

Attachment H – Environmental Documentation

ERRATA SHEET FOR THE DRAFT FINAL ENVIRONMENTAL IMPACT REPORT

LILAC HILLS RANCH PROJECT

PDS2012-3800-12-001 (GPA), PDS2012-3810-12-001 (SP), PDS2012-3600-12-003 (REZ), PDS2012-3100-5571 (TM), PDS2012-3100-5572 (TM), PDS2012-3300-12-005 (MUP), PDS2012-3500-12-018 (STP),
HLP XX-XXX LOG NO. 3910 12-02-003 (ER);
SCH NO. 2012061100

August 7, 2015

This Errata Sheet identifies changes to the Draft Environmental Impact Report (DEIR) for the Lilac Hills Ranch Ranch Project. This Errata Sheet identifies specific locations in the DEIR where changes have been made pursuant to Staff's recommendation for the Lilac Hills Ranch Project.

As part of Staff's recommendation, the following additional design measures were added to the Project Description and Table 1-3:

- Provide a 50-foot wide (setback) buffer with two rows of trees or similar vegetation around the perimeter of the project, including along the south side of West Lilac Road within the project site. The buffer shall include a style of landscape similar to that in the other agricultural buffers (e.g. orchard style plantings) required within the project. Any residential lots affected by this requirement can be relocated within the project. However, the overall number of dwelling units shall not exceed 1,746 and the type of dwelling unit (single-family detached) shall remain the same (like for like).
- Provide interim transit service (vanpool) between the community and the nearest transit stop off-site (SR-76 or Escondido) through the SANDAG iCommute program concurrently with Phase 1.
- Install electric vehicle charging stations as determined by Planning & Development Services.
- Pre-wire all single-family and multi-family residential buildings with electric vehicle (EV) supply equipment per CALGreen.

FINDINGS REGARDING SIGNIFICANT EFFECTS PURSUANT TO CEQA GUIDELINES SECTION 15091

LILAC HILLS RANCH PROJECT

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SCH NO. 2012061100

August 7, 2015

Pursuant to Section 21081 of the California Environmental Quality Act (CEQA) and Section 15091 of the CEQA Guidelines, the San Diego County Board of Supervisors makes the findings that are set forth below.

I. Findings Pursuant to CEQA Guidelines Section 15091(a)(1)

Pursuant to Section 15091(a)(1) of the CEQA Guidelines, the County finds that, for each of the following significant effects as identified in the FEIR, dated August 7, 2015, for the Lilac Hills Ranch Project (project) changes or alterations (mitigation measures) are feasible and have been required in, or incorporated into, the project which avoid or substantially lessen each of the significant environmental effects as identified in the FEIR. The significant effects (impacts) and mitigation measures are stated fully in the FEIR. The following are brief descriptions of the impacts and mitigation measures set forth in the FEIR and explanations of the rationale for this finding for each impact.

A. Air Quality Impacts

The project would adhere to local and state regulations and also includes additional design considerations that are incorporated in the Specific Plan. Ordinance compliance includes the requirement for all active grading areas are to be watered three times per day and the project's use of SDCAPCD compliant paints for architectural castings. Additional design considerations include the commitment that all construction equipment shall be primarily Tier III or higher; and the contractor shall use all available engineering controls, such as blasting cabinets and local exhaust ventilation (see FEIR Table 1-3 for additional details). Each of these measures will be implemented through the project's conditions of approval and conditions of approval in subsequent permits, such as tentative subdivision maps and Site Plans. However, as discussed in FEIR subchapter 2.2, even with implementation of these design considerations, construction emissions of $PM_{2.5}$ and PM_{10} would exceed applicable Significance Level Threshold (SLT) resulting in the following significant impacts for which mitigation measures would be required.

Impact AQ-2a: Construction emissions are projected to exceed the applicable SLTs for $PM_{2.5}$ during all construction phases.

Impact AQ-2b: Construction emissions are projected to exceed the applicable SLTs for PM_{10} during all construction phases.

Mitigation Measure M-AQ-2: This mitigation measure specified in the FEIR has been imposed upon the project as a condition of approval, requiring the following additional dust control measures to be implemented during project construction:

1. A "trackout" gravel bed shall be installed at every access point used during construction including every location off-road equipment transitions to paved surfaces. The gravel bed shall be 25 feet long and the width of the access point/roadway.
2. Chemical stabilizers shall be applied annually to all unpaved storage/maintenance yards, parking areas, and unpaved roads.
3. Vehicle speeds will be limited to 15 miles an hour or less and shall be randomly verified by radar enforcement.

Mitigation Measure M-AQ-4: This mitigation measure specified in the FEIR has been imposed upon the project as a condition of approval, requiring compliance with all permit conditions pertaining to the crushing equipment. Specifically, material to be crushed is required to be pre-watered prior to loading into the crusher, and the crusher's emissions opacity must be monitored once every 30 days of operation and an opacity limit of 20 percent as averaged over a six-minute period shall be maintained. Water shall be applied to crushed material to prevent dust plumes.

Mitigation Measure M-AQ-5: This mitigation measure specified in the FEIR has been imposed upon the project as a condition of approval, requiring blasting activities to adhere to permitting requirements of the California Division of Industrial Safety and the best management practices for control of fugitive dust from construction and demolition from blasting, such as wet drilling and wetting the surface area prior to blasting.

Mitigation Measure M-AQ-5a: This mitigation measure specified in the FEIR has been imposed upon the project as a condition of approval, requiring prior to the issuance of a grading permit and building permit, the applicant shall submit verification that a ridesharing program for the construction crew has been encouraged by the contractor. Evidence shall include copies of rideshare materials provided to employees and any incentives offered.

Impact AQ-2c: Construction emissions are projected to exceed the applicable SLTs for NO_x during Phase 1 and Phase 4 only.

Mitigation Measure M-AQ-3: This mitigation measure specified in the FEIR has been imposed upon the project as a condition of approval, requiring that, during construction of Phase 4, all construction activity shall be halted for the entire day that any blasting operation occurs, and only equipment required as part of the blasting operations, e.g., drill rig or equipment used to excavate and remove material, shall operate on the same day that blasting occurs.

Rationale: Notwithstanding the project's inclusion of the aforementioned best management practices criteria pollutant emissions would exceed the SLTs for PM₁₀ and NO_x (Impact AQ-2). Mitigation measures M-AQ1 through M-AQ-3 are required to reduce the significant impacts identified as AQ-2a, AQ-2b, and AQ-2c. Implementation of mitigation measure M-AQ-2 requires additional dust-control measures beyond standard dust and emission controls during grading operations. Mitigation measure M-AQ-3 requires stopping construction activities during blasting operations. Mitigation measure M-AQ-4 requires pre-watering of materials prior to loading into the crusher and applying water to crushed material to prevent dust plumes. Mitigation measure M-AQ-5 requires best management practices for control of fugitive dust from blasting materials. M-AQ-5a requires the applicant to submit verification that a ridesharing program for the construction crew has been encouraged by the contractor. Overall, implementation of M-AQ-2

through M-AQ-5a would reduce significant construction related impacts (Impacts AQ-2a, AQ-2b, AQ-2c) to less than significant.

Evidence Supporting CEQA Findings:

Substantial evidence to support the finding that Impacts AQ-2a, AQ-2b and AQ-2c would be reduced to less than significant levels with the implementation of mitigation is found within the administrative record pertaining to this FEIR. Please refer to the following document(s):

- FEIR subchapter 2.2- specifically ,subchapters 2.2.2.2, 2.2.4, 2.2.5, 2.2.6.2
- FEIR Appendix D, Air Quality Technical Report

B. Transportation/Traffic Impacts

1. Direct Impacts

As detailed in Section II, D Circulation Plan, of the Specific Plan, and included in FEIR Table 1-3, the project includes a Transportation Demand Management (TDM) program to foster alternative modes of transportation and reduce the number of trips generated by the project. The TDM would be implemented through project conditions of approval and Specific Plan compliance. However, as discussed in FEIR subchapter 2.3, even with implementation of a TDM, direct traffic impact would exceed applicable thresholds resulting in the following significant impacts, and mitigation measures would be required.

Existing Plus Project (Traffic Scenario A)

Impact TR-1: The project traffic would result in an increase in traffic along Gopher Canyon Road, between E. Vista Way and I-15 SB Ramps. Specifically, this roadway operates at an unacceptable level in the existing condition. Additional trips along this roadway segment would result in a significant impact and a reduction in the operation of the roadway because the project would add over 100 ADT to a County facility already operating at LOS F.

Impact TR-2: The project traffic would increase intersection delay at the intersection of E. Vista Way and Gopher Canyon Road. Specifically, this intersection operates at an unacceptable level in the existing condition. Additional project-related trips would result in a significant impact and the degradation of the operation of this intersection because it would add over a one-second delay to a County intersection operating at LOS F.

Mitigation Measure M-TR-1: This mitigation measure specified in the FEIR has been imposed upon the project as a condition of approval, requiring that prior to recordation of the Final Map associated with the 238th EDU of the Lilac Hills Ranch Specific Plan, the applicant or its designee shall install a dedicated right-turn lane at the westbound Gopher Canyon Road approach of the East Vista Way/Gopher Canyon Road intersection.

Rationale: Notwithstanding the project's inclusion of the aforementioned TDM program, mitigation measure M-TR-1 is required to reduce the significant impacts identified as TR-1 and TR-2. Implementation of mitigation measure M-TR-1 would improve traffic flow along Gopher Canyon Road between E. Vista Way and I-15 SB Ramps. As shown by the arterial analysis (see Appendix E, Table 5.6), the implementation of M-TR-1 would increase the average travel speed in the AM peak hour and maintain the PM peak hour travel average speed relative to the Existing Conditions. Thus, M-TR-1 would mitigate Impact TR-1 to below a level of significance.

The intersection analysis (see Appendix E, Table 5.7) shows that implementation of M-TR-1 would reduce the intersectional delay compared to the Existing Conditions, thereby mitigating the project's E. Vista Way/Gopher Canyon Road (Impact TR-2) impact to below a level of significance.

Existing Plus Project (Traffic Scenario B)

Impacts TR-1 and TR-2: See Existing Plus Project (Traffic Scenario A).

Existing Plus Project (Traffic Scenario C)

Impacts TR-1 and TR-2: See Existing Plus Project (Traffic Scenario A).

Impacts TR-3 and TR-4: See Section II, below.

Impact TR-5: The project traffic would result in an increase in traffic along West Lilac Road from Old Highway 395 to Main Street. Specifically, additional trips along this roadway segment would result in a significant impact and a reduction in the operation of the roadway because the project would add more than 100 trips to a County segment operating at LOS F.

Mitigation Measure M-TR-4: This mitigation measure specified in the FEIR has been imposed upon the project as a condition of approval, requiring that prior to recordation of the Final Map associated with the 929th EDU of the Lilac Hills Ranch Specific Plan, the applicant, or its designee, shall improve West Lilac Road between Old Highway 395 and Main Street to meet the General Plan Mobility Element classification of 2.2C, subject to exceptions as approved by the County.

Rationale: Notwithstanding the project's inclusion of the aforementioned TDM program, Mitigation measure M-TR-4 is required to reduce the significant impact identified as TR-5. Implementation of mitigation measure M-TR-5 would reduce the impact to less than significant because the road improvement would widen the road to a 2.2C road which would increase the capacity and allow the road to function at an acceptable LOS of D, consistent with the County standard.

Impact TR-6: The project traffic would result in an increase in traffic along E. Vista Way from Gopher Canyon Road to Osborne Street. Specifically, additional trips along this roadway segment would result in a significant impact and a reduction in the operation of the roadway because the project would add more than 100 trips to a County segment operating at LOS F.

Mitigation Measure M-TR-5: This mitigation measure specified in the FEIR has been imposed upon the project as a condition of approval, requiring that prior to recordation of the Final Map associated with the 476th EDU of the Lilac Hills Ranch Specific Plan, the applicant, or its designee, shall install a dedicated right-turn lane at the northbound E. Vista Way approach of the E. Vista Way/Gopher Canyon Road intersection.

Rationale: Notwithstanding the project's inclusion of the aforementioned TDM program, mitigation measure M-TR-5 is required to reduce the significant impact identified as TR-6. Implementation of mitigation measure M-TR-5 would reduce the impact to less than significant. M-TR-5 requires the provision of a dedicated right-turn lane at the northbound approach of Gopher Canyon Road/East Vista Way intersection (see Appendix E, Figure 5-4). As shown in the Arterial Analysis implementation of this mitigation measure would improve the AM/PM peak

hour average travel speed at E. Vista Way between Gopher Canyon Road and Osborne Street, relative to the Existing Conditions (see Appendix E, Table 5.23). Thus, mitigation measure M-TR-5 would mitigate Impact TR-6 to below a level of significance.

Impact TR-7: The project traffic would increase intersection delay at intersection of Old Highway 395 and West Lilac Road. Specifically, project-related trips would result in the degradation of the operation of this intersection because the additional traffic generated by Traffic Scenario C would result in the addition of over 5 trips to this County unsignalized intersection operating at LOS F.

Mitigation Measure M-TR-6: This mitigation measure specified in the FEIR has been imposed upon the project as a condition of approval, requiring that prior to recordation of the Final Map associated with the 585th EDU of the Lilac Hills Ranch Specific Plan, the applicant, or its designee shall install a traffic signal at the Old Highway 395/West Lilac Road intersection and construct a left-turn lane at the westbound West Lilac Road approach to the Old Highway 395/West Lilac Road intersection.

Rationale: Notwithstanding the project's inclusion of the aforementioned TDM program, mitigation measure M-TR-6 is required to reduce the significant impact identified as TR-7. Implementation of mitigation measure M-TR-6 would provide steady regulation of traffic flow reducing intersection delay by allowing traffic to flow steadily without interference from cross traffic. This would improve operations to acceptable levels (see Appendix E, Table 5.28). Thus, implementation of M-TR-4 would reduce the direct Impact TR-7 to below a level of significance.

Existing Plus Project (Traffic Scenario D)

Impacts TR-1 and TR-2: See Existing Plus Project (Traffic Scenario A).

Impacts TR-3 and TR-4: See Existing Plus Project (Traffic Scenario B).

Impacts TR-5, TR-6, and TR-7: See Existing Plus Project (Traffic Scenario C).

Impact TR-8: The project traffic would increase intersection delay at the intersection of Old Highway 395 and Circle R Drive. Specifically, project-related trips would result in the degradation of the operation of this intersection because the additional traffic generated by Traffic Scenario D would result in the addition of over 5 trips to this County unsignalized intersection operating at LOS F.

Mitigation Measure M-TR-7: This mitigation measure specified in the FEIR has been imposed upon the project as a condition of approval, requiring that prior to recordation of the Final Map associated with the 1,220th EDU of the Lilac Hills Ranch Specific Plan, the applicant, or its designee, shall install a traffic signal at the Old Highway 395/Circle R Drive intersection.

Rationale: Notwithstanding the project's inclusion of the aforementioned TDM program, mitigation measure M-TR-7 is required to reduce the significant impact identified as TR-8. Implementation of mitigation measure M-TR-7 would improve roadway operations through the installation of traffic signals. The traffic signal would provide steady regulation of traffic flow reducing intersection delay and improving intersection operations to acceptable levels (see Appendix E, Table 5.32). Thus, implementation of M-TR-7 would reduce the direct Impact TR-8 to below a level of significance.

Existing Plus Project (Traffic Scenario E)

Impacts TR-1 and TR-2: See Existing Plus Project (Traffic Scenario A).

Impacts TR-3 and TR-4: See Existing Plus Project (Traffic Scenario B).

TR-5, TR-6, and TR-7: See Existing Plus Project (Traffic Scenario C).

TR-8: See Existing Plus Project (Traffic Scenario D).

Impact TR-9: The project traffic would result in an increase in traffic along E. Vista Way from SR-76 and Gopher Canyon Road.

See mitigation measure M-TR-1, above.

See mitigation measure M-TR-5, above.

Rationale: Notwithstanding the project's inclusion of the aforementioned TDM program, mitigation measures M-TR-1 and M-TR-5 are required to reduce the significant impact identified as TR-9. These mitigation measures would occur in the Existing plus Project (Traffic Scenario A) and Existing plus Project (Traffic Scenario C), respectively. As shown by the arterial analysis (see Appendix E, Table 5.40), the implementation of this mitigation would increase the travel speed along this segment relative to the Existing Conditions. This would result in an increase of traffic flow through this segment and improve operations relative to the Existing Conditions. Thus, M-TR-1 and M-TR-5 would mitigate Impact TR-9 to below a level of significance.

Evidence Supporting CEQA Findings:

Substantial evidence to support the finding that Impacts TR-1 through TR-9 would be reduced to less than significant levels with the implementation of mitigation is found within the administrative record pertaining to this FEIR. Please refer to the following document(s):

- FEIR subchapter 2.3- specifically ,subchapters 2.3.2.1, 2.3.4, 2.3.5, 2.3.6.1
- FEIR Appendix E, Traffic Impact Study

2. Cumulative Impacts - Existing Plus Cumulative Projects Plus Project Scenario

As discussed above, a TDM program as outlined in the Specific Plan and FEIR Table 1-3 would be implemented to reduce project related traffic through the facilitation of alternative transit opportunities. However, as discussed in FEIR subchapter 2.3, even with implementation of a TDM, cumulative traffic impacts would exceed applicable thresholds resulting in the following significant impacts and additional mitigation measures would be required.

Impact TR-10: In the cumulative condition, West Lilac Road from Old Del Rey between Old River Road and West Lilac Road would operate at LOS F. The project would add more than 100 daily trips, contributing to this significant cumulative impact.

See mitigation measure M-TR-4, above.

See mitigation measure M-TR-6, above.

Rationale: Notwithstanding the project's inclusion of the aforementioned TDM program, mitigation measures M-TR-4 and M-TR-6 are required to reduce the significant impact identified as TR-10. These mitigation measures would occur in the Existing plus Project (Traffic Scenario C). M-TR-4 requires improvement to 2.2C classification and M-TR-6 requires an intersection signalization and addition of a left-turn lane at the westbound approach to the West Lilac Road/Old Highway 395 intersection. The arterial analysis shows that the West Lilac Road segment between Old Highway 395 and Main Street would operate acceptably after the implementation of M-TR-4 and M-TR-6 (see Appendix E, Table 6.7). In addition, the project includes roundabouts along this segment that increase the capacity of the intersections beyond the traffic expected in the cumulative plus project condition. Thus, TR-10 would be mitigated to below a level of significance by M-TR-4 and M-TR-6.

Impact TR-11: In the cumulative condition, Camino Del Rey between Old River Road and West Lilac Road would be degraded to operate at LOS E. The project would add more than 200 daily trips, contributing to a significant cumulative impact.

Impact TR-13: In the cumulative condition, Gopher Canyon Road between Little Gopher Canyon Road would be degraded to operate at LOS F. The project would add more than 100 daily trips, contributing to a significant cumulative impact.

Impact TR-14: In the cumulative condition, E. Vista Way between SR-76 and Gopher Canyon Road would operate at LOS F. The project would add more than 100 daily trips contributing to a significant cumulative impact.

Impact TR-15: In the cumulative condition, E. Vista Way, between Gopher Canyon Road and Osborne Street would be degraded to operate at LOS F. The project would add more than 100 daily trips, contributing to a significant cumulative impact.

Impact TR-18: In the cumulative condition, Cole Grade Road, between Fruitvale Road and Valley Center Road would be degraded to operate at LOS E. The project would add more than 200 daily trips, contributing to a significant cumulative impact.

Mitigation Measure M-TR-8: This mitigation measure specified in the FEIR has been imposed on the project as a condition of approval, requiring that prior to issuance of any building permit for new structures within the Lilac Hills Ranch Specific Plan, the applicant or its designee, shall pay all applicable fees to the County TIF Program, which should be updated to include the changes to the Land Use and Mobility Elements proposed by the project.

Rationale: Notwithstanding the project's inclusion of the aforementioned TDM program, mitigation measure M-TR-8 is required to reduce the significant cumulative impacts identified as TR-11, TR-13, TR-14, TR-15, and TR-18. Implementation of mitigation measure M-TR-8 would reduce the impact to less than significant by planned TIF improvements that would create better operating conditions and allow traffic to flow without substantial delays. The TIF program includes planned improvements to the impacted segments that would be funded by TIF fees from this project and the other developments with cumulative impacts to the roadway segments.

The County TIF program provides a mechanism for mitigating the impacts created by future growth within the unincorporated area. The TIF is a fee program designed to facilitate compliance with the CEQA mandate that development projects mitigate their indirect,

cumulative traffic impacts. The County TIF program fee requirement applies to all new development resulting in new/added traffic. The primary purpose of the TIF is twofold: (1) to fund the construction of identified roadway facilities needed to reduce, or mitigate, projected cumulative traffic impacts resulting from future development within the County; and (2) to allocate the costs of these roadway facilities proportionally among future developing properties based upon their individual cumulative traffic impacts.

TIF fees are deposited into local Community Planning Area accounts, regional accounts, and regional freeway ramp accounts. TIF funds are only used to pay for improvements to roadway facilities identified for inclusion in the TIF program, which includes both County roads and Caltrans highway facilities. TIF funds collected for a specific local or regional area must be spent in the same area. By ensuring TIF funds are spent for the specific roadway improvements identified in the TIF program, the CEQA mitigation requirement is satisfied, and the Mitigation Fee Act nexus is met.

As part of the TIF program process, the transportation infrastructure needs are characterized as existing deficiencies, direct impacts of future development, or indirect (cumulative) impacts of future development. Existing roadway deficiencies are the responsibility of existing developed land uses and government agencies and cannot be addressed using impact fees. The TIF program is not intended to mitigate direct impacts which will continue to be the responsibility of individual development projects. The TIF program, therefore, is designed to address only the cumulative impacts associated with new growth.

Based on the individual area and regional TIF accounts and the incorporation of projected build-out traffic conditions into the adopted TIF Report, participation in the TIF Program is adequate mitigation for cumulative impacts on County roadways. The segments identified are within the County's jurisdiction and are included in this TIF Program. Therefore, participation in the TIF Program constitutes adequate mitigation of the cumulative traffic impacts that would result from the project and with payment of the required fee, cumulative traffic impacts would be reduced to below a level of significance.

Impact TR-17: In the cumulative condition Lilac Road between Old Castle Road and Anthony Road would be degraded to operate at LOS E. The project would add more than 200 daily trips contributing to a significant cumulative impact.

Mitigation Measure M-TR-9: This mitigation measure specified in the FEIR has been imposed on the project as a condition of approval, requiring that prior to issuance of any building permit for new structures within the Lilac Hills Ranch Specific Plan, the applicant or its designee shall construct intermittent turn lanes at major access locations along Lilac Road from Old Castle Road to Anthony Road, including the segment between Robles Lane and Cumbres Road, and the intersection of Sierra Rojo Road and Lilac Road.

Rationale: Notwithstanding the project's inclusion of the aforementioned TDM program, mitigation measure M-TR-9 is required to reduce the significant cumulative impact identified as TR-17. The construction of intermittent left-turn lanes at major access locations along Lilac Road, between Old Castle Road and Anthony Road, identified as (1) the segment between Robles Lane and Cumbres Road; and (2) the intersection at Sierra Rojo Road and Lilac Road would prevent left-turning vehicles from blocking through traffic moving in the same direction, allowing traffic to continue to flow and improving traffic operations along Lilac Road. These improvements would allow the roadway to operate at LOS D or better. Mitigation measure M-

TR-9 mitigates the project's contribution to the cumulative impact along this roadway segment to below a level of significance.

As detailed in subchapter 2.3.6.1 of the FEIR, should these improvements require additional grading outside currently disturbed areas, potential direct impacts could result to biological resources in these areas. Pursuant to the County's vegetation mapping, the additional widening of Lilac Road necessary to add the turn lanes at the Robles Lane and Cumbres Road intersection could impact approximately 0.17 acre of chaparral. Impacts at Sierra Rojo and Lilac Road would affect approximately 0.14 acre of woodlands. Impacts to these sensitive resources would be mitigated in accordance with the County's Biology Guidelines, as required by measure M-BIO-1g. As discussed in the FEIR subchapter 2.5, indirect impacts to nesting raptors or migratory birds would be avoided, as the project includes design features implemented through project conditions of approval (i.e., preconstruction nesting surveys and, as needed, avoidance measures) to avoid such impacts.

Implementation of M-TR-9 would have a risk to impact unknown subsurface archaeological resources given the undisturbed nature of the areas adjacent to the existing roadway. As already required by M-CR-2, mitigation includes an archaeological grading monitor to be present to assure the identification and proper handling of potential archeological resources that may be disturbed during grading of the limits of the road. All secondary impacts associated with the mitigation of Impact TR-17 would be reduced to below a level of significance.

Impact TR-19: In the cumulative condition, more than one second of additional delay would be added to the signalized intersection of E. Vista Way and Gopher Canyon Road degrading operation to LOS F (AM and PM peak hours) and contributing to a significant cumulative impact.

Impact TR-23: In the cumulative condition, more than five peak hour trips would be added to the critical movement of the unsignalized intersection of Old Highway 395 and West Lilac Road degrading operation to LOS F (AM and PM peak hours) and contributing to a significant cumulative impact.

Impact TR-24: In the cumulative condition, two seconds or more additional delay would be added to the unsignalized intersection of I-15 SB Ramps and Old Highway 395 degrading operation to LOS F (AM and PM peak hours) and contributing to a significant cumulative impact.

Impact TR-25: In the cumulative condition, two seconds or more additional delay would be added to the unsignalized intersection of I-15 NB Ramps and Old Highway 395 degrading operation to LOS F (PM peak hour) and contributing to a significant cumulative impact.

Impact TR-27: In the cumulative condition, two seconds or more of additional delay would be added to the unsignalized intersection of I-15 SB Ramps and Gopher Canyon Road degrading operation to LOS F (AM and PM peak hours) and contributing to a significant cumulative impact.

Impact TR-28: In the cumulative condition, two seconds or more of additional delay would be added to the unsignalized intersection of I-15 NB Ramps and Gopher Canyon Road degrading operation to LOS F (AM and PM peak hours) and contributing to a significant cumulative impact.

Mitigation Measure: See mitigation measure M-TR-8.

Rationale: Notwithstanding the project's inclusion of the aforementioned TDM program, mitigation measure M-TR-8 is required to reduce the significant cumulative impacts identified as

TR-19, TR-23, TR-24, TR-25, TR-27 and TR-28. See explanation of TIF program under mitigation measure M-TR-8 above. Implementation of mitigation measure M-TR-8 would reduce the impacts to less than significant by planned TIF improvements that would create better operating conditions and allow traffic to flow without substantial delays. The TIF program includes planned improvements to the impacted segments that would be funded by TIF fees from this project and the other developments with cumulative impacts to the roadway segments.

Impact TR-22: In the cumulative condition, five peak hour trips would be added to the critical movement of the unsignalized intersection of Old Highway 395 and E. Dulin Road degrading operation to LOS F (AM and PM peak hours) and contributing to a significant cumulative impact.

Mitigation Measure M-TR-10: This mitigation measure specified in the FEIR has been imposed on the project as a condition of approval, requiring that prior to issuance of any building permit for new structures within the Lilac Hills Ranch Specific Plan, the applicant or its designee shall construct a traffic signal at the Old Highway 395 and East Dulin Road intersection.

Rationale: Notwithstanding the project's inclusion of the aforementioned TDM program, mitigation measure M-TR-10 is required to reduce the significant impact identified as TR-22. Implementation of mitigation measure M-TR-10 would improve roadway operations through the installation of traffic signals. After installation of the proposed traffic signal, the impacted intersection of Old Highway 395 and East Dulin Road would operate at LOS B during both the AM and PM peak hours (see Appendix E, Table 6.8). Therefore, this mitigation will reduce the impact to below a level of significance.

Impact TR-26: In the cumulative condition, five peak hour trips would be added to the critical movement of the unsignalized intersection of Old Highway 395 and Circle R Drive degrading operation to LOS F (AM and PM peak hours) and contributing to a significant cumulative impact.

Mitigation Measure: See mitigation measure M-TR-7.

Rationale: Notwithstanding the project's inclusion of the aforementioned TDM program, mitigation measure M-TR-7 is required to reduce the significant impact identified as TR-26. Mitigation measure M-TR-7 would occur in the Existing Plus Project (Traffic Scenario D). Mitigation measure M-TR-7 requires the installation of a traffic signal at Old Highway 395/E. Dulin Road. As shown in the intersection analysis (see Appendix E, Table 6.8), this improvement would reduce delay and result in the intersection operating at acceptable levels. Thus, this impact would be mitigated to below a level of significance.

Impact TR-29: In the cumulative condition, five peak hour trips would be added to the critical movement of the unsignalized intersection of Miller Road and Valley Center Road degrading operation to LOS F (PM peak hour) and contributing to a significant cumulative impact.

Mitigation Measure M-TR-11: This mitigation measure specified in the FEIR has been imposed on the project as a condition of approval, requiring that prior to issuance of any building permit for new structures within the Lilac Hills Ranch Specific Plan, the applicant or its designee shall construct a traffic signal at the intersection of Miller Road and Valley Center Road.

Rationale: Mitigation measure M-TR-11 is required to reduce the significant impact identified as TR-29. Implementation of mitigation measure M-TR-11 would improve roadway operations through the installation of a traffic signal. After installation of the proposed traffic signal, the impacted intersection of Miller Road and Valley Center Road would operate at LOS A during

both the AM and PM peak hours (see Appendix E, Table 6.8). Therefore, this mitigation will reduce the impact to below a level of significance.

Evidence Supporting CEQA Findings:

Substantial evidence to support the finding that Impacts TR-10, TR-11, TR-13 through TR-15, TR-18 through TR-19, TR-22 through TR-25, and TR-26 through TR-28 would be reduced to less than significant levels with the implementation of mitigation is found within the administrative record pertaining to this FEIR. Please refer to the following document(s):

- FEIR subchapter 2.3- specifically ,subchapters 2.3.2.1, 2.3.3, 2.3.5, 2.3.6.1
- FEIR Appendix E, Traffic Impact Study

C. Agricultural Resources Impacts

1. Direct Impacts

Impacts AG-1: The project was analyzed pursuant to the County's LARA Model and the project site was determined to be an important agricultural resource. Direct impacts would occur because the project site meets all three criteria: (1) it was determined to be an important agricultural resource after a run of the LARA Model; (2) the project would result in the conversion of 43.8 acres of soils that are available for agricultural use and would meet the soil quality criteria for Prime Farmland or Statewide Importance; and (3) the project would substantially impair the ongoing viability of the site for agricultural use. As a result, the project would result in a significant direct impact to agricultural resources.

Mitigation Measure M-AG-1: This mitigation measure specified in the FEIR has been imposed on the project as a condition of approval, requiring that pursuant to the County Guidelines (page 45) for direct impacts, a 1:1 mitigation ratio shall be required for impacts to Prime Farmland or Farmland of Statewide Importance and which are "available for agriculture." Therefore, the project shall implement one of the following option(s) to mitigate the project impact to 45.55 acres¹:

- A. The applicant shall purchase mitigation credits through the County's PACE program. The County's PACE program is an approved mitigation banking method which uses in-lieu fees to purchase PACE credits to offset agricultural impacts. Each acre of land permanently protected with an agricultural conservation easement under the PACE program would equate to one mitigation credit. Therefore, the applicant shall mitigate for the 45.55 acres¹ of Prime and Statewide important soils impacted, at a 1:1 ratio, through the purchase of 45.55¹ mitigation credits. The credits shall be purchased prior to the issuance of a grading permit.
- B. In the event that PACE credits are unavailable or the applicant elects not to participate, the applicant may choose to independently secure conservation

¹ This acreage includes impacts under M-RD-AG-1 under road design Option C.

easements. The conservation easement shall prohibit non-agricultural uses and must include Prime and Statewide important soils equal or greater to the soils being converted and at a 1:1 ratio (45.55¹ acres). The conservation easements shall occur within the cumulative project area or at a location approved by the Director of PDS. The applicant shall grant the easement in perpetuity to the County prior to the issuance of a grading permit.

- C. The applicant may choose to mitigate for 45.55¹ acres of Prime and Statewide important soils through a combination of options A and B so long as the total acreage of mitigation is equal to a 1:1 ratio (45.55¹ acres) and occurs on soils of equal value to those being converted. The applicant shall provide proof to the County that the mitigation has been implemented prior to the issuance of a grading permit.

Rationale: Mitigation measure M-AG-1 is required to reduce the significant impact identified as AG-1. Implementation of mitigation measure M-AG-1 would require the applicant to purchase 43.8 acres of credits through the County's PACE program, or the equivalent. Mitigation through the PACE program (Option A), off-site mitigation of quality soils (Option B), or mitigation through a combination of the two options (Option C) would adequately mitigate for the project's direct impacts to agriculture by preserving physical agricultural resources for agricultural use in perpetuity. As the PACE program has been developed as an overall programmatic solution to address preservation of agricultural lands within the unincorporated area, the County has determined that 1:1 mitigation through purchase of PACE mitigation credits is adequate to mitigate the project's identified impacts. This 1:1 ratio also represents the preservation ratio recommended pursuant to the County Agricultural Guidelines. Mitigation with Option B would also be adequate because it would require the land to contain soils of equal or higher quality within the cumulative project area or a location approved by the Director of PDS. Considering the number of acres required as mitigation, either option A or B or a combination of A and B would protect enough acreage to ensure long-term agricultural viability of the acreage protected. Viability is also ensured through the criteria for selection in the PACE program and the required approval of the mitigation location by the Director of PDS for Option B. In conclusion, M-AG-1 is adequate to reduce the identified significant direct impacts to agricultural resources.

Evidence Supporting CEQA Findings:

Substantial evidence to support the finding that Impact AG-1 would be reduced to less than significant levels with the implementation of mitigation is found within the administrative record pertaining to this FEIR. Please refer to the following document(s):

- FEIR subchapter 2.4- specifically ,subchapters 2.4.1.2, 2.4.2.1, 2.4.5, 2.4.6
- FEIR Appendix F, Agricultural resources Report
- Global Response to Comment: Agricultural Resources Direct Impacts

2. Indirect Impacts

The project includes design considerations, including project lighting restrictions, the implementation of which would reduce potentially significant indirect impacts. Additionally, disclosure statements will be included in all sales documentation for all proposed residential units, if agricultural uses still exists when new homes are constructed, disclosing potential adjacency issues (see, FEIR Table 1-3 for additional details). Each of these project design measures shall be implemented through the project's conditions of approval and subsequent permit conditions. However, as discussed in FEIR subchapter 2.4, even with implementation of

these design considerations, indirect impacts associated with agricultural adjacency would remain significant at a number of the specified sites due to the proximity or type of off-site agricultural activities, and additional mitigation measures would be required.

Impact AG-2: The project proposes Park P-7, as shown on the Specific Plan Map, FEIR Figure 1-4. A park site, which allows concentrations of people, would be considered a sensitive receptor in the analysis of agricultural impacts. Park P-7 is identified as an agricultural adjacency site (AA 6) as it would be located adjacent to existing off-site citrus and avocado orchards that are intermittently sprayed with pesticide. Therefore, a potentially significant adjacency impact could occur at this location.

Mitigation Measure M-AG-2: This mitigation measure specified in the FEIR has been imposed on the project as a condition of approval, requiring a 50-foot-wide agricultural buffer, planted with two rows of the appropriate tree crop (e.g., citrus, avocado) shall be provided. This buffer shall be located where residential uses in the project would abut existing, adjacent orchards and other agricultural operations in order to create a transition between the two uses, and as illustrated in FEIR Figures 2.4-7a through 2.4-7i. This buffer shall be required at impact locations AG-2 through AG-11 and AG-13 through AG-15, with the exception that at the location of Impacts AG-6 (AA 4), AG-9 (AA 9) and AG-3 (AA 13), this mitigation measure would provide fewer than two rows of trees due to site constraints as detailed in Figures 2.4-7b, 2.4-7g, and 2.4-7i. This measure is also implemented to reduce Impacts AG-13, AG-14 and AG-15.

Mitigation Measure M-AG-3: A six-foot-high fence shall be maintained along the southern edge of the park (AG-2), the institutional site (AG-3), and the age-restricted area (AG-4), each as illustrated in FEIR Figures 2.4-7a through 2.4-7i. The fence shall be one of two types (refer to Exhibit 137 of the Specific Plan): (1) solid masonry with a foundation that extends below ground level and with no gaps; or (2) a combination of masonry and metal fencing with no gaps.

Mitigation Measure M-AG-4: A Limited Building Zone shall be established to prohibit habitable structures as well as any structure (e.g., covered patios and picnic shade structures, a community building, etc.) which could accommodate congregating residents, visitors, or children. The prohibition includes (but is not limited to) ball fields, swimming pools, horseshoe pits, picnic areas, or any other uses that would attract or keep people near the project boundary or AA. This prohibition would also apply to the park site (AG-2), the institutional and age-restricted areas (AG-3 and AG-4) and along the project boundaries where it is necessary to discourage new residents from being within close proximity to off-site agricultural uses (AG-5, AG-6, and AG-8 through AG-11), each as illustrated in FEIR Figures 2.4-7a through 2.4-7i.

Rationale: Aerial pesticide spraying is regulated at both the state and County levels as pesticide applicators are subject to a rigorous permitting process. The County, through the County Agricultural Commissioner (CAC), is required to deny a permit application if it is determined that the pesticide use may harm people or the environment and no restrictions are available to mitigate that harm (California Department of Pesticide Regulation, *What You Need to Know About California Department of Pesticide Regulation*, www.cdpr.ca.gov).

To mitigate potential adjacency impacts to the park, implementation of mitigation measures M-AG-2 through M-AG-4 would result in an agricultural buffer 50 feet wide with two rows of trees, a LBZ 50 feet wide, and a fence between the adjacent, existing agricultural operations and the proposed park site. Therefore, the total buffer in this area would be 100 feet wide, and include two rows of trees, a fence, and a public road (See FEIR Figure 2.4-7d).