lighting or building materials with highly reflective properties that would result in substantial light or glare. The North County Plan would serve as an avenue for the implementation of goals and policies outlined in the San Diego County General Plan pertaining to biological preservation and conservation. Although the North County Plan would streamline the land use permitting process and encourage additional development within developed areas of the Plan Area, any future discretionary project that is located within the Plan Area boundaries would be subject to CEQA and further environmental review. The North County Plan would not alter or modify any established policies regulating lighting associated with future development. Therefore, no impact would occur, and no further analysis of this issue is warranted in the EIR.







## References

Caltrans, 2024. California State Scenic Highway System Map. Available online at:  
<https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aaca>, accessed November 7, 2024.

San Diego County, 2011. General Plan Chapter 5 Conservation and Open Space Element. Available online at:  
<https://www.sandiegocounty.gov/content/dam/sdc/pds/gpupdate/docs/GP/ConservationandOpenSpace.pdf>, accessed November 6, 2024.

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## Agriculture and Forestry Resources

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
<b>II. AGRICULTURE AND FORESTRY RESOURCES —</b>				
In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Result in the loss of forest land or conversion of forest land to non-forest use?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

## Discussion

- a) **Potentially Significant Impact.** Based on a review of the San Diego County General Plan Conservation and Open Space Element, San Diego County has the fourth highest number of farms of any county in the country and third highest number of farms of any county in California (San Diego County 2011). The Plan Area encompasses large areas of existing agriculture that maintain conservation value for endangered species and serve as valuable open space. According to the Department of Conservation (DOC), the Plan Area is comprised of Prime Farmland, Farmland of Statewide Importance, Unique Farmland, Grazing Land, Farmland of Local Importance, Other Land, Vacant or Disturbed Land, Rural Residential Land, and Urban and Built-Up Land (DOC 2022a). Since the North County Plan proposes to create large, connected preserve areas through the acquisition of land by private and public entities and since the proposed amount of land to be acquired is unknown at the time of this Initial Study, adoption of the North County Plan has the potential to convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to a non-agricultural use. Therefore, impacts would be potentially significant, and further analysis of this issue is warranted in the EIR.



- b) **Less Than Significant Impact.** According to the DOC, the Plan Area contains Prime Agricultural Land and Nonprime Agriculture Land that are within a Williamson Act contract (DOC 2022b). Portions of the Plan Area are located within two agricultural zones: Limited Agricultural (A70) and General Agricultural (A72). These zones allow multiple land uses and do not limit preserves, conservation easements, or dedicated open space easements, which may be created in A70 and A72 zones as a result of the North County Plan (San Diego County, 1978). Williamson Act contracts limit land development to specific uses like agriculture, recreation, and open space. The North County Plan aims to create connected preserve areas for regional habitat needs, and the proposed land uses are consistent with A70 and A72 and thus, the North County Plan would be consistent with Williamson Act contracts and would not conflict with any other agricultural zoning. Therefore, impacts would be less than significant, and no further analysis of this issue is warranted in the EIR.
- c) **Potentially Significant Impact.** San Diego County does not include lands designated or zoned for forest land, timberland, or timberland production (San Diego County 2017). However, San Diego County contains lands managed by the United States Forest Service (USFS) including the Cleveland National Forest and other areas like the Palomar, Volcan, Hot Springs, Cuyamaca, and Laguna Mountains (San Diego County 2017). Since the North County Plan proposes to create large, connected preserve areas through the acquisition of land by private and public entities and since the proposed amount of land to be acquired is unknown at the time of this Initial Study, the adoption of the North County Plan has the potential to conflict with existing zoning or cause rezoning of forest land, timberland, or timberland production. Therefore, impacts would be potentially significant, and further analysis is warranted in the EIR.
- d) **Potentially Significant Impact.** As discussed in Response “II.c” above, San Diego County includes lands managed by the USFS including the Cleveland National Forest and other areas like the Palomar, Volcan, Hot Springs, Cuyamaca, and Laguna Mountains (San Diego County 2017). Since the North County Plan proposes to create large, connected preserve areas through the acquisition of land by private and public entities and since the proposed amount of land to be acquired is unknown at the time of this Initial Study, the adoption of the North County Plan has the potential to result in the loss of forest land or conversion of forest land to non-forest use. Therefore, impacts would be potentially significant, and further analysis is warranted in the EIR.
- e) **Potentially Significant Impact.** The Plan Area would acquire lands by private and public entities to create large, connected preserve areas. As discussed, the Plan Area consists of state designated Farmland and lands managed by the USFS. Adoption of the North County Plan has the potential to cause conversion of Farmland to non-agricultural uses and/or conversion of forest land to non-forest use through the acquisition of land. Therefore, impacts would be potentially significant, and further analysis is warranted in the EIR.

## References

- DOC, 2022a. California Important Farmland Finder. Available online at: <https://maps.conservation.ca.gov/dlrp/ciff/>, accessed November 8, 2024.
- DOC, 2022b. California Williamson Act Enrollment Finder. Available online at: <https://maps.conservation.ca.gov/dlrp/WilliamsonAct/>, accessed November 8, 2024.
- San Diego County, 1978. Ordinance No. 5281 (New Series), San Diego County Zoning Code, Sections 2700 and 2720, Adopted October 18, 1978, Effective December 19, 1978.
- San Diego County, 2011. General Plan Chapter 5 Conservation and Open Space Element. Available online at: <https://www.sandiegocounty.gov/content/dam/sdc/pds/gpupdate/docs/GP/ConservationandOpenSpace.pdf>, accessed November 6, 2024.
- San Diego County, 2017. County of San Diego Supplement to the 2011 General Plan Update (GPU) Program Environmental Impact Report (PEIR), Agriculture and Forestry Resources. Available online at: <https://www.sandiegocounty.gov/content/dam/sdc/pds/advance/cap/publicreviewdocuments/DraftSEIRdocuments/2.2%20Agricultural%20Resources.pdf>, accessed November 8, 2024.
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## Air Quality

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
<b>III. AIR QUALITY —</b>				
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 applicable air quality plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Expose sensitive receptors to substantial pollutant concentrations?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

## Discussion

- a) **Potentially Significant Impact.** As discussed in the *Project Description*, the North County Plan does not propose development and thus would not alter the San Diego Association of Governments (SANDAG) population growth projections (SANDAG 2021). The adoption of the North County Plan would not result in direct emissions of substantial quantities of criteria pollutants listed in the California Ambient Air Quality Standards or toxic air contaminants as identified by the California Air Resources Board (CARB). However, the North County Plan includes measures to conserve all the Covered Species and would include maintenance and monitoring of future preserve areas, as well as restoration of habitat where necessary. It is anticipated that these restoration, maintenance, and monitoring activities could generate substantial emissions and/or vehicle trips based on a temporary basis, or an ongoing (weekly or monthly) basis. Since the amount of vehicle trips generated by the North County Plan are unknown at the time of this Initial Study, adoption of the North County Plan has the potential to conflict or obstruct an applicable air quality plan. Therefore, impacts would be potentially significant, and further analysis of this issue is warranted in the EIR.
- b) **Potentially Significant Impact.** San Diego County is located within the San Diego Air Basin (SDAB), which is currently designated as an attainment area for carbon monoxide (CO), nitrogen dioxide (NO<sub>2</sub>), lead (Pb), sulfur dioxide (SO<sub>2</sub>), and sulfates (SO<sub>4</sub><sup>2-</sup>) (San Diego County 2021). However, San Diego County is designated as non-attainment for ozone (O<sub>3</sub>) under federal and state ambient air quality standards and non-attainment for O<sub>3</sub>, fine particulate matter (PM<sub>2.5</sub>), and coarse particulate matter (PM<sub>10</sub>) under state ambient air quality standards. The North County Plan does not propose development within the Plan Area; however, adoption of the Plan would result in restoration, maintenance, and monitoring activities that could generate substantial emissions and/or vehicle trips and thus would have the potential to emit criteria air pollutants. Since the amount of air pollutants generated by the North County Plan are unknown at this time, adoption of the North County Plan has the potential to result in cumulatively considerable net increase of any critical pollutant for which San Diego County is non-attainment under an applicable federal

or state ambient air quality standard. Therefore, impacts would be potentially significant, and further analysis of this issue is warranted in the EIR.

- c) **Potentially Significant Impact.** As discussed, the North County Plan does not propose new development; therefore, the North County Plan would not generate any construction-related emissions. Sensitive receptors, including residences, daycare centers, schools, hospitals, and other uses with higher sensitivity to air pollutant emissions, are located throughout the Plan Area, including some locations adjacent to the proposed preserve areas. Regarding mobile sources, the North County Plan includes measures to conserve all the Covered Species through restoration activities as well as routine maintenance and monitoring activities, which could result in substantial vehicle trips and substantial pollutant concentrations. Since the amount of vehicle trips and pollutants generated by the North County Plan are unknown at the time of this Initial Study, adoption of the North County Plan has the potential to expose sensitive receptors to substantial pollutant concentrations associated with restoration and routine maintenance and monitoring activities. Therefore, impacts would be potentially significant, and further analysis of this issue is warranted in the EIR.
- d) **Potentially Significant Impact.** Although the North County Plan does not propose new development which would result in direct emissions of objectionable odors or other emissions, the activities associated with the conservation and preservation of wildlife and species habitat could result in odors. The North County Plan proposes to create large, connected preserve areas through the acquisition of land by private and public entities which may consist of habitat and riparian restoration which could generate odors from increased decomposition of organic matter compared to existing conditions. Other potential odor-generating emissions activities include invasive species removal, which could generate odors from decaying vegetation or organic matter. Acquisition of land and the conversion of land to preserve areas could also generate odors by ground disturbance, cleaning up future project sites, remediating land with chemicals or other contaminants, and equipment use. Since the proposed amount of land to be acquired and/or converted is unknown at the time of this Initial Study, adoption of the North County Plan has the potential to create other emissions, such as objectionable odors that could adversely affect a substantial number of people. Therefore, impacts would be potentially significant, and further analysis of this issue is warranted in the EIR.

## References

- San Diego County, 2021. County of San Diego Supplement to the 2011 GPU PEIR, Air Quality. Available online at: [https://www.sandiegocounty.gov/content/dam/sdc/pds/gpupdate/docs/BOS\\_Aug2011/EIR/FEIR\\_2.03\\_-\\_Air\\_Quality\\_2011.pdf](https://www.sandiegocounty.gov/content/dam/sdc/pds/gpupdate/docs/BOS_Aug2011/EIR/FEIR_2.03_-_Air_Quality_2011.pdf), accessed November 8, 2024.
- SANDAG, 2021. 2021 Regional Plan. Available online at: <https://www.sandag.org/-/media/SANDAG/Documents/PDF/regional-plan/2021-regional-plan/final-2021-regional-plan/final-2021-regional-plan-flipbook.pdf>, accessed November 8, 2024.
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## Biological Resources

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
<b>IV. BIOLOGICAL RESOURCES — Would the project:</b>				
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 Game or U.S. Fish and Wildlife Service?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

## Discussion

- a) **Potentially Significant Impact.** The North County Plan is focused on the coverage of 40 species that are listed endangered or threatened and proposes to create large, connected preserve areas that address regional habitat needs for the Covered Species through the acquisition of land by private and public entities. The North County Plan would also streamline the land use permitting process and encourage development in already developed areas and outside of the proposed preserve areas. The North County Plan would be subject to the federal Endangered Species Act, Section 10(a)(1)(B) and the Natural Community Conservation Planning (NCCP) Act, Section 2800 et seq of the California Fish and Game Code. For the acquisition of land by private and public entities, the North County Plan would be submitted to the wildlife agencies including the U.S. Fish and Wildlife Service (USFWS) and the California Department of Fish and Wildlife (CDFW) to obtain long-term Take Authorization and thus allow the taking of certain Covered Species incidental to land development and other lawful land uses which are authorized by the County. Since the proposed amount of land to be acquired is unknown at the time of this Initial Study, adoption of the North County Plan has the potential to result in potentially significant impacts to the Covered Species and their habitats and existing species and habitats in the Plan Area. Therefore, impacts would be potentially significant, and further analysis of this issue is warranted in the EIR.

- b) **Potentially Significant Impact.** As discussed, the North County Plan would create large, connected preserve areas that address regional habitat needs for the Covered Species through the acquisition of land by private and public entities. As discussed in Response “IV.a” above, the North County Plan would take coverage of 40 species and their habitat, including riparian habitat and species. Although the proposed amount of land that would be altered due to restoration or maintenance activities, which could result in a substantial adverse effect on a riparian habitat or other sensitive natural community, is unknown at the time of this Initial Study, adoption of the North County Plan has the potential to result in a substantial adverse effect on riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by CDFW or USFWS. Therefore, impacts would be potentially significant, and further analysis of this issue is warranted in the EIR.
- c) **Potentially Significant Impact.** The North County Plan would not generate direct change to the physical environment as no development is proposed. However, as discussed in Response “IV.a” above, the North County Plan would provide take coverage for 40 species and their habitat by creating large, connected preserve areas. According to the National Wetlands Inventory, the Plan Area contains wetlands, riparian habitats, and other areas of interest, and thus, the restoration, maintenance, and monitoring activities under the Plan could result in alteration to existing habitat. (USFWS 2024). Since the proposed amount of land to be acquired and the specific wetlands to be affected from the North County Plan are unknown at the time of this Initial Study, adoption of the North County Plan has the potential to result in potentially significant impacts on federally protected wetlands through direct removal, filling, hydrological interruption, or other means. Therefore, impacts would be potentially significant, and further analysis of this issue is warranted in the EIR.
- d) **Potentially Significant Impact.** The North County Plan would not generate direct change to the physical environment as no development is proposed. However, the take of 40 species and their habitat and the acquisition of land by private and public entities may divide or isolate smaller areas within the Plan Area and thus interfere with the movement of a 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. Since the proposed amount of land to be acquired and the specific species and habitats to be affected are unknown at the time of this Initial Study, adoption of the North County Plan has the potential to result in potentially significant impacts to 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. Therefore, impacts would be potentially significant, and further analysis of this issue is warranted in the EIR.
- e) **Potentially Significant Impact.** Although the North County Plan would not generate direct change to the physical environment as no development is proposed, the North County Plan would result in indirect impacts to biological resources and trees within the Plan Area through restoration, maintenance, and monitoring activities, including but not limited to clearing and grading of natural vegetation, minor grading/contouring, native plantings, and maintenance, repair, or minor alternation of designated trails. The acquisition of land by private and public entities would also result in indirect impacts to biological resources and trees through the conversion of land to preserve areas. Since the proposed amount of land to be acquired is

unknown at the time of this Initial Study, adoption of the North County Plan has the potential to conflict with local policies or ordinances protection biological resources, such as tree preservation policy or ordinance. Therefore, impacts would be potentially significant, and further analysis of this issue is warranted in the EIR.

- f) **Potentially Significant Impact.** Upon approval, the North County Plan would be submitted to the wildlife agencies including the USFWS and CDFW to obtain long-term Take Authorization, which would allow the coverage of the 40 Covered Species and habitats by private and public entities. Since the proposed amount of land to be acquired and specific habitats to be affected by the North County Plan are unknown at the time of this Initial Study, adoption of the North County Plan has the potential to conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional or state habitat conservation plan. Therefore, impacts would be potentially significant, and further analysis of this issue is warranted in the EIR.

## References

USFWS, 2024. National Wetlands Inventory. Available online at:  
<https://fwsprimary.wim.usgs.gov/wetlands/apps/wetlands-mapper/>, accessed November 8, 2024.

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## Cultural Resources

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
<b>V. CULTURAL RESOURCES —</b> Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Disturb any human remains, including those interred outside of dedicated cemeteries?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

## Discussion

- a) **Potentially Significant Impact.** As discussed, the North County Plan would create large, connected preserve areas that address regional habitat needs for the Covered Species through the acquisition of land by private and public entities. Based on a review of the San Diego County General Plan Conservation and Open Space Element, preserves are referred to areas of environmental significance and beauty and are focused on the protection of biological, cultural, and historical resources, as well as community character, and to make these resources available for public recreation opportunities (San Diego County 2011). Since the North County Plan includes the acquisition of land which has the potential to convert land uses to preserve areas, such areas acquired could contain historical resources on site and thus, the North County Plan has the potential to create a substantial adverse change in the significance of a historical resource. Therefore, impacts would be potentially significant, and further analysis of this issue is warranted in the EIR.
- b) **Potentially Significant Impact.** The North County Plan includes the acquisition of land which has the potential to convert land uses to preserve areas, such areas acquired could have archeological resources on site and thus, the North County Plan has the potential to create a substantial adverse change in the significance of an archeological resource. Therefore, impacts would be potentially significant, and further analysis of this issue is warranted in the EIR.
- c) **Potentially Significant Impact.** Due to the Plan Area's series of streams that would have provided a food source and fresh water to prehistoric inhabitants, human remains could be present in the native soils in the Plan Area. Although the North County Plan does not propose development, the restoration, maintenance, and monitoring activities under the North County Plan could include ground disturbance and thus would have the potential to disturb undiscovered and/or unknown human remains. Therefore, impacts would be potentially significant, and further analysis of this issue is warranted in the EIR.

## References

San Diego County, 2011. General Plan Chapter 5 Conservation and Open Space Element. Available online at: <https://www.sandiegocounty.gov/content/dam/sdc/pds/gpupdate/docs/GP/ConservationandOpenSpace.pdf>, accessed November 6, 2024.



## Energy

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
<b>VI. ENERGY —</b> Would the project:				
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

## Discussion

- a) **Less Than Significant Impact.** The North County Plan does not propose new development and, as such, would not result in direct impacts due to wasteful, inefficient, or unnecessary consumption of energy related to construction and operation activities. Restoration activities, as well as ongoing maintenance and monitoring activities that would occur as a result of adoption of the Plan would generate an increased demand for energy and transportation fuels generated by the operation of equipment and vehicles traveling to and from the Plan Area. Energy and transportation fuel demand from maintenance equipment and vehicles would vary depending on factors such as the type and duration that the equipment and vehicles are powered on and used. However, the North County Plan would comply with anti-idling and emissions regulations, which would result in efficient use of energy and the minimization or elimination of wasteful and unnecessary consumption of energy. Based on the above, the North County Plan would not result in the wasteful, inefficient, and unnecessary consumption of energy and would not increase the need for new energy infrastructure. Therefore, impacts would be less than significant, and no further analysis of this issue is warranted in the EIR.
- b) **Less Than Significant Impact.** The adoption of the North County Plan would result in restoration, maintenance, and monitoring activities that would include energy consumption sources that are subject to state and local energy efficiency plans. On-road and off-road vehicles used during restoration, maintenance, and monitoring activities would be required to meet the ongoing federal and state fuel efficiency requirements. Additionally, all vehicles are required to comply with the California Air Resources Board (CARB) regulations regarding medium- and heavy-duty maintenance vehicles to ensure reduced fuel consumption from fuel-powered vehicles (CARB 2024). As discussed, discrete restoration efforts, as well as ongoing routine maintenance and monitoring activities, would require energy consumption from maintenance equipment and vehicles over the duration of the North County Plan. Since the energy consumption of vehicle trips generated by maintenance and monitoring activities is unknown at the time of this Initial Study and the North County Plan would comply with local and state regulations pertaining to energy, the North County Plan would not conflict with or obstruct a state or local plan. Therefore, impacts would be less than significant, and no further analysis of this issue is warranted in the EIR.

## References

CARB, 2024. CARB updates the Low Carbon Fuel Standard to increase access to cleaner fuels and zero-emission transportation options. Available online at: <https://ww2.arb.ca.gov/news/carb-updates-low-carbon-fuel-standard-increase-access-cleaner-fuels-and-zero-emission>, accessed November 11, 2024.

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## Geology and Soils

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
<b>VII. GEOLOGY AND SOILS —</b> 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"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

## Discussion

- a.i) **No Impact.** Fault rupture is a plane or surface in the earth where failure has occurred and materials on opposite sides have moved relative to one another in response to the accumulation and release of stress. The U.S. Geological Survey defines active faults as those that have had surface displacements within the Holocene epoch (about the last 11,000 years). Potentially active faults are those that have had surface displacement during the Quaternary period, within the last 1.6 million years. The Plan Area is located within an area of Southern California with numerous active and potentially active faults.

According to the Alquist-Priolo Site Investigation Reports Application, northeastern portions of the Plan Area are underlain by active Quaternary Faults including Holocene, Quaternary, and Late Quaternary Faults (CGS 2024). Additionally, there is an Alquist-Priolo Site Investigation Report located in the Aguanga Mountains and desert area (CGS 2024a). Although portions of the Plan Area are located in fault rupture zones, the North County Plan does not propose development which would expose people or structures to risks associated with fault rupture

hazard zones. The adoption of the North County Plan would not result in impacts from the exposure of people or structures to a known fault rupture hazard zone. Therefore, no impact would occur, and no further analysis of this issue is warranted in the EIR.

- a.ii) **No Impact.** The Plan Area is located in Southern California, an area that is subject to strong seismic ground shaking. Seismically induced ground acceleration is the shaking motion that is produced by an earthquake. As discussed in Response “VII.a,i” above, northeastern portions of the Plan Area are underlain by active Quaternary Faults and there is an Alquist-Priolo Site Investigation Report located in the Aguanga Mountains and desert area (CGS 2024a). Additionally, the San Diego County Safety Element, Figure S-2, highlights active and inactive faults and the seismic shaking buffer within the Plan Area (San Diego County 2021). The North County Plan does not propose development which would expose people or structures to strong seismic ground shaking, thus the adoption of the North County Plan would not have the potential to cause risk related to strong seismic ground shaking. Therefore, no impact would occur, and no further analysis of this issue is warranted in the EIR.

- a.iii) **No Impact.** Liquefaction is the phenomenon in which saturated granular sediments temporarily lose their shear strength during periods of earthquake-induced strong ground shaking. The susceptibility of a site to liquefaction is a function of the depth, density, and water content of the granular sediments, and the magnitude and frequencies of earthquakes in the surrounding region. Saturated, unconsolidated silts, sands, and silty sands within 50 feet of the ground surface are most susceptible to liquefaction. Liquefaction-related phenomena include lateral spreading, ground oscillation, flow failures, loss of bearing strength, subsidence, and buoyancy effects. In addition, densification of the soil resulting in vertical settlement of the ground can also occur. Liquefaction can result in damage to infrastructure, including foundations.

According to the California Department of Conservation (DOC) and the California Geologic Survey (CGS), the Plan Area is not located within liquefaction zones (CGS 2024b; DOC 2022). The North County Plan does not propose development which would expose people or structures to risks associated with seismic-related ground failure, thus the adoption of the North County Plan would not have the potential to cause substantial risk related to seismic-ground failure, including liquefaction. Therefore, no impact would occur, and no further analysis of this issue is warranted in the EIR.

- a.iv) **No Impact.** The geologic and topographic characteristics of an area often determine the potential for landslides. Landslides (or slope failures) are the dislodging and failing of a mass of soil or rocks along a sloped surface. Small-scale slope failure typically occurs along stream banks, margins of drainage channels, and similar settings where steep banks or slopes occur. According to the San Diego County General Plan Safety Element, Figure S-3, the Plan Area is located within moderate and high landslide zones (San Diego County 2021). However, the North County Plan does not propose development which would expose people or structures to landslides. Additionally, while maintenance activities could involve low-impact activities such as weeding, clearing, minor grading, and irrigation, these activities are not anticipated to contribute to or result in landslide risks to people or structures in the Plan Area. Therefore, no impact would occur, and no further analysis of this issue is warranted in the EIR.

- b) **Less Than Significant Impact.** The North County Plan does not propose development; thus, adoption of the North County Plan is not anticipated to result in substantial soil erosion or the loss of topsoil due to construction activities from urban development. However, potential habitat restoration, maintenance, and monitoring activities could involve vegetation clearing, grading, and operation of localized irrigation systems, all of which would have the potential to result in erosion or the loss of topsoil. Nonetheless, in compliance with established water quality regulations, including the National Pollutant Discharge Elimination System (NPDES) General Construction Permit and the County's Low Impact Development (LID) requirements, such activities would be performed in a manner to limit erosion and measures would be implemented including erosion control that would further reduce the potential for erosion or the loss of topsoil. Thus, the North County Plan would not result in substantial soil erosion or the loss of topsoil. Therefore, impacts would be less than significant, and no further analysis of this issue is warranted in the EIR.
- c) **No Impact.** Unstable geologic units or soils commonly occur when there are landslides, lateral spreading, subsidence/collapse, or liquefaction.

### ***Landslides***

Landslides are described in Response "VII.a.iv" above; as discussed therein, the Plan Area is located within moderate and high landslide zones (San Diego County 2021). The North County Plan does not propose development that can be affected by landslides or create conditions that would contribute to landslide risk. Therefore, no impact would occur, and no further analysis of this issue is warranted in the EIR.

### ***Lateral Spreading***

Lateral spreading movement occurs when a soil mass slides laterally on liquefied soil layers, moving downslope or towards a free face. As discussed in Response "VII.a.iii" above, the Plan Area is not located within liquefaction zones (CGS 2024b; DOC 2022). The North County Plan does not propose development that can be affected by lateral spreading. Therefore, no impact would occur, and no further analysis of this issue is warranted in the EIR.

### ***Subsidence/Collapse***

Subsidence or collapse is the sinking of the ground surface caused by the compression of earth materials resulting from man-made activities such as groundwater or oil and gas withdrawal. The resulting compression typically occurs only once within affected soils and cannot be reversed or repeated due to fluctuations of the groundwater level. The North County Plan does not propose development that can be affected by subsidence and/or collapse, and does not propose uses that would involve withdrawal of groundwater, oil, or gas. Therefore, no impact would occur, and no further analysis of this issue is warranted in the EIR.

### ***Liquefaction***

Liquefaction is discussed in Response “VII.a.iii” above and the Plan Area is not located within liquefaction zones. The North County Plan does not propose development that can be affected by liquefaction. Therefore, no impact would occur, and no further analysis of this issue is warranted in the EIR.

- d) **No Impact.** Expansive soil is characterized by a clay composition whereby clay particles expand dramatically upon wetting. Structures constructed on expansive soils require special design considerations that are identified within the California Building Code. Based on the San Diego County General Plan Safety Element, Figure S-4, the Plan Area is underlain by expansive clays (San Diego County 2021). However, the North County Plan does not propose development that can be affected by expansive soils. Therefore, no impact would occur, and no further analysis of this issue is warranted in the EIR.
- e) **No Impact.** The Plan Area and unincorporated areas of San Diego County are served by public and private entities, including the County, special districts, joint powers agencies, and regional authorities including Fallbrook Public Utility District, Rainbow Municipal Water District (MWD), Olivenhain MWD, Vallecitos Water District, City of Escondido, City of San Diego, Ramona MWD, and Valley Center MWD (San Diego County Water Authority 2024). The North County Plan does not propose development and would not involve the installation of septic tanks or alternative wastewater disposal systems. Therefore, no impact would occur, and no further analysis of this issue is warranted in the EIR.
- f) **Potentially Significant Impact.** Paleontological resources are the fossilized remains of organisms that have lived in the region in the geologic past and whose remains are found in the accompanying geologic strata. This type of fossil record represents the primary source of information on ancient life forms, since the majority of species that have existed on earth from this era are extinct. Based on a review of the San Diego County General Plan Conservation and Open Space Element, San Diego County is divided into three distinct geomorphic regions including the Coastal Plan, the Peninsular Ranges, and the Salton Trough (the desert) (San Diego County 2011). Each region is characterized by different climatic, topographic, biological, and geologic settings. Correspondingly, each region contains geologic deposits that are associated with particular types of fossils, some of which are unique within the context of California and even the United States (San Diego County 2011). Although the adoption of the North County Plan does not propose development, Plan-related habitat restoration, maintenance, and monitoring activities may include site clearing and grading that would have the potential to disturb existing and undiscovered paleontological resources in the Plan Area. Therefore, impacts would be potentially significant, and further analysis of this issue is warranted in the EIR.

## **References**

California Geological Survey (CGS), 2024a. Alquist-Priolo Site Investigation Reports Application. Available online at: <https://maps.conservation.ca.gov/cgs/informationwarehouse/apreports/>, accessed November 7, 2024.

CGS, 2024b. Earthquake Zones of Required Investigation. Available online at: <https://maps.conservation.ca.gov/cgs/EQZApp/app/>, accessed November 7, 2024.

California Department of Conservation (DOC), 2022. Seismic Hazards Program: Liquefaction Zones. Available online at: <https://maps-cnra-cadoc.opendata.arcgis.com/datasets/cadoc::cgs-seismic-hazards-program-liquefaction-zones/explore?location=33.192414%2C-116.755884%2C10.56>, accessed November 7, 2024.

San Diego County, 2011. General Plan Chapter 5 Conservation and Open Space Element. Available online at: <https://www.sandiegocounty.gov/content/dam/sdc/pds/gpupdate/docs/GP/ConservationandOpenSpace.pdf>, accessed November 6, 2024.

San Diego County, 2021. General Plan Safety Element. Available online at: <https://www.sandiegocounty.gov/content/dam/sdc/pds/gpupdate/SafetyElement-Aug2021.pdf>, accessed November 7, 2024.

San Diego County Water Authority, 2024. Agency Map. Available online at: <https://www.sdcwa.org/annualreport/2020/resources/member-agency-map.php>, accessed November 7, 2024.

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## Greenhouse Gas Emissions

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
<b>VIII. GREENHOUSE GAS EMISSIONS —</b> Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

## Discussion

- a) **Potentially Significant Impact.** The North County Plan does not propose development and thus, would not generate direct emissions of greenhouse gases (GHGs) from construction and demolition activities. However, adoption of the North County Plan would include habitat restoration, biological monitoring, and management of the Covered Species and vegetation communities within the Preserve that could generate GHG emissions through the use of mechanical equipment and vehicles traveling to and from the Plan Area. Since the amount of GHG emissions generated by the North County Plan is unknown at the time of this Initial Study and given the permit term of the North County Plan, it is anticipated that a substantial increase in GHG emissions could occur as a result of habitat restoration and routine maintenance and monitoring activities. Thus, adoption of the North County Plan has the potential to generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment. Therefore, impacts would be potentially significant, and further analysis of this issue is warranted in the EIR.
- b) **Potentially Significant Impact.** As discussed in Response “VIII.a” above, the North County Plan would involve habitat restoration, routine maintenance, and monitoring activities, which would generate GHG emissions through the operation of mechanical equipment and vehicles traveling to and from the Plan Area. Due to the limited information available pertaining to GHG emissions at the time of this Initial Study, adoption of the North County Plan would generate GHG emissions that could conflict with an applicable plan, policy, or regulation of an agency adopted for the purposes of reducing GHG emissions. Therefore, impacts would be potentially significant, and further analysis of this issue is warranted in the EIR.

## References

N/A



## Hazards and Hazardous Materials

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
<b>IX. HAZARDS AND HAZARDOUS MATERIALS —</b> Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

## Discussion

- a) **Less Than Significant Impact.** Exposure of the public or the environment to hazardous materials could occur through improper handling or use of hazardous materials or hazardous wastes particularly by untrained personnel, a transportation accident, environmentally unsound disposal methods, or fire, explosion, or other emergencies. The severity of potential effects varies with the activity conducted, the concentration and type of hazardous material or wastes present, and the proximity of sensitive receptors. The North County Plan would involve the use of herbicides and pesticides during maintenance and monitoring activities. Any such materials utilized during Plan-related activities would likely be applied in limited amounts, and their use would be regulated by federal and state laws to ensure safe transport, use, storage, and disposal. In compliance with regulations and in accordance with manufacturer specifications, adoption of the North County Plan would result in minimal impacts to the public or the environment through the routine transport, use, or disposal of hazardous materials. Therefore, less than significant impacts would occur, and no further analysis of this issue is warranted in the EIR.
- b) **Less Than Significant Impact.** The North County Plan may involve the use of herbicides and pesticides during maintenance and monitoring activities, as well as vehicle fuels and related

substances associated with worker vehicles and mechanical equipment. However, the North County Plan would not create a significant hazard to the public or the environment because such materials would be used in small localized amounts and in accordance with applicable regulations. Since the North County Plan would not require the use of hazardous materials in substantial amounts, and the incidental use of such materials under the Plan would comply with local, state, and federal regulations, the North County Plan would result in minimal impacts to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. Therefore, less than significant impacts would occur, and no further analysis of this issue is warranted in the EIR.

- c) **Less Than Significant Impact.** Some populations (e.g., children, elderly, sick, or disabled persons) are more susceptible to health effects of hazardous materials than the general population. Many schools are located within the Plan Area boundaries and as discussed above, the use of herbicides and pesticides during maintenance and monitoring activities may be used. However, any use, storage, handling, and disposal of potentially toxic substances would be handled in compliance with local, state, and federal regulations. Since the North County Plan would utilize hazardous materials in small amounts and in adherence to federal and state regulations, the North County Plan would not emit substantial hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing school. Thus, adoption of the North County Plan would not expose sensitive populations to substantial hazards or hazardous materials. Therefore, impacts would be less than significant, and no further analysis of this issue is warranted in the EIR.
- d) **No Impact.** Although portions of the North County Plan are located on areas that are on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, the North County Plan does not involve any specific land development. Any future discretionary project that is located within the Plan Area boundaries would be subject to CEQA and further environmental review. Therefore, no impact would occur, and no further analysis of this issue is warranted in the EIR.
- e) **No Impact.** The North County Plan encompasses the northwestern portion of the County, which contains various private airports including Lyall-Roberts Airport- 37CL, Pauma Valley Air Park, Rincon Airfield, Blackinton Airport Property, Warner Springs Air Park, Fallbrook Airpark, Ramon Airport, McClellan-Palomar Airport, Carlsbad Airport Centre (San Diego County 2011). Since the North County Plan does not propose development, adoption of the North County Plan would not have the potential to result in a safety hazard or excessive noise for people residing or working in the Plan Area. Therefore, no impact would occur, and no further analysis of this issue is warranted in the EIR.
- f) **No Impact.** The following sections summarize the Project's consistency with applicable emergency response plans or emergency evacuation plans.

### **San Diego County Operational Area Emergency Operations Plan**

The Operational Area Emergency Operations Plan (OA EOP) is designed to be used by individual jurisdictions within the OA for the development of their own emergency plans. In some cases,

with minor modifications as appropriate, the OA EOP can be used as the basis for city plans. It describes the roles and responsibilities of all County departments (including many city departments), and the relationship between the County and its departments and the jurisdictions within the County (San Diego County 2022). The North County Plan is consistent with the OA EOP because the Plan would not prohibit subsequent plans from being established.

### **San Diego County Multi-Jurisdictional Hazard Mitigation Plan**

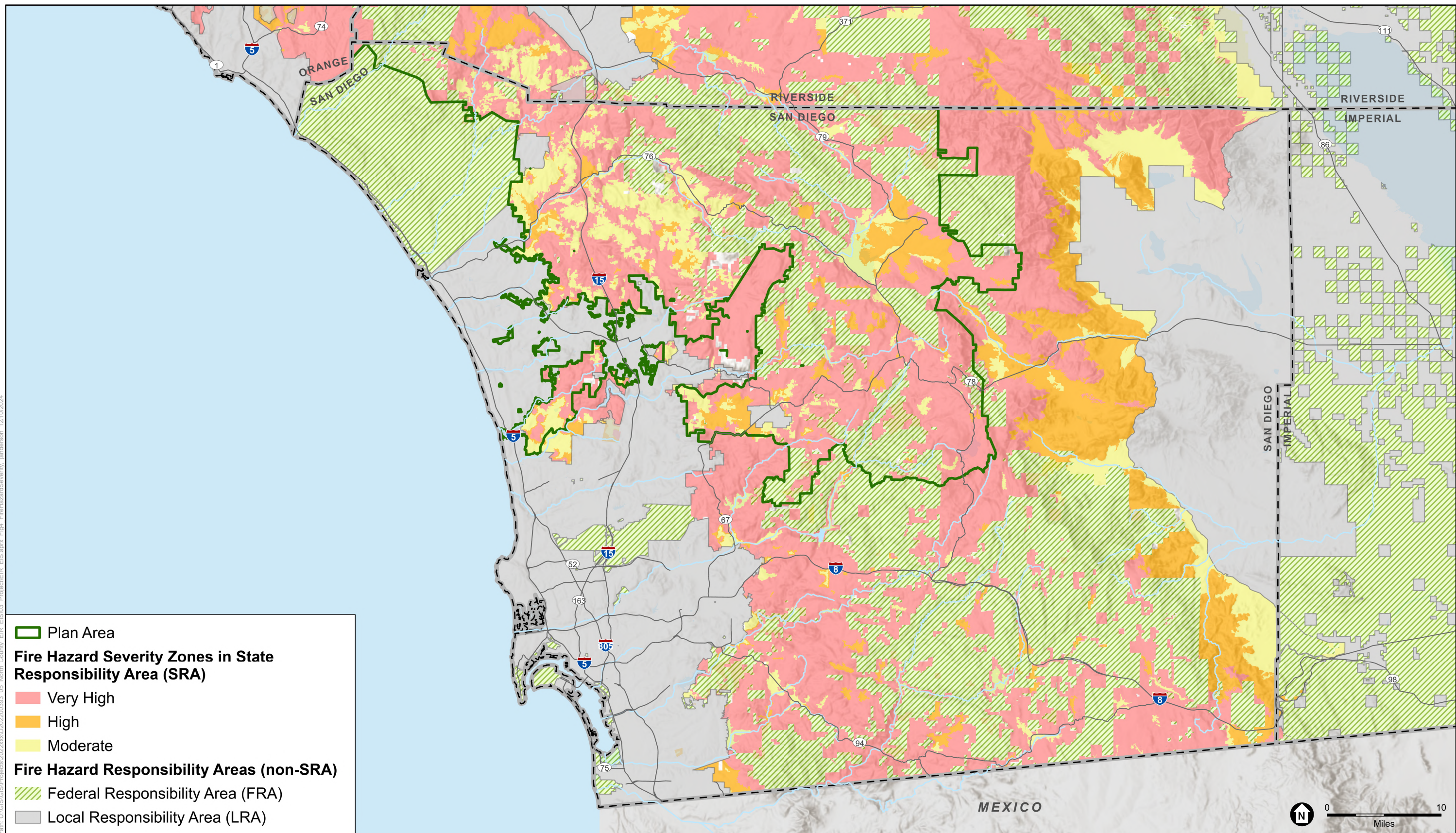
The Multi-Jurisdictional Hazard Mitigation Plan is a countywide plan that identifies risks and ways to minimize damage by natural and human-caused disasters. The Multi-Jurisdictional Hazard Mitigation Plan is a comprehensive resource document that serves many purposes such as enhancing public awareness, creating a decision tool for management, promoting compliance with State and Federal program requirements, enhancing local policies for hazard mitigation capability, and providing inter-jurisdictional coordination (San Diego County 2023). The North County Plan would not conflict with the Multi-Jurisdictional Hazard Mitigation Plan due to the Multi-Jurisdictional Hazard Mitigation Plan being a resource document.

In conclusion, no impact would occur, and no further analysis of this issue is warranted in the EIR.

- g) **No Impact.** Based on a review of the San Diego County Safety Element and the Department of Forestry and Fire Protection Maps (CAL FIRE), the Plan Area is located within very high, high, and moderate Fire Hazard Severity Zones in Local, State, and Federal Responsibility Areas, as shown in **Figure 4, Fire Hazard Severity Zones** (San Diego County 2021, CAL FIRE 2023). Vehicles and mechanical equipment operating within and near vegetation within the Plan Area during habitat restoration, maintenance, or monitoring activities could have the potential to increase the risk of wildland fires due to accidental ignition of fuel sources from exhaust systems, electrical sparks/arcs, or construction worker activities. However, the North County Plan would incorporate vegetation management measures to address fire safety including vegetation thinning, fire suppression, controlled burns, as well as methods including hand thinning, controlled ignitions, creating fire lines, mowing, and water or retardant drops (San Diego County 2009). The North County Plan would also facilitate wildland fire hazard management activities such as abatement of combustible/flammable natural vegetation surrounding or adjacent to existing or future structures that must meet the current and applicable County Ordinances and ordered by the Fire Marshall. Implementation of fire hazard management and compliance with current and applicable County Ordinances would reduce the potential for the North County Plan to result in a significant risk of loss, injury, or death involving wildlife fires. Any future discretionary project that is located within the Plan Area boundaries would be subject to CEQA and further environmental review and would be required to comply with all applicable fire codes and building code standards. Therefore, no impact would occur, and no further analysis of this issue is warranted in the EIR.



Path: U:\GIS\GIS\Projects\2022\20220303\_05\_North\_County\_EIR\_EIS\03\_Project\ER\_EIS\aprx\_Fig4\_FireHazardSeverity\_Jackson 12102024



SOURCE: ESA, 2024; San Diego County, 2024.

North County Plan IS

**Figure 4**  
Fire Hazard Severity Zone



## References

- San Diego County, 2009. Draft North County Plan, Appendix G Framework Resource Management Plan. Available online at: <https://www.sandiegocounty.gov/content/dam/sdc/pds/mscp/docs/AppendixGFRMP.pdf>, accessed February 18, 2025.
- San Diego County, 2011. General Plan Noise Element. Available online at: <https://www.sandiegocounty.gov/content/dam/sdc/pds/gpupdate/docs/GP/NoiseElement.pdf>, accessed November 8, 2024.
- San Diego County, 2021. General Plan Safety Element. Available online at: <https://www.sandiegocounty.gov/content/dam/sdc/pds/gpupdate/SafetyElement-Aug2021.pdf>, accessed November 8, 2024.
- San Diego County, 2022. Operational Area Emergency Operations Plan. September 2022. Available online at: [https://www.sandiegocounty.gov/content/dam/sdc/oes/emergency\\_management/plans/op-area-plan/2022/EOP2022\\_Executive%20Summary.pdf](https://www.sandiegocounty.gov/content/dam/sdc/oes/emergency_management/plans/op-area-plan/2022/EOP2022_Executive%20Summary.pdf), accessed December 10, 2024.
- San Diego County, 2023. Multi-Jurisdictional Hazard Mitigation Plan. 2023. Available online at: [https://www.sandiegocounty.gov/content/dam/sdc/oes/emergency\\_management/HazMit/2023/MJHMP\\_SD%20County%20Base%20Plan%202023.pdf](https://www.sandiegocounty.gov/content/dam/sdc/oes/emergency_management/HazMit/2023/MJHMP_SD%20County%20Base%20Plan%202023.pdf), accessed December 10, 2024.
- CAL FIRE, 2023. State Responsibility Area Fire Hazard Severity Zones Map. Available online at: [https://34c031f8-c9fd-4018-8c5a-4159cdff6b0d-cdn-endpoint.azureedge.net/-/media/osfm-website/what-we-do/community-wildfire-preparedness-and-mitigation/fire-hazard-severity-zones/fire-hazard-severity-zones-map-2022/fire-hazard-severity-zones-maps-2022-files/fhsz\\_county\\_sra\\_11x17\\_2022\\_sandiego\\_2.pdf](https://34c031f8-c9fd-4018-8c5a-4159cdff6b0d-cdn-endpoint.azureedge.net/-/media/osfm-website/what-we-do/community-wildfire-preparedness-and-mitigation/fire-hazard-severity-zones/fire-hazard-severity-zones-map-2022/fire-hazard-severity-zones-maps-2022-files/fhsz_county_sra_11x17_2022_sandiego_2.pdf), accessed November 8, 2024.

## Hydrology and Water Quality

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
<b>X. HYDROLOGY AND WATER QUALITY —</b> 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"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) 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 surfaces, in a manner which would:				
i) result in substantial erosion or siltation on- or off-site;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv) impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

## Discussion

- a) **Less Than Significant Impact.** The Plan Area contains a safe and reliable supply of hydrologic resources such as reservoirs, aquifers, streams, rivers, lakes, and groundwater (San Diego County 2011). Although the North County Plan does not propose development that would result in waste discharge or substantially degrade surface or groundwater quality, Plan-related habitat restoration, maintenance, and monitoring activities would include the operation of mechanical equipment and vehicles traveling to and from the Plan Area, which would have the potential to release petroleum-based pollutants and soil and sediment that could enter receiving water bodies. In addition, such restoration, maintenance, and monitoring activities would utilize herbicides and pesticides during site clearing or vegetation removal but such materials would be used in small, localized amounts and the North County Plan would adhere to federal and state laws to ensure safe transport use, storage, and disposal of such materials. Nonetheless, in compliance with established water quality regulations, including the NPDES General Construction Permit and the County's LID requirements, such activities would be performed in a manner to limit waste discharge that would reduce the potential to violate a water quality standard or waste discharge requirement, thus the North County Plan would not the potential to result in substantial waste

discharges that could violate water quality standards. Adherence to state and federal regulations and compliance with the NPDES General Construction Permit and the County's LID requirements, the North County Plan would not have the potential to violate water quality standards or waste discharge requirements. Therefore, impacts would be less than significant, and no further analysis of this issue is warranted in the EIR.

- b) **Less Than Significant Impact.** As discussed above, the North County Plan contains various hydrologic resources throughout the Plan Area. The North County Plan does not propose development that would increase impervious surfaces in the Plan Area. Although the creation of the Preserve would include restoration, maintenance, and monitoring activities such as grade contouring, vegetation removal, compaction, native plantings, or minor alterations to designated trails, trailheads, and land, these activities would not be substantial as to alter surface water flows or impact groundwater conditions and groundwater recharge. Thus, the North County Plan would not have the potential to substantially decrease groundwater supplies or interfere substantially with groundwater recharge. Since the North County Plan does not propose development that would increase impervious surfaces, and the Preserve would primarily remain as vegetation, it is anticipated that the North County Plan would not substantially decrease groundwater supplies or interfere with groundwater recharge, thus not impeding sustainable groundwater management of the basin. Therefore, impacts would be less than significant, and no further analysis of this issue is warranted in the EIR.
- c.i) **Less Than Significant Impact.** The North County Plan does not propose development and thus would not introduce impervious surfaces to the Plan Area. However, restoration, maintenance, and monitoring activities may include minor alterations to Preserve land that could alter existing drainage patterns or a course of a stream or river. In addition, such restoration, maintenance, and monitoring activities would also include site clearing, grading, and vegetation removal which could increase erosion in the Plan Area. As discussed in Section VII, *Geology and Soils*, such activities would be performed in a manner to limit erosion and measures such as replanting and reseeding would be implemented for erosion control that would further reduce the potential for erosion or the loss of topsoil. Although the restoration, maintenance, and monitoring activities may increase overall ground disturbance, applicable erosion control measures would be implemented to ensure that impacts remain less than significant. Therefore, impacts would be less than significant, and no further analysis of this issue is warranted in the EIR.
- c.ii) **Less Than Significant Impact.** The North County Plan does not propose development that would increase the rate or amount of surface runoff causing flooding in the Plan Area. However, restoration, maintenance, and monitoring activities may include minor alterations to Preserve land that could increase the rate or amount of surface runoff in the Plan Area. As discussed in greater detail in Response "X.d" below, portions of the Plan Area are located in a flood hazard zone. Nonetheless, the North County Plan would comply with the NPDES General Construction Permit to address surface runoff to reduce potential impacts related to on- or -off-site flooding. Thus, the North County Plan would not substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site, thus impacts would be less than significant. Therefore, no further analysis of this issue is warranted in the EIR.

- c.iii) **Less Than Significant Impact.** As discussed in Response “a” above, restoration, maintenance, and monitoring activities may include minor alterations to Preserve land that could increase the rate or amount of surface runoff in the Plan Area. However, the North County Plan would comply with the NPDES Construction General Permit and the County’s LID requirements, reducing the potential for runoff water to exceed the capacity of existing or planned stormwater drainage systems or contribute substantial additional sources of polluted runoff. Compliance with the NPDES Construction General Permit and the County’s LID requirements would reduce impacts, and thus the North County Plan is not anticipated to significantly affect runoff water management systems. Therefore, impacts would be less than significant, and no further analysis of this issue is warranted in the EIR.
- c.iv) **Less Than Significant Impact.** As discussed above, restoration, maintenance, and monitoring activities could include minor (localized) modifications to existing drainage patterns or alteration of existing drainages, which would only be undertaken to improve the natural function of the drainage and associated habitat to support biological resources. The nature of these modifications would be very limited and would not have the potential to result in substantial alteration of the site drainage patterns that could cause obstructing natural flood paths and redirecting water flow to other areas lacking sufficient hydraulic capacity. Since the amount of land altered as part of restoration activities under the Plan would be very limited, as the intent of the Plan is to preserve land (with modifications only where necessary to achieve desired habitat quality and function), implementation of the North County Plan is not expected to have the potential to impede or redirect flood flows. Therefore, impacts would be less than significant, and no further analysis of this issue is warranted in the EIR.
- d) **Less Than Significant Impact.** According to the San Diego County General Plan Safety Element, Figure S-5, every community or subregion in the unincorporated County has studied areas subject to flood inundation (San Diego County 2021). The Plan Area is subject to a 100-year floodplain (1% annual chance of flooding) and 100-year floodway (1% chance of being equaled or exceeded in any given year) (San Diego County 2021). Furthermore, while no portion of the Plan Area is located in a tsunami hazard area, several open reservoirs, channels, and lakes are located within the Plan Area that could be subject to seiche effects during a seismic event. However, as discussed in Section IX, *Hazards and Hazardous Materials*, the North County Plan would include the use of herbicides and pesticides during maintenance and monitoring activities and would not create a significant hazard to the public or the environment because such materials would be used in small, localized amounts and in accordance with applicable regulations. Thus, in the event of a seiche or flooding within the Plan Area, it is anticipated that the North County Plan would not have the potential to risk the release of pollutants due to project inundation in flood hazard zones. Therefore, impacts would be less than significant, and no further analysis of this issue is warranted in the EIR.
- e) **Less Than Significant Impact.** As discussed above in Response “X.b”, the North County Plan would not result in potentially significant impacts to groundwater recharge. Furthermore, the proposed restoration, maintenance, and monitoring activities would not have the potential to release pesticides, herbicides, and petroleum-based pollutants in the environment as the North County Plan would comply with federal and state regulations pertaining to the use, handling, and



disposal of such materials that could enter water bodies and impact water quality standards. Since the North County Plan would not impede groundwater recharge, and the release of pollutants would adhere to state and federal regulations, the North County Plan would not have the potential to conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. Therefore, impacts would be less than significant, and no further analysis of this issue is warranted in the EIR.

## References

- San Diego County, 2011. General Plan Chapter 5 Conservation and Open Space Element. Available online at:  
<https://www.sandiegocounty.gov/content/dam/sdc/pds/gpupdate/docs/GP/ConservationandOpenSpace.pdf>, accessed November 12, 2024.
- San Diego County, 2021. General Plan Safety Element. Available online at:  
<https://www.sandiegocounty.gov/content/dam/sdc/pds/gpupdate/SafetyElement-Aug2021.pdf>, accessed November 11, 2024.
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<https://www.sdcwa.org/your-water/local-water-supplies/groundwater/>, accessed November 12, 2024.
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## Land Use and Planning

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
<b>XI. LAND USE AND PLANNING —</b> Would the project:				
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

## Discussion

- a) **No Impact.** The North County Plan would create large, connected preserve areas for the protection and conservation of Covered Species through the acquisition of land by private and public entities while streamlining the land use permitting process. As discussed in the *Project Description*, the North County Plan encompasses the northwestern unincorporated areas of San Diego County, totaling 699,411 acres. The North County Plan does not propose development that would introduce new infrastructure such as major roadways, water supply systems, or utilities to the area, which could physically divide an established community. Therefore, no impact would occur, and no further analysis of this issue is warranted in the EIR.
- b) **Potentially Significant Impact.** The North County Plan proposes to create large, connected preserve areas in the Plan Area through the acquisition of land, which could conflict with a land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Since the proposed amount of land to be acquired is unknown at the time of this Initial Study, adoption of the North County Plan has the potential to conflict with an adopted land use plan, policy, or regulation. Therefore, impacts would be potentially significant, and further analysis of this issue is warranted in the EIR.

## References

N/A

## Mineral Resources

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
<b>XII. MINERAL RESOURCES —</b> 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

## Discussion

- a) **Potentially Significant Impact.** According to the San Diego County General Conservation and Open Space Element, the Plan Area contains lands designed as MRZ-2 (Resource present) and MRZ-3 (Resource potentially present) (San Diego County 2011). In addition, the Plan Area contains study areas with potentially important mineral resources (DOC 2022). As discussed, the North County Plan would create large, connected preserve areas through the acquisition of land throughout the Plan Area. The acquisition of land has the potential to convert existing land uses to preserve areas, which would result in the loss of availability of a known mineral resource within the Plan Area. Since the proposed amount of land to be acquired is unknown at the time of this Initial Study, adoption of the North County Plan has the potential to 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. Therefore, impacts would be potentially significant, and further analysis of this issue is warranted in the EIR.
- b) **Potentially Significant Impact.** As discussed above, the Plan Area contains lands where mineral resources could/are present (San Diego County 2011; DOC 2022). The acquisition of land to create large, connected preserve areas would result in the loss of availability of a locally-important mineral resource. Since the proposed amount of land to be acquired is unknown at the time of this Initial Study, adoption of the North County Plan has the potential to 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. Therefore, impacts would be potentially significant, and further analysis of this issue is warranted in the EIR.

## References

San Diego County, 2011. General Plan Chapter 5 Conservation and Open Space Element. Available online at:  
<https://www.sandiegocounty.gov/content/dam/sdc/pds/gpupdate/docs/GP/ConservationandOpenSpace.pdf>, accessed November 11, 2024.

DOC, 2022. Mineral Land Classification. Available online at:  
<https://maps.conservation.ca.gov/cgs/informationwarehouse/index.html?map=mlc>, accessed November 11, 2024.

## Noise

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
<b>XIII. NOISE</b> — 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Generation of excessive groundborne vibration or groundborne noise levels?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

## Discussion

- a) **Potentially Significant Impact.** The North County Plan does not propose development within the Plan Area; however, adoption of the Plan would result in restoration, maintenance, and monitoring activities that could result in substantial maintenance-related activities and vehicle trips that generate noise throughout the Plan Area. During maintenance and monitoring activities, the use of equipment by monitors and the use of maintenance vehicles traveling to and from the Plan Area would generate noise in a short-term basis. In addition, activities such as site clearing, grading, and vegetation removal would also generate temporary noise throughout the Plan Area. These restoration, maintenance and monitoring activities could generate a temporary increase in ambient noise levels in excess of applicable standards for nearby sensitive receptors in various communities throughout the San Diego County. Thus, the North County Plan has the potential to generate a substantial temporary or permanent increase in ambient noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. Therefore, impacts would be potentially significant, and further analysis of this issue is warranted in the EIR.
- b) **Potentially Significant Impact.** The North County Plan does not propose development that would generate temporary groundborne noise and vibration associated with construction activities. However, restoration, maintenance, and monitoring activities would require the use of medium- to heavy-vehicles and/or equipment that would generate temporary noise and vibration. Since the specific equipment required for restoration, maintenance, and monitoring activities is unknown at the time of this Initial Study, adoption of the North County Plan has the potential to generate excessive groundborne noise and vibration in the preserve areas and adjacent to sensitive receptors, which would create a significant environmental impact. Therefore, impacts would be potentially significant, and further analysis of this issue is warranted in the EIR.
- c) **Potentially Significant Impact.** As discussed in *Hazards and Hazardous Materials*, the North County Plan encompasses the northwestern portion of the County, which contains various private

airports (San Diego County 2011). The North County Plan does not propose development that would place people or habitable structures in proximity to an airport or private airstrip. However, the acquisition of land and the conversion of land uses to preserve areas has the potential to place sensitive receptors, such as the Covered Species, in proximity to an airport or private airstrip. Thus, adoption of the North County Plan has the potential to expose sensitive communities and habitats to excessive airport- or aircraft-related noise levels. Therefore, impacts would be potentially significant, and further analysis of this issue is warranted in the EIR.

## References

San Diego County, 2011. General Plan Noise Element. Available online at:  
<https://www.sandiegocounty.gov/content/dam/sdc/pds/gpupdate/docs/GP/NoiseElement.pdf>,  
accessed November 11, 2024.

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## Population and Housing

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
<b>XIV. POPULATION AND HOUSING —</b> 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"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

## Discussion

- a) **Less Than Significant Impact.** The North County Plan does not propose development that would result in the generation of substantial population growth. The restoration, maintenance, and monitoring activities proposed in the North County Plan would generate jobs, but this addition would be unlikely to generate a substantial increase in population for the northwestern portion of the County. The North County Plan is thus not expected to induce substantial direct or indirect population and employment growth within the Plan Area. Therefore, impacts would be less than significant, and no further analysis of this issue is warranted in the EIR.
- b) **No Impact.** The Plan Area encompasses the northwestern unincorporated areas of San Diego County and various unincorporated areas and the cities of Fallbrook, Oceanside, Vista, Carlsbad, Encinitas, Escondido, and San Diego, along with County-owned or County-managed lands. The North County Plan does not propose development but would create preservation areas within the Plan Area. However, the preservation areas would not displace population or housing located within the Plan Area. Adoption of the North County Plan would not displace people or housing that would necessitate developed housing elsewhere. Therefore, no impact would occur, and no further analysis of this issue is warranted in the EIR.

## References

N/A

## Public Services

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
<b>XV. PUBLIC SERVICES —</b>				
a) Would the project 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 objectives for any of the following public services:				
i) Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii) Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii) Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iv) Parks?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
v) Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

## Discussion

- a.i) **Less Than Significant Impact.** Based on a review of the San Diego County Safety Element, the Plan Area is located within Local, State, and Federal Responsibility Areas where fire hazards present a high-level threat of person injury and property damage (San Diego County 2021). The San Diego County Fire Protection District (County Fire) and the California Department of Forestry and Fire Protection (CAL FIRE) provide fire protection and emergency medical services to communities in the unincorporated areas of San Diego County (San Diego County 2023). As discussed, the North County Plan does not propose development that would expose people or structures to fire hazards. The North County Plan focuses primarily on protecting and managing habitats for endangered or at-risk species. The North County Plan would address issues like habitat preservation, species management, and minimizing impacts from development as part of the plan implementation. Although the North County Plan would include restoration, maintenance, and monitoring activities, these are not activities that typically require frequent or increased fire protection services. Thus, the North County Plan would not require a substantial increase demand in fire protection services or require new or expanded fire protection facilities in the Plan Area. Therefore, impacts would be less than significant, and no further analysis of this issue is warranted in the EIR.
- a.ii) **Less Than Significant Impact.** The San Diego County Sheriff's Department (SDSD) and contracted cities provide law enforcement services to unincorporated areas of the County and to certain cities under contract (San Diego County 2021). As discussed in Section XIV, *Population and Housing*, the North County Plan would not generate substantial population growth as no development is proposed. Restoration, maintenance, and monitoring activities during vegetation removal and staging could require law enforcement services to ensure safety and manage traffic flow, however such activities would be temporary in nature and would not be of the magnitude to require a substantial increase demand for law enforcement services. Since the North County Plan would require minimal demand for law enforcement services, the North County Plan would not have the potential to result in substantial adverse physical impacts associated with the provision

of new or physically altered law enforcement facilities, need for new or physically altered law enforcement facilities, the construction of which could cause significant environmental impacts. Therefore, impacts would be less than significant, and no further analysis of this issue is warranted in the EIR.

- a.iii) **No Impact.** The North County Plan does not propose development that would induce a substantial population or employment growth that would entail constructing or altering government facilities like schools. Since the North County Plan does not propose specific land development, it would not adversely affect the environment and does not necessitate new or significantly altered school facilities. Therefore, no impact would occur, and no further analysis of this issue is warranted in the EIR.
- a.iv) **Potentially Significant Impact.** The North County Plan proposes to create large, connected preserve areas through the acquisition of land, which could convert publicly accessible open space areas to preserve areas. Preserve areas, as defined by the County, aim to protect biological, cultural, historical resources, as well as community character, and to make these resources available for public recreation opportunities; however, public access can be limited according to the sensitivity of the resources (San Diego County 2011). Since the proposed amount of land to be acquired is unknown at the time of this Initial Study, adoption of the North County Plan has the potential to result in substantial adverse physical impacts associated with the provision of new or physically altered park and open space facilities, need for new or physically altered parks and open space facilities, the construction of which would cause significant environmental impacts. Therefore, impacts would be potentially significant, and further analysis of this issue is warranted in the EIR.
- a.v) **No Impact.** The North County Plan does not propose development that would induce a substantial population or employment growth that would entail constructing or altering other government facilities like libraries. Since the North County Plan does not propose specific land development, it would not adversely affect the environment and does not necessitate new or significantly altered libraries. Therefore, no impact would occur, and no further analysis of this issue is warranted in the EIR.

## References

- San Diego County, 2021. General Plan Safety Element. Available online at:  
<https://www.sandiegocounty.gov/content/dam/sdc/pds/gpupdate/SafetyElement-Aug2021.pdf>,  
accessed November 11, 2024.
- San Diego County, 2011. General Plan Chapter 5 Conservation and Open Space Element. Available  
online at:  
<https://www.sandiegocounty.gov/content/dam/sdc/pds/gpupdate/docs/GP/ConservationandOpenSpace.pdf>,  
accessed November 11, 2024.
- San Diego County, 2023. San Diego County Fire Protection District Ground Ambulance Service Areas  
and Fire Stations. Available online at:  
[https://www.sandiegocounty.gov/content/dam/sdc/sdcfa/images/ambulance-services/Ground\\_Ambulance\\_Areas\\_SDU\\_Stations.pdf](https://www.sandiegocounty.gov/content/dam/sdc/sdcfa/images/ambulance-services/Ground_Ambulance_Areas_SDU_Stations.pdf),  
accessed November 11, 2024.
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## Recreation

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
<b>XVI. RECREATION —</b>				
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

## Discussion

- a) **Potentially Significant Impact.** The North County Plan would create preserved areas that may convert existing publicly accessible open space areas used for outdoor recreation to preserve land with restricted access, thereby potentially creating additional demands on parks and recreational facilities in other portions of the County. Therefore, impacts would be potentially significant, and further analysis of this issue is warranted in the EIR.
- b) **Potentially Significant Impact.** The North County Plan proposes to create large, connected preserve areas through the acquisition of land which would convert land uses to preserve areas. The conversion of existing publicly accessible open space areas used for outdoor recreation to preserve land with restricted access, could create trigger the need for new or expanded parks and recreational facilities in the Plan Area. Therefore, impacts would be potentially significant, and further analysis of this issue is warranted in the EIR.

## References

N/A

## Transportation

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
<b>XVII. TRANSPORTATION —</b> Would the project:				
a) Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

## Discussion

- a) **Potentially Significant Impact.** The North County Plan would involve habitat restoration and routine maintenance and monitoring activities, which has the potential to result in substantial vehicle trips from maintenance vehicles traveling to and from the Plan Area based on a weekly or monthly basis. Since the transportation analysis is limited at the time of this Initial Study, adoption of the North County Plan has the potential to conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. Therefore, impacts would be potentially significant, and further analysis of this issue is warranted in the EIR.
- b) **Potentially Significant Impact.** Senate Bill (SB) 743, which went into effect in January 2014, requires the Governor's Office of Planning and Research to change the way public agencies evaluate transportation impacts of projects under CEQA. Under SB 743, the focus of transportation analysis has shifted from driver delay, typically measured by traffic level of service (LOS), to a new measure that better addresses the state's goals on reduction of GHG emissions. This new measure evaluates transportation impacts based on Vehicle Miles Traveled (VMT), which aims to promote the state's goal of reducing GHG emissions and traffic-related air pollution, encouraging the development of a multi-modal transportation system, and providing clean, efficient transportation methods. CEQA Guidelines Section 1564.3 states that vehicle miles traveled (VMT) is the most appropriate measure of transportation impacts, replacing LOS. As discussed, the North County Plan would involve habitat restoration and routine maintenance and monitoring activities, which are anticipated to result in vehicle trips from construction and maintenance vehicles traveling to and from the Plan Area either temporarily during construction activities, or on an ongoing (weekly or monthly) basis. Adoption of the North County Plan has the potential to conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b). Therefore, impacts would be potentially significant, and further analysis of this issue is warranted in the EIR.

- c) **Less Than Significant Impact.** Restoration, maintenance, and monitoring would include site clearing, grading, vegetation removal, native plantings, and other related activities. Such activities may temporarily decrease road access and result in temporary road closures involving a variety of equipment to ensure safety and manage traffic flow effectively such as traffic cones, barricades, warning signs, traffic signals, reflective tape, etc. Temporary road closures and staging near roads due to site clearing, grading, and vegetation removal during restoration, maintenance, and monitoring activities would have the potential to result in an increase hazard due to geometric design features. However, any construction done near or on roads within the Plan Area would need to comply with applicable State and local regulations that address road design safety and maintaining emergency access during construction. Since these activities would be short-term and would not result in permanent changes to existing safety conditions for motor vehicles, pedestrians, or bicyclists and the North County Plan would comply with applicable regulations, it is expected that the North County Plan would not have the potential to substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment). Therefore, impacts would be less than significant, and no further analysis of this issue is warranted in the EIR.
- d) **No Impact.** The North County Plan does not propose development that would require the permanent closure of any local public or private streets and would not impede emergency vehicle access to the preserve areas and communities in the Plan Area. Therefore, no impact would occur, and no further analysis of this issue is warranted in the EIR.

## References

N/A

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## Tribal Cultural Resources

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
<b>XVIII. TRIBAL CULTURAL RESOURCES —</b>				
a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, 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 Section 5020.1(k), or	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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 Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

## Discussion

- a.i) **Potentially Significant Impact.** Assembly Bill (AB) 52 requires that prior to release of an EIR for a project, the lead agency shall consult with Native American Tribes to identify, evaluate, and mitigate impacts to tribal cultural resources if a Tribe has formally requested consultation (OPR 2017). At the time of this Initial Study, a record search of the Native American Heritage Commission (NAHC) Sacred Lands File (SLF) was not completed for the North County Plan, and thus no results are available. As such, to allow for compliance with AB 52, which mandates Native American consultation, further analysis of this issue is warranted in the EIR.
- a.ii) **Potentially Significant Impact.** As noted above, the North County Plan may have the potential to adversely affect tribal cultural resources in the proposed preserved areas and through the streamline process that encourages additional development in already developed areas. As such, in compliance with AB 52, which mandates Native American consultation if requested, further analysis of this issue is warranted in the EIR.

## References

Office of Planning and Research (OPR), 2017. Technical Advisory AB 52 and Tribal Cultural Resources in CEQA. Available online at: [https://lci.ca.gov/ceqa/docs/20200224-AB\\_52\\_Technical\\_Advisory\\_Feb\\_2020.pdf](https://lci.ca.gov/ceqa/docs/20200224-AB_52_Technical_Advisory_Feb_2020.pdf), accessed November 11, 2024.

## Utilities and Service Systems

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
<b>XIX. UTILITIES AND SERVICE SYSTEMS —</b> Would the project:				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

## Discussion

- a) **No Impact.** The North County Plan does not propose development that would necessitate the need for construction of new or expanded water, wastewater treatment, storm water drainage, electric power, natural gas, or telecommunication facilities. Any future discretionary project that is located within the Plan Area boundaries would be served by existing or future infrastructure and would be subject to CEQA and further environmental review. Since the North County Plan does not propose new land uses within the Plan Area, adoption of the North County Plan would not require new or updates to the existing electric power, natural gas, or telecommunication facilities nor would any new or expanded water, wastewater treatment, stormwater drainage, electric power, natural gas, or telecommunication facilities be required. Therefore, no impact would occur, and no further analysis of this issue is warranted in the EIR.
- b) **Less Than Significant Impact.** The North County Plan would not generate a substantial increase in demand for water as no development is proposed. However, restoration, maintenance, and monitoring activities would require incidental water supplies during grading, vegetation removal, and other site clearing as a form of dust control. In addition, the North County Plan would require water for irrigation to restore or enhance habitats within the Plan Area which would incrementally increase water demand. Water required for such activities would be provided via water trucks or recycled water pipelines (where available) and would not require a substantial increase in available water supplies since such water demands would be nearly negligible relative to the overall County-wide demand over the 30-year permit term of the North County Plan. Since the North County Plan would not require a substantial water demand for restoration, maintenance, and monitoring activities, impacts would be less than significant. Therefore, impacts would be less than significant, and no further analysis of this issue is warranted in the EIR.

- c) **No Impact.** The North County Plan does not propose development that would require wastewater services. Adoption of the North County Plan would not contribute to wastewater flows to wastewater systems located in the Plan Area. Therefore, no impact would occur, and no further analysis of this issue is warranted in the EIR.
- d) **Less Than Significant Impact.** Restoration, maintenance, and monitoring activities would include site clearing, grading, and vegetation removal that would generate green waste such as leaves, grass clippings, branches, shrubs, and tree trimmings. Although green waste would be generated during restoration, maintenance, and monitoring activities, the North County Plan would comply with proper management and recycling of vegetation trash thus reducing the volume of waste that ends up in landfills. In addition, the green waste generated by the North County Plan would not exceed the capacity of existing solid waste infrastructure or require new or expanded local infrastructure. Since the North County Plan would generate green waste and such waste would almost exclusively be recycled, the North County Plan would not generate excess waste, nor would it exceed the capacity of local infrastructure or otherwise impair the attainment of solid waste reduction goals. Therefore, impacts would be less than significant, and no further analysis of this issue is warranted in the EIR.
- e) **Less Than Significant Impact.** As discussed in Response “XIX.d” above, the North County Plan would generate green waste during restoration, maintenance, and monitoring activities including site clearing, grading, and vegetation removal. However, such waste would be recycled in compliance with federal, state, and local management and be consistent with reduction statutes and regulations. Therefore, impacts would be less than significant, and no further analysis of this issue is warranted in the EIR.

## References

N/A

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## Wildfire

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
<b>XX. WILDFIRE</b> — If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

## Discussion

- a) **No Impact.** As discussed in Section IX, *Hazards and Hazardous Materials*, Response “IX.f,” the North County Plan does not propose development and would not result in construction-related traffic along local roadways or highways or delay emergency vehicles traveling through the Plan Area. Adoption of the North County Plan would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. Therefore, no impact would occur, and no further analysis of this issue is warranted in the EIR.
- b) **No Impact.** As discussed in Section IX, *Hazards and Hazardous Materials*, Response “IX.g,” based on a review of the San Diego County General Plan Safety Element, the Plan Area is located within Local, State, and Federal Responsibility Areas (San Diego County 2021). Additionally, according to CAL FIRE, the Plan Area is located within Fire Hazard Severity Zones in State Responsibility Areas (SRA) (CAL FIRE 2023). In addition, restoration, maintenance, and monitoring activities would include vehicles operating within and adjacent to existing flammable vegetation throughout the Plan Area which would have the potential to exacerbate wildfire risks. However, the North County Plan includes wildland fire hazard management which would be consistent with applicable County Ordinances. More specifically, as noted in Chapter 6, Plan Implementation, of the Plan, each RMP will include fire management and protection measures that will minimize the risk of damage to habitats and natural communities from overly frequent or excessively hot fires. Preventative measures may include (but are not limited to) the following actions: vegetation management; the reintroduction of low-intensity prescribed fires to encourage fire-adapted species and discourage non-fire-adapted invasive species; working with local fire agencies to improve fire suppression preparedness and strategies to protect habitat during fire response; and incorporating public awareness programs into recreational plans and preserve management plans. Implementation of the fire hazard management and compliance with current

and applicable County Ordinances would reduce the potential for the North County Plan to exacerbate wildfire risks within the Plan Area. Since the North County Plan does not propose development and would implement wildland fire hazard management practices to reduce potential impacts resulting in wildfire risks, the North County Plan would not expose project occupants to wildfire risks. Therefore, no impact would occur, and no further analysis of this issue is warranted in the EIR.

- c) **No Impact.** The North County Plan does not propose development and would not require installation or maintenance of infrastructure that may exacerbate fire risk. Adoption of the North County Plan would not result in impacts related to fire risk due to installation or maintenance of associated infrastructure. Therefore, no impact would occur, and no further analysis of this issue is warranted in the EIR.
- d) **No Impact.** As discussed in *Geology and Soils*, no impacts to people or structures would occur due to significant geologic risks, including exposing people or structures to downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. Therefore, no impacts related to downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage would occur. Therefore, no impact would occur, and no further analysis of this issue is warranted in the EIR.

## References

- San Diego County, 2021. General Plan Safety Element. Available online at: <https://www.sandiegocounty.gov/content/dam/sdc/pds/gpupdate/SafetyElement-Aug2021.pdf>, accessed November 8, 2024.
- CAL FIRE, 2023. State Responsibility Area Fire Hazard Severity Zones Map. Available online at: [https://34c031f8-c9fd-4018-8c5a-4159cdff6b0d-cdn-endpoint.azureedge.net/-/media/osfm-website/what-we-do/community-wildfire-preparedness-and-mitigation/fire-hazard-severity-zones/fire-hazard-severity-zones-map-2022/fire-hazard-severity-zones-maps-2022-files/fhsz\\_county\\_sra\\_11x17\\_2022\\_sandiego\\_2.pdf](https://34c031f8-c9fd-4018-8c5a-4159cdff6b0d-cdn-endpoint.azureedge.net/-/media/osfm-website/what-we-do/community-wildfire-preparedness-and-mitigation/fire-hazard-severity-zones/fire-hazard-severity-zones-map-2022/fire-hazard-severity-zones-maps-2022-files/fhsz_county_sra_11x17_2022_sandiego_2.pdf), accessed November 8, 2024.
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## Mandatory Findings of Significance

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
<b>XXI. MANDATORY FINDINGS OF SIGNIFICANCE —</b>				
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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

## Discussion

- a) **Potentially Significant Impact.** As noted in Sections II, III, IV, V, VI, VIII, X, XI, XII, XIII, XV, XVI, XVII, and XVIII above, implementation of the North County Plan would have the potential to impact agricultural lands, reduce air quality, impact sensitive species and habitats, affect cultural resources, consume an excessive amount of energy, generate excessive GHG emissions, impact and reduce water quality, conflict with existing zoning, affect mineral resources in the Plan Area, generate long-term noise, require new or expanded public services and recreational facilities, generate additional vehicle trips, and impact known and/or undiscovered tribal cultural resources. As a result of this evaluation, it has been determined that the North County Plan would have potentially significant effects related to Agriculture and Forestry Resources, Air Quality, Biological Resources, Cultural Resources, Energy, GHG Emissions, Hydrology and Water Quality, Land Use and Planning, Mineral Resources, Noise, Public Services, Recreation, Transportation, and Tribal Cultural Resources. Therefore, further analysis of these issues is warranted in the EIR.
- b) **Potentially Significant Impact.** Implementation of the North County Plan would contribute to cumulatively considerable impacts. Potentially significant impacts are discussed throughout this Initial Study and cumulative effects will be evaluated for those topics that required further analysis in the EIR.
- c) **Potentially Significant Impact.** Environmental effects that may cause a potentially significant impact on human beings, either directly or indirectly, will be evaluated further in the EIR.

## References

N/A