Mountain Ridge Road that are included in the project and that limit traffic flow through Phases 4 and 5. The Mountain Ridge Road Fire Station Alternative is included to disclose the impacts that would occur if a fire station and other associated improvements were constructed in Phase 5 of the project. Visual impacts under this alternative would remain significant and unavoidable. As set forth in FEIR subchapter 4.9.2, while this alternative would meet all of the main project objectives, no aspect of this alternative would reduce a significant impact of the project, and, therefore, this alternative is rejected as infeasible.

B. Air Quality Impacts

Mitigation is Infeasible for Air Quality Impacts

The project includes design considerations that are incorporated into the Specific Plan, the implementation of which would reduce potentially significant impacts associated with operational air quality impacts. As detailed in the FEIR Table 1-3, these measures include restrictions on the installation of wood-burning fireplaces; inclusion of pedestrian-friendly design and traffic reduction measures, such as complete sidewalk coverage within the project, internal trails, and bike lanes; installation of smart meters; performance criteria to achieve a 25 percent improvement in energy efficiency over the 2008 Title 24 energy efficiency requirements; use of all available engineering controls, such as blasting cabinets and local exhaust ventilation; the avoidance of compressed air for cleaning surfaces; and the use of activated carbon towers as the means to treat odors at the WRF. However, as discussed in FEIR subchapter 2.2, even with implementation of these design considerations, impacts associated with operational air quality would remain significant, and additional mitigation measures would be required.

Impact AQ-3: Operational emissions are projected to exceed the applicable SLTs for ROG, CO, and PM_{10} during Scenarios C through E.

Mitigation Measure M-AQ-6: This mitigation measure specified in the FEIR has been imposed upon the project as a condition of approval, requiring the project applicant/developer to develop a Green Cleaning Product education program to be made available at rental offices, leasing spaces, and/or on websites. The education program is intended for households and institutional consumers and consists of:

1. Provision of educational materials on low ROG/VOC consumer products;

2. Educational materials addressing the use of detergents; cleaning compounds; polishes; floor finishes; cosmetics; personal care products; home, lawn and garden products; disinfectants; sanitizers; aerosol paints; automotive specialty products; low ROG/VOC paints and architectural coatings; and low emission landscape equipment.

3. Educational materials on the importance of recycling and purchasing recycled material.

Mitigation Measure M-AQ-7: This mitigation measure specified in the FEIR has been imposed upon the project as a condition of approval, promoting ride share and alternative forms of transportation.

Mitigation Measure M-AQ-7a: This mitigation measure specified in the FEIR has been imposed upon the project as a condition of approval requiring any nonresidential building that

utilizes large-scale refrigerated storage (e.g., restaurant; grocery store) to equip each loading dock with an electrical hook-up to power refrigerated trucks.

Mitigation Measure M-AQ-7b: This mitigation measure specified in the FEIR has been imposed upon the project as a condition of approval requiring the project's HOA to require that all open space areas under its control be landscaped and maintained with electrical equipment, to the extent feasible.

Rationale: Notwithstanding the project's inclusion of the aforementioned project design considerations, implementation of mitigation measures M-AQ-6 and M-AQ-7 would be required to reduce the impact identified as AQ-3. The primary source of ROG emissions would be from consumer products, such as cleaning products and solvents, and the primary source of PM_{10} emissions would be from vehicle tire and brake wear. The PM_{10} emissions increase with vehicle miles travelled and would not be improved with vehicle efficiencies. Alterations in the project have been required that avoid or substantially lessen Impact AQ-3, requiring educating residence about using green cleaning products and promoting ride sharing. Mitigation measures M-AQ-6 and M-AQ-7 partially mitigate, but do not avoid or reduce Impacts AQ-3 to less than significant because commuting and consumer behavior cannot be regulated, and the effects of these mitigation measures cannot be quantified. Therefore, impacts would remain significant and unavoidable. A statement of overriding considerations would be required.

Evidence Supporting CEQA Findings:

Substantial evidence to support the finding that for Impact AQ-3, specific economic, legal, social, technological or other considerations make the mitigation measures or project alternatives identified in the FEIR infeasible is found within the administrative record pertaining to this FEIR. Please refer to the following document(s):

- FEIR subchapter 2.1- specifically subchapters 2.2.1, 2.2.2.2, 2.2.2.3, 2.2.5, 2.2.6.3,
- FEIR Appendix D, Air Quality Technical Report

Impact AQ-4: The phasing of project construction would result in a net increase of criteria pollutants as a result of operational and construction impacts occurring simultaneously.

Impact AQ-6: Operational and construction impacts associated with the project's phasing of construction, in combination with the emissions from other proposed projects or reasonably foreseeable future projects, would be cumulatively significant.

Mitigation Measure: See mitigation measures M-AQ-2 through M-AQ-7.

Rationale: Notwithstanding the project's inclusion of the aforementioned project design considerations, implementation of mitigation measures M-AQ-2 through M-AQ-7 would be required to reduce the impacts identified as AQ-4 and AQ-6. Implementation of mitigation measure M-AQ-2 requires additional dust-control measures during grading operations beyond standard dust and emission controls. Mitigation measure M-AQ-3 requires construction activities to be stopped 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. Mitigation measures M-AQ-6 and M-AQ-7 require educating residents about using green cleaning products and promoting ride sharing. Implementation of these mitigation measures partially mitigate, but does not avoid or reduce Impact AQ-4 to less

than significant. Therefore, impacts AQ-4 and AQ-6 would remain significant and unavoidable. A statement of overriding considerations would be required.

Evidence Supporting CEQA Findings:

Substantial evidence to support the finding that for Impacts AQ-4 and AQ-6, specific economic, legal, social, technological or other considerations make the mitigation measures or project alternatives identified in the FEIR infeasible is found within the administrative record pertaining to this FEIR. Please refer to the following document(s):

- FEIR subchapter 2.1- specifically subchapters 2.2.1, 2.2.2.3, 2.2.5, 2.2.6.3
- FEIR Appendix D, Air Quality Technical Report

Project Alternatives are Infeasible for Mitigating Air Quality Impacts

Project alternatives were designed to identify a range of reasonable alternatives to the project, which would feasibly attain most of the basic objectives of the project, but would avoid or substantially lessen any of the significant effects of the project. The project objectives are set forth in subchapter 1.1 of the FEIR and are listed above.

No Project/No Development Alternative

The No Project/No Development Alternative would maintain the existing conditions of the project site. This alternative would eliminate short-term emissions associated with grading and construction activities of the project, as well as long-term operational emissions because there would be no new on-site uses generating traffic or stationary sources generating emissions. While significant and unavoidable air quality impacts identified with the project would be avoided, none of the project objectives would be achieved. Since the No Project/No Development Alternative does not attain the project's primary objectives, it is rejected because it is infeasible.

Legal Lot Alternative

The Legal Lot Alternative would have a density consistent with regional air quality management plans. This alternative would generate 588 ADT, 97 percent less traffic than the project. Therefore, significant and unavoidable air quality impacts would be avoided because of the limited amount of traffic that would be generated from this alternative, and the minimal construction required to build a maximum of 49 homes. However, this alternative would not meet any of the project objectives. Therefore, the Legal Lot Alternative is rejected because it is infeasible.

General Plan Consistent Alternative

The General Plan Consistent Alternative would allow 110 residential units as contemplated in existing General Plan land use designation and SANDAG 2030 forecasts. Therefore, this alternative does not conflict with San Diego RAQS or SIP. This alternative would generate 1,320 ADTs, which would be approximately 93 percent less than the project resulting in less than significant traffic-related air quality impacts. Likewise, the construction of this alternative would require less grading, and operational impacts associated with this alternative would be below the threshold standard for impacts. While air quality impacts would be less than significant under this alternative, the alternative would not meet project objectives related to

creating a walkable mixed-use community, nor would it provide a range of housing and lifestyle opportunities in a manner that encourages non-automotive mobility. Therefore, the General Plan Consistent Alternative fails to meet most project objectives and is rejected because it is infeasible.

Reduced Footprint Alternative

The Reduced Footprint Alternative, like the project, would have a density that would be inconsistent with the General Plan and would be greater than that considered in regional air quality plans. Therefore, like the project, this alternative would result in significant unavoidable impacts associated with consistency with regional air quality management plans. This alternative would generate approximately 12,430 ADT, which would be 37 percent less than the project. Nonetheless, the alternative's operational-related air quality impacts would be significant due to the emission of ROG, CO, and PM_{10} above established thresholds. While project design and mitigation measures would be implemented, including the development of educational programs and materials for residents, impacts would remain significant and unavoidable. Additionally, this alternative would not meet the objective to accommodate future population growth in San Diego County by providing a range of diverse housing types through the creation of mixed-use and senior housing. Therefore, the Reduced Footprint Alternative is rejected because it is infeasible.

Reduced Intensity Alternative

The Reduced Intensity Alternative, although including fewer units than the project, would have a density inconsistent with the General Plan and, in turn, with regional air quality plans. Therefore, like the project, this alternative would result in significant and unavoidable impacts associated with consistency with regional air quality management plans. This alternative would generate 11,884 ADT which would be approximately 39 percent less than the project. However, operational emissions including ROG, CO, and PM_{10}, would still be above thresholds levels and, even with the implementation of mitigation measures, would remain significant and unavoidable. Additionally, this alternative would not meet project objectives associated with providing a pedestrian-oriented mixed-use community or providing a range of housing and lifestyle opportunities in a manner that encourages non-automotive mobility. Therefore, the Reduced Intensity Alternative is rejected because it is infeasible.

2.2C Alternative

The 2.2C Alternative, although including fewer units than the project, would have a density inconsistent with the General Plan and, in turn, with regional air quality plans. Therefore, like the project, this alternative would result in significant and unavoidable impacts associated with consistency with regional air quality management plans. This alternative would generate 16,789 ADT, which would be approximately 14 percent less than the project. However, operational air quality impacts associated with this alternative would be significant as daily emissions would likely exceed emissions thresholds and, even with the implementation of mitigation measures, would remain significant and unavoidable. Additionally, while this alternative would meet the objectives of the project, it would not do so to the same degree as the project. The loss of mixed-use residential would essentially remove the village atmosphere from the commercial area, significantly detracting from Objective 1's focus on developing a pedestrian-oriented mixed-use community. Therefore, the 2.2C Alternative is rejected because it is infeasible.

Road Design Alternative

No aspect of this alternative would reduce a significant impact of the project and, therefore, this alternative is rejected as infeasible.

Mountain Ridge Road Fire Station Alternative

This alternative would result in the same number of residential units and the same land use plan as the proposed project. Therefore, like the project, this alternative would result in significant and unavoidable impacts associated with consistency with regional air quality management plans. Implementation of the Mountain Ridge Road Fire Station Alternative (with Mountain Ridge Road Option 1) would have one additional significant and unavoidable construction impact related to NOx emissions during construction of Phases 3 and 5 (Impact MRR-AQ-1) due to increased construction activity along Mountain Ridge Road. The implementation of the Mountain Ridge Road Fire Station Alternative Option 2 (reduced Mountain Ridge Road right-of-way) would result in similar air quality impacts as Option 1. All other air quality impacts of this alternative would be similar to the project including significant and unavoidable air quality impacts.

C. Transportation/Traffic Impacts

Mitigation is Infeasible for Transportation/Traffic Impacts

Impact TR-12: In the cumulative condition Gopher Canyon Road between E. Vista Way and Little Gopher Canyon Road would be degraded to operate at LOS F. The cumulative projects plus the proposed project would add more than 100 daily trips to this road segment.

Mitigation Measure: Mitigation to reduce Impact TR-12 would require the construction of Gopher Canyon Road from E. Vista Way to Little Gopher Canyon Road to a Mobility Element 4.1B classification.

Rationale: Notwithstanding the project's inclusion of the aforementioned TDM, Impact TR-12 would remain. Impact TR-12 would be mitigated by improving this segment to a Mobility Element 4.1B classification; however, such mitigation is infeasible because the mitigation would not be proportional to the project impact. The proposed project contributes approximately 3.5 percent of the total trips to this road segment in the cumulative traffic condition. The cost of improving this 1.2-mile segment would be $8.5 million (equivalent to $7,097,000/mile) according to the County of San Diego TIF Update Facilities Cost Analysis (2012). The project's small contribution to the cumulative condition would not be roughly proportional to the cost of mitigation of improving this segment of Gopher Canyon Road to a 4.1B classification. Pursuant to CEQA Guidelines Section 15126.4(a)(4)(B), mitigation measures must be roughly proportional to the environmental impacts caused by the project. Therefore, because the project's contribution to the cumulative traffic condition is not roughly proportional to the improvements required to mitigate the impact, conditioning this project to construct the road improvements is not feasible under CEQA, and the impact would remain significant and unavoidable. There are no other feasible mitigation measures to mitigate this cumulative impact, and the impact would remain significant and unavoidable. A statement of overriding considerations would be required.

Impact TR-16: In the cumulative condition Pankey Road between Pala Mesa Drive and SR-76 would be degraded to operate at LOS F. The cumulative projects plus the proposed project would add more than 100 daily trips to this road segment.

Mitigation Measure: Mitigation to reduce Impact TR-16 would require the construction of Pankey Road from Pala Mesa Drive to SR-76 to a Mobility Element 4.2B classification.

Rationale: Notwithstanding the project's inclusion of the aforementioned TDM, Impact TR-16 would remain. Impact TR-16 would be mitigated by constructing Pankey Road from Pala Mesa Drive to SR-76 to Mobility Element 4.2B classification; however, such mitigation is infeasible because it would not be proportional to the project impact. The proposed project contributes approximately 5.2 percent of the total trips to this road segment in the cumulative traffic condition. The cost of improving this 0.7-mile segment would be $5.0 million (equivalent to $7,165,000/mile) according to the County of San Diego TIF Update Facilities Cost Analysis (2012). (See also, County of San Diego General Plan Mobility Element Tables M-1a, M-1b and M-2). Thus, the project's small contribution to the cumulative condition would not be roughly proportional to the cost of mitigation of improving Pankey Road to a 4.2B classification. Pursuant to CEQA Section 15126.4(a)(4)(B), mitigation measures must be roughly proportional to the environmental impacts caused by the project. Therefore, because the project's contribution to the cumulative traffic condition is not roughly proportional to the improvements required to mitigate the impact, conditioning this project to construct the road improvements is not feasible under CEQA, and the impact would remain significant and unavoidable. A statement of overriding considerations would be required.

Evidence Supporting CEQA Findings:

Substantial evidence to support the finding that for Impacts TR-12 and TR-16, specific economic, legal, social, technological or other considerations make the mitigation measures or project alternatives identified in the FEIR infeasible is found within the administrative record pertaining to this FEIR. Please refer to the following document(s):

- FEIR subchapter 2.3- specifically subchapters 2.3.1, 2.3.3.1, 2.3.5.1, 2.3.6.1
- FEIR Appendix E, Traffic Impact Study

Project Alternatives are Infeasible for Mitigating Transportation/Traffic Impacts

Project alternatives were designed to identify a range of reasonable alternatives to the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project. The project objectives are set forth in subchapter 1.1 of the FEIR, and listed above.

No Project/No Development Alternative

Under the No Project/No Development Alternative, traffic generation would continue to total 192 trips based on the existing residences and related agricultural uses of the site. Traffic impacts would not occur. While significant and unavoidable traffic impacts identified with the project would be avoided, none of the project objectives would be achieved. Since the No Project/No Development Alternative does not attain the project's primary objectives, it is rejected because it is infeasible.

Legal Lot Alternative

The Legal Lot Alternative would generate 97 percent less ADT compared to the project. This alternative's traffic generation would not result in impacts to the existing LOS on surrounding area roadways, avoiding significant and unavoidable traffic impacts identified for the project. However, this alternative would not meet any of the project objectives. Therefore, the Legal Lot Alternative is rejected because it is infeasible.

General Plan Consistent Alternative

This alternative would generate approximately 93 percent less ADT than that generated by the project. Because most roads surrounding the site currently operate at LOS A, the existing road system would be able to accommodate both direct and cumulative traffic associated with this alternative. While significant and unavoidable traffic impacts would be avoided under this alternative, the alternative would not meet project objectives related to creating a walkable mixed-use community, nor would it provide a range of housing and lifestyle opportunities in a manner that encourages non-automotive mobility. Therefore, the General Plan Consistent Alternative is rejected because it is infeasible.

Reduced Footprint Alternative

This alternative would generate 37 percent less ADT than the project, which generates 19,428 ADTs. Significant traffic impacts would occur due to the increase of traffic on local roads. Like the project, degradation of service to below LOS E or F on the roadways identified in Impacts TR-4, TR-5, TR-8, and TR-13 would remain significant and unavoidable due to the infeasibility of mitigation measures. Additionally, this alternative would not meet the objective for the accommodation of future growth by providing a range of diverse housing types, through the creation of mixed-use and senior housing. Therefore, the Reduced Footprint Alternative is rejected because it is infeasible.

Reduced Intensity Alternative

This alternative would generate 39 percent less ADT than the project, which generates 19,428 ADTs. Significant traffic impacts would occur due to the increase of traffic on local roads. Like the project, degradation of service to below LOS E or F on the roadways identified in Impacts TR-4, TR-5, TR-8, and TR-13 would remain significant and unavoidable due to the infeasibility of mitigation measures. Additionally, this alternative would not meet project objectives associated with providing a pedestrian-oriented mixed-use community, or providing a range of housing and lifestyle opportunities in a manner that encourages non-automotive mobility. Therefore, the Reduced Intensity Alternative is rejected because it is infeasible.

2.2C Alternative

This alternative would generate 14 percent less ADT than the project, which generates 19,428 ADTs. Significant traffic impacts would occur due to the increase of traffic on local roads. Like the project, degradation of service to below LOS E or F on the roadways identified in Impacts TR-4, TR-5, TR-8, and TR-13 would remain significant and unavoidable due to the infeasibility of mitigation measures. Additionally, while this alternative would meet the objectives of the project, it would not do so to the same degree. The loss of mixed-use residential would essentially remove the village atmosphere from the commercial area, detracting from Objective 1's focus on developing a pedestrian-oriented mixed-use community. Therefore, the 2.2C Alternative is rejected because it is infeasible.

Road Design Alternative

No aspect of this alternative would result in the reduction of a significant project impact, and, therefore, this alternative is rejected as infeasible.

Mountain Ridge Road Fire Station Alternative

This alternative would result in the same number of residential units and the same land use plan as the proposed project. Implementation of the Mountain Ridge Road Fire Station Alternative (with Mountain Ridge Road Option 1) would have the same circulation system and congestion management impacts as the project. Also, similar to the project, the traffic hazard and public transit, bicycle and pedestrian facility impacts of the Mountain Ridge Road Fire Station Alternative would be less than significant. The change in trip distribution, removal of gated access in Phases 4 and 5, and the Mountain Ridge Road reclassification that occur under this alternative would not alter the overall transportation/traffic impact conclusions identified for the project. Likewise, implementation of the Mountain Ridge Road Fire Station Alternative Option 2 (reduced Mountain Ridge Road right-of-way) would result in the same transportation/traffic impacts as Option 1. The elimination of 4 feet of grading on each side of Mountain Ridge Road would have no effect on the amount of vehicular traffic on Mountain Ridge Road or on roadway operations. All traffic impacts of this alternative would be similar to the project including significant and unavoidable impacts.

D. Noise Impacts

Mitigation is Infeasible for Noise Impacts

Impact N-3: Traffic-generated noise at off-site receivers adjacent to Covey Lane and future Lilac Hills Ranch Road would increase significantly over existing conditions and would result in a significant impact.

Impact N-17: The project would place NSLUs in areas where the projected cumulative noise levels from road traffic could exceed the County's exterior noise limits. This is a significant cumulative impact.

Mitigation Measure: Several mitigation measures would be available to attenuate traffic noise, such as noise barriers, road surface improvements, regulatory measures (such as lower speed limits), and traffic calming devices (such as speed bumps).

Rationale: Impact N-3 could be mitigated by several methods; however, none of these measures are considered to be feasible for a variety of reasons. As an example, a continuous barrier on private property would be effective. However, the need to provide openings in the wall for driveway access would make a continuous, solid barrier infeasible. In addition, some measures may not be desired by the local residents due to visual or traffic safety impacts. Other measures, such as reduced speed limits or traffic calming devices may negatively affect traffic circulation and emergency response times. For these reasons, both direct and cumulative off-site traffic noise impacts along Covey Lane and the future Lilac Hills Ranch Road would remain significant and unavoidable. A statement of overriding considerations would be required.

Project Alternatives are Infeasible for Mitigating Noise Impacts

Project alternatives were designed to identify a range of reasonable alternatives to the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project. The project objectives are set forth in subchapter 1.1 of the FEIR, and listed above.

No Project/No Development Alternative

Under the No Project/No Development Alternative, there would be no cumulatively considerable increase in traffic generation resulting in exterior off-site noise impacts. While significant and unavoidable cumulative noise impacts identified with the project would be avoided, none of the project objectives would be achieved. Since the No Project/No Development Alternative does not attain the project's primary objectives, it is rejected because it is infeasible.

Legal Lot Alternative

The Legal Lot Alternative would generate 97 percent less ADT compared to the project. This alternative's traffic generation would not result in cumulatively considerable noise impacts on surrounding area roadways, avoiding significant and unavoidable cumulative noise impacts identified for the project. However, this alternative would not meet any of the project objectives. Therefore, the Legal Lot Alternative is rejected because it is infeasible.

General Plan Consistent Alternative

This alternative would generate approximately 93 percent less ADT than the project. Because most roads surrounding the site currently operate at LOS A, the addition of traffic noise generated by the alternative, to the existing road noise would not increase the noise level by a cumulatively considerable amount. While significant and unavoidable cumulative noise impacts would be avoided under this alternative, the alternative would not meet project objectives relating to creating a walkable mixed-use village, nor would it provide a range of housing and lifestyle opportunities in a manner that encourages non-automotive mobility. Therefore, the General Plan Consistent Alternative is rejected because it is infeasible.

Reduced Footprint Alternative

Under this alternative significant traffic impacts would occur due to the increase of traffic on local roads. The increase in traffic would likely result in cumulatively considerable increase in traffic-generated noise. Like the project, cumulative noise impacts would remain significant and unavoidable due to the infeasibility of mitigation measures. Additionally, this alternative would not meet the objective for the accommodation of future growth through the creation of mixed-use or senior housing. Therefore, the Reduced Footprint Alternative is rejected because it is infeasible.

Reduced Intensity Alternative

Under this alternative significant traffic impacts would occur due to the increase of traffic on local roads. The increase in traffic would likely result in a cumulatively considerable increase in traffic-generated noise. Like the project, cumulative noise impacts along off-site roads would remain significant and unavoidable due to the infeasibility of mitigation measures. Additionally, this alternative would not meet project objectives associated with providing a pedestrian-

oriented mixed-use community, or providing a range of housing and lifestyle opportunities in a manner that encourages non-automotive mobility. Therefore, the Reduced Intensity Alternative is rejected because it is infeasible.

2.2C Alternative

Under this alternative significant traffic impacts would occur due to the increase of traffic on local roads. The increase in traffic would likely result in cumulatively considerable increase in traffic-generated noise. Like the project, cumulative noise impacts along off-site roads would remain significant and unavoidable due to the infeasibility of mitigation measures. Additionally, while this alternative would meet the objectives of the project, it would not do so to the same degree. The loss of mixed-use residential would essentially remove the village atmosphere from the commercial area, detracting from Objective 1's focus on developing a pedestrian-oriented mixed-use community. Therefore, the 2.2C Alternative is rejected because it is infeasible.

Road Design Alternative

No aspect of this alternative would result in the reduction of a significant project impact, and, therefore, this alternative is rejected as infeasible.

Mountain Ridge Road Fire Station Alternative

This alternative would result in the same number of residential units and the same land use plan as the proposed project. The Mountain Ridge Road Fire Station Alternative would result in the same significant, mitigated traffic impacts and stationary and construction noise/vibration impacts as the project. However, Mountain Ridge Road Fire Station Option 1 of this alternative would result in a new significant vibration impact (Impact MRR-N-1) due to the roadway construction occurring within 150 feet of a residence. The implementation of the Mountain Ridge Road Fire Station Alternative Option 2 (reduced Mountain Ridge Road right-of-way) would eliminate 4 feet of grading on each side of Mountain Ridge Road relative to Option 1. This change would not affect the traffic noise analysis, as traffic noise analysis is calculated based on the centerline of the roadway, traffic volumes and the receiver location, and those factors would be the same under both options.

MITIGATION MONITORING AND REPORTING PROGRAM

As required by Public Resources Code Section 21081.6(a)(1) and CEQA Guidelines, section 15097, the County, in adopting these findings, also concurrently adopts a MMRP. The program is designed to ensure that during project implementation, the applicant and any other responsible parties comply with the feasible mitigation measures identified herein. The program is incorporated into the mitigation measures adopted as conditions of approval for the project. The County will use the MMRP to track compliance with project mitigation measures.

The monitoring program will serve the dual purpose of verifying completion of the mitigation measures for the project and generating information on the effectiveness of the mitigation measures to guide future decisions. The program includes monitoring team qualifications, specific monitoring activities, a reporting system, and criteria for evaluating the success of the mitigation measures.

RECORD OF PROCEEDINGS

For purposes of CEQA and the findings set forth herein, the administrative record of the County Board of Supervisors' decision on the environmental analysis of this project consists of the following:

- The Notice of Preparation and all other public notices issued by the County in conjunction with the project;
- The Draft and Final EIR for the project and all documents cited therein, including appendices and technical reports;
- All comments submitted by agencies and members of the public during the public comment period on the Draft REIR;
- All reports, studies, memoranda, maps, staff reports, or other planning documents relating to the project prepared by the County, consultants to the County, or responsible or trustee agencies with respect to the County's compliance with the requirements of CEQA and the County's actions on the project;
- All documents, comments, and correspondence submitted by members of the public and public agencies in connection with this project, in addition to comments on the EIR for the project;
- All documents submitted to the County by other public agencies or members of the public in connection with the EIR through the close of the public hearing;
- Minutes and verbatim transcripts of all workshops, the scoping meeting, other public meetings, and public hearings held by the County, or videotapes where transcripts are not available or adequate;
- Any documentary or other evidence submitted at workshops, public meetings, and public hearings for this project;
- All findings and resolutions adopted by County decision makers in connection with this project, and all documents cited or referred to therein; and
- Matters of common knowledge to the County which the members of the County Board of Supervisors considered regarding this project, including federal, state, and local laws and regulations, and including, but not limited to, the following:
  - County of San Diego General Plan;
  - Relevant portions of the County Zoning Code;
  - Relevant portions of the County of San Diego Multiple Species Conservation Program Subarea Plan; and
  - Any other materials required to be in the record of proceedings by Public Resources Code Section 21167.6(e).

The custodian of the documents comprising the record of proceedings is:

County of San Diego, Department of Planning and Development Services (PDS)
5510 Overland Avenue, Suite 310,
San Diego, CA, 92123;

and

County of San Diego, Clerk of the Board of Supervisors
1600 Pacific Highway, Room 402
San Diego, CA, 92101

The County of San Diego Board of Supervisors relied on all of the documents listed above in reaching its decision on the project, even if every document was not formally presented to the Board or County staff as part of the County files generated in connection with the project. Without exception, any documents set forth above, but not found in the project files, fall into two categories. Many of them reflect prior planning or legislative decisions with which the Board of Supervisors was aware in approving the project (see *City of Santa Cruz v. Local Agency Formation Commission* (1978) 76 Cal.App.3d 381, 391-392; *Dominey v. Department of Personnel Administration* (1988) 205 Cal.App.3d 729, 738, fn. 6). Other documents influenced the expert advice provided to County staff or consultants, who then provided advice to the Board of Supervisors. For that reason, such documents form part of the underlying factual basis for the Board of Supervisors' decision relating to the project (see Pub. Resources Code, Section 21167.6(e)(10); *Browing-Ferris Industries v. City Council of City of San Jose* (1986) 181 Cal. App.3d 852, 866; *Stanislaus Audubon Society, Inc. v. County of Stanislaus* (1995) 33 Cal.App.4th 144, 153, 155).

STATEMENT OF OVERRIDING CONSIDERATIONS

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

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August 7, 2015

Background

The California Environmental Quality Act (CEQA) requires the decision-making agency to balance, as applicable, the economic, legal, social, technological or other benefits of a project against its unavoidable environmental risks when determining whether to approve the project. If the specific economic, legal, social, technological or other benefits of the project outweigh the unavoidable adverse environmental effects, those effects may be considered "acceptable" (CEQA Guidelines Section 15093, subd. [a]). CEQA requires the agency to support, in writing, the specific reasons for considering a project acceptable when significant impacts are not avoided or substantially lessened. Those reasons must be based on substantial evidence in the Final EIR or elsewhere in the administrative record (CEQA Guidelines Section 15093, subd. [b]).

In accordance with the requirements of CEQA and the CEQA Guidelines, the Board of Supervisors finds that the mitigation measures identified in the Final EIR (FEIR) and the Mitigation Monitoring Plan, when implemented, will avoid or substantially lessen virtually all of the significant effects identified in the FEIR for the Lilac Hills Ranch Project. However, certain significant impacts of the Project are unavoidable even after incorporation of all feasible mitigation measures. Pursuant to Section 21081 of CEQA and Section 15091 of the State CEQA Guidelines, the Board of Supervisors finds that mitigation is not feasible to reduce the following impacts to less than significant levels, with these impacts considered significant and unavoidable: (1) Visual Resources, (2) Air Quality, (3) Transportation/Traffic and (4) Noise.

Additional discussion of the significant and unavoidable impacts associated with the Proposed Project is provided in the "Findings Regarding Significant Effects Pursuant to CEQA Guidelines Section 15091".

Overriding Benefits

The County finds that the project would have the following social, environmental and economic Overriding benefits.

Employment Opportunities. The Lilac Hills Ranch project would help grow the local economy. It will create new employment opportunities in the County with the provision of new retail, office, and commercial uses that would create a variety of employment opportunities. The construction of the Lilac Hills Ranch Specific Plan would generate substantial revenue to the local economy and provide a significant number of construction-related jobs over a 20+ year construction period. Those that would benefit from employment from development under the Lilac Hills Ranch Specific Plan would range from students and adults filling part-time and full-time positions, skilled tradesmen filling certain commercial positions, and professionals filling commercial and office positions.

New Property and Sales Tax Revenue. Development of vacant land will result in an increase of property tax revenues over the 20+ year build-out period. In addition, the project would construct 90,000 square feet of commercial retail and office space which would generate significant sales tax dollars.

Recreational Benefits.

a. Recreational Development. The project would provide a total of 25.6 acres of parks and recreational facilities, 13.5 acres of which would be dedicated to the County as a public park.

b. Provision for Community Trails. The project includes numerous trails, and community pathways throughout the project site. Specifically, the project would construct a portion of the trail network as identified on the County's Community Trails Master Plan (CTMP) and provide off-site connections to other existing and proposed trails.

Long Term Housing Needs. The project will help meet a projected long term regional need for housing through the provision of future additional housing. San Diego Association of Governments housing capacity studies indicate a shortage of housing will occur in the region within the next 20 years. Over anticipated build-out, the project would increase the housing stock in the County by up to 1,746 dwelling units, including entry level housing, apartments, assisted living and senior housing. Phasing will occur in response to market conditions, which will help fulfill the demand for housing.

Dedication of School Site. A 12-acre site suitable for a K-8 school would be located within the project site. The school site (within Phase 3) is proposed for a public or private school to serve the educational needs of the residents of the project and surrounding areas. The dedication of the school site could provide an additional school facility that could be used as determined necessary by the school district.

DECISION AND EXPLANATION REGARDING RECIRCULATION OF 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

BACKGROUND

A Draft Revised Environmental Impact Report (DREIR) for the Lilac Hills Ranch Project (hereafter referred to as "Proposed Project" or "Project") was circulated for public review in June 2014. Several federal, state and local agencies, private organizations and individuals submitted comment letters on the DREIR. Approximately 187 comment letters were received by the County of San Diego (County). The County prepared responses to all comments received, which are included in the Final EIR (FEIR). After public review, the DREIR was changed or modified in several places either in response to public comments received, or the Project Applicant's or the County's desire to clarify a matter. Pursuant to State California Environmental Quality Act (CEQA) Guidelines Section 15088.5(a), the County is required to recirculate a Draft EIR if significant new information is added after public review of a Draft EIR, but before certification. New information added to a Draft EIR is not significant unless the Draft EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse effect of the Project or a feasible way to mitigate or avoid such an effect (including feasible alternatives) that the Project's proponents have declined to implement.

DECISION

The Board of Supervisors has reviewed the changes made to the DREIR following public review and determines that no "significant new information" has been added and therefore, recirculation of the DREIR is not required. The following provides an explanation of the most relevant modifications made to the DREIR that are included in the FEIR. A matrix of additional minor revisions to the FEIR is included as Attachment "A."[1]

Fire Options

The Summary Chapter, Project Description and Subchapter 2.7 were revised to clarify that the project would meet the travel time standards identified by the County's General Plan with implementation of one of the four fire service options. In addition, Fire Option 1 was revised to clarify that this option would be based upon Deer Springs Fire Protection District and/or CAL FIRE providing fire and medical emergency services from Miller Station to the project within the 5-minute travel time standard.

[1] Note that grammatical and other non-substantive revisions are not listed on Attachment "A", but are shown in strike-out underline in the FEIR.

Areas of Controversy

Page S-5. The FEIR was revised to reflect additional issues that were raised as a result of recirculating the DREIR for public review that commenced in June 2014. New areas of controversy included issues related to General Plan consistency including compliance with Land Use Element policy LU-1.2, flexibility of the proposed phasing plan, easement rights of the project needed to construct required improvements, the adequacy of fire services and evacuation, and significant and unavoidable impacts to I-15 segments. Several commenters raised issues with the analysis, feasibility, and impacts associated with the Mountain Ridge Road Fire Station Alternative. Other areas of concern include the approach to analyzing the project's GHG emissions, the adequacy of the road network, trip generation estimates, and traffic safety.

Additional Design Measures:

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.

Removal of Group Care Facility

- Due to amendments to the County Zoning Ordinance, the project was required to change the proposed Urban Residential (RU) use regulations (zoning) to Single Family Residential (RS) use regulations as applied to the proposed residential portions of the project. When the project description was initially developed, either the RU or RS residential use designation could have been selected. On July 25, 2012, the County Board of Supervisors approved an amendment to the Zoning Ordinance which made a number of changes to various sections of the ordinance. In particular, the Compatibility Matrix, as well as text of Sections 2050 and 2072, was revised to better reflect the new General Plan designations. Under the new language, the RS residential use designation is the most appropriate zone for the project.

- As a consequence of the Zoning Ordinance amendment and the identification of the RS use designation for the project site, Group Residential has been deleted as an allowed use in the areas