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FEIR GLOBAL RESPONSES
GENERAL PLAN AMENDMENT CEQA IMPACTS ANALYSIS

A number of commenters asserted that the FEIR does not analyze the potential physical impacts to the environment resulting from the General Plan Amendment. This global response was prepared to address these issues.

CEQA requires an environmental document to analyze any project inconsistencies with general plan policies that could result in an environmental impact. The proper basis for such analysis is to compare the project with the existing general plan. (CEQA Guidelines § 15125(d).) Also, when a proposed project includes a general plan amendment, this means that the general plan amendment must be compared to the *existing physical conditions*. (*EPIC v. El Dorado*, 113 Cal.App.3d 350).

The project FEIR frames the General Plan consistency analysis at subchapter 1.4 under Environmental Setting, (See FEIR, Chapter 3.0; Appendix W) FEIR subchapter 1.4 provides the project Environmental Setting including the existing physical characteristics of the project site (site size, parcel allocation, land uses, built structures, topography, water resources, vegetation and habitat, and jurisdictional waters) as well its present regional context (defining highways, elevation, watershed, climate, surrounding development and densities, regional conservation plans) and it current land use planning context (current general plan land uses and both community plans). (FEIR, subchapter 1.4.) Chapters 2.0 and 3.0 measure project impacts and significance against the "existing physical conditions" described in subchapter 1.4 and the additional details provided within each resource discussion. A few examples where resource-specific details are provided include: subchapters 2.1.1.2, Existing Visual Resources, 2.2.1.3, Existing Air Quality, 2.4.1.2, Existing Agricultural Resources, and 2.5.1, Existing Conditions pertaining to Biological Resources. Maps showing the proposed land use planning changes are provided at Chapter 1.0.

The project includes 10 requests for exceptions to County Road Standards as part of this project and are described in Figures 1-4A and 1-4B. The purpose of the exceptions requests are to avoid impacts to surrounding properties and to support traffic-calming measures. All of the exceptions being requested for the roadway improvements were included as part of the project's circulation design and considered as a part of the analysis for each subject area discussion within the FEIR. The exceptions would be granted by the County where capacity and safety are not unduly affected. (FEIR, subchapter 2.3.2.3.) The proposed roadway exceptions would not affect road capacity. As detailed in Table 1-2 of Chaper 1.0 of the FEIR, 4 of the 10 proposed roadway exception requests would affect design speed. Two of those roads are internal to the project site.

Thus, the FEIR thoroughly presents analysis of any potential physical environmental impacts that would result from project approval and the concomitant amendment of the Regional Land Use Element Map to change the regional land use category from Semi-Rural to Village. The FEIR properly compares the proposed General Plan amendment to the *existing physical conditions* and in no credible way can be alleged to obscure disclosure of future physical impacts resulting from such amendment on the *existing physical environment*.

The project is also compared to the existing General and Community Plans as described above. (FEIR subchapter 1.4 provides the project Environmental Setting including the current land use

planning context (e.g., current General Plan land uses and both community plans, pp. 1-38.) For instance, in Appendix W, Bonsall Community Plan Policy LU-1.1.1 is analyzed against the project to determine whether the project would be consistent. Policy LU-1.1.1 requires development in the community to preserve the rural qualities of the area, minimize traffic congestion, and to not adversely affect the natural environment. Even though the project is not currently designated as Semi-Rural and the surrounding properties are also designated Semi-Rural and therefore the project would not change an existing "rural" regional category; the project would help to preserve the overall rural character of the communities. The project was determined to be consistent with this policy by looking at the sensitive biological and agricultural resources that it would preserve, the design features that would reduce visual effects along the project's perimeter, the project's use of buffers wider lots and grade separations, and its location of housing close to retail, services, schools, and jobs that would minimize traffic congestion. All of these project features were determined to contribute to the retention of the rural setting and lifestyle of the adjacent community. Further, by concentrating new housing in a compact form of development within a planned village setting, accessible to infrastructure and transportation; development pressure on areas that contain farmland or other rural areas would be reduced and would not, in turn, encourage such areas from being developed. As can be seen by this example, the analysis of the project's consistency with existing General and Community Plans looked at the details of the project and compared it with the policies found in these documents.

Appendix W compares the project to the existing General and Community plans to determine whether any inconsistency would result in an environmental impact. Although not required by CEQA, this matrix helps to avoid confusion by the public and the reviewing body by clearly showing the analytical trail concerning such comparisons. Still, an inconsistency between a proposed project and an applicable plan that does not result in a physical impact on the environment is actually a legal determination, not a CEQA one. Rather, CEQA is concerned only with whether the inconsistency could result in a physical impact on the environment. The aforementioned legal analysis should not be confused with CEQA's requirement to analyze any inconsistencies with an existing general plan that results in a physical impact to the environment.